



KANSAS GOVERNOR'S GRANTS PROGRAM FEDERAL CIVIL RIGHTS COMPLIANCE FORM

The Kansas Governor's Grants Program (KGGP) must verify the Subgrantee has a current (less than one year old) completed Federal Civil Rights Compliance Form on file before a grant awarded with federal funds is opened. The following information must be completed and approved by the KGGP Analyst assigned to each subgrantee. Select Yes or No response and provide a brief comment where requested.

DOCUMENT SUBMISSION REQUIRED. All subgrantees must provide an Equal Employment Opportunity Plan (EEO) Certification Form, Limited English Proficiency (LEP) policy, and non-discrimination policy. If the LEP and non-discrimination policies are on file with KGGP and remain unchanged since submission, the policies do not have to be resubmitted. If applicable, please provide the Board approval date of submitted policies and a copy of the subgrantee's EEO.

Return the completed Federal Civil Rights Compliance Form and a copy of the applicable documents to kggp@ks.gov.

Subgrantee agency:

Name of individual completing form:

Phone Number:

Email:

Date form completed:

1. Has the subgrantee submitted a Certification Form to the Office for Civil Rights (OCR) claiming a complete exemption from the EEO requirements? (Less than 50 employees; or nonprofit organization, Indian Tribe, educational institution, medical institution; or receiving no single award of \$25,000 or more.) Yes No
If yes, on what date did the agency submit the Certification Form?
2. If the subgrantee is required to prepare and submit an EEO Utilization Report to the OCR, Office of Justice Programs (OJP), U.S. Department of Justice (DOJ) in accordance with 28 C.F.R. §§ 42.301 - .308, has the subgrantee done so? (50 or more employees AND is receiving an individual grant of \$25,000 or more.) Yes No N/A
If yes, on what date did the agency submit the Certification Form?
If yes, on what date did the subgrantee prepare the EEO?
If yes, on what date did the subgrantee submit the EEO Utilization Report?
 - Subgrantees are required to use the OCR's on-line reporting tool when submitting EEO certification and documentation.
 - If a Subgrantee is eligible for a complete exemption as stated in 1, then 2 will not apply.

3. How does the subgrantee notify program participants and beneficiaries that it does not discriminate on the basis of race, color, national origin, religion, sex, disability, age, and, if a recipient of funding authorized by the Violence Against Women Act of 1994 (VAWA) or its subsequent enactments, sexual orientation and gender identity, in the delivery of services (e.g., posters, inclusion in brochures or other program materials)?

Comments:

4. How does the subgrantee notify employees that it does not discriminate on the basis of race, color, national origin, religion, sex, disability, and, if a VAWA recipient, sexual orientation and gender identity, in employment practices (e.g., posters, dissemination of relevant orders or policies, inclusion in recruitment materials)? **Please include page numbers to indicate the location of applicable information.**

Comments:

5. Does the agency have written policies or procedures in place for notifying employees how to file complaints alleging discrimination by the agency? **Please include page numbers to indicate the location of applicable information.** Yes No

If yes, provide an explanation of these policies and procedures:

6. Does the agency have written policies or procedures in place for notifying program participants and beneficiaries how to file complaints alleging discrimination by the subgrantee, including how to file complaints with the Kansas Governor's Grants Program and the OCR? **Please include page numbers to indicate the location of applicable information.** Yes No

If yes, provide an explanation of these policies and procedures:

7. Does the subgrantee have 50 or more employees and receive DOJ funding of \$25,000 or more? Yes No
- a. If yes, has the subgrantee adopted grievance procedures that incorporate due process standards and provide for the prompt and equitable resolution of complaints alleging a violation of the DOJ regulations implementing Section 504 of the Rehabilitation Act of 1973, found at 28 C.F.R. Part 42, Subpart G, which prohibit discrimination on the basis of disability in employment practices and the delivery of services? **Please include page numbers to indicate the location of applicable information.** Yes No
- b. If yes, has the subgrantee designated a person to coordinate compliance with the prohibitions against disability discrimination contained in 28 C.F.R. Part 42, Subpart G? Yes No

- c. If yes, has the subgrantee notified program participants, beneficiaries, employees, applicants, and others that the agency does not discriminate on the basis of disability? Yes No

Comments:

8. Does the subgrantee operate an education program or activity? Yes No

- a. If yes, has the subgrantee adopted grievance procedures that provide for the prompt and equitable resolution of complaints alleging a violation of the DOJ regulations implementing Title IX of the Education Amendments of 1972, found at 28 C.F.R. Part 54, which prohibit discrimination on the basis of sex? **Please include page numbers to indicate the location of applicable information.** Yes No
- b. If yes, has the subgrantee designated a person to coordinate compliance with the prohibitions against sex-discrimination contained in 28 C.F.R. Part 54? Yes No
- c. If yes, has the subgrantee notified applicants for admission and employment, employees, students, parents, and others that the agency does not discriminate on the basis of sex in its education programs or activities? Yes No

Comments:

9. Has the subgrantee complied with the requirement to submit to the OCR any findings of discrimination against the subrecipient issued by a federal or state court or a federal or state administrative agency on the grounds of race, color, religion, national origin, age, disability, or sex? Yes No N/A

Comments:

10. What steps has the subgrantee taken to provide meaningful access to its programs and activities to persons who have LEP (including an indication of whether the subgrantee has developed a written policy on providing language access services to LEP persons)?

Comments:

11. Does the subgrantee conduct any training for its employees on the requirements under federal civil rights laws? Yes No

If yes, how often:

If yes, date of most recent training:

Comments:

12. Does the subgrantee conduct religious activities as part of its programs or services? Yes No
- a. If yes, does the subgrantee provide federally funded services to eligible beneficiaries regardless of religion, a religious belief, a refusal to hold a religious belief, or a refusal to attend or participate in a religious practice? Yes No
- b. If yes, does the subgrantee ensure that it does not use federal funds to conduct inherently religious activities, such as prayer, religious instruction, or proselytization, and that such activities are kept separate in time or place from federally-funded activities? Yes No
- c. If yes, does the subgrantee ensure that participation in religious activities is voluntary for beneficiaries of federally-funded programs? Yes No

Comments:

13. Does the subgrantee receive VAWA funds? Yes No
- a. If yes, does the subgrantee serve male victims of domestic violence, dating violence, sexual assault, and stalking? Yes No

Comments:

- b. If yes, does the subgrantee provide sex-segregated or sex-specific services? Yes No

If yes, describe how services are sex-segregated or sex-specific:

If yes, has the subgrantee determined that providing services that are sex-segregated or sex-specific is necessary to the essential operation of the program? Yes No

If yes, describe how the subgrantee determined that providing sex-segregated or sex-specific services is necessary to the essential operation of the program:

14. The LEP policy is on file with the KGGP, remains unchanged since submission, and is not included with this Form. Yes N/A
15. The non-discrimination policy is on file with the KGGP, remains unchanged since submission, and is not included with this Form. Yes N/A

By my signature I certify, as the Authorizing Official, the documentation being submitted to KGGP with this Form and the answers to the above questions are true and correct.

Signature of Authorizing Official: _____ Date: _____

Online resources available:

Office of Civil Rights www.ojp.usdoj.gov/ocr

Limited English Proficiency www.lep.gov

SPACE BELOW FOR KGGP USE ONLY:

ACTION NEEDED:

DATE CORRECTIONS WERE COMPLETED:

I have reviewed and verified the information provided by the subgrantee.

Signature of Analyst: _____ Date: _____

Revised March 2022