

Juvenile Justice Programs Office

Methods of Administration for Civil Rights

All State Administering Agencies (SAAs) have a responsibility to monitor their sub-recipients to ensure that the sub-recipients are complying with the federal civil rights laws that are applicable to recipients of federal financial assistance. In accordance with 28 C.F.R. §§ 42.105(d)(2), 42.504(a), 42.725, and 54.115, SAAs must establish and implement written Methods of Administration for ensuring their sub-recipients' compliance with the prohibition against race, color, and national origin discrimination contained in Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d) and the Department of Justice (DOJ) regulations at 28 C.F.R. pt. 42, subpt. C; the prohibition against disability discrimination contained in Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. § 794) and the DOJ regulations at 28 C.F.R. pt. 42, subpt. G; the prohibition against age discrimination contained in the Age Discrimination Act of 1975 (42 U.S.C. § 6102) and the DOJ regulations at 28 C.F.R. pt. 42, subpt. I; and the prohibition against sex discrimination in education programs contained in Title IX of the Education Amendments of 1972 (20 U.S.C. § 1681) and the DOJ regulations at 28 C.F.R. pt. 54. These Methods of Administration are the reasonable assurance that SAAs provide to the DOJ that they are ensuring the civil rights compliance of their sub-recipients. An SAA's expansion of its written Methods of Administration to include the prohibitions of nondiscrimination contained in the Omnibus Crime Control and Safe Streets Act of 1968 (42 U.S.C. § 3789d(c)), the Juvenile Justice and Delinquency Prevention Act of 1974 (42 U.S.C. § 5672(b)), and the Victims of Crime Act of 1984 (42 U.S.C. § 10604(e)) and the DOJ implementing regulations (as applicable), and the DOJ regulations on the Equal Treatment for Faith-Based Organizations (28 C.F.R. pt. 38), will be considered strong evidence of the SAA's fulfillment of its responsibility to ensure sub-recipients' compliance with these laws. These laws prohibit discrimination based on race, color, national origin, disability, religion, and sex in the delivery of services and employment practices, and prohibit recipients from using federal financial assistance to engage in inherently religious activities.

Congress linked the receipt of Federal funding to compliance with Federal civil rights laws. The Office for Civil Rights (OCR), Office of Justice Programs (OJP), and U.S. Department of Justice (DOJ) is responsible for ensuring that recipients of financial aid from OJP, its component offices and bureaus, the Office on Violence Against Women (OVW), and the Office of Community Oriented Policing Services (COPS) comply with applicable Federal civil rights statutes and regulations. OCR is available to help you and your organization meet the civil rights requirements that come with DOJ funding.

Recipients must comply (and will require any sub-grantees or contractors to comply) with any Federal nondiscrimination requirements, which may include:

- Omnibus Crime Control and Safe Streets Act (Safe Streets Act) of 1968 (42 U.S.C. § 3789d);
- The Victims of Crime Act (42 U.S.C. § 10604 (e));
- The Juvenile Justice and Delinquency Prevention Act of 2002 (42 U.S.C. § 5672 (b));
- The Civil Rights Act of 1964 (42 U.S.C. § 2000d);
- The Rehabilitation Act of 1973 (29 U.S.C. § 794);
- The Americans with Disabilities Act of 1990 (42 U.S.C. §§ 12131-34);
- The Education Amendments of 1972 (20 U.S.C. §§ 1681, 1683, 1685-86);
- The Age Discrimination Act of 1975 (42 U.S.C. §§ 6101-07);
- 28 C.F.R pt. 35 (DOJ Regulations – Nondiscrimination on the Basis of Disability in State and Local Government Services);

- 28 C.F.R. pt. 42 (DOJ Regulations – Nondiscrimination; Equal Employment Opportunity; Policies and Procedures);
- Ex. Order 13279 (equal protection of the laws for faith-based and community organizations); and
- 28 C.F.R. pt. 38 (DOJ Regulations – Equal Treatment for Faith-Based Organizations)

Policy for Addressing Discrimination Complaints

Complaints alleging discrimination against a facility, contracting agency or governmental unit providing services that Nevada Juvenile Justice Commission (NJJC) and the Juvenile Justice Programs Office (JJPO) funds may be filed by a client to the Juvenile Justice Programs Office or with the U.S. Department of Justice.

Office for Civil Rights; Office of Justice Programs; U.S. Department of Justice; 810 Seventh Street N.W.; Washington, DC 20531

Juvenile Justice Programs Office Chief; 4126 Technology Way, Carson City, Nevada 89706.

Complaints must be filed in writing, preferably on the JJPO Complaint Form JJPO-0001. The Complaint form can be filled out by the complainant, by his or her representative, or by appropriate JJPO staff members or Commission members. If the complainant is unwilling to complete the form, he or she may write, or have written, a letter stating the circumstances of the complaint. If the complaint is not filed on form JJPO-0001, then the appropriate JJPO staff will fill out this form and attach it to the complainant's letter. Complaints initially received by contracting agency employees must be filed immediately within ten (10) days with the JJPO Chief. The JJPO Chief will notify members of the Juvenile Justice Commission within five (5) days of receipt of complaint. Unless the complaint is being filed externally at federal level, all complaints should be filed at the local level. Experience shows that complaints have a good probability of being resolved at the level where they arose. Thus, no complaint should by-pass the first level, Complainant must show evidence that the complaint was filed at the local level first and include the documentation of the results at that level.

Any JJPO staff that handles complaints must maintain a complaint log to show identifying information, type, and status of each complaint filed at that level. A copy of the complaint must be maintained by the JJPO Chief, who will notify the Deputy Administrator of Juvenile Services and the Chair of the Juvenile Justice Commission. A copy of the complaint must also be kept with the grantee file. The JJPO has the primary responsibility of reviewing the complaints and reporting findings to the full Commission and the Deputy Administrator of Juvenile Services.

In accordance with federal regulations, a federal complaint with the Department of Justice must be filed no later than 180 calendar days after the alleged discrimination occurred. However, to allow a complainant time to file sequentially within the JJPO and externally to the U.S. Department of Justice if he or she chooses the complaint should be filed at the local level no later than 30 days after the alleged discrimination occurred. If it is filed beyond the 30 calendar day period, JJPO and the facility, agency, or governmental unit are encouraged to investigate and process the complaint if the filing is prompt enough to allow proceedings to be concluded and leave sufficient time for the complainant to file externally at the federal level.

If a complaint is filed both internally with the JJPO and externally with the U.S Department of Justice during the same time, the external complaint supersedes the internal complaint filing.

Accordingly, the internal complaint procedures will be suspended pending the outcome of the federal complaint.

When a complaint is received at the local level, the JJPO Chief will conduct and complete a fact finding investigation within 30 calendar days of receipt of the complaint and report the findings to the highest ranking official of the contracting agency or governmental unit and the Deputy Administrator of Juvenile Services. Within ten (10) business days after this report, the written findings will be given to the complainant. Complainant's rights to appeal, including instructions for filing, will also be provided at this time. If the report includes a finding of noncompliance, the report should include recommendations for remedial action by the Grantee. The Grantee must submit a remedial action plan, which includes steps to correct the problem and procedures to avoid future discriminatory issues within thirty (30) days. If the Grantee does not comply with this policy, then JJPO will notify the Grantee that funds will be suspended until compliance is met.

If a complainant chooses to appeal a finding or the proposed remedial actions by the JJPO and Commission, he or she should do so within the next 30 calendar days following receipt of the findings. If the appeal is filed beyond the 30 calendar day limit, the JJPO and Commission may still continue if the proceedings can be concluded and leave sufficient time for the complainant to file externally.

When a finding is appealed, a copy of the complaint, the findings, the proposed remedial action and the request for appeal must be forwarded to the Deputy Administrator of Juvenile Services and the Chair of the Juvenile Justice Commission. The Commission should review previous findings and conduct a complete fact-finding within 30 calendar days after receipt of such complaint or appeal. Procedures can include, but are not limited to; discussing the complaint with the complainant, the alleged offender, and the initial reviewer to determine the facts. Any findings shall be reported to the full Commission for action. When an appeal is concluded by the full Commission, the complainant will first be notified in writing of the findings and then a copy of the findings will be sent to the grantee or contractor. If the grantee or contractor does not comply with the decision of the Commission after the appeal is concluded, the funds will be suspended until compliance is achieved. If after appealing to the Commission, a complainant remains unsatisfied with the findings or the proposed remedial action, then he or she may file externally, with the U.S. Department of Justice within the stated time limit of 180 calendar days. The external appeal shall be explained to the complainant when notified of the findings of the appeal.

II. Notifying Sub-recipients of Civil Rights Requirements

The relationship between JJPO and sub-recipients consists of JJPO/JJC granting funds to said sub-recipients, explaining compliance requirements, supplying compliance materials (e.g self-surveys, posters and brochures), and monitoring programs implemented by sub-recipients.

The JJPO will include a section within the Request for Proposal the following information:

Recipients must comply (and will require any sub-grantees or contractors to comply) with any Federal nondiscrimination requirements, which may include:

- Omnibus Crime Control and Safe Streets Act (Safe Streets Act) of 1968 (42 U.S.C. § 3789d);
- The Victims of Crime Act (42 U.S.C. § 10604 (e));
- The Juvenile Justice and Delinquency Prevention Act of 2002 (42 U.S.C. § 5672 (b));

- The Civil Rights Act of 1964 (42 U.S.C. § 2000d);
- The Rehabilitation Act of 1973 (29 U.S.C. § 794);
- The Americans with Disabilities Act of 1990 (42 U.S.C. §§ 12131-34);
- The Education Amendments of 1972 (20 U.S.C. §§ 1681, 1683, 1685-86);
- The Age Discrimination Act of 1975 (42 U.S.C. §§ 6101-07);
- 28 C.F.R pt. 35 (DOJ Regulations – Nondiscrimination on the Basis of Disability in State and Local Government Services);
- 28 C.F.R. pt. 42 (DOJ Regulations – Nondiscrimination; Equal Employment Opportunity; Policies and Procedures);
- Ex. Order 13279 (equal protection of the laws for faith-based and community organizations); and
- 28 C.F.R. pt. 38 (DOJ Regulations – Equal Treatment for Faith-Based Organizations)

Adherence to Civil Rights Requirements are mandatory for any organization receiving funds from JJPO/JJC and will confirm compliance by signing the Required Assurances prior to receiving any funds. The sub-grantee must sign the form titled: *Nevada Juvenile Justice Programs Office-Assurance of Compliance under Title VI of the Civil Rights Act.*

The following is included within the Assurances that all sub-grantees must sign:

13. It will comply, and all its contractor will comply, with the nondiscrimination requirements of the Omnibus Crime Control and Safe Streets Act of 1968, as amended, 42 USC 3789(d), or Victims of Crime Act (as appropriate); Title VI of the Civil Rights Act of 1964, as amended; Section 504 of the Rehabilitation Act of 1973, as amended; Subtitle A, Title II of the American with Disabilities Act (ADA) (1990); Title IX of the Education Amendments of 1972; the Age Discrimination Act of 1975; Department of Justice Non-Discrimination Regulations, 28 CFR Part 42, Subparts C, D, E, and G; and Department of Justice regulations and disability discrimination, 28 CFR Part 35 & Part 39 and Equal Treatment for Faith-Based Organizations, 28 CFR Part 38.

III. Monitoring for Compliance with Civil Rights Requirements

Each sub-grantee will be responsible to complete a Title-VI Self Survey (included as an attachment) annually prior to receiving any funding through the JJC/JJPO. The Title-VI Self Survey will be reviewed by the JJPO Chief and serious compliance concerns will be shared with the JJC Chair. If serious compliance problems are identified, an exception letter will be sent to the sub-grantee that includes corrective action to regain compliance. Funding will not be released until the sub-grantee regains compliance.

The JJPO will ensure compliance with the Civil Rights Requirements by all funded sub-grantees by following the Civil Rights Monitoring Checklist (see attachment titled Federal Civil Rights Compliance Checklist) during the sub-grantees annual audit.

The results of this checklist will be included in the written report to the sub-grantee listing any findings or recommendations. A copy of these results will be placed in the sub-grantee file that is maintained by the JJPO.

IV. Training Sub-recipients on Civil Rights Requirements

All sub-grantees will receive Civil Right Compliance training upon receiving an award from the JJPO and NJJC. Sub-recipients are expected to be able to document the following during an on-site monitor or desk review:

1. Are notices of non-discrimination, including all applicable civil rights laws, posted in conspicuous places available to employees and applicants? Applicable civil right laws included Title VI of the Civil Rights Act of 1964; Title VII of the Civil Rights Act of 1964; Section 504 of the Rehabilitation Act of 1973; American Disabilities Act of 1990; Age Discrimination in Employment Act of 1967; Age Discrimination Act of 1975; Vietnam Era Veterans' Readjustment Assistance Act of 1974; and Title IX of the Education Amendments of 1972.
2. Are agency policies and procedures relevant to civil rights available for review?
3. Does the Agency provide and document training to staff on non-discriminatory issues and policies?
4. Have any formal discrimination complaints been filed against the agency? If so, have all relevant documents available for monitoring review.
5. Are eligibility requirements applied uniformly: services provided to all participants equally based on need; outside referrals made on a non-discriminatory basis and all client records maintained uniformly on all individuals?

Recipients are encouraged to contact the JJPO to request training and technical assistance in fulfilling your civil rights responsibilities as a recipient of Federal funding. If you have questions about these obligations, please call Pauline Salla, Juvenile Justice Specialist at 775-623-6555 or George J. Mazza, Senior Counsel within OCR, at (202) 307-0690, or visit the website at <http://www.ojp.usdoj.gov/ocr/>.

Ensuring Access to Federally Assisted Programs

As you know, Federal laws prohibit recipients of financial assistance from discriminating on the basis of race, color, national origin, religion, sex, or disability in funded programs or activities, not only in respect to employment practices but also in the delivery of services or benefits. Federal law also prohibits funded programs or activities from discriminating on the basis of age in the delivery of services or benefits.

Providing Services to Limited English Proficiency Individuals

As clarified by Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency, and resulting agency guidance, national origin discrimination includes discrimination on the basis of limited English proficiency (LEP). To ensure compliance with the Safe Streets Act and Title VI of the Civil Rights Act of 1964, recipients of Federal financial assistance must take reasonable steps to provide meaningful access to their programs and activities for LEP persons. Meaningful access may entail providing language assistance services, including oral and written translation, where necessary. Recipient is encouraged to consider the need for language services for LEP persons served or encountered both in developing your budgets and in conducting your activities. For more information on the civil rights responsibilities that recipients have in providing language services to LEP individuals, please see the website at <http://www.lep.gov>.

Ensuring Equal Treatment for Faith-Based Organizations

DOJ has published a regulation specifically pertaining to the funding of faith-based organizations. In general, the regulation, Participation in Justice Department Programs by Religious Organizations; Providing for Equal Treatment of all Justice Department Program Participants, and known as the Equal Treatment Regulation, 28 C.F.R. part 38, requires State Administering Agencies to treat these

organizations the same as any other applicant or recipient. The regulation prohibits State Administering Agencies from making award or grant administration decisions on the basis of an organization's religious character or affiliation, religious name, or the religious composition of its board of directors. The regulation also prohibits faith-based organizations from using financial assistance from DOJ to fund inherently religious activities. While faith-based organizations can engage in non-funded inherently religious activities, they must be held separately from the DOJ funded program, and customers or beneficiaries cannot be compelled to participate in them. The Equal Treatment Regulation also makes clear that organizations participating in programs funded by DOJ are not permitted to discriminate in the provision of services on the basis of a beneficiary's religion. For more information on the regulation, please see OCR's website at <http://www.ojp.usdoj.gov/ocr/etfbo.htm>.

State Administering Agencies and faith-based organizations should also note that the Safe Streets Act, as amended; the Victims of Crime Act, as amended; and the Juvenile Justice and Delinquency Prevention Act, as amended, contain prohibitions against discrimination on the basis of religion in employment. Despite these nondiscrimination provisions, DOJ has concluded that the Religious Freedom Restoration Act (RFRA) is reasonably construed, on a case-by-case basis, to require that its funding agencies permit faith-based organizations applying for funding under the applicable program statutes both to receive DOJ funds and to continue considering religion when hiring staff, even if the statute that authorizes the funding program generally forbids considering religion in employment decisions by grantees. Questions about the regulation or the application of RFRA to the statutes that prohibit discrimination in employment may be directed to OCR.

Enforcing Civil Rights Laws

All recipients of Federal financial assistance, regardless of the particular funding source, the amount of the grant award, or the number of employees in the workforce, are subject to the prohibitions against unlawful discrimination. Accordingly, OCR investigates recipients that are the subject of discrimination complaints from both individuals and groups. In addition, based on regulatory criteria, OCR selects a number of recipients each year for compliance reviews, which are audits that require recipients to submit data showing that they are providing services equitably to all segments of their service population and that their employment practices meet equal employment opportunity standards.

Public Notice

Recipients will inform the public and subcontractors of affected persons' rights to file a complaint of discrimination with OCR for investigation.

Equal Employment Opportunity Requirements

In addition to these general prohibitions, an organization which is a recipient of financial assistance subject to the nondiscrimination provisions of the Safe Streets Act or other Federal grant program requirements must meet two additional requirements:(1) complying with Federal regulations pertaining to the development of an Equal Employment Opportunity Plan (EEOP), 28 C.F.R. § 42.301-.308, and (2) submitting to OCR Findings of Discrimination (see 28 C.F.R. §§ 42.205(5) or 31.202(5)).

1.) Meeting the EEOP Requirement

Recipients will provide a certification to OCR that it has a current EEOP on file, if required to maintain one.

For recipients of DOJ grant funds from the Juvenile Justice Programs Office(JJPO) and Nevada Juvenile Justice Commission (NJJC), , the following chart shows at a glance the responsibilities a recipient has in complying with the federal regulations pertaining to the EEOP requirement:

For assistance in developing an EEOP, please consult OCR's website at

What is the recipient type?	What is the award amount?	What is the number of employees?	Does the recipient need to develop an EEOP?	Does the recipient need to submit a Certification Form to OCR?	Must the recipient submit an EEOP to OCR?
Nonprofit, Indian Tribe, Medical or Education Institution	Does not matter	Does not matter	NO	YES (Section A)	NO
State or local government and private entity	Less than \$25,000	Does not matter	NO	YES (Section A)	NO
State or local government and private entity	Does not matter	Less than 50 employees	NO	YES (Section A)	NO
State or local government and private entity	\$25,000 or more, but less than \$500,000, for an individual grant	50 or more employees	YES	YES (Section B) Certifying that the recipient has created an EEOP and is maintaining it on file in a designated office for review by employees, applicants, OCR, or a state administrative agency	NO
State or local government and private entity	\$500,000 or more for an individual grant	50 or more employees	YES	NO	YES

<http://www.ojp.usdoj.gov/ocr/eeop.htm>. You may also request technical assistance from OCR's equal employment assistant by dialing (202) 616-3208.

2) Submitting Findings of Discrimination

In the event a Federal or State court or Federal or State administrative agency makes a finding of discrimination after a due process hearing, on the ground of race, color, religion, national origin, sex, or disability against a recipient of funds, the recipient will forward a copy of the finding to OCR, OJP and the IDJC.

Retaliation

Recipients shall not retaliate against individuals for taking action or participating in action to secure rights protected by applicable laws.

Discrimination Complaint Procedures

Employees and beneficiaries of programs should follow the complaint procedures of the recipient organization; unless circumstances exist that make reporting to the recipient organization inappropriate. If reporting to the recipient organization is inappropriate, the reporting party should direct the complaint to the JJPO and/or the Equal Employment Opportunity Commission (EEOC), as necessary. If a reporting party needs assistance filing a complaint with the EEOC, the JJPO will assist, to the extent necessary, with referring the reporting party to the EEOC.

For more information regarding any of the above information, please contact the Juvenile Justice programs Office at 775-623-6555 or JJPO Chief, Pauline Salla at psalla@dcfs.nv.gov

NEVADA JUVENILE JUSTICE PROGRAMS
CIVIL RIGHTS COMPLAINT FORM JJPO- 0001

Date: _____

TO: NEVADA JUVENILE PROGRAMS OFFICE

I, _____, hereby file an official complaint against

Name of Person or Agency

Located at: _____

Complainant's Address: _____

Basis of Complaint: _____

Date of alleged discrimination: _____

Signed: _____

Section Below to be Completed by the Juvenile Justice Programs Office

Referred to _____ on _____ for investigation and report.
Local Coordinator Date

Use back of Sheet if necessary.

Juvenile Justice Programs Office Chief

**NEVADA JUVENILE JUSTICE PROGRAMS OFFICE
ASSURANCE OF COMPLIANCE UNDER TITLE VI OF THE
CIVIL RIGHTS ACT**

Name of Applicant (Hereinafter called "Applicant.")

hereby agrees that it will comply with Title VI of the Civil Rights Act of 1964 (P.L. 88-352) and all requirements imposed by the Regulations of the U.S. Department of Justice (28 CFR Parts 42 & 50). The Nevada Juvenile Justice Commission (JJC) and the Nevada Juvenile Justice Programs Office (JJPO), and any directives or regulations issued pursuant to that Act and the Regulations, to the effect that:

no person in the United States shall, on the ground of race, color or national origin, be excluded from the opportunity to participate in, be denied the benefits of, or be otherwise subject to discrimination under any program or activity for which the Applicant received Federal financial assistance from JJC/JJPO.

Assurance is hereby given that it will immediately take any measures necessary to effectuate this agreement.

This Assurance is given in consideration of and for the purpose of obtaining any and all Federal financial assistance, grants and loans of Federal funds, reimbursable expenditures, grant or donation of Federal property and interest in property, the detail of Federal personnel, the sale, lease of, and permission to use Federal property or interest in such property or the furnishing of services without consideration or at a nominal consideration, or at a consideration which is reduced for the purpose of assisting the recipient, or in recognition of the public interest to be served by such sale, lease, or furnishing of services to the recipient, or any improvements made with Federal financial assistance extended to the Applicant by JJC.

By accepting this Assurance, the Applicant agrees to compile data, maintain records, and submit reports as required to permit effective enforcement of Title VI, and permit authorized JJC/JJPO personnel to review such records, books, and accounts as needed to ascertain compliance with Title VI. If there are any violations of this Assurance, JJC shall have the right to seek administrative and/or judicial enforcement of this Assurance.

This Assurance is binding on the Applicant, its successors, transferees, and assignees as long as it receives assistance from JJC. In the case of real property, this Assurance is binding for as long as the property is used for a purpose for which this assistance was intended or for the provision of services or benefits similar to those originally intended. In the case of personal property, this Assurance applies for as long as the recipient retains ownership or possession of the property. The person or persons whose signatures appear below are authorized to sign this Assurance on behalf of the Applicant.

Applicant

Date

By: Title of Authorized Official

Address of Applicant

**NEVADA JUVENILE JUSTICE PROGRAMS OFFICE
Title VI Self-Survey**

Please mark (x) on type of funding: FF__ Formula __ JABG __ EUDL __

Survey Date: ___ / ___ / ____

Implementing Agency	Street Address	City	County	Zip code
Head of Agency	Title	JJPO Monitor	Title	
1.) Is this a minority owned agency? Yes ___ No ___	2.) Is this a minority-managed agency? Yes ___ No ___	3.) Does the agency serve primarily minority youth? Yes ___ No ___		
4.) What is the racial composition of the Advisory Group or Governing Board? (use whole numbers only) Total ___ Caucasian ___ African American ___ Hispanic ___ Multi-racial ___ Other ___				
5.) If no minority persons are on the Advisory Group or Board and if minorities represent at least 5% of the population in the geographic service area, what steps will be taken to obtain minority representation on the Advisory Group or Board? _____				
6.) Does your agency have a written policy stating that service will be provided to all persons without regard to race, color, or national origin? Yes ___ No ___ If yes, attach a copy!				
7.) Are notices of non-discrimination posted in conspicuous places, available to all staff and clients? Yes ___ No ___				
8.) Do you have a Title VI poster and brochure from JJPO? Yes ___ No ___	9.) Do your Title VI posters throw the name of the JJPO Monitor to whom complaints should be referred? Yes ___ No ___			
10.) Are permanent records kept of all Title VI complaints? Yes ___ No ___	11.) Does the grantee have an Affirmative Action Plan? Yes ___ No ___	12.) Is there a 504 Self Evaluation on file? Yes ___ No ___		
13.) Does your agency have policies and procedures relevant to all Civil Rights laws, such as, Title VI & Title VII of the Civil Rights Acts of 1964, Rehabilitation Act of 1973, Age Discrimination Act of 1975, American Disabilities Act, and Nevada Public Chapter 502? Yes ___ No ___				

**NEVADA JUVENILE JUSTICE PROGRAMS OFFICE
Title VI Self-Survey**

Please mark (x) on type of funding: FF__ Formula __ JABG __ EUDL __

Survey Date: ___ / ___ / _____

<p>14.) Is Title VI information disseminated to your employees and your clients/applicants? Yes __ No __ If yes, how are employees informed? _____ How are clients/applicants informed? _____</p>	
<p>15.) Are staff members periodically re-oriented or refreshed on information detailing their Title VI responsibilities? Yes __ No __ If yes, state by whom and how often? _____</p>	
<p>16.) Are all physical areas (exits, waiting rooms, restrooms, etc.) provided and used without regard to race, color or national origin of clients? Yes __ No __</p>	
<p>17.) Does the agency disseminate information concerning the program and services in a manner to effectively reach minority communities? Yes __ No __</p>	
<p>18.) Please indicate as of this date the racial composition of children/youth served by your program or agency. (use whole numbers only) # Caucasian __ # Hispanic __ # African American __ # Asian __ # Multi-racial __ # Other __</p>	
<p>19.) Please indicate as of this date the racial composition of staff/employees, excluding the Advisory Group or Board covered by the previous question, serving children and youth in your program or agency. (use whole numbers only) # Caucasian __ # Hispanic __ # African American __ # Asian __ # Multi-racial __ # Other __</p>	
<p>20.) Please indicate as of this date the racial composition of volunteers your program or agency has. (use whole numbers only) # Caucasian __ # Hispanic __ # African American __ # Asian __ # Multi-racial __ # Other __</p>	
<p>21.) How does your program or agency affect minorities or females?</p>	<p>22.) When did you last conduct civil rights training for your staff? Date: ___ / ___ / _____</p>

NEVADA JUVENILE JUSTICE PROGRAMS OFFICE
Title VI Self-Survey

Please mark (x) on type of funding: FF__ Formula __ JABG __ EUDL __

Survey Date: ___ / ___ / ____

23.) Have there been any client grievances filed against your agency? Yes __ No __
If yes, how many? _____ What were the nature of the grievances, dates and other pertinent information?

24.) Is there a particular Title VI area in which you would like assistance? Please Describe:

I declare that I have reviewed and approved the information provided in this Self-Survey and to the best of my knowledge and belief, it is true, correct, and complete.

Signature:

Date:

Telephone number: (_____) _____ - _____ Email Address: _____

IMPORTANT!! This Self-Survey must be submitted to the JJPO Chief within 90 days of receiving funding from JJPO.

Federal Civil Rights Compliance Checklist
Juvenile Justice Programs Office

1. If the sub-recipient is required to prepare an Equal Employment Opportunity Plan (EEOP) in accordance with 28 C.F.R. §§ 42.301-.308, does the sub-recipient have an EEOP on file for review?

Yes No

If yes, on what date did the sub-recipient prepare the EEOP?

2. Has the sub-recipient submitted an EEOP Short Form to the Office for Civil Rights (OCR), Office of Justice Programs (OJP), U.S. Department of Justice (DOJ), if required by 28 C.F.R. §§ 42.301-.308? If the sub-recipient is not required to submit an EEOP Short Form to the OCR; has it submitted a certification form to the OCR claiming a partial or complete exemption from the EEOP requirements?

Yes- submitted an EEOP Short Form Yes- submitted a certification No

If the sub-recipient prepared an EEOP Short Form, on what date did the sub-recipient prepare it?

3. How does the sub-recipient notify program participants and beneficiaries that it does not discriminate on the basis of race, color, national origin, religion, sex, disability, and age in the delivery of services (e.g. posters, inclusion in brochures or other program materials, etc.)?

Comments:

4. How does the sub-recipient notify employees that it does not discriminate on the basis of race, color, national origin, religion, sex, and disability in employment practices (e.g. posters, dissemination of relevant orders or policies, inclusion in recruitment materials, etc.)?

Comments:

5. Does the sub-recipient have written policies or procedures in place for notifying program beneficiaries how to file complaints alleging discrimination by the sub-recipient with the [State Administering Agency] or the OCR?

Yes No

If yes, an explanation of these policies and procedures:

6. If the sub-recipient has 50 or more employees and receives DOJ funding of \$25,000 or more, has the sub-recipient taken the following actions:

- a. 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 a disability in employment practices and the delivery of services.

Yes No

- b. 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. Notified participants, beneficiaries, employees, applicants, and others that the sub-recipient does not discriminate on the basis of disability.

Yes No

Comments:

7. If the sub-recipient operates an education program or activity, has the sub-recipient taken the following actions:

- a. 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.

Yes No

- b. Designated a person to coordinate compliance with the prohibitions against sex discrimination contained in 28 C.F.R. Part 54.

Yes No

- c. Notified applicants for admission and employment, employees, students, parents, and others that the sub-recipient does not discriminate on the basis of sex in its educational programs or activities.

Yes No

Comments:

8. Has the sub-recipient complied with the requirement to submit to the OCR any findings of discrimination against the sub-recipient issued by a federal or state court or federal or state administrative agency on the grounds of race, color, religion, national origin, or sex?

Yes No

Comments:

9. What steps has the sub-recipient taken to provide meaningful access to its programs and activities to persons who have limited English proficiency (LEP)?

Comments, including an indication of whether the sub-recipient has developed a written policy on providing language access services to LEP persons:

10. Does the sub-recipient conduct any training for its employees on the requirements under federal civil rights laws?

Yes No

Comments:

11. If the sub-recipient conducts religious activities as part of its programs or services, does the sub-recipient do the following:

a. Provide services to everyone regardless of religion or religious belief.

Yes No

b. 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. Ensure that participation in religious activities is voluntary for beneficiaries of federally-funded programs.

Yes No

Comments: