

Michigan Department of Health and Human Services (MDHHS)
Crime Victim Services Commission (CVSC)
Victims of Crime Act
Crime Victim Assistance Grant Program

Methods of Administration for Ensuring Victims of Crime Act Victim Assistance
Sub-recipients Comply with Applicable Federal Civil Rights Laws

The Crime Victim Services Commission (CVSC), in cooperation with the Office for Civil Rights, Office of Justice Programs, U.S. Department of Justice (OCR) has developed a method of administration for ensuring that VOCA Crime Victim Assistance grant sub-recipients comply with applicable federal civil rights laws. The period of performance for VOCA Crime Victim Assistance grant Agreements with sub-recipients is the Federal and State fiscal year of October 1 to September 30.

I. Policy for Addressing Discrimination Complaints

In December, 2013, the CVSC developed the written *Program Discrimination Complaint Policies and Procedures*, a comprehensive policy and procedure for receiving complaints from individuals who are receiving funded **services** at or are **employees** of a VOCA Crime Victim Assistance grant sub-recipient. CVSC will maintain an online public copy of the policy and a downloadable Federal Civil Rights Complaint form that may be manually completed and forwarded to the Civil Rights Complaint Coordinator. CVSC will provide VOCA Crime Victim Assistance grant sub-recipients with a printed copy of the procedure for distribution and display at their facilities.

The Civil Rights Complaint Coordinator for the Michigan Department of Community Health is designated in the policy as the coordinating office for the civil rights compliance process. The Department of Community Health's EEO Officer shall serve as the Civil Rights Complaint Coordinator. The Civil Rights Complaint Coordinator must fully comply with *Program Discrimination Complaint Policies and Procedures and the Employment Discrimination Complaint Policies and Procedures*, pertaining to handling of complaints, and which establishes an orderly, efficient and effective procedure for receiving, documenting, processing and resolving complaints filed.

VOCA Crime Victim Assistance Grant
Method of Administration

Civil Rights Complaint Coordinator

Michigan Department of Health and Human Services

Lance Bettison, EEO Officer

1312 Oakland Dr.

Kalamazoo, MI 49008

(269) 337-4091 (Voice)

www.michigan.gov/mdhhs-eeo

Discrimination Complaints should be forwarded to the Civil Rights Complaint Coordinator. The Civil Rights Complaint Coordinator shall also refer discrimination complainants in grant funded services to the Federal OCR. The Civil Rights Complaint Coordinator will be available to assist individuals in completing the Program Discrimination Complaint form and shall further forward complaints to the appropriate state or federal agency as appropriate. The Civil Rights Complaint Coordinator will provide individuals with information about Employment Discrimination complaints.

The Civil Rights Complaint Coordinator shall follow the Program or Employment Discrimination Complaint Policies and Procedures to respond to complaints. The Civil Rights Complaint Coordinator shall send the complainant a letter acknowledging receipt of the complaint. The letter to the complainant will also notify the complainant that he or she may also file a complaint with the Office of Justice Programs (OJP) Office of Civil Rights (OCR) by submitting a written complaint to:

Office of Justice Programs

Office of Civil Rights

810 7th Street, N.W.

Washington, DC 20531

(202) 307-0690 (Voice)

(202) 354-4380 (Fax)

(202) 307-2027 (TTY)

URL LINK: <http://www.ojp.usdoj.gov/about/ocr/complaint.htm>

At least once annually a Civil Rights Training Webinar will be held for sub-recipients where annual updates regarding recent changes in civil rights laws and the procedures for handling issues of discrimination and civil rights violations. These trainings will inform VOCA Crime Victim Assistance grant sub-recipients that when an employee, client, customer, or program participant files a discrimination complaint directly with the sub-recipient, the sub-recipient shall have procedures in place to either investigate the complaint or forward the complaint to the MDCH Civil Rights Complaint Coordinator for processing. All sub-recipients are required to certify in writing that they have received federal civil rights training.

On an annual basis, the CVSC will require all sub-recipients to disclose their own applied procedures for responding to discrimination complaints from employees, clients, customers, and program participants. The CVSC will instruct VOCA Crime Victim Assistance sub-recipients that they must forward **any and all complaints** that are received by the sub-recipient to the MDCH Civil Rights Complaint Coordinator within **five** business days of the sub-recipient receiving the complaint. All VOCA Crime Victim Assistance grant sub-recipients must also certify that they have or will notify all employees, clients, customers, and program participants that discrimination is prohibited and will also advise them of the procedures for filing a complaint of discrimination.

II. Notifying VOCA Crime Victim Assistance grant sub-recipients of Civil Rights Requirements

VOCA Crime Victim Assistance grant sub-recipients certify and assure through their executed VOCA Grant Agreement certify compliance with civil rights non-discrimination obligations and of prohibited discrimination. Applicants for the VOCA Crime Victim Assistance grant program are notified of their civil rights non-discrimination obligations and of prohibited discrimination at the time of application. The VOCA Crime Victim Assistance grant Agreement incorporates all required federal and state award special conditions.

III. Monitoring for Compliance with Civil Rights Requirements

The CVSC has implemented a three-part process which monitors and ensures VOCA Crime Victim Assistance sub-recipients' compliance with Civil Rights requirements. First, VOCA Crime Victim Assistance grant sub-recipients must annually submit the *Federal Civil Rights Compliance* documents providing a description their policies and procedures for complying with the federal civil rights obligations. Second, CVSC staff and DCH EEO Officer will review the submitted Federal Civil Rights Compliance procedures, documents for compliance with federal Civil Rights Requirements. Third,

CVSC staff will perform an on-site visit to the VOCA Crime Victim Assistance grant sub-recipient's location in order to factually verify that sub-recipients are doing what is described in their VOCA Crime Victim Assistance grant application. The CVSC staff will document their review on the Federal Civil Rights Compliance Monitoring Checklist.

IV. Training VOCA Crime Victim Assistance Sub-recipients on Civil Rights Requirements

In offering training to sub-recipients, the CVSC will provide at a minimum once annually a VOCA Crime Victim Assistance Grant Federal Civil Rights Compliance Training Webinar. The purpose of the webinar is to instruct VOCA Crime Victim Assistance sub-recipients on their responsibility for upholding the civil rights laws and for observing non-discrimination obligations. The training for VOCA Crime Victim Assistance sub-recipients will also cover the *Program Discrimination Complaint Policies and Procedures*, including an employee's responsibility to refer discrimination complaints to the Civil Rights Complaint Coordinator or to the appropriate State or Federal agency.

The CVSC will take or record attendance to verify that sub-recipients have attended the VOCA Crime Victim Assistance grant Federal Civil Rights Compliance Training Webinar. If sub-recipients are unable to attend the training, the sub-recipient shall be required to certify that they have received and read copies of the annual Federal Civil Rights Compliance Training Webinar PowerPoint and other relevant documents. In addition, the CVSC will make copies of the PowerPoint slides and other training materials available on its website.

Reference documents:

- Attachment 1: Methods of Administration for Ensuring VOCA Crime Victim Assistance Grant Sub-recipients Comply with Applicable Federal Civil Rights Laws
- Attachment 2: Program Discrimination Complaint Policies and Procedures
- Attachment 3: Employment Discrimination Complaint Policies and Procedures
- Attachment 4: Federal Civil Rights Complaint form
- Attachment 5: Federal Civil Rights Laws Training Power Point Training
- Attachment 6: Civil Rights Power Point Training Acknowledgement form
- Attachment 7: Assurances for Faith Based Organizations
- Attachment 8: Fact Sheet – EEOP
- Attachment 9: Federal Civil Rights Monitoring Checklist