

## EEO and Related Compliance for Grants

### Questions Your County Needs to Answer Before Applying for a Grant:

Have you adopted employee, applicant, customer, and citizen grievance reporting procedures that allow for the prompt and equitable investigation and resolution of internally reported Equal Employment Opportunity (EEO) grievances about race, color, religion, gender, age, disability, harassment, and retaliation concerns?

Do those procedures inform constituencies of their rights and the limitations of the Colorado Open Records Act on discussing and reporting employment disciplinary decisions?

Have you designated a person to coordinate compliance with sex discrimination under C.F.R Part 54?

Have you notified applicants for employment, employees, and service or program users, contractors, and others that grant-funded agencies do not discriminate on the basis of sex [and other EEO categories] in its educational programs or activities?

Has your grant-funded agency complied with the requirement to submit to the Office for Civil Rights any findings of discrimination against the grant funded agency issued by a federal or state court, or federal or state administrative agency on the grounds of race, color, religion, gender, age, disability, harassment, or retaliation?

Does your grant-funded agency comply with the requirements regarding freedom of religion and separation of church and state under federal law? (detailed questions may be asked for a grant)

Does your agency have a conflict of interest policy that meets the state and federal requirements, including those of the Hatch Act?

Does your agency conduct any training for its employees on the requirements under federal civil rights laws?

*(Note: According to the Division of Criminal Justice checklist dated December 16, 2010, the Office of Justice Programs has a broad view of this requirement. They have determined that if your agency provides any type of structured training to employees about civil rights, then the requirement is met. Some examples include: bringing in a formal speaker to present on this topic, coverage in new employee orientation, non-discrimination policies that are provided to staff; outside trainings; and conferences that staff attend related to civil rights.)*

However, be prepared to answer follow-up questions during an audit such as:

Is there any periodic training provided to the rest of the employees of the requesting agency or local government regarding civil rights? If so, what does the specific training cover, how many times is it offered during the course of a year, and do you have a document showing what detailed information is covered in training, which is required to meet this standard?

### What This Means For Counties

Read through the grant application and carefully make a list of every detailed item with which the county must comply before submitting your application. Requirements range across many legal areas; including but not limited to Title VII and EEO compliance, the National Environmental Policy Act, the National Historical Preservation act rules, HIPAA, ERISA, bookkeeping and funding management conditions, displaced persons laws, and conflict of interest conditions, including the Hatch Act.

For more information, contact CTSI at 303-861-0507.