

The North Dakota Office of Attorney General's (OAG) Grants Management section is responsible for monitoring its subrecipients' compliance with federal nondiscrimination statutes.

## **POLICY**

As a condition of accepting USDOJ funding, subrecipients are required to comply with applicable federal laws against discrimination and discriminatory practices, which ensure individuals have the right to participate in programs and activities of subrecipients without regard to race, color, national origin, sex, religion, disability, or age, as provided under federal law. Organizations and agencies are prohibited from retaliating against an individual for taking action or participating in action to secure rights protected by those laws.

Details on what a complaint against an OAG subrecipient must contain, the deadlines for filing a complaint, and the OAG's or subrecipients' responsibility to process a complaint are provided in the complaint policy found on the OAG's website at

<https://attorneygeneral.nd.gov/sites/ag/files/documents/GrantComplaintPolicy.pdf>

The following grants are affected by this policy:

1. Byrne Justice Assistance Grant
2. Project Safe Neighborhoods
3. Other U.S. Department of Justice federal grant programs awarded to subrecipients

## **NOTIFYING SUBRECIPIENTS OF CIVIL RIGHTS REQUIREMENTS**

The OAG grants management section will utilize subgrant applications, agreements and acceptance documents to notify USDOJ grant subrecipients of

1. prohibited discrimination in their programs and activities,
2. the requirement that subrecipients have procedures in place to respond to complaints of discrimination involving services or employment practices,
3. and the requirement that subrecipients provide public notice to their program participants, beneficiaries, and employees of its non-discrimination policies in employment practices and delivery of services, through posters, dissemination of policies, or referencing the procedures in recruitment and program materials.

## **MONITORING COMPLIANCE WITH CIVIL RIGHTS REQUIREMENTS**

The OAG grants management section will utilize a monitoring checklist and additional information it gathers onsite from the grant subrecipients to review compliance with these requirements and to ensure that subrecipients notify employees, clients, customers, program participants, applicants, and consumers of their complaint procedures.

1. Grant Managers will schedule an on-site or desk review with each subrecipient every-other year.
2. A monitoring checklist will be provided to the subrecipient prior to the review.

Methods of Administration for Civil Rights Compliance  
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3. After the review is completed, a summary monitoring report will be provided to the subrecipient's authorized official and project director, with findings noted if any.
4. If findings exist, corrective action will be required, and will be developed by the subrecipient and approved by the Grant Manager.
5. After corrective actions are implemented by the subrecipient and approved by the Grant Manager, a final summary monitoring report will be provided to the subrecipient's authorized official and project director.

## **TRAINING SUBRECIPIENTS ON CIVIL RIGHTS REQUIREMENTS**

1. OAG grant management staff will ensure, through the OAG's application process, award and acceptance documents, and through the subrecipient grantee monitoring process, that applicant and subrecipients are notified of their civil rights requirements. The complaint policy will also be posted on the OAG's website. <https://attorneygeneral.nd.gov/sites/ag/files/documents/GrantComplaintPolicy.pdf>
2. The OAG will post the link to a training module from the USDOJ OCR on its web site. <http://www.ojp.gov/about/ocr/assistance.htm>
3. OAG grant management staff will notify subrecipients through its grant solicitations, and award and acceptance documents, of the requirement to complete the USDOJ OCR training annually.
4. OAG grant management staff will review subrecipient compliance with this requirement during monitored desk and on-site reviews.

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