



ILLINOIS CRIMINAL JUSTICE INFORMATION AUTHORITY

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Instructions for Completing the Federal Civil Rights Compliance Questionnaire

Why do I need to complete this form? The Illinois Criminal Justice Information Authority (ICJIA), as the State Adminstrating Agency, is responsible for verifying that our grantees are complying with applicable federal civil rights laws. The questionnaire has been created to ensure compliance with federal civil rights laws and regulations. Some of the questions are very detailed and can only be answered by a person with specific knowledge of the subject. The Civil Rights Compliance Questionnaire (CRCQ) must be approved prior to grant execution. ICJIA will verify the answers during a site visit.

Who should complete this form? This form should be completed by the designated Civil Rights Coordinator for the Program Agency. The answers should provide as much detail as possible.

How often does this form need to be completed? A valid CRCQ must be on file at ICJIA prior to any grant being executed. ICJIA will maintain the most recent copy on file for reference. It is important that you mark all grant funds that your agency receives from ICJIA, so that work is not duplicated. Only one form needs to be completed by a grantee no matter how many grants, the grantee has received.

What if I have questions? Please forward any question to your grant specialist.

Definitions

Equal Employment Opportunity Commission (EEOC) — A federal entity that is responsible for ensuring compliance with applicable federal employment laws.

EEOP – Equal Employment Opportunity Plan.

Limited English Proficient (LEP) – is a person who has a first language other than English and a limited ability to read, write, speak, or understand the English language.

Notification to beneficiaries – can be accomplished through posters, or inclusion in brochures or other program material, etc. publicly visible in the agency's office, or verbally providing information about your agency's non-discrimination policies in providing services.

Notification to employees – can be accomplished through posters, dissemination of relevant orders or policies, inclusion in recruitment materials, etc.

Department of Justice, Office of Justice Programs, Office for Civil Rights (OCR) – a federal governmental entity that is responsible for ensuring that all direct recipients and subrecipients of federal funds from the Department of Justice comply with all applicable federal civil rights law.

ICJIA grantees have the legal and contractual obligation to comply with the following laws, as applicable:

- **28 C.F.R. Part 42 Subpart G** – Nondiscrimination based on disability (listed as handicap in the regulation) in federally assisted programs or activities. Person with a disability is any person who has a physical or mental impairment which substantially limits one or more major life activity, or has a record of such impairment, or is regarded as having such impairment.
- **Title VI of the Civil Rights Act (Title VI) of 1964**, as amended, 42 U.S.C. § 2000d, and the DOJ implementing regulation, 28 C.F.R. pt. 42, subpts. C & D (prohibiting discrimination in federally assisted programs based on race, color, and national origin in the delivery of services or benefits);
- **Omnibus Crime Control and Safe Streets Act (Safe Streets Act) of 1968**, as amended, 34 U.S.C. §§ 10228(c) & 10221(a), and the DOJ implementing regulations, 28 C.F.R. pt. 42, subpts. D (prohibiting discrimination in programs funded under the statute, both in employment and in the delivery of services or benefits, based on race, color, national origin, sex, and religion) & E (requiring certain DOJ-funded programs subject to the administrative provisions of the statute to prepare, maintain, and submit an Equal Employment Opportunity Plan (EEO));
- **Section 504 of the Rehabilitation Act (Section 504) of 1973**, as amended, 29 U.S.C. § 794, and the DOJ implementing regulation, 28 C.F.R. pt. 42, subpt. G (prohibiting discrimination in federally assisted programs based on disability both in employment and in the delivery of services or benefits);
- **Title IX of the Education Amendments (Title IX) of 1972**, as amended, 20 U.S.C. § 1681, and the DOJ implementing regulations, 28 C.F.R. pt. 42, subpt. D & pt. 54 (prohibiting discrimination in federally assisted education programs based on sex both in employment and in the delivery of services or benefits);
- **Title II of the Americans with Disabilities Act of 1990**, as amended, 42 U.S.C. § 12132, and the implementing regulation at 28 C.F.R. § 35.171(a)(1)(i), (3)(i) (prohibiting discrimination based on disability both in employment and in the delivery of services or benefits);
- **Age Discrimination Act (Age Act) of 1975**, as amended, 42 U.S.C. § 6102, and the DOJ implementing regulation, 28 C.F.R. pt. 42, subpt. I (prohibiting discrimination in federally assisted programs based on age in the delivery of services or benefits);
- **Juvenile Justice and Delinquency Prevention Act (JJJPA) of 1974**, as amended, 34 U.S.C. § 11182(b), and the DOJ implementing regulations, 28 C.F.R. §§ 31.202, .403 & pt.42, subpt. D (prohibiting discrimination in programs funded under the statute, both in employment and in the delivery of services or benefits, based on race, color, national origin, sex, and religion);
- **Victims of Crime Act (VOCA) of 1984, as amended**, 34 U.S.C. § 20110(e) and the regulation implementing the Victim of Crime Act Victim Assistance Program, 28 C.F.R. § 94.114 (prohibiting discrimination in programs funded under the statute, both in employment and in the delivery of services or benefits, based on race, color, national origin, sex, religion, and disability);
- **Violence Against Women Act (VAWA) of 1994**, as amended, 34 U.S.C. §12291(b)(13) (prohibiting discrimination in programs either funded under the statute or administered by the Office on Violence Against Women, both in employment and in the delivery of services or benefits, based on actual or perceived race, color, national origin, sex, religion, disability, sexual orientation, and gender identity) (referring to the Safe Streets Act for enforcement); and
- **Executive Order 13,559**, amending Executive Order 13,279, and the DOJ implementing regulation, Partnerships with Faith-Based and Other Neighborhood Organizations, 28 C.F.R. pt. 38 (prohibiting discrimination in federally assisted social service programs based on religion in the delivery of services or benefits).
- **The Illinois Human Rights Act**, 775 ILCS 5 *et seq.*; prohibits discrimination in Illinois based on actual or perceived race, color, religion, sex, national origin, ancestry, age, order of protection status, marital status, disability, military status, sexual orientation, gender identity, pregnancy, or unfavorable discharge from military service in connection with employment, real estate transactions, access to financial credit, and the availability of public accommodations.

- **The Public Works Employment Discrimination Act, 775 ILCS 10 et. seq.;** prohibits discrimination based on actual or perceived race, color, religion, sex, national origin, ancestry, age, order of protection status, marital status, physical or mental disability, military status, sexual orientation, pregnancy, or unfavorable discharge from military service in the refusal or denial of employment or in connection with work performed on behalf of a State agency.
- **The Illinois Environmental Barriers Act, 410 ILCS 25 et seq.;** allows for the enforcement and development of the Illinois Accessibility Code which dictates minimum design, construction, and alteration requirements to facilitate access to and use of public facilities and multistory housing by individuals with disabilities.

Agency Name: _____

Designated Civil Rights Coordinator

Name: _____
 Address: _____
 Phone: _____
 Email: _____

Grant type: (Select All that apply)

Federal Grants

- | | | | |
|---|--------------------------------|-----------------------------------|--------------------------------|
| <input type="checkbox"/> JAG | <input type="checkbox"/> NARIP | <input type="checkbox"/> NSFIA | <input type="checkbox"/> RSAT |
| <input type="checkbox"/> SJS | <input type="checkbox"/> VOCA | <input type="checkbox"/> PREA | <input type="checkbox"/> VADGT |
| <input type="checkbox"/> SORNA | <input type="checkbox"/> VAWA | <input type="checkbox"/> VAWASASP | <input type="checkbox"/> NCHIP |
| <input type="checkbox"/> Other: (specify) | | | |

ICJIA Grant Numbers: _____

Federal Civil Rights Compliance Questions

1. Has your agency received a civil rights compliance certification from any Federal, State, or local government agency?

Yes No

If yes, provide proof of the certification.

2. Agencies are required to submit to ICJIA any adverse findings of discrimination made against the agency based on race, color, national origin, religion, or sex (including sexual orientation and gender identity) that are the result of a due process hearing conducted by a federal or state court, federal or state administrative agency or local government administrative agency. Has your agency been found to have engaged in prohibited discrimination against an employee or program beneficiary by any federal or state court, federal or state administrative agency or local government administrative agency within the last three years?

Yes No

If yes, please provide documentation of any findings issued within the last three years.

3. Does your agency have fifty or more employees and receive DOJ funding of \$25,000 or more?

Yes No

If no, please move to question 4. If yes, has your agency 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. pt. 42, subpt. G, which prohibit discrimination on the basis of 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. pt. 42, subpt. G?

Yes No

- c. Notified program participants, beneficiaries, employees, job applicants, and others that your agency does not discriminate on the basis of disability?

Yes No

If you checked "No" for any of the above, please provide a target date for compliance:

4. The EEOP Certification Form is a certification provided by ICJIA that must be completed on an annual basis. Has your agency submitted an EEOP Certification Form certifying compliance with the Equal Opportunity Program (EEOP requirements)?

Yes No

If no, please explain why the EEOP Certification Form has not been submitted to ICJIA. Please be advised that the EEOP Certification Form must be submitted to ICJIA prior to grant execution.

5. The EEOP Utilization Report (Report) is a report that must be submitted every two years, unless your agency is exempt from filing the Report. If your agency is required to submit a Report to ICJIA in accordance with 28 C.F.R. pt. 42, subpt. E, has your agency done so? (If your agency is a for-profit entity or a governmental organization with 50 or more employees and receives DOJ funding of \$25,000 or more from a single award, you are required to submit a Report to the DOJ.¹)

Yes, Agency has submitted the Report to ICJIA

Date of submission: _____

Date of most recent Report Approval Letter: _____

No, Agency is exempt from filing the Report.

No, Agency is required to submit the Report, but has not submitted the Report to ICJIA. Please explain why your agency has not submitted the Report to ICJIA. Please be advised the Report must be submitted to the ICJIA prior to grant execution.

6. How does your agency notify **program participants and beneficiaries** that your agency does not discriminate in the delivery of services based on actual or perceived race, color, religion, sex, national origin, ancestry, age, order of protection status, marital status, disability, military status, sexual orientation, gender identity, pregnancy, or unfavorable discharge from military service?
7. How does your agency notify **employees and prospective employees** that your agency does not discriminate based on actual or perceived race, color, religion, sex, national origin, ancestry, age, order of protection status, marital status, disability, military status, sexual orientation, gender identity, pregnancy, or unfavorable discharge from military service?
8. Does your agency have written policies or procedures in place for notifying **employees and job applicants** on how to file complaints alleging discrimination by your agency **directly** with ICJIA,

¹ The EEOP Report Builder can be found at: <https://www.ojp.gov/program/civil-rights-office/data-tools>. The Report Builder Tool will allow agencies to prepare, but not submit, Utilization Reports. Once completed, agencies will need to download and save their forms and reports for review by ICJIA.

OCR, and the EEOC?

Yes No

If yes, please explain these policies and procedures:

As a condition of your subgrant agreement, employees and job applicants must be notified on how to file complaints alleging discrimination with ICJIA, OCR, and the EEOC. If no, what is the target date to create these policies or procedures?

9. Does your agency have written policies or procedures in place for notifying **program beneficiaries** on how to file complaints alleging discrimination by your agency **directly** with ICJIA, the OCR and the EEOC?

Yes No

If yes, please explain these policies and procedures:

As a condition of your subgrant agreement, program beneficiaries must be notified on how to file complaints alleging discrimination with ICJIA, OCR and the EEOC. If no, what is the target date to create these policies and procedures?

10. Please detail the steps that your agency has taken to provide meaningful access to your programs and activities to persons who have Limited English Proficiency (LEP), and whether your agency has a written policy on providing language access services to LEP persons.

11. Does your agency conduct annual trainings for agency grant funded employees on the requirements under federal and state civil rights laws?

Yes No

As a condition of your subgrant agreement, grant funded employees must be trained annually. If no, what is the target date to conduct the training?

12. Does your agency 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

13. Does your agency engage in explicitly religious activities?

Yes No

If no, please move to Question 14. If yes, does your agency do the following?

- a. As a condition of your grant agreement, federal funds must not be used to conduct inherently religious activities, such as prayer, religious instruction, and proselytizing. Does your agency comply with this requirement?

Yes No

- b. As a condition of your grant agreement, your agency must separate explicitly religious activities in either time or location from federally funded activities. Does your agency comply with this requirement?

Yes No

- c. As a condition of your grant agreement, your agency must ensure that participation in explicitly religious activities is voluntary for participants in the federally funded program. Does your agency comply with this requirement?

Yes No

14. Does your agency operate an education program or activity?

Yes No

If no, please move to Question 15. If yes, please answer the following questions.

- a. Does your agency have an administrative grievance procedure established that provides for the prompt and equitable resolution of complaints alleging a violation of Title IX of the Education Amendments of 1972 and applicable regulations, found at 28 C.F.R. Part 54, which prohibit discrimination based on sex?

Yes If yes, please explain these grievance procedures:

No As a condition of your grant agreement your agency must have these policies in place. If no, what is the target date to have these implement these procedures?

- b. Has your agency designated a Title IX coordinator to ensure compliance with the prohibitions against sex discrimination contained in 28 C.F.R. Part 54?

Yes If yes, please provide their name and contact information:

No As a condition of your grant agreement, your agency must designate a Title IX

coordinator. If no, what is the target date to have a person in place?

- c. Does your agency notify applicants for admission and employment, employees, students, parents, and others that your agency does not discriminate on the basis of sex in its educational programs or activities?

Yes If yes, how are they notified:

No As a condition of your grant agreement, your agency must make this notification. If no, what is the target date to provide notification?

15. Does your agency receive Violence Against Women Act (VAWA) or Office on Violence Against Women (OVW) funds?

Yes No

- a. As a condition of your grant agreement, agencies receiving VAWA or OVW funds, must also serve male victims of domestic violence, dating violence, sexual assault, and stalking. Does your agency comply with this requirement?

Yes No

- b. If your agency receives VAWA or OVW funds, does it provide sex-segregated or sex-specific services?

Yes No

If yes, describe how services are sex-segregated or sex-specific, and how your agency determined that it is necessary to the essential operation of the program:

I, _____ certify that the above information is complete and accurate.
Printed name and title of person completing this form

Signature of Person Completing the form

Date