

**Michigan Department of Health and Human Services
Division of Victim Services**

**Methods of Administration for Ensuring Division of Victim Services Subrecipients
Comply with Applicable Federal Civil Rights Laws**

The Michigan Department of Health and Human Services, Division of Victim Services (DVS), 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 DVS subrecipient organizations who receive grant funds from DVS including Victims of Crime Act (VOCA) and Violence Against Women Act (VAWA) grant funds from the U.S. Department of Justice and Family Violence Prevention and Services Act (FVPSA) grant funds from the U.S. Department of Health and Human Services comply with applicable federal civil rights laws.

I. Policy for Addressing Discrimination Complaints

The Division of Victim Services has developed the written *Program Discrimination Complaint Policies and Procedures* and *Employment Discrimination Complaint Policies and Procedures*, comprehensive policies and procedures for receiving complaints from individuals who are receiving funded services at or are employees of a DVS subrecipient receiving funding grant funds from VOCA, VAWA, and FVPSA. DVS maintains an online, public copy of these policies, as well as a copy of the Methods of Administration and a downloadable Federal Civil Rights Complaint form that may be manually completed and forwarded to the Michigan Department of Health and Human Services (MDHHS) Equal Employment Opportunity (EEO) Officer, who serves as the Civil Rights Complaint Coordinator. The EEO Officer for the MDHHS is designated in the policy as the coordinating office for the civil rights compliance process. The EEO Officer 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.

Civil Rights Complaint Coordinator
Michigan Department of Health and Human Services
235 South Grand Avenue, Suite 708
P.O. Box 30037
Lansing, MI 48909
Phone: (269) 337-3744
www.michigan.gov/mdhhs-eeo

Discrimination complaints should be forwarded to the EEO Officer, who shall also refer discrimination complainants in grant-funded services to the OJP's OCR. The EEO Officer 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 EEO Officer will provide individuals with information about Employment Discrimination complaints.

The EEO Officer shall follow the program or employment discrimination complaint policies and procedures to respond to complaints. The EEO Officer shall send the complainant a letter acknowledging receipt of the complaint. The letter to the complainant will also notify the complainant from DOJ (VAWA or VOCA) funded programs that he or she may also file a complaint with the OJP's OCR by submitting a written complaint to:

Office for Civil Rights,
Office of Justice Programs, U.S. Department of Justice
810 7th Street, N.W.
Washington, DC 20531
Phone: (202) 307-0690
TTY: (202) 307-2027
Fax: (202) 354-4380
<https://www.ojp.gov/program/civil-rights/filing-civil-rights-complaint>

DVS will provide subrecipients with a printed copy of the procedure for distribution and display at their facilities.

II. Notification to Subrecipients of Civil Rights Requirements

Applicants for the VOCA, VAWA, FVPSA grant program will be notified of their civil rights non-discrimination obligations and of prohibited discrimination at the time of application. The grant agreement will incorporate all required federal and state award special conditions.

Subrecipients will annually certify in a DVS checklist compliance, which includes federal civil rights obligations, including dissemination of information to project staff.

DVS will announce updates to the *Program Discrimination Complaint Policies and Procedures* and *Employment Discrimination Complaint Policies and Procedures* in its webinars and in writing as they occur.

III. Protocol for Monitoring Subrecipient Compliance with Civil Rights-Related Award Requirements

Prior to awarding an agency VOCA, VAWA or FVPSA funds, a pre-risk assessment will be completed by DVS which will include questions regarding federal civil rights compliance. All grantees will be required to complete the annual certifications checklist, which will include federal civil rights obligations.

All VOCA, VAWA, and FVPSA subrecipients will 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.

Monitoring for the joint VOCA/VAWA programs and VAWA-only programs will include standard reviews, contract reviews, and desk reviews, which will confirm that subrecipients have the applicable policies and procedures in place to ensure compliance with federal civil rights laws and establish a process for employee and beneficiary complaints. These agencies' policies will be reviewed at least once during the grant period.

Monitoring for the VOCA-only programs will rely on the subrecipients' completed annual certification checklist and programmatic risk assessments to determine which agencies should be selected for site visit or desk review. Subrecipients will be informed that any and all documentation should be made available to DVS upon request. These agencies' policies will be reviewed at least once during the grant period.

IV. Methodology for Training Subrecipients on Civil Rights-Related Award Requirements

At minimum, DVS will refer subrecipients to OJP OCR's Civil Rights Trainings and require that the subrecipient's Civil Rights Contact complete the training at least once in the grant period. The purpose of the training is to inform subrecipients on their responsibility for upholding the civil rights laws and for observing non-discrimination obligations. All subrecipients are required to certify in the annual checklist that they have received federal civil rights training.

DVS will provide information in New Grantee Training directing subrecipients to review their federal and state civil rights obligation as well as where to find the DVS Methods of Administration, discrimination and compliant policies and procedures, and the federal civil rights complaint form.