



STATE OF CONNECTICUT
Office of Policy and Management

Criminal Justice Policy and Planning Division
(OPM/CJPPD)

Effective Date: Tuesday, April 30, 2013

Policy for Responding to Discrimination Complaints from Clients, Customers, Program Participants, or Consumers of OPM/CJPPD and OPM/CJPPD's Sub-recipients.

[DRAFT]

[Document: currently being reviewed by Office of Policy and Management, Office of Legal Affairs]

I. Purpose

The purpose of this policy is to establish procedures for employees of the State Administering Agency (SAA), e.g., the Office of Policy and Management, Criminal Justice Policy and Planning Division (OPM/CJPPD), to follow when they receive a complaint alleging discrimination from clients, customers, program participants or consumers of OPM/CJPPD or of a OPM/CJPPD sub-recipient implementing funding from the U.S. Department of Justice (DOJ).

II. Policy

All clients, customers, program participants, or consumers of OPM/CJPPD or of our subrecipients have the right to participate in programs and activities operated by OPM/CJPPD or its sub-recipients regardless of race, color, national origin, sex, religion, and disability. Sub-recipients are required to comply with all applicable federal laws regarding discrimination as a condition of implementing funding from DOJ and certify compliance with the following statutes upon acceptance of the grant award:

- Title VI of the Civil Rights Act of 1964, which prohibits discrimination on the basis of race, color or national origin in the delivery of services (42 U.S.C. § 2000d), and the DOJ implementing regulations at 28 C.F.R. Part 42, Subpart C;
- The Omnibus Crime Control and Safe Streets Act of 1968, which prohibits discrimination on the basis of race, color, national origin, religion, or sex in the delivery of services and employment practices (42 U.S.C. § 3789d(c)(1)), and the DOJ implementing regulations at 28 C.F.R. Part 42, Subpart D;
- Section 504 of the Rehabilitation Act of 1973, which prohibits discrimination on the basis of disability in the delivery of services and employment practices (29 U.S.C. § 794), and the DOJ implementing regulations at 28 C.F.R. Part 42, Subpart G;

- Title II of the Americans with Disabilities Act of 1990, which prohibits discrimination on the basis of disability in the delivery of services and employment practices (42 U.S.C. § 12132), and the DOJ implementing regulations at 28 C.F.R. Part 35;
- Title IX of the Education Amendments of 1972, which prohibit discrimination on the basis of sex in educational programs (20 U.S.C. § 1681), and the DOJ implementing regulations at 28 C.F.R. Part 42, Subpart I.
- The DOJ regulations on the Equal Treatment for Faith-Based Organizations, which prohibit discrimination on the basis of religion in the delivery of services and prohibit organizations from using DOJ funding on inherently religious activities (28 C.F.R. Part 38).

These laws prohibit agencies from retaliating against an individual for taking action or participating in action to secure rights protected by these laws.

III. Complaint Procedures

Discrimination complaints from clients, customers, program participants or consumers of our sub-recipients may be filed using the OPM/CJPPD website and other OPM/CJPPD grants management line portals currently servicing OPM/CJPPD sub-recipients. The standard heading **“Civil Rights Compliance Obligations”** will be used in all cases to assist the complainants in their navigation to the proper place. In addition, a standard form, available for download, will be posted to those online sites that will assist complainants in filing complaints.

Discrimination complaints will be referred to either of the following state or federal agencies:

Connecticut Commission on Human Rights and Opportunities

25 Sigourney Street
Hartford, Connecticut 06106
Phone: 860-541-3400

Website: <http://www.ct.gov/chro/site/default.asp>

Office for Civil Rights, Office of Justice Programs

U.S. Department of Justice
810 7th Street, N.W.
8th Floor
Washington, DC 20531

Website: <http://www.ojp.usdoj.gov>

IV. Notice

Upon receipt of a complaint, the OPM/CJPPD Civil Rights Complaint Coordinator will notify in writing the Department of Justice Office for Civil Rights (OCR) that a complaint has been filed.

A general condition requires that sub-recipients have procedures in place for responding to discrimination complaints that clients, customers, program participants or consumers file directly with the sub-recipient also stating that the sub-recipients are required to forward the complaint to the DOJ OCR or the Connecticut Commission on Human Rights and Opportunities. OPM/CJPPD must also be notified of the referral. Program monitors will include addressing this in their compliance checklist for site visits.

Notice of prohibited discrimination for clients, customers, program participants or consumers of our sub-recipients will be achieved through posting policies and complaint procedures on the OPM/CJPPD website, referencing prohibited discrimination in program materials, and distributing copies of complaint procedures in training sessions and other public events that occur.

IV. Training

OPM/CJPPD staff will be trained on complaint procedures, including their responsibility to refer discrimination complaints from clients, customers, program participants or consumers of sub-recipients to the **OPM/CJPPD Complaint Coordinator**.

Policy and procedures will be posted on the OPM/CJPPD website and other OPM/CJPPD grants management on-line portals currently servicing OPM/CJPPD sub-recipients. In addition, copies will be distributed to all employees.