



KANSAS GOVERNOR'S GRANTS PROGRAM

Checklist for Non-Discrimination and Limited English Proficiency Policies

PRIOR TO SUBMITTING THE FEDERAL CIVIL RIGHTS COMPLIANCE FORM AND REQUIRED DOCUMENTS, USE THE CHECKLIST BELOW AS A GUIDE TO ENSURE ALL DOCUMENTATION MEETS THE REQUIREMENTS

The following must be addressed in a subgrantee's non-discrimination policy:

- Board approval date of non-discrimination policy
- How the subgrantees notifies program **participants** it does not discriminate on the basis of race, color, national origin, religion, sex, disability, and age (if subgrantee is funded by VAWA: sexual orientation and gender identity must be included) in the delivery of services.
- How the subgrantees notifies **employees** it does not discriminate on the basis of race, color, national origin, religion, sex, disability, and age (if subgrantee is funded by VAWA: sexual orientation and gender identity must be included) in the delivery of services.
- How a program participant may file a complaint alleging discrimination
- How an employee may file a complaint alleging discrimination
- The Subgrantee's internal process for handling discrimination complaints from program participants
- The Subgrantee's internal process for handling discrimination complaints from employees
- How subgrantees notify program participants how to file a complaint alleging discrimination by the subgrantee
- How subgrantees notify employees how to file a complaint alleging discrimination by the subgrantee
- The Subgrantee will report to the OCR and the KGGP findings of discrimination against the subgrantee issued by the federal or state court or federal or state administrative agency on the grounds of race, color, religion, national origin, or sex.
- How often subgrantees provide civil rights training to employees
- The name of the subgrantee's civil rights liaison

The following must be addressed and/or stated in subgrantee's non-discrimination policy if the subgrantee operates an education program or activity:

- In compliance with Title IX of the Education Amendments of 1972, found at 28 C.F.R. Part 54, the subgrantee does not discriminate on the basis of sex regarding the operation of an education program or activity.
- Adopted grievance procedures that provide for the prompt and equitable resolution of complaints alleging a violation on the basis of sex.
- A person designated to coordinate compliance with the prohibitions against sex discrimination
- How does the subgrantee notify applicants for admission and employment, employees, students, parents and others that the subgrantee does not discriminate on the basis of sex in its educational programs or activities.

Limited English Proficiency Policy

The following must be addressed and/or stated in subgrantee's Limited English Proficiency (LEP) Policy:

- In compliance with Title VI of the 1964 Civil Rights Act (42 U.S.C. § 2000d), on the ground of race, color or national origin, the subgrantee shall not exclude from participation in, deny the benefits of, or subject to discrimination any person under any program or activity receiving federal financial assistance;
- LEP persons who need language assistance have been identified;
- Ways in which language assistance will be provided;
- How often staff is trained on the LEP policy;
- How notice of services is provided to LEP persons;
- How the LEP policy is monitored;
- Date the LEP policy was adopted;
- How often the LEP policy is updated;
- A list of language assistance services:
 - Oral interpretation services:
 - Bilingual staff:
 - Telephone interpreter lines:
 - Written language services: and
 - Community volunteers.

Recipients of federal financial assistance have an obligation to reduce language barriers that can preclude meaningful access by LEP persons to important government services. If not specifically mentioned in the LEP policy, discuss with the subgrantee the analysis for developing an LEP policy is an individualized assessment that balances the following four factors:		Subgrantee has addressed factors	Analyst has discussed factors with subgrantee
1.	The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or grantee/recipient;	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
2.	The frequency with which LEP individuals come in contact with the program;	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
3.	The nature and importance of the program, activity, or service provided by the program to people's lives; and	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
4.	The resources available to the subgrantee and costs.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A