District Attorneys Council

State Administering Agency Methods of Administration To Ensure Compliance with Federal Civil Rights Laws for Subrecipients of Federal DOJ Funding

Overview

As required under Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, the Age Discrimination Act of 1975, and Title IX of the Education Amendments of 1972, or expanded to address compliance with the nondiscrimination provisions of the Omnibus Crime Control and Safe Streets Act of 1968, the Juvenile Justice and Delinquency Prevention Act of 1974, and the Victims of Crime Act of 1984, and the regulations on the Equal Treatment for Faith-Based Organizations, the following Methods of Administration have been developed to demonstrate that policies have been created and processes and procedures established to notify, monitor, and train subrecipients to ensure that the subrecipients are complying with the federal civil rights laws that are applicable to recipients of federal financial assistance.

I. Policy for Addressing Discrimination Complaints

In 2012, two policies were developed by the Oklahoma District Attorneys Council (DAC) to ensure that employees and clients, customers, or program participants of the State Administering Agency (SAA) and employees and clients, customers, or program participants of subrecipients alleging discrimination were addressed. On September 26, 2012, the Council received notice from the Office of Civil Rights that these policies were approved and the DAC was in substantial compliance with its obligations as an SAA to monitor the civil rights compliance of its subrecipients. The policies may be found in the Appendix A-B. Each document contains the following elements:

(a) Designating a coordinator who is responsible for overseeing the complaint process;

(b) Notifying employees and subrecipients of prohibited discrimination in the SAA's programs and activities and the SAA's policy and procedures for handling discrimination complaints;

(c) Establishing written procedures for receiving discrimination complaints from employees and clients, customers, or program participants of the SAA (as applicable) and from employees and clients, customers, or program participants of subrecipients implementing funding from the DOJ (as applicable);

(d) Investigating each complaint internally, or referring each complaint to the appropriate agency for investigation and resolution, such as the U.S. Equal Employment Opportunity Commission, a local or state human rights commission, or the Office for Civil Rights (OCR), Office of Justice Programs. If the complaint is referred to the OCR for investigation, the OCR will work with the SAA to resolve the complaint;

(e) Notifying the complainant that the complainant may also file a complaint with the OCR by submitting a written complaint to the following address: Office for Civil Rights; Office of Justice Programs; U.S. Department of Justice; 810 Seventh Street N.W.; Washington, DC 20531;

(f) Training SAA staff on their responsibility to refer discrimination complaints, or potential discrimination issues, to the SAA's complaint coordinator for processing as soon as the alleged discrimination comes to their attention;

(g) Notifying employees and clients, customers, and program participants of prohibited discrimination and the procedures for filing a complaint of discrimination, and ensuring that subrecipients do the same; and

(h) Ensuring that subrecipients have procedures in place for responding to discrimination complaints that employees and clients, customers, and program participants file directly with the subrecipient.

II. Notifying Subrecipients of Civil Rights Requirements

As the SAA, the District Attorneys Council (DAC) utilizes a number of mechanisms during the application and award process to notify subrecipients of the applicable civil rights laws and nondiscrimination provisions and the DOJ implementing regulations. Notification occurs at the following contact points:

1. When applying for federal funds, all applications contain a general information section regarding the required compliance with the federal civil rights laws in order to receive federal funding.

2. In submitting an application, the applicant must agree to comply with the Standard/Certified Assurances which pertain to the adherence of civil rights laws.

3. During the awarding of grant funds, the applicant must sign the Award Notice and all supporting documentation which identifies the required civil rights federal laws and requires adherence.

4. DAC has developed policies and reporting forms for addressing discrimination complaints. These can be found on DAC's website: http://www.ok.gov/dac.

5. DAC provides training to subrecipients on the administrative and financial management of federal grants. This training program contains information on the compliance with civil rights laws.

6. DAC provides further information and training to subrecipients on compliance with federal civil rights laws when the subrecipient receives an on-site monitoring visit.

III. Monitoring for Compliance with Civil Rights Requirements

DAC has developed a Monitoring Procedure Manual for both the Federal Grants Division and the Victims Services Division to outline the methods for monitoring subrecipients in the administrative, programmatic, and fiscal management of the federal grant awards.

In serving as good stewards of the federal funds, monitoring is one of the principal responsibilities of DAC. Each grant program is assigned a Grant Program Specialist. It is the responsibility of the Grant Program Specialist to assist the subrecipients in implementing the approved projects within a framework of relevant state and federal statutes, regulations, policies, procedures, and guidelines so as to achieve maximum success.

Through the proactive monitoring of subrecipients, the Grant Program Specialists are able to ensure that fiscal accountability and programmatic integrity are maintained. In addition, monitoring enables the Grant Program Specialists to:

- Ensure that projects initiated by subrecipients are carried out in a manner consistent with the subrecipient's stated goals and objectives;
- Identify and resolve problems that may impede effective implementation of project;
- Collect data to provide comprehensive fiscal information to the VOCA Accountant;
- Provide any needed consultation and technical assistance to the subrecipient.

Two forms of monitoring that are used by DAC are on-site monitoring and desk reviews. Throughout the course of the award period, the Grant Program Specialists are responsible for arranging on-site visits with the subrecipients and requesting information for desk reviews.

As a part of the on-site monitoring process, the Grant Program Specialists utilize either an on-line, web-based monitoring form or a paper monitoring form. Through the on-site visit and the monitoring form, the Grant Program Specialist is able share and obtain information on the subrecipient's compliance with the applicable civil rights laws and nondiscrimination provisions and the DOJ implementing regulations.

In order to prioritize monitoring, DAC has set criteria to direct the on-site monitoring and desk reviews of the grant programs. DAC uses a risk assessment process to create a proactive system of ensuring programmatic and fiscal success of all subrecipients during the monitoring process. It is an acknowledgement that some subrecipients may need additional assistance to implement an effective project. The assignment of risk can change throughout the grant period, depending on changing circumstances. The risk assessment should not be viewed as a pejorative or punitive system, but as a tool to create a high functioning program.

Rating System

At the beginning of each grant cycle, the Grant Programs Specialist will conduct a risk assessment of each subrecipient based on certain criteria. The purpose of conducting a risk assessment is to create a proactive system to ensure the programmatic and fiscal success of all subrecipients during the monitoring process.

The system is the assignment of a numeric value to each funded project based on certain criteria, listed below.

1 = Highest Risk
2 = Moderate Risk
3 = Lowest Risk

Criteria
A program receives a risk value based on circumstances of the grant, past performance, individual situations, information gathered during the application or monitoring process, and other criteria deemed relevant by the Grant Programs Specialist. A value is assigned based on the number of criteria that apply.

Highest Risk is 6 or more criteria
Moderate Risk is 4-5 criteria
Lowest Risk is 3 or less criteria

A subrecipient that has no history in successfully implementing a grant will be automatically rated as a high risk.

The remaining criteria are as follows:

Administrative Criteria:
1. New Subrecipient.
2. There is a change in the Authorized Official in the previous or current grant award.
3. There is a change in the Project Director in the previous or current grant award.
4. There is a change in the Fiscal Officer in the previous or current grant award.
5. The subrecipient has been placed on Draw Hold on two or more occasions for a fiscal or programmatic issue in the previous or current grant.
6. The subrecipient has had significant corrective action(s) in the previous or current grant.
7. The subrecipient didn't receive an on-site monitoring visit or a desk review in the previous year(s).
8. The subrecipient submits inaccurate or incomplete Award Documents.

Financial Criteria:
1. The subrecipient submitted two or more late or incorrect Requests for Funds in the previous or current grant period.
2. The subrecipient submitted two or more late or incorrect Quarterly Reports in the previous or current grant period.
3. The subrecipient submitted an incorrect revised budget.

Programmatic Criteria:
1. The subrecipient submitted late or incorrect Programmatic Reports in the previous or current grant period.
2. The subrecipient submitted incorrect or incomplete goals and objectives.
3. The awarded project experienced a delayed start.

4. The subrecipient not making sufficient progress toward approved goals and objectives on the previous or current grant project.

Action
Based on the assigned value, the following course of action may be taken:

- For a high risk subrecipient, the Grant Programs Specialist will conduct a minimum of one site visit and additional desk review, if necessary.

- For a moderate risk subrecipient, the Grant Programs Specialist may conduct a minimum of one site visit or desk review.

- For a low risk subrecipient, they may not be monitored at all for that grant period. However, the Grant Programs Specialist will conduct a site visit if "no site visit in previous year" or "new subrecipient" is among the risk factors selected for a subrecipient. For all others in this category, the Grant Programs Specialist may conduct a site visit or a desk review if they deem it necessary.

At a minimum, 25% of subgrantees either receive a desk review or an on-site visit each year.

IV. Training Subrecipients on Civil Rights Requirements

DAC utilizes web-based conferences and in-person training to provide administrative and financial training for subrecipients. All new grant awardees or grantees with new a Project Director and/or Finance Officer must attend the training. Information is provided to subrecipients on their obligations to comply with the applicable civil rights laws and nondiscrimination provisions and the DOJ implementing regulations.

APPENDIX A

Procedures for Responding to Discrimination Complaints from Employees of the Oklahoma District Attorneys Council's Sub-Recipients under U.S. Department of Justice Grant Programs

Procedures for Responding to Discrimination Complaints from Employees of the Oklahoma District Attorneys Council's Sub-Recipients under U.S. Department of Justice Grant Programs

Effective Date: August 28, 2012

I. PURPOSE

The Oklahoma District Attorneys Council ("DAC") receives federal financial assistance and serves as the State Administering Agency ("SAA") for many federal grant programs. The purpose of this policy is to establish written procedures for DAC employees to follow when they receive a complaint alleging employment discrimination from an employee or consumer of a DAC sub-recipient implementing U.S. Department of Justice ("DOJ") federal grant funding.

II. POLICY

All employees and consumers of DAC's sub-recipients shall be treated equally regardless of race, color, national origin, sex, religion, and disability. Sub-recipients are required to comply with all applicable federal laws regarding employment discrimination, including laws that prohibit retaliation, as a condition of receiving and implementing federal funding.

Sub-recipients must have procedures in place to respond to discrimination complaints that employees or applicants file directly with the sub-recipient, which may include investigating the complaint internally or forwarding the complaint to the office of the General Counsel for the DAC or the U.S. Equal Employment Opportunity Commission. Sub-recipients must notify the DAC grant program specialist of the receipt of any such complaints. Grant program specialists will inquire about complaint procedures in their compliance checklist for site visits.

III. DEFINITIONS

For the purposes of this policy, the terms included in this section are defined as follows, unless otherwise indicated in the policy.

A. Complainant. "Complainant" means a person who initiates a complaint alleging discrimination or retaliation.

B. "Retaliation" refers to adverse actions towards an individual engaged in a protected activity, such as opposing a discriminatory practice or participating in a discrimination complaint process.

C. Sub-recipient. "Sub-recipient" means an agency that receives federal grant funding through the DAC as the State of Oklahoma SAA.

IV. COMPLAINTS PROCEDURE

A. Filing a Complaint

Any employee or consumers of a DAC sub-recipient may report allegations of employment discrimination with the office of the General Counsel for the DAC.

B. When to Report

A person who thinks he or she has been subject to employment discrimination should file a complaint alleging such *as soon as possible* after the first date an alleged act of discrimination has occurred and no later than one hundred eighty (180) calendar days after the last date an alleged act of discrimination has occurred. A person complaining of discrimination under the Omnibus Crime Control and Safe Streets Act must file a complaint within one year from the last act of alleged discrimination or retaliation.

C. How to Report

Complaints alleging employment discrimination by a sub-recipient must be submitted to the office of the General Counsel in writing, using the *DAC Employment Discrimination Complaint* form, which is attached as Appendix A; exceptions to this requirement, however, may be made on a case-by-case basis by the General Counsel. Contact information for the current General Counsel is listed in Appendix B of this policy. In making a complaint, a complainant must disclose the identity of the person or persons alleged to have engaged in discriminatory or retaliatory conduct, and the location, date and a description of each act of alleged discrimination or retaliation.

D. Response

1. An employee or contractor of the DAC other than the General Counsel who receives a complaint (in person, over the telephone, or via an e-mail, a letter, or the *DAC Employment Discrimination Complaint* form) that an employee or contractor of a sub-recipient has allegedly engaged in discriminatory or retaliatory conduct shall, *as soon as practicable*, notify the DAC General Counsel, who shall ascertain the details of the complaint for evaluation and assignment. The DAC General Counsel will ensure that the complainant completes a *DAC Employment Discrimination Complaint* form, if he/she has not already done so.
2. Upon receipt of a complaint, the General Counsel shall determine whether the complaint should be investigated, and, if so, by whom. The DAC General Counsel may investigate the complaint internally, utilize the services of a Certified Discrimination Complaints Investigator through the Oklahoma Office of Personnel Management, Equal Opportunity and Workforce Diversity Division, or may refer the complaint to the U.S. Equal Employment Opportunity Commission or the appropriate state or human rights commission for investigation, or other entity.
3. The DAC General Counsel shall promptly provide the complainant with a written notice acknowledging receipt of the complaint, and explaining whether General Counsel has referred the complaint to another agency for investigation. If the complaint is against a sub-recipient implementing funding from the U.S. Department of Justice, the DAC General Counsel shall inform the complainant

that he/she may also file a complaint with the United States Department of Justice, Office of Justice Programs, Office for Civil Rights, 810 Seventh Street NW, Washington, DC 20531, Phone: 202-307-0690, www.ojp.usdoj.gov/about/offices/ocr.htm. Individuals may also submit a complaint to the Oklahoma Office of the Attorney General, Office of Civil Rights Enforcement (OCRE) at 313 N.E. 21st Street, Oklahoma City, OK 73105, Phone: 405-521-2029, www.oag.state.ok.us/oagweb.nsf/ocre. Complaints related to employment discrimination must be filed with the OCRE within 180 days from the last alleged discriminatory act.

4. The General Counsel shall inform a complainant that it may be impossible to keep the complainant's identity confidential.
5. Investigations of complaints are to be completed within a reasonable time.
6. In the event a written report of an investigation is warranted, all information relevant to the complaint that is obtained by an investigator shall be included in the report.
7. All investigations shall comply with relevant state and federal laws.

V. TRAINING

The DAC shall provide periodic training on the procedures set forth in this policy to DAC employees. This training shall include instruction about the responsibility of employees to refer discrimination complaint to the DAC General Counsel. The DAC shall require sub-recipient to conduct and document periodic training on the procedures set forth in this policy to sub-recipient employees.

VI. POLICY DISSEMINATION

A copy of this policy shall be made available to all DAC and sub-recipient employees and contractors. A copy of the policy also will be included with orientation materials that are provided to new employees of the DAC, and will be posted on the DAC's main website.

Information on the policy will be provided during sub-recipient financial and programmatic training and in conjunction with fiscal and programmatic site visits. By signing the grant award contract, the sub-recipient agrees to comply with all applicable federal civil rights laws prohibiting discrimination in employment.

Oklahoma District Attorneys Council
Discrimination Complaint Information Form

1. Complaint Information:

Name	
Address	
City	
State	
Zip	
Home Phone Number	
Work Phone Number	

2. Respondent Information:

Provide Name and address of agency involved:

Name	
Address	
City	
State	
Zip	
Telephone Number	

3. What is the most convenient time and place to contact you about this complaint?

_____

4. To your best recollection on what date(s) did the discrimination take place?

Date of first occurrence:_____

Date of most recent occurrence: _____

5. Have you ever attempted to resolve this complaint? ☐ Yes ☐ No

6. Explain as briefly and clearly as possible what happened and how you were discriminated against. Provide as many specific details as possible. Also attach any written material pertaining to your case. (Attach additional sheets if needed.)

_____

_____

_____

_____

_____

7. Basis of Complaint: Which of the following best describes why you believe you were discriminated against: (Check)

- ☐ Race: Specify _____
- ☐ Color: Specify _____
- ☐ Religion: Specify_____
- ☐ National Origin: Specify _____
- ☐ Sex: Specify ☐ Male ☐ Female
- ☐ Age: Specify Date of Birth:_____
- ☐ Disability: Specify _____
- ☐ Political Affiliation: Specify _____
- ☐ Citizenship: Specify_____
- ☐ Reprisal/Retaliation: Specify _____
- ☐ Other: Specify _____

8. What other information do you think is relevant to this situation?

_____

_____

_____

_____

_____

9. If this complaint is resolved to your satisfaction, what remedies do you seek?

_____

_____

_____

_____

_____

10. Please list below any persons (witnesses, fellow employees, supervisors, or others) that may be contacted for additional information to support or clarify your complaint:

_____	_____	_____
Name	Address	Telephone Number

11. Do you have an attorney? ☐ Yes ☐ No

If yes, please provide name, address and phone:

_____	_____	_____
Attorney Name	Address	Telephone Number

12. Have you filed a case or complaint with any of the following?

☐ Civil Rights Division, U.S. Dept. of Justice

☐ U.S. Equal Employment Opportunity Commission

☐ Federal or State Court

☐ Oklahoma Human / Rights Commission

13. For each item checked in #12 above, please provide the following information:

Agency:
Data Filed:
Case or Docket Number:
Date of Trial or Hearing:
Location of agency or court:
Name of Investigator:
Status of Case:
Comments:

14. Sign (Complaint NOT VALID unless Signed)

_____ _____

Name Date

APPENDIX B

Procedures for Responding to Discrimination Complaints Clients, Customers, Program Participants, or Consumers of the Oklahoma District Attorneys Council (DAC) and the DAC's Sub-Recipients

Procedures for Responding to Discrimination Complaints Clients, Customers, Program Participants, or Consumers of the Oklahoma District Attorneys Council (DAC) and the DAC's Sub-recipients

Effective Date: Effective August 28, 2012

VII. PURPOSE

The Oklahoma District Attorneys Council ("DAC") serves as the State Administering Agency ("SAA") for many federal grant programs. As such, the DAC must ensure that the civil rights of persons, who receive services from the DAC, as well as from any recipient of federal grant funding received through the DAC ("sub-recipient"), are protected.

The purpose of this policy is to establish written procedures for DAC employees to follow when they receive a complaint alleging discrimination or retaliation in the delivery of services from clients, customers, program participants, or consumers of the DAC or of a DAC sub-recipient implementing grant funding from the U.S. Department of Justice ("DOJ").

VIII. POLICY

In using and administering federal grant funds, neither the DAC nor any sub-recipient may discriminate against any person on the basis of the person's race, color, national origin, sex, religion, disability or age, or retaliate against any person for having engaged in protected activity.

By virtue of receiving federal grant funding, the DAC, including its employees, contractors and sub-recipients must comply with the following federal civil rights laws and regulations:

- 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 54;

- The Age Discrimination Act of 1975, which prohibits discrimination on the basis of age in the delivery of services (42 U.S.C. § 6102), and the DOJ implementing regulations at 28 C.F.R. Part 42, Subpart I; and

- 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).

IX. DEFINITIONS

For the purposes of this policy, the terms included in this section are defined as follows, unless otherwise indicated in the policy.

A. Complainant. "Complainant" means a person who initiates a complaint alleging discrimination or retaliation.

B. "Retaliation" refers to adverse actions towards an individual engaged in a protected activity, such as opposing a discriminatory practice or participating in a discrimination complaint process.

C. Sub-recipient. "Sub-recipient" means an agency that receives federal grant funding through the DAC as the State of Oklahoma SSA.

X. COMPLAINT PROCEDURES

E. Filing a Complaint

A person who thinks he or she has been discriminated against by an employee or contractor of the department or a sub-recipient on the basis of race, color, national origin, sex, age, religion, or physical or mental disability, or thinks he or she has been retaliated against for having engaged in protect activity, is encouraged to file a complaint alleging such with the office of the General Counsel of the DAC.

F. When to Report

A person who thinks he or she has been subject to discriminatory or retaliatory conduct should file a complaint alleging such as soon as possible after the first date an alleged act of discrimination or retaliation occurred, and no later than one hundred eighty (180) calendar days after the last date an alleged act of discrimination or retaliation has occurred. A person complaining of discrimination under the Omnibus

Crime Control and Safe Streets Act must file a complaint within one year from the last act of alleged discrimination or retaliation.

G. How to Report

Complaints alleging discrimination or retaliation must be submitted to the office of the General Counsel in writing, using the *DAC Discrimination Complaint* form, which is attached as Appendix A; exceptions to this requirement, however, may be made on a case-by-case basis by the General Counsel. Contact information for the current General Counsel is listed in Appendix B of this policy. In making a complaint, a complainant must disclose the identity of the person or persons alleged to have engaged in discriminatory or retaliatory conduct, and the location, date and description of each act of alleged discrimination or retaliation.

H. Response

1. An employee or contractor of the DAC other than the General Counsel who receives a complaint (in person, over the telephone, or via an e-mail, a letter, or the *DAC Employment Discrimination Complaint Form*) that an employee, contractor or a sub-recipient of the DAC has allegedly engaged in discriminatory or retaliatory conduct shall, as soon as practicable, notify the General Counsel, who shall ascertain the details of the complaint for evaluation and assignment.
2. Upon receipt of a complaint, the General Counsel shall determine whether the complaint should be investigated, and, if so, by whom.
3. The General Counsel shall promptly provide the complainant with a written notice acknowledging receipt of the complaint.
4. The General Counsel shall inform a complainant that it may be impossible to keep the complainant's identity confidential.
5. Investigations of complaints are to be completed within a reasonable time.
6. In the event a written report of an investigation is warranted, all information relevant to the complaint that is obtained by an investigator shall be included in the report.
7. All investigations shall comply with relevant state and federal laws.

XI. EXTERNAL AGENCIES

The DAC encourages individuals to file complaints of the kind discussed in this policy with the office of the General Counsel; however, this policy is not intended to impair or limit the rights of anyone to seek a remedy availably under state or federal law. The procedures discussed in this policy need not be utilized first or in any sequence, nor does such procedure need to be exhausted before another is issued.

If a complaint is against the DAC or a sub-recipient implementing funding from the DOJ and alleges discrimination on the basis of race, color, national origin, sex, religion, physical or mental disability, or age, or alleges retaliation against a person for having engaged in protected activity, an individual may also submit a complaint to the United States Department of Justice, Office of Justice Programs, Office for Civil Rights, 810

Seventh Street NW, Washington, DC 20531, Phone.: 202-307-0690, www.ojp.usdoj.gov/about/offices/ocr.htm. Complaints must be filed within 180 days or one year from the date of the alleged discrimination, depending on the federal civil rights law that is involved.

Individuals may also submit a complaint to the Oklahoma Office of the Attorney General, Office of Civil Rights Enforcement (OCRE), 313 N.E. 21st Street, Oklahoma City, OK 73105, Phone: 405-521-3441, www.oag.state.oks.us/oagweb.nsf/ocre. Complaints related to public accommodation discrimination must be filed with OCRE within 180 days from the last alleged discriminatory act. Complaints related to housing discrimination must be filed within one (1) year from the last alleged discriminatory act.

XII. TRAINING

The DAC shall provide periodic training on the procedures set forth in this policy to DAC and sub-recipient employees. This training shall include instruction about the responsibility of employees to refer discrimination complaints to the office of the General Counsel at the DAC.

XIII. CONTRACTS

The DAC will not enter into contracts nor continue existing contracts with any organization that knowingly discriminates against any person on the basis of race, color, national origin, sex, religion, physical or mental disability, or age, or that retaliates against any person for having engaged in protected activity.

XIV. DISTRIBUTION

A copy of this policy shall be made available to all DAC and sub-recipient employees and contractors. A copy of the policy also will be included with orientation materials that are provided to new employees of the DAC, and will be posted on the DAC's main website.

Oklahoma District Attorneys Council
Discrimination Complaint Information Form

1. Complaint Information:

Name	
Address	
City	
State	
Zip	
Home Phone Number	
Work Phone Number	

2. Respondent Information:

Provide Name and address of agency involved:

Name	
Address	
City	
State	
Zip	
Telephone Number	

3. What is the most convenient time and place to contact you about this complaint?

_____

4. To your best recollection on what date(s) did the discrimination take place?

Date of first occurrence:_____

Date of most recent occurrence: _____

5. Have you ever attempted to resolve this complaint? ☐ Yes ☐ No

6. Explain as briefly and clearly as possible what happened and how you were discriminated against. Provide as many specific details as possible. Also attach any written material pertaining to your case. (Attach additional sheets if needed.)

_____

_____

_____

_____

_____

7. Basis of Complaint: Which of the following best describes why you believe you were discriminated against: (Check)

- ☐ Race: Specify _____
- ☐ Color: Specify _____
- ☐ Religion: Specify_____
- ☐ National Origin: Specify _____
- ☐ Sex: Specify ☐ Male ☐ Female
- ☐ Age: Specify Date of Birth:_____
- ☐ Disability: Specify _____
- ☐ Political Affiliation: Specify _____
- ☐ Citizenship: Specify_____
- ☐ Reprisal/Retaliation: Specify _____
- ☐ Other: Specify _____

8. What other information do you think is relevant to this situation?

_____

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9. If this complaint is resolved to your satisfaction, what remedies do you seek?

_____

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_____

_____

10. Please list below any persons (witnesses, fellow employees, supervisors, or others) that may be contacted for additional information to support or clarify your complaint:

_____	_____	_____
Name	Address	Telephone Number

11. Do you have an attorney? ☐ Yes ☐ No

If yes, please provide name, address and phone:

_____	_____	_____
Attorney Name	Address	Telephone Number

12. Have you filed a case or complaint with any of the following?

☐ Civil Rights Division, U.S. Dept. of Justice

☐ U.S. Equal Employment Opportunity Commission

☐ Federal or State Court

☐ Oklahoma Human / Rights Commission

13. For each item checked in #12 above, please provide the following information:

Agency:
Data Filed:
Case or Docket Number:
Date of Trial or Hearing:
Location of agency or court:
Name of Investigator:
Status of Case:
Comments:

14. Sign (Complaint NOT VALID unless Signed)

_____ _____

Name Date

Oklahoma District Attorneys Council
General Counsel Contact Information

Lee McIntire Cohlmia currently serves as General Counsel for the District Attorneys Counsel.

- **Mailing Address:**
  Lee McIntire Cohlmia
  District Attorneys Council
  421 NW 13th St., Suite 290
  Oklahoma City, OK 73103

- **Office Telephone Number**: 405-264-5000
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