

Frequently Asked Questions regarding EEOP:

1. Are subgrantees required to report findings/allegations of discrimination related to their subgrant only OR any findings/allegations for the entire agency?
Subgrantees should report only findings of discrimination (*not* allegations) on the basis of race, color, national origin, sex or religion that are made by a Federal or State court or Federal or State administrative agency after a due process hearing. This applies to any findings of discrimination against the agency, whether or not the underlying facts involve the OJP grant. Remember that the civil rights obligations that attach to recipients of Federal financial assistance cover any “program or activity” of the recipient agency, not just the specific activities paid for by the OJP grant.
2. Are "subcontractors" of JAG subgrantees required to prepare/submit EEOP? What exactly are the requirements for these types of entities?
The EEOP requirements do not apply to subcontractors. Generally, subcontractors are not considered recipients of Federal financial assistance, and not subject to any of the civil rights requirements that attach to receiving Federal funds. See 28 C.F.R. 42.103(a).
3. Per EEOP, what is the definition of a medical institution? Are county medical entities considered exempt?
The EEOP regulations do not define “medical institution.” Any medical institution is exempt.
4. DCJ is awarding a JAG subgrant to the City of XYZ Police Dept, should their EEOP be for the entire city or for just the Police Dept??
If the grant is awarded to the Police Department directly (as opposed to being awarded to the city, which sub-awarded some money to the PD), then only the PD is subject to the EEOP requirements. The police department should choose the “law enforcement agencies” option at <http://www.ojp.usdoj.gov/about/ocr/eeop.htm>.
5. Is there someplace specific in OJP/OCR guidance that mandates that EEOP must be current? 28 C.F.R. 42.305 is the authority for requiring EEOP certification prior to the authorization to fund new or continuing programs. Additionally, the 2 year requirement is stated in Section B of the EEOP certification form found at <http://www.ojp.usdoj.gov/about/ocr/pdfs/cert.pdf>.

General questions regarding EEOP can be directed to Stacey Alles @ DCJ, 303-239-5773.

Specific questions should be directed to the Department of Justice, Office for Civil Rights @ 202-307-0690 or askOCR@ojp.usdoj.gov.