



Arizona Criminal Justice Commission

October 11, 2012

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VACANT
Police Chief

Mr. Michael Alton, Director
Office for Civil Rights, Office of Justice Programs
US Department of Justice
810 Seventh St., NW
Washington, D.C. 20531

Dear Mr. Alton:

The Arizona Criminal Justice Commission (ACJC), as a State Administering Agency (SAA) for Arizona, submits the following as the agency's Methods of Administration in compliance with the Office of Justice Programs, Office of Civil Rights (OCR) special conditions.

Methods of Administration:

I. Policy for Addressing Discrimination Complaints

Section 305-Subgrantee Discrimination Complaint Procedures (effective 11/1/2011) has been included in the ACJC Policy and Procedure Manual and posted on the ACJC web site. The policy:

- Designates the Human Resources Manager as the coordinator responsible for overseeing the complaint process.
- States that the procedures will be posted on the ACJC web site to notify employees and subrecipients of prohibited discrimination in ACJC's programs and activities as well as policies and procedures to handle discrimination complaints.
- Establishes written procedures for receiving discrimination complaints.
- Establishes a process for investigating complaints internally or for referring them to the appropriate agency for investigation.
- Notifies the complainant that the complainant may also file a written complaint with the OCR.
- Establishes a requirement for ACJC employees to be trained on their responsibility to refer discrimination complaints or potential OCR issues to the coordinator.
- Establishes a way to notify employees and clients, customer and program participants of prohibited discrimination and the procedures to file a complaint of discrimination and ensuring that subrecipients do the same.
- Ensures that subrecipients have procedures in place for responding to discrimination complaints.

ACJC has on file the written procedure under Section 305-Subgrantee Discrimination Complaint Procedures in the ACJC Policy and Procedure Manual. The Office of Civil Rights has reviewed and approved the written procedure.

Executive Director

John A. Blackburn, Jr.

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In regard to complaints submitted by ACJC employees alleging discrimination by the ACJC itself, the ACJC has in place the policy entitled "Grievance Process" (Section 107, effective 2/4/11) which sets forth procedures that employees should follow when raising a claim of discrimination. The ACJC does not have any direct clients or program participants.

II. Notifying Subrecipients of Civil Rights Requirements

Each grant solicitation contains language notifying applicants of civil rights laws and non-discrimination requirements that are binding on DOJ funded subrecipients. In addition, every grant agreement awarding funds to subrecipients contains the civil rights requirements and non-discrimination language. The grant solicitation and grant agreement documents have been reviewed and approved by the Office of Civil Rights.

III. Monitoring for Compliance with Civil Rights Requirements

As part of the programmatic monitoring of subrecipients, ACJC has incorporated the OCR Federal Civil Rights Compliance Checklist into the ACJC Site Visit Report tool that is used to review compliance with other federal and state requirements. Site visits are conducted at least once during each grant period for each subrecipient. The ACJC Site Visit Report tool has been reviewed and approved by the Office of Civil Rights.

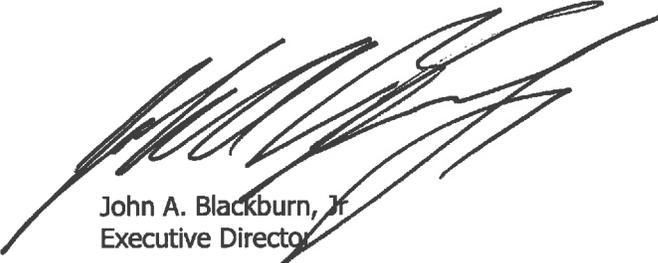
IV. Training Subrecipients on Civil Rights Requirements

ACJC acknowledges the obligation to provide training to subrecipients on applicable civil rights laws and non-discrimination provisions as well as DOJ implementing regulations. ACJC has opted to utilize the training offered by the Office of Civil Rights and will post a link on the ACJC web site to the online Civil Rights training programs offered by OCR. In addition, ACJC will ensure that each subrecipient will complete civil rights and non-discrimination compliance training at least once per grant award.

The Arizona Criminal Justice Commission would like to thank Shelly Langguth for guidance as we formalize our policies and procedures to comply with the Office of Civil Rights requirements.

Please let me know if you have any questions or require additional clarification.

Sincerely,



John A. Blackburn, Jr.
Executive Director