

Exhibit 1: Steps for Post-Award Civil Rights Compliance Reviews and Questions Asked

1. The Regional Diversity and Civil Rights (DCR) office:

- a. Identifies the recipient for which it will conduct a civil rights compliance review and notifies the Civil Rights Coordinator for Public Access in the Wildlife and Sport Fish Restoration (WSFR) office for coordination purposes.
- b. Coordinates with the recipient to set up mutually agreeable dates for the review.
- c. Asks the recipient to identify a point of contact for the review.
- d. For an onsite review, coordinates with the Regional Director to send a letter to the recipient asking for records that the Regional Office review team can review before the onsite review. For a desk audit, the letter asks the recipient to send in records. Regional Offices usually give recipients at least 60 days to provide the information.

2. When the recipient provides the records, the Regional DCR Office examines them and prepares a summary/analysis. The Regional DCR offices may seek the technical guidance of the Civil Rights Coordinator for Public Access.

3. The Regional DCR office coordinates with the recipient about the schedule for the review by preparing an agenda for the onsite visit. The agenda usually includes:

- An opening conference with the Agency Director;
- Interviews with staff and officials responsible for designated program areas;
- At least one site visit;
- Informal contacts with community groups to determine the level of services received; and
- A closeout conference with the Agency Director.

Regional DCR officials lead these onsite reviews. The Civil Rights Coordinator for Public Access may participate as an observer and provide input and guidance as needed during the report preparation.

4. The onsite review typically takes 2 to 3 days.

5. The Regional DCR office prepares a Report of Findings which is reviewed and approved through the Regional Director.

6. When reviewers identify deficiencies in the Report of Findings, the Regional Office asks the recipient for a response and any documentation showing that it has addressed deficiencies or implemented recommendations.

If the post-award review is a desk review rather than onsite, Regional Offices skip Steps 1b and 1c, 3, and 4.

Sample Questions:

Regional review teams ask questions during document reviews and recipient interviews. The typical broad areas addressed are:

1. Where is the civil rights program located on your organizational chart?

2. Do you have a designated civil rights coordinator? Who is your Section 504 and Title IX grievance officer?
3. Can you explain how people with disabilities can access programs you conduct if there are access barriers identified?
4. Do you have a current self-evaluation process to examine, on a regular basis, barrier removal needs and modifications for people with disabilities? Do you have a transition plan which gives time frames for barrier removal?
5. Do you seek input from people with disabilities or disability groups as part of the self-evaluation? How?
6. Do construction contracts hold the vendors responsible for complying with accessibility standards?
7. How do you notify people with disabilities about the accessible facilities where the programs are conducted?
8. How do you notify the public about Federal civil rights requirements? Do your publications have a civil rights notification required by law?
9. Do you collect racial/ethnic data on program beneficiaries to determine whether racial/ethnic minorities are well represented in programs?
10. Do you conduct outreach to minority communities, pursue active liaisons with minority groups, and locate programs and activities in minority communities as well as non-minority communities?
11. Do your advisory boards reflect the racial/ethnic makeup of the population of your State?
12. Does the racial/ethnic and gender makeup of education instructors generally reflect the demographics of your State?
13. Do you collect gender data on educational program beneficiaries to ensure that men and women are equitably included in educational programs? If significant under-representations are evident, do you conduct outreach to affected groups?
14. Are your contracting policies thorough so that subcontractors and subrecipients are aware of their civil rights responsibilities and have signed the Assurance (SF-424B)?
15. Do your construction contracts include an agreement that the vendor will perform the work in compliance with accessibility standards, so that all new construction, major renovations and alterations are 100% accessible?
16. Are your license fees or other fees reasonable so that they do not eliminate low-income beneficiaries?
17. Can you describe your complaint procedures for members of the public?
18. How do your employees, especially those who interact with the public, respond to a person who wants to file a complaint?
19. How do your employees, especially those who interact with the public, respond to a person who does not speak English or has limited English proficiency?

20. Have you identified your waste disposal policies to determine whether any emissions of toxic waste into the air, ground, or water have an adverse impact on minority or low-income communities?
21. Does your environmental assessment or impact statement preparation process include a provision to seek the input of minority and low-income communities impacted by these decisions?
22. Can you describe how you train your managers and staff on public access civil rights requirements?
23. Do your public notices contain an invitation to the public to identify special accessibility needs, and provide contact information including name, telephone number, and either a TTY number or the State relay number?
24. Are your publications and Web sites available in alternative formats upon request?