

PROCEDURES FOR RESPONDING TO EMPLOYMENT AND SERVICES DISCRIMINATION COMPLAINTS FOR IDAHO STATE POLICE PASS-THROUGH GRANTS AND RESEARCH SUBGRANTEES (Updated October 2026)

I. PURPOSE

The purpose of this procedure is to provide written guidelines for Idaho State Police (ISP) Pass-Through Grants and Research (PGR) employees when they receive a complaint alleging employment or services discrimination from employees, applicants, clients, customers, program participants or consumers of a PGR subgrantee implementing funding from the U.S. Department of Justice (DOJ).

ISP is designated as the State Administering Agency (SAA) for specific federal grants awarded by DOJ. These grants include the Edward Byrne Memorial Justice Assistance Grant, the STOP Violence Against Women Grant, the Sexual Assault Services Formula Program, the Residential Substance Abuse Treatment for State Prisoners Grant, and the Byrne State Crisis Intervention Program. These grants are managed by PGR and passed through to state, local, and tribal governments, as well as faith-based and non-profit organizations (referred to in these procedures as external PGR subgrantees). Several ISP departments also receive DOJ pass-through funds (referred to in these procedures as internal ISP subgrantees).

II. POLICY

All individuals have the right to participate in programs and activities operated by PGR and PGR subgrantees, regardless of race, color, national origin, sex, including on the bases of actual or perceived sexual orientation and gender identity, religion, disability or age. All complaints of discrimination, regardless of where reported or from whom, are taken seriously. PGR will ensure that they and their subgrantees are in compliance with the following statutes and regulations.

CIVIL RIGHTS LAWS

- Section 601 of Title VI of the Civil Rights Act of 1964, [42 U.S.C. § 2000d](#) (Title VI).
 - Statutory provision:
No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.
 - DOJ implementing regulation: [Subpart C](#) and [Subpart F](#) of 28 C.F.R. Part 42.
- Section 504 of the Rehabilitation Act of 1973, [29 U.S.C. § 794\(a\)](#). (Section 504).
 - Statutory provision:
No otherwise qualified individual with a disability in the United States, as defined in [29 U.S.C. § 705(20)], shall, solely by reason of her or his disability, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance[.]
 - DOJ implementing regulation: [Subpart G of 28 C.F.R. Part 42](#).
- Section 901 of Title IX of the Education Amendments of 1972, [20 U.S.C. § 1681\(a\)](#) (Title IX).
 - Statutory provision:
No person in the United States shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving Federal financial assistance[.]
 - DOJ implementing regulations: [28 C.F.R Part 54](#).

- Section 303 of the Age Discrimination Act of 1975, [42 U.S.C. § 6102](#) (Age Act).
 - Statutory provision:
[N]o person in the United States shall, on the basis of age, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under, any program or activity receiving Federal financial assistance.
 - DOJ implementing regulation: [Subpart I of 28 C.F.R. Part 42](#).
- Title II of the Americans with Disabilities Act of 1990, [42 U.S.C. § 12132](#) (Title II).
 - Statutory provision:
Subject to the provisions of this subchapter, no qualified individual with a disability shall, by reason of such disability, be excluded from participation in or denied the benefits of the services, programs, or activities of a public entity, or be subjected to discrimination by any such entity.
 - DOJ implementing regulation: [28 C.F.R Part 35](#).

NONDISCRIMINATION PROVISIONS

- Section 809(c) of Title I of the Omnibus Crime Control and Safe Streets Act of 1968, [34 U.S.C. § 10228\(c\)](#) (Safe Streets Act). See also [34 U.S.C. § 11182\(b\)](#).
 - Statutory provision:
No person in any State shall on the ground of race, color, religion, national origin, or sex be excluded from participation in, be denied the benefits of, or be subjected to discrimination under or denied employment in connection with any programs or activity funded in whole or in part with funds made available under this chapter.
 - DOJ implementing regulation: Subpart D of 28 C.F.R. Part 42.
- Grant condition required by Section 40002(b)(13) of the Violence Against Women Act of 1994, [34 U.S.C. § 12291\(b\)\(13\)\(A\)](#) (VAWA).
 - Statutory Provision:
No person in the United States shall, on the basis of actual or perceived race, color, religion, national origin, sex, gender identity (as defined in [paragraph 249\(c\)\(4\) of title 18](#)), sexual orientation, or disability, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity funded in whole or in part with funds made available under the Violence Against Women Act of 1994...and any other program or activity funded in whole or in part with funds appropriated for grants, cooperative agreements, and other assistance administered by the Office on Violence Against Women.
 - Any award administered by OVW is subject to a grant condition that prohibits discrimination both in employment and in the delivery of services or benefits in any program or activity funded, in whole or in part, with funds appropriated to OVW, or appropriated pursuant to certain statutes that focus on violence against women.

These laws also prohibit ISP and subgrantees from retaliating against an individual for taking action or participating in action to secure rights protected by these laws.

III. COMPLAINT PROCEDURE: EXTERNAL PGR SUBGRANTEES

1. Any employee, applicant, client, customer, program participant or consumer of an external PGR subgrantee may report allegations of discrimination or retaliation.

2. Allegations of discriminatory or retaliatory conduct by an external PGR subgrantee should be reported in writing, via regular U.S. mail or email, to PGR's Grants and Contracts Management Supervisor:

Grants and Contracts Management Supervisor
ISP Pass-Through Grants and Research
700 S. Stratford Drive
Meridian, Idaho 83642
pgr@isp.idaho.gov

3. The complaint of discrimination or retaliation by an external PGR subgrantee must include:
 - a. The complaining party's name, address, telephone number, and email address;
 - b. An explanation of the conduct complained of, identity of the subgrantee and individuals involved, including any witnesses to that conduct, and where and when such conduct occurred; and
 - c. Specify the protected class that is the basis of the complaint (e.g. race, religion, sexual orientation).
4. Within 10 working days of PGR's receipt of an employment discrimination complaint, the PGR Grants and Contracts Management Supervisor will refer the complainant to the U.S. Equal Employment Opportunity Commission (EEOC) [Public Portal](#) for the complainant to submit an employment discrimination inquiry online. PGR will not investigate any complaints of discrimination.
5. Within 10 working days of PGR's receipt of a services discrimination complaint, the PGR Grants and Contracts Management Supervisor will refer it to DOJ, Office of Justice Programs, OCR at the following email: AskOCR@usdoj.gov.

PGR will confirm in writing with the complainant that they would like PGR to submit the complaint on their behalf and request that the complainant fill out the forms required by OCR: Complaint Verification Form and Identity Release Statement. Both of these are available under Office for Civil Rights on the [PGR website](#). A complainant may also file a written complaint directly with OCR via email, mail, or electronically by clicking the File a Complaint button on the [OCR website](#). The PGR Grants and Contracts Management Supervisor will also serve written notice to the complaining party, via email, that the report was received and forwarded to OCR. Notice is effective upon date of transmission of email. PGR will not investigate any complaints of discrimination.

6. Allegations of discrimination or retaliation may be reported by the victim or by other persons aware of the discriminatory or retaliatory behavior.
7. The complaint should be made as soon as possible upon the occurrence of the discriminatory or retaliatory behavior. Generally, complaints must be filed within 180 days or one (1) year from the date of the alleged discrimination, depending on the terms of the relevant statute.
8. If the allegation involves a pattern of discriminatory or retaliatory behavior, the complaint should be made as soon as possible. As stated above, generally, complaints must be filed within 180 days or one (1) year from the date of the most recent occurrence, depending on the terms of the relevant statute.

9. The complaint will be handled through the most confidential and direct means possible.
10. If a complaint alleging discrimination or retaliation is received by a subgrantee, the subgrantee may investigate and respond directly to the complaining party in writing, refer the report to PGR or refer the report directly to OCR. Whichever option the subgrantee chooses, notification must be sent to the complaining party in writing, via regular U.S. mail or email, within 10 working days. If the complaint is referred to OCR, a copy of the complaint must be forwarded to PGR.

IV. COMPLAINT PROCEDURE: INTERNAL ISP SUBGRANTEES

1. Any employee, applicant, client, customer, program participant or consumer of an internal ISP PGR subgrantee may report allegations of discrimination or retaliation.
2. Allegations of discriminatory or retaliatory conduct by an internal ISP PGR subgrantee should be reported to:

Idaho State Police
Human Resources
700 S. Stratford Drive
Meridian, Idaho 83642
(208) 884-7017

3. Any necessary investigation is conducted in accordance with ISP procedure 03.01 Incident Review and Administrative Investigation.
4. All ISP employees are required to complete annual respectful workplace training on discrimination and sexual harassment as part of the employee appraisal process. Documentation is maintained in Luma, the State of Idaho Human Capital Management system.
5. A complainant may also file a written complaint directly with OCR at the email listed in Section III of this procedure.

V. PROCEDURE DISSEMINATION

This procedure is posted under Office for Civil Rights on the [PGR website](#) and under the Administrative Guide document category in the PGR Grants Management System (GMS). Subgrantees are required to confirm knowledge of this procedure as a condition of their subaward. The Federal Civil Rights Compliance Checklist is incorporated into PGR's monitoring plan and addresses written subgrantee policies and procedures for responding to discrimination complaints that employees, applicants, clients, customers, program participants or consumers file directly with the subgrantee. The Grants and Contracts Management Supervisor provides information to PGR grant managers on their responsibilities under this subgrantee discrimination procedure.