## COMMUNITY DEVELOPMENT FINANCIAL INSTITUTIONS FUND

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# **CDFI Fund Title VI Compliance Worksheet Training Manual**

December 17, 2024

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## 1 Introduction

Award applicants must be compliant with federal civil rights requirements in order to be eligible to receive federal financial assistance awards from the CDFI Fund. This requirement applies to award applicants, as well as their prospective Subsidiary Insured Depository Institutions that will carry out award activities on behalf of Depository Institution Holding Company Applicants.

As a recipient or potential recipient of federal financial assistance, organizations are prohibited from discriminating against program participants because of their race, color, national origin, disability, and age. If the assistance provided by the CDFI Fund is to conduct an educational program, award recipients are also prohibited from discriminating against program participants because of their sex.

The CDFI Fund requests all award applicants complete a Title VI Compliance Worksheet (Worksheet) once annually with their application(s). The CDFI Fund will utilize the Worksheet to determine whether award applicants to the CDFI Fund are compliant with federal civil rights requirements. If an organization applies to multiple programs during the calendar year, they only need to submit one Worksheet annually.

The Worksheet is an online form submitted through the CDFI Fund's Awards Management Information System (AMIS). Completion of the Worksheet is requested for the Bank Enterprise Award Program, Capital Magnet Fund, CDFI Program, Native American CDFI Assistance Program, and the Small Dollar Loan Program, and future financial assistance programs yet to be determined. The Title VI Worksheet is not required for the New Markets Tax Credit Program or the CDFI Bond Guarantee Program. The Title VI Compliance Worksheet and program award terms and conditions do not impose antidiscrimination requirements on Tribal governments beyond what would otherwise apply under federal law.

#### About Treasury and Title VI

Title VI of the Civil Rights Act prohibits discrimination on the grounds of race, color, or national origin in programs or activities receiving federal financial assistance. The U.S. Department of the Treasury implements Title VI through regulations set forth in 31 C.F.R., Part 22 and conducts investigations of civil rights complaints filed against recipients of financial assistance under any of its programs and conducts pre- and post-award compliance reviews. Treasury can defer action on an application for federal financial assistance, issue a cautionary letter, or deny funding for applicants who are not in compliance with Title VI and other relevant civil rights laws.

More information about Title VI is available through the U.S. Department of the Treasury's <u>Office of Civil</u> <u>Rights and Equal Employment Opportunity</u>. The Office of Civil Rights and Equal Employment Opportunity also has a <u>poster available to download</u> for display in your offices.

The objective of this training manual is to provide applicants to the CDFI Fund with instructions on how to complete and submit the Worksheet in AMIS. If you have any questions regarding the Worksheet and/or require technical assistance, please submit a Service Request via your organization's AMIS account.

## 2 Complete the Title VI Compliance Worksheet in AMIS

The CDFI Fund will utilize the Worksheet to determine whether award applicants to the CDFI Fund are compliant with federal civil rights requirements.

- 1. To complete the Worksheet, log into your organization's AMIS account, click on the **Organizations** tab in the navigation bar and then click on the **Related** tab.
- 2. Locate the Title VI Compliance Worksheets related list and click the **New** button to start the Worksheet.

| CDFI       | HEUNDR                              |              |                            |                           |                  |  | ٩                  |      |                   | 🐥 🙆 Pet        | ter Parker |
|------------|-------------------------------------|--------------|----------------------------|---------------------------|------------------|--|--------------------|------|-------------------|----------------|------------|
| Home       | Organizations                       | Allocations  | Contacts                   | Service Areas             | Service Requests | Awards   | Reporting Schedule | l d  | CMF Performance R | eport N        | More 🗸     |
| <b>F</b> o | Organization<br>CDFI Test Organizat | ion          |                            |                           |                  |  |                    | Edit | Refresh SAM       | Printable View | ¥          |
| Туре       | Phone<br>(202) 555-1313             | Website      | Organization C<br>System A | owner<br>dministrator V 🖍 | Industry         | Mailing Address<br>601 Thirteenth St, N.W. St<br>Washington, DC 20005<br>USA | uite 200, North    |      |                   |                |            |
| Details    | Related<br>Title VI Compliance Wo   | rksheets (0) |                            |                           |                  |  |                    |      |                   |                | New        |

Figure 1: Organization Detail Page

3. The Title VI Compliance Worksheet will open; complete all required information and click **Save**.

Note: For assistance with completing the questions in the Worksheet, please refer to the U.S. Department of the Treasury's regulations implementing Title VI of the Civil Rights Act set forth in 31 C.F.R. Part 22. Applicants should review such regulations carefully before completing this Worksheet.

|  | ×  |                               |  |  |  |  |  |  |  |
|--|--|-------------------------------|--|--|--|--|--|--|--|
|  | New Title VI Compliance Worksheet  | 📮 🌊 Peter Parker              |  |  |  |  |  |  |  |
| Home Organizations Alk   | Information  | CMF Performance Report More V |  |  |  |  |  |  |  |
| CDFI Test Organization   | Title VI Compliance Worksheet Name Date Submitted  | Refresh SAM Printable View 🔻  |  |  |  |  |  |  |  |
| Type Phone<br>(202) 555-1313   | CDFI Test Organization   |                               |  |  |  |  |  |  |  |
| Details Related Title VI Compliance Worksher G Org Related Attachments (2) Document Name | I. Civil Rights Complaint Information     Ia     Has the Applicant had legal findings that they violated civil rights laws or civil rights complaints that resulted in any settlements in the last two years? If Yes, provide information on lawsuits and/or complaints such as case name, number; specific complaint, and date of case.     *Select Yes or hoto 1 a above     *None-     * Enter requested into if Yes to 1 a above | New                           |  |  |  |  |  |  |  |
| Certificate of Good Standing Instructions.docx<br>Cert of GS Reminders.pdf Contacts (6+) | th<br>Does the Applicant have any pending civil rights investigations, complaints, and/or lavsuits filed against them that pertain to<br>allegations of discrimination on the basis of race, color, and/or national origin? If Yes, provide information on the investigations,<br>complaints, and/or lavsuits such as case name, number, date of case, and status of case (e.g., discovery).   | View All                      |  |  |  |  |  |  |  |
| Contact Name   | *Select Yes or Noto 1b aboveNone   |                               |  |  |  |  |  |  |  |
| Oscar Abello   | Enter requested info if Yes to 1b above  | •                             |  |  |  |  |  |  |  |
|  | Cancel Save & New Save   |                               |  |  |  |  |  |  |  |
| Daniel Bartholomew   | Cancel Save & New Save   |                               |  |  |  |  |  |  |  |
| Scott Bowers   |  |                               |  |  |  |  |  |  |  |

Figure 2: Title VI Compliance Worksheet

4. If there are any issues when attempting to save, the Title VI Compliance Worksheet will display an **error screen** providing details on the issue(s). Please correct any errors and click **Save**.

|  | X  |                               |  |  |  |  |  |  |  |
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|  | New Title VI Compliance Worksheet  | 🐥 🏩 Peter Parker              |  |  |  |  |  |  |  |
| Home Organizations Allo                        | Review the errors on this page.  | CMF Performance Report More 🗸 |  |  |  |  |  |  |  |
| Organization<br>CDFI Test Organization         | These required fields must be completed: Select Yes or No to 1b above, Select Yes or No to 3d above, Select Yes or No to 4c above, Select Yes or No to 1c above, Select Yes or No to 4c above, Select Yes or No to 1c above, Select Yes or No to 3d above, Select Yes or No to 3d above, Select Yes or No to 2b ab | Refresh SAM Printable View 💌  |  |  |  |  |  |  |  |
| (202) 555-1313                                 | Information Title VI Compliance Worksheet Name Date Submitted  |                               |  |  |  |  |  |  |  |
| Details Related                                | * Organization   |                               |  |  |  |  |  |  |  |
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| Org Related Attachments (2) Document Name      | <ol> <li>Civil Rights Complaint Information         In         Has the Applicant had legal findings that they violated civil rights laws or civil rights complaints that resulted in any settlements in         the last two years? If Yes, provide information on lawsuits and/or complaints such as case name, number, specific complaint, and     </li> </ol>   |                               |  |  |  |  |  |  |  |
| Certificate of Good Standing Instructions.docx | date of case.<br>*Select Yes or No to 1a above   |                               |  |  |  |  |  |  |  |
| Cert of GS Reminders.pdf                       | Yes  |                               |  |  |  |  |  |  |  |
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| Contact Name                                   |  |                               |  |  |  |  |  |  |  |
| Oscar Abelio<br>Daniel Bartholomew             | Cancel Save & New Save   |                               |  |  |  |  |  |  |  |
| Scott Bowers                                   | bowerssigedh.treas.gov.disabled  |                               |  |  |  |  |  |  |  |

Figure 3: Title VI Compliance Worksheet Detail Error Message, Example 1

|  |  | ×                             |
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|  | New Title VI Compliance Worksheet  | 🐥 🏩 Peter Parker              |
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| Organization<br>CDFI Test Organization         |  | Refresh SAM Printable View    |
| Type Phone<br>(202) 555-1313                   | Information Title VI Compliance Worksheet Name Date Submitted  |                               |
|  | Organization     CDFI Test Organization     X  |                               |
| Details Related                                | 1. Civil Rights Complaint Information  |                               |
| Title VI Compliance Workshee                   | 1a<br>Has the Applicant had legal findings that they violated civil rights laws or civil rights complaints that resulted in any settlements in<br>the last two years? If Yes, provide information on lawsuits and/or complaints such as case name, number, specific complaint, and | New                           |
| Org Related Attachments (2)                    | date of case. *Select Yes or No to 1a above  |                               |
| Document Name                                  | Yes 💌  |                               |
| Certificate of Good Standing Instructions.docx | Enter requested info if Yes to 1a above  |                               |
| Cert of GS Reminders.pdf                       |  |                               |
|  |  | ViewAll                       |
|  | You have answered "Yes" above. Please provice the requested information.   |                               |
| Contacts (6+)                                  |  | New                           |
| Contact Name                                   | 1b<br>Does the Applicant have any pending civil rights investigations, complaints, and/or lawsuits filed against them that pertain to  |                               |
| Oscar Abello                                   | allegations of discrimination on the basis of race color and/or national origin? If Yes, provide information on the investigations   | <u> </u>                      |
| Daniel Bartholomew                             | Cancel Save & New Save   | •                             |
| Scott Bowers                                   | bowerssieldn.treas.gow.disabled  |                               |

Figure 4: Title VI Compliance Worksheet Detail Error Message, Example 2

5. The Worksheet is now successfully submitted as of the date and time listed in the **Date Submitted** field. Once the Worksheet has been reviewed, the CDFI Fund will contact your organization if any additional information is needed.

| CDFI FUN     | <b>P</b> r                                 |              |  |               |                |  | ٩                  |      |                  | <b>≜</b>       | eter Park |
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| Home         | Organizations                              | Allocations  | Contacts                                 | Service Areas | Service Reques | ts Awards  | Reporting Schedule | ¢    | MF Performance R | leport         | More 🔨    |
| CD Orga      | <sup>anization</sup><br>IFI Test Organizat | ion          |  |               |                |  |                    | Edit | Refresh SAM      | Printable View | •         |
| Туре         | Phone<br>(202) 555-1313                    | Website      | Organization Organization Organization O |               | Industry       | Mailing Address<br>601 Thirteenth St, N.W. Su<br>Washington, DC 20005<br>USA | ite 200, North     |      |                  |                |           |
| etails       | Related                                    |              |  |               |                |  |                    |      |                  |                |           |
| Title 🌆      | VI Compliance Wo                           | rksheets (1) |  |               |                | <u> </u>   |                    |      |                  |                | New       |
| Title VI Com | pliance Worksheet Name                     | C            | alendar Year                             |               | Date Submi     | tted   | Created            | By   |                  |                |           |
| TitleVI-0001 | 1207                                       | 2            | 021                                      |               | 12/20/2021     | . 7:00 PM  | Peter Pa           | rker |                  |                |           |
|              |  |              |  |               |                |  |                    |      |                  |                |           |

6. To review the information submitted, click on the **Title VI Compliance Worksheet Name**.

Figure 5: Title VI Compliance Worksheet Submission Detail