

PCCD Policy for Addressing Complaints Regarding Inherently Religious Activities

1. All grant agreements that provide for payment of federal funds by PCCD directly to any other party (a subgrantee) for use in providing a program shall contain the following provisions:

a. Grant funds shall not be used to support inherently religious activities, such as worship, religious instruction, or proselytization.

b. Grant funds shall not be used to purchase religious materials or pay for the supervisory, administrative, labor, or other costs of construction, maintenance, or repair of buildings that are used primarily as houses of worship or primarily for inherently religious activities.

c. The subgrantee's officers, employees, and volunteers shall not pressure or coerce any beneficiary of or participant in the funded program to attend or participate in any inherently religious activities.

d. If the subgrantee offers or engages in inherently religious activities, the activities must occur separately in time or location from the funded program, must be voluntary, and must occur in a manner that protects beneficiaries of and participants in the funded program from any pressure or coercion to take part in the activity.

e. The subgrantee shall keep the grant funds separate from any funds used to support inherently religious activities, and shall maintain separate financial records for the account that contains the grant funds.

- f. In identifying or admitting beneficiaries of or participants in the funded program, and in rendering assistance to beneficiaries of and participants in the funded program, the subgrantee must not discriminate against or among beneficiaries or participants based on religion, a religious belief, a refusal to express or hold a religious belief, or a refusal to attend or participate in an inherently religious activity.
 - g. If a statute or regulation applicable to particular grant funds prohibits the recipient of the funds from discriminating in hiring or employment based on religion, then the grant agreement between PCCD and the grantee must also incorporate that prohibition.
- 2. Paragraph 1 shall apply to all such grant agreements entered into by PCCD and grantees on or after November 1, 2007, including renewals awarded after November 1, 2007, of prior grant agreements.
- 3. PCCD shall monitor the compliance of each subgrantee with the provisions of Paragraph 1. Such monitoring shall include at least the following measures:
 - a. Conducting site visits (unannounced when reasonable), as reasonably necessary in response to complaints alleging violations of the terms of Paragraph 1, or on PCCD's own initiative where there exists reasonable cause to believe that a violation has or may have occurred.
 - b. Annual reviews of fiscal reports submitted by the subgrantee that relate to the grant funds; further review of financial and/or accounting records

maintained by the subgrantee as reasonably necessary in response to complaints alleging violations of the terms of Paragraph 1 or where there exists reasonable cause to believe that a violation has or may have occurred; and imposition, upon receipt of a complaint or other reasonable cause, of such additional reporting requirements upon the subgrantee as may be reasonably necessary in order for PCCD to determine whether a violation of the terms of Paragraph 1 has occurred or to prevent future violations.

c. Preparation of written reports documenting each visit referenced in Paragraph 3.a. above.

d. Such other measures as may be required by applicable law and contractual provisions.

4. PCCD shall require any subgrantee that contracts or subgrants any portion of the grant funds to a third-party contractor or subgrantee to include the requirements of Paragraph 1 in the third-party contract or subgrant terms, and to monitor the contractor's or subgrantee's compliance with those requirements as provided by Paragraph 3.
5. If a complaint is received from members of the public as well as from any beneficiaries of and participants in funded programs about any conduct that may be prohibited regarding inherently religious activities, then PCCD staff will immediately take this information to their supervisor for review and appropriate action. The supervisor will inform PCCD's Chief Counsel that a complaint has

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been received and the Chief Counsel will determine the appropriate steps to take to investigate and/or resolve the complaint.