

# OCAST SSBCI SBOP Application Title VI Narrative

## 1. Title VI Notice Posting

Oklahoma Center for the Advancement of Science and Technology (OCAST) ensures that the Title VI notice is prominently displayed to inform the public of our commitment to non-discrimination. The Title VI notice is posted in the following locations:

- **OCAST Headquarters:** Notices are displayed in the main lobby, reception areas, and other high-traffic locations within our offices.
- **Written Communications:** All written communications to beneficiaries, including grant award notifications, newsletters, and program announcements, include the Title VI notice.
- **OCAST Website:** The Title VI notice is prominently featured on the homepage and on relevant program pages of the OCAST website.

These postings ensure that employees, beneficiaries, and the general public are informed about our commitment to upholding Title VI.

## 2. Title VI Investigations, Complaints, or Lawsuits

As of the date of this narrative, OCAST has no pending Title VI investigations, complaints, or lawsuits related to allegations of discrimination on the basis of race, color, or national origin. OCAST maintains a strict non-discrimination policy and has established procedures to promptly address any complaints should they arise.

## 3. Title VI Compliance History – Not applicable

## 4. Membership of Oklahoma Science and Technology Research and Development (OSTRaD) Board

The nine member OSTRaD board governs OCAST, with legislation naming the State Secretary of Science and Innovation or another designee as appointed by the governor as the board chair, four members appointed by the governor, and two each by the state senate and house. Below is a table depicting the racial breakdown of the membership of these bodies:

Body	Total Members	Caucasian	African American	Hispanic	Asian	Other
OSTRaD	9	8	0	0	0	1

OCAST actively encourages the participation of minorities on the board through outreach efforts, including collaboration with minority professional organizations.

## 5. Location of Facilities

OCAST's main facility is located in an accessible urban area designed to ensure no person is denied access on the basis of race, color, or national origin. Future projects and programs will be evaluated to ensure facility locations do not have the effect of unnecessary discrimination.

## 6. Federal Agencies Providing Financial Assistance

OCAST receives federal financial assistance from the following agencies:

- US Department of Treasury, State Small Business Credit Initiative

## 7. Subrecipient Compliance Procedures

### Notifying Subrecipients of Civil Rights Requirements

OCAST utilizes a number of mechanisms during the application and award process to notify subrecipients of the applicable civil rights laws and nondiscrimination provisions. Notification occurs at the following contact points:

1. **Application Phase:** When applying for federal funds, all applications contain a general information section regarding the required compliance with federal civil rights laws to receive federal funding.
2. **Submission Phase:** In submitting an application, the applicant must agree to comply with the Standard/Certified Assurances which pertain to adherence to civil rights laws.
3. **Award Phase:** During the awarding of grant funds, the applicant must sign the Award Notice and all supporting documentation which identifies the required civil rights federal laws and requires adherence.
4. **OCAST Policies and Reporting Forms:** OCAST has developed policies and reporting forms for addressing discrimination complaints, available on the OCAST website.
5. **Training:** OCAST provides training to subrecipients on the administrative and financial management of federal grants, including information on compliance with civil rights laws.
6. **On-Site Monitoring Visits:** OCAST provides further information and training to subrecipients on compliance with federal civil rights laws during on-site monitoring visits.

### Monitoring for Compliance with Civil Rights Requirements

OCAST has developed a Monitoring Procedure Manual to outline the methods for monitoring subrecipients in the administrative, programmatic, and fiscal management of federal grant awards. Monitoring is one of the principal responsibilities of OCAST. An assigned OCAST Programs staff member serves as the lead and oversees each grant and is responsible for assisting subrecipients in implementing approved projects within a framework of relevant state and federal statutes, regulations, policies, procedures, and guidelines to achieve maximum success. Proactive monitoring ensures fiscal accountability and programmatic integrity are maintained.

## The monitoring process includes:

- **\*\*Ensuring projects are carried out in a manner consistent with subrecipient's stated goals and objectives.**
- **\*\*Identifying and resolving problems that may impede effective implementation of the project.**
- **\*\*Collecting data to provide comprehensive fiscal information to the accountant.**
- **\*\*Providing consultation and technical assistance to the subrecipient.**

Two forms of monitoring used by OCAST are on-site monitoring and desk reviews. Throughout the award period, a Programs staff member arranges on-site visits with subrecipients and request information for desk reviews. On-site monitoring involves using either an online, web-based monitoring form or a paper form. This process enables the Programs staff member to share and obtain information on the subrecipient's compliance with applicable civil rights laws and nondiscrimination provisions.

OCAST uses a risk assessment process to prioritize monitoring, ensuring programmatic and fiscal success of all subrecipients. The risk assessment helps identify subrecipients needing additional assistance to implement effective projects.

## Risk Assessment and Monitoring

At the beginning of each grant cycle, Programs staff member conducts a risk assessment of each subrecipient based on specific criteria:

- **Highest Risk:** Assigned to programs meeting 6 or more criteria.
- **Moderate Risk:** Assigned to programs meeting 4-5 criteria.
- **Lowest Risk:** Assigned to programs meeting 3 or fewer criteria.

Criteria include:

- **Administrative:** New subrecipient, changes in key personnel, past fiscal or programmatic issues, lack of previous monitoring visits, and submission of inaccurate documents.
- **Financial:** Late or incorrect fund requests, quarterly reports, and revised budgets.
- **Programmatic:** Late or incorrect reports, incomplete goals, delayed project start, and insufficient progress.

Based on the assigned risk value, the following actions are taken:

- **High Risk:** Minimum of one site visit and additional desk reviews if necessary.
- **Moderate Risk:** Minimum of one site visit or desk review.
- **Low Risk:** May not be monitored unless specific criteria apply. At a minimum, 50% of subgrantees receive a desk review or on-site visit each year.

## **Training Subrecipients on Civil Rights Requirements**

OCAST utilizes web-based conferences and in-person training to provide administrative and financial training for subrecipients. All new grant awardees or grantees with new Project Directors and/or Finance Officers must attend the training. Information on compliance with civil rights laws and nondiscrimination provisions is provided to subrecipients.

### **8. Language Assistance Plan**

OCAST is committed to providing language assistance to persons with limited English proficiency (LEP). Our plan includes:

- **Identification of LEP Persons:** Identifying individuals who need language assistance through surveys and interactions.
- **Language Assistance Measures:** Providing translation and interpretation services for critical documents and meetings. Ensuring vital information is available in multiple languages.
- **Training for Staff:** Training staff on how to effectively provide language assistance services.
- **Monitoring and Evaluation:** Regularly assessing the effectiveness of our language assistance plan and making necessary adjustments.

By implementing these measures, OCAST ensures compliance with Title VI and promotes an inclusive environment for all SSBCI SBOP program participants.