

COMMUNITY DEVELOPMENT  
FINANCIAL INSTITUTIONS FUND

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

*July 13, 2023*

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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 subrecipients that are not direct beneficiaries of federal financial assistance (e.g., Depository Institutions Holding Company and their Subsidiary Depository Institutions).

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 [Office of Civil Rights and Equal Employment Opportunity](#). The Office of Civil Rights and Equal Employment Opportunity also has a [poster available to download](#) 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.

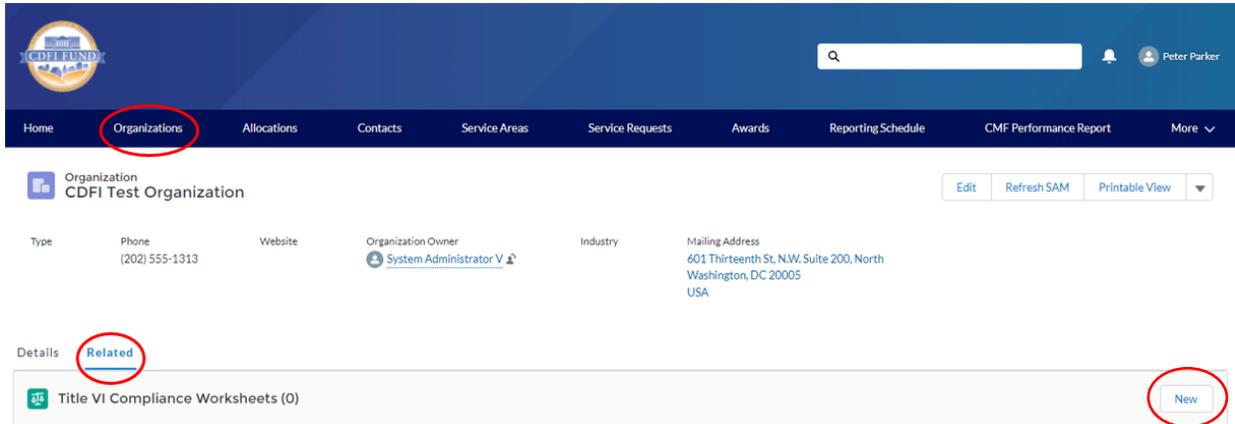


Figure 1: Organization Detail Page

- 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.

The screenshot shows a web application interface for creating a new Title VI Compliance Worksheet. The main window is titled "New Title VI Compliance Worksheet" and contains the following fields and sections:

- Information:**
  - Title VI Compliance Worksheet Name: [Empty]
  - Date Submitted: [Empty]
  - Organization: [CDFI Test Organization]
- 1. Civil Rights Complaint Information:**
  - 1a:** 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 No to 1a above: [--None--]
    - Enter requested info if Yes to 1a above: [Text area]
  - 1b:** Does the Applicant have any pending civil rights investigations, complaints, and/or lawsuits filed against them that pertain to allegations of discrimination on the basis of race, color, and/or national origin? If Yes, provide information on the investigations, complaints, and/or lawsuits such as case name, number, date of case, and status of case (e.g., discovery).
    - Select Yes or No to 1b above: [--None--]
    - Enter requested info if Yes to 1b above: [Text area]

At the bottom of the form are three buttons: "Cancel", "Save & New", and "Save". The background shows a sidebar with organization details for "CDFI Test Organization", including a phone number and a list of related documents and contacts.

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**.

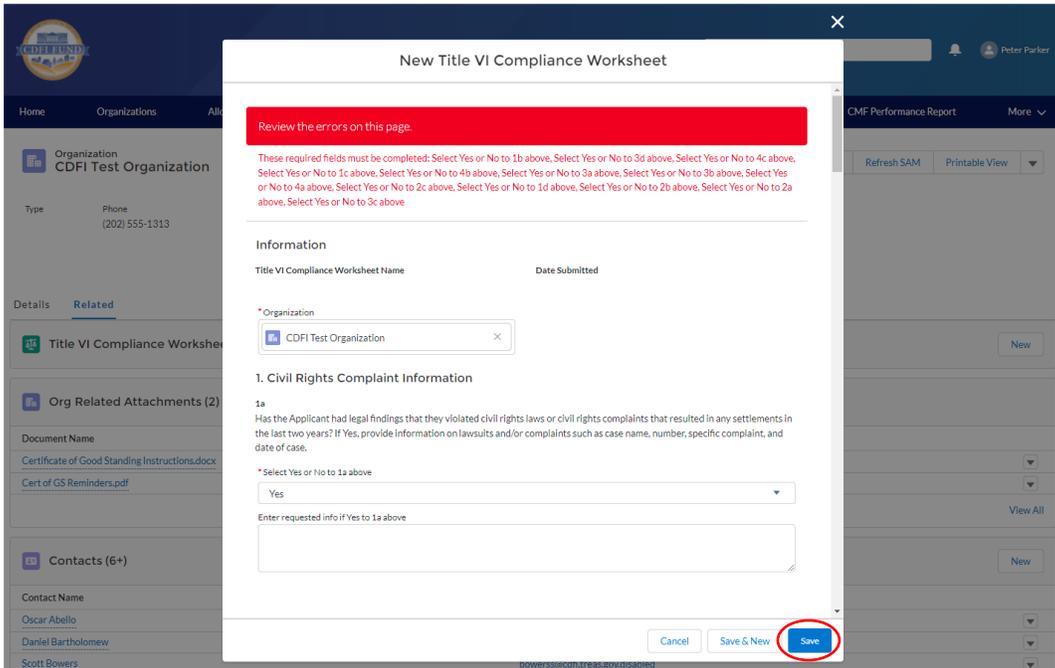


Figure 3: Title VI Compliance Worksheet Detail Error Message, Example 1

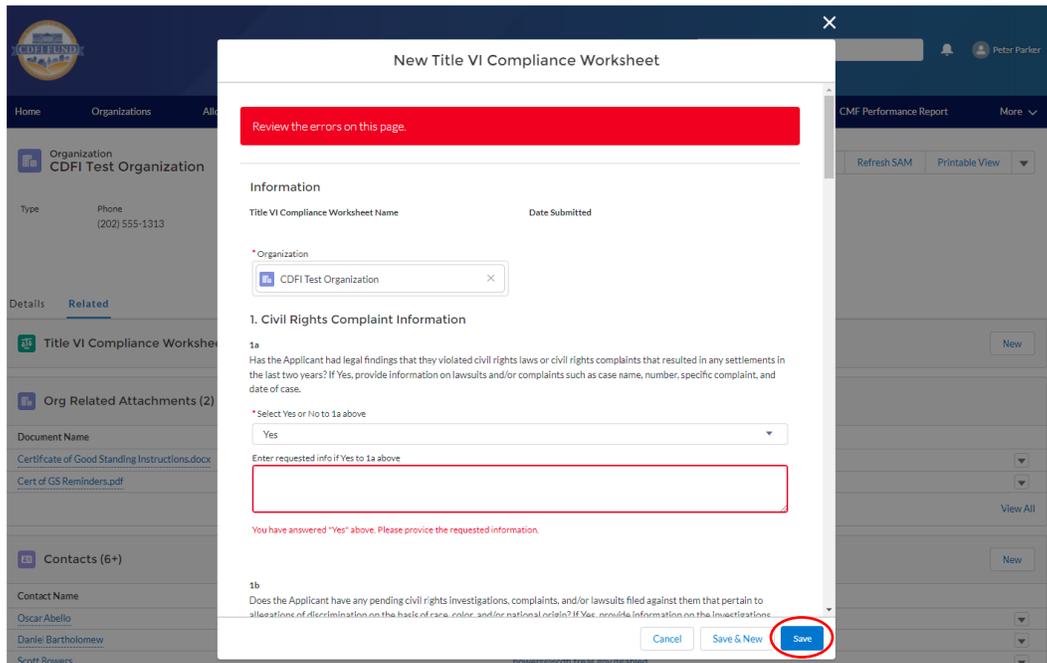


Figure 4: Title VI Compliance Worksheet Detail Error Message, Example 2

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

The screenshot displays the user interface for the CDFI Fund system. At the top, there is a navigation bar with the CDFI Fund logo on the left and a search bar, notification bell, and user profile (Peter Parker) on the right. Below the navigation bar is a menu with options: Home, Organizations, Allocations, Contacts, Service Areas, Service Requests, Awards, Reporting Schedule, CMF Performance Report, and More. The main content area shows the details for the 'CDFI Test Organization'. It includes fields for Type, Phone (202) 555-1313, Website, Organization Owner (System Administrator), Industry, and Mailing Address (601 Thirteenth St, N.W. Suite 200, North Washington, DC 20005 USA). Below this, there are tabs for 'Details' and 'Related'. The 'Related' tab is active, showing a table of 'Title VI Compliance Worksheets (1)'. The table has four columns: 'Title VI Compliance Worksheet Name', 'Calendar Year', 'Date Submitted', and 'Created By'. The first row contains the values: 'TitleVI-0001207', '2021', '12/20/2021 7:00 PM', and 'Peter Parker'. The 'TitleVI-0001207' and '12/20/2021 7:00 PM' cells are circled in red. There are 'Edit', 'Refresh SAM', and 'Printable View' buttons at the top right of the organization details. A 'New' button is at the top right of the worksheet table. A 'View All' link is at the bottom right of the table.

Title VI Compliance Worksheet Name	Calendar Year	Date Submitted	Created By
TitleVI-0001207	2021	12/20/2021 7:00 PM	Peter Parker

Figure 5: Title VI Compliance Worksheet Submission Detail