



Resilient Virginia Anti-Discrimination Policy

Resilient Virginia is committed to providing a safe, inclusive, and welcoming environment for all individuals. We believe in the inherent dignity and worth of every person and are dedicated to fostering a workplace culture that respects and values diversity in all its forms.

Scope:

This policy applies to all employees, volunteers, contractors, clients, and visitors of Resilient Virginia, regardless of their position or status within the organization.

Notice of Anti-Discrimination:

Resilient Virginia prohibits discrimination, harassment, retaliation, and intimidation based on race, color, religion, sex, national origin, age, marital status, disability, or any other characteristic protected by law. This includes, but is not limited to, discrimination, harassment, intimidation or retaliation in hiring, compensation, promotion, termination, and all other aspects of employment or participation in organizational activities.

This policy is based on rights protected by 40 C.F.R Parts 5 and 7 (Nondiscrimination in Programs or Activities Receiving Federal Assistance from the Environmental Protection Agency), including:

Title VI of the Civil Rights Act of 1964, [42 U.S.C. §§ 2000d et seq.](#), [40 C.F.R. Part 7](#); **Title IX of the Education Amendments of 1972**, as amended, [20 U.S.C. §§ 1681 et seq.](#), [40 C.F.R. Part 5](#); **Section 504 of the Rehabilitation Act of 1973**, as amended, [29 U.S.C. § 794](#), [40 C.F.R. Part 7](#); the **Age Discrimination Act of 1975**, [42 U.S.C. §§ 6101 et seq.](#), [40 C.F.R. Part 7, Subpart F](#), and **Section 13 of the Federal Water Pollution Control Act Amendments of 1972**, [Pub. L. 92-500 § 13](#), 86 Stat. 903 (codified as amended at [33 U.S.C. § 1251 et seq.](#) (1972)), [40 C.F.R. Part 7](#).

Prohibited Conduct:

Discriminatory or harassing behavior, including but not limited to the following, will not be tolerated:

- Making derogatory or offensive remarks, jokes, or gestures related to a person's protected characteristic.
- Displaying or distributing materials that promote stereotypes or prejudices.
- Denying opportunities for advancement or participation based on a person's protected characteristic.
- Engaging in retaliation against any individual who reports discrimination or harassment or participates in an investigation of such complaints.
- Engaging in other discriminatory acts through program activities.

Responsibilities:



- Resilient Virginia Management: Management is responsible for promoting a culture of diversity and inclusion, enforcing this policy, and taking appropriate action in response to reports of discrimination or harassment.
- Employees: All employees are expected to treat others with respect and refrain from engaging in discriminatory or harassing behavior.

Notice of Policy:

Resilient Virginia will prominently display this anti-discrimination policy notice in all relevant locations, including but not limited to offices, websites, and program materials.

Procedure: This non-discrimination policy will be posted in the organization office (if applicable), on the website (under the Policy Statements section), and distributed to the public as part of general organizational information.

Designated Non-Discrimination Coordinator:

Resilient Virginia will designate an individual to serve as the Non-Discrimination Coordinator responsible for overseeing compliance with anti-discrimination laws and addressing any complaints or concerns related to discrimination or accessibility.

Procedure: The Non-Discrimination Coordinator (as of 4/30/2024) is Annette Osso, Managing Director, who can be contacted at osso@resilientvirginia.org or 703-629-1650.

Reporting a Grievance:

Any staff person or volunteer who believes they have been subjected to discrimination or harassment, or who has witnessed such behavior, should report it to the Non-Discrimination Coordinator. If a member of the public or attendee of an event believes they have been subjected to discrimination or harassment, they should report it to the Non-Discrimination Coordinator. Filing a grievance should be carried out in writing to the Non-Discrimination Coordinator, who will take necessary steps to remedy the situation and circumstances to assure the prompt and fair resolution of complaints.

Procedure: The complaint shall be in writing and contain information about the complainant and the alleged discrimination such as:

1. The name, address, and phone number of complainant;
2. The location, date, and description of the alleged violation; and
3. The signature of the complainant or his or her designee.

If the complainant is unable to submit the complaint in writing, they may call the Non-Discrimination Coordinator to submit a verbal complaint. The complaint shall be submitted by the complainant or his or her designee as soon as possible but no later than 180 calendar days after the alleged violation to:

Annette Osso, Managing Director
Non-Discrimination Coordinator
PO Box 309
Gordonsville, VA 22942
osso@resilientvirginia.org/703-629-1650

Investigation and Resolution:

Resilient Virginia will promptly and thoroughly investigate all reports of discrimination or harassment. Investigations will be conducted in a fair and impartial manner, and appropriate corrective action will be taken against individuals found to have violated this policy. Confidentiality will be maintained to the extent possible, consistent with the need to conduct a thorough investigation.

Procedure: Within 10 calendar days after receipt of the complaint, the Non-Discrimination Coordinator will make a determination of whether Resilient Virginia has jurisdiction over the complaint and send the complainant an acknowledgment letter informing them whether the complaint will be investigated. This letter will also inform the complainant of their right to file directly with the appropriate federal agency. An investigation of the complaint may include interviews of the complainant, employees, contractors, subcontractors, subgrantees, and witnesses to the alleged discrimination, as well as review of any physical or written evidence.

The Non-Discrimination Coordinator may attempt to conciliate and resolve the complaint through a mutually agreeable solution. Any such informal resolution must be signed by both the Non-Discrimination Coordinator and the complainant. Absent extenuating circumstances, the Non-Discrimination Coordinator will complete their investigation and resolution efforts within 30 days after beginning the investigation.

An appropriate, prompt, and impartial investigation of any allegations filed under federal non-discrimination statutes will be conducted. A preponderance of the evidence standard will be applied during the analysis of the complaint.

When the Non-Discrimination Coordinator determines that discrimination has occurred, and an informal resolution is not reached, they shall determine any necessary remedial actions.

Absent extenuating circumstances, the Non-Discrimination Coordinator will provide a written response to the complaint within 45 calendar days after beginning the investigation. The Coordinator will issue one of three letters:

1. a closure letter summarizing the allegations and stating that there was not a violation and that the case will be closed; or
2. a letter of resolution summarizing the allegations and describing the informal resolution mutually agreed to by the complainant and Resilient Virginia about which the complaint was submitted; or
3. a letter of finding (“LOF”) summarizing the allegations and the investigation of the alleged complaint and explaining any remedial action to be taken by Resilient Virginia.



If the complainant wishes to appeal the decision, they have ten (10) days after the date of the closure letter or the LOF to do so. A written appeal would be sent to the Resilient Virginia Board of Directors Chairman at PO Box 309, Gordonsville, VA 22942..

If at any time a delay is expected, the Non-Discrimination Coordinator will notify the complainant in writing of the reasons(s) for the delay and the expected date for a response.

The Non-Discrimination Coordinator shall maintain records of complaints received, informal resolutions, investigation findings, appeals, and appeal decisions. The Non-Discrimination Coordinator shall document actions taken to resolve each complaint, communicate complaint activity to the appropriate federal agency as required, and maintain copies of complaints and documentation of their resolution for a period of not less than two (2) years.

The Non-Discrimination Coordinator (through the Executive Director) shall furnish a report to the Board of Directors at least annually regarding the number, nature, and status of complaints.

Data Collection:

Resilient Virginia will maintain demographic data on the race, color, national origin, sex, age, or disability status of the population it serves, where required for Federal contract reporting purposes and in compliance with applicable laws and regulations. If demographic information is required, it will be utilized to understand the special communication and participation needs of the community being engaged to ensure public involvement is available to all persons regardless of race, color, national origin, disability, age, sex, or prior exercise of rights or opposition to actions protected under federal non-discrimination laws. Demographic classifications set forth in CFR 7.25 will be used for categorization. All demographic data collected for federal grants will be maintained for at least (3) three years after grant close out.

Procedure: Resilient Virginia’s Project Manager for a federal grant will work with project technical specialists to collect and maintain the project demographic data on the organization’s Google Drive in Excel format.

Accessibility:

Resilient Virginia will make reasonable accommodations to ensure that individuals with impaired vision or hearing or limited English proficiency can participate fully in our program activities. This includes providing auxiliary aids and services as needed at no cost to the individual.

Procedure:

Virtual Activities:

This notice will be included on registration information for virtual events.

If you are a person with a disability or limited English proficiency and want to request special accommodations to participate in a Resilient Virginia virtual



activity, please contact Annette Osso, Managing Director, at osso@resilientvirginia or 703-629-1650 during business hours of 9 a.m. to 4 p.m. to discuss reasonable accommodations five days prior to the event.

For activities that are virtual Resilient Virginia will incorporate real-time captioning or transcription services for those with hearing impairments.

In-Person Events:

This notification will be included on registration information for in-person events.

If you are a person with a disability or limited English proficiency and desire any assistive devices, services, or other accommodations to participate in a Resilient Virginia activity, please contact Annette Osso, Managing Director at osso@resilientvirginia.org or 703-629-1650 during business hours of 9 a.m. to 4 p.m. to discuss reasonable accommodations five days prior to the event.

Resilient Virginia will ensure that the location of public meetings will include accessibility for individuals with physical disabilities and will consider access to public transportation when making decisions about event location. For in-person activities providing food, we will provide the means for individuals to indicate allergy/special needs on our registration forms and provide reasonable accommodations. We will provide, if necessary, reasonable accommodations for individuals who are deaf or hard of hearing and to other individuals who need additional assistance for effective communication and participation.

Language Access:

Resilient Virginia will provide reasonable accommodations to assure meaningful access to services for persons with limited English proficiency. This includes providing translation and interpretation services as needed to ensure effective communication at no cost to the individual.

Procedure: We will provide, if necessary, reasonable accommodations for limited English proficient participants, including on-site translator services, to ensure effective communication and participation.

Non-Retaliation or Intimidation:

Retaliation or intimidation against any individual who reports discrimination or harassment, participates in an investigation, or otherwise opposes discriminatory practices is strictly prohibited and will result in disciplinary action, up to and including termination of employment or participation in organizational activities.

Training and Education:

Resilient Virginia will provide periodic training and education to employees, volunteers, and contractors on the principles of equal opportunity, diversity, and inclusion, as well as the procedures for reporting and addressing discrimination and harassment.



Review and Revision:

This policy will be reviewed annually and updated as necessary to ensure its effectiveness and compliance with applicable laws and regulations.

Resilient Virginia is committed to creating a workplace and organizational culture that values and celebrates the unique contributions of all individuals. By adhering to this policy, we can foster an environment where everyone can thrive and contribute to our mission effectively.

Approved by the Resilient Virginia Board of Directors on May 28, 2024.