

## **Nondiscrimination Policy and Procedures**

Last Revision Date: October 16, 2023

Distribution: All GLC Employees and GLC Website

### **Policy**

The Great Lakes Commission (GLC) does not discriminate on the basis of race, color, religion, age, sex, national origin, disability status, genetics, protected veteran status, marital status, political affiliation, sexual orientation, gender identity or expression, or any other characteristic protected by federal nondiscrimination laws in the administration of GLC programs or activities. The GLC does not intimidate or retaliate against any individual(s) because they have exercised their rights to participate in or oppose actions protected by applicable laws and regulations, or for the purpose of interfering with such rights, and claims of intimidation and retaliation will be handled promptly if they occur.

### **Background**

The GLC is a direct recipient of Federal financial assistance. All recipients are required to comply with Title VI of the Civil Rights Act of 1964, as well as related federal nondiscrimination statutes and regulations. This includes Title 40 of the Code of Federal Regulations (CFR), Part 7, Nondiscrimination in Programs or Activities Receiving Federal Assistance from the Environmental Protection Agency, prohibits discrimination on the basis of race, color, national origin, age, sex, or disability in programs or activities receiving federal assistance from the United States Environmental Protection Agency (U.S. EPA). It requires recipients of federal assistance from the U.S. EPA to:

- A. Collect, maintain, and provide information showing compliance with 40 CFR Part 7.
- B. Designate a person to be the Nondiscrimination Compliance Coordinator to coordinate efforts to comply with 40 CFR Part 7.
- C. Adopt grievance procedures that assure the prompt and fair resolution of discrimination complaints alleging violations of 40 CFR Part 7.
- D. Provide continuing and prominent public notice of nondiscrimination on the basis of race, color, national origin, age, sex, or disability, and of the identity and contact information for the Nondiscrimination Compliance Coordinator.

As set forth above, it is GLC policy not to discriminate on the basis of several factors, including those in 40 CFR Part 7 and other applicable federal nondiscrimination laws. The GLC gives public notice of its nondiscrimination policy to ensure compliance with such statutes and regulations in federally funded GLC programs and activities.

### **Nondiscrimination Coordinator**

The GLC Nondiscrimination Coordinator is responsible for coordination of compliance efforts and receipt of inquiries concerning nondiscrimination requirements implemented by federal nondiscrimination laws. If you have any questions about this notice or any GLC nondiscrimination programs, policies or procedures, you may contact:

Joe Bertram  
Great Lakes Commission  
1300 Victors Way, Suite 1350  
Ann Arbor, MI 48105  
734-971-9135  
[Jbertram@glc.org](mailto:Jbertram@glc.org)

If you believe that you have been discriminated against with respect to a GLC program or activity, you may contact the nondiscrimination coordinator identified above or visit our website at [www.glc.org](http://www.glc.org) to learn how and where to file a complaint of discrimination.

### **Meaningful Access to Programs and Activities**

The GLC will generally, upon request, provide appropriate and reasonable accommodations for communication for qualified persons with disabilities and those with Limited English Proficiency so they can participate equally in federally funded GLC programs and activities. Please contact the nondiscrimination coordinator identified above to make an accommodation request related to a disability or Limited English Proficiency. This may include, but is not limited to, requests to translate vital documents, or providing interpretation, auxiliary aids or related services at live proceedings. Requests for language interpretation services or for disability accommodations should be made at least 72 hours in advance of any proceeding.

### **Grievance Procedure**

Anyone who believes they may have experienced discrimination in violation of the GLC nondiscrimination policy may file a written complaint using the following procedure. Appropriate bases for filing a complaint include alleged discrimination as a consequence of a GLC program or activity based on protected classes including race, color, religion, age, sex, national origin, disability status, genetics, protected veteran status, marital status, political affiliation, sexual orientation, gender identity or expression, or any other characteristic protected by federal nondiscrimination laws. A written discrimination complaint must be filed within 180 calendar days of the date the alleged discrimination occurred. To file a complaint, please send an email or letter to the nondiscrimination coordinator with all of the following information:

- Full Name (First, Last and Middle Initial)
- Full Address (Street Address, City, State, Zip Code)
- Email Address
- Telephone Number (including area code)
- Best time to call
- Alternate Telephone Number (including area code) (if applicable)
- A complete description of the specific issue or issues you believe were noncompliant
- The specific location or locations of the issues prompting the complaint
- Date when the noncompliance occurred / was noted

Upon submission of a completed discrimination complaint, GLC will review and investigate the grievance. GLC will gather information to verify the facts stated in the complaint and assess whether discrimination has occurred and take appropriate action. The preponderance of the evidence standard (which generally means, “more likely than not”) will be applied during the investigation and analysis of the complaint. The Nondiscrimination Coordinator will contact the complainant to discuss the complaint and the possible resolutions and may assist the complainant in reaching an informal resolution by working with the agency to address the issue(s) raised. Intimidation of or retaliation against a complainant are prohibited, and claims of intimidation or retaliation will be handled promptly and fairly in the same manner as other claims of discrimination.

Complainants also have the right to file a federal civil rights complaint of alleged discrimination with the U.S. Environmental Protection Agency, Office of Civil Rights, at:

U.S. Environmental Protection Agency  
Director of the Office of Civil Rights  
Mail Code 1201A  
1200 Pennsylvania Ave, NW  
Washington DC 20460  
202-564-7272 (voice)  
202-565-0196 (fax)  
[Title VI Complaints@epa.gov](mailto:Title_VI_Complaints@epa.gov)