

NON-DISCRIMINATION POLICY AND COMPLAINT PROCEDURE

Non-Discrimination Policy

GNRC does not discriminate on the basis of race, color, national origin, including limited English proficiency (LEP), gender, gender identity, sexual orientation, age, religion, creed or disability in admission to, access to, or operations of its programs, services, or activities. Discrimination against any person in recruitment, examination, appointment, training, promotion, retention, discipline or any other employment practices because of non-merit factors is prohibited. Any person who believes that discrimination has occurred by GNRC, or its contractors, sub-recipient and/or consultants on the basis of race, color or national origin, including limited English proficiency (LEP), in violation of Title VI may file a written complaint. Complaints may also be filed with the state or federal agency involved, and with the Tennessee Human Rights Commission. Complaints must be filed within 180 days of the alleged discriminatory act.

Complaint Procedure

This procedure applies to all complaints filed under Title VI, Title VII of the Civil Rights Act of 1964, the Americans with Disabilities Act, Section 1557 of the Affordable Care Act, and any other applicable federal or state law that relates to any program or activity administered by the GNRC or its sub-recipients, contractors, and/or consultants. Although Title VI only relates to discrimination based on race, color, or national origin, and is the only provision requiring GNRC to have an affirmative action plan, GNRC consolidates all discrimination claims into a single basic procedure as provided below.

If you feel that you have been discriminated against because of your race, color, religion, sex (including pregnancy, gender identity, and sexual orientation) national origin, age (40 and older) disability, or genetic information then you may file a complaint of discrimination.

This procedure does not prohibit the complainant from filing formal complaints with State or Federal agencies, or prevent the complainant from seeking private counsel for complaints alleging discrimination.

The GNRC Title VI and Nondiscrimination Coordinator will make every effort to pursue and obtain a resolution of the complaint. Initial interviews will be conducted with the complainant and the respondent to determine the circumstances surrounding the complaint.

1. Any individual, group of individuals, or agency that believes that they have been discriminated against according to the Title VI or other nondiscrimination provisions may file a complaint with the Title VI and Nondiscrimination Coordinator. Under federal law, a formal federal complaint must generally be filed within 180 calendar days of the alleged occurrence or when the alleged discrimination became known to the complainant. Therefore, if the complainant wishes to file an internal or external complaint, he/she must file the complaint within (180) days after the alleged discrimination. Complaints may be filed at the organization or agency at which they originate, and/or the appropriate State or Federal Agency. For example, a complaint alleging discrimination against a program or service funded through the Tennessee Commission on Aging and Disability (TCAD) may be filed at the Area Agency on Aging and Disability (AAAD) or other grantee agency level, as well as at the State Commission level (TCAD). Complaints may also be filed with Tennessee Human Rights Commission, the Regional Office for Civil Rights of the U.S. Department of Health and Human Services, and/or the U.S. Equal Employment Opportunity Commission. All Title VI complaints received by GNRC will be forwarded to the appropriate state agency to keep them informed. The requirements of the internal complaint are as follows:

- a. The complaint must be in writing and signed by the complainant(s).
 - b. The complaint must include the date of the alleged act of discrimination and/or the date in which the complaint(s) became aware of the alleged discrimination. Additionally, the Complaint must include the date in which the conduct was discontinued and/or the date in which the most recent conduct occurred.
 - c. The complaint must include a detailed description of the issues and must include names and job titles of those alleged as parties in the complaint.
 - d. If the Title VI and Nondiscrimination Coordinator receives the complaint by fax or email, she will respond to the complainant in writing to determine if the complainant intends to proceed with the complaint.
2. Once it has been determined that the complainant wishes to move forward with a complaint, a complaint form will be forwarded to the complainant. When completing the form, please make sure that you do all of the following;
- a. Clearly print your answers;
 - b. Answer all questions that apply to your allegations;
 - c. Sign and date the complaint form;
 - d. Submit the original form to the GNRC Title VI and Nondiscrimination Coordinator:

Grant Kehler
Title VI and Nondiscrimination Coordinator
220 Athens Way, Suite 200
Nashville, Tennessee 37228
gkehler@gnrc.org

3. Be sure to keep the GNRC Title VI and Nondiscrimination Coordinator informed of any changes in your address and contact information.
4. Once the complaint is received by the Title VI and Nondiscrimination Coordinator, she will determine its jurisdiction, acceptability, and need for additional information. The Coordinator will also either investigate the merit of the complaint or refer the complaint to an authorized state or federal agency, individual, or firm to be investigated. If it is determined that the complaint is against one of GNRC's sub-recipients of Federal funds, GNRC will assume jurisdiction or will refer the case to an appropriate agency to be investigated and adjudicated. Complaints against GNRC will be referred to the appropriate State or Federal Agency for proper disposition pursuant to their procedures.
5. The Complaint will be accepted if it meets the following criteria:
- a. The complaint must be filed within 180 days of the occurrence or when the alleged discrimination became known to the complainant.
 - b. The alleged conduct must involve a covered basis such as race, color, gender, disability, national origin, religion, creed, familial status, or age (40 and older).
 - c. The alleged conduct must involve a federally funded program or activity of GNRC, its sub-recipients, contractors and/or consultants.
6. A complaint may be dismissed for the following reasons:

- a. The complainant requests the withdrawal of the complaint.
 - b. The complainant fails to respond after repeated requests for additional information needed to process the complaint.
 - c. The complainant cannot be located after reasonable attempts.
7. Once GNRC accepts the complaint for investigation, both the complainant and respondent will be notified within seven (7) calendar days. The complaint will then be filed into GNRC's records identifying its basis and alleged harm.
8. If GNRC assumes the investigation, GNRC will provide the respondent with the opportunity to respond to the allegations in writing. The respondent will have ten (10) calendar days to respond from the date of GNRC's written notification of acceptance of the complaint to provide the Title VI Coordinator with a response to the allegations.
9. GNRC's final investigative report will be forwarded to the appropriate State or Federal agencies, if applicable, and affected parties with sixty (60) calendar days of the acceptance of the complaint.
10. GNRC will notify the parties of its final decision.
11. If the complainant is not satisfied with the results of the investigation of the alleged discrimination and practices, the complainant will be advised of the right to appeal to the appropriate State or Federal Agency.
12. The public can obtain a form through GNRC's website at www.gnrc.org