



## **DISCRIMINATION COMPLAINT AND COMPLIANCE** **REVIEW / GRIEVANCE PROCEDURE**

It is the policy of the City of Willard to ensure full compliance with federal non-discrimination laws in all programs and activities. The City of Willard will not discriminate based on race, color, national origin, religion, ancestry, ethnic group identification, creed, sex (including actual or perceived sexual orientation or gender identity), disability, mental disability, physical disability, medical condition, genetic information, marital status, veteran status, or age, and any City of Willard programs, services, or activities.

Title VI of Civil Rights Act of 1964 (“Title VI”) prohibits discrimination based on race, color, and national origin in programs and activities receiving federal financial assistance. The Americans with Disability Act (“ADA”) and Section 504 of the Rehabilitation Act (“Section 504”) prohibit discrimination on the basis of disability by state or local government agencies and recipients of federal financial assistance.

Discrimination includes, but is not limited to, excluding an individual from participation in or denying an individual the benefits of any program or activity receiving Federal financial assistance due to the individual's race, color, national origin, sex, age, or disability.

The City of Willard does not exclude, deny benefits to, or otherwise discriminate against any person on the basis of race, color, religion, ancestry, ethnic group identification, national origin, creed, disability, mental disability, physical disability, medical condition, genetic information, marital status, age, veteran status or sex (including actual or perceived sexual orientation or gender identity) in the administration of the City of Willard programs or activities.

The City of Willard is committed to taking reasonable steps to provide timely and meaningful access for Limited English Proficient Persons encountering the City of Willard’s programs, services, and activities. The City of Willard will provide free language assistance to such persons. For more information on language assistance, contact:

Dona Slater, City Clerk  
Non-Discrimination Coordinator  
City of Willard  
P. O. Box 187, 224 W. Jackson St.  
Willard, MO 65781

Telephone:417-742-5302  
[clerk@cityofwillard.org](mailto:clerk@cityofwillard.org)

This complaint and compliance review/grievance procedure is established so that any member of the public who believes he or she been subjected to discrimination in the receipt of benefits and/or services from the City of Willard on the basis of race, color, religion, ancestry, ethnic group identification, national origin, creed, disability, mental disability, physical disability, medical condition, genetic information, marital status, age, veteran's status, or sex (including the actual or perceived sexual orientation or gender identity) and wishes to file a complaint may do so following the outline below. In addition, the City of Willard's Non-Discrimination Coordinator may, on her own initiative, undertake compliance reviews to investigate compliance with the City of Willard's departments with Title VI, the ADA, Section 504, and other federal and state civil rights laws in the absence of a complaint on a periodic basis. The City of Willard is prohibited from the intimidation of or retaliating against any member of the public who files a complaint under these procedures and any intimidation or retaliation will be handled promptly if it occurs.

The complaint should be in writing and contain information about the complaint and the alleged discrimination such as:

1. The name, address, and phone number of the complainant;
2. The name of the City of Willard department and/or employee against whom the complaint is filed;
3. The location, date, and description of alleged violation;
4. The signature of the complainant or his/her designee.

Please see the Discrimination Complaint Form at the end of this procedure.

The City of Willard assures the prompt and fair resolution of complaints which allege violation of federal non-discrimination laws.

If the complainant is unable to submit the complaint in writing, he or she may call the City of Willard Non-Discrimination Coordinator to submit a verbal complaint.

The complaint shall be submitted by the complainant or his/her designee as soon as possible but no later than 180 calendar days after the alleged violation to:

Dona Slater, City Clerk  
Non-Discrimination Coordinator  
City of Willard  
P. O. Box 187  
224 W. Jackson St.  
Willard, MO 65781

Telephone:417-742-5302  
[clerk@cityofwillard.org](mailto:clerk@cityofwillard.org)

Discrimination Complaint and Compliance Review/Grievance Procedure. Adopted 2-26-24

If the complaint is submitted directly to a City of Willard office or staff member, the City of Willard office or staff member shall forward the complaint to the City of Willard Non-Discrimination Coordinator within 5 calendar days.

1. The City of Willard Non-Discrimination Coordinator will make its determination of whether the City of Willard has jurisdiction over the complaint and send the complainant an acknowledgement letter informing him/her whether the complaint will be investigated. This letter will also inform the complainant of his/her rights to file directly with the federal agency.
2. If the City of Willard Non-Discrimination Coordinator finds jurisdiction, he/she will notify the leadership of the City of Willard that is the subject of the complaint and request a response to the complaint and will begin an investigation. The investigation may include interviews with the complainant, City of Willard employees, contractors, subcontractors, subgrantees, and witnesses to the alleged discrimination, as well as review of any physical or written evidence.

The City of Willard Non-Discrimination Coordinator may attempt to reconcile and resolve the complaint through a mutually agreeable solution. Any such informal resolution must be signed by both the City of Willard that is the subject of the complaint, and the complainant. Absent extenuating circumstances, the City of Willard's Non-Discrimination Coordinator will complete his/her investigation and resolution efforts within 30 days after the beginning of the investigation.

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

When the City of Willard Non-Discrimination Coordinator determines the discrimination has occurred, and informal resolution is not reached, the City of Willard Non-Discrimination Coordinator shall determine any necessary remedial actions and the complained-of City of Willard to implement the recommendations.

Absent extenuating circumstances, the City of Willard 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 there was not a violation and that the case will be closed; or
2. A letter of resolution summarizing allegations and describing the informal resolution mutually agreed to by the complainant and The City of Willard about which the complaint was submitted; or
3. A letter of finding ("LOF") summarizing allegations and investigation of the alleged complaint and explaining any remedial action to be taken by the City of Willard.

If the response is not satisfactorily resolving the issue, the complainant or the City of Willard may appeal the decision to the City of Willard's City Administrator within 15 calendar days after receipt of the response from the City of Willard Non-Discrimination Coordinator.

Within 15 calendar days after receiving the appeal, the City of Willard City Administrator or his/her designee will meet with a complainant and the affected City of Willard department to discuss the complaint and possible resolutions. The City of Willard's City Administrator or his/her designee may also interview witnesses and review any physical or written evidence. Within 15 calendar days after the meeting with the complainant and the City of Willard department, the City of Willard's City Administrator or his/her designee will respond in writing to the complainant, with a final resolution of the complaint.

If at any time a delay is expected, the City of Willard Civil Rights Compliance Coordinator will notify the complainant in writing of the reason(s) for the delay and the expected date of response.

The City of Willard Civil Non-Discrimination Coordinator shall maintain records of complaints received, informal resolutions, investigation findings, appeals, and appeal decisions. The City of Willard 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 the resolution for a period not less than two (2) years.

The City of Willard Non-Discrimination Coordinator will annually review and revise as necessary the grievance procedures to ensure prompt and fair resolution of discrimination complaints.

The City of Willard Non-Discrimination Coordinator through the City Administrator shall furnish a report to the City of Willard Board of Aldermen at least annually regarding the number, nature, and status of complaints.

These procedures do not deny the right of the complainant to file a complaint with state or federal agencies, or to pursue litigation for complaints alleging discrimination, intimidation, or retaliation that is prohibited by law.