

VIRGINIA FIRE CHIEFS' ASSOCIATION DISCRIMINATION COMPLAINTS PROCESS

This document discusses the notification and basic elements in which the Virginia Fire Chiefs Association, Inc. (VFCA) receives and responds to discrimination complaints from its external-facing programs, activities, and services.

The Virginia Fire Chiefs Association, Inc. (VFCA) strives to comply with federal civil rights laws and is committed to providing its programs and services without discrimination in accordance with:

- Title VI of the Civil Rights Act of 1964, which prohibits discrimination based on race, color, or national origin (including Limited English Proficiency).
- Section 504 of the Rehabilitation Act of 1973, which prohibits discrimination based on disability.
- Title IX of the Education Amendments Act of 1972, which prohibits discrimination based on sex in education programs or activities.
- Age Discrimination Act of 1975, which prohibits discrimination based on age.
- U.S. Department of Homeland Security regulation 6 C.F.R. Part 19, which prohibits discrimination based on religion in social service programs.

In addition, the VFCA is committed to taking reasonable steps to provide meaningful access for individuals with Limited English Proficiency (LEP) attending its programs and services.

Notifying Program Beneficiaries

The VFCA will notify clients, customers, program participants, or consumers seeking to file a discrimination complaint by:

- a. Posting this process on webpage
- b. Incorporating information on how to file a complaint in program advertising materials
- c. Providing clients, customers, program participants, or consumers with the discrimination complaint process information via email upon request

Retaliation

It is against the law for the Virginia Fire Chiefs Association, Inc. to retaliate against anyone who files a discrimination complaint, takes action to oppose discrimination, files a grievance, or participates in the investigation of a complaint.

Accepting and Responding to Discrimination Complaints

The VFCA will utilize the following process for accepting and responding to discrimination complaints:

1. All discrimination complaints will be made to the VFCA Executive Director or the VFCA Professional Development Committee Chair. Email notifications can be made in writing to ceudailey@vfca.us or vfcaprofessionaldevelopment@gmail.com or verbally by calling 540.809.9397. Persons with disabilities or with limited English proficiency will be given a copy of the VFCA's *Reasonable Accommodation Guidance Process*. The respective VFCA representative will work with the complainant to meet their needs.
2. All discrimination complaints must be submitted to the VFCA no later than 180 calendar days after the alleged discrimination.
3. Once the VFCA receives a request, a VFCA representative will contact the person within 14 calendar days to acknowledge receipt of the complaint and to gather any pertinent and relevant facts related to the complaint.
4. Once the VFCA representative has a full understanding of the complaint, the VFCA representative will decide whether to conduct an internal investigation into the complaint, or whether the complaint will be referred to the appropriate external agency for investigation. Internal investigations shall be completed within 90 calendar days and external investigations will be completed within the guidelines of the respective external agency. The person filing the complaint should be notified within 30 calendar days of the VFCA acknowledging receipt the complaint as to whether the investigation will be internal or external.
5. The VFCA will notify the complainant of the findings from the internal or external investigation within 7 calendar days of the completed findings. Notifications will be made in writing.

Appeals Process

If the complainant disagrees with the findings of the internal or internal investigation, they can file a civil rights complaint with the U.S. Department of Homeland Security Office for Civil Rights and Civil Liberties (CRCL) via E-mail: CRCLCompliance@hq.dhs.gov (fastest method to submit your complaint); Fax: 202-401-4708; or U.S. Mail: U.S. Department of Homeland Security Office for Civil Rights and Civil Liberties Compliance Branch, Mail Stop #0190, 2707 Martin Luther King, Jr. Ave., SE Washington, D.C. 20528

Dual Filing of Complaints

When accepting a discrimination complaint, the VFCA should inquire whether the individual has filed a complaint with another agency, such as the CCCL, to prevent duplicative investigations. If the individual has submitted dual filings, the VFCA should contact the relevant agency to develop a coordinated approach to the investigation.

Subrecipient Procedures

Subrecipients will be provided copies of VFCA policies related to Civil Rights and Civil Liberties. If a subrecipient receives a complaint, the subrecipient shall forward all information to the VFCA and inform the complainant that they will need to file a complaint with the primary recipient (VFCA) or the CRCL. Once the VFCA receives the complaint, it will follow its internal process for handling complaints.

Record Keeping and Tracking

The VFCA will keep records in a centralized location or database to monitor:

- a. The number and type of discrimination complaints received per year.
- b. The number and type of investigations conducted.
- c. The findings and resolutions of complaints.
- d. A summary of circumstances related to each complaint.
- e. The number of investigations conducted by the CRCL related to the VFCA, if known.
- f. The number of complaints appealed to the CRCL related to the VFCA, if known.
- g. Then number and type of complaints made to or against a subrecipient.
- h. The VFCA will not collect or keep records containing personally identifiable information (PII) but only information to track discrimination complaints.