



## **Title VI and Section 504 of the Rehabilitation Act of 1973 Policy**

### **Title VI of the Civil Rights Act of 1964**

In accordance with Title VI of the Civil Rights Act of 1964, Justine Petersen Housing and Reinvestment Corporation and its affiliates, including Great Rivers Community Capital, Twenty-First Homes, LP, Twenty First Homes Developers (collectively referred to as JP), as a recipient of Federal funding, will not discriminate against any person based on age, color, creed, disability, familial status, national origin, race, religion, sex or on any other basis legally prohibited by or protected by Federal or State law. JP will not exclude anyone from participation in programs and services, or deny persons the benefits thereof, or subject anyone to discrimination on the grounds of race, color, national origin, sex, age, or disability. Questions, concerns, comments or requests for accommodation, whether from employees or clients, should be made to JP's Title VI/Section 504 (ADA) Coordinator, who is designated by the CEO.

JP will comply with Title VI of the Civil Rights Act of 1964 and all requirements imposed therein and will immediately take any measures necessary to effectuate this policy. JP will compile data, maintain records and submit reports as required to permit effective enforcement of Title VI, and permit authorized funding agency personnel during normal working hours to review and copy such records, books and accounts as needed to ascertain compliance with Title VI.

### **Section 504 (Americans with Disabilities Act)**

Pursuant to Section 504 of the Rehabilitation Act of 1973 (Section 504), the Americans with Disabilities Act of 1990 (ADA) and related federal and state laws and regulations, JP will make every effort to ensure that its facilities, programs, services, and activities are accessible to those with disabilities. JP will provide reasonable accommodation to persons with disabilities who wish to participate in public involvement events or who require special assistance to access JP facilities, programs, services or activities. Questions, concerns, comments or requests for accommodation (whether by employees or clients) should be made to JP's Title VI/Section 504 (ADA) Coordinator, who is designated as such by the CEO.

Section 504 protects individuals with disabilities, including those who:

1. Have a physical or mental impairment that substantially limits one or more major life activities.
  - **Physical impairments** include limited vision or hearing, limited mobility (including people who use wheelchairs, canes, or walkers), infectious diseases (including AIDS) and others.
  - **Mental impairments** include mental retardation, organic brain syndrome, emotional or mental illness and specific learning disabilities.
  - **Major life activities** are everyday things such as walking, talking, seeing, hearing, working or caring for oneself.

**OR**

2. Have a record of an impairment, such as a history of a disability or misclassification as having a disability.

**OR**

3. Are regarded as having an impairment. (Someone treats the person as if he/she has an impairment whether or not the person actually does.)

JP will ensure persons with disabilities who are eligible for programs and services are able to participate in and benefit from programs receiving federal financial assistance as much as people without disabilities. To that end, persons with disabilities should be able to enter and use JP facilities (or those rented/leased by JP) for delivery of programs and services. JP will provide the most integrated settings possible, in which persons with disabilities are not separated from non-disabled people, unless there is no other reasonable choice; or special services must be provided to enable the people with disabilities to participate.

JP will provide reasonable accommodation, which includes any modification or adjustment to programs and services, or program/service delivery environments, that will enable an applicant or participant to participate in JP's programs and services. Reasonable accommodation also includes adjustments to assure that an individual with a disability has rights and privileges in employment equal to those of employees without disabilities.

Any action that denies a qualified individual with equal treatment or equal opportunity to benefit from programs or activities is considered discriminatory.

1. JP uses FCC's **Telecommunications Relay Service (TRS)** upon request, which relays calls between deaf, hard of hearing or speech impaired individuals who use a TTY, Captel or VCO to communicate on the telephone. Video Relay Services (VRS) are also available, allowing consumers using American Sign Language to communicate in their native language through video interpreters. TRS numbers are communicated to the public via JP's website, standard outreach, and various client facing documentation.
2. **Conduct a self-evaluation of policies, practices and facilities.** JP has completed a self-evaluation of its physical facilities in coordination with handicapped individuals or groups. Any problems with programs, policies and procedures have been or are being addressed and resolved. The self-evaluation is periodically updated and, if needed, a Section 504 transition plan is established to make changes found necessary during the self-evaluation. modifications, if necessary, must be made within four years.

### **Grievance Procedure for Complaints Relating to Allegations of Suspected Discrimination**

Any person, employee or citizen who believes that he/she has been subjected to discrimination may personally or by a representative file a complaint with JP's Title VI/Section 504 (ADA) coordinator, Gerlinda Ralliegh, 314-533-2411 ext. 151, 1023 N Grand Blvd, Saint Louis, MO, [gralliegh@justinepetersen.org](mailto:gralliegh@justinepetersen.org). A person who has not personally been subjected to discrimination may also file a complaint.

**Step One:** An aggrieved person must submit a written statement to the Title VI/Section 504 (ADA) coordinator setting forth the nature of the discrimination alleged and facts upon which the allegation is based as soon as possible but no later than 60 calendar days after the alleged violation.

**Step Two:** The Title VI/Section 504 (ADA) coordinator shall contact the complainant no later than fifteen (15) days after receiving the written statement to establish an informal meeting with the objective of resolving the matter informally. However, in no case shall the informal meeting be conducted sooner than five (5) days or more than forty-five (45) days after receiving the written statement. There shall be prepared a written documentary of the discussions at the informal meeting, which shall be preserved in JP's records.

**Step Three:** Within fifteen (15) days of the informal meeting, if no decision has been made by Title VI/Section 504 (ADA) coordinator or the decision of the Title VI/Section 504 (ADA) coordinator does not satisfy the complainant, complainant may request a hearing with the JP President/CEO by submitting a written request to the Title VI/Section 504 (ADA) coordinator or directly to the President/CEO.

**Step Four:** In discussing the grievance, the complainant may designate any person of his/her/their choice to appear with him/her/them and participate in the discussion. JP shall issue a written decision on the matter within fifteen (15) days, and the decision shall be the final procedure for the complainant at the local level.

**Step Five:** Complainant may appeal the decision of the President/CEO and/or Title VI/Section 504 (ADA) coordinator to JP's Board of Directors. The Board shall hear the complaint and issue a written decision within 15 fifteen (15) days of the complaint.

**Step Six:** Complainant may also file a complaint with the Missouri Commission on Human Rights, 421 E. Dunklin, P.O. Box 1129, Jefferson City, MO 65102, 877-781-4236