

### *Notice of Nondiscrimination*

Southern United Neighborhoods (SUN) shall provide continuing notice that it does not discriminate on the basis of race, sex, religion, age, national origin, color, marital status, handicap, disability, political beliefs, height, weight, genetic information, or sexual orientation in any of its programs or activities. Methods of notice shall accommodate those with impaired vision or hearing. At a minimum, this notice shall be posted in a prominent place in the SUN offices or facilities. Methods of notice may also include publishing in newspapers and magazines and placing notices in SUN's publications.

Where appropriate or upon request, such notice shall be in a language or languages other than English. The notice shall identify the current Compliance Officer designated to coordinate SUN's efforts to comply with its obligations under 40 CFR, Part 7. The text of the notice to be provided under this policy shall read as follows:

It is the policy of Southern United Neighborhoods not to discriminate on the basis of race, sex, religion, age, national origin, color, marital status, handicap, disability, political beliefs, height, weight, genetic information, or sexual orientation. In compliance with Title 40 of the Code of Federal Regulations (CFR), Part 7, SUN has adopted an internal grievance procedure providing for prompt and equitable resolution of complaints alleging a violation of 40 CFR, Part 7.

The SUN Director has designated a Compliance Officer to monitor compliance with this policy.

### *Grievance Procedures*

Southern United Neighborhoods (SUN) adopts the following grievance procedures in order to assure the prompt and fair resolution of complaints that allege a violation by SUN of 40 CFR, Part 7:

#### **Step 1: Submittal of Complaint:**

In order to have a complaint submittal considered for investigation under this procedure, the complainant shall file the complaint no later than 180 calendar days after the date(s) of the alleged act(s) of discrimination.

The complaint shall be in writing and signed by the complainant or the complainant's representative and shall include contact information for the complainant or their representative.

The complaint shall specify with as much detail as possible:

- The actions or inactions by SUN that support an alleged violation of 40 CFR, Part 7;
- The alleged discrimination that did or will result from such actions or inactions;
- The identity of the person(s) harmed or potentially harmed by the alleged discrimination; and

- The section of 40 CFR, Part 7, that SUN allegedly violated.

SUN may request additional information from the complainant if needed to assist with meeting the complaint requirements listed above. Appropriate assistance shall be provided to individuals with disabilities and individuals with limited English proficiency. Also, complaints in alternate formats shall be accepted from individuals with disabilities, for example, complaints filed on computer disks, on audio tape, or in Braille.

All complaint submittals should be mailed (or e-mailed) to the Compliance Officer at the following address:

Rev. Richard Bell, Compliance Officer  
Southern United Neighborhoods  
2221 St. Claude Avenue  
New Orleans, LA 70117  
E-mail: Richard.Bell@cox.net

#### Step 2: Logging of Complaint Submittals:

All complaint submittals are to be logged. Compliance Officer shall retain a copy of all documents on file in accordance with the records retention schedule. Compliance Officer shall also notify the relevant program manager(s).

The following are examples of what will not be logged as a complaint submittal:

- Anonymous submittals;
- Submittals too vague to reasonably determine the allegations of discriminatory conduct;
- Submittals not sufficiently identifying the person(s) harmed or potentially harmed by the alleged discrimination;
- Inquiries seeking advice or information;
- Courtesy copies of court pleadings;
- Courtesy copies of complaints addressed to other local, state, or federal agencies;
- Newspaper articles;
- Web-based media sources such as YouTube videos, e-mail strings, blogposts, comments strings, or Web pages;
- Courtesy copies of internal grievances; and
- Voice mail messages, phone calls, or in-person conversations.

#### 3. Initial Review of Complaint Submittals:

Upon receipt of a complaint and any additional information supporting or otherwise associated with the complaint, a case file shall be established containing all documents and information pertaining to the complaint and an initial review of the case shall be conducted.

4. Determination if Complaint Warrants Further Investigation: Compliance Officer, based on information in the complaint submittal and other information available, shall determine if:

- SUN has jurisdiction to pursue the matter; and
- The complaint submittal contains sufficient merit to warrant further investigation.

A complaint shall warrant further investigation unless:

- It clearly appears on its face to be frivolous or trivial;
- Within the time allotted for making the determination of jurisdiction and investigative merit, SUN reaches an agreed resolution with the complainant;
- Within the time allotted for making the determination of jurisdiction and investigative merit, the complainant withdraws the complaint; or
- The complaint was not submitted within the time limit established in Step 1.

Within 14 calendar days of receipt of the complaint submittal, Compliance Officer shall inform the complainant if the complaint has or has not been accepted for further investigation. If it is determined that further investigation is not warranted, the reason for such determination shall be recorded in the case file.

5. Further Investigation of Complaint: If Compliance Officer determines the complaint submittal warrants further investigation, the Board shall review the alleged facts to determine the course of the investigation. The investigation may include interviews of SUN employees, other relevant witnesses, or others named in the complaint. SUN employees shall make themselves available as necessary.

6. Report and Determination: Compliance Officer shall issue a report and determination on whether the DEQ violated 40 CFR, Part 7. Compliance Officer shall prepare a written report of the investigation that shall include a narrative of the incident, an identification of individuals interviewed and evidence reviewed, and findings and a determination. The report and determination shall be placed in the complaint file.

Within 180 calendar days of receiving the complaint that warranted investigation, the Compliance Officer notify the complainant in writing of the findings of the investigation and the recommendations for resolution.

7. Appeal:

The person submitting the complaint may appeal the decision of the Compliance Officer by writing to the Director & Executive Board within 30 calendar days of receiving the Compliance Officer's decision. The Director shall issue a written decision in response to the appeal no later than 30 calendar days after its filing.