



## Front and Centered Non-Discrimination Grievance Policy and Procedures

*Last revised: June 18, 2025*

### **Introduction**

Title 40 of the Code of Federal Regulations (C.F.R.), Parts 5 and 7, Nondiscrimination in Programs or Activities Receiving Federal Assistance from the Environmental Protection Agency, prohibits discrimination on the basis of race, color, national origin (including limited English proficiency), age, sex, or disability in programs or activities receiving financial assistance from the U.S. Environmental Protection Agency (U.S. EPA). It requires recipients of financial assistance from the U.S. EPA to: A. Designate a person to be the Nondiscrimination Coordinator to coordinate efforts to comply with 40 C.F.R., Parts 5 and 7; B. Collect, maintain, and provide information showing compliance with 40 C.F.R., Parts 5 and 7; C. Adopt grievance procedures that assure the prompt and fair resolution of discrimination complaints alleging violations of 40 C.F.R., Parts 5 and 7; and D. Provide continuing and prominent public notice of nondiscrimination on the basis of race, color, national origin, age, sex, or disability, and of the identity and contact information for the Nondiscrimination Coordinator.

As set forth below, it is Front and Centered policy not to discriminate on the basis of several factors, including those in 40 C.F.R., Parts 5 and 7. For definitions of terms, please refer to “Definitions” in Section 7.25 of subpart A in 40 C.F.R., Part 7 and Section 5.105 of Subpart A, in 40 C.F.R. Part 5. In addition, Front and Centered adopts the following procedures to implement the requirements of 40 C.F.R., Parts 5 and 7.

### **Policy**

Front and Centered does not discriminate on the basis of race, color, national origin, age, sex, disability, sexual orientation, or marital status in administration of its programs or activities, and, Front and Centered does not intimidate or retaliate against any individual or group because they have exercised rights protected by 40 C.F.R. Parts 5 and 7 or for the purpose of interfering with such rights. Front and

Centered is responsible for coordination of compliance efforts and receipt of inquiries concerning nondiscrimination requirements implemented by 40 C.F.R. Parts 5 and 7 (Non-Discrimination in Programs or Activities Receiving Federal Assistance from the Environmental Protection Agency), including Title VI of the Civil Rights Act of 1964, as amended; Section 504 of the Rehabilitation Act of 1973; the Age Discrimination Act of 1975, Title IX of the Education Amendments of 1972; and Section 13 of the Federal Water Pollution Control Act Amendments of 1972.

#### A. Nondiscrimination Coordinators

Front and Centered's Executive Director designated the following Nondiscrimination Coordinator on June 18, 2025:

Melina Rivera  
Operations Director  
[melina@frontandcentered.org](mailto:melina@frontandcentered.org)

#### B. Compliance Information

1. Front and Centered shall collect, maintain, and on request of the U.S. EPA, External Civil Rights Compliance Office within the Office of General Counsel (ECRCO), provide the following information to show compliance with 40 C.F.R., Parts 5 and 7:
  - a. A brief description of any lawsuits pending against Front and Centered that allege discrimination which 40 C.F.R., Parts 5 and 7, prohibits;
  - b. Racial/ethnic, national origin, age, sex, disability, and disability data, or EPA Form 4700-4 information submitted with Front and Centered applications for U.S. EPA financial assistance;
  - c. A log of discrimination complaints that identifies the complaint, the date it was filed, the date Front and Centered's investigation was completed, the disposition, and the date of disposition;
  - d. Reports of any compliance reviews conducted by any other agencies; and
  - e. Data and information specific to certain Front and Centered programs or activities to determine compliance where there is reason to believe that discrimination may exist in a Front and Centered program or activity or to investigate a complaint alleging discrimination in a Front and Centered program or activity.
2. When preparing compliance information, Front and Centered shall use the racial classifications set forth in 40 C.F.R., Section 7.25, in determining categories of race, color, or national origin;

3. Front and Centered shall keep records of the compliance information identified in paragraphs (1)(a) through (1)(e), above, for at least three (3) years after completing a project for which Front and Centered was a recipient of U.S. EPA financial assistance. When any complaint or other action for alleged failure by Front and Centered to comply with 40 C.F.R., Parts 5 and 7, is brought before the three-year period ends, Front and Centered shall keep records until the complaint is resolved; and
4. Front and Centered shall:
  - a. Give ECRCO access during normal business hours to its books, records, accounts, and other sources of information, including its facilities, as may be pertinent to 40 C.F.R., Parts 5 and 7;
  - b. Make compliance information available to the public upon request; and
  - c. Assist in obtaining other required information that is in the possession of other agencies, institutions, or persons not under Front and Centered's control. If such party refuses to release that information, Front and Centered shall inform the ECRCO and explain its efforts to obtain the information.

### C. Grievance Procedure

Any person who believes someone has been subjected to discrimination may file a grievance under this procedure by contacting the Non-Discrimination Coordinator. It is against the law for Front and Centered to retaliate against any person or group because they have exercised rights protected by 40 C.F.R. Parts 5 and 7 or for the purpose of interfering with any such rights. Front and Centered adopts the following grievance procedures in order to assure the prompt and fair resolution of complaints that allege a violation by Front and Centered of 40 C.F.R., Parts 5 and 7:

1. Grievances must be submitted to the Front and Centered Non-Discrimination Coordinator within 90 days of the date the person filing the grievance becomes aware of the alleged discriminatory action. Grievance submissions, in the preferred language of the complainant, can be emailed to [melina@frontandcentered.org](mailto:melina@frontandcentered.org), called in through the office number at 206-487-4303, or mailed to the Front and Centered office address listed below:

2800 1st Avenue, Suite 201  
Seattle, WA 98121
2. A complaint must be in writing, containing the name and address of the person filing it and/or the identified representative. The complaint must state the date of the occurrence and the problem or action alleged to be

discriminatory and the remedy or relief sought. The complaint shall specify with as much detail as possible:

- a. The actions or inactions by Front and Centered that support an alleged violation of 40 C.F.R., Parts 5 and 7;
  - b. 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
  - c. The basis for why the action is believed to be discriminatory, and if possible, identifying the sections of 40 C.F.R., Parts 5 and 7, that were allegedly violated.
3. The Front and Centered Non-Discrimination Coordinator (or their designee) will acknowledge receipt of the grievance within 5 days and shall conduct an investigation of the complaint. This investigation may be informal, but it will be thorough, affording all interested persons an opportunity to submit evidence relevant to the complaint. The Front and Centered Non-Discrimination Coordinator will maintain the files and records of Front and Centered relating to such grievances. To the extent possible, and in accordance with applicable law, the Front and Centered Non-Discrimination Coordinator will take appropriate steps to preserve the confidentiality of files and records relating to grievances and will share them only with those who have a need to know.
- a. Front and Centered's Non-Discrimination Coordinator is responsible for making information available to non-employees regarding rights to services, aids, benefits, and participation without regard to race, color, national origin, age, sex, disability, sexual orientation, or marital status. Front and Centered's Non-Discrimination Coordinator will periodically evaluate the effectiveness of Front and Centered's efforts to offer such services, aids, benefits and participation opportunities when feasible.
  - b. Front and Centered's Non-Discrimination Coordinator is responsible for ensuring that intimidation and retaliation against any person or group because they have exercised rights protected by 40 C.F.R., Parts 5 and 7, or for the purpose of interfering with any such rights, is prohibited and that claims of intimidation and retaliation will be handled promptly if they occur.
  - c. Front and Centered's Non-Discrimination Coordinator will coordinate or facilitate training efforts for Front and Centered staff regarding the Department's obligations to comply with non-discrimination statutes, and policies and procedures.
  - d. Front and Centered's Non-Discrimination Coordinator will track all complaints filed against Front and Centered under this policy or with the EPA and shall review all complaints on a semi-annual basis to identify and address any patterns or systemic problems. Front and

Centered's Non-Discrimination Coordinator will also ensure that complainants are updated on the progress of their discrimination complaints filed with Front and Centered, if requested. Front and Centered's Non-Discrimination Coordinator will promptly inform the complainant as to any determinations made.

- e. Front and Centered's Non-Discrimination Coordinator is responsible for providing notice of this policy and carrying out the process, as prescribed by this policy, of the investigation of non-employee complaints. Front and Centered's Non-Discrimination Coordinator may delegate an investigation to another investigator or designee, if necessary, on a case-by-case basis.
4. The Front and Centered Non-Discrimination Coordinator will issue a written decision on the grievance, based on a preponderance of the evidence, no later than 30 days after its filing, including a notice to the complainant of their right to pursue further administrative or legal remedies. The written decision will include whether discrimination is found and the description of the investigation process.
5. Front and Centered assures that intimidation and retaliation are prohibited and that claims of intimidation and retaliation will be handled promptly and fairly pursuant to the Front and Centered Non-discrimination Grievance Policy and Procedures in the same manner as other claims of discrimination.
6. The person filing the grievance may appeal the decision of the Front and Centered Non-Discrimination Coordinator by writing to the Front and Centered Board of Directors within 15 days of receiving the Front and Centered Non-Discrimination Coordinator's decision. The Front and Centered Board of Directors shall issue a written decision in response to the appeal no later than 60 days after its filing.
7. The availability and use of this grievance procedure does not prevent a person from pursuing other legal or administrative remedies, including filing a complaint of discrimination on the basis of race, color, national origin, disability, age, sex or retaliation, in court or with the U.S. Environmental Protection Agency, External Civil Rights Compliance Office. A person can file a complaint of discrimination electronically by writing to TitleVI [Complaints@epa.gov](mailto:Complaints@epa.gov) or by mail or phone at:

U.S. EPA External Civil Rights Compliance Office  
Office of General Counsel (Mail Code 2310A)  
1200 Pennsylvania Avenue N.W., Washington, D.C. 20460  
PHONE: (202) 564-3316

The availability and use of this grievance procedure does not prevent a person from filing a complaint of discrimination on the basis of race, color,

national origin, disability, age, sex, sexual orientation, or marital status with the state of Washington. Complaints of discrimination or retaliation on the basis of these classes can be filed electronically with the Department of Labor and Industries (L&I) or by mail to:

Civil Rights Program at L&I  
2111 N Northgate Way, Suite 300  
Seattle, WA 98133

Front and Centered will make appropriate arrangements to ensure that individuals with disabilities and individuals with limited English proficiency are provided auxiliary aids and services or language assistance services, respectively, if needed, to participate in this grievance process. Such arrangements may include, but are not limited to, providing qualified interpreters, providing taped cassettes of material for individuals with low vision, or assuring a barrier-free location for the proceedings. The Front and Centered Non-Discrimination Coordinator will be responsible for such arrangements.

#### D. Notice of Nondiscrimination

Front and Centered shall provide continuing notice that it does not discriminate on the basis of race, color, national origin, age, sex, disability, sexual orientation, or marital status 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 Front and Centered's offices or facilities and on Front and Centered's internet homepage. Methods of notice may also include publishing in newspapers and magazines and placing notices in Front and Centered'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 Front and Centered Nondiscrimination Coordinator as the responsible Front and Centered employee designated to coordinate Front and Centered's efforts to comply with its obligations under 40 C.F.R., Parts 5 and 7. The text of the notice to be provided under this policy shall read as follows:

It is the policy of Front and Centered to not discriminate on the basis of race, color, national origin, age, sex, disability, sexual orientation, or marital status in administration of its programs or activities, and, Front and Centered does not intimidate or retaliate against any individual or group because they have exercised rights protected by 40 C.F.R. Parts 5 and 7 or for the purpose of interfering with such rights.

Front and Centered is responsible for coordination of compliance efforts and receipt of inquiries concerning non-discrimination requirements implanted by 40 C.F.R. Parts 5 and 7 (Non-discrimination in Programs or Activities Receiving Federal Assistance from the Environmental Protection Agency), including Title VI of the Civil Rights Act of 1964, as amended; Section 504 of the Rehabilitation Act of 1973, the Age Discrimination Act of 1975, Title XI of the Education Amendments of 1973, and Section 13 of the Federal Water Pollution Control Act Amendments of 1972 (hereinafter referred to collectively as the federal non-discrimination statutes).

If you have any questions about this notice or any of Front and Centered's non-discrimination programs, policies or procedures, you may contact:

Front and Centered Non-discrimination Coordinator  
[melina@frontandcentered.org](mailto:melina@frontandcentered.org)  
2800 1st Avenue, Suite 201  
Seattle, WA 98121  
415-543-6771

Front and Centered's Non-discrimination Policy and Procedures are reviewed on an annual basis, and revised as necessary, to ensure prompt and fair resolution of discrimination complaints.

**June 18, 2025**

Aurora Martin  
Executive Director