



I. Non-Discrimination Policy Statement

It is the policy of Community Action of Skagit County (Community Action) that no person shall on the grounds of race, color, national origin, sex, disability, or age, be excluded from participation in, be denied the benefits of, or be subjected to discrimination in any operation of Community Action as provided by Title VI of the Civil Rights Act of 1964 and related statutes.

This policy applies to all operations of Community Action, including its contractors and anyone who acts on behalf of Community Action. This policy also applies to the operations of any department or agency to which Community Action extends federal financial assistance. Federal financial assistance includes grants, training, and use of equipment, donations of surplus property, and other assistance.

Prohibited discrimination may be intentional or unintentional. Seemingly neutral acts that have disparate impacts on individuals of a protected group and lack a substantial legitimate justification are a form of prohibited discrimination. Harassment and retaliation are also prohibited forms of discrimination.

Examples of prohibited types of discrimination based on race, color, national origin, sex, disability, or age include: Denial to an individual any service, financial aid, or other benefit; Distinctions in the quality, quantity, or manner in which a benefit is provided; Segregation or separate treatment; Restriction in the enjoyment of any advantages, privileges, or other benefits provided; Discrimination in any activities related to highway and infrastructure or facility built or repaired; and Discrimination in employment.

Title VI compliance is a condition of receipt of federal funds. The Title VI Coordinator is authorized to ensure compliance with this policy, Title VI of the Civil Rights Act of 1964, 42 U.S.C § 2000d and related statutes, and the requirements of 23 Code of Federal Regulation (CFR) pt. 200 and 49 CFR pt. 21.

A handwritten signature in blue ink that reads "William B. Henkel".

William B. Henkel, Executive Director

A handwritten date in blue ink that reads "11/20/2020".

Date



II. Organization, Staffing, and Structure

William Henkel, Executive Director, is ultimately responsible for assuring full compliance with the provisions of Title VI of the Civil Rights Act of 1964 and related statutes and has directed that non-discrimination is required of all agency employees, contractors, and agents pursuant to 23 CFR Part 200 and 49 CFR Part 21.

The HR & Administration Manager will perform the duties of the Title VI Coordinator and ensure implementation of agency's Title VI program. The position of HR & Administration Manager is located within Administration.

The Title VI Coordinator is responsible for:

- Submitting a Title VI plan and annual reports on the agency's behalf;
- Developing procedures for the prompt processing and disposition of complaints;
- Investigating complaints, compiling a complaint log, and reporting to CDOT.
- Developing procedures for the collection and analysis of statistical data.
- Developing a program to conduct Title VI reviews of program areas;
- Conducting annual Title VI assessments of pertinent program areas;
- Developing Title VI information for dissemination;
- Establishing procedures for resolving deficiency status and reducing to writing the remedial action agreed to be necessary.

See attached organizational charts.



III. Primary Program Area Descriptions & Review Procedures

Community Action engages in the following program areas all for the benefit of community members with limited resources:

Program Area	General Description	Title VI/Non-Discrimination Concerns and Responsibilities	Review Procedures for Ensuring Non-Discrimination
Resource Center	Assists low-income community members with resource referrals and stabilizing services such as SNAP and transportation.		Customer surveys, staff training, system review, customer input
Housing Resource Center	Provides intake and housing referrals for HUD eligible homeless persons in Skagit County.		Customer surveys, staff training, system review, customer input
Energy Program	Intake and financial assistance to cover heating & electric costs.		Customer surveys, staff training, system review, customer input
Employment Program	Assistance with work experience, job search and life skills.		Customer surveys, staff training, system review, customer input
Legal Program	Civil Legal Aid provided by referrals to local attorneys providing pro bono services.		Customer surveys, staff training, system review, customer input
WIC Program	Nutrition assistance for pregnant women, breastfeeding women, infants, and children to age 5.		Customer surveys, staff training, system review, customer input
Education	Quality, goal-based educational		Customer surveys, staff training,



Programs	services including English Language acquisition and GED preparation.		system review, customer input
Volunteer Center	Intake and referral to volunteer opportunities for community members.		Customer surveys, staff training, system review, customer input
Sr. & Disabled Program	Coordination of community volunteers to provide direct services for elderly and disabled adults		Customer surveys, staff training, system review, customer input
East County Resource Center	Multi-service center providing agency programs		Customer surveys, staff training, system review, customer input
Family Development Center	10 apartment units located in Mount Vernon, where homeless families may stay for up to 60 days		Customer surveys, staff training, system review, customer input
Food Distribution Center	Distribution hub for Skagit food banks and hot meal programs.		Customer surveys, staff training, system review, customer input
Behavioral Health Ombuds	Ombuds mission is to assist individuals who are applying, receiving, or been denied behavioral health services		Customer surveys, staff training, system review, customer input



IV. Title VI Complaint Procedures

Community Action publishes Title VI compliance information on all brochures, the website and in main reception areas. Brochures are available in English and Spanish. Complaint procedures are available in English, Spanish, and Russian.

Discrimination Complaint Procedure for Community Action

Federal law prohibits discrimination on the basis of race, color, national origin, age, sex, or disability in any Community Action program or activity. This prohibition applies to all branches of Community Action its contractors, consultants, and anyone else who acts on behalf of Community Action.

Federal law requires that Community Action investigate, track, and report discrimination complaints. Complaints must be filed in writing and will be investigated within sixty days of submission. If you need assistance to file your complaint or need interpretation services, please contact Title VI Coordinator / HR & Administration Manager.

Non-Retaliation; under no circumstances will an employee be penalized for reporting what the employee believes in good faith to be harassment under this policy. If you believe that you are being retaliated against for bring a complaint of harassment or discrimination, you should report such conduct immediately to your direct supervisor or to the Human Resources Department. Any employee, supervisor or manager who retaliates against an employee for making a complaint shall be subject to disciplinary action up to and including termination”

Who is eligible to file a complaint?

Anyone who believes they have been excluded from participation in, denied the benefits of, or otherwise subjected to discrimination under any Community Action program or activity because of their race, color, national origin, age, sex, or disability may file a complaint.

Discrimination includes lack of access, harassment, retaliation and disparate impacts from a program or activity. Harassment includes a wide range of abusive and humiliating verbal or physical behaviors. Retaliation includes intimidating, threatening, coercing, or engaging in other discriminatory conduct against anyone because they filed a complaint or otherwise participated a discrimination investigation.

How do you file a complaint?



Complaints must be filed in writing within 180 days from the last date of the alleged discrimination. However, contact Title VI Coordinator / HR & Administration Manager if you believe your complaint may fall outside this deadline.

Reasonable efforts will be made to assist persons with disabilities, non-English speakers, and others unable to file a written complaint. For assistance in filing a complaint, please contact Title VI Coordinator / HR & Administration Manager

Complaints may be submitted via mail, email, fax or in person to:

Title VI Coordinator, HR and Administration Manager
Community Action of Skagit County
330 Pacific Place
Mount Vernon, WA 98273
[mindye@communityactionskagit.org](mailto:mindy@communityactionskagit.org)
FAX 360-416-7599

What happens after a complaint is filed?

Title VI complaints must be investigated within sixty days. Investigating a complaint includes interviewing all parties involved and key witnesses. The investigator may also request relevant information such as books, records, electronic information, and other sources of information from all involved parties. You may specify if there is a particular individual or individuals that you feel should not investigate your complaint due to conflict of interest or other reasons.

Federal law prohibits retaliation or harassment against individuals because they have filed a discrimination complaint or otherwise participated in a discrimination investigation. Any alleged retaliation should be reported in writing to the investigator. Community Action will take immediate action to stop the conduct, which may include a temporary suspension of the accused while the investigation is being conducted to protect confidentiality or evidence tampering. Once the investigation is complete, Community Action will take action in accordance with the findings of the investigation. This may result in suspension or termination of accused employee.



V. Title VI / ADA Complaint Form

Please complete this form to the best of your ability. If you need translation or other assistance, contact _____.

Name _____

Address _____ City _____ Zip _____

Phone: Home _____ Work _____ Mobile _____

Email: _____

Basis of Complaint (circle all that apply):

Race	Color
National Origin	Sex/Gender
Age	Disability
Retaliation	Other:

Who discriminated against you?

Name _____

Name of Organization _____

Address _____ City _____ Zip _____

Telephone _____

How were you discriminated against? (Attach additional pages if more space is needed)



Where did the discrimination occur?

Dates and times discrimination occurred?

Were there any other witnesses to the discrimination?

Name	Organization/Title	Work Telephone	Home Telephone

How would you like to see this situation resolved?

Have you filed your complaint, grievance, or lawsuit with any other agency or court?

Who _____ When _____
 Status (pending, resolved, etc.) _____ Result, if known _____
 Complaint number, if known _____

Do you have an attorney in this matter?

Name _____ Phone _____
 Address _____ City _____ Zip _____

Signed _____ Date _____



VII. Data Collection

All Community Action programs request a basic agency intake form that records race, ethnicity, sex and other basic demographic data. This data is entered into the agency data base. Data is reviewed quarterly and published annually in a public report. Individual programs also record this data as applicable in multiple funder specific data bases. Several funding sources require quarterly reports that include demographic data and most require at least an annual report or application that includes demographic data.

VIII. Public Participation

Agency processes for conducting public outreach.

- **Identification of minority populations for outreach**
Minority populations for service outreach are identified from census data, community needs assessment, other agency needs assessments and community demographic reports, in addition to engagement in community groups.
- **Communication with and outreach to minority populations**
Staff participates in radio interviews during Spanish language shows on KSVR. Ticker tape ads are run on Channel 26, the City of Mount Vernon's Spanish access TV. Posters and door hangers are placed in low-income apartment complexes and businesses that minority populations might frequent, including local foodbanks. Spanish/English announcements are made on the electronic reader board in front of the office. Information is distributed through the Skagit County Resource Coalition to over 45 local non-profit partners.
- **Communication with and outreach to Limited English Proficient individuals**
Over 50% of the population using Community Action services identify as native Spanish speakers. We also have participants who speak Russian and the indigenous languages of Mexico. We have bi-cultural and bi-lingual staff serving in key customer contact positions. In order to better understand the needs of the Hispanic community, Community Action convened and meets monthly with a Latina/o Advisory Committee.
- **Agency consideration of input from minority populations for decision making in pertinent program areas.**
Community Action does a community wide needs assessment every three years that is specifically targeted at households living at or below the Federal Poverty Level. This 13



page questionnaire is professionally analyzed and data is used to evaluate community needs and the appropriateness of agency programs. Specific focus groups are held with identified minority populations within the community to enhance input to the assessment. The assessment is disseminated widely via other social service contacts within the community and is also available on-line.



IX. Notice of Rights

Community Action publishes Title VI notice of rights on all brochures, the website and in main reception areas in English and Spanish.

Your Rights Against Discrimination under Title VI of the Civil Rights Act of 1964

Community Action operates its programs and services without regard to race, color, national origin, sex, age, and disability. Anyone who believes they have been excluded from participation in, denied the benefits of, or otherwise subjected to discrimination under any Community Action program or activity because of their race, color, national origin, age, sex, or disability may file a discrimination complaint with Community Action or the Washington State Human Rights Commission.

To file a Title VI discrimination complaint, contact:

Title VI Coordinator / HR and Administration Manager

Community Action of Skagit County
330 Pacific Place
Mount Vernon, WA 98273
mindy@communityactionskagit.org
FAX 360-416-7599

Washington State Human Rights Commission

TI-Free: +1-800-233-3247
Olympia Headquarters
711 S. Capitol Way, Suite 402
Olympia, WA 98504
<https://www.hum.wa.gov/>