



Policy on Civil Rights *Adopted September 2024*

Overview

The National Volunteer Fire Council, Inc. (NVFC) complies 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 language)
- **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**
- **DHS Regulations 6 C.F.R. Part 19** which prohibits discrimination based on **religion** in social service programs.

It is against the law for NVFC to retaliate against anyone who takes action to oppose discrimination, files a grievance, or participates in the investigation of a grievance in accordance with the above authorities.

Key Points

- This policy applies to applicants and Workforce Members of the National Volunteer Fire Council (NVFC). Workforce Members include employees, providers, volunteers, trainees, subrecipients, and other persons whose conduct, in the performance of work for NVFC, is under the direct control of such entity, whether or not they are paid by NVFC.
- This policy provides information regarding NVFC's commitment to equal employment opportunity (EEO), non-discrimination, and non-retaliation, including how to report concerns.
- NVFC takes concerns involving potential discrimination seriously. NVFC investigates and takes appropriate remedial action to address violations.

Designated Staff

The HR Administrator (primary) along with the CEO and COO are designated to coordinate and carry out the responsibilities for compliance with this policy. In this role, they are responsible for processing complaints filed by the public, responding to requests for reasonable accommodations, coordinating the translation of documents, and other related duties. However, it is the responsibility and expectation that all Workforce Members of the NVFC to abide by NVFC policy.

Non-Discrimination and Equal Opportunity

NVFC is committed to maintaining non-discriminatory policies, practices, and treatment in all aspects of

employment, to program beneficiaries, and to the public.

If you need reasonable accommodation, please contact Meg Goldberg, HR Administrator at meg@nvfc.org or 202-887-5700. Please see the attached FAQs about reasonable accommodation.

The NVFC may contact you to obtain more information about your request and to better understand your needs. In addition, NVFC may review your request to determine whether the requested accommodation will be effective in allowing you participate in the activity or program in which you are seeking participating; whether the requested accommodation is reasonable, or an equally effective alternative to the requested accommodation is available; and whether providing you with the requested accommodation would fundamentally alter the nature of NVFC's program or impose undue financial or administrative burdens on NVFC.

The NVFC also meets requirements to take reasonable steps to provide meaningful access to the organizations' program and services (not limited to the funded program(s) to individuals with limited English proficiency. This includes the following resources:

1. About 8% of the American population or 25 million people over the age of 5 have limited English proficiency. Typically only individuals 16 and older are targeted by our programming so the number eligible for our service is less than 25 million.
2. Methods to provide language assistance:
 - a. Bilingual Staffing: when feasible, NVFC hires staff who is bilingual
 - b. Provides Free Aids and Services: such as qualified sign language interpreters and written information in other formats (large print, audio, accessible electronic formats, etc.) to community effectively with persons with disabilities.
 - c. Qualified Interpreter Services: NVFC will provide an interpreter to an individual with limited-English-proficiency (LEP) if the individual requests language assistance, or it is evident that such assistance is needed. LEP persons will be advised that they may secure the assistance of an interpreter of their own choosing, if they wish, at their own expense
 - d. Written Communications: NVFC implemented a service that translates the NVFC website and web site content to multiple languages. The NVFC currently provides some materials in Spanish.
3. Notification to LEP persons of the availability of free language services is provided when LEP persons request services through the process described above.

Execution of the commitments in this plan will depend on the level of NVFC resources and the relative costs that would be imposed on the Council.

Reporting and Investigating Concerns of Potential Discrimination:

Individuals with concerns involving potential discrimination based on a protected characteristic(s) should write a letter addressed to the National Volunteer Fire Council and provide in the letter all information relating to the alleged complaint including details about all relevant dates, events, and facts, identify all individuals involved and any witnesses, and explain why the individual believes that discrimination may be involved. Submit your completed letter to the NVFC by mail at the address in below in the "File a Complaint" section of this document.

Persons with disabilities who require alternative means of communication for program, service or complaining filing information (e.g. Braille, large print, audiotape, American Sign Language, etc.) should contact NVFC's HR Administrator using the contact information below. Additionally, program, service and compliant filing information may be made available in languages other than English.

NVFC accepts and responds to complaints of discrimination from program beneficiaries that are filed no later than 180 days after the date of the alleged discrimination. The HR Administrator, Meg Goldberg, is designated to provide the complainants with written acknowledgement of the complaint within 10 business days of receipt. Correspondence with the complainant will be by email, unless the complainant specifies another preferred method to correspond in writing.

NVFC will investigate and resolve complaints, either internally or externally within 5 months of receipt, or will refer the complainant to another agency/agencies within 14 days of receipt. NVFC will maintain a complaint log to track all complaints received and the status of each complaint.

To File a Complaint:

If you think that the National Volunteer Fire Council has failed to provide these services or discriminated in another way based on race, color, national origin (including language), disability, sex, age, or religion, you can file a complaint with Meg Goldberg, HR Administrator:

Email: meg@nvfc.org

Phone: 202-887-5700

Mail: National Volunteer Fire Council
712 H Street NE, Suite 1478
Washington, DC. 20002.

You can also file a civil rights complaint with the U.S. Department of Homeland Security Office for Civil Rights and Civil Liberties (CRCL):

Email: CRCLCompliance@hq.dhs.gov (fastest method to submit your complaint)

Fax: 202-401-4708

US. Mail: U.S. Department of Homeland Security
Office for Civil Rights and Civil Liberties Compliant Branch
Mail Stop #0190
2707 Martin Luther King, Jr. Ave., SE
Washington, D.C. 20528

For additional information: www.dhs.gov/crcl | Phone: 202-401-1474. | Toll-Free. 866-644-8360

Frequently Asked Questions (FAQ) about Reasonable Accommodations for Individuals with Disabilities

The National Volunteer Fire Council (NVFC) is committed to providing individuals an equal opportunity to participate in and benefit from NVFC's programs, activities, and services.

Individuals may request reasonable accommodations from NVFC that they believe will enable them to have such equal opportunity to participate in our programs, activities, and services.

To request reasonable accommodation, contact Meg Goldberg, HR Administrator at meg@nvfc.org or 202-887-5700.

The following FAQ provides information on requesting reasonable accommodations in NVFC's programs and activities:

1. What is reasonable accommodation in NVFC's programs/activities?

A reasonable accommodation is a change or modification to afford a qualified individual with a disability full enjoyment of NVFC's programs or activities, unless modifications of policies, practices, and procedures would fundamentally alter the nature of the program, service or activity, or result in undue financial and administration burdens to NVFC.

2. Does my request for a reasonable accommodation need to be in writing?

No, you do not need to put your request in writing, however, making a written request can be helpful documentation for ensuring that NVFC provides the desired accommodation. In addition, you do not need to use the specific words "reasonable accommodation" when making your request.

3. When should I request a reasonable accommodation?

You may request a reasonable accommodation from NVFC at any time. However, making the advance of a meeting, conference call, or other activity will help ensure NVFC is able to fulfill the request for an accommodation. For certain requests, such as request for sign language interpretation, NVFC requests at least two week's advance notice.

4. May someone request a reasonable accommodation on my behalf?

Yes, anyone can request a reasonable accommodation on behalf of an individual with a disability to seeks to interact with NVFC staff or participate in its programs or activities.

5. What will NVFC do upon receiving my request for a reasonable accommodation.

NVFC may contact you to obtain more information about your request and to better understand your needs. In addition, NVFC may review your request to determine:

- Whether the requested accommodation will be effective in allowing you to participate in the activity or program in which you are seeking participation;
- Whether the requested accommodation is reasonable, or an equally effective alternative to the requested accommodation is available; and

- Whether providing you with the requested accommodation would fundamentally alter the nature of NVFC's program or impose undue financial or administration burdens on NVFC.

In addition, in some cases NVFC may consult with you in an interactive process to determine on a case-by-case basis what accommodations can be made.

If NVFC determines that your requested accommodation would fundamentally alter the nature of the program or impose an undue financial or administrative burden, NVFC may deny your request. However, in the unlikely event that this occurs, NVFC will work with you to identify an alternative accommodation that allows you to effectively participate in NVFC's program, activity, or service.

6. May NVFC request medical documentation from you after receiving your request for a reasonable accommodation?

No, NVFC may not request medical documentation after receiving your request for a reasonable accommodation. NVFC's questions will be limited to understanding the barrier to your ability to participate in the program or activity in which you are interested and the nature of an accommodation that will remove this barrier.

7. May NVFC charge you the cost of providing the reasonable accommodation?

No, you are not responsible for the cost of an auxiliary aid or service NVFC provides you.

8. What are some examples of reasonable accommodations?

There are many types of reasonable accommodations. Some examples of how NVFC provides reasonable accommodations include:

- Arranging for qualified sign language interpreters
- Providing on-site captioning
- Producing alternate formats of print materials in braille, large print, or in an electronic format
- Providing remote conference captioning services
- Furnishing a temporary ramp to access the dais or other areas with one or more stairs to ensure accessibility for individuals who have a physical disabilities and may be using a wheelchair or walker