
Worcester County, Maryland – Civil Rights Grievance Procedure

- **Effective Date:** 9/16/25

Authority:

40 C.F.R. Parts 5 and 7, 42 U.S.C. 2000d to 2000d-7 and 6101 et seq.; 29 U.S.C. 794; 33 U.S.C. 1251nt. generally applies to Nondiscrimination in Programs or Activities Receiving Federal Assistance from the Environmental Protection Agency, including:

Title VI of the Civil Rights Act of 1964, as amended (42 U.S.C. §2000d to 2000d-7), which prohibits recipients of federal financial assistance from discriminating on the basis of race, color, or national origin (including limited English proficiency) in their programs or activities. Title VI itself prohibits intentional discrimination.

Section 504 of the Rehabilitation Act of 1973, which prohibits discrimination on the basis of disability in federally-assisted programs or activities;

Title IX of the Education Act Amendments of 1972, which prohibits discrimination on the basis of sex in federally-assisted education programs or activities

(also see 40 C.F.R. Part 5 - Nondiscrimination on the Basis of Sex in Education Programs or Activities Receiving Federal Financial Assistance)

Age Discrimination Act of 1975, which prohibits discrimination on the basis of age in federally-assisted programs or activities; and

Section 13 of the Federal Water Pollution Control Act Amendments of 1972, which prohibits discrimination on the basis of sex in programs or activities receiving financial assistance under the Clean Water Act.

I. Purpose

This grievance procedure is established to ensure prompt, equitable, and fair resolution of complaints alleging discrimination in programs, services, or activities that receive financial assistance from the U.S. Environmental Protection Agency (EPA), including those based on race, color, national origin (including limited English proficiency), sex, disability, age, or retaliation and intimidation.

II. Publication and Accessibility

This grievance procedure is:

- Prominently published on the Worcester County website and in printed materials available at County offices.
- Reviewed annually and revised as necessary to ensure ongoing compliance and effectiveness.

III. Nondiscrimination Coordinator

Name: Stacey Norton

Title: Human Resources Director

Office: Worcester County Administration Office

Address: 1 West Market Street, Rm 1301, Snow Hill, Maryland 21863

Phone: 410-632-0090

Email: snorton@worcestermd.gov

Role of the Coordinator

- Coordinating the implementation of this policy across the organization.
- Overseeing the grievance procedure to ensure timely and fair resolution of complaints.
- Providing notices and information to complainants throughout the grievance process.
- Ensuring compliance with federal civil rights laws and EPA nondiscrimination regulations.
- Ensuring all parties are aware of their rights and responsibilities under this policy.
- Tracking all complaints filed under federal non-discrimination laws and rules, including any patterns or systemic problems.
- Conducting semiannual reviews of all formal and informal discrimination laws and/or other complaints to identify and address any patterns or systemic problems.
- Providing training for staff to ensure that they are appropriately trained on non-discrimination and anti-retaliation policies and procedures, including the grievance process.
- Conducting periodic evaluations of the efficacy of efforts to provide services, aids, benefits, and participation in any of your programs or activities without regard to race, color, national origin, disability, age, sex or prior exercise of rights or opposition to actions protected under federal non-discrimination laws.

IV. Who May File a Complaint

Any individual who believes they have been subjected to discrimination or retaliation by Worcester County, Maryland, in violation of federal civil rights laws or EPA nondiscrimination regulations, may file a complaint. This includes:

- Individuals or groups of individuals.
- Authorized representatives acting on behalf of others.
- County employees, applicants, service recipients, or members of the public.

V. Grounds for Filing

Complaints may be based on any of the following protected classes or actions:

- Race
- Color
- National Origin (including Limited English Proficiency)
- Sex (including sexual orientation and gender identity)
- Disability
- Age
- Retaliation and intimidation for filing a complaint or participating in an investigation

VI. Grievance Processes Available

Worcester County provides one civil rights grievance procedure that encompasses:

- Title VI of the Civil Rights Act of 1964
- Title IX of the Education Amendments of 1972 (where applicable)
- Section 504 of the Rehabilitation Act of 1973
- Age Discrimination Act of 1975
- Any EPA nondiscrimination regulation
- Section 13 of the Federal Water Pollution Control Act

Complainants may also choose to file directly with the U.S. Environmental Protection Agency's External Civil Rights Compliance Office (ECRCO) or other appropriate federal agencies.

VII. Complaint Filing Procedure

1. Submission

Written complaints must be submitted within 180 calendar days of the alleged discrimination to:

Nondiscrimination Coordinator

Name: Stacey Norton

Title: Human Resources Director

Office: Worcester County Administration Office

Address: 1 West Market Street, Rm 1301, Snow Hill, Maryland 21863

Phone: 410-632-0090

Email: snorton@worcestermd.gov

Complaints should include:

- Complainant's name, address, phone/email
- Description of the alleged discriminatory act(s)
- Date(s) of occurrence
- Identity of the person or department alleged to have committed the act
- Any relevant documentation
- Signature of the complainant or their representative

Appropriate assistance shall be provided to individuals with disabilities. Also, complaints in alternative formats shall be accepted from individuals with disabilities. Please reach out to the nondiscrimination coordinator for more information. If the complainant is unable to submit a written complaint, the Nondiscrimination Coordinator should be contacted. Worcester County will make reasonable accommodations in its policies and procedures which are necessary to allow persons with disabilities full access to the complaint filing and investigative process. If you need assistance or accommodations to access this policy, you may contact the nondiscrimination coordinator using the methods listed above. If you require accessibility, disability-related accommodations, or interpretive

services to access the Nondiscrimination Policy, please contact our Nondiscrimination Coordinator at 410-632-0090 or at snorton@worcestermd.gov.

2. Acknowledgment

Within 10 business days, the Coordinator will provide written acknowledgment of the complaint and explain the next steps in the process.

3. Informal Resolution Process

The Non-Discrimination Coordinator may attempt to conciliate and resolve the complaint through a mutually agreeable solution. Any such informal resolution must be signed by both the Non-Discrimination Coordinator and the complainant.

The Non-Discrimination Coordinator may reach out for additional information to work towards informal resolution of the complaint through direct communication with the complainant or their representative. Informal resolution may include open dialogue, discussion using a staff member as an intermediary, or other process that results in an acceptable solution within ten (10) business days from the acceptance of the complaint. Any such informal resolution agreement must be signed by both the Non-Discrimination Coordinator and the complainant.

Worcester County may attempt, if possible, to conciliate and resolve the complaint through a mutually agreeable solution. The focus of this informal resolution process should include improving agency procedures with the intent of preempting the need for future complaints. Upon informal resolution as contemplated here, the non-discrimination coordinator shall provide a letter of resolution summarizing the allegations and describing the informal resolution mutually agreed to by the complainant and the respondent. Such a letter of resolution shall result in Worcester County's closure of the complaint file.

VIII. Investigation Process

1. Investigation

- The investigation will begin promptly and will be completed within 180 calendar days, barring extenuating circumstances.
- A preponderance of the evidence standard will be used to determine if discrimination occurred.

2. Interviews and Review

- The Coordinator may interview the complainant, respondent, and relevant witnesses, and request relevant documents.
 - Confidentiality will be maintained to the extent possible.
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IX. Resolution and Outcome

- A written determination will be issued within 180 calendar days of complaint receipt, unless extended for good cause with notice to all parties.
 - The written notice will include:
 - Whether discrimination was found;
 - A summary of the investigation and findings;
 - Any remedial actions to be taken, if applicable.
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X. Appeal Process

- If the complainant disagrees with the outcome, an appeal may be submitted to the County Administrator's Office, with carbon copies to Nondiscrimination Coordinator within 15 calendar days of receiving the determination.
 - The appeal will be reviewed and resolved within 180 calendar days by an impartial reviewer not involved in the original investigation.
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XI. Prohibition on Retaliation

Worcester County prohibits any form of intimidation, threat, coercion, or retaliation against individuals who file complaints or participate in investigations. Any retaliation allegations will be handled using the same grievance process.

XII. Recordkeeping and Reporting

- All complaints and related documents will be maintained by the Nondiscrimination Coordinator for at least three years.

- Summary reports will be made available to oversight agencies upon request.
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XIII. Annual Review

The County will conduct an annual review of this grievance procedure, including its publication, accessibility, and effectiveness. Updates will be made as necessary.

**For questions or assistance with this grievance procedure, contact the
Nondiscrimination Coordinator at:**

Name: Stacey Norton

Title: Human Resources Director

Office: Worcester County Administration Office

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