

Nondiscrimination Complaint Policy & Procedure

I. Purpose and Statement of Nondiscrimination

The Land Trust Alliance ("Alliance") is committed to ensuring that no person is excluded from participation in, denied the benefits of, or subjected to discrimination under any Alliance-sponsored program or activity on the basis of race, color, national origin, sex, age, or disability, consistent with Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, the Age Discrimination Act of 1975, and related federal regulations. This Policy establishes a prompt, fair, and transparent process for receiving, investigating, and resolving such complaints. This Policy does not apply to nor amend the Alliance's employee policies, and employees with related complaints must follow the policies and procedures in the Alliance's Employee Handbook.

II. Civil Rights Coordinator

All complaints and inquiries under this Policy shall be directed to:

Civil Rights Coordinator/Chief Operating Officer Land Trust Alliance 1250 H Street NW, Suite 600, Washington, DC 20005 civilrights@lta.org | (202) 638-4725

The Coordinator is responsible for accepting complaints, conducting or overseeing investigations, issuing findings, and maintaining required records.

III. Who May File a Complaint

Any individual, group, or organization who believes they have been subjected to prohibited discrimination by the Alliance, or who believes they have been adversely affected by an Alliance policy or practice that has a discriminatory impact, may file a complaint. A parent or guardian may file on behalf of a minor or person with a disability.

IV. Timeliness

A complaint should be filed as soon as possible but no later than 180 calendar days after the alleged discrimination. The Coordinator may extend this period for good cause shown.

V. How to File

Any complaint filed under this policy must be in writing and delivered via email or mail (complaints via other channels, such as through social media, may not be received by the Coordinator and therefore will not be considered a valid written complaint).

- 1. **Written Complaint Form** The preferred method is the Alliance's Nondiscrimination Complaint Form (attached to this Policy and available in alternative formats upon request).
- 2. **Alternative Formats** Complaints may also be submitted by letter, email, or voice recording, so long as they contain the information identified in Section VI below.
- 3. **Language & Accessibility Assistance** The Alliance will provide free language assistance, auxiliary aids, and accommodations as needed to ensure equal access to the complaint process. Contact the Coordinator to arrange assistance.

VI. Minimum Complaint Contents

To expedite review, the complaint should include:

- Complainant's name, address, telephone number, and email;
- If filed by a representative, the representative's contact information and relationship to the complainant;
- Description with specificity of the alleged discriminatory action, including date(s), location, and the Alliance program or activity involved;
- Basis of discrimination (race, color, national origin, sex, age, or disability);
- Names and contact information of any witnesses; and
- Desired remedy or outcome.

VII. Acknowledgment & Preliminary Review

Within ten business days of receipt, the Coordinator will acknowledge the complaint in writing, confirm jurisdiction, and notify the complainant if additional information is required. If the complaint does not fall within this Policy, the Coordinator will advise the complainant and, when possible, refer them to the appropriate entity.

VIII. Investigation Procedure

- 1. **Fact-Finding** The Coordinator (or designee) will gather relevant documents, interview the complainant, witnesses, and Alliance personnel, and review applicable policies.
- 2. **Timeframe** Investigations will ordinarily be completed within 60 calendar days of receipt. If additional time is needed, the Coordinator will provide written notice to the complainant explaining the delay and an anticipated completion date.
- 3. **Interim Measures** When warranted, the Alliance may implement temporary measures to prevent ongoing discrimination or retaliation during the investigation.

IX. Findings & Resolution

Within 15 business days after the investigation closes, the Coordinator will issue a written determination that includes: (a) a summary of allegations; (b) findings of fact; (c) a conclusion as to whether discrimination occurred; and (d) any corrective actions or remedies. The determination will be sent simultaneously to the complainant and the applicable Alliance department.

X. Corrective Action & Monitoring

When discrimination is substantiated, the Alliance will promptly implement appropriate corrective actions, which may include policy changes, training, program modifications, or other remedies. The Coordinator will monitor implementation and closure.

XI. Appeal

If the complainant disagrees with the determination, they may submit a written appeal to the Alliance Chief Executive Officer within 30 calendar days of the decision. The CEO (or designee uninvolved in the initial investigation) will issue a final decision within 30 calendar days. Exhaustion of the Alliance's internal process is not a prerequisite to filing with federal agencies; complainants may file directly with the U.S. Environmental Protection Agency (EPA) Office of Civil Rights or other appropriate agencies at any time.

XII. Prohibition on Retaliation

The Alliance strictly prohibits retaliation against any individual who files a complaint, participates in an investigation, or otherwise exercises rights under this Policy. Allegations of retaliation will be handled with the same rigor as discrimination complaints.

XIII. Confidentiality

The Alliance will protect the confidentiality of complainants and witnesses to the extent possible and consistent with a thorough investigation and applicable law.

XIV. Recordkeeping

The Coordinator will maintain complete files of all complaints, investigations, determinations, and appeals for a minimum of three years after final resolution or as otherwise required by federal regulations.

XV. Publication & Training

This Policy, the Complaint Form, and Coordinator contact information will be posted prominently on the Alliance's website and made available at all Alliance offices. The Alliance will provide periodic training to staff and program partners on their obligations under this Policy.

Attachment: Nondiscrimination Complaint Form



Nondiscrimination Complaint Form

1.	Your	contact	information:
	ı oui	Contact	IIII OI III ationi

partner, contractor, other)

Name

Title	
Organization (if applicable)	
Address	
Phone	
Email	
2. Your complaint of disc	crimination is made about:
Name	
Title	
Organization (if applicable)	
Address	
Phone	
Email	
Relationship to you (e.g.,	

3. Please describe what happened and how it has affected you or your ability to participate in Alliance programs or activities. Please use additional sheets if necessary and attach any relevant documents or evidence.

	Is the discrimination continuing?	Yes	No
5.	Please list the name and contact infinance information related to your con		any witnesses or individuals who may
6.		did you comp	ormation (verbal or written) about related plain or provide information? If you have ith them, please provide their contact
7.	What is the basis of discrimination a ☐ Race ☐ Color ☐ National Origin	alleged? (Ch	eck all that apply)
0	□ Sex□ Age□ Disability	ooking?	
δ.	What remedy or outcome are you se	eeking?	
	Signature:		Date:
	Name (printed):		

4. Date(s) discrimination occurred: