

**ASTSWMO Civil Rights Policy**  
**February 2021**

## **Section 1**

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance. The Americans with Disabilities Act (ADA) and Section 504 of the Rehabilitation Act prohibit discrimination on the basis of disability by state or local government agencies and recipients of federal financial assistance. Discrimination includes, but is not limited to, excluding an individual from participation in or denying an individual the benefits of any program or activity receiving Federal financial assistance due to the individual's race, color, national origin, including limited English proficiency, sex, age or disability and further included intimidation and retaliatory conduct.

The Association of State and Territorial Solid Waste Management Officials (ASTSWMO) does not exclude, deny benefits to, or otherwise discriminate against any person on the grounds of race, color, national origin, sex, age, or disability, whether carried out by ASTSWMO directly or any other entity with whom the ASTSWMO arranges to carry out its programs and activities.

## **Section 2**

This Complaint and Compliance Review procedure is established so that anyone who believes he or she has been subjected to discrimination in the receipt of benefits and/or services from ASTSWMO on the grounds of race, color, national origin, sex or age, or has been subjected to intimidation or retaliation because he or she has exercised a right to participate in or opposed actions protected by EPA's implementing non-discrimination regulations at 40 C.F.R. Parts 5 and 7, or for the purpose of interfering with such rights, may file a complaint following the outline below.

The complaint should be in writing and contain information about the complainant and the alleged discrimination such as:

1. The name, address, and phone number of complainant;
2. The name of the employee(s) or contractors against whom the complaint is filed;
3. The location, date, and description of the alleged violation; and
4. The signature of the complainant or his or her designee.

A complaint regarding discrimination in or language access to ASTSWMO services, programs and activities should be submitted by the complainant or his or her designee as soon as possible but no later than 180 calendar days after the alleged violation to:

Dania E. Rodriguez  
Executive Director  
1101 17<sup>th</sup> Street, NW, Suite 707  
Washington, DC 20036  
(202) 640-1061  
[daniar@astswmo.org](mailto:daniar@astswmo.org).

If a complaint is submitted directly to an ASTSWMO Board of Directors or staff member, they shall forward the complaint to the Executive Director within 5 calendar days.

After receipt of the complaint:

1. The Executive Director, or her or his designee, within 10 days of receipt, will send the complainant an acknowledgement letter informing her/him whether the complaint will be investigated;
2. An appropriate, prompt, and impartial investigation of any allegations filed under Title VI or related federal non-discrimination statutes will be conducted. A preponderance of the evidence standard will be applied during the analysis of the complaint.
3. The Executive Director, or her or his designee, may attempt to conciliate and resolve the complaint through a mutually agreeable solution.
4. The Executive Director will provide a written response to the complainant at the conclusion of the investigation.
5. The Executive Director shall maintain records of complaints received, informal resolutions and investigation findings.

If the response does not satisfactorily resolve the issue, the complainant has the right to file his or her complaint with the associated federal agency. These procedures do not deny the right of the complainant to file a complaint with state or federal agencies, or to seek private counsel for complaints alleging discrimination, intimidation, or retaliation of any kind that is prohibited by law.