



Board of County Commissioners Agenda Request

21
Agenda Item #

Requested Meeting Date: 3/24/2026

Title of Item: Consolidated Civil Rights, Nondiscrimination, and Program Access Policy

<input type="checkbox"/> REGULAR AGENDA <input checked="" type="checkbox"/> CONSENT AGENDA	Action Requested: <input checked="" type="checkbox"/> Approve/Deny Motion <input type="checkbox"/> Adopt Resolution (attach draft) <input type="checkbox"/> Hold Public Hearing <i>*provide copy of hearing notice that was published</i>	<input type="checkbox"/> Direction Requested <input type="checkbox"/> Discussion Item <input type="checkbox"/> Information Only
Submitted by: Bobbie Danielson <i>Bobbie Danielson</i>		Department: HR Dept.
Presenter (Name and Title): Bobbie Danielson, HR Director		Estimated Time Needed: N/A, consent agenda
Summary of Issue: <p>Several federal and state grant applications require submission of the County's civil rights, nondiscrimination, and program access policies. For example, the recent VCET grant application for the Sheriff's Office required detailed documentation demonstrating compliance with federal laws.</p> <p>This policy consolidates our compliance efforts into a single document. This approach improves administrative efficiency when we're filling out grant applications and reports, ensures consistency across departments, and reduces risk associated with fragmented or inconsistent policy documentation.</p>		
Alternatives, Options, Effects on Others/Comments:		
Recommended Action/Motion: Motion to approve the Aitkin County Civil Rights, Nondiscrimination, and Program Access Policy as presented.		
Financial Impact: <i>Is there a cost associated with this request?</i> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <i>What is the total cost, with tax and shipping? \$</i> <i>Is this budgeted?</i> <input type="checkbox"/> Yes <input type="checkbox"/> No <i>Please Explain:</i>		

AITKIN COUNTY
CIVIL RIGHTS, NONDISCRIMINATION, AND PROGRAM ACCESS POLICY
(Applicable to All Federally and State Funded Programs)

3/3/2026

I. Purpose

The purpose of this policy is to ensure Aitkin County's compliance with all applicable federal and state civil rights laws and regulations, including but not limited to:

- Title VI of the Civil Rights Act of 1964
- Title VII 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
- Americans with Disabilities Act (ADA)
- Age Discrimination Act of 1975
- Violence Against Women Act (VAWA), if applicable
- 28 C.F.R. Part 42
- Minnesota Human Rights Act (Minn. Stat. §363A)

Aitkin County prohibits discrimination in employment and in the delivery of services.

II. Nondiscrimination in Employment and Services

Aitkin County does not discriminate against employees, applicants, program participants, beneficiaries, or prospective participants or beneficiaries on the basis of:

- Race
- Color
- National origin
- Religion
- Sex
- Sexual orientation
- Gender identity
- Age
- Disability
- Creed
- Marital status
- Familial status
- Pregnancy
- Public assistance status
- Veteran status
- Genetic information
- Political affiliation
- Any other protected status under federal or state law

This prohibition applies to all employment practices and to the delivery of all County programs and services.

III. Notification of Rights

Aitkin County provides notice of its nondiscrimination obligations by:

- Publishing nondiscrimination statements in policies
- Including nondiscrimination language on recruitment job descriptions
- Posting policies on the County intranet

- Providing policies to new hires
- Making policies available upon request

IV. Complaint Procedure (Program Participants and Beneficiaries)

Any program participant, beneficiary, prospective participant, or beneficiary who believes they have been subjected to discrimination may file a complaint by contacting:

Human Resources Director

Aitkin County Government Center
307 2nd Street NW, Room 312
Aitkin, MN 56431
Phone: (218) 927-7306

Complaints may be made verbally or in writing.

The County will:

- Promptly review and investigate complaints
- Provide a fair and equitable resolution process
- Refer complaints to appropriate state or federal agencies when required
- Notify Minnesota OJP when referral to EEOC, Minnesota Department of Human Rights, or other agencies occurs, if required

Program participants also retain the right to file complaints directly with:

- Minnesota Department of Human Rights
- U.S. Department of Justice, Office for Civil Rights
- Equal Employment Opportunity Commission (for employment matters)

V. Employment Discrimination Complaints, ADA/Section 504 Coordination

Aitkin County maintains grievance procedures that provide due process and prompt, equitable resolution of employment-related discrimination complaints, including disability discrimination under ADA and Section 504.

The Human Resources Director serves as the County's:

- EEO Coordinator
- ADA/Section 504 Employment Compliance Coordinator

In this capacity, the Human Resources Director is responsible for:

- Employment-related disability accommodation requests
- Disability discrimination complaints related to employment
- Intake of program-related discrimination complaints
- Oversight of grievance procedures under Section 504

Responsibility for structural accessibility, building access, and physical facility compliance under the Americans with Disabilities Act is assigned to the appropriate County department responsible for facilities management and capital improvements.

The County Administrator retains overall responsibility for ensuring County-wide compliance with ADA and Section 504 requirements.

VI. Disability Nondiscrimination and Accommodation

Aitkin County:

- Prohibits discrimination on the basis of disability
 - Provides reasonable accommodations in employment and program access
 - Maintains grievance procedures compliant with ADA standards
 - Notifies employees of disability nondiscrimination protections
 - Posts a public notice of nondiscrimination for program participants
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VII. Limited English Proficiency (LEP)

Aitkin County is committed to meaningful access for individuals with Limited English Proficiency (LEP).

The County will:

- Coordinate language assistance services upon request
 - Train staff to appropriately respond to language access requests
 - Ensure that LEP individuals are not denied meaningful access to services
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VIII. Religious Nondiscrimination

Aitkin County provides federally funded services regardless of religion, religious belief, refusal to hold a religious belief, or refusal to participate in religious practices.

The County does not engage in explicitly religious activities as part of federally funded programs.

Aitkin County is not a religious institution or faith-based organization.

IX. VAWA Compliance

If receiving VAWA or OVW funding, Aitkin County:

- Serves all eligible victims regardless of gender
 - Does not discriminate based on sexual orientation or gender identity
 - Does not provide impermissible sex-segregated services
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X. Training and Oversight

Aitkin County:

- Provides training to leadership and supervisors on EEO, civil rights, affirmative action, lawful hiring practices, reasonable accommodation, and documentation
 - Ensures policies are consistently applied
 - Complies with any mandatory reporting to OCR-USDOJ
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XI. Reporting of Findings

If any federal or state court or administrative agency issues findings of discrimination against the County on protected grounds, the County will comply with applicable reporting requirements and any legally binding orders, subject to its rights to administrative or judicial review as permitted by law.

XII. Policy Availability

This policy shall be:

- Available upon request
 - Maintained in official policy records
 - Posted on the internet
 - Provided to all departments administering grant-funded programs
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