



# Great Rivers Greenway

**Compliance Plan  
Title VI of the  
Civil Rights Act of 1964**

## **Title VI Policy Statement**

The Metropolitan Park and Recreation District (hereinafter “Great Rivers Greenway”) has a policy of assuring that no person shall, on the grounds of race, color, national origin, gender, or disability—as provided by Title VI of the Civil Rights Act of 1964 and related nondiscrimination laws—be denied the benefits of, or be otherwise subjected to, discrimination in Great Rivers Greenway’s programs or activities. Great Rivers Greenway further assures that it has a policy of nondiscrimination on these bases in all of its programs and activities, whether those programs and activities are federally funded or not.

Great Rivers Greenway includes language requiring nondiscrimination on the bases stated above in all written agreements with subrecipients, contractors and consultants on projects receiving federal funding and will monitor programs and activities for compliance.

The Great Rivers Greenway Chief Operating Officer will be responsible for monitoring Title VI and related activities, and all other responsibilities as required.

Persons who believe they have been discriminated against in Great Rivers Greenway’s programs or activities should contact the Title VI Coordinator, at Title VI Coordinator, Great Rivers Greenway, 3745 Foundry Way, Suite 253, St. Louis, MO 63110.

This policy was adopted by the Board of Director on February 9, 2021.

## Introduction

Great Rivers Greenway is dedicated to an inclusive process that allows all citizens affected by the district's activities to have a voice. On occasion, Great Rivers Greenway (which covers St. Louis City, St. Louis County, and St. Charles County) receives federal funding for projects. Great Rivers Greenway is committed to operating in a manner that prohibits discrimination on the basis of race, color, national origin, gender, or disability status as protected by relevant laws and guidance.

**Title VI of the 1964 Civil Rights Act** provides that “No person in the United States shall, on the basis of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance (Sec. 601).”

The **Civil Rights Restoration Act of 1987** amended Title VI to specify that entire institutions receiving federal funds, whether schools, colleges, government entities, or private employers must comply with federal civil rights laws, rather than just the particular programs or activities that receive federal funds.

The **Americans with Disabilities Act of 1990** prohibits discrimination and ensures equal opportunity for persons with disabilities in employment, state and local government services, public accommodations, commercial facilities, and transportation.

**Executive Order 12898 on Environmental Justice** provides that “each federal agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations (Sec. 101).”

**Executive Order 13166 on Improving Access to Services for Persons with Limited English Proficiency** requires federal agencies to examine the services they provide, identify any need for services to those with limited English proficiency (LEP), and develop and implement a system to provide those services so LEP persons can have meaningful access to federally conducted and federally assisted programs.

This plan provides information regarding Great Rivers Greenway's Title VI compliance policies, complaint procedures, and a form to initiate the complaint process for use by members of the public. This plan does not govern disputes between individuals and other individuals or businesses that have no relation to Great Rivers Greenway.

## **Coordination Responsibilities**

The Chief Operating Officer serves as the Great Rivers Greenway Title VI Civil Rights Coordinator, and is responsible for ensuring the implementation of the Great Rivers Greenway Title VI Compliance Plan. The Chief Operating Officer is also responsible for implementing, monitoring, and ensuring Great Rivers Greenway's compliance with Title VI regulations.

## **Access for Persons with Disabilities**

Great Rivers Greenway is committed to providing accessible opportunities to persons of all abilities, including individuals with disabilities. A person with a disability is defined by the Americans with Disabilities Act of 1990 (ADA) as someone who has a physical or mental impairment that substantially limits one or more major life activities; has a record of such an impairment, or; is regarded as having such an impairment.

Requests for adaptations, auxiliary services, or reasonable accommodations in Great Rivers Greenway programs, activities, or services due to disability should be made to the Title VI Coordinator. Requests should be made as soon as possible to ensure the greatest ability to meet requests as appropriate, preferably no later than five business days prior to a planned event or meeting. Examples of adaptations, auxiliary services, or accommodations may include but are not limited to qualified interpreters, large-print written materials, or relocation of an activity to a more accessible location. The Title VI Coordinator, or his or her designee, will work with the requester to determine any appropriate accommodations to meet the individual's needs on a case-by-case basis.

Great Rivers Greenway often partners with non-public entities to host programs or promotes programs hosted by non-public entities. Requests for adaptations, auxiliary services, or reasonable accommodations for such programs hosted by non-public entities should be made directly to the hosting entity.

All planning, design, engineering and construction consultants performing tasks on behalf of Great Rivers Greenway are required to perform all tasks in strict compliance with ADA and other applicable laws and Missouri's accessibility standards.

## **Limited English Proficiency**

Great Rivers Greenway is committed to communicating with all residents consistently and appropriately without regard to English proficiency. Numbers of persons with limited English proficiency (LEP) vary in different parts of the district. Great Rivers Greenway staff will determine the appropriate mix of written and oral language communications for LEP individuals, to include but not limited to in writing, on paper, over the Internet, written

translations, oral assistance, or through commissioned translation. Individuals with questions about such services should contact the Title VI Coordinator.

Great Rivers Greenway holds frequent public meetings, including regular and special meetings for the Board of Directors, workshop sessions, and project-specific meetings and open houses. These meetings are free and open to the public. Anyone wishing to request an interpreter for a meeting should do so as soon as possible.

### **Environmental Justice Commitment**

Environmental justice refers to the federal government policy that all agencies will identify and address disproportionately high and adverse human health or environmental effects of their policies, programs, and activities on minority populations and low-income populations. A disproportionately high impact is an adverse effect that is, or will be predominately borne by a minority population and/or low income population and is appreciably more severe or greater in magnitude than the adverse effect that will be suffered by the non-minority and/or non-low income population.

In proposed programs, policies, and activities where a disproportionately high impact is identified, Great Rivers Greenway shall propose measures to avoid, mitigate, or minimize it and interrelated social and economic effects. Great Rivers Greenway shall solicit public involvement opportunities, including solicitation of input from affected minority and low-income populations, in considering alternatives that would result in avoiding and/or minimizing disproportionately high and adverse human health and environmental impacts.

### **Complaint Procedures**

Should a person have a complaint of discrimination on the basis of race, color, national origin, or disability in the provision of services, activities, programs or benefits by Great Rivers Greenway, the person should complete the attached Discrimination Complaint Form and submit it to the Great Rivers Greenway Title VI Coordinator. The complaint should be submitted by the complainant or the complainant's designee (collectively, complainant) as soon as possible but no later than 60 calendar days after the alleged violation to:

Title VI Coordinator  
Great Rivers Greenway  
3745 Foundry Way, Suite 253  
St. Louis, MO 63110

Great Rivers Greenway will endeavor to obtain early resolution of complaints. The Title VI Coordinator will pursue a timely resolution to the complaint.

After receiving a complaint, the Title VI Coordinator or the Title VI Coordinator's designee (collectively, Title VI Coordinator) will contact the complainant using the contact information provided to arrange to meet with the complainant within 30 calendar days after receipt of the complaint to discuss the complaint and possible resolutions. The Title VI Coordinator may request that the complainant provide additional information needed within a reasonable time.

Within 15 calendar days of the meeting, the Title VI Coordinator, in consultation with the Great Rivers Greenway Legal Counsel, will respond in writing. The response will explain the assessment of the Title VI Coordinator and other options for substantive resolution of the complaint. The Title VI Coordinator will communicate to the complainant if additional time is needed to assess the complaint.

If the response by the Title VI Coordinator does not satisfactorily resolve the issue, the complainant may appeal the decision within 15 calendar days of the response<sup>1</sup> to the Great Rivers Greenway Board of Directors. The appeal should take the form of a written letter describing the initial complaint, the initial response, and the ways in which the initial response does not satisfactorily address the complaint. The appeal should be sent to the same address the initial complaint was delivered to.

Great Rivers Greenway will contact the complainant to arrange for the complainant to meet with an appropriate representative(s) of the Great Rivers Greenway Board (as determined by that board) within 30 calendar days after receipt of the appeal to discuss the appeal. Within 15 calendar days after the meeting, the Great Rivers Greenway Board of Directors will respond in writing. The board will communicate to the complainant if additional time is needed to resolve the appeal. The board's ultimate resolution of the appeal is final.

Great Rivers Greenway may administratively close a complaint or appeal if the complainant does not respond to contact attempts, fails to respond to repeated requests for information needed, or no longer wishes to pursue the complaint.

All complaints received by the Title VI Coordinator, appeals to the Great Rivers Greenway Board of Directors, and responses will be retained by Great Rivers Greenway for at least five years.

---

<sup>1</sup> The time for appeal will run from: in the case of a hardcopy response, the date of postmark or delivery recorded by courier service; in the case of email to an address provided by complainant, the date of sending; or, in the case of in-person delivery by a Great Rivers Greenway employee, the date of delivery.



**Title VI of the 1964 Civil Rights Act  
Discrimination Complaint Form**

Instructions: Please fill out this form completely, in black ink or type. Sign and return to the address on the final page. Alternate means of filing a complaint, such as personal interview or audio recording, will be made available upon request to the Title VI Coordinator.

Complainant: \_\_\_\_\_

Address: \_\_\_\_\_

City, State & Zip: \_\_\_\_\_

Home Phone: \_\_\_\_\_ Mobile Phone: \_\_\_\_\_

Email: \_\_\_\_\_

Person Discriminated Against: \_\_\_\_\_  
(if other than complainant)

Address: \_\_\_\_\_

City, State & Zip: \_\_\_\_\_

Home Phone: \_\_\_\_\_ Mobile Phone: \_\_\_\_\_

I believe the discrimination I experienced was based on (check all that apply):

- Race                       Color                       National Origin                       Disability

Where did the alleged discrimination take place?

\_\_\_\_\_

When did the alleged discrimination occur (Date/Time)? \_\_\_\_\_

Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information. Attach any relevant documentation and/or attach additional pages if necessary.

---

---

---

Have you previously filed a discrimination complaint with Great Rivers Greenway?

Yes \_\_\_\_\_ No \_\_\_\_\_

Has the complaint been filed with any federal, state, or local civil rights agency or court?

Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, with what agency or court? \_\_\_\_\_

Contact Person: \_\_\_\_\_

Address: \_\_\_\_\_

City, State & Zip: \_\_\_\_\_

Telephone Number: \_\_\_\_\_

Date Filed: \_\_\_\_\_

Do you intent to file with another agency or court? Yes \_\_\_\_\_ No \_\_\_\_\_

If yes, with what agency or court? \_\_\_\_\_



Contact Person: \_\_\_\_\_

Address: \_\_\_\_\_

City, State & Zip: \_\_\_\_\_

Telephone Number: \_\_\_\_\_

Additional space for answers:

---

---

---

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Return to: Title VI Civil Rights Coordinator  
Great Rivers Greenway  
3745 Foundry Way, Suite 253  
St. Louis, MO 63110

If information is needed in another language, then contact the Title VI Coordinator.