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[www.townofbeloitwi.gov](http://www.townofbeloitwi.gov)

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MEMORANDUM

March 1, 2024

TO: Town of Beloit Board of Supervisors  
FROM: Tim Wellnitz, Town Administrator  
RE: Discussion and possible action on amendment to staff policy manual

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**STAFF RECOMMENDATION**

I recommend that the proposed staff policy manual amendment be approved with the non-discrimination policy being amended to read as follows:

**10.00 NONDISCRIMINATION POLICY**

**10.01 NONDISCRIMINATION**

1. Policy and Notice of Non-Discrimination. The Town of Beloit complies with Federal civil rights laws and is committed to providing its programs and services without discrimination in accordance with:
  - Title VI of the Civil Rights Act of 1964, which prohibits discrimination based on race, color, or national origin (including language).
  - Section 504 of the Rehabilitation Act of 1973, which prohibits discrimination based on disability.
  - Title IX of the Education Amendments Act of 1972, which prohibits discrimination based on sex in education programs or activities.
  - Age Discrimination Act of 1975, which prohibits discrimination based on age.
  - U.S. Department of Homeland Security regulation 6 C.F.R. Part 19, which prohibits discrimination based on religion in social service programs.

It is against the law for the Town of Beloit to retaliate against anyone who takes action to oppose discrimination, files a grievance, or participates in the investigation of a grievance in accordance with the above authorities.

2. To File a Complaint. If you think that the Town of Beloit has failed to provide these services or discriminated in another way based on race, color, national origin (including language), disability, sex, age, or religion, you can file a complaint in person or by mail, fax or email with:  
Town Administrator Tim Wellnitz  
2445 S. Afton Rd., Beloit, WI 53511  
phone – 608-472-2680  
fax – 608-364-2999  
e-mail - [twellnitz@town.beloit.wi.us](mailto:twellnitz@town.beloit.wi.us)

Alternative means of communication for programs, services, or complaint filing information (e.g., Braille, large print, audiotape, American Sign Language, etc.) should contact the agency's Town Administrator at: [twellnitz@town.beloit.wi.us](mailto:twellnitz@town.beloit.wi.us)

Additionally, program, service, and complaint filing information may be made available in languages other than English.

The Town of Beloit accepts and responds to complaints of discrimination from program beneficiaries that are filed no later than 180 days after the date of the alleged discrimination.

The Town of Beloit is designated to provide complainants with written acknowledgment of the complaint within 10 days of receipt. Correspondence with the complainant will be by email, unless the complainant specifies another preferred method to respond in writing.

The Town of Beloit will investigate and resolve complaints, either internally or externally within 6 months of receipt, or will refer the complaint within 14 days of receipt.

The Town of Beloit maintains a complaint log to track all complaints received and the status of each complaint.

You can also file a civil rights complaint with the U.S. Department of Homeland Security Office for Civil Rights and Civil Liberties (CRCL):

**E-mail:** [CRCLCompliance@hq.dhs.gov](mailto:CRCLCompliance@hq.dhs.gov) (fastest method to submit your complaint)

**Fax:** 202-401-4708

**U.S. Mail:**

U.S. Department of Homeland Security Office for Civil Rights and Civil Liberties  
Compliance Branch, Mail Stop #0190  
2707 Martin Luther King, Jr. Ave., SE Washington, D.C. 20528

For additional information: [www.dhs.gov/crcl](http://www.dhs.gov/crcl) Phone: 202-401-1474 Toll-Free: 1-866-644-8360

### 3. Information and Services for Persons with Disabilities and Persons with Limited English Proficiency.

The Town of Beloit:

- Provides free aids and services, such as qualified sign language interpreters and written information in other formats (large print, audio, accessible electronic formats, etc.), to communicate effectively with persons with disabilities.
- Provides free language services, such as qualified foreign language interpreters and information written in other languages, to ensure meaningful access to programs and activities for persons with limited English proficiency.

If you need these services, please contact:

Town Administrator Tim Wellnitz  
2445 S. Afton Rd., Beloit, WI 53511  
[twellnitz@town.beloit.wi.us](mailto:twellnitz@town.beloit.wi.us)  
phone – 608-472-2680  
fax – 608-364-2999

#### 4. Limited English Proficiency

Section 3 provides the Town of Beloit's nondiscrimination policy regarding the requirement to provide meaningful access to programs and services to individuals with limited English proficiency (LEP),

Per the U.S. Census data of 2020 the number of LEP individuals eligible or likely to be served within the jurisdiction of the Town of Beloit is recorded at 6.0%. The top language spoken other than English is Spanish.

The Town of Beloit meets requirements to take reasonable steps to provide meaningful access to out programs and services through our language access plan.

Methods to provide language assistance:

- Use of language applications on smart phones.
- Agency staff to assist in arranging for oral interpretation of LEP via a contracted service.
- Agreement with local 911 Center to assist with interpretation services for other languages.

Notification to LEP persons of the availability of free language service is provided when LEP persons request services through the process described in the non-discrimination policy statement.

#### **RECOMMENDED MOTION**

I move to approve the proposed staff policy manual amendment.

#### **BACKGROUND**

The Town of Beloit staff policy manual establishes various administrative policies of the Town of Beloit. The Town Board approved of a comprehensive update to the policy manual at the December 4, 2023 Board meeting. The Town Board approved of the addition of a non-discrimination policy to the staff manual at the February 19, 2024 Town Board meeting. The February 19, 2024 update was submitted to the U.S. Department of Homeland Security for review. Tweaks were made based upon the feedback received and the proposed language has received approval. The changes primarily related to the addition of Section 2 language on complaint process and the addition of Section 4.

#### **ANALYSIS**

The proposed amendment revises the non-discrimination policy as required to meet grant requirements.

**cc: Karry DeVault, Town Clerk**