GREENE COUNTY GOVERNMENT

TITLE VI PROGRAM COMPLAINT AND COMPLIANCE MONITORING PROCESS

Policy 4.3 | Revised: November 2026

I. Policy Statement

Greene County Government prohibits discrimination based on race, color, or national origin in programs, services, and activities covered by Title VI of the Civil Rights Act of 1964 and applicable implementing regulations. No person shall, on those grounds, be excluded from participation in, denied benefits of, or otherwise subjected to discrimination in a covered program or activity. Retaliation against a person for making a good-faith complaint or participating in a review is prohibited.

II. Purpose and Scope

This policy establishes procedures for receiving, assessing, investigating, resolving, appealing, and monitoring Title VI concerns. It applies to Greene County Government departments and, as applicable, contractors, subcontractors, and other entities administering covered County programs. Employment-related complaints are referred to the appropriate employment complaint process unless Title VI independently applies.

III. Responsibility

The Title VI Coordinator administers this process, maintains complaint records, coordinates language assistance and notices, and reports compliance concerns to appropriate County leadership. Department heads shall promptly forward complaints and cooperate in reviews. The County Mayor or designee shall designate an impartial alternative reviewer when the Coordinator has a conflict of interest or is the subject of a complaint. Complaints involving the Mayor or another official shall be referred to independent counsel or another impartial reviewer designated consistent with County authority.

IV. How to File a Complaint

A person who believes they experienced discrimination based on race, color, or national origin in a covered County program may contact the Title VI Coordinator. Complaints should ordinarily be submitted within 180 calendar days of the alleged incident. The Coordinator will assess late complaints for good cause and any applicable program-specific requirements; this internal period does not limit a person's right to file directly with an external agency under its rules.

Complaints may be submitted by letter, email, telephone, fax, or in person. Staff shall assist a person who needs help reducing an oral complaint to writing, including appropriate language assistance. A signature may be requested but lack of a signature alone will not prevent initial review. Anonymous allegations will be evaluated to the extent sufficient information is available.

Contact: Title VI Coordinator, Greene County Government, 401 Takoma Avenue, Suite 204, Greeneville, TN 37743. Mailing: P.O. Box 1655, Greeneville, TN 37744. Phone: 423-798-1782. Fax: 423-798-1783. Email: eelmore@greenecountytn.gov.

V. Intake and Investigation

1. Any County employee receiving a complaint shall forward it to the Title VI Coordinator as soon as practical, preferably within two business days. Immediate safety or service concerns shall be addressed without awaiting the investigation.

2. The Coordinator will document the complainant's contact details (if available), relevant department or service, date and location, protected basis alleged, description of events, witnesses, requested resolution, and any accessibility or language assistance needs.

3. The Coordinator will acknowledge receipt, normally within five business days, explain the review process, and assess jurisdiction, conflicts of interest, and whether another agency or procedure should handle the matter.

4. An impartial investigator will gather relevant records, interview appropriate individuals, assess evidence, and document findings. Information will be shared only as reasonably necessary, subject to law and records obligations. Parties shall be treated fairly and protected against retaliation.

5. The County will aim to issue a written determination within 30 calendar days after receiving sufficient complaint information. If additional time is necessary, the complainant will be informed of the reason and anticipated next step. Findings and corrective measures will be communicated to the extent legally appropriate.

6. Where a violation or service barrier is identified, the County will consider appropriate corrective action, training, procedural changes, and follow-up monitoring. The County Attorney should be consulted on legal issues as appropriate.

VI. Internal Reconsideration

A complainant may request reconsideration in writing within 60 calendar days after receiving the determination. The request should identify the disputed finding or additional information. The County Attorney or an impartial designee not involved in the initial decision will coordinate the review, with any necessary recusal. The County will provide a written response within a reasonable period. This optional internal review does not restrict external filing rights.

VII. External Complaints

A person may also contact an appropriate federal or state civil-rights enforcement agency with jurisdiction over the program, including the agency providing federal financial assistance. External filing deadlines and procedures may differ. County staff shall not discourage external filing. An

external investigation does not automatically suspend the County's own review; the County will coordinate as appropriate to avoid interference or duplication.

VIII. Monitoring, Notice, and Training

The Title VI Coordinator will maintain public notice of nondiscrimination and complaint options; coordinate periodic employee training; review contractor compliance provisions when applicable; track complaint trends, language-assistance requests, corrective actions, and relevant program access concerns; and conduct periodic desk reviews or site reviews as appropriate. Departments shall cooperate and make relevant notices and language-access information available.

IX. Records and Periodic Review

Complaint files, correspondence, findings, and monitoring records shall be retained in accordance with the County's approved records retention schedule, litigation holds, and applicable grant or agency requirements. The prior policy specified ten years; that period should be confirmed with the County's records officer and counsel before final adoption. This policy shall be reviewed periodically and whenever governing requirements materially change.

X. Implementation Notes — Confirm Before Adoption

• Confirm the current County Attorney and identify the official authorized to appoint an independent investigator.

• Verify whether any grant-funded programs require a specific complaint form, deadline, appeal route, reporting process, or records retention period.

• Verify the availability of interpretation services and whether the previously listed Spanish toll-free number remains active before publishing it.

• Confirm the appropriate complaint form and webpage; the 2017 policy referenced a Tennessee Human Rights Commission form and a DGS-specific process.

• Approve the policy through the County's normal process and coordinate with the updated LEP Plan and Title VI public notice.