

## **Internal Grievance Procedures to Resolve Differences with Individuals with Disabilities**

### NEW YORK PUBLIC RADIO'S COMMITMENT STATEMENT

It is the policy of New York Public Radio ("NYPR") not to discriminate on the basis of disability. NYPR is dedicated to working towards providing equal access to our programs, activities, services and facilities, and we remain committed to eliminating any access barriers for community members with disabilities, including staff, contractors, guests, vendors, listeners and the public.

### APPLICABILITY OF GRIEVANCE PROCEDURES & WHO CAN FILE A GRIEVANCE

NYPR has adopted these internal procedures to ensure the prompt and equitable resolution of any nonemployment complaints that allege discrimination on the basis of disability, including circumstances where individuals have unequal access to NYPR's programs, activities, services or facilities. Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. § 794) prohibits discrimination on the basis of disability in any program or activity receiving Federal financial assistance. Any persons who believe they have been subjected to such discrimination are encouraged to use this internal complaint process to file a grievance. NYPR's Section 504 Coordinator has been designated to examine the law and regulations under Section 504 and coordinate the efforts of NYPR to comply with this law. It is against the law for NYPR to retaliate against anyone who files a grievance or cooperates in the investigation of a grievance.

### PROCEDURES FOR ADDRESSING GRIEVANCES

A written complaint should be submitted via the [Complaint Form](#) according to the instructions provided on the form, unless alternative methods of communication should be arranged as a reasonable accommodation. We encourage individuals to file a complaint within a reasonable period of time after the individual becomes aware that a situation may involve discrimination on the basis of disability.

Once NYPR receives a complaint, it will be routed to NYPR's Section 504 Coordinator, who will review it and contact appropriate NYPR staff to promptly investigate the complaint and determine whether it can be resolved.<sup>1</sup> All communications from NYPR to the person who submitted the grievance will be in writing, or otherwise in a format accessible to the complainant if necessary in the circumstances.

Within 30 calendar days after receipt of the complaint, the Section 504 Coordinator or a designee will communicate to the complainant the result of the investigation and any proposed resolution(s). If, after 30 calendar days from the submission of the complaint NYPR is still investigating the feasibility of possible resolutions, the Section 504 Coordinator or a designee will instead communicate to the complainant the ongoing status of the investigation instead, and will communicate the result of the investigation no later than 30 calendar days later.

If NYPR determines that a proposed accommodation would result in a fundamental alteration in the nature of the NYPR's programs, activities, services or facilities, or is an undue financial or administrative burden, the Section 504 Coordinator will provide the complainant with the reasons for reaching this

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<sup>1</sup> If the Section 504 Coordinator determines that the complaint does not fall under the purview of this policy, but it concerns another area of the business, the Section 504 Coordinator will route the complaint to the appropriate point person and notify the individual who submitted the complaint accordingly.

determination. In this circumstance, the Section 504 Coordinator may also work with the complainant to attempt to identify reasonable accommodations addressing barriers to access and participation.

The person who submitted the grievance may appeal the decision of the Section 504 Coordinator by writing to the General Counsel within 15 days of receiving the Section 504 Coordinator's decision. The General Counsel will communicate a decision in response to the appeal no later than 30 days after it is received.

Grievances will be treated as confidential to the extent practicable.

Records of past grievances and their resolutions will be maintained by the Section 504 Coordinator for at least three years following the date of the resolution of the grievance.