

**RESOLUTION NO. 2026-3507**

**A RESOLUTION OF THE CITY COMMISSION OF THE CITY OF SANFORD, FLORIDA, ADOPTING A DISCRIMINATION GRIEVANCE PROCEDURE FOR THE RECEIPT, INVESTIGATION, AND RESOLUTION OF COMPLAINTS OF DISCRIMINATION AND RETALIATION; DESIGNATING AN EQUAL OPPORTUNITY OFFICER; PROVIDING FOR DISTRIBUTION AND POSTING; PROVIDING FOR SEVERABILITY; PROVIDING FOR CONFLICTS; AND PROVIDING FOR AN EFFECTIVE DATE.**

**WHEREAS**, the Charter of the City of Sanford, Florida (the "City"), vests the City Commission with the authority to exercise the governmental, corporate, and proprietary powers necessary to conduct municipal affairs, including the power to establish administrative policies and procedures for the benefit of the City's employees, applicants for employment, and members of the public who participate in or seek to participate in City services, programs, and activities; and

**WHEREAS**, the United States Congress and the Florida Legislature have enacted laws prohibiting discrimination on the basis of race, color, religion, sex, national origin, age, disability, and other protected characteristics, including, without limitation, Title VI and Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. §§ 2000d et seq. and 2000e et seq.; the Age Discrimination in Employment Act of 1967, as amended, 29 U.S.C. § 621 et seq.; Title II of the Americans with Disabilities Act of 1990, as amended, 42 U.S.C. § 12131 et seq., and its implementing regulation at 28 C.F.R. § 35.107(b); Section 504 of the Rehabilitation Act of 1973, as amended, 29 U.S.C. § 794; and the Florida Civil Rights Act of 1992, as amended, Chapter 760, Florida Statutes (collectively, the "Nondiscrimination Laws"); and

**WHEREAS**, the City is a recipient (or sub-recipient) of financial assistance from the United States Environmental Protection Agency ("EPA"), and as such is subject to the nondiscrimination requirements of 40 C.F.R. Part 7 (implementing Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, the Age Discrimination Act of 1975, and Section 13 of the Federal Water Pollution Control Act Amendments of 1972) and, to the extent the Entity operates any education program or activity funded in whole or in part by EPA, 40 C.F.R. Part 5 (implementing Title IX of the Education Amendments of 1972); and

**WHEREAS**, public entities that employ fifty (50) or more persons are required by 28 C.F.R. § 35.107(b) to adopt and publish grievance procedures providing for the prompt and equitable resolution of complaints alleging discrimination on the basis of disability,

and the City has previously designated an ADA Coordinator in furtherance of that obligation; and

**WHEREAS**, the City Commission finds that the City's employees, applicants for employment, contractors, volunteers, and members of the public are best served by a single, clearly-stated, written procedure of general application — consolidating and superseding, to the extent of any conflict, prior informal or department-level practices — through which complaints alleging discrimination, harassment, or retaliation on the basis of a protected characteristic may be reported, investigated, and resolved promptly, fairly, and without fear of reprisal; and

**WHEREAS**, the City Commission has reviewed, the Discrimination Grievance Procedure attached hereto and incorporated herein as Exhibit A (the "Grievance Procedure"), which sets forth definitions, filing procedures, investigation timelines, interim measures, corrective action, appeal rights, confidentiality protections, and notice of external remedies available to complainants; and

**WHEREAS**, the City Commission finds that adoption of the Grievance Procedure is in the best interest of the health, safety, and welfare of the residents, employees, and visitors of the City and furthers the City's compliance with the Nondiscrimination Laws;

**NOW, THEREFORE, BE IT RESOLVED BY THE CITY COMMISSION OF THE CITY OF SANFORD, FLORIDA, THAT:**

**Section 1. Recitals.** The foregoing recitals are true and correct and are incorporated herein by this reference as findings of the City Commission (Wherefore clauses are incorporated herein).

**Section 2. Adoption of Discrimination Grievance Procedure.** The Discrimination Grievance Procedure attached hereto as Exhibit A is hereby adopted as the official policy and procedure of the City for the receipt, investigation, and resolution of complaints of discrimination, harassment, and retaliation, and is incorporated herein by reference as though fully set forth. The City Manager may further approve forms, applications and amendments to the procedures set forth herein.

**Section 3. Designation of Non-Discrimination Coordinator.** The City Manager, or designee, shall designate a Non-Discriminator Coordinator, who may also serve as the City's ADA Coordinator, to administer the Grievance Procedure, receive and process complaints, and coordinate compliance with the Nondiscrimination Laws. The City Manager is authorized to adopt administrative regulations, forms, and intake procedures consistent with, and reasonably necessary to implement, the Grievance Procedure.

**Section 4. Distribution and Posting.** The City Manager is directed to make the Grievance Procedure available to all City employees, to post the Grievance Procedure

on the City's website and in City Hall and other public buildings in a manner consistent with the City's obligations under the Nondiscrimination Laws, and to provide notice of the Grievance Procedure to applicants for employment and to members of the public participating in City programs, services, and activities.

**Section 5. Severability.** If any section, subsection, sentence, clause, phrase, or portion of this Resolution or the Grievance Procedure adopted hereby is, for any reason, held invalid or unconstitutional by any court of competent jurisdiction, such portion shall be deemed a separate, distinct, and independent provision, and such holding shall not affect the validity of the remaining portions of this Resolution or the Grievance Procedure.

**Section 6. Conflicts.** All resolutions, policies, or parts thereof in conflict with this Resolution are hereby repealed to the extent of such conflict. Nothing in this Resolution or the Grievance Procedure is intended to, nor shall it, diminish any right or remedy available to any person under the Nondiscrimination Laws or any applicable collective bargaining agreement.

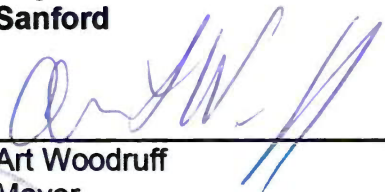
**Section 7. Effective Date.** This Resolution shall take effect immediately upon its adoption.

Passed and adopted this 14<sup>th</sup> day of September, 2026.

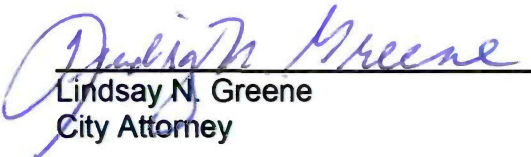
Attest:

  
Traci Houchin, MMC, FCRM  
City Clerk

City Commission of the City of  
Sanford

  
Art Woodruff  
Mayor

For use and reliance of the Sanford City  
Commission only. Approved as to form  
and legality.

  
Lindsay N. Greene  
City Attorney

## **CITY OF SANFORD, FLORIDA NON-DISCRIMINATION POLICY AND GRIEVANCE PROCEDURE**

**I. Policy Statement:** The City of Sanford (“the CITY”) is committed to a workplace, and to programs and activities, free from unlawful discrimination. The CITY does not discriminate on the basis of race, color, religion, sex (including pregnancy, sexual orientation, and gender identity), national origin, disability, or age in its employment practices, nor in any program or activity it operates that receives financial assistance from the United States Environmental Protection Agency (“EPA”). This Policy establishes a single grievance procedure for resolving complaints alleging violations of the laws identified in Section II, while preserving the distinct legal bases, coverage, and complaint routes applicable to each.

The CITY is responsible for coordination of compliance efforts and receipt of inquiries concerning non-discrimination requirements implemented by 40 C.F.R. Parts 5 and 7 (Non-Discrimination in Programs or Activities Receiving Federal Assistance from the Environmental Protection Agency), including Title VI of the Civil Rights Act of 1964, as amended; Americans with Disabilities Act, Section 504 of the Rehabilitation Act of 1973; the Age Discrimination Act of 1975, Title IX of the Education Amendments of 1972; and Section 13 of the Federal Water Pollution Control Act Amendments of 1972.

### **II. Legal Authority and Scope**

- **Employment — Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. § 2000e et seq.** Applies to the Entity's employment practices (hiring, promotion, discipline, compensation, and other terms and conditions of employment) and prohibits discrimination based on race, color, religion, sex, or national origin.
- **Programs and Activities Receiving EPA Assistance — 40 C.F.R. Part 7.** Implements Title VI of the Civil Rights Act of 1964 (race, color, national origin), Section 504 of the Rehabilitation Act of 1973 (disability), the Age Discrimination Act of 1975 (age), and Section 13 of the Federal Water Pollution Control Act Amendments of 1972 (sex, in programs under that Act). Applies to the Entity's programs and activities that receive EPA financial assistance, including as to applicants, participants, and beneficiaries of those programs.
- **Education Programs Receiving EPA Assistance — 40 C.F.R. Part 5.** Implements Title IX of the Education Amendments of 1972 (sex, including pregnancy). Applies only to the extent the Entity operates an education program or activity funded in whole or in part by EPA.

- **Americans with Disabilities Act**-- of 1990, as amended, 42 U.S.C. § 12131 et seq

### **Introduction:**

Title 40 of the Code of Federal Regulations (C.F.R.), Parts 5 and 7, Nondiscrimination in Programs or Activities Receiving Federal Assistance from the Environmental Protection Agency, prohibits discrimination on the basis of race, color, national origin (including limited English proficiency), age, sex, or disability in programs or activities receiving financial assistance from the U.S. Environmental Protection Agency (U.S. EPA). It requires recipients of financial assistance from the U.S. EPA to:

- A. Designate a person to be the Nondiscrimination Coordinator to coordinate efforts to comply with 40 C.F.R., Parts 5 and 7;
- B. Collect, maintain, and provide information showing compliance with 40 C.F.R., Parts 5 and 7;
- C. Adopt grievance procedures that assure the prompt and fair resolution of discrimination complaints alleging violations of 40 C.F.R., Parts 5 and 7; and
- D. Provide continuing and prominent public notice of nondiscrimination on the basis of race, color, national origin, age, sex, or disability, and of the identity and contact information for the Nondiscrimination Coordinator.

As set forth below, it is the City of Sanford, Florida's policy not to discriminate on the basis of several factors, including those in 40 C.F.R., Parts 5 and 7. For definitions of terms, please refer to "Definitions" in Section 7.25 of subpart A in 40 C.F.R., Part 7 and Section 5.105 of Subpart A, in 40 C.F.R. Part 5. In addition, The CITY adopts the following procedures to implement the requirements of 40 C.F.R., Parts 5 and 7.

### **A. Nondiscrimination Coordinators**

The CITY has designated the following Nondiscrimination Coordinator(s):

*Ms. Sharon Kraynik  
City of Sanford  
City Hall  
300 N. Park Avenue  
Sanford, Florida 32771  
Sharon.kraynik@sanfordfl.gov*

### **B. Compliance Information**

1. The CITY shall collect, maintain, and on request of the U.S. EPA, External Civil Rights Compliance Office within the Office of General Counsel (ECRCO), provide the following information to show compliance with 40 C.F.R., Parts 5 and 7: a. A brief description of any lawsuits pending against the CITY that allege discrimination which 40 C.F.R., Parts 5 and 7, prohibits;

b. Racial/ethnic, national origin, age, sex, disability, and disability data, or EPA Form 4700-4 information submitted with the CITY applications for U.S. EPA financial assistance;

c. A log of discrimination complaints that identifies the complaint, the date it was filed, the date the CITY's investigation was completed, the disposition, and the date of disposition;

d. Reports of any compliance reviews conducted by any other agencies; and

e. Data and information specific to certain CITY programs or activities to determine compliance where there is reason to believe that discrimination may exist in a CITY program or activity or to investigate a complaint alleging discrimination in a CITY program or activity.

2. When preparing compliance information, the CITY shall use the racial classifications set forth in 40 C.F.R., Section 7.25, in determining categories of race, color, or national origin;

3. The CITY shall keep records of the compliance information identified in paragraphs (1)(a) through (1)(e), above, for at least three (3) years after completing a project for which the CITY was a recipient of U.S. EPA financial assistance. When any complaint or other action for alleged failure by the CITY to comply with 40 C.F.R., Parts 5 and 7, is brought before the three-year period ends, the CITY shall keep records until the complaint is resolved; and

4. The CITY shall:

a. Give required federal entities access during normal business hours to its books, records, accounts, and other sources of information, including its facilities, as may be pertinent to ascertain compliance with 40 C.F.R., Parts 5 and 7;

b. Make compliance information available to the public upon request; and

c. Assist in obtaining other required information that is in the possession of other agencies, institutions, or persons not under the CITY's control.

### **C. Grievance Procedures**

Any person who believes someone has been subjected to discrimination may file a grievance under this procedure by contacting the Non-Discrimination Coordinator(s). It is against the law for the CITY to retaliate against any person or group because they have exercised rights protected by 40 C.F.R. Parts 5 and 7 or for the purpose of interfering with any such rights.

The CITY adopts the following grievance procedures in order to assure the prompt and fair resolution of complaints that allege a violation by the CITY of 40 C.F.R., Parts 5 and 7:

1. Grievances must be submitted to the CITY Non-Discrimination Coordinator(s) within 180 days of the date the person filing the grievance becomes aware of the alleged discriminatory action. Grievance submissions, in the preferred language of the complainant, can be emailed to [sharonkraynik@sanfordfl.gov](mailto:sharonkraynik@sanfordfl.gov) or mailed to the CITY office address listed below:

*Ms. Sharon Kraynik  
City of Sanford  
City Hall  
300 N. Park Avenue  
Sanford, Florida 32771  
[Sharon.kraynik@sanfordfl.gov](mailto:Sharon.kraynik@sanfordfl.gov)*

2. A complaint must be in writing, containing the name and address of the person filing it and/or the identified representative. The complaint must state the date of the occurrence and the problem or action alleged to be discriminatory and the remedy or relief sought. The complaint shall specify with as much detail as possible: a. The actions or inactions by THE CITY that support an alleged violation of 40 C.F.R., Parts 5 and 7;

b. The alleged discrimination that did or will result from such actions or inactions;

c. The identity of the person(s) harmed or potentially harmed by the alleged discrimination; and

d. The basis for why the action is believed to be discriminatory, and if possible, identifying the sections of 40 C.F.R., Parts 5 and 7, that were allegedly violated.

3. The CITY Non-Discrimination Coordinator(s) (or their designee) will acknowledge receipt of the grievance within 5 days and shall conduct an investigation of the complaint. This investigation may be informal, but it will be thorough, affording all interested persons an opportunity to submit evidence relevant to the complaint. The CITY Non-

Discrimination Coordinator(s) will maintain the files and records of THE CITY relating to such grievances. To the extent possible, and in accordance with applicable law, the CITY's Non-Discrimination Coordinator(s) will take appropriate steps to preserve the confidentiality of files and records relating to grievances and will share them only with those who have a need to know. The CITY's Non-Discrimination Coordinator(s) is/are responsible for making information available to non-employees regarding rights to services, aids, benefits, and participation without regard to race, color, national origin, age, sex, disability, sexual orientation, or marital status. The CITY's Non-Discrimination Coordinator(s) will periodically evaluate the effectiveness of the CITY's efforts to offer such services, aids, benefits and participation opportunities when feasible.

The CITY's Non-Discrimination Coordinator(s) is/are responsible for ensuring that intimidation and retaliation against any person or group because they have exercised rights protected by 40 C.F.R. Parts 5 and 7, or for the purpose of interfering with any such rights, is prohibited and that claims of intimidation and retaliation will be handled promptly if they occur.

The CITY's Non-Discrimination Coordinator(s) will coordinate or facilitate training efforts for THE CITY staff regarding the Department's obligations to comply with non-discrimination statutes, and policies and procedure.

The CITY's Non-Discrimination Coordinator(s) will track all complaints filed against THE CITY under this policy or with the EPA and shall review all complaints on a semi-annual basis to identify and address any patterns or systemic problems. THE CITY's Non-Discrimination Coordinator(s) will also ensure that complainants are updated on the progress of their discrimination complaints filed with THE CITY, if requested. THE CITY's Non-Discrimination Coordinator(s) will promptly inform the complainant as to any determinations made.

The CITY's Non-Discrimination Coordinator(s) is/are responsible for providing notice of this policy and carrying out the process, as prescribed by this policy, of the investigation of nonemployee complaints. THE CITY's Non-Discrimination Coordinator(s) may delegate an investigation to another investigator or designee, if necessary, on a case-by-case basis.

4. The CITY Non-Discrimination Coordinator(s) will issue a written decision on the grievance, based on a preponderance of the evidence, no later than 30 days after its filing, including a notice to the complainant of their right to pursue further administrative or legal remedies. The written decision will include whether discrimination is found and the description of the investigation process.

5. The CITY assures that intimidation and retaliation are prohibited and that claims of intimidation and retaliation will be handled promptly and fairly pursuant to the CITY

Non-discrimination Grievance Policy and Procedures in the same manner as other claims of discrimination.

6. The person filing the grievance may appeal the decision of the CITY Non-Discrimination Coordinator(s) by writing to the City Manager within 15 days of receiving the CITY Non-Discrimination Coordinator(s)'s decision. The City Manager shall issue a written decision in response to the appeal no later than 60 days after its filing.

7. The availability and use of this grievance procedure does not prevent a person from pursuing other legal or administrative remedies, including filing a complaint of discrimination on the basis of race, color, national origin, disability, age, sex or retaliation, in court or with the U.S. Environmental Protection Agency, External Civil Rights Compliance Office. A person can file a complaint of discrimination electronically by writing to TitleVI\_Complaints@epa.gov or by mail or phone at:

U.S. EPA External Civil Rights Compliance Office

Office of General Counsel (Mail Code 2310A)

1200 Pennsylvania Avenue N.W.,

Washington, D.C. 20460

PHONE: (202) 564-3316

The availability and use of this grievance procedure does not prevent a person from filing a complaint of discrimination on the basis of race, color, national origin, disability, age, sex, sexual orientation, or marital status with the state of Florida in accordance with Florida Civil Rights Act.

The CITY will make appropriate arrangements to ensure that individuals with disabilities and individuals with limited English proficiency are provided auxiliary aids and services or language assistance services, respectively, if needed, to participate in this grievance process. Such arrangements may include, but are not limited to, providing qualified interpreters, providing taped cassettes of material for individuals with low vision, or assuring a barrier-free location for the proceedings. The CITY Non-Discrimination Coordinator(s) will be responsible for such arrangements.

#### **D. Notice of Nondiscrimination**

The CITY shall provide continuing notice that it does not discriminate on the basis of race, color, national origin, age, sex, disability, sexual orientation, or marital status in any of its programs or activities. Methods of notice shall accommodate those with impaired vision or hearing. At a minimum, this notice shall be posted in a prominent place in the CITY's offices or facilities and on the CITY's internet homepage. Methods of notice may also include publishing in newspapers and magazines and placing notices in the CITY's publications. Where appropriate or upon request, such notice shall be in a language or

languages other than English. The notice shall identify the current CITY Nondiscrimination Coordinator as the responsible the CITY employee designated to coordinate the CITY's efforts to comply with its obligations under 40 C.F.R., Parts 5 and 7. The text of the notice to be provided under this policy shall read as follows:

**It is the policy of the CITY to not discriminate on the basis of race, color, national origin, age, sex, disability, sexual orientation, or marital status in administration of its programs or activities, and, THE CITY does not intimidate or retaliate against any individual or group because they have exercised rights protected by 40 C.F.R. Parts 5 and 7 or for the purpose of interfering with such rights.**

**The CITY is responsible for coordination of compliance efforts and receipt of inquiries concerning non-discrimination requirements implanted by 40 C.F.R. Parts 5 and 7 (Non-discrimination in Programs or Activities Receiving Federal Assistance from the Environmental Protection Agency), including Title VI of the Civil Rights Act of 1964, as amended; Section 504 of the Rehabilitation Act of 1973, the Age Discrimination Act of 1975, Title IX of the Education Amendments of 1973, Americans with Disabilities Act, and Section 13 of the Federal Water Pollution Control Act Amendments of 1972 (hereinafter referred to collectively as the federal non-discrimination statutes).**

**If you have any questions about this notice or any of THE CITY's non-discrimination programs, policies or procedures, you may contact:**

***Ms. Sharon Kraynik  
City of Sanford  
City Hall  
300 N. Park Avenue  
Sanford, Florida 32771  
Sharon.kraynik@sanfordfl.gov***

**If you believe that you have been discriminated against with respect to a CITY program or activity, you may contact the Nondiscrimination coordinator or go to the City's website.**

Dated: September 1, 2026



CITY OF  
**SANFORD**  
FLORIDA



APPROVED

WS \_\_ RM X

Item No. ADD-ON

**CITY COMMISSION MEMORANDUM 26- ADD-ON  
SEPTEMBER 14, 2026, AGENDA**

**TO:** Honorable Mayor and Members of the City Commission  
**PREPARED BY:** Lindsay N. Greene, City Attorney  
**SUBMITTED BY:** Norton N. Bonaparte, Jr., ICMA-CM, City Manager  
**SUBJECT:** Non-Discrimination Policy & Grievance Procedure; Resolution No. 3507

**SYNOPSIS:**

Requesting to approve the City's proposed **Non-Discrimination Policy and Grievance Procedure** and the accompanying resolution to establish a consistent process for receiving, investigating, and resolving complaints alleging discrimination, harassment, or retaliation.

**FISCAL/STAFFING STATEMENT:**

There is no anticipated fiscal impact associated with adoption of the policy. Administration of the policy will be performed within existing City staffing resources.

**BACKGROUND:**

The City receives financial assistance from the U.S. Environmental Protection Agency (EPA) and, as a recipient of federal financial assistance, is subject to applicable federal nondiscrimination requirements, including those contained in 40 C.F.R. Parts 5 and 7.

The proposed Non-Discrimination Policy and Grievance Procedure establishes a Citywide process for receiving and addressing discrimination and retaliation complaints. The policy also designates a Non-Discrimination Coordinator and addresses compliance information, recordkeeping, public notice, grievance procedures, appeals, and the availability of external administrative and legal remedies.

The draft policy and related documents have been submitted to the EPA's civil rights representatives for review to ensure consistency with applicable federal requirements.

Following completion of the applicable review and approval process, the final policy and related documents will be made available to the public through the City's website and other appropriate means.

**LEGAL REVIEW:**

The proposed resolution and Non-Discrimination Policy and Grievance Procedure have been prepared for City Commission consideration and are subject to review and approval as to form and legality by the City Attorney.

**RECOMMENDATION:**

Staff recommends that the City Commission approve the proposed Non-Discrimination Policy and Grievance Procedure and accompanying resolution.

**SUGGESTED MOTION:**

“I move to approve Resolution No. 3507, adopting the City of Sanford Non-Discrimination Policy and Grievance Procedure.”

Attachments: Resolution No. 3507  
Non-Discrimination Policy and Grievance Procedure