

St. Clair County Illinois
CDBG/CDBG-DR Programs
Section 504
Policies and Procedures Manual



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Purpose

St. Clair County Intergovernmental Grants Department (IGD), Community Development Division (IGD-CD) and its subrecipients, as recipients of federal financial assistance—including [Community Development Block Grant Program \(CDBG\)](#) and [Community Development Block Grant Disaster Recovery \(CDBG-DR\) Funds](#)—must comply with all applicable federal nondiscrimination laws. This policy outlines the procedures and standards that must be followed to ensure compliance with [Section 504, Rehabilitation Act of 1973](#), as amended.

This policy is informed by HUD’s technical assistance resources, including [CPD Monitoring Handbook](#) Exhibit 3-1, which provides a compliance checklist for Section 504 accessibility requirements. It is intended to supplement existing guidance and support consistent implementation across IGD-CD’s programs and activities.

Policy Statement

The Rehabilitation Act of 1973, as amended, was the first major federal law to establish civil rights protections for individuals with disabilities. [Section 504 of Title V](#) prohibits discrimination on the basis of disability in programs and activities that receive federal financial assistance. It requires that individuals with disabilities have meaningful access to participate in and benefit from such programs and services.

Per [28 CFR 41.51\(a\)](#), any recipient of federal funds—whether providing aid, benefits, or services directly or through contractual, licensing, or other arrangements—may not:

- Deny a qualified individual with a disability (as defined in [24 CFR 8.3](#)) the opportunity to participate in or benefit from any aid, benefit, or service;
- Offer a qualified individual with a disability an opportunity to participate in or benefit from an aid, benefit, or service that is not equal to that afforded to others;
- Provide a qualified individual with a disability an aid, benefit, or service that is not as effective in affording equal opportunity to obtain the same result, gain the same benefit, or reach the same level of achievement as that provided to others;
- Give different or separate aid, benefits, or services to individuals with disabilities unless doing so is necessary to ensure that such individuals receive services that are as effective as those provided to others.

In alignment with St. Clair County’s adopted policies under [Resolution No. 1624-10-R](#), IGD-CD affirms its commitment to ensuring that individuals with disabilities are not excluded from participation in any programs, services, or activities.

St. Clair County IGD-CD shall comply with all applicable non-discrimination laws and regulations, including those enforced by the U.S. Department of Housing and Urban Development (HUD) or any other applicable funding source, and shall ensure that no person is excluded from participation in, denied the benefits of, or subjected to discrimination under any program or activity funded in whole or in part by HUD and/or any other applicable funding source. IGD-CD maintains comprehensive internal Non-Discrimination and Affirmative Marketing Policies that guide staff practices and program implementation. This policy is used internally to ensure compliance with applicable laws and funder requirements. All other policies and procedure manuals can be located

at [Intergovernmental Grants | Departments | St. Clair](#). This policy applies to all programs, services, and activities administered or funded by IGD-CD and its subrecipients.

Associated Regulations

Section 504 of the Rehabilitation Act of 1973 ([24 CFR Part 8](#)), as amended, prohibits discrimination on the basis of disability in any program or activity receiving federal financial assistance. It works in coordination with other civil rights laws, including [The Americans with Disabilities Act](#) (ADA) and [The Fair Housing Act](#) (FHA).

While ADA requirements complement Section 504, they do not replace it. Section 504 applies specifically to recipients of federal financial assistance, such as CDBG and CDBG-DR grantees, and governs programmatic access. ADA applies more broadly to public entities and private employers, regardless of funding source.

HUD has announced plans to update its Section 504 regulations to reflect advances in accessible design and assistive technologies.

Designated Section 504 Coordinator

The designated Section 504 Coordinator for IGD-CD is the **Title VI Coordinator** who is responsible for overseeing compliance with Section 504, coordinating reasonable accommodation requests, and managing grievances related to disability access. The coordinator may designate additional staff to assist in fulfilling these responsibilities.

Contact Information

Title VI Coordinator

10 Public Square

Belleville, IL 62223

Fax: 618-236-1190

Phone: 618-825-3266

Email: titlevi@co.st-clair.il.us

The Section 504 Coordinator's responsibilities include, but are not limited to:

- Coordinating efforts to comply with Section 504 requirements.
- Responding to complaints regarding accessibility and effective communication in IGD-CD facilities, services, and programs, and communicating them to the Executive Director.
- Informing IGD staff of Section 504 compliance requirements through training and informational materials.
- Maintaining a current list of community TTY numbers and IGD compliance contacts.
- Disseminating Section 504-related updates and guidance to IGD program staff.
- Designating additional staff to assist in fulfilling these responsibilities, as needed.

Program Accessibility

IGD recognizes that program accessibility does not always require structural modifications. In accordance with Section 504, IGD-CD will ensure that individuals with disabilities have equal

access to CDBG-DR funded programs and services. Accessibility may be achieved through alternative methods such as:

- Providing auxiliary aids and services (e.g., sign language interpreters, Braille materials, large print documents),
- Relocating programs to accessible locations,
- Modifying application procedures or eligibility criteria to remove administrative barriers,
- Offering remote or virtual service options when appropriate.

Structural modifications to facilities are not governed by Section 504 and instead fall under the Americans with Disabilities Act (ADA), which is administered by St. Clair County. IGD-CD defers to the County's ADA Resolution (Resolution No. 1624-10-R) for matters related to physical accessibility, including emergency planning, evacuation procedures, and facility alterations. Requests for structural accommodations should be directed to the County ADA Coordinator.

If alterations have been made to existing non-housing facilities with CDBG or CDBG-DR funds, documentation of those modifications (e.g., plans, specifications, or certifications) must be retained to demonstrate compliance with accessibility requirements under [4 CFR 8.23](#). This requirement aligns with the County's ADA Resolution and HUD monitoring expectations.

Limitations

IGD-CD is not required to take actions that would result in a fundamental alteration of the nature of a program or activity or impose undue financial or administrative burdens, as defined by 24 CFR 8.6.

Outreach to Persons with Disabilities

IGD-CD actively seeks to engage persons with disabilities to ensure equitable access to all CDBG and CDBG-DR programs and services. Information about accessible services, activities, and facilities will be made available to interested individuals — including those with visual, hearing, or other impairments — through multiple formats and communication channels.

Outreach efforts include:

- Hosting public meetings in accessible, ADA-compliant locations, with auxiliary aids and services (e.g., sign language interpreters, Braille or large-print materials, screen reader-compatible formats) available upon request.
- Sharing targeted communications through disability service organizations, local advocacy groups, and accessible media formats.
- Posting notices in formats accessible to individuals with visual or hearing impairments, including digital formats compatible with assistive technologies.
- Collaborating with local disability networks to identify barriers and improve outreach strategies.

These efforts are designed to ensure that persons with disabilities are informed of and able to participate in all aspects of IGD-CD's CDBG and CDBG-DR programs.

Reasonable Accommodation Procedures

IGD-CD is committed to ensuring that individuals with disabilities have meaningful access to its programs, services, and activities in accordance with Section 504 of the Rehabilitation Act.

Individuals requesting a reasonable accommodation should describe the type of support needed to ensure full access to IGD-CD's programs and services. If the need for the accommodation is not immediately apparent, the individual may be asked to explain how the request relates to their disability. There must be a clear connection between the accommodation and the barrier it is intended to address.

IGD-CD will document the request and retain it for future reference. If the requested accommodation cannot be granted, IGD-CD will make every effort to identify and offer an alternative solution that meets the individual's needs.

Requests related to program access or service delivery under Section 504 may be submitted verbally or in writing to the designated contact person listed on the **Notice of Public Meeting**. This can be located on [St. Clair County Illinois > Departments > Intergovernmental Grants > Community Development](#).

Requests related to physical accessibility or employment accommodations under the Americans with Disabilities Act (ADA) should be directed to the County's ADA Coordinator:

ADA Coordinator
#10 Public Square
Belleville, IL 62220
Phone: (618) 825-2260
Email: hrms@co.st-clair.il.us

Grievance and Appeals Procedure

Individuals who believe they have been denied access to a program, service, or reasonable accommodation due to a disability may file a complaint through St. Clair County / IGD-CD's established grievance process. This process ensures that complaints are addressed in a prompt, equitable, and accessible manner, consistent with federal nondiscrimination requirements.

Both Section 504 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act (ADA) of 1990 protect individuals with disabilities from discrimination, but they apply in slightly different contexts:

- Section 504 applies specifically to programs and services that receive federal financial assistance.
- ADA applies more broadly to all public entities, regardless of whether they receive federal funding.

If your concern involves denial of access or accommodation in a federally funded program or service, it may fall under Section 504. If your concern relates to general access to County programs, services, or activities, it may fall under the ADA.

Complaints under either law may be submitted in writing or online. Assistance is available for individuals who need help completing the form or require alternative formats.

Non-Retaliation: St. Clair County and IGD-CD strictly prohibit retaliation against any individual who files a grievance or participates in the grievance process.

Section 504 Complaints

Section 504 complaints will be addressed in accordance with the County's [Title VI Plan](#). These procedures are administrative in nature and do not provide for punitive damages or compensatory relief. However, every effort will be made to resolve complaints promptly and equitably.

Submit written complaints to:

Title VI Coordinator
10 Public Square
Belleville, IL 62223
Phone: 618-825-3266
Fax: 618-236-1190
Email: titlevi@co.st-clair.il.us

- Complaints must be in writing and signed.
- Include the date of the alleged discrimination and a detailed description of the issue.
- Persons who are deaf or hard of hearing may contact the County through TTY.
- Informal mediation may be offered at any stage of the process.

Complainants also have the right to file directly with state or federal agencies or seek private legal counsel.

ADA Complaints

The County's ADA procedure provides a mechanism for individuals to file complaints of disability discrimination under the Americans with Disabilities Act. The ADA Office serves as the liaison between the complainant and the department involved.

ADA complaints may be submitted online or in writing to:

ADA Coordinator
#10 Public Square
Belleville, IL 62220
Phone: 618-825-2260
Email: hrms@co.st-clair.il.us

[St. Clair County Illinois > ADA Information > ADA Complaint Form](#)

- Assistance is available for individuals who need help completing the form.
- Complaints may also be filed with the [Illinois Department of Human Rights](#) .

Recordkeeping

IGD-CD will maintain records necessary to demonstrate compliance with Section 504 of the Rehabilitation Act of 1973. These records may include, but are not limited to:

- Data reflecting the extent to which individuals with disabilities are beneficiaries of CDBG and CDBG-DR funded programs and services
- Documentation of reasonable accommodation requests and the County's responses
- Copies of the Section 504 Self-Evaluation and Transition Plan, which are available upon request
- Records supporting information submitted in HUD performance reports and other required documentation
- Documentation of any alterations made to existing non-housing facilities, including evidence that such alterations made the facilities accessible and usable by persons with disabilities (e.g., construction reports, blueprints, specifications, or certifications).

These records will be reviewed periodically to ensure accuracy and completeness. Failure to maintain adequate documentation may be considered noncompliance with Section 504 recordkeeping requirements.

Self-Evaluation

To support compliance with Section 504 of the Rehabilitation Act of 1973 and HUD accessibility requirements, IGD-CD has developed a Section 504 Self-Evaluation Form for use by recipients and subrecipients of CDBG and CDBG-DR funding.

The self-evaluation process will help identify any physical or procedural barriers to access. If barriers are identified, a Section 504 Transition Plan must be completed and maintained on file to document corrective actions, responsible parties, timelines, and estimated costs.

The self-evaluation will also include a review of:

- Communication practices and availability of auxiliary aids
- Public notice and outreach materials
- Internal policies and grievance procedures
- Facility accessibility and programmatic access
- Consultation with individuals with disabilities or organizations representing them

This process is intended to be proactive and iterative. Evaluations will be conducted periodically and updated as needed to reflect changes in programs, facilities, or regulations. Completed evaluations and any associated transition plans must be retained for monitoring and compliance purposes.

Appendix I

Section 504 Self-Evaluation

Instructions

This self-evaluation is required for compliance with Section 504 of the Rehabilitation Act of 1973 and HUD accessibility requirements. Recipients must complete this evaluation for each CDBG/CDBG-DR-funded project. The evaluation applies to the following three areas:

1. Administrative Offices – Municipal or agency offices administering the program.
2. Public Engagement – Hearings, meetings, application processes, and citizen participation.
3. Funded Infrastructure – Facilities, buildings, or public infrastructure built or improved with CDBG-DR funds.

If any physical or procedural barriers are identified, a Section 504 Transition Plan must be completed and maintained on file.

Section 1: Basic Information

Recipient/ Subrecipient Name	Click or tap here to enter text.
Primary Contact Name and Title	Click or tap here to enter text.
Phone Number	Click or tap here to enter text.
Email Address	Click or tap here to enter text.
Project Site Address	Click or tap here to enter text.
Number of Full-Time Employees	Click or tap here to enter text.

Project Description (brief overview of CBDG/ CDBG-DR-funded activities and target populations)

Click or tap here to enter text.

Section 2: Communication and Public Notice

Applies to: Administrative Offices, Public Engagement

1. What steps have been taken to ensure that all beneficiaries and employees are aware of their rights under Section 504? (Check all that apply)

- Policy statement regarding non-discrimination on the basis of disability is posted in a prominent public area
- Public notices include statements that accommodations for persons with disabilities will be made upon request
- Section 504 rights are discussed during public meetings or included in program outreach materials
- Other (describe below)

Description:

Click or tap here to enter text.

2. Are auxiliary aids or services available upon request? (Check all that apply)

- Large print documents
- Language interpreters TTY/TDD number available
- Assistive listening devices
- Materials in Braille or alternative formats
- Other (describe below)

Description:

Click or tap here to enter text.

3. How are individuals made aware of available accommodations?

Click or tap here to enter text.

Section 3: Policies, Grievances, and Oversight

Applies to: Administrative Offices, Public Engagement, Funded Infrastructure

1. Do your contracts with vendors, engineers, or contractors include requirements to comply with Section 504 and ADA?
 - Yes
 - No
2. Are any internal policies or procedures found to limit access to persons with disabilities?
 - Yes (describe below and include in transition plan)
 - No

Description:

Click or tap here to enter text.

3. If the recipient/ subrecipient has 15 or more full-time employees, complete the following:
 - A Section 504 Coordinator has been designated
 - A written policy of non-discrimination based on disability is in place
 - A grievance procedure has been adopted and is accessible in alternative formats
 - Not ApplicableName of Coordinator:

Section 4: Facility and Infrastructure Accessibility
Applies to: Administrative Offices, Funded Infrastructure

1. Are the municipal/program-related offices accessible?
 - Accessible entrance and parking
 - Restrooms compliant with ADA standards
 - Signage and path of travel are compliant
 - No barriers identified
 - Barriers exist (describe below and include in transition plan)

Description:

Click or tap here to enter text.

2. Is the CDBG/ CDBG-DR-funded project physically accessible?
 - Ramps, sidewalks, paths meet ADA requirements
 - Public spaces (e.g., restrooms, seating) are accessible
 - No barriers identified
 - Barriers exist (describe below)

Description:

Click or tap here to enter text.

If the project involves new construction or substantial alterations of non-housing facilities, attach documentation (e.g., blueprints, construction specifications, or architect certification) demonstrating compliance with ADA and UFAS accessibility standards.

Section 5: Public Participation and Consultation

Applies to: Public Engagement

1. Have persons with disabilities or organizations representing them been consulted during this evaluation?
 Yes (List names or organizations along with dates of consultation below)
 No

List names or organizations along with dates of consultation:

Click or tap here to enter text.

2. Were any changes made to facilities or procedures as a result of consultation?
 Yes (describe below)
 No

Description:

Click or tap here to enter text.

Certification

I certify that this self-evaluation is complete and accurate to the best of my knowledge. Any identified barriers have been documented in the attached Transition Plan or noted with justification for delay or deferral.

Signature:

Click or tap here to enter text.

Authorized Official Name:

Click or tap here to enter text.

Title:

Click or tap here to enter text.

Date:

Click or tap here to enter text.

Revision History

Event	Date
Adopted	October 2025

