

Policy

The Poverello Center, Inc. (TPC) is committed to providing equitable, compassionate services and a welcoming environment free from discrimination across all counties we serve, including Broward, Palm Beach, and Miami-Dade. As a nonprofit serving individuals living with HIV/AIDS and other chronic illnesses, with a focus on the LGBTQ+ community in South Florida, TPC prohibits discrimination in all aspects of employment, volunteer engagement, service delivery (e.g., food pantry distributions, wellness programs, and partnerships), and operations.

This policy complies with:

- Titles II, III, VI, and VII of the Civil Rights Act of 1964, as amended
- Title VIII of the Civil Rights Act of 1968 (Fair Housing Act), as amended
- Section 504 of the Rehabilitation Act of 1973, as amended
- Americans with Disabilities Act of 1990 (ADA), as amended, including Title III protections for public accommodations
- Section 1557 of the Affordable Care Act (prohibiting discrimination in health programs)
- Age Discrimination in Employment Act of 1967, as amended
- Pregnant Workers Fairness Act (2023)
- Florida Civil Rights Act of 1992 (Chapter 760, Florida Statutes)
- Broward County Human Rights Ordinance (Chapter 16½, Broward County Code of Ordinances)
- Palm Beach County Equal Employment Ordinance and Ordinance for Equal Opportunity to Housing and Places of Public Accommodation (prohibiting discrimination based on race, color, religion, national origin, sex, disability, age, marital status, familial status, sexual orientation, and gender identity or expression)
- Miami-Dade County Human Rights Ordinance (Chapter 11A, Miami-Dade County Code of Ordinances)
- Ryan White HIV/AIDS Program requirements (prohibiting discrimination based on HIV status)
- Other applicable federal, state, and local anti-discrimination laws

TPC explicitly prohibits discrimination or harassment based on HIV status (symptomatic or asymptomatic), as well as perceived or associated HIV status.

Procedure

Covered Individuals and Activities

This policy applies to all staff, volunteers, interns, contractors, board members, program participants, clients, applicants, vendors, partners, and guests across Broward, Palm Beach, and Miami-Dade counties. It covers employment decisions (hiring, promotion, termination), volunteer opportunities, client service delivery (including food distributions, vouchers, and partnerships in Palm Beach and Miami-Dade), and access to facilities/events.

Prohibited Behavior

All decisions regarding employment, volunteer service, client eligibility, or program participation shall be made without regard to:

- Race
- Color
- Religion (creed)
- Sex (including pregnancy, childbirth, and related conditions)
- National origin (ancestry)
- Age (40 and older)
- Disability (physical or mental, including HIV/AIDS)
- Marital status
- Familial status
- Sexual orientation
- Gender identity or expression
- Genetic information
- Veteran status
- Political affiliation
- Source of income (where applicable in housing/public accommodations)
- Status as a victim of domestic violence, dating violence, or stalking (where applicable)
- Or any other characteristic protected by federal, state, or local law

Harassment, retaliation against those reporting discrimination, or creation of a hostile environment based on protected characteristics is strictly prohibited.

Complaints and Investigations

- Any allegation of discrimination shall be reported promptly and confidentially to the CEO, COO, or designated their designated Compliance Officer.
- Complaints may be submitted verbally or in writing; anonymous reports are accepted.
- All reports will be investigated promptly, impartially, and thoroughly, with appropriate corrective action if violations are found.
- Retaliation against individuals making good-faith reports or participating in investigations is prohibited and will result in discipline.
- External remedies (e.g., filing with EEOC, Florida Commission on Human Relations, Broward County Human Rights Section, Palm Beach County Office of Equal Opportunity, or Miami-Dade County Commission on Human Rights) are also available.

Training and Communication

- All staff and volunteers receive mandatory training on this policy, cultural competency, and stigma reduction (especially related to HIV, LGBTQ+ identities, and chronic illnesses) during onboarding and annually.
- The policy is posted visibly, included in handbooks, and distributed to clients upon intake across all service areas.

Shared Responsibility

Creating an inclusive environment requires cooperation:

- Supervisors enforce the policy and model respectful behavior.
- All covered individuals report concerns without fear of reprisal.

Resources

- Broward County Human Rights Section (broward.org/humanrights)
- Palm Beach County Office of Equal Opportunity (discover.pbcgov.org/equalopportunity)
- Miami-Dade County Commission on Human Rights (miamidade.gov/humanrights)
- Florida Commission on Human Relations (fchr.myflorida.com)
- U.S. Equal Employment Opportunity Commission (eeoc.gov)
- HHS Office for Civil Rights (hhs.gov/ocr)

Approvals

Staff/Volunteer Signature: _____ **Date:** _____
Manager's Signature: Thomas Pietrogallo **Date:** 12.14.25 **CEO**
Signature: Thomas S. Pietrogallo, MSW, LCSW, MBA **Date:** 12/14/2025 **BOD**
Approved Date: Revised approval pending **Date Established:** Prior to 2019 **Date**
Reviewed/Revised: 12/14/2025