



## TITLE VI PLAN

### POLICY STATEMENT

The City of Griffin is committed to compliance with Title VI of the Civil Rights Act of 1964 and all related regulations and directives. The City of Griffin assures that no person shall on the grounds of race, color, national origin, as provided by Title VI of the Civil Rights Act of 1964, and the Civil Rights Restoration Act of 1987 (P.O. 100.259) be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under and program or activity. The City of Griffin further assures every effort will be made to ensure nondiscrimination under any program or activities, whether or not those programs and activities are federally funded. In addition, the City of Griffin will take reasonable steps to provide meaningful access to services for persons with Limited English Proficiency.

When the City of Griffin distributes federal aid funds to another governmental entity, the City of griffin will include Title VI language in all written agreements and will monitor for compliance.

The City of Griffin's Human Resources Department, in coordination with the Public Works Department is responsible for initiating and monitoring Title VI activities, preparing required reports and other City of Griffin responsibilities as required by 23 Code of Federal Regulation (CFR) 200 and 49 Code of Federal Regulation 21.

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Doug Hollberg  
Chairman, Board of Commissioners

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Date

## **AUTHORITIES**

### **Title VI of the Civil Rights Act of 1964**

Title VI of the 1964 Civil Rights Act provides that no person in the United States shall, on the grounds of race, color, or national origin (including Limited English Proficiency), be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving federal financial assistance (please refer to 23 CFR 200.9 and 49 CFR 21). Related statutes have broadened the grounds to include age, sex, low income, and disability.

### **The Civil Rights Restoration Act of 1987**

Broadened the scope of Title VI coverage by expanding the definition of terms “programs or activities” to include all programs or activities of Federal Aid recipients, sub-recipients, and contractors, whether such programs and activities are federally assisted or not.

### **Federal Aid Highway Act of 1973**

No person shall on the ground of sex be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal assistance under this title or carried on under this title.

**Age Discrimination Act of 1975** No person in the United States shall, on the basis of age, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under, any program or activity receiving federal financial assistance.

### **Americans With Disabilities Act of 1990 (ADA & ADAAA)**

No qualified individual with a disability shall, by reason of his/her disability, be excluded from participation in, be denied the benefits of, or be subjected to discrimination by a department, agency, special purpose district or other instrumentality of a state or local government.

### **Section 504 of the Rehabilitation Act of 1973**

No qualified individual with a disability shall, solely by reason of his/her disability, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity that receives or benefits from federal financial assistance.

**EO13166:** Improving Access to Services for Persons with Limited English Proficiency.

## **GOALS AND OBJECTIVES**

The primary goals and objectives of the City of Griffin’s Title VI Program are:

- To assign roles, responsibilities, and procedures for ensuring compliance with Title VI of the Civil Rights Act of 1964 and related regulations and directives;
- To ensure that people affected by the City of Griffin’s programs and projects receive the services, benefits, and opportunities to which they are entitled without regard to race, color, national origin, age, sex, or disability;
- To prevent discrimination in the City’s programs and activities, whether those programs and activities are federally funded or not;

- To establish procedures for identifying impacts in any program, service, or activity that may create illegal adverse impact on any person because of race, color, national origin, age, sex, or disability; or on minority populations, low income populations, the elderly, and all interested persons and affected Title VI populations;
- To set forth procedures for filing and processing complaints by persons who believe they have been subjected to illegal discrimination under Title VI in the City's services, programs, or activities.

## **ADMINISTRATION – GENERAL**

Kenny Smith, the City Manager, shall have lead responsibility for ensuring the proper implementation of the City's Title VI Program.

Miles Neville, Director of Human Resources, shall serve as the Title VI Coordinator. He shall be responsible for the administration of the program to include the formal complaint procedure.

Department Heads shall be responsible for ensuring non-discrimination of their programs and activities. Department Heads may designate a liaison to ensure compliance within their program areas. The liaison shall provide program monitoring, data collection and reporting, as well as, dissemination of Title VI information within their department.

## **TRAINING**

Training will be conducted by the Title VI Coordinator or his designee. Title VI training will be included as part of an employee's EEO training. Title VI information will be listed in the Employee Handbook (2015 revised edition).

## **SUBCONTRACTS AND VENDORS**

All subcontractors and vendors who receive payments from the City of Griffin where funding originates from any federal assistance are subject to the provisions of Title VI of the Civil Rights Act of 1964 as amended.

Written contracts shall contain non-discrimination language, either directly or through the bid specification package which becomes an associated component of the contract.

**The following Title VI statement is listed on the website and in all bid documents for all bidders of contracts with the City of Griffin:**

*The City of Griffin, Georgia, in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d to 2000d-4, as amended by The Civil Rights Restoration Act of 1987, hereby notifies all bidders that no person shall on the grounds of race, color, national origin, sex, age, and handicap/disability, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity conducted by the City regardless of whether those programs, services, and activities are federally-funded or not. Further, it will affirmatively ensure that in any contract entered into pursuant to this advertisement, disadvantaged business enterprises as defined at 49 CFR Part 23 will be afforded*

*full opportunity to submit bids in response to this invitation and will not be discriminated against on the grounds of race, color, national origin, sex, age, handicap/disabled in consideration for an award.*

## **ADA/504 STATEMENT**

Section 504 of the Rehabilitation Act of 1973 (Section 504), the Americans with Disabilities Act of 1990 (ADA) and related federal and state laws and regulations forbid discrimination against those who have disabilities. Furthermore, these laws require federal aid recipients and other government entities to take affirmative steps to reasonably accommodate the disabled and ensure that their needs are equitably represented in transportation programs, services and activities.

The city will make every effort to ensure that its facilities, programs, services, and activities are accessible to those with disabilities. The county/city will make every effort to ensure that its advisory committees, public involvement activities and all other programs, services and activities include representation by the disabled community and disability service groups.

Questions, concerns, comments or requests for accommodation should be made to:

**Miles Neville, Director of Human Resources**  
**Title VI Coordinator**  
**City of Griffin**  
**PO Box T**  
**Griffin, Georgia 30224**  
**Phone – (770)233-2923**  
**Email – mneville@cityofgriffin.com**

## **LIMITED ENGLISH PROFICIENCY (LEP)**

On August 11, 2000, President William J. Clinton signed an executive order, Executive Order 13166: Improving Access to Service for Persons with Limited English Proficiency, to clarify Title VI of the Civil Rights Act of 1964. It had as its purpose, to ensure accessibility to programs and services to otherwise eligible persons who are not proficient in the English language. This executive order stated that individuals who do not speak English well and who have a limited ability to read, write and speak, or understand English are entitled to language assistance under Title VI of the Civil Rights Act of 1964 with respect to a particular type of service, benefit, or encounter. These individuals are referred to as being limited in their ability to speak, read, write, or understand English, hence the designation, “LEP,” or Limited English Proficient. The Executive Order states that: “Each federal agency shall prepare a plan to improve access to its federally conducted programs and activities by eligible LEP persons. Each plan shall be consistent with the standards set forth in the LEP Guidance, and shall include the steps the agency will take to ensure that eligible LEP persons can meaningfully access the agency’s programs and activities.”

This plan uses the recommended four (4) factor analysis to determine the level and extent of language assistance needed to sufficiently ensure meaningful access to City of Griffin’s programs and activities.

Factor 1 – The number or proportion of people with LEP served.

Factor 2 – The frequency that LEP people come in contact with City of Griffin programs and activities.

Factor 3 – Importance of the service provided by the program or activity.

Factor 4 – Resources available to the City of Griffin to ensure access to the programs and activities.

The City of Griffin has determined that approximately 4% of the population is Hispanic. There are two (2) service sectors with which a Hispanic citizen will most likely use our services:

1. Hispanic citizens wishing to utilize city utilities such as water and power (Customer Service Department).
2. Hispanic citizens wishing to obtain an occupational certificate (business license)

The City has numerous bilingual (English/Spanish) employees who are used to translate when a language barrier is apparent and necessary. Our Customer Service Department has two employees on staff who are fluent in Spanish. We have had no need/request to use a language interpreter when someone applies for a business license.

Our Title VI Plan, Complaint Procedures and Complaint Form are listed on our website in both English and Spanish. Any request for the language translation of documents will be reviewed and accommodated if the accommodation is deemed reasonable and necessary.