

CITY OF BREMERTON Public Works & Utilities		Title VI Policy
POLICY INDEX Public Works 6-10-11	EFFECTIVE DATE: 1/2/12 REVIEW DATE: REVISED DATE:	APPROVED 

Policy:

City of Bremerton assures that no person shall on the grounds of race, color, national origin, or sex, as provided by Title VI of the Civil Rights Act of 1964 and as amended, and the Civil Rights Restoration Act of 1987 (P.L. 100.259) 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 from the Washington State Department of Transportation.

City of Bremerton further assures every effort will be made to ensure nondiscrimination in all of its programs and activities, whether those programs or activities are federally funded or not.

In the event City of Bremerton distributes federal aid funds to another governmental entity or other sub-recipient, City of Bremerton will include Title VI language in all written agreements and will monitor for compliance.

City of Bremerton's Office of the Title VI Coordinator is responsible for initiating and monitoring Title VI activities, preparing required reports and other City of Bremerton responsibilities as required by 23 CFR and 49 CFR 21.

DOT 140-561
10/2015

Procedure:

The attached non-discrimination agreement is the City's Title VI plan as required by 23 Code of Federal Regulation (CFR) 200 and 49 Code of Federal Regulation 21, as administered by the Washington State Department of Transportation. See Chapter 28 of the WSDOT Local Agencies Guidelines, <http://www.wsdot.wa.gov/publications/manuals/fulltext/M36-63/Lag28.pdf>.

The program requirements and how each requirement is met is identified below:

The recipient shall:

1. Issue a policy statement, signed by the head of the recipient, which expresses its commitment to the nondiscrimination provisions of Title VI. The policy statement shall be circulated throughout the recipient's organization and to the general public. Such information shall be published where appropriate in languages other than English.

Non-discrimination statements are included in this policy, the City's Non-Discrimination Agreement, and included in BMC 2.28.010 (Equal Employment Opportunity Program).

2. Take affirmative action to correct any deficiencies found by WSDOT or the United States Department of Transportation (USDOT) within a reasonable time period, not to exceed 90 days, in order to implement Title VI compliance in accordance with this agreement. The head of the recipient shall be held responsible for implementing Title VI requirements.

The City's Title VI/Civil Rights Coordinator shall work with City leadership to identify roles, responsibilities and corrective actions at such time any deficiencies are identified.

3. Designate a civil rights coordinator who has a responsible position in the organization and easy access to the head of the recipient. The civil rights coordinator shall be responsible for initiating and monitoring Title VI activities and preparing required reports.

Per the Title VI Program Specialist at WSDOT, the term "Title VI Coordinator" and "Civil Rights Coordinator" are synonymous. The City's Title VI/Civil Rights Coordinator is the City Engineer, Tom Knuckey, PE.

4. The civil rights coordinator shall adequately implement the civil rights requirements.

Per the Title VI Program Specialist at WSDOT, there are no additional Civil Rights requirements other than the Title VI program requirements outlined in the Non-Discrimination Agreement, and clarified in this policy.

5. Process complaints of discrimination consistent with the provisions contained in this agreement. Investigations shall be conducted by civil rights personnel trained in discrimination complaint investigation. Identify each complainant by race, color, national origin or sex, the nature of the complaint, the date the complaint was filed, the date the investigation was completed, the disposition, the date of the disposition, and other pertinent information. A copy of the complaint, together with a copy of the recipient's report of investigation, will be forwarded to WSDOT's Office of

Equal Opportunity (OEO) within 10 days of the date the complaint was received by the recipient.

As stated in Attachment 1 to the Non-Discrimination Agreement, it is the policy of the City that any Title VI or Civil Rights complaint will be forwarded to the City's Human Resources Division and Legal Department for administration and complaint investigation.

6. Collect statistical data (race, color, national origin, sex) of participants in, and beneficiaries of the Transportation programs and activities conducted by the recipient.

This information will be included in the Annual Reports submitted to WSDOT.

7. Conduct Title VI reviews of the recipient and sub-recipient contractor/consultant program areas and activities. Revise where applicable, policies, procedures and directives to include Title VI requirements.

Title VI reviews consist of confirming that contractors and consultants working on Federal Aid projects have a non-discrimination policy in place.

8. Attend training programs on Title VI and related statutes conducted by WSDOT OEO.

The Title VI/Civil Rights Coordinator and Project Assistants will attend training when available.

9. Prepare a yearly report of Title VI accomplishments for the last year and goals for the next year. This report is due one year from the date of approval of the Nondiscrimination Agreement and then annually on the same date.

The two reports will be completed and submitted together before December 31st of each year.

- a) Annual Work Plan – Outline Title VI monitoring and review activities planned for the coming year; state by which each activity will be accomplished and target date for completion.

The annual work plan will identify outreach to disadvantaged individuals based on demographic data. The threshold for outreach consideration is 5% of the population.

10. Accomplishment Report – List major accomplishments made regarding Title VI activities. Include instances where Title VI issues were identified and discrimination was prevented. Indicate activities and efforts the Title VI Coordinator and program area personnel have undertaken in monitoring Title VI. Include a description of the scope and conclusions of any special reviews (internal or external) conducted by the Title VI Coordinator. List any major problem(s) identified and corrective action taken. Include a summary and status report on any Title VI complaints filed with the recipient.

The Accomplishment Report will be completed with the annual report.