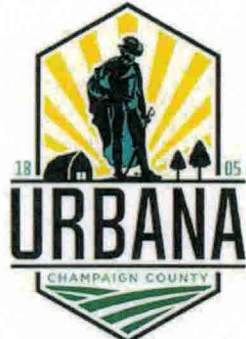




# URBANA, OHIO

# TITLE VI POLICY

*Adopted November 5, 2020*



**CITY OF  
URBANA**

*Kerry Brugger*  
\_\_\_\_\_  
**Kerry Brugger, Director of Administration**

*11/5/2020*  
\_\_\_\_\_  
**Date**

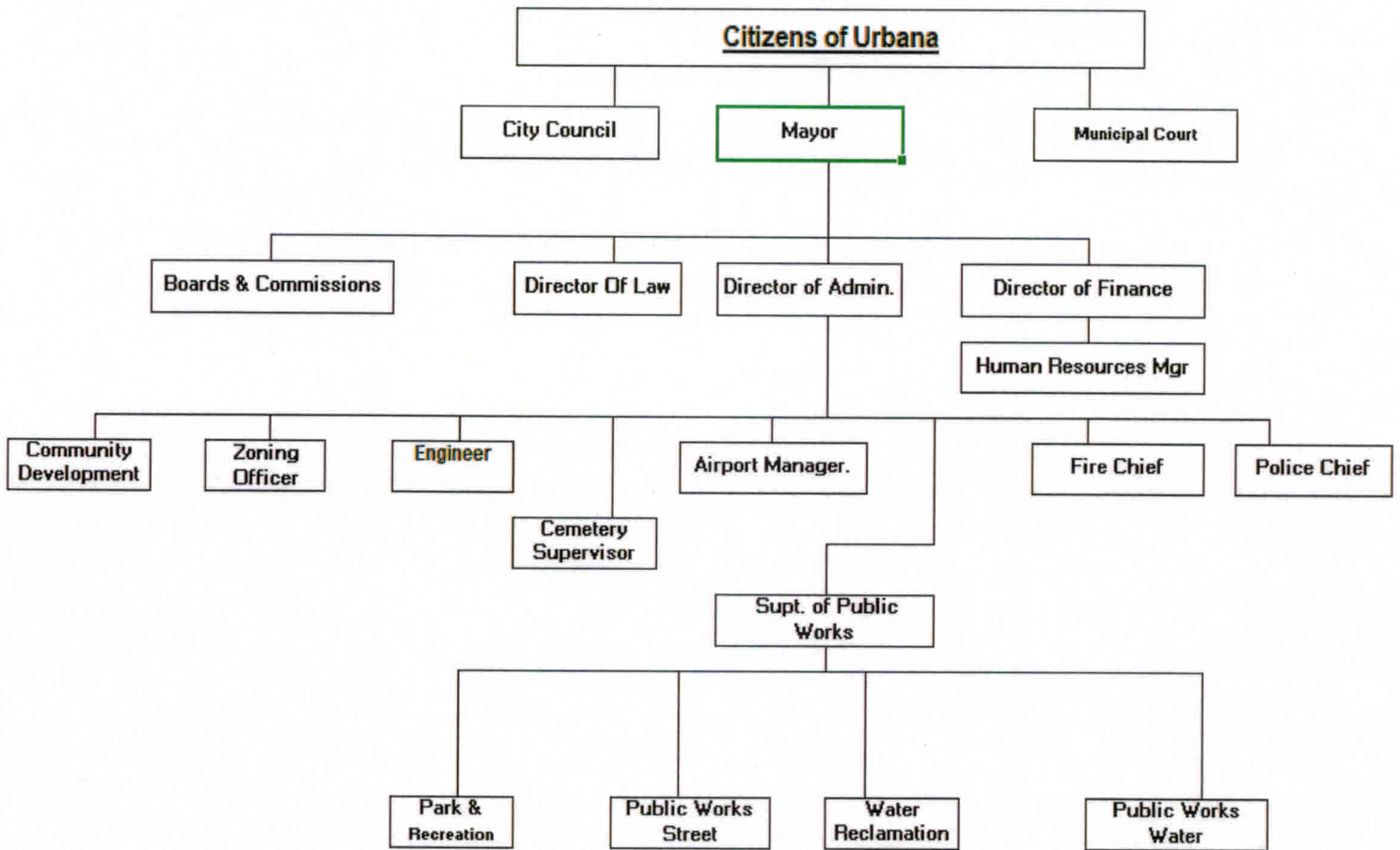


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# City of Urbana Organizational Structure



# Title VI Policy

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## Policy Statement

Title VI of the Civil Rights Act of 1964 (Title VI) prohibits discrimination based on race, color and national origin in programs and activities of any entity that receives federal financial assistance.

Title VI provides: *“No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.”* (42 USC 2000d)

After Title VI was signed into law, additional laws were passed that expanded nondiscrimination protection to include disability, sex, age, low income status and limited English proficiency.

This Plan was developed to guide the City of Urbana in its administration and management of Title VI Programs and activities.

## Title VI Coordinator Contact Information

Liela Anderson, Human Resources Manager  
205 South Main Street - PO Box 747  
Urbana, Ohio 43078  
(937) 652-4313

## Notifying the Public of Rights Under Title VI

The City of Urbana operates its programs and services without regard to race, color, national origin, disability, sex, age, low-income status or limited English proficiency in accordance with Title VI of the Civil Rights Act of 1964 and its related statutes. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the City of Urbana.

For more information on the City of Urbana’s Title VI/Nondiscrimination Program and the procedures to file a complaint, contact Liela Anderson, Title VI Coordinator at 937-652-4313 or [liela.anderson@ci.urbana.oh.us](mailto:liela.anderson@ci.urbana.oh.us). You may also visit our Business Office at 225 South Main Street, Urbana, Ohio 43078. For more information, visit [www.urbanaohio.com](http://www.urbanaohio.com).

## Dissemination

The Title VI Notice to the Public will be posted in the common area bulletin boards located at the City of Urbana Municipal Building and the City website, required Title VI language will be included in request for proposals, bid documents, contracts and real estate instruments. Additional information relating to nondiscrimination obligation can be obtained from the Title VI Coordinator.

All employees will be trained, provided a copy of the Title VI Plan and will sign the Acknowledgement of Receipt (see Appendix A). New hires will do the same in their new hire orientation.

## Filing a Complaint

Any person who believes that he or she has been excluded from participation in or has been denied the benefits or services of any City of Urbana programs or activities based on race, color, national origin, disability, sex, age, income status or limited English proficiency may file a complaint of discrimination under Title VI and its related statutes.

Items to include in a complaint procedure:

- A complaint must be filed no later than 180 days after the date of the last instance of alleged discrimination
- Complaints should be in writing and signed by the complainant
- Complaints should contain the following information:
  - » Contact information
  - » Basis of the complaint (e.g. – race, color, national origin)
  - » Person/Department alleged to have discriminated
  - » Date(s) the alleged discrimination occurred
  - » Explanation of what happened

The Title VI Complaint Form (see Appendix B) may be used to submit the complaint information. The complaint may be filed in writing with the City of Urbana at the following address through the US Postal Service to ensure that all written correspondence can be tracked easily:

City of Urbana  
Title VI Coordinator  
205 S Main St - PO Box 747  
Urbana, Ohio 43078

For complaints originally submitted by facsimile or email, an original, signed copy of the complaint must be mailed to the Title VI Coordinator as soon as possible, but no later than 180 days from the alleged date of discrimination.

A complaint may be filed directly with the Ohio Department of Transportation online at <http://www.dot.state.oh.us/Divisions/ODI/EqualOpportunity/Pages/TitleVI.aspx> or by using the following contact information: Ohio Department of Transportation, Office of Equal Opportunity, 1980 West Broad Street, Mail Stop 3270, Columbus, Ohio 43223; 614.466.3264; Toll-Free: 1.877.845.5058; Ohio Relay Service: 1.800.750.0750.

A complaint may be filed directly with the Federal Highway Administration online at <https://www.fhwa.dot.gov/civilrights/file/titlevi.cfm> or by using the following contact information: Federal Highway Administration, Office of Civil Rights, 1200 New Jersey Avenue, SE, 8<sup>th</sup> Floor E81-105, Washington, D.C. 20590; 202.366.0693; [FHWA.TitleVIcomplaints@dot.gov](mailto:FHWA.TitleVIcomplaints@dot.gov).

If information is needed in another language contact Liela Anderson, at 937-652-4313 or at [Liela.anderson@ci.urbana.oh.us](mailto:Liela.anderson@ci.urbana.oh.us).

*“Para Española: Liela Anderson en [liela.anderson@ci.urbana.oh.us](mailto:liela.anderson@ci.urbana.oh.us).”*

### **What happens to the complaint once is it submitted?**

All complaints alleging discrimination will be directly addressed. The City shall also provide appropriate assistance to complainants, including those persons with disabilities, or who are limited in their ability to communicate in English. Additionally, the City of Urbana shall make every effort to address all complaints in an expeditious and thorough manner.

A letter acknowledging receipt of complaint will be mailed within seven days (Appendix C) to the complainant. The City of Urbana has (30) days to investigate the complaint. If more information is needed to resolve the case, the City of Urbana may contact the complainant. The complainant has (15) business days from the date of the letter to send requested information to the investigator assigned to the case. Please note that in responding to any requests for additional information, a complainant's failure to provide the requested information may result in the administrative closure of the complaint. If the investigator is not contacted by the complainant or does not receive the additional information within (15) business days, the Agency can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue his/her case.

### **How will the complainant be notified of the outcome of the complaint?**

The City of Urbana will send a final written response letter (see Appendix D or E) to the complainant. In the letter notifying complainant that the complaint is not substantiated (Appendix E), the complainant is also advised of his or her rights to: 1) appeal within seven calendar days of receipt of the final written decision from the City of Urbana, and/or 2) file a complaint externally with the Ohio Department of Transportation and/or the FHWA. Every effort will be made to respond to Title VI complaints within 60 working days of receipt of such complaints, if not sooner.

# APPENDIX A

## Acknowledgement of Receipt of Title VI Plan

The City of Urbana acknowledges that it is a sub-recipient of federal funds through the Ohio Department of Transportation (ODOT).

As such, the City of Urbana understands it must comply with Title VI of the Civil Rights Act of 1964 (Title VI) and related statutes, to ensure that no person on the ground of race, color, national origin, disability, sex, age, low-income status or limited English proficiency, is excluded from participation in, denied the benefits of, or otherwise subjected to discrimination under any of its programs, services or activities.

I hereby acknowledge the receipt of City of Urbana's Title VI Plan. I have read the plan and am committed to ensuring that no person, on the ground of race, color, national origin, disability, sex, age, low-income status or limited English proficiency be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any of the City of Urbana's programs or activities.

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Employee Signature

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Print your name

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Date

**APPENDIX B**  
**Title VI Complaint Form**

**Complainant Name:** \_\_\_\_\_  
Address: \_\_\_\_\_ City,  
state, zip code: \_\_\_\_\_ Telephone  
number: (home) \_\_\_\_\_ (cell) \_\_\_\_\_ (work) \_\_\_\_\_ **Are you filing  
this complaint on your own behalf?** Yes \_\_\_ No \_\_\_ If no, please indicate the name of the person  
for whom you are filing and why you have filed for a third party:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**Please indicate why you believe the alleged discrimination occurred:**

Race  Color  National Origin (*Race, Color, and National Origin fall under Title VI of the Civil Rights Act of 1964*)

Gender/Sex  Age  Disability  Low-Income Status  Limited English Proficiency

**Date and place of alleged discriminatory actions.** Please include earliest date and most recent date of discrimination: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**Please describe the circumstances of the alleged discrimination.** Describe as clearly as possible what happened and why you believe you were discriminated against based on your protected status (e.g., race, color, national origin, etc.): \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**Were there any witnesses to your alleged discrimination?** Yes \_\_\_ No \_\_\_ If yes, provide their name(s) and phone number(s): \_\_\_\_\_

**What remedy are you requesting?** Please be specific: \_\_\_\_\_  
\_\_\_\_\_

**Have you filed, or intend to file a charge or complaint regarding the matters raised in this complaint with any other agencies or courts (federal, state, or local)?** Yes \_\_\_ No \_\_\_ If you have already filed a charge, or complaint please provide the following: Agency/Court: \_\_\_\_\_

Date filed: \_\_\_\_\_

Address: \_\_\_\_\_

Case Number: \_\_\_\_\_ Attorney Name: \_\_\_\_\_

Status of case: \_\_\_\_\_ Attorney Phone Number: \_\_\_\_\_

**Please provide any additional information that you believe is relevant to this complaint; attach additional documentation which supports your allegations if needed.**

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

**Sign and date this form and send all documents to:**  
CITY OF URBANA – TITLE VI COORDINATOR  
205 SOUTH MAIN STREET or PO BOX 747  
URBANA, OHIO 43078

**Letter Acknowledging Receipt of Complaint**

Date

Name  
Address  
City, Ohio ZipCode

Dear Name:

This letter is to acknowledge receipt of your complaint against the City or Urbana alleging

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An investigation will begin shortly. If you have additional information you wish to convey or questions concerning this matter, please feel free to contact this office by telephoning 937-652-4313, or write to me at this address. Your complaint will be processed in accordance with the Federal Highway Administration guidelines.

Liela Anderson, Title VI Coordinator  
City of Urbana  
205 South Main Street  
Urbana, Ohio 43078

Sincerely,

Liela Anderson, Title VI Coordinator



**Letter Notifying Complainant that the Complaint Is Substantiated**

Date

Name

Address

City, State Zip Code

Dear Name:

The matter referenced in your letter of \_\_\_\_\_ (date) against the City of Urbana alleging Title VI violation has been investigated.

(An/Several) apparent violation(s) of Title VI of the Civil Rights Act of 1964, including those mentioned in your letter (was/were) identified. Efforts are underway to correct these deficiencies.

Thank you for calling this important matter to our attention. You were extremely helpful during our review of the program. You may be hearing from this office, or from federal authorities, if your services should be needed during the Ohio Department of Transportation complaint process.

Sincerely,

Liela Anderson, Title VI Coordinator  
City of Urbana  
205 South Main Street  
PO Box 747  
Urbana, Ohio 43078

## Letter Notifying Complainant that the Complaint Is Not Substantiated

Date

Name

Address

City, State Zip Code

Dear Name:

The matter referenced in your complaint of \_\_\_\_\_ (date) against the City of Urbana has been investigated.

The results of the investigation did not indicate that the provisions of Title VI of the Civil Rights Act of 1964 had in fact been violated. As you know, Title VI prohibits discrimination based on race, color, or national origin in any program receiving federal financial assistance.

The City of Urbana has analyzed the materials and facts pertaining to your case for evidence of its failure to comply with any of the civil rights laws. There was no evidence found that any of these laws have been violated.

I therefore advise you that your complaint has not been substantiated, and that I am closing this matter in our files.

You have the right to 1) appeal within seven calendar days of receipt of this final written decision from the Director of Administration and/or 2) file a complaint externally with the Ohio Department of Transportation or the Federal Highway Administration:

<http://www.dot.state.oh.us/Divisions/ODI/EqualOpportunity/Pages/TitleVI.aspx>

Ohio Department of Transportation, Office of Equal Opportunity, 1980 West Broad Street, Mail Stop 3270, Columbus, Ohio 43223; 614.466.3264; Toll-Free: 1.877.845.5058; Ohio Relay Service: 1.800.750.0750.

<https://www.fhwa.dot.gov/civilrights/file/titlevi.cfm> or by using the following contact information:

Federal Highway Administration, Office of Civil Rights, 1200 New Jersey Avenue, SE, 8<sup>th</sup> Floor E81-105, Washington, D.C. 20590; 202.366.0693; [FHWA.TitleVIcomplaints@dot.gov](mailto:FHWA.TitleVIcomplaints@dot.gov).

Thank you for taking the time to contact us. If I can be of assistance to you in the future, do not hesitate to call me.

Sincerely,

Liela Anderson, Title VI Coordinator

## APPENDIX F

### List of Investigations, Lawsuits and or Complaints

Date    Summary    Status    Action  
(month, day, year) (basis, color, race)

Investigations    NONE FROM May 29, 2020 thru December 31, 2020

- 1.
- 2.

Lawsuits    NONE FROM May 29, 2020 thru December 31, 2020

- 1.
- 2.

Complaints    NONE FROM May 29, 2020 thru December 31, 2020

- 1.
- 2.

Please Use other pages or attachments if necessary to explain.