



CITY OF GRIFFIN, GEORGIA

Title VI of the Civil Rights Act– Policy

The City of Griffin hereby gives public notice of its policy to uphold and assures full compliance with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, and all related statutes. Title VI and related statutes prohibiting discrimination in federally-assisted programs require that no person in the United States of America shall, on the grounds of race, color, religion, or national origin be excluded from the participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving Federal assistance. The City of Griffin further assures every effort will be made to ensure non-discrimination in all its programs and activities, whether those programs and activities are federally funded or not.

The Civil Rights Restoration Act of 1978, broadened the scope of Title VI coverage by expanding the definition of terms “programs or activities” to include all programs and activities of Federal Aid recipients, sub-recipients, and contractors/consultants, whether such programs are federally assisted or not.

Federal aid funds distributed by the City of Griffin to another governmental entity, or to subcontractors and vendors are subject to the provisions of Title VI. Written contracts shall contain non-discrimination language either directly or through the bid specification package which becomes an associated component of the contract.

Title VI of the Civil Rights Act Grievance Procedures

This grievance procedure is established to meet the requirements of Title VI of the Civil Rights Act. It may be used by anyone who wishes to file a complaint alleging discrimination on the basis of race, color, religion or national origin being excluded from the participation in, denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving Federal assistance.

The complaint should be in writing and contain information about the alleged discrimination such as the name, address, phone number, email address of complainant, location(s), date(s), and description(s) of the incident. Allegations received by telephone will be reduced to writing and provided to the complainant for him or her to supply additional information or revise if needed. The complainant shall then provide the completed final complaint form to the Human Resources Director, who serves as the Title VI Coordinator for processing. Alternative means of filing complaints, such as personal interviews or a tape recording of the complaint will be made available for persons with disabilities, upon request.

To allow time to file first with the City and then externally with an appropriate outside agency or court as the complainant chooses, any complaint to the City should be filed promptly and must be filed no

later than one hundred eighty (180) calendar days after the alleged discrimination occurred. If the complainant is not satisfied with the Human Resources Director's disposition, the complainant may still file externally within any applicable statute of limitations.

If a complaint is filed with the City and is also filed externally during the same time, the external complaint supersedes the internal complaint filing. Accordingly, the City's complaint procedures will be suspended pending the outcome of the external complaint. Any complaint shall be submitted to:

Stephanie Woods, Human Resources Director
100 S. Hill Street, Suite 400
Griffin, GA 30224
770-233-2923
swoods@cityofgriffin.com

Upon receipt of a complaint against the City involving Federal Highway Administration funds, it will be forwarded to the appropriate State agency, the Georgia Department of Transportation, for proper disposition pursuant to its procedures.

The Human Resources Director shall conduct an internal investigation which shall be completed within thirty (30) workdays of receipt of a complaint. Please note that in the event of unforeseen circumstances, an investigation may take more than thirty (30) workdays. Subsequently, the Human Resources Director will inform the complainant in writing, and where appropriate, in a format that is accessible to the complainant, such as large print, Braille, or audiotape, of its disposition, including any findings of fact and any action(s) to be taken.

The following are the disposition outcomes of a complaint:

Sustained complaint: If the complaint is substantiated, policy and procedures prohibiting discrimination will be reviewed with the offender(s). Appropriate disciplinary action and/or training will be taken pursuant to the City's personnel policy;

Un-sustained complaint: If there is insufficient evidence to either prove or disprove the allegation(s), all parties to the complaint will be informed of the reason(s) for this disposition;

Unfounded complaint: If it is determined that an act reported did not in fact occur, a finding of "unfounded" shall be made;

Exonerated complaint: If it is determined that an act reported did in fact occur, but was lawful and proper within the guidelines established herein, a finding of "exonerated" shall be made; and

Dismissed complaint: If the complainant requests to withdraw the complaint, fails to respond to repeated requests for additional information needed to process the complaint, or the complainant cannot be located after reasonable attempts.

If the complainant is not satisfied with the disposition by the Human Resources Director, an appeal process is available. An appeal request for review of a disposition of unlawful denial of access or

accommodation must be filed, in writing, within thirty (30) calendar days of the disposition of the complaint with the City Manager directly. The written appeal must include the complainant's name, address, telephone contact number, and the reason why the complainant believes the disposition was inappropriate. An appeal request shall be submitted to:

The City of Griffin
Mrs. Jessica O'Connor, City Manager
100 South Hill Street
Griffin, GA 30224
jocconnor@cityofgriffin.com

The City Manager, or her designee, will set a mutually agreed-upon time and place for the review process with the complainant-appellant within thirty (30) working days of the request. The complainant-appellant may submit documents or other information to be included with the record and considered in the review process.

A person may also file a complaint directly with the Federal Highway Administrations' Civil Rights Specialist in the Atlanta, Georgia Regional Office or with the Department of Justice. Such formal complaint must be filed within one hundred eighty (180) calendar days of the alleged occurrence or when the alleged discrimination became known to the complainant. Likewise, if a complainant is not satisfied with the result of the City of Griffin's investigation, he or she may appeal to the United States Department of Justice. Appeals must be filed within one hundred eighty (180) days after the City of Griffin's final resolution.

Complaints will be maintained in a complaint log that will show the identifying information type, and the status of each complaint filed. When any investigation is concluded, the Human Resources Director will keep a copy of the report on permanent file.

LIMITED ENGLISH PROFICIENCY (LEP)

The City of Griffin is committed to providing quality services to all citizens, including those who do not speak English as their primary language and who have the limited ability to read, speak, write, or understand English. These individuals may be considered "LEP," or Limited English Proficient, and may be entitled to language assistance.

As a recipient of Federal Transportation Funding, the City of Griffin must take reasonable steps to ensure meaningful access to its programs and activities by LEP persons. This plan uses the U.S. Department of Transportations' four (4) factor analysis to determine the level and extent of language assistance measures needed to sufficiently ensure meaningful access to the City of Griffin's programs and activities. They are:

Factor 1 – The number or proportion of LEP persons eligible to be served or likely to be encountered by City programs and activities;

Factor 2 – The frequency with which LEP individuals come in contact with City programs and activities;

Factor 3 – The nature and importance of the program, activity or service being provided to an individual’s life; and

Factor 4 – The resources available to the City of Griffin and related costs.

The intent of this policy is to find a balance that ensures meaningful access by LEP persons to critical services while not imposing an undue burden(s) on the City of Griffin. Specific steps to be taken, in terms of translation or language interpretation, will depend on the situation at the time, from coordination with LEP individuals and the organizations that serve them, and from analysis of the City of Griffin’s existing resources and the costs of providing language assistance.