



CITY OF GRANT
City of Grant
Title VI Plan

I. Plan Statement

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that "no person in the United States shall, on the grounds 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 U.S.C. Section 2000d).

The City is committed to ensuring that no person is excluded from participation in, or denied the benefits or services delivered by the City on the basis of race, color, or national origin, as protected by Title VI in Federal Highways Circular 4702.1.A.

This plan was developed to guide the City in its administration and management of Title VI-related activities.

Title VI Coordinator Contact information

Doug La Fave, City Manager
280 S. Maple St. (M-37)
Grant, MI 49327
Phone: 231-834-7904
Email: dlafave@cityofgrantmi.com

II. Title VI Information Dissemination

Title VI information posters shall be prominently and publicly displayed in City facilities. The name of the Title VI coordinator is available on the City's website, at www.cityofgrantmi.com home page. Additional information relating to nondiscrimination obligation can be obtained from the City's Title VI Coordinator.

Title VI information shall be disseminated to the City's employees annually via the Employee Education form (see Appendix A) in payroll envelopes. This form reminds employees of the City's policy statement, and of their Title VI responsibilities in their daily work and duties.

During New Employee Orientation, new employees shall be informed of the provisions of Title VI, and the City's expectations for them to perform their duties accordingly.

All employees shall be provided a copy of the Title VI Plan and are required to sign the Acknowledgement of Receipt (see Appendix B).



III. Subcontracts and Vendors

All subcontractors and vendors who receive payments from the City 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 (Appendix A), either directly or through the bid specification package which becomes an associated component of the contract.

IV. Record Keeping:

The Title VI Coordinator will maintain permanent records, which include, but are not limited to, signed acknowledgements of receipt from the employees indicating the receipt of the of the City's Title VI Plan, copies of Title VI complaints or lawsuits and related documentation, and records of correspondence to and from complainants, and Title VI investigations.

V. Title VI Complaint Procedures

How to file a Title VI Complaint?

The complainant may file a signed, written complaint up to thirty (30) days from the date of the alleged discrimination. The complaint should include the following information:

- Name of complainant, mailing address, and how to contact the complainant (i.e., telephone number, email address, etc.)
- How, when, where and why the complainant believes he or she was discriminated against. The complainant shall include the location, names and contact information of any witnesses.
- Other information that deemed significant by the complainant.

The Title VI Complaint Form (see Appendix C) may be used to submit the complaint information. The complaint may be filed in writing with the City at the following address:

City of Grant
Attn: Title VI Coordinator
Doug La Fave, City Manager
280 S. Maple St. (M-37)
P.O. Box 435
Grant, MI 49327

NOTE: The City encourages all complainants to certify all mail that is sent through the U.S. Postal Service and/or ensure that all written correspondence can be tracked. For complaints originally submitted by facsimile, an original, signed copy of the complaint must be mailed to



the Title VI Coordinator as soon as possible, but no later than thirty (30) days from the alleged date of discrimination.

What happens to the complaint after it is submitted?

All complaints alleging discrimination based on race, color or national origin in a service or benefit provided by the City will be directly addressed by the City. 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 shall make every effort to address all complaints in an expeditious and thorough manner.

A letter acknowledging receipt of a complaint will be mailed by the City within seven days (Appendix D). 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.

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

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

VI. Limited English Proficiency (LEP) Plan

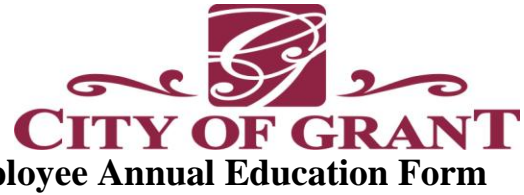
Data from the U.S. Census Bureau indicates that the size of language groups other than English in the City and surrounding townships is 5% or less of the total population.

The City will reach out to the bilingual community by identifying a translator fluent in Spanish to assist when necessary. The City has developed a LEP Plan (Appendix H).

VII. Community Outreach

Community Outreach is a requirement of Title VI. As an agency receiving federal financial assistance, the City has made the following community outreach efforts:

1. Conducts monthly City Council and or other meetings with the public invited to attend and participate in the all meetings pursuant to the State of Michigan's Open Meetings Act.
2. Title VI statements are posted in all City facilities for public viewing. (Appendix G)
3. The City has a user friendly website to enhance community relations efforts. The City's Title VI plan is available to the community on the website. (www.cityofgrantmi.com)



Appendix A

Employee Annual Education Form

Title VI Policy

No person shall, on the grounds 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.

All employees of the City are expected to consider, respect, and observe this policy. Citizen questions or complaints shall be directed to Title VI Coordinator, Doug La Fave.



Appendix B Acknowledgement of Receipt of Title VI Plan

I hereby acknowledge receipt of the City of Grant's Title VI Plan. I have read the plan and am committed to ensuring that no person is excluded from participation in, or denied the benefits or services delivered by the City on the basis of race, color, or national origin, as protected by Title VI.

Your signature

Print your name

Date



CITY OF GRANT
TITLE VI COMPLAINT FORM

Appendix C

Title VI of the 1964 Civil Rights Act requires that “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.” If you feel you have been discriminated against, please provide the following information in order to assist the City in processing your complaint and send it to:

City of Grant
Doug La Fave, City Manager
280 S. Maple St. (M-37)
P.O. Box 435
Grant, MI 49327

Complaints should be filed within 180 days of the alleged discrimination. If you could not reasonably be expected to know the act was discriminatory within 180-day period, you have 60 days after you became aware to file your complaint.

Please print clearly:

Name: _____

Address: _____

City

State

ZipCode: _____

Telephone Number: _____(home) _____(cell) _____(message)

Name of the individual who discriminated against you: _____

Address of the individual who discriminated against you: _____

City, State, Zip Code: _____

Please indicate why you believe the discrimination occurred:

- _____ race
- _____ color
- _____ national origin
- _____ income
- _____ other



What was the date of the alleged discrimination? _____

Where did the alleged discrimination take place? _____

Please describe the circumstances as you saw it: _____

Please list any and all witnesses' names and phone numbers:

What type of corrective action would you like to see taken?

Please attach any documents you have which support the allegation. Then date and sign this form.

Your signature

Print your name

Date



APPENDIX D Letter Acknowledging Receipt of Complaint

Today's Date

Mr. John Doe
1234 Main St.
Center City, MI 49327

Dear Mr. Doe:

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

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 (231) 834-7904, or write to me at this address:

Doug La Fave
City Manager
Title VI Coordinator
280 S. Maple St. (M-37)
P.O. Box 435
Grant, MI 49327

Sincerely,

Doug La Fave
City Manager
Title VI Coordinator



APPENDIX E Letter Notifying Complainant that the Complaint Is Substantiated

Today's Date

Mr. John Doe
1234 Main St.
Center City, MI 49327

Dear Mr. Doe:

The matter referenced in your letter of _____ (date) against the City of Grant 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 this matter. *(If a hearing is requested, the following sentence may be appropriate.)* You may be hearing from this office, or from Federal authorities, if your services should be needed during the administrative hearing process.

Sincerely,

Doug La Fave
City Manager
Title VI Coordinator



**APPENDIX F Letter Notifying Complainant that the Complaint Is
Not Substantiated**

Today's Date

Mr. John Doe
1234 Main St.
Center City, MI 49327

Dear Mr. Doe:

The matter referenced in your complaint of _____ (date) against the City of Grant alleging _____ has been investigated.

The results of the investigation did not indicate that the provisions of Title VI of the Civil Rights Act of 1964, have 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 has analyzed the materials and facts pertaining to your case for evidence of the City's 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 appeal this decision within seven calendar days of receipt of this final written decision from the City to the appropriate Federal agency.

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

Sincerely,

Doug La Fave
City Manager
Title VI Coordinator



APPENDIX G

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that "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 U.S.C. Section 2000d).

The City of Grant is committed to ensuring that no person is excluded from participation in, or denied the benefits or services it provides on the basis of race, color, or national origin. **If you feel you are being denied participation in or being denied services provided by the City of Fremont, or otherwise being discriminated against because of your race, color, national origin, gender, age, or disability, you may contact:**

City of Grant
Doug La Fave, City Manager
280 S. Maple St. (M-37)
P.O. Box 435
Grant, MI 49327

For more information, visit our website at www.cityofgrantmi.com



APPENDIX H

Limited English Proficiency Plan City of Grant

**Title VI Coordinator
City Manager-Doug La Fave
280 S. Maple St (M-37)
PO Box 435
Grant, MI 49327
231-834-7904**

I. INTRODUCTION

This *Limited English Proficiency Plan* has been prepared to address the City of Grant's responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq, and its implementing regulations, which state that no person shall be subjected to discrimination on the basis of race, color or national origin.

Executive Order 13166, titled *Improving Access to Services for Persons with Limited English Proficiency*, indicates that differing treatment based upon a person's inability to speak, read, write or understand English is a type of national origin discrimination. It directs each agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discrimination does not take place. This order applies to all state and local agencies which receive federal funds, including all City of Grant departments receiving federal grant funds.

• **Plan Summary**

The City of Grant has developed this *Limited English Proficiency Plan* to help identify reasonable steps for providing language assistance to persons with limited English proficiency [LEP] who wish to access services provided. As defined Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write or understand English. This plan outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, staff training that may be required, and how to notify LEP persons that assistance is available.



In order to prepare this plan, the City of Grant used the four-factor LEP analysis which considers the following factors:

1. The number or proportion of LEP persons in the service area who may be served by the City of Grant.
2. The frequency with which LEP persons come in contact with City of Grant services.
3. The nature and importance of services provided by the City of Grant to the LEP population.
4. The interpretation services available to the City of Grant and overall cost to provide LEP assistance. A summary of the results of the four-factor analysis is in the following section.

II. MEANINGFUL ACCESS: FOUR-FACTOR ANALYSIS

1. The number or proportion of LEP persons in the service area who may be served or are likely to require City of Grant services.

The City of Grant staff reviewed the 2010 U.S. Census ACS Survey and determined that 23 persons in Grant [2.5% of the population] can speak a language other than English. Of those 23 persons 12 [1.3% of the population] have limited English proficiency; that is, they speak English “not well” or “not at all”. In Grant, of those persons with limited English proficiency, the only other language spoken is Spanish.

2. The frequency with which LEP persons come in contact with City of Grant services.

The City of Grant staff reviewed the frequency with which City Council, office staff and maintenance staff have, or could have, contact with LEP persons. This includes documenting phone inquiries or office visits. To date, the City of Grant has had no requests for interpreters and no requests for translated program documents. The City Council, office staff and maintenance staff have had very little contact with LEP persons.

3. The nature and importance of services provided by the City of Grant to the LEP population.

There is no large geographic concentration of any type of LEP individuals in the service area for the City of Grant. The overwhelming majority of the population speak English. As a result, there are few social, service, professional and leadership organizations within the City of Grant service area that focus on outreach to LEP individuals. The City of Grant City Council and staff are most likely to encounter LEP individuals through office visits, phone conversations, notifications from maintenance staff of impacts on city services and attendance at City Council meetings.



4. The resources available to the City of Grant, and overall costs to provide LEP assistance.

The City of Grant reviewed its available resources that could be used for providing LEP assistance, which of its documents would be most valuable to be translated if the need should arise, and contacted local citizens that would be willing to provide voluntary Spanish translation if needed within a reasonable time period. Other language translation if needed would be provided through a telephone interpreter line for which the city would pay a fee.

III. LANGUAGE ASSISTANCE

A person who does not speak English as their primary language and who has a limited ability to read, write, speak or understand English may be a Limited English Proficient person and may be entitled to language assistance with respect to City of Grant services. Language assistance can include interpretation, which means oral or spoken transfer of a message from one language into another language and/or translation, which means the written transfer of a message from one language into another language.

How the City of Grant staff may identify an LEP person who needs language assistance:

- Post notice of LEP Plan and the availability of interpretation or translation services free of charge in languages LEP persons would understand.
- All city staff will be provided with “I Speak” cards to assist in identifying the language interpretation needed if the occasion arises.
- All City of Grant staff will be informally surveyed periodically on their experience concerning any contacts with LEP persons during the previous year.
- When the City of Grant sponsors an informational meeting or event, a staff person may greet participants as they arrive. By informally engaging participants in conversation it is possible to gauge each attendee’s ability to speak and understand English. Although translation may not be able to be provided at the event it will help identify the need for future events.

A. Language Assistance Measures-Although there is a low percentage in the City of Grant of LEP individuals, that is, persons who speak English “not well” or “not at all”, it will strive to offer the following measures:

- 1.** The City of Grant staff will take reasonable steps to provide the opportunity for meaningful access to LEP clients who have difficulty communicating English.
- 2.** The following resources will be available to accommodate LEP persons:
 - i.** Volunteer interpreters for the Spanish language are available and will be provided within a reasonable time period (the City of Grant currently has two bi-lingual Reserve Officers in the Police Department).



ii. Language interpretation will be accessed for all other languages through a telephone interpretation service.

IV. STAFF TRAINING

The following training will be provided to all staff:

- Information on the Title VI Policy and LEP responsibilities.
- Description of language assistance services offered to the public.
- Use of the “I Speak” cards.
- Documentation of language assistance requests.
- How to handle a potential Title VI/LEP complaint.

All contractors or subcontractors performing work for the City of Grant will be required to follow the Title VI/LEP guidelines.

V. TRANSLATION OF DOCUMENTS

• The City of Grant weighed the cost and benefits of translating documents for potential LEP groups. Considering the expense of translating the documents, the likelihood of frequent changes in documents and other relevant factors, at this time it is an unnecessary burden to have any documents translated.

• Due to the small local LEP population, the City of Grant does not have a formal outreach procedure in place, as of 2012. Translation resources have been identified and are limited in this region. However, when and if the need arises for LEP outreach, the City of Grant will consider the following options:

• When staff prepares a document, or schedules a meeting, for which the target audience is expected to include LEP individuals, then documents, meeting notices, flyers, and agendas will be printed in an alternative language based on the known LEP population.

VI. MONITORING

Monitoring and Updating the LEP Plan- The City of Grant will update the LEP Plan as required. At a minimum, the plan will be reviewed and updated when more data from the 2010 U.S. Census is available, or when it is clear that higher concentrations of LEP individuals are present in the City of Grant service area. Updates will include the following:

- The number of documented LEP person contacts encountered annually.
- How the needs of LEP persons have been addressed.
- Determination of the current LEP population in the service area.



- Determination as to whether the need for translation services has changed.
- Determine whether local language assistance programs have been effective and sufficient to meet the need.
- Determine whether the City of Grant's financial resources are sufficient to fund language assistance resources needed.
- Determine whether the City of Grant fully complies with the goals of this LEP Plan.
- Determine whether complaints have been received concerning the agency's failure to meet the needs of LEP individuals.

VII. DISSEMINATION OF THE CITY OF GRANT LEP PLAN

- Post signs at City Hall notifying LEP persons of the LEP Plan and how to access language services.