

EXHIBIT A

# City of Chamblee

## Title VI Plan

### 2015



Approved by City Council  
July 21, 2015

**Table of Contents**

I. Policy Statement ..... 1  
II. Title VI Information Dissemination..... 3  
III. Subcontracts and Vendors..... 3  
IV. Record Keeping..... 3  
V. Title VI Complaint Procedures ..... 4  
VI. Limited English Proficiency (LEP) ..... 5

**Appendices**

Appendix A - Acknowledgement of Receipt of Title VI Plan..... 7  
Appendix B - Title VI Complaint Form..... 8  
Appendix C - Sample Letter Acknowledging Receipt of Complaint ..... 11  
Appendix D - Sample Letter Notifying Complainant that the Complaint Is Substantiated ..... 12  
Appendix E - Sample Letter Notifying Complainant that the Complaint Is Not Substantiated..... 13

## I. Policy Statement

The City of Chamblee, hereinafter referred to as “City”, is committed to compliance with Title VI of the Civil Rights Act of 1964 and all related regulations and directives. The City 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 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 will take reasonable steps to provide meaningful access to services for persons with Limited English Proficiency.

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

The City Manager will appoint one or more Title VI Coordinators to implement and oversee the City’s Title VI activities, prepare required reports and handle other City responsibilities as required by 23 Code of Federal Regulation (CFR) 200 and 49 Code of Federal Regulation 21.

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R. Eric Clarkson  
Mayor

Date

## II. Title VI Information Dissemination

This Title VI Plan will also be posted on the City's website at: [www.chambleega.gov](http://www.chambleega.gov). Additional information relating to nondiscrimination obligations can be obtained from the City's Title VI Coordinator.

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

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

## III. Subcontracts and Vendors

All subcontractors and vendors who receive payments from the City of Chamblee where funding originates from any federal assistance are subject to the provisions of Title VI of the Civil Rights Act of 1964 as amended. The City will investigate any Title VI complaints received regarding City contractors.

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 Chamblee:**

*The City of Chamblee, 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.*

## 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 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

1. Any person who believes that he or she, individually, as a member of any specific class, or in connection with any disadvantaged business enterprise, has been subjected to discrimination prohibited by Title VI of the Civil Rights Act of 1964, as amended, may file a complaint with the City. A complaint may also be filed by a representative on behalf of such a person. All complaints will be referred to the City's Title VI Coordinator for review and action.
2. 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 not later than one hundred eighty (180) calendar days after the alleged discrimination occurred. If the complainant is not satisfied with the findings or the proposed remedial action, the complainant may still file externally within any applicable statute of limitations.

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

3. Complaints shall be in writing and shall be signed by the complainant and/or the complainant's representative. Complaints shall set forth as fully as possible the facts and circumstances surrounding the claimed discrimination. In the event that a person makes a verbal complaint of discrimination to any officer or employee of the City, the person shall be interviewed by the Title VI Coordinator. If necessary, the Coordinator will assist the person in reducing the complaint to writing and submit the written version of the complaint to the person for signature. The complaint shall then be handled in the usual manner.
4. Generally, the following information will be included in every notification to the Title VI Coordinator:
  - (a) Name, address, and phone number of the complainant;
  - (b) Names and city department(s) of alleged discriminating official(s);
  - (c) The nature of the incident that led to the complainant to feel that discrimination was a factor;
  - (d) Basis of complaint (i.e., race, color, national origin, sex, age, disability/handicap);
  - (e) Names, addresses and phone numbers of people who may have knowledge of the event;
  - (f) The date or dates on which the alleged discriminatory event or events

occurred;

- (g) Other agencies (state, local or Federal) where the complaint has been filed.
5. A letter acknowledging receipt of complaint will be mailed within thirty (10) days (Appendix C). 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.
  6. Upon receipt of a complaint, the Coordinator will determine jurisdiction. Complaints against the City involving Federal Highway Administration funds will be forwarded to the appropriate State agency, the Georgia Department of Transportation, for proper disposition pursuant to its procedures.
  7. The City's Coordinator shall notify the department head of the complaint and initiate an investigation of the allegation immediately. The department head shall provide assistance during this internal investigation as requested by the Coordinator. The results of the investigation will be documented in a report of findings to the City Manager. Complaints should be resolved by informal means whenever possible. Such informal attempts and their results will be summarized in the report findings.
  8. The City's Coordinator will notify the complainant in writing of the final decision reached (see Appendix D or E), including the proposed disposition of the matter. The notification will advise the complainant of his/her appeal rights with the Department of Transportation, or the Federal Highway Administration, if they are dissatisfied with final decision rendered by the City. 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)

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

As a recipient of Federal Transportation Funding, the City of Chamblee must take reasonable steps to ensure meaningful access to its programs and activities by LEP persons. The U.S. Department of Transportation recommends analyzing the following four factors to determine the level and extent of language-assistance measures required within the grantee's area of responsibility:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or grantee;

2. The frequency with which LEP individuals come in contact with the program;
3. The nature and importance of the program, activity, or service provided by the program to people's lives; and
4. The resources available to the grantee/recipient or agency, and costs.

The intent of this policy is to find a balance that ensures meaningful access by LEP persons to critical services while not imposing undue burdens on the City or department. 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 Chamblee's existing resources and the costs of providing language assistance.

Appendix A  
Acknowledgement of Receipt of Title VI Plan

I hereby acknowledge the receipt of the City of Chamblee's Title VI Plan. I have read the plan and am committed to ensuring 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.

\_\_\_\_\_  
Your signature

\_\_\_\_\_  
Print your name

\_\_\_\_\_  
Date

## Appendix B Title VI Complaint Form

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.”

Note: The following information is necessary to assist us in processing your complaint. Should you require any assistance in completing this form, please let us know. Complete and return this for to the City of Chamblee’s Title VI Coordinator at:

City Manager’s Office, Title VI Coordinator  
City of Chamblee  
5468 Peachtree Road  
Chamblee Georgia 30341

Please print clearly:

Name: \_\_\_\_\_

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

City, State, Zip Code: \_\_\_\_\_

Telephone Number: \_\_\_\_\_(home) \_\_\_\_\_(cell) \_\_\_\_\_(message)

Person discriminated against: \_\_\_\_\_

Address of person discriminated against: \_\_\_\_\_

City, State, Zip Code: \_\_\_\_\_

Please indicate why you believe the discrimination occurred:

\_\_\_\_\_ Race or color

\_\_\_\_\_ National origin

\_\_\_\_\_ Income

\_\_\_\_\_ Other

What was the date of the alleged discrimination? \_\_\_\_\_



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

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Please attach any documents you have which support the allegation. Then date and sign this form and send to the Title VI Coordinator at:

City Manager's Office, Title VI Coordinator  
City of Chamblee  
5468 Peachtree Road  
Chamblee Georgia 30341

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Your signature

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Print your name

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Date

Appendix C  
Sample Letter Acknowledging Receipt of Complaint

Today's Date

Ms. Jo Doe 1234 Main St.  
Clarksville, Tennessee 37040

Dear Ms. Doe:

This letter is to acknowledge receipt of your complaint against the City of Chamblee 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, or write to me at this address.

Sincerely,

*Name*  
Title VI Coordinator  
City of Chamblee

## Appendix D

### Sample Letter Notifying Complainant that the Complaint Is Substantiated

Today's Date

Ms. Jo Doe 1234 Main St.  
Clarksville, Tennessee 37040

Dear Ms. Doe:

The matter referenced in your letter of \_\_\_\_\_ (date) against the City of Chamblee 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. *(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,

*Name*  
Title VI Coordinator  
City of Chamblee

Appendix E  
Sample Letter Notifying Complainant that the Complaint Is Not  
Substantiated

Today's Date

Ms. Jo Doe 1234 Main St.  
Clarksville, Tennessee 37040 Dear Ms. Doe:

The matter referenced in your complaint of \_\_\_\_\_(date) against the City of Chamblee 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, 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 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 file a complaint externally with the U.S. Department of Transportation and/or the Federal Transit Administration at

Federal Transit Administration Office of Civil Rights Attention: Title VI Program  
Coordinator  
East Building, 5th Floor - TCR 1200 New Jersey Ave., SE  
Washington, DC 20590

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,

*Name*  
Title VI Coordinator  
City of Chamblee