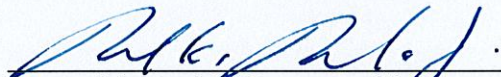


City of Waterbury
Title VI Program Policy

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I. TITLE VI AND RELATED STATUTES NON-DISCRIMINATION STATEMENT

In accordance with City of Waterbury Code of Ordinances, Chapter 93, under Title VI of the Civil Rights Act of 1964 and other related statutes, the City ensures that no person shall, on the basis of race, color, sex, age, religious creed, disability, national origin or ancestry, marital status, family status, prior psychiatric treatment, health care, military status or source of income be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any programs or activities it administers.


Honorable Paul K. Pernerewski, Jr.
Mayor of the City of Waterbury

II. INTRODUCTION

The City of Waterbury is committed to compliance with Title VI of the Civil Rights Act of 1964 ("Title VI"), which states:

"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."

As a recipient of federal funding assistance, the City of Waterbury ensures that in accordance with Title VI, the City, its employees, agencies, departments and subdivisions does not unlawfully discriminate during the conduct of City business. The City requires every manager, supervisor, employee, contractor and vendor subrecipient of Federal aid funds to be aware of and apply the intent of Title VI and related statutes in performing assigned duties.

The City of Waterbury's Title VI Program Policy provides policy direction to ensure compliance with Title VI of the Civil Rights Act of 1964.

III. CITY OF WATERBURY TITLE VI NOTICE

The City of Waterbury displays the ‘Your Rights Under Title VI’ notice for public view and online at www.waterburyct.org. The notice is available in multiple languages.

Your Rights Under Title VI

What is Title VI? Title VI is a statutory provision of the Civil Rights Act of 1964 (“Title VI”), which states:

“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.”

What does Title VI mean? The City of Waterbury strives to ensure that access to and use of all programs, services, or benefits derived from any City activity will be administered without regard to race, color, or national origin.

Are your rights being violated? To request more information about Title VI, or If you believe you have been discriminated against because of your race, color, or national origin, you may file a written complaint within 180 days of the alleged discrimination with the City of Waterbury’s Title VI Coordinator. A complaint form is available online at www.waterburyct.org. You may submit your written complaint by email to TitleVIcomplaint@NRWIB.org or by U.S. mail to:

City of Waterbury Title VI Coordinator
Northwest Regional Workforce Investment Board
249 Thomaston Avenue
Waterbury, CT 06702

A complaint may also be filed directly with the agency providing federal assistance, or by filing a complaint with the U.S. Department of Justice, Civil Rights Division, 950 Pennsylvania Avenue, NW, Washington, D.C. 20530-0001.

IV. TITLE VI ASSURANCES

The City of Waterbury incorporates Title VI assurances in all Federal-aid contracts and agreements. These assurances are substantially as follows:

The contractor, its subcontractors and assigns, shall comply with following assurances:

Contractor ensures its current and future compliance with Title VI of the Civil Rights Act of 1964, as amended, which prohibits exclusion from participation, denial of benefits of, or subjection to discrimination under programs and activities receiving federal financial assistance, of any person in the United States on the ground of race, color, or natural origin (42 U.S.C. § 2000d et seq.), as implemented by the Department of Treasury Title VI regulations at 31 CFR Part 22 and other pertinent executive orders such as Executive Order 13166, directives, circulars, policies, memoranda, and/or guidance documents.

Contractor acknowledges that Executive Order 13166, "Improving Access to Persons with Limited English Proficiency," seeks to improve access to federally assisted programs and activities for individuals who, because of national origin, have Limited English proficiency (LEP). Contractor understands that denying a person access to its programs, services, and activities because of LEP is a form of national origin discrimination prohibited under Title VI of the Civil Rights Act of 1964 and the Department of the Treasury's implementing regulations. Accordingly, Contractor shall initiate reasonable steps, or comply with the department of Treasury's directives, to ensure that LEP persons have meaningful access to its programs, services, and activities. Contractor understands and agrees that meaningful access may entail providing language assistance services, including oral interpretation and written translation where necessary, to ensure effective communication in the Contractor's programs, services, and activities.

Contractor agrees to consider the need for language services for LEP persons when Contractor develops applicable budgets and conducts programs, services and activities. As a resource the Department of Treasury has published its LEP guidance at 70 CFR 6067. For more information on taking reasonable steps to provide meaningful access to LEP persons, please visit <http://www.lep.gov>.

Contractor acknowledges and agrees that compliance with the assurances constitutes a condition of continued receipt of federal financial assistance and is binding upon Contractor and Contractor's successors, transferees, and assigns for the period in which such assistance is provided.

V. ORGANIZATION, STAFFING & STRUCTURE

The City of Waterbury Title VI Coordinator is responsible for the overall program implementation of Title VI and performs a lead and participatory role in the development and implementation of Title VI Program compliance.

The Title VI Coordinator ensures implementation of the City of Waterbury's Title VI program. The Title VI Coordinator position is subsumed within the Northwest Regional Workforce Investment Board.

The Title VI Coordinator is responsible for helping to implement, monitor and report on the City's Title VI program activities to meet all Federal and State requirements. The Title VI Coordinator shall take a lead role in assisting the City in educating its staff on Title VI responsibilities and obligations, ensuring that the City is compliant with all Title VI related requirements including language assisted protocols and that Title VI notices and publications are publicly displayed as required.

The Title VI Coordinator shall interface with all City departments receiving federal funding or administering federal grant funds to acquire demographic data that shall be maintained by the departments or agencies showing how the City's minority populations (by race, color and national origin) are served by the federally funded programs and/or services. The Title VI Coordinator shall publish an annual Title VI report, to be furnished to the Mayor of the City of Waterbury, City of Waterbury Corporation Counsel, and City of Waterbury Director of Finance, reporting demographic and utilization data collected and also including information on work carried out by the Title VI Coordinator in furtherance of the City's Title VI policy and the overall goals of Title VI.

In addition to the administration and compliance functions described, the Title VI Coordinator shall also be involved in the enforcement of Title VI as provided in the City's Title VI policy. This shall include the processing, investigation, documentation, and disposition of complaints.

VI. DATA COLLECTION

The City of Waterbury will collect statistical data (race, color, and national origin) of participants in, and beneficiaries of, federally funded projects.

VII. LANGUAGE ASSISTANCE

A person with limited English proficiency (LEP) is one who does not speak English as his or her primary language and has a limited ability to read, write, speak or understand English. It is the policy of the City of Waterbury to ensure that LEP persons have full access to its programs, services and activities. The City recognizes that language can be a barrier to accessing important benefits or services, understanding and exercising important rights, complying with regulations, or understanding other information provided by its programs and activities.

The City's policy is to take reasonable steps to ensure meaningful access to LEP beneficiaries, considering: (1) the number or proportion of LEP persons in the eligible service population; (2) the frequency with which LEP individuals come into contact with the program; (3) the importance of the services provided by the program; and (4) the resources available to the recipient. A copy of the Title VI Notice and the Title VI Complaint form are all available in multiple languages.

If there is a consistent need for translation into a different language, the City will consider additional appropriate measures to serve the language access needs of those persons.

VIII. TITLE VI COMPLAINT PROCEDURES

Any person who believes he or she has been subjected to unlawful discriminatory practice under Title VI has a right to file a formal complaint. Any such complaint must be filed in writing with the City of Waterbury Title VI Coordinator within 180 days following the date of the alleged discriminatory action. Complaint forms are available at Waterbury City Hall and online at www.waterburycct.org.

Complaints must be filed in writing and should be directed to:

City of Waterbury Title VI Coordinator
Northwest Regional Workforce Investment Board
249 Thomaston Avenue
Waterbury, CT 06702

Or by email to: TitleVIcomplaint@NRWIB.org

Alternatively, a complaint may be filed directly with the agency providing federal assistance, or by filing a complaint with the U.S. Department of Justice, Civil Rights Division, 950 Pennsylvania Avenue, NW, Washington, D.C. 20530.

Within 10 business days of receiving the complaint, the Title VI Coordinator will review the complaint to determine its administration has jurisdiction. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by the Title VI Coordinator. If it is determined within the 10 day period that the Title VI Coordinator has jurisdiction regarding the complaint, the Title VI Coordinator will then have 30 days to investigate the complaint. The complainant will be notified in writing of the cause to any planned extension to the 30-day timeline.

If more information is needed to resolve the case, the Title VI Coordinator may contact the complainant. The complainant has 10 business days from the date of the letter to send requested information to the Title VI Coordinator investigation personnel assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within 10 business days, the Title VI Coordinator can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue his/her case.

After the Title VI Coordinator reviews the complaint, she/he will issue one of two letters to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. An LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member or other action will occur.

A. Title VI Complaint Form

Title VI Complaint Form

Title VI is a statutory provision of the Civil Rights Act of 1964 ("Title VI"). Title VI requires 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. §2000d. If you believe you have been discriminated against because of your race, color, or national origin, you may file a written complaint within 180 days of the alleged discrimination. To do so, please complete this form (attach additional pages, if necessary) and email it to TitleVIcomplaint@NRWIB.org or send via U.S. mail to:

City of Waterbury Title VI Coordinator
Northwest Regional Workforce Investment Board
249 Thomaston Avenue
Waterbury, CT 06702

Note: The use of this complaint form is not mandatory. You may submit your complaint in any form that includes your signature.

Complainant Information:

Name: _____
Mailing Address: _____
Telephone: _____
Email Address: _____

Attorney Information:

If you are represented by an attorney, please provide their contact information below.

Name: _____
Mailing Address: _____
Telephone: _____
Email Address: _____

Basis of Discriminatory Action(s):

Check the box(es) for the type(s) of discrimination you allege to have experienced.

- | | |
|--------------------------------|--|
| <input type="checkbox"/> Race | <input type="checkbox"/> National Origin |
| <input type="checkbox"/> Color | |

Date and location of alleged discriminatory action(s):

Please include the earliest and most recent date of the alleged discrimination.

Date

Location

--	--

How were you discriminated against?

Describe the nature of the action, decision, or conditions of the alleged discrimination.

--

Explain, as clearly as possible, what happened and why you believe your protected status (basis) was a factor in the discrimination.

--

Include how other persons were treated differently than you.

--

Names of individuals s (i.e., witnesses, fellow employees, supervisors, or others) that we may contact for additional information to support or clarify your complaint (please include their contact information):

The laws prohibit retaliation against anyone because they have taken action, or participated in an action, to secure rights protected by these laws. If you feel you have been retaliated against (separate from the discrimination alleged above), please explain the circumstances below. Please explain what actions you took that you believe were the basis for the allegation.

What remedy, or action, are you seeking for the alleged discrimination?

IV. COMPLIANCE REPORTING

The Title VI Coordinator on behalf of the City of Waterbury will maintain such records and submit to the responsible federal or state official or his designee timely, complete, and accurate compliance reports at such times, and in such form and containing such information, as the relevant awarding agency may determine to be necessary to enable that agency to ascertain whether the recipient has complied or is complying with this requirement. The Title VI Coordinator on behalf of the City of Waterbury will make available for the relevant awarding agency racial and ethnic data showing the extent to which members of minority groups are beneficiaries of federally assisted programs. In the case in which the City extends Federal financial assistance to any other recipient or subcontracts with any other person or group, the City requires such other recipient to submit compliance reports to the City as may be necessary to enable the City to carry out its compliance reporting obligations.

The Title VI Coordinator on behalf of the City will permit access during normal business hours to such of its books, records, accounts, and other sources of information, and its facilities, as may be pertinent to ascertain compliance with Title VI. Whenever any information required of the City is in the exclusive possession of any other agency, institution, or person and that agency, institution, or person fails or refuses to furnish that information, the recipient shall so certify in its report and set forth the efforts which it has made to obtain the information.