

ADMINISTRATIVE POLICIES



POLICY NO.: ADM-53

POLICY: Title VI Non-Discrimination Policy

ORIGINAL ISSUE DATE: 03/28/2014

REVISION EFFECTIVE DATE:

Approved by: _____

PURPOSE: It is the policy of the City of St. Peters to comply with Title VI of the Civil Rights Act of 1964 and the Civil Rights Restoration Act of 1987 (PL 100.259) (Title VI) by ensuring that no person shall, on the grounds of race, color, national origin, age, or gender be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity (for which the City received Federal financial assistance. It is also the policy of the City of St. Peters to comply with Title II of the Americans with Disabilities Act, 42 U.S.C. §§ 12131, *et seq.*, and the regulations implementing Title H, 28 C.F.R. Part 35, by ensuring that it does not discriminate against persons based on disability.

POLICY: Title VI Non-Discrimination Policy and Procedures

GENERAL PROCEDURE: This policy means that, among other things, the City will not discriminate by:

- (a) denying a person access or equal access to a service or program;
- (b) denying a person the opportunity or equal opportunity to participate in a program through the provision of services or otherwise;
- (c) providing a person a service that is different, or is provided in a different manner, than the same service provided to others under the program;
- (d) treating a person differently from others in determining whether he/she meets the criteria necessary to receive services or participate in a program; or
- (e) subjecting a person to segregation or separate treatment in any matter related to his/her receipt of services.
- (f) coerce, intimidate, threaten, interfere, or retaliate against any person in the exercise or enjoyment of, or on account of his or her having exercised or enjoyed, or on account of his or her having aided or encouraged any other person in the exercise or enjoyment of, any right granted or protected by these laws.

POLICY NO.: ADM-XX

LIMITED ENGLISH PROFICIENCY (LEP):

Limited English Proficiency (LEP) status includes persons who do not speak English as their primary language and who have a limited ability to read, speak, write or understand English. These individuals are entitled to language assistance at no cost to them. The City shall take reasonable steps to ensure that LEP persons have meaningful access to its programs, services and information.

ENVIRONMENTAL JUSTICE:

Environmental Justice refers to the federal government policy that all agencies will identify and address disproportionately high and adverse human health or environmental effects of their policies, programs, and activities on minority populations and low-income populations. The City shall take reasonable steps to ensure that our projects and programs are appropriately assessed for Environmental Justice impacts and shall address as appropriate.

Administration of Title VI Responsibilities

The City Administrator shall be responsible for the City's Title VI administration. The City Administrator shall have the responsibility to receive complaints of alleged Title VI discrimination and disability discrimination against the City, serve as a resource to the City and its agencies, officers, elected and appointed officials, employees, and agents on Title VI rights, and shall coordinate the City's compliance.

Complaints

The City Administrator shall receive and review all complaints of Title VI discrimination made against the City or any officer, elected or appointed official, employee or agent of the City. If complaints are made verbally, the Compliance officer shall make a contemporaneous written record of those complaints.

Any person who believes that the Title VI Non-Discrimination Policy has been violated by the City may contact the City Administrator:

- City of St. Peters
William P. Charnisky
One St. Peters Centre Blvd
St. Peters, MO 63376
Telephone: 636-477-6600, ext.1202 or,
- U.S. Department of Justice
Civil Rights Division
950 Pennsylvania Ave, N.W.
Washington, DC 20530
1-888-TITLE-06 (1-888-848-5306) (Voice or TDD)

Upon request, assistance will be provided to any person(s) unable to read or write English or who otherwise needs other assistance in filing a complaint. The complaint must be filed within one hundred eighty (180) calendar days after the date the discrimination occurred.

In order to be accepted, a complaint must involve a covered basis such as race, color, national origin or retaliation and the complaint must involve a program or activity of the City

of St. Peters, or , where applicable, one of the City's Federal-aid subrecipient(s), consultant(s), or contractor(s). A complaint may be dismissed for the following reasons:

- a) The complainant requests the withdrawal of the complaint.
- b) The complainant fails to respond to repeated request for additional information needed to process the complaint.
- c) The complainant cannot be located after reasonable attempts.

Within fifteen (15) days after receiving a complaint, the City will forward a copy of the complaint to the appropriate, designated federal and/ or state agency related to the complaint, if required and the City will send a written acknowledgement to the complainant advising that the complaint will be investigated.

Every effort shall be made to obtain early resolution of complaints and to resolve complaints informally at the lowest level. If the complainant is dissatisfied with the City's resolution of the complaint, he/she may also submit a written complaint to the appropriate federal agency in accordance with the requirements of the appropriate federal agency. The complaint must be filed within one hundred eighty (180) calendar days after the date the discrimination occurred.

Dissemination

It is the City's goal to ensure awareness of and compliance with the provision of Title VI and the responsibilities associated with Title VI of the Civil Rights Act of 1964 and related laws. The City shall disseminate its Title VI Non-Discrimination Policy to all officers, elected and appointed officials, and its employees.

It is the City's policy that all federal-aid contracts must include contract assurance language in compliance with Title VI. Contractors and subcontractors may not discriminate in selection and retention of subcontractors and cannot discriminate in their employment practices in connection with highway construction projects assisted by federal funds.

The city shall include the Title VI Non-Discrimination Policy as a readily accessible link on the City's website.