

RESOLUTION NO. 20190528-D

A RESOLUTION ADOPTING TITLE VI  
OF THE CIVIL RIGHTS ACT OF 1964 POLICY FOR THE  
TOWN OF ALEXANDRIA

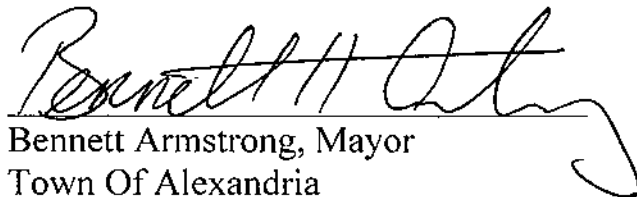
**WHEREAS**, the federal government enacted Title VI of the Civil Rights Act of 1964, as amended, to prevent discrimination on the grounds of race, color, sex, age, disability or national origin and to ensure that individuals are not excluded from participation in, denied benefits of, or otherwise subjected to discriminations under any program or activity receiving federal financial assistance of the basis of race, color, sex, age, disability or national origin;

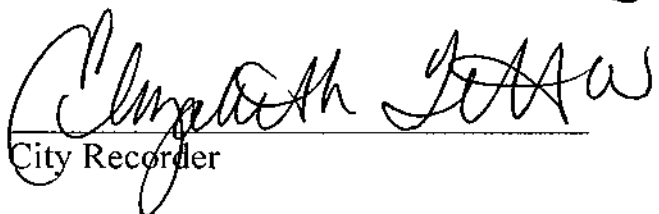
**WHEREAS**, throughout the years, additional regulations, statutes, directives, cases and executive orders have been passes which expand the breadth of Title VI;

**WHEREAS**, it is a requirement that communities receiving federal or state financial assistance adopt a Title VI Plan.

**NOW THEREFORE** be it resolved by the Mayor and Board of Aldermen of the Town of Alexandria that, the Town of Alexandria hereby adopts the attached Title VI Policy and LEP Implementation Plan.

PASSED AND RESOLVED, this 28<sup>th</sup> day of May 2019.

  
Bennett Armstrong, Mayor  
Town Of Alexandria

  
City Recorder

## **TITLE VI POLICY**

Town of Alexandria complies with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d et seq.), which states 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.”

Any person who believes that discrimination has occurred by the Town of Alexandria on the basis of race, color or national origin, including limited English proficiency (LEP), in violation of Title VI may file a written complaint with the Tennessee Human Rights Commission. Complaints must be filed within 180 days of the alleged discriminatory act. Complaints may also be filed with the state or federal agency involved, or the United States Department of Justice. For more information, please contact the Tennessee Human Rights Commission.

### **TITLE VI COMPLIANCE PROGRAM**

All employees will complete the online Title VI training annually in June. All new employees will complete the training within sixty (60) days of their start date and again annually. Recordkeeping requires the certificate be printed and submitted to the City Recorder no later than June 30<sup>th</sup>.

The City Recorder will be required to compile training records annually and report to the Mayor and the Board of Alderman any deficiencies there in.

### **TITLE VI COMPLAINTS OF DISCRIMINATION**

Title VI complaints must be submitted in writing, signed, and submitted within 180 calendar days of the alleged discriminatory act. The complaint may be filed with the allegedly discriminating agency, the Tennessee Human Rights Commission (THRC), the relevant state agency, or the relevant federal agency.

The following information should be included in a Title VI complaint:

- The name, address, and telephone number of the complaining party. The complaint must be signed and filed within 180 calendar days of the alleged

discriminatory act. If you are filing on behalf of another person, include your name, address, telephone number and your relation to that person (for example: friend, attorney, parent, etc.).

- The name and address of the agency, institution, or department alleged to have committed the discriminatory act.
- How, why, and when the discriminatory act(s) occurred. Please include as much background information as possible about the alleged acts of discrimination. Include names of individuals involved in the discrimination, if you know them, as well as any other relevant information.
- The names, addresses, and phone numbers of any witnesses, if known, that the investigating agency may contact for additional information to support or clarify your allegations.
- The complaint should be sent to the City Recorder, Town of Alexandria, P O Box 277, Alexandria, TN 37012
- The Tennessee Human Rights Commission's (THRC) Title VI Compliance Program will be notified of any complaints within ten (10) business days of receipt.

**DISCLAIMER:** Please do not submit confidential information, such as Social Security Number, Driver's License number, or birthdate with the Title VI Complaint.

Upon receipt of the complaint, the Town of Alexandria Title VI staff will evaluate jurisdiction, the need for additional information, and investigate the merit of the complaint. If the complaint is filed by an internal party, Town of Alexandria does not have jurisdiction and will forward it to the appropriate agency having jurisdiction to review it.

If Town of Alexandria has jurisdiction to investigate, Town of Alexandria will investigate the complaint and notify parties of the final decision in writing. If the investigation indicates that a violation did not occur, the Town of Alexandria will notify the parties of the final decision in writing.

If complainant is not satisfied with the results of the investigation, the complainant may appeal to the appropriate Federal agency.

Complainants also have the option to file a complaint directly with THRC or the appropriate Federal agency within 180 days of the alleged discrimination. THRC may be reached by phone at (615) 741-5825 or toll free at 1(800) 251-3589 or at:

William R. Snodgrass Tennessee Tower, 312 Rosa L Parks Ave, 23<sup>rd</sup> Floor,  
Nashville, TN 37243

## **LIMITED ENGLISH PROFICIENCY (LEP) POLICY**

Town of Alexandria will take reasonable steps to ensure that persons with Limited English Proficiency (LEP) have meaningful access and an equal opportunity to participate in our services, activities, programs and other benefits. The policy of the Town of Alexandria is to ensure meaningful communication with persons that experience LEP and their authorized representatives. This policy also provides for communication of information contained in vital documents, including but not limited to, waivers of rights and consent forms. All interpreters, translators and other aids needed to comply with this policy shall be provided without cost to the person being served.

Language assistance will be provided through use of competent interpreters, contracts or formal arrangements with organizations providing interpretation or translation services, or technology and telephonic interpretation services. All staff will be provided notice of this policy and procedure, and staff that may have direct contact with LEP individuals will be trained in effective communication techniques, including the effective use of an interpreter.

The Town of Alexandria will conduct a regular review of the language access needs of our service population, as well as update and monitor the implementation of this policy and these procedures, as necessary.

### **PROCEDURES:**

#### **IDENTIFYING LEP PERSONS AND THEIR LANGUAGE**

The Town of Alexandria will promptly identify the language and communication needs of the LEP person. If necessary, staff will use a language identification card (or "I speak cards") or posters to determine the language. In addition, when records are kept of past interactions with individuals or their family members, the language used to communicate with the LEP person will be included as part of the record.

#### **OBTAINING A QUALIFIED INTERPRETER**

The City Recorder and Chief of Police are responsible for obtaining an outside interpreter. Avaza will be used as a qualified interpreter service. The agency's telephone number(s) are 800-482-8292, 615-534-3400.

Some LEP persons may prefer or request to use a family member or friend as an interpreter. However, family members or friends of the LEP person will not be used as interpreters unless specifically requested by that individual and after the LEP person has understood that an offer of an interpreter at no charge to the person has been made by the department or agency. Such an offer and the response will be documented in the person's file. If the LEP person chooses to use a family member or friend as an interpreter, issues of competency of interpretation, confidentiality, privacy, and conflict of interest will be considered. If the family member or friend is not competent or appropriate for any of these reasons, competent interpreter services will be provided to the LEP person.

Children (e.g. persons under the age of 18) will not be used to interpret, in order to ensure confidentiality of information and accurate communication.

#### PROVIDING WRITTEN TRANSLATIONS

(a) When translation of vital documents is needed, each department in the Town of Alexandria will submit documents for translation into frequently encountered languages to the City Recorder. Original documents being submitted for translation will be in final, approved form.

(b) The Town of Alexandria will set benchmarks for translation of vital documents into additional languages over time.

#### MONITORING LANGUAGE NEEDS AND IMPLEMENTATION

On an ongoing basis, the Town of Alexandria will assess changes in demographics, types of services or other needs that may require reevaluation of this policy and its procedures. In addition, the Town of Alexandria will regularly assess the efficacy of these procedures, including but not limited to mechanisms for securing interpreter services, equipment used for the delivery of language assistance, complaints filed by LEP persons, and feedback from the public and community organizations.