



City of Redmond Title VI Plan

City of Redmond – Executive Department

June 2, 2022

Malisa Files, Chief Operating Officer

Aaron Bert, Public Works Director

Prepared by: Lisa Maher, Deputy Executive
Email: lmaher@redmond.gov Phone: 425-556-2427

Table of Contents

I. Title VI Policy Statement	4
II. Organization, Staffing, and Structure	5
III. Primary Program Area Descriptions & Review Procedures	5
IV. Review Procedures	7
V. Program Area/Review Procedures	7
VI. Distribution of Title VI Information	8
VII. Title VI Training	9
VIII. Title VI Complaint Procedures	9
IX. Title VI Complaint Form	11
X. Public Participation	12
XI. Limited English Proficiency	13
XII. Environmental Justice	13
XIII. Notice of Title VI Rights	13

I. Title VI Policy Statement

It is the policy of the City of Redmond, Washington that no person shall on the grounds of race, color, and national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination in any operation of the City of Redmond as provided by Title VI of the Civil Rights Act of 1964 and related statutes.

This policy applies to all operations of the City of Redmond, including its contractors and anyone who acts on behalf of the City of Redmond. This policy also applies to the operations of any department or agency to which the City of Redmond extends federal financial assistance. Federal financial assistance includes grants, training, equipment usage, donations of surplus property, and other assistance.

Prohibited discrimination may be intentional or unintentional. Seemingly, neutral acts that have disparate impacts on individuals of a protected group and lack a substantial legitimate justification are a form of prohibited discrimination. Harassment and retaliation are also prohibited forms of discrimination.

Examples of prohibited types of discrimination based on race, color, or national origin include: denial to an individual any service, financial aid, or other benefit; distinctions in the quality, quantity, or manner in which a benefit is provided; segregation or separate treatment; restriction in the enjoyment of any advantages, privileges, or other benefits provided; discrimination in any activities related to highway and infrastructure or facility built or repaired; and discrimination in employment.

Title VI compliance is a condition of receipt of federal funds. The Title VI Coordinator is authorized to ensure compliance with this policy, Title VI of the Civil Rights Act of 1964, 42 USC § 2000d and related statutes, 42 USC 4601 to 4655; 23 USC 109(h); 23 USC 324; DOT Order 1050.2; EO 12250; EO 12898; 28 CFR 50.3 and 49 CFR part 21.

Signed: _____
Malisa Files, COO, City of Redmond

_____, 20____
Date

II. Organization, Staffing, and Structure

Chief Operating Officer, Malisa Files, is ultimately responsible for assuring full compliance with the provisions of Title VI of the Civil Rights Act of 1964 and related statutes and has directed that non-discrimination is required of all LPA employees, contractors, and agents pursuant to 49 CFR Part 21.

The City of Redmond has created the position of Diversity, Equity, and Inclusion Program Manager to perform the duties of the Title VI Coordinator and ensure implementation of their Title VI program. The position of Diversity, Equity, Inclusion Program Manager is located within the Executive Department.

The Title VI Coordinator is responsible for:

- Submitting a Title VI plan and annual reports on the agency’s behalf.
- Developing procedures for the prompt processing and disposition of complaints.
- Investigating complaints, compiling a complaint log, and reporting to WSDOT.
- Developing procedures for the collection and analysis of statistical data.
- Developing a program to conduct Title VI reviews of program areas.
- Conducting annual Title VI assessments of pertinent program areas.
- Developing Title VI information for dissemination.
- Establishing procedures for resolving deficiency status and reducing to writing the remedial action agreed to be necessary.

III. Primary Program Area Descriptions & Review Procedures

Title VI Coordinator’s Responsibilities and Program Administration

As authorized by the Agency Administrator, the Title VI Coordinator is responsible for initiating, monitoring, and ensuring the City of Redmond’s compliance with Title VI requirements as follows:

Program Area	General Description	Title VI/Non-Discrimination Concerns and Responsibilities	Review Procedures for Ensuring Non-Discrimination
Customer Service	Staff’s City facilities, customer service desks, and main City phone numbers	Log of special language service assistance activities to meet reporting requirements	Program liaison participates in biannual reviews of process for data collection effectiveness in compliance with Title VI provisions conducted by Title VI Coordinator
Communications & Marketing	Full-service communications office for both internal and external messaging and	- Dissemination of Title VI policy, programs, and activities to the community	Program liaison participates in biannual reviews of process for data collection effectiveness in compliance with Title VI

	community outreach	- Communication of public outreach activities, including public announcements, hearings, project notices, etc. in terms of Title VI and LEP compliance	provisions conducted by Title VI Coordinator
Construction Engineering	Delivers the City's capital improvement program to provide the infrastructure and facilities needed to support the city and community	All transportation-related contracts, including funding sources, Disadvantaged Business Enterprise (DBE) awards and contract amounts	Program liaison participates in biannual reviews of process for data collection effectiveness in compliance with Title VI provisions conducted by Title VI Coordinator
Human Resources	Oversight and implementation of City recruitment, staff training, benefits, job descriptions, pay plans, and labor contracts	In partnership with the Title VI Coordinator, conducts or facilitates training programs Title VI new regulations applicable to city staff, contractors, and subrecipients	Program liaison participates in biannual reviews of process for data collection effectiveness in compliance with Title VI provisions conducted by Title VI Coordinator
Transportation Planning & Engineering	Prepares, promotes, and implements the City's community vision	Tracking of transportation projects that identify potential impact to environmental justice populations	Program liaison participates in biannual reviews of process for data collection effectiveness in compliance with Title VI provisions conducted by Title VI Coordinator
Diversity, Equity, Inclusion and Title VI Program Administration	<p>- Ensures community can fully and effectively access city services, influence City policy and direction, and feels welcome.</p> <p>- Implements, monitors, and ensures City compliance with Title VI regulations and the overall administration of the Program Plan and assurances.</p>	<p>- Tracking, reviewing, and reporting of Title VI data</p> <p>- Processing complaints collected from the Title VI program area liaisons.</p> <p>- Updates Title VI Plan and provides information to other agencies and the community as requested or required.</p>	Program liaison participates in biannual reviews of process for data collection effectiveness in compliance with Title VI provisions conducted by Title VI Coordinator
Right of Way	Ensures equal opportunity in all aspects of procuring real estate service	Track data on awards to minority and female appraisers, follow Right of Way Manual for	Program liaison participates in biannual reviews of process for data collection effectiveness in

	contracting and appraisal agreements. Follow City of Redmond procurement policies in the acquisition of contracted services.	property acquisition as well as laws and regulation including Title Vi, ADA and Section 504. Ensure appraised values and communications associated with appraisal and negotiation operation result in equitable treatment.	compliance with Title VI provisions conducted by Title VI Coordinator
Design & Engineering	Responsible for Capital Improvement Projects (CIP) and environmental permitting for projects	Track studies are performed when needed to assess various environmental factors as they relate to implementation of the City's transportation capital program. Monitor compliance with Title VI requirements in all aspects of conducting Environmental	Program liaison participates in biannual reviews of process for data collection effectiveness in compliance with Title VI provisions conducted by Title VI Coordinator

IV. Review Procedures

The City of Redmond reviews each contract quarterly to ensure that contractors and their subrecipients are fulfilling the contracted Title VI performance requirements based on the criteria outlined in their City of Redmond contract, including an annual review of expenditures delivered, requirements, and the outcomes achieved.

V. Program Area/Review Procedures

Program Area	Type of Data Collected & Process for Collecting	Review Procedures
Customer Service	Language Services – reported by database management system and language applications. Ensures LEP community members can equitably access city services and Title VI information.	Review statistical gathering process performed by Title VI Specialist periodically to ensure sufficiency of data for meeting the requirements of Title VI administration.
Communications & Marketing	Tracking race/ethnicity in community meetings, annual surveys, and	Review statistical gathering process performed by Title VI Specialist

	<p>outreach. Tracking of website-related translation and accessibility tools as well as number of pieces of priority communication translated. Ensures Title VI information is available to all languages and city service information is accessible to all.</p>	<p>periodically to ensure sufficiency of data for meeting the requirements of Title VI administration.</p>
Human Resources	<p>Staff, contractor, and subrecipient training reported by number of trainings offered and number of people attended. Ensures Title VI best practices and updated information and regulations are shared and staff, contractors, and subrecipients are trained consistently.</p>	<p>Review statistical gathering process performed by Title VI Specialist periodically to ensure sufficiency of data for meeting the requirements of Title VI administration.</p>
Construction Engineering	<p>All transportation related contracts, including funding sources, Disadvantaged Business Enterprise (DBE) awards and contract amounts.</p>	<p>Review statistical gathering process performed by Title VI Specialist periodically to ensure sufficiency of data for meeting the requirements of Title VI administration.</p>
Human Resources	<p>Equal Employment Opportunity Commission (EEOC) and Department of Labor and Industries (L&I) annual reporting. Analyzes employee base and ensures it mirrors the community and adjusts recruitment efforts to attract a more diverse workforce.</p>	<p>Review statistical gathering process performed by Title VI Specialist periodically to ensure sufficiency of data for meeting the requirements of Title VI administration.</p>
Transportation Planning & Engineering	<p>Conducts community outreach, questionnaires, public hearings and community meetings. Obtain demographic information and statistics applicable community meetings and public hearings involving transportation planning. Tracks translated communications</p>	<p>Review statistical gathering process performed by Title VI Specialist periodically to ensure sufficiency of data for meeting the requirements of Title VI administration.</p>

VI. Distribution of Title VI Information

Work to develop and disseminate Title VI program information to Transportation Department staff and other City of Redmond Title VI Specialist, sub-recipients, including contractors, subcontractors, consultants, and sub-consultants, beneficiaries, and the public. Public dissemination may include inclusion of Title VI language in contracts or other agreements, and website postings. Ensure public announcements or notices of proposed projects, hearings, meetings, or formation of community advisory boards are posted in multiple communication platforms that may reach the affected

community. Ensure full utilization of cost-effective minority publications or media; and where appropriate, provide written or verbal information in languages other than English.

VII. Title VI Training

The City of Redmond Title VI Coordinator will attend annual (or as required) training with National Highway Institute (NHI), Federal Highway Administration (FHWA), and/or Washington State Department of Transportation (WSDOT) either online or in person.

In keeping with adopted City of Redmond policy of nondiscrimination, departmental procedures will be established or followed for Public Works employees to have equal access to applicable educational and training opportunities. Public Works staff will maintain program administration documentation and data necessary for preparation of annual Title VI reports and will routinely supply the necessary data to the Title VI Coordinator.

The City of Redmond Title VI Coordinator will partner with Human Resources to annually train and/or update Title VI liaisons on best practices and reporting. The Title VI Coordinator will coordinate the dissemination of training information to subrecipients via Title VI liaisons through printed materials, online/website information, and sharing of resources upon contracting with the City of Redmond. The Title VI Coordinator is responsible for overall Title VI related training and staff development for Title VI Specialists and other employees. The Coordinator will organize or conduct a minimum of one internal Title VI training session annually. The Coordinator will organize and facilitate the provision of Title VI training sessions for consultants, contractors, and subcontractors periodically. WSDOT's Office of Equal Opportunity may be asked to provide applicable training.

VIII. Title VI Complaint Procedures

The City of Redmond Title VI complaint procedure are disseminated to the public via the city's website in English, Spanish, and Chinese and available in other languages through the Google translate tool available on the website.

Discrimination Complaint Procedure for the City of Redmond

Federal law prohibits discrimination on the basis of race, color, or national origin in any City of Redmond program, service, or activity. This prohibition applies to all branches of the City of Redmond, its contractors, consultants, and anyone else who acts on behalf of the City of Redmond.

Complaints related to the Federal aid programs may be filed with the City of Redmond and will be forwarded to Washington State Department of Transportation – Office of Equal Opportunity. If assistance or interpretation services are needed to file a complaint, please contact Lisa Maher, Interim City of Redmond Title VI Coordinator.

Who is eligible to file a complaint?

A complaint can be file by anyone who believes they have been excluded from participation in, denied the benefits of, or otherwise subjected to discrimination under any City of Redmond program, service, or activity because of their race, color, or national origin.

Discrimination includes lack of access, harassment, retaliation and disparate impacts from a program or activity. Harassment includes a wide range of abusive and humiliating verbal or physical behaviors. Retaliation includes intimidating, threatening, coercing, or engaging in other discriminatory conduct against anyone because they filed a complaint or otherwise participated a discrimination investigation.

How do you file a complaint?

Complaints must be filed no later than 180 days from the last date of the alleged discrimination. Contact Lisa Maher, Interim Title VI Coordinator, if a complaint may fall outside this deadline.

Reasonable efforts will be made to assist persons with disabilities, non-English speakers, and others unable to file a written complaint. For assistance in filing a complaint, contact Lisa Maher, Interim City of Redmond Title VI Coordinator.

Complaints should be in writing, signed, and may be filed by mail, fax, in person, or e-mail. If a complainant phones the City of Redmond with allegations, the allegations of the complaint will be transcribed as provided by phone and then the written complaint will be sent to the complainant for correction and signature.

A complaint should contain the following information:

- The complainant's contact information, including, if available: full name, mailing address, phone number (and best time to call), and email address (if available);
- The basis of the complaint (e.g., race, color, national origin);
- The names of specific person(s) and/or agencies/organizations alleged to have discriminated;
- A description of the alleged discriminatory actions, meaning sufficient information to understand the facts that led the complainant to believe that discrimination occurred in a program or activity that receives Federal financial assistance; and
- The date(s) of the alleged discriminatory act(s) and whether the alleged discrimination is ongoing.

All Title VI complaints are logged. The Complaint log must contain the following information for each complaint filed:

- The name and address of the person filing the complaint.
- The date of the complaint.
- The basis of the complaint.
- The disposition of the complaint.
- The status of the complaint.

The Complaint Log and documentation are destroyed four years after the end of the fiscal year in which the case is closed. The City of Redmond then forwards complaints to WSDOT-Office of Equal Opportunity for processing by FHWA. [WSDOT investigates complaints only if delegated by FHWA after acceptance of a complaint.] FHWA is responsible for all determinations regarding whether to accept, dismiss, or transfer the complaint and finding no violation or failure to comply. Complainants have the right to file a complaint directly with the federal funding agency. The following address is where Title VI complaints may be filed directly with FHWA:

**Federal Highway Administration
 U.S. Department of Transportation Office of Civil Rights
 8th Floor E81-105
 1200 New Jersey Avenue, SE
 Washington, DC 20590
CivilRights.FHWA@dot.gov**

What happens after a complaint is filed?

If a complaint is forwarded to another agency, the complainant will be provided the name and contact information of the employee handling the complaint.

Federal law prohibits retaliation against individuals because they have filed a discrimination complaint or otherwise participated in a discrimination investigation. Any alleged retaliation should be reported in writing to the investigator.

FHWA will render final decisions in all cases including those investigated by WSDOT. There are no administrative appeal forums in Title VI complaints. Once FHWA issues its final agency decision, a complaint is closed.

There is no prohibition against a complainant filing a Title VI complaint simultaneously with Local Public Agency (LPA), WSDOT, and FHWA.

IX. Title VI Complaint Form

Please complete this form to the best of your ability. If you need translation or other assistance, contact Customer Service at 425-556-2900.

Name _____
 Address _____ City _____ Zip _____
 Phone: Home _____ Work _____ Mobile _____
 Best time of day to contact you about this complaint: _____
 Email: _____

Basis of Complaint (circle all that apply):

Race	Color	National Origin (includes language access)
------	-------	--

Date of alleged incident: _____
 Who discriminated against you?
 Name _____
 Name of Organization _____
 Address _____ City _____ Zip _____
 Telephone _____

Explain what happened, why you believe it happened, and how you were discriminated against. Indicate who was involved. Be sure to include how other persons were treated differently than you.

- Recruit diverse community advisory committees, stakeholder, and focus groups to advise City staff and provide input and feedback on priority projects and policy

XI. Limited English Proficiency

The City of Redmond consults demographic data to determine top-five non-English languages spoken in the Redmond community. Priority project staff leads are trained annually on best practices for communication and outreach to LEP groups by Title VI Coordinator. Annual updates of data from the American Community Survey regarding language usage and changes to racial makeup of residents. This information was used to determine which languages to translate basic city service information into for printed materials as well as on the city website <https://www.redmond.gov/984/New-Residents>. The city will conduct a Four-Factor Analysis and develop a process to address Safe Harbor and utilize the public involvement form to support collection and analysis of data. The City of Redmond will develop an LEP Plan in 2023 to ensure compliance with both Title VI of the Civil Rights Act of 1964 concerning access to services for people with Limited English proficiency.

XII. Environmental Justice

The City of Redmond is examining its use of resources and will develop measurable outcomes to address inequities in the Redmond community. Outcomes will focus on housing, health, and the environment. Community outreach both in person and via online questionnaires will be utilized in 2023 to inform the specific outcomes measured.

XIII. Notice of Title VI Rights

The City of Redmond Notice of Title VI rights is disseminated to the public on the city's website in English, Spanish, and Chinese. The Google Translate Application is available for all other translation needs.

Your Rights against Discrimination under Title VI of the Civil Rights Act of 1964

The City of Redmond hereby gives public notice that it is the Agency's policy to assure full compliance with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, and related statutes and regulations in all programs and activities. Title VI requires that no person shall, on the grounds of race, color, or national origin be excluded from the participation in, be denied the benefits of, or be otherwise subjected to discrimination under any Federal Aid Highway program or other activity for which Agency receives federal financial assistance.

Any person who believes they have been aggrieved by an unlawful discriminatory practice under Title VI has a right to file a formal complaint with the City of Redmond. Any such complaint filed with the City of Redmond Title VI Coordinator within 180 days following the date of the alleged discriminatory occurrence. Title VI discrimination Complaint Forms may be obtained from the Customer Service desk at Redmond City Hall or via the City website at www.Redmond.gov at no cost to the complainant.

To file a Title VI discrimination complaint, contact:

Lisa Maher
Interim, Title VI Coordinator
City of Redmond
P.O. Box 97010
Redmond, WA 98073-9710
titlevi@redmond.gov
425-556-2900

Washington Department of Transportation
Office of Equal Opportunity – Title VI
Box 47314
Olympia, WA 98504-7314
TitleVI@wsdot.wa.gov
Phone: (800) 259-9143

ATTACHMENT:

United States Department of Transportation (USDOT) 1050.2A, Standard Assurances with Appendices