

# TOMPKINS COUNTY TITLE VI PROGRAM PLAN

## Table of Contents

<a href="#"><u>Section I. Policy Statement</u></a>	2
<a href="#"><u>Section II. Overview</u></a>	2
<a href="#"><u>Section III. Organization and Responsibilities</u></a>	5
<a href="#"><u>Section IV. Data Collection and Analysis</u></a>	7
<a href="#"><u>Section V. Notice to the Public</u></a>	8
<a href="#"><u>Section VI. Public Participation</u></a>	9
<a href="#"><u>Section VII. Identification and Elimination of Discrimination</u></a>	10
<a href="#"><u>Section VIII. Title VI Training</u></a>	13
<a href="#"><u>Section IX. Limited English Proficiency (LEP) Plan</u></a>	13
<a href="#"><u>Section X. Interaction with Subrecipients, Contractors, and Sub-Contractors</u></a>	14
<a href="#"><u>Appendix A. Title VI Complaint Form</u></a>	15

## **Section I. Policy Statement**

Tompkins County is committed to promoting peace and good order, and the elimination of prejudice and discrimination. Social, recreational, and support services to County residents will be provided and made available in a coordinated, customer-friendly, and culturally sensitive manner.

In addition to its obligations under Title VI, Tompkins County is committed to equally serving all persons in all county programs or activities without discrimination on the basis of race, color, sex, gender identity and expression, sexual orientation, religion, age, national origin, alienage, disability, medical condition, military status, familial status, ex-offender status, or any other status or category protected by law (federal, state, or Tompkins County local law).

## **Section II. Overview**

### **1. Brief Introduction**

*What is the basis of authority of Title VI?*

Title VI, a federal statute enacted by Congress, provides that no person 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 funding/assistance.<sup>1</sup> Most agencies receiving federal funding/assistance also have their own regulations that effectuate or implement Title VI.

*To whom does Title VI apply?*

Title VI applies to recipients and subrecipients of federal funding/assistance. As a recipient of federal funding, Tompkins County is required to have a Title VI Program. Although contractors and subcontractors are not required to have their own Title VI Programs, they are responsible for complying with the Title VI Program of the recipient with whom they are contracting. Recipients are also responsible for ensuring that subrecipients, contractors, and sub-contractors follow the recipient's Title VI Program and comply with Title VI.

*What are the consequences if a recipient violates Title VI?*

The federal agency that provides funding/assistance to the violator must either initiate fund termination proceedings or refer the matter to the Department of Justice for appropriate legal action. Furthermore, aggrieved individuals may file administrative complaints with the federal agency that provided funding/assistance to the violator, or file suit for appropriate relief in federal court.

---

<sup>1</sup> 42 U.S.C. § 2000d

## 2. Legal Authority

### a. Primary Statutory Authority

#### **Title VI of the Civil Rights Act of 1964**

Title VI states: “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.”

Furthermore, the Civil Rights Restoration Act of 1987 clarified the broad, institution-wide application of Title VI to recipients of federal funding/assistance. Title VI covers all of the operations and programs of federal funding recipients regardless of which specific programs or activities of the recipient receive federal funding/assistance.

### b. Related Legal Authority

#### **Executive Order 13166 (2000): Limited English Proficiency (LEP)**

Executive Order 13166 requires agencies receiving federal funding/assistance to identify and develop services to ensure that persons with limited English proficiency have adequate access to the agency’s programs and services.

#### **Executive Order 12898 (1994): Environmental Justice (EJ)**

Executive Order 12898 provides for intergovernmental review of federally funded or assisted projects to ensure that they do not inadvertently interfere with state and local plans and priorities. This order requires every agency to incorporate environmental justice goals by identifying and addressing disproportionately adverse human health or environmental effects on minority and low-income populations.

#### **Title VI Regulation 49 C.F.R. § 21 (1970), Department of Transportation**

The U.S. Department of Transportation adopted 49 C.F.R. § 21 to effectuate the provisions of Title VI for any program or activity receiving federal funding/assistance from the Department of Transportation.

#### **Title VI Circular 4702.1B (2012), Federal Transit Administration**

Circular 4702.1B provides recipients of Federal Transit Administration funding/assistance with guidance and instructions necessary to effectuate 49 C.F.R. § 21 and to integrate into funded programs and activities considerations expressed in Department of Transportation’s Policy Guidance 70 FR 74087 on responsibilities toward limited English proficiency (LEP) persons.

#### **Americans with Disabilities Act of 1990 (ADA)**

The Americans with Disabilities Act provides that no qualified individual with a disability shall, by reason of his/her disability, be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination by a department, agency, special purpose district, or other instrumentality of a state or local government.

### **Section 504 of the Rehabilitation Act of 1973**

Section 504 provides that no qualified individual with a disability shall, solely by reason of his/her disability, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity that receives or benefits from federal financial assistance.

### **3. Title VI Program Requirements**

The following is a Quick Checklist of the Program elements:

- a. Title VI Notice to the Public that indicates the County's compliance with Title VI and informs members of the public of the protections against discrimination afforded to them by Title VI. The notice shall be posted in all public reception areas and public meeting areas.

Tompkins County's Title VI Notice to the Public can be found within this document: [Section V: Notice to the Public](#) and online at <http://www.tompkinscountyny.gov/tccp/titleVI>.

- b. Instructions to the public regarding how to file a Title VI discrimination complaint, including a copy of the Complaint Form.

Members of the public who feel discriminated against by Tompkins County under Title VI may exercise their right to file a complaint with the County Compliance Officer by following the County's complaint procedure. The complaint procedure is described within this document: [Section VII: Identification and Elimination of Discrimination](#).

- c. A list of any Title VI complaints, investigations, or lawsuits filed with the County to date. The list will be organized by case number and will include, but not be limited to, the following information: (1) date complaint was filed; (2) name and contact information of complainant; (3) protected category; (4) summary of allegation; (5) status of complaint as either active, completed, or pending; (6) actions taken; (7) disposition/Letter of Finding; and (8) name of investigator.
- d. Public Participation Plans for engaging minority populations, including persons with disabilities, and limited English proficiency (LEP) populations. The Plan will include a summary of annual outreach efforts.

This document's [Section VI: Public Participation](#) and [Section IX: Limited English Proficiency \(LEP\) Plan](#) describe Tompkins County's active outreach to promote public participation in County programs and services.

- e. Limited English Proficiency (LEP) plan for providing language assistance.

Tompkins County's LEP Plan is described in [Section IX: Limited English Proficiency \(LEP\) Plan](#) and is published online at: <http://www.tompkinscountyny.gov/tccp>.

- f. Description of efforts used by the County to ensure that subrecipients are complying with Title VI, as well as a schedule of subrecipients' Title VI program submissions.

Tompkins County actively monitors its subrecipients' compliance with Title VI requirements. [See Section X: Interaction with Subrecipients, Contractors, and Sub-Contractors.](#)

- g. If the County has constructed a facility, such as a vehicle storage facility, maintenance facility, operation center, etc., or has made renovations to an existing facility, including infrastructure, entrance ways, and other access points, the County shall include a copy of the Title II accessibility analysis conducted during the planning stage.

**Title II of the Americans with Disabilities Act (ADA) of 1990** covers programs, activities, and services of public entities. Title II provides protections to individuals with disabilities that are at least equal to those provided by the nondiscrimination provisions of Title VI. Title II provides that public entities must identify and evaluate all programs, activities, and services and review all policies, practices, and procedures that govern administration of the entity's programs, activities, and services, including barriers to accessibility.

### **Section III. Organization and Responsibilities**

#### **1. Title VI Oversight**

There shall be a County Compliance Officer who shall be appointed by the County Administrator. The County Compliance Officer shall have executive oversight of Title VI Program implementation. It is the responsibility of all County departments to demonstrate Title VI compliance; however, the County Compliance Officer will provide the following assistance:

- a. Provide guidance to departments on general Title VI matters, ensuring overall compliance;
- b. Develop monitoring procedures and initiate monitoring activities for:
  - i. timely processing and resolution of Title VI complaints;
  - ii. identification of potential Title VI-related barriers that may negatively impact beneficiaries of County services (such as review of the ADA Transition Plan);
  - iii. identification and elimination of deficiencies in the County's implementation of its Title VI Program;
  - iv. routine review of subrecipients, contractors, and sub-contractors' compliance with Title VI requirements, as required;
- c. Where required by law, work with County departments to collect data on the race, color, national origin, sex, age, income, and disability status of beneficiaries of the County's programs and services; provide a comprehensive analysis of such data in accordance with [Section IV: Data Collection and Analysis](#);

- d. Conduct an annual Title VI review of each department within the county as well as a review of subrecipients, contractors, and subcontractors; create an annual report of the County's Title VI accomplishments and upcoming goals; where applicable, update the County's Title VI Program to reflect organizational, policy, or implementation changes;
- e. Ensure that Title VI requirements are included in the County's policy directives and that those directives are sensitive to Title VI requirements;
- f. Coordinate ongoing development and implementation of the County's Training Program for Title VI and related law;
- g. Where appropriate, assist with the development of Title VI information for public dissemination in languages other than English.

## **2. Title VI Department Coordinators**

Additionally, the County shall designate one Title VI Department Coordinator for each department within the County. Department Coordinator may be the head of a department or some other person as the department head deems appropriate.

The County Compliance Officer shall maintain a current list of all Tompkins County Title VI Department Coordinators, including name, position, and contact information.

The Department Coordinators shall work in concert with and have direct access to the County Compliance Officer. Department Coordinators ensure that their respective departments comply with the County's Title VI Program. The duties of the Department Coordinators include, but are not limited to, the following:

- a. Assist the County Compliance Officer in providing training for relevant personnel;
- b. Assist the County Compliance Officer in ascertaining subrecipients, contractors, and sub-contractors' Title VI compliance; and ensure that Title VI provisions are included in contractual agreements with all subrecipients, contractors, and sub-contractors;
- c. Assist the County Compliance Officer in collecting and analyzing statistical data on race, color, national origin, sex, age, income, and disability status of beneficiaries of County services and programs in accordance with [Section IV: Data Collection and Analysis](#);
- d. Use collected data to complete an annual summary of the progress, achievements, and applicable deficiencies of each department's implementation and compliance with the County's Title VI Program in accordance with [Section IV: Data Collection and Analysis](#); departmental reports will be incorporated into the County's comprehensive analysis.

## **Section IV. Data Collection and Analysis**

### **1. Overview**

Tompkins County shall collect and review relevant data and information in order to assess its implementation of and compliance with its Title VI Program. The County shall also provide data and information to federal agencies as required by federal regulations.

### **2. Agency Access to Data and Information**

As requested, the County shall provide agencies from which it receives federal funding/assistance access to data and information necessary to ascertain its Title VI compliance, including access to pertinent books, records, accounts, facilities, and other sources of information.

The County shall also provide data and information as required by 28 C.F.R. § 42.406 as requested in conjunction with a new application for federal funding, an application for continuance or renewal of funding with specific projects or significant changes, and at other times appropriate under the regulation.

### **3. County Program Participant and Beneficiary Data**

The County shall reasonably gather, analyze, and retain statistical data on the race, color, national origin, sex, age, income, and disability status of beneficiaries of its services and programs. The County shall identify the programs and services most appropriate for analysis. The County shall analyze the data to determine whether benefits from County services are fairly distributed, especially among minority and low-income populations.

To assist the County in analyzing fair distribution of benefits and burdens, each department within the County shall maintain relevant data on identified programs appropriate for analysis. Additionally, if the County extends federal funding/assistance to a subrecipient, the subrecipient shall collect, retain, and submit such data to the County in order to enable the County to carry out its civil rights compliance obligations. Data submitted by subrecipients shall also be incorporated into the County's comprehensive analysis.

*Self-Identification:* From time to time, the County may find it necessary to request voluntary identification of racial, ethnic, or other relevant information from those who participate in its public events or utilize its services. This information will assist the County in improving its targeted outreach and measures of effectiveness. Self-identification of personal information to the County will always be voluntary and anonymous. Moreover, the County will not release or otherwise use these data in any manner inconsistent with federal and state regulations.

*Race and Ethnicity Codes:* Self-identification surveys shall include the following race and ethnicity codes, in the combined format as structured by the federal Office of Management and Budget:

- American Indian or Alaska Native
- Asian or Pacific Islander
- Black or African American
- Hispanic or Latino
- Multiracial or Other
- Native Hawaiian or other Pacific Islander
- White (not of Hispanic origin)

All surveys shall note that participants may include multiple responses.

## **Section V. Notice to the Public**

### **1. Introduction**

Tompkins County must inform the public of their rights under Title VI, including that the County operates without discrimination on the basis of race, color, or national origin; that the public may request information about the County’s Title VI obligations; and procedures that may be taken if a person believes he or she has been discriminated against.

### **2. Public Notice - Preferred Language**

The paragraph below shall be inserted into all significant publications distributed to the public, and shall also be available on the County’s website:

*Under Title VI of the Civil Rights Act of 1964, any person who believes he or she has been aggrieved by an unlawful discriminatory practice on the basis of race, color, or national origin has the right to file a formal complaint with the County. Any such complaint must be in writing and filed with the County Compliance Officer within 180 days following the date of the alleged discriminatory occurrence. Title VI Discrimination Complaint Forms may be obtained online at <http://www.tompkinscountyny.gov/tccp> or from the Department of County Administration, 125 East Court Street, 3rd Floor, Ithaca NY 14850.*

*In addition to its obligations under Title VI, Tompkins County is committed to equally serving all persons in all county programs or activities without discrimination on the basis of race, color, sex, gender identity and expression, sexual orientation, religion, age, national origin, alienage, disability, medical condition, military status, familial status, ex-offender status or any other status or category protected by law (federal, state, or Tompkins County local law).*

### **3. Short Notice – Alternative Text**

*Tompkins County in all programs and services complies with all non-discrimination laws including Title VI of the Civil Right Act of 1964 and related statutes and regulations. For more information or to obtain a Title VI Discrimination Complaint Form, please visit our website at <http://www.tompkinscountyny.gov/tccp> or our offices at the Department of County Administration, 125 East Court Street, 3rd Floor, Ithaca NY 14850.*

#### **4. Notice Posting**

Title VI notices shall be included in all applicable County or project documents and public meeting materials. Notices shall also be posted in all languages necessary to follow County LEP guidance in [Section IX: Limited English Proficiency \(LEP\) Plan](#). Additional translations shall be made available upon request.

Tompkins County shall disseminate information regarding its Title VI obligations to the general public by posting the above Public Notice (*see* Section V.2) in public areas, including but not limited to County offices, bulletin boards, and transit buses. The Short Notice version may be used where space is limited or in publications where cost is an issue.

Additionally, Tompkins County shall have its Title VI Program Plan available for public access on the County website at <http://www.tompkinscountyny.gov/tccp/titleVI>. Upon request, hard copies of the Title VI Program Plan may be mailed to individual members of the public.

### **Section VI. Public Participation**

#### **1. Introduction**

Title VI seeks to ensure the full and fair participation of all community members potentially affected by public decision-making processes. In addition to notifying the public of their Title VI rights, it is the responsibility of the County to actively engage the public, especially minority and low-income populations, in planning projects that affect them.

Tompkins County shall seek out and consider the viewpoints of minority, low-income, and LEP populations in the course of conducting public outreach and involvement activities.

#### **2. Methods of Ensuring Public Participation**

##### **a. Category 1 - Continuous Public Participation:**

The public should always be able to contact government officials to ask questions or express concerns and ideas for consideration. The County shall provide the public an opportunity for public comment, both online and via written suggestion cards.

##### **b. Category 2 - Public Participation Preceding Major Public Decisions:**

Major public decisions are proposed actions that may have a profound impact on the general public, for example, consolidation or discontinuation of a long-standing program. A change that has a profound impact on only a select group of individuals is still considered a major decision. The importance of the topic, and to what length it will be addressed, will determine the number of meetings required and the amount of promotion required for such meetings.

Public meetings shall be held in locations accessible to mobility-impaired individuals and

those with disabilities. Public meeting notices shall include text that clearly expresses compliance with this requirement. Additionally, individuals planning to attend the meeting shall have the opportunity to request special accommodation so that they may fully participate.

When selecting a meeting location, preference shall be given to locations near public transit routes. If a public meeting is focused on a specific geographic area or jurisdiction, the meeting shall be held within that geographic area or jurisdiction.

When setting times and dates for public meetings, staff will review when other major community meetings and events are scheduled in order to minimize conflicts and accommodate the maximum number of potential participants.

In addition to public meetings, the County may promote public participation through direct mailings; feedback surveys; coordinated efforts with educational and faith-based organizations; radio, television, or newspaper advertisements, including those media channels that serve LEP, low-income, or minority populations; non-written public comment procedures, such as personal interviews; or any other method deemed appropriate under the circumstances.

### **3. Stakeholder Outreach**

The County shall develop and maintain a list of stakeholders, consisting of interested and affected parties. This list will be used to inform individuals, groups, and agencies about the development of a plan or program and to notify them about specific opportunities for public involvement.

The list of stakeholders shall include, but not be limited to:

- a. Business representatives
- b. Educational institutions (public and private schools and universities)
- c. Directly and indirectly impacted members of the general public
- d. Government partners (local, state, and federal officials)
- e. Human service and non-profit agencies
- f. Individuals and interest groups
- g. Local media outlets
- h. Neighborhood associations
- i. Transit and taxi operators
- j. Special interest transit users (bicyclists, disabled users, etc.)

## **Section VII. Identification and Elimination of Discrimination**

### **1. Proving Discriminatory Conduct**

There are two ways to prove illegal discrimination prohibited under Title VI and related statutes.

One way is to prove “disparate treatment,” which focuses on the discriminatory intent of a challenged action. Disparate treatment is defined as treating similarly situated persons or groups differently because of their protected status or category.

The second way is to prove “disparate impact.” Disparate impact discrimination occurs when a “neutral procedure or practice” results in fewer services or benefits, or inferior services or benefits, to members of a protected group. Disparate impact analysis focuses on the consequences of a decision, policy, or practice rather than discriminatory intent.

The County’s efforts to prevent such discrimination must address, but not be limited to, a program’s impacts, access, benefits, participation, treatment, services, contracting opportunities, training, investigation of complaints, allocation of funds, prioritization of projects, as well as the overarching functions of research and planning, project development and delivery, right-of-way, and construction. Tompkins County has developed this Title VI Program to assure its services, programs, and activities are offered, conducted, and administered fairly without regard to race, color, or national origin, in the context of the County’s broader commitment to serving the public without discrimination.

## 2. Title VI Complaints

Tompkins County shall inform the public of their rights under Title VI consistent with [Section V. Notice to the Public](#), including (1) that the County operates without discrimination on the basis of race, color, and national origin; (2) that the public can request additional information about the obligations of the County; and (3) that there are procedures that can be taken if a person feels he or she has been discriminated against.

**Any person who believes he or she has faced unequal treatment or discrimination concerning the receipt of benefits and/or services has the right to file a written complaint in accordance with the complaint procedures listed below (see Section VII.3).**

These procedures cover all complaints filed under Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, the Civil Rights Restoration Act of 1987, and the Americans with Disabilities Act of 1990, relating to any program or activity administered by the County as well as by subrecipients, consultants, and contractors. Intimidation or retaliation of any kind is prohibited by law.

The procedures do not deny the right of the complainant to file formal complaints with other state or federal agencies or to seek private counsel for complaints alleging discrimination. Every effort will be made to obtain early resolution of complaints at the lowest level possible. The option of informal mediation involving the affected parties and the County may be utilized to seek resolution of such complaints.

## 3. Complaint Procedures

- a. Any person who believes that he or she (individually or as a representative of any specific group or class, or in connection with any minority-owned or women-owned

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 Tompkins County (see [Appendix A: Title VI Complaint Form](#)). A complaint may also be filed by a lawful representative on behalf of such a person. All complaints will be referred to the Tompkins County Compliance Officer for review and action. **Complaints must be filed within 180 days of the alleged discrimination.** If the complainant could not reasonably be expected to know within the 180 day period that the act was discriminatory, she or he will have 60 additional days after becoming aware of the illegal discrimination to file the complaint.

- b. Complaints shall be in writing and signed by the complainant. Complaints shall set forth as fully as possible the facts and circumstances surrounding the discrimination claim. If necessary, the Tompkins County Compliance Officer will assist the complainant in drafting the complaint and will submit the written draft of the complaint to the person for signature. The complaint shall then be handled in the usual manner.
- c. Within 10 working days, the Tompkins County Compliance Officer will acknowledge receipt of the complaint, inform the complainant of action taken or proposed action to process the complaint, and advise the complainant of other avenues of redress available.
- d. The following information will be obtained for processing and investigation of all complaints:
  - i. Name(s), address(es), and phone number(s) of the complainant(s);
  - ii. Name(s), address(es) of alleged discriminating official(s);
  - iii. Basis of complaint (e.g., race, color, or national origin);
  - iv. Date of alleged discriminatory act(s);
  - v. Date the complaint was received by the County Compliance Officer;
  - vi. A statement of the complaint;
  - vii. Other agencies (state, local, or federal) where the complaint has been filed;
  - viii. An explanation of actions the County may have already taken or already proposed to resolve the issue raised in the complaint;
- e. Within 60 working days of receipt of the complaint, the Tompkins County Compliance Officer will conduct an investigation and, based on the information obtained, will render a recommendation for action in a Report of Findings. The complaint will be resolved by informal means whenever possible. Such informal attempts and their results will be summarized in the report findings.
- f. Within 90 working days of receipt of the complaint, the Tompkins County Compliance Officer will notify the complainant in writing of the final decision reached, including proposed disposition of the matter.

## **Section VIII. Title VI Training**

The County will cover Title VI Compliance as a part of its annual compliance training given to department heads, administrators, managers, and staff. The training program shall be informed by the *Title VI Legal Manual* published by the Department of Justice. The Manual provides an overview of the legal principles governing Title VI. The goals of the training are to enable participants to understand the key requirements of Title VI, be familiar with the County's Title VI Program, recognize the roles and responsibilities for implementation, discuss the data that the County collects for Title VI purposes, and articulate thoughts and strategies for preventing discrimination.

The County's training program shall include, but not be limited to, the following topics:

1. What generally constitutes prejudice and discrimination;
2. Background, purpose, and legislative authority of Title VI;
3. Requirements of and prohibited practices under Title VI;
4. Overview of the County's Title VI Program;
5. Overview of purpose and requirements under Executive Order 13166 (LEP).

Title VI training materials will also be provided to subrecipients, contractors, and sub-contractors of Tompkins County. Furthermore, while each subrecipient shall develop its own customized Title VI program, it may use the County's Title VI Program as a model. For further information on monitoring of subrecipients, see [Section X: Interaction with Subrecipients, Contractors, and Sub-Contractors](#).

## **Section IX. Limited English Proficiency (LEP) Plan**

As defined by Executive Order 13166, limited English proficiency (LEP) individuals are persons who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English. This plan also covers interpreter services to deaf and hard of hearing persons under the Americans with Disabilities Act and New York State law.

Tompkins County strives to provide accurate and effective communication with members of the public, regardless of their level of English proficiency. It is Tompkins County's policy to take reasonable steps to overcome language barriers regarding access to Tompkins County programs or activities, at no cost to the LEP individual. The County's [LEP Plan](#) outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, staff training that may be required, and how to notify LEP persons that assistance is available.

## **Section X. Interaction with Subrecipients, Contractors, and Sub-Contractors**

### **1. Monitoring of Subrecipients, Contractors, and Sub-Contractors**

Tompkins County shall monitor and ensure that its subrecipients, contractors, and sub-contractors comply with all Title VI Requirements. All subrecipients, contractors, and sub-contractors must submit to the County, upon request, the following documents:

- a. **Assurance of Compliance:** A written assurance that the relevant program, service, or facility will be conducted or operated in compliance with Title VI requirements;
- b. **Notice to Beneficiaries:** Title VI notice to the public that indicates the subrecipient both complies with Title VI requirements and informs the public of the protections against discrimination that Title VI affords. Subrecipients are also required to submit a list of locations where the notice is posted;
- c. **Title VI Discrimination Complaint Instructions:** A copy of the subrecipient's instructions to the public regarding how to file a Title VI discrimination complaint, and a copy of the blank complaint form;
- d. **List of any related Title VI investigations, complaints, or lawsuits filed:** The list should include investigations, complaints, or lawsuits that pertain to allegations of discrimination on the basis of race, color, and national origin in programs or services related to the purpose for which the subrecipient received federal funding/assistance. Subrecipients shall, upon request, submit an annual report of Title VI complaints;
- e. **Public Participation Plan:** Subrecipients are required to submit annually a description of the public outreach planned to engage minority and limited English proficiency populations. A subrecipient's outreach plan can also be part of its larger efforts extending to other traditionally underrepresented populations, such as persons with disabilities or low-income individuals;
- f. **Limited English Proficiency (LEP) Plan:** Subrecipients are required to submit a description of a plan to provide language assistance to persons with limited English proficiency.
- g. **Table depicting racial breakdown of committees, advisory councils or similar bodies:** Subrecipients that have planning boards, advisory councils or advisory committees, or other similar bodies, the membership of which is selected by the subrecipient, must provide a table depicting the racial breakdown of the membership of those bodies, and a description of efforts made to encourage the participation of minorities in the activities of such bodies.



TITLE VI COMPLAINT FORM

Notice: If you are unable to use this complaint form, please contact the Department of County Administration at 607-274-5551 to arrange an alternate means of filing a complaint.

Complaint Forms must be filed within 180 days of the alleged discrimination to:

Tompkins County Compliance Officer
Department of County Administration
125 East Court Street, Old Jail Building, 3rd Floor
Ithaca, New York 14850

I. INFORMATION ABOUT THE COMPLAINANT

Name: \_\_\_\_\_ Date: \_\_\_\_\_
(Please print First Name and Last Name)

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

Home Phone: \_\_\_\_\_ Work Phone: \_\_\_\_\_ Email Address: \_\_\_\_\_

Designated Person to contact if you cannot be reached:

Name \_\_\_\_\_ Relationship \_\_\_\_\_ Phone: \_\_\_\_\_

II. INFORMATION ABOUT THE COMPLAINT

(Please provide the following information about the alleged County staff person/department you believe discriminated against you.)

Name (of County staff person): \_\_\_\_\_ Title: \_\_\_\_\_

County Department: \_\_\_\_\_ Date of alleged discriminatory act(s): \_\_\_\_\_

Basis of complaint (e.g., race, color, national origin, disability, etc.):

[Empty box for basis of complaint]

Please explain as clearly as possible what happened and why you believe you were discriminated against:

[Empty box for explanation of discrimination]

Please indicate other agencies (Local, State, or Federal) where this same complaint has been filed:

[Empty box for other agencies]

Please indicate a suggested remedy you propose or an explanation of the actions the County has taken or proposed to resolve the issue raised in the complaint:

[Empty box for suggested remedy]

Completed by: \_\_\_\_\_
(Complainant Signature or Signature of Complainant's Representative)

III. ROUTING AND PROCESSING (OFFICE USE ONLY)

Complaint submitted: [ ] In Person [ ] USPS Mail [ ] Fax [ ] Email [ ] Online (via County website)

Compliant Form received by: \_\_\_\_\_ Date: \_\_\_\_\_
(Please print both First and Last Name of County Representative)