



City of Berkeley, Missouri

Title VI Program

Adopted by the City Council:
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Ordinance #4363

Title VI Plan **Table of Contents**

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Introduction/ Title VI Assurances

The City of Berkeley, Missouri is dedicated to an inclusive planning process that allows all citizens affected by the City's activities to have a voice. The City has no sub recipients of federal funds nor has it constructed any transportation related facilities with federal funds. The City of Berkeley agrees to comply with all provisions prohibiting discrimination on the basis of race, color, or national origin of Title VI of the Civil Rights Act of 1964, as amended, 42 U.S.C. 200d *et seq.*, and with U.S. DOT regulations, "Nondiscrimination in Federally-Assisted Programs of the Department of Transportation – Effectuation of Title VI of the Civil Rights Act," 49 CFR part 21.

The City of Berkeley assures that no person shall, as provided by Federal and State civil rights laws, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity. The federal regulatory authority for non-discrimination originates in three areas: Title VI of the Civil Rights Act of 1964; the Americans with Disabilities Act of 1990 and Executive Order 13166 related to citizens with limited English proficiency. All three are illustrated more fully below.

It has been The Federal Highway Administration's (FHWA's) and the Federal Transit Administration's (FTA's) longstanding policy to actively ensure nondiscrimination under **Title VI of the 1964 Civil Rights Act** in federally funded activities. Under Title VI and related statutes, each Federal agency is required to ensure that no person is excluded from participation in, denied the benefit of, or subjected to discrimination under any program or activity receiving Federal financial assistance on the basis of race, color, gender, or national origin. The Civil Rights Restoration Act of 1987 clarified the intent of Title VI to include all programs and activities of Federal-aid recipients, sub-recipients and contractors whether those programs and activities are federally funded or not." (Source: United States Department of Transportation)

The **Americans with Disabilities Act of 1990** (ADA) prohibits discrimination and ensures equal opportunity for persons with disabilities in employment, State and local government services, public accommodations, commercial facilities, and transportation. It also mandates the establishment of TDD/telephone relay services. To be protected by the ADA, one must have a disability or have a relationship or association with an individual with a disability. An individual with a disability is defined by the ADA as a person who has a physical or mental impairment that substantially limits one or more major life activities, a person who has a history or record of such impairment, or a person who is perceived by others as having such impairment. (Source: www.ADA.gov)

On August 11, 2000, the President signed **Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency"**. The Executive Order requires Federal agencies to examine the services they provide, identify any need for services to those with limited English proficiency (LEP), and develop and implement a system to provide those services so LEP persons can have meaningful access to federally conducted and federally assisted programs. It is expected that agency and program plans, as stipulated by the Executive Order, will provide for such meaningful access consistent with, and without unduly burdening, the fundamental mission of the agency. The U.S. Department of Justice's Policy Guidance Document, "Enforcement of Title VI of the Civil Rights Act of 1964 - National Origin Discrimination Against Persons With

Limited English Proficiency" (LEP Guidance) sets forth the compliance standards that recipients of Federal financial assistance must follow to ensure that their programs and activities normally provided in English are accessible to LEP persons and thus do not discriminate on the basis of national origin in violation of Title VI's prohibition against national origin discrimination. (Source: www.lep.gov)

The City of Berkeley further ensures every effort will be made to ensure non-discrimination in all programs and activities, whether those programs and activities are federally funded or not.

The City of Berkeley meets the objectives of the FTA Master Agreement which governs all entities applying for FTA by promoting actions that:

- A. Ensure that the level and quality of transportation service is provided without regard to race, color, or national origin.
- B. Identify and address, as appropriate, disproportionately high and adverse effects of programs and activities on minority populations and low-income populations.
- C. Promote the full and fair participation of all affected Title VI populations in transportation decision making.
- D. Prevent the denial, reduction, or delay in benefits related to programs and activities that benefit minority populations or low-income populations.
- E. Ensure meaningful access to programs and activities by persons with Limited English Proficiency (LEP).

Agency Information

The City of /Berkeley is located in North St. Louis County with a portion of the Lambert St. Louis International Airport lying within the city's boundaries. It was incorporated in 1937 and as of the 2010 US Census, the population of the City of Berkeley was at 8,978. Important major roads that run through Berkeley are Interstate 70, Interstate 170, North Hanley Road, Frost Avenue, Airport Road, McDonnell Blvd, natural Bridge and others. The population served for the City of Berkeley is African American 81.4 % (7,312); Caucasian 12.9% (1,154); Hispanic 3.5% (312); Two or more races 1.4% (128); Asian alone 0.4% (33); American Indian 0.2% (19); Other race alone 0.2% (16); Native Hawaiian and other Pacific Islander alone .04% (4). The City of Berkeley is run by a city council which consists of seven members: Mayor, Council Person-at Large, 5 council people. All council members are elected for a four-year term. The city's general election is held every even year.

The City of Berkeley provides transportation services to its senior citizen population, 55 years and older, as well as to its disabled citizens. If a person is 55 years and older and has their own transportation, they will not be allowed to use the service unless they have a note from their doctor stating they are unable to drive. The senior citizen population makes up about 23% of the residents. The City of Berkeley is committed to bringing services to seniors as a group or individual, providing them with transportation, activities, information comradery and awareness of medical and other issues of interest to them. The City of Berkeley started the Senior Club in 1954 with the purpose of bringing together seniors. The Senior Transportation Services began in the 1970's and was rebooted in 1993 and is still in operation. The Senior Transportation Service covers a large swath of area from St. Louis City and County, Jefferson County, St. Charles County, Madison County Illinois and St. Clair Illinois (See Attachment 1 for map).

The City of Berkeley is a planned progressive community. It is the headquarters of the Fortune 500 Company, Express Scripts and home to many industrial leaders. It is the goal of the elected body, administration, and staff to maintain sound fiscal responsibility while delivering excellent service to the residents and businesses to locate and families to live.

Notifying the Public of Rights under Title VI

The City of Berkley posts Title VI notices on our agency's website, in public areas of our agency, and on our buses.

The City of Berkeley operates its programs and services without regard to race, color, or national origin, in accordance with Title VI of the Civil Rights Act of 1964.

For more information on the City of Berkeley's Title VI program, and the procedures to file a complaint, contact Human Resources at 314-524-3313; or visit our administrative office at 8425 Airport Road, Berkeley, MO 63134. For more information visit www.cityofberkeley.us.

If you believe you have been discriminated against on the basis of race, color, or national origin by the City of Berkeley, you may file a Title VI complaint by completing, signing, and submitting the agency's Title VI Complaint Form.

How to file a Title VI complaint with City of Berkeley

1. Complaint Forms (Attachment 2) are available at the reception desk at City Hall of the City of Berkeley, located at 8425 Airport Road, Berkeley, MO 63134 or by calling 314-524-3313 and requesting a copy or website address.

2. In addition to the complaint process at the City of Berkeley, complaints may be filed directly with the Federal Transit Administration, Office of Civil Rights, Region 6, Attn: Title VI Program Coordinator, 400 7th Street, SW Room 9100, Washington, DC 20590.
3. Complaints must be filed within 180 days following the date of the alleged discriminatory occurrence and should contain as much detailed information about the alleged discrimination as possible.
4. The form must be signed and dated, and include your contact information. If information is needed in another language, contact 816-461-4287.

Procedure for Filing a Title VI Complaint

Filing a Title VI Complaint

The complaint procedures apply to the beneficiaries of the City of Berkeley's programs, activities, and services.

RIGHT TO FILE A COMPLAINT: Any person who believes they have been discriminated against on the basis of race, color, or national origin by the City of Berkeley may file a Title VI complaint by completing and submitting the agency's **Title VI Complaint Form**. Title VI complaints must be received in writing within 180 days of the alleged discriminatory complaint.

HOW TO FILE A COMPLAINT: Information on how to file a Title VI complaint is posted on our agency's website, and in public areas of our agency.

You may download the City of Berkeley Title VI Complaint Form at www.cityofberkeley.us, or pick up a copy from the at the reception desk at City Hall of the City of Berkeley, located at 8425 Airport Road, Berkeley, MO 63134 or request a copy by writing to Human Resources, City of Berkeley, MO, 8425 Airport Road, Berkeley, MO 63134. Information on how to file a Title VI complaint may also be obtained by calling Human Resources at 314-524-3313.

You may file a signed, dated complaint no more than 180 days from the date of the alleged incident. The complaint should include:

- Your name, address and telephone number.
- Specific, detailed information (how, why and when) about the alleged act of discrimination.
- Any other relevant information, including the names of any persons, if known, the agency should contact for clarity of the allegations.

Please submit your complaint form to Human Resources, City of Berkeley, MO, 8425 Airport Road, Berkeley, MO 63134.

COMPLAINT ACCEPTANCE: the City of Berkeley will process complaints that are complete.

Once a completed Title VI Complaint Form is received, Human Resources will review it to determine if the City of Berkeley has jurisdiction. The complainant will receive an acknowledgement letter informing them whether or not the complaint will be investigated by the City of Berkeley.

INVESTIGATIONS: the City of Berkeley will generally complete an investigation within 90 days from receipt of a completed complaint form. If more information is needed to resolve the case, Human Resources may contact the complainant. Unless a longer period is specified by the City of Berkeley, the complainant will have ten (10) days from the date of the letter to send requested information to the City of Berkeley investigator assigned to the case.

If the requested information is not received within that timeframe the case will be closed. Also, a case can be administratively closed if the complainant no longer wishes to pursue the case.

LETTERS OF CLOSURE OR FINDING: After the Title VI investigator reviews the complaint, the Title VI investigator will issue one of two letters to the complainant: a closure letter or 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.

- A Letter of Finding (LOF) summarizes the allegations and provides an explanation of the corrective action taken.

If the complainant disagrees with the City of Berkeley's determination, the complainant may request reconsideration by submitting the request in writing to the Title VI investigator within seven (7) days after the date of the letter of closure or letter of finding, stating with specificity the basis for the reconsideration. The City of Berkeley will notify the complainant of the decision either to accept or reject the request for reconsideration within ten (10) days. In cases where reconsideration is granted, the City of Berkeley will issue a determination letter to the complainant upon completion of the reconsideration review.

A person may also file a complaint directly with the Federal Transit Administration, at the FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.

If information is needed in another language, contact 816-461-4287.

Monitoring Title VI Complaints, Investigations, Lawsuits and Documenting Evidence of Agency Staff Title VI Training

Documenting Title VI Complaints/Investigations

All Title VI complaints will be entered and tracked in the City of Berkeley's complaint log. Active investigations will be monitored for timely response on the part of all parties. The agency's Title VI Coordinator shall maintain the log.

Agency Title VI Complaint Log

Date complaint filed	Complainant	Basis of complaint R-C-NO	Summary of allegation	Pending status of complaint	Actions taken	Closure Letter (CL)	Letter of Finding (LOF)	Date of CL or LOF

Documenting Evidence of Agency Staff Title VI Training

The City of Berkeley's staff are given Title VI training, and agency can answer affirmatively to all the following questions:

1. Are new employees made aware of Title VI responsibilities pertaining to their specific duties?
2. Do new employees receive this information via employee orientation?
3. Is Title VI information provided to all employees and program applicants?
4. Is Title VI information prominently displayed in the agency and on any program materials distributed, as necessary?

Public Engagement Plan

Goal

The goal of the Public Engagement Plan is to have significant and ongoing public involvement, by all identified audiences, in the public participation process for major agency outreach efforts.

Objectives

- To understand the service area demographics and determine what non-English languages and other cultural barriers exist to public participation.
- To provide general notification of meetings and forums for public input, in a manner that is understandable to all populations in the area.
- To hold public meetings in locations that are accessible to all area stakeholders, including but not limited to minority and low income members of the community.
- To convey the information in various formats to reach all key stakeholder groups.

Identification of Stakeholders

Stakeholders are those who are either directly or indirectly affected by an outreach effort, system or service plan or recommendations of that plan. Stakeholders include but are not limited to the following:

- City of Berkeley City Council members–The City Council defines the agency’s mission, establishes goals, and approves the budget to accomplish the goals.
- City of Berkeley Senior Transport riders
- Minority and low income populations, including limited English proficient persons.

Elements of the Public Engagement Plan

It is necessary to establish a public participation plan that includes an outreach plan to engage minority and limited English proficient (LEP) populations.

Elements of the Public Engagement Plan include:

1. Public Notice

- a. Official notification of intent to provide opportunity for members of the general public to participate in public engagement plan development, including participation in open Board/council meetings, and advisory committees.

2. Public Engagement Process/Outreach Efforts:

- a. Public meetings
- b. Open houses
- c. Public hearings
- d. Services for the Disabled (Notices of opportunities for public involvement include contact information for people needing these or other special accommodations.)

Events such as public meetings and/or open houses are held at schools, churches, libraries and other non-profit locations easily accessible to public transit and compliant with the Americans with Disabilities Act.

3. Public Comment

- a. Formal public comment periods are used to solicit comments on major public involvement efforts around an agency service or system change.
- b. Comments are accepted through various means:
 - i. Dedicated email address.
 - ii. Regular mail.
 - iii. Phone calls to City of Berkeley's Human Resources at 314-524-3313.

4. Response to Public Input

All public comments are provided to the Berkeley City Council prior to decision making. A publicly available summary report is compiled, including all individual comments.

Title VI Outreach Best Practices

The City of Berkeley ensures all outreach strategies, communications and public involvement efforts comply with Title VI. The City of Berkeley's Public Engagement Plan proactively initiates the public involvement process and makes concerted efforts to involve members of all social, economic, and ethnic groups in the public involvement process. Aligned with the above referenced communication tactics, the City of Berkeley provides the following:

- a. Public notices published in non-English publications (if available).
- b. Title VI non-discrimination notice on agency's website.
- c. Services for Limited English Proficient persons.

2013 – 2016 Title VI Program Public Engagement Process

The City of Berkeley will conduct a Public Engagement Process for the 2017-2018 Title VI Program. This process includes Community Meetings to seek input, provide education, and highlight key components of the Title VI Plan. Materials have been created to explain Title VI policies as well as provide education on how they relate to minority populations.

The City of Berkeley will provide briefings to the Berkeley City Council.

The City of Berkeley will conduct a 30 day public comment period to provide opportunities for feedback on the 2017-2018 Title VI Program.

Comments are accepted during the public outreach period via:

- a. Email
- b. Mail
- c. Phone
- d. In person

Summary of 2017-2018 Public Outreach Efforts

Language Assistance Plan

City of Berkeley Limited English Proficiency Plan

This limited English Proficiency (LEP) Plan has been prepared to address the City of Berkeley's responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964; Federal Transit Administration Circular 4702.1B, dated October 1, 2012, which states that the level and quality of transportation service is provided without regard to race, color, or national origin.

Executive order 13166, titled "Improving Access to Services for Persons with Limited English Proficiency," indicates that differing treatment based upon a person's inability to speak, read, write or understand English is a type of national origin discrimination. It directs each federal agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discriminations do not take place. This order applies to all state and local agencies which receive federal funds.

Service Area Description:

A demographic analysis demonstrates that the LEP population, as a percentage of the total population in the City of Berkeley's service area is relatively small. In the City of Berkeley 3.5% of the population is Hispanic, 1.4% Asian, .2% American Indian, .4% Native Hawaiian & Pacific Islander, and .2% other races. This number totals to 384 people out of a total population of 8,978 people. From this 384 people less than 3% or about 11 people speak English less than well.

The City of Berkeley has developed this LEP Plan to help identify reasonable steps for providing language assistance to persons with limited English proficiency who wish to access services provided by the City of Berkeley. As defined in Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write or understand English. This plan outlines how to identify a person who may need language assistance, and the ways in which assistance may be provided.

In order to prepare this plan, the City of Berkeley will undertake the **four-factor LEP analysis** which considers the following factors:

Four Factor Analysis

1. The number and proportion of LEP persons eligible to be served or likely to be encountered in the service area:

A significant majority of people in the City of Berkeley service area are proficient in the English language. Based on 2010 Census data, [.001%] of the population five years of age and older speak English "less than very well" – a definition of limited English proficiency

LEP Population in _____ Service Area					
Population 5 years and over by language spoken at home and ability to speak English	Service Area Sector [1]	Service Area Sector [1]	Service Area Sector [1]	Service Area Total	Percentage of Population 5 Years and Older
Population 5 Years and Over					
Speak English “less than very well”					
Spanish					
Speak English “less than very well”					
Other Indo-European					
Speak English “less than very well”					
Asian and Pacific Island					
Speak English “less than very well”					
All Other					
Speak English “less than very well”					

2. Frequency of Contact by LEP Persons with the City of Berkeley's Services:

The City of Berkeley staff will review the frequency with which office staff, dispatchers and drivers have, or could have, contact with LEP persons. Staff will also determine on an average how often a request for an interpreter has been made per month.

LEP Staff Survey Form

The City of Berkeley is studying the language assistance needs of its riders so that we can better communicate with them if needed.

1. How often do you come into contact with passengers who do not speak English or have trouble understanding you when you speak English to them?
DAILY WEEKLY MONTHLY LESS THAN MONTHLY
2. What languages do these passengers speak?
3. What languages (other than English) do you understand or speak?
4. Would you be willing to serve as a translator when needed?

Frequency of Contact with LEP Persons	
Frequency	Language Spoken by LEP Persons
Daily	
Weekly	
Monthly	
Less frequently than monthly	

3. The importance of programs, activities or services provided by the City of Berkeley to LEP persons:

Outreach activities, summarized in the City of Berkeley's Title VI Public Engagement Plan, include events such as public meetings and/or open houses held at schools, churches, libraries and other non-profit locations, and include specific outreach to LEP persons to gain under-standing of the needs of the LEP population, and the manner (if at all) needs are addressed.

Outside Organization LEP Survey

Organization: _____

1. What language assistance needs are encountered?
2. What languages are spoken by persons with language assistance needs?
3. What language assistance efforts are you undertaking to assist persons with language assistance needs?
4. When necessary, can we use these services?

4. The resources available to and overall cost to provide LEP assistance:

Strategies for Engaging Individuals with Limited English Proficiency include:

1. Language line. Upon advance notice, translators can be provided.
2. Written translations of vital documents (identified via safe harbor provision)
3. One-on-one assistance through outreach efforts.
4. To the extent feasible, assign bilingual staff for community events, public hearings and on the customer service phone lines.

▼ *As applicable:* Based on our demographic analysis (Factor 1) the City of Berkeley has determined that no language group(s) within its service area meets Safe Harbor criteria requiring written translated “vital documents” by language group(s).

The City of Berkeley will provide assistance and direction to LEP persons who request assistance.

Staff LEP Training

The following training will be provided to City of Berkeley staff:

1. Information on City of Berkeley Title VI Procedures and LEP responsibilities.
2. Description of language assistance services offered to the public.
3. Documentation of language assistance requests.

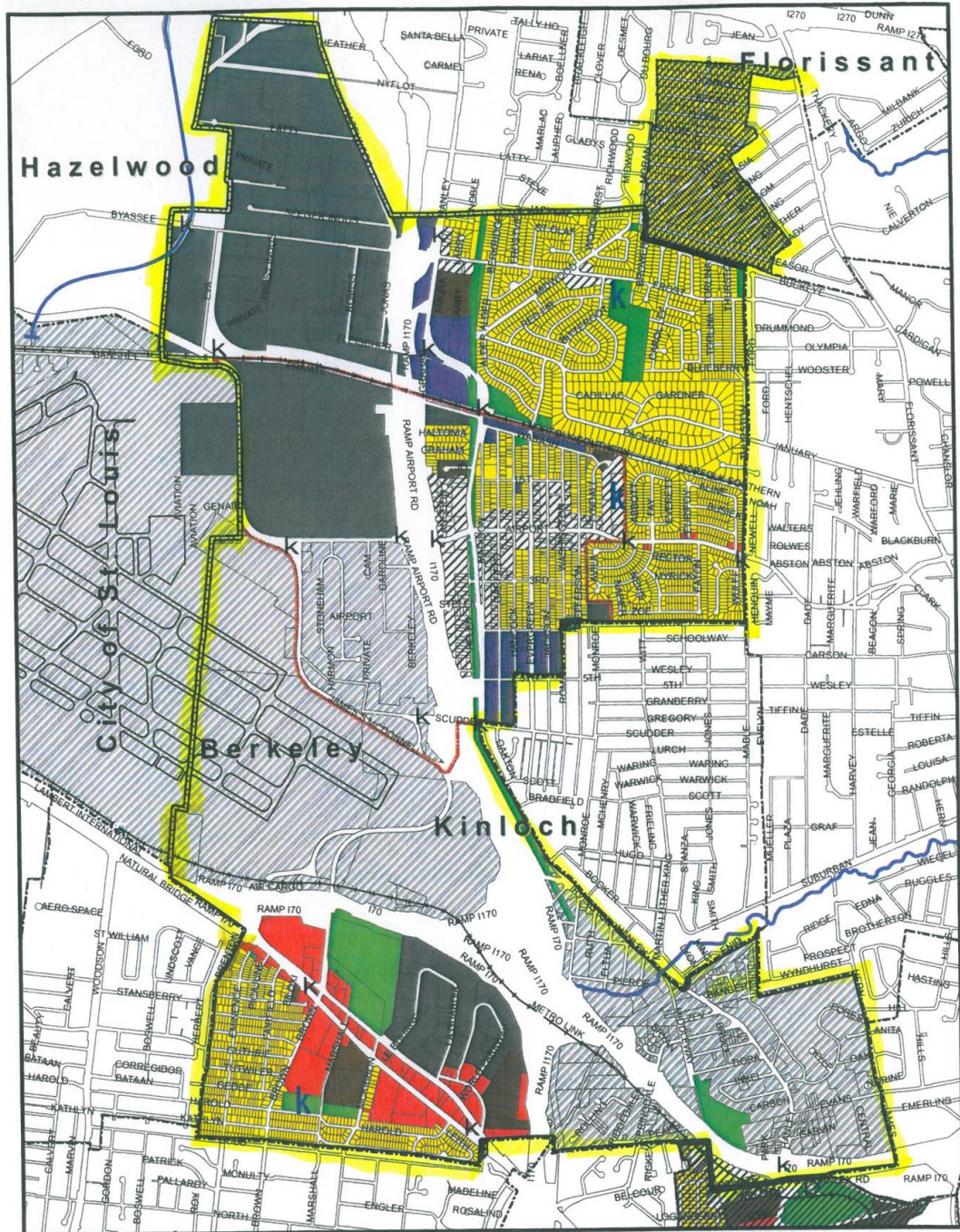
Monitoring and Updating the LEP Plan

The LEP Plan is a component of the City of Berkeley's Title VI Plan requirement.

The City of Berkeley will update the LEP plan as required. At minimum, the plan will be reviewed and updated when it is clear that higher concentrations of LEP individuals are present in the City of Berkeley service area. Updates include the following:

1. How the needs of LEP persons have been addressed.
2. Determine the current LEP population in the service area.
3. Determine as to whether the need for, and/or extent of, translation services has changed.
4. Determine whether local language assistance programs have been effective and sufficient to meet the needs.
5. Determine whether the City of Berkeley's financial resources are sufficient to fund language assistance resources as needed.
6. Determine whether the City of Berkeley has fully complied with the goals of this LEP Plan.
7. Determine whether complaints have been received concerning City of Berkeley's failure to meet the needs of LEP individual.

Agency Information (Geographic Area covered for Senior Bus Transport Services)



Attachment 2

City of Berkeley TITLE VI COMPLAINT FORM

“No person in the United States shall, on the basis 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.”

If you feel that you have been discriminated against in the provision of transportation services, please provide the following information to assist us in processing your complaint. Should you require any assistance in completing this form or need information in alternate formats, please let us know.

Please mail or return this form to:

Human Resources
City of Berkeley
8425 Airport Road
Berkeley, MO 63134
Fax number 314-264-2072

PLEASE PRINT

1. Complainant's Name:		
a. Address:		
b. City:	State:	Zip Code:
c. Telephone (include area code): Home () or Cell ()		Work
() -		() -
d. Electronic mail (e-mail) address:		
Do you prefer to be contacted by this e-mail address? () YES () NO		
2. Accessible Format of Form Needed? () YES specify: _____ () NO		
3. Are you filing this complaint on your own behalf? () YES If YES, please go to question 7. () NO If no, please go to question 4		
4. If you answered NO to question 3 above, please provide your name and address.		
a. Name of Person Filing Complaint:		
b. Address:		
c. City:	State:	Zip code:
d. Telephone (include area code): Home () or Cell ()		Work
() -		() -
e. Electronic mail (e-mail) address:		
Do you prefer to be contacted by this e-mail address? () YES () NO		
5. What is your relationship to the person for whom you are filing the complaint?		

6. Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party. () YES, I have permission. () NO, I do not have permission.		
7. I believe that the discrimination I experienced was based on (check all that apply): () Race () Color () National Origin (classes protected by Title VI) () Other (please specify)		
8. Date of Alleged Discrimination (Month, Day, Year):		
9. Where did the Alleged Discrimination take place?		
10. Explain as clearly as possible what happened and why you believe that you were discriminated against. Describe all of the persons that were involved. Include the name and contact information of the person(s) who discriminated against you (if known). <i>Use the back of this form or separate pages if additional space is required.</i>		
11. Please list any and all witnesses' names and phone numbers/contact information. <i>Use the back of this form or separate pages if additional space is required.</i>		
12. What type of corrective action would you like to see taken?		
13. Have you filed a complaint with any other Federal, State, or local agency, or with any Federal or State court? () YES If yes, check all that apply. () NO a. () Federal Agency (List agency's name) b. () Federal Court (Please provide location) c. () State Court d. () State Agency (Specify Agency) e. () County Court (Specify Court and County) f. () Local Agency (Specify Agency)		
14. If YES to question 14 above, please provide information about a contact person at the agency/court where the complaint was filed.		
Name:	Title:	
Agency:	Telephone: () -	
Address:		
City:	State:	Zip Code:

You may attach any written materials or other information that you think is relevant to your complaint.

Signature and date is required:

Signature Date

If you completed Questions 4, 5 and 6, your signature and date is required:

Signature Date

Attachment 3
Title VI Self-Survey Form

Date filed with MODOT Transit Section:

DATE

Survey Date:

Period Covered:

Name of Program/Grant:

A. Summary of Complaints:

B. Number of complaints for the period:

C. Number of complaints voluntarily resolved:

D. Number complaints currently unresolved:

E. Attach a summary of any type of complaint and provide:

- Name of complainant
- Race
- Allegation
- Findings
- Corrective Action
- Identify any policy/procedure changes made as a result of the complaint.
- Provide the date history (date complaint received through resolution)

continued

Title VI Self-Survey Form – Page 2

Distribution of Title VI Information

1. Are new employees made aware of the Title VI responsibilities pertaining to their specific duties?

YES _____ NO _____

2. Do new employees receive this information via employee orientation?

YES _____ NO _____

3. Is Title VI information provided to all employees and program applicants?

YES _____ NO _____

4. Is Title VI information prominently displayed in the organization and on relevant program materials?

YES _____ NO _____

5. Identify any improvements you have implemented since the last self-survey to support Title VI communication to employees and program applicants.

6. Identify any improvements you plan to implement before the next self-survey to support Title VI communication to employees and program applicants.

7. Identify any problems encountered with Title VI compliance, and discuss possible remedies.

Signature: _____

Title: _____

Date: _____