



**Mayor Lori M. Stone**

**TITLE VI.  
NON-DISCRIMINATION PLAN**

**One City Square  
Warren, MI 48093  
Phone: (586) 574-4500  
Fax: (586) 574-4645  
Website: [www.cityofwarren.org](http://www.cityofwarren.org)**

**Title VI Coordinator  
Human Resources Department  
One City Square, Suite 410  
Phone: 586-574-4670  
Fax: 586-574-0770**

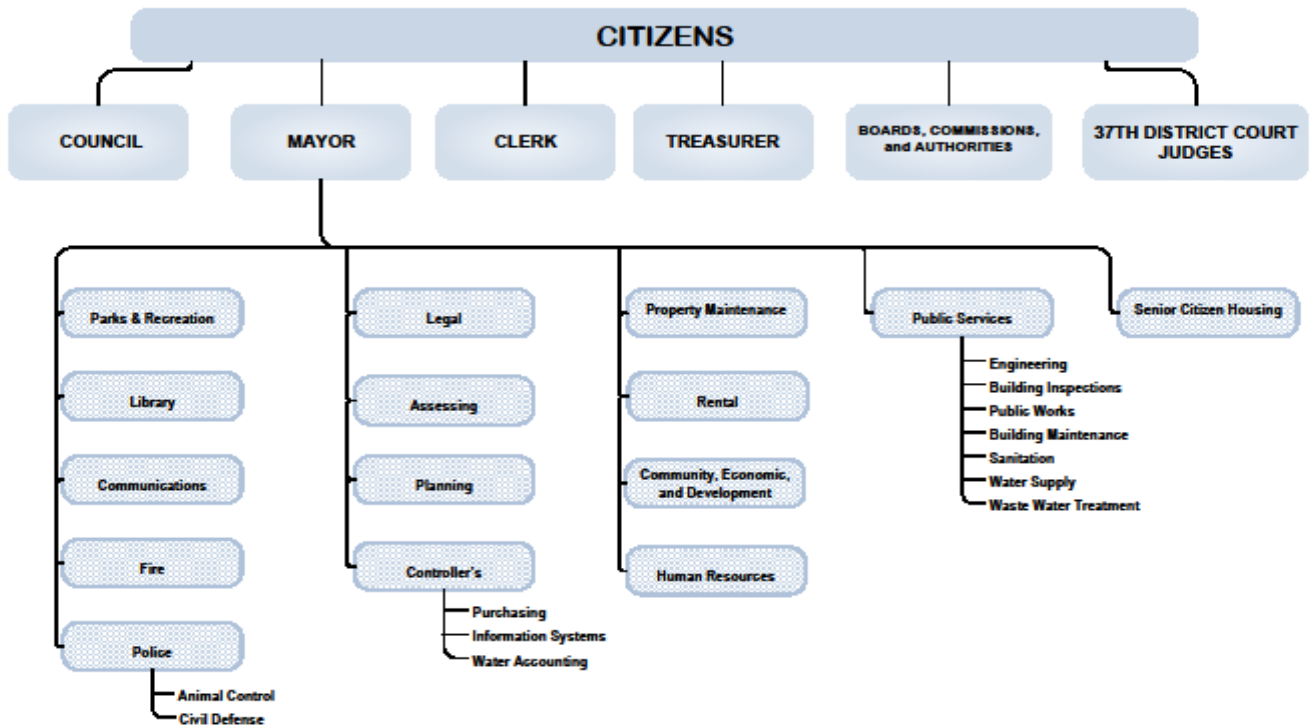


# Table of Contents

I. CITY OF WARREN ORGANIZATION CHART.....	1
II. INTRODUCTION.....	2
A. Protection from Discrimination.....	2
1. Title VI (Race, Color, and National Origin).....	2
2. Other Non-discrimination Statutes (Sex, Age, and Disability) .....	2
3. Executive Orders (Environmental Justice and Limited English Proficiency) .....	3
B. Goals and Objectives.....	3
III. DISCRIMINATION UNDER TITLE VI .....	5
A. Disparate Treatment .....	5
B. Disparate Impact .....	5
C. LEP and National Origin Discrimination.....	5
IV. CITY OF WARREN NON-DISCRIMINATION POLICY STATEMENT .....	6
V. CITY OF WARREN TITLE VI ASSURANCE.....	8
A. Authorities .....	11
B. Definitions .....	12
C. Administration - General.....	14
D. Limited English Proficiency (LEP).....	15
E. Environmental Justice (EJ).....	16
1. Achieving EJ.....	16
2. Assessing Impact on Minority or Low-Income Populations .....	16
VI. TITLE VI COMPLAINT INVESTIGATION PROCEDURE.....	18
A. Introduction .....	18
B. Purpose.....	18
C. Title VI Complaint .....	18
D. Applicability .....	18
E. Roles and Responsibilities .....	19
F. Investigation.....	19
G. Reporting Requirements to an External Agency .....	19
H. Records.....	19
<i>Appendix A — Insert for all Federal-Aid Contracts .....</i>	<i>20</i>
<i>Appendix B – Transfer of Property.....</i>	<i>22</i>
<i>Appendix C - Permits, Leases, and Licenses .....</i>	<i>23</i>
<i>Appendix D -Title VI Complaint Investigation Form .....</i>	<i>24</i>

*Appendix E – Determine/Distinguish Significant/Non-Significant Effects ..... 26*  
*Appendix F - Program Compliance/Program Review Goals for Current Plan Year ..... 27*

### I. CITY OF WARREN ORGANIZATION CHART



## II. INTRODUCTION

In 1830, the original settlement of what would become the City of Warren, Beebe's Corners, was founded at the corner of Mound and Chicago Roads. It was a carriage stop between Detroit and Utica, and included a distillery, mill, tavern, and trading post.

In 1837, Warren Township was organized around the settlement, first under the name Hickory, then renamed Ada in April 1838, and finally named Warren for War of 1812 veteran and frontier cleric, Reverend Abel Warren.

In 1957, the City of Warren (the "City") was incorporated under the home rule city act, MCL 117.1 et. seq. and included the Village of Warren and most of the surrounding Township of Warren, together with Van Dyke.

The City is located in Macomb County, Michigan. The 2020 census places the City's population at 139,387, making Warren the largest city in Macomb County, the third largest city in Michigan, and Metro Detroit's largest suburb.

### A. Protection from Discrimination

The City serves all people in the City, including minority populations, low-income populations, the elderly, persons with disabilities, and those who traverse the state of Michigan. The City recognizes its responsibility to provide fairness and equity in all of its programs, services, and activities, and that it must abide by and enforce federal and state civil rights legislation.

The *City of Warren Title VI Non-discrimination Plan* ("Title VI Plan" or "Plan") will be communicated to each City Department Head who will review the *Plan* with departmental employees. The *Title VI Plan* will be published on the main page of the City's website. See *Appendix F - Program Compliance/Program Review Goals For Current Plan Year*.

#### 1. Title VI (Race, Color, and National Origin)

*Title VI of the Civil Rights Act of 1964*, 42 U.S.C. 2000d et. seq. ("*Title VI*" or the "*Act*"), prohibits discrimination based on race, color, or national origin, in any program, service, or activity that receives federal financial assistance. Specifically, *Title VI* assures that, "No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefit of, or be otherwise subjected to discrimination under any program or activity receiving federal financial assistance."

#### 2. Other Non-discrimination Statutes (Sex, Age, and Disability)

In addition to *Title VI*, there are other non-discrimination statutes that afford legal protection. These statutes include Section 162 (a) of the *Federal Aid Highway Act of 1973*, 23 U.S.C. 324 (sex), the *Age Discrimination Act of 1975*, 42 U.S.C. 6101 et. seq. (age), and Section 504 of the *Rehabilitation Act of 1973/Americans with Disabilities Act of 1990* (disability).

The *Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970*, 42 U.S.C. 4601 et. seq. prohibits unfair and inequitable treatment of persons as a result of projects which are

undertaken with federal financial assistance; however, the *Civil Rights Restoration Act of 1987* clarified the intent of *Title VI* to include all programs and activities of federal-aid recipients and contractors whether or not those programs and activities are federally funded.

### **3. Executive Orders (Environmental Justice and Limited English Proficiency)**

In addition to statutory authorities, Executive Orders (“EOs”) provide informal non-binding guidance and technical assistance to individuals and entities that have rights or responsibilities under *Title VI*. In 1994, EO 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*, was signed, which requires federal agencies to achieve Environmental Justice (“EJ”) as part of its mission by identifying disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority and/or low-income populations. EJ Initiatives involve the potentially affected public in the development of transportation projects that fit within their communities without sacrificing safety or mobility.

In 1997, the U.S. Department of Transportation (“U.S. DOT”) summarized and expanded upon these EJ requirements when it published *Actions to Address EJ in in Minority Populations and Low-Income Populations*.

Finally, in 2000, EO 13166, *Improving Access to Services for Persons with Limited English Proficiency (LEP)*, was signed, which requires federal agencies 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.

### **B. Goals and Objectives**

As a recipient of federal financial assistance, the City will not restrict an individual in any way from the enjoyment of any advantage or privilege enjoyed by others receiving any service, financial aid, or other benefit under its programs or projects. Individuals may not be subjected to criteria or methods of administration which cause adverse impact because of their race, color, or national origin, or have the effect of defeating or substantially impairing accomplishment of the objectives of the program because of race, color or national origin. Therefore, the primary goals and objectives of the City's *Title VI Plan* are:

1. To assign roles, responsibilities, and procedures for ensuring compliance with *Title VI* and related regulations and directives.
2. To ensure that people affected by the City's programs and projects receive the services, benefits, and opportunities to which they are entitled without regard to race, color, national origin, age, sex, or disability.
3. To prevent discrimination in the City's programs and activities, whether those programs and activities are federally funded or not.
4. To establish procedures for identifying impacts in any program, service, or activity that may create an illegal adverse impact on any person because of race, color, national origin, age,

sex, or disability; or on minority populations, low-income populations, the elderly, and all interested persons, and affected *Title VI* populations.

5. To establish procedures to annually review *Title VI* compliance within specific program areas within the City.
6. To set forth procedures for filing and processing complaints by persons who believe they have been subjected to illegal discrimination under *Title VI* in a City service, program or activity.

As a sub-recipient of federal transportation funds, the City must comply with federal and state laws, and related statutes, to ensure equal access and opportunity to all persons, with respect to transportation services, facilities, activities, and programs, without regard to race, color, or national origin. Every effort will be made to prevent discrimination in any program or activity, whether those programs and activities are federally funded or not, as guaranteed by the *Civil Rights Restoration Act of 1987*. This includes protections for age, sex, disability, socio-economic status, or geographical location.

The City shall also ensure that sub-recipients adhere to state and federal law and include in all written agreements or contracts, assurances that the sub-recipient must comply with *Title VI* and other related statutes and EOs. The City, as a sub-recipient that distributes federal transportation funds, shall monitor its sub-recipients for voluntary compliance with *Title VI*. In the event that non-compliance is discovered, the City will make a good faith effort to ensure that the sub-recipient corrects any deficiencies arising out of complaints related to *Title VI*, and that sub-recipients will proactively gauge the impacts of any program or activity on minority populations and low-income populations, the elderly, persons with disabilities, all interested persons, and affected *Title VI* populations.



### III. DISCRIMINATION UNDER TITLE VI

The City has developed this *Title VI Plan* to assure that City services, programs, and activities are offered, conducted, and administered fairly, without regard to race, color, national origin, sex, age, or disability of the participants or beneficiaries of federally funded programs, services, or activities. See *City of Warren Title VI Assurance*, infra.

#### A. Disparate Treatment

There are two types of illegal discrimination prohibited under *Title VI* and its related statutes. One type, which may or may not be intentional, is *disparate treatment*. Disparate treatment is defined as treating similarly situated persons differently because of their race, color, national origin, sex, disability, or age.

#### B. Disparate Impact

The second type of illegal discrimination is *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. With disparate impact, the focus is on the consequences of a decision, policy, or practice, rather than the intent.

The City's efforts to prevent such discrimination addresses, but is not limited to, a program's impacts, access, benefits, participation, treatment, services, contracting opportunities, training, complaint investigation, allocation of funds, prioritization of projects, and the overarching functions of planning, project development and delivery, right-of-way, construction, and research.

#### C. LEP and National Origin Discrimination

The U.S. Department of Health and Human Services has published revised *Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient (LEP) Persons*.

Individuals who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English may be LEP and may be eligible to receive language assistance with respect to the particular service, benefit, or encounter.

As a recipient of federal financial assistance, the City will provide access to LEP individuals.

#### IV. CITY OF WARREN NON-DISCRIMINATION POLICY STATEMENT

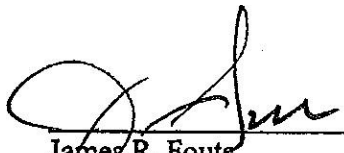
The City of Warren reaffirms its policy that no person in the United States shall, on the grounds of race, color, or national origin, age, sex, disability be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance. All individuals must have the opportunity to participate in federal financially assisted services and the City and its sub-recipients of federal funds will not:

1. Deny any individual any services, opportunity, or other benefit for which such individual is otherwise qualified;
2. Provide any individual with any service, or other benefit, which is inferior (in quantity or quality) to, or which is provided in a different manner from that which is provided to others;
3. Subject any individual to segregated or disparate treatment in any manner related to such individual's receipt of services or benefits;
4. Restrict an individual in any way from the enjoyment of services, facilities or any other advantage, privilege or other benefit provided to others;
5. Adopt or use methods of administration, which would limit participation by any group of recipients or subject any individual to discrimination;
6. Address any individual in a manner that denotes inferiority because of race, color, national origin, age, sex, or disability;
7. Permit discriminatory activity in a facility built in whole or in part with federal funds;
8. Deny any segment of the population the opportunity to participate in the operations of a planning or advisory body that is an integral part of a federally funded program;
9. Fail to provide information in a language other than English to potential or actual beneficiaries who are of limited English speaking ability, when requested and as appropriate;
10. Subject an individual to discriminatory employment practices under any federally funded program whose objective is to provide employment; or
11. Locate a facility in any way, which would limit or impede access to a federally funded service or benefit.

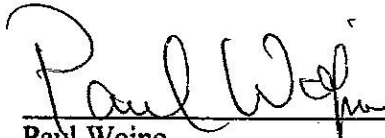
The City will require all entities that perform City services to comply with its *Title VI Plan*.

The City will actively pursue the prevention of any *Title VI* deficiencies, or violations of any related statutes, and will take the necessary steps to ensure compliance. If irregularities occur in the administration of the program's operation, procedures will be promptly implemented to resolve *Title VI* issues all within a period not to exceed 90 days.

The City designates personnel within the Human Resources Department as the City's Title VI Coordinator. The designee(s) will be responsible for initiating and monitoring *Title VI* activities and other required matters, ensuring that the City complies with the *Title VI* regulations and pursues prevention of *Title VI* deficiencies or violations. Inquiries concerning the City and *Title VI* may be directed to the Title VI Coordinator, Human Resources Department, One City Square, Suite 410, Warren, MI 48093; Phone: 586-574-4670; Fax: 586-574-0770.

  
\_\_\_\_\_  
James R. Fouts  
Mayor

7-18-13  
Date

  
\_\_\_\_\_  
Paul Wojno  
Clerk

7-17-13  
Date

  
\_\_\_\_\_  
Bill Gambill

7/18/13  
Date

## V. CITY OF WARREN TITLE VI ASSURANCE

The City of Warren ("Recipient") assures that, as a condition of receiving any federal financial assistance from the U.S. DOT it will comply with *Title VI of the Civil Rights Act of 1964*, 42 USC 2000d et. seq., Title 49 C.F.R. Part 21, *Non-discrimination in Federally-Assisted Programs for the Department of Transportation - Effectuation of Title VI of the Civil Rights Act of 1964* ("*Regulations*"), and other pertinent directives, to the end that no person in the United States shall, on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which the Recipient received federal financial assistance from the U.S. DOT, including the Federal Highway Administration, and assures that it will promptly take measures necessary to effectuate this compliance (the "*Assurance*"), as required by subsection 21.7 (a) (1) and (b) of the *Regulations*.

Authority relied upon and definitions used herein follow the signature page of this *Assurance*.

The Recipient specifically assures with respect to the Federal Aid Highway Program that:

1. The Recipient agrees that each "program" and "facility" as defined in subsections 21.23 (e) and 21.23(b) of the *Regulations*, will be conducted or operated, respectively, in compliance with the *Regulations*.
2. The Recipient shall insert the following notification in all solicitations for bids for work or material subject to the *Regulations* and made in connection with all federal did highway programs and, in adapted form in all proposals for negotiated agreements:

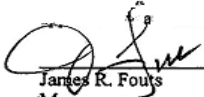
The Recipient, in accordance with *Title VI of the Civil Rights Act of 1964*, 78 Stat. 252, 42 USC 2000d to 2000d-4 and Title 49, *Code of Federal Regulations*, Department of Transportation, Sub-Title A, Office the Secretary, Part 21, *Non-discrimination in Federally Assisted Programs of the Department of Transportation* issued pursuant to such *Act*, hereby notifies all bidders that it will affirmatively insure that in any contract entered into pursuant to this advertisement, minority business enterprises will be afforded full opportunity to submit bids in response to this invitation and will not be discriminated against on the grounds of race, color, or national origin in consideration for an award.

3. The Recipient shall insert the clauses of *Appendix A* of the *Title VI Plan* in every contract subject to the *Act* and the *Regulations*.
4. The Recipient shall insert the clauses of *Appendix B* of the *Title VI Plan*, as a covenant running with the land, in any deed from the United States effecting a transfer of real property, structures, or improvements thereon, or interest therein.
5. Where the Recipient receives federal financial assistance to construct a facility, or part of a facility, the *Assurance* shall extend to the entire facility and facilities operated in connection therewith.

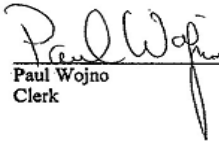
6. Where the Recipient receives federal financial assistance in the form, or for the acquisition of real property or an interest in real property, the *Assurance* shall extend to rights to space on, over or under such property.
7. The Recipient shall include the appropriate clauses set forth in *Appendix C* of the *Title VI Plan*, as a covenant running with the land, in any future deeds, leases, permits, licenses, and similar agreements entered into by the Recipient with other parties:
  - (a) For the subsequent transfer of real property acquired or improved under the Federal Aid Highway Program; and
  - (b) For the construction or use of or access to space on, over or under real property acquired, or improved under the Federal Aid Highway Program.
8. This *Assurance* obligates the Recipient for the period during which federal financial assistance is extended to the Recipient, except where the federal financial assistance is to provide, or is in the form of, personal property, or real property, or interest therein or structures or improvements thereon, in which case the *Assurance* obligates the Recipient or any transferee for the longer of the following periods:
  - (a) The period during which the property is used for a purpose for which the federal financial assistance is extended, or for another purpose involving the provision of similar services or benefits; or
  - (b) The period during which the Recipient retains ownership or possession of the property.
9. The Recipient shall provide for such methods of administration for the program as are found by the Secretary of Transportation or the official to whom it delegates specific authority to give reasonable guarantee that it, other recipients, sub-grantees, contractors, subcontractors, transferees, successors in interest, and other participants of federal financial assistance under such program will comply with all requirements imposed or pursuant to the *Act*, the *Regulations*, and this *Assurance*.
10. The Recipient agrees that the United States has a right to seek judicial enforcement with regard to any matter arising under the *Act*, the *Regulations*, and this *Assurance*.

This *Assurance* is given in consideration of and for the purpose of obtaining any and all federal grants, loans, contracts, property, discounts or other federal financial assistance extended after the date hereof to the Recipient under the Federal Aid Highway Program and is binding on it, other

recipients, sub-grantees, contractors, sub-contractors, transferees, successors in interest and other participants in the Federal Aid Highway Program. The person or persons whose signatures appear below are authorized to sign this assurance on behalf of the City.

  
\_\_\_\_\_  
James R. Fouts  
Mayor

7-18-13  
Date

  
\_\_\_\_\_  
Paul Wojno  
Clerk

7-17-13  
Date

## A. Authorities

**Title VI of the Civil Rights Act of 1964, 42 USC 2000d to 2000d-4, 42 USC 4601 to 4655; 23 USC 109(h):** *Title VI of the Civil Rights Act of 1964* provides that no person in the United States shall, on the grounds of race, color, national origin (including LEP), be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving federal financial assistance. Related statutes have expanded protections to include age, sex, disability, and income status. See 23 C.F.R. 200.9 and 49 C.F.R. 21 and other statutes and EOs listed below.

The *Civil Rights Restoration Act of 1987* also broadened the scope of *Title VI* coverage by expanding the definition of terms "programs or activities" to include all programs or activities of federal aid recipients, sub-recipients, and contractors, whether such programs and activities are federally assisted or not (Public Law 100-259 [S. 557] March 22, 1988).

**Federal Aid Highway Act of 1973, 23 USC 324:** No person shall on the ground of sex be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance under this Title or carried on under this Title.

**Age Discrimination Act of 1975, 42 USC 6101:** No person in the United States shall, on the basis of age, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under, any program or activity receiving federal financial assistance.

**Americans With Disabilities Act of 1990 PL 101-336:** No qualified individual with a disability shall, by reason of his/her disability, be excluded from participation in, be denied the benefits of, or 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:** 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.

**USDOT Order 1050.2:** *Standard Title VI Assurances.*

**EO12250:** *Department of Leadership and Coordination of Non-discrimination Laws.*

**EO 12898:** *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations.*

**CFR 50.3:** *Guidelines for the enforcement of Title VI of the Civil Rights Act of 1964.*

**EO13166:** *Improving Access to Services for Persons with Limited English Proficiency.*

## B. Definitions

**Adverse Effects** - The totality of significant individual or cumulative human health or environmental effects including interrelated social and economic effects, which may include, but are not limited to:

- Bodily impairment, infirmity, illness, or death
- Air, noise and water pollution, and soil contamination
- Destruction or disruption of man-made or natural resources
- Destruction or diminution of aesthetic values
- Destruction or disruption of community cohesion or community's economic vitality
- Destruction or disruption of the availability of public and private facilities and services
- Adverse employment effects
- Displacement of person's businesses, farms, or non-profit organizations
- Increased traffic congestion, isolation, exclusion, or separation of minority or low income individuals within a given community, or from the broader community
- Denial of, reduction in, or significant delay in the receipt of benefits of the City programs, policies and activities

See *Appendix E* for additional discussion of "significant."

**Disproportionate Effect:** Effects which are appreciably more severe for one group or predominantly borne by a single group. Whether an adverse effect is “disproportionately high” on minority and low-income populations depends on whether that effect is (1) predominantly borne by an EJ population, or (2) will be suffered by the EJ population and is appreciably more severe or greater in magnitude than the adverse effect that will be suffered by the non-EJ population. It is important to note that determinations of disproportionately high and adverse effects take into consideration the mitigation and enhancement measures that are planned for the proposed action.

**Federal Assistance** - Includes grants and loans of federal funds; the grant or donation of federal property and interests in property; the detail of federal personnel, federal property or any interest in such property without consideration or at a nominal consideration or at a consideration which is reduced for the purpose of assisting the recipient, or in recognition of the public interest to be served by such sale or lease to the recipient; and any federal agreement, arrangement or other contract which has, as one of its purposes, the provision of assistance.



**Limited English Proficiency (LEP)**- Individuals with a primary or home language other than English who must, due to limited fluency in English, communicate in that primary or home language if the individuals are to have an equal opportunity to participate effectively in or benefit from any aid, service or benefit provided by the City.

**Low-Income** - A person whose median household income is at or below the Department of Health and Human Service Poverty guidelines. See <http://aspe.hhs.gov/poverty/>.

**Low-Income Population** - Any readily identifiable group of low-income persons who live in geographic proximity and, if circumstances warrant, geographically dispersed/transient persons (such as migrant workers or Native Americans) who will be similarly affected by a proposed City program, policy or activity.

**Minority** - A person who is:

- Black - A person having origins in any of the black racial groups of Africa;
- Hispanic - A person of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture or origin, regardless of race;
- Asian American - A person having origins in any of the original people of the Far East, Southeast Asia, the Indian sub-continent, or the Pacific Islands; or
- American Indian and Alaskan Native - A person having origins in any of the original people of North America and who maintains cultural identification through tribal affiliation or community recognition.

**Minority Population** – Any readily identifiable groups of minority persons who live in geographic proximity and, if circumstances warrant, geographically dispersed/transient persons (such as immigrant workers or Native Americans) who will be similarly affected by a proposed City program, policy or activity.

**Noncompliance** - A recipient has failed to meet prescribed requirements and has shown an apparent lack of good faith effort in implementing all the requirements of *Title VI* and related statutes.

**Persons** - Where designation of persons by race, color, or national origin is required, the following designation ordinarily may be used: "White not of Hispanic origin," "Black not of Hispanic origin," "Hispanic," "Asian or Pacific Islander," or "American Indian or Alaskan Native." Additional subcategories based on national origin of primary language spoken may be used, where appropriate, on either a national or a regional basis.

**Programs and Activities** - Includes all programs or activities of federal aid recipients, sub-recipients, and contractors/consultants, whether such programs and activities are federally assisted or not, which includes education or training, work opportunities, health welfare, rehabilitation, or other services.

**Recipient** - Any state, territory, possession, the District of Columbia, Puerto Rico, or any political subdivision, or instrumentality thereof, or any public or private agency, institution, or organization, or other entity, or any individual, in any state, territory, possession, the District of Columbia, or Puerto Rico, to whom federal assistance is extended, either directly or through another recipient, for any program. Recipient includes any successor, assignee, or transferee thereof, but does not include any ultimate beneficiary under any such program.

**Significant Adverse effects on Minority and Low-income Populations** - Adverse effect that:

- a. Is predominantly borne by a minority population and/or a low-income population, or
- b. Will be suffered by the minority population and/or low-income population and is shown to be appreciably more severe or greater in magnitude than the adverse effect that will be suffered by the non-minority population and/or non-low-income population.

**Sub-recipient** - Any agency such as a council of governments, regional planning agency, education institution, that received Federal Highway Administration funds through the State DOT and not directly from the Federal Highway Administration is a sub-recipient. Other agencies, local governments, contractors, consultants that receive these funds are all considered sub-recipients.

### C. Administration - General

The City designates personnel within the Human Resources Department as the City's Title VI Coordinator, whom shall have lead responsibility for coordinating the administration of the *Title VI Plan* and related statutes program, plan, and assurances.

**Complaint:** If an individual believes that he/she or any other program beneficiary has been the object of unequal treatment or discrimination as to the receipt of benefits and/or service, or on the grounds of race, color, or national origin (including LEP), sex, age, or disability, he/she may file a complaint with the Title VI Coordinator. The City will make every effort to resolve complaints informally at the lowest level.

**Data Collection:** Statistical data on race, color, national origin, English language ability sex, age, and disability of participants in, and beneficiaries of City programs; e.g., impacted citizens and affected communities will be gathered and maintained by the City, where required. The gathering procedures will be reviewed annually to ensure sufficiency of the data in meeting the requirements of the *Title VI Plan*.

**Program Reviews:** The Title VI Coordinator will review special emphasis programs annually based on the annual summary of *Title VI* activities, accomplishments, and challenges, to ensure effective compliance with *Title VI*. The Title VI Coordinator will coordinate efforts to ensure the equal participation in all City programs and activities. The City does not have any special emphasis programs at this time.

**Title VI Reviews on Sub-recipients:** *Title VI* compliance reviews will be conducted annually by the Title VI Coordinator. Priority for conducting reviews will be given to those recipients of federal (U.S. DOT) funds with the greatest potential of impact to those groups covered by the *Act*. The

reviews will entail examination of the recipients' adherence to all *Title VI* requirements. The status of each review will be reported in the annual update and reported to relevant U.S. DOT modes upon request.

**Annual Reporting Form:** The Title VI Coordinator will coordinate, compile, and submit this information to the Michigan Department of Transportation (“MDOT”), Civil Rights Program Unit via the Sub-recipient Annual Certification Form (MDOT form #0179) by October 5<sup>th</sup> of every year.

**Title VI Non-discrimination Plan Updates:** If updated, a copy of *Title VI Plan* will be submitted to the MDOT, Civil Rights Program Unit, as soon as the update has been completed, or as soon as practicable, and no later than 30 days if significant changes are made.

**Public Dissemination:** The City will disseminate *Title VI Plan* information to the City employees, the general public, sub-recipients, contractors, and beneficiaries. Public dissemination means including *Title VI* language in contracts and publishing the *Title VI Plan* within 90 days of approval on the main page of the City’s internet website, at [www.cityofwarren.org](http://www.cityofwarren.org).

**Remedial Action:** The City, through the Title VI Coordinator, will actively pursue the prevention of *Title VI* deficiencies and violations and will take the necessary steps to ensure compliance with all program administrative requirements. When deficiencies are found, procedures will be promptly implemented to correct the deficiencies and to put in writing the corrective action(s). The period to determine corrective action(s) and put it/them in writing to effect compliance may not exceed 90 days from the date the deficiencies are found.

#### **D. Limited English Proficiency (LEP)**

In 2000, EO 13166, *Improving Access to Services for Persons with Limited English Proficiency (LEP)*, was signed, which requires federal agencies 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*. The EO states:

Each federal agency shall prepare a plan to improve access to its federally conducted programs and activities by eligible LEP persons. Each plan shall be consistent with the standards set forth in the LEP Guidance, and shall include the steps the agency will take to ensure that eligible LEP persons can meaningfully access the agency’s programs and activities.

See [www.justice.gov/sites/default/files/crt/legacy/2010/12/14/eolep.pdf](http://www.justice.gov/sites/default/files/crt/legacy/2010/12/14/eolep.pdf).

The City receives funds from the U.S. DOT via the MDOT and Federal Highway Administration and has a plan to improve access to its federally conducted programs and activities for LEP persons (“*LEP Plan*”). The *LEP Plan* may be found on the City’s internet website, [www.cityofwarren.org](http://www.cityofwarren.org). A copy of the *LEP Plan* may be requested from:

City of Warren Title VI Coordinator  
Human Resources Department  
One City Square - Suite 410

Phone: 586-574-4670

Fax: 586-574-0770

## **E. Environmental Justice (EJ)**

In 1994, EO 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*, was signed, which requires federal agencies to achieve EJ as part of its mission by identifying disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority and/or low-income populations.

EJ Initiatives are accomplished by involving the potentially affected public in the development of transportation projects that fit within their communities without sacrificing safety or mobility.

### **1. Achieving EJ**

The City seeks to achieve EJ in its programs, policies, and activities (“Projects”) by:

- Using U.S. Census data during the planning stage of a Project to identify minority and/or low-income populations that may be affected by the same;
- Following mitigation procedures, if a disproportionate effect is anticipated; and
- If mitigation options do not sufficiently eliminate the disproportionate effect, discussing and, if necessary, implementing reasonable alternatives.

Where a Project impacts a small number/area of a minority and/or low-income population, the City will document:

- What other alternatives were evaluated and eliminated because the alternatives impacted a far greater number of people or did greater harm to the environment;
- How the impact of Project is unavoidable;
- How the benefits of the Project far out-weigh the adverse impacts; and
- The mitigation measures taken to reduce the harm to low income or minority populations.

If it is concluded that no minority and/or low-income population groups are present in the Project area, the City will document how the conclusion was reached. If it is determined that one or more of these population groups are present in the area, the City will administer potential disproportionate effects test.

### **2. Assessing Impact on Minority or Low-Income Populations**

To assess Project impact on minority and/or low-income populations, the City will follow and document the following steps in an *EJ Initiative Report*:

**STEP ONE:** Determine if a minority and/or low-income population is present within the project area. If no minority or low-income population exists, document how the conclusion was reached. If there are minority or low-income populations present, proceed to Step Two.

**STEP TWO:** Determine whether the Project impact on minority and/or low income populations is disproportionately high and adverse. Refer to the list of potential impacts and questions contained in *Appendix E*. If it is determined that there are disproportionately high and adverse impacts on minority and/or low-income populations, proceed to Step Three

**STEP THREE:** Propose measures that will avoid, minimize, and/or mitigate disproportionately high and adverse impact and provide benefits and opportunities to offset and enhance communities, neighborhoods, and individuals affected by proposed Project.

**STEP FOUR:** If a high and disproportionate adverse impact to minority and/or low income populations exists after implementing the measures in Step Three, consider the following questions and document the City's response:

Question 1: Are there further mitigation measures that could be employed to avoid or reduce the adverse effect on the minority and/or low-income population?

Question 2: Are there other additional alternatives to the proposed action that would avoid or reduce the impact to the low income and/or minority populations?

Question 3: Is there a substantial need for the Project, considering overall public interest?

Question 4: Will the alternatives that would satisfy the need for the Project and have less impact on protected populations (a) have other social economic or environmental impacts that are more severe than those of the proposed Project or (b) have increased costs of extraordinary magnitude?

**STEP FIVE:** Include all findings, determinations, or demonstrations in the *EJ Initiative Report*.

## VI. TITLE VI COMPLAINT INVESTIGATION PROCEDURE

### A. Introduction

Where an allegation of violation of the *Title VI Plan* arises, or an allegation of retaliation or intimidation associated with the reporting of a violation of the *Title VI Plan* arises, the Title VI Complaint Investigation Procedure (“*Title VI Complaint Investigation*”) provides an opportunity for an individual to report the complaint, for the City to investigate the complaint, and for the City to take appropriate disciplinary action, up to and including termination, based on the findings.

### B. Purpose

The purpose of the *Title VI Complaint Investigation* is to detail the steps an individual may take to raise a complaint of discrimination regarding City programs, policies, projects, activities, or services, or to raise a complaint of retaliation or intimidation associated with the reporting of a violation of the *Title VI Plan*, so that the City may fully investigate and determine appropriate action.

### C. Title VI Complaint

A complaint of discrimination or retaliation or intimidation (the “*Title VI Complaint*”) shall be made to Title VI Coordinator. In all situations, City employees shall immediately notify the Title VI Coordinator of any complaint of discrimination or of any discrimination witnessed in the workplace. See *Appendix D – Title VI Complaint Investigation Form*.

If the complainant has presented a written statement, it must be signed. If the complainant has not prepared a written complaint, the Designated Investigator shall prepare a statement based on the interview for the complainant to sign.

*Title VI Complaints* must be filed within 180 days of the alleged discrimination. If the complainant could not reasonably be expected to know that the act was discriminatory within the 180 day period, he/she will have 60 additional days after becoming aware of the illegal discrimination to file the *Title VI Complaint*.

### D. Applicability

The *Title VI Complaint Investigation* is available to any person who believes that he/she has been excluded from participation in, or denied benefits or services of any program or activity administered by the City or its sub-recipients, consultants, and contractors on the basis of race, color, national origin, LEP, sex, age, or disability, and to any person who believes that he/she has been intimidated or retaliated against for participating in a *Title VI Complaint Investigation*.

The *Title VI Complaint Investigation* applies to the beneficiaries of City programs, policies, projects, activities or services, including but not limited to: the public, contractors, sub-contractors, consultants, and other sub-recipients of federal and state funds.

## **E. Roles and Responsibilities**

The Title VI Coordinator shall implement and oversee the *Title VI Complaint Investigation*, and may designate a capable person to investigate the complaint (“Designated Investigator”).

## **F. Investigation**

### ***TIME IS OF THE ESSENCE IN STARTING AND COMPLETING THE INVESTIGATION.***

The Designated Investigator will conduct a confidential, swift, thorough, and impartial investigation, beginning with an interview of the complaining witness to determine the exact nature and factual circumstances of the allegation, the person(s) accused, and whether there are any witnesses or documentary evidence.

Next, the Designated Investigator shall interview any identified witnesses. All witness interviews shall be summarized in writing by the Designated Investigator and signed by the witness.

After the investigation is complete, the Designated Investigator shall prepare a written report (“*Title VI Investigation Report*”), which shall state:

- The date of the complaint and the alleged discriminatory practice;
- The name of the complainant, the recipient of discrimination, the accused, and any witness;
- A concise statement of the allegation, facts and findings; and
- A conclusion as to whether the allegation is substantiated or not substantiated.

The Designated Investigator shall date and sign the *Title VI Investigation Report* and provide to the Title VI Coordinator.

The Title VI Coordinator, HR Director, and a member of the legal team shall consider the findings and conclusion of the confidential *Title VI Investigation Report* and determine the action to be taken. The Title VI Coordinator shall prepare a letter regarding the decision (“*Decision Letter*”).

## **G. Reporting Requirements to an External Agency**

A copy of the *Title VI Complaint*, *Title VI Investigation Report*, and *Decision Letter* will be sent to the MDOT Civil Rights Program Unit within 60 days of receipt the *Title VI Complaint*.

## **H. Records**

All records and investigative working files generated by the *Title VI Complaint Investigation* shall be maintained in a confidential area for three years.

***Appendix A — Insert for all Federal-Aid Contracts***

During the performance of this contract, the contractor, for itself, its assignees, and successors in interest (“the contractor”) agrees as follows:

1. **Compliance with Regulations**: The contractor shall comply with Regulations relative to non-discrimination in federally-assisted programs of the Department of Transportation, Title 49, Code of Federal Regulations, Part 21, as they may be amended from time to time (“*Regulations*”), which are incorporated by reference and made a part of this contract.
2. **Nondiscrimination**: The contractor, with regard to the work performed by it during the contract, shall not discriminate on the grounds of race, color, or national origin in the selection, retention, and treatment of subcontractors, including procurements of materials in the discrimination prohibited by Section 21.5 of the *Regulations*, including employment practices when the contractor covers a program set forth in Appendix B of the *Regulations*.
3. **Solicitation for Subcontracts. Including Procurements of Materials and Equipment**: In all solicitations either by competitive bidding or negotiation made by the contractor for work to be performed under a subcontract, including procurements of materials or leases of equipment, each potential subcontractor or supplier shall be notified by the contractor of the contractor's obligations under the contract and the *Regulations* relative to nondiscrimination on the grounds of race, color, or national origin.
4. **Information and Reports**: The contractor shall provide all information and reports required by the *Regulations*, or directives issues pursuant thereto, and shall permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by the State Highway Department or the Federal Highway Administration to be pertinent to ascertain compliance with such *Regulations* or directives. Where any information required of a contractor is in the exclusive possession of another who fails or refuses to furnish it, the contractor shall certify to the State Highway Department or the Federal Highway Administration what efforts it made to obtain the information.
5. **Sanctions for Noncompliance**: In the event of the contractor's noncompliance with the non-discrimination provisions of this contract, the City shall impose such sanctions as it or the Federal Highway Administration deem appropriate, including, but not limited to:
  - a. Withholding payments under the contract until the contractor complies and/or
  - b. Cancelling, terminating, or suspending the contract, in whole or in part.
6. **Incorporation of Provisions**: The contractor shall include provisions of paragraphs (1) through (6) in every subcontract, including procurement of material and leases of equipment, unless exempt by the *Regulations*, or directives issued pursuant thereto. The contractor shall take such action with respect to any subcontract or procurement as the State Highway Department or the Federal Highway Administration may direct as a means of enforcing such provisions including sanctions for noncompliance, provided, however, that, in the event a contractor becomes involved in, or is threatened with, litigation with a subcontractor or



supplier as a result of such direction, the contractor may request the State Highway Department to enter into such litigation to protect the interests of the State, and, in addition, the contractor may request the United States to enter into such litigation to protect the interests of the United States.

### ***Appendix B – Transfer of Property***

The following clauses shall be included in any and all deeds effecting or recording the transfer of real property, structures or improvements thereon, or interest therein from the United States.

#### **(GRANTING CLAUSE)**

NOW THEREFORE, the Department of Transportation, as authorized by law, and upon the condition that the State of Michigan, will accept title to the lands and maintain the project constructed thereon, in accordance with Title 23, United States Code, the Regulations for the Administration of the Department of Transportation and, also in accordance with and in compliance with all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, Part 21, *Nondiscrimination in Federally-assisted programs of the Department of Transportation (the “Regulations”)* pertaining to and effectuating the provisions of Title VI of the Civil Rights Act of 1964, 78 Stat. 252; 42 U.S.C. 2000d to 2000d-4, does hereby remise, release, quitclaim and convey unto the State of Michigan all the right, title and interest of the Department of Transportation in and to said lands described Exhibit “A” attached hereto and made a part hereof.

#### **(HABENDUM CLAUSE)**

TO HAVE AND TO HOLD said lands and interests therein unto the State of Michigan, and its successors forever, subject, however, the covenant, conditions, restrictions and reservations herein contained as follows, which will remain in effect for the period during which the real property or structures are used for a purpose for which federal financial assistance is extended or for another purpose involving the provision of similar services or benefits and shall be binding on the State of Michigan, its successors and assigns.

The State of Michigan, in consideration of the conveyance of said lands and interests in lands, does hereby covenant and agree as a covenant running with the land for itself, its successors and assigns, that (1) no person shall on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination with regard to any facility located wholly or in part, on, over, or under such lands hereby conveyed, and\* (2) that the State of Michigan shall use the lands and interests in lands so conveyed, in compliance with all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, Part 21, *Nondiscrimination in Federally-assisted programs of the Department of Transportation – Effectuation of Title VI of the Civil Rights Act of 1964*, and as said *Regulations* may be amended, and (3) that in the event of breach of any of the above-mentioned nondiscrimination conditions, the department shall have a right to reenter said lands and facilities on said land, and the above described land and facilities shall thereon revert to and vest in and become the absolute property of the Department of Transportation and its assigns as such interest existed prior to this deed.

\*Reverter clause and related language to be used only when it is determined that such a clause is necessary in order to effectuate the purpose of Title VI of the Civil Rights Act of 1964.

### ***Appendix C - Permits, Leases, and Licenses***

The following clauses shall be included in all deeds, licenses, leases, permits, or similar instruments entered into by the Michigan Department of Transportation, pursuant to the provisions of *Assurance 7(a)*.

The grantee, licensee, lessee, permittee, etc., (as appropriate) for himself, his heirs, personal representative, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree (in the case of deeds and leases, add, "as a covenant running with the land") that in the event facilities are constructed, maintained, or otherwise operated on the said property described in this (deed, license, lease, permit, etc.) for a purpose for which a Department of Transportation program or activity is extended or for another purpose involving the provision of similar services or benefits, the (grantee, licensee, lessee, permittee, etc.) shall remain and operate such facilities and services in compliance with all other requirements imposed pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, *Office of the Secretary, Part 21, Nondiscrimination in Federally-assisted programs of the Department of Transportation - Effectuation of Title VI of the Civil Rights Act of 1964*, and as said *Regulations* may be amended.

(Include in licenses, leases, permits, etc.)\*

That in the event of breach of any of the above nondiscrimination covenants, the Michigan Department of Transportation shall have the right to terminate the license, lease, permit, etc., and to re-enter and repossess said land and the facilities thereon, and hold the same as if said license, lease, permit, etc., had never been made or issued.

(Include in deeds)\*

That in the event of breach of any of the above nondiscrimination covenants, the Michigan Department of Transportation shall have the right to re-enter lands and facilities hereon, and the above described lands and facilities shall thereupon revert to and vest in and become the absolute property of the State of Michigan Department of Transportation and its assigns.

\*Reverter clause and related language to be used only when it is determined that such a clause is necessary in order to effectuate the purpose of the Title VI of the Civil Rights Act of 1964 and the Civil Rights Restoration Act of 1987.

***Appendix D - Title VI Complaint Investigation Form***

**CITY OF WARREN  
TITLE VI COMPLAINT FORM**

Title VI of the Civil Rights Act of 1964 states that "No person in the United States shall on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefit of, or otherwise be subjected to discrimination in any program, service, or activity receiving federal assistance."

This form may be used to file a complaint with the City of Warren based on violations of Title VI of the Civil Rights Act of 1964. You are not required to use this form; a letter that provides the same information may be submitted to file your complaint. Complaints should be filed within 180 days of the alleged discrimination. If you could not reasonably be expected to know the act was discriminatory within 180-day period, you have 60 days after you became aware to file your complaint.

If you need assistance completing this form, please contact Human Resources, via phone at 586-574-4670, or by fax at 586-574-0770.

Name: \_\_\_\_\_ Date: \_\_\_\_\_

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

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

Telephone: \_\_\_\_\_ (Home) \_\_\_\_\_ (Work)

Individual(s) discriminated against, if different than above (use additional pages, if needed).

Name: \_\_\_\_\_ Date: \_\_\_\_\_

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

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

Telephone: \_\_\_\_\_ (Home) \_\_\_\_\_ (Work)

Please explain your relationship with the individual(s) indicated above: \_\_\_\_\_

Name of agency and department or program that you allege discriminated:

Agency or department name: \_\_\_\_\_

Name of individual (if known): \_\_\_\_\_

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

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

Date(s) of alleged discrimination

Date discrimination began \_\_\_\_\_ Last or most recent date \_\_\_\_\_

**ALLEGED DISCRIMINATION:**

If your complaint is in regard to discrimination in the delivery of services or discrimination that involved the treatment of you by others by the agency or department indicated above, please indicate below the basis on which you believe these discriminatory actions were taken.

- \_\_\_\_ Race                      \_\_\_\_ Income
- \_\_\_\_ Color                    \_\_\_\_ National Origin
- \_\_\_\_ Age                        \_\_\_\_ Sex
- \_\_\_\_ Disability                \_\_\_\_ Religion

Explain: Please explain as clearly as possible what happened. Provide the name(s) of witness(es) and others involved in the alleged discrimination. (Attach additional sheets, if necessary, and provide a copy of written material pertaining to your case).

Signature \_\_\_\_\_ Date \_\_\_\_\_

Please return completed form to: Human Resources, Title VI Coordinator, City of Warren, One City Square, Suite 410, Warren, MI 48093; Phone 586-574-4670; Fax 586-574-0770

Note: The City of Warren prohibits retaliation or intimidation against anyone because that individual has either taken action or participated in action to secure rights protected by policies of the City. Please inform the Human Resources Director if you feel you were intimidated or experience perceived retaliation in relation to filing this complaint.

***Appendix E – Determine/Distinguish Significant/Non-Significant Effects***

“Significant” requires considerations of both context and intensity:

- (a) *Context*. This means that the significance of an action must be analyzed in several contexts such as society as a whole (human, nation), the affected region, the affected interests, and the locality. Significance varies with the setting of the proposed action. For instance, in the case of a site-specific action, significance would usually depend upon the effects in the local area rather than in the world as a whole. Both short-and long-term effects are relevant.
- (b) *Intensity*. This refers to the severity of impact. Responsible officials must bear in mind that more than one agency may make decisions about partial aspects of a major action. The following should be considered in evaluating intensity:
  - (1) Impacts may be both beneficial and adverse. A significant effect may exist even if, on balance, the effect would be beneficial.

“Non-significant effect” means no substantial change to an environmental component and this no material bearing on the decision-making process.

Scientific, technical, institutional, the public’s value, and the local economic conditions influence the meaning of significant effect.

If an alternative would provide a beneficial effect, then the alternative would cause no significant adverse effect. If an alternative would provide an adverse effect, the effect might be significant or the effect might be non-significant.

Determination of “significant” and “non-significant” effects will be made by the Title VI Coordinator.

***Appendix F - Program Compliance/Program Review Goals for Current Plan Year***

1. The *Title VI Plan* will be communicated to each City Department Head who will review the plan with departmental employees.
2. The *Title VI Plan* will be published on the main page of the City's website.
3. *Appendix A* will be included in all City contracts as outlined in the *Title VI Plan*.
4. The language in Number 2 of the *City of Warren's Title VI Assurance* will be included in all solicitations for bids for work or material subject to the *Regulations* and in all proposals for negotiated agreements.
5. The procedure(s) for responding to LEP individuals will be implemented.
6. All City of Warren employees will be trained or made aware of the *LEP Plan* and the *Title VI Complaint Procedure*.
7. A review of City facilities will be conducted in reference to compliance with the American Disabilities Act.
8. The following data will be collected and reviewed by the Title VI Coordinator and included, where appropriate, in the annual report submitted to MDOT.
  - a. **Boards and Commissions:** The number of vacancies; how vacancies are advertised and filled; the number of applicants; the representation of minorities will be evaluated.
  - b. **Public Meetings:** The number of open meetings; how meeting dates and times are communicated to the general public and to individuals directly affected by the meeting.
  - c. **Construction Projects:** The number of construction projects and minority contractors bidding and the number selected; verification that *Title VI* language was included in bids and for each project.
  - d. **LEP Needs:** The number of requests for language assistance that were requested or required and the outcome of these requests.
  - e. **Complaints:** The number of *Title VI Complaints* and *Retaliation Complaints* received; the nature of the *Complaints*; and resolution of the *Complaints*.
  - f. **Timeliness of Services:** The number of requests for services; amount of time from request to when service was delivered; number of requests denied.
  - g. **Right of Way/Imminent Domain:** The number of such actions and diversity of individual affected.
  - h. **Program Participants:** Racial data of program participants where possible.

9. **Training programs for staff and others:** The *Title VI Plan* will be given to all City Department Heads ensuring that all aspects of *Title VI* are spread to all areas of the City that provide-services to governmental agencies and others.
10. **Procedures for identifying and addressing Title VI issues:** The *Title VI Plan* will identify and address all issues relevant to compliance with the law. The City will audit all relevant programs to ensure compliance.
11. **Detailed plans for bringing discrimination programs into compliance:** The City has not identified any discriminatory program that violates *Title VI* or any other federal law. To ensure compliance, the City will audit all its relevant programs on a yearly basis.
12. **Methods to prevent discrimination in policy, programs, and procedures:** The *Title VI Plan* will utilize training, educational, internet, and advertising approaches to ensure that its policies are widely known. The *Title VI Complaint Investigation Procedure* will also prevent discrimination.
13. **Data collection procedures and methods:** On a regular and periodic basis the City will audit and expand its data collection procedures and methods. The Title VI Coordinator will ensure that all procedures and methods are in compliance with *Title VI* and the *Title VI Plan*.
14. **Assurances against discrimination in employment:** While *Title VI* does not relate to employment discrimination, the City continues to follow the *Title VII* laws and regulations as well as the Michigan Department of Civil Rights programs and procedures.
15. **Limited English Proficiency:** The City has a separate Limited English Proficiency Plan that is advertised, audited and overseen by the Title VI Coordinator.
16. **Internal compliance and review of all programs:** The City has developed its own practice to review all of its programs to ensure compliance with *Title VI*.