

# **CITY OF WOOD RIVER**

## **Title VI Plan**

### **I. Plan Statement**

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that "no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance" (42 U.S.C. Section 2000d).

The City of Wood River is committed to ensuring that no person is excluded from participation in, or denied the benefits of any of its services on the basis of race, color, or national origin, as protected by Title VI.

This plan was developed to guide the City of Wood River in its administration and management of Title VI-related activities.

### **Title VI Coordinator Contact**

James Schneider, City Manager  
City of Wood River  
111 N. Wood River Avenue  
Wood River, IL 62095  
618-251-3100  
[jschneider@cityofwoodriver.com](mailto:jschneider@cityofwoodriver.com)

### **II. Title VI Information Dissemination**

Title VI information posters shall be prominently and publicly displayed in the Administrative Offices of the City of Wood River at 111 Wood River Avenue, Wood River, IL 62095, and the Wood River Public Library at 326 East Ferguson, Wood River, IL 62095. Additional information relating to nondiscrimination obligation can be obtained from the City of Wood River's website at [www.woodriver.org](http://www.woodriver.org).

During New Employee Orientation and subsequent employee trainings, information relative to the provisions of Title VI, and the City of Wood River's expectations to perform their duties accordingly will be reviewed and discussed. All employees shall be provided a copy of the Title VI Plan and are required to sign the Acknowledgement of Receipt (Appendix A & B).

Title VI information shall be disseminated to employees annually via the Employee Education form (see Appendix A) in payroll envelopes. This form reminds employees of the SJCTA policy statement, and of their Title VI responsibilities in their daily work and duties.

The Title VI plan will be located on the City of Wood River's website for review and will be located at the City of Wood River Administration Office, as well as at the Wood River Public Library.

### **III. Subcontracts and Vendors**

All subcontractors and vendors who receive payments from the City of Wood River where funding originates from any federal assistance are subject to the provisions of Title VI of the Civil Rights Act of 1964 as amended.

Written contracts shall contain non-discrimination language, either directly or through the bid specification package which becomes an associated component of the contract.

### **IV. Record Keeping:**

The Title VI Coordinator will maintain permanent records, which include, but are not limited to, signed acknowledgements of receipt from the employees indicating the receipt of the City of Wood River's Title VI Plan, copies of Title VI complaints or lawsuits and related documentation, and records of correspondence to and from complainants, and Title VI investigations.

### **V. Title VI Complaint**

#### **Procedures Filing a Complaint:**

Any person can file a signed, written complaint up to one hundred and eighty (180) days from the date of the alleged discrimination. The complaint should include the following information (APPENDIX C):

- Complainant's name, mailing address, and viable contact information (i.e., telephone number, e-mail address, etc.)
- How, when, where and why the complainant believes that they were discriminated against. Include the location, names and contact information of any witnesses.  
Other information that is deemed significant

The Title VI Complaint Form (Attached) may be used to submit the complaint information. The complaint may be filed in writing with the City of Wood River at the following address:

City of Wood River  
111 N. Wood River Avenue  
Wood River, IL 62095

The City of Wood River encourages all complainants to certify all mail that is sent through the U.S. Postal Service and/or ensure that all written correspondence can be tracked easily. For complaints originally submitted by facsimile, an original, signed copy of the complaint must be mailed to the Title VI Coordinator as soon as possible, but no later than 180 days from the alleged date of discrimination.

**Complaint process:**

All complaints alleging discrimination based on race, color or national origin in a service or benefit provided by the City of Wood River will be directly addressed by the City of Wood River. The City of Wood River shall also provide appropriate assistance to complainants, including those persons with disabilities, or who are limited in their ability to communicate in English. Additionally, the City of Wood River shall make every effort to address all complaints in an expeditious and thorough manner.

A letter of acknowledging receipt of complaint will be mailed within seven days (Appendix D). Please note that in responding to any requests for additional information, a complainant's failure to provide the requested information may result in the administrative closure of the complaint.

**Notification of Complaint:**

The City of Wood River will send a final written response letter (Appendix E & F) to the complainant. In the letter notifying complainant that the complaint is not substantiated, the complainant is also advised of his or her right to appeal within seven calendar days of receipt of the final written decision from City of Wood River. Every effort will be made to respond to Title VI complaints within 60 working days of receipt of such complaints, if not sooner.

Once sufficient information for investigating the complaint is received by the City of Wood River a written response will be drafted subject to review by the city's attorney. If appropriate, the Wood River city attorney may administratively close the complaint. In this case, the City of Wood River will notify the complainant of the action as soon as possible.

**Confidentiality:**

To the extent feasible, confidentiality shall be maintained during the formal and informal investigation process.

**Investigation records:**

Records will be maintained in accordance to applicable Federal guidelines, or in their absence, applicable state guidelines.

## **VI. Limited English Proficiency (LEP) Plan**

The City of Wood River promotes a positive and cooperative understanding of the importance of language access to federally conducted and federally assisted programs.

While most individuals in the United States read, write, speak and understand English, there are many individuals whose primary language is not English. Individuals who do not speak English as their primary language and who have a limited ability to read, write, speak or understand English are considered by federal law to be limited English proficient, or "LEP." This language barrier may prevent individuals from accessing services and benefits and they may be entitled to language assistance with respect to a particular type or service, benefit, or encounter.

Federal law requires that people who are LEP have meaningful access to federally conducted and federally funded programs and activities. Moreover, federal agencies are required to ensure that recipients of federal financial assistance, like the City of Wood River, provide meaningful access to their LEP constituencies.

Two federal documents provide the foundation for the development of the LEP plan: Title VI of the Civil Rights Act of 1964, and Executive Order 13166 "Improving Access to Services for Persons with Limited English Proficiency," signed in 2000. Title VI stipulates that agencies should take reasonable actions to provide language assistance. Executive Order 13166 requires agencies to examine the services provided and develop and implement a system by which LEP persons can meaningfully access those services.

A demographic analysis conducted by the East-West Gateway Council of Governments demonstrates that the LEP population, as a percentage of the total population in the EWG service area (the eight county St. Louis region), is relatively small. A little over 1 percent of the regional population speaks English *less than well* (See Table 2b). That is, about 27,000 persons in a population of over 2 million, indicate they speak English *less than well*. An examination of the population by county indicates the LEP population is most heavily concentrated in St. Louis City (2.4 percent of the City population) and St. Louis County (1.3 percent of the County population).

The City of Wood River is mindful of the LEP population in the region and the areas with a higher concentration of the population. The City of Wood River is prepared to meet any language need that arises and respond appropriately to any requests that are made for language assistance. The City of Wood River is ready to provide oral and written translation of documents if asked to do so. The City of Wood River will provide language assistance when requested. Additionally, the agency actively seeks input from the LEP population to ensure that their needs are recognized in the planning process.

## **VII. Community Outreach**

As an agency receiving federal financial assistance, we have made the following community outreach efforts:

Community Outreach is a requirement of Title Vi Recipients and sub-recipients shall seek out and consider the viewpoints of minority and low-income populations in the course of conducting public outreach. Recipients have wide latitude to determine what specific measures are most appropriate and should make this determination based on the composition of the affected population, the public involvement process, and the resources of the recipient.

- The Title VI plan will be located on the City of Wood River's website for review and will be available at the Wood River Public Library, as well as at the City of Wood River Administrative Offices.
- All City of Wood River City Council meetings are open to the public and follow the Open Meetings Act as amended.

**Appendix A**  
**Employee Annual Education Form**

**Title VI Policy**

No person shall, on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.

All employees of the City of Wood River are expected to consider, respect, and observe this policy in their daily work and duties. If a citizen approaches you with a question or complaint, direct him or her to the Title VI Coordinator, Jim Schneider, City Manager. Citizens may call the Title VI Coordinator at 618-251-3100.

In all dealings with citizens, use courtesy titles (i.e. Mr., Mrs., Ms., or Miss) to address them without regard to race, color or national origin.

**Appendix B**  
**Acknowledgement of Receipt of Title VI Plan**

I hereby acknowledge the receipt of the City of Wood River Title VI Plan. I have read the plan and am committed to ensuring that no person is excluded from participation in, or denied the benefits of services on the basis of race, color, or national origin, as protected by Title VI.

\_\_\_\_\_  
Your signature

\_\_\_\_\_  
Print your name

\_\_\_\_\_  
Date

**Appendix C**  
**Title VI Complaint Form**

Title VI of the 1964 Civil Rights Act requires that "No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance." If you feel you have been discriminated against, please provide the following information in order to assist us in processing your complaint and send it to:

Provide address here

Please print clearly:

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

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

City, State, Zip Code \_\_\_\_\_

\_\_\_\_\_

Telephone Number: \_\_\_\_\_ (home) \_\_\_\_\_ (cell)

Person discriminated against: \_\_\_\_\_

Address of person discriminated against: \_\_\_\_\_

City, State, Zip Code: \_\_\_\_\_

Please indicate why you believe the discrimination occurred:

- \_\_\_\_\_ race or color
- \_\_\_\_\_ national origin
- \_\_\_\_\_ income
- \_\_\_\_\_ other

What was the date of the alleged discrimination? \_\_\_\_\_

Where did the alleged discrimination take place? \_\_\_\_\_

Please describe the circumstances as you saw it: \_\_\_\_\_

Please list any and all witnesses' names and phone numbers:

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What type of corrective action would you like to see taken?

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Please attach any documents you have which support the allegation. Then date and sign this form and send to the Title VI Coordinator at:

James Schneider, City Manager  
City of Wood River  
111 N. Wood River Avenue  
Wood River, IL 62095  
618-251-3100  
[jschneider@cityofwoodriver.com](mailto:jschneider@cityofwoodriver.com)

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Your signature

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Print your name

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Date

**APPENDIX D**  
**Sample Letter Acknowledging Receipt of Complaint**

Today's Date

Ms. Jo Doe  
1234 Main St.  
Clarksville, Tennessee 37040

Dear Ms. Doe:

This letter is to acknowledge receipt of your complaint against the City of Wood River alleging \_\_\_\_\_ .

An investigation will begin shortly. If you have additional information you wish to convey or questions concerning this matter, please feel free to contact this office by telephoning 618-251-3100, or write to me at this address.

City of Wood River  
111 N. Wood River Avenue  
Wood River, IL 62095  
618-251-3100

Sincerely,

James Schneider, City Manager  
Title VI Coordinator

**APPENDIX E**  
**Sample Letter Notifying Complainant**  
**that the Complaint Is Substantiated**

Today's Date

Ms. Jo Doe  
1234 Main St.  
Clarksville, Tennessee 37040

Dear Ms. Doe:

The matter referenced in your letter of \_\_\_\_\_(date) against the City of Wood River alleging Title VI violation has been investigated.

(An/Several) apparent violation(s) of Title VI of the Civil Rights Act of 1964, including those mentioned in your letter (was/were) identified. Efforts are underway to correct these deficiencies.

Thank you for calling this important matter to our attention. You were extremely helpful during our review of the program.

Sincerely,

James Schneider, City Manager  
Title VI Coordinator

**APPENDIX F**  
**Sample Letter Notifying Complainant**  
**that the Complaint Is Not Substantiated**

Today's Date

Ms. Jo Doe 1234  
Main St.  
Clarksville, Tennessee 37040

Dear Ms. Doe:

The matter referenced in your complaint of \_\_\_\_\_(date) against the City of Wood River, alleging \_\_\_\_\_ has been investigated.

The results of the investigation did not indicate that the provisions of Title VI of the Civil Rights Act of 1964 had in fact been violated. As you know, Title VI prohibits discrimination based on race, color, or national origin in any program receiving federal financial assistance.

The City of Wood River has analyzed the materials and facts pertaining to your case for evidence of the city's failure to comply with any of the civil rights laws. There was no evidence found that any of these laws have been violated.

I therefore advise you that your complaint has not been substantiated, and that I am closing this matter in our files.

You have the right to file a complaint in court and/or file a complaint with the Illinois Department of Human Rights.

For appropriate agency for ADA complaints go to <http://www.ada.gov/cguide.pdf> or call the ADA information line at 800 - 514 - 0301 (voice) or 800 - 514 - 0383 (TTY).

Thank you for taking the time to contact us. If I can be of assistance to you in the future, do not hesitate to call me.

Sincerely,

James Schneider, City Manager  
Title VI Coordinator

## **APPENDIX G**

### **Samples of Narrative to be included in Posters to be Displayed in Revenue Vehicles and Facilities**

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The City of Wood River is committed to ensuring that no person is excluded from participation in, or denied the benefits of its services on the basis of race, color, or national origin, as protected by Title VI. If you feel you are being denied services provided by The City of Wood River, or otherwise being discriminated against because of your race, color, national origin, gender, age, or disability, our contact information is:

James Schneider, City Manager  
City of Wood River  
111 N. Wood River Avenue  
Wood River, IL 62095  
618-251-3100  
[jschneider@cityofwoodriver.com](mailto:jschneider@cityofwoodriver.com)