

CITY OF LOVELAND

TITLE VI

IMPLEMENTATION

PLAN



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Prepared by:
Choice One Engineering, Loveland, Ohio
www.choiceoneengineering.com



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Title VI Implementation Plan

I. INTRODUCTION

This Title VI Implementation Plan is a part of the City of Loveland's continuing efforts to proactively meet minimum compliance requirements established under Title VI of the Civil Rights Act of 1964 (Title VI), 49 CFR § 26, and other related anti-discrimination statutes and regulations.

2. TITLE VI COMPLIANCE POLICY

The City of Loveland operates its programs and provides services without regard to race, color, national origin, sex, age, disability, or low-income status in accordance with Title VI of the Civil Rights Act of 1964 and its related statutes. Title VI of the Civil Rights Act of 1964 (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" See 42 USC § 2000(d).

In addition to Title VI, there are laws that prohibit discrimination on other grounds. Those laws include: Section 162(a) of the Federal-Aid Highway Act of 1973 (23 USC 324), which prohibits discrimination based on sex; Section 504 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act of 1990, which provide protections for disabled persons; and, the Age Discrimination Act of 1975, which applies to age.

The City of Loveland values each individual's civil rights and wishes to provide equal opportunity and equitable service for the citizens. As a recipient of federal funds, the City of Loveland conforms to Title VI and all related statutes, regulations, and directives.

Any person who believes they have been aggrieved by any unlawful discriminatory practice by the City of Loveland under Title VI may file a signed, written complaint with the City of Loveland's Title VI Coordinator. All complaints must be filed in writing no later than 180 days after the date of the last instance of the alleged discrimination. All complaints must be signed by the complainant and include the name of the individual or department alleged to have engaged in the discriminatory conduct as well as the dates, and an explanation of the facts giving rise to the claims.

For purposes of this Plan, the following individual has been identified as the City of Loveland's Title VI Coordinator:

Assistant City Manager
City of Loveland
120 W. Loveland Avenue
Loveland, OH 45140
(513) 683-0150

The City of Loveland affirms its commitment to nondiscrimination by publishing its Title VI Implementation Plan on the City's website, which may be accessed at the following link:

<http://www.lovelandoh.gov>



3. TITLE VI ASSURANCES & IMPLEMENTATION

This Title VI Implementation Plan has been adopted, implemented and is being adhered to by the City of Loveland. The City of Loveland has implemented this plan by Resolution No. 2023- _____, adopted on _____, 2023.

Signed by: _____ Date: _____
City Manager



4. OVERVIEW OF THE CITY OF LOVELAND'S TITLE VI PROGRAM

A. Complaint of Discrimination: Complaint Policy

1. How to File A Complaint

To initiate a Title VI complaint with the City of Loveland, a signed, original copy of the complaint must be mailed to the Title VI Coordinator to officially begin the complaint process. Any person with a disability may request to file his or her complaint using an alternative format. A Complainant shall utilize the City of Loveland Title VI complaint form when submitting his or her complaint.

All complaints shall be directed via regular mail to:

City of Loveland Title VI Coordinator
120 W. Loveland Avenue
Loveland, OH 45140
(513) 683-0150

A person may also file a complaint directly with the Federal Highway Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, 1200 New Jersey Avenue, SE, Washington, DC 20590 or with the Federal Transit Administration (for transit-related issues), Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Avenue, SE, Washington, DC 20590 or with the Ohio Department of Transportation, Office of Equal Opportunity, Attention: Aisha Powell, Title VI Program Manager, 1980 W. Broad Street, 2nd Floor, Mail Stop: 3270, Columbus, OH 43223.

2. Elements of a Complete Complaint

A complaint shall be filed utilizing the City of Loveland Title VI complaint form and shall be written and signed by the Complainant in order to be considered complete. Verbal complaints will not be accepted. The City of Loveland Title VI complaint form is available for pick up at the City of Loveland City Building at:

City of Loveland
City Hall
120 W. Loveland Avenue
Loveland, OH 45140

To be considered complete, a complaint must include the following information:

- The full name and address of the Complainant.
- The full name and address of the Respondent, the individual, agency, department, or program that allegedly discriminated against Complainant.
- A description of the alleged discriminatory act(s) that violated Title VI (i.e., an act of intentional discrimination or one that has the effect of discriminating on the basis of race, color, national origin, sex, age, or disability) and the date of occurrence.



3. Processing Complaints

The Title VI Coordinator will process all complaints. The Title VI Coordinator is responsible for and will proceed as follows.

- The Title VI Coordinator will review the complaint upon receipt to ensure that all required information is provided and that the complaint meets the filing deadline date, which is not more than 180 days from the date the alleged discriminatory act occurred.
- The Title VI Coordinator shall verify that the alleged discriminatory activity is attributable to, and subject to the jurisdiction of the City.
- The Title VI Coordinator will then investigate the complaint, and shall further forward the complaint to the City Solicitor, City Manager, and Human Resources Manager for concurrent review and investigation. If the complaint is filed against the City's Title VI Coordinator, the City Solicitor shall forward the complaint to the City Manager and Human Resources Manager for concurrent review and investigation.
- The Title VI Coordinator, in conjunction with the City Solicitor, City Manager, and/or Human Resources Manager, may conduct interviews or other fact-finding investigations to determine the veracity of the complaint, and to ascertain specific information relative to the alleged discriminatory practice or activity.
- Upon concluding the investigation of the complaint, the Title VI Coordinator shall notify the Complainant in writing regarding the disposition of the complaint, as well as any specific actions taken by the City responsive thereto. The determination of the Title VI Coordinator shall be final, and not subject to appeal.

If the Complainant is not satisfied with the results of the City's investigation of the alleged discriminatory practice(s), the Complainant may elect to file a complaint directly with the Federal Highway Administration, the Federal Transit Administration (for transit-related issues), or with the Ohio Department of Transportation as detailed in Section (A)(1) herein.

B. Environmental Justice

The City of Loveland is committed to ensuring that all programs or activities receiving Federal financial assistance that affect human health or the environment do not directly, or through other arrangements, use criteria, methods, or practices that discriminate on the basis of race, color, or national origin.

The three fundamental environmental justice (EJ) principles are:

- To avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority populations and low-income populations;
- To ensure the full and fair participation by all potentially affected communities in the transportation decision-making process; and



- To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority populations and low-income populations.

The City of Loveland is committed to these three environmental justice principles in all work that the City performs.

C. Limited English Proficiency (LEP)

On August 11, 2000, the President signed an executive order, Executive Order 13166: Improving Access to Service for Persons with Limited English Proficiency (LEP), to clarify Title VI of the Civil Rights Act of 1964. Its purpose is to ensure meaningful access to programs and services to otherwise eligible persons who are not proficient in the English language.

To accommodate these individuals, the City of Loveland provides, upon request, services to assist the LEP population. These services are available as coordinated by the Loveland Police Department and Mayor's Court through the following resources:

- Michael Wright, Bilingual Spanish Speaking Police Officer
 - (513) 774-3097
 - mwright@lovelandoh.gov
- Affordable Language Services
 - 9852 Redhill Drive, Cincinnati, OH 45242
 - (513) 745-0888
- Health Source of Ohio Outreach & Enrollment
 - 424 Wards Corner Road Suite 200 Loveland, OH 45140
 - (513) 707-9901

D. Non-Discrimination & Accessibility Training

At the time of hire, the City's Title VI policy will be provided to all City of Loveland employees. Employees will be provided with updated education and literature as the City of Loveland deems necessary.

E. Public Involvement

1. Data Collection

The City of Loveland shall track Title VI complaints and shall retain those complaints and any investigatory files pursuant to the adopted Records Retention Policy for the City of Loveland, Ohio.

2. Community Involvement & Outreach

The City of Loveland is committed to ensuring that community involvement and outreach is done in a respectful and appropriate manner that will allow for diverse involvement. Public meetings, programs and activities provide equitable opportunities for participation.

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The City of Loveland hosts meetings twice a month and those meetings are open to the public. Any meetings that are open to the public are published on the City of Loveland website. All City of Loveland public meetings are held in locations accessible to individuals with disabilities.

Also published on the City of Loveland's website are various meeting agendas, meeting minutes, notices, events, and news. Some departments within the City of Loveland utilize signage, media, and social media websites as another avenue to communicate with the community.



APPENDIX

- A. Compliance Policy
- B. Complaint Log
- C. External Complaint Procedure/Form



APPENDIX A: COMPLIANCE POLICY

The City of Loveland, Ohio operates its programs and provides services without regard to race, color, national origin, sex, age, disability, or low-income status in accordance with Title VI of the Civil Rights Act of 1964 and its related statutes.

Title VI of the Civil Rights Act of 1964 (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" See 42 USC § 2000(d). In addition to Title VI, there are laws that prohibit discrimination on other grounds. Those laws include: Section 162(a) of the Federal-Aid Highway Act of 1973 (23 USC 324), which prohibits discrimination based on sex; Section 504 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act of 1990, which provide protections for disabled persons; and, the Age Discrimination Act of 1975, which applies to age.

Any person who believes they have been aggrieved by any unlawful discriminatory practice by the City of Loveland under Title VI may file a complaint with the City's Title VI Coordinator. For more information on the City's civil rights protections and the procedures to file a complaint, contact the City's Title VI Coordinator. For purposes of this Plan, the following individual has been identified as the City of Loveland's Title VI and ADA Coordinator:

Assistant City Manager
City of Loveland
120 W. Loveland Avenue
Loveland, OH 45140
(513) 683-0150

All complaints must be filed in writing no later than 180 days after the date of the last instance of the alleged discrimination. All complaints must be signed by the complainant and include the name of the individual or department alleged to have engaged in the discriminatory conduct as well as the dates, and an explanation of the facts giving rise to the claims. To be considered complete, a signed copy of the complaint must be mailed to the Title VI Coordinator and postmarked no later than 180 days after the date of the last instance of the alleged discrimination.

A person may also file a complaint directly with the Federal Highway Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, 1200 New Jersey Avenue, SE, Washington, DC 20590 or with the Federal Transit Administration (for transit-related issues), Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Avenue, SE, Washington, DC 20590 or with the Ohio Department of Transportation, Office of Equal Opportunity, Attention: Aisha Powell, Title VI Program Manager, 1980 W. Broad Street, 2nd Floor, Mail Stop: 3270, Columbus, OH 43223.



APPENDIX B: TITLE VI COMPLAINT LOG

Case No.	Investigator	Complainant	Sub-recipient	Protected Category	Date Filed	Date of Final Report	Deposition



APPENDIX C: COMPLAINT PROCEDURE

INSTRUCTIONS:

The purpose of this form is to help any person interested in filing a discrimination complaint with the City of Loveland. You are not required to use this form. You may write a letter with the same information, sign it, and return it to the address below. All bold items must be completed for your complaint to be investigated. Failure to provide complete information may impair the investigation of your complaint.

Title VI of the Civil Rights Act of 1964, as amended and its related statutes and regulations (Title VI) prohibit discrimination on the basis of race, color, national origin, sex, age, disability/handicap, or income status in connection with programs or activities receiving federal financial assistance for the United States Department of Transportation, Federal Highway Administration, and/or Federal Transit Administration.

Upon request, assistance will be provided if you are an individual with a disability or have limited English proficiency.

You also have the right to file a complaint with other state or federal agencies that provide federal financial assistance to the City of Loveland. Additionally, you have the right to seek private counsel.

The City of Loveland is prohibited from retaliating against any individual because he or she opposed an unlawful policy or practice, filed charges, testified, or participated in any complaint action under Title VI or other nondiscrimination authorities.

Please make a copy of your complaint form for your personal records. Do not send your original documents as they will not be returned. Mail the original complaint form along with any copies of documents or records relevant to your complaint to the address below.

Complaints of discrimination must be filed within 180 days of the date of the alleged discriminatory act. If the alleged act of discrimination occurred more than 180 days ago, please explain your delay in filing this complaint.

Your complaint cannot be processed without your signature.



TITLE VI - COMPLAINT FORM		
Name <i>(first, middle, last)</i>		
Address <i>(number and street, city, state, and ZIP code)</i>		
Home/mobile telephone number () -	Work telephone number () -	Email Address
Name of complainant		Date <i>(month, day, year)</i>

PERSON/AGENCY YOU BELIEVE DISCRIMINATED AGAINST YOU		
Name <i>(first, middle, last)</i>	Title	
Address <i>(number and street, city, state, and ZIP code)</i>		
Home/mobile telephone number () -	Work telephone number () -	Email Address
When was the last alleged discriminatory act <i>(month, day, year)</i>?		
<p>Complaints of discrimination must be filed within 180 days of the date of the alleged discriminatory act. If the alleged act of discrimination occurred more than 180 days ago, please explain your delay in filing this complaint.</p> <p>.....</p> <p>.....</p>		

<p>The alleged discrimination was based on:</p> <p> <input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> Gender <input type="checkbox"/> National Origin <input type="checkbox"/> Disability <input type="checkbox"/> Age <input type="checkbox"/> Retaliation </p>
<p>Describe the alleged act(s) of discrimination. Use additional pages if necessary.</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p>

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Provide the names of any individuals with additional information regarding your complaint:		
Name of Witness 1 (first, middle, last)		Title
Address (number and street, city, state, and ZIP code)		
Home/mobile telephone number () -	Work telephone number () -	Email Address
Include a brief description of the relevant information the witness may provide to support your complaint of discrimination.		

Name of Witness 2 (first, middle, last)		Title
Address (number and street, city, state, and ZIP code)		
Home/mobile telephone number () -	Work telephone number () -	Email Address
Include a brief description of the relevant information the witness may provide to support your complaint of discrimination.		

Name of Witness 2 (first, middle, last)		Title
Address (number and street, city, state, and ZIP code)		
Home/mobile telephone number () -	Work telephone number () -	Email Address
Include a brief description of the relevant information the witness may provide to support your complaint of discrimination.		

How would you like your complaint to be resolved?

Have you filed a complaint alleging the same discrimination with another state or federal agency? <input type="checkbox"/> Yes <input type="checkbox"/> No	
If yes, please provide the following information for each agency:	
Name of Agency 1	Date complaint filed (month, day, year)
Case number assigned to your complaint	Current status of your complaint

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Name of Agency 2	Date complaint filed (month, day, year)
Case number assigned to your complaint	Current status of your complaint

Name of Agency 3	Date complaint filed (month, day, year)
Case number assigned to your complaint	Current status of your complaint

How did you learn about your right to file a discrimination with the City of Loveland?

Signature	Date signed (month, day, year)
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