

Title VI Compliance Plan

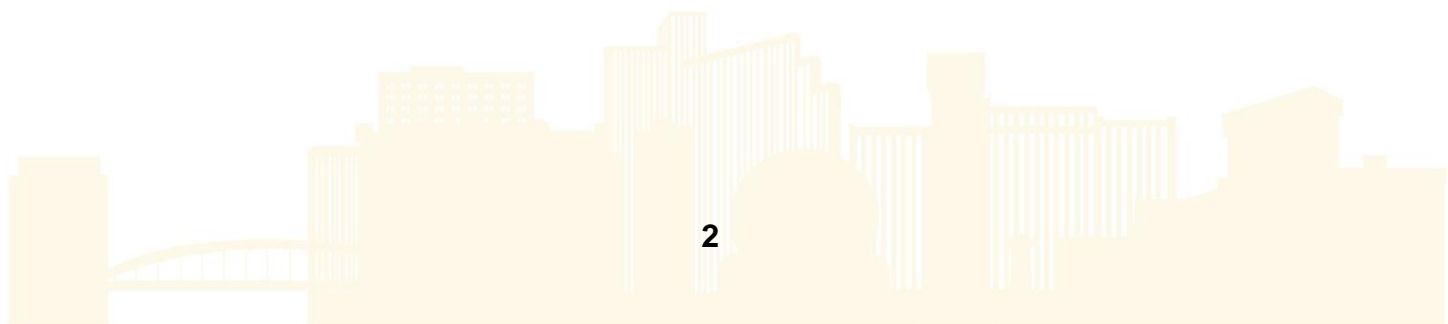
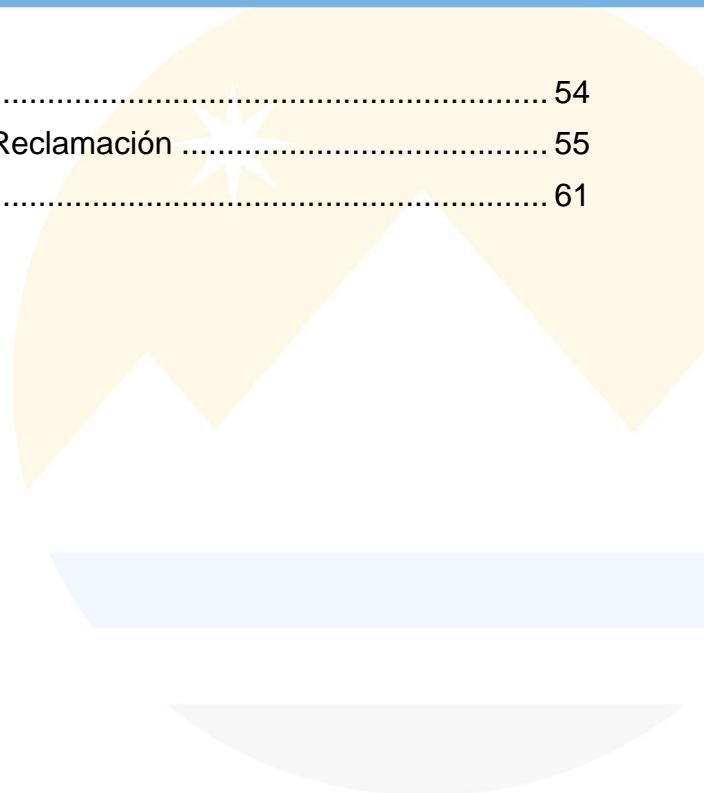
City of Reno



Table Of Contents

Introduction.....	3
1. Executive Summary.....	4
2. General Reporting Requirements	6
A. Certification and Assurances	7
B. Title VI Program Plan	8
I. Policy Statement	9
II. Organization & Staffing.....	11
III. Program Area Reviews.....	13
IV. Subrecipient Reviews.....	16
V. Data Collection.....	17
VI. Training	19
VII. Complaint Procedures.....	20
VII. Dissemination of Information.....	21
IX. Limited English Proficiency	22
X. Environmental Justice	24
XI. Public Participation	25
XII. Review of Directives.....	26
XIII. Compliance & Enforcement	27
3. Attachments.....	28
A. Assurances	29
Appendix A.....	32
Appendix B.....	34
Appendix C.....	36
Appendix D.....	37
Appendix E.....	38
B. Title VI Organizational Chart	40
C. Staff Training	41
D. Complaint Procedures – Procedimientos De Quejas.....	42
E. City of Reno Title VI Complaint Form – English/Español	46
G. Four Factor Analysis Data	52
H. Review of Directives Log	53

I. Title VI Investigations, Complaints, & Lawsuits Log	54
J. General Complaint Form – Formulario General De Reclamación	55
Definitions.....	61



Introduction

The City of Reno utilizes Federal funding programs to serve the diverse communities, and actively works to secure continued funding for the implementation of municipal services that promote the growth of its communities, excellent government services, and excel at meeting public needs.

The City of Reno is represented by an elected seven (7) member City Council that includes the City Mayor. The City Council established the vision, strategic plan, policies, and goals for the City of Reno. As the legislative body, the City Council is responsible for establishing the laws, policies, and guidelines under which the City of Reno operates, and approves how the City of Reno's funds will be expended.

The City of Reno's City Manager reports to the City Council and is primarily responsible for providing leadership and guidance to all city staff functions and operations and ensuring the vision, strategic plan, and goals of the Council are implemented and achieved. The City of Reno's City Manager performs the professional and administrative processes necessary to achieve the efficient and economic operation of the City of Reno; ensures the financial security of tax dollars by monitoring the overall fiscal activity of the City of Reno; and assists elected officials in establishing policy and long-term goals.

The City of Reno has designated a Title VI Coordinator to develop and oversee the City's Title VI plan, ensure the plan meets federal requirements, update the plan to reflect regulatory changes, monitor compliance, receive complaints, prepare, and submit required reports and assurances, and all other Title VI responsibilities as required by Title 23 Code of Federal Regulations (CFR) Part 200, Title 49 CFR Part 21, and all associated regulations and Executive Orders.

The City of Reno Title VI Coordinator reports to the City Manager on all Title VI matters and is responsible for initiating and monitoring all Title VI activities within Reno.

1. Executive Summary

Title VI of the Civil Rights Act of 1964 prohibits discrimination based on 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 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 (42 U.S.C. Section 2000d).

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 those programs and activities are Federally funded or not.

Executive Order (E.O.) 13166 placed renewed emphasis on Title VI issues, to ensure meaningful and equal access to programs and activities for persons with Limited English Proficiency (LEP).

Recipients and subrecipients of Federal funding are required to develop policies, programs, and practices that ensure Federal dollars are used in a manner that is nondiscriminatory as required under Title VI.

The City of Reno strives to ensure nondiscrimination in all activities and programs. Through a focused effort, the City of Reno has made managers, supervisors, employees, contractors, vendors, and sub-recipients of Federal-aid funds aware of and apply the intent of Title VI of the Civil Rights Act of 1964 and related statutes¹ in performing assigned duties, Jurisdiction and Authorities.

The City of Reno is a recipient of direct Federal funding and pass-through federal funding and is therefore subject to the Title VI compliance conditions associated with the use of these funds pursuant to the following:

¹ Including, but not limited to, the Federal Highway Act of 1973 (Sex), the Age Discrimination Act of 1975 (Age), the Americans with Disabilities Act of 1990 (ADA), Section 504 of the Rehabilitation Act of 1973 (Disability), Executive Order 13166, and Executive Order 12898.

NONDISCRIMINATION STATUTES

- Title VI of the Civil Rights Act of 1964 (42 USC 2000d et seq);
- Section 162 (a) of the Federal-Aid Highway Act of 1973 (23 USC 324);
- Age Discrimination Act of 1975;
- Section 504 of the Rehabilitation Act of 1973;
- Americans With Disabilities Act of 1990;
- Civil Rights Restoration Act of 1987;
- 49 CFR Part 21;
- 23 CFR Part 200;
- USDOT Order 1050.2;
- Executive Order #12898 (Environmental Justice);
- Executive Order #13166 (Limited-English-Proficiency);
- The Americans with Disabilities Act (42 USC 126)
- Title II of the Americans with Disabilities Act Implementing Regulation (28 CFR 35)
- Section 504 of the Rehabilitation Act of 1973 (29 USC 794, et seq).
- Section 504 of the Rehabilitation Act of 1973 Implementing Regulation 49 CFR 27
- Americans with Disabilities Act Accessibility Guidelines (ADAAG)
- Public Rights-of-Way (PROWAG) Notice of Proposed Rule Making, July 26, 2011
- Uniform Federal Accessibility Standards (UFAS)
- Title VII of the Civil Rights Act of 1964, as amended.
(<http://www.eeoc.gov/laws/statutes/titlevii.cfm>)
- The Age Discrimination in Employment Act of 1967, as amended
(<http://www.eeoc.gov/laws/statutes/adea.cfm>)
- The Equal Pay Act of 1963 (<http://www.eeoc.gov/laws/statutes/epa.cfm>)
- Sections 501 and 505 of the Rehabilitation Act of 1973, as amended
(<http://www.eeoc.gov/laws/statutes/rehab.cfm>)
- The Genetic Information Nondiscrimination Act of 2008
(<http://www.eeoc.gov/laws/statutes/gina.cfm>)
- The Civil Rights Act of 1991 (<http://www.eeoc.gov/laws/statutes/cra-1991.cfm>)
- Title 29, Code of Federal Regulations, Part 1614 (<http://www.eeoc.gov/federal/directives/1614-final.cfm>)
- No Fear Act (<https://www.transportation.gov/civil-rights/civil-rights-awareness-enforcement/no-fear-act>) 23 CFR 230, Subpart C

2. General Reporting Requirements

This document details how the City of Reno incorporates nondiscrimination policies and practices in providing programs and services to the public and other stakeholders. The City of Reno is a recipient of financial assistance from Federal-aid programs. Recipients and sub-recipients of Federal aid are required to comply with various nondiscrimination laws and regulations, including Title VI of the Civil Rights Act of 1964.

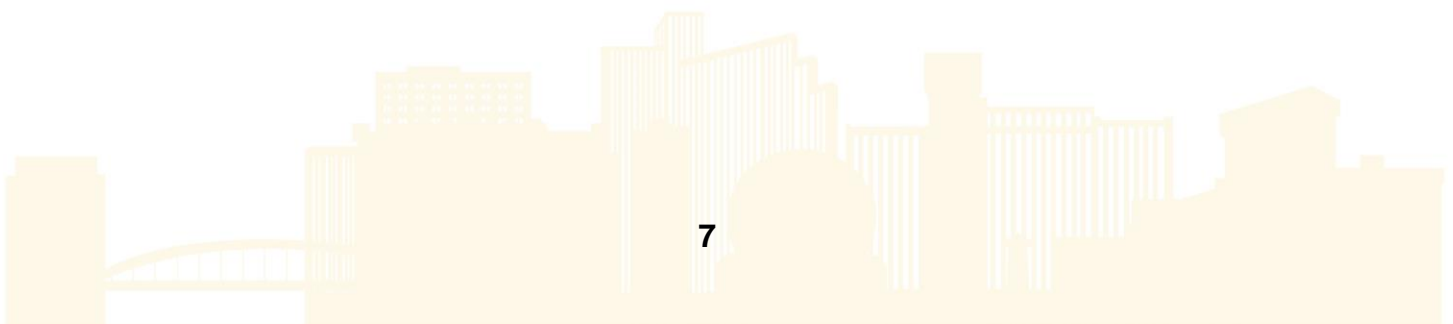
Title VI of the Civil Rights Act of 1964 forbids discrimination against anyone in the United States based on race, color, or national origin by any program receiving Federal aid. Subsequently, various other statutes, including the Federal-Aid Highway Act of 1973, added prohibitions against discrimination based on sex, age, disability, or socioeconomic status.

The Civil Rights Restoration Act of 1987 defines the word “program” to make clear that discrimination is prohibited throughout an entire agency if any part of the agency receives Federal financial assistance. The City of Reno strives to ensure nondiscrimination in all activities and programs. The City of Reno has made managers, supervisors, employees, contractors, and vendor sub-recipients of Federal-aid funds aware of and apply the intent of Title VI of the Civil Rights Act of 1964 and related statutes in performing assigned duties through mandatory training.

Federal statutes require recipients of Federal-aid programs to prepare and implement a program to clarify roles, responsibilities, and procedures established to ensure compliance with Title VI of the Civil Rights Act of 1964. The City of Reno Title VI Program Plan provides the policy direction necessary to ensure compliance with Title VI of the Civil Rights Act of 1964.

A. Certification and Assurances

The City of Reno has signed the Standard USDOT Title VI Assurances in accordance with USDOT 1050.2A (including Appendix A-E), and is attached as ATTACHMENT A.



B. Title VI Program Plan

The City of Reno has completed the required elements and documentation for the Title VI Program, and has formalized the plan, including all attachments. The City of Reno Title VI Coordinator collaborates with the directors, managers, and supervisors to ensure compliance with Title VI Nondiscrimination requirements. This partnership ensures nondiscrimination in the delivery of the City of Reno programs and activities. It is essential that a collaborative relationship be maintained between the Title VI Coordinator and the City of Reno directors, managers, and supervisors. The directors, managers, and supervisors provide organizational knowledge of their respective office disciplines, and the Title VI coordinator provides a practical application of Title VI. The Title VI program plan has been approved by the Reno City Council on [date] as described in this document.

I. Policy Statement

Title VI of the Civil Rights Act of 1964 states:

"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 subjected to discrimination under any program or activity receiving Federal financial assistance."

The City of Reno is committed to complying with the requirements of Title VI in all of its federally funded programs and activities. Additionally, the City of Reno is committed to extending nondiscrimination requirements to include associated nondiscrimination regulations including, but not limited to the Federal Highway Act of 1973 (Sex), the Age Discrimination Act of 1975 (Age), the Americans with Disabilities Act of 1990 (ADA), Section 504 of the Rehabilitation Act of 1973 (Disability), Executive Order 13166, and Executive Order 12898. For additional information about the *City of Reno* Title VI obligations, please contact (775) 334-3105 or visit our web page at www.reno.gov.

El Título VI de la Ley de Derechos Civiles de 1964 establece:

"Ninguna persona en los Estados Unidos, por motivos de raza, color u origen nacional, será excluida de la participación, se le negarán los beneficios o estará sujeta a discriminación bajo cualquier programa o actividad que reciba asistencia financiera federal".

El Departamento de Obras Públicas de la Ciudad de Reno se compromete a cumplir con los requisitos del Título VI en todos sus programas y actividades financiados con fondos federales. Además, el Departamento de Obras Públicas de la Ciudad de Reno se compromete a extender los requisitos de no discriminación para incluir las regulaciones asociadas de no discriminación, incluidas, entre otras, la Ley Federal de Carreteras de 1973 (Sexo), la Ley de Discriminación por Edad de 1975 (Edad), la Ley de Estadounidenses con Discapacidades de 1990 (ADA), la Sección 504 de la Ley de Rehabilitación de 1973 (Discapacidad), Orden Ejecutiva 13166 y Orden Ejecutiva 12898. Para obtener información adicional sobre las obligaciones del Título VI del Departamento de Obras Públicas de la Ciudad de Reno, comuníquese con (775) 334-3105 o visite nuestro sitio web en www.reno.gov.

Making a Title VI Complaint:

Any person who believes that they have been subject to unlawful discriminatory practice under Title VI may file a complaint with the City of Reno. Any such complaint must be in writing and filed with the City of Reno within 180 days following the date of the alleged discriminatory occurrence. For information on how to file a complaint, please contact:

Presentar una queja del Título VI:

Cualquier persona que crea que ha sido objeto de una práctica discriminatoria ilegal bajo el Título VI puede presentar una queja ante la *Ciudad de Reno*. Cualquier queja de este tipo debe hacerse por escrito y presentarse ante la *Ciudad de Reno* dentro de los 180 días siguientes a la fecha del presunto incidente discriminatorio. Para obtener información sobre cómo presentar una queja, comuníquese con:

Title VI Coordinator
City of Reno
1 E. First Street
Reno, NV 89501
titlevicoordinator@reno.gov

By _____
City of Reno Mayor, Hillary Schieve

Dated _____

II. Organization & Staffing

Under the authority of the City of Reno's City Manager, the City of Reno's Title VI Coordinator will be responsible for ensuring the implementation of the City of Reno's Title VI program.

The Title VI Coordinator and department assigned Title VI liaisons are responsible for coordinating the overall administration of the Title VI program, plan, and assurances, including complaint handling, data collection, and reporting, annual reviews and updates, internal training, and monitoring Title VI activities for Federally Funded Projects completed by the City of Reno.

Title VI coordinator's responsibilities include but are not limited to:

- Process the disposition of Title VI complaints received.
- Coordinating with Department Directors to assign Title VI Liaisons.
- Assisting program personnel to correct Title VI problems or discriminatory practices or policies found through self-monitoring and review activities.
- Ensuring that Title VI requirements are included in policy directives and that the procedures used have built-in safeguards to prevent discrimination.
- Direct efforts to coordinate the development and implementation of a Title VI and related statutes training program.
- Collect statistical data (race, color, or national origin) of participants in and beneficiaries of City programs, (e.g., affected citizens, and impacted communities).
- Conduct annual Title VI reviews of the City's to determine the effectiveness of program activities at all levels.
- Conduct or facilitate training programs on Title VI and other related statutes for City employees.
- Prepare a yearly report of Title VI accomplishments and goals, as required.
- Develop Title VI information for dissemination to the general public and, where appropriate, in languages other than English.
- Identify and eliminate discrimination.
- Establish procedures for promptly resolving deficiency status and writing the remedial action necessary, all within a period not to exceed 90 business days.

The Title VI Coordinator oversees the day-to-day administrative requirements of the City of Reno Title VI Program. The Title VI Coordinator also serves as the individual to whom complaints alleging discrimination are submitted and is responsible for communicating and coordinating with the City of Reno directors, managers, and supervisors on all activities subject to Title VI, E.O. 12898, and E.O. 13166, as well as coordinating staff training. The Title VI Coordinator is also responsible for working with the City of Reno Title VI liaisons to monitor procedures and practices related to the City of Reno projects and services to ensure the programs are operated and the services are provided fairly, equitably, and in a non-discriminatory manner in accordance with Title VI, E.O. 12898, and E.O. 13166. The City of Reno directors, managers, and supervisors are responsible for providing program activity information to the Title VI Coordinator on an ongoing and timely basis.

The City of Reno organizational chart shows the Title VI Coordinator has direct access to the City's highest authority on all Title VI matters, and is attached as ATTACHMENT B.

For more information on the City of Reno organization and staffing please visit: www.reno.gov.

III. Program Area Reviews

The City of Reno’s Title VI Coordinator reviews the City’s Title VI program as needed to ensure implementation of the Title VI plan in all areas of the organization and ensure nondiscrimination. In addition, they review the City’s operational guidelines and publications, including those for contractors, to verify that Title VI language and provisions are incorporated, as appropriate.

The cornerstone of Title VI and Environmental Justice (EJ) compliance in all the City of Reno programs is outreach and public involvement. The City of Reno has Neighborhood Advisory Boards that are designed to provide early, continuous, and extensive outreach to all communities, and ensures that project selection does not subject minority, low-income, disabled and elderly populations to disproportionately high and adverse impacts in any City of Reno program or activity.

Project tasks in the areas of Research, Planning, Environmental Services, Right-of-Way, and Construction, are currently administrated by the City of Reno through contracts to various contractors and service providers, following federal procurement procedures. However, should the City of Reno decide to complete tasks in these areas using City of Reno staff, the tasks would continue to be completed following federal procurement procedures as identified below.

The City of Reno uses an annual process to review Title VI activities to ensure nondiscrimination. The Title VI Coordinator examines data for nondiscrimination in the following areas:

a. Public Works

The Public Works department has an essential function and responsibility within the City of Reno to assist in meeting the overall mission, goals, and values through planning, designing, and building sustainable and resilient public infrastructure that protects and improves quality of life and complements diverse growth for the vibrant Reno community.

The City has the primary responsibility for assuring that construction practices adhere to Title VI requirements.

- Ensure project information is adequately distributed to stakeholders and the public, following the City of Reno public involvement through Neighborhood Advisory Boards and LEP plan;
- Carefully review project activities to avoid disproportionately high or adverse

- impacts on underserved communities during the construction phases;
- Regularly check all contracts and a sampling of subcontracts to ensure appropriate nondiscrimination language and required contract inclusions.

b. Environmental Services (Project Development)

The City of Reno utilizes consultants for environmental services, however if the City of Reno were to perform Environmental Services it would integrate environmental considerations into all Public Works activities to achieve environmental compliance. Consultants for the City of Reno manage environmental programs, work to streamline the environmental process, and monitor changing laws and regulations.

A contract with standard terms and conditions is submitted with all Requests for Proposals, which includes the required Title VI language. Additionally, contracts with consultants are compiled using standard templates which have standard contract language regarding Title VI as part of the General Terms and Conditions. All consultant contracts include the standard contract clauses and also include a provision that says that any subcontracts must include these same provisions.

Environmental Services are focused on preparing environmental documentation for projects and the processes for approving that document. They discuss how Title VI should be incorporated into the environmental process and environmental documentation.

All notices and project documents are placed on the City of Reno's web page. The City of Reno's social media may be used to disseminate meeting notices. All notices placed in newspapers are placed in the regular body of the paper and not the legal notices section. If a proposed project is in an identified LEP community, multi-lingual newspapers to reach the target community, and radio stations may be included in the noticing effort. Community facilities such as churches, community centers, and commercial businesses are approached to post notices of the meeting. When warranted, mailings to property owners are bilingual. As requested in advance, department liaisons will coordinate efforts for language interpreters to be available at the City of Reno public meetings. Community advisory councils or boards are made separate from the meeting, and if requested, project representatives make a separate presentation to those bodies. National Environmental Policy Act (NEPA) documents are made available at local libraries, affected city or county offices, and at the City of Reno Office. Copies of documents are available upon request and may be translated as requested.

As part of a given environmental study, identifying the minority and low-income composition of the project's study area is a specific task. Based on the result of this research, outreach methods

are established to involve potentially affected neighborhoods or potential project users most effectively. Post-meeting reviews are held to determine the effectiveness of all aspects of the meeting and to make recommendations for future meetings.

c. Planning

The City of Reno understands that building projects and road construction touch everyone's lives on a daily basis. Building projects and road construction are critical to our county's economic vitality and our quality of life, which is why the City of Reno engages in a forward-thinking planning process that encourages community and stakeholder participation in these investment decisions.

The City of Reno uses Neighborhood Advisory Boards to provide early, continuous, and extensive outreach to all communities, and ensure that project selection does not subject minority, low-income, disabled and elderly populations to disproportionately high and adverse effects.

d. Research

The public works department manages research that focuses on technical building projects and roadway issues.

e. Right-of-Way

The City of Reno utilizes consultants for Right-of-Way who have the responsibility of assuring that all ROW functions and the results of those activities are executed in accordance with Title VI. The City ensures the equitable treatment of business and persons displaced by road projects, regardless of race, color, or national origin, as outlined by Title VI by operating under the Federal Code of Regulations (49CFR Part 24), to address the requirements established by the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA), as amended.

- ROW uses interpreters and translators as necessary to ensure that those with LEP needs receive meaningful access to the *City of Reno* programs and services;
- ROW addresses the need for special accommodation for those with disabilities;
- All projects have a ROW plan that is monitored for compliance with the Uniform Act and Relocation Assistance and Real Property Acquisition Policies Act of 1970 as well as for Title VI compliance; and
- The Title VI Coordinator uses a review process to annually review ROW activities to ensure nondiscrimination.

IV. Subrecipient Reviews

The City of Reno is committed to nondiscrimination in all forms, including Title VI and all associated nondiscrimination regulations. Upon adoption of the Title VI Compliance plan the City will begin performing the required annual subrecipient reviews. In addition to completing Title VI training, the City of Reno directors, managers, and supervisors in each service area (Public Service Area Definition 4), are responsible for familiarizing themselves with the requirements of Title VI, E.O. 12898, and E.O. 13166, and for ensuring that departmental contractors, consultants, and vendors are complying with the requirements of the City of Reno Title VI Program. They are responsible to promptly report issues or complaints concerning Title VI and related statutes to the Title VI Coordinator and for assisting the Title VI Coordinator in their efforts to implement all requirements, internally and externally. They are also responsible for coordinating with the Title VI Coordinator on any proposed changes to operating procedures, instructional memoranda, policies, and manuals, etc. that relate to Title VI.

V. Data Collection

The City of Reno is guided by Federal regulations to collect statistical data on the race, color, and national origin of participants in and beneficiaries of its programs. Accordingly, the City of Reno gathers, analyzes, and maintains statistical data on race, color, national origin, sex, age, and disability of participants in and beneficiaries of the City of Reno Federal-aid programs, (e.g., relocatees, affected populations, and participants) to ensure equitable benefits and burdens to the eligible population, including minority and low-income populations.

The City of Reno will collect appropriate data during the acquisition and relocating of real property (Real Property Definition 5), process as needed and will provide an opportunity for participants at public meetings to provide associated data, as necessary. This information will be retained per the federal document retainage period guidelines and will be made available to authorized agencies during reviews.

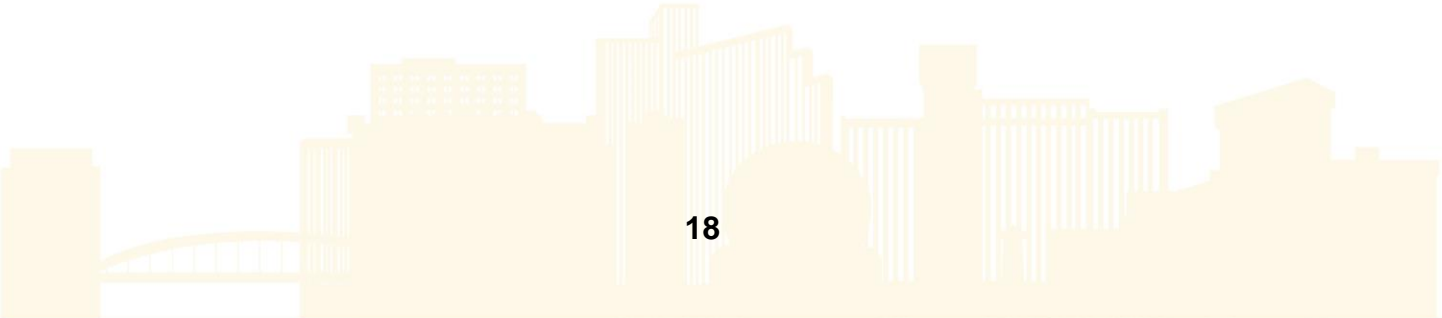
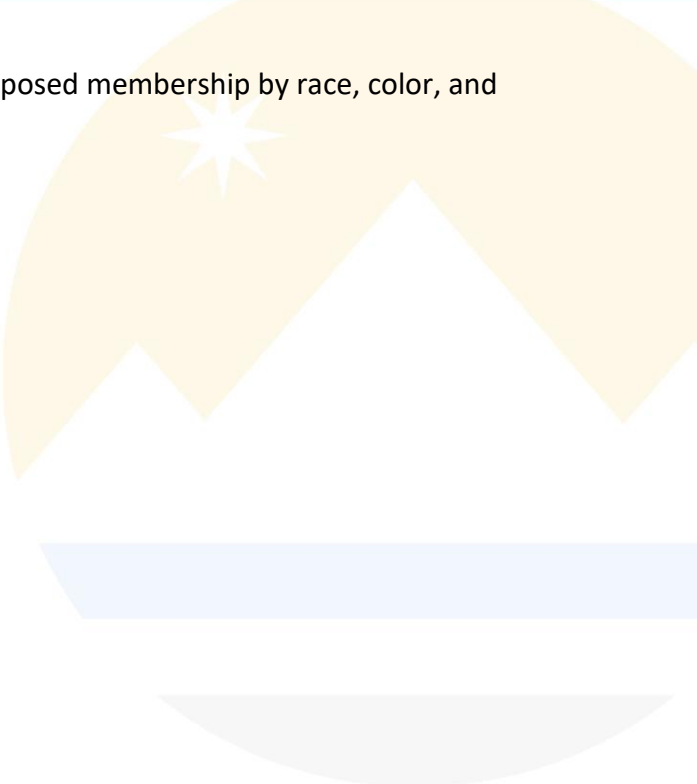
Collecting, analyzing, and maintaining statistical data are crucial elements of the Title VI Program because they constitute an effective mechanism by which to numerically verify the distribution and impact of program funding.

Each federal program area is responsible for collecting Title VI/nondiscrimination-related data and analyzing the data annually to identify and address any trends or patterns of discrimination. Data collection is key to ensuring that Federally funded programs and projects effectively meet the needs of “all persons” without discrimination (i.e., disproportionately benefiting or harming one group over another is a violation of Title VI.) Based on Title VI implementing regulations, each federal program area is required to:

- Provide for the collection of data and information to demonstrate effective enforcement of Title VI;
- Collect data about beneficiaries;
- Analyze the data and information collected;
- Identify potential discrimination and work to eliminate if found; and
- Take affirmative measures to ensure nondiscrimination.

When determining compliance with Title VI, considerations include the way services (Services of Public Works Definition 6), are or will be provided, the population eligible by race, color, and national origin, the

location of existing or proposed facilities, and the present or proposed membership by race, color, and national origin, of any planning or advisory body.



VI. Training

The City of Reno utilizes guidance and training from a Title VI training source and accompanying resources for all the City of Reno employees to have a basic understanding of the requirements of Title VI and the City of Reno's Title VI/Nondiscrimination Plan. Staff Awareness training will be held upon hire, and annually for general employees, directors, managers, and supervisors, as required. Supporting data of Title VI Staff Awareness training is attached to this document as ATTACHMENT C.

The City of Reno provides training, presentations, and resources that provide comprehensive information on the Title VI requirements, its application to specific program operations, identification of Title VI issues, and the resolution of potential or formal complaints.

Additionally, the Title VI Coordinator and liaisons meet annually (more often if warranted) to discuss practical solutions to Title VI issues, and the City of Reno Title VI/Nondiscrimination Plan.

VII. Complaint Procedures

The City of Reno is committed to ensuring its programs and activities are operated in a nondiscriminatory manner and use a discrimination complaint form which covers the Title VI requirements of race, color, and national origin.

Any person who believes that they have been discriminated against based on race, color, or national origin by the City of Reno, may file a Title VI complaint with the City of Reno by completing and submitting the Title VI Complaint Form. The Complaint Form and Complaint Procedures are available at **www.Reno.gov** or our office at City Hall and are available in English and in Spanish as outlined in SB 318 and AB 266. Complaint Procedures and Complaint Forms, in English and Spanish, are attached to this document as ATTACHMENT D & E. Additionally, a general complaint form covering other protected classes, not explicitly covered by Title VI, is attached as ATTACHMENT J.

All Title VI complaints are processed for investigation within twenty-one (21) days of receipt of a complaint.

Title VI Coordinator
City of Reno
1 E. First Street
Reno, NV 89501
(P) (775) 334-3105
(F) (775) 334-2409
titlevicoordinator@reno.gov

VII. Dissemination of Information

Information on the City of Reno Title VI program will be disseminated through the City's web page, www.reno.gov, in the lobby of any of the City of Reno buildings open to the public, such as the lobby of City Hall, to City employees, contractors, and beneficiaries, as well as to the general public in accordance with federal and state statutes/regulations. The Title VI program will be available in other languages as needed and requested.

The City of Reno provides Title VI information such as posters, brochures, or survey cards at public meetings. These program posters and brochures are available in languages other than English, as requested. Furthermore, current copies of our Title VI Notice to the Public are available and accessible at the City of Reno offices at City Hall.

In addition to language access measures, other major components of public participation include public participation design factors; a range of public participation methods to provide information, invite participation and/or seek input; examples to demonstrate how population-appropriate outreach methods can be and were identified and utilized; and performance measures and objectives to ensure accountability and a means for improving over time. Notice to the Public of their Title VI rights is attached as ATTACHMENT F.

Additional Title VI information is posted on the City of Reno website www.reno.gov.

IX. Limited English Proficiency

LEP Four Factor Analysis for the City of Reno

Factor 1: The number and proportion of LEP persons served or encountered in the eligible service population.

- From the City’s perspective, the following language was listed with the greatest number of speakers who spoke English less than “very well” in the City of Reno: **Spanish**

Factor 2: The frequency with which LEP individuals come into contact with your programs, activities, and services.

- The following program areas within the City of Reno have been identified to have interaction with the public:
 - Construction;
 - Environmental;
 - Planning;
 - Right of Way;
- These areas have the potential for ongoing frequent contact with LEP populations.

Factor 3: The importance of LEP persons in your program, activities, and services.

- Since our activities involve transportation-related outcomes, the importance of the City of Reno programs, activities, and services are of great significance to the LEP populations of the City of Reno.

Factor 4: The resources available to the recipient and costs.

- The City of Reno Title VI Notice to the Public is posted at all the City of Reno offices open to the public; the notice is printed in English and Spanish, and available in other languages as requested.
- The City of Reno utilizes a Language Identification Guide, and translation applications to help LEP individuals to access our programs, services, and activities. These resources are available as requested at public counters and employee desks or job sites. The cost for this resource is minimal.

Language Access Plan (LAP)

The City of Reno is committed to assisting people who do not speak English or do not speak English well. Individuals who do not speak English as their primary language and who have a limited ability to read, speak,

write, or understand English are considered Limited English Proficient, or LEP. These individuals may be entitled to language assistance with respect to a particular type of program, service, or activity. This section outlines the LEP protections and plans for compliance. Title VI and Executive Order 13166 prohibit recipients of federal financial assistance from discriminating based on national origin.

It is the policy of the City of Reno to take reasonable steps to provide LEP individuals with meaningful access to all programs, services, or activities. The City of Reno shall take reasonable steps to effectively inform the public of the availability of language-accessible programs, services, and activities as outlined in the City of Reno's Language Access Plan.

The City of Reno, guided by our Four Factor Analysis, has minimal contact throughout the year with LEP persons. However, the city understands the nature and importance of the program, activity, and services to people's lives and will take reasonable steps to promote participation and inclusion in our programs. The city will update, evaluate, and monitor its Language Access Plan (LAP) every two years.

All staff will be provided with the LAP plan and will be educated on policies, procedures, and services available. This training will be included in our Title VI training held annually for directors, managers, and supervisors, for our general staff awareness training, and as appropriate for new hires and promoted employees.

All vital documents related to Federally funded projects will be translated into Spanish and all other languages can be translated upon request by contacting the Title VI Coordinator.

*Si desea que estos documentos sean traducidos al español, por favor póngase en contacto con [Title VI Coordinator](#).

Following federal guidance, analysis has been completed to understand language needs and allocate resources appropriately. It is attached as ATTACHMENT G.

X. Environmental Justice

The City of Reno’s Environmental Services consultant fulfills this requirement by following the NEPA process. The City of Reno promotes public participation through ongoing outreach and event organization.

Environmental Justice (EJ) is the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. Fair treatment means (1) that all persons share in the benefits of our investments; and (2) that no person (including racial, ethnic, or low-income groups) should bear a disproportionate share of the negative consequences resulting from the execution of Federal, State, and local programs and policies. Based on the guidance of the USDOT Order on Environmental Justice as cited in “An Overview of Transportation and Environmental Justice” there are three fundamental principles of environmental justice, and they are:

- To avoid, minimize, or mitigate disproportionately high and adverse human health and environmental 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 and low-income populations.

In accordance with Executive Order 12898 on EJ and the related US DOT, FHWA Orders, and Nevada Revised Statutes (NRS), the *City of Reno* advances the principles of EJ in all programs, services, and activities through a public involvement program and by screening programs and projects to identify, avoid, minimize, or mitigate disproportionately high and adverse impacts. The City of Reno staff assists with respect to public involvement activities around the City. The transportation planning process requires the City of Reno to identify planning assumptions under federal law—one of which is to use the most recently published U.S. Census Bureau data in the development of plans and programs.

XI. Public Participation

Public outreach strategies employed by the City of Reno are often determined by circumstances unique to individual projects and typically take place during Neighborhood Advisory Board meetings. Information is distributed via the City of Reno web page or social media sites, surveys, advertising, media outreach, community events, and/or targeted presentations. The City of Reno's commitment to public participation is based firmly on the belief that public involvement fosters an open decision-making process that elicits active participation from affected individuals, groups, communities, and other public agencies.

All notices are placed on the City of Reno's web page, as are project documents referenced in the notice. All notices that may be placed in newspapers are placed in the regular body of the paper and not the legal notices section. If a proposed project is in an identified LEP community, ethnic newspapers, and radio stations are included in the noticing effort. Community facilities such as churches, community centers, and commercial businesses may be approached to post notices of the meeting.

When warranted, mailings to property owners are bilingual. As requested in advance, Title VI liaisons will coordinate efforts for language interpreters to be available at the City of Reno public meetings. Copies of Title VI documents are available upon request and may be translated as requested.

XII. Review of Directives

The City of Reno's Title VI Coordinator will review additions and changes to the City of Reno policies and directives, as part of their Title VI plan, to ensure that the content is nondiscriminatory. Review logs are used to track review activities of new policy, or changes to existing policy, and are attached as ATTACHMENT H.

XIII. Compliance & Enforcement

The City of Reno is committed to ensuring required Compliance and Enforcement Procedures. The City of Reno utilizes contractors, vendors, and consultants to complete various tasks and projects. The City of Reno directors, managers, and supervisors in each program area (Program Area Definition 3), are responsible for familiarizing themselves with the requirements of Title VI, E.O. 12898, and E.O. 13166, and for complying with the requirements of the City of Reno Title VI Program. They promptly report any issues or complaints concerning Title VI and related statutes to the Title VI Coordinator. As of this reporting period, compliance or enforcement procedures have not been enacted by the City of Reno on any of its consultants, contractors, or vendors.

Should non-compliance be found, the City of Reno shall work with the contractor, consultant, or vendor to come into voluntary compliance. If that is unsuccessful, the City of Reno shall take additional action to ensure compliance, which may include:

- a. Withholding payments to the contractor under the contract until the contractor complies; and/or
- b. Cancelling, terminating, or suspending a contract, in whole or in part.

This Title VI Plan was prepared on behalf of the City of Reno by Lexicon Support Services.

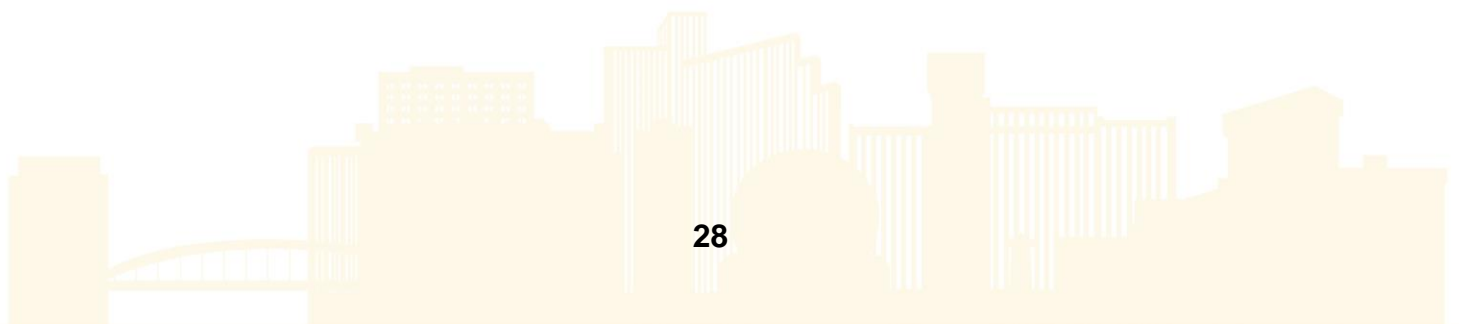
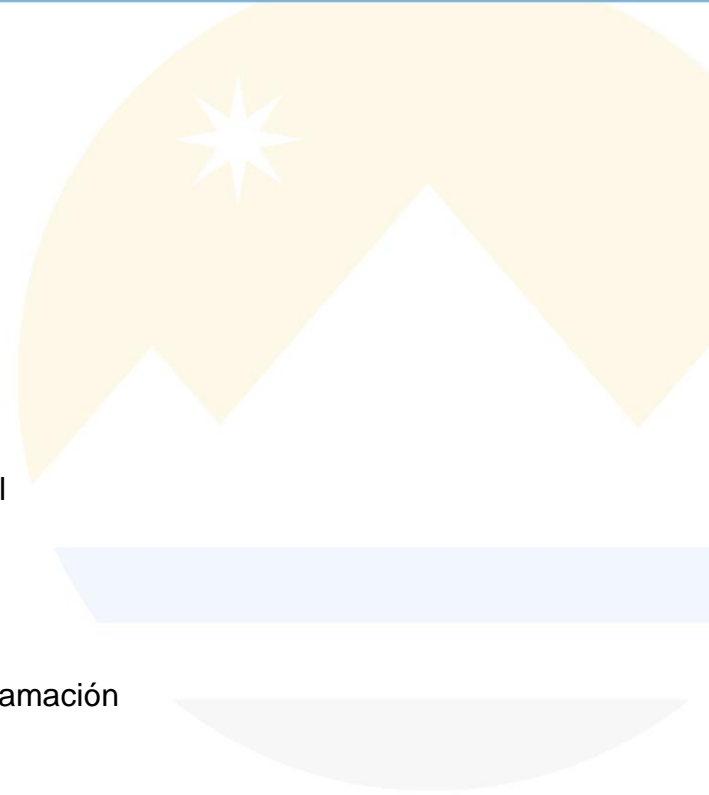
1726 Axial Drive

Loveland, Colorado 80538

702-840-1256

3. Attachments

- A. Assurances
 - B. Title VI Organizational Chart
 - C. Staff Training
 - D. Complaint Procedures – Procedimientos De Quejas
 - E. City of Reno Title VI Complaint Form – English/Español
 - G. Four Factor Analysis Data
 - H. Review of Directives Log
 - I. Title VI Investigations, Complaints, & Lawsuits Log
 - J. General Complaint Form – Formulario General De Reclamación
- Definitions



A. Assurances

The United States Department of Transportation (USDOT) Standard Title VI/Non-Discrimination

Assurances

DOT Order No. 1050.2A

The *City of Reno* (herein referred to as the "Recipient"), **HEREBY AGREES THAT**, as a condition to receiving any Federal financial assistance from the U.S. Department of Transportation (DOT), through the Federal Highway Administration, is subject to and will comply with the following:

Statutory/Regulatory Authorities

- Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d et seq., 78 stat. 252), (prohibits discrimination on the basis of race, color, national origin);
- 49 C.F.R. Part 21 (entitled Non-discrimination in Federally Assisted Programs of The Department of Transportation-Effectuation of Title VI of The Civil Rights Act Of 1964);
- 28 C.F.R. section 50.3 (U.S. Department of Justice Guidelines for Enforcement of Title VI of the Civil Rights Act of 1964);

The preceding statutory and regulatory cites hereinafter are referred to as the "Acts" and "Regulations," respectively.

General Assurances

In accordance with the Acts, the Regulations, and other pertinent directives, circulars, policy, memoranda, and/or guidance, the Recipient hereby gives assurance that it will promptly take any measures necessary to ensure 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 receives Federal financial assistance from DOT, including the Federal Highway Administration.

The Civil Rights Restoration Act of 1987 clarified the original intent of Congress, with respect to Title VI and other Non-discrimination requirements (The Age Discrimination Act of 1975, and Section 504 of the Rehabilitation Act of 1973), by restoring the broad, institutional-wide scope and coverage of these non--discrimination statutes and requirements to include all programs and activities of the Recipient, so long as any portion of the program is Federally assisted.

Specific Assurances

More specifically, and without limiting the above general Assurance, the Recipient agrees with and gives the following Assurances with respect to its Federally assisted Title VI Program:

1. The Recipient agrees that each "activity," "facility," or "program," as defined in §§ 21.23(b) and 21.23(e) of 49 C.F.R. § 21 will be (with regard to an "activity") facilitated or will be (with regard to a "facility") operated or will be (with regard to a "program") conducted in compliance with all requirements imposed by, or pursuant to the Acts and the Regulations.
2. The Recipient will insert the following notification in all solicitations for bids, Requests for Proposals for work, or material subject to the Acts and the Regulations made in connection with all Title VI and, in adapted form, in all proposals for negotiated agreements regardless of funding source:
"City of Reno , in accordance with the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252, 42 U.S.C. §§ 2000d to 2000d-4) and the Regulations, hereby notifies all bidders that it will affirmatively ensure that any contract entered into pursuant to this advertisement, disadvantaged business enterprises will be afforded full and fair 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 will insert the clauses of Appendix A and E of this Assurance in every contract or agreement subject to the Acts and the Regulations.
4. The Recipient will insert the clauses of Appendix B of this Assurance, as a covenant running with the land, in any deed from the United States effecting or recording a transfer of real property, structures, use, or improvements thereon or interest therein to a Recipient.
5. That where the Recipient receives Federal financial assistance to construct a facility, or part of a facility, the Assurance will extend to the entire facility and facilities operated in connection therewith.
6. That 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 will extend to rights to space on, over, or under such property.
7. That the Recipient will include the clauses set forth in Appendix C and Appendix D of this Assurance, as a covenant running with the land, in any future deeds, leases, licenses, permits, or similar instruments entered into by the Recipient with other parties:
 - a. for the subsequent transfer of real property acquired or improved under the applicable activity, project, or program; and
 - b. for the construction or use of, or access to, space on, over, or under real property acquired or improved under the applicable activity, project, or program.
8. That this Assurance obligates the Recipient for the period during which Federal financial assistance is extended to the program, 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 will provide for such methods of administration for the program as are found by the Secretary of Transportation or the official to whom he/she delegates specific authority to give reasonable guarantee that it, other recipients, sub-recipients, sub-grantees, contractors, subcontractors, consultants, transferees, successors in interest, and other participants of Federal financial assistance under such program will comply with all requirements imposed or pursuant to the Acts, 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 Acts, the Regulations, and this Assurance.

By signing this ASSURANCE, the *City of Reno* also agrees to comply (and require any sub-recipients, sub-grantees, contractors, successors, transferees, and/or assignees to comply) with all applicable provisions governing the Federal Highway Administration access to records, accounts, documents, information, facilities, and staff. You also recognize that you must comply with any program or compliance reviews, and/or complaint investigations conducted by the Federal Highway Administration. You must keep records, reports, and submit the material for review upon request to Federal Highway Administration, or its designee in a timely, complete, and accurate way. Additionally, you must comply with all other reporting, data collection, and evaluation requirements, as prescribed by law, or detailed in program guidance.

The *City of Reno* gives this ASSURANCE in consideration of and for obtaining any Federal grants, loans, contracts, agreements, property, and/or discounts, or other Federal-aid and Federal financial assistance extended after the date hereof to the recipients by the U.S. Department of Transportation under the Title VI Program. This ASSURANCE is binding on the *City of Reno*, other recipients, sub-recipients, sub-grantees, contractors, subcontractors and their subcontractors', transferees, successors in interest, and any other participants in the Title VI Program. The person(s) signing below is authorized to sign this ASSURANCE on behalf of the Recipient.

City of Reno

by _____

DATED _____

City Mayor

Appendix A

During the performance of this contract, the contractor, for itself, its assignees, and successors in interest (hereinafter referred to as the "contractor") agrees as follows:

1. **Compliance with Regulations:** The contractor (hereinafter includes consultants) will comply with the Acts and the Regulations relative to Non-discrimination in Federally-assisted programs of the U.S. Department of Transportation, Federal Highway Administration, as they may be amended from time to time, which are herein incorporated by reference and made a part of this contract.
2. **Non-discrimination:** The contractor, with regard to the work performed by it during the contract, will not discriminate on the grounds of race, color, or national origin in the selection and retention of subcontractors, including procurements of materials and leases of equipment. The contractor will not participate directly or indirectly in the discrimination prohibited by the Acts and the Regulations, including employment practices when the contract covers any activity, project, or program set forth in Appendix B of 49 CFR Part 21.
3. **Solicitations 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 will be notified by the contractor of the contractor's obligations under this contract and the Acts and the Regulations relative to Non-discrimination on the grounds of race, color, or national origin.
4. **Information and Reports:** The contractor will provide all information and reports required by the Acts, the Regulations, and directives issued pursuant thereto and will permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by the Recipient or the Federal Highway Administration to be pertinent to ascertain compliance with such Acts, Regulations, and instructions. Where any information required of a contractor is in the exclusive possession of another who fails or refuses to furnish the information, the contractor will so certify to the Recipient or the Federal Highway Administration, as appropriate, and will set forth what efforts it has made to obtain the information.
5. **Sanctions for Noncompliance:** In the event of a contractor's noncompliance with the Non-discrimination provisions of this contract, the Recipient will impose such contract sanctions as it or the Federal Highway Administration may determine to be appropriate, including, but not limited to:
 - c. withholding payments to the contractor under the contract until the contractor complies; and/or
 - d. cancelling, terminating, or suspending a contract, in whole or in part.
6. **Incorporation of Provisions:** The contractor will include the provisions of paragraphs one through six in every subcontract, including procurements of materials and leases of equipment, unless exempt by the Acts, the Regulations and directives issued pursuant thereto. The contractor will take action with respect to any subcontract or procurement as the Recipient or the Federal Highway

Administration may direct as a means of enforcing such provisions including sanctions for noncompliance. Provided, that if the contractor becomes involved in, or is threatened with litigation by a subcontractor, or supplier because of such direction, the contractor may request the Recipient to enter into any litigation to protect the interests of the Recipient. In addition, the contractor may request the United States to enter into the litigation to protect the interests of the United States.

Appendix B

CLAUSES FOR DEEDS TRANSFERRING UNITED STATES PROPERTY

The following clauses will be included in deeds effecting or recording the transfer of real property, structures, or improvements thereon, or granting interest therein from the United States pursuant to the provisions of Assurance 4:

NOW, THEREFORE, the U.S. Department of Transportation as authorized by law and upon the condition that the *City of Reno* will accept title to the lands and maintain the project constructed thereon in accordance with Title 23, U.S.C, the Regulations for the Administration of Title VI Program, and the policies and procedures prescribed by the Federal Highway Administration of the U.S. Department of Transportation in accordance and in compliance with all requirements imposed by Title 49, Code of Federal Regulations, U.S. Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Non-discrimination in Federally-assisted programs of the U.S Department of Transportation 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 *City of Reno* the right, title and interest of the U.S. Department of Transportation in and to said lands described in Exhibit A attached hereto and made a part hereof.

(HABENDUM CLAUSE)

TO HAVE AND TO HOLD said lands and interests therein unto the *City of Reno* and its successors forever, subject, however, to the covenants, 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 will be binding on the *City of Reno*, its successors and assigns.

The *City of Reno*, 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 will 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 *City of Reno* will use the lands and interests in lands and interests in lands so conveyed, in compliance with all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, U.S. Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Non-discrimination in Federally-assisted programs of the U.S. Department of Transportation, Effectuation of Title VI of the Civil Rights Act of 1964, and as said Regulations and Acts may be amended [, and (3) that in the event of breach of any of the above-mentioned non-discrimination

conditions, the *City of Reno* will have a right to enter or re-enter said lands and facilities on said land, and that above described land and facilities will thereon revert to and vest in and become the absolute property of the U.S. Department of Transportation and its assigns as such interest existed prior to this instruction].*

(*Reverter clause and related language to be used only when it is determined that such a clause is necessary in order to make clear the purpose of Title VI.)

Appendix C

CLAUSES FOR TRANSFER OF REAL PROPERTY ACQUIRED OR IMPROVED UNDER THE ACTIVITY, FACILITY, OR PROGRAM

The following clauses will be included in deeds, licenses, leases, permits, or similar instruments entered into by the *City of Reno* pursuant to the provisions of Assurance 7(a):

- A. The (grantee, lessee, permittee, etc. as appropriate) for himself/herself, his/her heirs, personal representatives, 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:
 1. In the event facilities are constructed, maintained, or otherwise operated on the property described in this (deed, license, lease, permit, etc.) for a purpose for which a U.S. Department of Transportation activity, facility, or program is extended or for another purpose involving the provision of similar services or benefits, the (grantee, licensee, lessee, permittee, etc.) will maintain and operate such facilities and services in compliance with all requirements imposed by the Acts and Regulations (as may be amended) such that no person on the grounds of race, color, or national origin, will be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination in the use of said facilities.*
- B. With respect to licenses, leases, permits, etc., in the event of breach of any of the above Non-discrimination covenants, the *City of Reno* will have the right to terminate the (lease, license, permit, etc.) and to enter, re-enter, and repossess said lands and facilities thereon, and hold the same as if the (lease, license, permit, etc.) had never been made or issued.*
- C. With respect to a deed, in the event of breach of any of the above Non-discrimination covenants, the *City of Reno* will have the right to enter or re-enter the lands and facilities thereon, and the above described lands and facilities will there upon revert to and vest in and become the absolute property of the *City of Reno* and its assigns.**

*As it relates to Federally Funded DOT Projects

**Reverter clause and related language to be used only when it is determined that such a clause is necessary to make clear the purpose of Title VI.

Appendix D

CLAUSES FOR CONSTRUCTION/USE/ACCESS TO REAL PROPERTY ACQUIRED UNDER THE ACTIVITY, FACILITY OR PROGRAM*

The following clauses will be included in deeds, licenses, permits, or similar instruments/agreements entered into by the *City of Reno* pursuant to the provisions of Assurance 7(b):

- A. The (grantee, licensee, permittee, etc., as appropriate) for himself/herself, his/her heirs, personal representatives, 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 (1) no person on the ground of race, color, or national origin, will be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination in the use of said facilities, (2) that in the construction of any improvements on, over, or under such land, and the furnishing of services thereon, no person on the ground of race, color, or national origin, will be excluded from participation in, denied the benefits of, or otherwise be subjected to discrimination, (3) that the (grantee, licensee, lessee, permittee, etc.) will use the premises in compliance with all other requirements imposed by or pursuant to the Acts and Regulations, as amended, set forth in this Assurance.
- B. With respect to (licenses, leases, permits, etc.), in the event of breach of any of the above Non-discrimination covenants, the *City of Reno* will have the right to terminate the (license, permit, etc., as appropriate) and to enter or re-enter and repossess said land and the facilities thereon, and hold the same as if said (license, permit, etc., as appropriate) had never been made or issued.*
- C. With respect to deeds, in the event of breach of any of the above Non-discrimination covenants, the *City of Reno* will there upon revert to and vest in and become the absolute property of the *City of Reno* and its assigns. *

*As it relates to Federally Funded DOT Projects

**Reverter clause and related language to be used only when it is determined that such a clause is necessary to make clear the purpose of Title VI.

Appendix E

To the extent applicable, during the performance of this contract, the contractor, for itself, its assignees, and successors in interest (hereinafter referred to as the "contractor") agrees to comply with the following non-discrimination statutes and authorities; including but not limited to:

Pertinent Non-Discrimination Authorities:

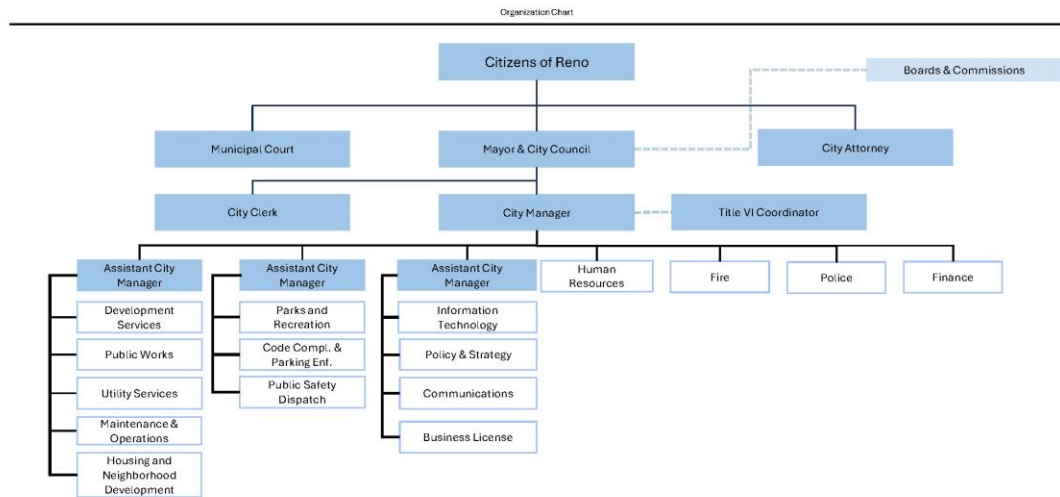
- Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d et seq., 78 stat. 252), (prohibits discrimination on the basis of race, color, national origin); and 49 CFR Part 21.
- The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, (42 U.S.C. § 4601), (prohibits unfair treatment of persons displaced or whose property has been acquired because of Federal or Federal-aid programs and projects);
- Federal-Aid Highway Act of 1973, (23 U.S.C. § 324 et seq.), (prohibits discrimination on the basis of sex);
- Section 504 of the Rehabilitation Act of 1973, (29 U.S.C. § 794 et seq.), as amended, (prohibits discrimination on the basis of disability); and 49 CFR Part 27;
- The Age Discrimination Act of 1975, as amended, (42 U.S.C. § 6101 et seq.), (prohibits discrimination on the basis of age);
- Airport and Airway Improvement Act of 1982, (49 USC § 471, Section 47123), as amended, (prohibits discrimination based on race, creed, color, national origin, or sex);
- The Civil Rights Restoration Act of 1987, (PL 100-209), (Broadened the scope, coverage, and applicability of Title VI of the Civil Rights Act of 1964, The Age Discrimination Act of 1975 and Section 504 of the Rehabilitation Act of 1973, by expanding the definition of the terms "programs or activities" to include all of the programs or activities of the Federal-aid recipients, sub-recipients, and contractors, whether such programs or activities are Federally funded or not);
- Titles II and III of the Americans with Disabilities Act, which prohibit discrimination on the basis of disability in the operation of public entities, public and private transportation systems, places of public accommodation, and certain testing entities (42 U.S.C. §§ 12131-12189) as implemented by Department of Transportation regulations at 49 C.F.R. parts 37 and 38;
- The Federal Aviation Administration's Non-discrimination statute (49 U.S.C. § 47123) (prohibits discrimination on the basis of race, color, national origin, and sex);
- Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, which ensures Non-discrimination against minority populations by discouraging programs, policies, and activities with disproportionately high and adverse human health or environmental effects on minority and low-income populations.
- Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency, and resulting agency guidance, national origin discrimination includes discrimination because of Limited English proficiency (LEP). To ensure compliance with Title VI, you must take reasonable steps

to ensure that LEP persons have meaningful access to your programs (70 Fed. Reg. at 74087 to 74100);

- Title IX of the Education Amendments of 1972, as amended, which prohibits you from discriminating because of sex in education programs or activities (20 U.S.C. 1681 et seq)

B. Title VI Organizational Chart

City Council



C. Staff Training

The City of Reno is in the process of implementing a Title VI/Nondiscrimination Training Program for the City of Reno staff.

The training will be conducted upon hire, every year for general employees, every year for directors, and managers, and newly hired or promoted employees within six months.

Staff will be provided with training annually to include policies, procedures, appropriate NRS, and the City of Reno Public Participation Plan elements, as required, that encompasses the required content and awareness of incorporating Title VI into their day-to-day activities, as well as to ensure compliance with Title VI in all City programs and activities.

In addition, all staff will be given the City of Reno Language Assistance Plan (LAP) summary that outlines our policies and commitment to Limited English Proficiency persons (LEP), provides resources for assistance, and ensures all staff comply with the City of Reno Title VI Plan.

The Title VI Coordinator will track and maintain staff awareness training in Title VI and submit staff sign-in sheets annually to NDOT.

D. Complaint Procedures – Procedimientos De Quejas

The complaint procedures are available on the *City of Reno's* web page and covers the following:

- Title VI of the Civil Rights Act of 1964
- Section 504 of the Rehabilitation Act of 1973
- Civil Rights Restoration Act of 1973
- Civil Rights Restoration Act of 1987
- Americans with Disabilities Act of 1990
- Executive Order 12898
- Executive Order 13166

Any person, specific class of persons or entity that believes they have been subjected to discrimination as prohibited by the legal provisions of Title VI based on race, color, or national origin status may file a formal complaint with the City of Reno Title VI Coordinator. A copy of the Complaint Form is available on the City of Reno web page and may be accessed electronically at: www.reno.gov.

Title VI Complaint Reporting

The complaint must be filed within 180 days of the alleged discrimination and include the date the alleged discrimination became known to the complainant or the last date of the incident.

The complaint must be written and signed by the complainant and shall include:

The Complainant(s) name, address, and phone number;

- A detailed description of the alleged incident that led the complainant to believe discrimination occurred;
- The date of the alleged act of discrimination, the date when the complainant(s) became aware of the alleged discrimination, the last date of the conduct or the date or the date the conduct was discontinued;
- The names and job titles of those parties involved in the complaint;
- The facts and circumstances surrounding the alleged discrimination and the basis of the complaint (i.e., race, color, national origin, sex, age, disability, income status or retaliation);
- Names and contact information of persons whom the investigator can contact for additional information to support or clarify the allegations; and
- Corrective action being sought by the complainant. Complaints may be filed by one of the following methods:
 - By completing and signing the Complaint Form and delivering it in person or by mail;
 - By emailing or faxing the Complaint Form and sending the signed original to the Title VI Coordinator; and
 - For the disabled, by calling the Title VI Coordinator where information obtained will be used to complete the Complaint Form and, subsequently, forwarded to the complainant for review, signature, and return.

Upon receipt of a completed complaint, the Title VI Coordinator will determine authority, acceptability or need for additional information and, within five days, acknowledge receipt of the complaint and the intended course of action.

- NDOT has sole authority for and will adjudicate all complaints filed against NDOT sub-recipients;
- Complaints against the *City of Reno* in USDOT-funded programs will be referred to NDOT and/or USDOT for processing; and
- Complaints under all other federally funded programs fall under NDOT's authority and jurisdiction.

For acceptance, a complaint must be:

- Timely filed;
- Involve a covered basis (i.e., race, color, or national origin); and

Complaints may be dismissed if the complainant:

- Requests the withdrawal of the complaint;
- Fails to respond to repeated requests for additional information;
- Fails to cooperate in the investigation; or
- Cannot be located after reasonable attempts to reach the complainant have been made.

Complaints that fall under the jurisdiction of USDOT – NDOT Civil Rights Officer, will forward a copy of the complaint and preliminary finding to USDOT-HCR within 60 days. Once USDOT-HCR issues its final decision, it will notify NDOT and, NDOT will notify all parties involved.

All allegations of discrimination will be taken seriously, and every effort will be made to provide a fair and unbiased determination. In instances where there is dissatisfaction with NDOT's determination, the complainant may file a complaint directly with the appropriate USDOT modality:

- US Department of Transportation, Federal Highway Administration, Nevada Division 705 North Plaza Street, Suite 220 Carson City, NV 89701-0602;
- US Department of Transportation, Federal Highway Administration, Office of Civil Rights 1200 New Jersey Ave. SE, Washington, DC 20590;
- US Department of Transportation, Federal Transit Administration FTA Office of Civil Rights, 1200 New Jersey Ave. SE, Washington, DC 20590

Los procedimientos de queja están disponibles en la página web de la *Ciudad de Reno*

y cubren lo siguiente:

- Título VI de la Ley de Derechos Civiles de 1964
- Sección 504 de la Ley de Rehabilitación de 1973
- Ley de Restauración de los Derechos Civiles de 1973
- Ley de Restauración de los Derechos Civiles de 1987
- Ley de Estadounidenses con Discapacidades de 1990
- Orden Ejecutiva 12898
- Orden Ejecutiva 13166

Cualquier persona, clase específica de personas o entidad que crea que ha sido objeto de discriminación según lo prohibido por las disposiciones legales del Título VI por motivos de raza, color o estado de origen nacional puede presentar una queja formal ante el Coordinador del Título VI de la *Ciudad de Reno*. Una copia del Formulario de Queja está disponible en la página web de la *Ciudad de Reno* y se puede acceder a él electrónicamente en: www.reno.gov.

Reporte de Quejas del Título VI

La queja debe presentarse dentro de los 180 días posteriores a la presunta discriminación e incluir la fecha en que el denunciante tuvo conocimiento de la presunta discriminación o la última fecha del incidente.

La queja debe ser escrita y firmada por el denunciante e incluirá:

El nombre, la dirección y el número de teléfono del demandante o demandantes;

- Una descripción detallada del presunto incidente que llevó al autor a creer que hubo discriminación;
- La fecha del presunto acto de discriminación, la fecha en que el denunciante o denunciantes tuvieron conocimiento de la presunta discriminación, la última fecha de la conducta o la fecha o la fecha en que se interrumpió la conducta;
- Los nombres y cargos de las partes involucradas en la queja;
- Los hechos y circunstancias que rodean la presunta discriminación y la base de la queja (es decir, raza, color, origen nacional, sexo, edad, discapacidad, estado de ingresos o represalias);
- Nombres e información de contacto de las personas con las que el investigador puede ponerse en contacto para obtener información adicional que respalde o aclare las acusaciones; y
- Medidas correctivas solicitadas por el demandante. Las quejas se pueden presentar por uno de los siguientes métodos:
 - Completando y firmando el Formulario de Queja y entregándolo en persona o por correo;
 - Enviando por correo electrónico o fax el Formulario de Queja y enviando el original firmado al Título VI Coordinator; y
 - Para los discapacitados, llamando al Coordinador del Título VI donde la información obtenida se utilizará para completar el Formulario de Queja y, posteriormente, se

enviará al denunciante para su revisión, firma y devolución.

Al recibir una queja completa, el Coordinador del Título VI determinará la autoridad, la aceptabilidad o la necesidad de información adicional y, dentro de los cinco días, acusará recibo de la queja y el curso de acción previsto.

- El NDOT tiene la autoridad exclusiva para juzgar todas las quejas presentadas contra los subreceptores del NDOT y lo resolverá; Las quejas contra la *Ciudad de Reno*
- en los programas financiados por el USDOT se remitirán al NDOT y/o al USDOT para su procesamiento; y
- Las quejas bajo todos los demás programas financiados por el gobierno federal caen bajo la autoridad y jurisdicción del NDOT.

Para su aceptación, la queja debe ser:

- Presentado oportunamente;
- Involucran una base cubierta (es decir, raza, color u origen nacional); y

Las quejas pueden ser desestimadas si el denunciante:

- Solicita el retiro de la denuncia;
- No responde a las repetidas solicitudes de información adicional;
- No coopera en la investigación; o
- No se puede localizar después de que se hayan realizado intentos razonables de comunicarse con el denunciante.

Las quejas que caen bajo la jurisdicción del USDOT - Oficial de Derechos Civiles de NDOT, enviarán una copia de la queja y el hallazgo preliminar al USDOT-HCR dentro de los sesenta días. Una vez que el USDOT-HCR emita su decisión final, notificará al NDOT y al NDOT notificará a todas las partes involucradas.

Todas las acusaciones de discriminación se tomarán en serio y se hará todo lo posible para proporcionar una determinación justa e imparcial. En los casos en que no esté satisfecho con la determinación del NDOT, el demandante puede presentar una queja directamente con la modalidad apropiada del USDOT:

- Departamento de Transporte de EE. UU., Administración Federal de Carreteras, División de Nevada 705 North Plaza Street, Suite 220 Carson City, NV 89701-0602;
- Departamento de Transporte de EE. UU., Administración Federal de Carreteras, Oficina de Derechos Civiles 1200 New Jersey Ave. SE, Washington, DC 20590;
- Departamento de Transporte de EE. UU., Administración Federal de Tránsito FTA Oficina de Derechos Civiles, 1200 New Jersey Ave. SE, Washington, DC 20590

E. City of Reno Title VI Complaint Form – English/Español

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

Please provide the following information necessary to process your complaint. Assistance is available upon request. Complete this form and mail or deliver to the City of Reno, Title VI Coordinator, 1 E. First Street, Reno, NV 89501.

Complainant Name:		
Street Address:		
City:	State:	Zip Code:
Phone (home):	Phone (cell or other):	

You were discriminated against because of:

_____ Race

_____ National Origin

_____ Color

Date of Incident _____

Time of Incident _____

Person discriminated against (if someone other than complainant):

Complainant Name:		
Street Address:		
City:	State:	Zip Code:
Phone (home):	Phone (cell or other):	

Have you filed this complaint with any other federal, state, or local agency or with any federal or state court? Yes _____ No _____

If yes, check all that apply and provide name of agency and contact information:

<input type="checkbox"/>	Federal Agency:	Contact:
Contact's Phone:		Contact's Email:
<input type="checkbox"/>	Federal Court:	Contact:
Contact's Phone:		Contact's Email:
<input type="checkbox"/>	State Agency:	Contact:
Contact's Phone:		Contact's Email:
<input type="checkbox"/>	State Court:	Contact:
Contact's Phone:		Contact's Email:
<input type="checkbox"/>	Local Agency:	Contact:
Contact's Phone:		Contact's Email:
<input type="checkbox"/>	Other:	Contact:
Contact's Phone:		Contact's Email:

Have you filed a lawsuit regarding this complaint? Yes _____ No _____

In your own words, describe the alleged discrimination. Explain what happened and whom you believe was responsible. You should include specific details such as names, dates, times, route numbers, witnesses, and any other information that would assist us in our investigation of the allegations. Please provide any other documentation that is relevant to this complaint.

Check if additional sheets attached

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

Signature:	Date:
------------	-------

Mail or deliver this form to:
City of Reno
Title VI Coordinator
1 E 1st St
Reno, NV 89501
titlevicoordinator@reno.gov

Date Received:	By Whom:
----------------	----------

El Título VI de la Ley de Derechos Civiles de 1964 establece que "Ninguna persona en los Estados Unidos, por motivos de raza, color u origen nacional, será excluida de la participación, se le negarán los beneficios o será objeto de discriminación bajo cualquier programa o actividad que reciba asistencia financiera federal".

Proporcione la siguiente información necesaria para procesar su queja. La asistencia está disponible bajo petición. Complete este formulario y envíelo por correo o entréguelo a la *Ciudad de Reno*, Coordinador del Título VI, 1 E. 1st St, Reno, NV 89501.

Nombre:		
Dirección:		
Ciudad:	Estado:	Código Postal:
Número de Teléfono (de la casa):	Número de Teléfono (otros):	

¿Cual de los siguientes describe mejor la razón por la supuesta discriminación?

_____ Raza

_____ Origen Nacional

_____ Color

Fecha del Incidente _____

Hora del Incidente _____

Persona discriminada:

Nombre:		
Dirección:		
Ciudad:	Estado:	Código Postal:
Número de Teléfono (de la casa):	Número de Teléfono (otros):	

¿Ha presentado esta queja con cualquier otra agencia federal, estatal o local o con cualquier corte federal o estatal? Sí _____ No _____

En caso afirmativo, marque todo lo que corresponda y proporcionar el nombre de la agencia y la información de contacto:

<input type="checkbox"/>	Agencia Federal:	Póngase en contacto con:
Nº de teléfono de contacto:		Email de contacto:
<input type="checkbox"/>	Corte Federal:	Póngase en contacto con:
Nº de teléfono de contacto:		Email de contacto:
<input type="checkbox"/>	Agencia Estatal:	Póngase en contacto con:
Nº de teléfono de contacto:		Email de contacto:
<input type="checkbox"/>	Corte Estatal:	Póngase en contacto con:
Nº de teléfono de contacto:		Email de contacto:
<input type="checkbox"/>	Local Agency:	Póngase en contacto con:
Nº de teléfono de contacto:		Email de contacto:
<input type="checkbox"/>	Otros:	Póngase en contacto con:
Nº de teléfono de contacto:		Email de contacto:

¿Ha presentado una demanda respecto a esta queja? Si _____ No _____

En sus propias palabras, describa la supuesta discriminación. Explique lo que pasó y quien considera que fue responsable . Usted debe incluir detalles específicos, tales como nombres , fechas, horas , números de ruta , testigos, y cualquier otra información que nos pueda ayudar en nuestra investigación de las alegaciones . Por favor proporcione cualquier otra documentación que sera relevante para la presente queja.

Hojas adicionales adjuntas

Por favor firme abajo. Puede adjuntar cualquier material escrito o cualquier otra información que usted considere relevante para su queja.

Firma:	Fecha:
--------	--------

Envíe por correo o entregar este formulario a:

Ciudad de Reno
Coordinador del Título VI
1 E. 1st St
Reno, NV 89501
titlevicoordinator@reno.gov

Fecha de recibo:	Por quien:
------------------	------------

G. Four Factor Analysis Data

		Reno city, Nevada Estimate	1000 or more of eligible Population	More than 5% of the eligible population and more than 50 12565.05	More than 5% of the eligible population and less than 50	5% or less of the eligible population and less than 1000
Speak only English		251301				
Spanish:		192776				
Spanish:		37814				
Spanish:	Speak English less than "very well"	12670	12670	5.04%	0	0
French, Haitian, or Cajun:		1043	1043	0.42%	0	0
French, Haitian, or Cajun:	Speak English less than "very well"	192	0	0.08%	0	0
German or other West Germanic languages:		892	0	0.35%	0	0
German or other West Germanic languages:	Speak English less than "very well"	19	0	0.01%	0	0
Russian, Polish, or other Slavic languages:		812	0	0.32%	0	0
Russian, Polish, or other Slavic languages:	Speak English less than "very well"	210	0	0.08%	0	0
Other Indo-European languages:		4770	4770	1.90%	0	0
Other Indo-European languages:	Speak English less than "very well"	1338	1338	0.53%	0	0
Korean:		371	0	0.15%	0	0
Korean:	Speak English less than "very well"	187	0	0.07%	0	0
Chinese (incl. Mandarin, Cantonese):		1916	1916	0.76%	0	0
Chinese (incl. Mandarin, Cantonese):	Speak English less than "very well"	873	0	0.35%	0	0
Vietnamese:		680	0	0.27%	0	0
Vietnamese:	Speak English less than "very well"	413	0	0.16%	0	0
Tagalog (incl. Filipino):		5754	5754	2.29%	0	0
Tagalog (incl. Filipino):	Speak English less than "very well"	1783	1783	0.71%	0	0
Other Asian and Pacific Island languages:		2429	2429	0.97%	0	0
Other Asian and Pacific Island languages:	Speak English less than "very well"	696	0	0.28%	0	0
Arabic:		257	0	0.10%	0	0
Arabic:	Speak English less than "very well"	39	0	0.02%	0	0
Other and unspecified languages:		1787	1787	0.71%	0	0
Other and unspecified languages:	Speak English less than "very well"	524	0	0.21%	0	0

H. Review of Directives Log

Month of _____'s

Review of Policy & Directives

Directive/Policy Title		Action Taken	Reviewers Initials

I. Title VI Investigations, Complaints, & Lawsuits Log

TITLE VI COMPLAINT LOG

YEAR _____

CASE NO	COMPLAINANT	RESPONDENT	AGENCY FILED WITH	DATE FILED	BASIS	DATE OF REPORT	DECISION

J. General Complaint Form – Formulario General De Reclamación

The *City of Reno* is committed to extending nondiscrimination requirements to include associated nondiscrimination regulations including, but not limited to the Federal Highway Act of 1973 (Sex), the Age Discrimination Act of 1975 (Age), the Americans with Disabilities Act of 1990 (ADA), Section 504 of the Rehabilitation Act of 1973 (Disability), Executive Order 13166, and Executive Order 12898.

Please provide the following information necessary in order to process your complaint. Assistance is available upon request. Complete this form and mail or deliver to the City of Reno, Title VI Coordinator 1 E. First Street, Reno NV 89501.

Complainant Name:		
Street Address:		
City:	State:	Zip Code:
Phone (home):	Phone (cell or other):	

You were discriminated against because of:

- Sex
- Age
- Disability
- EO 13166 (LEP)
- EO 12898 (EJ)
- Other (Please list) _____

Date of Incident _____
 Time of Incident _____

Person discriminated against (if someone other than complainant):

Complainant Name:		
Street Address:		
City:	State:	Zip Code:
Phone (home):	Phone (cell or other):	

Have you filed this complaint with any other federal, state, or local agency or with any federal or state court?

Yes___ No___

If yes, check all that apply and provide name of agency and contact information:

<input type="checkbox"/>	Federal Agency:	Contact:
Contact's Phone:		Contact's Email:
<input type="checkbox"/>	Federal Court:	Contact:
Contact's Phone:		Contact's Email:
<input type="checkbox"/>	State Agency:	Contact:
Contact's Phone:		Contact's Email:
<input type="checkbox"/>	State Court:	Contact:
Contact's Phone:		Contact's Email:
<input type="checkbox"/>	Local Agency:	Contact:
Contact's Phone:		Contact's Email:
<input type="checkbox"/>	Other:	Contact:
Contact's Phone:		Contact's Email:

Have you filed a lawsuit regarding this complaint? Yes___ No___

In your own words, describe the alleged discrimination. Explain what happened and whom you believe was responsible. You should include specific details such as names, dates, times, route numbers, witnesses, and any other information that would assist us in our investigation of the allegations. Please provide any other documentation that is relevant to this complaint.

Check if additional sheets attached

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

Signature:	Date:
------------	-------

Mail or deliver this form to:
City of Reno
Title VI Coordinator
1 E. First Street
Reno, NV 89501
titlevicoordinator@reno.gov

Date Received:	By Whom:
----------------	----------

La Ciudad de Reno se compromete a extender los requisitos de no discriminación para incluir regulaciones asociadas de no discriminación, incluyendo, pero no limitado a la Ley Federal de Carreteras de 1973 (Sexo), la Ley de Discriminación por Edad de 1975 (Edad), la Ley de Estadounidenses con Discapacidades de 1990 (ADA), la Sección 504 de la Ley de Rehabilitación de 1973 (Discapacidad), la Orden Ejecutiva 13166 y la Orden Ejecutiva 12898.

Proporcione la siguiente información necesaria para procesar su queja. La asistencia está disponible bajo petición. Complete este formulario y envíelo por correo o entréguelo a la Ciudad de Reno, Coordinador del Título VI 1 E. 1st St, Reno, NV 89501.

Nombre del denunciante:		
Dirección:		
ciudad:	estado:	Código Postal:
Teléfono (inicio):	Teléfono (celular u otro):	

Usted fue discriminado debido a:

- sexo
- edad
- discapacidad
- EO 13166 (LEP)
- OE 12898 (EJ)
- Otros (Lista) _____

Fecha del incidente _____

Hora del incidente _____

Persona discriminada (si es alguien que no sea el denunciante):

Nombre del denunciante:		
Dirección:		
ciudad:	estado:	Código Postal:
Teléfono (inicio):	Teléfono (celular u otro):	

¿Ha presentado esta queja ante cualquier otra agencia federal, estatal o local o con cualquier agencia federal o estatal?

¿tribunal? Sí ___ No ___

En caso afirmativo, verifique todo lo que se aplique y proporcione el nombre de la agencia y la información de contacto:

Agencia Federal:	contacto:
Teléfono del contacto:	Correo electrónico del contacto:
Tribunal Federal:	contacto:
Teléfono del contacto:	Correo electrónico del contacto:
Agencia Estatal:	contacto:
Teléfono del contacto:	Correo electrónico del contacto:
Tribunal Estatal:	contacto:
Teléfono del contacto:	Correo electrónico del contacto:
Agencia Local:	contacto:
Teléfono del contacto:	Correo electrónico del contacto:
Otro:	contacto:
Teléfono del contacto:	Correo electrónico del contacto:

¿Ha presentado una demanda con respecto a esta queja? Sí No_____

En sus propias palabras, describa la supuesta discriminación. Explique lo que sucedió y quién cree que fue el responsable. Debe incluir detalles específicos como nombres, fechas, horas, números de ruta, testigos y cualquier otra información que nos ayude en nuestra investigación de las acusaciones. Sírvase proporcionar cualquier otra documentación que sea pertinente para esta queja.

Compruebe si las hojas adicionales adjuntas

Por favor, firme a continuación. Puede adjuntar cualquier material escrito u otra información que crea que es relevante para su queja.

firma:	fecha:
--------	--------

Envíe por correo o entregar este formulario a:

Ciudad de Reno
Coordinador del Título VI
1 E 1st St
Reno, NV 89501
titlecoordinator@reno.gov

Definitions

Policy² - A policy is a set of ideas or plans that is used as a basis for making decisions, especially in politics, economics, or business. 2022.

Program Area³ - Title VI monitoring will be accomplished in the respective program areas, such as planning, design build, project development, right-of-way, construction, research, complaints, and records and reports. n.d.

Public Service Area⁴ - Public Service Area means areas of a Place of Public Accommodation or an Educational Institution wherein employees interact with the public in the normal course of business. A geographical area where services, programs, or activities are provided to/in. n.d.

Real Property⁵ - That which consists of land, and of all rights and profits arising from and annexed to land, of a permanent, immovable nature. n.d.

Services of Public Works⁶ - Consisting of the construction, repair, renovation, or maintenance of public buildings, structures, sewers, water works, roads, bridges, docks, underpasses and viaducts, as well as any other improvement to be constructed, repaired or renovated or maintained on public property to be paid, in whole or in part, with public funds or with financing to be retired with public funds in the form of lease payments or otherwise. n.d.

² *Collins COBuild Advanced Learner's Dictionary. HarperCollins Publishers.*

³ *49 C.F.R. § 21.7(b).*

⁴ *Law Dicitonary/Public Works/Public Service Area*

⁵ *A Law Dictionary, Adapted to the Constitution and Laws of the United States. John Bouvier.*

⁶ *23 CFR § 635.502 Law Dicitonary/Public Works.*