

Village of Pinckney Title VI Management Plan

Notice:

This plan was developed to guide the Village of Pinckney in its administration and management of Title VI-related activities. It is a working plan and is not codified within the Village Charter nor its ordinances.

As with any other Village activity, the public is invited to review and submit comments and suggestions at any time regarding the Title VI program.

Suggestions and comments may be submitted to the attention of the Title VI Coordinator, 220 S. Howell Street, Pinckney, MI 481690, or to any member of the Human Relations Commission.

Village of Pinckney Title VI Management Plan

I. Statement of Policy:

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

II. Applicability:

Program or Activity defined: A program or activity is any Village department defined by the municipal charter or any organizational structure implemented by the elected officials of the Village, and any appropriate board or commission established to facilitate the work of such department.

This policy applies to all activities of any department if any federal assistance is received by that department.

III. Title VI Coordinator/Human Relations Commission:

The Village President shall designate a Village employee to serve as the Title VI Coordinator. Departments which typically receive Federal funding assistance (Parks and Recreation, Police, and Streets) shall refer to the Title VI coordinator whose primary responsibility is to provide an in-place person to facilitate Title VI matters.

The Clerk shall serve as the advisor for the Title VI function, and shall provide follow up as necessary to the Title VI matters.

VI. Record Keeping:

The Title VI Coordinator will maintain permanent records, submit required Title VI reports and complete all Title VI self-surveys. Records may include, but are not limited to, rosters of Non-Elected Boards and Commissions, copies of complaints and related documentation, records of correspondence to and from complainants, and self-surveys requested by a department of the State of Michigan.

VII. Title VI Information Dissemination:

Title VI information posters, including the name of the Title VI Coordinator and contact information, shall be prominently and publicly displayed at Village Hall.

Title VI information shall be disseminated to Village employees at least once per year. Delivery options may include, but are not limited to payroll stuffers, e-mail, departmental staff

meetings. The information reminds employees of the Village's policy statement, and of their Title VI responsibilities in their daily work and duties.

During New Employee Orientation, new employees shall be informed of the provisions of Title VI, and the Village's expectations to perform their duties accordingly.

Title VI information shall be disseminated to citizens through the Village website.

Whenever possible, the Village of Pinckney will take positive and specific actions to advise minorities of program availability by using such means of communication as local news media, mass media, internet messaging, and public area postings.

VIII. Subcontracts and Vendors:

All subcontractors and vendors who receive payments from the Village of Pinckney where funding originates from any federal assistance received by the involved department are subject to the provisions of Title VI of the Civil Rights Act of 1964 as amended.

Written contracts shall contain non-discrimination language, either directly or through the bid specification package which becomes an associated component of the contract. Nonprocurement contractors shall be required to submit an annual Title VI survey for the Village Coordinator to review, and shall provide a labor-force race/gender census report prior to contract award consummation.

IX. Public Interaction:

Village facilities (such as restrooms, park facilities, sidewalks, streets, etc.) which are accessible to citizens shall be accessible without regard to race, color, or national origin.

Village employees shall use courtesy titles (i.e. Mr., Mrs., Ms., or Miss) to address citizens without regard to race, color or national origin.

X. Complaint Management:

SUBMITTING COMPLAINTS

All complaints shall be accepted, written or verbal. Should a complainant present allegations of Title VI discrimination verbally and refuse to submit the complaint in writing, the Title VI Coordinator will reduce the elements of the complaint to written form. The complainant will be required to read the staff-prepared complaint and sign and date the transcript of the verbal complaint. Refusal to sign the complaint will provide basis for administrative closure of the complaint. No unsigned, undated complaint will be considered. The complaint must be filed within 180 calendar days of the alleged incident.

Complaint information shall minimally include the following items:

1. Name, address, and phone number of the complainant.
2. Name and location of the Village entity delivering the service.
3. A description of the incident that led the complainant to feel discrimination occurred.
4. The basis of the complaint (race, color, or national origin) must be stated.
5. Names, addresses, and phone numbers of other persons who may have knowledge of the alleged discrimination.
6. The date or dates on which the alleged discrimination occurred.

The Title VI Complaint Form (see Appendix) may be used to submit the complaint information, but its use is not required. If the complaint form is not used, the Title VI Coordinator may request that the complainant provide any additional details that may be included on the Complaint Form to ensure information needs are satisfied.

All complaints shall be responded to, recorded, investigated, and records maintained by the Title VI Coordinator.

COMPLAINT PROCESSING

When a complaint is received, the Title VI Coordinator will assign a case number and construct a case file.

The Title VI Coordinator will review the complaint information prepare a letter to the complainant acknowledging the complaint (and requesting additional information, if necessary).

The complaint will be investigated by the Title VI Coordinator. Interviews with complainant, other persons with personal knowledge of the allegations, and Village entities affected will be conducted. Parties may be accompanied by other persons of their choosing during any interview session.

The Title VI Coordinator will prepare a report of the findings of fact and a recommended action, and submit the report to the Personnel Committee for consideration.

The Personnel Committee will review the case and render a finding that the alleged discrimination is substantiated or not substantiated. This finding will be submitted to the Title VI Coordinator in writing, and all case materials will be returned to the Title VI Coordinator.

The Title VI Coordinator will advise the complainant by certified mail of the findings of the review, and the actions that will follow.

All complaints will be handled within 60 days of their filing with the Title VI Coordinator.

In the event a complaint is filed against the Village or a Village department, and not an individual, the Title VI Coordinator will close the complaint case and forward the complaint information to the appropriate state entity.

An advisory will be forwarded to the appropriate state agency whenever any complaint has been received by the Title VI Coordinator.

XI. Public Involvement Plan – Capital Improvement Projects

Introduction

This section of the plan lays the foundation for public involvement in planning for Village of Pinckney capital improvement projects. Public participation is encouraged throughout the project and will be incorporated into the decision-making process.

Public involvement is critical to the planning process and serves to inform the public as well as solicit public response regarding the community's needs, values and evaluations of proposed solutions.

There may be many different types of solutions, each having advantages and disadvantages. These alternative solutions can be discussed with the public to receive input and ultimately reach a solution that will best meet the Village 's needs. Situation Analysis

The Village will carefully identify the needs and interests of the constituency it serves focusing on human health and safety, protection of property values, the economic vitality of the area, and environmental considerations in the process of identifying, prioritizing, designing, and implementing capital improvement projects.

Public Involvement Objectives

To create an open and visible decision-making process to which stakeholders have equal access and input.

To provide a mechanism by which stakeholders are informed and have an understanding of the process, issues, and possible solutions from the perspectives of various interests.

To incorporate public comments throughout the decision-making process.

Public Involvement Tools and Tactics

The following provides a partial list of community outreach and media relations tools and tactics that may be used to disseminate information about the program and provide an opportunity to solicit and incorporate public input throughout the process. These tools may be used singly or in combination, as each situation merits.

Community Outreach Media Relations

Public Meetings Public Service Announcements
Public Meeting Comment Cards News Releases
Public Meeting Notice Fliers Calendar Releases
Community Presentations Newspaper Articles
Fact Sheets Broadcast Coverage
Web Site

Example of Process

Public Notification

Public meeting notice advertisements
Notice on web site
Media Coverage: news releases, calendar releases, articles, Radio PSAs

Solicitation of Comments from Stakeholders

Public meetings
Comment cards
Web site
Questionnaires/Surveys

Incorporate Public Comments and Respond to Inquiries

XII. Procedure for Communicating with Limited English Proficiency Residents

In the event a person with Limited English Proficiency (LEP) initiates any contact with Village personnel regarding activities, projects, or communication items, it behooves the Village to provide the best services, information, or response possible, as with persons who have no language barrier.

The Village of Pinckney does not discriminate against anyone with Limited English Proficiency (LEP) who participates in our programs and/or services. We have taken steps to ensure that all individuals will be able to communicate, either through written or oral language services, with all members of our staff. These steps are as follows:

1. If the need is not urgent or life threatening, employees will defer to their supervisors what steps need to be taken. The steps include but are not limited to, the following:
 - a) If the need is for a document to be translated, the supervisor will have the document translated as soon as possible, without jeopardizing his/her duties as a supervisor.
 - b) If the need is for oral language interpretive services, the supervisor will take appropriate actions to provide assistance as soon as possible.

- c) The supervisor has the obligation to the safety of his/her employees as well as to the people of the Village of Pinckney to assist the needs of all persons. This includes not leaving his/her work place unless it is an emergency.

At all times, maintain a gracious, friendly attitude to put the resident at ease, and to indicate our attempt to be helpful.

XIII. Contracting and Minority Contractor Relationships

The Village is subject to Michigan law governing the awarding of contracts. Most simply stated, contracts are to be let to the “lowest and best bidder.” Other variables cannot be inserted into non-emergency purchasing decisions.

To ensure minority-owned and women-owned businesses are afforded opportunity to be considered for contracts, the Village may expand the various means of publicizing bid announcements. While some funding agencies may require specific advertising activities, most procurement activities do not. In those cases, any or all of the following means of reaching potential vendors may be used:

- Advertising in local/state-wide news media
- Internet posting on the Village website
- Notice posted on public bulletin board by the entrance to Village Hall
- All vendors who have completed a Vendor Application listing the service/commodity are sent a bid notice
- SBA Website search may be conducted
- Former contract holders may be contacted
- Internet searches for potential vendors

On occasion, specific minority contractor participation goals may set by funding agencies. Large projects may result in the procurement of a prime contractor. During pre-bid and preconstruction conferences, potential prime contractors are advised of the minority contractor goals and the efforts required to seek sub-contract opportunities for the small contractor within the overall prime contract scope of work. This communication responsibility lies with the Village project director.

APPENDIX

SPECIAL NOTE:

All material in the Appendix is ancillary to the Management Plan, and is subject to change on an unannounced basis.

APPENDIX 1

Employee Annual Education Information

Title VI Policy

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

All employees of the Village of Pinckney are expected to consider, respect and observe this policy in their daily work and duties. If a citizen approaches you with a question or complaint, direct him or her to the Village Clerk at Village Hall, phone number 734-878-6206.

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

APPENDIX 2

New Employee Orientation on Title VI

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

All employees of the Village of Pinckney are expected to consider, respect and observe this policy in their daily work and duties. If a citizen approaches you with a discrimination question or complaint that appears to be based on some type of discrimination, direct him or her to the Title VI Coordinator, currently the Village Clerk.

APPENDIX 3

Title VI Discrimination Complaint Form

Case Number _____

Note: We are asking for the following information to assist us in processing your complaint. If you need help in completing this form, please let us know. If you are not able to complete the form personally, the Title VI Coordinator will assist you to do so at a mutually convenient time. Simply call 931-553-2416 to make your request. If the Title VI Coordinator assists you in completing the form, you will still need to sign it to validate the information provided.

1. Complainant's Name _____

Street Address _____

City, State and Zip Code _____

Telephone Numbers (____) _____; (____) _____

2. Person discriminated against (if someone other than the complainant)

Name _____

Street Address _____

City, State, and Zip Code _____

Telephone Number (____) _____

3. What is the name and location of the person/department that you believe discriminated against you?

Name _____

Department _____

4. Why do you believe someone discriminated against you? Was it because of your:

a. Race (specify why)

b. Color (specify why)

c. National Origin (specify why)

d. What date did the alleged discrimination take place?

(Must be within the past 180 days)

5. In your own words, describe what happened, and whom you believe was responsible.

(Use more sheets or the back of this page, if needed)

6. Have you tried to resolve this complaint through internal grievance procedures at the Village? _____ Yes _____ No

If yes, what is the status of the grievance?

Name and title of the person who is handling the grievance procedure.

Name _____ Title _____

7. Have you filed this complaint with any other government agency or court?
_____ Yes _____ No

If yes, check all that apply:

Federal agency _____

Federal court _____

State agency _____

State court _____

Local agency _____

8. Please provide information about a contact person at the other agency/court where the complaint was filed.

Name _____

Street Address _____

City, State, and Zip Code _____

Telephone Number (_____) _____

9. Do you intend to file this complaint with another agency?
_____ Yes _____ No

If yes, when and where do you plan to file the complaint?

Date _____

Agency _____

Street Address _____

City, State, and Zip Code _____

Telephone Number (_____) _____

10. Has the complaint been filed with the Village before?
_____ Yes _____ No

If yes, when? Date _____

11. Have you filed any other discrimination complaints with the Village ?
_____Yes _____No

If yes, when and against whom were they filed?

Date _____

Agency _____

Street Address _____

City, State, and Zip Code _____

Telephone Number (_____) _____

12. Please sign and date this form below. You may attach any written materials or other information that you think is relevant to your complaint.

Complainant's Signature

Date

If this form was completed by someone other than the complainant, please provide information about who assisted the citizen with this document:

APPENDIX 4

Today's Date

Letter Acknowledging Receipt of Complaint

Ms. Jo Doe
1234 Main St.
Pinckney, Michigan 48169

Dear Ms. Doe:

This letter is to acknowledge receipt of your complaint against the Village of Pinckney alleging _____ in the _____ program

An investigation will begin shortly. If you have additional information you wish to convey or questions concerning this matter, please feel free to contact this office by telephoning 734-878-6206, or writing to me at this address.

Sincerely,

[Clerk],
Title VI Coordinator

APPENDIX 5

Today's Date

Letter Notifying Complainant That Complaint is Substantiated

Ms. Jo Doe
1234 Main St.
Pinckney, Michigan 48169

Dear Ms. Doe:

The matter referenced in your letter of _____(date) against the Village of Pinckney alleging denial of participation of minorities in the _____program has been investigated.

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

Thank you for calling this important matter to our attention. You were extremely helpful during our review of the program. ***(If a hearing is requested, the following sentence may be appropriate.)*** You may be hearing from this office, or from federal authorities, if your services should be needed during the administrative hearing process.

Sincerely,

[clerk]
Title VI Coordinator

APPENDIX 6

Today's Date

Letter Notifying Complainant that the Complaint Is Not Substantiated

Ms. Jo Doe
1234 Main St.
Pinckney, Michigan 48169

Dear Ms. Doe:

The matter referenced in your complaint of _____ (date) against the Village of Pinckney alleging _____ in the _____ program has been investigated.

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

The Clarksville Human Rights Commission has analyzed the materials and facts pertaining to your case for evidence of the Village 's failure to comply with any of the civil rights laws. There was no evidence found that any of these laws have been violated.

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

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

Sincerely,

[Clerk]
Title VI Coordinator

APPENDIX G Contract Monitoring Form

Name of Company _____

Type of Business _____

Ethnicity and Gender of Contractor's Workforce

	Ethnicity	Gender	
		Male	Female
Black/African-American	_____	_____	_____
American Indian/Alaska Native	_____	_____	_____
Asian	_____	_____	_____
Caucasian	_____	_____	_____
Hispanic	_____	_____	_____
Native Hawaiian/other Pacific Islander	_____	_____	_____
Other (specify)	_____	_____	_____

This Workforce Summary is a required document that must be submitted to the Purchasing Department prior to signature by the Village 's Signing Authority.

APPENDIX H Contractor/Consultant Title VI Monitoring Report

Name of Contractor: _____ Date Completed: _____

Address: _____

Village: _____ State: _____ Zip: _____

Phone: _____ e-mail: _____

This survey is to be completed and submitted to the Village of Pinckney Title VI Coordinator for review once a year while the contract is active.

1. Are Title VI posters visible to staff? If yes, where?

2. Are all Physical Areas (i.e. restrooms, dining rooms, waiting rooms, etc.) provided without regard to race, color, or national origin?

3. How is Title VI information disseminated to new/current employees?

4. Describe how certified Disadvantaged Business Enterprises(DBEs), other small, minority and women-owned businesses are solicited to participate on sub-contracts

5. What process has been established to track and monitor ethnicity and gender of any contractors awarded sub-contracts?

Provide documentation to show that sub-contracts contain non-discrimination assurance language

6. Describe your complaint procedures for race or ethnic issues; what documents do you maintain regarding race/ethnic complaints?

7. How do you communicate with persons that speak a language other than English?

The following Title VI Assurance is to Be Submitted on Company Letterhead:

_____ assures that no person shall, on the grounds of
(Contractor/Consultant Name)

race, color, national origin, or sex, as provided by Title VI of the Civil Rights Act of 1964 and as amended, and the Civil Rights Restoration Act of 1987 (P.I. 100.259) be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving Federal financial assistance from the Michigan Department of Transportation (TDOT).

DECLARATION OF RESPONDENT: I declare that I have completed this form to the best of my knowledge and believe it to be true and correct.

Name of Authorized Official

Date

Submit this document to the attention of:

Title VI Coordinator
Village of Pinckney
220 S. Howell Street
Pinckney, MI 48169

Ph: 734-878-6206