



The City of Hattiesburg
in conjunction with Urban Development,
the Department of Federal and State Programs and the
Metropolitan Planning Division

TITLE VI

Compliance Plan

July, 2017



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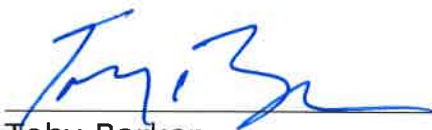
Over the past decade, a renewed emphasis on Title VI issues and environmental justice has become a more integral part of the transportation planning and programming process throughout the United States, particularly in urban regions. This renewed commitment to Title VI has, and continues to be, reflected in the City of Hattiesburg's work program, publications, communications, and public involvement efforts. This document establishes a framework for efforts that will be taken at the City of Hattiesburg to ensure compliance with Title VI and related statutes regarding nondiscrimination and environmental justice.

Title VI Plan Policy Statement

The City of Hattiesburg (City) assures that no person shall on the grounds of race, color, sex, age, disability or national origin, as provided by Title VI of the Civil Rights Act of 1964, and the Civil Rights Restoration Act of 1987 (P.L. 100.259) be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity. The City further assures every effort will be made to ensure nondiscrimination in all of its programs activities, whether those programs and activities are federally funded or not.

In the event that the city distributes federal aid funds to another entity, the City will include Title VI language in all written agreements and will monitor for compliance.

The Department of Federal and State Programs is responsible for initiating and monitoring Title VI activities, preparing required reports and other City responsibilities as required by 23 Code of Federal Regulation (CFR) 200 and 49 Code of Federal Regulation 21.



Toby Barker
Mayor, City of Hattiesburg

8-8-17

Date

Mayor's Statement on Limited English Proficiency

The City of Hattiesburg welcomes diversity and has taken steps to insure that those who come to our City can participate in and enjoy to the fullest all our

great City has to offer.

The City of Hattiesburg is proud of our efforts to insure that inclusiveness and fairness are a part of all of our activities. It is our intention to be proactive in extending our services and programs to all who wish to participate, including our Limited English Proficiency (LEP) residents. The City's Department of Federal and State Programs leads the way in celebrating our differences and drawing strength from our similarities.

The Policy Statement that precedes this page shows our commitment to Title VI and our fairness in contracting. By signing below, I am reaffirming the City's efforts to reach out to the LEP community and insure that they are a part of the City's democratic processes. This is a step I gladly take, as inclusiveness and fairness are an integral part of this City.



Toby Barker
Mayor, City of Hattiesburg

8-8-17

Date

Authorities

Title VI of the 1964 Civil Rights Act 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 otherwise subjected to discrimination under any program or activity receiving federal financial

assistance (please refer to 23 CFR 200.9 and 49 CFR 21).

Civil Rights Restoration Act of 1987 broadened the scope of Title VI coverage by expanding the definition of terms "programs or activities" to include all programs or activities of Federal Aid recipients, sub-recipients, and contractors, whether such programs and activities are federally assisted or not (Public Law 100259 [2.557] March 22, 1988).

Additional Authorities and Citations Include:

Title VI of the Civil Rights Act of 1964, 42 United States Code 2000d to 2000-4; 42 United States Code 4601 to 4655; 23 United States Code 109(h); 23 United States Code 324; Department of Transportation Order 1050.2; Executive Order 12250; Executive Order 12898; 29 Code of Federal Regulations, 50.3.

Title VI Delegation Chart

CITY OF HATTIESBURG, MISSISSIPPI

Toby Barker Mayor
601-545-4501

City Attorney
Moran M. Pope III
Attorney 601-545-4501

Director
Department of Federal and State Programs
La'Keylah White
601-545-4590

Organization and Staffing - General

The Mayor of the City of Hattiesburg is responsible for ensuring the implementation of the City's Title VI program. The Director of the Federal and State Programs, on behalf of the Mayor, is responsible for the overall management of the Title VI programs, and serves as the Title VI Liaison Officer. The day-to-day administration of the program will be carried out by the Title VI Coordinator, as assigned, (hereafter referred to as "Coordinator") under the

direct supervision of the Director of the Federal and State Programs.

General Title VI Program Responsibilities

Following are general Title VI responsibilities of the agency. The Title VI Liaison is responsible for ensuring these elements of the plan are appropriately implemented and maintained;

1. Data collection
2. Annual Title VI Report
3. Title VI complaint procedures
4. Annual review of Title VI program
5. Dissemination of Information
6. Resolution of Complain

Title VI Liaison and Responsibilities

The Title VI Liaison is responsible in implementing, monitoring, and reporting on the City's compliance with Title VI regulations. In support of this, the Title VI Liaison will:

- Identify, investigate, and eliminate discrimination when found to exist.
- Process Title VI complaints received by the City.
- Meet with Coordinators quarterly to monitor and discuss progress, implementation, and compliance issues.
- Periodically review the agency's Title VI program to assess if administrative procedures are effective, staffing is appropriate, and adequate resources are available to ensure compliance.
- Work with Coordinators to develop and submit the Annual Title VI Report to MDOT, FHWA, and FTA by the end of October each year.
- If a sub recipient is found to not be compliance with Title VI, work with the Consultant Contracts Liaison and sub recipient to resolve the deficiency status and write a remedial action if necessary.
- Review important Title VI-related issues with the City Attorney, as needed.
- Assess communications and public involvement strategies to ensure adequate participation of impacted Title VI protected groups and address additional language needs when needed.

Program Administration - General

As Title VI Liaison, the Director of the Department of Federal and State Programs shall be responsible for coordinating the overall administration of the Title VI program, plan, and assurances (see Addendum 1).

A. Complaints

If any individual believes that s/he or any other program beneficiaries have been subjected to unequal treatment or discrimination in their receipt of benefits and/or services, or on the grounds of race, color, national origin, sex disability or age, s/he may exercise their right to file a complaint with the City. Every effort will be made to resolve complaints informally at the City and contractor level. These complaints will be addressed according to the Title VI circular and will adhere to the timeframes therein.

B. Data Collection

Statistical data on race, color, national origin and sex of participants in, and beneficiaries of federally funded program, (e.g., relocates, impacted citizens, and affected communities), will be gathered and maintained by the Title VI Coordinator. Each of the Title VI special emphasis program areas will maintain data to be incorporated in the Title VI Annual Update. The data gathering process will be reviewed regularly to ensure sufficiency of the data in meeting the requirements of the Title VI program administration.

C. Operational Guidelines/Program Directives

All operational guidelines to regions, contractors, sub recipients, and special emphasis program areas will be reviewed annually to include Title VI language and provisions and related requirements, where applicable.

D. Training Program

Title VI training will be made available at least annually to employees, contractors, sub recipients, and special emphasis program area liaisons. The training will provide comprehensive information on Title VI provisions, application to program operations, and identification of Title VI issues and resolution of complaints. A summary of the training conducted will be reported in the annual update.

E. Title VI Plan Update

A Title VI Plan Update will be submitted to FTA every three years. The update will report on data collection, changes to the program, upcoming projects and public feedback occurring during the three period..

F. Public Dissemination

The Title VI Liaison will disseminate Title VI Program information to City employees, sub recipients, contractors, and beneficiaries as well as the general

public. Public dissemination will include the posting of public statements, inclusion of Title VI language in contracts, and publishing annually the Title VI Policy Statement in newspapers having a general circulation in the vicinity of proposed projects and announcements of hearings and meetings in minority publications (see Addendum 3).

G. Post-grant Reviews

Post-grant approval procedures (e.g. highway location design, relocation and individuals seeking contracts, etc.) will be reviewed thoroughly to ensure compliance with Title VI requirements.

H. Remedial Action

The City will actively pursue the prevention of Title VI deficiencies and violations and will take the necessary steps to ensure compliance with all program administrative requirements. When irregularities occur in the administration of the program's operation, corrective action will be taken to resolve Title VI issues, and reducing to writing a remedial action agreed upon to be necessary, all within a period not to exceed 90 days.

1) Sub recipients placed in a deficiency status will be given a reasonable time, (not to exceed 90 days after receipt of the deficiency letter), to voluntarily correct deficiencies.

2) The City will seek the cooperation of the sub recipient in correcting deficiencies found during the review. The City will also provide the technical assistance and guidance needed to aid the sub recipient to comply voluntarily.

3) When a sub recipient fails or refuses to voluntarily comply with requirements within the time frame allotted, the City will submit to MDOT Civil Rights Office or the FHWA two copies of the case file and a recommendation that the sub recipient be found in noncompliance.

4) A follow-up review will be conducted within 180 days of the initial review to ensure that the sub recipient has complied with the Title VI Program requirements in correcting deficiencies previously identified.

I. Procedures Manual

Administration of the Title VI Program will be incorporated in a Procedures Manual that will be updated regularly to incorporate changes and additional responsibilities.

Title VI Responsibilities for Special Emphasis Program Areas

Planning

A. Department of Federal and State Programs – City of Hattiesburg and the Hattiesburg-Petal-Forrest-Lamar Metropolitan Planning Organization
HPFL-MPO has the responsibility to develop long- and short-range plans to provide efficient transportation services to the citizens of the City of Hattiesburg and Hattiesburg Urbanized Area.

B. Operational Guidelines
Hattiesburg Municipal Code
Executive Order 12898 on Environmental Justice
Executive Order 13166 on Providing Meaningful Access to Individuals Who Are Limited English Proficient to Federally Assisted and Federally Conducted Programs and Activities

Metropolitan Planning Organization Procedures Manual 23 CFR 450
RCW 47.06 Statewide Transportation Planning
RCW 47.80 Regional Transportation Planning Organization

C. Planning Process
The City annually updates and coordinates the City's future transportation improvement plans and programs. A comprehensive transportation planning process is used which incorporates input from the public in coordination with the various jurisdictions affected. Planning includes the monitoring and collection of data.

D. Title VI Responsibilities
Ensure that all aspects of the planning process operation comply with Title VI.

- Ensure that various social, economic, and ethnic interest groups are represented in the planning process by disseminating program information to minority media and ethnic/gender related organizations and participating in roundtable meetings in predominantly minority communities.
- Assist the Title VI Coordinator in gathering and organizing the Planning special program emphasis area section of the Annual Title VI Update Report.
- Review the department work program and other directives to ensure compliance with Title VI program requirements.
- Visit public meetings to verify the level of participation of Title VI protected group members when offered in predominantly ethnic minority communities.
- Ensure that Limited English Proficiency (LEP) individuals who will be affected by planned projects receive meaningful access into the public

awareness/involvement process. Meaningful access means that the affected parties will receive the necessary communicative assistance required to allow them participation in governmental services/activities.

Environmental Justice

A. Mississippi Department of Transportation (MDOT)

MDOT assist in integrating environmental considerations and regulatory requirements into the City's transportation program, provide technical expertise for project analyses, develop environmental policies, procedures, manuals, and training and work with regulatory agencies to streamline the environmental permit process.

MDOT use a systematic process to study and evaluate all necessary environmental aspects of a proposed project, including its social and economic impacts. Depending on the scope, complexity, and impacts of the project, a National Environmental Policy Act (NEPA) Categorical Exclusion (CE), NEPA Environmental Assessment (EA), State Environmental Policy Act (SEPA) checklist, SEPA Determination of Non-significance (DNS), or NEPA and/or SEPA Environmental Impact Statement are completed. MDOT also develop agreements, guidance documents, and training programs with the regulatory and resource agencies.

B. Operational Guidelines

Executive Order 12898 on Environmental Justice

Executive Order 13166 on Providing Meaningful Access to Individuals Who Are Limited English Proficient to Federally Assisted and Federally Conducted Programs and Activities

National Environmental Policy Act (NEPA), Title 23 CFR 771, Title 49 CFR 622, 635, 640, 712, 771

All regulations are administered by the Federal Highway Administration.

MDOT Project Development Manual

C. Title VI Responsibilities

- Monitor compliance with Title VI requirements in all aspects of the environmental process.
- Conduct meetings to review the project impact.

- Disseminate to the public their rights to call or write the department to view plans and discuss environmental problems.
- Coordinate the gathering of environmental information for the Annual Title VI Update Report, including awards to DBE firms.
- Notify affected protected group residents of public meetings or hearings regarding a proposed project, and make meetings and hearings accessible.
- Develop mechanisms to identify the population affected by a project.
- Ensure that Limited English Proficiency (LEP) individuals who will be affected by locating and citing actions receive meaningful access into the public awareness/involvement process. Meaningful access means that the affected parties will receive the necessary communicative assistance required to allow them to participate in governmental services/activities.
- Ensure public participation in the location selection process.
- Ensure Title VI/Environmental Justice compliance in all Environmental Impact Statements.

Right of Way

A. City of Hattiesburg (COH) and Mississippi Department of Transportation

The COH will manage and coordinate the appraisal and acquisition of real property for transportation needs, the management of excess properties, and relocation assistance services.

B. Operational Guidelines

Executive Order 13166 on Providing Meaningful Access to Individuals Who Are Limited English Proficient to Federally Assistive and Federally Conducted Programs and Activities.

Local Agencies Guideline Manual Right of Way Manual

ROW Standard Operating Procedures

ROW Manual

23 CFR 130

49 CFR 24

C. Acquisition Process

The property acquisition process follows the ROW Standard Operating Procedures and all applicable laws and regulations, including Title VI. The right of way acquisition process entails appraisal of property, negotiation of terms and conditions for acquisition, and assistance in the relocation of displaced individuals, business, farm operations, and nonprofit organizations, as well as property management.

D. Title VI Responsibilities

- Ensure participation by Minority/Women Disadvantaged Business Enterprises as identified by the MDOT DBE Office in consulting contracts. The contracts are typically appraisal contracts but can cover all services of real estate including negotiation, relocation, and property management.
- Ensure participation by minority/women disadvantaged business appraisers by reviewing updates to DBE directories identifying fee appraiser organizations.
- Apprise affected property owners, tenants, and others involved of their rights and options regarding negotiation, relocation, condemnation and other aspects of the acquisition process.
- Ensure that Limited English Proficiency (LEP) individuals who will be affected by right of way activities/decisions receive meaningful access into the public awareness/involvement process. Meaningful access means that the affected parties will receive the necessary communicative assistance required to allow them to participate in governmental services/activities.
- Conduct annual implementation reviews of Title VI provisions within the entire real estate acquisition process.
- Incorporate Title VI language and assurance statements in all surveys of property owners and tenants after the conclusion of all business.
- Ensure that appraised values and communications associated with the appraisal and negotiation operations result in equitable treatment.
- Ensure comparable replacement dwellings are available and assistance is given to all displaced persons and entities by the property acquisition process.
- Coordinate the preparation of deeds, permits and leases to ensure the inclusion of the appropriate Title VI clauses.

- Gather the statistical data required for completion of the Annual Title VI Update Report, including awards to minority and female appraisers.

Construction/Maintenance

A. The City of Hattiesburg (COH)—Department of Engineering

COH is responsible for the administration of new federally funded construction. This department is responsible for the preservation and upkeep of the local transportation system throughout the City.

B. Operational Guidelines

Local Agencies Guideline Manual

MDOT Project Development Manual Construction Manual

Maintenance's Standard Operating Procedures

Standard Specifications for Road and Bridge Construction 23 CFR Part 200

49 CFR Part 21

C. Construction and Maintenance Process

COH is responsible for developing an efficient program for federally-funded projects and road maintenance by utilizing the resources of people, equipment, and materials in the most economical way. The COH set policy and provide guidance and oversight for the administration of transportation construction projects by the City.

D. Title VI Responsibilities

- Monitor all maintenance operations to ensure nondiscrimination.
- Review activities and programs to assure that maintenance and construction efforts and resources are applied uniformly and fairly.
- Review all projects for application of DBE program requirements.
- Include DBE general special provisions in projects with assigned goals.
- Include Title VI language in contract advertisements and award letters to encourage the utilization of DBE firms. Award construction contracts on the basis of the lowest responsive bidder including DBE requirements.

- Ensure thorough reviews that prime contractors with DBE requirements award have previously committed work to proper DBEs, and that DBEs actually performed a commercially useful function on the contracts.
- Consult DBE firms to identify possible barriers to their participation in contracts. Use this information to eliminate such barriers.
- Provide supportive services to DBEs.
- Include Title VI language in every contract to ensure nondiscrimination in contract awards due to race or gender.
- Coordinate the gathering of maintenance and construction information regarding DBE participation for the Title VI Annual Update Report.

Design

A. The City of Hattiesburg Department of Public Services/Engineering and Mississippi Department of Transportation

These departments perform studies to assess various environmental factors, including social and economic elements, as they relate to project development.

B. Operational Guidelines

MDOT Project Development Manual

Executive Order 12898 on Environmental Justice AASHTO Design Manual 23 CFR 771

Executive Order 12898 on Environmental Justice Standard Operating Procedures

C. Design Process

Economic, social, topographic, and the environmental impact of a proposed project are key factors weighed in the location consideration. Federal, state, local, and departmental policies and procedures require that public hearings and/or informational meetings be held to give all citizens an opportunity to obtain information and express their opinions on proposed project locations. Special efforts shall be made to inform members of minority communities of public hearings and other public involvement activities. These efforts include public notices in minority newspapers and selection of accessible location and time for public hearings.

D. Title VI Responsibilities

- Ensure that all aspects of the location selection process comply with the Title VI requirements.
- Consult and seek input from affected populations.
- Develop mechanisms to identify affected populations.
- Ensure public participation in the selection process.
- Provide notice of public hearings and meetings in minority newspapers and newsletters.
- Maintain required Title VI compliance documentation and statistical data.
- Monitor program components for compliance with the Title VI requirements.
- Review activities associated with public hearings to enhance the participation of targeted communities.
- Develop and update operational manuals and directives to ensure the inclusion of Title VI language and provisions.
- Gather program area data to be included in the Title VI Annual Update Report.

Education and Training

A. Minorities, women, veterans, individuals with a disability, and other individuals protected by Title VI and federal and state anti-discrimination laws are provided with equal opportunities and fair treatment in all employment-related decisions, including opportunities for education and training.

B. Operational Guidelines:

Employee Handbook

Affirmative Action Plan

C. Employees Encouraged to Participate in Training

All employees are encouraged to participate in professional development and training. All materials received by the agency on training and education opportunities are made available to all employees, which includes all information on federally funded training, such as courses provided by the National Highway

Institute (NHI) and the National Transit Institute (NTI).

D. Title VI Responsibilities

- Evaluating and monitoring compliance with Title VI requirements in all aspects of the education and training program.
- Provide information on training opportunities open to City staff and sub recipients, including information on training provided by NHI and NTI.
- Assist in the distribution of information on training programs regarding Title VI and related statutes.
- Ensure equal access to, and participation in, applicable NHI and NTI courses for qualified employees.
- Track participation in Title VI, NHI, and NTI courses.
- Establish, maintain, and update a Title VI Procedures Manual containing all day-to-day administration of the Title VI Program.

Consultant Services

A. Department of Administration Purchasing Division – City of Hattiesburg

The DOA Purchasing Division is responsible for setting policy and establishing procedures for consultant selection, negotiation, and administration of consultant contracts for the City.

B. Operational Guidelines

Mississippi Municipal Code

Consultant Services Procedures Manual) Standard Operating Procedures

23 CFR 172

48CFR 31

23 CFR 172

C. Consultant Selection Process

Each City department may contract directly for consultant services. The departments are required to follow the guidelines produced by the Purchasing Division. Upon the initial request of a consultant contractor's services, the Purchasing Division is available to assist the department's project manager with negotiation and administration of the contract.

D. Title VI Responsibilities

- Monitor DBE program requirements.
- Ensure that all federally funded consultant contracts administered by the City have the appropriate Title VI provisions included.
- Review directives and procedures to ensure Title VI compliance.
- Maintain necessary data and documentation required for completion of the department's Title VI Update Annual Report.

Addendum I

Title VI Assurances

Title VI Assurances

The City of Hattiesburg (hereinafter referred to as the "Recipient"), HEREBY AGREES THAT as a condition to receiving any federal financial assistance from the U.S. Department of Transportation it will comply with Title VI of the Civil Rights Act of 1964, 78 Stat. 252, 42 USC 2000d-42 USC 2000d-4 (hereinafter referred to as the Act), and all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, part 21, Nondiscrimination in Federally Assisted Programs of the Department of Transportation-Effectuation of Title VI of the Civil Rights Act of 1964 (hereinafter referred to as the Regulations), and other pertinent directives, to the end that in accordance with the Act, Regulations, and other pertinent directives, no person in the United States shall, on the grounds of race, color, sex, 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 the Department of Transportation, including the Federal Highway Administration, and HEREBY GIVES ASSURANCE THAT it will promptly take any measures necessary to effectuate this agreement. This Assurance is required by Subsection 21.7(a)(1) of the Regulations.

More specifically and without limiting the above general assurance, the Recipient hereby gives the following specific assurances to its Federal Aid Highway Program.

1. That the Recipient agrees that each "program" and each "facility" as defined in Subsections 21.23(e) and 21.23(b) of the Regulations, will be (with regard to a "program") conducted, or will be (with regard to a "facility") operated in compliance with all requirements imposed by, or pursuant to, the Regulations.

2. That the Recipient shall insert the following notification in all solicitations for bids for work or material subject to the Regulations made in connection with the Federal Aid Highway Program, and in adapted form in all proposals for negotiated agreements:

The City of Hattiesburg in accordance with Title VI of the Civil Rights Act of 1964 and 78 Stat. 252, 42 USC 2000d-d4 and Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, part 21, Nondiscrimination in federally assisted programs of the Department of Transportation issued pursuant to such

Act, hereby notifies all bidders that it will affirmatively ensure that any contract entered into pursuant to this advertisement, minority business enterprises will be afforded full opportunity to submit bids in response to this invitation and will not be discriminated against on the grounds of race, color, sex, or national origin in consideration for an award.

3. That the Recipient shall insert the clauses of Appendix 1 of this Assurance in every contract subject to the Act and the Regulations.

4. That the Recipient shall insert the clauses of Appendix 2 of this Assurance, as a covenant running with the land, in any deed from the United States effecting a transfer of real property, structures, or improvements thereon, or interest therein.

5. That where the Recipient receives federal financial assistance to construct a facility, or part of a facility, the Assurance shall extend to the entire facility and facilities operated in connection therewith.

6. 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 shall extend rights to space on, over or under such property.

7. That the Recipient shall include the appropriate clauses set forth in Appendix 3 of this Assurance, as a covenant running with the land, in any future deeds, leases, permits, licenses, and similar agreements entered into by the Recipient with other parties: (a) for the subsequent transfer of real property acquired or improved under the Federal Aid Highway Program; and (b) for the construction or use of or access to space on, over or under real property acquired, or improved under the Federal Aid Highway Program.

8. That this Assurance obligates the Recipient for the period during which

federal financial assistance is extended to the program, or is in the form of, personal property, or real property or interest therein or structures or improvements thereon, in which case the Assurance obligates the Recipient or any transferee for the longer of the following periods: (a) the period during which the property is used for a purpose for which the federal financial assistance is extended, or for another purpose involving the provision of similar services or benefits; or (b) the period during which the Recipient retains ownership or possession of the property.

9. The Recipient shall provide for such methods of administration for the program as are found by the Secretary of Transportation, or the official to whom s/he delegates specific authority to give reasonable guarantee that it, other recipients, sub grantees, contractors, subcontractors, transferees, successors in interest, and other participants of federal financial assistance under such program will comply with all requirements imposed or pursuant to the Act, the Regulations, and this Assurance.

10. The Recipient agrees that the United States has a right to seek judicial endorsement with regard to any matter arising under the Act, the Regulations, and this Assurance.

THIS ASSURANCE is given in consideration of and for the purpose of obtaining any and all federal grants, loans, contracts, property, discounts or other federal financial assistance extended after the date hereof to the Recipient by the Department of Transportation under the Federal Aid Highway Program and is binding on it, other recipients, sub grantees, contractors, subcontractors, transferees, successors in interest and other participants in the Federal Aid Highway Program. The person or persons whose signatures appear below are authorized to sign the Assurance on behalf of the Recipient.



Toby Barker
Mayor, City of Hattiesburg

8-8-17

Date

Addendum 2

Non-discrimination Complaint Procedures for Federally Assisted Programs or Activities

These procedures cover all complaints filed under Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, Civil Rights Restoration Act of 1987, and the Americans with Disabilities Act of 1990, relating to any program or activity administered by the City as to sub recipients, consultants, and contractors.

Intimidation or retaliation of any kind is prohibited by law.

The procedures do not deny the right of the complainant to file formal complaints with other state or federal agencies or to seek private counsel for complaints alleging discrimination.

Every effort will be made to obtain early resolution of complaints at the lowest level possible. The option of informal mediation meeting(s) between the affected parties and the Title VI Coordinator may be utilized for resolution.

Procedure

1. Any individual, group of individuals or entity believing they have been subjected to discrimination may file a written complaint with the City. A formal complaint must be filed within 180 days of the alleged occurrence.
2. Upon receipt of the complaint, the Title VI Liaison will determine its jurisdiction, acceptability, need for additional information, and investigative merit of the complaint. Once the Title VI Coordinator decides the course of action for the complaint, the complainant and the respondent will be notified in writing of such determination within five working days of receipt of complaint.
3. The Title VI Liaison will provide the respondent with the opportunity to

respond in writing to the allegations made by the complainant. The respondent will have 10 working days from receipt of notification to furnish a response to the allegations.

4. If the complaint is against one of City's sub recipients of federal funds, the City will have 15 working days from receipt of the complaint to advise MDOT as to the status of the investigation.

5. Within 60 working days of the receipt of the complaint, the investigator will prepare a written report for the Title VI Liaison. The report shall include a narrative description of the incident, identification of persons interviewed, findings, and recommendations for disposition.

6. The investigative report and findings of the complaint will be sent to City Attorney for review.

7. The recommendation shall be reviewed by the Title VI Liaison. The Title VI Liaison will then discuss the report with the Department of Administration Director.

8. Once the City completes its investigative report and finding, the complainant and respondent shall receive a copy of the investigative report and will be notified of their appeal rights.

9. Out briefings will be scheduled with each party within 15 days of their receipt of the investigative report.

10. A copy of the complaint and the City's investigation report will be issued to MDOT within 60 days of the receipt of the complaint.

11. After receiving MDOT's comments, out briefings will be scheduled with all relevant parties to the complaint.

12. If the complainant is not satisfied with the results of the investigation of the alleged discriminatory practice(s), s/he shall be advised of her/his rights to appeal the City's decision to MDOT and USDOT. The complainant has 180 days after the City's final resolution to appeal to MDOT and USDOT. Unless new facts not previously considered come to light, reconsideration (appeal) by the City is not being available.

Addendum 3

Title VI Notice to Public

The City hereby gives public notice that it is the policy of the department to ensure full compliance with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987 Executive Order 12898 on Environmental Justice, and related statutes and regulations in all programs and activities. Title VI requires that no person in the United States of America shall, on the grounds of race, color, sex, or national origin be excluded from the participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which the City receives federal financial assistance.

Any person who believes he or she has been aggrieved by an unlawful discriminatory practice under Title VI has a right to file a formal complaint with the City. Any such complaint must be in writing and filed with the City's Title VI Coordinator within one hundred eighty (180) days following the date of the alleged discriminatory occurrence. Title VI Discrimination Complaint Forms may be obtained from City of Hattiesburg at no cost to the complainant by calling 601-545-1006.

Appendix 1

Contractor Title VI Requirements

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 shall comply with the Regulations relative to nondiscrimination in federally assisted programs of the Department of Transportation (hereinafter DOT), Title 49, Code of Federal Regulations, part 21, as they may be amended from time to time (hereinafter referred to as the Regulations), which are herein incorporated by reference and made a part of this contract.

2. Nondiscrimination

The contractor, with regard to the work performed by it during the contract, shall not discriminate on the grounds of race, color, sex, or national origin in the selection and retention of subcontractors, including procurement of materials and leases of equipment. The contractor shall not participate either directly or indirectly in the discrimination prohibited by Section 21.5 of the Regulations, including employment practices when the contract covers a program set forth in Appendix B of the Regulations.

3. Solicitations for Subcontractors, Including Procurement of Materials and Equipment

In all solicitations either by competitive bidding or negotiations made by the contractor for work to be performed under a subcontract, including procurement of materials or leases of equipment, each potential subcontractor or supplier shall be notified by the contractor of the contractor's obligations under this contract and the Regulations relative to nondiscrimination on the grounds of race, color, sex, or national origin.

4. Information and Reports

The contractor shall provide all information and reports required by the Regulations or directives issued pursuant thereto, and shall permit access to its books, records, accounts, other sources of information, and its facilities as may be determined by the City, Washington State Department of Transportation or the Federal Highway Administration to be pertinent to ascertain compliance with such Regulations, orders and instructions.

Where any information required of a contractor is in the exclusive possession of another who fails or refuses to furnish this information, the contractor shall so certify to the City, the Washington State Department of Transportation, or the Federal Highway Administration as appropriate, and shall set forth what efforts it has made to obtain the information.

5. Sanctions for Noncompliance

In the event of the contractor's noncompliance with the nondiscrimination provisions of this contract, the City shall impose such contract sanctions as it, the Washington State Department of Transportation or the Federal Highway Administration may determine to be appropriate, including, but not limited to:

1. Withholding of payments to the contractor under the contract until the contractor complies, and/or;
2. Cancellation, termination, or suspension of the contract, in whole or in part.

6. Incorporation of Provisions

The contractor shall include the provisions of paragraphs (1) through (5) in every subcontract, including procurement of materials and leases of equipment, unless exempt by the Regulations, or directives issued pursuant thereto. The contractor shall take such action with respect to any subcontractor or procurement as the City of Hattiesburg, Mississippi Department of Transportation or the Federal Highway Administration may direct as a means of enforcing such provisions including sanctions for noncompliance.

Provided, however, that in the event a contractor becomes involved in, or is threatened with, litigation with a subcontractor or supplier as a result of such direction, the contractor may request the City enter into such litigation to protect its interests and, in addition, the contractor may request MDOT or the United States to enter into such litigation to protect the interests of the United States

Appendix 2

Granting Clause and Habendum Clause

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

GRANTING CLAUSE

NOW, THEREFORE, the City of Hattiesburg, as authorized by law, and upon the condition that the City will accept title to the lands and maintain the project constructed thereon, in accordance with Title 23, United States Code, the Regulations for the Administration of Federal Aid for Highways and the policies and procedures prescribed by the Federal Highway Administration of the Department of Transportation and, also in accordance with and in compliance with all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, part 21, Nondiscrimination in federally assisted programs of the Department of Transportation (hereinafter referred to as the Regulations) pertaining to and effectuating the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252: 42 USC 2000d to 2000d—4) does hereby remise, release, quitclaim, and convey unto the City of Hattiesburg all the right, title, and interest of the Department of Transportation in and to said land described in Exhibit A attached hereto and made a part thereof.

HABENDUM CLAUSE

TO HAVE AND TO HOLD said lands and interests therein unto the City of Hattiesburg, 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 the federal financial assistance is extended or for another purpose involving the provision of similar services or benefits and shall be binding on the state of Mississippi, its successors, and assigns.

The City of Hattiesburg, in consideration of the conveyance of said lands and interests in lands, does hereby covenant and agree as a covenant running with the land for itself, its successors and assigns, that (1) no person shall on the grounds of race, color, sex, disability, national origin, age, or religion, 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 Hattiesburg, shall use the lands and interests in lands so conveyed, in

compliance with all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, part 21, Nondiscrimination of federally assisted programs of the Department of Transportation — Effectuation of Title VI of the Civil Rights Act of 1964, and as said Regulations may be amended (,) and (3) that in the event of breach of any of the above mentioned nondiscrimination conditions, the department shall have a right to reenter said lands and facilities on said land, and the above described land and facilities shall thereon revert to and vest in and become the absolute property of the City of Hattiesburg and its assigns as such interest existed prior to this instruction.¹

Appendix 3

Deeds, License, Leases and Permit Clause

The following clauses shall be included in all deeds, licenses, leases, permits, or similar instruments entered into by the City of Hattiesburg pursuant to the provisions of Assurance 7.

The LESSEE, for himself or herself, his or her heirs, personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree as a covenant running with the land that in the event facilities are constructed, maintained, or otherwise operated on the said property described in this lease, for a purpose for which a City of Hattiesburg program or activity is extended or for another purpose involving the provision of similar services or benefits, the LESSEE shall maintain and operate such facilities and services in compliance with all other requirements imposed pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, part 21, Nondiscrimination in federally assisted programs of the Department of Transportation — Effectuation of Title VI of the Civil Rights Act of 1964, as said Regulations may be amended.

That in the event of breach of any of the above nondiscrimination covenants, the City shall have the right to terminate the lease, and to reenter and repossess said land and the facilities thereon, and hold the same as if said lease had never been made or issued.



LEP Plan

*City of Hattiesburg, Limited English Proficiency Plan
Title VI of the Civil Rights Act of 1964*

Department of Federal and State Programs
In partnership with the
Hattiesburg-Petal-Forrest-Lamar Metropolitan Planning Organization
Mississippi Department of Transportation

July 2017

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INTRODUCTION

On August 11, 2000, President William J. Clinton signed an executive order, Executive Order 13166: Improving Access to Service for Persons with Limited English Proficiency, to clarify Title VI of the Civil Rights Act of 1964. It had as its purpose, to ensure accessibility to programs and services to otherwise eligible persons who are not proficient in the English language.

This executive order stated that individuals who do not speak English well and who have a limited ability to read, write and speak, or understand English are entitled to language assistance under Title VI of the Civil Rights Act of 1964 with respect to a particular type of service, benefit, or encounter. These individuals are referred to as being limited in their ability to speak, read, write, or understand English, hence the designation, "LEP," or Limited English Proficient. The Executive Order states that:

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

Not only do all federal agencies have to develop LEP plans as a condition of receiving federal financial assistance, recipients have to comply with Title VI and LEP guidelines of the federal agency from which funds are provided as well.

Federal financial assistance includes grants, training, use of equipment, donations of surplus property, and other assistance. Recipients of federal funds range from state and local agencies, to nonprofits and organizations. Title VI covers a recipient's entire program or activity. This means all parts of a recipient's operations are covered, even if only one part of a recipient's organization receives the federal assistance. Simply put, any organization that receives federal financial assistance is required to follow this Executive Order.

The City of Hattiesburg receives funds from the US Department of Transportation via the Federal Highway Administration and Federal Transit Administration.

The U.S. Department of Transportation published Policy Guidance Concerning Recipients responsibilities to Limited English Proficient Person in the December 14th, 2005 Federal Register.

This guidance applies to all DOT funding recipients, which include state departments of transportation, state motor vehicle administrations, airport operators, metropolitan planning organizations, and regional, state, and local transit operators, among many others. Coverage extends to a recipient's entire

program or activity, i.e., to all parts of a recipient's operations. This is true even if only one part of the recipient receives the Federal assistance.

Elements of an Effective LEP Policy

The US Department of Justice, Civil Rights Division has developed a set of elements that may be helpful in designing and LEP policy or plan. These elements include:

1. Identifying LEP persons who need language assistance
2. Identifying ways in which language assistance will be provided
3. Training Staff
4. Providing notice to LEP persons
5. The recommended method of evaluating accessibility to available transportation services is the Four-Factor Analysis identified by the US DOT.

These recommended plan elements have been incorporated into this plan.

Methodology for Assessing Needs for an Effective LEP Policy

The DOT guidance outlines four factors recipients should apply to the various kinds of contacts they have with the public to assess language needs and decide what reasonable steps they should take to ensure meaningful access for LEP persons:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the recipient or grantee.
2. The frequency with which LEP individuals come in contact with the program.
3. The nature and importance of the program, activity, or service provided by the recipient to the LEP Community.
4. The resources available to the City of Hattiesburg.

The greater the number or proportion of eligible LEP persons; the greater the frequency with which they have contact with a program, activity, or service and the greater the importance of that program, activity, or service, the more likely enhanced language services will be needed. The intent of DOT's guidance is to suggest a balance that ensures meaningful access by LEP persons to critical services while not imposing undue burdens on small organizations and local governments.

The DOT guidance is modeled after the Department of Justice's guidance and requires recipients and sub recipients to take steps to ensure meaningful access their programs and activities to LEP persons. More information for recipients and sub recipients can be found at <http://www.lep.gov>.

The Four-Factor Analysis

This plan uses the recommended four-factor analysis of an individualized assessment considering the four factors outlined above. Each of the following factors is examined to determine the level and extent of language assistance measures required to sufficiently ensure meaningful access to City of Hattiesburg's services and activities that may affect their quality of life. Recommendations are then based on the results of the analysis.

Factor 1:

The Proportion, Numbers and Distribution of LEP Persons

The Census Bureau has a range of four classifications of how well people speak English. The classifications are 'very well', 'not well', 'well', and 'not at all'. For our planning purposes, we are considering people that speak English less than 'very well' as Limited English Proficient persons. As seen in Table #1 (below), the U.S. Census American Community Survey Selected Population Tables (2015 American Fact Finder 2). Data for City of Hattiesburg shows that 2,417 (5.6%) individuals speak a language other than English; of those individuals, 1,255 (2.9%) individuals have identified themselves as speaking English less than 'very well.' Data for West Hattiesburg shows that 188 (3.1%) individuals speak a language other than English; of those individuals, 74 (1.2%) have identified themselves as speaking English less than 'very well'.

Table 1
City of Hattiesburg

LANGUAGE SPOKEN AT HOME	# Individuals	Percent
Population 5 years and over	43,451	43,451
English only	41,034	94.4%
Language other than English	2,417	5.6%
Speak English less than "very well"	1,255	2.9%
Spanish	1,305	3.0%
Speak English less than "very well"	791	1.8%
Other Indo-European languages	509	1.2%
Speak English less than "very well"	139	0.3%
Asian and Pacific Islander languages	505	1.2%
Speak English less than "very well"	278	0.6%
Other languages	98	0.2%
Speak English less than "very well"	47	0.1%

West Hattiesburg

LANGUAGE SPOKEN AT HOME	# Individuals	Percent
Population 5 years and over	6,037	6,037
Language other than English	188	3.10%
Speak English less than "very well"	123	2.00%
Spanish	79	1.30%
Speak English less than "very well"	74	1.20%
Other Indo-European languages	43	0.70%
Speak English less than "very well"	0	0.00%
Asian and Pacific Islander languages	66	1.10%
Speak English less than "very well"	49	0.80%
Other languages	0	0.00%
Speak English less than "very well"	0	0.00%

Factor 2:

Frequency of Contact with LEP Individuals

With the City of Hattiesburg's LEP population less than 5% and 1,000 individuals the frequency of contact is definitely at a minimum. Because the City of Hattiesburg does not have large population LEP services are provided on minimal level and as needed basis due to the unpredictable and infrequent request for services. The City reaches out to the LEP population by providing information in English and Spanish in public areas, such as transit and public facilities, including but not limited to vehicles, train depot, ticket kiosks, and city offices.

The City of Hattiesburg identifies safety as its most critical service to provide the LEP population. With limited resources available and a population base of less than 1% for those who speak English less than "very well", the city utilizes resources in the community such as the two major universities, to provide translation services.

The city has partnered with additional agencies such as the Mississippi Department of Transportation, to assist with providing materials and information to disseminate during major incidents or activities.

Factor 3:

The Nature and Importance of the Program, Activity, or Service to LEP

The City of Hattiesburg being a small urban area in the area of finances, the city utilizes outside resources and organizations to assist in providing information for the LEP population. The LEP community is involved in city functions such as church, school, transit, shopping and other activities, and the COH is focused on

helping the LEP population with daily functions. The City plans utilization of additional resources such the internet, television, radio and Spanish speaking church congregations to disseminate pertinent information. In addition, the city's Department of Human Resources and Hattiesburg Police Department and Department of Federal and State Programs have listing of employees who are able to assist with translation and interpretation services.

Factor 4:

The Resources Available to the City of Hattiesburg and Overall Cost

U.S. Department of Transportation Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons published in the Federal Register: December 14, 2005 (Volume 70, Number 239) states:

"A recipient's level of resources and the costs imposed may have an impact on the nature of the steps it should take in providing meaningful access for LEP persons. Smaller recipients with more limited budgets are not expected to provide the same level of language services as larger recipients with larger budgets. In addition, "reasonable steps" may cease to be reasonable where the costs imposed substantially exceed the benefits. Recipients should carefully explore the most cost-effective means of delivering competent and accurate language services before limiting services due to resource concerns. "

Based on this guidance, we have reviewed our resources and deemed that given the low concentration of LEP individuals in our city, upon request we will translate our vital documents into the language requested to ensure accessibility. Although there will not be a fixed amount allocated from our yearly budget for the translation of documents, the cost associated with the necessary translation of document in order to comply with LEP requirements will be allocated on an as-needed basis.

The City of Hattiesburg will, on a continuing basis, identify documents that are routinely provided to the citizens of Hattiesburg that will be translated into languages other than English as well as ensure meaningful access to all programs, activities and/or benefits for LEP persons.

Safe Harbor Stipulation

Federal law provides a "Safe Harbor" situation so that recipients can ensure with greater certainty that they comply with their obligation to provide written translations in languages other than English. A "safe harbor" means that if a recipient provides written translation in certain circumstances, such action will be considered strong evidence of compliance with the recipient's written-translation obligations under Title VI.

The failure to provide written translations under the circumstances does not

mean there is noncompliance, but rather provides a guide for recipients that would like greater certainty of compliance than can be provided by a fact-intensive, four factor analysis. For example, even if a safe harbor is not used, if written translation of a certain document(s) would be so burdensome as to defeat the legitimate objectives of its program, it is not necessary.

Other ways of providing meaningful access, such as effective oral interpretation of certain vital documents, might be acceptable under such circumstances. Strong evidence of compliance with the recipient's written translation obligations under "safe harbor" includes providing written translations of vital documents for each eligible LEP language group that constitutes 5% or 1,000, whichever is less, of the population of persons eligible to be served or likely to be affected or encountered. Translation of other documents, if needed, can be provided orally.

This "Safe Harbor" provision applies to the translation of written documents only. It does not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable. Given the low concentration of LEP individuals (as seen in Table #1) we have deemed that the City of Hattiesburg will provide written translations of all vital documents upon request. Vital documents will include, but not be limited to: the complaint form, complaint procedures, and all public meeting notices.

Providing Notice to LEP Persons

U.S. DOT LEP guidance says:

Once an agency has decided, based on the four factors, that it will provide language service, it is important that the recipient notify LEP persons of services available free of charge. Recipients should provide this notice in languages LEP persons would understand. The guidance provides several examples of notification including:

1. Signage in languages that an LEP would understand when free language assistance is available with advance notice.
2. Stating in outreach documents that free language services are available from the agency.
3. Working with community-based organization and other stakeholders to inform LEP individuals of the recipient's services, including the availability of language assistance services. Statements in languages that an LEP individual would understand will be placed in public information and public notices that persons requiring language assistance or special accommodations will be provided the requested assistance at no cost, with reasonable advance notice to the City of Hattiesburg.

LANGUAGE ASSISTANCE PLAN

Considering the relatively small scale of the City of Hattiesburg, the small concentration of LEP individuals in the service area, and the City's financial resources; it necessary to limit language aid to the most basic and cost-effective services. Other than the previously mentioned vital documents, if there is additional language assistance measures required for LEP individuals, the City shall proceed with oral interpretation options to meet all requests for those language groups to ensure equal access while also complying with LEP regulations.

- With advance notice of seven calendar days, the City will provide interpreter services at public meetings, including language translation and signage for the hearing impaired.
- The City will utilize the Translators Resource List as provided by the LEP Liaison of the City of Hattiesburg for translation services and verbal interpretation.
- Ensure placement of statements in notices and publications in languages other than English that interpreter services are available for public meetings.
- The Census Bureau "I-speak" Language Identification Card will be distributed to all employees that may potentially encounter LEP individuals.
- Once the LEP individual's language has been identified, an agency from the Translator's Resource List will be contacted to provide interpretation services.
- Publications of the city's complaint form available at public meetings.

LEP Services

The LEP Liaison will identify and maintain an inventory of Language Assistance Services (LAS) providers available to all City personnel.

- Contract language service providers (LSP). All LAS will be made available to LEP persons at the expense of the City, where the circumstances indicate the provision of LEP services is appropriate and required.

Training

The City of Hattiesburg, Hub City Transit and sub-recipients should know their obligations to provide meaningful access to information and services for LEP persons, and all persons in public contact positions should be properly trained. An effective training objective would likely include training to ensure Hub City Transit operations and their sub recipients:

- Hub City Transit and sub-recipients know about LEP policies and procedures.
- Hub City Transit and sub-recipients who have contact with the public (or

those in a recipient's custody) are trained to utilize interpreter services effectively.

- Hub City Transit and sub-recipients shall include this training as part of the orientation provided for new employees.

Management staff, even if they do not interact regularly with LEP persons, should be fully aware of and understand the plan so they can reinforce its importance and ensure its implementation by staff. Training will be arranged by the Department of Federal and State Programs

LEP Accommodations

The LEP Liaison and management will, on a continuing basis, identify vital documents that are routinely provided to stakeholders that will be translated into languages other than English. The translation of vital documents into languages other than English is particularly important where a significant number or percentage of the customers served and/or eligible to be served have limited English proficiency. Whether or not a document is vital depends on how significant the impact on the health, safety, legal rights, or livelihood of an LEP person may be. Written documents include electronic documents and web-sites. Vital documents may include materials such as:

- Emergency transportation information;
- Notices of public hearings and proposed transportation plans;
- Community education materials;
- Notices notifying LEP persons of language assistance at no cost to the LEP person;
- Markings, signs and packaging for hazardous materials and substances;
- Signs in waiting rooms, reception areas, and other initial points of entry;
- Instructions on how to participate in a recipient's program.

The LEP Liaison will coordinate with the LSP to have identified documents translated accordingly. Translated documents will be made available as requested.

COMPLAINT PROCEDURE

a. Any LEP individual has a Right to File a Complaint against the city where he or she believes that the city did not provide necessary LEP services as appropriate. These complaints include those available under Title VI of the Civil rights Act of 1964.

b. All complaints, alleging a violation under Title VI will be referred to the Title VI Coordinator or the City Attorney.

c. The Title VI Coordinator and the City Attorney will take appropriate steps to resolve all complaints in accordance with the agency's discrimination complaint procedures.

d. The Title VI Liaison will maintain a database tracking requests for all complaints and their resolution. The Complaint Resolution Form will be completed and served to the aggrieved resident. A database will include the following items:

1. Source of complaint
2. LEP request including relevant contact information
3. Nature of complaint request
4. Date complaint/request received
5. Date complaint/request resolved
6. Manner of resolution
7. Comments

e. Fact-finding procedures by Title VI Liaison and City Attorney will follow the investigation protocol in the Title VI Plan.

f. Mediation and Hearings

g. Interpreters will be made available to hearing participants upon request or where CRD staff identifies a need for an interpreter.

OFFICE

1. Provide an I-speak language identification card to determine the language spoken of the LEP individual.
2. Once the foreign language is determined, provide information to Title VI coordinator who will contact an interpreter from the Translators Resource List.
3. If the need is for a document to be translated, the Title VI Coordinator will have the document translated and provided to the requestor as soon as possible.

ROAD

1. Road crew employee will immediately contact the Title VI Coordinator for assistance, and provide an I-speak language identification card to the LEP individual to determine the language spoken of the individual.
2. Once the foreign language is determined, provide information to Title VI Coordinator who will contact an interpreter from the Translators Resource List to provide telephonic interpretation.
3. If the need is for a document to be translated, the Title VI Coordinator will have the document translated and provided to the requestor as soon as possible.

IN WRITING

1. Once a letter has been received it will be immediately forwarded to the Title VI Coordinator.
2. The Title VI Coordinator will contact a translator from the Translators Resource List

to determine the specifics of the letter request information.

3. The Title VI Coordinator will work with the selected agency to provide the requested service to the individual in a timely manner.

OVER THE PHONE

1. If someone calls into our office speaking another language every attempt will be made to keep that individual on the line until an interpreter can be conference into the line and if possible determine the language spoken of the caller.

2. Once the language spoken by the caller has been identified we will proceed with providing the requested assistance to the LEP individual.

LEP Plan Access

A copy of the LEP plan document can be requested at the City of Hattiesburg Department of Federal and State Programs, HPFL-MPO Division. The City of Hattiesburg will also post the LEP Plan on a bulletin board at the Hattiesburg's City Hall and make the plan available on the City of Hattiesburg website www.hattiesburgms.com.

Any person or agency may also request a copy by contacting:

HPFL-MPO Division Manager City of Hattiesburg

Federal and State Programs

P.O. Box 1898

Hattiesburg, MS 39403-1898

601-545-6259

601-545-6327 fax



TITLE VI -- PUBLIC COMMENT FORM

Date:

Topic/Meeting:

Name: (optional)

Phone #

Mailing Address: (for written

Comments:



Title VI Complaint Form
Forma Compatible Con Título 6

Section 1: Sección 1			
Name Nombre:			
Address: Dirección:			
Telephone: <u>El Teléfono</u> (Home): Domicilio		Telephone: <u>el Teléfono</u> (Work): Empleo	
Electronic Mail Address: Dirección de correo electrónico			
Accessible Format Requirements? Requisitos de formato accesible	Large Print Letra grande		Audio Tape Cinta de audio
	Other otro(a)		Other otro(a)
Section 2: Sección 2:			
Are you filing this complaint on your own behalf? ¿Usted está <u>presentando</u> esta <u>queja</u> en su nombre?		* Yes	No
*If you answered "yes" to this question, go to Section 3 Si usted contestó "sí" a esta <u>pregunta</u> , <u>vaya</u> a la <u>Sección</u>			
IF not, please supply the name and relationship of the person for whom you are complaining: Si no, por favor suministre el nombre y la relación de la persona para quien se <u>queja</u> :			
Name Nombre:		Relationship <u>La Relación</u>	
Please explain why you have filed for a third party: Explique por qué ha <u>presentado</u> por un <u>tercero</u> :			
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party. Por favor confirme que ha obtenido el permiso de la <u>parte</u> <u>agraviada</u> si <u>radicara</u> en nombre de un <u>tercero</u> .		* Yes	No
Section 3 Sección 3			
I believe the discrimination I experience was based on (check all that apply): Yo creo que la <u>discriminación</u> que <u>experimento</u> se basó en (marque todas las que apliquen):			
<input type="checkbox"/> Race Raza	<input type="checkbox"/> Color Color	<input type="checkbox"/> National Origin origen nacional	
Date Of Alleged Discrimination (Month, Day, Year) : Fecha de la <u>supuesta</u> <u>discriminación</u> (mes, día, año)			
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all person(s) who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form. Explicar lo más claramente posible lo que <u>ocurrió</u> y por qué usted cree que son objeto de <u>discriminación</u> . Describir todos(s) <u>persona(s)</u> que han participado. Incluir el nombre y la información de contacto de la(s) <u>persona(s)</u> que <u>discrimina</u> contra usted (si se conoce) así como los nombres y la información de contacto de los testigos. Si se necesita más espacio, utilice la parte de atrás de este formulario.			
<hr/> <hr/> <hr/>			

Section 4 Sección 4:		
Have you previously filed a Title VI complaint with this agency? <i>¿Ha archivado antes un Título VI queja con esta agencia?</i>	Yes	No
Section 5 Sección 5:		
Have you filed this complaint with any other Federal, State or local agency, or with any Federal or State Court? <i>¿Ha presentado esta queja con cualquier otra Ley Federal, Estatal o local, o con cualquier Tribunal Federal o Estatal?</i>		
<input type="checkbox"/> Yes <input type="checkbox"/> No		
If yes, check all that apply: <i>Si la respuesta es sí, marque todo lo que aplique</i>		
<input type="checkbox"/> Federal Agency: <i>Agencia Federal</i> _____		
<input type="checkbox"/> Federal Court: <i>Tribunal Federal</i> _____		
<input type="checkbox"/> State Court: <i>Tribunal del Estado</i> _____		
<input type="checkbox"/> State Agency: <i>Agencia Estatal</i> _____		
<input type="checkbox"/> Local Agency: <i>Agencia Local</i> _____		
Please provide information about a contact person at the agency/court where the complaint was filed. <i>Sírvanse proporcionar información sobre una persona de contacto en la Agencia/corte donde se presentó la queja.</i>		
Name: <i>Nombre:</i> _____		
Title: <i>El Título</i> _____		
Agency: <i>La Agencia</i> _____		
Address: <i>La Dirección</i> _____		
Telephone: <i>El Teléfono</i> _____		
Section 6 Sección 6:		
Name of Agency complaint is Against : <i>Nombre de denuncia de la agencia es contra:</i> _____		
Contact person: <i>Persona de contacto</i> _____		
Title: <i>El Título</i> _____		
Telephone: <i>El Teléfono</i> _____		

Signature: _____ **Date:** _____
La Firma *La Fecha*

Please submit this form in person at the address below, or mail this form to: City of
 Hattiesburg, Title VI Coordinator
 Federal and State Programs
 P.O. Box 1898
 Hattiesburg, MS 39403-1898