

Title VI Plan for CDOT FTA Sub-recipient

City of Glenwood Springs, dba Ride Glenwood Springs

12-14-2015

I. Non-Discrimination Policy Statement

It is the policy of the City of Glenwood Springs that no person shall on the grounds of race, color, national origin, sex, disability, or age, be excluded from participation in, be denied the benefits of, or be subjected to discrimination in any operation of the City of Glenwood Springs as provided by Title VI of the Civil Rights Act of 1964 and related statutes.

This policy applies to all operations of the City of Glenwood Springs, including its contractors and anyone who acts on behalf of the City of Glenwood Springs. This policy also applies to the operations of any department or agency to which the City of Glenwood Springs extends federal financial assistance. Federal financial assistance includes grants, training, use of equipment, donations of surplus property, and other assistance.

Prohibited discrimination may be intentional or unintentional. Seemingly neutral acts that have disparate impacts on individuals of a protected group and lack a substantial legitimate justification are a form of prohibited discrimination. Harassment and retaliation are also prohibited forms of discrimination.

Examples of prohibited types of discrimination based on race, color, national origin, sex, disability, or age include: Denial to an individual any service, financial aid, or other benefit; Distinctions in the quality, quantity, or manner in which a benefit is provided; Segregation or separate treatment; Restriction in the enjoyment of any advantages, privileges, or other benefits provided; Discrimination in any activities related to highway and infrastructure or facility built or repaired; and Discrimination in employment.

Title VI compliance is a condition of receipt of federal funds. The Title VI Coordinator is authorized to ensure compliance with this policy, Title VI of the Civil Rights Act of 1964, 42 U.S.C § 2000d and related statutes, and the requirements of 23 Code of Federal Regulation (CFR) pt. 200 and 49 CFR pt. 21.

Andrew Gorgey, Interim City Manager
12-14-2015

II. Organization, Staffing, and Structure

The Glenwood Springs City Manager is ultimately responsible for assuring full compliance with the provisions of Title VI of the Civil Rights Act of 1964 and related statutes and has directed that non-discrimination is required of all agency employees, contractors, and agents pursuant to 23 CFR Part 200 and 49 CFR Part 21.

The City of Glenwood Springs has created the position of Transportation Manager to assist with the duties of the Agency Title VI Coordinator and ensure implementation of agency's Title VI program. The position of Transportation Manager is located within the Engineering Division of the Public Works Department.

The Title VI Coordinator is responsible for:

- Submitting a Title VI plan and annual reports on the agency's behalf;
- Developing procedures for the prompt processing and disposition of complaints;
- Investigating complaints, compiling a complaint log, and reporting to CDOT.
- Developing procedures for the collection and analysis of statistical data.
- Developing a program to conduct Title VI reviews of program areas;
- Conducting annual Title VI assessments of pertinent program areas;
- Developing Title VI information for dissemination;
- Establishing procedures for resolving deficiency status and reducing to writing the remedial action agreed to be necessary.

III. Primary Program Area Descriptions & Review Procedures

The Transportation Division engages in the following program areas:

Program Area	General Description	Title VI/Non-Discrimination Concerns and Responsibilities	Review Procedures for Ensuring Non-Discrimination
<i>Public Transit</i>	Ride Glenwood Springs City public transit system	Ensure non-discrimination in applying service area equity to all City neighborhoods	Daily, weekly, and monthly review of bus ridership information

IV. Title VI Complaint Procedures

Discrimination Complaint Procedure for the City of Glenwood Springs

Federal law prohibits discrimination on the basis of race, color, national origin, age, sex, or disability in any City of Glenwood Springs program or activity. This prohibition applies to all branches of the City of Glenwood Springs, its contractors, consultants, and anyone else who acts on behalf of the City of Glenwood Springs.

Federal law requires that the City of Glenwood Springs investigate, track, and report discrimination complaints. Complaints must be filed in writing and will be investigated within sixty days of submission. If you need assistance to file your complaint or need interpretation services, please contact the City of Glenwood Springs City Manager.

Who is eligible to file a complaint?

Anyone who believes they have been excluded from participation in, denied the benefits of, or otherwise subjected to discrimination under any City of Glenwood Springs program or activity because of their race, color, national origin, age, sex, or disability may file a complaint.

Discrimination includes lack of access, harassment, retaliation and disparate impacts from a program or activity. Harassment includes a wide range of abusive and humiliating verbal or physical behaviors. Retaliation includes intimidating, threatening, coercing, or engaging in other discriminatory conduct against anyone because they filed a complaint or otherwise participated a discrimination investigation.

How do you file a complaint?

Complaints must be filed in writing within 180 days from the last date of the alleged discrimination. However, contact the City Manager if you believe your complaint may fall outside this deadline.

Reasonable efforts will be made to assist persons with disabilities, non-English speakers, and others unable to file a written complaint. For assistance in filing a complaint, please contact the City Manager. Complaints may be submitted via mail, email, fax or in person to:

City Manager, Title VI Coordinator
City of Glenwood Springs
101 West 8th Street
Glenwood Springs, CO 81601
970-384-6400 (phone)
970-384-6599 (fax)
Andrew.gorgey@cogs.us

Complaints may also be filed directly with the following agencies:

Colorado Department of Transportation
Civil Rights & Business Resource Center
4201 East Arkansas Ave., Room 150
Denver, CO 80222
dot_civilrights@state.co.us
Phone: (800) 925-3427
Fax: (303) 952-7088
dot_civilrights@state.co.us

Federal Highway Administration, Colorado Division
12300 West Dakota Avenue, Suite 180
Lakewood, Colorado 80228
Phone: (720) 963-3000
Fax: (720) 963-3001

What happens after a complaint is filed?

Title VI complaints must be investigated within sixty days. Investigating a complaint includes interviewing all parties involved and key witnesses. The investigator may also request relevant information such as books, records, electronic information, and other sources of information from all involved parties. You may specify if there is a particular individual or individuals that you feel should not investigate your complaint due to conflict of interest or other reasons.

In some cases, complaints will be forwarded to either the Colorado Department of Transportation or the Federal Highway Administration for investigation. If your complaint is forwarded to one of these agencies, you will be provided the name and contact information of the employee handling your complaint.

Federal law prohibits retaliation against individuals because they have filed a discrimination complaint or otherwise participated in a discrimination investigation. Any alleged retaliation should be reported in writing to the investigator.

Where did the discrimination occur?

Dates and times discrimination occurred?

Were there any other witnesses to the discrimination?

Name	Organization/Title	Work Telephone	Home Telephone

How would you like to see this situation resolved?

Have you filed your complaint, grievance, or lawsuit with any other agency or court?

Who _____ When _____
Status (pending, resolved, etc.) _____ Result, if known _____
Complaint number, if known _____

Do you have an attorney in this matter?

Name _____ Phone _____
Address _____ City _____ Zip _____

Signed _____ Date _____

VI. Data Collection

Program Area	Type of Data Collected & Process for Collecting	Intended Outcome of Data Analysis (i.e. Title VI Purpose for Collecting the Data)
Public Transit	Ridership info is collected daily, by each bus stop	Title VI purpose for collecting data
Public Transit	US Census data reviewed annually	Title VI purpose for collecting data
Public Transit	Public Meeting Attendance demographic information	Title VI Purpose for collecting data

VII. Public Participation

For conducting comprehensive and all-inclusive public outreach, the City of Glenwood Springs identifies minority populations through the use of local demographic data gathered through on-board bus surveys and customer outreach; US Census data reviewed annually; the use of community liaisons available with local public and private schools, places of worship, and employment centers; and local non-English media like radio stations and newspapers.

To communicate with and conduct outreach to Limited English Proficiency individuals and minority populations, the City of Glenwood Springs utilizes its official website with translation services available; publishes occasional newsletters and press releases with available translation services; uses local business owners with various language skills and minority customer bases; broadcast media such as local Spanish language radio stations and newspapers; and employs several multi-lingual individuals available to help with in-person translating services.

The City of Glenwood Springs places special emphasis on considering input from minority populations and Limited English Proficiency persons in its decision-making processes related to providing public services. Through the use of the methods outlined above, City staff incorporates all input from all people regardless of language spoken into all official City planning efforts and service provision. Public services, at a minimum, are provided in both English and Spanish, and if necessary can be provided in other languages by engaging multiple local residents and business owners or online translation services to remain all-inclusive and available to all persons.

VIII. Notice of Rights

Your Rights against Discrimination under Title VI of the Civil Rights Act of 1964

The City of Glenwood Springs operates its programs and services without regard to race, color, national origin, sex, age, and disability. Anyone who believes they have been excluded from participation in, denied the benefits of, or otherwise subjected to discrimination under any City of Glenwood Springs program or activity because of their race, color, national origin, age, sex, or disability may file a discrimination complaint with the City of Glenwood Springs or the Colorado Department of Transportation.

To file a Title VI discrimination complaint, contact:

City Manager, Title VI Coordinator
City of Glenwood Springs
101 West 8th Street
Glenwood Springs, CO 81601
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4201 East Arkansas Avenue, Room 150
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