

RESOLUTION NO. 2562

Resolution Adopting a Title VI Plan for the City of Alexandria

WHEREAS, the City of Alexandria is a subrecipient of Federal Transit Administration (FTA) funds from both the Northern Virginia Transportation Commission and the Metropolitan Washington Council of Governments;

WHEREAS, any recipient or subrecipient of FTA funds must provide information which quantifies how the recipient and its subrecipients are complying with Title VI of the Civil Rights Act of 1964;

WHEREAS, the FTA has promulgated a new set of regulations that clarifies the requirements which must be met to demonstrate compliance with Title VI of the Civil Rights Act of 1964;

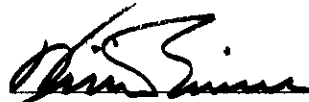
WHEREAS, City staff have reviewed these requirements, and have prepared a plan that indicates the City's compliance with Title VI of the Civil Rights Act.

NOW, THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF ALEXANDRIA, VIRGINIA

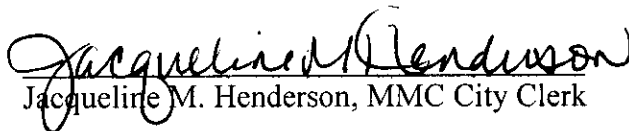
That the City Council of Alexandria, Virginia:

Adopt the attached plan for Title VI compliance and transmit it to the Northern Virginia Transportation Commission and Metropolitan Washington Council of Governments for submission to the Federal Transit Administration.

Adopted: May 28, 2013


WILLIAM D. EUILLE MAYOR

ATTEST:


Jacqueline M. Henderson, MMC City Clerk

The City of Alexandria's Title VI Program

The City of Alexandria (the "City") is an independent City in the Commonwealth of Virginia which was founded in 1749. The City receives Federal Transit Administration ("FTA") funds as a subrecipient of both the Northern Virginia Transportation Commission ("NVTC") and of the Metropolitan Washington Council of Governments ("MWCOG"). The FTA funded transit projects performed by the City are either studies, or provide facilities for the Washington Metropolitan Area Transit Authority ("WMATA"), which, in its role as a direct recipient of FTA funds, produces its own Title VI report.

The City has established a Title VI Program to comply with the US Department of Transportation ("DOT") Title VI regulations (49 CFR part 21) and to integrate into their programs and activities considerations expressed in the DOT Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficiency ("LEP") Persons (70 FR 74087, December 14, 2005).

On October 1, 2012, FTA issued Circular 4702.1B which supersedes Circular 4702.1A and now requires subrecipients to have their own Title VI program. The Title VI program shall follow all the requirements of Chapter III-3 of the Circular and must be approved by the subrecipient's board of directors or appropriate governing entity or official(s) responsible for policy decisions. Subrecipients shall submit Title VI Programs to the primary recipient from whom they receive funding in order to assist the primary recipient in its compliance efforts.

1.0 Annual Assurance to MWCOG/NVTC that the City of Alexandria is Complying with Title VI of the Civil Rights Act of 1964

Assurance of Compliance

It is the policy of the City of Alexandria not to discriminate against any employee because of race, color, religion, age, sex, national origin, ancestry, or disability.

Title VI Assurance

In accordance with 49 CFR Section 21.7, every application for financial assistance from the Federal Transit Administration (FTA) must be accompanied by an assurance that the applicant will carry out the program in compliance with Title VI of the Civil Rights Act of 1964. The City of Alexandria will fulfill this requirement by submitting the annual assurance to NVTC prior to receiving FTA funds. The City of Alexandria provides this assurance in consideration of and for the purpose of obtaining FTA grants, loans, contracts, property, discounts or other FTA financial assistance.

The City has signed the certifications and assurance document required by FTA and has forwarded it to NVTC as required by the subrecipient agreement signed between the parties.

2.0 Notice to the Public Regarding Title VI Obligations

The City of Alexandria has chosen to adopt the MWCOG notice, which has been changed to accommodate the City's information. It is included in Appendix A.

The notice states in English and Spanish that the City operates its programs without regard to race, color, and national origin. It informs the public how to request additional information on the City of Alexandria's Title VI obligations. It directs the public to a copy of the City's procedures for filing, receiving, and tracking complaints. The notice also includes the Title VI complaint form. See Appendix B. The City is currently translating the notice form into Spanish. The notice states further that the City will translate it into other languages on request.

This notice will be posted in or proximate to large facilities having many transit patrons, such as the City Hall, all of the City's libraries, and such major transit facilities as the King St-Old Town Metrorail station, and on the City's web site.

3.0 Investigations of Alleged Discrimination

The City of Alexandria has a staffed Office of Human Rights which investigates any allegations of discrimination by the City. The City of Alexandria will record any Title VI investigations, complaints, or lawsuits. This list shall include the date of the investigation, lawsuit, or complaint filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by the City of Alexandria in response to the investigation, lawsuit, or complaint. The City will employ the complaint form attached in Appendix B to catalogue any complaints received by the Office of Human Rights. The City is currently translating this complaint form into Spanish.

4.0 Title VI Investigations, Complaints, and Lawsuits

The City of Alexandria has had no Title VI complaints since its last submittal in 2010. No Title VI complaints had been filed prior to 2010.

5.0 Public Participation Plan

The City of Alexandria believes public participation is an integral part of transportation planning and decision making. The City of Alexandria provides access to minority, low-income, and LEP populations on opportunities for public participation in transportation decisions. By providing such access, the City of Alexandria offers an inclusive, representative, and equal opportunity for two-way communication resulting in appropriate action that reflects public involvement. The City of Alexandria's Transportation & Environmental Services Department has and will continue to coordinate with the City of Alexandria's Communications Department and the City of Alexandria's Human Rights Department and other organizations to implement strategies to reach out to members in affected minority, low-income, and LEP communities on proposed transportation decisions.

The City employs a wide variety of means to involve citizens in transportation planning. Examples are the following:

- Public meetings before many groups who have expressed interest in different projects, such as making a presentation about the King Street Access Improvement project before the Alexandria Federation of Civic Federations.
- Holding project-specific public meetings to solicit input. In areas of the City with large populations of LEP people, the city written materials in their native language and makes sure that translators are present at these meetings.
- Holding a series of public meetings on major issues, such as 15 meetings held in determining the feasibility of high-capacity transitways in the City.
- Employing the City's General Web Site and the City's Local Motion Web Site to provide announcements of public meetings and to provide information to the general public about issues which were raised at the meetings.
- Before transportation surveys are administered, making sure that all people affected by the action who may have Limited English Proficiency, have surveys available in their native language. In the past, we have printed transportation surveys in Spanish and Amharic, which is one of the languages of Ethiopia. This will be done by pulling down corridor level demographic information, prior to the survey being administered to ensure that it is in the appropriate language.
- In corridors with a large LEP population, translators will be available at all public meetings and any written materials which will be distributed at the meeting will be available in the second predominant language as well as English.
- Releasing news releases on important meetings which are picked up by the Washington Post and local newspapers.
- Distributing information monthly about transportation issues on the City's Local Motion web site.
- In some cases, distributing paper flyers to the houses and/or businesses in the travel corridors being analyzed.
- Establishing ad hoc committees of citizens and elected officials to assist staff in gauging transportation decisions.
- City Council meetings.
- Web proceedings from City Council meetings.
- Information on the local cable television station.
- Information is distributed through such social media as Twitter and Facebook.

6.0 A Plan for Meaningful Access for Persons with Limited English Proficiency (LEP)

Four Factor Analysis

The City of Alexandria has performed a USDOT Four-Factor analysis of its program to encourage people with Limited English Proficiency (LEP) to become more involved in the process of planning transportation services.

This analysis consists of these four factors:

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 grantee;
2. The frequency with which LEP individuals come into contact with the City of Alexandria's plans, programs, and activities;
3. The nature and importance of the program, activity, or service provided by the City of Alexandria to the LEP population; and
4. The resources available to the City of Alexandria and overall costs to provide LEP assistance.

Factor 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 grantee;

In order to get the total number of LEP people in the City the results of the FY2007-FY2017 American Community Survey conducted by the U.S. Census were used. According to these figures, 70.4% of the population of the City only speak English. Out of the 29.6% who speak other languages, 13.7% of the population speak Spanish or Spanish Creole. Out of this population, 50.2% speak English less than very well. Other Indo-European languages are used by 6.6% of the population, with 24.0% of this group not speaking English very well. Asian and Pacific Islanders represent 3.1% of the population, with 39.9% of them not speaking English well. Finally, there is another sizable group of non-English speakers. These are people speaking other languages, such as Amharic, who constitute 6.6% of the City's population. According to these figures, 39.1% of these people do not speak English well.

The City or its contractor will perform a demographic analysis of the service area impacted by any transit project. As an illustration of this, the City reviewed the U.S. Census for part of the area which will be analyzed as part of the FTA funded Van Dorn Beauregard Alternative Analysis/Environmental Assessment. City staff compared the demography of Zip Code 22311, west of I-395 with the rest of the City by using the American Community Survey (2007-2011 5-year estimate), and found that this area has a higher percentage of Hispanics than the City as a whole. According the U.S. Census, 18.2% of the people in this Zip Code are Hispanics, in contrast to 15.4% in the City as a whole. The demographic analysis also reviewed.

The City also reviewed another piece of data from the American Community Survey and it indicated for those households where English was not spoken at home, respondents answered whether they could speak English less than very well. For those speaking Spanish in the City,

6.7% of people stated that they can speak it less than very well. For those in Zip Code 22311, 7.3% indicated that they can speak English less than very well. In attempting to gauge the LEP population, it was suggested that the level of literacy of the population should be gauged. Doing a cross-tabulation of ability to speak English well and levels of education would have provided the best information. However that information was not obtainable. Comparing low levels education (less than 9th grade education) in Zip Code 22311 with the City as a whole finds them to be almost identical, with 4.6% of people in Zip Code 22311 having low levels of education while in the entire City the number is 4.5%. All of this data does suggest that as the City embarks on the analysis of the Van Dorn-Beauregard corridor, we must fashion various methods to actively solicit the inputs of LEP people. Attached in Appendix C are census tract maps that indicate where the five major languages most spoken at home other than English are located. Attached in Appendix D are maps which indicate the percentage of Black or African American people and the percentage of Hispanics in each census tract in the City.

Factor 2: The frequency with which LEP individuals come into contact with the City of Alexandria's plans, programs, and activities;

The City has provided translation services and appointed representatives of non-English speaking groups to commissions, however it has not documented previously how many LEP individuals actually interface with the City. The City will make an effort to document the number of LEP people who wish to be involved in the transportation planning process and how these people became involved in the process.

Factor 3: The nature and importance of the program, activity, or service provided by the City of Alexandria to the LEP population

The transit programs which are assisted by the City's Department of Transportation and Environmental Services are of critical importance to many in the LEP community. These services oftentimes represent the only means of transportation to members of this community, which enable them to find and keep jobs, and to take advantage of the many benefits provided for citizens of Alexandria. The City will renew its efforts to reach out to this important group in providing transit services and facilities which can improve their travel experience. We will investigate the best means of developing a continuing dialogue with this population.

The City will make an effort to ensure that identify important projects which will affect LEP populations and will increase its efforts to get these people involved in the transportation planning process.

Factor 4: The resources available to the City of Alexandria and overall costs to provide LEP assistance.

The City worked with the United Way to develop a Hispanic Assessment in 1999. This study determined that that City needed to provide better interpretive services to Hispanic persons, to fully provide them with all City services. In response to these findings, the City developed its Language Assistance plan in 2003 and was updated in 2008. This plan, provided in Appendix

E, indicates all of the resources which the City has available to those who have Limited English Proficiency. The City has historically provided an extensive amount of resources for interpretive services. Annually, the City's Language Assistance Coordinator invested up to \$40,000 in language interpretation.

7.0 Analysis of Non-Elected Transportation Boards and Commission Appointed by Alexandria

The City of Alexandria has had three city commissions or advisory groups which deal with transit issues. These are the Transportation Commission, the High Capacity Transit Corridors Working Group, and the Beauregard Rezoning Advisory Group. The following table illustrates the composition of these groups:

Table of the Composition of Transit-Related Citizen Groups

Name of Group	No. of Caucasians	No. of African-Americans	No. of Hispanics	No. of Asians/Pacific Islanders	Total
Transportation Commission	7-8	2-1			9
High Capacity Transit Corridors Working Group	8	1			9
Beauregard Rezoning Advisory Group	9	1	1		11

The Transportation Commission helps our City Council develop transportation policies. The Transportation Commission has one African-American representative, the Mayor of Alexandria. Until recently, the Transportation Commission also had another long-serving African-American member. There are a total of nine people on the Commission, whose members are appointed by other City Commissions and the City Council. Its meetings are widely publicized in various local and city media and we have had considerable representation from audience members from such minority groups as African-Americans.

The second non-elected group dealing with transit issues was the High-Capacity Transit Corridors Work Group. This group held 15 meetings from October 2010 to March 2012 to develop recommendations for high-capacity transitway corridors within the City. While most of the notifications were posted on the internet, one effort involved City staff delivering hard copy notices individually to almost all households within one corridor. The work group was composed of nine individuals, with one person being African-American. The meetings of this

group were widely publicized and many minority group residents participated in the meetings, particularly African-Americans.

The third non-elected group was the Beauregard Rezoning Advisory Group. It was a committee which advised the City Council on a range of issues involving the rezoning of the Beauregard corridor. This group, consisting of eleven individuals, had two minority members, one Hispanic and one African-American. Considerable efforts were made to do community outreach to people with limited English proficiency. Informational materials and meeting notices regarding the overall planning effort were translated into English, Amharic and Spanish. These materials and notices were posted online on the City's website, and hard copies were distributed at public places throughout the Plan area, from libraries and schools (including flyers in student backpacks in cooperation with the Alexandria public school system) as well as popular local retail spaces such as coffee shops, laundromats, and grocery stores. Spanish language interpreters attended every City-sponsored meeting, with headsets provided, to facilitate audience participation and comment. Spanish interpretation was also provided at meetings of the Beauregard Rezoning Advisory Group.

The City will renew its efforts to identify both members of minority groups and people with LEP who will be affected by major City actions. These people will be strongly considered for appointment to the community service boards which provide the City with policy guidance regarding some of these major transportation issues. The City will review the make-up of these boards and ensure that such representation is provided on these Boards, as vacancies become available.

8.0 Requirement to Collect Demographic Data

The City is not a transit service provider, and therefore is not required to collect demographic data. The Alexandria Transit Company is independent of the City and does not accept FTA capital and operating funds. Nevertheless, the City performed the following analysis of **the FTA Funded Projects** in Alexandria. In the next fiscal year, the City of Alexandria will be drawing down funds from most of its FTA grants.

8.1 Crystal City-Potomac Yard Transitway

The City has several grants funding the Crystal City-Potomac Yard Transitway (CCPY) and its stations. The transitway is currently under construction, and should be completed by March, 2014. This project received a documented categorical exclusion from the FTA on March 25, 2011, which contained a section on environmental justice. WMATA conducted a Metrobus Ridership survey of all of its bus routes in 2008. Route 9A, which serves the CCPY Transitway corridor has the following demographic data. The route serves a total of 1,688 people on an average weekday. Among its riders 74.37% are members of minority groups, 16.49% are Hispanic, and 45.43% are low income (Under \$30,000 household income). Please understand that these statistics are for the entire line. The portion of the line within the CCPY Transitway

portion of the corridor is a smaller piece of the corridor. No title VI issues have arisen in the design or construction of this facility.

8.2 Van Dorn-Beauregard Alternatives Analysis/Environmental Assessment

The City of Alexandria is also about to undertake a combination of an Alternatives Analysis/Environmental Assessment for a bus rapid transit service in the Van Dorn-Beauregard Corridor of Alexandria. The RFP was sent out on April 26, 2013. The RFP will be returned to the City by May 30, 2013. The City's current plans are for this work to be completed by July, 2015. This corridor is served by several WMATA bus routes. The major ones are Routes 7, 25B, 21A, and 8. These routes were also surveyed by WMATA in its regional bus survey of 2008. Based upon the results of the survey, these routes have the following characteristics:

Demographics of WMATA Bus Riders in the Van Dorn/Beauregard Corridor

	Route 7	Route 25B	Route 21A	Route 8
Percentage of Minority Members	50.25%	72.76%	51.92%	36.38%
Percentage of Hispanics	8.89%	18.26%	2.32%	8.05%
Percentage of People earning Below \$30,000/year	21.34%	37.11%	7.38%	7.98%
Total Number of People Using Line on an Average Weekday	4,974	1,476	633	1,254

Please understand that as with the previous information on the CCPY Transitway, only a portion of each route is in the Van Dorn-Beauregard corridor.

This data indicates that these routes are traversing through areas which have large numbers of People with Limited English Proficiency (LEP). We will rely on our consultants to develop the final public involvement plan, but an important consideration we will make in reviewing the proposals to do this work is the ingenuity the prospective consulting team will use in engaging the LEP community in this corridor. We know from the information we have presented here that there is a large group of Hispanics living in the corridor. The consultant will develop methods to positively involve this group of people in the study's work on a continuing basis. In addition, this corridor may also contain other minority groups who do not speak English proficiently. The consultant will review detailed demographic information and determine if or how these people can also be involved in the study.

We expect to use techniques such as:

- Pro-actively reaching out to the community, such as attending festivals or other large gatherings, and making presentation to local community groups;
- Developing programs for school students;
- Producing project materials in Spanish as well as English;
- Providing translation services at all public meetings; and
- Providing meeting notices at locations in the community and in community-based newspapers.

8.3 King St-Old Town Metrorail Access Improvements

By the end of calendar year 2013, a contractor will be employed by WMATA and funded by Alexandria to rebuild a set of access improvements for the King St-Old Town Metrorail station. These improvements have gone through an extensive vetting process. We have performed a demographic analysis of the users of this facility, using the results of the MWATA 2012 Metrorail customer survey and have determined the following. The station is used by 9,986 people on an average workday with 34.65 % being members of minority groups , 5.18% being Hispanics, and 8.67% low income people (People earning less than \$30,000 Annual Income).

Since this facility is used by a number of LEP riders, an effort will be in place through using the Hispanic media to make sure that this group of transit patrons is aware of the project, and the temporary dislocations which will occur as part of the project. This project should be completed by April, 2015.

8.4 Eisenhower South Metrorail Improvements

In the next year, a final design will be developed for the Eisenhower South and construction should begin. The demographics of this station are such that while not many Hispanics may live near the station, a significant number of Hispanics use the movie theaters and governmental facilities near the station. These are the findings of the results of the WMATA 2012 Metrorail customer survey which verify this conclusion. The station is used by 2,017 people on an average weekday, with 39.78% members of minority groups 5.93% Hispanics, and 6.88% low income people (People earning less than \$30,000 Annual Income). When construction begins, an outreach effort will be made to make the LEP population using the station aware of any short term service disruptions due to construction.

8.5 Alexandria Transit Service Improvements

The final major FTA project involves the erection of new bus shelters, amenities, and pedestrian travel paths to bus shelters throughout the City. The design of the bus shelters will be finished shortly, and the actual construction is scheduled to begin in September, 2013. The pedestrian walkways to transit are scheduled to begin construction in the summer of 2013. This work should

be finished up in 2014. In any areas where large concentrations of LEP individuals are identified which might be impacted by the construction, information will be distributed to the individuals who will be adversely impacted by this construction.

Appendix A

Notice to the General Public

In order to comply with 49 CFR Section 21.9(d), the City of Alexandria shall provide information to the public regarding their Title VI obligations and apprise members of the public of the protections against discrimination afforded to them by Title VI. The paragraph below will be inserted into all significant publications that are distributed to the public. The text will be placed permanently on the City's website: <http://alexandriava.gov>.

"The City of Alexandria fully complies with Title VI of the Civil Rights Act of 1964 and related statutes and regulations in all programs and activities. For more information, or to file a Title VI related complaint, see <http://alexndriava.go> or call (703) 746-3140. Para información en español, llame al (703) 746-3140."

Appendix B

INSTRUCTIONS FOR FILING A COMPLAINT AND COMPLAINT FORM

Procedures

1. Any individual, group of individuals, or entity that believes he/she, they, or it have been subjected to discrimination prohibited by Title VI nondiscrimination procedures may file a written complaint with the City of Alexandria's Title VI Officer. A formal complaint must be filed within 180 calendar days of the alleged occurrence or when the alleged discrimination became known to the complainant. The complaint must meet the following requirements:
 - a. Complaint shall be in writing and signed by the complainant(s).
 - b. Include the date of the alleged act of discrimination (date when the complainant(s) became aware of the alleged discrimination; or the date on which that conduct was discontinued or the latest instance of the conduct).
 - c. Present a detailed description of the issues, including names and job titles of those individuals perceived as parties in the complained-of incident.
 - d. Allegations received by fax or e-mail will be acknowledged and processed, once the identity(ies) of the complainant(s) and the intent to proceed with the complaint have been established. For this, the complainant is required to mail a signed, original copy of the fax or e-mail transmittal for COG to be able to process it.
 - e. Complaints received by telephone will be entered into a log listing time, date, and complainant. Complainants will be informed to file a complaint in writing and will be directed to the website or other templates suggesting complaint form.
2. Upon receipt of the complaint, the Title VI Officer will refer the matter to the City Attorney who will determine its jurisdiction, acceptability, and need for additional information, as well as investigate the merit of the complaint. Complaints against the Alexandria will be referred by the City Attorney to the appropriate state or federal agencies for proper disposition pursuant to their procedures. In special cases warranting intervention to ensure equity, these agencies may assume jurisdiction and either complete or obtain services to review or investigate matters.
3. In order to be accepted, a complaint must meet the following criteria:
 - a. The complaint must be filed within 180 calendar days of the alleged occurrence or when the alleged discrimination became known to the complainant.

- b. The allegation(s) must involve a covered basis such as race, color, natural origin, gender, disability, or retaliation.
 - c. The allegation(s) must involve a program or activity of a Federal-aid recipient, sub-recipient, or contractor, or, in the case of ADA allegations, an entity open to the public.
 - d. The complainant(s) must accept reasonable resolution based on the City's administrative authority (reasonability to be determined by Alexandria).
 - 4. A complaint may be dismissed for the following reasons:
 - a. The complainant requests the withdrawal of the complaint.
 - b. The complainant fails to respond to repeated requests for additional information needed to process the complaint.
 - c. The complainant cannot be located after reasonable attempts.
 - 5. Once Alexandria or a state or federal agency decides to accept the complaint for investigation, the complainant and the respondent will be notified in writing of such determination within five calendar days. The complaint will receive a case number and will then be logged in the records of Alexandria or the agency referred to identifying its basis and alleged harm, and the race, color, national origin, and gender of the complainant.
 - 6. In cases where Alexandria assumes the investigation of the complaint, Alexandria will provide the respondent with the opportunity to respond to the allegations in writing. The respondent will have 10 calendar days from the date of Alexandria's written notification of acceptance of the complaint to furnish his/her response to the allegations.
 - 7. In cases where Alexandria assumes the investigation of the complaint, within 40 calendar days of the acceptance of the complaint, the City Attorney, with assistance from the appropriate Title VI Coordinator will prepare an investigative report for review by the City Manager. The report shall include a narrative description of the incident, identification of persons interviewed, findings, and recommendations for disposition.
 - 8. The City Attorney and the appropriate Title VI Coordinator will discuss the report and recommendations with the City Manager within 10 calendar days. The report will be modified as needed and made final for its release.
 - 9. Alexandria's final investigative report and a copy of the complaint will be forwarded to the appropriate state agency within 60 calendar days of the acceptance of the complaint.
 - 10. Alexandria will notify the parties of its preliminary findings, which may be subject to concurrence from the appropriate Commonwealth agency.
 - 11. Once a Commonwealth agency issues its final decision, Alexandria will notify all parties involved about such determination. State determinations are not subject to an appeal.
-

**City of Alexandria
Title VI Complaint Form
February 11, 2013**

Name: _____

Address: _____

Telephone Numbers:

(Home) _____ (Work) _____

Electronic Mail Address: _____

Accessible Format Requirements?

Large Print _____ Audio tape _____

TDD _____ Other _____

Are you filing this complaint on your own behalf?

Yes _____ No _____

[If you answered "yes" to this question, go to Section III.]

If not, please supply the name and relationship of the person for whom you are complaining:

Please explain why you have filed for a third party. _____

If you are filing on behalf of a third party, have you have obtained the permission of the aggrieved party?

Yes _____ No _____

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

Yes _____ No _____

If Yes, please list:

Federal agency _____

State Agency _____

Local Agency _____

Federal Court _____

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

If you answered "yes" to either of the two previous questions, please provide a copy of the complaint form or lawsuit.

[Note: This above information is helpful for administrative tracking purposes. However, if litigation is pending regarding the same issues, we defer to the decision of the court, and Alexandria will not take action.]

Name of office or department you believe discriminated against you:

Office or Department _____

Name of Individual (if applicable) _____

Address _____

City _____ State _____ Zip code _____

Telephone _____

Basis(es) for complaint, check all that apply:

☐ Race ☐ Color ☐ National Origin

On separate sheets, please describe your complaint. You should include specific details such as names, dates, times, witnesses, and any other information that would assist us in our investigation of your allegations. Please also provide any other documentation that is relevant to this complaint.

Please sign here: _____

Date: _____

[Note - We cannot accept your complaint without a signature.]

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

Please mail your completed form to: The City Attorney, City of Alexandria, 301 King Street, Suite 1300, Alexandria, VA 22314

Alternative formats of this form can be made available by request: Robin.wilson@alexandriava.gov:
Phone: 703-746-3750 or please use the free Virginia Relay System at 7-1-1. Please allow seven (7) working days for preparation of the material.

Appendix C

Largest Groups of Languages Spoken at Home Other than English in Alexandria

People Speaking Spanish at Home in Alexandria

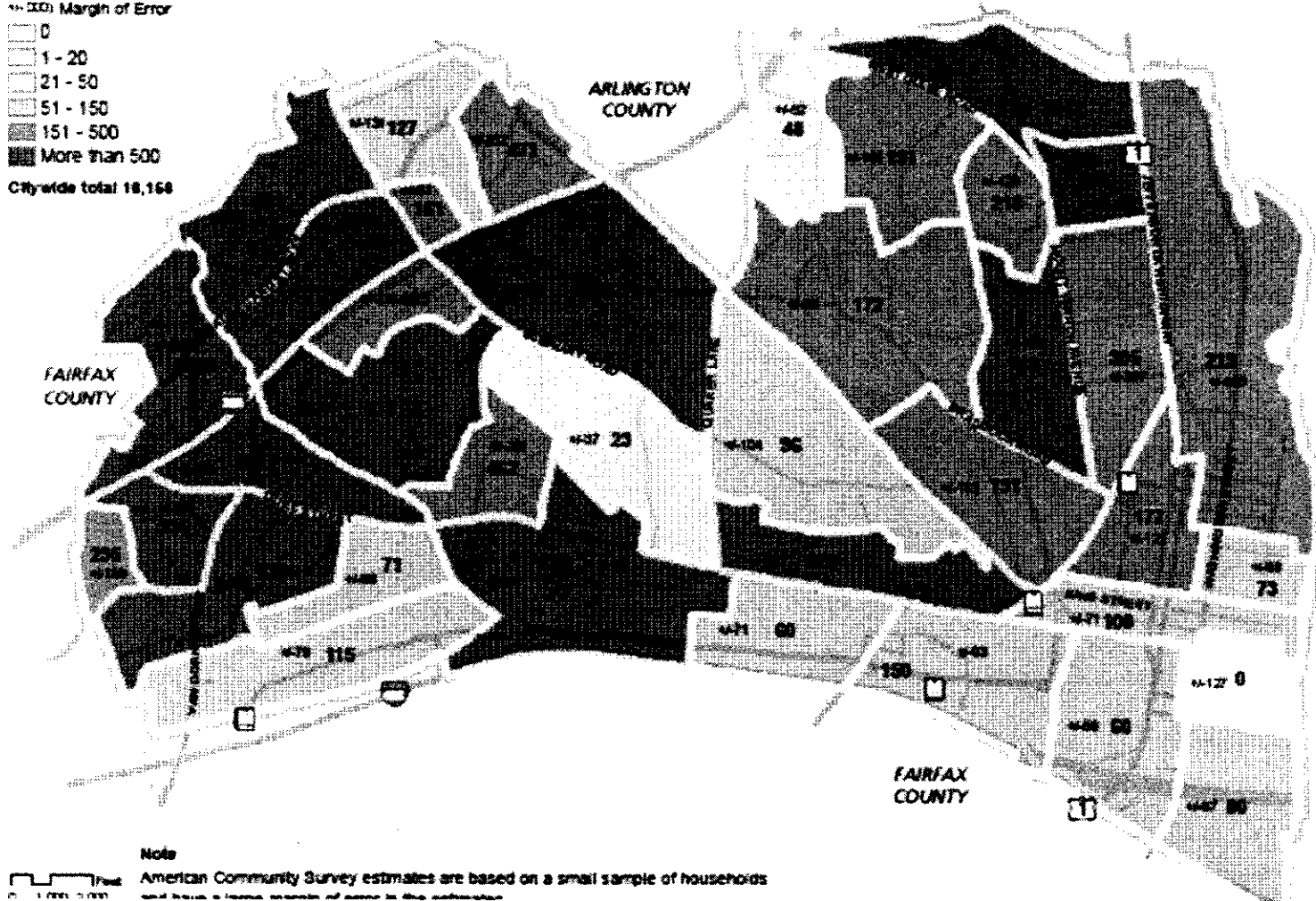
N=18,168

Estimated Number of People 5 Years Old and Older Speaking Spanish at Home American Community Survey 2006-2010 5-year Average

000 Estimate
±(XXX) Margin of Error

0
1 - 20
21 - 50
51 - 150
151 - 500
More than 500

Citywide total 18,168

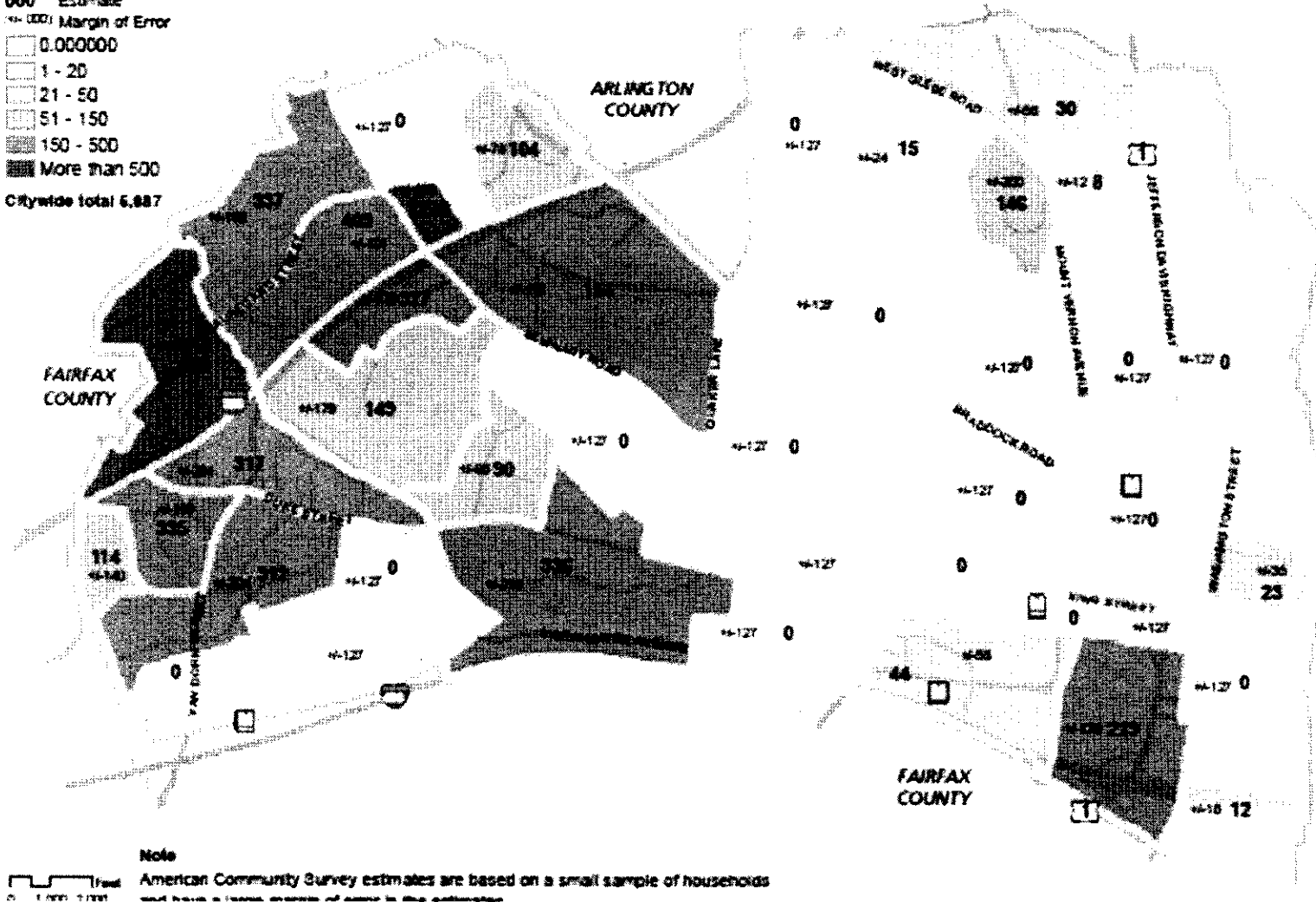


People Speaking African Languages at Home in Alexandria

N=6,687

Estimated Number of People 5 Years Old and Older Speaking African Languages at Home, American Community Survey 2006-2010 5-year Average

000 Estimate
 +/- (000) Margin of Error
 0.000000
 1 - 20
 21 - 50
 51 - 150
 150 - 500
 More than 500
 Citywide total 6,687



People Speaking Arabic in Alexandria

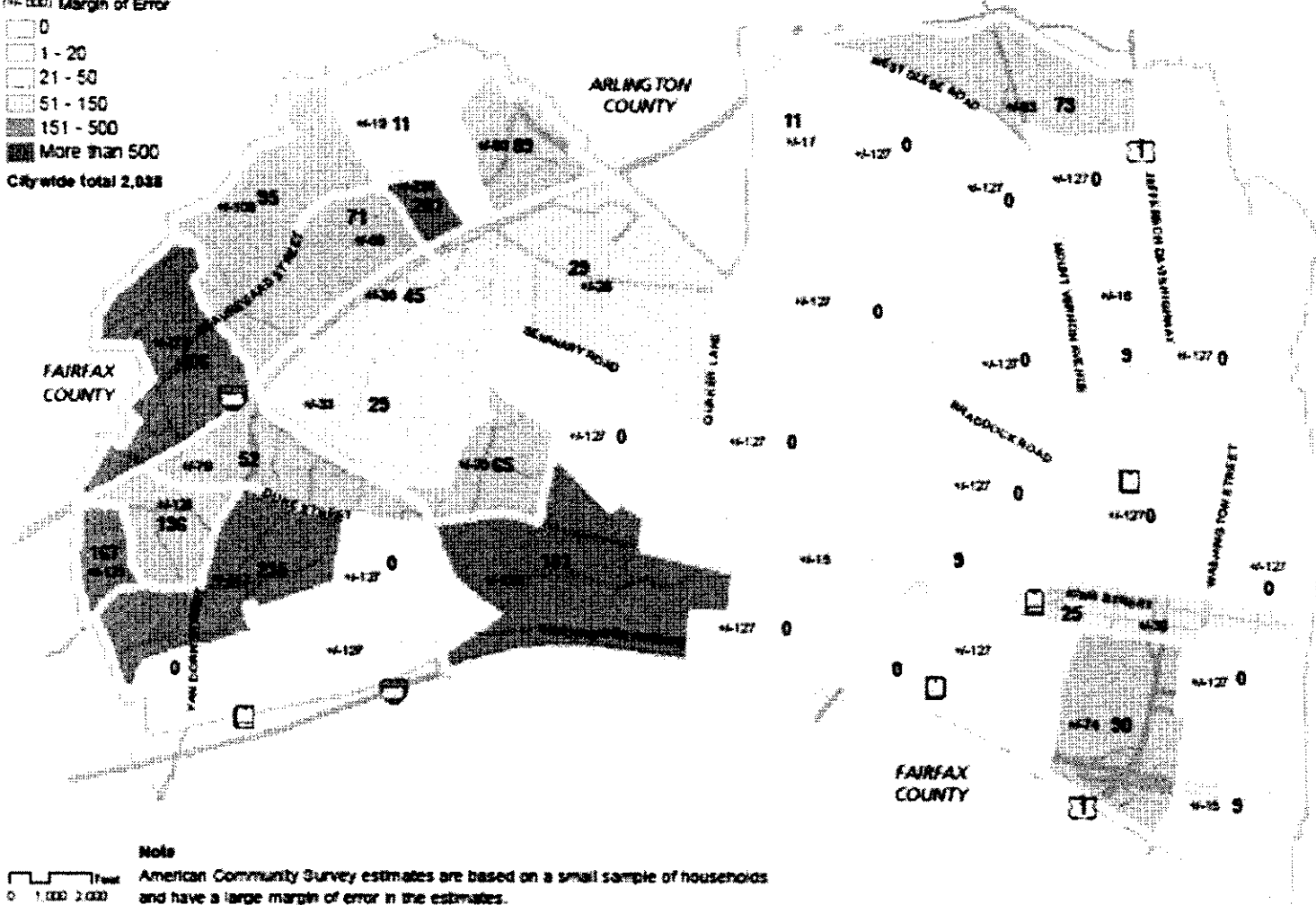
N=2,038

Estimated Number of People 5 Years Old and Older Speaking Arabic at Home :
American Community Survey 2006-2010 5-year Average

000 Estimate
(+/- 000) Margin of Error

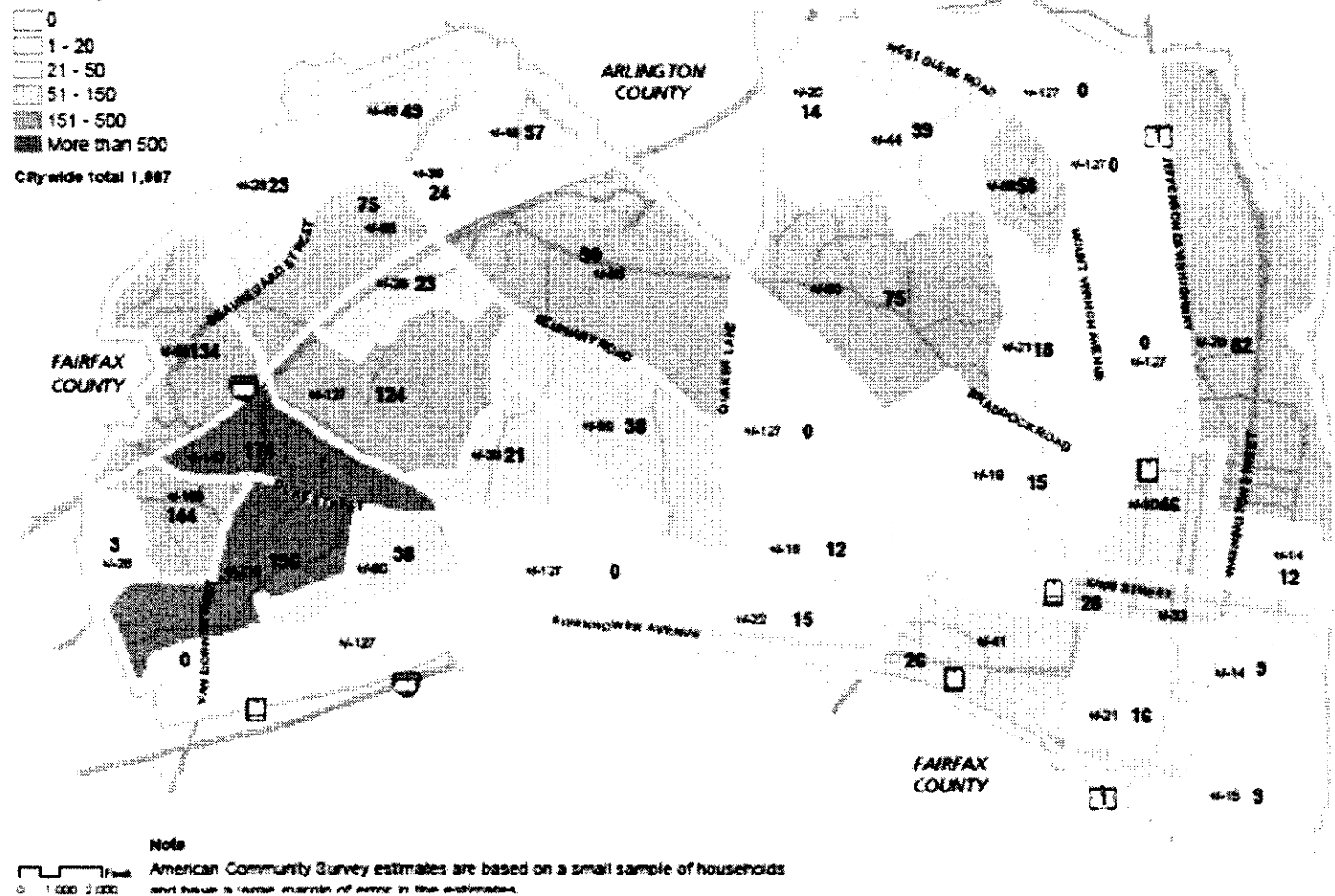
0
1 - 20
21 - 50
51 - 150
151 - 500
More than 500

Citywide total 2,038



N=1,667

000 Estimate
1-4 000 Margin of Error

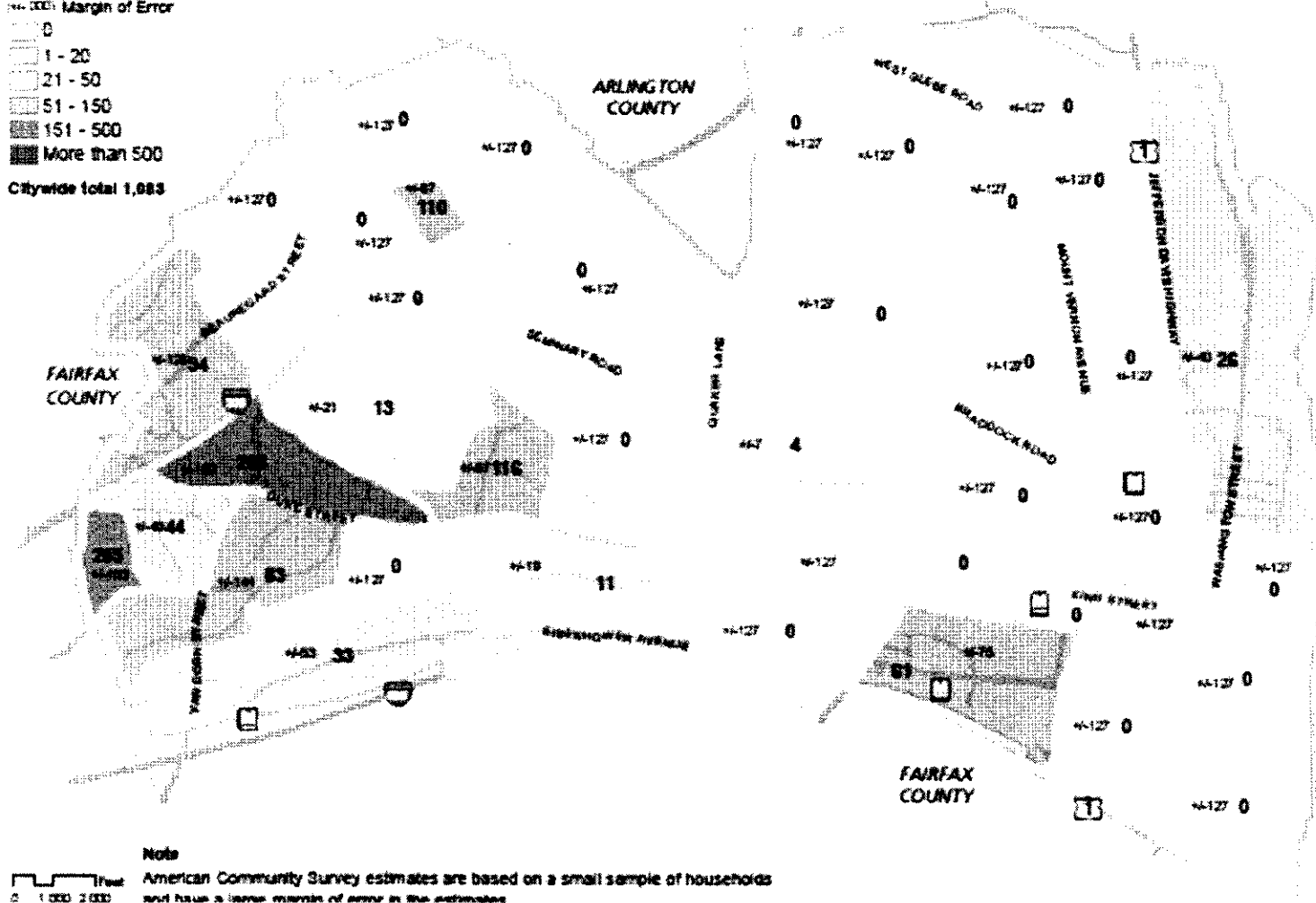


People Speaking Persian at Home in Alexandria

N=1,083

Estimated Number of People 5 Years Old and Older Speaking Persian at Home American Community Survey 2006-2010 5-year Average

000 Estimate
±000 Margin of Error
0
1 - 20
21 - 50
51 - 150
151 - 500
More than 500
Citywide total 1,083



Appendix D

Percentages of Ethnic Groups by Census Tracts in Alexandria

Percent Black or African American in Alexandria by Census Tract

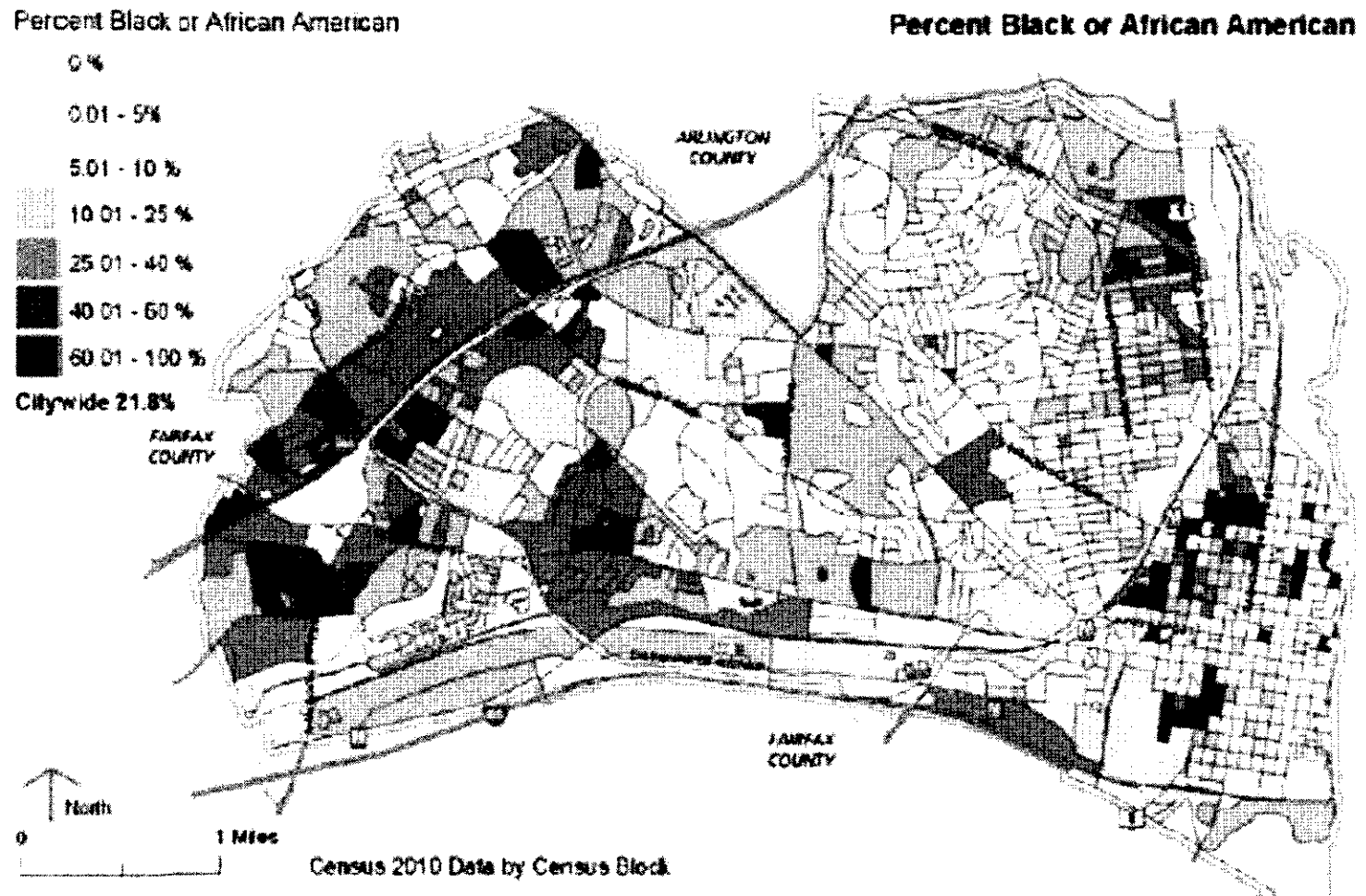


Figure 10. Percent Black or African American.

Percent Hispanic in Alexandria by Census Tract

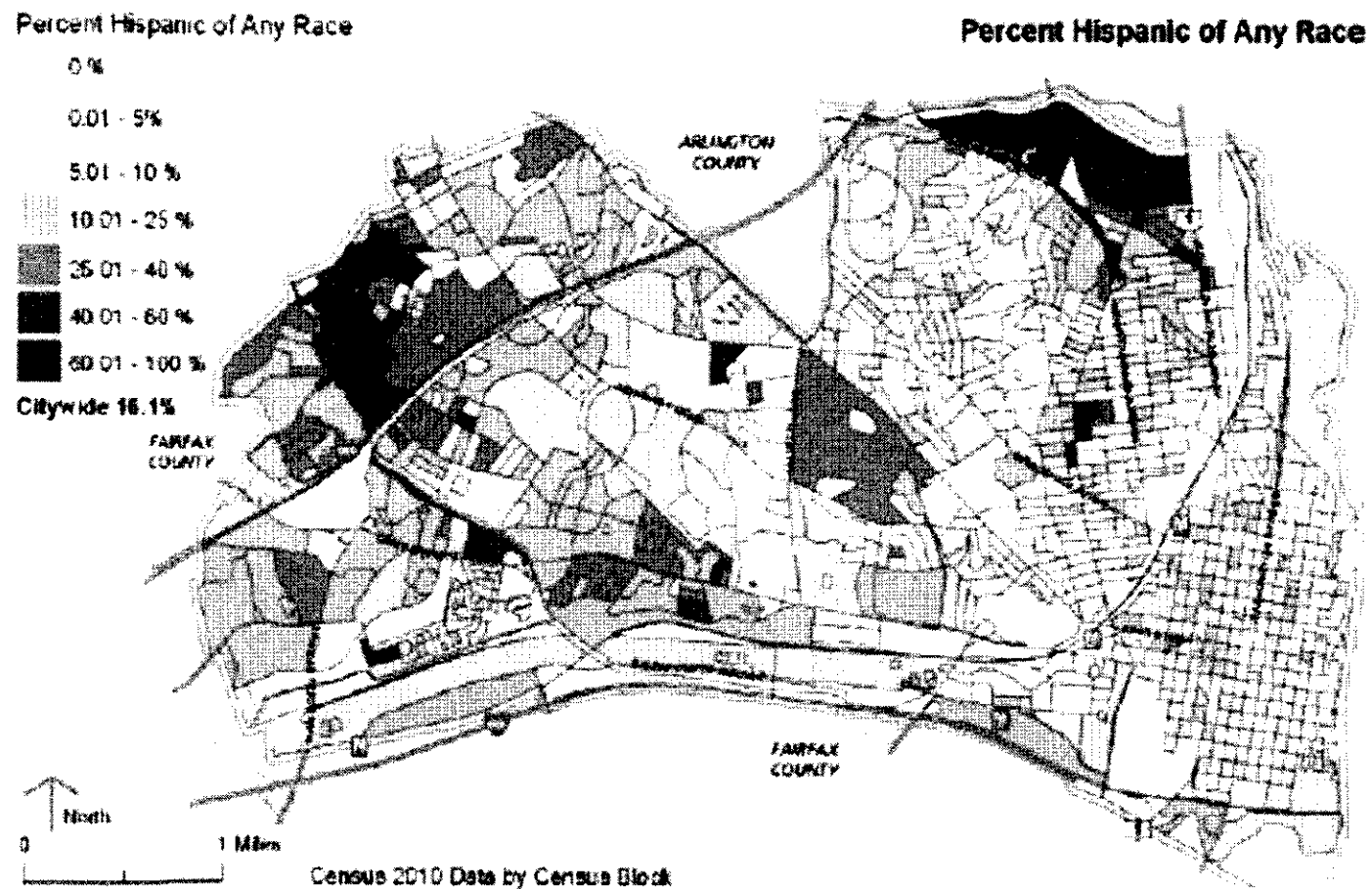


Figure 12. Percent Hispanic. This figure shows the concentrations of Hispanic residents in the City in 2010. Many blocks that show 0% Hispanic are commercial or open space blocks that do not have residents.

Appendix E

The City of Alexandria's Language Access Policy

- Policy:** All City departments will ensure that Persons with Limited English Proficiency (LEP) receive the language assistance necessary to allow access to services through individual department language assistance plans.
- Title:** Title VI of the Civil Rights Act of 1964; Policy on the Prohibition against National Origin Discrimination as it Affects Persons with Limited English Proficiency
- Staff:** The City of Alexandria has people in different departments facilitating this plan, with one person in the Communications and public Information/Community Relations coordinating all LEP services provided by the City.

1.0 CITY'S LANGUAGE ASSISTANCE PLAN

A. Persons covered by this plan

This plan was developed to serve all City of Alexandria residents who do not speak, read, write or understand English or who do so on a limited basis. A city resident has Limited English Proficiency (LEP) when he/she is not able to speak, read, write or understand the English language to the extent that allows him/her to interact effectively with English-speaking City staff.

B. City of Alexandria Commitment to Program Access

No person will be denied access to City information, programs or services because he/she does not speak English or communicates in English on a limited basis. City staff will provide effective communication with Limited English Proficiency (LEP) residents and staff by making appropriate language assistance services available when city residents need these services. The City of Alexandria will provide its residents access to City information, programs and services in a timely manner at no cost to the resident.

C. Affirmative Offer of Language Assistance

City staff will initiate an offer for language assistance services to residents who have difficulty communicating in English. In many offices, bilingual City employees are available to assist LEP people. If a person is not available, the Language Line can also be used to provide interpretive services to LEP people. In addition, when residents ask for language assistance, staff must offer free interpretation services in a language they understand, in a way that **preserves confidentiality**, and in a timely manner. Whenever possible, staff are encouraged to follow the Limited English Proficiency (LEP) person's preferences.

2.0 USING AN INTERPRETER

A. General Requirements

- **Document Use of Language Assistance Services**

Staff must always document in the Limited English Proficiency (LEP) person's file, keeping appropriate records when an interpreter is used or when a Limited English Proficiency (LEP) person makes use of another form of language assistance. Accurate documentation is especially important for direct service staff. If the Limited English Proficiency (LEP) person has been offered free interpretive services and chooses to utilize their own interpreter, i.e. friend, family member or community member, the Limited English Proficiency (LEP) person must sign a waiver indicating that they are giving up their right to free interpreter services. The waiver will be in effect for the time period indicated on the form (to be determined jointly between the staff person and the Limited English Proficiency (LEP) person but will not exceed the period of one year. **Staff should never require, suggest, or encourage a Limited English Proficiency (LEP) person to use family members or friends as interpreters.**

- **Do Not Use Minor Children**

At no time will anyone under 18 years of age, including friends, family members or children, be utilized to provide interpretive services.

- **In-Person Interpreter Services**

If an interpreter is needed in-person, rather than over the telephone, staff will make every reasonable effort to have an interpreter available at a time and place that is convenient for both the interpreter and the Limited English Proficiency (LEP) person. Staff may arrange for in-person interpreting by contacting City-approved Language Assistance Services vendors directly.

- **Limited English Proficiency (LEP) person cannot read or write in their own language**

When confronted with a situation in which the Limited English Proficiency (LEP) person is illiterate – cannot read or write in his or her own language – the staff person, with assistance from an interpreter, will assist the Limited English Proficiency (LEP) individual in the completion of necessary forms and documents. Preferably, an in-person interpreter will be used. However, if that is not possible, a contracted Language Assistance Services interpreter will be utilized.

3.0 INTERPRETER RESOURCES (by Order of Preference)

As much as possible, staff should use interpreter services in the following order of preference:

1. Bilingual Staff

- a.** City departments will use their best efforts to assign Limited English Proficiency (LEP) persons to bilingual staff who speak their language. In the event that there are not enough direct service bilingual staff available to assist with spoken language needs, the department's staff interpreters will augment available language assistance services on an as-needed basis. As not all departments have staff interpreters on site, the protocol may vary from department to department. Each department/unit must maintain a current and accessible list of staff with language interpretation capacity.

2. Volunteers and Interns

- a.** In the event that an insufficient number of permanent staff is available to assist with spoken language needs, volunteers and interns for that department are accessed for services for these language groups. As not all departments have volunteers or interns on site, the protocol may vary from department to department. Each department/unit must maintain a current and accessible list of volunteers and interns with language interpretation capacity.

3. Telephone Interpreter Services- Language Line Services

- a.** Language Line Services, formerly known as AT&T Language Line, provides telephone interpretation in over 150 languages 24 hours a day, seven days a week.
- b.** Staff should use Language Line Services when bilingual staff, volunteer staff interpreters or volunteers and interns are not available.
- c.** Access to Language Line:
 - Users of Language Line are charged on a per-minute basis.
 - Current flat rate is a \$1.30 per minute for all languages.
 - To access Language Line Services, staff are provided an ID number and access code.
 - All staff should be given the opportunity to familiarize themselves with the Language Line before they actually need to use it.

4.0 TRANSLATION RESOURCES (WRITTEN MATERIALS)

A. Translation of Written Materials

Each Department must translate written material, including vital documents for each Limited English Proficiency (LEP) language group that constitutes 5% or 1,000 (whichever is less) of population eligible to be served. The City of Alexandria has identified Spanish as one language that currently meets the above criteria for translation of vital documents.

1. Vital Documents or Information

Vital documents or information are those that are critical for accessing City services.

2. Limited English Proficiency (LEP) person cannot read or write in their own language

When confronted with a situation in which the Limited English Proficiency (LEP) person is illiterate – cannot read or write in his or her own language – the staff person, with assistance from an interpreter, will assist the Limited English Proficiency (LEP) individual in the completion of necessary forms and documents. Preferably, an on-site interpreter will be used. However, if that is not possible, a contracted service interpreter will be utilized.
