

Resolution No. 3100

WHEREAS, the City of Alexandria is a subrecipient of the Virginia Department of Transportation (VDOT) for Federal Highway Administration (FHWA) funds; and

WHEREAS, Title 23 of the Code of Federal Regulations Part 200, Title 49 of the Code of Federal Regulations, Part 21, and the U.S. Department of Transportation Title VI Order 1.000.12C dated June 11, 2021, requires subrecipients to have their own Title VI programs and to submit the Program to the primary recipient,

WHEREAS, City of Alexandria staff have updated the City of Alexandria's Federal Transit Administration Title VI Program in adherence with VDOT requirements of subrecipients to develop a unique program for FHWA; and

WHEREAS, the Program has been reviewed by VDOT and their comments have been incorporated into the updated Program, attached hereto;

NOW, THEREFORE, IT IS HEREBY RESOLVED, by the City Council of the City of Alexandria, Virginia that the updated FHWA Title VI Program is hereby adopted; and that the City Manager is hereby authorized and directed to implement the Title VI Program in compliance with Federal Law.

Adopted: September 28, 2022

ATTEST:


Gloria A. Sitton, CMC City Clerk


Justin M. Wilson, Mayor

The City of Alexandria's Federal Highway Administration (FHWA) Title VI Program



City of Alexandria September 2022

Title VI Notice:

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 <https://www.alexandriava.gov/HumanRights> and or call (703) 746-3140.

Para información en español, llame al (703) 746-3140.

The City of Alexandria's Federal Highway Administration (FHWA)

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 funds from the U.S. Department of Transportation's operating administration as a sub-recipient of the Northern Virginia Transportation Commission ("NVTC") and Virginia Department of Transportation ("VDOT").

The City has established a Title VI Program to comply with the U.S. Department of Transportation ("DOT") Title VI regulations (49 CFR part 21) as amended 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).

The City Title VI program shall follow all the requirements of DOT's operating administrations, especially Federal Highway Administration ("FHWA") FHWA 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.

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1.0 General Policy Statement

The City of Alexandria ("City") is committed to ensuring that no person is excluded from participation in or denied the benefits of its services on the basis of race, color or national origin, as provided by Title VI of the Civil Rights Act of 1964, as amended. To this end, it is the City's objective to:

- Ensure that the level and quality of transportation service is provided without regard to race, color or national origin;
- Identify and address, as appropriate, disproportionately high and adverse human health and environmental effects, including social and economic effects of programs and activities on minority populations and low-income populations;
- Promote the full and fair participation of all affected populations in transportation decision making;
- Prevent the denial, reduction or delay in benefits related to programs and activities that benefit minority populations or low-income populations and;
- Ensure meaningful access to programs and activities by persons with limited English proficiency ("LEP").

The City Manager and all City employees share the responsibility for carrying out the City's commitment to Title VI. In addition to the explanation of how the City will meet Title VI requirements laid out in the following sections of this program, the City will ensure complete compliance by doing the following as required by VDOT:

1. Administration: collect employee demographic data by race.
2. Administration: designate a Title VI Coordinator who has direct access to the City Manager demonstrated through the City's organizational chart.
3. Training: track Title VI training participation.
4. Contracting Activities: track progress toward achieving disadvantaged business enterprise (DBE) goals.
5. Contracting Activities: insert the Title VI/Nondiscrimination paragraph from the U.S. DOT Standard Title VI Assurances into all solicitations for bids and requests for proposals that include federal funds.
6. Right of Way Activities: Insert Title VI language in all acquisition, negotiation, property management communications, and contracts that include federal funds.
7. Right of Way Activities: Insert Title VI language into deeds, permits, and leases that contain Title VI compliance clauses when federal funds are being used.
8. Right of Way Activities: insert Title VI language and assurance statements in all surveys of property owners and tenants after the conclusion of all business when federal funds are being used.
9. Right of Way Activities: collect statistical data on race, color, national origin and limited English proficiency for all relocates when federal funds are being used.

2.0 Assurances to Metropolitan Washington Council of Governments/NVTC/VDOT that the City of Alexandria is Complying with Title VI of the Civil Rights Act of 1964

Assurance of Compliance - General Assurances

In accordance with the Acts, the Regulations, and other pertinent directives, circulars, policy, memoranda, and/or guidance, the City of Alexandria hereby gives assurance that it will promptly take any measures necessary to ensure that:

The City of Alexandria complies with Title VI of the Civil Rights Act of 1964, as amended. The City's Human Rights Code prohibits discrimination against any person in housing, employment, public accommodations, City contracts, health and social services, credit and education, based on race, color, national origin, sex, religion, ancestry, marital status, familial status, age, disability, sexual orientation, gender identity or transgender status.

Title VI Assurance - Specific Assurances

More specifically, and without limiting the above general Assurance, the City of Alexandria agrees with and gives the following Assurances with respect to its federally assisted Highway Program:

In accordance with 49 CFR Section 21.7, every application for financial assistance from the Federal Highway Administration (FHWA) 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 FHWA prior to receiving FHWA funds. The City of Alexandria provides this assurance in consideration of, and for the purpose of, obtaining FHWA grants, loans, contracts, property, discounts or other FHWA financial assistance.

3.0 Notice to the Public Regarding Title VI Obligations

The City of Alexandria will provide notice to the public regarding its Title VI obligations and the protections available to the public. The notice is included in Appendix A. It 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 for Title VI complaint procedure and form). 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 City Hall, the City's libraries, and such major transit facilities as the King St-Old Town Metrorail station, and on the City's website.

4.0 Investigations of Alleged Discrimination

The City of Alexandria Office of Human Rights investigates any allegations of discrimination in the City. The City of Alexandria will record any Title VI investigations, complaints, or lawsuits. Complaints may be received from the public by the sub-recipient, by the City via 311, the City's Office of Human Rights website intake form, the City Manager's Office, or the City Attorney's Office. All complaints will be referred to the Human Rights Office Title VI Liaison. The Human Rights Office will maintain a list, which 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. All complaints will be forwarded to FHWA. The City will encourage use of the complaint form attached in Appendix B.

5.0 Recent Title VI Investigations, Complaints, and Lawsuits

The City of Alexandria has had no Title VI complaints since its last submittal in 2019. No Title VI complaints had been filed prior to 2019.

6.0 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 minority, low-income, and Limited English Proficiency (LEP) populations to access and 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 Department of Transportation & Environmental Services has and will continue to coordinate with the City of Alexandria's Office of Communications and Public Information and the City of Alexandria's Office of Human Rights 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 include the following:

- Meeting with groups who have expressed interest in different projects, such as presentations to civic associations to provide information and solicit feedback on specific projects. This includes attending regularly-scheduled meetings with community groups that specifically serve underrepresented populations or neighborhoods with high percentages of such individuals. Examples include Casa Chirilagua, Ethiopian Development Council, West End Civic Association, the Alexandria Commission on Persons with Disabilities, and the Alexandria Commission for Women.
- Holding project-specific public meetings to solicit input. In areas of the City with large populations of LEP people, the City provides written materials in appropriate languages, such as Spanish and Amharic, and tries to have translators present at these meetings.
- Providing printed materials, posters, and flyers in both English, Spanish and Amharic, depending on the communities that are impacted by the subject proposal, project, or service/policy change.

- Performing pop-up meetings at locations and times where large numbers of minority, low-income and LEP individuals who could be affected by a transportation project are likely to be present.
- Employing the City's general website, the City's GoAlex website, and the DASH website to provide announcements of public meetings and to provide information to the general public about issues that were raised at the meetings. For major projects and initiatives, the City sites may also include information translated into Spanish or Amharic, as was done for recent city projects like the Alexandria Transit Vision Plan and New DASH Network.
- Announcing meetings using the eNews service, which reaches thousands of subscribers who have opted into receiving transportation-related updates.
- Before transportation surveys are administered, ensuring that all people affected by the action who may have Limited English Proficiency have surveys available in their native language. In the past, the City has printed transportation surveys in Spanish and Amharic, which is the native language of a significant percentage of City residents, particularly in West Alexandria. 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. We also provide people with disabilities with opportunities to fill out surveys. For example, when we conducted one of the Alexandria Transit Vision surveys, we put a Section 508 compliant survey on the webpage for with those with visual impediments and ensure that web materials may be viewed with a screen reader.
- In corridors with a large LEP population, making translators available at all public meetings and making any written materials that will be distributed at the meeting available in the second predominant language as well as English.
- Releasing news releases on important meetings that may be picked up by the Washington Post and local newspapers.
- Providing information to Spanish-speaking media outlets, including El Tiempo Latino newspaper and website, and Telemundo and Univision television stations, as appropriate.

- Distributing information monthly about transportation issues on the City's GoAlex website.
- In some cases, distributing paper flyers to the houses and/or businesses in the travel corridors being analyzed.
- Using ad hoc committees of citizens and elected officials to assist staff in gauging transportation decisions.
- Holding City Council meetings regularly throughout the year that include opportunities for public comment.
- Holding Transportation Commission and Traffic and Parking Board meetings once per month and including a public comment period during which members of the public are able to provide testimony to the Commission.
- Making proceedings from City Council, Transportation Commission and Traffic and Parking Board available for public viewing on the Internet.
- At times providing information on the local cable television station.
- Distributing information through City and DASH social media platforms, including Twitter, Facebook and occasionally LinkedIn and Instagram.

7.0 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 cost to provide LEP assistance.¹

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;

To determine the total number of LEP people in the City, the results of the 2015-2019 Public Use Microdata Sample (PUMS) conducted by the U.S. Census were used. According to these figures, approximately two-thirds of Alexandria residents (67%) speak English only. The most common language other than English is Spanish, which is the primary language of 21,112 residents (14% of the population). Other Indo-European languages are used by 9,172 residents (6% of the population). Asian and Pacific Islander languages are spoken at home by 4,980 residents (3% of the population). People speaking other languages, such as Amharic or Arabic, constitute 10% of the City's population (13,841 residents).

Attached in Appendix C are the census tract maps that indicate where the major groups of languages most spoken at home other than English are located. Attached in Appendix D are maps that indicate the percentage of Black or African American people and the percentage of Hispanics in each census tract in the City.

The City also reviewed another piece of data from the American Community Survey. In this survey, 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, 10,065 residents (52% of those speaking Spanish at home) stated 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 provide the best information.

Based on this data, the City developed a public outreach plan that included methods to actively solicit the input of LEP people.

¹ See U.S. Dep't of Transportation, *DOT's LEP Guidance*, [transportation.gov/civil-rights/civil-rights-awareness-enforcement/dots-lep-guidance](https://www.transportation.gov/civil-rights/civil-rights-awareness-enforcement/dots-lep-guidance) (last updated Jan. 5, 2016).

Factor 2: The frequency with which LEP individuals come into contact with the City of Alexandria's FHWA-related 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 City's Transportation Demand Management program, GoAlex, regularly engages with the Limited English Proficiency population at several multi-cultural events that are held in the City. Examples include the Alexandria Chiriluagua Festival and the Cambodian Festival. The City will continue to reach out to this important group about(?) providing transit services and facilities that can improve their travel experience.

The City will make an effort to ensure that important projects that will affect LEP populations are identified 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 developed a Language Assistance Plan in 2003, which was updated in 2008. The City is currently undergoing another update to this plan in line with the City's Race and Social Equity Initiative, All Alexandria, which was formulated in 2020. The City has historically provided an extensive amount of resources for interpretive services. The City budgets about \$75,000 annually for translation services. Additionally, project budgets often include additional funding for translation services, such as for the Alexandria Mobility Plan, the update to the City's Transportation Master Plan, the Alexandria Transit Vision Plan, and Duke Street in Motion, to reimagine transit on the Duke Street Corridor.

The 2008 plan, which indicates all of the resources that the City had available to those who have Limited English Proficiency can be found in Appendix E.

8.0 Analysis of Non-Elected Transportation Boards and Commissions Appointed by Alexandria

The City of Alexandria has had three city commissions or advisory groups that deal with transportation issues. These are the Transportation Commission, the Potomac Yard Metrorail Implementation Work Group, and the Traffic and Parking Board. The following table illustrates the composition of these groups:

Table of the Composition of Transportation-Related Citizen Group

Name of Group	No. of Caucasians	No. of African Americans	No. of Hispanics	No. of Asians/Pacific Islanders	Other	Total
Transportation Commission	9	1	1	0	0	11
Potomac Yard Metrorail Implementation Work Group	12	1	1	0	0	14
Traffic and Parking Board	5	1	0	1	0	5

The Transportation Commission helps the City Council develop transportation policies consistent with the City's transportation master plan, the Alexandria Mobility Plan. As of February 2022, the Transportation Commission has one African American representative. Two additional African American representatives recently resigned, one to join City Council. The Transportation Commission has one Hispanic representative who serves as Chair. There are a total of eleven people on the Commission, whose members are appointed by other City commissions and the City Council. Its meetings are publicized via various City media channels and have had considerable representation from audience members. Staff is considering various creative ways to try to encourage more diverse applicants for the Commission.

Commissioners have been strong advocates for ensuring all, but particularly project level, public outreach efforts solicit a diversity of opinions from a diversity of backgrounds that represent the City as a whole. For the Alexandria Mobility Plan outreach, which was guided by

Commissioners, staff translated materials into Spanish and Amharic and had Spanish and Amharic translators at pop-up events in locations of the City with significant Spanish and Amharic speaking populations. Focus groups were also conducted in Spanish, and staff and translators managed a table at a Spanish public meeting for the Arlandria neighborhood.

In the development of the Potomac Yard Metrorail Station, citizen work groups have provided an important forum for community and stakeholder input. A Metrorail Station Feasibility Work Group was established in 2008 and met through 2010. In 2011, the Potomac Yard Metrorail Station Feasibility Work Group was re-convened as the Potomac Yard Metrorail Implementation Work Group (PYMIG) to ensure a thorough technical analysis of a potential new Metrorail station. In September 2015, City Council revised PYMIG's responsibilities and composition to enable PYMIG to function as a forum for the public outreach process through station opening and allow the group to consider the variety of issues that will arise as the project moves into design and construction. The group includes two members of City Council, one of whom is Hispanic, four representatives from other City commissions, one business representative, and four community representatives, one of whom is African American.

The Traffic and Parking Board investigates, studies, and analyzes traffic and parking problems within the City. It moreover devises plans, methods and means to control and relieve parking and traffic congestion. Furthermore, the Traffic and Parking Board has jurisdiction over taxicabs and their owners/operators.

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 that 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.

9.0 Requirement to Collect Demographic Data

The City will provide a voluntary demographic questionnaire at meetings and when collecting comments on state and Federally funded transportation projects as required by VDOT.

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 <https://www.alexandriava.gov/HumanRights> or call (703) 746-3140. Para información en español, llame al (703) 746-3140."

Apéndice A: Aviso al Público en General

A los fines de cumplir con la Sección 21.9(d) del 49 CRF, la Ciudad de Alexandria le proporcionará al público información relacionada con las obligaciones de esta ciudad con respecto al Título VI y hará saber a todos las protecciones anti-discriminatorias que les brinda esta ley. El párrafo citado a continuación va a ser insertado en todas las publicaciones importantes que se distribuyen al público. Dicho texto también ocupará un lugar permanente en el sitio Web de la ciudad en: <http://alexandriava.gov>.

“La Ciudad de Alexandria cumple a plenitud con las disposiciones del Título VI de la Ley de Derechos Civiles de 1964 y los estatutos y regulaciones afines en todos los programas y actividades. Para más información, o para presentar una queja relacionada con el Título VI, visite:

<https://www.alexandriava.gov/HumanRights> y www.dashbus.com/titlevi o llame al (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 person who believes that he, she, they, individually, as a member of any protected class, or in connection with any disadvantaged business enterprise (DBE), has been subjected to discrimination prohibited by Title VI of the Civil Rights Act of 1964, as amended, may file a complaint with the City of Alexandria. A complaint may also be filed by a representative on behalf of such a person. All complaints will be referred to the Federal Highway Administration Office of Civil Rights for review and action.
2. The complainant must file the complaint no later than 180 days after:
 - a) The date of the alleged act of discrimination; or
 - b) Where there has been a continuing course of conduct, the date on which that conduct was discontinued. In either case, the recipient or their designee may extend the time for filing or waive the time limit, specifying in writing the reason for so doing.
3. Complaints shall be in writing and shall be signed by the complainant and/or the complainant's representative. Complaints should set forth as fully as possible the facts and circumstances surrounding the claimed discrimination. If a person makes a verbal complaint of discrimination to an officer or employee of the recipient, the person shall be interviewed by the Federal Highway Administration Office of Civil Rights. If necessary, the City of Alexandria Human Rights Office will assist the person in putting the complaint in writing and submit the written version of the complaint to the person for signature.
4. Within 10 days, the Federal Highway Administration Office of Civil Rights will review the complaint to determine whether it has jurisdiction and shall acknowledge receipt of the allegation in writing, inform the complainant of action taken or proposed action to process the complaint, advise the respondent of their rights under Title VI and related statutes, and advise the complainant of other avenues of redress available.

5. Within 10 days, the Federal Highway Administration Office of Civil Rights will send a letter to the appropriate state and federal transportation authorities that will include the following information
 - Name, address, email address and phone number of the complainant
 - Name, address, email address and phone number of the respondent
 - Basis of complaint
 - Date of alleged discriminatory act(s)
 - Date of complaint received by the recipient
 - A statement of the complaint
 - Other agencies (state, local, or federal) where the complaint has been filed
 - An explanation of the actions the recipient has taken or proposed to resolve the issue identified in the complaint
6. Within 180 days, the Federal Highway Administration Office of Civil Rights will conduct and complete an investigation of the allegation and, based on the information obtained, will issue a recommendation for action in a report of findings to the City Attorney and City Manager and as appropriate. If more information is needed to resolve the case, the Title VI Coordinator may contact the complainant in a letter requesting such information. The complainant has 30 business days from the date of the letter to send requested information to the Title VI Coordinator. If the Title VI Coordinator is not contacted by the complainant or does not receive the additional information within 60 business days, the Federal Highway Administration Office of Civil Rights can administratively close the case. A case can also be administratively closed if the complainant no longer wishes to pursue their case. The complaint should be resolved by informal means whenever possible. Such informal attempts and their results will be summarized in the report of findings.
7. Within 90 days of receipt of the complaint, the Federal Highway Administration Office of Civil Rights will notify the complainant in writing of the final decision reached, including the proposed disposition of the matter. The notification will advise the complainant of his/her/their appeal rights.
8. If a discrimination complaint that originated with the City is turned over to and investigated by a state or federal transportation organization or another agency, the Human Rights Office will monitor the investigation and notify the complainant of updates.

9. In accordance with federal law, the City will require that applicants for federal assistance notify the City of any lawsuits filed against the applicant or sub-recipients of federal assistance or alleging discrimination and a statement as to whether the applicant has been found in noncompliance with any relevant civil rights requirements.
10. Pursuant to the Virginia Public Records Act (VPRA) § 42.1-76 et seq., the City will retain Discrimination Complaint Forms and a log of all complaints filed with or investigated by the City. All complaints will be included in future updates of the City's FHWA Title VI Program.
11. Records of complaints and related data will be made available by request in accordance with the Virginia Freedom of Information Act.

The City of Alexandria has had no Title VI investigations or lawsuits and did not receive any Title VI complaints between 2016 and 2021. If the City were to receive any complaints or be subject to a lawsuit or investigation, it would use the following logs for tracking purposes.

Title VI Complaint Form
Title VI Coordinator – City of Alexandria
Miladis Martinez Gutierrez / miladis.martinez@alexandriava.gov / 703-746-3147

Section 1:

Name:

Address:

Phone:

Email:

Accessible Format Requirements (check all that apply)?

Large Print

Audio

TDD

Other

Section 2:

Are you filing the complaint on your own behalf? Yes/No

If you answered “Yes, go to Section 3.”

If you answered “No,” please identify the person for whom you are filing a complaint.

Name:

Relationship:

Please explain why you have filed for a third party:

Please confirm you have obtained the permission of the third party. Yes/No

Section 3:

I believe the discrimination I experienced was based on (check all that apply):

Race

Color

National Origin

Date of Alleged Discrimination (MM/DD/YEAR):

Explain what happened and why you believe you were discriminated against. Include the names and contact information of person(s) involved, both those who discriminated against you (if known) and witnesses. If more space is needed, please use the back of this form.

Section 4:

Have you previously filed a Title VI complaint with the City of Alexandria? Yes/No

Section 5:

Have you filed this complaint with any other Agency or Court? Yes/No

If you answered "Yes," please provide detailed information:

Agency/Court:

Contact Name/Title:

Address:

Phone:

Email:

Section 6:

Agency the complaint is against:

Contact Name/Title:

Phone:

Email:

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

Signature (*required*)

Date (*required*)

To download the Complaint Form please click on this link: www.dashbus.com/titlevi

Please submit this form in person at the address below, or electronically at
miladis.martinez@alexandriava.gov:

City of Alexandria – Office of Human Rights
301 King Street
Alexandria, VA 22314

Apéndice B: INSTRUCCIONES PARA PRESENTAR UNA QUEJA Y FORMULARIO DE QUEJA

Procedimientos

1. Toda persona que crea que en forma individual, como miembro de alguna clase protegida, o debido a su relación con cualquier empresa comercial desfavorecida (DBE) ha sido objeto de un acto discriminatorio prohibido por el Título VI de la Ley de Derechos Civiles de 1964, con sus modificaciones, podrá presentar una queja a la Ciudad de Alexandria y/o a la Compañía de Tránsito de Alexandria (ATC) que opera el servicio de autobús DASH. Un representante también podrá presentar una queja en nombre de dicha persona. Todas las quejas serán remitidas al Coordinador del Título VI de la Ciudad de Alexandria para que las evalúe y adopte las medidas necesarias.
2. El demandante debe presentar la queja dentro de los 180 días siguientes a:
 - a) La fecha del presunto acto discriminatorio; o
 - b) Cuando haya habido una línea de conducta continua, la fecha en que se discontinuó esa conducta. En cualquiera de los casos, el destinatario o la persona por él designada puede extender el momento de presentación o eliminar el límite de tiempo, y deberá especificar por escrito el motivo de ello.
3. Las quejas deberán presentarse por escrito y estar firmadas por el demandante y/o el representante del demandante. Las quejas deben indicar de la manera más completa posible los hechos y las circunstancias en torno a la discriminación alegada. Si una persona expresa una queja verbal de discriminación a un funcionario o empleado del demandado, la persona será entrevistada por el Coordinador del Título VI. De ser necesario, el Coordinador del Título VI ayudará a la persona a presentar la queja por escrito y enviará la versión escrita de la queja a la persona para su firma.
4. Dentro de los 10 días, el Coordinador del Título VI revisará la queja para determinar si la Ciudad de Alexandria tiene jurisdicción y acusará recibo del alegato por escrito, informará al demandante sobre la medida tomada o la medida propuesta para procesar la queja, notificará al demandado sobre sus derechos en virtud del Título VI y estatutos relacionados, y notificará al demandante sobre otros medios de reparación disponibles, tales como:

Alexandria Office of Human Rights (Departamento de Derechos Humanos de Alexandria)
123 N Pitt St, Suite 230
Alexandria, VA 22314

US Department of Transportation (Departamento de Transporte de EE. UU.)
Federal Transit Administration's Office of Civil Rights (Oficina de Derechos Civiles de la Administración Federal de Tránsito)
1200 New Jersey Avenue, 5th Floor
Washington, DC 20590

5. Dentro de los 10 días, se enviará una carta a las autoridades de transporte estatales y federales correspondientes con la siguiente información:
 - Nombre, dirección, correo electrónico y número de teléfono del demandante
 - Nombre, dirección, correo electrónico y número de teléfono del demandado
 - Base de la queja
 - Fecha del presunto acto discriminatorio
 - Fecha en que el destinatario recibió la queja
 - Una declaración de la queja
 - Otras agencias (estatales, locales o federales) donde se haya presentado la queja
 - Una explicación de las medidas que ha tomado o propuesto el destinatario para resolver el problema identificado en la queja
6. Dentro de los 60 días, el Coordinador del Título VI realizará una investigación del alegato y, en función de la información obtenida, enviará una recomendación de acción en un informe de conclusiones al Procurador de la Ciudad, el Administrador de la Ciudad y el Director Ejecutivo/Gerente General de DASH. Si se necesita más información para resolver el caso, el Coordinador del Título VI puede comunicarse con el demandante. El demandante tiene 30 días calendario a partir de la fecha de la carta para enviar la información solicitada al Coordinador del Título VI. Si el Coordinador del Título VI no es contactado por el demandante o no recibe la información adicional en un plazo de 60 días calendario, el Coordinador del Título VI puede cerrar el caso. Un caso también puede cerrarse en forma administrativa si el demandante ya no desea continuar con el caso. La queja debe resolverse por medios informales cuando sea posible. Dichos intentos informales y sus resultados se resumirán en el informe de conclusiones.
7. Dentro de los 90 días de haber recibido la queja, el Coordinador del Título VI notificará al demandante por escrito la decisión final alcanzada, que incluye la resolución propuesta del problema. La notificación informará al demandante sus derechos de apelar.
8. Si se entrega una queja de discriminación que se originó en la Ciudad o en DASH a una organización de transporte estatal o federal u otra agencia y es investigada por esta

organización o agencia, el Coordinador del Título VI supervisará la investigación y notificará las novedades al demandante.

9. De acuerdo con las leyes federales, la Ciudad exigirá que los solicitantes de ayuda federal notifiquen a la Ciudad sobre cualquier demanda presentada contra el solicitante o los beneficiarios secundarios de ayuda federal o de presunta discriminación y una declaración referente a si se ha determinado que el solicitante no ha cumplido con algún requisito de derechos civiles relevante.
10. Conforme a la Ley de Registros Públicos de Virginia (VPRA) § 42.1-76 et seq., la Ciudad conservará Formularios de Queja por Discriminación y un registro de todas las quejas presentadas a la Ciudad o que están siendo investigadas por ella. Todas las quejas se incluirán en futuras actualizaciones del Programa del Título VI de la FHWA de la Ciudad.
11. Los registros de quejas y datos relacionados estarán disponibles a pedido según la Ley de Libertad de Información de Virginia.

La Ciudad de Alexandria no ha tenido investigaciones ni demandas sobre el Título VI, y no recibió ninguna queja sobre el Título VI entre 2016 y 2021. Si la Ciudad recibiera alguna queja o fuera objeto de una demanda o investigación, utilizará los siguientes registros con fines de seguimiento.

Formulario de Quejas sobre el Título VI
Coordinador del Título VI – Ciudad de Alexandria
Miladis Martinez Gutierrez / miladis.martinez@alexandriava.gov / 703-746-3147

Sección 1:

Nombre:

Dirección:

Teléfono:

Correo electrónico:

¿Requisitos de formato accesible? (marcar todos los que correspondan)

Letra de imprenta grande
telefónico para sordos (TDD)

Cinta de audio
Otro

Dispositivo

Sección 2:

¿Está usted presentando esta queja en su propio nombre? Sí/No

Si respondió “Sí”, pase a la Sección 3.

Si respondió “No”, identifique la persona por quien usted está presentando la queja.

Nombre:

Relación:

Por favor explique por qué está presentando la queja a nombre de un tercero:

Confirme que ha obtenido el permiso del tercero. Sí/No

Sección 3:

Considero que la discriminación que sufrí estuvo basada en (marcar todo lo que corresponda):

Raza

Color

Origen nacional

Fecha de la presunta discriminación (MM/DD/AÑO):

Explique lo que sucedió y por qué considera que fue discriminado(a). Incluya los nombres y la información de contacto de las personas involucradas, tanto de las que lo(a) discriminaron (si las conoce) como de los testigos. Si necesita más espacio, use el reverso de este formulario.

Sección 4:

¿Ha presentado anteriormente una queja sobre el Título VI a la Ciudad de Alexandria?
Sí/No

Sección 5:

¿Ha presentado esta queja ante cualquier otra agencia o tribunal? Sí/No

Si respondió "Sí", proporcione información detallada:

Agencia/tribunal:

Nombre/Cargo del contacto:

Dirección:

Teléfono:

Correo electrónico:

Sección 6:

Agencia contra la cual se presenta la queja:

Nombre/Cargo del contacto:

Teléfono:

Correo electrónico:

Puede adjuntar cualquier material escrito u otra información que considere que es relevante para su queja.

Firma (*obligatoria*)

Fecha (*obligatoria*)

Para descargar el Formulario de Queja, haga clic en este enlace: www.dashbus.com/titlevi

Envíe este formulario en persona a la siguiente dirección, o en forma electrónica a miladis.martinez@alexandriava.gov:

City of Alexandria – Office of Human Rights
301 King Street
Alexandria, VA 22314

Appendix C: Demographic Maps – Languages Spoken at Home Other Than English

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

Languages other than English Spoken at Home in Alexandria

2015-2019 American Community Survey (ACS) data indicate the number of residents ages five and older who speak languages other than English at home.¹ Specific languages are reported at the state level whereas four language categories reported at sub-state geographies:

- | | |
|---|--|
| 1. Spanish (including Spanish Creole) | 3. Asian and Pacific Island Languages |
| 2. Other Indo-European languages | <ul style="list-style-type: none">• Chinese• Japanese• Mon-Khmer (Cambodian)• Hmong• Thai• Laotian• Vietnamese• Tagalog• Other Asian or Pacific Island languages |
| <ul style="list-style-type: none">• French• French Creole• Italian• Portuguese• Creole• German• Yiddish• Scandanavian Languages• Greek• Russian• Polish• Serbo-Croatian• Armenian• Persian• Gujarati• Hindi• Urdu• Other Indo-European languages | 4. Other languages |
| | <ul style="list-style-type: none">• Navajo• Hungarian• Arabic• Hebrew• African languages• Other and unspecified language |

Table C1 shows City-wide estimates for the number of residents ages five and older who speak languages in each of the named categories. Figures C1-C4 show the share of residents ages five and older who speak languages in each of these categories, by Census Tract.

¹ Residents who speak another language at home may be proficient in English. Separate statistics are available to identify residents who have Limited English Proficiency (LEP) if needed.

Table C1. Alexandria residents over age 5, by language spoken at home

Language	Estimate	Margin of error	Share of the population
Spanish	21,112	+/- 677	14 percent
Other Indo-European Languages	9,172	+/- 993	6 percent
Asian and Pacific Island Languages	4,980	+/- 571	3 percent
Other languages	13,841	+/- 1,445	10 percent

Source: 2015-2019 ACS 5-year estimates

Public Use Microdata Sample reports ACS data by individual and household and can be used to identify more detailed statistics at the City-level. Table 2 shows City-wide estimates for the top five languages, other than English, spoken at home.

Table C2. Alexandria residents over age 5, top 10 languages other than English

Language	Estimate	Limited English Proficiency	% of City Pop	% Limited English Proficiency
Spanish	21,160	10,065	13%	48%
Ethiopian Languages	8,726	2,945	6%	34%
Arabic	3,462	1,241	2%	36%
French Languages	2,781	236	2%	8%
Indo-Aryan Languages	2,017	524	1%	26%
Iranian Languages	1,641	798	1%	49%
Niger-Congo Languages	1,485	211	1%	14%
Chinese Languages	1,380	440	1%	32%
Filipino Languages	1,128	68	1%	6%
Korean	835	393	1%	47%

Source: 2015-2019 Public Use Microdata Sample (PUMS) 5-year estimates

Figure C1. Residents ages 5 and older who speak Spanish at home



Figure C2. Residents ages 5 and older who speak an Indo-European language other than Spanish at home

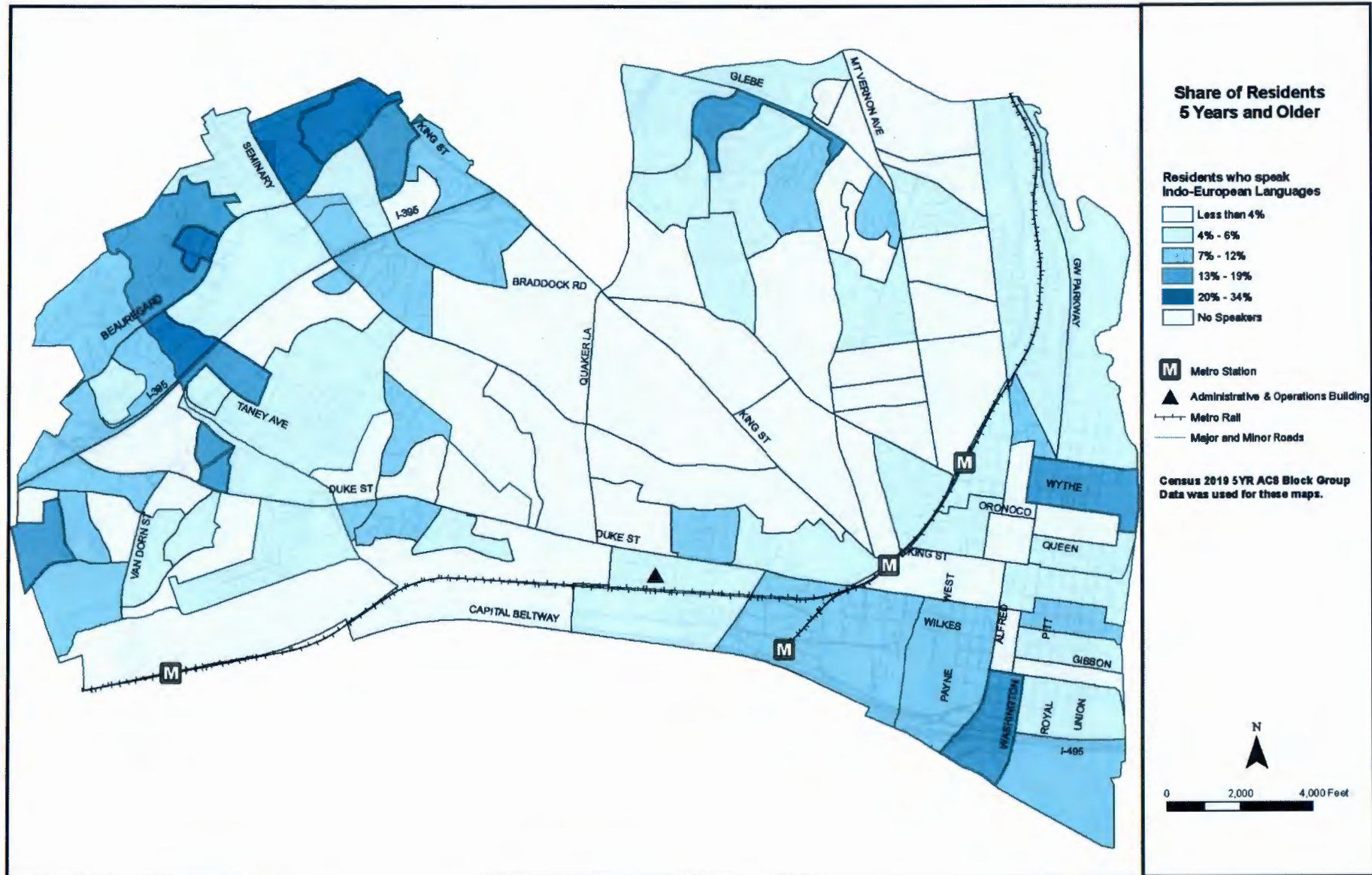


Figure C3. Residents ages 5 and older who speak an Asian or Pacific Island language at home

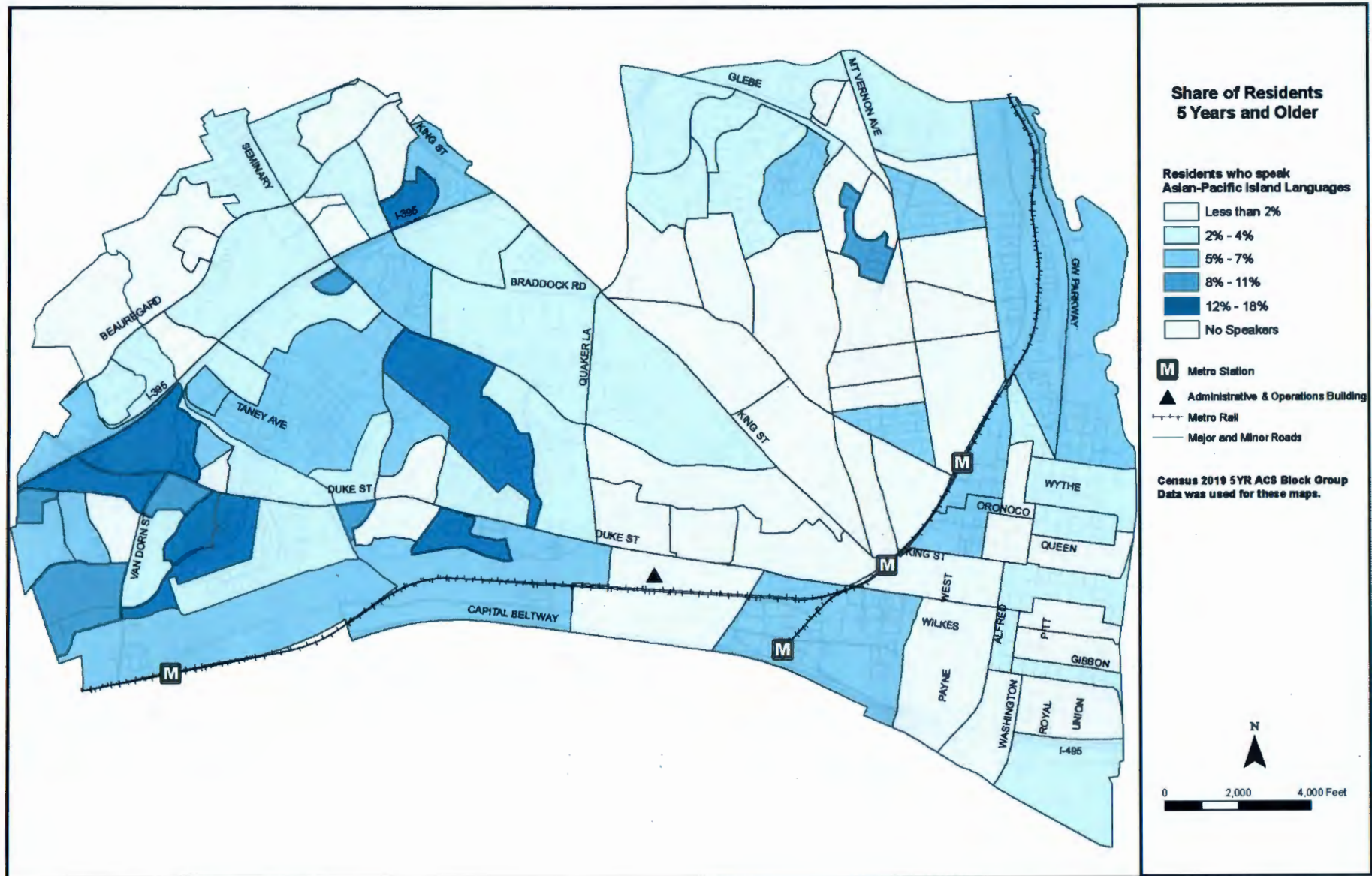
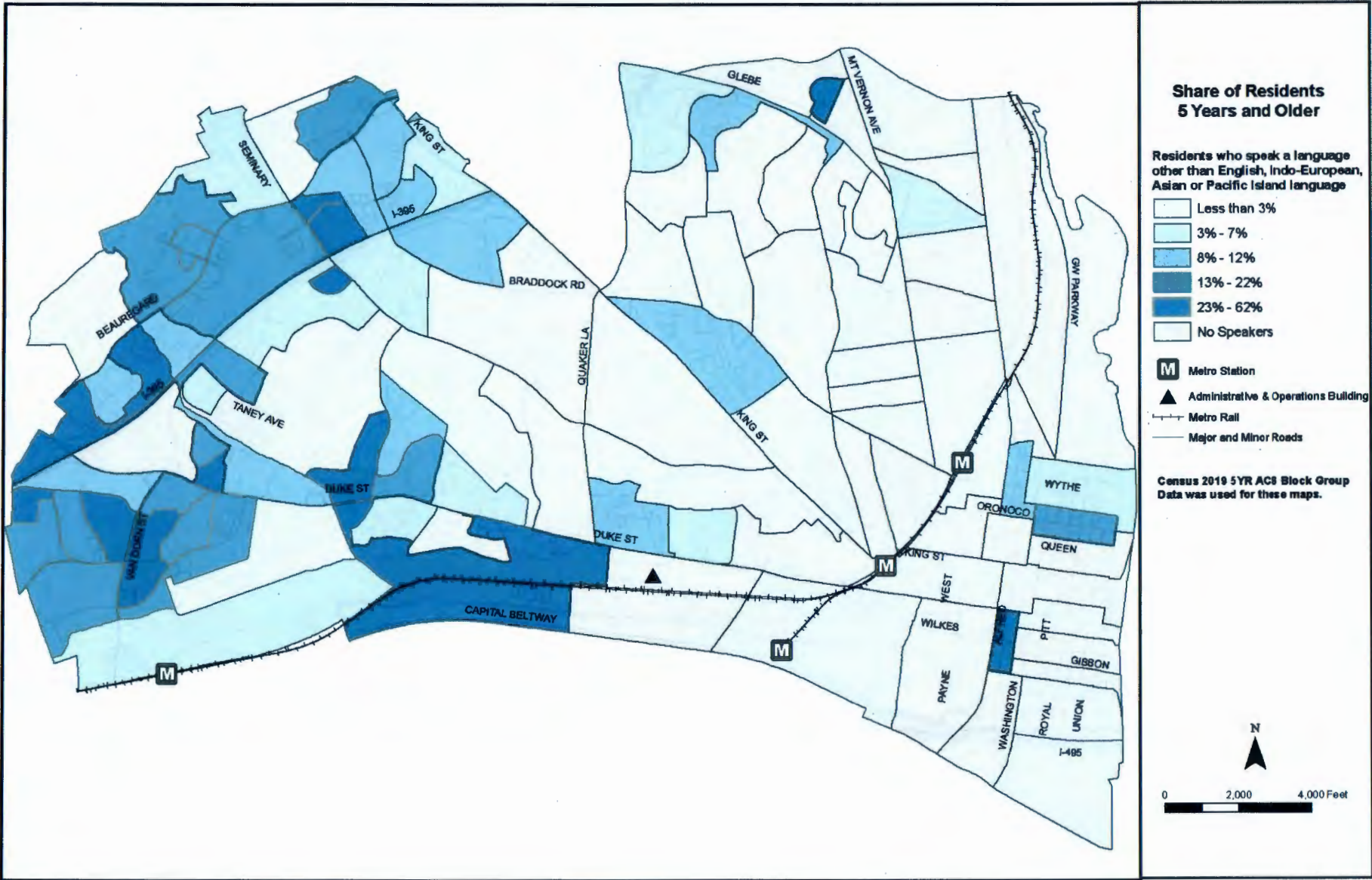


Figure C4. Residents aged 5 and older who speak a language other than English, Indo-European, Asian or Pacific Island languages at home



Appendix D: Demographic Maps - Percentages of Ethnic Groups by Census Tracts in Alexandria

Race and Ethnicity

About 22 percent of Alexandria's residents identify as non-Hispanic Black or African American, and nearly 17 percent identify as Hispanic of any race.

Figures D1 and D2 show these statistics at the Census Tract-level, respectively.

Figure D1. Share of residents who are non-Hispanic Black or African American

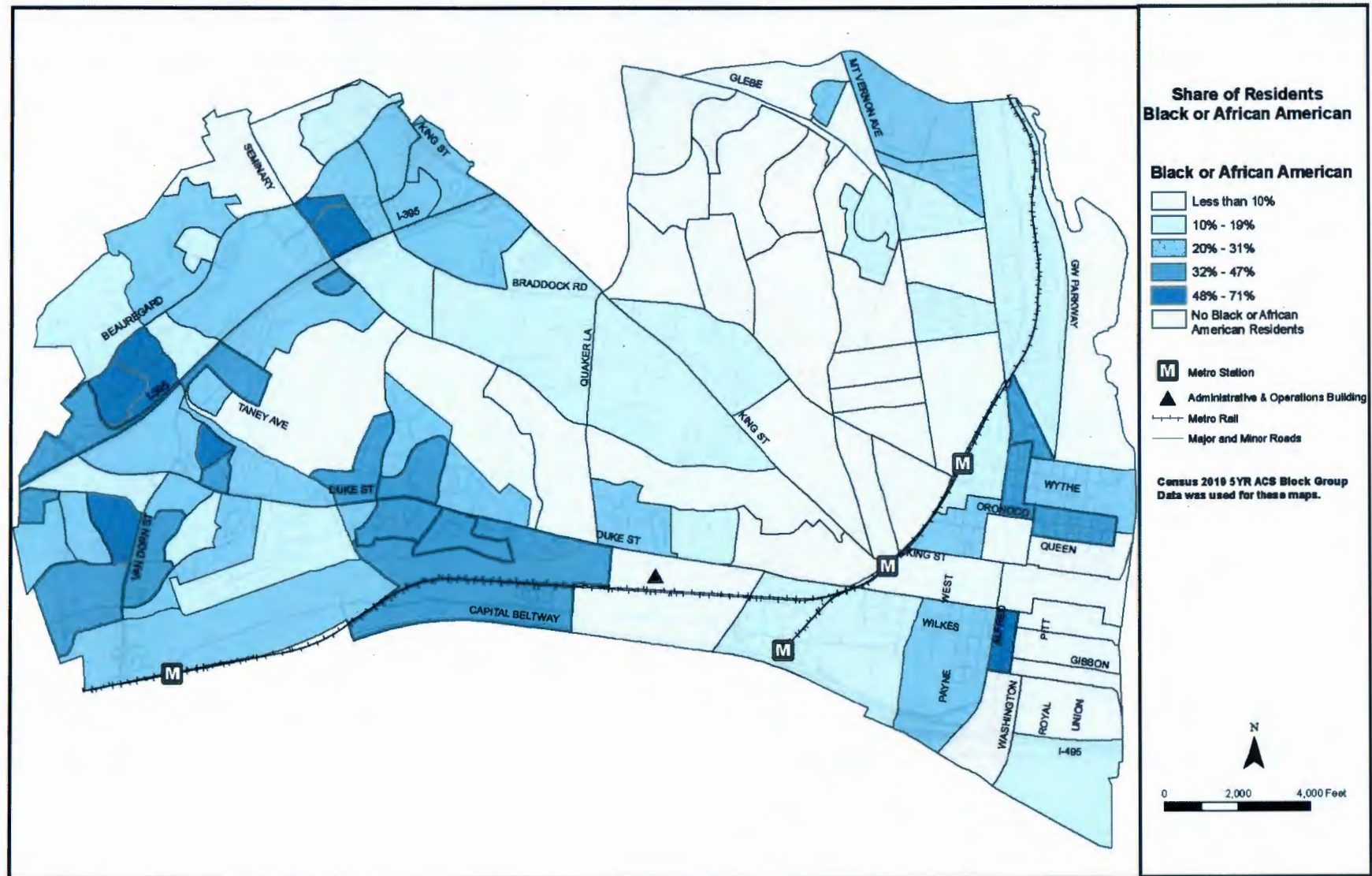


Figure D2. Share of residents who are Hispanic (of any race)



Appendix E: The City of Alexandria's Language Access Policy

- Policy:** All City departments, including the Alexandria Transit Company (ATC) 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. ATC/DASH also have two individuals in the Department of Planning & Marketing that help support LEP-related efforts in outreach and communications.

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/they are not able to speak, read, write or understand the English language to the extent that allows him/her/them 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/they do 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.

1.0 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 LEP person makes use of another form of language assistance. Accurate documentation is especially important for direct service staff. If the LEP person has been offered free interpretive services and chooses to utilize their own interpreter, i.e. friend, family member or community member, the 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 LEP person) but will not exceed the period of one year. Staff should never require, suggest, or encourage a 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.

2.0 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 speaks 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.

3.0 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 native or preferred 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.