

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 sub recipient of both the Northern Virginia Transportation Commission ("NVTC") and of the Metropolitan Washington Council of Governments ("MWCOC"). The FTA funded transit projects performed by the City include studies, new infrastructure, or 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 U.S. Department of Transportation ("DOT") Title VI regulations (49 CFR part 21) and to integrate into their programs and activities elements of the DOT Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficiency ("LEP") Persons (70 FR 74087, December 14, 2005).

FTA Circular 4702.1B 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. Since the City is a subrecipient of NVTC, the City submits its Title VI program to NVTC for incorporation into its Title VI program.

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

Assurance of Compliance

Under Title VI, 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. In addition, it is the policy of the City of Alexandria not to discriminate against any employee because of marital status or sexual orientation.

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 fulfills 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 sub recipient 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 notice states further that the City will translate it into other languages on request.

This notice was 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 use the complaint form attached in Appendix B to catalogue any complaints received by the Office of Human Rights.

4.0 Title VI Investigations, Complaints, and Lawsuits

The City of Alexandria has had no Title VI complaints since its last submittal in 2016. No Title VI complaints had been filed prior to 2016.

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 to 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 are 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.

- 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.
- 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 present.
- Employing the City's general website and the City's GoAlex website to provide announcements of public meetings and to provide information to the general public about issues which were raised at the meetings. In addition, the City announces meetings using the eNews service and social media where appropriate.
- 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, 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. The City also provides people with disabilities with opportunities to fill out surveys. For example, when we conducted one of the Alexandria Transit Vision surveys, there was a Section 508 compliant survey on the webpage for with those with visual impediments.
- 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 may be are picked up by the Washington Post and local newspapers.
- 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.
- City Council meetings.
- Web proceedings from City Council meetings.
- Sometimes providing 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 cost 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 2013-2017 Public Use Microdata Sample (PUMS) conducted by the U.S. Census were used. According to these figures, 120,110 residents (77.6% of the population) speak English only. The most common language other than English is Spanish, which is the primary language of 20,800 residents (13.2% of the population). Other Indo-European languages are used by 2,000 residents (1.0% of the population). Asian and Pacific Islanders languages are spoken at home by 1,400 residents (1.0% of the population). People speaking other languages, such as Amharic or Arabic, constitute 7.0 % of the City's population (10,400 residents).

Appendix C shows the census tract maps that indicate where the four major groups of languages most spoken at home other than English. 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.

For specific projects, the City or its contractor perform a demographic analysis of the service area impacted by the project. For example, the City reviewed 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, 8,516 residents (50.2% of those speaking Spanish at home) stated that they can speak English less than very well. For those in Zip Code 22311, 1,131 residents (or 49.3% of those speaking Spanish at home) 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 of 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% (578 residents in Zip Code 22311 and 4,664 residents in the City as a whole). Based on this data, the

City developed a public outreach plan that included methods to actively solicit the input of LEP people.

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'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. The City will continue to reach out to this important group in providing transit services and facilities which can improve their travel experience.

During the past few years, the City has been engaged in two projects to determine its transit system for the future or to construct a key transit improvement. The first of these is the Transit Vision Study, which started in 2018 and is expected to be finished in 2019. This is an effort that is reviewing the City's transit network and determining updates to routing and service. This study encompasses the entire City and is obtaining public input through many channels. These include distributing materials in both English and Spanish at a variety of locations where large groups of transit patrons are likely to congregate, holding public meetings across the city, and administering automated surveys in different languages. The full community participation effort will occur again to gain input on the draft final recommendation before the final outcome is determined.

The second effort in the City is a project to rebuild access facilities at the King Street-Old Town Metrorail station, the largest transit facility in the City. Prior to the construction, the City was engaged in an extensive effort to involve residents in the design of the facility. After the design was determined, the City participated in a public engagement effort for the upcoming construction. The City published a brochure in English, Spanish, and Amharic, the three predominant language groups in the City, which explains to people when the construction will begin, the impacts to customers, and the final outcome. The City assembled a multilingual team that passed out the brochure weeks before the start of construction and after construction commenced. The City also worked to notify all shuttle bus operators and taxi cab operators of this construction and tried to minimize any adverse impacts. The City published materials that described the construction and placed the material on buses and used other media outlets to distribute the information. Since this work will occur in two primary phases, the City expects to conduct a similar effort when phase 2 begins.

The City will make an effort to ensure that important projects which 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 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 in order to fully provide them with all City services. In response to these findings, the City developed its Language Assistance plan in 2003 which 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. The City invested over \$55,000 in language interpretation in FY2018.

7.0 Analysis of Non-Elected Transportation Boards and Commissions Appointed in Alexandria

The City of Alexandria has had three city commissions or advisory groups which deal with transit issues. These are the Transportation Commission, the Potomac Yard Metrorail Implementation Work Group, and the Alexandria Transit Company Board of Directors. 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	2	2	0	11
Potomac Yard Metrorail Implementation Work Group	12	1	1	0	14
Alexandria Transit Company Board of Directors	7	2	0	0	9

The Transportation Commission helps the City Council develop transportation policies. The Transportation Commission has two African-American representatives. The Transportation Commission also has two Hispanic representatives. 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 widely publicized in various local and city media. 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 Alexandria Transit Company is governed by a nine-member Board of Directors that is elected annually by the Alexandria City Council, acting in the capacity of the sole stockholders. Board members include residents and City staff appointed by the City Manager. Two members of the ATC Board are African-Americans.

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 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.

The City's proposed budget for FY 2020 contains two new positions aimed in part at increasing the participation of LEP communities in City planning and decision making. These two positions are the addition of a Racial and Social Equity Officer in the City Manager's Office, and the addition of an outreach position in the Neighborhood Planning Division of the City government. The City is also currently reviewing its practices in regard to the provision of information in languages other than English and is also reinforcing the availability of language line services for callers or for face-to-face contact with residents.

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 City operators and does not currently accept FTA capital and operating funds. Nevertheless, the City has performed demographic analyses during the planning stages of **FTA Funded Projects** in Alexandria and projects for which the City is applying for federal funding, including the Crystal City-Potomac Yard Transitway (completed), the Potomac Yard Metrorail Station, the West End Transitway, and the King Street Old Town Metrorail Access Improvements. This demographic analysis helped to guide outreach strategies by identifying populations who might require additional outreach.

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://alexandriava.gov> 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 antidiscriminatorias 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: <http://alexandriava.gov> 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 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**

March 12, 2019

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 _____

Section III

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.]

Section IV

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: Office of Human Rights, City of Alexandria, and 421 King Street, Suite 230, Alexandria, VA 22314

Alternative formats of this form can be made available by request: jean.kelleher@alexandriava.gov: Phone: 703-746-3140 or please use the free Virginia Relay System at 7-1-1. Please allow seven (7) working days for preparation of the material.

Apéndice B

INSTRUCCIONES PARA PRESENTAR UNA QUEJA Y FORMULARIO DE QUEJA

Procedimientos

1. Toda persona, grupo de personas o entidades que crean que han sido objeto de un acto discriminatorio prohibido en los procedimientos sobre no discriminación del Título VI, podrán presentar una queja por escrito ante el Oficial del Título VI de la Ciudad de Alexandria. La queja formal tiene que ser presentada dentro de los 180 días calendarios siguientes a la supuesta ocurrencia, o cuando el demandante se enteró de la supuesta discriminación. La queja tiene que cumplir los requisitos siguientes:
 - a. La queja tiene que: estar por escrito y firmada por el demandante o demandantes.
 - b. Incluir la fecha del presunto acto discriminatorio (fecha en que el demandante o demandantes se enteraron de la supuesta discriminación; o la fecha en que se discontinuó esa conducta o la última vez que ocurrió.)
 - c. Presentar una descripción detallada de los actos, incluyendo los nombres y títulos de cargos ocupados por las personas de las que se percibió que fueron partes del incidente objeto de la queja.
 - d. Se acusará recibo de las acusaciones enviadas por fax o correo electrónico, y se procesarán una vez que se haya(n) establecido la(s) identidad(es) del demandante o demandantes y su intención de seguir adelante con la queja. Para esto, el demandante tiene que enviar por correo una copia original firmada del fax o correo electrónico, para que el Consejo de Gobiernos (COG) pueda procesarla.
 - e. Las quejas recibidas por teléfono serán anotadas en un registro indicando la hora, fecha y naturaleza de cada queja. A los demandantes se les informará que presenten la queja por escrito, para lo cual serán dirigidos al sitio Web para obtener plantillas que sugieren el formulario para la queja.
2. Una vez recibida la queja, el Oficial del Título VI la enviará al Procurador de la Ciudad, quien determinará su jurisdicción, aceptabilidad y si se necesita más información, además de investigar los méritos de la misma. Las quejas contra la Ciudad de Alexandria serán remitidas por el Procurador de la Ciudad a las agencias estatales o federales correspondientes para su debido procesamiento conforme a sus procedimientos. En casos especiales que justifiquen una intervención para asegurar equidad, estas agencias podrán asumir jurisdicción, o bien completar u obtener servicios para examinar o investigar los hechos.

3. Para que sea aceptada, una queja tiene que cumplir los criterios siguientes:
 - a. La queja tiene que ser presentada dentro de los 180 días calendarios siguientes a la presunta ocurrencia, o cuando el demandante se enteró de la supuesta discriminación.
 - b. La acusación o acusaciones tienen que referirse a un hecho previsto en la ley, tal como raza, color, nacionalidad, género, discapacidad o represalia.
 - c. La acusación o acusaciones tienen que estar relacionadas con un programa o actividad de un beneficiario o sub-beneficiario de ayuda federal, o contratista, o en el caso de acusaciones relacionadas con la Ley de Americanos con Discapacidades (ADA), una entidad abierta al público.
 - d. El demandante o demandantes tienen que aceptar una resolución razonable basada en la autoridad administrativa de la Ciudad (la calidad de razonable será determinada por Alexandria).
4. Una queja podrá ser rechazada por las razones siguientes:
 - a. El demandante solicita la retirada de la queja.
 - b. El demandante no responde a repetidas solicitudes de información adicional necesaria para procesar la queja.
 - c. No se puede localizar al demandante después de varios intentos razonables.
5. Una vez que Alexandria o una agencia estatal o federal decidan aceptar la queja e investigarla, el demandante y el demandado serán notificados por escrito de dicha determinación en el plazo de cinco días calendarios. A la queja se le asignará un número de caso y luego será asentada en los registros de Alexandria o de la agencia a donde fue enviada para identificar su fundamento y el supuesto perjuicio ocasionado, así como la raza, color, nacionalidad y género del reclamante.
6. En los casos en que Alexandria asuma la investigación de la queja, la Ciudad brindará al demandado la oportunidad de responder por escrito a las acusaciones. El demandado tendrá diez (10) días calendarios a partir de la notificación escrita de Alexandria de haber aceptado la queja, para responder a las acusaciones.
7. En los casos en que Alexandria asuma la investigación de la queja, y dentro de los 40 días calendarios siguientes a la fecha de su aceptación, el Procurador de la Ciudad, con la asistencia del correspondiente Coordinador del Título VI, preparará un informe de la investigación para que lo examine el Administrador de la Ciudad. Este informe incluirá una descripción narrativa del incidente, la identidad de las personas entrevistadas, los resultados y recomendaciones para su disposición.
8. El Procurador de la Ciudad y el Coordinador correspondiente del Título VI discutirán el informe y recomendaciones con el Administrador de la Ciudad dentro de un plazo de diez días calendarios. El informe será enmendado en la medida necesaria y se redactará en forma final para su publicación.

9. El informe final de la investigación realizada por Alexandria, junto con una copia de la queja, serán enviados a la agencia estatal correspondiente dentro de los 60 días calendarios siguientes a la aceptación de la queja.
10. Alexandria notificará a las partes sus conclusiones preliminares, las cuales podrán estar sujetas al acuerdo de la agencia estatal correspondiente.
11. En cuanto una agencia del Estado emita su decisión final, Alexandria notificará esa determinación a todas las partes involucradas. Las determinaciones del Estado no están sujetas a apelación.

Ciudad de Alexandria
Formulario de Quejas sobre el Título VI

12 marzo 2019

Nombre: _____

Dirección: _____

Números de teléfono:

(Casa) _____ (Trabajo) _____

Dirección de correo electrónico: _____

¿Requisitos de formato accesible?

Letra de imprenta grande _____ Cinta de audio _____

Dispositivo telefónico para sordos (TDD) _____ Otro _____

¿Está usted presentando esta queja en su propio nombre?

Sí _____ No _____

[Si contestó que "sí" a esta pregunta, pase a la Sección III.]

Si contesta que no, por favor dé el nombre y relación de la persona por quien usted está presentando la queja: _____

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

Sección III

Si está presentando la queja en nombre de un tercero, ¿ha obtenido el permiso de la parte agraviada?

Sí _____ No _____

¿Ha presentado esta queja ante cualquier otra agencia federal, estatal o local, o ante cualquier tribunal federal o estatal?

Sí _____ No _____

Si contestó que sí, por favor indique cuál:

Agencia federal _____

Agencia estatal _____

Agencia local _____

Tribunal federal _____

¿Ha presentado usted una demanda sobre esta queja? Sí _____ No _____

Si contestó que "sí" a cualquiera de las dos preguntas anteriores, por favor proporcione una copia del formulario de queja o demanda.

[Nota: La información arriba mencionada es útil para los fines de seguimiento administrativo. No obstante, si está pendiente un pleito sobre los mismos problemas, deferiremos nuestra decisión a la del tribunal, y Alexandria no tomará ninguna acción al respecto.]

Sección IV

Nombre de la oficina o departamento que usted cree que discriminó contra usted:

Oficina o Departamento _____

Nombre de la persona (si procede) _____

Dirección _____

Ciudad _____ Estado _____ Código postal _____

Teléfono _____

Base(s) de la queja. Marque todas las que correspondan:

☐ Raza ☐ Color ☐ Nacionalidad

Haga el favor de describir su queja en horas separadas. Usted deberá incluir detalles específicos, tales como nombres, fechas, horas, testigos y cualquier otra información que nos ayude en nuestra investigación de sus acusaciones. Sírvase también proporcionar cualquier otra documentación pertinente a esta queja.

Favor de firmar aquí: _____

Fecha: _____

[Nota – No podemos aceptar su queja sin una firma.]

Usted puede adjuntar cualquier material escrito u otra información que considere que es importante para su queja.

Por favor envíe su formulario debidamente llenado a: Office of Human Rights, City of Alexandria, 421 King Street, Suite 230, Alexandria, VA 22314

Puede obtener otros formatos diferentes a este solicitándolos a: jean.kelleher@alexandriava.gov. Teléfono: 703-746-3140 o por favor use el sistema gratuito de relevos de Virginia (Virginia Relay System) en el 7-1-1. La preparación de estos materiales tomará siete (7) días hábiles.

Appendix C

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

2013-2017 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)
2. Other Indo-European languages
 - French
 - French Creole
 - Italian
 - Portuguese
 - Creole
 - German
 - Yiddish
 - Scandinavian Languages
 - Greek
 - Russian
 - Polish
 - Serbo-Croatian
 - Armenian
 - Persian
 - Gujarati
 - Hindi
 - Urdu
 - Other Indo-European languages
3. Asian and Pacific Island Languages
 - Chinese
 - Japanese
 - Mon-Khmer (Cambodian)
 - Hmong
 - Thai
 - Laotian
 - Vietnamese
 - Tagalog
 - Other Asian or Pacific Island languages
4. Other languages
 - Navajo
 - Hungarian
 - Arabic
 - Hebrew
 - African languages
 - Other and unspecified language

Table 1 shows City-wide estimates for the number of residents age 5 and older who speak languages in each of these categories. Figures 1-4 show the share of residents age five and older who speak languages in each of these categories, by Census Tract.

9.0 Table 1. Estimated number of Alexandria residents over age 5, by language spoken at home

Language	Estimate	Margin of error	Share of the population
Spanish	20,168	+/- 779	14 percent
Other Indo-European Languages	8,566	+/- 932	6 percent
Asian and Pacific Island Languages	5,123	+/- 434	4 percent

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.

Other languages	13,876	+/- 1,180	10 percent
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Source: 2013-2017 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.

10.0 Table 2. Estimated number of Alexandria residents over age 5, top 5 languages

Language	Estimate	Share of the population
Spanish	20,800	14 percent
Amharic	7,600	5 percent
Arabic	2,800	2 percent
French	2,000	1 percent
Tagalog	1,400	1 percent

Source: 2013-2017 Public Use Microdata Sample (PUMS) 5-year estimates

Figure 1. Residents age 5 and older who speak Spanish at home

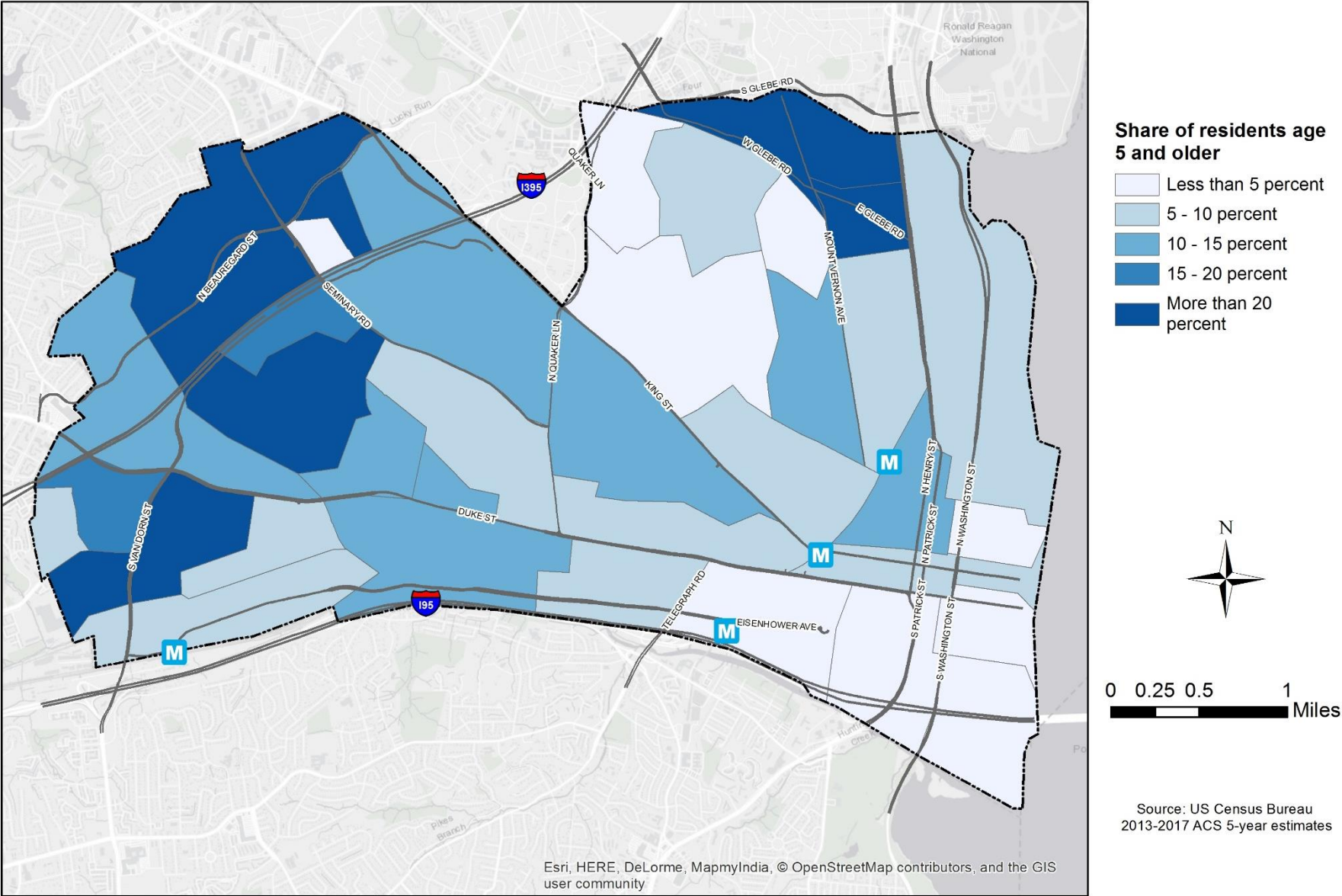


Figure 2. Residents age 5 and older who speak an Indo-European language other than Spanish at home

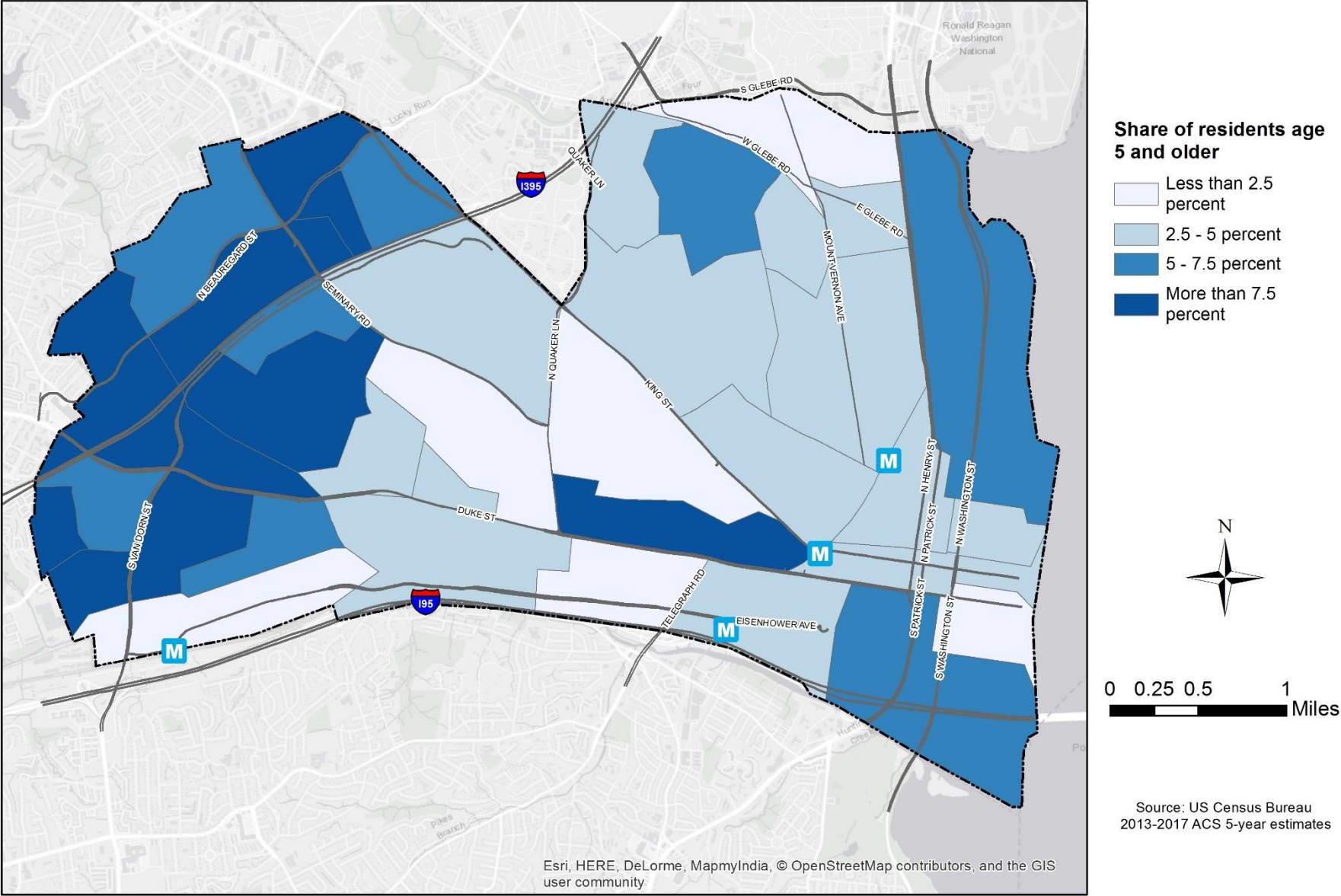


Figure 3. Residents age 5 and older who speak an Asian or Pacific Island language at home

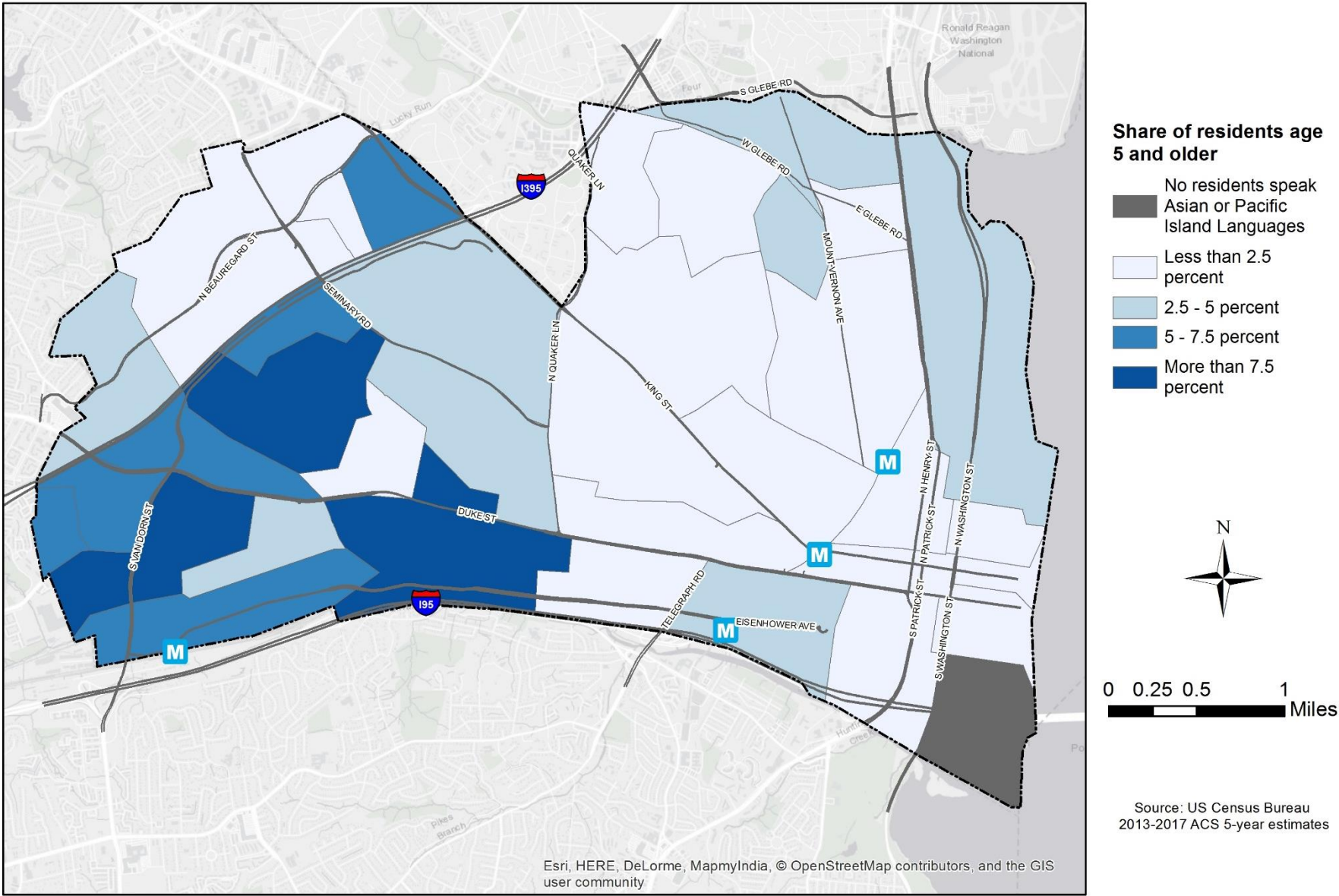
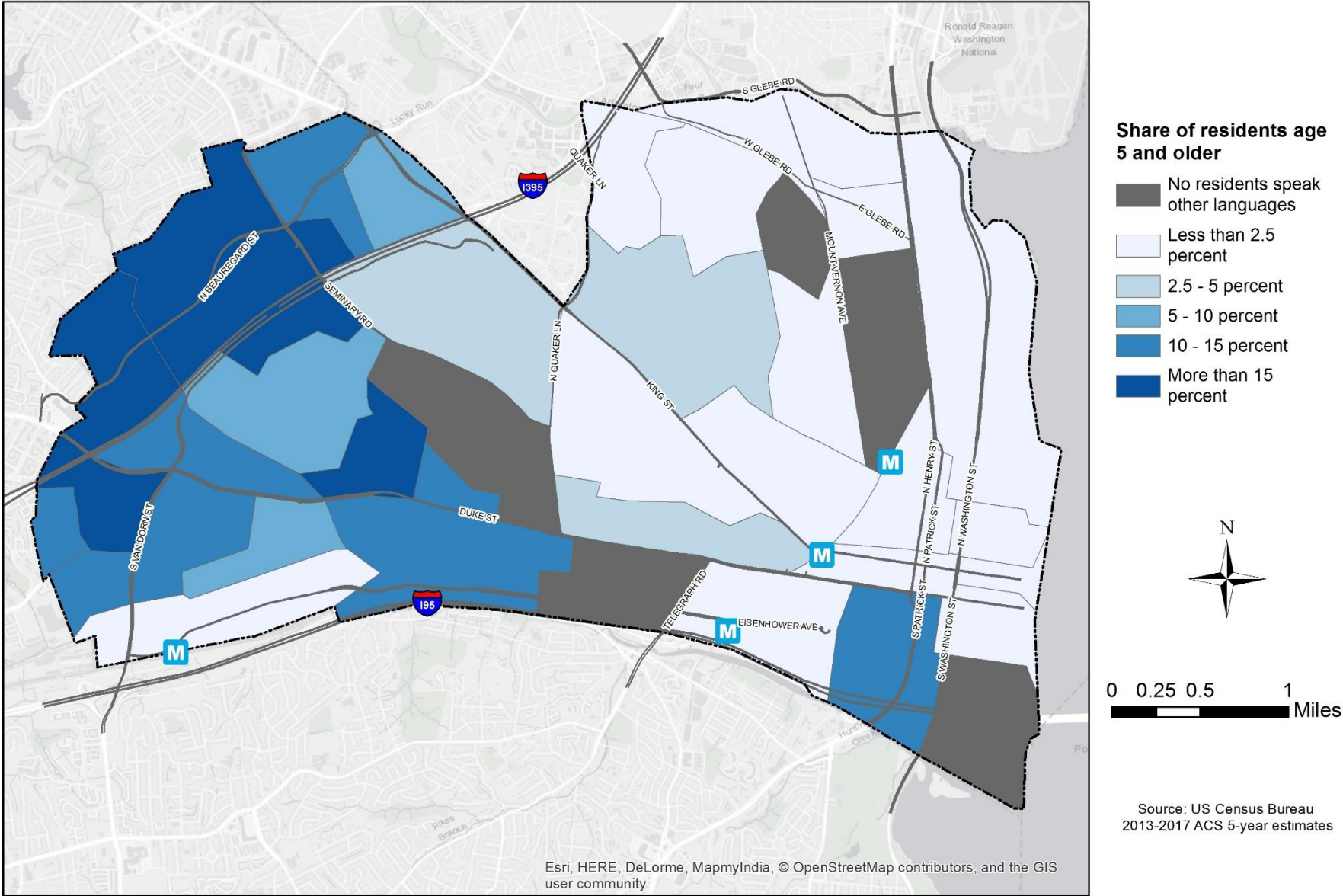


Figure 4. Residents age 5 and older who speak a language other than English, Indo-European, Asian or Pacific Island languages at home



Appendix D

Percentages of Ethnic Groups by Census Tracts in Alexandria

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 5 and 6 shows these statistics at the Census Tract-level, respectively.

Figure 5. Share of residents who are non-Hispanic Black or African American

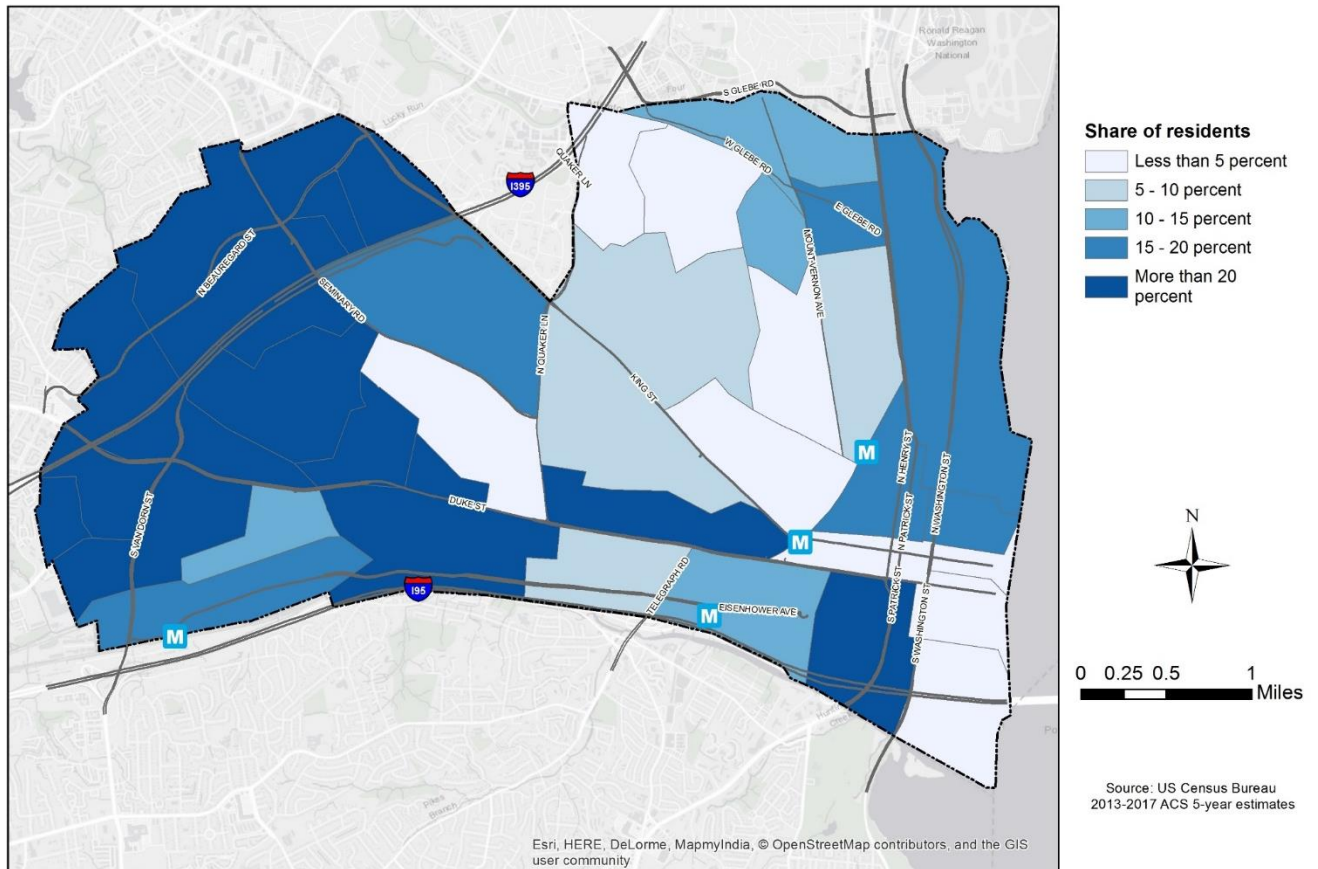
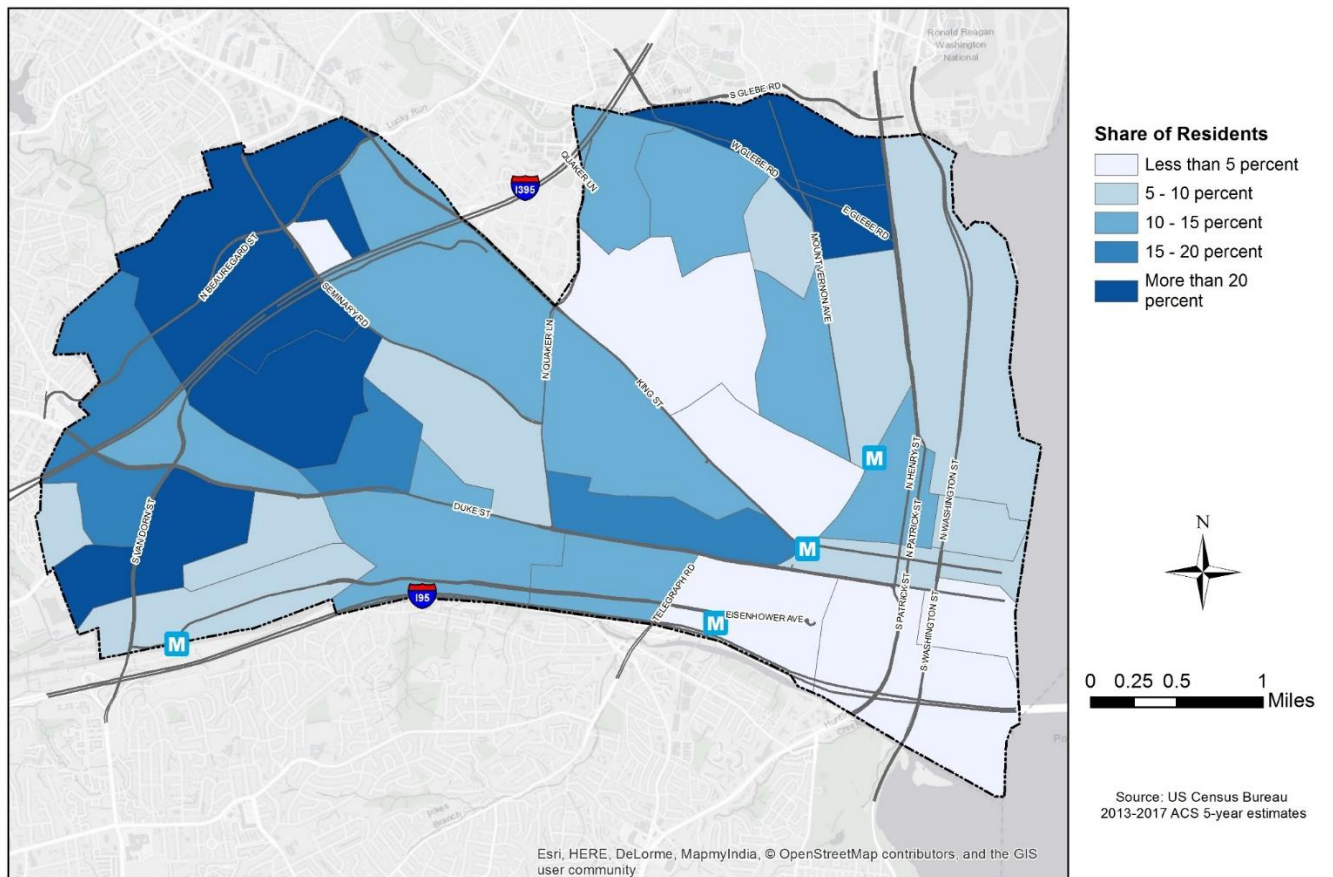


Figure 6. Share of residents who are Hispanic (of any race)



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 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 resident's 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, staffs 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 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.

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 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.