

Instructions for Compliance with Civil Rights Title VI

The Department for Local Government (DLG) has and will continue to take a proactive approach to fully implement procedures to eliminate discrimination on the basis of race, color or national origin.

In accordance with KRS 344.015, DLG developed a Title VI Implementation Plan. All organizations that receive pass-through federal funding from DLG must comply with this Implementation Plan. To ensure that DLG meets its compliance responsibility, procedures have been established to provide monitoring of Title VI compliance activities and complaint processing in all programs.

To meet the requirements of compliance, your organization has two options. Your organization can adopt the plan created by DLG. To ensure full compliance with DLG's Implementation Plan, the following items **MUST** be retained by the subrecipient with your completed Civil Rights Title VI Self-Survey:

- Nondiscrimination Policy
- Compliance Assurance, including:
 - A copy of all contracts used to provide direct services to client, and.
 - A copy of all contracts used to assure that subcontractor or vendors are clearly aware of your agency's commitment to Title VI.

NOTE: Please ensure that a local Title VI coordinator is identified in question 5 of the Self-Survey.

In addition to the Self-Survey, your agency must complete the enclosed Statement of Assurance. Full compliance cannot be achieved unless all of these items are included.

Though most organizations have chosen to adopt the DLG plan, your organization may create its own Title VI implementation plan and submit it to DLG for approval. The standards for preparing a Title VI Implementation Plan are provided in 45 KAR 1:080. Regardless of which option your organization chooses, you must maintain a copy of Title VI documents for review by the general public and DLG, HUD or its representatives.

If you have questions about Title VI or completing the required documentation, you may contact DLG at 1.800.346.5606.

CIVIL RIGHTS TITLE VI SELF-SURVEY

1. Date of Survey: _____

2. Type of Survey: Initial Update Other: _____

3. Name of Facility/Agency: _____
 Street Address: _____
 City, State, Zip: _____
 County: _____

4. Administrative Head: _____
 Title: _____

5. Name of Local Title VI Coordinator: _____
 Street Address: _____
 City, State, Zip: _____
 Phone Number: _____

6. Advisory Group or Advisory Board:
 - a. What is the racial composition of the advisory group or advisory board?
 Total: _____ Number of white: _____ Number of non-white: _____
 - b. How are members selected?

 - c. What is the length of the term for members that serve on the advisory group or board?

7. Nondiscrimination Policies: Does your Agency have a written policy stating that services will be provided to all persons without regard to race, color, national origin sexual orientation, gender identity or marital status?

Yes No

If yes, attach a copy (**FOR INITIAL SURVEY ONLY**).

8. Posters: Are posters containing Title VI information prominently displayed within the facility?

Yes No

a. Do these posters show the name of the Local Coordinator to whom complaints should be referred?

Yes No

9. Records: Are permanent records kept of all Title VI complaints?

Yes No

10. Complaints: If applicable, describe below any complaints received in this reporting period:

Name of Complainant	Race	Charge	Findings

11. Dissemination: Is Title VI disseminated to your employees and your clients/grantees?

Yes No

If yes, describe how employees are informed:

a. Are you confident that grantees and clients are clearly aware of their rights under Title VI, including the right to file a complaint?

Yes No

b. Are new employees clearly informed about their specific responsibilities to clients under Title VI?

Yes No

c. Are staff members periodically reoriented or refreshed on information detailing their Title VI responsibilities?

Yes No

If yes, state by whom and how:

12. Compliance Assurance: Do all contracts that provide direct services to clients contain a Title VI statement of compliance?

Yes No

If yes, attach a copy of the Title VI statement included in such contract (***FOR INITIAL SURVEY ONLY***).

13. Are you confident that each of your subcontractors or vendors, if any, is clearly aware of your agency's commitment to Title VI?

Yes No

If yes, attach a copy of information used to ensure subcontractors or vendors are aware of your agency's commitment to Title VI (***FOR INITIAL SURVEY ONLY***).

14. Are all physical areas (i.e., exits, waiting rooms, dining areas, restrooms, etc.) provided and used without regard to the race, color or national origin of clients?

Yes No

If no, identify the areas that are not used jointly and explain why: _____

TITLE VI - STATEMENT OF ASSURANCE

Name of Subrecipient

HEREBY AGREES THAT it will comply with Title VI of the Civil Rights Act of 1964 (P.L. 88-352) and all requirements imposed by the Regulations of the U.S. Department of Housing and Urban Development, Department of Justice (28 CFR Parts 42 and 50), Kentucky Department for Local Government (DLG), and any requirements or directives issued pursuant to that Act and the Regulations of DLG, to the effect that, no person in the United States shall, on the ground of race, color, national origin sexual orientation, gender identity or marital status, be excluded from participation in, be denied the benefits of, or be otherwise subject to discrimination under any program or activity for which the Subrecipient received Federal financial assistance from DLG; and **HEREBY GIVES ASSURANCE THAT** it will immediately take any measures necessary to effectuate this agreement.

THIS ASSURANCE is given in consideration of and for the purpose of obtaining any and all Federal financial assistance, grants and loans of Federal funds, reimbursable expenditures, grants or donations of Federal property and interest in property, details of Federal personnel, the sale and lease of and the permission to use Federal property or interest in such property or the furnishing of services without consideration or at nominal consideration, or at a consideration which is reduced for the purpose of assisting the Subrecipient, or in recognition of the public interest to be served by such sale, lease, or furnishing of services to the Subrecipient, or any improvements made with federal financial assistance extended to the Subrecipient by DLG.

BY ACCEPTING THIS ASSURANCE, the Subrecipient agrees to compile data, maintain records and submit reports as required to permit effective enforcement of Title VI, and permit authorized DLG personnel during normal working hours to review and copy such records, books and accounts as needed to ascertain compliance with Title VI. If there are any violations of this assurance, DLG shall have the right to seek administrative and/or judicial enforcement of this assurance and suspend future assistance.

This assurance is binding on the Subrecipient, its successors, transferees and assignees as long as it receives assistance from DLG. In the case of real property, this assurance is binding for as long as the property is used for a purpose for which this assistance was intended. In the case of personal property, this assurance applies for as long as the Subrecipient retains ownership or possession of the property. The person or persons whose signatures appear below are authorized to sign this assurance on the behalf of the Subrecipient.

Signature of Subrecipient's Authorized Representative

Date

Title of Authorized Representative

Subrecipient's Address:

No other funds or benefits may be disbursed under these programs unless this assurance is completed and filed as required by existing regulations.