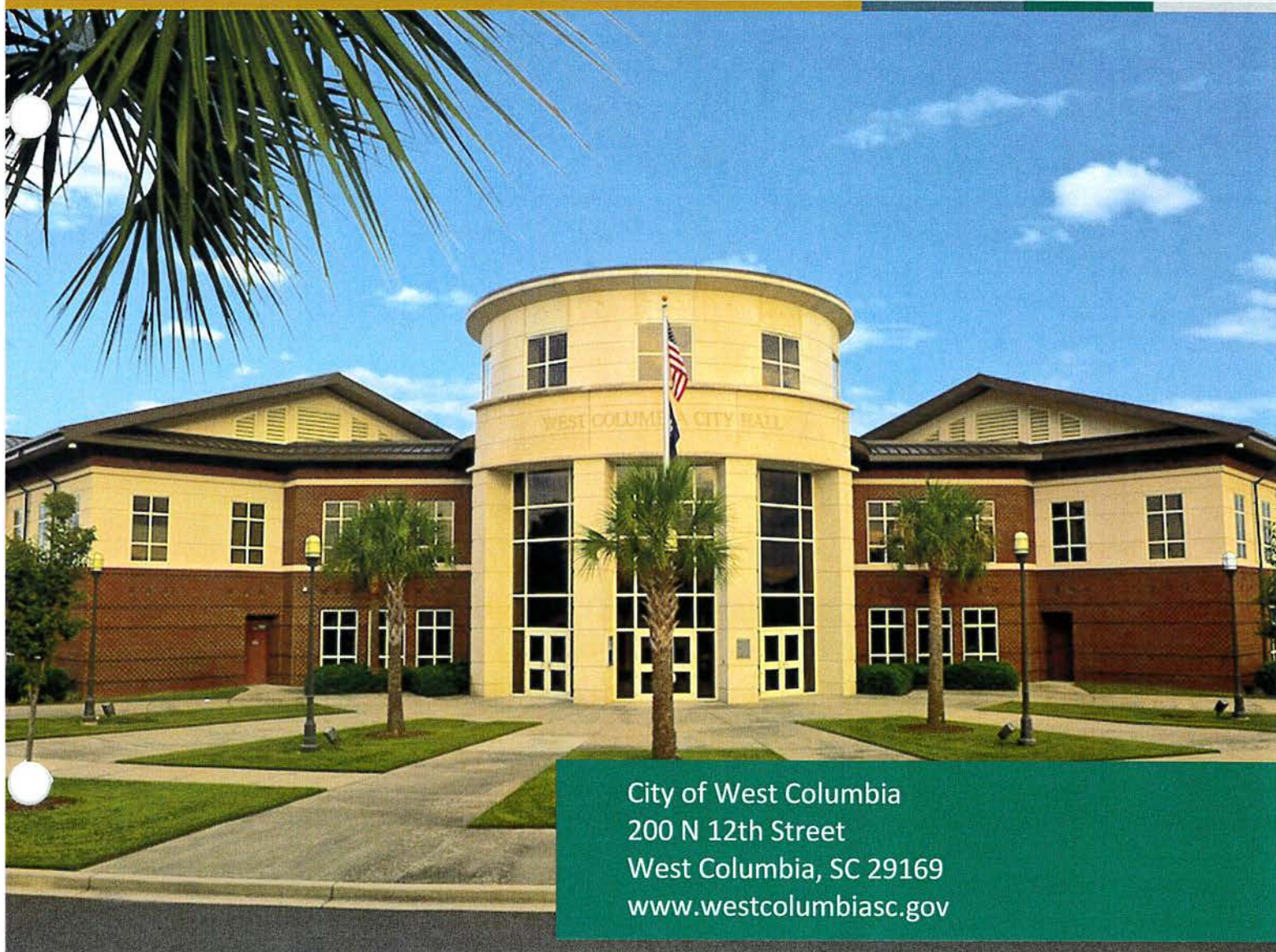




City of West Columbia
Bridging Past, Present and Future

TITLE VI and LEP PLAN

August 2019



City of West Columbia
200 N 12th Street
West Columbia, SC 29169
www.westcolumbiasc.gov

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Title VI – Nondiscrimination in Federally Assisted Programs
Civil Rights Act of 1964
42 USC 2000(d)2000(d)(l)

General

This title declares it to be the policy of the United States that discrimination on the grounds of race, color or national origin shall not occur in connection with programs and activities receiving federal financial assistance and authorizes and directs the appropriate federal departments and agencies to take action to carry out this policy. This title is not intended to apply to foreign assistance programs.

Section 601 – states the general principle that no person in the United States shall be excluded from participation in or otherwise discriminated against on the grounds of race, color, or national origin under any program or activity receiving federal financial assistance.

Section 602 – directs each federal agency administering a program of federal financial assistance by way of grant, contract, or loan to take action pursuant to rule, regulation, or order of general applicability to effectuate the principle of section 601 in a manner consistent with the achievement of the objectives of the statute authorizing the assistance. In seeking the effect compliance with its requirements imposed under this section, an agency is authorized to terminate or to refuse to grant or to continue assistance under a program to any recipient as to whom there has been an express finding pursuant to hearing of a failure to comply with the requirements under that program, and it may also employ any other means authorized by law. However, each agency is directed first to seek compliance with its requirements by voluntary means.

Section 603 – provides that any agency action taken pursuant to section 602 shall be subject to such judicial review as would be available for similar actions by that agency on other grounds. Where the agency action consists of terminating or refusing to grant or to continue financial assistance because of a finding of a failure of the recipient to comply with the agency's judicial review under existing law, judicial review shall nevertheless be available to any person aggrieved as provided in section 10 of the Administrative Procedure Act (5USC 1009). The section also states explicitly that in the latter situation such agency action shall not be deemed committed to unreviewable agency discretion within the meaning of section 10. The purpose of this provision is to obviate the possible argument that although section 603 provides for review in accordance with section 10, section 10 itself has an exception for action "committed to agency discretion," which might otherwise be carried over into section 603. It is not the purpose of this provision of section 603, however, otherwise to alter the scope of judicial review as presently provided in section 10(e) of the Administrative Procedure Act.

Introduction

Title VI prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving federal financial assistance. Specifically, Title VI provides that no person in the United States shall, on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under and program or activity receiving federal financial assistance.

City of West Columbia is the recipient of federal funding through numerous programs and departments. The following is a non-exhaustive list of the granting federal department and program:

1. U.S. Department of Housing and Urban Development
 - a. Community Development Block Grant (CDBG) Program
 - Lexington City Entitlement Community
2. U.S. Department of Justice
 - a. Bulletproof Vest Partnership Program
 - b. Edward Byrne Memorial Justice Assistance Grant (JAG) Program
3. U.S. Department of Transportation
 - a. TAP Grants
 - b. Enhancement Funds

As a recipient of federal grant funding, City of West Columbia is subject to the requirements of Title VI and the information reporting requirements established by the federal government to evaluate the level of compliance concerning the provision of programs and services.

Title VI Plan Policy Statement

The City of West Columbia assures that no person shall, on the grounds of race, color, sex, age, disability, or national origin, as provided by Title VI of the Civil Rights Act of 1964, and the Civil Rights Restoration Act of 1987 (P.L.100.259), be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity. The City of West Columbia further assures that every effort will be made to ensure nondiscrimination in all of its programs or activities, whether these programs and activities are federally funded or not.

In the event that the City of West Columbia contracts to distribute federal aid funds to another entity, Title VI language will be included in all written agreements and the recipient will be monitored for compliance.

The Title VI Coordinator/Director of Grants & Special Projects designated in the Plan is responsible for initiating and monitoring Title VI activities, preparing required reports and other responsibilities required by 23 Code of Federal Regulation (CFR) 200 and 49 Code of Federal Regulation 21.



Brian E. Carter, City Administrator

8/21/19

Date

Authorities

Title VI Civil Rights Act of the 1964 provides that no person in the United States shall, on the grounds of race, color, national origin, income, gender, age, or disability, be excluded from participation in, be denied the benefits of or be otherwise subjected to discrimination under any program or activity receiving federal financial assistance.

The Civil Rights Restoration Act of 1987 broadened the scope of Title VI coverage by expanding the recipients, subrecipients, and contractors, whether such programs and activities are federally assisted or not (Public Law 100259 [2.557] March 22, 1988).

Environmental Justice (EJ) (Executive Order 12898) addresses disproportionate adverse environmental, social and economic impacts that may exist in communities, specifically minority and low-income populations.

Limited English Proficiency (LEP) (Executive Order 13166) addresses access to services for persons whose primary language is not English and who have a limited ability to read, write, speak or understand English.

Americans with Disabilities Act of 1990 (ADA) prohibits discrimination and ensures equal opportunity for persons with disabilities in employment, State and local government services, public accommodations, commercial facilities and transportation.

Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 324) prohibits discrimination based on handicap/disability.

Organization and Staffing – General

The City Administrator is responsible for ensuring the implementation of the City's Title VI Plan. The Title VI Coordinator/Director of Grants & Special Projects, on behalf of the City Administrator, is responsible for the overall management of the Title VI programs, and serves as the, DBE Liaison Officer, and LEP Coordinator. The day-to-day administration of the plan lies with the Title VI Coordinator/Director of Grants & Special Projects (hereafter referred to as "Coordinator") under the direct supervision of the Assistant City Administrator.

Program Administration – General

As Title VI Liaison Officer, the Coordinator shall be responsible for coordinating the overall administration of the Title VI program, plan, and assurances. The Coordinator serves under direct supervision of the City Administrator and is responsible for the program's day-to-day administration.

A. Complaints

If any individual believes that she or he or any other program beneficiaries have been subjected to unequal treatment or discrimination in their receipt of benefits and/or services, or on the grounds of race, color, national origin, sex, disability or age, they may exercise their right to file a complaint with the City of West Columbia. Every effort will be made to resolve complaints informally. Refer to Appendix G for the procedures on how to file a complaint.

B. Data Collection

Statistical data on race, color, national origin and sex of participants in, and beneficiaries of federally funded programs, (e.g., impacted citizens and affected communities), will be gathered and maintained by Director of Grants & Special Projects. The data gathering process will be reviewed regularly to ensure sufficiency of the data in meeting the requirements of the Title VI program administration.

C. Title VI Program Reviews

The City's Title VI Program reviews will be performed by the Coordinator to assess the office's administrative procedures, staffing, and resources available for Title VI compliance. The Coordinator will conduct reviews of contractors, subcontractors, consultants, suppliers and all other subrecipients of City's federal funds to ensure compliance with Title VI provisions.

D. Operational Guidelines/Program Directives

All operational guidelines to contractors, subrecipients, and program planning areas will be reviewed annually to include Title VI language and provisions and related requirements, where applicable.

E. Training Program

Title VI training will be made available at least annually to employees and contractors where applicable. The training will provide comprehensive information on Title VI provisions, application to program operations, and identification of Title VI issues and resolution of complaints. A summary of the training conducted will be maintained in an annual report.

F. Annual Reports

An annual report will be submitted to the City Administrator by the Coordinator. The summary will overview Title VI accomplishments achieved during the year and will also include goals and objectives for the upcoming year where applicable.

G. Title VI Plan Update

The Title VI Plan will be updated as needed.

H. Public Dissemination

The Coordinator will ensure that Title VI Program information is disseminated to city employees, contractors, and beneficiaries as well as the general public. Public dissemination will include the posting of public statements, inclusion of Title VI language in contracts, and publishing the Title VI Policy Statement on the city's website, social media pages, and can be mailed out upon request.

I. Post grant Reviews

The Title VI Coordinator will meet with department heads and administrators to review the grant awards and ensure compliance with Title VI requirements following notices of grant awards.

J. Elimination of Discrimination

The City will implement procedures to identify and eliminate discrimination when found to exist, related to Minority/Women Disadvantage Business Enterprises (DBE) contractors, and public involvement. Moreover, the Title VI Coordinator will work closely with staff to ensure that information flows to communities affected by federal projects etc.

K. Remedial Action

The City will actively pursue the prevention of Title VI deficiencies and violations and will take the necessary steps to ensure compliance with all program administrative requirements. Should irregularities occur in the administration of the program's operation, corrective action will be taken to resolve Title VI issues, and such actions will be reduced to

writing in the form of a remedial action agreed upon to be necessary, all within a period not to exceed 90 days.

- 1) Subrecipients placed in a deficiency status will be given a reasonable time, (not to exceed 90 days after receipt of the deficiency letter), to voluntarily correct deficiencies.
- 2) The City will seek the cooperation of the subrecipient in correcting deficiencies found during the review. The City will also provide the technical assistance and guidance needed to aid the subrecipient to comply voluntarily.
- 3) A follow-up review will be conducted within 180 days of the initial review to ensure that the subrecipient has complied with the Title VI Program requirements in correcting deficiencies previously identified.
- 4) When a subrecipient fails or refuses to voluntarily comply with requirements within the timeframe allotted, the City will submit to the appropriate local, state, and/or federal office copies of the case file and a recommendation.

Title VI Coordinator Responsibilities

The Coordinator is charged with the responsibility for implementing, monitoring and ensuring the City's compliance with Title VI Regulations. Title VI responsibilities are as follows:

1. Prepare an annual report of City Title VI accomplishments and upcoming goals including an annual update to the Title VI Program Plan that reflects organizational, policy and implementation changes.
2. Conduct Title VI compliance reviews of department program area activities of federal financial assistance.
3. Collect statistical data (race, color, national origin, sex disability, and age) on the City's relevant boards, commissions, and committees, and participants in and beneficiaries of the City's programs, activities, and services.
4. Review pre-grant and post-grant awards for compliance with Title VI requirements.
5. Coordinate the development and implementation of a training program and conduct training programs on Title VI and other related statutes for City employees and recipients of federal grant funds.
6. Process Title VI complaints.
7. Ensure that Title VI requirements are included in policy directives and that the procedures used have built-in safeguards to prevent discrimination.
8. Assist program personnel to correct Title VI problems or discriminatory practices or policies found when conducting self-monitoring and compliance review activities.

9. Manage the City 's Limited English Proficiency (LEP) Program ensuring that City information and services are accessible to customers. Develop Title VI information for public dissemination, where appropriate, in languages other than English.
10. Where appropriate, refer Title VI discrimination complaints to the Civil Rights Office, the Office of Equal Opportunity, and/or the Discrimination Complain Investigation Unit(DCIU).

Title VI Responsibilities for the City 's Program Areas

Education and Training

The Coordinator will seek all opportunities to participate in education and training. All Title VI conferences, seminars, trainings and classes presented by all available sources will be considered for staff attendance.

The Coordinator will be responsible to inform all staff members and consultants of all federal Title VI policies including any changes and updates.

Education and Training may also consist of the City hosting training seminars related to all Title VI issues and inviting all interested and pertaining parties to attend.

The Coordinator will be briefed when training courses or workshops becomes available for City employees.

Public Participation

The goal of the City 's communications and public participation program is to ensure early and continuous public notification about, and participation in, major actions and decisions by City of West Columbia. In seeking public comment and review, the City makes a concerted effort to reach all segments of the population, including people from minority and low-income communities, and organizations representing these and other protected classes. The City advertises its public meetings calendar on its website at www.westcolumbiasc.gov.

Environmental Justice

The concept of environmental justice includes the identification and assessment of disproportionately high and adverse effects of programs, policies, or activities on the minority and low-income population groups. When City of West Columbia adopts new planning documents, or substantively amends existing documents, the City may be required to comply with federal environmental justice requirements. When this occurs, a systematic process is used to study and evaluate all necessary environmental aspects of the proposed action(s). Depending on the scope, complexity, and impacts of the project, the City 's Title VI Coordinator oversees the process, and ensures all federal and state requirements are met, and that the public has been invited to participate.

Contract Procedures

Appropriate Title VI text will be included in City Request for Proposals (RFP) and contracts.

Disadvantaged Business Enterprise (DBE) Program

Where appropriate, the City will include DBE text in its RFPs and contracts. City of West Columbia can utilize SCDOT's certified DBEs when awarding C-Fund projects.

Consultant Reviews

Consultants hired utilizing federal funds will be made aware that they are required to adhere to our City's Title VI Plan, DBE Policy and Procedures, and LEP Plan. To ensure their compliance, the City will issue them the Title VI and LEP plan. An Annual Title VI Review will be given yearly to all firms who have been awarded federally funded City contracts within that fiscal year.

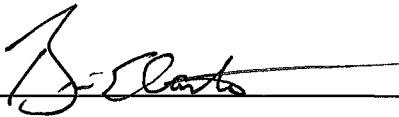
If consultants refuse to comply the City will determine further action to be taken.

Questions

For any questions regarding the City of West Columbia Title VI Plan or any related policies and procedures please contact City of West Columbia's Title VI Coordinator at 803-939-8628 or visit our website at www.westcolumbiasc.gov.

4. That where the Recipient receives federal financial assistance to construct a facility, or part of a facility, the Assurance shall extend to the entire facility and facilities operated in connection therewith.
5. The Recipient shall provide for such methods of administration for the program as are found by the Secretary of Transportation, or the official to whom s/he delegates specific authority to give reasonable guarantee that it, other recipients, subgrantees, contractors, subcontractors, transferees, successors in interest, and other participants of federal financial assistance under such program will comply with all requirements imposed or pursuant to the Act, the Regulations, and this Assurance.
6. The Recipient agrees that the United States has a right to seek judicial endorsement with regard to any matter arising under the Act, the Regulations, and this Assurance.

THIS ASSURANCE is given in consideration of and for the purpose of obtaining any and all federal grants, loans, contracts, property, discounts or other federal financial assistance extended after the date hereof to the Recipient by the Department of Transportation under the Federal Aid Highway Program and is binding on it, other recipients, subgrantees, contractors, subcontractors, transferees, successors in interest and other participants in the Federal Aid Highway Program. The person or persons whose signatures appear below are authorized to sign the Assurance on behalf of the Recipient.



Brian E. Carter
Administrator
City of West Columbia, South Carolina

8/21/19

Date

Title VI Public Notice

The paragraph below is to be inserted in all relevant publications that are distributed to the public for the City of West Columbia. The text will remain permanently on the City's website, www.westcolumbiasc.gov, and available to all employees. The version below is the preferred text, but where space is limited or in publications where cost is an issue an abbreviated version can be used in its place.

Title VI Notice: City of West Columbia fully complies with Title VI of the Civil Rights Act of 1964 and related statutes, executive orders, and regulations in all programs and activities. The City operates without regard to race, color, national origin, income, gender, age, and disability. Any person who believes him/herself or any specific class of persons, to be subjected to discrimination prohibited by Title VI may by him/herself or by representative file a written complaint with the City of West Columbia, Title VI Coordinator. A complaint must be filed no later than 180 days after the date of the alleged discrimination.

The following shortened version of the above paragraph can be used in publications where space or cost is an issue as in classified newspaper announcements.

Title VI Notice: City of West Columbia 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 obtain a Title VI Complaint Form call our Title VI Coordinator at 803-939-8628

Public Meeting Notices

The paragraph below is to be inserted in all notices and agendas for public meetings related to federal grant projects. The version below is the preferred text, but where space is limited or in publications where cost is an issue an abbreviated version can be used in its place.

City meetings are conducted in accessible locations and materials can be provided in accessible formats and in languages other than English. If you would like accessibility or language accommodation, please contact the Title VI Coordinator at City of West Columbia at 803-939-8628 or the language line at 1-800-523-1786, Client ID: 916075. If you wish to attend a City function and require special accommodations, please give City of West Columbia one week's notice in advance.

If special accommodations are needed to participate in this public meeting, contact the City of West Columbia Clerk at (803) 791-1800 at least five business days prior to the scheduled meeting date.



City of West Columbia
Bridging Past, Present and Future

Appendix C

LIMITED ENGLISH PROFICIENCY PLAN

August 2019



Limited English Proficiency Policy

The City follows Executive Order 13166 in identifying and engaging Limited English Proficiency (LEP) populations to ensure their involvement and knowledge of transportation planning and projects in and around their communities. A LEP person is defined as one who does not speak English as his or her primary language and has a limited ability to read, write, or understand English.

City of West Columbia's policy for engaging individuals with Limited English Proficiency is to provide translation services to individuals who request them, if reasonable accommodations can be made. In addition, the City proactively identifies communities with high concentrations of LEP persons and employs tactics and strategies to effectively engage them in the planning process.

Executive Order 13166

Executive Order 13166 "Improving Access to Services for Persons With Limited English Proficiency," reprinted at 65 FR 50121 (August 16, 2000), directs each Federal agency that is subject to the requirements of Title VI to publish guidance for its respective recipients clarifying that obligation. Executive Order 13166 further directs that all such guidance documents be consistent with the compliance standards and framework detailed in the Department of Justice's (DOJ's) Policy Guidance entitled "Enforcement of Title VI of the Civil Rights Act of 1964--National Origin Discrimination Against Persons With Limited English Proficiency." (See 65 FR 50123, August 16, 2000 DOJ's General LEP Guidance). Different treatment based upon a person's inability to speak, read, write, or understand English may be a type of national origin discrimination.

Executive Order 13166 applies to all federal agencies and all programs and operations of entities that receive funding from the federal government, including state agencies, local agencies and governments such as the MPO, private and non-profit entities, and subrecipients.

Plan Summary

This Limited English Proficiency Plan has been developed to help identify reasonable steps to provide language assistance for persons seeking services provided by the City of West Columbia as required by Executive Order 13166. In this plan, we discuss ways to identify persons who need language assistance, language assistance measures, staff training, and updates to the plan.

When it comes to identifying and assessing the frequency and resources required to meet the needs of our residents with Limited English Proficiency, the City of West Columbia employs the use of the four-factor analysis which includes:

Four-Factor Analysis

1. The number and proportion of LEP persons residing within the City.

The City of West Columbia's population estimates from the 2018 American Community Survey 5-Year Estimates (2013-2017) provided by the U.S. Census Bureau estimate total population at 17,821. Total Households with Limited English-speaking abilities: 374 out of 7,851 households (4.8%)
Total population (ages 5+) speaking English less than "Very Well":
1,233

(7.6%) Of those speaking English less than well, the breakdown of languages are as follows:

Language	Population estimate	Speak English less than "very well" estimate
Spanish or Spanish Creole	10.1%	72.2%
Other Indo-European	0.9%	13.4%
Asian and Pacific Island	0.7%	28.1%
Other Languages	0.2%	38.5%

Language assistance is available upon request.

2. The frequency with which LEP persons come into contact with City services and programs.

The City of West Columbia has received two requests in the past two years for translation or interpretation of its services into Spanish.

3. The nature and importance of the program, activity, or service provided by the City of West Columbia.

The City believes all citizens should be able to access its nondiscrimination and public involvement policy. Title VI information is available on our website and by request. The City of West Columbia also utilizes a language line for persons who speak another language. City staff are equipped with iPads and Surface Pros which have Google Translate capabilities. The Surface Pro also has the ability to read aloud Word Documents for individuals who may need that type of assistance.

4. The resources available and cost of LEP services.

To date, the utilization of bi-lingual employees and above-mentioned technology have successfully provided assistance where staff has identified a need.

How City of West Columbia Identifies LEP Persons Who May Need Assistance

- Examine requests for language assistance from past meetings and events to anticipate the potential need for assistance at upcoming meetings.
- A staff member will be placed at the entrance to relevant public meetings to greet and briefly engage with attendees during sign-in to informally gauge each attendee's ability to write, speak and understand English.
- Staff will be trained to identify non-verbal clues that a person may have Limited English Deficiency, such as reluctance to fill out surveys or sign-in at public meetings.

- Examine Census Bureau population numbers of those who report a primary language other than English and compare that to Census block data and map communities accordingly to determine high concentrations of LEP populations.
- Maintain a stream of communication with LEP community leaders, as well as seek to establish new relationships.

Implementing Language Assistance Measures

- Based on Census Bureau data, City of West Columbia will evaluate documents, and translate those deemed most widely accessed, into any language other than English that is spoken by more than 5% of the population.
- The City will continue to search out venues that have been found to be frequented by LEP individuals and make information available at these locations in the most appropriate format and language.
- City of West Columbia takes a proactive approach in identifying LEP communities and will continue to host meetings in close proximity to these communities to distribute all necessary translated materials and documents.
- City of West Columbia remains committed to providing oral and written translation services upon request. City of West Columbia will maintain an active list of interpreters and translators to accommodate LEP individuals.
- All projects falling within a City LEP area are reviewed on a case by case basis. If the nature and importance of the program, activity, and service is deemed significant then the City and all entities conducting business on our behalf will follow these same LEP guidelines.

Staff Training

City of West Columbia relevant staff will be provided with the LEP plan and will be educated on procedures and services available. Training topics are listed below:

- Understanding the Title VI LEP responsibilities
- What language assistance services City of West Columbia offers
- How to identify LEP individuals in public meetings
- How to access an interpreter
- Documentation of language assistance requests
- How to handle a complaint

Monitoring and Updating the LEP Plan

This plan is dynamic and may be updated as more effective means of communication are developed. At a minimum, City of West Columbia follows the Title VI Program update schedule for the LEP plan. The City will update its LEP Plan as new Census data becomes available.

Dissemination of the City 's Limited English Proficiency Plan

The City will post the LEP Plan on its website at www.westcolumbiasc.gov.

Any person, including social service, non-profit, law enforcement agencies and other community members with internet access will be able to access the plan. For those without personal internet service, City Hall, Riverwalk Amphitheater, Butler Park, Reeves Park, and the Cayce-West Columbia Library offer free internet access. A hard copy of the LEP Plan will be provided to any person or agency upon request. Persons with Limited English Proficiency may also obtain translations of this plan upon request.

Any questions or comments regarding this plan should be directed to the City of West Columbia Title VI Coordinator.

Requesting Translation Services

Any individuals who wish to request oral or written translation services for city related documents can do so through the City 's website at www.westcolumbiasc.gov or by contacting City of West Columbia's Title VI Coordinator:

City of West Columbia
Attn: Title VI Coordinator
200 N. 12th Street
West Columbia, SC 29072
803-939-8628
grants@westcolumbiasc.gov

Americans with Disability Act (ADA) Notices

ADA Policy

Title II of the Americans with Disabilities Act of 1990 prohibits discrimination and ensures equal opportunity for persons with disabilities in employment, State and local government services, public accommodations, commercial facilities, and transportation. In accordance with these requirements the City will not discriminate against qualified individuals with disabilities on the basis of disability in services, programs or activities.

City of West Columbia's Commitment

- City of West Columbia will make all reasonable modifications to policies and procedures to ensure that people with disabilities have an equal opportunity to attend all City public meetings.
- City of West Columbia will generally, upon request, provide appropriate aids and services leading to effective communication for qualified persons with disabilities so they can participate equally in City public meetings.
- City of West Columbia will post the following notice at the bottom of City meeting notices:

If special accommodations are needed to participate in this public meeting, please contact the City Clerk at (803) 791-1880 at least five business days prior to the scheduled meeting date.

- City Hall is located at 200 N. 12th Street, West Columbia, South Carolina, 29169. The building is ADA accessible.
- City of West Columbia will include language in our contracts to ensure nondiscrimination of all persons with disability.

The ADA does not require the City to take any action that would fundamentally alter the nature of its programs or services or impose an undue financial or administrative burden. City of West Columbia will strive to provide its services, programs and activities in the most accessible manner feasible.

Notification that a City meeting is not accessible to persons with disabilities should be directed to:

City of West Columbia
Attention: City Building Official
200 N. 12th Street, West Columbia, SC 29169
Phone: 803-791-1880

Environmental Justice

Environmental Justice Policy

It is the policy of the City to ensure that all of its programs, policies, and other activities do not have disproportionate adverse effects on minority and low-income populations. The City identifies minority communities through the use of Census data. City of West Columbia maps Census data to more accurately locate concentrations of target populations.

Executive Order 12898

The City of West Columbia follows Executive Order (EO) 12898 which outlines;

Each Federal agency must make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health, environmental, economic and social effects of its programs, policies, and activities on minority and low income populations, particularly when such analysis is required by NEPA. The EO emphasizes the importance of NEPA's public participation process, directing that each Federal agency shall provide opportunities for community input in the NEPA process. Agencies are further directed to identify potential effects and mitigation measures in consultation with affected communities.

The EO requires agencies to work to ensure effective public participation and access to information. Thus within its NEPA process and through other appropriate mechanisms, each federal agency should translate crucial public documents, notices and hearings, relating to human health or the environment for limited English speaking populations when it is practical and appropriate.¹

Goals and Objectives

City of West Columbia is committed to the following goals and objectives for achieving environmental justice:

- Protect environmental quality and human health in all conditions
- Avoid disproportionate adverse impacts on minority and low-income populations
- Enhance the public involvement process and strengthen relationships with community organizations
- Provide minority and low-income populations with the opportunity to learn more about the transportation planning process
- Make sure all projects go through an Environmental and Title VI checklist to ensure environmental issues are considered and appropriate actions are followed

¹ Taken directly from <http://www.fema.gov/plan/ehp/ehplaws/ejeo.shtml>

- Promote and protect community members' rights to participate meaningfully in decisions that may affect them
- Make the process of filing environmental justice complaints easy through readily available forms on the City website and in the Community Development office, and by designating an identified City of West Columbia staff member as the Title VI Coordinator that citizens can easily speak with.

Filing and Environmental Justice Complaint

Any individual or community that wishes to file an environmental justice complaint or discuss concerns may contact:

City of West Columbia Attention:

Title VI Coordinator

200 N 12th Street

West Columbia, SC 29169

Phone: 803-939-8628

Title VI Complaint Procedures

Introduction

These procedures apply to complaints filed under Title VI of the Civil Rights Act of 1964, relating to any program and/or activity administered by City of West Columbia or its subrecipients, consultants, and/or contractors. Intimidation or retaliation of any kind is prohibited by law.

These procedures do not deny the right of the complainant to file formal complaints with other State or Federal agencies, or to seek private counsel for complaints alleging discrimination. These procedures are part of an administrative process that does not provide for remedies that include punitive damages or compensatory remuneration for the complainant.

Every effort will be made to obtain early resolution of complaints at the lowest possible level. The option of informal mediation meeting(s) between the affected parties and the investigator may be utilized for resolution, at any stage of the process. City of West Columbia will make every effort to pursue a resolution of the complaint. Initial interviews with the complainant and the respondent will include requests for information regarding specific relief and settlement options.

Filing

Any person who believes that he, she, or any specific class of persons has been subjected to discrimination or retaliation prohibited by Civil Rights authorities, based upon race, color, sex, age, national origin, or disability may file a written complain to City of West Columbia's Title VI Coordinator. 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:

- Complaints must be in writing and signed by the complainant(s).
- Complaints must include the name, address, and telephone number of each complainant.
- Complaints must include the date of the alleged act(s) of discrimination (date when the complainant(s) became aware of the alleged discrimination; or the date on which the conduct was discontinued or the latest instance of the conduct).
- Complaints must present a detailed description of the issues, including names, job titles, and addresses of those individuals perceived as parties in the action complained against.

Receipt and Acceptance

Upon receipt of the complaint, the Title VI Coordinator will determine its jurisdiction and any need for additional information. The complaint will be forwarded to the City Administrator for a determination of acceptability. The Title VI Coordinator will notify the complainant, in writing, within ten (10) business days of receipt of the complaint.

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 occurrences or when the alleged discrimination became known to the complainant.
- b. The allegation(s) must involve a covered basis such as race, color, gender, age, income, disability, or national origin.
- c. The allegation(s) must involve a program or activity that receives Federal financial assistance.

Dismissal

A complaint may be recommended for dismissal for the following reasons:

- a. The complainant requests withdrawal of the complaint.
- b. The complainant fails to respond to three requests for additional information needed to process the complaint.
- c. The complainant cannot be located after reasonable attempts.

Investigation of Complaints

In cases where City of West Columbia assumes responsibility for investigation, the City will provide the respondent with the opportunity to respond to the allegations in writing. The City Administrator will be responsible for investigating and evaluating the complaint, developing an investigative plan, conducting interviews, collecting and analyzing evidence, and preparing an investigative report. The City Administrator will issue a final agency decision (FAD) and provide written notification of the decision to the complainant and respondent.

Appeals

If the City Administrator concludes that the respondent is in compliance with laws/regulations and the complainant disagrees, the complainant may, if dissatisfied, file an action in the appropriate U.S. District Court.

Please submit your complaint to:

City of West Columbia

Attention: Title VI

Coordinator/Director of Grants

and Special Projects

200 N 12th Street

West Columbia, SC 29169

Phone: 803-939-8628

City of West Columbia Discrimination Complaint Form

Last Name	First Name	<input type="checkbox"/> Male <input type="checkbox"/> Female
Mailing Address	City/State	Zip
Home Telephone	Other Telephone	Email Address
Type of Discrimination <input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin <input type="checkbox"/> Age <input type="checkbox"/> Religion <input type="checkbox"/> Disability <input type="checkbox"/> Sex/Gender		
Race of Complainant <input type="checkbox"/> Black <input type="checkbox"/> White <input type="checkbox"/> Hispanic <input type="checkbox"/> Asian American <input type="checkbox"/> American Indian <input type="checkbox"/> Alaska Native <input type="checkbox"/> Pacific Islander <input type="checkbox"/> Other _____		
<p>How were you discriminated against? Please explain your complaint as clearly as possible. Include how other persons were treated differently. Use additional sheet(s), if necessary. Attach supporting documents if available.</p>		
<p>Date and place of the alleged discriminatory action(s). Please include the earliest date of discrimination and the most recent date(s) of discrimination.</p>		
<p>The law prohibits intimidation or retaliation against anyone because they have either taken action, or participated in action, to secure rights protected by the laws. If you feel that you have been retaliated against, separate from the discrimination alleged above, please explain the circumstances below. Describe the action you took which you believe was the cause for the alleged retaliation.</p>		

Name(s) of individual(s) responsible for the discriminatory action(s).													
Name(s) of person(s) who may be contacted for additional information to support or clarify your complaint. (Attach additional sheets, if necessary). <table style="width: 100%; border-collapse: collapse;"> <tr> <th style="text-align: left; width: 33%;"><u>Name</u></th> <th style="text-align: left; width: 33%;"><u>Address</u></th> <th style="text-align: left; width: 33%;"><u>Telephone</u></th> </tr> <tr> <td>1. _____</td> <td>_____</td> <td>_____</td> </tr> <tr> <td>2. _____</td> <td>_____</td> <td>_____</td> </tr> <tr> <td>3. _____</td> <td>_____</td> <td>_____</td> </tr> </table>		<u>Name</u>	<u>Address</u>	<u>Telephone</u>	1. _____	_____	_____	2. _____	_____	_____	3. _____	_____	_____
<u>Name</u>	<u>Address</u>	<u>Telephone</u>											
1. _____	_____	_____											
2. _____	_____	_____											
3. _____	_____	_____											
What action(s) have you or your representative done to attempt to resolve this complaint? Please include filing dates or other dates as applicable. <table style="width: 100%; border-collapse: collapse;"> <tr> <th style="text-align: left; width: 60%;">Action</th> <th style="text-align: left; width: 40%;">Date</th> </tr> <tr> <td><input type="checkbox"/> _____</td> <td>_____</td> </tr> <tr> <td><input type="checkbox"/> _____</td> <td>_____</td> </tr> <tr> <td><input type="checkbox"/> _____</td> <td>_____</td> </tr> <tr> <td><input type="checkbox"/> _____</td> <td>_____</td> </tr> </table>		Action	Date	<input type="checkbox"/> _____	_____	<input type="checkbox"/> _____	_____	<input type="checkbox"/> _____	_____	<input type="checkbox"/> _____	_____		
Action	Date												
<input type="checkbox"/> _____	_____												
<input type="checkbox"/> _____	_____												
<input type="checkbox"/> _____	_____												
<input type="checkbox"/> _____	_____												
Please provide any additional information you feel would be helpful in investigating this matter.													
Briefly explain what action you are seeking. <div style="display: flex; justify-content: space-between; margin-top: 20px;"> <div style="width: 45%; text-align: center;"> _____ Complainant's Signature </div> <div style="width: 45%; text-align: center;"> _____ Date </div> </div>													
Mail Complaint Form To: City of West Columbia 200 N 12 th Street, West Columbia, SC 29169 Attention: Title VI Coordinator													
<div style="text-align: center; margin-bottom: 5px;">For Official Use Only</div> Date Complaint Received _____ Referred to: _____ Date Referred: _____													