

# City of Ogdensburg

## TITLE VI PLAN

**Prepared by:**

**City Clerk's Office  
City of Ogdensburg  
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Ogdensburg, NY 13669  
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## Title VI Plan

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## **Title VI/Nondiscrimination Policy Statement**

The City of Ogdensburg assures that no person shall on the grounds of race, color, national origin, or sex 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 Ogdensburg further assures every effort will be made to ensure nondiscrimination in all of its programs and activities, whether those programs and activities are federally funded or not.

In the event that the City of Ogdensburg distributes federal aid funds to another governmental entity, the City of Ogdensburg will include Title VI language in all written agreements and will monitor for compliance. The City of Ogdensburg's Contract Compliance Office is responsible for initiating and monitoring Title VI activities, preparing required reports and other City of Ogdensburg responsibilities as required by 23 CFR 200 and 49 CFR 21.

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### **Authorities**

Title VI of the 1964 Civil Rights Act provides that no person in the United States shall, on the grounds of race, color, national origin, or sex 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 (please refer to 23 CFR 200.9 and 49 CFR 21).

The Civil Rights Restoration Act of 1987 broadened the scope of Title VI coverage by expanding the definition of terms "programs or activities" to include all programs or activities of Federal Aid recipients, subrecipients, and contractors, whether such programs and activities are federally assisted or not (Public Law 100-259 [S. 557] March 22, 1988).

### **Additional Authorities and Citations Include:**

Title VI of the Civil Rights Act of 1964; 42 USC 2000d to 2000d-4; 42 USC 4601 to 4655; 23 USC 109(h); 23 USC 324; DOT Order 1050.2; EO 12250; EO 12898; 28 CFR 50.3; EO 13166.

**Name of Subrecipient**  
**Title VI Reporting Relationships**

The City of Ogdensburg has appointed Jennifer Ashley as the City of Ogdensburg Title VI Coordinator.

The City of Ogdensburg is required to appoint a Coordinator under 23 CFR 200.9(b)(1) with easy access to the head of the agency. Jennifer Ashley, a direct appointee of the **City Manager**, has such access pursuant to the City of Ogdensburg's Charter:

The contact information for the City's Title VI Coordinator is as follows:, the City of Ogdensburg Title VI Coordinator, 330 Ford Street, Room #11, Ogdensburg, NY 13669, (315) 393-7900.

Jennifer Ashley,  
City of Ogdensburg Title VI Coordinator  
330 Ford Street, Room #11, Ogdensburg, NY 13669  
(315) 393-7900  
jashley@ogdensburg.org

Appointment of Title VI Program Specialists

In addition to appointing a Title VI Coordinator, the City of Ogdensburg has proactively appointed several Title VI Program Specialists to annually monitor the City of Ogdensburg emphasis program areas. The emphasis program areas are: Planning, Environment, Design, Right-of-Way, Construction, Maintenance, Safety, and Research. The mailing address for all such contacts is 330 Ford Street, Ogdensburg, NY 13669. The personal contact information for each is as follows:

Contract Compliance:

Jennifer Ashley, 330 Ford Street, Room #11, Ogdensburg, NY 13669, (315) 393-7900.

Engineering Services

Jennifer Ashley, 330 Ford Street, Room #11, Ogdensburg, NY 13669, (315) 393-7900.

Design

Scott Thornhill, 901 Champlain Street, Ogdensburg, NY 13669, (315) 393-2300.

Construction

Gregg Mallette, 330 Ford Street, Ogdensburg, NY 13669, (315) 393-1935.

Maintenance

Scott Thornhill, 901 Champlain Street, Ogdensburg, NY 13669, (315) 393-2300.

Right-of-Way

Scott Thornhill, 901 Champlain Street, Ogdensburg, NY 13669, (315) 393-2300.

Environmental Services

Scott Thornhill, 901 Champlain Street, Ogdensburg, NY 13669, (315) 393-2300.

Safety

Scott Thornhill, 901 Champlain Street, Ogdensburg, NY 13669, (315) 393-2300.

Research

Kathleen Bouchard, 330 Ford Street, Room #4, Ogdensburg, NY 13669, (315) 393-3540.

Planning and Research

Andrea Smith, 330 Ford Street, Room #11, Ogdensburg, NY 13669, (315) 393-7150.

### **Program Administration and Title VI Coordinator's Responsibilities**

As authorized by the City Manager, the Title VI Coordinator and Title VI Program Specialists are responsible for initiating, monitoring, and ensuring the City of Ogdensburg's compliance with Title VI requirements as follows:

1. Process, review and investigate Title VI complaints received by the City of Ogdensburg in accordance with the City of Ogdensburg's Complaint Procedures. If any individual believes they or any other program beneficiaries have been subject to unequal treatment or discrimination as to the receipts of benefits and/or services, or on the grounds of race, color, national origin, or gender, they may file a complaint with the City of Ogdensburg. It is the goal of the City of Ogdensburg to resolve complaints informally at the lowest managerial level.
2. Collect statistical data (race, color, income, gender, and national origin) of participants in and beneficiaries of, City of Ogdensburg highway programs (i.e., relocatee's, impacted citizens, and affected communities). Each of the Title VI special emphasis program area will maintain data to be incorporated in the Title VI updates. Procedures will be reviewed regularly to ensure the data is sufficient in meeting the Title VI program administration requirements.
3. Review special emphasis program areas to determine the effectiveness of program area activities at all levels. In addition to the day-to-day monitoring, all special emphasis program areas will be reviewed annually to assure effectiveness in their compliance of Title VI provisions. The Title VI Coordinator and Title VI Program Specialists will coordinate efforts to ensure equal participation in their program areas and activities at all levels.
4. Conduct Title VI reviews when necessary of contractors and other recipients of federal aid highway funds.

5. Work with special emphasis program staff to ensure the fundamental principles of Environmental Justice outlined below:
  - Avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority populations and low-income populations.
  - Ensure the full and fair participation by all potentially affected communities in the transportation decision-making process.
  - Prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations.
6. Develop Title VI and Limited English Proficiency information for Public Dissemination. Ensure dissemination to the general public and, where appropriate, in languages other than English. The City will disseminate Title VI Program information to City employees, contractors, subcontractors, consultants, and subconsultants as well as the general public. Public dissemination will include posting of public statements and inclusion of Title VI language in contracts. The Title VI/Nondiscrimination Policy Statement will be published in newspapers having a general circulation in the vicinity of proposed projects and announcements of hearings and meetings in minority publications.
7. Conduct pre-grant and post-grant approval reviews of City of Ogdensburg programs and applicants for compliance with Title VI requirements; i.e., highway location, design and relocation, and persons seeking contracts with the City of Ogdensburg.
8. Prepare an Annual Title VI Update Report. The update will report on any accomplishments and changes to the program occurring during the preceding year. The update will include goals and objectives for the upcoming year.
9. Schedule training for Title VI related statutes for City of Ogdensburg employees. The training will provide comprehensive information on Title VI provisions, its application to program operations, identification of Title VI issues and resolution of complaints. All directives providing operational guidelines to all subrecipients, and special emphasis program areas will be reviewed annually to include Title VI language and provisions and related requirements, where applicable.
10. Identify and eliminate discrimination when found to exist. Work with all City of Ogdensburg Offices and Departments to establish procedures for promptly resolving deficiencies. Procedures will be implemented to identify and eliminate discrimination when found to exist, including, but not limited to utilization of disadvantaged business enterprises, public involvement and property acquisition.
11. Establish procedures for promptly resolving deficiency status and reducing to writing the remedial action agreed to be necessary within a period of 90 days. The City of Ogdensburg 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. When irregularities occur in the administration of the program's operation, procedures will be implemented to resolve Title VI issues, and reducing to writing remedial action agreed necessary within a period of 90 days.

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.

The City of Ogdensburg will seek the cooperation of the subrecipient in correcting deficiencies found during the Title VI compliance reviews. The City of Ogdensburg will also provide the technical assistance and guidance needed to aid the subrecipient to comply voluntarily.

When a subrecipient fails or refuses to voluntarily comply with requirements within the allotted time frame, the City of Ogdensburg will submit a copy of the case file to NYSDOT's Office of Civil Rights or the FHWA and a recommendation that the subrecipient be found in noncompliance.

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.

12. Maintain updated legislative and procedural information regarding the City of Ogdensburg's Title VI Program. This will include federal laws, rules and regulations, NYSDOT guidelines, the City of Ogdensburg Plan and updates, and other resource information pertaining to Title VI issues.

## **Complaint Procedures for Federally Assisted Programs and Activities**

These procedures cover all complaints filed under Title VI of the Civil Rights Act of 1964 as amended, (including its Disadvantaged Business Enterprises (DBE)), Section 504 of the Rehabilitation Act of 1973, Civil Rights Restoration Act of 1987, and the Americans with Disabilities Act of 1990, relating to any transportation or Public Works program or activity administered by the City as well as subrecipients, consultants, and contractors. In accordance with 24CFR8.53, 24CFR8.54 and 28CFR35.107(b), (see Appendix 4 for additional information on Section 504 ADA Grievance Procedures) these procedures apply to complaints filed against a program or activity funded by any Federal Agency including, but not limited to the Federal Highway Administration (FHWA), the Federal Transit Administration (FTA), or the Federal Aviation Administration (FAA).

Intimidation or retaliation of any kind is prohibited per Title 49, Code of Federal Regulations, Part 21.11(e).

The 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, which 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 managerial/administrative level possible. The option of informal mediation meeting(s) between the affected parties and the investigator may be used for resolution, at any stage of the process.

The investigator will make every effort to pursue a resolution of the complaint. Initial interviews with the complainant and the respondent will request information regarding specifically requested relief and settlement opportunities.

## **Procedures**

Any person who believes that they or any specific class of persons has been subjected to discrimination or retaliation prohibited by any of the Civil Rights authorities prohibited under Title VI based upon race, color, sex, age, national origin or disability may file a written complaint with the City of Ogdensburg.

### **Time Limits for Filing**

A formal complaint must be filed within 180 days after:

- The date of the alleged act of discrimination; or
- The date when the person became aware of the alleged discrimination; or
- There has been a continuing or the latest instance of the discriminatory conduct.

### **Form of Complaints**

A formal complaint must meet the following requirements:

Must be in writing and signed by the person or their representative and include the complainant's name, address and telephone number. A formal complaint of discrimination will also be acknowledged and processed if received by fax or e-mail.

A formal complaint of discrimination received by telephone will be written down and provided to the complainant for confirmation or revision before processing.

Must provide a detailed description of the issues including names, dates, and job titles of witnesses or those individuals perceived as parties in the complained of incident.

Upon receipt of the complaint, the City of Ogdensburg will determine its jurisdiction, acceptability, need for additional information and the investigative merit of the complaint. In cases where the complaint is against one of the City of Ogdensburg's subrecipients of federal highway funds, the City of Ogdensburg will assume jurisdiction and will investigate and adjudicate the case. Complaints against the City of Ogdensburg will be referred to the New York State Department of Transportation's Office of Civil Rights for proper disposition. In special situations warranting intervention to ensure equity, the NYSDOT Office of Civil Rights may assume jurisdiction and either complete or obtain services to review or investigate matters.

### **Acceptance of a complaint will be determined by**

Whether the complaint is timely filed;



Whether the allegations involve a covered basis such as race, color, national origin, gender, disability or retaliation;

Whether the allegations involve a program or activity of a Federal-aid recipient, subrecipient, or contractor; or, in the case of ADA allegations, an entity open to the public;

The complainant(s) acceptance of reasonable resolution based on the Department's administrative authority;

A complaint may be dismissed for the following reasons

- The complainant requests the withdrawal of the complaint;
- The complainant fails to respond to repeated requests for additional information needed to process complaint;
- The complainant cannot be located after reasonable attempts.

The City of Ogdensburg has sole authority for accepting complaints for investigation. Once the City of Ogdensburg decides to proceed with the investigation, the complainant and the respondent will be notified in writing of the determination within ten (10) calendar days. The complaint will receive a case number and be logged into the City of Ogdensburg's records identifying its basis, alleged harm, the race, color, national origin and gender of the complainant(s).

In cases where the City of Ogdensburg assumes investigation of the complaint, the City of Ogdensburg will provide the respondent with the opportunity to respond to the allegations in writing. The respondent will have ten (10) calendar days from the date of the City of Ogdensburg's written notification of acceptance of the complaint to furnish their response to the allegations.

Within 40 calendar days of the acceptance of the complaint, the City of Ogdensburg or NYSDOT investigator will prepare an investigative report for the City of Ogdensburg's Title VI Coordinator and the City Manager. The report will include a narrative description of the incident, identification of persons interviewed, findings and recommendations for disposition. The City of Ogdensburg's Title VI Coordinator and City Manager will have 10 calendar days to review and provide comments to the investigator.

Once the investigator addresses any comments to the preliminary investigative report, the report and its findings will be forwarded to the City of Ogdensburg Law Department for review. The Law Department attorneys will review the report and associated documentation and will provide input within 10 calendar days.

Any comments or recommendations from the City of Ogdensburg Law Department will be reviewed by the City Manager. There will be a period of 10 calendar days for the City Manager to discuss the report and any recommendations with the City of Ogdensburg's Title VI Coordinator, and to have the Title VI Coordinator address any modifications before the report's release to the corresponding United States Department of Transportation (USDOT) modality (FHWA, FTA, FAA).

The City of Ogdensburg's final investigative report and a copy of the complaint will be forwarded to either NYSDOT, FHWA, FTA, or FAA, within 60 calendar days of the acceptance of the complaint.

The City of Ogdensburg will notify the parties of its preliminary findings which are subject to the corresponding USDOT modality's concurrence.

The corresponding USDOT modality will issue the final decision to the City of Ogdensburg based on the investigative report.

USDOT will analyze the facts of the case and will issue its conclusion to the complainant according to their procedures. Once the corresponding USDOT modality issues its final decision, the City of Ogdensburg will notify all parties involved about such determination. USDOT's final determination is not subject to an appeal.

## **Special Emphasis Program Areas**

### **Planning**

#### **Planning and Program Development**

Develop near-term and long-term strategies to maintain and enhance the quality and safety of City of Ogdensburg transportation and infrastructure.

#### **Title VI Responsibilities**

Ensure that all aspects of the transportation planning process comply with Title VI.

Ensure participation of a cross section of various social, economic, and ethnic interest groups are represented in the planning process by disseminating program information to minority media and ethnic organizations and participating in roundtable meetings in minority and low-income communities when applicable.

Assist the Title VI Coordinator in gathering and organizing information for internal annual Title VI Update Reports.

Review the Program Development work program and other directives to ensure compliance with Title VI program requirements.

Ensure equal participation on Citizens Advisory Committees (CAC) by requesting the CAC provide information regarding their selection process for members and to furnish information on membership make up (race, gender, and position within the organization) for evaluation.

Visit CAC and public meetings to verify the level of participation of Title VI protected group members when offered in predominantly minority or low-income communities.

Gather statistical data on program participation regarding race, color and national origin.

### **Environmental Services**

#### **Consultant Contracts Administration**

Identify the needs for each project, ensure they are met in the contract, and ensure consultant compliance to the satisfaction of the City of Ogdensburg.

#### **Authorities:**

48 CFR 31; 23 CFR 172

National Environmental Policy Act of 1969, 42-USC-4321

23 CFR Part 771

40 CFR Part 1500

49 CFR Part 622

EO 12898

#### **Consultant Selection Process**

Utilizing the request for proposal and competitive bidding processes, the City of Ogdensburg selects the appropriate contractors and vendors for the project. Title VI nondiscrimination provisions will be incorporated into all written contracts and materials in this process.

**Environmental Process**

Work with neighborhood stakeholders and community groups to ensure that all affected residents have opportunities to participate in the planning, design and construction of transportation projects.

**Environmental Justice Outreach**

Public Involvement in the area of Environmental Justice will be achieved through outreach measures that assure meaningful involvement of minority and low-income populations. This will be achieved through a variety of measures, including but not limited to:

- Obtaining U.S. Census Data and data from the local School District to identify minority and low-income populations to determine impacts during the initial stages of project planning. Further analyze this data using additional sources, including area community, religious, and business associations, school districts, senior citizen groups, and economic development organizations.
- Inviting a cross section of the populace from social, economic, and ethnic groups in the planning process through written information in local newspapers and where possible, minority news media. Create notices that attract attention and are in layman's terms.
- Holding meetings at a variety of times during the day and providing various locations to facilitate access and participation by target populations.
- When necessary, translate documents, notices and hearings for limited English-speaking populations.
- Obtaining demographic data at applicable community meetings and public hearings. Data will be gathered through the use of voluntary self-reporting forms which include race, gender, and national origin. Copies of these forms will be sent to the Title VI Coordinator after each meeting.
- Document all evidence to support conclusions regarding Environmental Justice issues. Detail all efforts taken to identify minority or low-income populations affected by transportation planning activities.

**Limited English Proficiency Strategies**

Strategies to provide meaningful access to LEP persons to ensure that they can communicate effectively will be achieved by measures including but not limited to:

- Applying the "four factor analysis" process provided as a guideline from the U.S. Department of Justice to determine LEP needs. This process includes determining the number and proportion of LEP individuals within the population, the frequency with which LEP individuals will come in contact with the program, the nature and importance of the program to people's lives, and the resources available to provide translation services. The results of this analysis will be used to outreach and engage LEP persons in the transportation planning process.

- Developing a demographic assessment for the impacted area to determine if there is a 5% or more minority population requiring special language assistance, and address the needs.
- Developing a written policy to ensure the implementation of LEP measures that identify and assess the language needs of its LEP population. Provide for a range of language assistance options, including notices to LEP persons in a language they can understand regarding their right to free language assistance.
- Training to ensure that staff are knowledgeable and aware of LEP policies and procedures, and are trained to work effectively in the facilitation of the process.
- Providing translation services for public documents and competent interpreters at public hearings.
- Increasing opportunities for public involvement, particularly by historically underserved populations including LEP individuals by advertising in local and local minority newspapers.
- Monitoring the program to ensure that LEP persons have meaningful access to the transportation planning and implementation process.
- *See also* the City of Ogdensburg's *Language Access Plan*, available on the City of Ogdensburg's website.

**Title VI Responsibilities**

- Monitor compliance with Title VI requirements in all aspects of the environmental process, including Environmental Justice and Limited English Proficiency requirements. Conduct meetings to review the project impact.
- Disseminate to the public their right to call or write the department to view plans and discuss environmental problems.
- Ensure DBE goal attainment.
- Coordinate the gathering of environmental information for the Annual Title VI Update - -- Report including awards to DBE firms.
- Notify protected group residents of public meetings or hearings regarding a proposed project. Ensure time and location for public meetings or hearings is accessible.
- Maintain mechanisms to identify population affected by a project.
- Ensure participation of all segments of the impacted population in the location selection process.
- Ensure that all federally funded consultant contracts administered by this section have the appropriate Title VI Appendix enclosed.
- Review guidelines and procedures to ensure Title VI compliance.
- Maintain and update necessary data and documentation, including demographic data mapping ethnicity by area as required for completion of the department's internal annual Title VI Update Report.

# Engineering Services

## **Engineering Services**

Engineering services assess the City of Ogdensburg's infrastructure and prepares plans for construction, design, and repair. Special efforts will be made to inform members of minority communities of public hearings and other public involvement activities. These efforts include public notices in minority newspapers and selection of accessible location and time for public hearings or meetings.

## **Design Process**

Economic, social, topographic, and environmental impacts of a proposed project are key factors weighed in the location consideration. Special efforts in the area of Environmental Justice will be made to inform members of minority communities of public hearings and other public involvement activities. These efforts include public notices in minority newspapers and selection of accessible location and time for public hearings or meetings.

## **Construction Engineering**

Construction engineering deals with the designing, planning, construction, and management of infrastructures such as highways, bridges, airports, railroads, buildings, and utilities. Special efforts will be made to inform members of minority communities of public hearings and other public involvement activities. These efforts include public notices in minority newspapers and selection of accessible location and time for public hearings or meetings.

## **Authorities**

The following is an abbreviated list of statutes and regulations that Engineering Services must follow in the conduct of its work: Title VI of the Civil Rights Act of 1964, Civil Rights Restoration Act of 1987, Americans with Disabilities Act (ADA), National Environmental Protection Act (NEPA), National Historic Preservation Act, New York State Environmental Quality Review Act (SEQRA), Clean Air Act Amendment 1990, New York State Historic Preservation Act, New York State Smart Growth Public Infrastructure Policy Act, Executive Order 12898 Environmental Justice in Minority Populations, Executive Order 13045 Protection of Children from Environmental Health Risks and Safety Risks, New York State Fire Code, Manual of Uniform Traffic Control Devices (MUTCD), New York State Vehicle & Traffic Law, Municipal Code of the City of Ogdensburg, among others.

## **Construction Process**

Construction Engineering is responsible for new construction and maintaining City of Ogdensburg roads and bridges by using the resources of contractors, equipment, and materials in the most economic way. Construction Engineering provides guidance and oversight for the administration of transportation construction projects. Special efforts will be made to inform members of minority communities of public hearings and other public involvement activities. These efforts include public notices in minority newspapers and selection of accessible location and time for public hearings or meetings.

## **Title VI Responsibilities**

- Ensure that all aspects of the location selection process comply with the Title VI requirements.
- Consult and seek input from affected populations. Develop mechanisms to identify affected populations. Assure public participation in the selection process.
- Provide notice of public meetings in minority newspapers and newsletters when appropriate.
- Maintain required Title VI compliance documentation and statistical data. Gather statistical data on race, color & national origin for program requirements.
- Monitor program components for compliance with the Title VI requirements.
- Review activities associated with public hearings to enhance the participation of targeted communities.
- Develop and update operational manuals and guidelines to ensure the inclusion of Title VI language and provisions.
- Gather program area data to be included in the internal annual Title VI Update Report.

## **Right-of-Way**

### **Right-of-Way Programming**

Right-of-way programming involves monitoring and administering construction and obstructions in the right-of-way. Right-of-Way programming is handled by the Permitting Department of DES and involves inspections and compliance measures in the right-of-way.

### **Authorities:**

The following is an abbreviated list of statutes and regulations that Engineering Services must follow in the conduct of its work: Title VI of the Civil Rights Act of 1964, Civil Rights Restoration Act of 1987, Americans with Disabilities Act (ADA), National Environmental Protection Act (NEPA), National Historic Preservation Act, New York State Environmental Quality Review Act (SEQRA), Clean Air Act Amendment 1990, New York State Historic Preservation Act, New York State Smart Growth Public Infrastructure Policy Act, Executive Order 12898 Environmental Justice in Minority Populations, Executive Order 13045 Protection of Children from Environmental Health Risks and Safety Risks, New York State Fire Code, Manual of Uniform Traffic Control Devices (MUTCD), New York State Vehicle & Traffic Law, Municipal Code of the City of Rochester, 23 CFR 130, 49 CFR 24, among others.

### **Acquisition Process**

The guidelines in the Right-of-Way Manual are followed for property acquisition as well as all applicable laws and regulations, including Title VI and Section 504. The right of way acquisition process entails appraisal of property, negotiation of terms and conditions for acquisition, and assistance in the relocation of displaced individuals, businesses, farm operations, nonprofit organizations, and property management.

## **Title VI Responsibilities**

Ensure equal opportunity for disadvantaged businesses to participate in Personal Services Contracts. The contracts are typically appraisal contracts but can cover all services of real estate including negotiation, relocation, and property management. Ensure equal opportunity for disadvantaged business appraisers to participate by using current directories identifying fee appraiser organizations and the NYSDOT's list of certified fee appraisers. Apprise all affected property owners, tenants, and others involved of their rights and options regarding negotiation, relocation, condemnation and other aspects of the acquisition process.

- Conduct annual implementation reviews of Title VI provisions within the real estate acquisition process.
- Incorporate Title VI language and assurance statements in all surveys of property owners and tenants after the conclusion of all business. Coordinate the preparation of deeds, permits and leases to ensure the inclusion of the appropriate clauses, including Title VI Assurances.
- Ensure that appraised values and communications associated with the appraisal and negotiation operations result in equitable treatment.
- Ensure comparable replacement dwellings are available and assistance is given to all displaced persons and entities by the property acquisition process.
- Maintain statistical data including race, color, national origin, and sex on all relocatees affected by federally funded projects, and provide detailed demographic data quarterly to the Title VI Coordinator.
- Gather the statistical data required for completion of City of Ogdensburg's Annual Title VI Update Report including awards to minority and female appraisers.

## **Contract Compliance**

### **Contract Compliance**

Contract compliance ensures that the City of Ogdensburg is complying with standards regarding nondiscrimination and equal opportunity employment. It includes provisions that the City of Ogdensburg may not discriminate in any programs or services on the basis of race, color, sex, or national origin; must accept applications from women and minorities; must solicit bids for contract work from minority-and-women-owned businesses; and follow fair hiring, retention, and promotion policies.

### **Authorities:**

The following is an abbreviated list of statutes and regulations that Engineering Services must follow in the conduct of its work: Title VI of the Civil Rights Act of 1964, Civil Rights Restoration Act of 1987, Americans with Disabilities Act (ADA), National Environmental Protection Act (NEPA), National Historic Preservation Act, New York State Environmental Quality Review Act (SEQRA), Clean Air Act Amendment 1990, New York State Historic Preservation Act, New York State Smart Growth Public Infrastructure Policy Act, Executive Order 12898 Environmental Justice in Minority Populations, Executive Order 13045 Protection of Children from Environmental Health Risks and Safety Risks, New York State Fire Code, Manual of Uniform Traffic Control Devices (MUTCD), New York State Vehicle & Traffic Law, Municipal Code of the City of Ogdensburg, among others.



**Title VI Responsibilities**

- Review all projects for application of DBE goals. Gather statistical data on DBE utilization.
- Include DBE general special provisions in those projects with goals. Include Title VI language in contract award letters to encourage utilization of DBE firms. Award of construction contracts shall be granted on the basis of the lowest responsive bidder including DBE requirements.
- Ensure through reviews that prime contractors with DBE requirements award previously committed work to proper DBEs and that DBEs actually perform commercially useful functions on contracts.
- Review activities to ensure maintenance and construction efforts and resources are applied uniformly and fairly.
- Maintain program documentation necessary for internal annual Title VI updates.

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Chief Executive Officer

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Date

## **Appendix 1 - City of Ogdensburg Title VI Notice to Public**

The City of Ogdensburg hereby gives public notice that it is the City of Ogdensburg's policy to assure full compliance with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, and related statutes and regulations in all programs and activities. Title VI requires that no person in the United States of America shall, on the grounds of race, color, gender, or national origin be excluded from the participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which the City of Ogdensburg receives federal financial assistance.

Any person who believes they have been aggrieved by an unlawful discriminatory practice under Title VI has a right to file a formal complaint with the City of Ogdensburg. Any such complaint must be in writing and filed with the City Title VI Coordinator within one hundred eighty (180) days following the date of the alleged discriminatory occurrence. Title VI Discrimination Complaint Forms may be obtained from this office at no cost to the complainant on our website at [www.ogdensburg.org](http://www.ogdensburg.org) or by calling (315) 393-7900.

## Appendix 2 - *"The Name of Subrecipient"* Title VI Assurances

The City of Ogdensburg (hereinafter referred to as the "Recipient"), HEREBY AGREES THAT as a condition to receiving any federal financial assistance from the U.S. Department of Transportation it will comply with Title VI of the Civil Rights Act of 1964, 78 Stat. 252, 42 USC 2000d--42 USC 2000d--4 (hereinafter referred to as the Act), and all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, part 21, Nondiscrimination in Federally Assisted Programs of the Department of Transportation--Effectuation of Title VI of the Civil Rights Act of 1964 (hereinafter referred to as the Regulations), and other pertinent directives, to the end that in accordance with the Act, Regulations, and other pertinent directives, no person in the United States shall, on the grounds of race, color, sex, or national origin be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which the Recipient receives federal financial assistance from the New York State Department of Transportation, including the Federal Highway Administration, and HEREBY GIVES ASSURANCE THAT it will promptly take any measures necessary to effectuate this agreement. This Assurance is required by Subsection 21.7(a)(l) of the Regulations.

More specifically and without limiting the above general assurance, the Recipient hereby gives the following specific assurances:

1. That the Recipient agrees that each "program" and each "facility" as defined in Subsections 21.23(e) and 21.23(b) of the Regulations, will be (with regard to a "program") conducted, or will be (with regard to a "facility") operated in compliance with all requirements imposed by, or pursuant to, the Regulations.
2. That the Recipient shall insert the following notification in all solicitations for bids for work or material subject to the Regulations made in connection with the Federal Aid Highway Program, and in adapted form in all proposals for negotiated agreements:

The City of Ogdensburg, in accordance with Title VI of the Civil Rights Act of 1964 and 78 Stat. 252, 42 USC 2000d-d4 and Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, part 21, Nondiscrimination in federally assisted programs of the Department of Transportation issued pursuant to such Act, hereby notifies all bidders that it will affirmatively ensure that any contract entered into pursuant to this advertisement, minority business enterprises will be afforded full opportunity to submit bids in response to this invitation and will not be discriminated against on the grounds of race, color, sex, or national origin in consideration for an award.

3. That the Recipient shall insert the clauses of Appendix I of this Assurance in every contract subject to the Act and the Regulations.
4. That the Recipient shall insert the clauses of Appendix 2 of this Assurance, as a covenant running with the land, in any deed from the United States effecting a transfer of real property, structures, or improvements thereon, or interest therein.

5. 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.

6. That where the Recipient receives federal financial assistance in the form, or for the acquisition of real property, or an interest in real property, the Assurance shall extend rights to space on, over or under such property.

7. That the Recipient shall include the appropriate clauses set forth in Appendix 3 of this Assurance, as a covenant running with the land, in any future deeds, leases, permits, licenses, and similar agreements entered into by the Recipient with other parties: (a) for the subsequent transfer of real property acquired or improved under the Federal Aid Highway Program; and (b) for the construction or use of or access to space on, over or under real property acquired, or improved under the Federal Aid Highway Program.

8. That this Assurance obligates the Recipient for the period during which federal financial assistance is extended to the program, or is in the form of, personal property, or real property or interest therein or structures or improvements thereon, in which case the Assurance obligates the Recipient or any transferee for the longer of the following periods: (a) the period during which the property is used for a purpose for which the federal financial assistance is extended, or for another purpose involving the provision of similar services or benefits; or (b) the period during which the Recipient retains ownership or possession of the property.

9. 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 she/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.

10. 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 whose signature appears below is authorized to sign this Assurance on behalf of the Recipient.

## **Appendix 3 - For Contractors, Subcontractors, Suppliers, and Manufacturers**

During the performance of this contract, the contractor, for itself, its assignees and successors in interest (hereinafter referred to as the "contractor") agrees as follows:

### **1. Compliance with Regulations**

The contractor shall comply with the Regulations relative to nondiscrimination in federally assisted programs of the Department of Transportation (hereinafter DOT), Title 49, Code of Federal Regulations, part 21, as they may be amended from time to time, (hereinafter referred to as the Regulations), which are herein incorporated by reference and made a part of this contract.

### **2. Nondiscrimination**

The contractor, with regard to the work performed during the contract, shall not discriminate on the grounds of race, color, sex, or national origin in the selection and retention of subcontractors, including procurement of materials and leases of equipment. The contractor shall not participate either directly or indirectly in the discrimination prohibited by Section 21.5 of the Regulations, including employment practices when the contract covers a program set forth in Appendix B of the Regulations.

### **3. Solicitations for Subcontracts, Including Procurement of Materials and Equipment**

In all solicitations either by competitive bidding or negotiations made by the contractor for work to be performed under a subcontract, including procurement of materials or leases of equipment, each potential subcontractor or supplier shall be notified by the contractor of the contractor's obligations under this contract and the Regulations relative to nondiscrimination on the ground of race, color, sex, or national origin.

### **4. Information and Reports**

The contractor shall provide all information and reports required by the Regulations or directives issued pursuant thereto, and shall permit access to its books, records, accounts, other sources of information and its facilities as may be determined by The City of Ogdensburg or the NYSDOT to be pertinent to ascertain compliance with such Regulations, orders and instructions. Where any information required of a contractor is in the exclusive possession of another who fails or refuses to furnish this information, the contractor shall so certify to the City, or the New York State Department of Transportation as appropriate, and shall set forth what efforts it has made to obtain the information.

### **5. Sanctions for Noncompliance**

In the event of the contractor's noncompliance with the nondiscrimination provisions of this contract, The City of Ogdensburg and the NYS Department of Transportation shall impose such contract sanctions as it, or the Federal Highway Administration may determine to be appropriate, including, but not limited to:

1. Withholding of payments to the contractor under the contract until the contractor complies, and/or;
2. Cancellation, termination, or suspension of the contract, in whole or in part.

### **6. Incorporation of Provisions**

The contractor shall include the provisions of paragraphs (1) through (6) in every subcontract, including procurement of materials and leases of equipment, unless exempt by the Regulations, or directives issued pursuant thereto. The contractor shall take such action with respect to any subcontractor or procurement as the City of Ogdensburg or the Federal Highway Administration may direct as a means of enforcing such provisions including sanctions for noncompliance. Provided, however, that in the event a contractor becomes involved in, or is threatened with, litigation with a subcontractor or supplier as a result of such direction, the contractor may request the City of Ogdensburg enter into such litigation to protect the interests of the City of Ogdensburg and, in addition, the contractor may request the United States to enter into such litigation to protect the interests of the United States.

**Appendix 4**  
**NOTICE OF GRIEVANCE PROCEDURES**  
**UNDER THE AMERICANS WITH DISABILITIES ACT**

In accordance with the requirements of Title II of the Americans with Disabilities Act of 1990 (ADA), the City of Ogdensburg, New York will not discriminate against qualified individuals with disabilities on the basis of disability in its services, program, or activities.

**Employment:** The City of Ogdensburg does not discriminate on the basis of disability in its hiring or employment practices and complies with all regulations promulgated by the U.S. Equal Employment Opportunity Commission under Title I of the ADA.

**Effective Communication:** Ogdensburg, New York will generally, upon request, provide appropriate aids and services leading to effective communication for qualified persons with disabilities so they can participate equally in the City of Ogdensburg's programs, services, and activities, including qualified sign language interpreters, documents in Braille, and other ways of making information and communications accessible to people who have speech, hearing, or vision impairments.

**Modifications to Policies and Procedures:** Ogdensburg, New York will make all reasonable modifications to policies and programs to ensure that people with disabilities have an equal opportunity to enjoy all of its programs, services, and activities. For example, individuals with service animals are welcomed in all City Hall Offices, and Local Government Buildings, even where pets are generally prohibited.

Anyone who requires an auxiliary aid or service for effective communication, or a modification of policies or procedures to participate in a program, service, or activity of Ogdensburg, New York, should contact the City's Title VI Coordinator, in the Department of Engineering, as soon as possible but no later than 48 hours before the scheduled event.

The ADA does not require the City of Ogdensburg to take any action that would fundamentally alter the nature of its programs or services, or impose an undue financial or administrative burden.

Complaints that a program, service, or activity of the City of Ogdensburg is not accessible to persons with disabilities should be directed to the City's Title VI Coordinator, in the Department of Engineering.

The City of Ogdensburg will not place a surcharge on a particular individual with a disability or any group of individuals with disabilities to cover the cost of providing auxiliary aids/services or reasonable modifications of policy, such as retrieving items from locations that are open to the public but are not accessible to persons who use wheelchairs.

## Appendix A

The following clauses shall be included in any and all deeds affecting or recording the transfer of real property, structures or improvements thereon, or interest therein from the United States.

### GRANTING CLAUSE

NOW, THEREFORE, The City of Ogdensburg, as authorized by law, and upon the condition that the State of New York will accept title to the lands and maintains the project constructed thereon, in accordance with Title 23, United States Code, the Regulations for the Administration of Federal Aid for Highways and the policies and procedures prescribed by the Federal Highway Administration of the Department of Transportation and, also in accordance with and in compliance with all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, part 21, Nondiscrimination in federally assisted programs of the Department of Transportation (hereinafter referred to as the Regulations) pertaining to and effectuating the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252:42 USC 2000d to 2000d--4) does hereby remise, release, quitclaim, and convey unto City of Ogdensburg all the right, title, and interest of the Department of Transportation in and to said land described in Exhibit A attached hereto and made a part thereof.

### HABENDUM CLAUSE

*Pursuant to the provisions of Title VI Assurances:* The purchaser, for itself, himself or herself, its, his or her heirs, personal representatives, successors in interest and assigns does hereby covenant and agree that in the event facilities are constructed, maintained or otherwise operated on the property being purchased, for a purpose for which a United States Department of Transportation (USDOT) program or activity is extended or for another purpose involving the provision of similar services or benefits, the purchaser shall maintain and operate such facilities and services in compliance with all other requirements imposed pursuant to Title 49, Code of Federal Regulations, USDOT Subtitle A, office of the Secretary, part 21, Non-discrimination in federally assisted programs of the USDOT-Effectuation of Title VI of the Civil Rights Act of 1964, as said Regulations may be amended.

The purchaser, for itself, himself or herself, its, his or her heirs, personal representatives, successors in interest and assigns does hereby covenant and agree that (1) no person, on the grounds of race, color, sex or national origin shall be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination in the use of said facilities, (2) that in the construction of any improvements on, over or under such land and furnishings of services thereon, no person, on the grounds or race, color, sex or national origin shall be excluded from participation in, denied the benefits of, or otherwise be subjected to discrimination, (3) that the purchaser shall use the premises in compliance with all requirements imposed by, or pursuant to Title 49, Code of Federal Regulations, USDOT Subtitle A, office of the Secretary, part 21, Non-discrimination in federally assisted programs of the USDOT-Effectuation of Title VI of the Civil Rights Act of 1964, as said Regulations may be amended.

## **Appendix B**

The following clauses shall be included in all deeds, licenses, leases, permits, or similar instruments entered into by the City of Ogdensburg pursuant to the provisions of Assurances, number 7.

The LESSEE, or their heirs, personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree as a covenant running with the land that in the event facilities are constructed, maintained, or otherwise operated on the said property described in this lease, for a purpose for which a Department of Transportation program or activity is extended or for another purpose involving the provision of similar services or benefits, the LESSEE shall maintain and operate such facilities and services in compliance with all other requirements imposed pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, part 21, Nondiscrimination in federally assisted programs of the department of Transportation -- Effectuation of Title VI of the Civil Rights Act of 1964, as said Regulations may be amended. That in the event of breach of any of the above non-discrimination covenants, the City shall have the right to terminate the lease, and to reenter and repossess said land and the facilities thereon, and hold the same as if said lease had never been made or issued.

The following shall be included in all deeds, licenses, leases, permits, or similar agreements entered into by the City of Ogdensburg pursuant to the provisions of Assurances, number 7.

The LESSEE, or their personal representatives, successors in interest, and assigns, as a part of the consideration hereof, does hereby covenant and agree as a covenant running with the land that (1) no person, on the grounds of race, color, sex or national origin shall be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination in the use of said facilities, (2) that in the construction of any improvements on, over or under such land and furnishing of services thereon, no person on the grounds of race, color, sex, or national origin shall be excluded from participation in, denied the benefits of, or otherwise be subjected to discrimination, (3) that the LESSEE shall use the premises in compliance with all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, part 21, Nondiscrimination in federally assisted programs of the Department of Transportation ---Effectuation of Title VI of the Civil Rights Act of 1964, and as said Regulations may be amended.

That in the event of breach of any of the above nondiscrimination covenants, the City of Ogdensburg shall have the right to terminate the lease, and to re-enter and repossess said land and the facilities thereon, and hold the same as if said lease had never been made or issued.



## Appendix C

### Language Assistance Plan for the City of Ogdensburg

#### Purpose

The purpose of a language assistance plan is to meet Federal Transit Administration's requirements to comply with Title VI of the Civil Rights Act of 1964, which prohibits discrimination on the basis of race, color, or national origin. As a recipient of federal funds, our departments will take reasonable steps to ensure meaningful access to our services for persons who do not speak English at a level of "very well" according to census standards and who have a limited ability to write, read, speak or understand English. These persons are referred to as Limited English Proficient (LEP) by the FTA.

This plan conforms to the requirements as set out by FTA Circular 4702.18 Title VI Requirements and Guidelines for Federal Transit Administration Recipients dated October 1, 2012.

The language assistance plan for the City of Ogdensburg operations contain:

- A. Needs assessment based on the four-factor analysis
- B. Language assistance measures
- C. A staff training plan
- D. Methods for notifying LEP persons about language assistance
- E. Methods for monitoring, evaluating, and updating the plan

#### A. LEP Needs Assessment-the Four-Factor Analysis

**Factor 1. The number or proportion of LEP persons in our service area who may be served or are likely to encounter our programs.**

We assessed the following information about LEP persons to determine the number or proportion of LEP persons who might use or want to use our services:

US Census Bureau: Language Spoken at Home: 2009-2013 American Community Survey 5-Year Estimates and reports from employees about contact with LEP persons

According to the data obtained by the US Census Bureau:

1. The total number of LEP persons in our service area is 600. Our service area covers the boundaries of the City of Ogdensburg.
2. The total eligible population in our area is: 12,000
3. The proportion of LEP persons to the total eligible service population is 5%
  - a. Spanish-2%
  - b. Asian-2%
  - c. French-1%

**Factor 2. The frequency with which LEP persons come in contact with our programs:**

Our employees report minimal interaction or contact with LEP persons. Our employees report that annually they have 20 to 30 encounters with LEP patrons. We are developing internal procedures to better track this data to aide in assisting this population. We are putting in place a log for our employees to use should they come into contact with an LEP person. This log will include the employee's name, LEP person's name, date, their proficient language, as well as the contact location. It is our hope that this data will help us to better analyze the frequency of our interaction with LEP populations as well as possible outreach opportunities should LEP persons have common contact locations.

**Factor 3. The nature and importance of our programs provided to the LEP population.**

The City of Ogdensburg provides services to the general population, the elderly and disabled members of our community. All members of our community use our services regularly.

**Factor 4. The resources available to our programs and the overall cost to provide language assistance.**

Our current budget does not include any items for communicating with LEP persons in their language about services that are available to them. We have decided to allocate \$500 for these services in the 2018 City of Ogdensburg budget. We feel this is more than adequate given our limited LEP population and the limited frequency in which LEP persons come in contact with our employees. We will re-assess this allocation annually and adjust it based upon the frequency of the request for these services. The 2018 breakdown for these services is as follows:

Language Interpretation-Language Line-\$400  
Language Translation-Language Line-\$100

**A. Language Assistance Measures**

There are several language assistance measures that we will make available to our LEP population should the need arise. These include:

- Arranging for the availability of oral translators. We will use the pay as you go service from Language Line in times of need for oral translation.
- Posting notices in appropriate languages informing LEP persons of available services. Documents that need to be translated will be done so by either Language Line or Google Translate.

**B. Staff Training**

- To ensure the effective implementation of this plan, the City of Ogdensburg will properly train our staff upon orientation, on an as needed basis, and annually in the following:
- Our Language Assistance Plan-All employees responsible for answering the telephone will receive this training.

- Census demographic data about our LEP population-All employees responsible for answering the telephone will receive this training.
- Completion of the LEP log-All employees responsible for answering the telephone will receive this training.
- How to handle requests for services from our LEP population- All employees responsible for answering the telephone will receive this training.
- Responsibility to notify the City Manager's Office about any LEP persons with unmet needs- All employees responsible for answering the telephone will receive this training.

C. Notice to LEP persons about available language assistance

All facilities will post that our LEP persons will have access to the language assistance measures outlined above. Documents that can be translated are the Civil Rights complaint procedures and the Civil Rights complaint form. Translation will be completed by either using the service of Language Line of Google Translate. Should our employee log show the need, we will take the necessary steps to translate our public communications in the language(s) with which there is a documented need.

D. Annual Monitoring, Evaluating, and Updating Plan

The City of Ogdensburg will review this plan annually and will assess:

- Its effectiveness
- The appropriateness of the budget allocation
- A review of complaints from LEP persons

E. Dissemination of this Plan

This Language Assistance Plan will be available on our City's website, [www.ogdensburg.org](http://www.ogdensburg.org), and at no cost in English upon request by telephone, mail, e-mail, or in person.

F. Questions or comments about this plan may be submitted to:

Sarah Purdy, City Manager  
 The City of Ogdensburg  
 330 Ford Street, Room #1  
 Ogdensburg, NY 13669  
 (315)393-6100  
[spurdy@ogdensburg.org](mailto:spurdy@ogdensburg.org)

## Appendix D

### Public Dissemination of Information

The Title VI Coordinator shall assist City staff in the creation and dissemination of Title VI Program information to City employees, subrecipients, contractors, Affected Parties, and the general public. Public dissemination efforts may include: posting public statements setting forth the City's non-discrimination policy; inclusion of Title VI Assurances in City contracts and grants; and publishing a Title VI Policy Statement in a newspaper of general circulation in the City and in other community/minority publications at least once annually; posting a Title VI Policy Statement in vicinity of proposed City projects; and including a Title VI Policy Statement in announcements of hearings and meetings; and providing notice of City Proposed Projects to minority communities.

## Appendix E

### **Title VI Nondiscrimination Policy Statement**

It is the policy of the City of Ogdensburg to prevent and eliminate discrimination in all of its operations and services as well as all aspects of employment. All Department, Divisions, Offices, and Bureaus will plan, develop and implement their programs and activities so that no person is subjected to unlawful discrimination based on race, creed, color, gender, age, national origin, religion, disability, sexual orientation, marital status, or Vietnam era veteran status.

This policy fully incorporates throughout all of the City of Ogdensburg's operations the requirements of applicable State and Federal laws and executive orders to prohibit any discriminatory practices, procedures and policies. All administrators, managers, supervisors and employees are directed to comply with these laws and orders.

The City of Ogdensburg is committed to maintaining an agency which recognizes and values the inherent worth and dignity of every person; fosters tolerance, sensitivity, understanding, and mutual respect among its members; and encourages each individual to strive to reach their own potential.

This policy will be placed on all City of Ogdensburg bulletin boards and made available to all organizations and entities doing business with the City of Ogdensburg. Any complaints involving allegations of discrimination should be sent to Jennifer Ashley, the City of Ogdensburg Title VI Coordinator, 330 Ford Street, Room #11, Ogdensburg, NY 13669, (315) 393-7900.

#### **RELATED POLICY AND AUTHORITATIVE SOURCES**

##### **New York State Laws**

**New York State Human Rights law Article 15 (1945)** - Guarantees nondiscrimination in the State of New York on the basis of race, creed, color, national origin, sex, marital status, age, disability and or sexual orientation.

**New York State Law Article 15-A (1988)** - An act to amend the executive law and the state Finance law, in relation to participation by minority group members and women with respect to state contracts.

**New York State Law Article 17-B (2014)** - An Act to amend the executive law, in relation to expanding opportunities for service-disabled veteran-owned business enterprises.

**Sexual Orientation Non-Discrimination Act (2003)** - This Act amends the Executive Law to include sexual orientation.

### **New York State Executive Orders**

On January 1, 2011, Governor Cuomo issued Executive Order 2 that authorized the continuation of certain prior Executive Orders related to equal opportunity and nondiscrimination in all State programs.

**Executive Order No. 6 (Governor Cuomo, 1983)** - Insures equal employment opportunities for minorities, women, disabled persons and Vietnam era Veterans in State government. The order clarifies and expands the power of the President of the Civil Service Commission and the Governor's Executive Committee for Affirmative Action to ensure that agencies develop and implement effective affirmative action plans.

### **Federal Laws and Executive Orders**

**Civil Rights Act of 1964** - Prevents discrimination in federally assisted programs; provides relief against discrimination in public accommodations; protects constitutional rights in public facilities and public education; enforces the constitutional right to vote. Title VI - Prohibits discrimination on the grounds of race, color or national origin in programs and activities receiving federal financial assistance. Title VI as amended by the Equal Employment Opportunity Act of 1972 - Makes it unlawful to discriminate in employment practices on the basis of race, color, religion, sex, or national origin.

**Section 503 of the Rehabilitation Act of 1973** - Prohibits discrimination on the basis of physical or mental disability in every federally assisted program or activity in the country.

**Age Discrimination Act of 1975** - Prohibits discrimination on the basis of age in programs or activities receiving federal financial assistance.

**Civil Rights Restoration Act of 1988** - Specifies that recipients of federal funds must comply with civil rights laws in all areas, not just in a particular program or activity that receives federal funding. It applies to all federal laws.

**Americans with Disabilities Act (ADA) of 1990** - Federal Law prohibiting discrimination against people with disabilities in employment, public access to services, transportation, public accommodations, and telecommunications services.

**Civil Rights Act of 1991** - Provides appropriate remedies for intentional discrimination and unlawful harassment in the workplace; codifies the concepts of "business necessity" and "job related", confirms statutory authority and provide statutory guidelines for the adjudication of disparate impact suits under Title VI of the Civil Rights Act of 1964; expands the scope of relevant civil rights statutes in order to provide adequate protection to victims of discrimination. The Act provides for compensatory and punitive damages and jury trials in cases of sex, religious, and disability bias.

**Executive Order No. 11246** - Prohibits employers doing business with the Federal Government from discriminating in employment because of race, color, religion, sex or national origin. Employers are required to take affirmative action in employment activities including hiring, promotion, transfers, training and minorities and women.

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Chief Executive Officer

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Date

**Appendix F**  
**The United States Department of transportation (US DOT)**  
**Standard Title VI/Nondiscrimination Assurances**  
**DOT Order No.: 1050.2A**

The United States Department of Transportation (USDOT)

Standard Title VI/Nondiscrimination Assurances

DOT Order No. 1050.2A

The City of Ogdensburg (herein referred to as the "Recipient"), **HEREBY AGREES THAT**, as a condition to receiving any Federal financial assistance from the U.S. Department of Transportation (DOT), through RITA, is subject to and will comply with the following:

**Statutory/Regulatory Authorities**

- Title VI of the Civil Rights Act of 1964 (42 U.S.C. § 2000d *et seq.*, 78 stat. 252), (prohibits discrimination on the basis of race, color, national origin);
- 49 C.F.R. Part 21 (entitled *Nondiscrimination In Federally-Assisted Programs Of The Department Of Transportation-Effectuation Of Title VI Of The Civil Rights Act Of 1964*);
- 28 C.F.R. section 50.3 (U.S. Department of Justice Guidelines for Enforcement of Title VI of the Civil Rights Act of 1964);

***RITA may include additional Statutory/Regulatory Authorities here.***

The preceding statutory and regulatory cites hereinafter are referred to as the "Acts" and "Regulations," respectively.

**General Assurances**

In accordance with the Acts, the Regulations, and other pertinent directives, circulars, policy, memoranda, and/or guidance, the Recipient hereby gives assurance that it will promptly take any measures necessary to ensure 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 otherwise subjected to discrimination under any program or activity," for which the Recipient receives Federal financial assistance from DOT, including RITA.*

The Civil Rights Restoration Act of 1987 clarified the original intent of Congress, with respect to Title VI and other Nondiscrimination requirements (The Age Discrimination Act of 1975, and Section 504 of the Rehabilitation Act of 1973), by restoring the broad, institutional-wide scope and coverage of these nondiscrimination statutes and requirements to include all programs and activities of the Recipient, so long as any portion of the program is Federally assisted.



**RITA may include additional General Assurances in this section, or reference an addendum here.**

**Specific Assurances**

More specifically, and without limiting the above general Assurance, the Recipient agrees with and gives the following Assurances with respect to its federally assisted University Transportation Centers Program:

1. The Recipient agrees that each "activity," "facility," or "program," as defined in §§ 21.23 (b) and 21.23 (e) of 49 C.F.R. § 21 will be (with regard to an "activity") facilitated, or will be (with regard to a "facility") operated, or will be (with regard to a "program") conducted in compliance with all requirements imposed by, or pursuant to the Acts and the Regulations.
2. The Recipient will insert the following notification in all solicitations for bids, Requests For Proposals for work, or material subject to the Acts and the Regulations made in connection with all University Transportation Centers Program and, in adapted form, in all proposals for negotiated agreements regardless of funding source:

*The City of Ogdensburg, in accordance with the provisions of Title VI of the Civil Rights Act of 1964 (78 Stat. 252, 42 U.S.C. §§ 2000d to 2000d-4) and the Regulations, hereby notifies all bidders that it will affirmatively insure that any contract entered into pursuant to this advertisement, disadvantaged business enterprises will be afforded full opportunity to submit bids in response to this invitation and will not be discriminated against on the grounds of race, color, or national origin in consideration for an award.*

3. The Recipient will insert the clauses of Appendix A and E of this Assurance in every contract or agreement subject to the Acts and the Regulations.
4. The Recipient will insert the clauses of Appendix B of this Assurance, as a covenant running with the land, in any deed from the United States effecting or recording a transfer of real property, structures, use, or improvements thereon or interest therein to a Recipient.
5. That where the Recipient receives Federal financial assistance to construct a facility, or part of a facility, the Assurance will extend to the entire facility and facilities operated in connection therewith.
6. That where the Recipient receives Federal financial assistance in the form, or for the acquisition of real property or an interest in real property, the Assurance will extend to rights to space on, over, or under such property.
7. That the Recipient will include the clauses set forth in Appendix C and Appendix D of this Assurance, as a covenant running with the land, in any future deeds, leases, licenses, permits, or similar instruments entered into by the Recipient with other parties:
  - a. for the subsequent transfer of real property acquired or improved under the applicable activity, project, or program; and
  - b. for the construction or use of, or access to, space on, over, or under real property acquired or improved under the applicable activity, project, or program.
8. That this Assurance obligates the Recipient for the period during which Federal financial assistance is extended to the program, except where the Federal financial assistance is to provide, or is in the form of, personal property, or real property, or interest therein, or structures or improvements thereon, in which case the Assurance obligates the Recipient, or any transferee for the longer of the following periods:
  - a. the period during which the property is used for a purpose for which the Federal financial assistance is extended, or for another purpose involving the provision of similar services or benefits; or
  - b. the period during which the Recipient retains ownership or possession of the property.

9. The Recipient will provide for such methods of administration for the program as are found by the Secretary of Transportation or the official to whom he/she delegates specific authority to give reasonable guarantee that it, other recipients, sub-recipients, sub-grantees, contractors, subcontractors, consultants, transferees, successors in interest, and other participants of Federal financial assistance under such program will comply with all requirements imposed or pursuant to the Acts, the Regulations, and this Assurance.
10. The Recipient agrees that the United States has a right to seek judicial enforcement with regard to any matter arising under the Acts, the Regulations, and this Assurance.

***RITA may include additional Specific Assurances in this section.***

By signing this ASSURANCE, City of Ogdensburg also agrees to comply (and require any subrecipients, sub-grantees, contractors, successors, transferees, and/or assignees to comply) with all applicable provisions governing the ***RITA*** access to records, accounts, documents, information, facilities, and staff. You also recognize that you must comply with any program or compliance reviews, and/or complaint investigations conducted by ***RITA***. You must keep records, reports, and submit the material for review upon request to ***RITA***, or its designee in a timely, complete, and accurate way. Additionally, you must comply with all other reporting, data collection, and evaluation requirements, as prescribed by law or detailed in program guidance.

City of Ogdensburg gives this ASSURANCE in consideration of and for obtaining any Federal grants, loans, contracts, agreements, property, and/or discounts, or other Federal-aid and Federal financial assistance extended after the date hereof to the recipients by the U.S. Department of Transportation under the ***University Transportation Centers Program***. This ASSURANCE is binding on City of Ogdensburg, other recipients, sub-recipients, sub-grantees, contractors, subcontractors and their subcontractors', transferees, successors in interest, and any other participants in the ***University Transportation Centers Program***. The person signing below is authorized to sign this ASSURANCE on behalf of the Recipient.

*Name of Recipient:* City of Ogdensburg

*Signature of Authorized Official:* \_\_\_\_\_

*Date:* \_\_\_\_\_

## APPENDIX G

### CITY OF OGDENSBURG

#### AMERICANS WITH DISABILITIES ACT (ADA) TRANSITION PLAN

##### ADA Transition Plan

This ADA Transition Plan reflects the *City of Ogdensburg's* long-term commitment to ADA compliance, and details the stages of the *City of Ogdensburg's* plan and timeline for: (1) evaluating accessibility by identifying any structural barriers associated with public facilities; (2) identifying accommodations and/or modifications that can be provided to make programs and services accessible; and (3) prioritizing the remediation of any deficiencies and formulating a budget and schedule for those improvements.

This Draft ADA Transition Plan will be revised and updated as the steps of the Plan are completed.

##### INTRODUCTION

ADA regulations prohibit discrimination against individuals on the basis of disability and require state and local governments to make their programs and services accessible to persons with disabilities. These requirements focus on providing accessibility by addressing and eliminating structural barriers associated with public facilities.

As detailed below, the *City of Ogdensburg* has made a significant and long-term commitment to improving the accessibility of its public facilities. The purpose of this Plan is to ensure that the *City of Ogdensburg* identifies prohibited structural barriers to its public facilities, and, where structurally feasible, schedules and implements ADA-required improvements in order to remove those barriers.

The ADA requires that the Transition Plan include the following components:

- 1) Identification of physical barriers in a public entity's facilities that limit the accessibility of its programs, activities, or services to individuals with disabilities;
- 2) Identification of the methods to be used to remove any barriers limiting accessibility;
- 3) A schedule for completion of the necessary steps to achieve accessibility in public facilities; and
- 4) The name of the public entity's ADA Coordinator.

## STEP 1: IDENTIFICATION OF PHYSICAL BARRIERS IN CITY OF OGDENSBURG'S FACILITIES

The first phase of the ADA Transition Plan is to evaluate the *City of Ogdensburg's* public facilities for accessibility. Officials from Planning, Public Works, and Human Resources Departments will coordinate to conduct accessibility evaluations of the following facilities:

- Sidewalks, crosswalks, and curb ramps
- Publicly accessible buildings
- Parking lots serving publicly accessible buildings

For each facility evaluated, a Survey of the *City of Ogdensburg* Public Facilities ("the Survey") will be completed. Any deficiencies, suggested improvements, and observations relating to structural feasibility of improvements will be noted and recorded on the Survey. An Inventory of Public Facilities ("the Inventory") will also be created, and will serve as the central database for identified structural barriers, suggested improvements, and comments relating to structural feasibility of improvements.

### Evaluation of Sidewalks, Crosswalks, and Curb Ramps

The Survey will contain the following ratings to assess the condition of each *City of Ogdensburg* sidewalk, crosswalk, and curbramp:

**Rating 1 - Not Applicable:** A facility not considered to require accessibility, for example, limited-access highways.

**Rating 2 - Not Accessible:** Significant discontinuity such as steps, no ramps, more than 100 feet of unpaved walkway, heaving, vertical displacement, other severe distress, flooding, etc.

**Rating 3 - Partially Accessible:** Not designed to current standards, problems with geometry of sidewalks, ramps and landings, no detectable warnings, handrails, etc.

**Rating 4 - Accessible:** May need additional improvements, for example circuitous routes, insufficient width, etc.

**Rating 5 - Fully Accessible:** Designed to current standards, but reasonable accommodations may still be required for individual cases.

## Evaluation of Parking Lots and Publicly Accessible Buildings

For the evaluation of publicly accessible buildings and the parking lots serving those buildings, the Survey will incorporate relevant portions of the ADA Checklist for Existing Facilities (based on the 2010 ADA Standards for Accessible Design), produced by the Institute for Human Centered Design.

### Schedule for Completion

**City of Ogdensburg** officials from its Planning, Public Works, and Engineer Departments will be coordinating over the next several months to evaluate public buildings, parking lots, sidewalks, crosswalks, and curb ramps. Numerous facilities will be subject to this evaluation, and consequently this will be a substantial undertaking for the reviewing officials. The evaluations will be scheduled so as to evaluate outdoor facilities prior to the winter months (to avoid snow cover that may impede a thorough review), with any remaining evaluations of outdoor facilities to be completed by October 31, 2017. Evaluations of indoor facilities will continue during the winter months. Therefore, it is estimated that Step 1 will be completed by December 31, 2017.

## **STEP 2: IDENTIFICATION OF METHODS TO REMOVE BARRIERS**

The second phase of the **City of Ogdensburg** ADA Transition Plan is to develop a method to remove barriers. This includes identification of the nature of needed improvements and a determination regarding structural feasibility of improvements under the ADA standards, and prioritization of necessary improvements.

Once the necessary improvements have been identified and prioritized, this information, along with a list of any improvements determined to be physically unfeasible, will be presented at a public meeting of the **City of Ogdensburg's** Compliance Committee. It is the **City of Ogdensburg's** practice to provide public notice of the dates and agendas of Compliance Committee meetings on the **City of Ogdensburg's** website. This will provide the public with an opportunity to participate in the formulation of the ADA Transition Plan.

### **A. Nature of Improvements and Structural Feasibility**

The nature of necessary improvements will be determined during Step 1 - the accessibility evaluation of **City of Ogdensburg** facilities - and will be incorporated into the ADA Transition Plan after completion of Step 1. Any improvements that **City of Ogdensburg** officials determine are not structurally feasible, based on ADA regulations, will also be incorporated into the Plan.

## **B. Priority of Improvements**

### Sidewalks; Crosswalks; Curb Ramps

With respect to sidewalks, crosswalks and curb ramps, the primary focus of this ADA Transition Plan is to address all ADA noncompliant facilities, defined as those locations that have a rating of "2" and "3" on the scale discussed above.

The priority of improvements to these facilities will be as follows:

- 1) Those serving publicly accessible **City of Ogdensburg** facilities;
- 2) Those serving commercial and employment centers; and
- 3) Those serving other areas.

### Parking Lots and Publicly Accessible Buildings

The priority of improvements to parking lots and publicly accessible spaces in the **City of Ogdensburg** buildings will be based on the severity of the accessibility barrier and the frequency of public presence at the facility. Notably, the general assessment of the **City of Ogdensburg** Code Enforcement Officer is that **City of Ogdensburg** facilities where public meetings take place are in substantial compliance with the ADA. All new construction or renovations to existing facilities have complied with ADA standards. As such, the **City of Ogdensburg** does not expect that its publicly accessible buildings and parking lots will require major structural improvements.

## **STEP 3: SCHEDULE FOR COMPLETION OF NECESSARY IMPROVEMENTS**

Once the Inventory of Public Facilities has been completed, and necessary improvements have been prioritized as provided above, the **City of Ogdensburg** will formulate an estimated budget for the improvements. The schedule for improvements will depend heavily upon the number and severity of the deficiencies identified during the accessibility evaluation, and the costs associated with the improvements. The **City of Ogdensburg** however, reiterates its commitment to making its public facilities accessible to all persons, regardless of disability. The **City of Ogdensburg's** ADA Transition Plan will outline a specific schedule for improvements after Completion of Step 2, and this schedule will reflect the **City of Ogdensburg's** commitment to ADA compliance.

### ADA COORDINATOR

The **City of Ogdensburg** ADA Coordinator is **Sarah Purdy, City Manager.**

**Sarah Purdy, ADA Coordinator**

**City of Ogdensburg**

**330 Ford Street, Room #1**

**Ogdensburg, NY 13669**

**(315) 393-6100**

**[spurdy@ogdensburg.org](mailto:spurdy@ogdensburg.org)**

APPENDIX H

# Employee Training Plan

Title VI of the Civil Rights Act of 1964

**City of Ogdensburg  
330 Ford Street, Room #1  
Ogdensburg, NY 13669  
Phone: (315) 393-6100  
Fax: (315) 393-1136  
Email: [spurdy@ogdensburg.org](mailto:spurdy@ogdensburg.org)**

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## **Introduction**

Title VI of the 1964 Civil Rights Act provides that "No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance (Sec. 601)."

The Civil Rights Restoration Act of 1987 amended Title VI to specify that entire institutions receiving Federal funds, whether schools, colleges, government entities, or private employers must comply with Federal civil rights laws, rather than just the particular programs or activities that receive federal funds.

This Title VI Employee Training Plan has been prepared to address the City of Ogdensburg's responsibility to provide Title VI training to all of its current employees.

## **Title VI and ADA Nondiscrimination Statement**

The City of Ogdensburg adheres to the Title VI of the Civil Rights Act of 1964 Compliance Plan. The City of Ogdensburg carries out its transportation planning processes without regard to race, color, or national origin. For more information or to file a complaint or concern, please contact the City of Ogdensburg Title VI Civil Rights Coordinator, at (315) 393-6100.

The City of Ogdensburg also follows the New York State Department of Transportation's Americans with Disabilities Act Grievance Procedure. The City of Ogdensburg hosts its public meetings and open houses in facilities allowing access for those who may be mobility impaired, sight impaired, hearing impaired or mentally impaired. The City of Ogdensburg will accommodate anyone who may need special requests with adequate notification, preferably 48 hours before a scheduled meeting or open house.

The City of Ogdensburg is committed to a policy of non-discrimination in conducting its business, including its Title VI responsibilities. The City of Ogdensburg recognizes its responsibilities to the citizens for whom it carries out its transportation planning processes and to the society it serves.

### **Education and Training**

The Title VI Coordinator and the City Manager shall be responsible for advising City of Ogdensburg staff about available training in support of Title VI. It is the responsibility of the Title VI Coordinator to schedule training in such a way that appropriate notices and announcements are made to City of Ogdensburg staff. All employees are encouraged to participate in professional development training within and outside of the City of Ogdensburg.

Internally, the City of Ogdensburg offers a Title VI training put on by the Title VI Coordinator in accordance to Title VI and ADA requirements. This training has also been video recorded to allow for any staff to watch and review Title VI and ADA requirements. This training is reviewed and updated as necessary by the Title VI Coordinator. It is also a requirement for current City of Ogdensburg staff to participate and refresh themselves in the Title VI training annually. The Title VI training can be put on by the Title VI Coordinator or the Title VI training can be accomplished by watching a Title VI training video. It is a requirement for new employees to participate in the Title VI training or watch the training video within 60 days of hire with the City of Ogdensburg.

In an effort to continuously improve the City of Ogdensburg's overall Title VI compliance requirement, nondiscrimination training will be coordinated with the New York State Department of Transportation (NYSDOT), Federal Highway Administration (FHWA), and Federal Transit Administration (FTA). The training will be made available to City of Ogdensburg staff on an ongoing basis to ensure up to date knowledge of Title VI and other nondiscrimination statutes.

## Appendix A: Title VI Complaint Procedure

The Complaint Procedure meets the requirements of the Civil Rights Act of 1964 and its amendments. It may be used by anyone who wishes to file a complaint alleging discrimination on the basis of race, color, or national origin in the provision of services, activities, programs, or benefits by the City of Ogdensburg. Complaints regarding transit-related concerns are governed by special requirements from the FTA. If you are unsure about the appropriate office to address a complaint to or if you need assistance navigating procedures, complaints of any type can be filed with the New York State Human Rights Commission.

Should a citizen have a complaint about access to public services, they should complete the attached complaint form and submit it to the City of Ogdensburg's Title VI Coordinator. The complaint should be in writing and contain information about the alleged discrimination such as name, address, phone number of complainant, location, date, and description of the problem. The attached form provides spaces for all necessary information.

The complaint should be submitted by the complainant or their designee as soon as possible but no later than 60 calendar days after the alleged violation to:

Title VI Coordinator  
City of Ogdensburg  
330 Ford Street, Room #1  
Ogdensburg, NY 13669

Within 30 calendar days after receipt of the complaint, the Title VI Coordinator or their designee will meet with the complainant to discuss the complaint and possible resolutions. Within 15 calendar days of the meeting, the Title VI Coordinator or their designee, in consultation with the City of Ogdensburg's Legal Office, will respond in writing. The response will explain the position of the Coordinator and other options for substantive resolution of the complaint.

If the response by the Title VI Coordinator or their designee does not satisfactorily resolve the issue, the complainant and/or their designee may appeal the decision within 15 calendar days after receipt of the response to the City of Ogdensburg, City Title VI Appeals Committee. The appeal should take the form of a written letter describing the initial complaint, the initial response, and the ways in which the initial response does not satisfactorily address the complaint. The appeal should be sent to the same address the initial complaint was delivered to.

The Title VI Appeals Committee will consist of representatives from three departments not involved in the complaint. The departments will be chosen at random. The three representatives will choose one individual among them to serve as chair of the committee. The Legal Office will serve to advise the committee.

Within 30 calendar days after receipt of the appeal, the City of Ogdensburg's Title VI Appeals Committee will meet with the complainant to discuss the complaint and possible resolutions. Within 15 calendar days after the meeting, the City of Ogdensburg's Title VI Appeals Committee will respond in writing.

All complaints received by the Title VI Coordinator or their appeals to Title VI Appeals Committee, and responses from these two offices will be retained by the City Clerk's Office for at least five years.

Title VI of the 1964 Civil Rights Act  
Discrimination Complaint Form

Instructions: Please fill out this form in black ink or type. Sign and return to the address on the next page. Alternate means of filing a complaint, such as a personal interview or audio recording, will be made available upon request.

Name of Complainant: \_\_\_\_\_

Person Filing Complaint: \_\_\_\_\_  
(if other than complainant)

Address: \_\_\_\_\_

City, State, & Zip: \_\_\_\_\_

Home phone: \_\_\_\_\_ Mobile Phone: \_\_\_\_\_

Agency Department/Departments you believe have discriminated.

\_\_\_\_\_

Where did the alleged discrimination take place?

\_\_\_\_\_

When did the alleged discrimination occur? (Date/Time) \_\_\_\_\_

Describe the acts of discrimination providing the name(s) where possible of the individuals who allegedly discriminated (if applicable) or services in violation of the 1964 Civil Rights Act or its amendments. Attach additional pages if necessary. \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Has the complaint been filed with another bureau of the Department of Justice or any other Federal, State, or local civil rights agency or court?

Yes            No

If yes, with what agency or court?

\_\_\_\_\_

Contact Person: \_\_\_\_\_

Address: \_\_\_\_\_

City, State, Zip: \_\_\_\_\_

Telephone Number: \_\_\_\_\_

Date Filed: \_\_\_\_\_

Do you intend to file with another agency or court? \_\_\_\_\_

Agency or Court: \_\_\_\_\_

Address: \_\_\_\_\_

City, State, Zip: \_\_\_\_\_

Telephone Number: \_\_\_\_\_

Signature \_\_\_\_\_

Date \_\_\_\_\_

Return To: Title VI Coordinator  
City of Ogdensburg  
330 Ford Street, Room #11  
Ogdensburg, NY 13669

## SCHEDULE OF TITLE VI TRAINING

Date	<u>Target Audience</u>
3/23/2017	Jennifer Ashley <i>Contract Compliance &amp; Engineering Services</i>
3/23/2017	Scott Thornhill <i>Design, Maintenance, Right-of-Way, Environmental Services &amp; Safety</i>
3/23/2017	Sarah Purdy <i>City Manager/Chief Executive Officer</i>

