

CITY OF WESTLAND

LIMITED ENGLISH PROFICIENCY (LEP) PLAN

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Introduction

On August 11, 2000, President William J. Clinton signed an executive order, Executive Order 13166: Improving Access to Service for Persons with Limited English Proficiencyⁱ, to clarify Title VI of the Civil Rights Act of 1964. It had as its purpose, to ensure accessibility to programs and services to otherwise eligible persons who are not proficient in the English language.

This executive order stated that individuals who do not speak English well and who have a limited ability to read, write and speak, or understand English are entitled to language assistance under Title VI of the Civil Rights Act of 1964 with respect to a particular type of service, benefit, or encounterⁱⁱ. These individuals are referred to as being limited in their ability to speak, read, write, or understand English, hence the designation, "LEP," or Limited English Proficient. The Executive Order states that:

"Each federal agency shall prepare a plan to improve access to its federally conducted programs and activities by eligible LEP persons. Each plan shall be consistent with the standards set forth in the LEP Guidance, and shall include the steps the agency will take to ensure that eligible LEP persons can meaningfully access the agency's programs and activities."

Not only do all federal agencies have to develop LEP plans as a condition of receiving federal financial assistance, recipients have to comply with Title VI and LEP guidelines of the federal agency from which funds are provided as well.

Federal financial assistance includes grants, training, use of equipment, donations of surplus property, and other assistance. Recipients of federal funds range from state and local agencies, to nonprofits and organizations. Title VI covers a recipient's entire program or activity. This means all parts of a recipient's operations are covered, even if only one part of a recipient's organization receives the federal assistance. Simply put, any organization that receives federal financial assistance is required to follow this Executive Order.

The City of Westland receives funds from the US Department of Transportation via the Federal Highway Administration.

The US Department of Transportation published *Policy Guidance Concerning Recipients' responsibilities to Limited English Proficient Person* in the December 14th, 2005 Federal Register.ⁱⁱⁱ

The Guidance implies that the City of Westland is an organization that must follow this guidance:

This guidance applies to all DOT funding recipients, which include state departments of transportation, state motor vehicle administrations, airport operators, metropolitan planning organizations, and regional, state, and local transit operators, among many others. Coverage extends to a recipient's entire program or activity, i.e., to all parts of a recipient's operations.

This is true even if only one part of the recipient receives the Federal assistance. For example, if DOT provides assistance to a state department of transportation to rehabilitate a particular highway on the National Highway System, all of the operations of the entire state department of transportation—not just the particular highway program or projects—are covered by the DOT guidance.

Elements of an Effective LEP Policy

The US Department of Justice, Civil Rights Division has developed a set of elements that may be helpful in designing and LEP policy or plan. These elements include:

1. Identifying LEP persons who need language assistance
2. Identifying ways in which language assistance will be provided
3. Training Staff
4. Providing notice to LEP persons
5. The recommended method of evaluating accessibility to available transportation services is the Four-Factor Analysis identified by the USDOT.

These recommended plan elements have been incorporated into this plan.

Methodology for Assessing Needs and Reasonable Steps for an Effective LEP Policy

The DOT guidance outlines four factors recipients should apply to the various kinds of contacts they have with the public to assess language needs and decide what reasonable steps they should take to ensure meaningful access for LEP persons:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the recipient or grantee.
2. The frequency with which LEP individuals come in contact with the program.
3. The nature and importance of the program, activity, or service provided by the recipient to the LEP Community.
4. The resources available to the City of Westland and overall cost.

The greater the number or proportion of eligible LEP persons; the greater the frequency with which they have contact with a program, activity, or service and the greater the importance of that program, activity, or service, the more likely enhanced language services will be needed. The intent of DOT's guidance is to suggest a balance that ensures meaningful access by LEP persons to critical services while not imposing undue burdens on small organizations and local governments.

Smaller recipients with more limited budgets are typically not expected to provide the same level of language service as larger recipients with larger budgets.

The DOT guidance is modeled after the Department of Justice's guidance and requires recipients and sub recipients to take steps to ensure meaningful access of their programs and activities to LEP persons. More information for recipients and sub recipients can be found at <http://www.lep.gov>.

The Four-Factor Analysis

This plan uses the recommended four-factor analysis of an individualized assessment considering the four factors outlined above. Each of the following factors is examined to determine the level and extent of language assistance measures required to sufficiently ensure meaningful access to City of Westland services and activities that may affect their quality of life. Recommendations are then based on the results of the analysis.

Factor 1: The Proportion, Numbers and Distribution of LEP Persons

The Census Bureau has a range of four classifications of how well people speak English. The classifications are: 'very well,' 'well,' 'not well,' and 'not at all.' For our planning purposes, we are considering people that speak English less than 'very well' as Limited English Proficient persons.

As seen in Table #1, the Census 2011 Data for City of Westland shows that 7,566 (9.6%) individuals speak a language other than English; of that group 2,027 individuals (2.6%) have identified themselves as speaking English less than 'very well.' The itemization below shows that 1,045 individuals (1.3%) consisting of the Indo-European languages group, followed by the Asian and Pacific Islander languages group with 595 individuals (0.8%), then by the Spanish language group representing 268 individuals (0.3%), and finally by 199 individuals (0.2%) in the Other languages group.

TABLE #1

LANGUAGE SPOKEN AT HOME	# of Individuals	Percent
Population 5 years and over	79,220	100%
English only	71,654	90.4%
Language other than English	7,566	9.6%
Speak English less than "very well"	2,027	2.6%
Spanish	1,576	2.0%
Speak English less than "very well"	268	0.3%
Other Indo-European languages	3,166	4.0%
Speak English less than "very well"	1,045	1.3%
Asian and Pacific Islander languages	1,869	2.4%

Speak English less than "very well"	595	0.8%
Other languages	955	1.2%
Speak English less than "very well"	199	0.2%

Factor 2: Frequency of Contact with LEP Individuals

The City has conducted an informal survey of their employees with regard to whether they have had encounters with LEP individuals in the performance of their job functions and found that our employees have had encounters with LEP individuals. We have offices accessible to the public and therefore accessible to LEP individuals and we have staff that work in the field that could encounter LEP individuals. Additionally, regular meetings of City Council are held the first and third Mondays of each month which would potentially bring LEP individuals to these meetings. Given the significant concentration of LEP individuals as displayed in Table #1 (above) the probability of our employees encountering an LEP individual is high.

Factor 3: The Nature and Importance of the Program, Activity, or Service to LEP

The City of Westland serves individuals throughout the City in a variety of ways including managing roads, water, sewer, police, fire, elections, and other services to citizens of the City and individuals from outside of the city, such as visitors and those traversing the state. The nature of the services that the City provides is very important to an individual’s day-to-day life. Therefore the denial of services to an LEP individual could have a significant detrimental effect. Given the high concentration of LEP language groups in the city, we will ensure accessibility to all of our programs, services, and activities.

Factor 4: The Resources Available to the City of Westland and Overall Cost

US Department of Transportation Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient (LEP) Persons published in the Federal Register: December 14, 2005 (Volume 70, Number 239) states:

“A recipient’s level of resources and the costs imposed may have an impact on the nature of the steps it should take in providing meaningful access for LEP persons. Smaller recipients with more limited budgets are not expected to provide the same level of language services as larger recipients with larger budgets. In addition, “reasonable steps” may cease to be reasonable where the costs imposed substantially exceed the benefits. Recipients should carefully explore the most cost-effective means of delivering competent and accurate language services before limiting services due to resource concerns.”

Based on this guidance, we have reviewed our resources and deemed that given the high concentration of LEP individuals in our city, upon request we will translate our vital documents into the language requested to ensure accessibility.

Although there will not be a fixed amount allocated from our yearly budget for the translation of documents. The cost associated with the necessary translation of document in order to comply with LEP requirements will be allocated on an as-needed basis.

Safe Harbor Stipulation

Federal law provides a “Safe Harbor” situation so that recipients can ensure with greater certainty that they comply with their obligation to provide written translations in languages other than English. A “safe harbor” means that if a recipient provides written translation in certain circumstances, such action will be considered strong evidence of compliance with the recipient’s written-translation obligations under Title VI.

The failure to provide written translations under the circumstances does not mean there is noncompliance, but rather provides a guide for recipients that would like greater certainty of compliance than can be provided by a fact-intensive, four factor analysis. For example, even if a safe harbor is not used, if written translation of a certain document(s) would be so burdensome as to defeat the legitimate objectives of its program, it is not necessary. Other ways of providing meaningful access, such as effective oral interpretation of certain vital documents, might be acceptable under such circumstances.

Strong evidence of compliance with the recipient’s written translation obligations under “Safe Harbor” includes providing written translations of vital documents for each eligible LEP language group that constitutes 5% or 1,000, whichever is less, of the population of persons eligible to be served or likely to be affected or encountered. Translation of other documents, if needed, can be provided orally.

This “safe harbor” provision applies to the translation of written documents only. It does not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable.

Given the high concentration of LEP individual (as seen above in Table #1), we have deemed that written translations of all vital documents should be made upon request for translation. The City of Westland will translate all vital documents which will include, but not be limited to: the complaint form, complaint procedures, and all public meeting notices.

Providing Notice to LEP Persons

USDOT LEP guidance says:

Once an agency has decided, based on the four factors, that it will provide language service, it is important that the recipient notify LEP persons of services available free of charge. Recipients should provide this notice in languages LEP persons would understand.

The guidance provides several examples of notification including:

1. Signage in languages that an LEP individual would understand when free language assistance is available with advance notice.
2. Stating in outreach documents that free language services are available from the agency.
3. Working with community-based organizations and other stakeholders to inform LEP individuals of the recipient's services, including the availability of language assistance services.

Statements in languages that an LEP individual would understand will be placed in public information and public notices that persons requiring language assistance or special accommodations will be provided, with reasonable advance notice to the City of Westland.

Options and Proposed Actions

Options:

Federal fund recipients have two (2) main ways to provide language services: oral interpretation either in person or via telephone interpretation service and written translation. The correct mix should be based on what is both necessary and reasonable in light of the four-factor analysis.^{iv}

City of Westland defines an interpreter as a person who translates spoken language orally, as opposed to a translator, who translates written language and who transfers the meaning of written text from one language into another. The person who translates orally is not a translator, but an interpreter.^v

Considering the relatively small scale of the City of Westland, the high concentration of LEP individuals in the service area, and limited financial resources, it is necessary to limit language aid to the most basic and cost-effective services. Other than the previously mentioned vital documents, if there are additional language assistance measures required for the LEP individuals, the City shall proceed with oral interpretation options to meet all request for those language groups to ensure equal access while also complying with LEP regulations.

What the City of Westland will do. What actions will the City of Westland take?

- Notify the public that interpreter services are available upon request, with seven day advance notice.
- With advance notice of seven calendar days, the City will provide interpreter services at public meetings, including language translation and signage for the hearing impaired.
- The City will utilize the *Translators Resource List* as provided by MDOT for translation services and verbal interpretation.
- The Census Bureau “I-speak” Language Identification Card will be distributed to all employees that may potentially encounter LEP individuals.
- Once the LEP individual’s language has been identified, an agency from the Translator’s Resource List will be contacted to provide interpretation services.
- Publications of the city’s complaint form will be made available online and upon request.
- In the event that a City employee encounters a LEP individual, they will follow the procedure listed below:

OFFICE ENCOUNTER

1. Provide an I-speak language identification card to determine the language spoken of the LEP individual.
2. Once the foreign language is determined, provide information to Title VI coordinator who will contact an interpreter from MDOT’s *Translators Resource List*.
3. If the need is for a document to be translated, the Title VI coordinator will have the document translated and provided to the requestor as soon as possible.

ROAD ENCOUNTER

1. Road crew employee will immediately contact the Title VI coordinator for assistance, and provide an I-speak language identification card to the LEP individual to determine the language spoken of the individual.
2. Once the foreign language is determined, provide information to Title VI coordinator who will contact an interpreter from MDOT’s *Translators Resource List* to provide telephonic interpretation.
3. If the need is for a document to be translated, the Title VI coordinator will have the document translated and provided to the requestor as soon as possible.

IN WRITING

1. Once a letter has been received it will be immediately forwarded to the Title VI Coordinator.
2. The Title VI Coordinator will contact an translator from the MDOT's *Translators Resource List* to determine the specifics of the letter request information.
3. The Title VI Coordinator will work with the selected agency to provide the requested service to the individual in a timely manner.

OVER THE PHONE

1. If someone calls into our office speaking another language every attempt will be made to keep that individual on the line until an interpreter can be conferenced into the line and if possible determine the language spoken of the caller.
2. Once the language spoken by the caller has been identified, we will proceed with providing the requested assistance to the LEP individual.

City of Westland's Staff Training

City of Westland's staff will be provided training or made aware of the requirements for providing meaningful access to services for LEP persons.

LEP Plan Access

A copy of the LEP plan document can be requested at City of Westland's main office (City Hall) during normal business hours and the City of Westland will make the plan available on the website at www.cityofwestland.com. Any person or agency may also request a copy by contacting:

Cindy C. King
Director of Personnel/Title VI Coordinator
Phone: 734-467-3225
Fax: 734-466-7946
Email: cking@cityofwestland.com

APPENDIX G - TRANSLATOR'S RESOURCE LIST

Translators do not have to be on the Translators Resource List to be acceptable, but they must be a community or government agency, attorney, college, university, or *translation-related* business. Translators are **not** certified by the Michigan Department of State. When providing acceptable translated documents to the City of Westland the translation must:

- Be on the letterhead stationery of the agency that employs the translator and include the address of the agency. The letterhead on which the translation appears must also be translated if it is in the translated foreign language.
- Include the legibly printed name and signature of the person who prepared the translation.
- Include a daytime telephone number where the translator may be reached.
- Include the date the translation was prepared.

Translations do not need to be notarized. A translation does not have to be prepared by an agency in Michigan or the United States. Translations prepared in other countries are acceptable if they meet the requirements stated above.

The agencies listed below may charge a fee for translating documents. Please inform your customer to ask the agency about any fees they may be expected to pay.

Note: An organization or individual not on this list may provide translations if they meet the requirements listed above. The agencies and information on this list are subject to change without notice. Please check the yellow pages of your local telephone directory under "Translations" or "Translators" for other resources that may be available in your area. Translation services may also be available from local community agencies, colleges, universities, attorneys, and government agencies.

AGENCY	CITY	TELEPHONE NUMBER	LANGUAGES
A&D Translation Consultants	Southfield	(248) 790-9371	Italian, Portuguese, Spanish
AA Translations	Ann Arbor	(734) 665-7295	Any language
Access International Language Institute	Ann Arbor	(734) 994-1456	Any language
Ace Notary and Tax Service	Detroit	(313) 841-8883	Spanish
Acumen Capital Associates, Inc.	Detroit	(313) 506-2339	Any language
Amine Translation Services, LLC	Clinton Twp	(586) 792-3884	Arabic
Annaseeha Consultants	Detroit	(313) 923-2905	Arabic, Somali
Arab-American & Chaldean Council	Lathrup Village	(248) 559-0960 (248) 559-1990	Arabic, Chaldean
Aress Academy	Southfield	(248) 876-0012	Arabic, Bosnian, Hindi, Nigerian, Pashto, Polish, Punjabi, Russian, Somali, Spanish, Urdu
Atlantic Translations	Dearborn	(313) 520-3030	Albanian, French, German, Greek, Italian, Macedonian, Romanian, Spanish, Turkish
Babel Latina Inc. Language Services	Ann Arbor	(734) 995-0373 (734) 417-6176	Any language
Baker College	Flint	(810) 766-4160 (810) 766-4159	Taiwanese

AGENCY	CITY	TELEPHONE NUMBER	LANGUAGES
Bi-Lingual Communications	Auburn Hills	(248) 364-4178	Spanish
Boloms Globalnet, Inc.	Detroit	(313) 341-4777	Arabic, French, German, Italian, Portuguese, Spanish
Brazilian Portuguese Language Services	Whitmore Lake	(810) 231-6596	Portuguese
Bromberg and Associates	Southfield	(313) 871-0080	Any language
Catholic Social Services of Oakland	Pontiac	(248) 338-4250	Spanish
Centro Hispano	Waterford	(248) 618-9273	Spanish
Coin a Phrase Language Services	Livonia	(734) 968-8264	French
Danka International	Hamtramck	(313) 871-0080 1 pm - 9 pm	Any language
Devonshire Productions	West Bloomfield	(248) 910-1655	Spanish
Diaspora Services	Livonia	(313) 506-5065	French, Italian, Moldavian, Romanian
Direct immigration and Translation Services	Lathrup Village	(248) 395-2278 (278) 395-2279 (278) 736-3038	Arabic
Diversified Graphix	Troy	(248) 879-6702	Portuguese
Eastern Michigan University	Ypsilanti	(734) 487-0130	French, German, Japanese, Spanish
Executive Language Services, Inc.	Southfield	(248) 357-0625	Any language
Forefront Corporation	Ann Arbor	(248) 705-2605	Dutch, French, German
German Communications	Auburn Hills	(248) 377-4306	German
German-English-Translations-Services LLC	Rochester Hills	(248) 613-0427	German
Global ATR, Inc.	Sterling Heights	(586) 795-8100	Any language
Global Language Links, LLC	Troy	(248) 430-0129	Any language
Horizon Solutions3, Inc.	Sterling Heights	(586) 978-8333	Albanian, Arabic, Bosnian, Chaldean, Filipino, French, German, Italian, Japanese, Korean, Macedonian, Polish, Romanian, Spanish, Turkish
International Translating Bureau	Southfield	(248) 559-1677	Any language
International Translation Services	Dearborn	(313) 563-7850	Bosnian (Serbo-Croatian), Croatian, Macedonian, Serbian
International Translations & Services	Sterling Heights	(586) 202-0512 (586) 726-7564	Albanian, Italian, Polish, Russian, Spanish
Interpress, Inc.	Detroit and Harper Woods	(313) 365-4547	Albanian, Arabic, Bosnian (Serbo-Croatian), Czech, French, German, Italian, Japanese, Lithuanian, Mandarin, Polish, Russian, Slovak, Spanish, Ukrainian

AGENCY	CITY	TELEPHONE NUMBER	LANGUAGES
Interpreter/Translator Services, Inc.	Grosse Pointe Park	(313) 331-4285 (313) 821-5521	Albanian, Arabic, Bosnian (Serbo-Croatian), Chinese, Czech, French, German, Hindi, Italian, Japanese, Macedonian, Polish, Portuguese, Romanian, Russian, Spanish, Vietnamese
J & M Service	Westland	(734) 522-4524	Spanish
J & S Translations	Belleville	(734) 796-0310	Spanish
Kan Group	Detroit	(313) 566-0546	Any language
KNE Translating Services	Sterling Heights	(586) 979-5229	Any language
LaOficina	Detroit	(313) 554-0060	Arabic, French, German, Portuguese, Spanish
Language Center International	Southfield	(248) 355-5506	Any language
Latin-Americans for Social and Economic Development, Inc. (La Sed)	N/A	N/A	N/A
Lingua Science	Ann Arbor	(734) 930-1553	Japanese
Lutheran Social Services of Michigan	Southfield	(248) 423-2790	Albanian, Arabic, Bosnian (Serbo-Croatian), Chaldean, French, Romanian, Spanish, Vietnamese
MGR Translation	Hamtramck	(313) 673-9072	Polish
Mi Reina, LLC	Milford	(248) 361-3979	Spanish
Michigan State University	East Lansing	(517) 353-0740 (517) 353-8351 (517) 355-8350	Arabic, Chinese, German, Japanese, Russian, Swahili French, Greek, Italian Portuguese, Spanish
Monroe Community College	Monroe	(734) 384-4153	French, German
Multilingual Services	Walled Lake	(248) 722-1471 (248) 960-0488	Russian, Ukrainian
Musashi International, Inc.	Southfield	(248) 358-1911	Japanese
Olas Translations	Ann Arbor	(734) 213-5396	Spanish
Oie Servicios Latinoamericanos Translation	Ypsilanti	(734) 528-1212	Arabic, French, Italian, Portuguese, Spanish, Swahili, Turkish
PALS International	Troy	(248) 362-2060	Any language
Persia House of Michigan	West Bloomfield	(248) 302-1447	Farsi, Persian
Rainbow Visa and Passport Services	Dearborn	(313) 582-3322	Arabic, Chaldean, French
Richardson International	West Bloomfield	(248) 865-5099	Chinese, Japanese
SCT Translation Service	Detroit	(313) 841-4411 12 pm – 6:30 pm	Spanish
Servicios Diversos, LLC	Ann Arbor	(734) 973-9824	French, German, Italian, Portuguese, Russian, Spanish, Thai

AGENCY	CITY	TELEPHONE NUMBER	LANGUAGES
St. Clair County Community College	Port Huron	(810) 989-5578	French, German, Spanish
St. Clement of Rome Catholic Church	Romeo	(586) 752-9611	Spanish
Suzuki Myers & Associates	Novi	(248) 344-0909	Japanese
Translation Consultants	Brownstown	(734) 783-0633	Romanian
Translation International, Inc.	Warren	(586) 201-0502	Hungarian, Romanian
Trident Trade Group	Warren	(586) 759-6563	Russian, Ukrainian
Ukrainian Cultural Center	Warren	(586) 757-8130	Russian, Ukrainian
University Translators Services LLC	Ann Arbor	(734) 665-7295	Any language
Verbum Translations	Troy	(248) 224-8600	French, German, Japanese, Romanian, Spanish
Vital International Programs	Sterling Heights	(586) 795-2500 ext. 105	Any language
Voices Around the World	Royal Oak	(248) 288-6440	Albanian, Arabic, Bosnian (Serbo-Croatian), Chinese, French, German, Japanese, Macedonian, Polish, Portuguese, Russian, Spanish
Washtenaw Community College	Ann Arbor	(734) 973-3300	French, German, Spanish
Wayne County Community College	Detroit	(313) 943-4000	Arabic, Spanish
World of Immigration, Passport, Visas and Translation Services	Dearborn Heights	(313) 406-5747	Any language
World Wide Translating/Interpreting Service, Inc.	Sterling Heights	(313) 873-7905 (313) 345-2229 (586) 795-0904	Any language

ⁱ The executive order verbatim can be found online at <http://www.usdoj.gov/crt/cor/Pubs/eolep.htm>.

ⁱⁱ Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons. Federal Register: December 14, 2005 (Volume 70, Number 239)

ⁱⁱⁱ The DOT has also posted an abbreviated version of this guidance on their website at <http://www.dotcr.ost.dot.gov/asp/lep.asp>.

^{iv} <http://www.dotcr.ost.dot.gov/asp/lep.asp>

^v Department of Justice Final LEP Guidelines, Federal Register June 18, 2002-Vol. 67-Number 117.

**SUB-RECIPIENT APPLICATION FOR CERTIFICATION OF
TITLE VI AND EEO COMPLIANCE AND ASSURANCES**

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

If you need assistance completing this form or additional information, please contact us by phone at (517) 373-0980, Fax (517) 373-6457 or TDD/TTY through the Michigan Relay Center at (800) 649-3777.

COMPANY/ORGANIZATION NAME		TELEPHONE NUMBER	
STREET ADDRESS		FAX NUMBER	
P.O. BOX		CITY	
COUNTY	STATE	ZIP CODE	

Recipients of federal financial assistance must comply with the following procedures for monitoring and ensuring non-discrimination in any program, service, or activity, as required by 23 CFR Appendix A of part 230 Special Provisions.

1. Sub-recipient must establish an Equal Opportunity Policy. Sub-recipient must accept as their operating policy the following: It is the policy of this Company to assure that applicants are employed, and that employees are treated during employment without regard to their race, religion, gender, color, or national origin. Such action shall include: employment, upgrading, demotion, or transfer; recruitment or recruitment advertising; layoff or termination; rates of pay or other forms of compensation; and selection for training, including apprenticeship pre-apprenticeship, and/or on-the-job training.
2. Sub-recipient must designate and make known to MDOT an Equal Opportunity Officer. The individual appointed must be capable of effectively administering and promoting an active program of equal employment opportunity and must be assigned adequate authority and responsibility to do so.
3. The sub-recipient equal opportunity policy must be disseminated to all staff members authorized to hire, supervise, promote, and discharge employees, or who recommend such action. To ensure that the policy is known, periodic meetings of supervisory and personnel office employees must be conducted not less than once every six months.
4. All employees, prospective employees and potential sources of employees should be advised of the sub-recipients equal opportunity policy. Notices and posters setting forth the employer's equal opportunity policy must be placed in areas readily accessible to the aforementioned. The employer's/contractor's equal employment opportunity and the procedures to implement the policy must be brought to the attention of employees by means of meetings, employee handbooks, or other appropriate means.
5. When advertising for employees, the sub-recipients must include, in all advertisements for employees the notation: "An Equal Opportunity Employer." All such advertisements must be published in newspapers or other publications having a large circulation among minority groups in the area from which the project work force would normally be derived.
6. Sub-recipients must establish a process to investigate all complaints of alleged discrimination and take appropriate corrective action, including a method to inform all complainants of their avenues of appeal. Complainants should be advised of their right to file a complaint with governmental agencies (i.e., the State recipient, the Federal agency providing funds to the state recipient, the Department of Civil Rights, the Department of Justice, etc.).

A copy of 23 CFR Appendix A to Subpart A of Part 230 Special Provisions is available upon request. It provides specific information regarding equal employment opportunity responsibilities.

NAME AND TITLE OF THE EQUAL EMPLOYMENT OFFICER (this individual must be capable of effectively administering and promoting an active equal opportunity program and is assigned adequate authority and responsibility to carry out these duties.)

NAME (Please Print)	COMPANY/ORGANIZATION TITLE (Please Print)
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I certify that I will abide by the equal employment opportunity requirements outlined in this application. I also understand the provisions of Title VI and related statutes. This certification is also my assurance that I will not discriminate on the grounds of race, color, national origin, gender, age, or disability.

AUTHORIZED CORPORATE OR ORGANIZATIONAL OFFICER	TITLE	DATE
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NOTE: You must notify MDOT within 45 days if any of the information you provided on this application changes.

Please return this application to:

**Cheryl Hudson, EEO Officer
Michigan Department of Transportation
425 W. Ottawa Street
Lansing, Michigan 48933
(517) 373-0980
HudsonC1@michigan.gov**

Do not write in this area below

APPROVAL	DATE
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TITLE VI SUB-RECIPIENT ANNUAL CERTIFICATION FORM

This form is to certify compliance with Title VI of the Civil Rights Act of 1964. If your Title VI Plan has been approved by the Michigan Department of Transportation (MDOT), all changes to the organization's Title VI Plan which occurred during the current fiscal year (October 1 thru September 30) must be reported on this form. Please attach additional pages, as necessary, to provide a complete response to each question.

NAME OF ORGANIZATION _____

NAME OF TITLE VI COORDINATOR _____	TITLE _____
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ADDRESS _____

CITY _____	COUNTY _____	STATE _____	ZIP CODE _____
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TELEPHONE NO. _____	FAX NO. _____	E-MAIL ADDRESS _____
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- | | | | |
|----|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------|-----------------------------|
| 1. | Has your Title VI Coordinator/EEO Officer changed during the reporting period or since your last Title VI Plan was approved? If yes, please list the name and contact information for the new coordinator/EEO Officer. | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
|----|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------|-----------------------------|
- | | | | |
|----|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|------------------------------|
| 2. | Has your organization had any projects that have Title VI, LEP, or EJ impacts? How many? If yes, what did you do to ensure that those populations affected by the project had meaningful access to and involvement in the development process? | <input type="checkbox"/> No | <input type="checkbox"/> Yes |
|----|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|------------------------------|
- | | |
|----|---------------------------------------------------------------------------------------------|
| 3. | What is the number or percentage of LEP or EJ populations who were affected by the project? |
|----|---------------------------------------------------------------------------------------------|
- | | |
|----|--------------------------------------------------------------------------------|
| 4. | How many public involvement meetings did you hold during the reporting period? |
|----|--------------------------------------------------------------------------------|
- | | | | |
|----|--------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|------------------------------|
| 5. | Did you provide language assistance at any of your public meetings during the reporting period? How many persons received this assistance? | <input type="checkbox"/> No | <input type="checkbox"/> Yes |
|----|--------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|------------------------------|
- | | | | |
|----|--------------------------------------------------------------------------------------------------------------|-----------------------------|------------------------------|
| 6. | Did you provide reasonable accommodation to persons with disabilities during the reporting period? How many? | <input type="checkbox"/> No | <input type="checkbox"/> Yes |
|----|--------------------------------------------------------------------------------------------------------------|-----------------------------|------------------------------|
- | | | | |
|----|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|------------------------------|
| 7. | Did you receive any formal or informal Title VI complaints, or law suits during this reporting period? If yes, how many, and please provide details regarding each complaint or law suit and the resolution. | <input type="checkbox"/> No | <input type="checkbox"/> Yes |
|----|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|------------------------------|
- | | |
|----|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 8. | How many contracts did you enter into with Disadvantaged Business Enterprises during the reporting period? If none, what did you do to encourage participation by DBEs? |
|----|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
- | | |
|----|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 9. | During this reporting period, how many of your employees have been educated about Title VI and their responsibility to ensure non-discrimination in any of your programs, services, or activities. |
|----|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
- | | |
|-----|----------------------------------------------------------------------------------------------------|
| 10. | Please provide any comments or additional information related to the organization's Title VI Plan. |
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The information reported on this form is accurate and reflects all changes to the organization's Title VI Plan for the current fiscal year.

NAME _____	TITLE _____	DATE _____
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If you have questions regarding Title VI, contact: Cheryl Hudson, EEO Officer (517) 373-0980, or HudsonC1@michigan.gov **MAIL COMPLETED FORM TO:** Cheryl Hudson, EEO Officer, Michigan Department of Transportation, 425 W. Ottawa Street, Lansing, Michigan 48933

PLEASE SUBMIT THIS FORM BY OCTOBER 5TH OF THE REPORTING YEAR