



2021 Title VI Plan

A Doorway to Non-Discrimination

What is Title VI?

Title VI of the Civil Rights Act of 1964 prohibits the discrimination in, or the denial of benefits under, any program or activity receiving federal financial assistance on grounds of race, color, and national origin.

Additional federal requirements assure that no person shall, on the grounds of English proficiency, sex, age, disability, and income, be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any City program or activity.

In 2015, the City of Beaverton passed Resolution 4353, reaffirming these values and adding protections for religion, sexual orientation and gender identity.



History of Title VI at COB

- As a recipient of federal funds, the City of Beaverton is required to develop a Title VI implementation plan.
- In 2015, the Oregon Department of Transportation performed an audit of Beaverton's Title VI program.
 - ✓ Implemented compliance measures after audit.
- Partnership with PSU's Center for Public Service launched the project in March of 2021.

All policy recommendations subject to Council approval.

Current Draft of COB Title VI Plan

- Documents good work the City is already doing.
 - Review of key documents – DEI, Climate Action, Language Access Policy, etc.
 - Interviews with key staff members.
- Minimizes policy changes while ensuring compliance with Federal requirements and adoption of best practices.

During implementation, business practices will be continually reviewed, assessed, and updated.

Section 4: Organization & Staffing

- Formalizes role of HR Director's role as the Title VI Coordinator*

*Must have direct access to City Manager.

- Creates Title VI Liaisons for each department.
- Recommends roles for Title VI support system throughout COB.

Section 4: Organization & Staffing

- City Manager
- Title VI Coordinator
- Title VI Liaisons
- Office of the City Attorney
- City Department Heads
- Cultural Inclusion Program
- Human Rights Advisory Commission
 - provide recommendations to the Title VI Coordinator in the review and revision of the Plan;
 - review the Annual Title VI Report prior to submission.

Section 5: Dissemination & Retention of Info

- Describes policy for publishing, retaining and updating Title VI information and policies.
 - Ensures accessible dissemination of Title VI information in various formats, locations, modalities and languages.

Section 6: Data Collection and Program Review

- Collection of demographic data: Race, color, national origin, language spoken, income level, persons with disabilities, and sex.
- Use of data to perform annual program reviews.
- Use of annual program reviews in the Annual Title VI Accomplishments Report.

Section 7: Title VI Training

- Annual Title VI training required for every employee.
 - ✓ Training to be commensurate with roles and responsibilities.
 - ✓ Implemented during the 2021-2022 fiscal year.

Section 8: Compliance & Enforcement

- Describes the procedure for reporting and mitigating noncompliance.
 - ✓ Includes procedures for both internal noncompliance and external (e.g. contractor, subcontractor) noncompliance.

Section 9: Environmental Justice

Describes steps and questions for avoidance, minimization, or mitigation of effects if a proposed project, policy, or activity is "*found to potentially create disproportionately high and adverse human health or environmental effects*" on "*minority or low-income populations*".

*Cross-functional communication within City departments is ongoing.

Section 10: Language Access

- Ensures meaningful access to services and programs for persons who are learning the English language.
- ✓ The City's currently applicable Language Access Policy was last approved in 2019.

Appendix A: Complaint Process

- Refines current process.
- Clarifies language and expands on appeals process.
- ✓ Implemented upon publication to website.

Appendix B: Complaint Form

- Revises current form to improve accessibility.
- ✓ Implemented upon publication to website.

Appendix C: Standard Assurances

Include the following paragraph in **all** contracts and subcontracts:

"The sub-grantee, contractor, subcontractor, successor, transferee, and assignee shall comply with Title VI of the Civil Rights Act of 1964, which prohibits recipients of Federal financial assistance from excluding from a program or activity, denying benefits of, or otherwise discriminating against a person on the basis of race, color, or national origin (42 U.S.C. § 2000d et seq.), which are herein incorporated by reference and made a part of this contract (or agreement). Title VI also includes protection to persons with "Limited English Proficiency" in any program or activity receiving Federal financial assistance, 42 U.S.C. § 2000d et seq., and herein incorporated by reference and made a part of this contract or agreement."

Implementation Timeline

- Implemented immediately upon Council approval of the Plan
 - ✓ Title VI Coordinator role & responsibilities;
 - ✓ Title VI support team roles & responsibilities;
 - ✓ Compliance and enforcement procedures;
 - ✓ Standard Title VI Assurances in every new contract;
 - ✓ HRAC oversight.
- Implemented upon publication to website
 - ✓ Complaint process & form.
- Implemented during the 2021-2022 fiscal year
 - ✓ Title VI Liaisons roles & responsibilities;
 - ✓ Demographic data collection;
 - ✓ Annual Title VI training;
 - ✓ Environmental Justice mitigation strategy.
- Implemented during the 2022-2023 fiscal year
 - ✓ Annual review process;
 - ✓ Annual accomplishments report.

Proposed Next Steps

- Continued review and minor edits.
- Internal engagement.
- Council review and discussion.
 - ✓ September 14: Action item.
- Public comment period.
- Post-approval implementation steps.
 - ✓ Graphic design & IT consultation.
 - ✓ Translation of key documents.
 - ✓ Update of Title VI webpage.

Proposed Public Engagement Plan

- Designate a webpage to serve as an information portal for the Title VI implementation process.
- Provide hard copies of the Plan during a designated period at key City buildings.

Acknowledgments

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Community partners: Diversity Advisory Board & Human Rights Advisory Commission

Cross-referenced cities: Gresham, OR; Salem, OR; Farmington Hills, MI; Lawrence, KS MPO; Bend, OR MPO