

City of Irvine

Title VI Plan



Adopted:

December 2024

This document is available in other languages upon request.

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City of Irvine

Title VI Non-Discrimination Notice to the Public

The City of Irvine, in compliance with Title VI of the Civil Rights Act of 1964 and related regulations, ensures that no person in the City of Irvine, 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 it administers that is receiving federal financial assistance. The City of Irvine further assures every effort will be made to ensure non-discrimination in all its programs, activities, and services, whether those programs, activities and services are federally funded or not.

Additionally, Since 1972 the Federal Transit Administration (FTA) has required recipients of Federal assistance to certify compliance with the requirements of Title VI as part of the funding eligibility process. Executive Order (EO) 13166, Improving Access to Services for Persons with Limited English Proficiency (August 2000), is directed at implementing the protections afforded by Title VI of the Civil Rights Act of 1964 and related regulations. Accordingly, it prohibits recipients of Federal financial assistance from discriminating based on national origin by failing to provide meaningful access to services to individuals who are of Limited English Proficiency (LEP). This protection requires that LEP individuals be provided an equal opportunity to benefit from or have access to services that are normally provided in English.

If you believe you have been excluded from participation in, been denied the benefits of, or been subjected to discrimination under this City of Irvine program, you may file an official Title VI complaint with the City. We encourage you to make your complaint in writing. A complaint must be filed within 180 days after the date of the alleged discrimination. The Title VI Complaint Procedures and Complaint Form can be obtained on the City's web page or by contacting Employee Relations Liaison in Human Resources.



Public Participation Equal Opportunity Non-Discrimination Policy



The City of Irvine's Title VI Plan follows a Federal statute which provides that no person shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination in any activity or program. This plan is organized to work in concert with the Public Participation Plan, the Federal Transit Administration (FTA) and the City of Irvine Language Access Plan for LEP individuals. The purpose of this plan is to establish procedures that allow for, encourage, and monitor participation of all citizens living and working in the City, and users of public transportation.

The City of Irvine is committed to a policy of non-discrimination in employment practices and reaffirms its commitment that no person shall benefit or be discriminated against on the basis of race, color, or national origin, or any other basis that is inconsistent with Federal or State statutes, the City of Irvine ordinances, resolutions, rules, or regulations.

A. INTRODUCTION

The City of Irvine is a sub-recipient of financial assistance from federal aid programs. Sub-recipients of this financial assistance are required to comply with various nondiscrimination laws and regulations, including Title VI of the Civil Rights Act of 1964 as amended (42 U.S.C. section 2000d). Title VI of the Civil Rights Acts of 1964 forbids discrimination against anyone in the United States because of race, color or national origin by any agency receiving federal funds. Title 49 of the U.S.C. section 47123, "Nondiscrimination" further prohibits recipients of FAA financial assistance from engaging in discrimination based on sex and religion. The Federal-Aid Highway Act of 1973 also added the requirement that there be no discrimination on the grounds of sex. Additionally, the Age Discrimination Act of 1975, as amended (42 U.S.C. Section 6101 et seq.) prohibits discrimination against FAA program beneficiaries on the grounds of race. The Civil Rights Restoration Act of 1987 defines the word "program" to make clear that **discrimination is prohibited throughout an entire agency if any part of the agency receives federal financial assistance.**

This document was prepared by the City of Irvine (COI) Human Resources in compliance with Title VI of the Civil Rights Act of 1964, including new provisions detailed in U.S. Department of Transportation's FTA Circular 4702.1B, "Title VI Requirement and Guidelines for Federal Transit Administration Recipients." The City of Irvine commits to ensure that none of its activities or programs treats any part of the community any differently than another. The City expects every manager, supervisor, employee, and vendor and contractor sub-recipient of federal aid funds administered by the City to be aware of and apply the intent of Title VI of the Civil Rights Act of 1964 in performing assigned duties.

Public Participation Equal Opportunity Non-Discrimination Policy



The Federal Aviation Administration (FAA), Federal Highway Administration (FHWA) and Federal Transportation Administration (FTA) requires recipients of Federal financial assistance in FAA programs, Federal-aid highway funds and Federal-aid public transportation funds to prepare and implement a program to clarify roles, responsibilities and procedures established to ensure compliance with Title VI of the Civil Rights Act of 1964. The City's Title VI Program focuses on fair and equitable access by the public and provides the policy direction necessary to ensure compliance with Title VI of the Civil Rights Act of 1964.

B. TITLE VI OF THE CIVIL RIGHTS ACT OF 1964 AND RELATED AUTHORITIES

Title VI of the 1964 Civil Rights Act provides that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied benefits or, or be subjected to discrimination under any program or activity receiving Federal financial assistance (implementation through 23 CFR 200.9 and 49 CFR 21).

Section 162(a) of the Federal-Aid Highway Act of 1973 (Section 324, Title 23 U.S.C.) added the requirement that there be no discrimination on the grounds of sex.

Section 504 of the Rehabilitation Act of 1973 provides nondiscrimination under Federal grants and programs.

The Civil Rights Restoration Act of 1987 broadened the scope of Title VI coverage by expanding to the recipients, subrecipients and contractors, whether such programs are Federally funded or not (PL100259).

Environmental Justice Executive Order 12898 (issued February 11, 1994) addresses disproportionate adverse environmental, social, and economic impacts that may occur in minority and low-income populations. Agencies must develop strategies to address disproportionately high and adverse human health or environmental effects of their programs on minority and low-income populations; promote nondiscrimination in federal programs substantially affecting human health and the environment; and provide minority and low-income communities access to public information and an opportunity for public participation in matters relating to human health or the environment.

Limited English Proficiency Executive Order 13166 (issued August 16, 2000) improves access to services for persons with limited English proficiency. Agencies are directed to evaluate services provided and implement a system that ensures that Limited English Proficiency (LEP) persons are able to meaningfully access the services provided, consistent with, and without unduly burdening the fundamental mission of the local agency. Agencies are directed to ensure that recipients of federal financial assistance provide meaningful access to programs, services and information to their LEP applicants and beneficiaries free of charge.

Public Participation Equal Opportunity Non-Discrimination Policy



Additional information on the City of Irvine's plan associated with Limited English Proficiency may be viewed in Attachment B. This training document is reviewed by all new employees at time of appointment.

Title 49 Subtitle A Part 21 (issued June 18, 1970) effectuates the provisions of title VI of the Civil Rights Act of 1964 to the end 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 receiving Federal financial assistance from the Department of Transportation.

C. ORGANIZATION, STAFFING, AND RESPONSIBILITIES

Title VI Coordinators

The City Employee Relations Liaison is responsible for the overall Title VI program implementation in partnership with the City Accessibility Coordinator who oversees interactive processes as they pertain to disability and accessibility. These analysts in Human Resources perform the lead and participatory role in the development and implementation of Title VI program compliance with responsibilities including:

- Identification of the most appropriate methods for reaching the public;
- Determining communication and reporting barriers;
- Promptly processing and resolving Title VI complaints;
- The identification and elimination of discrimination when found to exist;
- Promptly resolving areas of deficiency;
- Ensuring that Title VI requirements are included in policy directives and that the procedures used have built-in safeguards to prevent discrimination;
- Assisting City staff and leadership to correct Title VI problems or discriminatory practices or policies when conducting self-monitoring and review activities;
- Developing Title VI information for public dissemination, where appropriate, in languages other than English.
- Working with stakeholders who are either directly, or indirectly, affected by a plan, or the recommendations of that plan.

Title VI Departmental Liaisons

All Title VI departmental liaisons will work with the City Title VI Coordinator to accomplish Title VI goals and responsibilities, including the implementation and monitoring of the Title VI requirements for Federally funded projects in which their department is involved.

The following Liaison responsibilities apply to Liaison staff in every department with regard to Federal funded projects in the department:

- Detail efforts taken to identify minority or low-income populations affected by Federally funded project activities including rights-of-way, roads, bridges, airport facilities, etc.

Public Participation Equal Opportunity Non-Discrimination Policy



- Conduct meetings to provide information to local populations concerning proposed projects.
- Attend public meetings to document and verify the level of participation of Title VI protected group members.
- Ensure LEP individuals affected by contract awards or construction projects receive meaningful access to the process that allows them to participate.
- Ensure that proper Title VI training is received by staff, consultants and vendors.

D. FEDERAL AID TITLE VI IMPLEMENTATION

1. Public Participation/Outreach Activities

a. The City will develop and publish a Public Notice that our programs, at minimum, operate within the requirements and spirit of Title VI and indicate that federal law prohibits discrimination as seen in Attachment A. These notices are placed in public-facing areas of all City buildings within the community and on our website.

b. The City will disseminate Title VI information and related statutes to the general public and, where appropriate, in languages other than English stating that the City administers programs subject to the non-discrimination requirements of Title VI, summarizing those requirements, noting the availability of Title VI information from the City and state and federal agencies, stating persons' rights under the laws, and briefly explaining the procedures for filing complaints. The City will develop and publish this Title VI plan on the City website to provide the public with this Title VI information. In accordance with our Language Access Policy (LAP), the brochure will be translated into Spanish, Farsi, Mandarin, Cantonese, Japanese, Korean, Vietnamese, and Arabic. This brochure will be offered for distribution to the general public and other parties or individuals participating in or otherwise benefitting from federal aid programs. The brochures may be available in mediums other than the written word upon request, and the brochure will be periodically reviewed, and revisions will be made as appropriate. Where feasible, the brochure and other materials relevant to this Title VI program will be prominently displayed.

The City will also include information on Title VI requirements, complaint procedures and the rights of beneficiaries in handbooks, manuals, pamphlets, and other material which are ordinarily distributed to the public to describe the federal aid programs and the requirements for participation by recipients and beneficiaries.

Public Participation Equal Opportunity Non-Discrimination Policy



c. Where a significant number or proportion of the population eligible to be served or likely to be directed affected by a federal aid program needs service or information in a language other than English in order to be effectively informed or to participate in the program, the City shall take reasonable steps to provide information in appropriate languages to such persons.

d. A Citywide Civil Rights Title VI Program web page will be developed containing this Title VI Program information and will be accessible to all City employees and the public.

e. Site and facility location – The City shall not make a selection of a site or location of a facility for participants in and beneficiaries of the City’s federal aid programs if that selection could exclude individuals from participation in, to deny them the benefits of, or to subject them to discrimination on the grounds of race, color and national origin or could substantially impair the accomplishment of the objectives of non-discrimination on the aforesaid grounds.

f. Upon request from persons served by or participating in federal aid programs administered by the City, the City will provide sign language interpreters and make information available to the public in alternate formats, such as Braille or large text. The following language (or a version of) will be incorporated into all public participation/outreach materials:

Individuals requiring reasonable accessibility accommodations may request written materials in alternate formats, physical accessibility accommodations, sign language interpreters, language interpreters, or other reasonable accommodations by contacting our City Title VI Coordinator and ADA Compliance Officers at (949) 724-6067. Requests should be made a minimum of three (3) business days in advance. Some services may require more time to process.

2. Department Programmatic Activities

a. Limited English Proficiency Assistance Plan: In accordance with Executive Order 13166 (“Improving Access to Services for Persons with Limited English Proficiency”), the City has developed a Limited English Proficiency (LEP) Assistance Plan to ensure that those who may or may not be able to communicate in English who are served by federal aid programs administered by the City are provided, free of charge, meaningful access to programs, services. Specifically, the LEP plan addresses language barriers and resources to ensure LEP persons are not prevented from obtaining services and information relating to services, programs and projects and understanding the benefits to which they are entitled.

Public Participation Equal Opportunity Non-Discrimination Policy



For federal aid programs administered by the City, the City will conduct an LEP Needs Assessment using the four-factor analysis recommended by United States Department of Transportation to identify reasonable steps to ensure meaningful access to its programs and activities by Limited English Proficiency (LEP) persons in accordance with the guidance described in Attachment B.

b. Environmental Justice in Minority and Low-Income Populations: In accordance with Executive Order 12898 (“Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations”) the City will develop strategies to address disproportionately high and adverse human health or environmental effects on minority and low-income populations, to promote nondiscrimination in Federal-aid programs substantially affecting human health and the environment, and to provide minority and low-income communities access to public information and an opportunity for public participation in matters relating to human health or the environment.

c. Site and Facility Location: The City shall not make a selection of a site or location of a facility for participants in and beneficiaries of the City’s federal aid programs if that selection could exclude individuals from participation in, to deny them the benefits of, or subject them to discrimination on the grounds of race, color and national origin or could substantially impair the accomplishment of the objectives of nondiscrimination on the aforesaid grounds.

d. Data Collection: The City will gather, analyze and maintain statistical data on race, color and national origin of participants in and beneficiaries of the City’s federal-aid programs to determine the investment benefits and burdens to the eligible population, including minority and low-income populations. Data gathering procedures will be reviewed regularly to ensure sufficiency of the data administration. The City will regularly analyze and evaluate the data collected and data-collecting procedures to determine the effectiveness of outreach methods in meeting requirements of the Title VI Program to ensure to group is excluded during the decision-making process or is not given an opportunity to voice their opinions or concerns.

e. Complaint Process: The City will ensure that no employee or agent of the City shall intimidate, retaliate, threaten, coerce, or discriminate against any individual for the purpose of interfering with any right or privilege to file a complaint, or because an individual has made or participated in a complaint. If any individual believes that they or any other federal aid program beneficiaries have been subjected to unequal treatment or discrimination on the grounds of race, color or national origin, they may exercise their right to file a complaint with the City. More detailed information on the complaint process can be viewed in Attachment C.

Public Participation Equal Opportunity Non-Discrimination Policy

The City of Irvine's complaint form provides the complainant several opportunities to report instances of discrimination. The form is available to the public by utilizing this link: [COI Title II and VI Non-Discrimination Form](#) to complete and submit their complaint. Alternative methods for submitting a complaint are listed directly on the form, including: mailing address to mail the completed form, an email address to submit the form electronically, and a phone number to report complaints via phone. An example of this form and detailed process can be viewed in Attachment C.

f. Training: The City will provide trainings on Title VI and its related statutes, including the Executive Order on Limited English Proficiency, for managers, supervisors, staff with frequent public interaction, and applicable vendors.

g. Title VI Contract Provisions: Federal aid construction contracts must include provisions, which require compliance with Title VI. The specific contract provision language to be included can be found in the Federal Highway Administration (FHWA) Form 1273.

h. Consultant Procurement: City contracts should contain language regarding compliance and Civil Rights laws. Contractor hereby assures that it will comply with Subchapter VI of the Civil Rights Act of 1964, 42 USC Sections 2000 (e)(17), to the end that no person shall, on the grounds of race, color, and national origin, be excluded from participation in, be denied the benefits or, or be otherwise subjected to discrimination under this Contract or under any project, program or activity supported by this Contract. Contractor shall comply with its EEO Certification (Form PW-7).

2. Program Assessment

The City will perform a periodic assessment of the Public Participation Plan, as outlined in Attachment D, to determine the City's effectiveness in ensuring that no person, shall on the grounds of race, color, and national origin be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any federal aid programs or activities it administers. Any Title VI compliance issues identified will be addressed by immediate action or by revision of or addition to the Public Participation Plan.

3. Annual Report

Per FHWA requirements, The City will develop an annual report of Title VI accomplishments and upcoming goals including an update to the Title VI Program that reflects organizational, policy and implementation changes, as well as activities and goals for the coming year.

Public Participation Plan



INTRODUCTION

The City of Irvine's Public Participation Plan is organized to work in conjunction with the Title VI Plan and the Language English Proficiency Plan. The purpose of the Citizen Participation Plan is to provide a structured and inclusive approach for engaging Irvine residents, businesses, and stakeholders in City decision-making processes, ensuring transparency, equity, and collaboration. Special attention will be paid to soliciting input from communities that are traditionally underrepresented. The City's Access Irvine App is a tool readily available to make a request, complaints, or comments and serves as effective channels of communication for the City to engage the citizenry.

A variety of outreach techniques will be used to solicit input in cooperation with the Citizen Participation Plan. Materials will be developed with the understanding that there are individuals with Limited English Proficiency, and will be translated in other languages upon request.

OBJECTIVES

The City's Citizen Participation Plan has a single comprehensive goal: to set forth the City of Irvine's policies and procedures for providing citizens and other interested parties with opportunities to participate in an advisory role in the planning, implementation, and evaluation of funding the City has received. This plan also allows the public a variety of opportunities throughout the planning process to influence and understand decisions.

OUTREACH TECHNIQUES

The City will continue to adapt communication and outreach based on the needs of the community and will utilize a variety of communication methods, including social media, public meetings, email newsletters, online surveys, multilingual materials, and local radio or newspaper announcements, to ensure broad and inclusive public participation.

Outreach Techniques

Purpose

Engaging minority and Limited English Proficiency populations can be challenging. Below is a list of the minimum outreach techniques and efforts that the City uses to actively solicit public input in the planning process of a project or to notify the community of access and opportunities to participate in programs, services, and other City led projects.

Media



Questions?

Contact Human Resources



949-724-6067



hr@cityofirvine.org



www.cityofirvine.org

The City of Irvine, under Title VI of the Civil Rights Act of 1964 and related statutes, ensures that no person in the City of Long Beach, on the grounds of race, color or national origin shall be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity it administers. The City of Long Beach further assures every effort will be made to ensure non-discrimination in all of its programs, activities and services, whether those programs, activities and services are federally funded or not.

Complaints that do not fall under the City of Irvine's jurisdiction will be referred, wherever possible, to the California Department of Transportation, the Federal Highway Administration, the Federal Transit Authority, the U.Ss Department of Transportation, or the U.Ss Department of Justice and the complainant will be advised.



City of Irvine Notice to the Public

Title VI of the Civil Rights Act

Non Discrimination in Federal Financial Assistance

Title VI of the 1964 Civil Rights Act provides that no person in the United States shall, on the grounds of race, color, or national origin be excluded from participation in, be denied benefits of, or be otherwise subjected to discrimination under any program or activity receiving federal financial assistance. The City of Irvine is committed to be in full compliance with Title VI of the Civil Rights Act of 1964, and related statutes and regulations, for all City programs and activities.

In addition to Title VI, the other nondiscrimination statutes that afford legal protection are: Section 162 (a) of the Federal-Aid Highway Act of 1973 (23 USC 324) (sex); Age Discrimination Act of 1975 (age); and Section 504 of the Rehabilitation Act of 1973/Americans with Disabilities Act of 1990 (disability). Together, these requirements define an over-arching Title VI Program.

The City of Irvine will investigate any allegations of improper activity and discrimination based on race, color, sex, national origin. If you are considering filing a complaint and have questions, or would like additional information, please contact us directly at 949-724-6067. Complaint forms and instructions for filing complaints concerning discrimination are available on our website referenced below, and can be emailed or mailed directly to:

City of Irvine

Attn: Title VI Coordinator and ADA Compliance Officers

PO Box 19575, Irvine, CA 92623

ADACompliance@cityofirvine.org

Notice of Non Discrimination

The City of Irvine does not discriminate on the basis of race, color, national origin, sex, disability, sexual orientation, religion, or age in admission to, access to, or operations of its programs, services, or activities. This notice is provided as required by Title VI of the Civil Rights Act of 1964 and California Law. Questions, concerns, or complaints regarding possible discrimination and requests for additional information regarding the Civil Rights Act of 1964 and related laws should be forwarded to City's designated Title VI Coordinator/ADA Compliance Officer.

Limited English Proficiency Assistance

The City of Irvine, under Title VI of the Civil Rights Act of 1964, ensures that no person shall, on the basis of race, color or national origin, be excluded from participation in, be denied benefits of, or be otherwise subjected to discrimination under any program or activity it administers.

Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency (LEP) and resulting agency guidance, national origin discrimination includes discrimination on the basis of limited English proficiency.

LEP individuals are those who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English.

It is an expectation of all City of Irvine employees to provide timely, reasonable, effective, and meaningful access for LEP persons to all its programs and activities.

The City of Irvine encourages any complainants to file the complaint with the City of Irvine for immediate investigation and resolution.

Communicating with LEP Individuals

The following are considerations on how to assist a LEP individual:

1. Attempt to communicate in English first to determine if the customer can understand English sufficiently to be fully understood.
2. If a resident or visitor to the City of Irvine cannot understand or effectively communicate in English, determine the language they are speaking. If you recognize the language the customer is speaking but do not speak their language, skip to Step 4.
3. If the individual is in-person and you cannot recognize the language the customer is speaking, show them the "I Speak... Language Identification Guide" (page 2) listing so the customer can point to their language.
4. Consult the Bilingual Services list on the intranet to see if any Irvine employees speak, read, or write the requesting language. If so, contact them for interpretation assistance to aid the requestor with their question, comments, or concerns.
5. If a City employee cannot help with translation services, contact Bureaucom, the City's contracted translation and interpretation provider, for over the phone interpreting. They can be reached at 949-787-0598. Give the following information when prompted: Client name: City of Irvine; Client ID: 20410. View the Bureaucom Guide for more translation information on translation assistance.

Resources

- City approved translators – A list is available on the Intranet of City employees and the respective languages they speak. If the Intranet cannot be accessed, employees can call Human Resources or Public Safety Dispatch for assistance.
- I Speak Listing – A list of 69 language examples that you can show to constituents to identify the language they speak.
- City of Irvine Title VI Plan, translation available upon request.

Complaints

The LEP complaint process procedures mirror the complaint procedures as referenced in the Title VI Program Plan – Section E, Procedures for Filing a Title VI Complaint. Complaints may be submitted via the City of Irvine Title II and VI Non-Discrimination Grievance Form and additional information can be found on the City of Irvine website at cityofirvine.org or by calling Human Resources at 949-724-6067.




A
Amharic አኔ አማርኛ ነው ምናረው. Arabic أنا أتحدث اللغة العربية Armenian Ես խոսում եմ հայերեն
B
Bengali আমি বাংলা কথা বলতে পারি Bosnian Ja govorim bosanski Bulgarian Аз говоря български Burmese ကျွန်ုပ်တို့ မြန်မာလို ခြေငှက်တော် ဝါတယ်
C
Cambodian ខ្ញុំនិយាយភាសាខ្មែរ Cantonese 我講廣東話 (Traditional) 我讲广东话 (Simplified) Catalan Parlo català Croatian Govorim hrvatski Czech Mluvim česky
D
Danish Jeg taler dansk Dari من دری حرف می زنم Dutch Ik spreek het Nederlands
E
Estonian Ma raagin eesti keelt
F
Finnish Puhun suomea French Je parle français
G
German Ich spreche Deutsch Greek Μιλώ ελληνικά Gujarati હું ગુજરાતી બોલું છું
H
Haitian Creole M pale kreyòl ayisyen Hebrew אני מדבר עברית Hindi मैं हिंदी बोलता हूँ । Hmong Kuv has lug Moob Hungarian Beszélék magyarul

I Speak...

Language Identification Identification Guide

I
Icelandic Ég tala íslensku Ilocano Agsaonak ti Ilokano Indonesian saya bisa berbahasa Indonesia Italian Parlo italiano
J
Japanese 私は日本語を話す K Kackchiquel Quin chagüic K á chábal' ruin í Korean 한국어 합니다 Kurdish man Kurdîi zaanim Kurmanci man Kurmaanjîi zaanim
L
Laotian ຂ້ອຍປາກົດພາສາລາວ Latvian Es runāju latviski Lithuanian Aš kalbu lietuviškai

M
Mam Bán chiyola tuj kiyol mam Mandarin 我講國語 (Traditional) 我讲国语/普通话 (Simplified) Mon အဲဒီအတွက်ဆု
N
Norwegian Jeg snakker norsk
P
Persian من فارسی صحبت می کنم. Polish Mówię po polsku Portuguese Eu falo português do Brasil (for Brazil) Eu falo português de Portugal (for Portugal) Punjabi ਮੈਂ ਪੰਜਾਬੀ ਬੋਲਦਾ/ਬੋਲਦੀ ਹਾਂ।

Q
Qanjbal Ayin tí chí wal q' anjob' al Quiche In kinch' aw k' uin ch' e quiche
R
Romanian Vorbesc românește Russian Я говорю по-русски
S
Serbian Ja govorim српски Sign Language  I, ME SIGN, SIGN LANGUAGE Slovak Hovorím po slovensky Slovenian Govorim slovensko Somali Waxaan ku hadlaa af-Soomaali Spanish Yo hablo español Swahili Ninaongea Kiswahili Swedish Jag talar svenska
T
Tagalog Marunong akong mag-Tagalog Tamil நான் தமிழ் பேசுவேன் Thai พูดภาษาไทย Turkish Türkçe konuşurum
U
Ukrainian Я розмовляю українською мовою Urdu میں اردو بولتا ہوں
V
Vietnamese Tôi nói tiếng Việt
W
Welsh Dwi'n siarad
X
Xhosa Ndithetha isiXhosa
Y
Yiddish איך רעד יידיש Yoruba Mo nso Yooba
Z
Zulu Ngiyasikhuluma isiZulu

Executive Order 13166 requires DHS to take reasonable steps to provide meaningful access to its programs and activities for persons with limited English proficiency and - as also required by Title VI of the Civil Rights Act of 1964 - to ensure that recipients of federal financial assistance do the same.

I Speak is provided by the Department of Homeland Security Office for Civil Rights and Civil Liberties (CRCL). Other resources at www.lep.gov

Contact the DHS Office for Civil Rights and Civil Liberties' CRCL Institute at CRCLTraining@dhs.gov for digital copies of this poster or a "I Speak" booklet.

Download copies of the DHS LEP plan and guidance to recipients of financial assistance at www.dhs.gov/crcl



City of Irvine Limited English Proficiency Analysis

As a recipient of federal grant funds, the City of Irvine (“City” or “Irvine”) is required to make reasonable efforts to provide language assistance to ensure meaningful access for Limited English Proficiency (LEP) persons to the City’s programs and activities. Meaningful access is defined as language assistance that results in accurate, timely, and effective communication and is available at no cost to the LEP individual. Executive Order 13166, “Improving Access to Services for Persons with Limited English Proficiency” (LEP), Title VI of the Civil Right Act of 1964, provides the basis for these requirements.

To ensure the appropriate targeting of resources, the City conducted an analysis in accordance with U.S. Department of Justice LEP Guidance, which evaluated: 1) the number or proportion of LEP persons in the population to be served, 2) the frequency with which LEP persons come into contact with the program activity or service, 3) the importance of the service, information, program, and/or activity, and 4) the resources, financial and human, available to the City.

After determining the applicable language groups that may require LEP assistance, a Language Access Plan was then developed, focused on the provision of translation and interpretation services to LEP individuals who speak the following languages:

- | | |
|-------------------------------------|---------------|
| 1. Spanish | 4. Japanese |
| 2. Persian (Farsi) | 5. Korean |
| 3. Chinese (Mandarin and Cantonese) | 6. Vietnamese |
| | 7. Arabic |

The City commits to continuing language assistance efforts already being conducted, including but not limited to the following:

1. Provide free oral interpretation services at the various facilities where the City provides federally-funded activities and services;
2. Perform written translations for all documents deemed vital for each program/activity;
3. Conduct targeted outreach to LEP populations via community contacts and ethnic and foreign media; and
4. Train staff on the requirements of the plan and its effective implementation at the staff, program, and project level.

The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or grantee.

According to the U.S. Census Bureau's 2018-2022 American Community Survey (ACS) 5-Year Estimates, Irvine has a population of approximately 284,209. Around half of Irvine's residents speak a language other than English at home. Of critical concern for the development of this Plan is the language spoken at home by individuals who speak English less than "very well", which is demonstrated in the table below:

Language Spoken at Home, City of Irvine		
Population 5 years of age and over	Number	Percent
	284,209	100%
English only	140,908	49.6%
Language other than English	143,301	50.4%
Speaks English less than "very well"	45,787	16.1%
Spanish	18,296	6.4%
Speaks English less than "very well"	2,554	0.9%
Other Indo-European languages	25,018	8.8%
Speaks English less than "very well"	6,924	2.4%
Asian and Pacific Islander languages	84,940	29.9%
Speaks English less than "very well"	34,466	12.1%
Other languages	8,123	2.9%
Speaks English less than "very well"	1,843	0.6%

Source: U.S. Census Bureau, 2018-2022 American Community Survey 5-Year Estimates (Table S1601)

Analysis

The relevant data in the "Language Spoken at Home" table, above, are summarized in the following table:

Safe Harbor Guidance: Size of Language Group and Recommended Provision of Language Assistance	
1,000+ of the eligible population in the service area, or among current beneficiaries	Translate vital documents
> 5% of the eligible population or beneficiaries, and 50+ in number	Translate vital documents
> 5% of the eligible population or beneficiaries, <i>and</i> 50 or less in number	Translate written notice of right to receive free oral interpretation of documents
5% or less of the eligible population or beneficiaries, <i>and</i> less than 1,000 in number	No written translation is required

Speak English less than “very well”		
Language Spoken at Home	Population 5 years and over	% of Eligible Population
Spanish	2,554	0.9%
Other Indo-European languages	6,924	2.4%
Asian and Pacific Islander languages	34,466	12.1%
Other Languages	1,843	0.6%

Source: Extracted from the “Language Spoken at Home” data

For the purposes of this review, the “eligible population” is defined as the City’s population over the age of five years, which is 284,209 persons according to the 2018-2022 ACS estimates. This standard is applied to facilitate review and interpretation of the available U.S. Census and ACS data, and to provide the most conservative assessment of LEP needs.

The “Language Spoken at Home” table provides data for the four (4) major language classifications employed by the ACS. All four (4) of the major language classifications contain an eligible population exceeding the 1,000 person safe harbor threshold (the population speaking Asian and Pacific Islander languages also exceeds the 5 percent safe harbor threshold).

Spanish

The 2,554 Spanish speaking persons indicating they speak English less than “very well”, constitutes 0.9 percent of the eligible population of 284,209 persons. This exceeds the 1,000-person threshold established under HUD’s safe harbor guidance. Based on this determination, the translation of vital documents into Spanish is required.

Other Indo-European languages, Asian and Pacific Islander languages, and Other Languages

Further review is required to determine the specific Other Indo-European languages, Asian and Pacific Islander languages, and Other Languages which will require LEP translation services. Additional data on the specific languages spoken in the City are unavailable using the 2018-2022 ACS estimates. The most recent data available for “Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over” in the City are from the 2011-2015 ACS 5-year estimates. Using the 2011-2015 dataset changes the “eligible population” (i.e. City’s population over the age of five years) to 225,151 persons. The table below shows these data for the City:

Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over, City of Irvine			
Language	Estimate	Margin of Error	% of Eligible Population
Total Population 5 Years and Over:	225,151	+/-1,052	100.000%
Speak only English	117,514	+/-3,033	52.193%
French (incl. Patois, Cajun):	930	+/-391	0.413%
Speak English "very well"	806	+/-375	0.358%
Speak English less than "very well"	124	+/-77	0.055%
French Creole:	48	+/-91	0.021%
Speak English "very well"	25	+/-45	0.011%
Speak English less than "very well"	23	+/-46	0.010%
Italian:	734	+/-344	0.326%
Speak English "very well"	652	+/-316	0.290%
Speak English less than "very well"	82	+/-65	0.036%
Portuguese or Portuguese Creole:	675	+/-405	0.300%
Speak English "very well"	483	+/-287	0.215%
Speak English less than "very well"	192	+/-136	0.085%
German:	833	+/-290	0.370%
Speak English "very well"	693	+/-231	0.308%
Speak English less than "very well"	140	+/-127	0.062%
Yiddish:	27	+/-42	0.012%
Speak English "very well"	27	+/-42	0.012%

Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over, City of Irvine			
Language	Estimate	Margin of Error	% of Eligible Population
Speak English less than "very well"	0	+/-28	0.000%
Other West Germanic languages:	250	+/-132	0.111%
Speak English "very well"	231	+/-122	0.103%
Speak English less than "very well"	19	+/-31	0.008%
Scandinavian languages:	138	+/-92	0.061%
Speak English "very well"	120	+/-87	0.053%
Speak English less than "very well"	18	+/-28	0.008%
Greek:	107	+/-87	0.048%
Speak English "very well"	78	+/-52	0.035%
Speak English less than "very well"	29	+/-45	0.013%
Russian:	1,637	+/-424	0.727%
Speak English "very well"	900	+/-290	0.400%
Speak English less than "very well"	737	+/-260	0.327%
Polish:	188	+/-104	0.083%
Speak English "very well"	177	+/-100	0.079%
Speak English less than "very well"	11	+/-17	0.005%
Serbo-Croatian:	235	+/-221	0.104%
Speak English "very well"	172	+/-164	0.076%
Speak English less than "very well"	63	+/-76	0.028%
Other Slavic languages:	145	+/-103	0.064%
Speak English "very well"	125	+/-98	0.056%
Speak English less than "very well"	20	+/-25	0.009%
Armenian:	465	+/-249	0.207%
Speak English "very well"	412	+/-233	0.183%
Speak English less than "very well"	53	+/-55	0.024%
Persian:	10,351	+/-1,690	4.597%
Speak English "very well"	6,374	+/-1,501	2.831%
Speak English less than "very well"	3,977	+/-701	1.766%
Gujarati:	1,184	+/-605	0.526%
Speak English "very well"	934	+/-504	0.415%
Speak English less than "very well"	250	+/-165	0.111%
Hindi:	3,007	+/-658	1.336%
Speak English "very well"	2,563	+/-667	1.138%
Speak English less than "very well"	444	+/-196	0.197%
Urdu:	2,042	+/-719	0.907%
Speak English "very well"	1,676	+/-558	0.744%

Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over, City of Irvine			
Language	Estimate	Margin of Error	% of Eligible Population
Speak English less than "very well"	366	+/-235	0.163%
Other Indic languages:	3,332	+/-896	1.480%
Speak English "very well"	2,728	+/-832	1.212%
Speak English less than "very well"	604	+/-242	0.268%
Other Indo-European languages:	869	+/-498	0.386%
Speak English "very well"	637	+/-383	0.283%
Speak English less than "very well"	232	+/-193	0.103%
Chinese:	25,158	+/-2,232	11.174%
Speak English "very well"	14,290	+/-1,347	6.347%
Speak English less than "very well"	10,868	+/-1,316	4.827%
Japanese:	4,637	+/-869	2.060%
Speak English "very well"	1,913	+/-505	0.850%
Speak English less than "very well"	2,724	+/-564	1.210%
Korean:	15,312	+/-2,407	6.801%
Speak English "very well"	9,020	+/-1,738	4.006%
Speak English less than "very well"	6,292	+/-1,135	2.795%
Mon-Khmer, Cambodian:	275	+/-191	0.122%
Speak English "very well"	123	+/-101	0.055%
Speak English less than "very well"	152	+/-105	0.068%
Hmong:	30	+/-26	0.013%
Speak English "very well"	7	+/-9	0.003%
Speak English less than "very well"	23	+/-24	0.010%
Thai:	584	+/-315	0.259%
Speak English "very well"	313	+/-205	0.139%
Speak English less than "very well"	271	+/-175	0.120%
Laotian:	76	+/-83	0.034%
Speak English "very well"	76	+/-83	0.034%
Speak English less than "very well"	0	+/-28	0.000%
Vietnamese:	6,928	+/-1,294	3.077%
Speak English "very well"	5,058	+/-1,162	2.246%
Speak English less than "very well"	1,870	+/-468	0.831%
Other Asian languages:	3,054	+/-611	1.356%
Speak English "very well"	2,504	+/-507	1.112%
Speak English less than "very well"	550	+/-227	0.244%
Tagalog:	3,330	+/-971	1.479%
Speak English "very well"	2,665	+/-928	1.184%

Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over, City of Irvine			
Language	Estimate	Margin of Error	% of Eligible Population
Speak English less than "very well"	665	+/-289	0.295%
Other Pacific Island languages:	970	+/-468	0.431%
Speak English "very well"	751	+/-457	0.334%
Speak English less than "very well"	219	+/-132	0.097%
Navajo:	0	+/-28	0.000%
Speak English "very well"	0	+/-28	0.000%
Speak English less than "very well"	0	+/-28	0.000%
Other Native North American languages:	38	+/-42	0.017%
Speak English "very well"	38	+/-42	0.017%
Speak English less than "very well"	0	+/-28	0.000%
Hungarian:	260	+/-192	0.115%
Speak English "very well"	245	+/-188	0.109%
Speak English less than "very well"	15	+/-24	0.007%
Arabic:	5,164	+/-1,325	2.294%
Speak English "very well"	3,374	+/-803	1.499%
Speak English less than "very well"	1,790	+/-743	0.795%
Hebrew:	631	+/-285	0.280%
Speak English "very well"	538	+/-265	0.239%
Speak English less than "very well"	93	+/-88	0.041%
African languages:	454	+/-316	0.202%
Speak English "very well"	266	+/-142	0.118%
Speak English less than "very well"	188	+/-193	0.083%
Other and unspecified languages:	78	+/-82	0.035%
Speak English "very well"	67	+/-72	0.030%
Speak English less than "very well"	11	+/-15	0.005%

Source: U.S. Census Bureau, 2011-2015 American Community Survey 5-Year Estimates (Table B16001)

Based on the 2011-2015 ACS data, shown in the table above, the following language groups meet the "safe harbor" criteria of containing 1,000 or more persons who speak English less than "very well" (none exceeded the threshold of five percent of the eligible population):

Persian (Farsi)

According to the 2011-2015 ACS estimates, of the various Indo-European languages, only the Persian language (Farsi) exceeds the 1,000-person threshold established under HUD's safe harbor guidance. Approximately 3,977 persons in the City of Irvine

who primarily speak Farsi indicated they spoke English less than “very well”. Based on this determination, the translation of vital documents into Farsi is required.

Chinese (Mandarin and Cantonese)

Approximately 10,868 persons over the age of 5 years, or 4.827 percent of Irvine’s population over the age of 5 years, speak Chinese at home and indicated they speak English less than “very well.”

The Chinese language provides challenges in that there are two (2) major written character systems, and seven (7) major dialects. The two (2) major written character systems are traditional Chinese and Taiwanese characters. Among the various dialects, the majority share the same traditional written Chinese character system, which can be utilized to translate vital documents for LEP persons.

Since the 10,868 Chinese speaking persons who indicated they speak English less than “very well” exceeds the HUD safe harbor thresholds of 1,000 persons, the translation of vital documents into Chinese is required. Based on City staff’s knowledge of, and prior experience with, City residents and program participants, Mandarin and Cantonese translation would be beneficial to the largest segment of the Chinese LEP population.

Japanese

Irvine has a Japanese speaking population of approximately 2,724 persons, or 1.210 percent of the eligible population. While the U.S. Census Bureau does not provide data regarding the number of persons speaking various Japanese dialects in Irvine, distinctions between the dialects are minimized by the growth of standard Japanese throughout Japan. Because the number of Japanese speakers who speak English less than “very well” exceeds HUD’s 1,000-person safe harbor threshold, vital documents are required to be translated into Japanese.

Korean

There are approximately 6,292 persons, or 2.80 percent of Irvine’s eligible population, that are Korean speakers and that speak English less than “very well.” As such, the Korean language exceeds the 1,000-person threshold provided under HUD’s safe harbor guidance, thereby requiring the translation of vital documents into Korean. While the Korean language contains local dialects, most are mutually intelligible with the standard Korean language of the Seoul region.

Vietnamese

There are approximately 1,870 Vietnamese-speaking persons, or 0.83 percent of Irvine’s eligible population, who speak English less than “very well.” The Vietnamese-speaking population is distributed over three major dialects that are differentiated by regions: Northern Vietnamese, Central Vietnamese, and Southern Vietnamese. While each of the dialects differs in sound systems, vocabulary, and grammar, there are numerous mutually intelligible regional dialects. Given this mutually intelligibility, for the purposes of this analysis, the Vietnamese language is treated as homogenous. Since the 1,870 Vietnamese speaking persons who speak English less than “very well” exceeds the HUD safe harbor threshold of 1,000 persons, the translation of vital documents into the Vietnamese language is required.

Arabic

According to the 2011-2015 ACS data, approximately 1,790 Arabic-speaking persons in Irvine speak English less than “very well”, which exceeds the 1,000 person threshold established under HUD’s safe harbor guidance. Based on this determination, the translation of vital documents into the Arabic language is required.

The following table summarizes the languages that meet the 1,000-person or 5 percent thresholds established under HUD’s safe harbor guidance, and for which, as a result, the translation of vital documents into is required.

Language groups with either 1,000 persons or more, or at least 5% of the eligible population, indicating that they speak English less than “very well”		
Language	Estimate	% of Eligible Population
Spanish:	18,296	6.4%
Speak English less than "very well"	2,554	0.9%
Persian:	10,351	4.597%
Speak English less than "very well"	3,977	1.766%
Chinese:	25,158	11.174%
Speak English less than "very well"	10,868	4.827%
Japanese:	4,637	2.060%
Speak English less than "very well"	2,724	1.210%
Korean:	15,312	6.801%
Speak English less than "very well"	6,292	2.795%
Vietnamese:	6,928	3.077%
Speak English less than "very well"	1,870	0.831%
Arabic	5,164	2.294%
Speak English less than "very well"	1,790	0.795%

Source: Data extracted from the “Language Spoken at Home” table for Spanish, and “Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over” table for Persian, Chinese, Japanese, Korean, Vietnamese, and Arabic

Language Access Plan

Based on the City's Analysis, the greatest need for LEP resources is in the provision of language translation services for Spanish, Persian (Farsi), Chinese (Mandarin and Cantonese), Japanese, Korean, Vietnamese, and Arabic speakers. To meet these needs, the City will implement the measures listed below.

1. The City's Communications & Engagement staff will ensure that translation is provided in the eight languages identified in the Four Factor Analysis: Spanish, Persian (Farsi), Chinese (Mandarin and Cantonese), Japanese, Korean, Vietnamese, and Arabic.

Provide Interpretation and Translation Services

2. Continue to provide free oral interpretation services for Spanish, Persian (Farsi), Chinese (Mandarin and Cantonese), Japanese, Korean, Vietnamese, and Arabic speakers, at the various facilities where the City provides federally-funded activities and services. Interpreters will be competent and have knowledge in both languages of the relevant terms or concepts particular to the program or activity and the dialect and terminology used by the LEP individual. City staff providing interpretation services will have passed their respective language proficiency examination.

3. While interpretation services are generally available, enhanced efforts are generally required in the provision of translation services for vital documents. "Vital documents" are those that are critical for ensuring meaningful access by beneficiaries or potential beneficiaries generally and LEP persons specifically, to activities supported by federal funds or that are required by law. Vital documents contain information that is critical for obtaining or maintaining services or benefits to the LEP populations they serve. Such documents may include but are not limited to outreach materials, applications, consent and complaint forms, notices of participant rights and responsibilities, notices of denial, loss, or decreases in benefits or services, disciplinary notices, letters or notices that require a response from the participant or beneficiary, hearing notices, legal notices, notices of public hearings, especially those that meet HUD's Community and Planning Development citizen participation requirement, leases and tenant rules, applications to participate in a federally funded program or activity or to receive benefits or services, and notices advising LEP persons of the availability of free language services.

As necessary, the City shall perform written translations for all documents deemed vital for each program offered for all the language needs identified in the Four Factor Analysis: Spanish, Persian (Farsi), Chinese (Mandarin and Cantonese), Japanese, Korean, Vietnamese, and Arabic.

The City further commits to the following:

- a. All Public Notices published pursuant to the Citizen Participation Plan shall include a statement in the Spanish, Persian (Farsi), Chinese (Mandarin and Cantonese), Japanese, Korean, Vietnamese, and Arabic languages, indicating the availability of interpretive services upon request.
 - b. For subrecipients who anticipate or experience frequent contact with LEP persons, the City shall encourage them to translate outreach and vital documents, provided that sufficient resources are available.
 - c. Where larger documents are encountered which contain both vital and non-vital information, and the provision of multiple translations is not deemed to be a feasible option, the document shall at a minimum contain translations in the languages identified in the Four Factor Analysis of the contact information directing LEP persons to available interpretation or translation services.
4. Provide content in Spanish, Persian (Farsi), Chinese (Mandarin and Cantonese), Japanese, Korean, Vietnamese, and Arabic on the main page(s) of the program website(s). Additionally, the City's website allows users to translate content into these languages via Google Translate.
 5. Explore access to community-based services to provide additional translation and interpretation services for the languages identified in the Four Factor Analysis.
 6. As necessary, assist subrecipients in assessing their potential LEP translation needs and in developing an appropriate course of action based on the assessment.
 7. For handling verbal and written communication with LEP individuals in less frequently encountered languages, the City will utilize bilingual staff and a language line service for telephone conversations between City staff and LEP persons who speak a language for which no bilingual staff are available.

Provide Notices to LEP Persons

8. Where feasible, provide a posted sign in intake areas advising of the availability of free LEP language services.
9. On all printed materials, include a "tag line" that states "For more information, please call 1-XXX-XXX-XXXX" translated into all eight languages identified in the Four Factor Analysis.
10. Conduct targeted outreach to LEP populations via community contacts and ethnic and foreign media. The City maintains a multilingual media distribution list of media outlets that receive all press releases and other pertinent City information. Additionally, the City places ads in-language in media publications in all eight of the City's languages identified in the Four Factor Analysis.

Attachment C

Complaint Process of Discrimination Based on Title VI of the Civil Rights Act of 1964 and Other Related Statutes

Introduction

The Title VI (and related statutes) complaint process is intended to provide a complainant an avenue to raise complaints of discrimination regarding the City of Irvine's programs, activities, and services as required by statute.

Purpose

The purpose of the discrimination complaint process is to identify complaints filed under Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, the Age Discrimination in Employment Act of 1967, Civil Rights Restoration Act of 1987, the Americans with Disabilities Act of 1990, Executive Order 12898 Environmental Justice, Executive Order 13166 Limited English Proficiency, and applicable Department policies. Any person who feels that they have been subjected to discrimination based on race, color, or national origin, has the right to file a complaint with the City of Irvine Human Resources. Additionally, the City of Irvine Human Resources will also accept complaints outside of Title VI that relate to gender, age, disability, or income discrimination.

Title VI Complaints must be filed within 180 days of the alleged discriminatory event or practice. Complaints must be filed in person or online at: cityofirvine.org/titlevi. Questions or concerns should be directed to:

City of Irvine
Attn: Title VI Coordinator and ADA Compliance Officers
PO Box 19575
Irvine, CA 92623
ADACompliance@cityofirvine.org

This process does not deny or limit the right of a complainant to file a formal complaint with an outside enforcement agency (BOLI, EEOC, U.S. Dept. of Transportation, FHWA, FTA, or U. S. Dept. of Justice) or to seek private counsel for complaints alleging discrimination. Every effort will be made to obtain early resolution of complaints at the lowest possible level.

Filing of Formal Complaints

1. **APPLICABILITY:** This process applies to the beneficiaries of City of Irvine's programs, activities, and services, including but not limited to the public and other sub-recipients of Federal and State funds.
2. **ELIGIBILITY:** Any person who believes that they have been excluded from participation in or have been denied benefits or services of any program or activity administered by

the City of Irvine on the basis of race, color or national origin, sex, age, or disability may bring forth a complaint of discrimination under Title VI and related statutes.

3. TIME LIMITATIONS AND FILING OPTIONS:

- Title VI complaints of discrimination may be filed with:
 - The City of Irvine
 - Federal Highway Administration (transportation related)
 - Federal Transit Administration (transportation related)
 - U.S. Department of Transportation (transportation related)
- Complaints must be filed no later than 180 days after:
 - The date of the alleged act of discrimination; or
 - The date when the person(s) became aware of the alleged discrimination; or
 - Where there has been a continuing course of conduct, the date on which the conduct was discontinued.

4. TYPE OF COMPLAINTS; All Title VI and related statute complaints are considered formal complaints and must be made in writing and signed by the complainant. Complaints must include the complainant's personal and contact information and be detailed to specify all issues and circumstances of the alleged discrimination.

5. COMPLAINT BASIS: Allegations must be based on issues involving race, color, national origin, sex, age, or disability. The term “basis” refers to the complainant's protected group status.

Protected Group Categories	Definition	Examples
Race	An individual belonging to one of the accepted anthropological racial groups; or the perception, based on physical characteristics that a person is a member of a racial group.	Black, White, Hispanic, Asian, Native American Indian, Filipino, or Pacific Islander
Color	Color of skin, including shade of skin within a racial group.	Black, white, light brown, dark brown, etc.
National Origin	National birth site. Citizenship is not a factor. Discrimination based on language or a persons accent is covered by national origin.	Mexican, Cuban, Japanese, Vietnamese, Chinese
Sex	Gender	Women and men
Age	Persons of any age	21 year old person
Disability	Physical or mental impairment, permanent or temporary, or perceived.	Blind, deaf, mobility limitations, etc.

Complaint Processing

1. **INITIAL CONTACT:** The Title VI Coordinator and ADA Compliance Officers assigned to Human Resources are the point of contact for members of the public who wish to file a discrimination complaint under Title VI and related statutes. These staff members will provide complainant with:
 - An explanation of the complaint process.
 - Options to file with outside agencies
2. **THE COMPLAINT REVIEW PROCESS:**
 - Human Resources reviews the complaint upon receipt to ensure that relevant information is provided, the complaint is timely, and meets jurisdiction.
 - The complaint shall be investigated unless:
 - The complaint is withdrawn.
 - The complainant fails to provide required information after numerous requests.
 - The complaint is not filed timely.
 - Any issues that do not involve discrimination or are not based on a protected basis will be directed to the appropriate entity. Under no circumstance will the complainant be discouraged from filing a complaint.
3. Upon determination that the complaint warrants an investigation, the complainant is sent a letter, acknowledging receipt of the complaint, the name of the investigator, and is provided with his/her rights under Title VI and related statutes.
4. The complainant is notified by mail that he/she has been named in a complaint and is provided with his/her rights under Title VI and related statutes. The letter also reveals the investigator's name and informs the complainant that he/she will be contacted for an interview.
5. A letter is sent to the appropriate City department Managers will be informed that a complaint has been filed; the letter will list the names of the parties involved, the basis of the complaint and the assigned investigator. Title VI Officer is responsible for the overall Title VI complaint management process.

Investigation

1. INVESTIGATION PLAN

- The investigator shall prepare a written plan, which includes, but is not limited to the following:
 - Name(s) of the complainant(s);
 - Basis for the complaint;
 - Issues, events, or circumstances that caused the person to believe that they were discriminated against;
 - Information needed to address the concern/complaint;
 - Criteria or sources necessary to obtain information;
 - Identification of key people;

- Estimated Investigation timeline;
- Remedy sought by complainant(s)

2. CONDUCTING THE INVESTIGATION

- The investigation will address only those issues relevant to the allegations in the complaint. Confidentiality will be maintained as much as possible.
- Interviews will be conducted to obtain facts and evidence regarding the
- allegations in the complaint. The investigator will ask questions to elicit information about aspects of the case, which the witness can provide firsthand information. Interviews can be tape recorded with the interviewees consent. A chronological contact sheet is maintained in the case file throughout the
- investigation.
-

3. INVESTIGATION REPORTING PROGRESS

- Within 30 days of receiving the complaint, the investigator will prepare an investigation report and will submit a written report and supporting documentation to the Director of Human Resources for review. The written report will include:
 - Date of written complaint;
 - Complaint basis (race, color, national origin, sex, age, or disability);
 - Complaint resolution and corrective action taken
- The Director will review the file and investigation report and will make a final determination of “probable causes” or “no cause” as well as corrective actions and prepares a final decision letter for signature.
- A copy of the decision letter is then sent to the complainant within 30 days of the City’s receipt of the complaint.

Records

All records and investigative working files are confidentially maintained by the Employee Relations division of the City of Irvine Human Resources. Records will be kept in accordance with the City’s retention schedule.

Authorities/Relevant Statutes

- Title VI of the Civil Rights Act of 1964, (42 USC 2000d to 2000-4): Title VI of the 1964 Civil Rights Act provides that no person in the United States shall, on the grounds of race, color, or national origin (including Limited English Proficiency), be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving federal financial assistance.
- The Civil Rights Restoration Act of 1987, (Pub. L. No. 100-259): The Civil Rights Restoration Act of 1987 broadens the scope of Title VI by expanding the definitions of terms “programs or activities” to include all programs or activities of Federal Aid recipients, sub-recipients, and contractors.
- 23 CFR 200 and 49 CFR 21: 23 CFR 200 and 49 CFR 21 are administrative Regulations from USDOT and FHWA that specify requirements for state DOTs to implement Title VI policies and procedures at the state and local levels.
- Federal Aid Highway Act of 1973, (23 USC 324): The Federal Aid Highway Act of 1973 provides that no person on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal assistance.
- Age Discrimination Act of 1975, (42 USC 6101): The Age Discrimination Act of 1975 provides that no person in the United States shall, on the basis age, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal assistance.
- Americans With Disabilities Act of 1990, (Pub. L. No. 101-336): The Americans with Disabilities Act of 1990 provides that no qualified individual with a disability shall, by reason of such disability, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination by a department, agency, special purpose district, or other instrumentality of a state or a local government.
- Section 504 of the Rehabilitation Act of 1973: Section 504 of the Rehabilitation Act of 1973 provides that no qualified person with disabilities, shall, solely by reason of his/her handicap, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal assistance.
- Executive Order 12898: Executive Order 12898 regards federal actions to address Environment Justice in minority populations and low-income populations.
- Executive Order 13166: Executive Order 13166 regards the improvement of access to services for persons with limited English proficiency.



CITY OF IRVINE

INCIDENT/CONTACT REPORT

ADA TITLE II AND TITLE VI NON-DISCRIMINATION GRIEVANCE FORM

Please complete and submit this in its entirety. This form is optional for visitors, residents, and public. This is not for employment or employee related issues.

CONTACT INFORMATION

GRIEVANT NAME			PHONE*
ADDRESS*			ALTERNATE PHONE*
CITY	STATE	ZIP	EMAIL*

If a legally authorized representative is filing the grievance on your behalf, provide the following information:

REPRESENTATIVE NAME			PHONE*
ADDRESS*			ALTERNATE PHONE*
CITY	STATE	ZIP	EMAIL*

If your grievance is being filed on behalf of another person or a group of people, all of the grievant(s) should be described or identified by name, if possible.

GRIEVANT PARTY DESCRIPTION/NAME(S)

INCIDENT DETAILS

DATE OF INCIDENT	TIME <input type="checkbox"/> AM <input type="checkbox"/> PM	LOCATION
WHY DO YOU BELIEVE THE DISCRIMINATION OCCURED?		
<input type="checkbox"/> RACE OR COLOR	<input type="checkbox"/> AGE	<input type="checkbox"/> DISABILITY
<input type="checkbox"/> NATIONAL ORIGIN	<input type="checkbox"/> SEX	<input type="checkbox"/> OTHER: _____

INCIDENT/CONTACT REPORT

DESCRIBE YOUR GRIEVANCE:

WHAT TYPE OF CORRECTIVE ACTION WOULD YOU LIKE TO SEE TAKEN?

WAS THERE A CODE OF CONDUCT VIOLATION?

☐ YES ☐ NO ☐ UNKNOWN

PROVIDE WITNESS NAME(S) AND CONTACT INFORMATION, IF ANY:

1. PHONE*:

2. PHONE*:

IF THE INCIDENT INVOLVED CITY OF IRVINE EMPLOYEE(S), PLEASE INCLUDE HIS/HER NAME(S):

1. 3.

2. 4.

POLICE REPORT #	OFFICER CONTACT	PHONE*
FIRE REPORT #	FIREFIGHTER CONTACT	PHONE*

GRIEVANT SIGNATURE

DATE

-OR-

AUTHORIZED REPRESENTATIVE SIGNATURE
ON BEHALF OF GRIEVANT

Attachment D

City of Irvine Public Participation Plan

The City of Irvine Public Participation Plan provides a structured and inclusive approach for engaging Irvine residents, businesses, and stakeholders in City decision-making processes, ensuring transparency, equity, and collaboration on its federally funded programs and activities. This plan will document the City's commitment to the community and set forth the actions the City will take to keep the community informed in a timely fashion, and to provide opportunities for community participation in the decision-making process. This plan will be reviewed and updated yearly as needed.

Introduction

The City of Irvine's Public Participation Plan is organized to work in conjunction with the Title VI Plan and the Language English Proficiency Plan. Special attention will be paid to soliciting input from communities that are traditionally underrepresented. The City's Access Irvine App is a tool readily available to make a request, complaints, or comments and serves as effective channels of communication for the City to engage the citizenry.

A variety of outreach techniques will be used to elicit input in cooperation with the Citizen Participation Plan required by the U.S. Department of Housing and Urban Development (HUD). Materials will be developed with the understanding that there are individuals with Limited English Proficiency and will be translated in other languages upon request.

Objectives

The City's Citizen Participation Plan has a single comprehensive goal: to set forth the City of Irvine's policies and procedures for providing citizens and other interested parties with opportunities to participate in an advisory role in the planning, implementation, and evaluation of funding the City has received. This plan also allows the public a variety of opportunities throughout the planning process to influence and understand decisions.

In order to meet this goal, the City has established the following objectives:

1. **Encourage Broad Participation:** Reach diverse demographics across Irvine, including underrepresented and vulnerable populations.
 - Identify the most appropriate methods for reaching the public.
 - Determine any barriers associated with public participation within the City of Irvine.
 - Hold meetings that are accessible and welcoming to all area residents, including but not limited to, low-income and minority members of the public.
2. **Enhance Transparency:** Provide clear and timely information about city projects, policies, and decisions.
 - Keep the public informed through effective channels of communication and allow input from those not likely to attend meetings.
3. **Foster Collaboration:** Promote meaningful dialogue between the community, stakeholders, and city staff.
 - Work to actively involve the public in programs, policymaking, and projects.
 - Ensure that the City's public involvement plan is dynamic and responsive.
4. **Support Decision-Making:** Use community input to guide planning and policymaking effectively.
 - Use various illustrative visualization techniques to convey the information including but not limited to charts, graphs, photos, maps, and the internet.

Outreach Techniques and Methods of Communication

The City will adapt communication and outreach based on the needs of the community and will utilize a variety of communication methods, including social media, public meetings, email newsletters, online surveys, multilingual materials, and local radio or newspaper announcements, to ensure broad and inclusive public participation.

The City of Irvine Public Participation Plan will use a variety of communication methods to reach and engage diverse audiences. These methods can be categorized into digital, in-person, and traditional media approaches to maximize reach. Here's a list of communication methods the City may utilize:

Digital Communication Methods

- 1. City Website:**
 - o Dedicated webpages for projects, updates, and input opportunities.
 - o Online forms or comment submission portals.
- 2. Social Media Platforms:**
 - o Posts, live streams, and event announcements on Facebook, Twitter, Instagram, and Nextdoor.
 - o Social media polls and interactive Q&A sessions.
- 3. Digital Newsletters:**
 - o Regular updates about city initiatives, events, and participation opportunities.
- 4. Online Surveys and Polls:**
 - o Tools like SurveyMonkey or Microsoft Forms for collecting feedback.
- 5. Virtual Meetings:**
 - o Video conferencing platforms like Zoom or Microsoft Teams public hearings and workshops.
- 6. Mobile Applications:**
 - o City apps offering real-time updates and feedback features.
- 7. Text Messaging Services:**
 - o SMS alerts for key announcements or reminders.
- 8. Digital Advertising:**
 - o Targeted ads on search engines, social media, and local websites.

In-Person Communication Methods

- 1. Community Meetings:**
 - o Town halls, workshops, and neighborhood discussions.
- 2. Pop-Up Events:**
 - o Outreach booths at public events, parks, or other community facilities.
- 3. Advisory Committees and Commissions:**
 - o Groups of stakeholders meeting regularly to discuss city issues.
- 4. Public Forums:**
 - o Open events for residents to voice opinions and ask questions.
- 5. Stakeholder Focus Groups:**
 - o Small, targeted sessions for specific community groups.
- 6. Office Hours:**
 - o Scheduled times for one-on-one discussions with city staff or officials.

Traditional Media Methods

- 1. Newspaper Ads:**
 - o Public notices, meeting announcements, and project details in local print and online outlets.

2. **Press Releases:**
 - o Official announcements distributed to media outlets for coverage.
3. **Television Spots:**
 - o Announcements or discussions on local cable channels.
4. **Flyers and Posters:**
 - o Distributed in community centers, libraries, schools, and other high-traffic areas.
5. **Direct Mailings:**
 - o Letters or postcards sent to residents with event invitations or updates.

Inclusive and Accessible Communication Methods

1. **Multilingual Outreach:**
 - o Materials and events provided in multiple languages commonly spoken in the community.
2. **ASL Interpretation and Closed Captioning:**
 - o Services for virtual and in-person events to assist individuals with hearing impairments.
3. **Braille Materials:**
 - o Printed resources for visually impaired residents.
4. **Community Liaisons:**
 - o Trusted individuals or organizations serving as intermediaries to engage hard-to-reach populations.

By combining these methods, the City of Irvine can ensure widespread, inclusive, and effective communication for public participation.

Key Components

1. Facility Information

The City of Irvine manages a variety of public facilities and services that fall under the scope of Title VI compliance, including:

- **Community Centers:** Facilities offering recreational, cultural, and educational programs.
- **Transit Services:** Partnerships with transit agencies like the Orange County Transportation Authority (OCTA) to provide public transportation.
- **Public Parks and Open Spaces:** Maintenance and operation of parks, trails, and sports facilities.
- **Public Meetings and Hearings:** Locations where residents can participate in the city's decision-making processes.
- **Civic Buildings:** City Hall, libraries, and other administrative buildings serving the public.

2. Stakeholder Identification

Identify all relevant groups, including:

- Residents from various neighborhoods.
- Community organizations and advocacy groups.
- Local businesses and economic stakeholders.
- Educational institutions (e.g., UC Irvine).
- Underserved populations (e.g., low-income, non-English-speaking residents).
- Youth and senior citizens.

3. Communication Strategies

Utilize diverse and accessible channels to reach all stakeholders:

- **Online Platforms:** City website, social media, and email newsletters.
- **Public Notices:** Flyers, posters, and announcements in public spaces like libraries and community centers.
- **Media Outreach:** Press releases to local newspapers, radio, and TV stations.
- **Multilingual Materials:** Translate materials into commonly spoken languages (e.g., Spanish, Mandarin, Korean) in Irvine.

4. Public Engagement Methods and Involvement Activities

Use a mix of interactive and informational methods:

- **Community Meetings:** Host in-person and virtual town halls at convenient times and locations.
- **Workshops and Focus Groups:** Tailor these sessions to specific issues or demographics.
- **Surveys and Polls:** Offer both digital and paper formats to gather broad input.
- **Advisory Committees:** Form citizen committees to provide ongoing input on major projects.
- **Pop-Up Engagements:** Conduct outreach at events like farmers' markets or festivals.

5. Accessibility and Inclusion

Ensure all residents can participate:

- **ADA Compliance:** Provide accommodations for persons with disabilities.
- **Digital Divide:** Offer options for those without internet access, such as phone hotlines or in-person drop-ins.
- **Childcare and Transportation:** Provide childcare services and accessible venues to encourage attendance.

6. Feedback Mechanisms

- **Transparent Reporting:** Publish summaries of public input and explain how it influenced decisions.
- **Follow-Up:** Provide updates on project statuses and ongoing opportunities for input.
- **Two-Way Communication:** Enable ongoing dialogues through open forums or Q&A sessions.

7. Monitoring and Evaluation

- Track participation metrics, such as meeting attendance, survey response rates, and demographic representation.
- Regularly evaluate the effectiveness of outreach strategies and adapt as needed.
- Share annual public participation reports with the community.

These activities demonstrate a commitment to equity, ensuring meaningful participation by all individuals, regardless of race, color, national origin, or income level, in alignment with Title VI requirements. The City of Irvine will catalog all meetings, and feedback received on federally funded programs and activities and will publish information on program beneficiaries annually.