

2023 Title VI Annual Report

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City of Greenwood Title VI Policy and Implementation Plan

Title VI Policy

The City of Greenwood (“City”) Title VI Policy and Implementation Plan was adopted September 16, 2016. The City of Greenwood is committed to compliance with Title VI of the Civil Rights Act of 1964, 49 CFR, part 2 (“Title VI”), the Civil Rights Restoration Act of 1987, and all related federal regulations and directives, including Title VII of the Civil Rights Act of 1964, 29 CFR, Section 504 of the Rehabilitation Act of 1973, the Americans with Disabilities Act of 1990 (“ADA”), and related state laws and regulations.

The City’s commitment to its Title VI Implementation Plan assures that no person or group(s) of persons shall, on the grounds of race, color, age, sex, sexual orientation, gender identity, disability, national origin, religion, income status, veteran status, limited English proficiency, or any other protected classification under federal law, be excluded from participation in, or be denied benefits of, or be otherwise subjected to discrimination under any and all programs or activities administered by the City, whether or not those programs or activities are federally funded. Additionally, the City provides meaningful access to services for persons with Limited English Proficiency.

A notice and copy of the City’s Title VI Policy and Implementation Plan is available on the City’s website at www.greenwood.in.gov. A Title VI policy notice is also posted at all City office buildings.

Title VI Complaints

The City provides a formal procedure to address and resolve the complaint of any person or group of persons who believes that he, she, or they have been subjected to an unlawful discrimination practice, or who believes that he, she or they have been excluded from or denied benefits of any program or activity administered by the City. The complaint procedure is detailed in the Title VI Policy and Implementation Plan. The City maintains a log of complaints filed alleging discrimination in violation of the Title VI Policy that includes the date of filing; the date the complaint investigation is completed; the date the investigation complaint is referred to the Board or Commission with jurisdiction of the subject program or activity for action; final disposition of the complaint (including date); and corrective action taken, if any.

The City had no Title VI complaints, investigations, or lawsuits for the 2023 Reporting period.

2023 Title VI Annual Accomplishments

The City continues to conduct public meetings in person with the option to participate by electronic means to promote more inclusive opportunities for public participation. Pursuant to the City’s Title VI Policy and Implementation Plan, Department Heads conducted an annual review of programs and activities under their supervision, and accomplished the following:

- All City contracts reviewed and approved by the Legal Department included non-discrimination clauses requiring compliance with applicable Title VI and Title VII related regulations. The Legal Department continued to provide a staff member, the

City Attorney, to act as the City's Title VI Coordinator for non-employment matters. The City Attorney participated in a U.S. Dept. of Justice Title VI Compliance Training webinar in February 2023.

- The Human Resources Department conducted Title VI training as a component of new hire orientation, with verification placed in the employee's personnel file and implemented new e-learning materials with alternatives for those with impairments. The Human Resources Director continues to use a "Translate" application on her cell phone to assist in communication with persons who have limited English proficiency. The Human Resources Director also acts as the City's Title VI Coordinator in employment matters and participated in a U.S. Dept. Of Justice Title VI Compliance Training webinar in February 2023.
- The Police Department had the sidewalks on the west side of the Justice Building modified to reduce risks of falls and is working with the City Engineer to install additional handicap parking spaces and sidewalk ramps on the west side of the building. The Department continued use of a service called "LTC Language Solutions" that provides translation services with 24 hours a day, 7 days a week, availability, that includes over 200 spoken languages and American Sign Language (ASL) to assist in communication with diverse populations and those with limited English proficiency.
- The Fire Department continued to use a variety of translation software application systems in its electronic devices to assist in communication with diverse populations and those with limited English proficiency. It continues to work with Johnson County resources (including the Sheriff) to develop a call list for translation services to adequately communicate with populations who have limited English proficiency.
- The City Court conducted remote hearings to provide those who are unable to physically attend with the opportunity to have their cases heard. The Court and the Probation Department arranged in-person or telephone interpreters for non-English speaking individuals, including those with hearing impairments, to promote accessibility and use of services; in cases where translation/interpretation arrangements could not be made, matters were transferred to the Johnson County courts. The Court and Probation Department continue review of facilities and programs to provide for full accessibility to all members of the public.
- The City Clerk maintains a Johnson County telephone number for translation service and a written form with various languages as resources to assist staff in communicating with persons who have limited English proficiency as needed
- The Finance Department continued to use and promote the low vision billing statement option on the City's website, and used online translating technology to communicate with customers and members of the public with limited English proficiency. The Department introduced a new customer payment portal to improve user friendliness.
- The Street Department repaired 616, and its leveling contractor repaired 253, sidewalk trip hazards throughout the City reported by members of the public, installed or repaired 8 ADA ramps, and continued to maintain a database of repair locations for which it has received notice and requests.
- The Aviation Department provided ADA accommodations to customers, volunteers, and employees; it worked with the Legal Department to ensure Title VI provisions were included in all contracts and bid documents; and conducted employee discussions regarding Title VI and ADA compliance.
- The Information Technology Department worked with Departments throughout the City to provide accessible online resources to the public regarding services and

programs, including the City Works online permitting program, RecTrac registration for Park and Recreation Department recreation programs, online sanitation bill payment through CIS, and creation of links on the City website to the resources. The Department maintained the video conferencing services that provide the electronic platforms to conduct meetings (public and internal) and provides a designated staff person to attend public meetings in person to assist with technology needs.

- The Department of Community Development Services (CDS) continues to manage all public works projects in compliance with best practices and standards for accessibility in design and construction, including the ADA, Public Rights-of-Way Accessibility Guidelines (PROWAG), and building code, which primarily includes pedestrian facilities such as curb ramps, sidewalks, and multi-use trails included in new construction, replacement, reconstruction, or maintenance programs. CDS staff perform inspections to ensure accessibility requirements are met. CDS staff ensure that an evaluation of environmental impact on protected populations is conducted regarding projects and worked with the Legal department to ensure Title VI provisions were included in all contract and bid documents. Additionally, CDS is currently working toward completion of an update to the City's ADA Transition Plan and placed permits, applications and payment options online. CDS continued to provide a staff member, the City Engineer, to act as the City's ADA Coordinator, who is responsible for arranging reasonable accommodation for persons wishing to participate in public meetings.
- The Park and Recreation Department implemented use of language cards in Spanish and various Chin dialects at Freedom Springs Aquatic Center and is preparing additional cards for use at the Community Center and the Field House to assist communication with those particular limited English speakers. Staff also used translation software application systems in their electronic devices to assist in communication with diverse populations and those with limited English proficiency. The Department continued to assess its programming and facilities to ensure programs and facilities are designed to be inclusive of all ages, abilities, and populations with limited English proficiency. Assessment includes attention to structure of spaces used and formats in which information is presented to promote inclusivity.
- The Department of Stormwater Management continued to offer online and in person education and outreach events which were designed to accommodate persons with disabilities. The Department used translation software application systems in its electronic devices to assist in communication with diverse populations and those with limited English proficiency.
- Utilizing federal Community Development Block Grant (CDBG) funds, the City continued its construction activities to provide additional park and recreation facilities in a low-to-moderate income area of the City with the construction of a new bathroom and new shelter at Northeast Park, and focused on expanding public services in the community. It inaugurated an owner-occupied residence repair with Habitat for Humanity of Johnson County, assisting a moderate-income family by performing essential repairs that allowed the resident to remain in the home. The City has an open application process for local service providers and affordable housing providers to apply for CDBG funding and it continued to provide grants using CDBG Cares Act Funds to local non-profits to help segments of the population whose income was adversely impacted by the COVID-19 public health emergency with housing, transportation, and food assistance. The CDBG fund program is

administered through the Mayor's office by the Capital Projects Manager, who ensures that all contracts for construction projects or programs are compliant with Title VI and related laws and regulations. The City is in its fourth year as an Entitlement Community and filed its Consolidated Annual Performance Report (CAPER) with the U.S. Department of Housing and Urban Development setting forth the program accomplishments achieved through the grant funds.

Summary and 2024 Title VI Goals

The City remains committed to promoting an environment where all people are included and encouraged to participate in City programs, and to promoting equal and fair treatment of all persons participating in programs or who are impacted by City projects. In 2023, the City increased its use of resources to communicate with persons who have limited English proficiency and continued to evaluate the impact of proposed projects on diverse and low-income populations before determining scope and proceeding. The City remains committed to Title VI and plans to take additional action to promote equality in programs and projects and their impact in 2024 as follows:

- Continue to include non-discrimination clauses requiring compliance with applicable Title VI and Title VI related regulations in City contracts
- Continue to include ADA compliance in the design, specification, and equipping of public works construction projects, continue to comply with Title VI requirements on public works projects, including evaluation of impacts of projects on low income or minority populations
- Continue to repair ramps and sidewalks reported as hazards or barriers by members of the public and install ramps where requested to improve accessibility
- Complete the update of the City's ADA Transition Plan to continue to eliminate barriers that may be discovered and improve accessibility for participation in programs and activities and upgrade City facilities as needed to improve accessibility
- Continue to implement and assess programs and services for customers and members of the public to communicate effectively with those with limited mobility or English proficiency
- Continue to provide more services such as permit applications and payment options online as feasible
- Continue to monitor City programs or activities that receive Federal funds or other Federal financial assistance so they do not discriminate, are accessible and provide for meaningful public input, are inclusive, and do not disproportionately impact protected classifications of persons adversely
- Provide refresher Title VI and ADA training and education opportunities to all staff
- Research resources available across all formats for training/seminars for Title VI and Title VI related training
- Use CDBG funds for projects that promote economic development activities and provide assistance for the low-and-moderate-income and special needs segment of the population; provide public participation opportunities for programs impacting these populations in the decision making process for programs
- Review 2020 decennial Census and other available data to update the determination of the proportion of the City's population who do not speak English or speak and understand it with limitation, and conduct a limited English proficiency (LEP) survey

to assess/evaluate whether there is a reasonable need for an LEP Plan to improve program and service areas

Specific action taken will be documented in the City's 2024 Annual Report.