

Note: The following is a suggested Title VI Plan template for the Kansas Adjutant General Department's Federal Grant Subrecipients. For specific Title VI Plan requirements, refer to your grant program guidance from KDEM located at http://www.kansastag.gov/kdem_default.asp

Title VI Civil Rights Plan for Kansas Adjutant General's Department Federal Grant Subrecipients

Harper County Emergency Management
(Name of Agency and Department)

March 2nd, 2020
(Date)

Prepared by: Christina R. Cintron, Director
(Name and Job Title)

I. Non-Discrimination Policy Statement

It is the policy of Harper County Emergency Management that no person shall on the grounds of race, color, national origin, sex, disability, or age, be excluded from participation in, be denied the benefits of, or be subjected to discrimination in any operation of Harper County Emergency Management as provided by Title VI of the Civil Rights Act of 1964 and related statutes.

This policy applies to all operations of Harper County Emergency Management, including its contractors and anyone who acts on behalf of Harper County Emergency Management. This policy also applies to the operations of any department or agency to which Harper County Emergency Management extends federal financial assistance. Federal financial assistance includes grants, training, use of equipment, donations of surplus property, and other assistance.

Prohibited discrimination may be intentional or unintentional. Seemingly neutral acts that have disparate impacts on individuals of a protected group and lack a substantial legitimate justification are a form of prohibited discrimination. Harassment and retaliation are also prohibited forms of discrimination.

Examples of prohibited types of discrimination based on race, color, national origin, sex, disability, or age include: Denial to an individual any service, financial aid, or other benefit; Distinctions in the quality, quantity, or manner in which a benefit is provided; Segregation or separate treatment; Restriction in the enjoyment of any advantages, privileges, or other benefits provided.

Title VI compliance is a condition of receipt of federal funds. The Title VI Coordinator is authorized to ensure compliance with this policy, Title VI of the Civil Rights Act of 1964, 42 U.S.C § 2000d and related statutes, and the requirements of 6 C.F.R. parts 15, 17, 19, and 21, and 44 C.F.R. parts 16 and 19.


(Top Agency or Department Official)

March 2nd 2020
Date

II. Organization, Staffing, and Structure

Title VI Nondiscrimination Coordinator is ultimately responsible for assuring full compliance with the provisions of Title VI of the Civil Rights Act of 1964 and related statutes and has directed that non-discrimination is required of all agency employees, contractors, and agents pursuant to 6 C.F.R. parts 15, 17, 19, and 21, and 44 C.F.R. parts 16 and 19.

Harper County Emergency Management has created the position of Title VI Nondiscrimination Coordinator to perform the duties of the Title VI Coordinator and ensure implementation of agency's Title VI program. The position of Title VI Nondiscrimination Coordinator is located within Harper County Emergency Management.

The Title VI Coordinator is responsible for:

- Submitting a Title VI plan and annual reports on the agency's behalf;
- Developing procedures for the prompt processing and disposition of complaints;
- Investigating complaints, compiling a complaint log, and reporting to the Kansas Adjutant General's Department (KDEM).
- Developing a program to conduct Title VI reviews of program areas;
- Conducting annual Title VI assessments of pertinent program areas;
- Developing Title VI information for dissemination;
- Ensuring staff are trained in Civil Rights laws and policies prohibiting discrimination.

Add any other information about the Title VI Coordinator's responsibilities and/or the agency's organizational structure. An organizational chart should be attached as a supplement to this description.

III. Title VI Complaint Procedures

Describe how your complaint procedures are disseminated to the public, state whether they are translated in other languages, and provide a copy of your complaint procedures. Below is a sample complaint procedure.

Discrimination Complaint Procedure for Harper County Emergency Management

Federal law prohibits discrimination on the basis of race, color, national origin, age, sex, or disability in any Harper County Emergency Management program or activity. This prohibition applies to all branches of Harper County Emergency Management, its contractors, consultants, and anyone else who acts on behalf of Harper County Emergency Management.

Federal law requires that Harper County Emergency Management investigate, track, and report discrimination complaints. Complaints must be filed in writing and will be investigated within sixty days of submission. If you need assistance to file your complaint or need interpretation services, please contact Title VI Nondiscrimination Coordinator.

Who is eligible to file a complaint?

Anyone who believes they have been excluded from participation in, denied the benefits of, or otherwise subjected to discrimination under any Harper County Emergency Management program or activity because of their race, color, national origin, age, sex, or disability may file a complaint.

Discrimination includes lack of access, harassment, retaliation and disparate impacts from a program or activity. Harassment includes a wide range of abusive and humiliating verbal or physical behaviors. Retaliation includes intimidating, threatening, coercing, or engaging in other discriminatory conduct against anyone because they filed a complaint or otherwise participated a discrimination investigation.

How do you file a complaint?

Complaints must be filed in writing within 180 days from the last date of the alleged discrimination. However, contact Title VI Nondiscrimination Coordinator if you believe your complaint may fall outside this deadline.

Reasonable efforts will be made to assist persons with disabilities, non-English speakers, and others unable to file a written complaint. For assistance in filing a complaint, please contact Title VI Nondiscrimination Coordinator.

Complaints may be submitted via mail, email, fax or in person to:

Harper County Emergency Management
Title VI Nondiscrimination Coordinator
115 E. Steadman St.
Anthony, KS 67003
Phone: (620) 842-6006
ccintron@harpercountyks.gov

Complaints may also be filed directly with the following agencies:

State of Kansas
Adjutant General's Department
Kansas Division of Emergency Management
Title VI Nondiscrimination Coordinator
2800 SW Topeka Blvd.
Topeka, KS 66611-1287
Phone: (785) 646-2204

US Department of Homeland Security
Office for Civil Rights and Civil Liberties
Compliance Branch
245 Murray Lane SW
Bldg. 410, Mail Stop 0190
Washington, DC 20528
Email: CRCLCompliance@hq.dhs.gov

What happens after a complaint is filed?

Title VI complaints must be investigated within sixty days. Investigating a complaint includes interviewing all parties involved and key witnesses. The investigator may also request relevant information such as books, records, electronic information, and other sources of information from all involved parties. You may specify if there is a particular individual or individuals that you feel should not investigate your complaint due to conflict of interest or other reasons.

In some cases, complaints will be forwarded to either the Kansas Adjutant General's Department (KDEM) or the US Department of Homeland Security/FEMA for investigation. If your complaint is forwarded to one of these agencies, you will be provided the name and contact information of the employee handling your complaint.

Federal law prohibits retaliation against individuals because they have filed a discrimination complaint or otherwise participated in a discrimination investigation. Any alleged retaliation should be reported in writing to the investigator.

IV. Title VI Complaint Form

Where did the discrimination occur?

Dates and times discrimination occurred?

Were there any other witnesses to the discrimination?

Name	Organization/Title	Work Telephone	Home Telephone

How would you like to see this situation resolved?

Have you filed your complaint, grievance, or lawsuit with any other agency or court?

Who _____ When _____
Status (pending, resolved, etc.) _____ Result, if known _____
Complaint number, if known _____

Do you have an attorney in this matter?

Name _____ Phone _____
Address _____ City _____ Zip _____

Signed _____ Date _____

V. Notice of Rights

Describe how your notice is disseminated to the public, whether the notice is provided in other languages, and provide a copy of the notice. A sample notice is provided below.

NOTICE OF NONDISCRIMINATION

Your Rights Against Discrimination under Title VI of the Civil Rights Act of 1964

Harper County Emergency Management

operates its programs and services without regard to race, color, national origin, sex, age, and disability.

- *Title VI of the Civil Rights Act of 1964*, which prohibits discrimination based on **race, color, or national origin** (including **limited English proficiency**).
- *Section 504 of the Rehabilitation Act of 1973*, which prohibits discrimination based on **disability**.
- *Title IX of the Education Amendments Act of 1972*, which prohibits discrimination based on **sex** in education programs or activities.
- *Age Discrimination Act of 1975*, which prohibits discrimination based on **age**.
- *U.S. Department of Homeland Security regulation 6 C.F.R. Part 19*, which prohibits discrimination based on **religion** in social service programs.

Anyone who believes they have been excluded from participation in, denied the benefits of, or otherwise subjected to discrimination under any Harper County Emergency Management program or activity because of their race, color, national origin, age, sex, or disability may file a discrimination complaint with Harper County Emergency Management.

To file a Title VI discrimination complaint, contact:

Title VI Nondiscrimination Coordinator

115 E. Steadman St.

Anthony, KS 67003

Phone: (620) 842-6006

ccintron@harpercountyks.gov