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# KNOX COUNTY TITLE VI MANAGEMENT POLICY

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KNOX COUNTY HUMAN RESOURCES  
400 Main St., Suite 345, Knoxville, TN 37902

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## KNOX COUNTY TITLE VI POLICY STATEMENT

Knox County assures that no person shall be excluded from participation in, denied the benefits of, or otherwise subjected to discrimination under any program or activity on the grounds of race, color, national origin or limited English proficiency as provided by Title VI of the Civil Rights Act of 1964, as amended and the Civil Rights Restoration Act of 1987.

In the event that Knox County distributes federal funds to another entity, Knox County will include Title VI language in all written agreements and will monitor for compliance.

The Title VI Compliance Coordinator for Knox County is responsible for initiating and monitoring Title VI activities, preparing required reports and other Knox County responsibilities required by any directives or regulations in the 23 Code of Federal Regulations. (CFR) 200 and 49 Code of Federal Regulations 21.

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Glenn Jacobs  
Knox County Mayor

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Date

## AUTHORITIES

Title VI of the Civil Rights Act of 1964, as amended, provides that no person in the United States shall, on the grounds of race, color, national origin or limited English proficiency be excluded from participation in, denied the benefits of, or otherwise subjected to discrimination under any program or activity receiving federal financial assistance.

The Civil Rights Restoration Act of 1987 broadened the scope of Title VI coverage by expanding the definition of the terms “programs or activities” to include all programs or activities of Federal Aid recipients, subrecipients, and contractors, whether such programs and activities are federally assisted or not.

*Additional Authorities and Citations Include:*

*Title VI of the Civil Rights Act of 1964, as amended 42 United States Code 2000 (d) to 2000.4; 42 United States Code 4601 to 4655; 23 United States Code 109(h); 23 United States Code 324; Executive Order 12250; Executive Order 12898; and 29 Code of Federal Regulations 50.3.*

### **Limited English Proficiency (LEP)**

Executive Order 13166 (August 11, 2000) requires all agencies that receive federal funding to provide services that are accessible to persons with limited English proficiency. Not providing services that are accessible constitutes discrimination based on national origin.

## TITLE VI ORGANIZATION AND RESPONSIBILITIES

The Knox County Mayor is responsible for ensuring the implementation of the County's Title VI Compliance Program. The County Mayor has assigned the duties and responsibilities of Title VI compliance to the Title VI Compliance Coordinator position. This position is responsible for ensuring compliance with Title VI and the day-to-day management of the Title VI program.

### **Title VI Compliance Coordinator Responsibilities**

The Title VI Compliance Coordinator is charged with the responsibility for monitoring and ensuring Knox County's compliance with Title VI regulations. Title VI responsibilities are as follows:

1. Ensure that all new employees acknowledge the Title VI policy.
2. Make available Title VI compliance training.
3. Ensure that procedures are in place for informing all service recipients of their rights under Title VI and how to file a discrimination complaint.
4. Ensure that Title VI posters and brochures (in English and other languages) are displayed and distributed throughout the agency.
5. Coordinate, facilitate, and monitor the complaint process for Knox County.
6. Submit the Title VI annual self-survey and other required documents in a timely manner as requested.
7. All other duties as necessary to ensure agency compliance with Title VI regulations.

### **Title VI Coordinator Designations**

In addition to the Title VI Compliance Coordinator, Knox County departments, agencies and special emphasis programs may designate a Title VI Coordinator. The Coordinators will be responsible for ensuring compliance, program monitoring, reporting, and education within their respective department/programs. Additional Coordinators will be determined as needed. The Title VI Compliance Coordinator may meet annually with all the Title VI Coordinators to discuss issues regarding program implementation and compliance monitoring within the County.

## DISCRIMINATORY PRACTICES

Knox County and its sub-recipients of federal funds will not:

- Deny an individual any service, opportunity, or other benefit for which such individual is otherwise qualified;
- Provide an individual with any service, or other benefit, which is inferior (in quantity or quality) to, or which is provided in a different manner from that which is provided to others;
- Subject an individual to segregated or disparate treatment in any manner related to such individuals; receipt of services or benefits;
- Restrict an individual in any way in the enjoyment of services, facilities or any other advantage, privilege or other benefit provided to others;
- Adopt or use methods of administration, which would limit participation by any group of recipients or subject any individual to discrimination;
- Address an individual in a manner that denotes inferiority because of race, color, national origin, age, sex, disability or religion;
- Permit discriminatory activity in a facility built in whole or in part with federal funds;
- Fail to advise the population eligible to be served or benefited by any federally funded programs that such programs exist;
- Deny any individual the opportunity to participate in the operations of a planning or advisory body that is an integral part of a federally funded program;
- Fail to provide services or information in a language other than English where significant numbers of potential or actual beneficiaries are of limited English-speaking ability;
- Subject an individual to discriminatory employment practices under any federally funded program whose objective is to provide employment; nor
- Locate a facility that would, in any way, limit or impede access to a federally funded service or benefit;

## COMPLAINT OF DISCRIMINATION PROCEDURES

### Acceptance of Complaint

Any individual alleging discrimination based on race, color, national origin or limited English proficiency due to an entity of Knox County who is noncompliant with the regulations outlined in (this policy) and/or ***Title VI of the Civil Rights Act of 1964, as amended***, has the right to file a complaint within 180 days of the alleged discriminatory act.

Said complaint shall be in writing, submitted through the [online portal](#) or sent to the Title VI Compliance Coordinator for Knox County. The office is located at 400 Main Street, Suite 345, Knoxville, TN 37902 and the telephone number is 865-215-4427.

The Title VI Compliance Coordinator (hereinafter referred to as Coordinator) will have primary responsibility for receipt, acknowledgement, acceptance, determine jurisdiction, investigation of complaints; reporting findings; recommending/implementing resolutions; and maintaining a complaint log.

### **The Complaint Process:**

1. All formal complaints shall be submitted, in writing, to the Coordinator using the [online portal](#) or by completing the HR Complaint Form, within 180 days of the alleged discriminatory event or practice. The Coordinator will conduct a preliminary review of the allegations contained in the complaint within 45 business days. During the preliminary review, the Coordinator will determine whether a potential violation has occurred, who has jurisdiction to investigate the complaint, and whether s/he has the necessary resources to conduct the investigation.
2. If the Coordinator determines an investigation is unwarranted, the coordinator will notify the complainant in writing, electronic or physical mail.
3. If the Coordinator determines a full investigation is warranted, the Coordinator will notify the complainant and all other interested parties in writing, electronic or physical mail. Such investigation will be completed within a reasonable time period, not to exceed 60 days.
  - a. Complainants will be expected to cooperate as interested parties during the investigation.
  - b. The investigation will include interviews with persons who may have knowledge concerning the allegation(s), including review of pertinent documents, records, policies, practices, procedures and other information necessary to render a fair and impartial determination.
  - c. When appropriate, the Coordinator will coordinate with other county, state or federal agencies to ensure accuracy or gather information.
4. If the determination supports cause to believe discrimination has occurred, the Coordinator will provide a summary of the investigation to the agency/department(s) who is named as the alleged discriminating official (ADO). The Coordinator will request a written response to the summary.
5. Once the ADO response is received, the Coordinator will add the response to the investigative report and make appropriate recommendations for resolving the complaint. The Coordinator will issue a letter to the complainant and the ADO, outlining the determination and an offer of mediation. If mediation fails, the Coordinator will effectively direct a fair and equitable resolution to the matter. This will be done in consultation with the Knox County Law Director.
6. The resolution will be provided to the complainant and the ADO, by electronic mail or certified letter (return receipt requested) indicating the terms and conditions of the resolution and how to file an appeal.

7. During the investigation, if the Coordinator determines that the complaint should be referred to the appropriate state or federal agency (because of the agency's expertise in reviewing this specific type of complaint), a notice by electronic or physical mail will be issued notifying the complainant that the complaint will be referred. It is not necessary for the Coordinator to disclose the identity of the complainant, so long as the information is sufficient to determine the identity of the recipient and indicates the possibility of a violation of Title VI.
8. At the complainant's discretion, the complaint can be filed externally with the federal agency or department, the state recipient, or the agency providing the service.

## TRAINING and DISSEMINATION

Title VI training will be made available online at [https://knoxcounty.org/hr/title\\_vi.php](https://knoxcounty.org/hr/title_vi.php) to all team members of each Knox County agency/department, contractors, sub-recipients, and special emphasis program area coordinators. Notice of Knox County's Title VI Policy and Regulations will be always provided online at [https://knoxcounty.org/hr/title\\_vi.php](https://knoxcounty.org/hr/title_vi.php). A portion of the policy will be made part of the employment handbook.