

Hilltoppers, Inc.

Subject: **Title VI Compliance**

Revised 3/11, 7/12, 3/16, 3/8/17

What is Title VI? Title VI of the 1964 Civil Rights Act states 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 benefit of, or be subjected to discrimination under any program or activity receiving federal financial assistance".

What does Title VI do?

- Prohibits entities for denying an individual any service, financial aid, or other benefit because of race, color or national origin
- Prohibits entities from providing a different service or benefit, or providing these in a different manner from those provided to others under the program
- Prohibits segregation or separate treatment in any manner related to receiving program services or benefits
- Prohibits entities from requiring different standards or conditions as prerequisites for serving individuals
- Encourages the participation of minorities as members of planning or advisory bodies for programs receiving federal funds
- Prohibits discriminatory activity in a facility built in whole or part with Federal funds
- Requires information and services to be provided in languages other than English when significant numbers of beneficiaries are of limited English speaking ability
- Requires entities to notify the respective population about applicable programs
- Prohibits locating facilities in any way that would limit or impede access to a Federally funded service or benefit
- Requires assurance of nondiscrimination in purchasing of services

Who must comply?

- State and local government: Agency distributing federal assistance or entity distributing federal assistance to the state or local government entity
- Higher education: college, university, or other post-secondary institution
- Local education agency or system of vocational education, or other school system
- An entire corporation, partnership, or other private organization, or an entire sole proprietorship
- The entire plant, or private corporation, or other organization which is a geographically separate facility to which federal assistance is extended

Policy:

The Employment Policies of Hilltoppers, Inc. shall adhere to the principles and procedures expressed in the CIVIL RIGHTS ACT of 1964 (Title VI). Prohibits discrimination based on race, color or national origin in programs or activities, which receive Federal Financial assistance.

Procedures:

1. Any potential employee applying for employment, or being employed by the agency, shall not be discriminated against because of race, color, or national origin.
2. Non-discrimination principles shall apply to: Hiring and termination practices; layoff and recall procedures; wages; job classifications or seniority; promotions or demotions; training or apprenticeship; exclusion from a union; union representation; segregated unions; referral by unions; qualifications and testing; advertising; benefits; segregated facilities; intimidation or reprisal.
3. Equal employment or equal opportunity employment shall be posted in a public place within the agency, and the agency has notified the State Employment Office that it is an equal opportunity employer.
4. The Equal Opportunity Employer policy of the agency shall be read, understood, and compliance assured by each employee noted by a signature.
5. Anyone who desires to file a complaint regarding Title VI violations or concerns can carry out the same steps detailed in the Grievance Policy and Procedures (steps 1 - 4).
6. Anyone receiving services through Hilltoppers, Inc. will be provided information about their right under the CIVIL RIGHTS ACT of 1964 (Title VI) upon their admission and then review yearly during the annual ISP meeting.
7. Anyone employed through Hilltoppers, Inc. will receive CIVIL RIGHTS ACT of 1964 (Title VI) training during the first 60 days of employment, and then each employee will complete an annual refresher.

Individuals who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English can be limited English proficient, or LEP. These individuals may be entitled language assistance with respect to a particular type or service, benefit, or encounter. Federal laws particularly applicable to language access include Title VI of the Civil Rights Act of 1964, and the Title VI regulations, prohibiting discrimination based on national origin. Many individual federal programs, states and localities also have provisions requiring language services for LEP individuals. Executive Order #13166 states that people who are LEP should have meaningful access to federally-conducted and federally-funded programs and activities.

See Policy: Limited English Proficiency, for more information.