

**City of Winston-Salem  
Human Relations Department**

**Title VI Compliance  
Limited English Proficiency (LEP) Policy and Procedures**

**I. Commitment Statement**

The City of Winston-Salem is committed to improving the accessibility of services to persons with Limited English Proficiency (LEP) and to developing and implementing a system that gives LEP persons “meaningful access” to the City of Winston-Salem’s programs and services. The City of Winston-Salem has adopted the goal of improving Hispanic Relations, as per the City Council’s Strategic Plan. As a result, the City of Winston-Salem has delegated authority for an LEP Compliance Coordinator (the Human Relations Director) within the Human Relations Department.

**II. Purpose**

This policy sets forth the basic requirements and procedures intended to ensure City of Winston-Salem government takes reasonable steps to consistently meet its legal obligation of language access requirements in compliance with Title VI and E.O. 13166.

**III. Background**

Congress enacted Title VI of the Civil Rights Act of 1964 to ensure federal money is not used to support discrimination on the basis of race or national origin in government activities. Section 601 states: “No person in the United States shall, on ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.” Neither Title VI, nor its implementing regulations discuss linguistic access per se; however, the courts have consistently found a close connection between national origin and language.

In 2000, the President signed Executive Order (E.O.) 13166 mandating all federal agencies and recipients of federal financial assistance take reasonable steps to ensure meaningful access to their programs to limited English proficient (LEP) individuals. These individuals may be entitled to language assistance with respect to a particular type of service, benefit, or encounter.

The City of Winston-Salem receives federal funding in support of programs, services, and activities through the following all departments receiving federal funding. The City also receives special federal grants or appropriations from time to time to undertake capital projects.

#### **IV. Definitions**

- A. *Limited English Proficiency (LEP) Person:*** An LEP individual is defined as someone who does not speak English as a primary language and has a limited ability to read, write, speak or understand English.
- B. *Federal Financial Assistance:*** Includes but is not limited to, grants and loans, grants or donation of federal property, the detail of federal personnel, the sale, lease or permission to use federal property at little or no cost, and any other federal agreement, arrangement, or other contract which has as one of its purposes the provision of assistance.
- C. *“Four Factor” Test:*** The US Department of Justice in 2002 issued LEP Guidance that articulated a starting point for achieving Title VI compliance. Affected City Departments should use the Four Factor test to determine the “reasonable steps” they should implement in order to be Title VI compliant. The four factors that should be balanced are:
- 1) **Proportion of the general public served** or likely to be encountered by the program or Department – The greater the number of LEP individuals, the more likely it is that language services are required.
  - 2) **Frequency of contact** with the general public dictates the level of contact and likelihood that language services are required.
  - 3) **Nature and importance of the program, activity or service** – The more important the program the greater the need for language services; i.e., Will denial or delay of service have serious or life-threatening consequences? Does government make the program compulsory?
  - 4) **Resource availability** will be dependent upon the size and budget of the Department which, in effect, will deem what is reasonable.
- D. *Title VI - Section 601 of the Civil Rights Act of 1964***  
No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

***E. Executive Order 13166 of the Civil Rights Act of 1964***

Federal agencies and recipients of federal financial assistance must take reasonable steps to ensure meaningful access to their programs to limited English proficient individuals who are five (5) percent of the total population or 1000 individuals, whichever is less.

***F. Who is Limited English Proficient or LEP?***

Persons who do not speak English as their primary language, who have a limited ability to read, write, speak, or understand English. These individuals may be entitled to language assistance under Title VI of the Civil Rights Act of 1964, with respect to a particular type of service, benefit, or encounter.

***G. “Reasonable Steps to Ensure Meaningful Access”***

The standard of “reasonable steps to ensure meaningful access” was designed by The US Department of Justice in 2002 to be a flexible, fact-dependent, starting point in an agency assessment of LEP persons eligible to be served or likely to be encountered by the program, the frequency of contact, nature or importance of the program, activity or service provided, and resources available.

The City of Winston-Salem had a population of approximately **224,000** according to Census 2000. Four and one-half percent (4.5%) of the population was Latino or Hispanic.

To date, City efforts, under the “reasonable steps” standard, have meant providing meaningful access to Spanish speaking LEP individuals. Such efforts include having multi-lingual translations for the City’s website, hiring multi-lingual employees, translating documents into Spanish, airing a Spanish city services-based television show, and offering pay incentives to employees who learn and/or use fluent Spanish during the normal course of their work duties.

***H. “Voluntary Compliance”***

The U.S. Department of Housing and Urban Development (HUD) has required that all agencies receiving federal funds to submit voluntary compliance plans consistent with expectations from the federal government. The City of Winston-Salem has met this requirement by

including the designation of a staff person to serve as agency specific LEP coordinator, specifically the Human Relations Department Director, to ensure rights and due process for LEP individuals.

## V. Procedures

**All City Departments that receive federal funding should have in place a written Limited English Proficiency (LEP) Plan based upon the “four factor” test.**

The elements of an LEP Plan are:

- a. Identifying LEP individuals who need language assistance
- b. Identifying ways in which language assistance will be provided
- c. Training staff
- d. Providing notice to LEP individuals
- e. Monitoring and updating the LEP Plan

Helpful websites to aid and assist in developing the written LEP include:

[www.lep.gov](http://www.lep.gov)

<http://www.usdoj.gov/crt/cor/>

<http://www.hhs.gov/ocr/index.html>

<http://www.hud.gov/offices/fheo/promotingfh/lep.cfm>

<http://epa.gov/civilrights/lepaccess.htm>

[http://www.usdoj.gov/crt/lep/guidance/guidance\\_index.html](http://www.usdoj.gov/crt/lep/guidance/guidance_index.html)

### A. LEP Guidance

Affected Departments, depending on budget restrictions and feasibility, are encouraged to explore a range of strategies to communicate with multi-lingual customers, such as identifying staff persons capable of serving as interpreters, contracting with outside interpreters, using telephonic interpreter services (i.e., AT & T Language Line), and/or engaging community volunteers. Interpreting is a complex task and requires skills different from those needed for translation. Caution and consideration should guide the use of informal interpreters due to concerns regarding competence, confidentiality, and conflicts of interest.

Affected Departments are encouraged to explore a range of strategies to provide for written language assistance or the translation of vital documents, including providing “on-site” interpretations of vital documents or brainstorming suitable alternatives to written documents. A document is considered vital if it contains information that is critical for obtaining federal services, benefits, or is required by law.

## **B. LEP Resources Available**

The LEP Compliance Coordinator (Human Relations Director) in the Human Relations Department is responsible for examining all City services, providing outreach to the growing LEP community, and interfacing with all City Departments to help ensure meaningful access to LEP clients and customers. The LEP Compliance Coordinator is able to assist and support Departmental staff in assessing their specific needs and preparing a draft LEP document. The LEP Compliance Coordinator performs the role of resource and advocate for effective plan development.

The LEP Compliance Coordinator also coordinates the Spanish Language Assessment Tool used by hiring Departments in conjunction with normal Human Resources processes to evaluate the Spanish language proficiencies of prospective employees whose jobs may require or prefer bi-lingual abilities, or current employees who may be called upon by the Department to assist their Spanish-speaking customers or clients.

The LEP Compliance Coordinator *is not* unilaterally responsible for directly providing translation or interpretation services to City Departments. The LEP Compliance Coordinator *is* responsible for identifying and maintaining a network of qualified community resources for referral to City Departments.

Human Resources can provide guidance and support in the recruitment, retention and professional development of bi-lingual staff (staff fluent in two languages) or staff with specific skills (certifications, credentials) in translation/interpretation assistance.

## **C. LEP Enforcement**

While planning is an important part of ensuring that reasonable steps are being taken to provide meaningful access to LEP individuals seeking services, benefits, or information, there is no blanket requirement that the plans themselves be submitted to federal agencies providing federal financial assistance. In certain circumstances, such as in complaint investigations or compliance reviews, recipients may be required to provide to federal agencies a copy of any plan created by the recipient.

Most federal agencies have an office that is responsible for enforcing Title VI of the Civil Rights Act. The Coordination and Review Section (COR) of the Civil Rights Division of the Department of Justice has taken the lead in coordinating enforcement.

**D. City Services and Public Signage**

The Neighborhood Services Department contracted for a Hispanic Community Survey to be conducted in 2008 that would assess how City services are perceived and utilized by Hispanic residents. This report also identified gaps in service for those with a language barrier. Recommendations included developing consistent design standards and contracting for expert translation services. The Report has been provided to Neighborhood Services and Human Relations. The results of the survey will assist in the responsibility for on-going improvements in the elimination of language barriers as the City continues to construct or renovate new facilities. Technical support and assistance to the Department is available through the Human Relations Department. Also, while not specifically addressed within Title VI legislation, the City of Winston-Salem may choose to utilize signage that is written in Spanish, as needed.

**E. City Web Pages**

Again while not specifically addressed within Title VI legislation, the City of Winston-Salem, through its Information Systems and Marketing and Communications Departments, should assume responsibility for review of its official internet presence and how critical information on essential services for Spanish speakers, and future target languages, can be provided in a creative, concise, cost-effective manner on the web. Technical support and assistance to the Department is available through the Human Relations Department.

**F. LEP Critical Services**

**The following LEP Critical Services City Departments** fall under the “reasonable steps to ensure meaningful access” standard based on the receipt of federal funding and/or their significant interaction with the general public:

1. Emergency Services
2. Police
3. Fire
4. Inspections
5. Utilities
6. Human Relations
7. Housing Neighborhood Development
8. Neighborhood Services
9. Economic Development
10. City Link

11. Marketing and Communications
12. Winston-Salem Transit Authority
13. Department of Transportation
14. Stormwater
15. Streets
16. Vegetation Management
17. Recreation and Parks
18. Information Systems
19. Planning

All City departments, with technical assistance and support from Human Relations, are required to be conscious as circumstances change to continue and evaluate potential barriers to programs and services.

Under Title VI, **any** City department that receives grants and loans from the federal government should have in place a written plan for identifying LEP individuals and including language assistance measures.

#### **G. LEP Policy Goals**

1. Oral Information (Language Assistance)
2. Written Information (Translation of Vital Written Materials)
3. Electronic Information (Web Pages)
4. Signage (Within Publicly Accessible Buildings maintained/Administered)
5. Staff Training
6. Outreach

#### **VI. Evaluating City performance under the LEP Policy Goals**

- A. Contact the LEP Critical Services departments regarding their oral/written translation capabilities.
- B. Review foreign language translations on the City website (IS Department, Marketing and Communications Department).
- C. Conduct a field audit of bi-lingual building signage, as needed.
- D. Review current practices and explore new measures in staff training and outreach.
- E. Utilize the comprehensive Hispanic Community Survey results of how Hispanic residents view City services.

## **VII. Policy and Plan Implementation Recommendations**

- A. Continue offering participating employees increased options for skills improvement, tuition reimbursement, or incentive pay based on their Spanish language skills. (Human Relations; Human Resources)
- B. List expert, professional contractors or trainers available to provide Spanish language translation and interpretation services on the City intranet site. (IS; Human Relations)
- C. Provide department directors with mandatory Title VI Training beginning in FY 2009-2010. (City Attorney's Office, Human Resources)
- D. Incorporate an LEP overview into management/supervisory training for departments receiving federal funds. (City Attorney's Office, Human Resources)
- E. Re-evaluate bi-lingual or multi-lingual hiring policy and related recruitment incentives as part of the overall update of the Personnel Ordinance. (Human Resources)
- F. Clarify individual City departmental responsibilities versus those of Human Relations under Title VI, Executive Order 13166.
  - 1. Each federal grant recipient expected to have an LEP plan.
  - 2. Human Relations LEP Compliance Coordinator serves as a resource/advocate for plan development.
- G. Use the Spanish Language Resource Liaison (Human Relations Specialist) in assessing barriers to language interpretation and understanding for users of City services.
- H. Use telephonic translation and/or bi-lingual employees as an asset to City Link.
- I. Encourage the Critical Service departments to utilize their state or national affiliates as resources to present and provide appropriate document translations as needs arise.
- J. Complete a review of the City website to ensure the effectiveness of Spanish translation.
- K. Use bi-lingual signage on display at various work sites, as needed.

- L. Use results of the Hispanic Community Survey of how Hispanic residents view City services and use findings to increase understanding and motivate improvements. Continue to draw upon the survey to better develop outreach, communications, and city services. (City Departments)
  
- M. Although Title VI and E.O. 13166 specifically obligate only those City Departments that directly receive federal funding, the fundamental philosophy and practice of the City of Winston-Salem is that **all City Departments** should strive to take reasonable steps to ensure meaningful access to their programs, activities, and services by LEP individuals.

## **Outline of LEP Grievance Process**

- I. Intake
  - A. Jurisdiction and Standing
    - 1. City Code
    - 2. Federal Laws
    - 3. Mediation
  - B. Complaint Form
    - 1. Required Information
    - 2. Required Signatures
  - C. Record Keeping/Filing
    - 1. Case Tracking System
    - 2. Storage and Files
- II. Notification
  - A. Content of Notification Letter
  - B. Time Frames/Deadlines
- III. Processing
  - A. Documentation
    - 1. Contract Agreements
    - 2. Photographs
    - 3. Public Information
      - a. Police Reports
      - b. Tax Records
    - 4. Releases/Consent Forms
  - B. Interviews
    - 1. Identifying Witnesses
    - 2. Witness Statements
  - C. Investigation Timeline
    - 1. 45-Day Turnaround
    - 2. Exception to 45-Day Turnaround
- IV. Final Determination and Case Closure
  - A. Findings of Fact
  - B. Mediation Agreements
  - C. Recommendation from the Director
  - D. Final Determination Notification from the City Manager
  - E. Case Closure Form
- V. Levels of Appeal
  - A. City Manager

B. Attorney

**LEP Grievance Process**

**The following policy reflects the LEP grievance process procedures for complaints filed with the Human Relations Department:**

## I. Intake

### A. Jurisdiction and Standing

A Limited English Proficiency complaint is a complaint that is based on a citizen's right reasonable access to city-related services, grants, donations, properties, or programs that are funded in whole or in part by federal funding. The Human Relations Department is authorized to advise complainants regarding their rights and to investigate complaints based on a violation of reasonable access. It is the responsibility of the Human Relations Department to consult with potential complainants via telephone or in person regarding such complaints.

#### 1. Jurisdictional Basis under the Winston-Salem City Code

The Human Relations Department will determine the jurisdiction of the complainant's concerns by assessing whether the concerns fall within the realm of the Winston-Salem City Code. The Human Relations Department has the jurisdiction to assist complainants regarding the following limited English proficiency issues:

- a. A Limited English Proficiency (LEP) Person* is defined as someone who does not speak English as a primary language and has a limited ability to read, write, speak or understand English.
- b. Federal Financial Assistance* includes but is not limited to, grants and loans, grants or donation of federal property, the detail of federal personnel, the sale, lease or permission to use federal property at little or no cost, and any other federal agreement, arrangement, or other contract which has as one of its purposes the provision of assistance.
- c. The "Four Factor" Test*, as issued by the US Department of Justice in 2002, articulated a starting point for achieving Title VI compliance and is adopted by the City of Winston-Salem. Affected City Departments should use the Four Factor test to determine the "reasonable steps" they should implement in order to be Title VI compliant. The four factors that should be balanced are:
  - i. Proportion of the general public served* or likely to be encountered by the program or Department – The greater the number of LEP individuals, the more likely it is that language services are required.

- ii. **Frequency of contact** with the general public dictates the level of contact and likelihood that language services are required.
- iii. **Nature and importance of the program, activity or service** will be determined by the importance of the program in relationship to the need for language services.
- iv. **Resource availability** will be dependent upon the size and budget of the Department which, in effect, will deem what is reasonable.

2. Federal Laws

*a. Title VI - Section 601 of the Civil Rights Act of 1964*

No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

*b. Executive Order 13166 of the Civil Rights Act of 1964*

Federal agencies and recipients of federal financial assistance must take reasonable steps to ensure meaningful access to their programs to limited English proficient individuals who are five (5) percent of the total population or 1000 individuals, whichever is less.

3. Mediation

Based on the delegating authority of the Human Relations Director, a Human Relations Specialist (also, “Specialist”) will advise the complainant and respondent of his/her option to mediate the complaint. The mediation will remain available to the parties throughout the investigative process.

The Human Relations Specialist will implement mediation only after both the complainant and respondent have agreed to it. Such an agreement must be in writing and signed by both parties (see the attached template for Mediation Agreements).

The Mediation Agreement will set forth the terms and conditions of any and all mediation sessions that will be entered into by the parties. The Human Relations Specialist will preside over the mediation sessions and set the rules of protocol. Each party will be allowed to speak, uninterrupted, while the other party listens. Afterwards, the Specialist will ask the opposite party to repeat the key points the other party made. Then, the Specialist will communicate the key points made by both parties. The Specialist will then encourage resolution by asking for proposed solutions from both parties and negotiating the proposals until a final resolution is achieved. Once a final resolution is achieved, the Specialist will note the proposals and record them in a Conciliation Agreement. If mediation fails, landlords and/or tenants may pursue legal action through court or a private attorney. Both parties may refuse to mediate at anytime during the mediation process.

B. Complaint Form

The LEP Complaint Form (see the attached LEP Complaint Form) will be completed by the complainant. It is not the practice of the Department to process anonymous complaints. The complainant must write the exact basis for filing the complaint. The complaint must be filed within one year of the allegation. The complaint must also write the dates, locations, and witnesses for all issues noted in the complaint. The complainant must also write the remedy that is sought as a result of filing the complaint. A copy of the complaint form will be made available to the respondent, upon request, and any other city administrators/officials who have a legitimate need to know. Otherwise, the Human Relations Department will deem the complaint form and other information. The LEP Complaint Form must include the notarized signature of the complainant.

1) Case Tracking System

The Human Relations Department will track all LEP complaints through an internal tracking system. This system will be maintained by the Human Relations Administrative Secretary. The Administrative Secretary will generate a report that reflects all LEP Complaints. This report will be shared with the City Manager's Office and the City Attorney's Office, as needed.

2) Storage and Files

All documents pertaining to an LEP complaint will be put into a complaint file created by the Human Relations Specialist or Human Relations Administrative Secretary. Files will be organized and stored based on the fiscal year in which the LEP complaint was filed.

## II. Notification

### A. Content of Notification Letter

The Human Relations Director will mail each complainant and respondent a notification letter regarding the filing of the LEP complaint. The Human Relations Administrative Secretary will mail the notification letter by certified mail, return receipt requested.

At a minimum, the content of the notification letter will include:

1. the name of the complainant;
2. the name of the respondent;
3. the date the complaint was filed;
- 2) the basis of the complaint;
- 3) the name of the Human Relations Specialist assigned to investigate the complaint;
- 4) any deadlines within which the parties have to respond;
7. the availability of mediation as a means for resolution;
8. any appeal rights available to both parties; and
- 9) contact information for the Human Relations Specialist.

### B. Time Frames/Deadlines

#### 1) Deadlines for Parties' Responses

The complainant and respondent will have five (5) business days within which to respond to any requests for information or requests for interviews. Failure of the complainant or respondent to respond within this prescribed time will result in the possible closure of the complaint. Any requests for extensions of this five (5) day response time must be made to the Human Relations Specialist via writing or telephone call within the first five (5) day response time. The Specialist will confer with the party requesting the extension to determine a reasonable extended date. The Specialist will convey the request for extension to the opposite party in writing within three (3) days of the agreed upon extended date.

## III. Processing

### A. Documentation

The Human Relations Department will seek to gather documentation pertaining to the complaint in order to identify, request, retrieve, and collect all relevant, factual evidence pertaining to the filed complaint.

1) Contract Agreements

The Human Relations Specialist will request a copy of the written contract or other binding agreement immediately upon receiving the written LEP complaint form from the complainant. The Specialist will examine the agreement to assess the terms and conditions of the agreement as well as other pertinent information.

2) Photographs

The Human Relations Specialist may deem it necessary to take photographs of objects or areas that are relevant over the course of the investigation. These photographs may be used by the Specialist to analyze the credibility of asserted evidence.

3) Public Information

During the discovery process, the Human Relations Specialist will retrieve copies of relevant documents that are available, as per the NCGS § 132 (the Public Records Law), the Federal Freedom of Information Act, and/or other venues of public record. Such information may include, but will not be limited to criminal and civil records, sex offender records, inspection records, police reports, and tax records. The Human Relations Specialist may obtain this information by requesting it from the respective agencies or by accessing the information on the Internet.

4) Releases/Consent Forms

The complainant or respondent may sign a waiver that will authorize the Human Relations Specialist to obtain information that is only available upon the consent of the complainant or respondent. The complainant or respondent may also sign a release or consent form that would authorize the Human Relations Specialist to access medical information that the complainant or respondent deems necessary for a thorough investigation. Such waivers, consent forms, or releases must be witnessed by a Human Relations staff member in addition to the investigating Human Relations Specialist. The complainant, witness, and authorizing party will sign and date the waiver, consent form, or release in order for it to be deemed fully executed.

B. Interviews

The Human Relations Specialist will advise all interested parties that the investigation, including information shared and investigation

questions/answers, should be treated confidentially in order to maintain the integrity and credibility of the investigation.

1) Identifying Witnesses

The Human Relations Specialist, with the assistance of the complainant and respondent, shall identify witnesses who have information relevant to the filed complaint. The Specialist will compile the list of witnesses and contact each one, via written letter or telephone, for an interview. Upon interviewing the witnesses, the Specialist will make the witnesses aware of the nature of the complaint and the names of the complainant and respondent, unless it has been communicated by the complainant or respondent that his or her safety and welfare will be at risk.

2) Witness Statements

The Human Relations Specialist will prepare a list of witness questions. The Human Relations Specialist will confer with the Human Relations Director to ensure that the questions will be unbiased and will not lead the witness in his or her answers to the questions. The Human Relations Specialist will advise the witness that the questions and answers are confidential and should not be shared with anyone during the course of the investigation. The complainant and respondent are not privy to knowing the exact questions and answers posed to the witnesses. Documented responses from each witness will be treated as confidential information.

C. Investigation Timeline

1) 45-Day Turnaround

The Human Relations Specialist will advise the complainant and respondent that he will make every reasonable effort to ensure that the housing complaint investigation is completed and closed within 45 (forty-five) business days from the original complaint filing date.

2) Exception to the 45-Day Turnaround

In the event that the investigation takes longer than 45 (forty-five) business days, the Specialist will advise the complainant and respondent as to the reasons for the delay and the approximate date it will be completed. If the complainant or respondent objects to the extended deadline, he or she must notify the Human Relations Director

in writing within five (5) business days after receiving the notice from the Human Relations Specialist.

#### IV. Final Determination and Case Closure

##### A. Findings of Fact

The Human Relations Specialist will prepare a final report in which he analyzes the unbiased findings of fact as they pertain to the housing complaint. The report will include the complaint form, discovery items, witness statements, and other relevant documentation. This report will be submitted to the Human Relations Director for final review and determination.

##### B. Mediation Agreements

The Conciliation Agreement (see attached Mediation Agreement template) will set forth the terms and conditions of the actual mediation sessions. Both parties will sign and date the Mediation Agreement. Afterwards, the Specialist and the Human Relations Director will sign and date the Mediation Agreement. A copy of the fully-executed Mediation Agreement will be shared with the complainant and respondent. The Specialist will also retain a copy for the Commission's files. Once all interested parties have signed the Mediation Agreement, it will be deemed fully executed and the case file will be closed.

##### C. Recommendation from the Director

At the conclusion of the Final Report, the Human Relations Specialist will recommend to the Human Relations Director an unbiased, neutral investigative assessment based on the facts collected during the investigation. The Human Relations Director will independently assess the evidence and facts reported in the final report. The Director will advise the Specialist if there are areas in the investigation that need further examination or analysis. The Director will also consider the credibility and objectivity of the evidence gathered and witnesses interviewed in making the final determination. The final determination will be based on the Winston-Salem City Code and other relevant laws and ordinances.

##### D. Final Determination Notification from the Director

The final determination and the basis of the determination will be articulated in a determination letter from the Director to the complainant and respondent. The notification letter will also include any appeal rights

available to the parties. The Director's determination letter will represent the final decision on behalf of the Human Relations Department.

E. Case Closure Form

Upon the acceptance of the final investigation report by the Director and the Director's letter of determination to the parties, the case will be deemed closed by the Human Relations Commission. The Human Relations Specialist will complete a case closure form that will become a part of the housing complaint file. The form will indicate the basis of the complaint, how the complaint was resolved, and the dates that notification letters were mailed. The form will be signed and dated by the Specialist and the Director.

V. Levels of Appeal

A. City Manager's Office

If the complainant or respondent wishes to appeal the final decision made by the Human Relations Director, he or she may file such an appeal with the City Manager. If the complainant or respondent wishes to appeal the final decision of the City Manager, he or she may consult with a private attorney for further review and/or investigation.

***This policy shall be reviewed and updated as needed by the City Manager and City Attorney.***