

Washington County Title VI Plan

July 2025

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1. Introduction and Purpose

The Washington County Title VI Plan (the Plan) documents Washington County's roles, responsibilities, and procedures under Title VI of the Civil Rights Act of 1964 (as amended), which provides that: "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."

As a recipient of federal financial assistance, Washington County affirms its responsibility to provide fair and equitable access to county public services, activities, and programs regardless of race, color, or national origin. Further, Washington County is committed to ensuring access to residents with limited abilities to speak, write, or understand English.

While there are other laws, regulations, and policies that govern non-discrimination across other factors, this Plan only addresses race, color, and national origin under direction of Title VI.

2. Policy, Authorities, and Citations

2.1. Washington County Title VI Policy

The Washington County Board adopted Policy #5006 – Title VI of the Civil Rights Act of 1964 on May 13, 2025 (Attachment A).

2.2. Authorities

Title VI of the 1964 Civil Rights Act provides 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 benefits of, or be otherwise subjected to discrimination under any program or activity receiving federal financial assistance. "Authorities" are citations of all relevant federal statutes, regulations, executive orders, and other laws/requirements that guide Washington County's Title VI program.

The Civil Rights Restoration Act of 1987 expanded the definition of "programs or activities" under Title VI to include all programs or activities of federal aid recipients, subrecipients, and contractors, whether such programs and activities are federally assisted or not (Public Law 100- 259 [S. 557] March 22, 1988). Further, [28 CFR § 42.102\(d\)](#) states that "program or activity...mean[s] all of the operations of any entity...any part of which is extended Federal financial assistance...."

The Federal Highway Administration (FHWA) [elaborates on this Title VI guidance](#), stating that if a department within a government receives federal assistance, all operations of that department are subject to Title VI, but not necessarily all operations of the government as a whole. Additionally, the FHWA's guidance clarifies that all operations of subrecipients are also within the scope of Title VI, including actions by private firms under contract with a recipient of federal assistance.

In accordance with these definitions, Title VI is interpreted here to apply to the entirety of the operation and administration of Washington County departments that receive and disburse federal funds. Likewise, as Washington County is a recipient of federal funds and distributes federal funds to subrecipients, Title VI applies to actions taken by subrecipients, including private firms under contract with Washington County when federal funds are used. For Washington County departments that do not receive federal financial assistance for their administration or operation, Title VI does not apply.

2.2.1. Prohibited Discrimination

Prohibited discrimination may be intentional or unintentional. Seemingly neutral acts that have disparate impact(s) 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, or national origin include:

- Denial of public services, financial aid, or other public benefits (programs or activities) to an individual or group of people;
- 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; and,
- Discrimination in employment.

2.2.2. Legislative Citations

Washington County's Title VI compliance program is governed by many legal authorities, including, but not limited to, the list below.

- Title VI of the Civil Rights Act of 1964 (Public L. No. 88-352), as amended, 42 USC § 2000d, et seq.
- Civil Rights Restoration Act of 1987 (Public L. No. 100-259, 102 Stat. 28 (1988), also found at 42 USC § 2000d, et seq.)
- 42 USC §§ 4601 to 4655
- 23 USC § 109(h)
- Executive Order 12250
- Executive Order 12898
- Executive Order 13166
- 23 CFR § 200
- 28 CFR § 50.3
- 49 CFR § 21

2.3. Other County Non-Discrimination Plans and Programs

Two departments within Washington County, Community Services and Public Works, are frequent recipients of federal funds for a variety of programs or services, or funds may be passed-through these departments to municipalities within Washington County. Given the nature of their work and the unique monitoring and reporting requirements sometimes associated with federal funds, these departments have established their own specific plans that address Title VI.

The discussion of these plans below is solely for reference. These plans may address other civil rights or non-discrimination matters unrelated to Title VI but do so in accordance with other state or federal requirements related to the programs, activities, or services of the respective department.

2.3.1. Washington County Community Services Department

As a recipient of federal financial assistance, Washington County Community Services is responsible for providing core services to support the most vulnerable individuals and families. Washington County's Community Services Department has a Comprehensive Civil Rights Plan to ensure that all eligible individuals receive equal access to program services and information. This plan is available [online](#).

The Community Services Department’s Comprehensive Civil Rights Plan covers the Minnesota Human Rights Act in addition to Title VI and other civil rights laws, while the Washington County Title VI Plan and program addresses the entire county organization’s approach to Title VI of the Civil Rights Act of 1964 (as amended).

2.3.2. Washington County Public Works Department

The United States Department of Transportation (USDOT), Federal Highway Administration (FHWA), and Minnesota Department of Transportation (MnDOT) require recipients of federal funds to prepare a department-specific plan to clarify roles, responsibilities, and procedures in place to ensure compliance with Title VI. Washington County’s Public Works Department has a Title VI Plan that addresses these specific Title VI reporting requirements and applies to all operations of Public Works related to transportation, including its contractors and anyone who acts on its behalf. This plan is available [online](#).

In addition to assuring non-discrimination on the grounds of race, color, and national origin, the Federal Aid Highway Act of 1973 prevents discrimination on the basis of sex (23 USC § 324). For activities of the Washington County Public Works Department that are not responding to specific USDOT requirements, any issues relating to discrimination on the grounds of race, color, or national origin will be within the scope of the Washington County Title VI Plan.

3. Roles and Responsibilities

The Washington County Administrator 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 Washington County employees, contractors, and agents pursuant to 49 CFR § 21.

Ensuring non-discrimination in the delivery of services and programs offered by Washington County is a shared philosophy and responsibility of all Washington County staff members and those working on behalf of the county (i.e., subrecipients, contractors, and agents). This section discusses the organizational structure of the Title VI Plan and the roles and responsibilities of key staff who will work to fulfill the mission of ensuring non-discrimination and inclusivity in the conduct of county business.

3.1. Washington County Organizational Chart for Title VI Reporting Relationships

A copy of Washington County’s [countywide organizational chart](#) may be obtained online. In this document, however, the organizational chart shown to the right is provided strictly as it relates to the Title VI Plan.

3.2. Title VI Coordinator and Duties

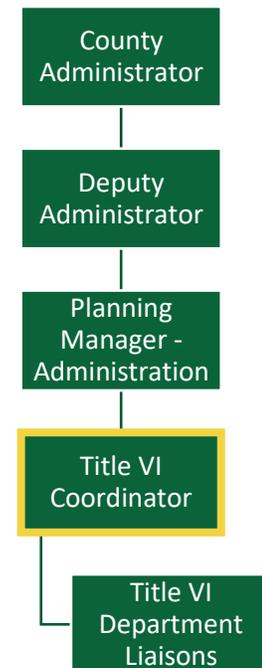
The Washington County Administrator has designated a Title VI Coordinator who is responsible for initiating, monitoring, and ensuring Washington County’s compliance with Title VI requirements for its departments and services.

Title VI Coordinator

Washington County Office of Administration
14949 62nd Street North, Stillwater, MN 55082
AskTitleVI@WashingtonCountyMN.gov

The Title VI Coordinator’s responsibilities include but are not limited to the following:

1. Coordinate the overall administration of the Title VI program.
 - a. Implement the plan, programs, and procedures.
 - b. Update the plan, programs, and procedures, as needed.
2. Conduct ongoing Title VI monitoring.
 - a. Develop procedures for data collection and analysis of Washington County demographics.
 - b. Compile reports from Washington County departments.
3. Facilitate staff trainings, as needed.
4. Coordinate with regional and state agencies as needed for Title VI compliance.
5. Coordinate Washington County’s Title VI complaint process with the County Risk Manager.
6. Communicate on Title VI Plan activities with the Washington County Administrator and Board, as needed.
 - a. Develop an Annual Report highlighting efforts undertaken over the past Fiscal Year related to Title VI.



4. Title VI Inquiries and Complaints

Every individual has the right to equal access to services, whether they are an applicant, client, or member of the public. Individuals have a right to file civil rights complaints if they believe that they or an individual they care for has been discriminated against because of their race, color, or national origin.

It is against the law for anyone who works for Washington County to retaliate against a person who files a complaint or who cooperates in the investigation of a Title VI complaint.

4.1. How to File Title VI Complaints

Title VI complaints are first filed with the county Risk Manager, who will collaborate with the Title VI Coordinator on next steps. If individuals believe that they have been discriminated against by someone

working for Washington County, they can file a complaint by completing and returning the Washington County Title VI Discrimination Complaint Form (Attachment B) to:

Risk Manager

Washington County Department of Human Resources
14949 62nd Street North, Stillwater, MN 55082
TitleVIComplaint@WashingtonCountyMN.gov

If Complainants need assistance to file a complaint or need interpretation services, they may contact the Title VI Coordinator. Reasonable efforts will be made to assist people with disabilities, limited English proficiency, and others unable to file a written complaint.

Once a review of the complaint has been completed, a letter of determination will be issued to the Complainant and appropriate Washington County staff.

4.1.1. Additional Ways to File a Complaint

Alternatively, Complainants may file complaints with the State of Minnesota, the United States Department of Justice, or the applicable federal agency directly, in which case the complaint would be investigated by those entities.

U.S. Department of Justice

Civil Rights Division
950 Pennsylvania Ave. NW
Washington, D.C. 20530
888-848-5306 (toll free)

Minnesota Department of Human Rights

Freeman Building, 625 North Robert St.
Saint Paul, MN 55155
651-539-1100 (voice)
800-657-3704 (toll free)
711 or 800-627-3529 (MN Relay)

4.2. Arrangements for People with Disabilities

Washington County will make appropriate arrangements to ensure that people with disabilities are provided with reasonable accommodations and modifications to the above procedures, if needed, to participate in the complaint process. Complainants may contact Washington County’s ADA Coordinator/Risk Manager:

Risk Manager

Washington County Department of Human Resources
14949 62nd Street North, Stillwater, MN 55082
TitleVIComplaint@WashingtonCountyMN.gov

5. Limited English Proficiency Plan

Disproportionate effects on persons with limited English proficiency (LEP) have been held to constitute national-origin discrimination under Title VI. Washington County acknowledges its responsibility to reduce LEP as a barrier for individuals in county programs and activities and has developed a Limited English Proficiency (LEP) Plan to provide guidance across the organization on how and when to provide appropriate language services. Each county department should reference the LEP Plan to consider how they can best ensure compliance with Title VI and reduce language barriers in their own programs and activities.

6. Title VI Plan Administration

The administration of the Washington County Title VI Plan will include the following:

1. Post a copy of this Title VI Plan on the first floor of the Washington County Government Center where members of the public can review it.
2. Post the Title VI Plan on Washington County's public website at <https://www.washingtoncountymn.gov>.
3. Review the Title VI Plan with appropriate staff at regular intervals, in compliance with federal guidance and regulations.
4. Annually track the number of Title VI complaints received and reviewed and provide appropriate information on the resolution of the complaint or its status.
5. Produce an Annual Report that details the activities undertaken during the prior Fiscal Year to help further advance the achievement of Title VI in the programs, services, and activities of Washington County.

ATTACHMENT A: Title VI Policy



*Administration
Policy # 5006*

Title VI of the Civil Rights Act of 1964

Purpose

This policy ensures compliance with Title VI of the Civil Rights Act of 1964, which prohibits discrimination on the basis of race, color, and national origin in any program or service that receives federal funding.

Policy

No person shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program, activity, or operation of Washington County as provided by Title VI of the Civil Rights Act of 1964 and related statutes.

While Title VI compliance is a condition of receipt of federal funds, Washington County will make every effort to ensure non-discrimination in all its programs and activities, whether those programs and activities are federally funded or not.

Guidelines

This policy applies to all programs, activities, services, and operations of Washington County, including its subrecipients, contractors/consultants and agents who work on behalf of Washington County.

In the event Washington County distributes federal-aid funds to another entity or awards contracts, Washington County will include Title VI language in all written agreements and will monitor for compliance.

A Title VI plan to ensure compliance will be developed and maintained by county staff and be made available to the public to communicate their right to non-discrimination in Washington County programs and services and the ways they might submit a complaint should they feel the county has not complied with Title VI.

Responsibility

The Washington County Administrator will designate a Title VI Coordinator responsible for initiating, monitoring, and ensuring Washington County's compliance with Title VI requirements for its departments and services.

Source

Title VI of the Civil Rights Act of 1964 ([Public L. No. 88-352](#)), as amended, 42 USC § 2000d, et seq.

Legal Authorities

1. Title VI of the Civil Rights Act of 1964 ([Public L. No. 88-352](#)), as amended, 42 USC § 2000d, et seq.
2. Civil Rights Restoration Act of 1987 ([Public L. No. 100-259](#), 102 Stat. 28 (1988), also found at 42 USC § 2000d, et seq.)
3. [42 USC §§ 4601 to 4655](#)
4. [23 USC § 109\(h\)](#)
5. [Executive Order 12250](#)
6. [Executive Order 12898](#)
7. [Executive Order 13166](#)
8. [23 CFR § 200](#)
9. [28 CFR § 50.3](#)
10. [49 CFR § 21](#)

ATTACHMENT B: Title VI Complaint Form

Washington County assures that no person shall be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity on the grounds of race, color, national origin, or limited English proficiency (LEP) as provided by Title VI of the Civil Rights Act of 1964, and the Civil Rights Restoration Act of 1987 (P.L. 100-259).

Any person(s) or organization(s) who believe that they have been the object of unequal treatment or discrimination related to the receipt of benefits and/or services rendered by Washington County based on their race, color, or national origin may file a written complaint of discrimination with Washington County.

Instructions for Filing Title VI Complaints:

If you believe your rights have been violated on the basis of race, color, or national origin, please complete the attached Discrimination Complaint Form. Assistance is available upon request to help you complete this form, including translation and/or interpretation services. After completing the form, please mail, email, or deliver it to:

Risk Manager

Washington County Department of Human Resources
14949 62nd Street North Stillwater, MN 55082
TitleVIComplaint@WashingtonCountyMN.gov

You do not need an attorney to file this complaint. However, you may wish to seek legal advice regarding your rights under the law.

If the information specified above or elsewhere in this form is needed in another language, please contact AskTitleVI@washingtoncountymn.gov.

Si se necesita información en otro idioma, póngase en contacto con AskTitleVI@washingtoncountymn.gov.

Yog tias cov lus qhia uas yuav tsum tau nyob rau hauv lwm yam lus, ces hu mus rau AskTitleVI@washingtoncountymn.gov.

如果信息是需要另一种语言, 然后致电 AskTitleVI@washingtoncountymn.gov.

Additional information on Washington County's Title VI program, including Notice to the Public, information about Washington County's Title VI, and the complaint review procedure are posted on the county's website.

Additional Ways to File a Complaint

Alternatively, Complainants may file complaints with the State of Minnesota, the United States Department of Justice, or the applicable federal agency directly, in which case the complaint would be investigated by those entities.

U.S. Department of Justice
Civil Rights Division
950 Pennsylvania Ave. NW
Washington, D.C. 20530
888-848-5306 (toll free)

Minnesota Department of Human Rights
Freeman Building, 625 North Robert St.
Saint Paul, MN 55155
651-539-1100 (voice)
800-657-3704 (toll free)
711 or 800-627-3529 (MN Relay)

Additional Notices

To be accepted, a discrimination complaint must:

- a. Involve discrimination on the basis of race, color, or national origin;
- b. Allege that the discrimination was committed by the County, a County employee or a sub-recipient/contractor of the County; and
- c. Be filed within 180 days of the alleged discrimination or within 180 days of when the complainant knew, or should have known, of it.

To allow for a full investigation of a complaint, the following information is required:

- a. The name, address and phone number of the person who experienced the discriminatory action;
- b. The date of the alleged act of discrimination or the date when the complainant(s) became aware of the alleged discrimination;
- c. A brief but specific description of the discriminatory practice or action and any relevant facts; and
- d. Names and contact information of any witnesses, including county employees or contractors.

Washington County may dismiss a complaint for any of the following reasons:

- a. The complaint is withdrawn by the complainant.
- b. The complainant fails to respond to repeated requests for additional information needed to process the complaint.
- c. The complaint is untimely (the alleged discriminatory event occurred more than 180 days before the complaint was filed).
- d. The complainant cannot be located.
- e. The complaint is determined to be legally insufficient.

The complaint form must be signed or acknowledged, and returned to the Risk Manager either in person, by mail, or email. The Risk Manager or the Title VI Coordinator will acknowledge receipt of the complaint form.

Data Practices Rights Advisory

Under the Minnesota Government Data Practices Act (MGDPA), Minnesota Statutes Chapter 13, Washington County is required to inform you of your rights as they pertain to the private data collected from you and that is about you. Private data is information that is available to you but not to the public, except as allowed by law.

The purpose of requesting the data in the Title VI Discrimination Complaint Form is to permit the government entity to investigate and take action on alleged Title VI violations. Providing the information in the Title VI Discrimination Complaint Form is voluntary, but refusal to supply requested information may result in more limited services associated with the complaint's review being available. The data may be made available to county departments and other government agents whose job requires them to follow-up on your complaint. The data may also be shared with third-parties including courts, other government agencies, or the Minnesota Counties Intergovernmental Trust, if required by the particular circumstances of your complaint, and the County's follow-up. The data supplied may be used for other purposes as determined to be necessary in the administration of government services in Washington County.

Private data about you that you submit as part of a Title VI Discrimination Complaint Form may then be classified as public under the MGDPA, and such data is available to any member of the public who requests access. Data that is classified as private under the MGDPA is available only to you, the complainant, and to

other persons in governmental office and agencies who have a bona fide need for the data or persons and entities who are granted access by court order, state or federal law, or your written consent.

Additional information on [Washington County's guidelines and procedures](#) for adhering to the Minnesota Government Data Practices Act is available online.

Washington County Title VI Discrimination Complaint Form

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Private data about you that you submit as part of a Title VI Discrimination Complaint Form may then be classified as public under the MGDPA, and such data is available to any member of the public who requests access. Data that is classified as private under the MGDPA is available only to you, the complainant, and to other persons in governmental office and agencies who have a bona fide need for the data or persons and entities who are granted access by court order, state or federal law, or your written consent.

Additional information on [Washington County's guidelines and procedures](#) for adhering to the Minnesota Government Data Practices Act is available online.

1. Complainant's Name _____
This is the person filing the complaint, even if you are filing on behalf of someone else who experienced discrimination.
2. Complainant's Street Address _____
3. City _____ State _____ ZIP _____
4. Telephone Number (Daytime) _____ (Evening) _____
5. Email Address _____
6. Are you filing this complaint on behalf of someone else who experienced discrimination? If so, list their name below.

Name _____

Street address _____

City _____ State _____ ZIP _____

Telephone Number (Daytime) _____ (Evening) _____

Email _____

7. Date of the incident alleging discrimination _____

8. Describe the alleged discriminatory act. What happened and who was responsible? (For more space, attach additional sheets of paper or use the back of the form.)

9. Who are the persons you believe were involved?

10. Where did the incident take place? Please be as specific as possible.

11. Were there witnesses? If so, please provide their contact information.

Name _____
Street Address _____
City _____ State _____ ZIP _____
Telephone number (Daytime) _____ (Evening) _____
Email _____

Name _____
Street Address _____
City _____ State _____ ZIP _____
Telephone number (Daytime) _____ (Evening) _____
Email _____

Name _____
Street Address _____
City _____ State _____ ZIP _____
Telephone number (Daytime) _____ (Evening) _____
Email _____

12. Did you file this complaint with another federal, state or local agency, or with a federal or state court?
___ Yes ___ No

If the answer is yes, please indicate the agencies where you filed the complaint.
___ Federal agency ___ Federal court ___ State agency
___ State court ___ Local agency ___ Other

Please provide the contact information for the agency where you filed the complaint:

Name _____

Street Address _____

City _____ State _____ ZIP _____

Date filed _____

Please sign the complaint in the space below and attach any documents that support your complaint.

Complainant's Signature

Date

Please return this completed form to:

Risk Manager

Washington County Department of Human Resources

14949 62nd Street North Stillwater, MN 55082

TitleVIComplaint@WashingtonCountyMN.gov

Office Use

Date Received:

Received By: