



## **Iteris Title VI Policy**

### **I. Plan Statement**

Title VI of the Civil Rights Act of 1964 prohibits discrimination based on race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI 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" (42 U.S.C. Section 2000d).

Iteris will ensure that every manager, supervisor, employee, and sub-recipient of federal funds administered by Iteris is aware of and applies the intent and spirit of Title VI of the Civil Rights Act of 1964 and other nondiscrimination authorities in performing assigned duties.

This plan was developed to guide Iteris in its administration and management of Title VI-related activities.

Patricia Jefferies has been designated as Iteris' Title VI Coordinator and is responsible for ensuring that all matters relating to nondiscrimination are administered effectively.

### **Title VI Coordinator Contact Information**

Patricia Jefferies  
1700 Carnegie Ave Suite 100  
Santa Ana, CA 92705  
949-270-9541  
Tjefferies@iteris.com

### **II. Title VI Dissemination**

Title VI information posters shall be prominently and publicly displayed in the Iteris offices.

Nondiscrimination information shall be disseminated to Iteris employees annually (see Appendix A). This information reminds employees of Iteris' policy statement, and of their nondiscrimination responsibilities in their daily work and duties. All employees of Iteris are provided with a copy of the plan and are required to sign an Acknowledgement of Receipt (see Appendix B).

During New Employee Orientation, new employees shall be informed of the provisions of Title VI, and Iteris expectations to perform their duties accordingly.

### **III. Subcontractors and Vendors**

All subcontractors and vendors who receive payments from Iteris where funding originates from any federal assistance are subject to the provisions of Title VI of the Civil Rights Act of 1964 as amended.

Written contracts shall contain non-discrimination language, either directly or through the bid specification package which becomes an associated component of the contract.

### **IV. Record Keeping**

The Title VI Coordinator will maintain permanent records, which include, but are not limited to, signed acknowledgements of receipt from the employees indicating the receipt of Iteris' Title VI Plan, copies of Title VI complaints or lawsuits and related documentation, records of correspondence to and from complainants, and Title VI investigations.

### **V. Title VI Complaint Procedures**

The complainant may file a signed, written complaint up to one hundred and eighty (180) days from the date of the alleged discrimination. The complaint should include the following information:

- Name, mailing address, and how to contact you (i.e., telephone number, email address, etc.)
- How, when, where and why you believe you were discriminated against. Include the location, names, and contact information of any witnesses.
- Other information that you deem significant

The Title VI Complaint Form (see Appendix C) may be used to submit the complaint information. The complaint may be filed in writing or by e-mail with Iteris at the following address:

Iteris c/o Patricia Jefferies  
1700 Carnegie Ave Suite 100  
Santa Ana, CA 92705  
949-270-9541  
[Tjefferies@iteris.com](mailto:Tjefferies@iteris.com)

NOTE: Iteris encourages all complainants to certify all mail that is sent through the U.S. Postal Service and/or ensure that all written correspondence can be tracked easily.

All complaints alleging discrimination based on race, color, or national origin in a service or benefit provided by Iteris will be directly addressed by Iteris. Iteris shall also provide appropriate assistance to complainants, including those persons with disabilities, or who are limited in their ability to communicate in English. Additionally, Iteris shall make every effort to address all complaints in an expeditious and thorough manner.

A letter of acknowledging receipt of complaint will be mailed within seven days (see Appendix D). Please note that in responding to any requests for additional information, a complainant's failure to provide the requested information may result in the administrative closure of the complaint.

Iteris will send a final written response letter (see Appendix E or F) to the complainant. In the letter notifying complainant that the complaint is not substantiated (Appendix F), the complainant is also advised of his or her right to 1) appeal within seven calendar days of receipt of the final written decision from Iteris. Every effort will be made to respond to Title VI complaints within 60 working days of receipt of such complaints, if not sooner.

Once sufficient information for investigating the complaint is received by Iteris, a written response will be provided to the complaint.

## VI. Title VI Investigations, Complaints, and Lawsuits

### Lawsuits, Complaints, or Investigations Alleging Discrimination

Type (Investigation, Lawsuit, Complaint)	Date	Summary of Complaint	Status	Action(s) Taken

## VII. Limited English Proficiency (LEP) Plan

To ensure that language is not a barrier to access, Iteris has an outsourced translation service available.

In the event where an interpreter is needed, staff shall contact [www.languageline.com](http://www.languageline.com) for assistance. On the Language Line webpage, staff will select the **Need an**

**Interpreter Now** link in the popup window and follow the directions to receive an access code.

If you need more information or special assistance for LEP persons, contact Patricia Jefferies, Director, Human Resources in our Santa Ana, CA Office at 949.270.9451.

## **Appendix A Employee Annual Education Form**

### Iteris Title VI 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 or activity receiving federal financial assistance.

All employees of Iteris are expected to consider, respect, and observe this policy in their daily work and duties. If a citizen approaches you with a question or complaint, direct him or her to contact:

In all dealings with citizens, use courtesy titles (i.e., Mr., Mrs., Ms., or Miss) to respectfully address them without regard to race, color, or national origin.

## **Appendix B Acknowledgement of Receipt of Title VI Policy**

I hereby acknowledge the receipt of the Iteris Title VI Plan. I have read the plan and am committed to ensuring that no person is excluded from participation in or denied the benefits of its services on the basis of race, color, or national origin, as protected by Title VI of the Civil Rights Act of 1964.

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Employee signature

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Print name

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Date

## Appendix C Title VI Complaint Form

Title VI of the 1964 Civil Rights Act requires 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.” If you feel you have been discriminated against by an Iteris employee or with respect to your business interactions with Iteris, please provide the following information to assist us in processing your complaint.

Please print clearly:

Name: \_\_\_\_\_

Address: \_\_\_\_\_

City, State, Zip Code: \_\_\_\_\_

Telephone Number: \_\_\_\_\_ (home)

\_\_\_\_\_ (cell) \_\_\_\_\_ (message)

Are you filing this complaint on your own behalf?  yes\*  no

\*If yes to this question, please give that person’s information below.

Person discriminated against:

\_\_\_\_\_

Address of person discriminated against:

\_\_\_\_\_

City, State, Zip Code:

\_\_\_\_\_

Please indicate why you believe the discrimination occurred:

\_\_\_\_\_ race or color  
\_\_\_\_\_ national origin  
\_\_\_\_\_ income  
\_\_\_\_\_ other

What was the date of the alleged discrimination?

\_\_\_\_\_

Where did the alleged discrimination take place?

\_\_\_\_\_

Please describe the circumstances as you saw it:

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Please list all witnesses' names and phone numbers:

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Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State Court?  yes  no

If yes, check all that apply:

- Federal Agency \_\_\_\_\_
- Federal Court \_\_\_\_\_
- State Court \_\_\_\_\_
- State Agency \_\_\_\_\_
- Local Agency \_\_\_\_\_

Please provide information about a contact person at the agency/court where the complaint was filed.

Name: \_\_\_\_\_

Title: \_\_\_\_\_

Agency: \_\_\_\_\_

Address: \_\_\_\_\_

Telephone number: \_\_\_\_\_

What type of corrective action would you like to see taken?

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Please attach any documents you have which support the allegation. Then date and sign this form and send to the Title VI Coordinator at:

Patricia Jefferies  
Iteris  
1700 Carnegie Ave. Suite 100  
Santa Ana, CA 927054  
949-270-9541  
Tjefferies@iteris.com

\_\_\_\_\_  
Your signature

\_\_\_\_\_  
Print name

\_\_\_\_\_  
Date

**APPENDIX D      Letter Acknowledging Receipt of Complaint**

Today's Date

Ms. Jo Doe  
1234 Main St.  
Clarksville, Tennessee 37040

Dear Ms. Doe:

This letter is to acknowledge receipt of your complaint against Iteris alleging

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An investigation will begin shortly. If you have additional information you wish to convey or questions concerning this matter, please feel free to contact this office by telephoning 949-270-9541 or write to me at this address.

Sincerely,

Patricia Jefferies, Iteris Title VI Coordinator  
1700 Carnegie Ave.  
Suite 100  
Santa Ana, CA 927054  
949-270-9541  
Tjefferies@iteris.com

**APPENDIX E            Letter Notifying Complainant the Complaint Is Substantiated**

Today's Date

Ms. Jo Doe  
1234 Main St.  
Clarksville, Tennessee 37040

Dear Ms. Doe:

The matter referenced in your letter of **(DATE)** against Iteris alleging Title VI violation has been investigated.

(An/Several) apparent violation(s) of Title VI of the Civil Rights Act of 1964, including those mentioned in your letter (was/were) identified. Efforts are underway to correct these deficiencies.

Thank you for calling this important matter to our attention. You were extremely helpful during our review of the program. *(If a hearing is requested, the following sentence may be appropriate.)* You may be hearing from this office, or from federal authorities, if your services should be needed during the administrative hearing process.

Sincerely,

Patricia Jefferies, Iteris Title VI Coordinator  
1700 Carnegie Ave.  
Suite 100  
Santa Ana, CA 927054  
949-270-9541  
Tjefferies@iteris.com

**APPENDIX F Letter Notifying Complainant the Complaint Is Not Substantiated**

Today's Date

Ms. Jo Doe  
1234 Main St.  
Clarksville, Tennessee 37040

Dear Ms. Doe:

The matter referenced in your complaint of \_\_\_\_\_ (date) against Iteris alleging \_\_\_\_\_ has been investigated.

The results of the investigation did not indicate that the provisions of Title VI of the Civil Rights Act of 1964 had in fact been violated. As you know, Title VI prohibits discrimination based on race, color, or national origin in any program receiving federal financial assistance.

Iteris has analyzed the materials and facts pertaining to your case for evidence of the authority's failure to comply with any of the civil rights laws. There was no evidence found that any of these laws have been violated.

I therefore advise you that your complaint has not been substantiated, and that I am closing this matter in our files.

You have the right to 1) appeal within seven calendar days of receipt of this final written decision from Iteris.

Thank you for taking the time to contact us. If I can be of assistance to you in the future, do not hesitate to call me.

Sincerely,

Patricia Jefferies, Iteris Title VI Coordinator  
1700 Carnegie Ave.  
Suite 100  
Santa Ana, CA 927054  
949-270-9541  
Tjefferies@iteris.com

## **APPENDIX G**

### **Narrative to be included in Posters to be Displayed in Iteris Facilities**

Title VI of the Civil Rights Act of 1964 prohibits discrimination based on race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI 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" (42 U.S.C. Section 2000d).

Iteris will ensure that every manager, supervisor, employee, and sub-recipient of federal funds administered by Iteris is aware of and applies the intent and spirit of Title VI of the Civil Rights Act of 1964 and other nondiscrimination authorities in performing assigned duties.

Iteris is committed to ensuring that no person is excluded from participation in or denied the benefits of its services based on race, color, or national origin, as protected by Title VI of the Civil Rights Act of 1964. If you feel you are being denied participation in or being denied benefits of services provided by Iteris, you may contact our office at:

Patricia Jefferies, Iteris Title VI Coordinator  
1700 Carnegie Ave.  
Suite 100  
Santa Ana, CA 927054  
949-270-9541  
Tjefferies@iteris.com

For more information, visit our website at **[www.iteris.com](http://www.iteris.com)**.