



SORBA Tri-Cities

Title VI Non-Discrimination Policy

Policy Statement

SORBA Tri-Cities is committed to ensuring that all individuals have equal access to our programs, services, activities, and opportunities. In compliance with Title VI of the Civil Rights Act of 1964 and related federal and state laws, no person will be excluded from participation in, denied the benefits of, or subjected to discrimination under any program or activity of SORBA Tri-Cities on the basis of race, color, national origin, age, sex, religion, or disability.

Scope of Policy

This policy applies to all SORBA Tri-Cities programs, services, projects, events, and activities, whether conducted directly by the organization or through partnerships, contractors, or volunteers.

Implementation

- All members of the public are welcomed and encouraged to participate in SORBA Tri-Cities programs and activities.
- SORBA Tri-Cities will communicate this policy to its staff, volunteers, and partners and provide training as appropriate.
- Any contracts or agreements entered into by SORBA Tri-Cities will include assurances of compliance with Title VI requirements.

Complaint Procedure

Any person who believes they have been subjected to discrimination under Title VI may file a written complaint with SORBA Tri-Cities. Complaints must be submitted within 180 days of the alleged discrimination. SORBA Tri-Cities will promptly investigate and work to resolve all complaints in accordance with applicable regulations.

For more information about this policy or to file a complaint, please contact:

Abraham McIntyre
Southern Off-Road Bicycle Association
SORBA Tri-Cities | Executive Director
C: 423-430-7406

SORBA Tri-Cities

Title VI Complaint Procedure



Purpose

This procedure establishes a system for processing complaints alleging discrimination under Title VI of the Civil Rights Act of 1964. SORBA Tri-Cities is committed to ensuring that no person is excluded from participation in, denied the benefits of, or otherwise subjected to discrimination on the basis of race, color, national origin, age, sex, religion, or disability in any of our programs or activities.

How to File a Complaint

1. Who May File

Any person who believes they have been subjected to discrimination by SORBA Tri-Cities under Title VI may file a complaint. A representative may also file on behalf of a minor, person with a disability, or another affected individual.

2. Timeframe

Complaints must be filed within **180 days** of the alleged act of discrimination.

3. Format

- Complaints must be submitted **in writing** and signed by the complainant or their authorized representative.
- A complaint form is available from SORBA Tri-Cities upon request, but a letter including the necessary details is also acceptable.

4. Required Information

- Name, address, and contact information of the complainant
- Name of the person(s) or organization alleged to have discriminated
- Description of the alleged discriminatory action(s), including date(s) and location(s)
- Basis of discrimination (race, color, national origin, age, sex, religion, or disability)
- Signature and date

Complaints should be sent to:

Abraham McIntyre
Southern Off-Road Bicycle Association
SORBA Tri-Cities | Executive Director
C: 423-430-7406

SORBA Tri-Cities

Title VI Complaint Procedure



Complaint Review Process

- **Acknowledgment:** Complaints will be acknowledged in writing within **10 business days** of receipt.
- **Investigation:** The Executive Director (or designated Title VI Coordinator) will review the complaint, gather relevant information, and may interview involved parties.
- **Determination:** A written response with findings and any actions to be taken will be issued within **60 calendar days** of receiving the complaint.
- **Appeal:** If the complainant is dissatisfied with the resolution, they may appeal in writing within **30 days** of the decision. The appeal will be reviewed by the SORBA Tri-Cities Board of Directors.

External Filing Options

Complainants also have the right to file directly with external agencies, including:

- U.S. Department of Justice, Civil Rights Division
- U.S. Department of Transportation, Office of Civil Rights
- Tennessee Department of Transportation, Office of Civil Rights

SORBA Tri-Cities

Title VI Complaint Form



SORBA Tri-Cities is committed to ensuring that no person is excluded from participation in, denied the benefits of, or otherwise subjected to discrimination on the basis of race, color, national origin, age, sex, religion, or disability.

If you believe you have been subjected to discrimination under Title VI, please complete this form and return it to:

Abraham McIntyre
Southern Off-Road Bicycle Association
SORBA Tri-Cities | Executive Director
C: 423-430-7406

Complainant Information

- Name: _____
- Address: _____
- City/State/Zip: _____
- Phone: _____ Email: _____

Representative Information (if filing on behalf of someone else)

- Name: _____
- Relationship to Complainant: _____
- Phone: _____ Email: _____

Complaint Details

1. Name of person, agency, or organization you believe discriminated against you:

2. Date(s) of alleged discrimination: _____



3. Location(s) of alleged discrimination: _____

4. Basis of discrimination (check all that apply):

☐ Race ☐ Color ☐ National Origin ☐ Age ☐ Sex ☐ Religion ☐ Disability

5. Please describe the alleged discriminatory action(s). Include as many details as possible:

Signature

I certify that the information provided is true and correct to the best of my knowledge.

Signature: _____ Date: _____

Note: Complaints must be filed within **180 days** of the alleged discrimination.

SORBA Tri-Cities

Title VI Monitoring and Enforcement Policies and Procedures



Policy Statement

SORBA Tri-Cities is committed to full compliance with Title VI of the Civil Rights Act of 1964 and all related federal and state non-discrimination requirements. We will ensure that no person is excluded from participation in, denied the benefits of, or otherwise subjected to discrimination on the basis of race, color, national origin, age, sex, religion, or disability in any of our programs, services, or activities.

This policy applies to all SORBA Tri-Cities operations, including programs conducted directly by staff, those carried out by volunteers, and those delivered through partnerships, contracts, or subrecipients.

Procedures for Monitoring Compliance

1. Designation of Title VI Coordinator

- The Executive Director will serve as the Title VI Coordinator for SORBA Tri-Cities or designate a qualified staff member.
- The Coordinator will oversee implementation, monitoring, and enforcement of Title VI compliance.

2. Communication of Policy

- The Title VI Non-Discrimination Policy and Complaint Procedure will be posted on the SORBA Tri-Cities website, included in outreach materials, and displayed at public events when applicable.
- All contractors, partners, and volunteers will be informed of their obligation to comply with Title VI.

3. Training

- Staff, Board members, and key volunteers will receive annual Title VI compliance training.
- Training will include recognizing potential discrimination, handling complaints, and understanding the complaint referral process.

4. Review of Programs and Activities

- The Title VI Coordinator will conduct an annual self-assessment to ensure:
 - Equal access to programs and services.
 - Outreach materials are available in plain language and, when reasonable, in multiple languages.
 - Events and activities are held in accessible locations.



- Partner organizations and contractors will be required to certify compliance with Title VI as part of their agreements.

5. Data Collection

- When appropriate, SORBA Tri-Cities will collect demographic data related to program participants to monitor inclusivity.
- No personal information will be used for purposes other than compliance review.

Procedures for Enforcement

1. Complaint Intake and Acknowledgment

- Complaints must be submitted in writing within 180 days of the alleged discrimination.
- The Title VI Coordinator will acknowledge receipt of complaints within **10 business days**.

2. Investigation

- The Title VI Coordinator will review the complaint, interview relevant parties, and collect documentation as necessary.
- Investigations will be completed within **60 calendar days** of receiving the complaint.

3. Findings and Resolution

- A written determination will be provided to the complainant, outlining findings and any corrective actions.
- If a violation is found, corrective measures will be implemented promptly, which may include staff training, revised procedures, or adjustments to programs or services.

4. Appeals

- If the complainant disagrees with the resolution, they may file a written appeal within **30 calendar days**.
- Appeals will be reviewed by the SORBA Tri-Cities Board of Directors, whose decision will be final at the organizational level.

5. Referral to External Agencies

- Complainants retain the right to file directly with the Tennessee Department of Transportation, the U.S. Department of Justice, or the U.S. Department of Transportation Office of Civil Rights.



- SORBA Tri-Cities will cooperate fully with any external investigation or compliance review.

Monitoring and Reporting

- The Title VI Coordinator will prepare an **annual Title VI Compliance Report** for the Board of Directors, summarizing:
 - Complaints received and resolutions.
 - Training activities.
 - Program reviews and any corrective actions taken.
- Records of all complaints and compliance activities will be maintained for **a minimum of three years**.

Corrective Actions

- If monitoring or investigation identifies non-compliance with Title VI, SORBA Tri-Cities will:
 1. Notify responsible staff, volunteers, or partners of the violation.
 2. Provide technical assistance or additional training as needed.
 3. Establish deadlines for corrective measures.
 4. If violations are not corrected, consider termination of contracts, volunteer roles, or partnerships as appropriate.



SORBA Tri-Cities

Title VI Annual Compliance Checklist

Year: _____

Completed by: _____ (Title VI Coordinator/Executive Director)

Date: _____

1. Policy Communication

- ☐ Title VI Policy publicly posted (website, outreach materials, signage at events)
- ☐ Policy reviewed and approved by Board this year

Notes: _____

2. Training & Awareness

- ☐ Board members trained on Title VI compliance
- ☐ Staff and key volunteers trained
- ☐ Contractors/partners informed of Title VI obligations

Training date(s): _____

Notes: _____

3. Program and Event Review

- ☐ Programs/events were accessible to all participants
- ☐ Outreach materials available in plain language
- ☐ Consideration given to translation or interpretation needs
- ☐ Locations were ADA accessible

Notes: _____

4. Complaint Monitoring

- ☐ Zero complaints received this year

OR

- ☐ Complaint(s) received: _____ (number)
 - Investigations completed: ☐ Yes ☐ No
 - Resolutions issued within 60 days: ☐ Yes ☐ No
 - Appeals processed: ☐ Yes ☐ No

Summary of complaint(s) (attach details if needed):

5. Corrective Actions

- ☐ No corrective actions required

☐ Corrective actions taken: _____



6. Annual Report

- ☐ Annual Title VI Compliance Report prepared and presented to Board
- ☐ Records maintained for at least three years

Certification

I certify that SORBA Tri-Cities has reviewed and documented its Title VI compliance activities for the year listed above.

Signature: _____

Title: _____

Date: _____

SORBA Tri-Cities

Title VI Contract Statement



During the performance of this contract, the contractor, subcontractor, or partner agrees as follows:

1. Non-Discrimination

The contractor shall comply with Title VI of the Civil Rights Act of 1964, 42 U.S.C. §2000d, and all related federal and state civil rights laws. No person shall, on the grounds of race, color, national origin, age, sex, religion, or disability, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program, service, or activity carried out under this contract.

2. Inclusion in Subcontracts

The contractor shall include the above non-discrimination statement in every subcontract, purchase order, or agreement related to the performance of this contract.

3. Compliance Assurance

The contractor shall cooperate with SORBA Tri-Cities and any state or federal agency in any compliance review or investigation related to Title VI obligations. Failure to comply with this statement shall be grounds for termination of the contract and may result in disqualification from future agreements.

SORBA Tri-Cities

Limited English Proficiency (LEP)

Policy and Procedure



Policy Statement

- SORBA Tri-Cities is committed to ensuring meaningful access to programs, services, and activities for individuals with Limited English Proficiency (LEP). In compliance with Title VI of the Civil Rights Act of 1964 and Executive Order 13166, no person will be denied access to our services or discriminated against on the basis of their inability to speak, read, write, or understand English.

Procedures for Addressing LEP Needs

1. Identification of LEP Individuals

- Staff and volunteers will be trained to recognize when a person may have difficulty communicating in English and may require language assistance.
- Language assistance needs may be identified through:
 - Self-identification by the individual.
 - Requests for an interpreter or translated materials.
 - Staff observation of difficulty in communication.

2. Provision of Language Assistance

SORBA Tri-Cities will take reasonable steps to ensure LEP individuals have meaningful access to our programs and activities:

- **Oral Language Assistance**
 - Use bilingual staff or volunteers, when available.
 - Use community-based interpretation resources, such as local partners, schools, or service providers.
 - Utilize telephonic or virtual interpretation services if on-site assistance is not available.
- **Written Translation**
 - Vital documents (e.g., Title VI Complaint Form, event registration forms, safety information) will be made available in Spanish, the most common non-English language in our service area, when reasonable and upon request.
 - Other documents will be translated as needed based on demand and resources.



- **Notice to the Public**

- LEP individuals will be notified of the availability of free language assistance through signage, outreach materials, and the SORBA Tri-Cities website.

3. Staff and Volunteer Training

- Staff and key volunteers will receive annual training on:
 - Obligations to provide meaningful access under Title VI.
 - How to identify LEP needs.
 - How to access interpretation and translation resources.

4. Monitoring and Evaluation

- The Title VI Coordinator will review the LEP Policy annually to determine if language needs in the community have changed.
- Feedback from LEP individuals, community partners, and staff will be used to improve language access services.
- Records will be maintained of language assistance requests and how they were addressed.

5. Complaints

- Any person who believes they were denied meaningful access to SORBA Tri-Cities programs or services due to limited English proficiency may file a complaint under the Title VI Complaint Procedure.

SORBA Tri-Cities

Oral Language Assistance Plan



1. Public Notice (Formal Statement)

“Language assistance services are available at no cost. If you have difficulty understanding English, SORBA Tri-Cities will provide oral interpretation or other assistance to help you access our programs, services, and events. Please ask a staff member or volunteer for assistance, or contact us.”

2. Short Signage for Events/Check-in Tables

- **English:** “Need help in another language? Ask us. We can provide free interpretation.”
- **Spanish:** “¿Necesita ayuda en otro idioma? Pregúntenos. Podemos proporcionar interpretación gratuita.”
- Additional languages can be added based on community needs — e.g., Arabic, Vietnamese, etc.

3. Website/Registration Form Language

- *“Do you need help in another language? SORBA Tri-Cities can provide free oral interpretation at events and programs. Please let us know your language needs at least 5 days before the event, or ask a volunteer for help on-site.”*

4. Staff/Volunteer Quick Script

- For when someone appears to need language help:
 - **English:** “We can provide free interpretation in your language. Please wait one moment while we get assistance.”
 - **Spanish:** “Podemos proporcionar interpretación gratuita en su idioma. Por favor espere un momento mientras conseguimos ayuda.”
 - Staff can then use a bilingual volunteer, community partner, or phone interpretation service.

5. Training/Procedural Material for Staff & Volunteers

- **Options for Oral Language Assistance at SORBA Tri-Cities Events and Programs:**
 - **Bilingual staff/volunteers:** Identify known volunteers who can provide interpretation in Spanish or other common languages.



- **Community resources:** Partner with local schools, universities, or advocacy groups who can provide interpreters.
- **Telephone/virtual interpretation:** Maintain a list of local or national phone interpretation services as a backup option.
- **Family/friends of participant:** May be used if the participant requests, but never required. (Avoid using children as interpreters.)

6. Outreach Language (Flyer or Social Media)

- *“Everyone is welcome at SORBA Tri-Cities events. Free help is available if you do not speak English well. Ask us for an interpreter.”*

SORBA Tri-Cities

Notice to LEP Persons: Policies and Practices



SORBA Tri-Cities Commitment

- We will provide clear notice, in languages LEP persons can understand, that they are entitled to free language assistance in order to access programs, services, and activities.

1. Written Notice

- **Public Documents**

- Include a statement in English and Spanish (and other locally common languages, as identified) on all major outreach documents, event registration forms, and flyers:

“Free language assistance is available. If you need help in another language, please contact us.”

- **Vital Documents**

- Translate essential forms (e.g., Title VI Complaint Form, waiver/registration forms, safety instructions) into Spanish.
- Provide additional translations based on community needs identified through review or requests

2. Signage at Events and Programs

- Post bilingual signs (English + Spanish) at check-in tables, kiosks, or entry points at SORBA Tri-Cities events and trail programs stating:
“Language assistance services are available free of charge. Please ask for help.”
- Add pictograms/icons for “translation” or “interpreter available” to make signage understandable across literacy levels.

3. Website and Digital Media

- Publish a Title VI / LEP statement on the SORBA Tri-Cities website in English and Spanish.
- Post social media notices before events in both English and Spanish, stating that free interpretation will be provided upon request.



4. Verbal Notice

- Train volunteers and staff to offer assistance when it appears someone may have difficulty with English.
- Use a simple bilingual script:
 - English: *"We provide free help in your language. Please let us know if you need assistance."*
 - Spanish: *"Ofrecemos ayuda gratuita en su idioma. Por favor díganos si necesita asistencia."*

5. Outreach Through Community Partners

- Provide translated notices about SORBA Tri-Cities' services to local organizations that serve immigrant and refugee populations (schools, churches, nonprofits, clinics).
- Ask partners to share information about the availability of free language assistance with their clients and networks.

6. Proactive Communication

- Announce availability of free interpretation at the start of public meetings, guided rides, or volunteer events.
- When possible, recruit bilingual volunteers to proactively engage with LEP participants.

7. Continuous Improvement

- Review annually whether additional languages (beyond Spanish) are needed based on participant demographics or requests.
- Keep records of when and how language assistance was provided to track effectiveness.