

Exhibit B

CITY OF ST. AUGUSTINE

TITLE VI PROGRAM COMPLIANCE PROCEDURES FOR TRACKING AND INVESTIGATING TITLE VI COMPLAINTS

In order to ensure compliance with Title VI of the Civil Rights Act of 1964, as amended, and with 49 CFR Section 21.9(b), the City of St. Augustine has adopted the following procedures for tracking and investigating Title VI complaints:

1. In order to comply with 49 CFR Section 21.9(b), the City Attorney's Office shall prepare and maintain a list of any active investigations, lawsuits or complaints naming the City which allege discrimination on the basis of race, color or national origin. This list shall include the date the investigation, lawsuit or complaint was filed, a summary of the allegation(s); the status of the investigation, lawsuit or complaint; and actions taken by the City in response to the investigation, lawsuit or complaint.
2. All Title VI complaints received by the City shall be referred to the City Attorney's Office for investigation, tracking and response.
3. The City Attorney shall direct an investigation of the complaint for subject matter, jurisdiction, legal sufficiency and the accuracy of the factual allegations of the complaint.
4. The City Attorney shall track the progress of the City's investigation and the progress of any investigation by the agency receiving the complaint.
5. The City Attorney shall research and prepare any responses required to the claimant and shall file all such responses in a timely manner.
6. The City Attorney shall ensure that all documents and records created and maintained comply with the requirements of the Federal Freedom of Information Act and the Florida Public Records Act.