

Senior Resource Center for Douglas County, Inc.

10. NON-DISCRIMINATION AND TITLE VI PLAN



Nondiscrimination and Title VI Plan

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I. Title VI Notice to the Public

This notice is posted throughout the facility, all Senior Wheels vehicles, and the Senior Resource Center for Douglas County (SRC) web page www.YourSRC.org.

Notifying the Public of Rights Under Title VI

**Senior Resource Center
for Douglas County, Inc. (SRC)**

- Senior Resource Center for Douglas County, Inc. (SRC) operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with SRC.

- For more information on the Senior Resource Center's civil rights program, and the procedures to file a complaint, contact

785-842-0543, (TTY 800-766-3777)

Email seniorwheels@Yoursrc.org

or visit our administrative office at

745 Vermont Street, Lawrence, KS 66044-2371.

For more information, visit www.Yoursrc.org

- A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the

Office of Civil Rights
Attention: Title VI Program Coordinator
East Building, 5th Floor-TCR, 1200 New Jersey Ave. SE
Washington, DC 20590

- Para asistencia en español llamarnos al (785) 842-0543 pulse #0, y deje su mensaje en español. Nos comunicaremos con usted en los próximos días.

II. Assurances

The Senior Resource Center for Douglas County, as a recipient of federal funds for programs, has given the assurance that within daily operations, the Senior Resource Center for Douglas County will not discriminate against any person on the basis of race, color, national origin, sex, age, disability, veteran, or low-income status.

III. Definition of Title VI

Title VI and related statutes prohibit discrimination on the basis of race, veteran status, color, sex, age, disability, low income, or national origin in any aspect of a program receiving federal-aid funds.

IV. The Laws

Title VI of the Civil Rights Act of 1964 as amended and 49 CFR Part 21 prohibit discrimination based on race, color and national origin in all federal-aid programs.

Sex discrimination is also prohibited by Section 162 (a) of the Federal-Aid Highway Act of 1973, Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act of 1990 (see 49 CFR 27) prohibit discrimination based on disability and The Age Discrimination Act of 1975 (42 USC 6101) prohibits discrimination based on age.

The basic philosophy of the laws is that people affected by our programs should receive the services, benefits, and opportunities to which they are entitled with no differences because of race, color, national origin, age, sex, disability, veteran, or low-income status.

V. Title VI Complaint Procedures

The following pertains only to Title VI complaints regarding the services of Senior Resource Center for Douglas County, Inc.

Senior Resource Center for Douglas County, Inc. has in place a Title VI Complaint Procedure, which outlines a process for local disposition of Title VI complaints and is consistent with guidelines found in Chapter III of the Federal Transit Administration Circular 4702.1B, dated October 1, 2012. If you believe that the Senior Resource Center, Inc.'s federally funded programs have discriminated your civil rights on the basis of race, color, or national origin you may file a written complaint by following the procedure outlined below:

1. Submission of Complaint

Any person who feels that he or she, individually or as a member of any class of persons, on the basis of race, color, or national origin has been excluded from or denied the benefits of or subjected to discrimination caused by Senior Resource Center for Douglas County, Inc., may file a written complaint with the Senior Resource Center for Douglas County, Inc.'s Executive Director. A complaint form is available for download

at www.yoursrc.org and in hard copy format at the offices of the Senior Resource Center for Douglas County, Inc. Upon request, SRC will mail the complaint form. Senior Resource Center for Douglas County investigates complaints received no more than 180 days after the alleged incident. The Senior Resource Center for Douglas County, Inc. will process complaints that are complete.

Assistance in the preparation of any complaints will be provided to a person or persons upon request and as appropriate. If information is needed in another language, contact Heidi Briery or Stefanie Macfarlane at (785) 842-0543, (TTY 1-800-766-3777).

El Senior Resource Center de Douglas County ofrecerá servicios en español para clientes que lo necesiten. Estamos aquí para usted, preparados para responder a sus dudas, ayudarle directamente o ponerle en contacto con los servicios que necesite. No dude en llamarnos al 785-842-0543. Para español, pulse #0 y deje su mensaje en español. Nos comunicaremos con usted en los próximos días. También puede escribirnos un correo electrónico en inglés o en español a través de este link: <https://yoursrc.org/home/about/contact-us/>

Complaints should be mailed to or submitted by hand to:

**Senior Resource Center for Douglas County
Attn: Executive Director
745 Vermont St.
Lawrence, KS 66044-2371**

2. Referral to Review Officer

Upon receipt of the complaint, the Executive Director shall appoint one or more staff review officers, as appropriate, to evaluate and investigate the complaint. If more information is needed to resolve the case, the Executive Director may contact the Complainant. The Complainant has 15 business days from the date of the letter to send requested information or meet in person with the staff review officer(s) to further explain his or her complaint. If the investigator is not contacted by the complainant or does not receive the additional information within 15 business days, the Executive Director can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

The staff review officer(s) shall complete their review no later than 45 calendar days after the date the agency received the complaint. If more time is required, the Executive Director shall notify the Complainant of the estimated timeframe for completing the review.

Upon completion of the review, the staff review officer(s) shall make a recommendation regarding the merit of the complaint and whether remedial actions are available to provide redress. Additionally, the staff review officer(s) may recommend improvements to the SRC processes relative to Title VI, as appropriate. The staff review officer(s) shall forward their recommendations to the Executive Director for concurrence. If the Executive Director concurs, he or she shall issue the Senior Resource Center for Douglas County written response to the Complainant. This final

report should include a summary of the investigation, all findings with recommendations, corrective measures where appropriate.

Note: Upon receipt of a complaint, the Senior Resource Center for Douglas County shall forward a copy of this complaint and the resulting written response to the appropriate KDOT and FTA-Region 7 contacts.

3. Request for Reconsideration

If the Complainant disagrees with the Executive Director's response, he or she may request reconsideration by submitting the request, in writing, to the Executive Director within 10 calendar days after receipt of the Executive Director's response. The request for reconsideration shall be sufficiently detailed to contain any items the Complainant feels were not fully understood by the Executive Director. The Executive Director will notify the Complainant of his or her decision in writing either to accept or reject the request for reconsideration within 10 calendar days. In cases where the agency Executive Director agrees to reconsider, the matter shall be returned to the staff review officer(s) to re-evaluate in accordance with Paragraph 2 above.

4. Appeal

If the request for reconsideration is denied, the Complainant may appeal the Executive Director's response by submitting a written appeal to Senior Resource Center for Douglas County, Inc. Board of Directors no later than 10 calendar days after receipt of the Executive Director's written decision rejecting reconsideration. The Senior Resource Center for Douglas County, Inc. Board of Directors will then make a determination to either request re-evaluation by the staff Review Officer(s) or forward the complaint to KDOT for further investigation.

5. Submission of Complaint to the State of Kansas Department of Transportation.

If the Complainant is dissatisfied with the Senior Resource Center for Douglas County, Inc.'s resolution of the complaint, he or she may also submit a written complaint within 180 days after the alleged date of discrimination to the State of Kansas Department of Transportation for further investigation.

**KDOT Office of Contract Compliance
Eisenhower State Office Building
700 Southwest Harrison
3rd Floor West
Topeka, KS 66603**

VI. Title VI Complaint Form

The purpose of this form is to assist you in filing a complaint with the Senior Resource Center for Douglas County (SRC). You are not required to use this form; a letter containing the same information will be sufficient.

For questions about Senior Resource Center for Douglas County's (SRC) Americans with Disabilities Act (ADA) complaint procedures or complaint form contact Heidi Briery, ADA Compliance Officer, (785) 727-7877 or hbriery@yoursrc.org.

| | | | | |
|---|-------------|--|-------------------|----|
| Section I: | | | | |
| Name: | | | | |
| Address: | | | | |
| Telephone (Home): | | | Telephone (Work): | |
| Electronic Mail Address: | | | | |
| Accessible Format Requirements? | Large Print | | Audio Tape | |
| | TDD | | Other | |
| Section II: | | | | |
| Are you filing this complaint on your own behalf? | | | Yes* | No |
| *If you answered "yes" to this question, go to Section III. | | | | |
| If not, please supply the name and relationship of the person for whom you are complaining: | | | | |
| Please explain why you have filed for a third party: | | | | |
| Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party. | | | Yes | No |
| Section III: | | | | |

I believe the discrimination I experienced was based on (check all that apply):

Race Color National Origin Age Disability

Other (specify) _____

Date of Alleged Discrimination (Month, Day, Year): _____

Time of Day: _____

Location: _____

(Continued on next page)

Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please attach additional pages.

Witness(es): YES NO

List Witness(es): *(Attach a separate sheet, if necessary)*

(1) Name:

Phone Number: ()

(2) Name:

Phone Number: ()

(3) Name:

Phone Number: ()

(4) Name:

Phone Number: ()

(Continued on next page)

Section IV

| | | |
|--|-----|----|
| Have you previously filed a Title VI complaint with this agency? | Yes | No |
|--|-----|----|

Section V

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 Agency _____

State Court _____ Local Agency _____

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

Name: _____

Title: _____

Agency: _____

Address: _____

Telephone: _____

Section VI

Name of agency complaint is against: _____

Contact person: _____

Title: _____

Telephone number: _____

You may attach any written materials or other information that you think is relevant to your complaint.

Signature and date required below:

Signature _____

Date _____

Please submit this form in person at the address below, or mail this form to:

Senior Resource Center for Douglas County
745 Vermont St
Lawrence, KS 66044

INTERNAL USE ONLY
To be completed by Title VI Compliance Officer

Accepted for formal Investigation _____/_____/_____

Referred to another department on _____/_____/_____

Rejected _____/_____/_____

Reason for Rejection:

Heidi Briery, Title VI Compliance Officer

Date

VII. List of Title VI Investigations, Lawsuits and Complaints

| | Date Submitted/Filed (Month,Day,Year) | Summary of allegation (include basis of complaint: race, color or national origin) | Status | Resolution/ Action Taken |
|-----------------------|--|---|---------------|---------------------------------|
| Investigations | | | | |
| <u>1</u> | | | | |
| <u>2</u> | | | | |
| Lawsuits | | | | |
| <u>1</u> | | | | |
| <u>2</u> | | | | |
| Complaints | | | | |
| <u>1</u> | | | | |
| <u>2</u> | | | | |

VIII. Table Depicting Membership of Committees, Councils, Broken Down by Race

| Body | Caucasian | Hispanic | Black | Asian American | Native American | Other |
|---------------------------------------|------------------|-----------------|--------------|-----------------------|------------------------|--------------|
| Population within service area | 78.1% | 6.5% | 4.7% | 5% | 2.7% | 4.2% |
| Agency Board of Directors | 73% | 0% | 0% | 9% | 9% | 0% |
| Agency Staff | 77% | 0% | 16% | 6% | 1% | 0% |

Note: Douglas County data includes the entire county, including the four cities and rural unincorporated areas. Data Source: U.S. Census Bureau, Population Division: Annual County Resident Population Estimates by Age, Sex, Race, and Hispanic Origin: April 1, 2010 to July 1, 2019. For population estimates methodology statements, <https://www.census.gov/quickfacts/fact/table/douglascountykansas,lawrencecitykansas,KS/PST045221>

Language Assistance Plan Limited English Proficiency Plan (LEP) Preview

The purpose of developing a Limited English plan is to identify individuals with limited English proficiency and develop strategies for the transit agency to reduce or eliminate barriers to these individuals.

I. Introduction

On August 11, 2000, President Bill Clinton issued Executive Order 13166 "Improving Access to Services for Persons with Limited English Proficiency" (65 FR 50121). The intent of this Executive Order is to improve access to federally conducted, and federally assisted programs and activities for persons who are limited in their English proficiency. The purpose of developing an LEP plan, as a recipient of federal funds, is to identify the extent of LEP individuals in the region and identify ways that the transit agency can reduce and/or eliminate the barriers to LEP individuals. The starting point for developing this plan is to perform a four-factor analysis to determine the individualized needs of the region. After these needs are identified, the transit agency should develop a language assistance plan addressing the mix of services that will be provided.

II. Four Factor Analysis

The Department of Transportation guidance outlines "four factors" recipients are to consider when assessing language needs and determining appropriate steps to ensure meaningful access to services for LEP services. Through conducting the "Four Factor Analysis," Senior Resource Center for Douglas County is better positioned to formalize and implement a cost-effective and appropriate mix of proactive language assistance measures and to respond to requests for LEP assistance from constituents. The four factors are as follows:

Identify the number of or proportion of LEP individuals that can utilize the service provided by Douglas County Senior Services, Inc.

Using the US Census 2018 ACS 5-year Survey, we find that there are no language groups that fit the criteria of more than 5% of total population and more than 50 persons who "speak English less than very well. We do serve some individuals who would be categorized as this. In that case, we rely on Google Translator or an interpreter to assist us with communication and scheduling rides for those individuals.

Identify the frequency in which LEP individuals come in contact with the service.

Currently, there are not any language groups that qualify as a LEP group. However, Senior Resource Center for Douglas County, Inc. serves several language groups on a regular basis.

Identify the importance of the service to the LEP community.

The Senior Resource Center for Douglas County, Inc. Senior Wheels provides transportation for medical, nutritional, and personal reasons to adults aged 60 and older in the Douglas County community. We utilize Google Translator or an interpreter to communicate and schedule rides for individuals who speak English less than very well.

Identify the resources available and the respective costs of these resources.

Thanks to technology Google Translator and is available on all SRC communication devices. Currently, the interpreters are either volunteers through Somos Lawrence, faith based or family members of the individuals who speak English less than very well, so there is no cost associated with this service.

III. Limited English Proficiency Plan

Senior Resource Center for Douglas County, Inc. will continue to use the existing agency strategy, which is as follows:

Identified LEP individuals

There are no specific population groups that meet the criteria of more than 5% and more than 50 individuals.

Language Assistance Measures

An interpreter will be used to communicate and schedule rides for those who have a language barrier. Senior Resource Center for Douglas County, Inc. will use online translation tools, Braille services, sign language interpreters, the Language departments at the University of Kansas and other local language-specific outreach programs to assist with language barriers.

Training Staff

The dispatcher will communicate with the interpreter to schedule the rides. The drivers will communicate utilizing a translation app on the tablet or cell phone as best as possible with the riders during the route.

Providing Notice

The LEP Plan will be posted on the agency's website, www.yoursrc.org. LEP plan will be provided to any person or agency requesting a copy. The person of contact in regard to the LEP Plan is Heidi Briery and can be reached via phone at (785) 727-7877.

Monitoring and Updating the LEP Plan

Senior Resource Center for Douglas County, Inc. will update the plan according to the Title VI update schedule, which is every three years. The plan will also be updated any time changes in the demographics of the agencies service area are deemed significant in regard to LEP persons.

SENIOR RESOURCE CENTER FOR DOUGLAS COUNTY, INC.
SRC Public Participation Plan Outline and
Outreach Efforts since 2019

I. Brief description of provider's activities and services

Senior Resource Center for Douglas County, Inc. Senior Wheels provides origin to destination transportation service for adults 60 and over residing in Douglas County, Kansas. Our accessible transportation provides transport for medical appointments, prescription pick-up, shopping, work, and recreation.

II. Brief description of activities that would warrant public participation (i.e., fare changes, changes to service hours, route adjustments, service area changes).

Senior Resource Center for Douglas County, Inc. will notify the public of any fare changes, service hour changes, demand response service, and policy or procedure changes at least 30 days before any changes are made. Public comment/community input will be gathered utilizing our web site, forum, and other approved communication methods.

III. Description of Proactive Public Participation Strategies that would be used.

- Public hearings/meetings/workshops to be held at convenient times and accessible locations.
- Various advertising platforms would be utilized (Better Senior Living newsletter, web page, local newspapers, radio, and social media)
- A database of contacts is maintained, and all new customers are entered into this database
- When possible, an email would be sent to various list serves including Lawrence Area Partners in Aging membership, My Resource Connect, Douglas County Coalition on Aging participants, etc.
- Direct mailings to donor mailing list

IV. Description of outreach methods to engage minority and Limited English Proficiency (LEP) individuals (i.e., translation of public meeting materials, providing translation services if requested, targeted media messages in low-income neighborhoods of service area. Work with existing neighborhood and advocacy organizations).

- Spanish translation of our agency services info flier outlining services and ridership policies
- Translation services available upon request for brailing and sign language

- Outreach to rural community/low-income areas through community alliances and coalitions.

V. Description of desired outcomes of the Senior Resource Center for Douglas County, Inc.’s public participation efforts.

- SRC desires to have actively engaged Senior Wheels riders, stakeholders, and members of the general public in the decision-making process.
- SRC strives to provide adequate public notice of public participation activities and allowed proper time for public review and comment at key decision points.
- SRC desires to provide timely information about transportation issues and processes to transit riders, stakeholders, and members of the general public.
- SRC will provide responses to all public input as appropriate.
- SRC will have facilitated effective communication among a diverse group of stakeholders.
- SRC will have an established timetable for review of the Public Participation Process to ensure it provides full and open access to all.

VI. Summary of Outreach Efforts since 2019’s Plan

- The annual satisfaction survey was conducted. Our main focus was Senior Wheels past and present participants and community partners. We address any concerns disclosed from riders as well as their wants and needs for future changes to our program.
- Conducted a survey of all Douglas County Seniors for the purpose of determining what services seniors use and want. The survey was distributed to approximately 4,000 seniors in all geographic regions of the county in all living situations via paper and electronic form, and the invitation to participate in the survey was published in the local newspaper to reach an even wide audience.
- SRC launched Senior Wheels of Eudora in response to the results of significant surveying and data gathering in Eudora, in addition to deep conversations with City and community leaders. This program allows an ADA vehicle to “live” in Eudora at the Community Building. Trained volunteer drivers are coordinated through the SRC’s dispatch office to offer rides-for-donation as needed. The branding of this vehicle in a prominent location has also extended the outreach through visibility in the community and word-of-mouth encouragement from Eudora City and community leaders.