Senior NEIGHBORS
no longer alone

678 Front NW, Suite 205
Grand Rapids, MI 49504

Phone: 616.459.6019
seniorneighbors.org

Senior Neighbors, Inc.
Title VI Plan

Date Adopted: October 22, 2014
Date Reviewed & Revised: March 2018

I. Plan Statement

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of 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).

Senior Neighbors, Inc. is committed to ensuring that no person is excluded from participation in or denied the benefits of its transit services on the basis of race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1.B.

This plan was developed to guide Senior Neighbors, Inc. in its administration and management of Title VI-related activities.

Title VI Coordinator Contact information

Jeffery Gass, Director of Operations
678 Front Avenue NW Suite 205
Grand Rapids, MI 49504

Phone: 616-233-0286
Fax: 616-459-6953
Email: jgass@seniorneighbors.org

AREA AGENCY ON AGING OF WESTERN MICHIGAN
The Source for Seniors
BBB ACCREDITED CHARITY bbb.org
CHARITY NAVIGATOR ★★★★ Four Star Charity
Kent County Senior Millage
United Way
Heart of West Michigan United Way

II. Title VI Information Dissemination

Title VI information posters shall be prominently and publicly displayed in the Senior Neighbors, Inc. facilities, in the Senior Neighbors transit vehicles, and on the Senior Neighbors Website. Additional information relating to nondiscrimination obligation can be obtained from the Senior Neighbors, Inc. Title VI Coordinator.

Title VI information shall be disseminated to Senior Neighbors, Inc. employees annually via the Employee Education form (see Appendix A). This form reminds employees of the Senior Neighbor's Inc. policy statement, and of their Title VI responsibilities in their daily work and duties.

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

All employees shall be provided a copy of the Title VI Plan and are required to sign the Acknowledgement of Receipt (see Appendix B).

III. Subcontracts and Vendors

All subcontractors and vendors who receive payments from Senior Neighbors, Inc. 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 the Senior Neighbors, Inc. Title VI Plan, copies of Title VI complaints or lawsuits and related documentation, and records of correspondence to and from complainants, and Title VI investigations.

V. Title VI Complaint Procedures

How to file a Title VI Complaint?

The complainant may file a signed, written complaint up to thirty (30) days from the date of the alleged discrimination. The complaint should include the following information:

- Your 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 must be filed in writing with Senior Neighbors, Inc. at the following address:

Senior Neighbors, Inc.
678 Front Avenue NW Suite 205
Grand Rapids, MI 49504

NOTE: Senior Neighbors, Inc. 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. For complaints originally submitted by facsimile, an original, signed copy of the complaint must be mailed to the Title VI Coordinator as soon as possible, but no later than 30 days from the alleged date of discrimination.

What happens to the complaint after it is submitted?

All complaints alleging discrimination based on race, color or national origin in a service or benefit provided by Senior Neighbors, Inc. will be directly addressed by Senior Neighbors, Inc. Senior Neighbors, Inc. shall also provide appropriate assistance to complainants, including those persons with disabilities, or who are limited in their ability to communicate in English. Additionally, Senior Neighbors, Inc. 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 (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.

How will the complainant be notified of the outcome of the complaint?

Senior Neighbors, Inc. 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 Senior Neighbors, Inc., and/or 2) file a complaint externally with the U.S. Department of Transportation and/or the FTA. Every effort will be made to respond to Title VI complaints within 60 working days of receipt of such complaints, if not sooner.

In addition to the complaint process described above, a complainant may file a Title VI complaint with the following offices:

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

VI. Investigations, Complaints, and Lawsuits

Senior Neighbors has not had Transit-related Title VI investigations, complaints or lawsuits against them.

VII. Limited English Proficiency (LEP) Plan

Plan Summary

A Limited English Proficiency (LEP) person is described as one who does not speak English as his/her primary language and who has a limited ability to read, speak, write, or understand English. It is the intent of Senior Neighbors to be willing and prepared to help those to whom language may be a barrier to obtaining necessary services. Senior Neighbors has developed this Language Proficiency Plan to help identify reasonable steps in providing language assistance for LEP persons seeking access to Senior Neighbors transportation services.

This plan outlines procedures on how to identify persons who may need to use our service, but do not speak English well enough to adequately communicate with agency personnel without assistance. The plan details how to identify individuals who need language assistance, provide ways to obtain appropriate assistance, train staff, provide notice about our LEP procedures to LEP persons, and establish ways to monitor and update this plan.

Four Factor Analysis

1. **The number or proportion of LEP persons eligible to be served or likely to be encountered by a Senior Neighbors program, activity, or service.**

Senior Neighbors is an agency that works exclusively with people 60 years old or older. Our transportation clients are almost exclusively Kent County residents. It is Senior Neighbor's desire to treat each senior citizen encountered with respect and the dignity they deserve. According to the 2010 American Community Survey conducted by the U.S. Census Bureau, there are 98,262 residents over age 60 of the total 603,219 Kent County population. Three point seven percent (3,636) of Kent County seniors speak English "less than well" and 6.5% (6,387) speak a language other than English in the home. The census data found did not single out any specific languages. In the State of Michigan, the "Other Indo-European" language speakers make up the largest group of people in the general population who do not speak English in the home. While we have encountered very few people who exclusively speak Spanish, the Spanish speaking population in Kent County continues to grow.

2. **The frequency with which LEP persons come in contact with a Senior Neighbors program.**

As part of our Outreach and Assistance program, Senior Neighbors has reached out to refugee groups in our area. Currently, we regularly provide rides to approximately 7 Bosnian speaking refugees when we are scheduled to do so. We also periodically provide rides to Spanish speaking participants (approximately four times per year per vehicle) through the county-wide RideLink service. There is also a group of Vietnamese speaking seniors in our community, though census data regarding local non-English Vietnamese speaking senior individuals could not be found. The Grand Rapids area has a significant and growing group of Spanish speaking seniors. There is a sister organization in our community called Latin American Services. This organization specifically focuses on the Hispanic population, so most non-English speaking Hispanic seniors attend their senior center, use their case management services and take rides on their buses. In the last year, no one riding our buses has asked us to provide interpretation services.

3. **The importance of Senior Neighbor's service to the lives of people in our community.**

Senior Neighbors is dedicated to enhancing senior lives by improving their chances of living independently and reducing their isolation. We have buses stationed in the rural areas of Sparta and Lowell and in the suburb of Grandville. Sparta and Lowell buses, through the RideLink system, provide low cost transportation to seniors who live outside of the boundaries of the local transit system. This is the only low cost transportation available to people in rural areas of the county. We also have two six passenger vans that are located in Grand Rapids and give the inner city senior residents access to the low cost RideLink services.

4. **The resources available to Senior Neighbors and the cost.**

Senior Neighbors uses Bosnian and Vietnamese interpreters who charge between $25.00 and $60.00 per hour. For Spanish and other languages, we use the Hispanic Center, Voices for Health or other professional interpretation services. They charge between $45.00 and $100.00 per hour depending on the language and availability of interpreters. Sometimes family members can be used, though family members have to be carefully screened to insure that their interpretation is not pejorative. Updating these brochures will cost between $200.00 and $500.00. Annual trainings are provided for transportation staff. Training costs vary depending on availability of speakers and materials. Printing and distributing of new "I Speak" flash cards for the two vans will cost approximately $40.00. Access to Voices for Health three-way calling is available any time it is needed. Standard cost for this service is $1.60 per minute, but can vary depending on language.

Limited English Proficiency Plan Outline

Identifying LEP individuals who need language assistance

- Language identification flash cards are available for each driver and reception staff member so these cards can be used to help LEP consumers identify the language they speak. Cards are hanging from the receptionist's wall and are in glove boxes of vehicles. New cards are being purchased for the two vans.

- Each driver is trained in how to identify a LEP person and how to properly use the language identification flash cards.

- Each driver is trained in how to call a language assistance service. A sheet of paper with instructions on how to make a three-way call is kept in each bus.

- We survey drivers and other staff members with direct consumer contact on a yearly basis at the beginning of each fiscal year regarding their experiences with having any direct or indirect contact with LEP individuals. This will be done to help monitor need.

- We work with our local RideLink dispatch service to have them identify when we will be transporting an LEP individual, so appropriate interpretation services can be anticipated and provided as needed.

Language Assistance Measures

- Provide interpreter service telephone numbers, including three way telephone service, for drivers to use to call interpreters, if needed.

- Train drivers and reception staff to call for interpretation services when an LEP person who has difficulty communicating is identified.

Senior Neighbors Staff Training

- Senior Neighbor's staff members will be provided with the LEP plan and will be educated on procedures to follow. This information will also be part of the staff orientation process for new hires.

- Training topics will include:

    - Understanding the Title VI policy and LEP responsibilities.
    - Language assistance options available to staff members when working with LEP persons.
    - Use of Language Identification Flashcards.
    - Documentation of language assistance requests.
    - How to handle Title VI/LEP complaints.

Providing notice to LEP persons

- We currently have an active outreach program to refugee seniors in our community. One part time staff member is dedicated to this program. Regular transportation is provided to take Bosnian refugees grocery and necessity shopping at a local superstore. Times of these trips and sign-up procedures are posted in Bosnian in areas where these refugees frequent.

- Registration for the RideLink program, requests for rides, and ride manifests to our drivers are all provided through the local RAPID transit system. RAPID's LEP plan is used to help advertise and provide language services to seniors who contact them.

- Non-English outreach literature will be distributed through non-English publications, when needed.

Monitoring and updating the LEP plan

- Senior Neighbors will handle complaints through the use of our agency Grievance Procedure. An initial response to any complaint will be made by an administrative staff member within 48 business hours of the complaint. Documentation of the dispensation of the complaint will be maintained until the complaint is resolved. The agency leadership team will review all complaints and procedures reviewed and changed if necessary.

- Title VI Program update schedules will be followed and the LEP plan updated as needed. At minimum, updates will occur on a yearly basis by September 30 of each year. Each update should examine all plan components, including:
    - What is the current LEP population in our service area?
    - How many LEP persons were encountered?
    - Are their needs being met?
    - Have people moved in who use languages new to the area?
    - Are interpretation service lists up to date?
    - Has the agency's technology, staff or financial costs changed?
    - Has the agency fulfilled the goals and obligations of the plan?
    - Were complaints received and, if so, how were they resolved?
    - Have we genuinely attempted to comply with all Title VI rules?

Kent County has a growing population of Spanish speaking and other Indo-European speaking individuals, most of whom are served by organizations that serve persons of their specific ethnic background. Senior Neighbors has an LEP Plan developed using FTA's four factor analysis. Senior Neighbors continues to welcome anyone who has Limited English Proficiency and provides outreach to non-English speaking residents. For instance, we have an outreach program that specifically targets area refugees. These services primarily include case management and transportation. Other non-English speaking participants come from the county wide single access transportation system for seniors called Ridelink. Our transportation drivers and receptionists carry language identification flashcards and can use telephone interpretation services provided by the RAPID, our local transit service agency, when languages are identified. Transportation staff members have all become PASS certified. Part of this training includes sensitivity to people with disabilities and people of other languages and cultures. At the training, LEP procedures are explained. Our drivers will be surveyed annually to see how many LEP riders they have encountered, and trainings will be adjusted to meet the need. We are in the process of changing and updating all of our brochures and fliers. We intend to update our Spanish, Bosnian and Vietnamese brochures as part of this process. We have a nine question agency assessment tool that will help us analyze and update components of our plan.

VIII. Community Outreach

As an agency receiving federal financial assistance, we have made the following community outreach efforts:

Coordinated Public Transit-Human Services Transportation Plan (Coordinated Plan). Senior Neighbors, Inc participates in the Specialized Services Operating Assistance Committee and the Consumers Advisory Committee in developing and implementing a community transportation coordination plan.

Transit Improvement Plan (TIP). The TIP is a fiscally constrained three-year planning document that addresses transportation projects and programs including: federal, state and local highways, transit, ridesharing, bike paths and pedestrian facilities. If an item we wish to purchase is not in the TIP, it cannot be funded. The TIP process includes public hearings and public comment periods.

Board Meetings. The Board of Directors holds five meetings per year and the public is invited to attend.

Client Grievance Policy. Clients may register dissatisfaction with the administration of a program, or in the services provided by following the Senior Neighbors, Inc. Client Grievance Policy.

Client Satisfaction Surveys. We conduct client satisfaction surveys on 10 – 25% of persons who use our services. Information gathered from these surveys is used to determine whether any changes need to be made in the provision of our services.

Bilingual Outreach. Senior Neighbors, Inc. provides outreach specifically for area refugees, including the Bosnian, Sudanese, Somali, Bhutanese, Burmese, Syrians, Iraqi, Ethiopian, Afghanistanian and seniors from the Democratic Republic of Congo populations in Kent County.

We submit to the Michigan Department of Transportation annually an application for funding. The application requests funding for both capital and operating assistance. Part of the annual application is a public notice, which includes a 30-day public comment period.

IX. Membership of Non-Elected Committees and Councils

Senior Neighbors does not have Non-Elected Committees or Councils.

Appendix A Employee Annual Education Form

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 the Senior Neighbors, Inc. 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 Ms. Jeffery Gass, Title VI Coordinator.

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

Appendix B Acknowledgement of Receipt of Title VI Plan

I hereby acknowledge the receipt of the Senior Neighbors, Inc.'s 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 or Federal Transit Administration (FTA) Circular 4702.1.B.

_____

Your signature

_____

Print your name

_____

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 in transit services, please provide the following information in order to assist us in processing your complaint and sent it to:

Jeffery Gass, Title VI Coordinator
678 Front Avenue NW Suite 205
Grand Rapids, MI 49504

Please print clearly:

Name:

_____

Address:

_____

City, State, Zip Code:

_____

Telephone Number: _____(home) _____(cell) _____(message)

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: _____

Please list any and all witnesses' names and phone numbers:

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

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

Jeffery Gass, Title VI Coordinator
Senior Neighbors, Inc.
678 Front Avenue NW Suite 205
Grand Rapids, MI 49504

Your signature

Print your 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 the Senior Neighbors, Inc. alleging _____ _____.

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 616-233-0278, or write to me at this address:

Senior Neighbors, Inc.
678 Front Avenue NW Suite 205
Grand Rapids, MI 49504

Sincerely,

Jeffery Gass
Title VI Coordinator

APPENDIX E Letter Notifying Complainant that 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 the Senior Neighbors, Inc. 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,

Jeffery Gass
Title VI Coordinator

APPENDIX F Letter Notifying Complainant that 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 the Senior Neighbors, Inc. 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.

The Senior Neighbors, Inc. has analyzed the materials and facts pertaining to your case for evidence of the city'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 Senior Neighbors, Inc., and/or 2) file a complaint externally with the U.S. Department of Transportation and/or the Federal Transit Administration at

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

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,

Jeffery Gass
Title VI Coordinator

APPENDIX G Samples of Narrative to be included in Posters to be Displayed in Facilities

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of 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).

Senior Neighbors, Inc. is 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 or in Federal Transit Administration (FTA) Circular 4702.1.B. If you feel you are being denied participation in or being denied benefits of the transit services provided by Senior Neighbors, Inc., or otherwise being discriminated against because of your race, color, national origin, gender, age, or disability, you may contact our office at 678 Front Avenue NW Suite 205, Grand Rapids MI 49504.