

SENIOR NEIGHBORS INC.

TITLE VI PLAN

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).

Senior Neighbors, Inc., hereinafter referred to as Senior Neighbors, 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 4702.1B.

This plan was developed to guide Senior Neighbors 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
Email: jgass@seniorneighbors.org

II. Title VI Dissemination

Title VI information posters shall be prominently and publicly displayed in the Senior Neighbors facility and on their revenue vehicles. The name of the Title VI coordinator is posted and available at 678 Front Ave, NW Suite 205 and seniorneighbors.org. Additional information relating to nondiscrimination obligation can be obtained from Senior Neighbors Inc. Title VI Coordinator.

Nondiscrimination information shall be disseminated to Senior Neighbors employees annually (see Appendix A). This information reminds employees of Senior Neighbors policy statement, and of their nondiscrimination responsibilities in their daily work and duties. All employees of Senior Neighbors 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 Senior Neighbors expectations to perform their duties accordingly.

III. Subcontractors and Vendors

All subcontractors and vendors who receive payments from Senior Neighbors 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 Senior Neighbors 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:

- 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 may be filed in writing or by e-mail with Senior Neighbors at the following address:

Senior Neighbors Inc.
678 Front Ave NW Suite 205
Grand Rapids, MI 49504
616-233-0286
616-459-6953
igass@seniorneighbors.org

NOTE: Senior Neighbors 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 180 days from the alleged date of discrimination.

All complaints alleging discrimination based on race, color, or national origin in a service or benefit provided by Senior Neighbors will be directly addressed by Senior Neighbors. Senior Neighbors 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 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.

Senior Neighbors 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, 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.

Once sufficient information for investigating the complaint is received by Senior Neighbors, a written response will be drafted subject to review by the transit's attorney. If appropriate, Senior Neighbors attorney may administratively close the complaint. In this case, Senior Neighbors will notify the complainant of the action as soon as possible.

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: Title VI Investigations, Complaints, and Lawsuits

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

VII. Four Factor Analysis

Senior Neighbors is required to take reasonable steps to ensure meaningful access to their programs and activities by LEP persons. While designed to be a flexible and fact-dependent standard, the starting point is an individualized assessment that balances the following four factors:

- The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or grantee.
- the frequency with which LEP individuals meet the program.
- the nature and importance of the program, activity, or service provided by the program to people's lives; and
- the resources available to the grantee/recipient or agency, and costs.

Factor 1: Number/Proportion of LEP Persons in Service Area

- Include data from sources such as the US Census Bureau's Demographic and Housing Characteristics or American Community Survey
- Include a listing of the counts and percentages of LEP individuals present in your service area by language.
- Identify if any of the LEP languages reach the LEP threshold of 5%, or the Safe Harbor Threshold (1,000 persons).

Senior Neighbors is an agency that works exclusively with people aged 60 and older. Our transportation clients are almost exclusively Kent County residents. It is Senior Neighbor's desire to treat each senior citizen encountered with the respect and dignity they deserve. According to the 2020 American Community Survey conducted by the U.S. Census Bureau, there are 128,080 residents over the age of 60 of the totals of 652,618 Kent County population. The US Census report from 2020 and the Bureau's Demographic and Housing Characteristics and was able to determine that approximately 6.6% or 43,118 of people within the Senior Neighbors service area age 5 and older spoke a language other than English. Of the 43,118 reporting they speak other languages than English, 42% or 18,109 of respondents speak English less than "very well." The Indo-European language comprised the largest non-English speaking language group with 3.7%. The other largest non-English speaking language group was the Asian/Islander language at 2%.

Factor 2: Frequency of Contact with LEP Persons

As part of our outreach and assistance program, Senior Neighbors has reached out to refugee groups in our area. Currently we provide rides through ridelink to several refugee clients who speak a variety of languages including Swahili and Kinyarwanda. The Kent County area has a significant and growing group of Spanish speaking seniors as well as a large growth in refugee, non-English speaking clients. We currently transport several Spanish speaking clients through our county wide Ridelink service. The staff and drivers have contact with LEP individuals several times a week, but Senior Neighbors drivers have had 0 requests for interpreters and/or translated Senior Neighbors documents.

Factor 3: Nature and importance of the program, activity, or service provided by the program in people's lives

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 area of Lowell and Sparta and the suburb of Grandville. Access to the services provided by Senior Neighbors is critical to the lives of many residents in the service area. Many people depend on Senior Neighbors services for access to jobs and for access to essential community services like schools, shopping, and medical appointments. Because of the essential nature of the services and the importance of these programs in the lives of many of the region's residents, there is a need to ensure that language is not a barrier to access.

Factor 4: The resources available to Senior Neighbors and overall costs.

Senior Neighbors uses Certified Languages with an availability of 230+ languages, utilized over the phone. This is charged at a contracted rate of \$1.19 per minute for three way calling. We also use Liaison Linguistics, a local professional interpretation service, for all in-person interpretation requests, the charge is \$35.00 per hour. Family members or volunteers are used if it is agreeable to the client. Training is provided for the transportation staff. Training costs vary depending on the availability of speakers and material.

VIII. Limited English Proficiency (LEP) Plan

Senior Neighbors will use the following guidelines and resources to assist persons with limited English proficiency. Senior Neighbors has the Census Bureau's "I Speak Cards" available at the Senior Neighbor facilities as well as in each vehicle. Although staff may not be able to provide immediate translation assistance, we will utilize the cards to identify language needs. If an interpreter is needed immediately, in person or on the telephone, staff will use "I Speak Cards" to help determine what language assistance is needed. Certified Languages for assistance.

Senior Neighbors has on our webpage the Title VI policy and complaint Procedures.

Senior Neighbors will educate our staff on the following procedures:

1. Understanding the Title VI policy and LEP responsibilities.
2. How to access language assistant services by using the "I speak cards".
3. Document language assistance requests
4. Use of language identification cards
5. How to handle Title VI/LEP complaints.

IX. Public Participation Plan

The Senior Neighbor community and minority outreach plan is based on the following principles:

- Flexibility - The engagement process will accommodate participation in a variety of ways and be adjusted as needed.
- Inclusiveness – Senior Neighbors will proactively reach out to and engage low income, minority and LEP populations from the Senior Neighbor service area.
- Respect - All feedback will be given careful and respectful consideration.
- Initiative-taking and Timeliness - Participation methods will allow for early involvement and be ongoing.
- Clear, Focused and Understandable - Participation methods will have a clear purpose and use for the input and will be described in language that is easy to understand.
- Honest and Transparent - Information provided will be accurate, trustworthy, and complete.
- Responsiveness – Senior Neighbors will respond and incorporate appropriate public comments into transportation decisions.
- Accessibility – Meetings will be held in locations which are fully accessible and welcoming to all area residents, including, but not limited to, low-income and minority members of the public and in locations relevant to the topics being presented and discussed.

As an agency receiving federal financial assistance, Senior Neighbors has made the following community and minority outreach efforts since the last submission of a Title VI program:

Senior Neighbors actively participate in the county human services, coordinated transportation services plan as well as local and state transportation forums. We partner in the Kent County service, Ridelink, provided through Area Agency on Aging.

Senior Neighbors Board of Directors holds quarterly meetings that the public is invited to attend. These meetings are held in the evening to accommodate people that cannot attend during daytime hours.

Senior Neighbors conducts client satisfaction surveys on 10-25% of clients who use our service. Information gathered from these surveys is used to determine whether any changes need to be made in the provision of our services.

Senior Neighbors has a complaint procedure that is available to the public at any time and is also available to the public via our website at seniorneighbors.org

X. Membership of Non-Elected Committees

Senior Neighbors will publicly advertise and post on our website to encourage minority participation on non-elected committees such as the LAC (Local Advisory Committee). The LAC is promoting organically to increase the diversity on the LAC Committee.

| Body | Caucasian | Latino | African American | Asian American | Native American |
|--------------------------|-----------|--------|------------------|----------------|-----------------|
| Population | 82.3% | 11.3% | 12.5% | 4.3% | 1.2% |
| Local Advisory Committee | 100% | 0% | 0% | 0% | 0% |

XI. Equity Analysis

If Senior Neighbors constructs a facility, such as a vehicle storage facility, maintenance facility, operations center, or other building, it will do a Title VI equity analysis following the procedures listed below:

The Senior Neighbors shall complete a Title VI equity analysis during the planning stage regarding where a project is located or sited to ensure the location is selected without regard to race, color, or national origin.

When evaluating locations of facilities, agencies should give attention to other facilities with similar impacts in the area to determine if any cumulative adverse impacts might result.

If Senior Neighbors determines that the location of the project will result in a disparate impact based on race, color, or national origin, Senior Neighbors may only locate the project in that location if there is a substantial legitimate justification for locating the project there, and where there are no alternative locations that would have a less disparate impact based on race, color, or national origin.

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 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 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 Plan

I hereby acknowledge the receipt of Senior Neighbors 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 transit services on the basis of race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1B.

Employee signature

Print 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 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:

Please list all witnesses' names and phone numbers:

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?

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

Title VI Coordinator
Jeff Gass
678 Front Ave NW Suite 205
616-233-0286
616-459-6953
jgass@seniorneighbors.org

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 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 616-459-6019 or write to me at this address.

Sincerely,

Title VI Coordinator
Jeff Gass
Senior Neighbors, Inc.
678 Front Ave. NW Suite 205
616-233-0286
616-459-6953
jgass@seniorneighbors.org

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 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,

Title VI Coordinator
Jeff Gass
678 Front Ave NW Suite 205
616-233-0286
616-459-6953
jgass@seniorneighbors.org

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 AGENCY 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.

AGENCY 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 AGENCY, 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,

Title VI Coordinator
Jeff Gass
678 Front St NW Suite 205
616-233-0286
616-459-6953
jgass@seniorneighbors.org

APPENDIX G

Samples of Narrative to be included in Posters to be Displayed in Revenue Vehicles and Facilities

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Senior Neighbors is committed to ensuring that no person is excluded from participation in or denied the benefits of its transit services based on race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1B. If you feel you are being denied participation in or being denied benefits of the transit services provided by Senior Neighbors because of your race, color, or national origin, you may contact our office at:

Title VI Coordinator
Jeff Gass
678 Front Ave NW
616-233-0286
616-459-6953
jgass@seniorneighbors.org

For more information, visit our website at seniorneighbors.org.