



SENIORS'
RESOURCE
CENTER

Title VI

Plan

May, 2016

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I. Statement of Client Rights under Title VI

The Seniors' Resource Center, Inc. (SRC) operates its services, programs, and activities without regard to race, color, national origin (ancestry), religion (creed), gender, gender expression, age, disability, marital status, sexual orientation, military status, or any other status protected by applicable local, state, or federal law. SRC abides by the provisions of all applicable civil rights laws and regulations, including without limitation: Title VI of the Civil Rights Act of 1964; the Americans with Disabilities Act (ADA); and the Older Americans Act (OAA). For more information on SRC's civil rights program, and the procedures to file a complaint, contact SRC's Administrative Department at (303) 238-8151. Or visit our administration office at 3227 Chase Street, Denver, CO 80212.

Title VI Notice to the Public

Seniors' Resource Center

- The Seniors' Resource Center 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 the City of USA.
- For more information on the Seniors' Resource Center's civil rights program, and the procedures to file a complaint, contact SRC's Department of Administration at (303) 238-8151, visit our administrative office at 3227 Chase Street, Denver, CO 80212 For more information, visit www.SRCaging.org.
- For Title VI claims of discrimination on the basis of race, color, or national origin, a person may submit the complaint directly to the Federal Transit Administration (FTA), at the FTA Region 8 Office, Attn: Civil Rights Officer, 1961 Stout Street, Suite 13301, Denver, CO 80909
- If information is needed in another language, contact (303-238-8151).

Si se necesita la información en otro idioma llame al (303) 238-8151 de extensión 123.

Notice Locations

SRC's Title VI Notice is posted in English and Spanish in the following locations:

- ◆ SRC's website at www.SRCaging.org
- ◆ SRC's headquarters at 3227 Chase Street, Denver, CO 80212, in the reception area.
- ◆ SRC's Evergreen Site, 5120 Highway 73, Evergreen, CO 80439
- ◆ SRC's SouthWest Site at 10181 W Bowles Avenue, Unit B, Littleton, CO 80127
- SRC's STARR Center facility, 7815 W 16th Avenue, Lakewood, CO 80214

II. Title VI Complaint Procedures and Complaint Form

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by the Seniors' Resource Center (hereinafter referred to as "SRC") may file a Title VI complaint by completing and submitting the organization's Title VI Complaint Form. The Seniors' Resource Center investigates complaints received no more than 180 days after the alleged incident. SRC will process complaints that are complete.

Once the complaint is received, the Seniors' Resource Center will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgment letter informing her/him whether the complaint will be investigated by our office.

The Seniors' Resource Center has 60 days to investigate the complaint. If more information is needed to resolve the case, Seniors' Resource Center may contact the complainant. The complainant has fourteen (14) business days from the mailing date of the letter to send the requested information to the investigator assigned to the case.

If the investigator is not contacted by the complainant or does not receive the additional information within fourteen (14) business days, Seniors' Resource Center can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

After the investigator reviews the complaint, she/he will issue one of two letters to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. An LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member or other action will occur. If the complainant wishes to appeal the decision, she/he has fourteen (14) days after the date of the letter or the LOF to do so.

For Title VI claims of discrimination on the basis of race, color, or national origin, a person may submit the complaint directly to the Federal Transit Administration (FTA), at the FTA Region 8 Office, Attn: Civil Rights Officer, 1961 Stout Street, Suite 13301, Denver, CO 80909.

SRC's Title VI Complaint Form is set forth on the following pages. SRC's non-discrimination policy includes Title VI's prohibition against discrimination on the basis of race, color, and national origin.

**Seniors' Resource Center
Title VI Complaint Form**

Section I:

Name: _____

Mailing Address: _____

Telephone (Home): (____) _____

Telephone (Work): (____) _____

Telephone (Mobile): (____) _____

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

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

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 use the back of this form.

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:

Seniors' Resource Center, Inc.

President/CEO

3227 Chase Street

Denver, CO 80212

III. List of Investigations, Complaints, and Lawsuits

Under the requirements of Title VI, SRC maintains a list of any of the following activities related to an allegation of discrimination on the basis of race, color, or national origin (ancestry)(Title VI):

- Complaints naming the Seniors' Resource Center
- Active investigations conducted by the Federal Transit Administration (FTA) and entities other than the FTA
- Lawsuits

At this time, SRC has no complaints, investigations, or lawsuits to report. However, the following is the form that will be updated as needed and available SRC's Administrative Offices at 3227 Chase Street, Denver, CO 80212. This list shall include the date the relevant investigation, lawsuit, or complaint was filed; any actions taken by SRC in response, or the final findings related to the investigation, lawsuit, or complaint. This list shall be included in the Title VI Plan that SRC is required to submit to the FTA every three years.

IV. Public Participation Plan

Terri Wager, Sr. Vice President, Administrative Services, who reports directly to the organization's President/CEO, has been appointed SRC's Title VI Coordinator. Ms. Wager is responsible for coordinating investigation and resolution of complaints related to services provided by the Seniors' Resource Center. Jan Perko, Manager, Human Resources, coordinates hiring related activities of the Plan. Comments regarding our Title VI Plan may also be made directly to either Ms. Wager or Ms. Perko by contacting the Seniors' Resource Center's Department of Administration at 3227 Chase Street, Denver, CO 80212 or by telephone contact at 303-238-8151.

Outreach Plan

Throughout the year, SRC staff members conduct outreach activities (directly to those client populations to whom we provide service as well as to community groups, professional associations, etc.) in various communities in our service areas and attend local government meetings. The purpose of these activities and presentations is to raise the level of awareness of the availability of our services and programs, and to engage with residents, governing bodies, and community groups about the needs of some in their communities and how best to address them. SRC is committed to reaching and serving members of minority groups or under-represented populations. Each year, SRC reviews demographic information on its clients, including new clients. The results of this review helps guide SRC's future outreach efforts.

As a nonprofit human services provider, SRC seeks feedback on its mission services from clients and other members of the community. SRC utilizes Advisory Committees and an engaged volunteer Board of Directors to assist us in evaluating and planning service design and implementation.

For information regarding SRC's outreach plans to limited English proficient populations, see the following Sections V and VI.

LIMITED ENGLISH PROFICIENCY PLAN

Seniors Resource Center

I. INTRODUCTION

This Limited English Proficiency (LEP) Plan, for **the Seniors' Resource Center, Inc. (SRC)** has been developed in response to federal requirements included under Section 601 of Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), which provides that 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."

Federal Executive Order No. 13166, issued in August 2000 by President Clinton, "Improving Access to Services for Persons with Limited English Proficiency," was created to "... improve access to federally conducted and federally assisted programs and activities for persons who, as a result of national origin, are limited in their English proficiency (LEP)..." President Bush affirmed his commitment to Executive Order 13166 through a memorandum issued on October 25, 2001, by Assistant Attorney General for Civil Rights, Ralph F. Boyd, Jr. and Acting Assistant Attorney General, Loretta King directed a strengthening of enforcement of Title VI in a memorandum dated July 10, 2009.

As a sub-recipient of funds from the Federal Transit Administration (FTA), through the Colorado Department of Transportation (CDOT), this Limited English Proficiency (LEP) Plan for **the Seniors' Resource Center, Inc.** has been developed to ensure compliance with Federal LEP regulations. It includes an assessment of the limited English proficiency needs of our area, an explanation of the steps we are currently taking to address these needs, and the steps we plan to take in the future to ensure meaningful access to our transit programs by persons with limited English proficiency.

II. LIMITED ENGLISH PROFICIENCY NEEDS OF AREA

The *Four-Factor Analysis* developed by the FTA requires that information be included in LEP Plans regarding the number and percentage of LEP persons in our area, and the nature, frequency and importance of the contact we have, with LEP persons, in providing transit services. Each of these elements is addressed below.

Number and Percentage of LEP Persons in Our Area

Permanent Population

U.S. Census Data

The U.S. Census provides information to assist in estimating the number of limited English speakers. While the 2010 Census will provide up-to-date data, that information is not yet available. However, 2008 estimates are available for large population counties. Therefore, for Jefferson and Adams Counties, 2008 estimates are used. For Clear Creek, Gilpin and Park Counties, however, only year 2000 data was available. Table 1 presents information on *Language Spoken at Home by Ability to Speak English* for Jefferson, Adams, Clear Creek, Gilpin and Park Counties.

As the table shows, the number and percentage of LEP persons in the permanent population for the Seniors Resource Center (SRC) service area is extremely low in Clear Creek, Gilpin and Park Counties. However, in Jefferson and Adams Counties, there is a relatively large number of people who have difficulty speaking English, even though the percentages are low. Of the LEP individuals, those speaking Spanish is by far the largest group. However, especially in Jefferson County, there are substantial numbers of LEP individuals speaking other languages.

School District and Other Local Data

U.S. Census data indicates a need to respond to individuals in our service area who have difficulty with English, especially in Jefferson and Adams Counties. Given the recent data (2008 estimates) for Jefferson and Adams Counties, where the larger numbers of LEP individuals are located, for this LEP Plan, additional local contacts were not made to clarify the need among the permanent population. (This is not accurately reflective of the over 60 year old population that is the primary constituency of SRC. SRC will research the over 60 population for LEP percentages, but continues to address the primary LEP Spanish speaking population.)

Visitors

There are many visitors to our study area, and while they are less likely to use our service, which focuses on the elderly and persons with disabilities, there may be visitors who would like to ride our service. Spanish language literature and staff are available if the need should arise. SRC funding is for county residents but visitors may travel as an escort or companion

Summary

There are a substantial number of LEP individuals in Jefferson and Adams Counties. There are only a small number of LEP individuals in the other counties of our service area. While most of those who have difficulty with English are Spanish speakers, a variety of other languages are spoken as well, especially in Jefferson County. Some of these individuals may want to ride our service. SRC will use other resources if needed to address other than Spanish language requests.

TABLE 1 - Individuals Speaking English "Not Well" or "Not at All"

Data Category	Adams County		Clear Creek County		Gilpin County		Jefferson County	
	Total #	%	Total #	%	Total #	%	Total #	%
Total Population (5 years old & older)	396,285	100%	8,630	100%	5,001	100%	501,761	100%
Population Speaking English "Not Well" or "Not at All"	31204	8%	28	0%	29	1%	7411	1%
Population Speaking English "Not Well" or "Not at All"								
Spanish	26402	85%	28	100%	29	100%	4594	62%
Other Indo-European	1313	4%	0	0%	0	0%	957	13%
Asian and Pacific Islander	3222	10%	0	0%	0	0%	1728	23%
Other	267	1%	0	0%	0	0%	132	2%
Total	31204	100%	28	100%	29	100%	7411	100%

Source: U.S. Census American Community Survey 2007-2011 estimates, population 5 years old and older, speaking another language in the home, who speak English "Not well" or "Not at All."

Nature, Frequency and Importance of LEP Contact

The nature and frequency of LEP contact is moderate for specialized transportation services in Jefferson and slightly higher in Adams Counties. The largest frequency of contact is from the Spanish speaking population, an average of 2-3 call per week. Spanish speaking Intake staff is able to handle these contacts. The SRC Rider Guide is available in Spanish.

Recognizing the importance of any LEP contact, strategies to address the need involving other language have been developed and will continually be reviewed, and improved where needed. SRC has worked with the Mountain States Employers Council who have recommended using Bridge Languages services when needed. DRCOG has a refugee outreach program which SRC is also involved with.

CURRENT LEP EFFORTS

The numbers and percentages of LEP persons are significant in Jefferson and Adams Counties. As a specialized transportation provider we are committed to addressing the on-going need to service LEP individuals. Therefore, in recent years we have undertaken the following efforts; SRC has transportation information available in Spanish for its transportation programs in all counties served. SRC employs bi-lingual Spanish speaking staff to assist Spanish speaking clients. SRC has actively participated in regional outreach to LEP populations through booths at local fairs and events. As stated previously, SRC take this mandate seriously and has in place the above referenced systems to connect with local translators should the need arise.

PLAN FOR THE FUTURE LEP EFFORTS

Given the current and potential future need to respond to individuals with Limited English proficiency our LEP Plan includes the elements identified below.

Identifying LEP Persons Who Need Language Assistance

In order to identify potential future LEP needs with respect to our transit service we will undertake the following:

- Review Census updates as they become available;
- Periodically review perceived LEP needs with drivers and other first-line staff;

- Make periodic contacts with other community agencies that may know of LEP persons or groups.

Language Assistance Measures

As the need arises, we will consider the following to respond to LEP needs:

- Continue to use Spanish versions of marketing materials, customer complaint forms, public notices, and related information, as appropriate;
- Continue to hire Spanish-speaking customer service staff and/or drivers;
- Obtain copies of CDOT's "Basic Spanish for Transit Employees" and distribute to drivers and customer service staff, as appropriate;
- Become familiar with web-based **AltaVista Babel Fish** for phrase translation into or from multiple languages;
- Become familiar with Language Line Services at <http://www.languageline.com>
- Identify other community resources such as agencies serving LEP persons which may have resources to share.

Staff Training

Similarly, as the need arises, we will consider the following staff training topics:

- Federal LEP requirements, your LEP Plan and Title VI;
- Documenting language assistance requests;
- Use of any of the language assistance measures as described above.

Outreach Efforts

Similarly, as the need arises, we will consider the following staff training topics:

- Identify agencies in our area that may serve LEP populations
- Provide information on your services to them, as appropriate

- Provide opportunities for LEP participation at public meetings, through advertising and conduct of meetings, as appropriate

Monitoring and Updating Plan

We will monitor and update this plan every 2-3 years, as needed. This will include:

- Reviewing our LEP Plan with staff and make adjustments, as needed
- Pay particular attention to demographic changes in our area and to any LEP-related complaints we receive.

Disseminating Our LEP Plan

- Have copies of our plan available to give to agencies serving LEP populations in our area and or for individual requests;
- Post our plan on your website;

VI. Language Assistance Plan

1. *How Will You Identify LEP Persons Who Need Language Assistance?*

Individuals seeking services contact SRC directly, or are referred by someone who assists them in the process (i.e. family member, case worker, advocate). Prospective riders register through our Intake Team, who have bilingual Spanish members. SRC's RouteMatch database identifies language preference for all riders.

2. *How Will You Identify Language Assistance Measures?*

If an individual needs language assistance other than what SRC can provide through in-house resources, SRC utilizes the resources available through the Denver Regional Council of Governments for access to translation services.

3. *How Will Your Staff Be Trained?*

Reservationist Training: The Call Center includes team members who are Spanish bilingual reservationists.

Driver Training: SRC Driving personnel include those who are Spanish bilingual. Driver meetings address the LEP issue as needed as determined by changes to the Plan, any concerns that may have been expressed by a rider, etc.

4. *What Will Be Your Outreach Efforts?*

Our most successful strategies for targeting our services to low-income, low-income minority, frail, and/or isolated seniors (many of whom are LEP) continue to be our partnerships with organizations or agencies who serve these populations.

In addition to conducting presentations to area organizations, SRC routinely participates in community events such as health fairs and other community events. The SRC Marketing team as well as the SRC Transportation Services Director (or others as assigned) annually attend various community based events. Examples include but are not limited to the Adams County Senior Fair, the Jefferson County Senior Law Day, the Arapaho County Council on Aging. Transportation presentation requests occur almost monthly. SRC works closely with county based agencies and medical office throughout the metro area and receives numerous referrals. Transportation program staff participate on metro area LCC, and the Director sits on the Board of the Denver Regional Mobility and Access Council whose vision is "mobility and access for all".

5. What Is Your Monitoring and Updating Plan?

SRC will monitor and update this plan as needed and not less than once per year. This will include:

- Reviewing our LEP Plan with staff and make adjustments as needed.
- Monitoring demographic changes.
- Paying attention to any LEP-related complaints.

6. How Will You Disseminate Your LEP Plan?

- Copies of SRC's LEP plan are available to the many agencies and organizations with whom we partner that serve LEP populations in our service area.
- We have posted our plan on our website.

VII. Monitoring Sub-recipients for Title VI Compliance

SRC requires that all of its sub-recipients of federal grant funds comply with Title VI of the Civil Rights Act of 1964. A sub-recipient is defined in the OMB Super Circular, 2 CFR Part 200 (<https://federalregister.gov/a/2013-30465>) as “a non-Federal entity that receives a sub-award from a pass-through entity [SRC] to carry out part of a Federal program; but does not include an individual that is a beneficiary of such program.”

Specifically, SRC requires:

- The following clauses in its Sub-recipient Agreements with sub-recipients:

Sub-awardee (or sub-recipient) agrees to comply with all applicable civil rights laws and regulations, in accordance with federal directives, except to the extent that the Federal Government determines otherwise in writing. These shall include, but are not limited to, the following:

1. Nondiscrimination – Title VI of the Civil Rights Act. Sub-awardee agrees to comply, and assures the compliance of each subcontractor or third party contractor with the provisions prohibiting discrimination on the basis of race, color, or national origin of Title VI of the Civil Rights of 1964, as amended, 42 USC §§2000d et seq., and with DOT regulations, “Nondiscrimination in Federally-Assisted Programs of the Department of Transportation – Effectuation of Title VI of the Civil Rights Act,” 49 CFR Part 21. Except to the extent FTA determines otherwise in writing, the Contractor agrees to follow all applicable provisions of the most recent edition of the FTA Circular 4702.1A, “Title VI and Title VI-Dependent Guidelines for Federal Transit Administration Grantees.” And any other applicable federal directives that may be issued.

- That each sub-recipient agrees to allow SRC to verify its compliance with all applicable Title VI requirements upon SRC’s request. Such verification may be conducted through a review of sub-recipient’s Title VI documents and procedures or an on-site visit.

VIII. Board Approval of Title VI Plan

In a meeting held on June 15, 2016 Board of Directors approved and adopted this Title VI Plan.

Title VI Notice to the Public

Seniors' Resource Center

- The Seniors' Resource Center 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 the City of USA.
- For more information on the Seniors' Resource Center's civil rights program, and the procedures to file a complaint, contact SRC's Department of Administration at (303) 238-8151, visit our administrative office at 3227 Chase Street, Denver, CO 80212 For more information, visit www.SRCaging.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
- If information is needed in another language, contact (303-238-8151).

*Si se necesita la información en otro idioma llame al (303)
238-8151 de extensión 123.*

Título VI Aviso al Público

Centro de Recursos para las personas Mayores

Opera sus programas y servicios, sin distinción de raza, color y origen nacional, de conformidad con el Título VI de la Ley de Derechos Civiles. Cualquier persona que cree que él o ella ha sido perjudicada por cualquier práctica discriminatoria ilegal bajo el Título VI, puede presentar una queja con la Ciudad de U.S.A.

- *Para obtener más información sobre El Centro de Recursos para las personas mayores puede contactar al programa de derechos civiles, y los procedimientos para presentar una queja, contacte SRC Departamento de Administración al (303) 238-8151, visite nuestra oficina administrativa a la siguiente direccion 3227 Chase St., Denver, CO 80212.*
- *Para obtener más información, visite www.SRCaging.org. Un demandante puede presentar una queja directamente con la Administración Federal de Transporte mediante la presentación de una queja ante la Oficina de Derechos Civiles, Atención: Coordinador del Programa Título VI, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.*
- *Si necesita la información en otro idioma, llame al (303-238-8151). Extension 123.*