

## **Title VI Plan**

**Agency Name: Gratiot County Commission on Aging**

**Date Adopted: May 28, 2009 Revised February 2019**

### **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).

Gratiot County Commission on Aging is committed to ensuring that no person is excluded from participation in, or denied the benefits of its services, including 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 the Gratiot County Commission on Aging in its administration and management of Title VI-related activities.

#### **Title VI Coordinator Contact Information**

**Jennifer Cook jcook@gratiotmi.com (989) 875-5246**

### **II. Title VI Information Dissemination**

Title VI information posters shall be prominently and publicly displayed in the Gratiot County Commission on Aging facility. The name of the Title VI coordinator is available on the Gratiot County Commission on Aging website, at [www.gratiotmi.com](http://www.gratiotmi.com). Additional information relating to nondiscrimination obligation can be obtained from the Gratiot County Commission on Aging Title VI Coordinator.

Title VI information shall be disseminated to Gratiot County Commission on Aging employees annually via the Employee Education form (see Appendix A) in payroll envelopes. This form reminds employees of the Gratiot County Commission on Aging 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 Gratiot County Commission on Aging 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. Subcontractors and Vendors**

All subcontractors and vendors who receive payments from Gratiot County Commission on Aging 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 nondiscrimination 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 Gratiot County Commission on Aging 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 30 days from the date of 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 with Gratiot County Commission on Aging at the following address:

Gratiot County Commission on Aging  
515 S. Pine River St., Ithaca MI 48847

NOTE: Gratiot County Commission on Aging 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 Gratiot County Commission on Aging will be directly addressed by Commission on Aging. Gratiot County Commission on Aging shall also provide appropriate assistance to complainants, including those persons with disabilities, or who are limited in their ability to communicate in English. Additionally, Gratiot County Commission on Aging shall make every effort to address all complaints in an expeditious and thorough manner.

A letter 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?**

Gratiot County Commission on Aging 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 Gratiot County Commission on Aging, 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, 5<sup>th</sup> Floor – TCR  
1200 New Jersey Ave, SE  
Washington DC 20590

NOTE: Gratiot County Commission on Aging has never had a transit-related Title VI investigation, complaint, or lawsuit.

**Gratiot County Commission on Aging has not received any transit related Title VI lawsuits, complaints, or investigations.**

## **VI. Limited English Proficiency (LEP) Plan**

Gratiot County Commission on Aging conducted FTA Four Factor analysis and developed an LEP Plan. The plan uses "I Speak" cards and other resources to ensure equal opportunity for LEP individuals.

### **FOUR FACTORS ANALYSIS**

- 1. Determine the number of LEP persons eligible to be served or likely to be encountered.**

The 2010 US Census reported a total population in Gratiot County, Michigan, of individuals five years old and older of 42,476.

When reporting on the ability to speak English, the 2010 US Census reported 40,175 county residents spoke only English and 2,301 residents spoke a language other than English.

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When reporting on the ability to speak English, the 2010 US Census reported 208 individuals 65 years and older spoke English less than “very well”. This represents 0.5% of the population.

**2. Determine the frequency with which LEP persons come in contact with the program.**

We interviewed staff and drivers to assess the frequency at which LEP individuals come in contact with the agency. Minimal numbers of LEP individuals, primarily Hispanic, have been identified as having come in contact with our agency.

**3. Determine the importance of the service to peoples’ lives.**

The Gratiot County Commission on Aging provides transportation services to senior citizens, disabled and low-income individuals 60 years and older for medical, groceries, hair appointments, and social service appointments. This service is very important to their lives.

**4. Determine the resources available and cost.**

World map is used to help identify LEP individuals. The Gratiot COA will utilize Certified Languages International for non-English speaking persons and/or the TTY Line for hearing impaired persons. The rates are enclosed.

**Policy:** The Gratiot County Commission on Aging shall provide needed accommodations, accurate and timely language assistance and effective communication to persons with Limited English Proficiency (LEP), communication challenges, visual impairments, mobility impairments, and/or similar impairments to ensure equal access to services. The procedures outlined below will ensure that services are accessible and information is communicated by staff that have demonstrated competence in cultural sensitivity to all persons in their language of choice, and at no cost to the client.

**Definition:** Accommodations: Internal or external resources needed to ensure the client is afforded meaningful access to services (i.e. interpreter/translation services, ramps, Braille, etc.).

**Client:** Current and prospective clients, family and other interested persons.

**Cultural Competence:** A set of congruent behaviors, attitudes, beliefs, practices and procedures that come together in a system, agency, or among professionals to enable that the system, agency, or those professionals work effectively in cross-cultural situations. The word culture implies the integrated patterns of human behavior that include thoughts, communications,

actions, customs, beliefs, values, and institutions of racial, ethnic, religious, or social groups. The word competence implies having the capacity to function within the context of culturally integrated patterns of human behavior defined by the group.

Limited English Proficiency (LEP): The inability to speak, read, write, or understand English at a level that permits effective interaction with health care providers. LEP is the responsibility of providers of health and social services who receive Federal Financial Assistance from the U.S. Department of Human Services.

**Assessment:** The Gratiot County Commission on Aging will identify the non-English languages that are most commonly encountered other than English by estimating the number of LEP persons that are eligible for services. This assessment will be completed by obtaining information gathered by Region VII Area Agency on Aging, consumer data from client files. Specific language needs will be recorded in the client files. The point of contact in the program or activity where language assistance is likely to be needed will be identified as well as the resources that will be needed to provide effective language assistance, the location and availability of these resources, and the arrangements that must be made to access these resources in a timely fashion.

**Procedure:** The Gratiot Commission on Aging will utilize Certified Languages International for non-English speaking persons and/or the TTY Line for hearing impaired persons. Whenever an interpreter is needed for ongoing services, contact will be made with Languages International to locate an identified interpreter to ensure that confidentiality is preserved. Physical access to services will be guided by the specifications set forth by the Americans with Disabilities Act.

**Use of Family and Friends:** Family members or friends of the LEP person will not be used as interpreters unless specifically requested by that individual after an offer of an interpreter has been made by the Commission on Aging. Such an offer and the response of the individual to the offer will be documented in the client file. Whenever an LEP person refused the offer of an interpreter and prefers to use a family member or friend, the documentation must include the name, relationship, and confirmation that the individual is not a minor. Documentation must include a brief statement of what the interpreter helped to communicate.

If an LEP person elects to use a family member or friend, but the Commission on Aging suspects that the use of this family member or friend could compromise the effectiveness of services or violate the LEP person's confidentiality, it may be suggested that a trained interpreter sit in on the encounter to ensure accurate interpretation. The Commission on Aging will ensure that all volunteer interpreters and/or staff are competent to provide interpretative services. The Commission on Aging staff shall under no circumstances ask a person to bring their own interpreter, or use another client to interpret.

**Written Materials:** Written materials will be translated for each LEP group of 5% or 1000 (whichever is less) of the eligible population for items such as application forms, enrollment

forms, letters or notices about eligibility or any change in benefits, medical or discharge information. For each language group with fewer than 100 persons, the Commission on Aging will provide written notice of the right to receive oral interpretation of written materials in the primary language of the group and will be responsible for the dissemination and translation of the written materials.

**Availability of Interpreter Services and Materials Translated in Other Languages:**

The Commission on Aging will ensure that notices are posted in all entrances regarding the availability of interpreter services and available material in large print and/or translated in other languages for LEP persons. The notice will clearly state that the services are available at no cost to the current or prospective client, family, and interested persons. It will also inform persons that forms that are commonly utilized will be orally communicated to the current and prospective client, family, and interested persons in their preferred, native language, and will describe how to request an interpreter in each language most commonly encountered other than English. The Commission on Aging will ensure that interpreters and bilingual staff can demonstrate bilingual proficiency.

**Training and Compliance:** The Commission on Aging will train all of its new employees during orientation and all employees who have client contact regarding the LEP, Accommodations and Cultural Competency policy and procedures on a regular basis. A training registry will record the names and dates of employees training. Employee training should include, at a minimum, that the individual a) can comprehend and incorporate the cultural diversity of the catchment area, b) appropriately record primary language and accommodation needs in the demographic record, c) demonstrate a working knowledge of the variety of assistive technology, services and resources available to accommodate the needs of individuals, d) seeks to assist persons with LEP or need of accommodations in a respectful manner and treats assistive devices as an extension of the body of the person with the disability and maintains appropriate physical boundaries, e) is knowledgeable regarding how to access translated materials, Braille documents, and/or other assistive devices available, f) is knowledgeable regarding procedures for accessing interpretation services for non-English speaking and/or sign language persons and g) is able to identify clients who may have an unmet need to assistive technology and/or resources and is able to link them to appropriate services and supports with the consent of the client.

**Monitoring:** The Commission on Aging will monitor compliance annually by completing the following: a) assure that staff is knowledgeable about the LEP, Accommodations and Cultural Competency policy and procedures and how to implement them, b) review the current LEP makeup of Gratiot County, c) assess the current communication needs of LEP applicants and clients, d) confirm that resources for assistance are still current and viable, and e) assess whether existing assistance is meeting the needs of such persons.

**VII. Community Outreach**

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

Gratiot County Commission on Aging has engaged the public in its planning and decision making processes, as well as its marketing and outreach activities. Between 2009- 2013, the public was invited to participate in these activities:

Participates in Gratiot County Coordinated Public Transit-Human Services Transportation Plan process.

Participates in City of Alma Dial-A-Ride Coordination Committee

Board Meetings: The Board of Directors holds monthly meetings and the public is invited to attend.

Regular News Releases

Numerous displays

**Table Depicting Membership of Committees, Councils, Broken Down by Race**

| BODY                  | CAUCASIAN | LATINO | AFRICAN AMERICAN | ASIAN AMERICAN | NATIVE AMERICAN |
|-----------------------|-----------|--------|------------------|----------------|-----------------|
| POPULATION            | 88.54%    | 5.6%   | 5.5%             | 0.26%          | 0.1%            |
| GRATIOT CO. COA BOARD | 100%      | 0%     | 0%               | 0%             | 0%              |

The Gratiot County Commission on Aging Board has had minorities in the past. As openings occur through the County, the position is open to the public through the local media for participation of minorities and English proficient population.

**VIII Title VI Equity Analysis**

The Gratiot County Commission on Aging is not planning for a facility construction at this time. In the future, the Gratiot County Commission on Aging will comply with the requirements of the Title VI Equity Analysis.

## 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 Gratiot County Commission on Aging 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 **Jennifer Cook** [jcook@gratiotmi.com](mailto:jcook@gratiotmi.com) (989)875-5246.

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**

**Acknowledgment of Receipt of Title VI Plan**

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

\_\_\_\_\_  
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 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.” If you feel you have been discriminated against any service, including transit services, please provide the following information in order to assist us in processing your complaint and send it to:

Address Here

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: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_



**Appendix D**

**Letter of Acknowledging Receipt of Compliant**

Today's Date

Ms. Jo Doe  
1234 Main St.  
Clarksville, TN 37040

Dear Ms. Doe:

This letter is to acknowledge receipt of your complaint against the Gratiot County Commission on Aging 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 calling (989) 875-5346, or write to this address.

Sincerely,

**Jennifer Cook**  
Title VI Coordinator  
**Gratiot County Commission on Aging**  
**515 S Pine River St.**  
**Ithaca MI 48847**

**Appendix E            Letter Notifying Complainant that the Complaint Is Substantiated**

Today's Date

Ms Jo Doe  
1234 Main St.  
Clarksville, TN 37040

Dear Ms Doe:

The matter referenced in your letter of \_\_\_\_\_(date) against the Gratiot County Commission on Aging 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,

**Jennifer Cook**  
Title VI Coordinator  
**Gratiot County Commission on Aging**  
**515 S Pine River St.**  
**Ithaca MI 48847**

## **Appendix F Letter Notifying Complainant that the Complaint is Not Substantiated**

Today's Date

Ms Jo Doe  
1234 Main St.  
Clarksville, TN 37040

Dear Ms Doe:

The matter referenced in your complaint of \_\_\_\_\_(date) against the Gratiot County Commission on Aging alleging \_\_\_\_\_ has been investigated.

The results of the investigation did not indicate that the provisions of Title VI of the Civil Right 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 Gratiot County Commission on Aging 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 Gratiot County Commission on Aging, and/or 2) file a complaint externally with the U.S. Department of Transportation and/or Federal Transit Administration at:

Federal Transit Administration Office of Civil Rights  
Attention: Title VI Program Coordinator  
East Building, 5<sup>th</sup> 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,

**Jennifer Cook**  
Title VI Coordinator  
**Gratiot County Commission on Aging**  
**515 S Pine River St.**  
**Ithaca MI 48847**

## **Appendix G Samples of Narrative To Be Included in Posters To Be Displayed in Revenue Vehicles and Facilities**

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Gratiot County Commission on Aging is committed to ensuring that no person is excluded from participation in, or denied the benefits of its services, including transit services, on the basis of race, color, or national origin, as protected by Title VI Federal Transit Administration (FTA) Circular 4702.1.B. **If you feel you are being denied participation in or being denied benefits of services, including transit services, provided by Gratiot County Commission on Aging; or otherwise being discriminated against because of your race, color, or national origin, gender, age, or disability, you may contact our office’s Title VI Coordinator, Jennifer Cook , at [jcook@gratiotmi.com](mailto:jcook@gratiotmi.com) or at 989-875-5246.**

For more information, visit our website at [www.gratiotmi.com](http://www.gratiotmi.com).