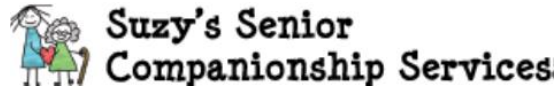




Suzy's Senior Companionship Services

TITLE VI PLAN Non-Discrimination in the Federal Transit Program

August 2020



Suzy's Senior Companionship Services

The Agency affirms:

1. Title VI of the Civil Rights Act of 1964 prohibits discrimination in federally assisted programs. Title VI was amended by the Civil Rights Restoration Act of 1987 (P.L. 100-259), effective March 22, 1988, which added Section 606, expanding the definition of the terms "programs or activities" to include all of the operations of an educational institution, governmental entity, or private employer that receives federal funds if any one operation receives federal funds.
2. Suzy's Senior Companionship Services is a Non-profit entity. It is the policy of Suzy's Senior Companionship Services to ensure compliance with Title VI of the Civil Rights Act of 1964 and all related statutes or regulations in all programs and activities so administered.
3. The Suzy's Senior Companionship Services Executive Director functions as its Title VI Coordinator and is granted the authority to administer and monitor the Title VI Plan as promulgated under Title VI of the Civil Rights Act of 1964 and any subsequent legislation.
4. Suzy's Senior Companionship Services will take all steps to ensure that no person shall, on the grounds of race, color, or national origin, be excluded from participation in, or be denied the benefits of, or be subjected to discrimination under any program or activity of the Agency.
5. The Agency recognizes the need for annual Title VI training for Agency personnel.

Suzy Larsen
Executive Director
Suzy's Senior Companionship Services

Date

UTA Compliance/Monitoring Review and Training

Title VI Staff Training Process/Description

All SSCS staff and volunteers will be trained either annually or as newly hired staff/volunteers on Title VI. Training will include the following documents:

- Non-discrimination poster
- Title VI complaint form
- Complaint log
- LEP
- Title VI brochure

SSCS will utilize UTA staff to assist with trainings if needed. Affidavits will be signed when training is completed and filed as part of the Title VI program documentation.

Compliance and Monitoring Description

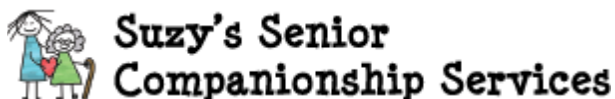
Suzy's Senior Companionship Services agrees to participate in on-site reviews and cooperate with Compliance Staff throughout the review process.

In conducting on-site reviews, the UTA Compliance Officer looks for the following:

- Clearly displayed Title VI posters with the required information (in vehicles and in public spaces)
 - Description of Title VI
 - Explanation of how to obtain Title VI information
 - Explanation of how to file a complaint
 - Available complaint forms
- Current file containing complaints
- UTA conducts periodic on-site monitor assessments to determine the sub recipient's compliance with the FTA Title VI regulations. These reviews include service measurements, location of transit service and facilities, participation opportunities in the transit planning and decision-making processes, and communication needs of persons with limited English proficiency (LEP).

Suzy's Senior Companionship Services agrees to participate in training that includes Title VI and its requirements. The UTA Compliance Officer presents the following:

- Introduces Title VI and its requirements for compliance
 - Provides information regarding outreach opportunities to minority populations and demographic information
- Provides sample Title VI posters (including required signatures and contact information)
 - Discusses required poster locations
- Discusses LEP and provides the sample UTA LEP tools
- Discusses Title VI complaint forms
- Provides sample Title VI complaint forms
- Discusses the required maintenance of a Title VI file readily available for review
- Discusses the reporting requirements and the annual Certification and Assurances
- Discusses the required Title VI verification, including a description of lawsuits and complaints for the past year



P.O. Box 1943, Layton, Utah 84041

Title VI Non-Discrimination Plan

Policy and Assurances

Suzy's Senior Care Services' (SSCS) goal is to fully comply with Title VI of the Civil Rights Act of 1964 and related non-discrimination authorities. The SSCS has given assurances to the US Department of Transportation in this regard.

What is Title VI?

The Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, and related non-discrimination authorities say:

"No person in the United States shall, on the ground of race, color, national origin, sex, age, disability, low-income, or Limited English Proficiency be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance."

SSCS values everyone's civil rights and aims to provide equal opportunity and service for members of the public. As a federal aid recipient, the SSCS strives to ensure non-discrimination authorities and equal opportunity in all of its programs and activities.

Title VI Notice to the public

The FTA requires that transit agencies inform the public of their rights and protections under Title VI. SSCS strives to keep members of the public apprised of their rights and protections against discrimination afforded them in Title VI by providing and posting a notice to the public explaining their rights at various locations. A copy of the notice can be found:

- In all company vehicles that provide transportation to our consumers/constituents and
- In our office near the reception area where the public can see it.

Who Qualifies as a LEP Person?

Limited English Proficient refers to any person, age five years and older, who does not speak English as their primary language and has a limited ability to read, speak, write or understand English.

SSCS is committed to being fully compliant with Title VI and Executive Order 13166 and to truly find ways to provide meaningful access to people with limited English proficiency. In order to accomplish this, SSCS provides the following LEP services

SSCS employs a bilingual resource for Spanish translation both verbal and written.

SSCS will provide other language transition services as necessary and within means

Title VI Investigation, complaints, and lawsuits

Suzy's has developed procedures for investigating and tracking Title VI complaints filed against them and has made those procedures for filing a complaint available to the public. The complaint procedure is outlined below:

Complaint Procedures

Complaints may be filed by anyone who believes they have been excluded from participation in, denied the benefits of, or otherwise subjected to discrimination under any SSCS service, program, or activity, whether federally funded or not, based on their race, color, national origin, age, sex, disability, low income status or Limited English Proficient.

Complaints will be accepted in writing only and may be filed with SSCS's Executive Director, Suzy Larsen. Allegations received by telephone call, fax, or email concerning a complaint will not be accepted; the SSCS employee will immediately direct the customer to the process of filling out the official complaint form available in our office at 1052 East 3250 North, Layton Utah 84040.

A signed, written complaint documented on the Customer Complaint Form must be submitted within 180 days of the alleged discriminatory act.

Upon receiving a written complaint, all reasonable efforts will be made by Investigators to contact the complainant by telephone, email, or in person. Otherwise, a response letter will be sent to the Complainant informing them that their complaint was received by the agency and is in the review process.

You may email, or mail your Civil Rights Complaints Form to

- Email: suzy@suzySeniorcareservices.org
- Mail:

Suzy Larsen
P.O. Box 1943
Layton, Utah 84401

To file a Title VI or ADA complaint with UTA on SSCS, individuals may contact:

Andrew Gray
UTA Title VI Compliance Officer
(801) 287-3533
Email: AGray@rideuta.com

Cherissa Alldredge
UTA ADA Compliance Office
(801) 287-3536
Email: CAldredge@rideuta.com

Community Participation Process

The Community Participation Process (CPP) is used to expand the SSCS's public outreach, support two-way dialogue with consumers/constituents, and supplement feedback. It enables SSCS policy to be relevant to local communities and fulfills the agency's obligations under the Title VI Program regarding the services provided by SSCS.

This process enables the agency to make informed decisions through collaborative efforts and builds mutual understanding and trust between the agency and the public. Successful public participation is a continuous process, consisting of a series of activities and actions to inform the public and stakeholders of potential SSCS changes to obtain input regarding how those potential changes may affect them.

At the SSCS's discretion, if a change in operations is significant enough to have a substantial impact on the community that SSCS serves, SSCS will reach out to their consumers/constituents for their input. This may be done by having a meeting with the consumers/constituents, through social media, email or outreach calls. However, the public does not need to attend meetings to provide feedback or comments since they can be accepted through email, social media, or online.



Suzy's Senior Companionship Services

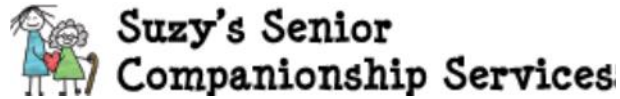
FTA COMPLAINT LOG

Date _____ Name of Agency _____

Person who prepared report _____

Contact Information: Phone _____ Email _____

A Date of Complaint	Complainant	Race	Color	National Origin	Recipient	Date Investigation Completed	Disposition	Date Of Disposition	Other Information	Referred To FTA



Limited English Proficiency (LEP) Plan

I. Introduction

This Limited English Proficiency (LEP) Plan has been prepared to address the responsibilities of Suzy's Senior Companionship Services (SSCS), as a recipient of federal financial assistance, relating to the needs of individuals with limited English language skills. LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write or understand English.

II. Legal Requirements

The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964 and its implementing regulations, which states 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 otherwise subjected to discrimination under any program or activity that receives Federal financial assistance.*”

Executive Order 13166, “Improving Access to Services for Persons with Limited English Proficiency” (August 16, 2000), indicates that differing treatment based upon a person's inability to speak, read, write or understand English is a type of national origin discrimination. The Executive Order states that recipients must take reasonable steps to ensure meaningful access to their programs and activities by LEP persons.

In addition, the Federal Transit Administration Circular 4702.1B dated October 1, 2012, “Title VI Requirements and Guidelines for Federal Transit Administration Recipients,” reiterates the obligation to take responsible steps to ensure meaningful access to benefits, services, and information for LEP persons and requires that FTA recipients develop a language assistance plan.

III. Four Factor Analysis

The U. S. Department of Transportation (DOT) issued its *Policy Guidance Concerning Recipient's Responsibilities to Limited English Proficient (LEP) Persons* [Federal Register: December 14, 2005 (Volume 70, Number 239)]. This guide states that DOT recipients are required to take reasonable steps to ensure meaningful access to programs by LEP persons. This coverage extends to the recipient's entire program. There are four factors for agencies to consider when assessing language needs and determining what steps to take to ensure meaningful access for LEP persons:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity or service of the recipient;
2. The frequency with which LEP individuals come in contact with the program;
3. The nature and importance of the program, activity or service provided by the recipient to people's lives;
4. The resources available to the recipient and costs.

SSCS's four factor analysis follows.

Factor 1: The number or proportion of LEP persons in the area eligible to be served or likely to encounter a SSCS program, activity or service

SSCS’s Executive Director reviewed the 2010 U.S. Census data and the most up-to-date information from the American Community Survey estimates to determine the proportion of LEP persons in the area. People are considered LEP if they marked on the survey that they speak English less than “very well”. While 7.6 % of the service area’s residents speak English less than very well, the most prevalent of the LEP languages by far is Spanish. Spanish speakers who speak English less than very well make up 4.9% of the total population. There is a significant break between the number of Spanish LEP speakers and all other language speakers, with the rest being 0.3% of the population or less.

The table which follows lists those languages which have over 1,000 LEP speakers in the service area.

Table 1: LEP Speakers in the SSCS Service Area, 2010

Languages Other Than English with Over 1,000 LEP Speakers

Weber, Davis, & Morgan Counties in the SSCS Service Area	Population Estimate*	Speak English less than "very well"	% of Total
Total:	1,859,211	14,1387	7.60%
Spanish or Spanish Creole	195,719	9,0443	4.86%
Chinese	11,161	5,722	0.31%
Vietnamese	6,320	4,060	0.22%
Korean	5,016	2,699	0.15%
Serbo-Croatian	4,534	2,383	0.13%
Russian	4,735	1,647	0.09%
Japanese	4,614	1,547	0.08%
Laotian	2,635	1,442	0.08%
German	8,811	1,438	0.08%
Tagalog	4,145	1,376	0.07%
Portuguese or Portuguese Creole	4,695	1,348	0.07%
Mon-Khmer, Cambodian	2,185	1,297	0.07%
French (incl. Patois, Cajun)	6,885	1,218	0.07%
Arabic	2,262	1,077	0.06%

From 2006-2010 American Community Survey 5-Year Estimates

*The estimate of the population uses the Upper Confidence Interval (the margin of error in the survey), which means that there is a 90% chance that the correct number is between this level and the Lower Confidence Interval. This takes the most generous approach to estimating the populations.

Any person living in SSCS’s service area is eligible to be served. According to the 2000 U.S. Census, more than 11% of LEP persons aged 16 years and over reported use of public transit as their primary means of transportation to work, compared with about 4% of English speakers. Using this figure, we can estimate the number of commuters who are most likely to encounter SSCS’s service on a regular basis. If 11% of the LEP persons in the SSCS service area ride transit to work, then there are just under 14,000 people riding.

Table 2: Estimated LEP Commuters in Weber, Davis, & Morgan Counties in SSCS Service Area

Language	Speak English less than "very well"	Estimate of those who ride transit to work (11%)
Spanish or Spanish Creole	90,443	9,949
Chinese	5,722	629
Vietnamese	4,060	447
Korean	2,699	297
Serbo-Croatian	2,383	262
Russian	1,647	181
Japanese	1,547	170
Laotian	1,442	159
German	1,438	158
Tagalog	1,376	151
Portuguese or Portuguese Creole	1,348	148
Mon-Khmer, Cambodian	1,297	143
French (incl. Patois, Cajun)	1,218	134
Arabic	1,077	118
Persian	841	93
Thai	832	92
Italian	816	90
Navajo	809	89
Armenian	754	83
Urdu	733	81
Greek	709	78
Polish	649	71
Hindi	600	66
Yiddish	595	65
French Creole	556	61
Hmong	524	58
Hungarian	500	55
Gujarati	426	47
Total		13,975

Factor 2: The frequency with which LEP persons come in contact with SSCS programs, activities or services

Customer Contact

SCSC's reports that approximately 10% of its clients are Spanish-speakers. Requests for services in other languages are less frequent. Examples of other languages served include Vietnamese and Sign Language.

Factor 3: The nature and importance of programs, activities or services provided by SSCS to LEP people's lives

Public transportation is vital to many people's lives. According to the DOT's LEP Policy Guidance, "providing public transportation access to LEP persons is crucial. An LEP person's inability to utilize effectively public transportation may adversely affect his or her ability to obtain health care, or education, or access to employment." Therefore, the transportation programs SSCS provides are critical to many, especially for people without access to personal vehicles.

In rare situations, such as in an emergency, lack or delay of language services to LEP people relating to emergency response procedures or safe evacuation could possibly be life threatening.

Factor 4: The resources available to SSCS and costs to provide LEP assistance

SSCS is committed to assuring that resources are used to reduce the barriers that limit access to information and services by LEP persons. Many costs associated with delivery of service to LEP individuals are already included in the daily cost of doing business with a diverse population.

DOT's LEP Guidance distinguishes *oral language services* ("**interpretation**") from *written language services* ("**translation**"), so SSCS will follow these definitions when looking at language assistance.

Current Language Assistance Resources

- SSCS employs bilingual staff who are assigned to clients with the language needs. SSCS has been very successful finding staff who speak the same language as its clients. t
- SSCS will provide its webpage and documents in Spanish and English and will translate its print materials into other languages as needed.