

Aging Services Inc.

FY2025

Title VI/ADA Nondiscrimination

Plan For Sub-Recipients

Date filed with FTA 5310 Transportation

June 15, 2020

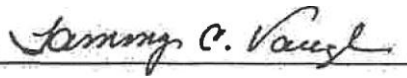
## Nondiscrimination Assurances

Aging **Services Inc.** agrees to comply with all provisions prohibiting discrimination on the basis of race, color, or national origin of Title VI of the Civil Rights Act of 1964, as amended, 42 U.S.C. 200d *et seq.*, and with U.S. 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.

Aging **Services Inc.** assures that no person shall, as provided by Federal and State civil rights laws, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity. Aging Services Inc. further ensures every effort will be made to ensure non-discrimination in all programs and activities, whether those programs and activities are federally funded or not.

Aging Services Inc. meets the objectives of the FTA Master Agreement which governs all entities applying for FTA funding, including **Aging Services Inc.** and its third-party contractors by promoting actions that:

- A. Ensure that the level and quality of transportation service is provided without regard to race, color, or national origin.
- B. Identify and address, as appropriate, disproportionately high and adverse effects of programs and activities on minority populations and low-income populations.
- c. Promote the full and fair participation of all affected Title VI populations in transportation decision making.
- D. Prevent the denial, reduction, or delay in benefits related to programs and activities that benefit minority populations or low-income populations.
- E. Ensure meaningful access to programs and activities by persons with Limited English Proficiency (LEP).

Signature   
Tammy C. Vaughn  
Executive Director

## Attachment B

### Subrecipient's General Information

1. Provide subrecipient's mission statement

The mission of Aging Services, Inc. is to enhance the lives and dignity of Cleveland County senior adults by providing programs, services and referrals that assist and promote healthy independent living. We are all about helping you continue to live in the home of your choice safely for as long as possible.

2. History (including year started)

Aging Services Inc./ASI began operations in the mid 1970's and was incorporated in 1988. ASI was formed in response to the passage of the Older Americans Act Grant.

3. Regional Profile (regional population; growth projection)

ASI transportation program only serves the Norman, OK area.

4. Population served (in relation to regional population)

ASI transportation program serves older adults and disabled adults in the Norman, OK area.

5. Service area (include map, with any routes identified)

For Norman, OK the boundaries are: Tecumseh road on the north, Cedar Lane on the south, 36<sup>th</sup> on the east and 48<sup>th</sup> on the west.

6. Designated Title VI Coordinator (include name, contact information, attendance dates to Title VI trainings)

Tammy C. Vaughn

ASI

1179 East Main St.

405-321-3200

tvaughnasi@gmail.com

Yet to be trained on Title VI

7. Governing body make-up (include terms of office)

ASI is governed by a 9 member Board of Directors. Board terms are 3 years with no limit to how many terms can be served.



# Notice of Non Discrimination



TITLE VI OF THE CIVIL RIGHTS ACT OF 1964 AS AMENDED AND 49 CFR PART 21 ENSURE THAT NO PERSON SHALL ON THE GROUNDS OF RACE, COLOR, OR NATIONAL ORIGIN, BE EXCLUDED FROM PARTICIPATING IN, OR BE DENIED THE BENEFITS OF, OR BE SUBJECT TO DISCRIMINATION UNDER ANY PROGRAM OR ACTIVITY RECEIVING FEDERAL FINANCIAL ASSISTANCE WITHOUT REGARD TO WHETHER SPECIFIC PROJECTS OR SERVICES ARE FEDERALLY FUNDED

For more information about the Title VI Civil Rights Program, please visit [www.kdh](http://www.kdh.okdhs.org) click on the 'offices and locations' tab, and Office of Civil Rights. You may also contact Aging Services Division, 5310 Transportation staff at (405) 521- 2281.

## Who May file a Complaint?

Any person who feels that his/her request for access to transportation was denied because of discrimination as described above. He/she must file the complaint and provide contact information within 180 days following the incident by:

E-mail to: OKDHS/ASD/5310 Transportation Program at  
Patricia.Heer@okdhs.org.

Fax to: OKDHS/ASD/5310 Transportation Program at  
(405) 522-6738

Mail to: OKDHS/ASD/5310 Transportation Program  
2401 N.W. 23<sup>rd</sup>, Suite 40, Oklahoma City, OK 73107

**If information is needed in another language or other accessible format, to make a request, call 405-321-3200.**

Attachment D

### **Title VI/ADA Procedures For Filing A Complaint**

The complaint procedures apply to the beneficiaries of Aging **Services Inc.** programs, activities, and services.

**RIGHT TO FILE A COMPLAINT:** Any person who believes they have been discriminated against on the basis of race, color, or national origin by **Aging Services Inc.** may file a Title VI/ADA complaint by completing and submitting the agency's **Title VI/ADA Complaint Form**. Title VI/ADA complaints must be received in writing within 180 days of the alleged discriminatory complaint.

**HOW TO FILE A COMPLAINT:** Information on how to file a Title VI complaint is posted on our agency's website, and in public areas of our agency.

You may download the Aging Services Inc. Title VI Complaint Form at not available at this time, or request a copy by writing to 2227 W. Lindsey Street, Norman, OK 73069. Information on how to file a Title VI/ADA complaint may also be obtained by calling Aging Services Inc. at 405-321-3200.

You may file a signed, dated complaint no more than 180 days from the date of the alleged incident. The complaint should include:

- Your name, address and telephone number;
- Specific, detailed information (how, why, and when) about the alleged act of discrimination; and
- Any other relevant information, including the names of any persons, if known, the agency should contact for clarity of the allegations.

Please submit your complaint form to Tammy C. Vaughn, 2227 W. Lindsey Street, Norman, OK 73069.

**COMPLAINT ACCEPTANCE:** Aging Services Inc. will process complaints that are complete. Once a completed Title VI/ADA Complaint Form is received, Aging Services Inc. will review it to determine if Aging Services Inc. has jurisdiction. The complainant will receive an acknowledgement letter informing them whether or not the complaint will be investigated by Aging Services Inc.

**INVESTIGATIONS:** Aging Services Inc. will generally complete an investigation within 90 days from receipt of a completed complaint form. If more information is needed to resolve the case, Aging Services Inc. may contact the complainant. Unless a longer period is specified by Aging Services Inc., the complainant will have ten (10) days from the date of the letter to send requested information to the Aging Services Inc. investigator assigned to the case. If the requested information is not received within that timeframe, the case will be closed. Also, a case can be administratively closed if the complainant no longer wishes to pursue the case.

If the requested information is not received within that timeframe the case will be closed. Also, a case can be administratively closed if the complainant no longer wishes to pursue the case.

LETTERS OF CLOSURE OR FINDING: After the Title VI/ADA investigator reviews the complaint, the Title VI/ADA investigator will issue one of two letters to the complainant: a closure letter or letter of finding (LOF).

#### Attachment D

- A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed.

- A Letter of Finding (LOF) summarizes the allegations and provides an explanation of the corrective action taken.

If the complainant disagrees with Aging Services Inc. determination, the complainant may request reconsideration by submitting the request in writing to the Title VI/ADA investigator within seven (7) days after the date of the letter of closure or letter of finding, stating with specificity the basis for the reconsideration. Aging Services Inc. will notify the complainant of the decision either to accept or reject the request for reconsideration within ten (10) days. In cases where reconsideration is granted, Aging **Services Inc.** will issue a determination letter to the complainant upon completion of the reconsideration review.

If information is needed in another language, contact **Aging Services Inc.** at 2227 W. Lindsey Street, Norman, OK 73069, or at 405-321-3200.

## Aging Services Inc. Title VI/ADA Complaints Form

"No person in the United States shall, on the basis 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 that you have been discriminated against in the provision of transportation services, please provide the following information to assist us in processing your complaint. Should you require any assistance in completing this form or need information in alternate formats, please let us know.

Please mail or return this form to:

**Aging Services Inc.**

Tammy C. Vaughn

**2227 W. Lindsey St**

Norman, OK 73069

405-321-3200

[tvaugh@agingservicesok.org](mailto:tvaugh@agingservicesok.org)

PLEASE PRINT

1. Complainant's Name:		
a. Address:		
b. City:	State:	Zip Code:
c. Telephone (include area code): Home ( ) or Cell ( )		Work
( 1 )		( )
d. Electronic mail (e-mail) address:		
Do you prefer to be contacted by this e-mail address? ( ) YES ( ) NO		
2. Accessible Format of Form Needed? ( ) YES specify: ( ) NO		
3. Are you filing this complaint on your own behalf? ( ) YES If YES, please go to question 7. ( ) NO If no, please go to question 4		
4. If you answered NO to question 3 above, please provide your name and address.		
a. Name of Person Filing Complaint:		
b. Address:		
c. City:	State:	Zip code:
d. Telephone (include area code): Home ( ) or Cell ( )		Work
( )		( )
e. Electronic mail (a-mail) address:		
Do you prefer to be contacted by this e-mail address? ( ) YES ( ) NO		
5. What is your relationship to the person for whom you are filing the complaint?		
6. Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party. ( ) YES, I have permission. ( ) NO, I do not have permission.		
7. I believe that the discrimination I experienced was based on (check all that apply): ( ) Race ( ) Color ( ) National Origin (classes protected by Title VI) ( ) Other (please specify)		

## Attachment E

8. Date of Alleged Discrimination (Month, Day, Year):		
9. Where did the Alleged Discrimination take place?		
10. Explain as clearly as possible what happened and why you believe that you were discriminated against. Describe all of the persons that were involved. Include the name and contact information of the person(s) who discriminated against you (if known). <i>Use the back of this form or separate pages if additional space is required.</i>		
11. Please list any and all witnesses' names and phone numbers/contact information. <i>Use the back of this form or separate pages if additional space is required.</i>		
12. What type of corrective action would you like to see taken?		
13. Have you filed a complaint with any other Federal, State, or local agency, or with any Federal or State court? ( ) YES If yes, check all that apply. ( ) NO a. ( ) Federal Agency (List agency's name) b. ( ) Federal Court (Please provide location) c. ( ) State Court d. ( ) State Agency (Specify Agency) e. ( ) County Court (Specify Court and County) f. ( ) Local Agency [Specify Agency]		
14. If YES to question 14 above, please provide information about a contact person at the agency/court where the complaint was filed.		
Name:	Title:	
Agency:	Telephone. ( )	
Address:		
City:	State:	Zip Code:

You may attach any written materials or other information that you think is relevant to your complaint.,

Signature and date is required:

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

If you completed Questions 4, 5 and 6, your signature and date is required:

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date



Attachment F

Documenting Complaints, Investigations, and Lawsuits

All Title VI/ADA complaints will be entered and tracked in Aging Services Inc. complaint log. Active investigations will be monitored for timely response on the part of all parties. The agency's Title VI/ADA Coordinator shall maintain the log.

Aging Services Inc. Title **VI Complaints, Investigations, and Lawsuits Log**

Date complaint filed	Complainant	Basis of complaint R-C-NO	Summary of allegation	Pending status of complaint	Actions taken	Closure Letter (CL)	Letter of Finding (LOF)	Date of CL or LOF

Documenting Evidence of Agency Staff Title VI/ADA Training

Aging Services Inc. staff are given Title VI training, and agency can answer affirmatively to all the following questions:

- Are new employees made aware of Title VI/ADA responsibilities pertaining to their specific duties?
- Do new employees receive this information via employee orientation?
- Is Title VI/ADA information provided to all employees and program applicants?
- Is Title VI/ADA information prominently displayed in the agency and on any program materials distributed, as necessary?

## Aging Services Inc. Limited English Proficiency Plan

### Introduction

This Limited English Proficiency (LEP) Plan has been prepared to address Aging Services Inc. responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964; Federal Transit Administration Circular 470Z.1B, dated October 1, 2012, which states that the level and quality of transportation service is provided without regard to race, color, or national origin.

Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency", indicates that differing treatment based upon a person's inability to speak, read, write or understands English is a type of national origin discrimination. It directs each agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discrimination does not take place. This order applies to all state and local agencies which receive federal funds, including all **Aging Services Inc.** departments receiving federal grant funds.

**Aging Services Inc.** has developed this LEP Plan to help identify reasonable steps for providing language assistance to persons with LEP who wish to access services provided. As defined Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write or understand English. This plan outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, staff training that may be required, and how to notify LEP persons that assistance is available.

To determine if the subrecipient is required to file an LEP Plan, first fill out the LEP Four Factor Analysis form.

### LEP Four Factor Analysis

In order to prepare this plan, **Aging Services Inc.** used the four-factor LEP analysis which considers the following factors:

1. The number *or* proportion of LEP persons in the service area who may be served or are likely to **require** Aging **Services Inc.** services.

The Aging Services Inc. staff reviewed the current U.S. census report and determined that in the Aging Services Inc. service area 24,109 persons (9.7%) of populations speaks a language other than English. Of those 8,891 persons (3.58%) have limited English proficiency; that is, they speak English "not well" or "not at all", this is 1% of the overall population in the service area. In Aging Services Inc. service area, of those persons with limited English proficiency, 4.40 speak Spanish, 1.40 speak Indo-European, and 3.20speak Asian or other Pacific Islander Languages.

## Attachment G

2. The frequency with which LEP persons come in contact with Aging Services Inc. services.

Aging Services Inc. staff reviewed the frequency with which the board/council, office staff and bus drivers have or could have, contact with LEP persons. This includes documenting phone inquiries of office visits. To date, Aging Services Inc. has received XX requests for translated programs and documents.

3. The nature and importance of services provided by Aging Services Inc. to the LEP population.

*Example Language:* There is no large geographic concentration of any type of LEP individuals in the service area for the Aging Services Inc.. The overwhelming majority of the population, 99.9%, speak only English. As a result, there are few social, service, professional and leadership organizations within **Aging Services Inc.** service area that focus on outreach to LEP individuals. **Aging Services Inc.** Board/council, office staff and bus/van drivers are most likely to encounter LEP individuals through bus/van rides, office visits, phone conversations, and attendance at Board/Council meetings.

4. **The resources available to Aging Services inc. and the overall costs to provide LEP assistance.**

*Example Language:* Aging **Services Inc.** reviewed its available resources that could be used for providing LEP assistance and which of its documents would be most valuable to be translated if the need should arise. Aging Services Inc. has contacted local citizens that would be willing to provide voluntary language(s) translation if needed, within a reasonable time period. Other language translation if needed would be provided through a telephone interpreter line for which the Aging **Services Inc.** would pay a fee.

*Option 2:* Based on the Four Factor Analysis, our research shows that in the Aging **Services Inc.** service area, we exceed the minimum requirement of 5% or 1,000 individuals whichever is less. Therefore, a LEP Plan is required. Listed below are the resources used to obtain this information. Examples of resources can be found at Attachment I.

## AttaChment G

### Resources:

Resource #1

Resource #2

Aging Services Inc. agrees to the following requirements of an LEP Plan as mentioned below:

### Language Assistance

A person who does not speak English as their primary language and who has a limited ability to read, write, speak or understand English may be a Limited English Proficient person and may be entitled to language assistance with respect to Aging **Services Inc.** services. Language assistance can include interpretation, which means oral or spoken transfer of a message from one language into another language and/or translation, which means the written transfer of a message from one language into another language.

**Aging Services Inc.** staff will identify persons who speak English “not well” or “not at all” by:

- Posting notice of LEP Plan and the availability of interpretation or translation services free of charge in languages LEP persons would understand.
- Providing “I Speak” cards to assist in identifying the language interpretation needed if the occasion arises.
- Informally surveying experiences concerning any contacts with LEP persons during the previous year.
- Offering a translator (LEP) or interpreter (sign language for hearing impaired individuals) at informational meetings or events. Volunteer interpreters for language(s) are available and will be provided within a reasonable time period. Language interpretation will be accessed for all other languages through a telephone interpretation service. Additionally, a staff person may greet participants as they arrive. By informally engaging participants in conversation, it is possible to gauge each attendee's ability to speak and understand English. Although translation may not be able to be provided at the event, it will help identify the need for future events.

### Staff Training

The following training will be provided to all Aging **Services Inc.** staff:

- Information on the Title VI Policy and LEP responsibilities.
- Description of languages assistance services offered to the public.

### Attachment G

- a Use of “I Speak” cards.
- Documentation of language assistance requests.
- How to handle a potential Title VI/ADA LEP complaint.

All contractors or subcontractors performing work for Aging Services Inc. will be required to follow the Title VI/ADA LEP guidelines.

### Translation of Documents

After weighing the cost and benefits of translating documents for potential LEP groups, and considering the expense of translating the documents, the likelihood of frequent changes in documents and other relevant factors, Aging Services Inc. will consider the following options:

- Initiate an outreach program for translation services.
- When staff prepares a document or schedules a meeting for which the target audience is expected to include LEP individuals, then documents, meeting notices, flyers, and agendas will be printed in an alternative language based on the known LEP population.

### Monitoring and Updating the LEP Plan

**Aging Services Inc. will** update the LEP Plan as required. At a minimum, the plan will be reviewed and updated when data from the next U.S. Census is available, or when it is clear that higher concentrations of LEP individuals are present in **Aging Services Inc.** service area. Updates will include the following:

- The number of documented LEP person contacts encountered annually.
- How the needs of LEP persons have been addressed.
- Determination of the current LEP population in the service area.
- Determination as to whether the need for translation services has changed.
- Determine whether local language assistance programs have been effective and sufficient to meet the need.
- Determine whether **Aging Services Inc.** financial resources are sufficient to fund language assistance resources needed.
- Determine whether Aging **Services Inc.** fully complies with the goals of this LEP Plan.
- Determine whether complaints have been received concerning the agency's failure to meet the needs of LEP individuals.
- Maintain a Title VI/ADA complaint log, including LEP to determine issues and basis of complaints.

### Dissemination of the Aging Services Inc. LEP Plan

Aging Services Inc. will notify LEP persons of the LEP Plan and how to access language services, by posting signs at conspicuous and accessible locations which may include but not limited to the following:

#### Attachment G

- Aging Services Inc. Web Site
- Post Office
- County DHS Office

- 5310 Transportation Office  
Senior Center(s)
- Doctor's Offices
- » Other

State on agendas and public notices in the language those LEP persons would understand that documents are available in that language upon request at Aging Services Inc. office.

**Identification Of Aging Services Inc. Stakeholders By Race**

<b>Stakeholders</b>	<b>Caucasian</b>	<b>Latino</b>	<b>African American</b>	<b>Asian American</b>	<b>Total</b>
Board of Directors	8				8
Advisory Bodies	13				13
Transit Riders/Clients	112	5	2	1	120
Private Businesses/ Organizations					
Others					

**Aging Services Inc. Outreach Practices**

**Aging Services Inc.** ensures all outreach strategies, communications and public involvement efforts comply with Title VI. Aging Services Inc. Public Engagement Plan proactively initiates the public involvement process and makes concerted efforts to involve members of all social, economic, and ethnic groups in the public involvement process. Events such as public meetings and/or open houses are held at schools, churches, libraries and other non-profit locations easily accessible to public transit, convenient times, and compliant with the Americans with Disabilities Act.

Aligned with the above referenced communication tactics, **Aging Services Inc.** provides the following:

- a. Public notices published in non-English publications (if available).
- b. Title VI non-discrimination notice on agency's website.
- c. Agency communication materials in languages other than English (subject to Safe Harbor parameters).
- d. Services for Limited English Proficient persons. Upon advance notice, translators may be provided.

**2023-25 Title VI/ADA Program Public Engagement Process**

Aging Services Inc. [will conduct] a Public Engagement Process for the 2024-2025 Title VI Program. This process includes Community Meetings to seek input, provide education, and highlight key components of the Title VI Plan. Materials have been created to explain Title VI policies as well as provide education on how they relate to minority populations.

Aging Services Inc. [will conduct] a 30 day public comment period to provide opportunities for feedback on the 2023-24 Title VI Program.

Comments are accepted during the public outreach period via:

- \* Dedicated email address
- Website
- Regular mail
- Telephone
- In person
- Survey tool (agency option)

Aging Services Inc. [will provide] will provide a briefing to the Board of Directors and Advisory Bodies regarding all public comments prior to decision making. A publicly available summary report is compiled, including all individual comments.

Summary of Aging Services Inc. 2023-24 Public Outreach Efforts

<b>Satisfaction survey was provided to all riders in March 2023</b>
Explanation on the ASI <u>Transportation</u> Program is included in our brochure
AAA met at Rose Rock Villa for a Public Hearing on their Area Plan in the past but not in the last three years. The last Public Hearing held in Norman was in 2010.



## Attachment I

### WEB RESOURCES FOR LOCAL DEMOGRAPHICS

American Community Survey

<http://www.census.gov>

American Fact Finder

<http://www.factfinder2.census.gov>

Census Data

<http://www.census.gov>

<http://www.quickfacts.census.gov/gfd/Index.html> (Quick Facts for States/Counties/Cities)

Immigration Data

<http://www.migrationinformation.org/USFocus/display.cfm?ID=84>

Modern Language Association

<http://www.mla.org> (Language Maps)

### WEB RESOURCES for INTERPRETERS / TRANSLATORS

Interpreter/ Translator

<http://www.language-line.com>

American Translators Association (ATA)

<http://www.atanet.org>