Aging Services, Inc.

Dba: Aging Services, Inc.

Title VI Program

Date filed with ODOT Office of Mobility and Public Transit Programs:

October 28, 2026

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Introduction

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, disproportionally 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).

A. Agency Information

1. **Mission of TRANSIT AGENCY**

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.

2. **History (including year started)**

Aging Services Inc was formed in 1975. For the past 49 years, Aging Services Inc has had the honor and privilege to be awarded funds from the Older Americans Act to provide OAA/Title III programs and services. These funds have Aging Services Inc to deliver comprehensive programs including transportation to senior adults aged 60 and over as well as persons with disabilities in the city of Norman.

3. **Regional Profile (regional population; growth projection)**

Aging Services serves all of Cleveland County. However, our door-to-door transportation program only serves persons living in Norman, Oklahoma.

4. **Population served (in relation to regional population)**

Senior adults aged 60 and the physically disabled under 60.

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

City of Norman: North to Tecumseh, South to Cedarl Lane, East to 36th Street, and West to 48th Street (map is attached)

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

Board of Directors – 3 year terms of office with unlimited terms to serve.

Notice to the Public

NOTIFYING the PUBLIC of RIGHTS UNDER TITLE VI
AGING SERVICES, INC.

- Aging Services, Inc. operates its programs 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 Aging Services Inc.
- For more information on the Aging Services Inc's civil rights program, and procedures to file a complaint, contact 405-321-3200; email tvaughn@agingservicesok.org; or visit our administrative office at 2227 W. Lindsey, Suite 1213 Norman, Oklahoma 73069
- A complainant may file a complaint directly with the Oklahoma Department of Transportation by filing a complaint with the Contract Compliance Division, Attention: Contract Compliance Division Manager, 200 NE 21st Street, Oklahoma City, OK 73105-3204.
- If information is needed in another language contact: 405-321-3200.

***LIST OF LOCATIONS**

Agency Administrative Office – 2227 W. Lindsey, Suite 1213,

Norman, OK

Aging Services Inc. Website – agingservicesok.org

Kiwanis Kruiser –2227 W. Lindsey, Suite 1213, Norman, OK

Norman Wellness Center – 602 N. Findley, Norman, OK

Rose Rock Villa- 700 North Berry Road, Norman, OK

Norman Kitchen - 329 South Peters, Norman, OK

B. Procedure for Filing a Title VI Complaint

Filing a Title VI 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 complaint by completing and submitting the agency's **Title VI Complaint Form**. Title VI 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 **Agingservicesok.org,** or request a copy by writing to **2227 W. Lindsey, Suite 1213, Norman, OK 73069**. Information on how to file a Title VI 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.
- 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, Executive Director, 2227 W. Lindsey Street, Norman, OK 73069**.

COMPLAINT ACCEPTANCE: **Aging Services Inc.** will process complaints that are complete.

Once a completed Title VI Complaint Form is received, **Aging Services Inc.** will review it to determine **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, **Tammy C. Vaughn, Executive Director** may contact the complainant. Unless a longer period is specified by **Tammy C. Vaughn, Executive Director**, the complainant will have ten (10) days from the date of the letter to send the requested information to **Aging Services Inc.'s** 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.

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

- 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.'s** determination, the complainant may request reconsideration by submitting the request in writing to the Title VI 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.'s** 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.

A person may also file a complaint directly with the Federal Transit Administration, at the FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.

If information is needed in another language, contact **Tammy C. Vaughn, Executive Director** at **2227 W. Lindsey, Norman, OK 73069** or at **405-321-3200.**

C. Monitoring Title VI Complaints, Investigations, Lawsuits *and* Documenting Evidence of Agency Staff Title VI Training

Documenting Title VI Complaints/Investigations

All Title VI 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 Coordinator shall maintain the log.

Agency Title VI Complaint 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 Training

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

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

Public Participation Plan

Goal

The goal of the Public Participation Plan is to have significant and ongoing public involvement, by all identified audiences, in the public participation process for major agency outreach efforts.

Objectives

- To understand the service area demographics and determine what non-English languages and other cultural barriers exist to public participation.
- To provide general notification of meetings and forums for public input, in a manner that is understandable to all populations in the area.
- To hold public meetings in locations that are accessible to all area stakeholders, including but not limited to minority and low income members of the community.
- To provide methods for two-way communication and information and input from populations which are less likely to attend meetings.
- To convey the information in various formats to reach all key stakeholder groups.

Identification of Stakeholders

Stakeholders are those who are either directly or indirectly affected by an outreach effort, system or service plan or recommendations of that plan. Stakeholders include but are not limited to the following:

- Board of Directors – the governing board of the agency. The role of the Board is to establish policy and legislative direction for the agency. The Board defines the agency's mission, establishes goals, and approves then budget to accomplish the goals.
- Advisory Bodies – non-elected advisory bodies review current and proposed activities of the agency, and are encouraged to be active in the agency's public participation process. Advisory bodies provide insight and feedback to the agency.
- Agency Transit riders and clients
- Minority and low income populations, including limited English proficient persons
- Local jurisdictions and other government stakeholders
- Private businesses and organizations
- Employers
- Partner agencies

Elements of the Public Participation t Plan

It is necessary to establish a public participation plan that includes an outreach plan to engage minority and limited English proficient (LEP) populations.

Elements of the Public Engagement Plan include:

1. **Public Notice**
    a. Official notification of intent to provide opportunity for members of the general public to participate in public engagement plan development, including participation in open Board/council meetings, and advisory committees.
2. **Public Engagement Process/Outreach Efforts:**
    a. Public meetings
    b. Open houses
    c. Rider forums
    d. Rider outreach
    e. Public hearings
    f. Focus groups
    g. Surveys
    h. Services for the Disabled (Notices of opportunities for public involvement include contact information for people needing these or other special accommodations.)

    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 and compliant with the Americans with Disabilities Act.
3. **Public Comment**
    a. Formal public comment periods are used to solicit comments on major public involvement efforts around an agency service or system change.
    b. Comments are accepted through various means:
        i. Dedicated email address.
        ii. Website.
        iii. Regular mail.
        iv. Forms using survey tool for compilation.
        v. Videotaping.
        vi. Phone calls to Customer Service Center [phone]
4. **Response to Public Input**

    All public comments are provided to the Board of Directors prior to decision making. A publicly available summary report is compiled, including all individual comments.

Title VI Outreach Best Practices

Aging Services Inc. ensures all outreach strategies, communications and public involvement efforts comply with Title VI. **Aging Services Inc.'s** Public Participation 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. 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.

2025 - 2026 Title VI Program Public Participation Process

Aging Services, Inc. will conduct a Public Participation Process for the **2025-2026** 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. has provided briefings to the Board of Directors and Advisory Bodies.

Aging Services Inc. will conduct a 30 day public comment period to provide opportunities for feedback on the 2025-2026 Title VI Program.

Comments are accepted during the public outreach period via:

a. Email
b. Mail
c. Phone
d. In person
e. Survey tool ***(Aging Services Inc. option)***

Summary of 2025-2026 Public Outreach Efforts

Under the Older Americans Act, Aging Services Inc. by Areawide Aging Agency to send out surveys regarding transportation ridership. This year we had no riders state they had problems with the quality of our transportation services. We were complimented on door-to-door service, our safety protocols, and the help and concern by our bus driver.

D. Language Assistance Plan

Aging Services, Inc.'s Limited English Proficiency Plan

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 4702.1B, 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, titled "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 understand English is a type of national origin discrimination. It directs each federal agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discriminations do not take place. This order applies to all state and local agencies which receive federal funds.

Service Area Description: City of Norman, Oklahoma

North to Tecumseh, South to Cedar Lane, East to 36th Street, and West to 48th Street

Aging Services Inc. has developed this LEP Plan to help identify reasonable steps for providing language assistance to persons with limited English proficiency who wish to access services provided by **Aging Services Inc**. As defined in 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, and the ways in which assistance may be provided.

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

Four Factor Analysis

1. The number and proportion of LEP persons eligible to be served or likely to be encountered in the service area:

A significant majority of people in the **Aging Services Inc.** service area are proficient in the English language. Based on 2010 Census data, **11.3%** of the population five years of age and older speak English "less than very well" – a definition of limited English proficiency

LEP Population in Aging Services Inc. Service Area					
Population 5 years and over by language spoken at home and	**Service Area Sector Norman, OK**	**Service Area Sector N/A**	**Service Area Sector N/A**	**Service Area Total**	**Percentage of Population 5 Years and Older**

ability to speak English					
Population 5 Years and Over					
Speak English "less than very well"	11.3%				
Spanish					
Speak English "less than very well"	5.6%				
Other Indo-European					
Speak English "less than very well"	1.0%				
Asian and Pacific Island					
Speak English "less than very well"	4.7%				
All Other					
Speak English "less than very well"	0%				

2. Frequency of Contact by LEP Persons with **Aging Services Inc.** Services:

The **Aging Services Inc.** staff reviewed the frequency with which office staff, dispatchers and drivers have, or could have, contact with LEP persons. To date, **Aging Services Inc.** has, on average**, 0%** for an interpreter. **TRANSIT AGENCY** averages **238** phone calls per month.

LEP Staff Survey Form

Aging Services Inc. is studying the language assistance needs of its riders so that we can better communicate with them if needed.

1. How often do you come into contact with passengers who do not speak English or have trouble understanding you when you speak English to them? **LESS THAN MONTHLY**

   DAILY WEEKLY MONTHLY LESS THAN MONTHLY

2. What languages do these passengers speak?
3. What languages (other than English) do you understand or speak? We have two people on our staff who speak Spanish.

4. Would you be willing to serve as a translator when needed? Yes

Frequency of Contact with LEP Persons	
Frequency	**Language Spoken by LEP Persons**
Daily	
Weekly	
Monthly	
Less frequently than monthly	X

3. The importance of programs, activities or services provided by **Aging Services Inc.** to LEP persons:

Outreach activities, summarized in **Aging Services Inc.** Title VI Public Engagement Plan, include events such as public meetings and/or open houses held at schools, churches, libraries and other non-profit locations, and include specific outreach to LEP persons to gain under-standing of the needs of the LEP population, and the manner (if at all) needs are addressed.

Outside Organization LEP Survey

Organization: _____

1. What language assistance needs are encountered?
2. What languages are spoken by persons with language assistance needs?
3. What language assistance efforts are you undertaking to assist persons with language assistance needs?
4. When necessary, can we use these services?

4. The resources available to Aging Services, Inc. and overall cost to provide LEP assistance:

Strategies for Engaging Individuals with Limited English Proficiency include:

1. Language line. Upon advance notice, translators can be provided.
2. Language identification flashcards.
3. Written translations of vital documents (identified via safe harbor provision)
4. One-on-one assistance through outreach efforts.
5. Website information.
6. To the extent feasible, assign bilingual staff for community events, public hearings and Board of Directors meetings and on the customer service phone lines.

As applicable: Based on our demographic analysis (Factor 1) **Aging Services Inc.** has determined that no language group(s) within its service area meets Safe Harbor criteria requiring written translated "vital documents" by language group(s).

Aging Services Inc. will provide assistance and direction to LEP persons who request assistance.

Staff LEP Training

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

1. Information on **Aging Services Inc.** Title VI Procedures and LEP responsibilities.
2. Description of language assistance services offered to the public.
3. Use of Language Identification Flashcards.
4. Documentation of language assistance requests.

Monitoring and Updating the LEP Plan

The LEP Plan is a component of **Aging Services Inc.'s** Title VI Plan requirement.

Aging Services Inc. will update the LEP plan as required. At minimum, the plan will be reviewed and updated when it is clear that higher concentrations of LEP individuals are present in the **Aging Services Inc.** service area. Updates include the following:

1. How the needs of LEP persons have been addressed.
2. Determine the current LEP population in the service area.
3. Determine as to whether the need for, and/or extent of, translation services has changed.
4. Determine whether local language assistance programs have been effective and sufficient to meet the needs.
5. Determine whether **Aging Services Inc.'s** financial resources are sufficient to fund language assistance resources as needed.
6. Determine whether **Aging Services Inc.'s** has fully complied with the goals of this LEP Plan.
7. Determine whether complaints have been received concerning **Aging Services Inc.'s** failure to meet the needs of LEP individual.

E. Advisory Bodies

Table Depicting Membership of Committees, Councils, By Race

Committee [examples]	Caucasian	Latino	African American	Asian American		Total
Population Committee	10					100%
Access Committee	N/A					100%
Citizens Advisory Council	8	1	1	1		100%

Description of efforts made to encourage minority participation on committees:

- **Simply asking the seniors who are minorities to participate.**
- **Board Members are often a good source.**

F. Subrecipient Assistance

Aging Services Inc. does not have any subrecipients.

G. Subrecipient Monitoring

Aging Services Inc. does not have any subrecipients.

H. Equity Analysis of Facilities

Aging Services Inc. has not constructed any storage facilities, maintenance facilities, or operations centers in the last three years.

ATTACHMENTS:

TITLE VI COMPLAINT FORM –

The **Aging Services Inc.** is committed to ensuring that no person is excluded from participation in or denied the benefits of its services on the basis of race, color, or national origin, as provided by the Title VI of the Civil Rights Act of 1964, as amended. The Title VI complaints must be filed within 180 calendar days from the date of the alleged discrimination.

Date of Filing:	
Name:	
Address:	
City, State, Zip Code:	
Work Phone:	
Home Phone:	
E-mail Address:	

Aging Services, Inc.

2227 W. Lindsey,

Suite 1213

Norman, OK 73071

Phone: 405-321-3200

Indicate on what ground(s) you believe you have been discriminated against (check all that apply):

☐ Race ☐ Color ☐ National Origin

Indicate the person(s) who you believe discriminated against you:

Name(s):	
Work Location (if known):	
Work Phone:	
Date of alleged incident	

If you have an attorney representing you concerning the matters raised in this complaint, please provide the following:

Name:	
Address:	
Work Phone:	
E-mail Address:	

Explain why you believe discrimination has occurred. If there are witnesses, please provide names, addresses and telephone numbers. Be sure to include how other persons were treated differently than you. Attach additional pages as necessary and any written material pertaining to your case.

What remedy are you requesting? Please be specific.

Have you filed or do you intend to file a charge or complaint concerning the matters raised in this complaint with any other agencies (Federal, State, or local):

☐ Yes ☐ No

If so, please provide the following information:

Agency:	
Address:	
Name of Investigator (if known):	
Phone Number:	
E-mail Address:	
Date Filed:	

Status of I confirm that I have read the above charge(s) and it is true to the best of my knowledge.

Print or typed name of complainant:

Signature Date

Completed forms must be submitted to the **Aging Services Inc.**.

If you require any assistance in filling out this form please contact the **Aging Services Inc.** Title VI Coordinator at 405-321-3200.

The **Aging Services Inc.** ensures that no person or groups of persons shall, on the grounds of race, color, sex, religion, national origin, age, disability, retaliation, or genetic information, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any and all programs, services, or activities administered by **Aging Services Inc.** To request an accommodation please contact the **Aging Services Inc** ADA Coordinator at **405-321-3200**.

Aging Services Inc.
Board of Directors
CSBI Upstairs Conference Room
Monday, March 25, 2024

Call to Order
The meeting was called to order by President Will Gray. Board members present: Neil Vickers, Harold Haralson, Janie Milum, BJ Brewer, Charles Earley, Tyler Barrett and Belinda Gray. ASI staff members present: Tammy Vaughn and Ellen Conner. Board Members absent: Kim Lopez

Staff Spotlight
Shawn Stawicki, Kitchen Supervisor was introduced to the Board.

Approval of Minutes
Motion was made to accept the February 29, 2024 by Board Meeting Minutes by Janie Milum and second by Harold Haralson. Motion to approve passes.

Financial Report
Accountant Report - Ellen reviewed the Balance Sheet dated February 29, 2024. Noted:
The February 29, 2024 expense reimbursement was reported on 3-11, 2024 in the amount of $114,738.34. Also noted the expense reimbursement for January 31, 2024 has not been received. Reviewed the status of the Grants.

2025 Flat Budget – Tammy reported on the status of the projected budget for 2025. Currently, 100+ less meals will be served than current numbers. An average of 400 meals are prepared today with a waiting list of approximately 100. The 2025 Budget will allow for approximately 300 meals. AAA is aware of the cut in meals served.

Auditor – Arledge & Associates has been secured as the new auditor for ASI. A motion to approve $25,000 for the financial statement and $5,000 for the single audit by Harold Haralson and second by Christi Moore. Motion passes.

Executive Director Report
Tammy reviewed the Executive Director Report. Noted, the current Dietician, Linda Eckel will be retiring in October 2024. A new dietician will be hired when Linda retires in October.

Old Business
February 2025 – 50 Year Anniversary Celebration
Historical memorabilia is being collected for the 50th Year Anniversary Celebration in February 2025. Mark your calendars.

CSBI Lease and Properties – the board agreed to renew the lease in May at the current location.

Treasurer – BJ has reached out to the City of Norman's Treasurer. He is waiting on a response.

New Business

Board members received the Title VI plan in the board packet by Executive Director. Motion was made by Neil Vickers and Will Gray seconded to accept the plan as policy. Motion passed.

Committees

Planning Committee – Christi Moore, Chair

Discussed plans for upcoming fundraisers – Golf Tournament in Moore, Chili- Cook off and Tidings & Tinsel.

Finance Committee – Will Gray, Chair

No report

HR/Personnel – Tyler Barrett, Chair

Evaluations are being reviewed. Tyler asked Tammy to discuss contractor versus employee. Charles sent samples of a "succession plan" from other non-profit agencies. To be discussed at a later date.

Building Committee – Belinda Gray, Chair

Committee to become inactive.

Meeting Adjourned

Motion to adjourn by Will Gray and second by Charles Earley. Motion passes.



Will Gray, President

3-26-24

Date