

Title VI

2017 – 2019 Implementation Plan

Title VI of the Civil Rights Act of 1964

Diakon Adult Day Services at Ravenwood



Adopted date

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I. INTRODUCTION

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).

The Civil Rights Restoration Act of 1987 clarified the intent of Title VI to include all programs and activities of Federal-aid recipients, sub-recipients, and contractors whether those programs and activities are federally funded or not.

Recently, the Federal Transit Administration (FTA) has placed renewed emphasis on Title VI issues, including providing meaningful access to persons with Limited English Proficiency.

Recipients of public transportation funding from FTA and the Maryland Transit Administration (MTA) are required to develop policies, programs, and practices that ensure that federal and state transit dollars are used in a manner that is nondiscriminatory as required under Title VI.

This document details how **Diakon Adult Day Services at Ravenwood** incorporates nondiscrimination policies and practices in providing services to the public.

II. OVERVIEW OF SERVICES

Diakon Adult Day Services (ADS) at Ravenwood in Hagerstown, Maryland, was established in 1991 to further Diakon's mission is to love the neighbor through acts of service. Diakon ADS is affiliated with Diakon Child Family and Community Ministries which offers a variety of human services to children, youths, families, individuals and older adults without regard to religious affiliation. Diakon's services and employment practices are non-sectarian and are available to people regardless of race, religion, creed, disability, ancestry, national origin, age, or sex and in compliance with all local, state and federal laws. Operationally, Diakon is divided into two divisions: Senior Living Services and Children and Family Services, providing a rich array of programs and services for persons in need, ranging from birth to death.

ADS is a community-based medical adult day care program designed to meet the social, recreational, and physical needs of functionally and/or cognitively impaired adults in a protective setting, playing an important role in aging-in-place. More and more people are choosing to remain in their home and in the community as opposed to institutional care. ADS programs enable disabled adults to live in the least restrictive environment. The program also offers respite for those providing care in the home. The services at ADS are an economic investment in the community by allowing caregivers the ability to work full-time, knowing their loved ones are cared for and by reducing the burden of paying for the full-time care of those participants without the means to support themselves. ADS helps people with – and caregivers of people with – dementia/memory impairments, Parkinson's disease, Diabetes, osteoporosis, depression, history of stroke, visual impairment, chronic respiratory disease, hypertension, chronic psychiatric illnesses, arthritis, developmental disabilities, loneliness or social isolation, and those at risk of falls or other injury.

ADS at Ravenwood transports the elderly and adults with disabilities enrolled in Diakon Adult Day Services, to and from their homes and the ADS Center, enabling them to receive healthcare services in a medical adult daycare program. As the aging and senior population increases, the need for ADS services continues to grow. By providing transportation, we are ensuring that Washington County seniors and adults with disabilities are able to choose where to receive healthcare services and enable them to live at home, avoiding institutionalization.

Due to their medical needs, our clients are unable to drive. Their families and caregivers often have other responsibilities and some of our clients live outside of the county's para-transit provider.

Diakon ADS at Ravenwood is a program of Diakon Child, Family and Community Ministries, a 501(c)(3) organization in Pennsylvania and Maryland.

III. POLICY STATEMENT AND AUTHORITIES

Title VI Policy Statement

Diakon Adult Day Services at Ravenwood is committed to ensuring that no person shall, on the grounds of race, color, national origin, as provided by Title VI of the Civil Rights Act of 1964 and the Civil Rights Restoration Act of 1987 (PL 100.259), be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity, whether those programs and activities are federally funded or not.

Diakon Adult Day Services at Ravenwood's Title VI Manager is responsible for initiating and monitoring Title VI activities, preparing required reports, and other responsibilities as required by Title 23 Code of Federal Regulations (CFR) Part 200, and Title 49 CFR Part 21.

Signature of Authorizing Official

Date

Authorities

Title VI of the 1964 Civil Rights Act provides that no person in the United States shall, on the grounds of race, color, national origin, or sex, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving federal financial assistance (refer to 49 CFR Part 21). The Civil Rights Restoration Act of 1987 broadened the scope of Title VI coverage by expanding the definition of the terms “programs or activities” to include all programs or activities of Federal Aid recipients, sub recipients, and contractors, whether such programs and activities are federally assisted or not.

Additional authorities and citations include: Title VI of the Civil Rights Act of 1964 (42 U.S.C. Section 2000d); Federal Transit Laws, as amended (49 U.S.C. Chapter 53 et seq.); Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 U.S.C. 4601, et seq.); Department of Justice regulation, 28 CFR part 42, Subpart F, “Coordination of Enforcement of Nondiscrimination in Federally-Assisted Programs” (December 1, 1976, unless otherwise noted); U.S. DOT regulation, 49 CFR part 21, “Nondiscrimination in Federally-Assisted Programs of the Department of Transportation—Effectuation of Title VI of the Civil Rights Act of 1964” (June 18, 1970, unless otherwise noted); Joint FTA/Federal Highway Administration (FHWA) regulation, 23 CFR part 771, “Environmental Impact and Related Procedures” (August 28, 1987); Joint FTA/FHWA regulation, 23 CFR part 450 and 49 CFR part 613, “Planning Assistance and Standards,” (October 28, 1993, unless otherwise noted);

U.S. DOT Order 5610.2, “U.S. DOT Order on Environmental Justice to Address Environmental Justice in Minority Populations and Low-Income Populations,” (April 15, 1997); U.S. DOT Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient Persons, (December 14, 2005), and Section 12 of FTA’s Master Agreement, FTA MA 13 (October 1, 2006).

IV. NONDISCRIMINATION ASSURANCES TO MTA

In accordance with 49 CFR Section 21.7(a), every application for financial assistance from the Federal Transit Administration (FTA) must be accompanied by an assurance that the applicant will carry out the program in compliance with DOT's Title VI regulations. This requirement is fulfilled when the Maryland Transit Administration (MTA) submits its annual certifications and assurances to FTA. The MTA shall collect Title VI assurances from sub recipients prior to passing through FTA funds.

As part of the Certifications and Assurances submitted to MTA at the time of grant application and award, **Diakon Adult Day Services at Ravenwood** submits a Nondiscrimination Assurance which addresses compliance with Title VI as well as nondiscrimination in hiring (EEO) and contracting (DBE), and nondiscrimination on the basis of disability (ADA).

In signing and submitting the assurance, **Diakon Adult Day Services at Ravenwood** confirms to MTA our commitment to nondiscrimination and compliance with federal and state requirements.

V. PLAN APPROVAL DOCUMENT

I hereby acknowledge the receipt of the Diakon Adult Day Services at Ravenwood Title VI Implementation Plan 2014-2017. I have reviewed and approve the Plan. I am committed to ensuring that no person is excluded from participation in, or denied the benefits of Diakon Adult Day Services at Ravenwood's transportation services on the basis of race, color, or national origin, as protected by Title VI according to C 4702.1B Title VI requirements and guidelines for Federal Transit Administration sub-recipients.

Signature of Authorizing Official

DATE

Emried D. Cole, Jr., Esq., Chair

Diakon Child, Family and Community Ministries
Board of Directors

VI. ORGANIZATION AND TITLE VI PROGRAM RESPONSIBILITIES

Under the authority of **Diakon Adult Day Services at Ravenwood** the Administrator will serve as the Title VI Manager and is responsible for ensuring implementation of the agency's Title VI program. The specific areas of responsibility are described below.

Overall Organization for Title VI

The Title VI Manager and staff are responsible for coordinating the overall administration of the Title VI program, plan, and assurances, including complaint handling, data collection and reporting, annual review and updates, and internal education.

Title VI Manager Responsibilities

The Title VI Manager is charged with the responsibility for implementing, monitoring, and ensuring compliance with Title VI regulations. Title VI responsibilities are as follows:

1. Process the disposition of Title VI complaints received.
2. Collect statistical data (race, color or national origin) of participants in and beneficiaries of agency programs, (e.g., affected citizens, and impacted communities).
3. Conduct annual Title VI reviews of agency to determine the effectiveness of program activities at all levels.
4. Conduct Title VI reviews of construction contractors, consultant contractors, suppliers, and other recipients of federal-aid fund contracts administered through the agency.
5. Conduct training programs on Title VI and other related statutes for agency employees.
6. Prepare a yearly report of Title VI accomplishments and goals, as required.
7. Develop Title VI information for dissemination to the general public and, where appropriate, in languages other than English.
8. Identify and eliminate discrimination.
9. Establish procedures for promptly resolving deficiency status and writing the remedial action necessary, all within a period not to exceed 90 days.

General Title VI responsibilities of the agency

The Title VI Manager is responsible for substantiating that these elements of the plan are appropriately implemented and maintained, and for coordinating with those responsible for public outreach and involvement and service planning and delivery.

1. Data collection

To ensure that Title VI reporting requirements are met, **Diakon Adult Day Services at Ravenwood** will maintain:

- A database or log of Title VI complaints received. The investigation of and response to each complaint is tracked within the database or log.
- A log of the public outreach and involvement activities undertaken to ensure that minority and low-income people had a meaningful access to these activities.

2. Annual Report and Updates

As a sub-recipient of FTA funds, **Diakon Adult Day Services at Ravenwood** is required to submit a Quarterly Report Form to the MTA that documents any Title VI complaints received during the preceding quarter and for each year. **Diakon Adult Day Services at Ravenwood** will also maintain and provide to the MTA on an annual basis, the log of public outreach and involvement activities undertaken to ensure that minority and low-income people had a meaningful access to these activities.

Further, we will submit to MTA updates to any of the following items since the previous submission, or a statement to the effect that these items have not been changed since the previous submission, indicating date:

- A copy of any compliance review report for reviews conducted in the last three years, along with the purpose or reason for the review, the name of the organization that performed the review, a summary of findings and recommendations, and a report on the status or disposition of the findings and recommendations
- Limited English Proficiency (LEP) plan
- procedures for tracking and investigating Title VI complaints
- A list of Title VI investigations, complaints or lawsuits filed with the agency since the last submission
- A copy of the agency notice to the public that it complies with Title VI and instructions on how to file a discrimination complaint

3. Annual review of Title VI program

Each year, in preparing for the Annual Report and Updates, the Title VI Manager will review the agency's Title VI program to assure implementation of the Title VI plan. In addition, they will review agency operational guidelines and publications, including those for contractors, to verify that Title VI language and provisions are incorporated, as appropriate.

4. Dissemination of information related to the Title VI program

Information on our Title VI program will be disseminated to agency employees, contractors, and beneficiaries, as well as to the public, as described in the "public outreach and involvement" section of this document, and in other languages when needed according to the LEP plan as well as federal and State laws/regulations.

5. Resolution of complaints

Any individual may exercise his or her right to file a complaint if that person believes that he, she or any other program beneficiaries have been subjected to unequal treatment or discrimination in the receipt of benefits/services or prohibited by non-discrimination requirements. **Diakon Adult Day Services at Ravenwood** will report the complaint to MTA within three business days (per MTA requirements), and make a concerted effort to resolve complaints locally, using the agency's Title VI Complaint Procedures. All Title VI complaints and their resolution will be logged as described under Section 1. Data collection and reported annually (in addition to immediately) to MTA.

6. Written policies and procedures

Our Title VI policies and procedures are documented in this plan and its appendices and attachments. This plan will be updated periodically to incorporate changes and additional responsibilities that arise. During the course of the Annual Title VI Program Review (item 3 above), the Title VI Manager will determine whether or not an update is needed.

7. Internal education

Our employees will receive training on Title VI policies and procedures upon hiring and upon promotion. This training will include requirements of Title VI, our obligations under Title VI (LEP requirements included), required data that must be gathered and maintained. In addition, training will be provided when any Title VI-related policies or procedures change (agency-wide training), or when appropriate in resolving a complaint.

Title VI training is the responsibility of the Administrator.

8. Title VI clauses in contracts

In all federal procurements requiring a written contract or Purchase Order (PO), Diakon Adult Day Service's contract/PO will include appropriate non-discrimination clauses. The Title VI Manager will work with the Administrator who is/are responsible for procurement contracts and PO's to ensure appropriate non-discrimination clauses are included.

VII. GENERAL REPORTING REQUIREMENTS

Requirement to Provide Title VI Public Notice

Title 49 CFR Section 21.9(d) requires recipients to provide information to the public regarding the recipient's obligations under DOT's Title VI regulations and apprise members of the public of the protections against discrimination afforded to them by Title VI. At a minimum, **Diakon Adult Day Services at Ravenwood** shall disseminate this information to the public by posting a Title VI notice on the agency's website and in public areas of the agency's office(s), including the reception desk, meeting rooms, in federally-funded vehicles, etc. **A copy of Diakon Adult Day Services at Ravenwood's Title VI Notice and a list of locations is available in Appendix A.**

Title VI Complaint Procedures

Any individual may exercise his or her right to file a complaint with **Diakon Adult Day Services at Ravenwood** if that person believes that he or she have been subjected to unequal treatment or discrimination in the receipt of benefits or services. We will report the complaint to MTA within three business days (per MTA requirements), and make a concerted effort to resolve complaints locally, using the agency's Nondiscrimination Complaint Procedures. All Title VI complaints and their resolution will be logged and reported annually (in addition to immediately) to MTA.

A person may also file a complaint directly with the Federal Transit Administration, Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th floor – TCR, 1200 New Jersey Avenue SE, Washington, DC 20590.

Diakon Adult Day Services at Ravenwood includes the following language on all printed information materials, on the agency's website, in press releases, in public notices, in published documents, and on posters on the interior of each vehicle operated in passenger service:

Diakon Adult Day Services at Ravenwood is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transportation services on the basis of race, color or national origin, as protected by Title VI in the Federal Transit Administration (FTA) Circular 4702.1B. For additional information on Diakon Adult Day Services at Ravenwood's

nondiscrimination policies and procedures, or to file a complaint, please visit the website at <http://www.diakon.org/Adult-Day-Services/Ravenwood/> or contact Anne Dottavio, Administrator, Diakon Adult Day Services at Ravenwood, 1109 Luther Drive, Hagerstown, MD, 21740, (310) 791-1030.

Instructions for filing Title VI complaints are posted on the agency's website and in posters on the interior of each vehicle operated in passenger service and agency's facilities.

A copy of Diakon Adult Day Services at Ravenwood's Title VI Complaint Form and Procedure is attached as APPENDIX B.

Procedures for Handling and Reporting Investigations/Complaints and Lawsuits

Should any Title VI investigations be initiated by FTA or MTA, or any Title VI lawsuits are filed against **Diakon Adult Day Services at Ravenwood** the agency will follow these procedures:

Procedures

1. Any individual, group of individuals or entity that believes they have been subjected to discrimination on the basis of race, color, or national origin may file a written complaint with the Title VI Manager.

The complaint is to be filed in the following manner:

- a. A formal complaint must be filed within 180 calendar days of the alleged occurrence.
- b. The complaint should include:
 - the complainant's name, address, and contact information (i.e., telephone number, email address, etc.)
 - the date(s) of the alleged act of discrimination (if multiple days, include the date when the complainant(s) became aware of the alleged discrimination and the date on which the alleged discrimination was discontinued or the latest instance)
 - a description of the alleged act of discrimination
 - the location(s) of the alleged act of discrimination (include vehicle number if appropriate)
 - an explanation of why the complainant believes the act to have been discriminatory on the basis of race, color, and national origin
 - if known, the names and/or job titles of those individuals perceived as parties in the incident
 - contact information for any witnesses
 - indication of any related complaint activity (i.e., was the complaint also submitted to MTA or FTA?)
- c. The complaint shall be submitted to the Title VI Manager at 1109 Luther Drive, Hagerstown, MD 21740 and or DottavioA@diakon.org.

- d. In the case where a complainant is unable or incapable of providing a written statement, a verbal complaint of discrimination may be made to the Title VI Manager.
2. Upon receipt of the complaint, the Title VI Manager will immediately:
 - a. notify MTA (no later than 3 business days from receipt)
 - b. notify **Diakon Adult Day Services at Ravenwood's** Authorizing Official
 - c. ensure that the complaint is entered in the complaint database.
3. Within 3 business days of receipt of the complaint, the Title VI Manager will contact the complainant by telephone to set up an interview.
4. The complainant will be informed that they have a right to have a witness or representative present during the interview and can submit any documentation he/she perceives as relevant to proving his/her complaint.
5. If MTA has assigned staff to assist with the investigation, the Title VI Manager will offer an opportunity to participate in the interview.
6. The alleged discriminatory service or program official will be given the opportunity to respond to all aspects of the complainant's allegations.
7. The Title VI Manager will determine, based on relevancy or duplication of evidence, which witnesses will be contacted and questioned.
8. The investigation may also include:
 - a. investigating contractor operating records, policies or procedures
 - b. reviewing routes, schedules, and fare policies
 - c. reviewing operating policies and procedures
 - d. reviewing scheduling and dispatch records
 - e. observing behavior of the individual whose actions were cited in the complaint.
9. All steps taken and findings in the investigation will be documented in writing and included in the complaint file.
10. The Title VI Manager will contact the complainant at the conclusion of the investigation (but prior to writing the final report) and give the complainant an opportunity to give a rebuttal statement at the end of the investigation process.
11. At the conclusion of the investigation and **within 60 days** of the interview with the complainant, the Title VI Manager will prepare a report that includes a narrative description of the incident, identification of persons interviewed, findings, and recommendations for disposition. This report will be provided to the Authorizing Official, the MTA, and if appropriate our legal counsel.
12. The Title VI Manager will send a letter to the complainant notifying them of the outcome of the investigation. If the complaint was substantiated, the letter will indicate the course of action that will be followed to correct the situation. If the complaint is determined to be unfounded, the letter will explain the reasoning, and refer the complainant to MTA in the event the complainant wishes to appeal the determination. This letter will be copied to MTA.
13. A complaint may be dismissed for the following reasons:

- a. the complainant requests the withdrawal of the complaint
- b. an interview cannot be scheduled with the complainant after reasonable attempts
- c. The complainant fails to respond to repeated requests for additional information needed to process the complaint

Transportation-Related Title VI Investigations, Complaints , and Lawsuits

Background

All recipients shall prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, or national origin:

- Active investigations conducted by FTA and entities other than FTA;
- Lawsuits; and
- Complaints naming the recipient.

This list shall include the date that the transportation-related Title VI investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by the recipient in response, or final findings related to the investigation, lawsuit, or complaint. This list shall be included in the Title VI Program submitted to MTA every three years and information shall be provided to MTA quarterly and annually.

A copy of Diakon Adult Day Services at Ravenwood’s Title VI Investigations, Lawsuits and Complaints Log can be found in APPENDIX C.

Public Outreach and Involvement - Public Participation Plan

Introduction

Diakon Adult Day Services at Ravenwood (ADS) provides transportation services to Adult Day Services clients only. It does not provide public transportation services. ADS provides medical adult day care to seniors and adults with disabilities in Washington County.

ADS has collaborative relationships with county agencies for referrals and has a contract through the Department of Health and Mental Hygiene of the Developmental Disabilities Administration to provide services to low-income clients in need of Adult Day Care Services. Services are open to any senior or adult with disabilities over the age of 18 in Washington County.

ADS does not currently provide services to any individuals that are not fluent in the English Language. Although some of our clients and future clients are non-verbal they generally understand English and/or live with family that speaks on their behalf.

SEE APPENDIX D-Summary of Outreach Efforts

***Access for Limited English Proficient (LEP) Persons
Language Assistance Plan***

Introduction and Legal Basis

LEP is a term that defines any individual not proficient in the use of the English language. The establishment and operation of an LEP program meets objectives set forth in Title VI of the Civil Rights Act and Executive Order 13116, Improving Access to Services for Persons with Limited English Proficiency (LEP). This Executive Order requires federal agencies receiving financial assistance to address the needs of non-English speaking persons. The Executive Order also establishes compliance standards to ensure that the programs and activities that are provided by a transportation provider in English are accessible to LEP communities.

As required, **Diakon Adult Day Services at Ravenwood** developed a written LEP Plan (below). Using 2010 and American Community Survey (ACS) Census data, **Diakon Adult Day Services at Ravenwood** has evaluated data to determine the extent of need for translation services of its vital documents and materials.

LEP persons can be a significant market for public transit, and reaching out to these individuals can help increase their utilization of transit. Therefore, it also makes good business sense to translate vital information into languages that the larger LEP populations in the community can understand.

Assessment of Needs and Resources

The need and resources for LEP language assistance were determined through a four-factor analysis as recommended by FTA guidance.

Factor 1: Assessment of the Number and Proportion of LEP Persons Likely to be Served or Encountered in the Eligible Service Population

Diakon Adult Day Services at Ravenwood (ADS) has reviewed Census data on the number of individuals in its service area that have limited English Proficiency, as well as the languages that they speak.

Data on ADS's service area if Washington County was obtained from the American Community Survey 2011-2015 (this data was updated February 2017 for MDOT).

The agency's service area includes a total of 3,058 persons or 2.18% in Washington County with Limited English Proficiency. Please see the ACS Census Data for the agency's service area below.

Washington County			
Language	Number of LEP Population	Percent of County Population Speaking Language	Percent of LEP Population Speaking Language
Spanish or Spanish Creole	1,484	1.06%	48.53%
Chinese	302	0.21%	9.88%
Russian	179	0.13%	5.85%
French (incl. Patois, Cajun)	145	0.10%	4.74%
Other Asian languages	140	0.10%	4.58%
Korean	128	0.09%	4.19%
Vietnamese	116	0.08%	3.79%
German	97	0.07%	3.17%
Tagalog	65	0.05%	2.13%
Arabic	57	0.04%	1.86%
African languages	53	0.04%	1.73%
Italian	51	0.04%	1.67%
Urdu	47	0.03%	1.54%
Greek	41	0.03%	1.34%
Hindi	29	0.02%	0.95%
Hungarian	18	0.01%	0.59%
Serbo-Croatian	17	0.01%	0.56%
Gujarati	16	0.01%	0.52%
Other Slavic languages	15	0.01%	0.49%
Thai	15	0.01%	0.49%
Other and unspecified languages	15	0.01%	0.49%
Japanese	12	0.01%	0.39%
Persian	8	0.01%	0.26%
Other Pacific Island languages	6	0.00%	0.20%
Other West Germanic languages	2	0.00%	0.07%
Total LEP Population	3,058	2.18%	100.00%
Total County Population	140,528	100.00%	

Safe Harbor Provision threshold is 5% population or 1,000 persons, whichever is less.

Factor 2: Assessment of Frequency with Which LEP Individuals Come Into Contact with the Transit Services or System

Diakon Adult Day Services at Ravenwood does not currently come into contact with LEP persons. We will continue to identify emerging populations as updated Census data becomes available for our service areas.

Factor 3: Assessment of the Nature and Importance of the Transit Services to the LEP Population

Diakon Adult Day Services at Ravenwood (ADS) is a medical adult day service agency that has provided quality services to seniors and adults with disabilities for over 25 years. Our services allow clients to age in place and remain in the community while provided needed respite for caregivers.

Services are provided to individuals who have different levels of medical need and who need different levels of assistance. Employees are trained to meet the individualized needs of each person. Services are provided to people who have dementia and a variety of chronic conditions including diabetes, congestive heart failure, high blood pressure and cardio-pulmonary disease among others. Diakon ADS is licensed as a medical adult day service provider through the Maryland Department of Mental Health and Hygiene.

Diakon ADS provides daily transportation to and from the Adult Day Center in Hagerstown. Staff is trained to work with nonverbal clients as well as those who are not English proficient, although we are not currently serving LEP clients.

Factor 4: Assessment of the Resources Available to the Agency and Costs

Diakon Adult Day Services at Ravenwood provides services to disabled adults and seniors over the age of 18 and is likely to encounter various people of all backgrounds and languages. We currently do not have any LEP clients but we have processes in place to use photographic cue cards to communicate with nonverbal and LEP clients. Services are paid through a variety of public and private funding sources including a state contract and grants to supplement services for low-income clients. These services are critical for helping our clients to remain in the community and avoid or delay institutionalization and to provide much-needed respite for caregivers.

Minority Representation on Planning and Advisory Bodies

Title 49 CFR Section 21.5(b)(1)(vii) states that a recipient may not, on the grounds of race, color, or national origin, “deny a person the opportunity to participate as a member of a planning, advisory, or similar body which is an integral part of the program.”

Diakon Adult Day Services at Ravenwood does not have a transit-related, non-elected planning board, advisory council or committee, or similar committee.

APPENDICES A-E

APPENDIX – A – Title VI Notice to the Public; List of Locations

Title VI of the Civic Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in the 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).

Diakon Adult Day Services at Ravenwood (Diakon ADS) is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transportation services on the basis of race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1B. If you need more information or feel you are being denied participation in or being denied benefits of the transit services provided by Diakon ADS, or otherwise being discriminated against because of your race, color, national origin, gender, age or disability, our contact information is:

Anne Dottavio
Administrator/Title VI Manager
1109 Luther Drive
Hagerstown, MD 21740
dottavio@diakon.org

List of locations where the Title VI Notice to the Public is displayed:

1. The Diakon Adult Day Services at Ravenwood Notice Board
2. Diakon Adult Day Services at Ravenwood vehicles

APPENDIX B – Title VI Complaint Form and Procedures

Any individual may exercise his or her right to file a complaint with **Diakon Adult Day Services at Ravenwood (Diakon ADS)** if that person believes that he or she have been subjected to unequal treatment or discrimination in the receipt of benefits or services. We will report the complaint to MTA within three business days (per MTA requirements), and make a concerted effort to resolve complaints locally, using the agency's Nondiscrimination Complaint Procedures. All Title VI complaints and their resolution will be logged and reported annually (in addition to immediately) to MTA.

A person may also file a complaint directly with the Federal Transit Administration, Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th floor – TCR, 1200 New Jersey Avenue SE, Washington, DC 20590.

Diakon ADS includes the following language on all printed information materials, on the agency's website, in press releases, in public notices, in published documents, and on posters on the interior of each vehicle operated in passenger service:

Diakon Adult Day Services at Ravenwood is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transportation services on the basis of race, color or national origin, as protected by Title VI in the Federal Transit Administration (FTA) Circular 4702.1B. For additional information on Diakon Adult Day Services at Ravenwood's nondiscrimination policies and procedures, or to file a complaint, please visit the website at www.diakon.org/adult-day-services/ravenwood/ or contact Anne Dottavio, 1109 Luther Drive, Hagerstown, MD, 21740.

NOTE: The Diakon ADS Title VI Complaint Form may be used to submit LEP/LAP complaints as separate and distinct from Title VI.



DIAKON ADULT DAY SERVICES AT RAVENWOOD

DIAKON CHILD, FAMILY & COMMUNITY MINISTRIES

TITLE VI COMPLAINT FORM

Section I:				
Name:				
Address:				
Telephone (Home):		Telephone (Work):		
E-mail Address:				
Accessible Format Requirements?	Large Print		Audio Tape	
	TDD		Other: _____	
Section II:				
Are you filing this complaint on your own behalf?			Yes* <input type="checkbox"/>	No <input type="checkbox"/>
*If you answered "yes" to this question, go to Section III.				
If not, please supply the name and relationship to the person for whom you are complaining:				
Please explain why you have filed for a third party				
Please confirm that you have obtained permission of the aggrieved party if you are filing on behalf of a third party.			Yes <input type="checkbox"/>	No <input type="checkbox"/>
Section III:				
I believe the discrimination I experienced was based on (check all that apply):				
<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin				
Date of Alleged Discrimination (Month/Day/Year): ____/____/____				
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the names and contact information of any witnesses. If more space is needed, please use the back of this form.				
Section IV:				
Have you previously filed a Title VI complaint with this agency?			Yes <input type="checkbox"/>	No <input type="checkbox"/>
Section V:				
Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?			Yes <input type="checkbox"/>	No <input type="checkbox"/>
If yes, check all that apply:				
<input type="checkbox"/> Federal Agency: _____		<input type="checkbox"/> Federal Court: _____		
<input type="checkbox"/> State Agency: _____		<input type="checkbox"/> State Court: _____		
<input type="checkbox"/> Local Agency: _____				
Address:			Telephone:	
Section VI:				

Name of agency complaint is against:
Contact person:
Title:
Telephone Number:

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

Signature and date required below:

_____ / ____ / _____
Signature Date

Please submit this form in person at the address below, or mail this form to:

Diakon Adult Day Services at Ravenwood Title VI Coordinator
1109 Luther Drive
Hagerstown, MD 21740

APPENDIX C – Investigations, Lawsuits and Complaints Log

	Date (Month, Day, Year)	Summary (include basis of complaint: race, color or national origin)	Status	Action(s) taken
Investigations				
1.				
Lawsuits				
1.				
Complaints				
1.				

APPENDIX D – Public Participation Plan; Public Outreach Activities

Diakon Adult Day Services at Ravenwood (Diakon ADS) provides transportation services to Diakon ADS clients only. Diakon ADS does not provide public transportation services. The individuals that utilize Diakon ADS transportation services are Diakon clients.

Diakon ADS works with county agencies for referrals and conducts outreach through Alzheimer's and dementia support groups, churches and other community groups.

Diakon utilizes photographic cue cards to communicate with nonverbal or LEP clients.

APPENDIX E – Language Access Plan

Diakon Adult Day Services at Ravenwood (Diakon ADS) has evaluated the need for translation services of its vital documents and materials. Each Diakon ADS client is English speaking or, in the case of our nonverbal clients, they understand English. Additionally, we have photographic cue cards on hand to assist with communicating with clients in the event that we acquire a LEP client.

Signature

_____/_____/_____
Date

Anne Dottavio
Administrator/Title VI Manager

Please see a copy of DiakonADS’s Title VI Language Access Complaint procedure on the following page.

You may file a complaint with the Diakon ADS Title VI Manager if you believe you have been denied the benefits of this Plan. You must file your written complaint within 180 calendar days of the alleged denial. Submit the written complaint to:

Anne Dottavio
Administrator/Title VI Manager
Diakon Adult Day Services
1109 Luther Drive
Hagerstown, MD 21740

dottavioa@diakon.org

Title VI Complaint Form and Procedure

Any individual may exercise his or her right to file a complaint with **Diakon Adult Day Services at Ravenwood** if that person believes that he or she have been subjected to unequal treatment or discrimination in the receipt of benefits or services. We will report the complaint to MTA within three business days (per MTA requirements), and make a concerted effort to resolve the complaints locally, using the agency's Nondiscrimination Complaint Procedures. All Title VI complaints and their resolution will be logged and reported annually (in addition to immediately) to MTA.

A person may also file a complaint directly with the Federal Transit Administration, Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th floor – TCR, 1200 New Jersey Avenue SE, Washington, DC 20590.

Diakon ADS includes the following language on all printed information materials, on the agency's website, in press releases, in public notices, in published documents, and on posters on the interior of each vehicle operated in passenger service:

Diakon Adult Day Services at Ravenwood is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transportation services on the basis of race, color or national origin, as protected by Title VI in the Federal Transit Administration (FTA) Circular 4702.1B. For additional information on Diakon Adult Day Services at Ravenwood's nondiscrimination policies and procedures, or to file a complaint, please visit the website at www.diakon.org/adult-day-services/ravenwood/ or contact Anne Dottavio, 1109 Luther Drive, Hagerstown, MD, 21740.

NOTE: The Diakon ADS Title VI Complaint Form may be used to submit LEP/LAP complaints as separate and distinct from Title VI.



TITLE VI COMPLAINT FORM

Section I:			
Name:			
Address:			
Telephone (Home):		Telephone (Work):	
E-mail Address:			
Accessible Format Requirements?	Large Print		Audio Tape
	TDD		Other: _____
Section II:			
Are you filing this complaint on your own behalf?		Yes*	No
*If you answered "yes" to this question, go to Section III.			
If not, please supply the name and relationship to the person for whom you are complaining:			
Please explain why you have filed for a third party			
Please confirm that you have obtained permission of the aggrieved party if you are filing on behalf of a third party.		Yes	No
Section III:			
I believe the discrimination I experienced was based on (check all that apply):			
<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin			
Date of Alleged Discrimination (Month/Day/Year): ____/____/____			
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the names and contact information of any witnesses. If more space is needed, please use the back of this form.			
Section IV:			
Have you previously filed a Title VI complaint with this agency?		Yes	No
Section V:			
Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?		Yes	No
If yes, check all that apply:			
<input type="checkbox"/> Federal Agency: _____		<input type="checkbox"/> Federal Court: _____	
<input type="checkbox"/> State Agency: _____		<input type="checkbox"/> State Court: _____	
<input type="checkbox"/> Local Agency: _____			
Address:		Telephone:	
Section VI:			

Name of agency complaint is against:
Contact person:
Title:
Telephone Number:

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

Signature and date required below:

_____ / ____ / _____
Signature Date

Please submit this form in person at the address below, or mail this form to:

Diakon Adult Day Services at Ravenwood Title VI Coordinator
1109 Luther Drive
Hagerstown, MD 21740