

## Senior Access Title VI Notice

# Senior Access Title VI Non-Discrimination Policy Statement

Senior Access is committed to ensuring that no person is excluded from participation in, or denied the benefits of, or be subject to discrimination in the receipt of its services or programs on the basis of race, color or national origin or any other characteristics protected by law, including Title VI of the Civil Rights Act of 1964, as amended. Further, under the Americans with Disabilities Act (ADA) of 1990, no entity shall discriminate against an individual with a physical or mental disability in connection with the provision of transportation service.

To obtain more information on Senior Access Non-Discrimination obligations or to file a Title VI complaint, contact:

Name	Serita Lacasse, Executive Director
Address	2498 E Palm Valley Blvd
City, St, Zip	Round Rock, Texas 78665
Phone:	512-310-1060

You may file a written complaint no later than 180 calendar days after the date of the alleged the date of the alleged discrimination.

Information on non-English alternative formats may be obtained from Senior Access.

La información sobre formatos alternativos distintos del inglés se puede obtener Senior Access.

This notice is located in each bus and Senior Access office bookshelf.

## Procedures for Complaints of Discrimination

As a recipient of federal dollars, Senior Access is required to comply with Title VI of the Civil Rights Act of 1964 and ensure that services are provided on a non-discriminatory basis. Senior Access has in place a Title VI Complaint Procedure, which outlines a process for local disposition of Title VI complaints and is consistent with guidelines found in the Federal Transit Administration Circular 4702. Senior Access Title VI Complaint Procedure outlined below:

Any person alleging discrimination based on race, color, national origin, or any other characteristics protected by law has a right to file a complaint within 180 days of alleged discrimination. At the discretion of the complainant, the complaint may be filed with the federal department, the state recipient, or Senior Access. The complaint may be filed through a legal representative. The identity of the complainant is not necessary, provided the information is sufficient to determine the identity of the recipient, and indicates the possibility of a violation. Should the complaint be submitted to Senior Access, the following procedures will be followed:

### Eligibility

All complaints, written or verbal, made to Senior Access shall be accepted. In the event a complainant sets forth allegations verbally and refuses to reduce such allegations to writing, the person to whom the complaint is made shall reduce the elements of the complaint to writing.

### Filing of Complaints

Discrimination complaints, whether written or verbal, should contain the following information:

- Name, address and telephone number of the complainant if available.

- Name and location of the program delivering the service.

- Nature of the incident that led the complainant to believe discrimination was a factor.

- Basis of the complaint, i.e., race, color, or national origin.

- Names, addresses and phone numbers of people who may have knowledge of the event.

- Date or dates on which the alleged discriminatory event or events occurred.

- A complaint log shall be kept by Senior Access.

## Procedure

Complaints shall be handled within 90 days of their Receipt by Senior Access, depending on the nature of the complaint and the complexity of the investigation.

A letter shall be sent by Senior Access acknowledging receipt of the complaint to the complainant.

A preliminary inquiry shall be conducted by Senior Access on all complaints to substantiate or refute the allegations.

If the preliminary inquiry by Senior Access indicates that the complaint is valid, then a full complaint investigation shall be initiated. A certified letter shall be sent by Senior Access to the complainant and any persons of interest notifying them that an investigation has begun and they should contact Senior Access to schedule a date, time and place of interest, or shall be notified at this time that no discussion should take place regarding this complaint other than with the investigator without prior approval and knowledge from the investigator.

If the allegations are not substantiated, a certified letter shall be sent by Senior Access to the complainant that contains a description of the allegations investigated, the scope of the investigation, the facts learned and closing statement summarizing the basis on which the determination was made.

If the allegations are found to have merit, a certified letter shall be sent by Senior Access to the Complainant that contains the results of the investigation, recommendations and detailed plan of action as well as a means and time frame for follow-up to the recommendations. The complainant or his/her representative will be advised of each step of the process by Senior Access.

## Title VI Complaint Form

Name: \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_

Home Telephone #: \_\_\_\_\_ Work Telephone #: \_\_\_\_\_

Were you discriminated against because of:

\_\_\_\_\_ Race \_\_\_\_\_ National Origin \_\_\_\_\_ Color

\_\_\_\_\_ Other: (Explain) \_\_\_\_\_

Date of Alleged Incident: \_\_\_\_\_

Explain as clearly as possible what happened and how you were discriminated against. Indicate who was involved. Be sure to include the names and contact information of any witnesses. If more space is needed please use the back of the form.


Have you filed this complaint with any other Federal, State, or Local Agency; or any Federal or State Court? \_\_\_\_\_ Yes \_\_\_\_\_ No

If yes, check all that apply:

\_\_\_\_\_ Federal Agency \_\_\_\_\_ Federal Court \_\_\_\_\_ State Agency  
\_\_\_\_\_ State Court \_\_\_\_\_ Local Agency

Please provide information about a contact person at the agency/court where the complaint was filed.

Name: \_\_\_\_\_

Address: \_\_\_\_\_

City, State, and Zip Code: \_\_\_\_\_

Telephone: \_\_\_\_\_

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

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Signature

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Date

Please mail this form to:

Senior Access

Serita Lacasse, Executive Director 2498

E Palm Valley Blvd

Round Rock, TX 78665



### List of Title VI Complaints against Senior Access

The following are details regarding transit-related active investigations, lawsuits, and complaints that allege that Senior Access staff has discriminated on the basis of race, color, creed, national origin, sex, or age.

	Date (Month, Day, Year)	Summary (include basis of complaint: race, color, or national origin)	Status	Action(s) Taken
<b>Investigations</b>				
1.				
2.				
<b>Lawsuits</b>				
1.				
2.				
<b>Complaints</b>				
1.				
2.				

Currently Senior Access has no complaints lodged against it with regards to Title VI. Dated 9-17-19



## Public Participation Plan

Community Outreach is a requirement of Title VI. Senior Access as a recipient of Title VI funding, shall seek out and consider the viewpoints of minority and low-income populations in the course of conducting public outreach. Senior Access makes the following community outreach efforts to better include all client populations in decision-making processes:

1. Client populations are invited to and encouraged to give feedback on services rendered by Senior Access via annual satisfaction surveys.
2. Senior Access' Title VI statements are posted in all Senior Access offices and online.
3. A contact number can be provided by Senior Access for individuals requiring special accommodations, including but not limited to deaf interpreters and translators for alternate languages.
  - a. Upon request, and within a reasonable time frame, Senior Access shall make every effort to render plans and documents in alternative languages and formats.

Senior Access has engaged the public in its planning and decision making processes, as well as its marketing and outreach activities. To date, we have made the following community outreach efforts:

- Client populations have been invited annually to give feedback on services rendered by Senior Access via annual, anonymous satisfaction surveys.
- Outreach to civic groups, churches, international groups and community agencies in the Greater Austin Metropolitan area.
- Citizens may call Senior Access at 512-310-1060 to lodge a complaint or comment. All complaints/comments are logged and investigated.
- Brochures outlining Title VI policies and procedures are available in English and Spanish.

Failure to exactly comply with all Plan element shall not constitute a failure of public process, nor render any actions or decisions invalid.

# Volunteer & Client 2018 Surveys

## Volunteers:

### Questions and results:

1. How appreciated do you feel? 94% stated very
2. How satisfied are you with communication? 93% stated very
3. How easy was the volunteer training? 94% stated very
4. How satisfied are you with using assisted rides? 94% very
5. How likely are you to continue volunteering? 95% Very

### Clients Results:

1. Senior Access helps increase my independence by providing me the ability to get out and around town: 96% agree
2. Because I have a Volunteer I feel I have close ties to more people: 92% agree
3. I can better monitor my health issues when I have reliable transportation to medical appointments: 93% agree
4. Senior Access is personalized enough to change as my needs change: 90% agree
5. If not free, I would most likely go on fewer medical appointments: 80% agree



# **Senior Access**

## **Limited English Proficiency Plan**

**September 17, 2019**

**TITLE VI COORDINATOR**

**Serita Lacasse**

**2498 E. Palm Valley Blvd. Round Rock, Texas 78665**

**(512) 310-1060**

## INTRODUCTION

This *Limited English Proficiency Plan* has been prepared to address the Senior Access responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English proficiency language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C 2000d, et seq, and its implementing regulations, which state that no person shall be subjected to discrimination on the basis of 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 or understand 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 Senior Access departments receiving federal funds.

### Plan Summary

Senior Access has developed this ***Limited English Proficiency Plan*** to help identify reasonable steps for providing language assistance to persons with limited English proficiency (LEP) who wish to access services provided. 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, the ways in which assistance may be provided, staff training that may be required, and how to notify LEP persons that assistance is available.

In order to prepare this plan, Senior Access 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 by Senior Access.
2. The frequency with which LEP persons come in contact with Senior Access services.
3. The nature and importance of services provided by Senior Access to the LEP population.
4. The interpretation services available to Senior Access and overall cost to provide LEP assistance. A summary of the results of the four-factor analysis is in the following section.

## FOUR-FACTOR ANALYSIS

Senior Access serves three counties in Central Texas. They are Bastrop, Travis and Williamson counties. Our mission is to provide transportation and support to older adults to enhance their independence and well-being. Senior Access provides access to healthcare and daily needs by providing transportation and support services.

The 2010 census has spurred Senior Access to assess its communication within each county. The table below represents the results of the census.

County	Population	# of Persons Speak a Language other than English		# of Persons who do not Speak English "Very Well"		Spanish	Indo-European	Asian or Pacific Island or Other	
Travis	1,024,266	286,963	28%	123,846	12%	104,076 11%	5,010 1%	14,760	2%
Williamson	422,679	71,473	17%	23,597	5.6%	17,728 5%	2,238 1%	3,631	1%
Bastrop	74,171	5,994	17%	4631	8.7%	5185 14%	724 2.05%	67	.19%

### 1. The number or proportion of LEP persons in the service area who may be served by Senior Access services.

Senior Access staff reviewed the 2000 U.S. Census Report and determined that (364,430) persons in Bastrop, Travis and Williamson Counties (23.9%) of the population speak a language other than English. Of those (364,430) persons (152,074) [(41.7%)] have limited English proficiency; that is, they speak English "not well" or "not at all", this is only a (.10%) of the overall population in the service area. In Senior Access service area Bastrop, Travis and Williamson Counties, of those persons with limited English proficiency, (126,989) speaks Spanish, (7,972) speak Indo-European, and (18,518) speak Asian or other Pacific Islander Languages.

### 2. The frequency with which LEP persons come in contact with Senior Access services.

Senior Access staff reviewed the frequency with which the board, office staff and drivers have, or could have, contact with LEP persons. This includes documenting phone inquiries or office visits. To date, Senior Access has had (0) requests for interpreters and (0) requests for translated

program documents. The board, office staff and drivers have had very little contact with LEP persons.

**3. The nature and importance of services provided by Senior Access to the LEP population.**

There is no large geographic concentration of any type of LEP individuals in the service area for SENIOR ACCESS. in Bastrop, Travis and Williamson Counties. The overwhelming majority of the population, (75.3% speak only English. As a result, there are few social, service, professional and leadership organizations within the Senior Access service area that focus on outreach to LEP individuals. Senior Access board, office staff and drivers are most likely to encounter LEP individuals through bus/van rides, office visits, phone conversations, and attendance at board meetings.

**4. The interpretation services available to Senior Access and overall cost to provide LEP assistance. A summary of the results of the four-factor analysis is in the following section.**

Senior Access reviewed its available resources that could be used for providing LEP assistance, which of its documents would be most valuable to be translated if the need should arise, and contacted local citizens that would be willing to provide voluntary Spanish translation if needed within a reasonable time period. Other language translation if needed would be provided through a telephone interpreter line for which Senior Access would pay a fee.



## **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 Senior Access 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.

How does staff identify an LEP person who needs language assistance:

- Post notice of LEP Plan and the availability of interpretation or translation services free of charge in languages LEP persons would understand.
- All staff will be informally surveyed periodically on their experience concerning any contacts with LEP persons during the previous year.
- When an informational meeting or event, a staff person will 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.

## **LANGUAGE ASSISTANCE MEASURES**

Although there is a very low percentage in Senior Access service area of LEP individuals, that is, persons who speak English "not well" or "not at all", it will strive to offer the following measures:

- Senior Access staff will take reasonable steps to provide the opportunity for meaningful access to LEP clients who have difficulty communicating in English.
- The following resources will be available to accommodate LEP persons:
  - Staff interpreters for the Spanish language 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.

## **STAFF TRAINING**

The following training will be provided to all staff:

- Information on the Title VI Policy and LEP responsibilities.
- Description of language assistance services offered to the public.
- Documentation of language assistance requests.
- How to handle a potential Title VI LEP complaint.

**All contractors or subcontractors performing work for Senior Access will be required to follow the Title VI LEP guidelines.**

## **TRANSLATION OF DOCUMENTS**

- Senior Access weighed the cost and benefits of translating documents for potential LEP groups. Considering the expense of translating the documents, the likelihood of frequent changes in documents and other relevant factors, at this time it is an unnecessary burden to have any documents translated.
- Due to the very small local LEP population, Senior Access does not have a formal outreach procedure in place, as of 2019. Translation resources have been identified and are limited in this region. However, when and if the need arises for LEP outreach, Senior Access will consider the following options:
  - 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**

### **Monitoring and Updating the LEP Plan:**

Senior Access will update the LEP Plan as required. At a minimum, the plan will be reviewed when data from the next U.S. Census is available, or when it is clear that higher concentrations of LEP individuals are present in Senior Access 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 Senior Access financial resources are sufficient to fund language assistance resources needed.
- Determine whether Senior Access 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.

### **DISSEMINATION OF SENIOR ACCESS LEP PLAN**

All staff in Senior Access will be trained on the LEP Plan. In addition, the Outreach staff will be trained on the LEP Plan.



Senior Access Board Profile 2019

Areas of Expertise	Matt	Margaret	Tyson	Barbara	Jeff	Jim	Deanna	Heather	Tony	Brandy
Academic				X			X		X	
Accounting		X	X	X			X			
Administration	X	X	X	X			X	X		
Banking/Trusts					X		X			
Business/Corporation		X	X		X		X		X	
Conflict Resolution			X	X						
Fundraising			X	X		X		X	X	
Gov't Representation	X			X		X				X
Health/Medical			X							
Investments					X				X	
Law										X
Marketing			X	X		X		X		
Nonprofit experience				X		X	X	X	X	
Org and Financial Mgmt		X	X	X	X	X	X			
Personnel		X	X	X	X			X	X	
Public service	X					X				X
Real Estate	X		X							
Retail /consumer goods			X			X				X
Strategic planning		X	X		X	X				
Technology		X	X	X		X				
Senior Access Experience	X	X	X	X	X	X	X	X	X	X
Visionary Thinking		X	X	X		X				
Under 35										
35-50	X		X	X	X					X
51-65		X				X	X	X		
Over 65									X	
Male	X		X		X	X			X	
Female		X		X			X	X		X
African American										
Asian										
Caucasion	X	X	X		X	X		X	X	
Hispanic				X					X	







## BOARD MINUTES

9/17/19

**Those In Attendance:** Matt Baker, Barbara Najera, Tyson Murphy, Heather Bridges, Margaret Ballinger, Tony Delgado, Jeff Stefek

**Staff:** Serita Lacasse

### Routine Matters:

- Call to Order @ 4:00 pm, Quorum Met, Opening Prayer by Tyson
- Minutes
  - Jeff makes a motion to approve. Heather seconds. All approved.
- Financial Reports
  - Margaret updated the board on the financials.
  - Round Rock Community Fund balance should be addressed on November Agenda
  - Tony makes a motion to approve financials. Jeff seconds. All approved.
- ED Report
  - Serita updated the board on the Executive Director Report

### Old Business:

- Community Outreach Coordinator Update
  - Discussion on Carter's position
- Trends of Rides
  - New graph to be created showing data separated by year.
- Budget committee update
  - No information to present

### New Business:


- Leadership Round Rock
  - Discussion about Sherrie attending Leadership Round Rock Event to pass out applications for volunteers. Membership is 1 year. Tyson makes a motion to approve an employee of Senior Access to become a member at \$1300 cost as well as looking into Matt's discount. Margaret seconds. All approved.
- New Proposal Fundraising Idea to use rather than golf
  - Serita discussed with the board. Discussion will continue at the next board meeting.
- Discussion about taking clients to Church on Sundays
  - Serita will be doing research on this possibility
- Christmas Concert needs
  - Serita updated the board on sponsors and other event details.
- Officer Committee
  - Jeff Stefek, Heather Bridges, Tyson Murphy
- New Board members
  - Discussion about board members who are terming out and the potential to bring in new members.
- Presentation and Discussion of Title VI program
  - We reviewed and discussed the Title VI plan and approved it during this board meeting. Motion: Tyson Murphy Second: Tony Delgado. Approved Unanimously

**Executive Session: As Needed**

**Upcoming Dates:**

- Board Meeting: October 15<sup>th</sup> at 4 p.m
- Board Meeting: November 19<sup>th</sup> at 4 p.m.
- Staff/ Board Holiday Party: December 17<sup>th</sup> at 6 at Serita's
- Volunteer Appreciation November 7<sup>th</sup> 11:30 am at Wingate
- Christmas Concert December 8<sup>th</sup> 6:00 p.m. FUMC Round Rock
- Grand Adults Christmas Party: December 13<sup>th</sup> at FUMC- Pflugerville 9:30-12p.m
- Office Closed: December 20<sup>th</sup>-January 2<sup>nd</sup>. Staff returns the 3<sup>rd</sup> and rides resume the 6<sup>th</sup>.  
Holiday Van rides will be set up for the weeks to HEB only.

Adjourned at 5:05pm

  
Barbara Najera  
Secretary

9/17/19