

TITLE VI PLAN

Senior Meals & Services, Inc

Title VI prohibits discrimination in all Federal Transit Administration (FTA) services, programs, or benefits on the basis of Race, Color, or National Origin.

Title VI Program

FTA Circular 4702.1B, Chapter III for FTA , Subrecipient:

Title VI Requirements & Guidelines for FTA Recipients at

<https://www.transit.dot.gov/regulations-and-guidance/fta-circulars/title-vi-requirements-and-guidelines-federal-transit>

The Federal Transit Administration Title VI Circular 4702.1B provides guidance to grantees on how to comply with Title VI regulations, as well as to ensure grantees provide meaningful language access to persons who are limited English proficient. The circular provides specific compliance information for each type of grantee and provides comprehensive appendices including additional guidance and examples to ensure recipients understand the requirements.

By filling out the required fields you are stating that your board of directors, appropriate government entity, or officials responsible for policy decisions and/or approval of board meeting minutes understand the required FTA Circular 4702.1B, Chapter III regulations and agree to adopt all Title VI Program guidelines:

Date: 2-17

Title VI Contact Name: Cathy Saele-Odendaal

Title VI Contact Phone: 701-662-5061

Title VI Contact Email: sms@gondtc.com

Title VI Program Requirements

[Attach a copy of the meeting minutes approving this action.]

Title VI Program Requirement

1. SENIOR MEALS & SERVICES, INC TITLE VI AND NON-DISCRIMIINATION POLICY STATEMENT

Senior Meals and Service developed a Title VI and Non-discrimination policy statement. This statement is posted in the office and in the bus garage.

VITAL DOCUMENT – Translate if significant LEP population.

An abbreviated “Statement of Non-discrimination” template titled Title VI Plaque has been created and is posted in all vehicles.

VITAL DOCUMENT – Translate if significant LEP population.

2. COMPLAINT FORM:

Senior Meals & Services adopt NDDOTs Complaint Form SFN 51795 are available in the office or can be found on at

<http://webbuilder.nationalrap.org/seniormealsandservices/Routes-Schedules>. All complaints forms should be mailed to Senior Meals and Services at 202 4th Ave NE, Devils Lake, ND 58301.

VITAL DOCUMENT – TRANSLATE if significant LEP population.

3. COMPLAINT LOG:

Senior Meals & Services adopted NDDOTs Transit Title VI – List of Investigations, Lawsuits, and Complaints, SFN 60805.

4. MINORITY REPRESENTATION ON PLANNING AND ADVISORY BOARDS:

Senior Meals & Services, Inc has a **non-elected** transit related planning board, advisory council, or committee, please submit:

Board, Council, or Committee Name	Member	White M/F	American Indian M/F	Hispanic M/F	Black M/F	Pacific Islander M/F	Asian M/F
At Large	Dean Petska	M					
Center Management Board Rep	Doris Myklebust	F					
Devils Lake City Commission Rep	Ben Sander	M					
At Large	Mike Connor	M					
MDU	Barry Gage	M					
Ed Brown	Ramsey Co.	M					

	Commissioner						
	Mary Alexander	F					
	Nancy Lundo	F					
unfilled	Benson Co. Rep						
unfilled	Eddy Co. Rep						

- No significant minorities in the area.

5. PUBLIC PARTICIPATION PLAN:

Senior Meals & Services has submitted a Public Participation Plan as part of their Title VI Program specific to their agency using the template titled Public Participation Plan Template

Communication will be ongoing with Social Services, Community Options, Vocational Rehabilitation, Human Services Center and nursing homes in the area ensuring community needs are met.

6. LIMITED ENGLISH PROFICIENCY (LEP) PLAN:

Senior Meals & Services submitted a Limited English Proficiency (LEP) Plan as part of their Title VI Program in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq, and Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency using the template developed by NDDOT.

FORMAL APPROVAL POLICY

This Policy has been approved by the Senior Meals and Services, Inc Board of Directors and will be strictly adhered to.


 Board of Directors

Senior Meals and Services, Inc.

2-28-17
 Date of Approval

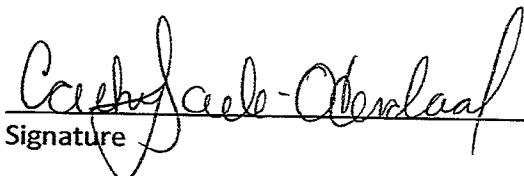
Senior Meals & Services, Inc
TITLE VI AND NON-DISCRIMINATION POLICY STATEMENT

Senior Meals & Services, Inc hereinafter referred to as the "TRANSIT AGENCY" is committed to compliance with Title VI of the Civil Rights Act of 1964 and all related regulations and statutes. The TRANSIT AGENCY assures that no person or groups(s) of persons shall, on the grounds of race, color, or national origin, 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 the TRANSIT AGENCY, regardless of whether those programs and activities are federally funded or not.

The TRANSIT AGENCY also assures that every effort will be made to prevent discrimination through the impacts of its programs, policies, and activities on minority and low-income populations. In addition, the TRANSIT AGENCY will provide meaningful access to services for persons with Limited English Proficiency for language assistance free of charge to the person upon request.

In the event the TRANSIT AGENCY distributes federal-aid funds to a subrecipient, the TRANSIT AGENCY will include Title VI language in all written agreements and will monitor for compliance.

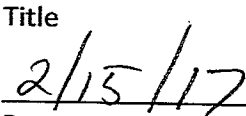
The TRANSIT AGENCY's Title VI Coordinator Cathy Saele-Odendall, Executive Director, 701-662-5061, sms@gondtc.com is responsible for initiating and monitoring Title VI activities, preparing reports and other responsibilities as required by 23 Code of Federal Regulations (CFR) 200 and 49 CFR 21.



Signature

Executive Director

Title



Date

2/2017

STATEMENT OF NON-DISCRIMINATION

Under Title VI of the Civil Rights Act of 1964, and its related statutes and regulations, no person or groups of persons shall be, on the grounds of race, color, or national origin be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any and all programs or activities funded in whole or in part with Federal funds.

Contact the Project Director at 701- 662-5061 _____ to request additional information on our nondiscrimination obligations or to file a complaint. Persons with limited English proficiency may receive language assistance free of charge upon request.

Senior Meals & Services, Inc

**This Transportation service is
Open to the PUBLIC**

STATEMENT OF NON-DISCRIMINATION

Under Title VI of the Civil Rights Act of 1964, and its related statutes and regulations, no person or groups of persons shall be, on the grounds of race, color, or national origin be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any and all programs or activities funded in whole or in part with Federal funds.

Contact the Project Director at 701- 662-5061 _____ to request additional information on our nondiscrimination obligations or to file a complaint. Persons with limited English proficiency may receive language assistance free of charge upon request.

Senior Meals & Services, Inc

**This Transportation service is
Open to the PUBLIC**

Instructions

GENERAL

1. Under Title VI of the Civil Rights Act of 1964 and the related statutes and regulations, no person or groups(s) of persons shall, on the grounds of race, color or national origin 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 **(TRANSIT AGENCY)**. Any person or groups(s) of persons who feel they have been discriminated against may file a complaint.
2. Instructions provided within this form are not meant to be all inclusive. Complainants are responsible for all procedural requirements.
3. Complainants **must** include all required information and **must** meet all timeframes as defined in the **(TRANSIT AGENCY)** Title VI Complaint Procedure.
4. Legible copies of all available pertinent documentation should be attached to this form.
5. All inquiries should be directed to **(Name of Title VI Coordinator, TRANSIT AGENCY, Street Address/P.O. Box, City, State, Zip Code, Telephone, TTY)**.

PART I

Complete all information in this section.

PART II

Check all boxes that apply indicating the basis for the complaint. The discrimination **must** be based on at least one of the listed categories.

PART III

State the specific complaint in a manner that clearly identifies the issues upon which the complaint is based.

PART IV

State the minimum remedy acceptable for resolution of this complaint.

PART V

Sign and date this section to verify the information contained in Parts I through IV.

Complaints filed with Federal Transit Administration

Discrimination complaints based on race, color, or national origin may be filed with the Federal Transit Administration at the FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590. The complaint **must** be filed, in writing, no later than 180 days after the date of the alleged discrimination, unless the time for filing is extended by the Secretary, U.S. Department of Transportation.

Senior Meals & Services, Inc TRANSIT TITLE VI COMPLAINT FORM

PART I - COMPLAINANT INFORMATION (Print all items legibly.)

Name		Telephone
Street Address/P.O. Box		Email Address
City	State	Zip Code

PART II - CAUSE OF DISCRIMINATION BASED ON [Check all appropriate box(es).]

Race Color National Origin

PART III - THE PARTICULARS ARE: (Include names, dates, places, and incidents involved in the complaint.) [If additional space is needed, attach extra sheet(s).]

PART IV - REMEDY SOUGHT [State the specific remedy sought to resolve the issues(s).]

PART V - VERIFICATION

Complainant's Signature _____ Date _____

TRANSIT TITLE VI - LIST OF INVESTIGATIONS, LAWSUITS, AND COMPLAINTS

North Dakota Department of Transportation, Local Government Division
SFN60805 (03-2015)

Name of Transit Provider/Agency Senior Meals and Services
--

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 Federal Transit Administration (FTA) and entities other than FTA;
- Lawsuits; and
- Complaints naming the recipient.

Providers must submit form upon receipt of notification of complaint and annually upon request by the NDDOT Transit Section. Please attach additional documentation as needed. If you have not had any investigations, lawsuits, or complaints, please enter "None" in each category on the annual report.

	DATE (MM/DD/YYYY)	SUMMARY OF ALLEGATION(S) (include basis of complaint: race, color or national origin)	CURRENT STATUS	ACTION(S) TAKEN/FINAL FINDINGS
INVESTIGATIONS	1.	None		
	2.			
	3.			
	4.			

LAWSUITS	1.	None		
	2.			
	3.			
	4.			

COMPLAINTS	1.	None		
	2.			
	3.			
	4.			

Name (Type or Print) Cathy Saele-Odendaal	
Signature <i>Cathy Saele-Odendaal</i>	Date 2/23/17

		Start Date	Reelected	Term Expires
	Devils Lake			
1	Dean Petska At Large	Jul 94	Jul 09	Jul 19
2	Doris Myklebust Center Management Board Rep	Jul 08/Jun 13		Until Replaced
3	Ben Sander Devils Lake City Commission Rep	Jul 16		Until Replaced
4	Mike Connor At Large	Jul 95	Jul 10	Jul 19
5	Barry Gage MDU	Dec 08		Until Replaced
	Benson (Minnewaukan)			
6	Benson Co. Rep			Until Replaced
	Eddy (New Rockford)			
7	Eddy Co. Rep			Until Replaced
8	Ed Brown Ramsey Co. Commissioner			Until Replaced
9	Mary Alexander	Jul 13		Jul 19
10	Nancy Lundon	Jul 13		Jul 19

TITLE VI PUBLIC PARTICIPATION PLAN

SENIOR MEALS & SERVICES, INC

Cathy Saele-Odendaal

Executive Director

202 4th Ave NE

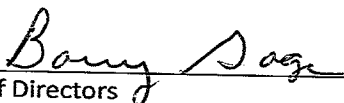
Devils Lake, ND 58301

701-662-5061

2-15-17

FORMAL APPROVAL POLICY

This Policy has been approved by the Senior Meals and Services, Inc
Board of Directors and will be strictly adhered to.



Board of Directors

2-28-17
Date of Approval

Senior Meals and Services, Inc.

Every three years, on a date determined by North Dakota Department of Transportation (NDDOT), each Senior Meals & Services is required to submit the following plan as part of their Title VI Program. For immediate reference please review page(s) 25-26 of FTA C 4702.1B. Additional information can be found on page(s) 20-31 of FTA C 4703.1.

Below you will find an outline of the Title VI Public Participation Plan, as required by USDOT Federal Transit Administration. This document explicitly describes the proactive strategies, procedures, and desired outcomes for the Senior Meals & Services's public participation activities.

1. General Information Section

The Federal and State government mandate public involvement, because it helps to guide department decisions in providing public transportation services. Public involvement also benefits Senior Meals & Services, Inc and the public by allowing for the development of services that meet the needs of area citizens/customers.

The Federal government mandates public involvement prior to raising fares, implementing major reductions in service, or applying for grants/loans to finance transportation improvement projects.

2. Public Participation/Engagement

Senior Meals & Services has wide latitude to determine how, when, and how often specific public participation activities should take place, and which specific measures are most appropriate.

a. Public Meetings

- i. Monthly Board meetings are open to the public and announced in the newspaper. Communication will be ongoing with Social Services, Community Options, Vocational Rehabilitation, Human Services Center and nursing homes in the area ensuring community needs are met.
- ii. Meetings are published in the local newspapers informing the public about the meetings and adgenda.

b. Coordination

- i. Other agencies – Local churches, local food pantry, medical facilities, social services, educational institutions, and other organizations provide a medium to educate and solicit feedback on current services.
- ii. Community events – foot care clinic, Pie Socials, contact with Lake Area Career & Technical Center, and other community events serve as a way to provide education about your services

- iii. Interpretation services available by Google Translate.

c. Public Studies

As per requirements of [49 U.S.C. Sections 5307(b)] and [5307(c)(1)] Senior Meals & Services will develop and/or consider a process to study public comment before raising a fare or carrying out a major reduction in transportation services.

Senior Meals & Services conducts an annual meeting and customer surveys are posted on their website, office, and on all buses.

Public Outreach Plan

- a. Senior Meals & Services utilizes local television channels, community calendar, radio shows and newspaper ads.
- b. Outreach to minority, LEP, and other underserved populations:
 - i. Ongoing communication with Social Services, Community Options, Vocational Rehabilitation, Human Services Center and nursing homes in the area local, churches, VFW and schools in the area ensuring community needs are met.
 - ii. Meetings with organizations are attended to gain knowledge of the needs of communities members to better serve the entire community.

5. Type of Public Involvement

- a. What public should be involved:

It is important to involve as many individuals as possible in order to gain the support and development of public transportation.

- Current riders
- Non-riders
- Business and community leaders/groups
- Government officials
- City Council and other City Departments
- Faith based community
- Academia and educational institutions

- Medical facilities/long term care centers
- Social Service Agencies
- Veterans

2/2017

Limited English Proficiency Plan

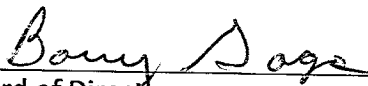
Senior Meals & Services, Inc

February 2017

TITLE VI COORDINATOR
Cathy Saele-Odendaal, Executive Director
202 4th Ave NE
Devils Lake, ND 58301
701-662-5061

FORMAL APPROVAL POLICY

This Policy has been approved by the Senior Meals and Services, Inc
Board of Directors and will be strictly adhered to.



Board of Directors

Senior Meals and Services, Inc.

2-28-17

Date of Approval

DATE DOCUMENT DEVELOPED

INTRODUCTION

This *Limited English Proficiency Plan* has been prepared to address the Senior Meals & Services, Inc 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, write 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 Meals & Services, Inc, departments receiving federal grant funds.

Plan Summary

The Senior Meals & Services, Inc 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 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, the Senior Meals & Services, Inc used the four-factor LEP analysis which considers the following factors:

1. The number or proportion of LEP persons in the service area who may be served by the Senior Meals & Services, Inc
2. The frequency with which LEP persons come in contact with Senior Meals & Services, Inc services.
3. The nature and importance of services provided by the Senior Meals & Services, Inc to the LEP population.
4. The interpretation services available to the Senior Meals & Services, Inc and overall cost to provide LEP assistance. A summary of the results of the four-factor analysis is in the following section.

MEANINGFUL ACCESS: FOUR-FACTOR ANALYSIS

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

The Senior Meals & Services, Inc staff reviewed the 2010 U.S. Census Report and determined that 519 (49 persons in Eddy County and 470 persons in Ramsey County) in Senior Meals & Services, Inc [2.15 % of the population in Eddy County, and 4.61% in Ramsey County] speak a language other than English. Of those 519 persons 100 [0.9%] in Ramsey County and 19 [0.8%] in Eddy County, have limited English proficiency; that is, they speak English "not well" or "not at all", this is only a .08% of the overall population in the service area. In **Senior Meals & Services, Inc** service area, of those persons with limited English proficiency, 5 speak Spanish, 16 speak Indo-European, and 3 speak Asian or other Pacific Islander Languages.

2. The frequency with which LEP persons come in contact with Senior Meals & Services, Inc services.

The Senior Meals & Services, Inc staff reviewed the frequency with which the board/council, office staff and bus/van drivers have, or could have, contact with LEP persons. This includes documenting phone inquiries or office visits. To date, the Senior Meals & Services, Inc has had no requests for interpreters and no requests for translated program documents. The board/council, office staff and bus/van drivers have had very little contact with LEP persons.

3. The nature and importance of services provided by the Senior Meals & Services, Inc to the LEP population.

There is no large geographic concentration of any type of LEP individuals in the service area for the Senior Meals & Services, Inc the overwhelming majority of the population, 99.5%, speak only English. As a result, there are few social, service, professional and leadership organizations within the Senior Meals & Services, Inc service area that focus on outreach to LEP individuals. The Senior Meals & Services, Inc board/council, office staff and bus/van drivers are most likely to encounter LEP individuals through bus/van rides, office visits, phone conversations, and attendance at Board/Council meetings.

4. The resources available to the Senior Meals & Services, Inc and overall costs to provide LEP assistance.

The Senior Meals & Services, Inc 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 use Google translate to provide translation if needed within a reasonable time period. Other language translation if needed would be provided through a telephone interpreter line for which the Senior Meals & Services, Inc 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 Meals & Services, Inc services. Language assistance can include interpretation, which means oral or spoken transfer of a message from one language into another language and/or translation, which means the written transfer of a message from one language into another language.

How the Senior Meals & Services, Inc staff may 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 Senior Meals & Services, Inc staff will be provided with "I Speak" cards to assist in identifying the language interpretation needed if the occasion arises.
- All Senior Meals & Services, Inc staff will be informally surveyed periodically on their experience concerning any contacts with LEP persons during the previous year.
- When the Senior Meals & Services, Inc sponsors an informational meeting or event, an advanced public notice of the event should be published including special needs related to offering a translator (LEP) or interpreter (sign language for hearing impaired individuals). Additionally, a staff person may greet participants as they arrive. By informally engaging participants in conversation it is possible to gauge each attendee's ability to speak and understand English. Although translation may not be able to be provided at the event it will help identify the need for future events.

Language Assistance Measures

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

1. The Senior Meals & Services, Inc staff will take reasonable steps to provide the opportunity for meaningful access to LEP clients who have difficulty communicating English.
2. The following resources will be available to accommodate LEP persons:
 - Language interpretation will be accessed through Google translate available on the tablets in the buses.
 - 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.
- Use of the "I Speak" cards.
- Documentation of language assistance requests.
- How to handle a potential Title VI/LEP complaint.

All contractors or subcontractors performing work for the Senior Meals & Services, Inc will be required to follow the Title VI/LEP guidelines.

TRANSLATION OF DOCUMENTS

The Senior Meals & Services, Inc 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, the Senior Meals & Services, Inc does have a formal outreach procedure in place, as of 2017. Translation resources have been identified and are limited in this region. However, when and if the need arises for LEP outreach, the Senior Meals & Services, Inc 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 - The **Senior Meals & Services, Inc** will update the LEP Plan as required. At a minimum, the plan will be reviewed and updated when data from the 2010 U.S. Census is available, or when it is clear that higher concentrations of LEP individuals are present in the Senior Meals & Services, Inc_service area. Updates will include the following:

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

DISSEMINATION OF THE Senior Meals & Services, Inc LEP PLAN

- Post signs in the office and on the web site locations notifying LEP persons of the LEP Plan and how to access language services.
- State on agendas and public notices in the language that LEP persons would understand that documents are available in that language upon request at 701-662-5061.

2/2017