

Title VI Plan
Jay-Randolph Developmental Services Inc

Adopted on: August 19,2014

Adopted by: Jay-Randolph Developmental Services
Inc.

Revised on: October 2, 2017
September 15, 2020

This policy is hereby adopted and signed by:

Jay-Randolph Developmental Services Inc

Chairperson

Name/Title: Cheryl Zell, Board President

Chairperson Signature:

Cheryl Zell

Policy Statement

Jay-Randolph Developmental Services Inc as a recipient of Federal Transit Administration (FTA) grant dollars either directly from FTA or through the Indiana Department of Transportation (INDOT) will comply with the Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), and the U.S. Department of Transportation implementing regulations.

Title VI Plan Elements

Jay-Randolph Developmental Services Inc Title VI plan includes the following elements:

1. *Evidence of Policy Approval*
2. *Notice to the Public*
3. *Complaint Procedure*
4. *Complaint Form*
5. *List of transit related Title VI Investigations, Complaints and Lawsuits*
6. *Public Participation Plan*
7. *Language Assistance Plan*
8. *Minority Representation Table*

TITLE VI Notice to the Public

Jay-Randolph Developmental Services Inc Notice to the Public is as follows:

Notifying the Public of Rights Under Title VI

Jay-Randolph Developmental Services Inc

- ✓ Jay-Randolph Developmental Services Inc operates its programs and services without regard to race, color, or national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory due to your race, color, or national origin may file a complaint with Jay-Randolph Developmental Services Inc.
- ✓ For more information on Jay-Randolph Developmental Services Inc civil rights program, and the procedures to file a complaint, contact (260) 726-7931; email jrds@jrds.org; or visit our administrative office at 901 East Water Street, Portland, Indiana 47371. For more information, visit www.jrds.org
- ✓ A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.
- ✓ If information is needed in another language, contact (800) 726-7931.
Si se necesita informacion en otro idioma de contacto, (800) 726-7931

Jay-Randolph Developmental Services Inc Notice to the Public is posted in the following locations:
(check all that apply)

- ✓ Agency website www.jrds.org
- ✓ Public areas of the agency office (common area, public meeting rooms, etc.)
- ✓ Inside vehicles
- Rider Guides/Schedules
- Other, _____

Title VI/ADA Complaint Procedure Jay-Randolph Developmental Services Inc

Title VI of the Civil Rights Act of 1964 provides that any person who believes he or she has been discriminated against on the basis of race, color or national origin by Jay-Randolph Developmental Services Inc may file a formal complaint.

Similarly, The Americans with Disabilities Act of 1990 (ADA) prohibits discrimination and ensures equal opportunity and access for persons with disabilities. Any person who believes he or she has been discriminated against based on disability may also file a formal complaint with Jay-Randolph Developmental Services Inc.

Any person who believes she or he has been discriminated against on the basis of race, color, or disability by Jay-Randolph Developmental Services Inc may file a Title VI/ADA complaint by completing and submitting the agency's Title VI/ADA Complaint Form. Jay-Randolph Developmental Services Inc investigates complaints received no more than 180 days after the alleged incident. Jay-Randolph Developmental Services Inc will only process complaints that are complete.

Once the complaint is received, Jay-Randolph Developmental Services Inc will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office.

Jay-Randolph Developmental Services (JRDS) Inc has 10 days to investigate the complaint. If more information is needed to resolve the case, JRDS may contact the complainant. The complainant has 10 business days from the date of the letter to send requested information to the investigator assigned to the case.

If the investigator is not contacted by the complainant or does not receive the additional information within 10 business days, Jay-Randolph Developmental Services Inc can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

After the investigator reviews the complaint, she/he will issue one of two (2) letters to the complainant: a closure letter or a letter of finding (LOF).

- ✓ A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed.
- ✓ A letter of finding (LOF) summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member, or other action will occur.

If the complainant wishes to appeal the decision, she/he has 15 days after the date of the letter or the LOF to do so.

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

If information is needed in another language, then contact 800-726-7931.

Title VI/ADA Complaint Form

Jay-Randolph Developmental Services Inc

Section I:				
Name:				
Address:				
Telephone (Home):			Telephone (Work):	
Electronic 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 of the person for whom you are complaining:				
Please explain why you have filed for a third party: _____				
Please confirm that you have obtained the 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):				
Title VI:	<input type="checkbox"/> Race	<input type="checkbox"/> Color	<input type="checkbox"/> National Origin	
Other:	<input type="checkbox"/> ADA			
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 name and contact information of the person(s) who discriminated against you (if known) as well as 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/ADA 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?				

<input type="checkbox"/> Yes	<input type="checkbox"/> 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 _____
Please provide information about a contact person at the agency/court where the complaint was filed.	
Name:	
Title:	
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:

Printed Name

Signature Date

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

Jay-Randolph Developmental Services Inc
 901 East Water Street
 Indiana, Indiana 47371

List of Transit Related Title VI/ADA Investigations, Complaints and Lawsuits

Jay-Randolph Developmental Services Inc

There have been no investigations, complaint and/or lawsuits filed against us during the report period.

There have been investigations, complaints and/or lawsuits filed against us. *See list below. Attach additional information as needed.*

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

Public Participation Plan

Jay-Randolph Developmental Services Inc

This is a participation plan that includes an outreach plan to engage minority and limited English proficient populations. Jay-Randolph's targeted public participation plan for minority populations is a part of efforts that extends more broadly to include other constituencies that are traditionally underserved, such as people with disabilities, low-income, elderly and others.

PROMOTING INCLUSIVE PUBLIC PARTICIPATION. The content and considerations of Title VI, the Executive Order on LEP and the DOT LEP Guidance is integrated into Jay-Randolph's established public participation. JRDS makes determinations in this plan based on a demographic analysis of the population(s) affected, the type of plan, program, and/or service under consideration, the resources available, and how the greater set of JRDS service lines can assist transit with this plan.

Strategies and Desired Outcomes

To promote inclusive public participation, Jay-Randolph Developmental Services will use its resources available to employ the following strategies, as appropriate:

- Provide for early, frequent and continuous engagement by the public
- Expand traditional outreach methods coordinating with community and faith-based organizations, educational institutions, and other organizations to implement public engagement strategies that reach out specifically to members of affected minority and/or LEP communities.
- Select accessible and varied meeting locations and times
- Employ different meeting sizes and formats
- Use social media in addition to other resources as a way to gain public involvement
- Use radio, television or newspaper ads on stations and in publications that serve minority and/or LEP populations. Outreach to LEP populations may also include audio programming available on podcasts.

Language Assistance Plan

Plan Components

As a recipient of federal US DOT funding, Jay-Randolph Developmental Services Inc is required to take reasonable steps to ensure meaningful access to our programs and activities by limited-English proficient (LEP) persons.

Limited English Proficient (LEP): Refers to persons for whom English is not their primary language and who have a limited ability to read, write, speak or understand English. This includes those who have reported to the U.S. Census that they speak English less than very well, not well, or not at all.

Most individuals in Indiana read, write, speak and understand English. There are some individuals for whom English is not their primary language. If these individuals have a limited ability to read, write, speak, or understand English, they are considered limited English proficient, or “LEP.”

Jay-Randolph Developmental Services Inc Language Assistance Plan includes the following elements:

- The results of the *Four Factor Analysis*, including a description of the LEP population(s), served.
- A description of how language assistance services are provided by language
- A description of how LEP persons are informed of the availability of language assistance service
- A description of how the language assistance plan is monitored and updated
- A description of how employees are trained to provide language assistance to LEP persons
- Additional information deemed necessary

Jay-Randolph Developmental Services Inc

Summary of the Language Assistance Plan Components

Item #1 – Results of the Four Factor Analysis *(including a description of the LEP population(s) served)*

Factor 1 – Demography

Jay-Randolph Developmental Services Inc provides transportation services to seniors and/or individuals with disabilities in Jay and Randolph counties.

The US Census Bureau – American Fact Finder (2013-2018) reports the following languages spoken in **Jay and Randolph counties** – English and Spanish. After English, the second largest language group is Spanish.

The Safe Harbor Threshold is calculated by dividing the population estimate for a language group that “speaks English less than very well” by the total population of the county. The LEP Safe Harbor Threshold provision stipulates that for each LEP group that meets the LEP language threshold (5% or 1,000 individuals, whichever is less), **Jay-Randolph Developmental Services Inc** must provide translation of vital documents in written format for non-English speaking persons.

In our service area, with a population estimate of 43,843, 573 persons have identified themselves as Spanish speaking and “speaks English less than well”. This language group is less than 1% and below the 5% or 1,000 person threshold. This means **Jay-Randolph Developmental Services Inc** is not required to provide written translation of vital documents. All other language groups listed above are also below the safe harbor threshold. This means, at this time, **Jay-Randolph Developmental Services Inc** is also not required to provide written translation of vital documents in these languages.

In the future, if **Jay-Randolph Developmental Services Inc** meets the Safe Harbor Threshold for any language group, it will provide written translation of vital documents in such languages and consider measures needed for oral interpretation.

Factor 2 – Frequency

Jay-Randolph Developmental Services Inc staff will be trained on what to do when they encounter a person that speaks English less than well. **Jay-Randolph Developmental Services Inc** will track the number of encounters and consider making adjustments as needed to its outreach efforts to ensure meaningful access to all persons and specifically to LEP and minority populations of **Jay-Randolph Developmental Services Inc** programs and services.

Jay-Randolph Developmental Services Inc provides 2,900 rides to 110 persons per year. While formal data has not been collected, **Jay-Randolph Developmental Services Inc** has not encountered any LEP persons requesting the transportation resources within the last six months.

Factor 3 – Importance

Jay-Randolph Developmental Services Inc understands an LEP person with language barrier challenges also faces difficulties obtaining health care, education or access to employment. A transportation system is a key link to connecting LEP persons to these essential services.

Jay-Randolph Developmental Services Inc has identified activities and services which would have serious consequences to individuals if language barriers prevented access to information or the benefits of those programs. The activities and services include providing emergency evacuation instructions in our facilities, stations and vehicles and providing information to the public on security awareness or emergency preparedness.

Jay-Randolph Developmental Services Inc assessment of what programs, activities and services that are most critical included contact with community organization(s) that serve LEP persons, as well as contact with LEP persons themselves to obtain information on the importance of the types of services that are provided to the LEP populations.

Factor 4 – Resources and Costs

Employees are educated on the principles of Title VI and Jay-Randolph Developmental Services Inc.'s Language Assistance Plan. New employees will be provided guidance on the needs of clients served and how best to meet their needs.

An important discussion point is that of language assistance. If an employee needs further assistance related to LEP program participants, her/she will work with Jay-Randolph Developmental Services Inc. 's Title VI Coordinator to identify strategies to meet the language needs of the participants of the program or service.

Item # 2 – Description of how Language Assistance Services are Provided, by Language

Any language barriers or LEP assistance are identified through our intake process before a client begins services with our agency. At the time of intake, a translator will be made available to communicate our agency policies and procedures, including transportation. Additional tools will be determined at that time to assess the needs for future communication tools.

Item # 3 - Description of how LEP Persons are Informed of the Availability of Language Assistance Service

Any language barriers or LEP assistance are identified through our intake process before a client begins services with our agency.

Item # 4 – Description of how the Language Assistance Plan is Monitored and Updated

Jay-Randolph Developmental Services Inc reviews its plan on an annual basis or more frequently as needed. In particular, **Jay-Randolph Developmental Services Inc** will evaluate the information collected on encounters with LEP persons as well as public outreach efforts to determine if adjustments should be made to the delivering of programs and services to ensure meaningful access to minority and LEP persons.

Item # 5 - Description of how Employees are Trained to Provide Language Assistance to LEP Persons

Jay-Randolph Developmental Services Inc employees are educated on the principles of Title VI and **Jay-Randolph Developmental Services Inc** Language Assistance Plan. New employees will be provided guidance on the needs of clients served and how best to meet their needs.

Minority Representation Information
Jay-Randolph Developmental Services Inc

A. Minority Representation Table

The table below depicts Jay-Randolph Developmental Services Inc Board of Directors and our Transportation Advisory Committee.

Body	Caucasian	Hispanic	African American	Asian American	Native American
Population	97%	2%	0%	0%	1%
Board of Directors	100%	0%	0%	0%	0%
Transportation Advisory Committee	100%	0%	0%	0%	0%

B. Efforts to Encourage Minority Participation

Jay-Randolph Developmental Services Inc understands diverse representation on boards results in sound policy reflective of its entire population. As such, **Jay-Randolph Developmental Services Inc** encourages participation of all its citizens. As vacancies on our board become available, **Jay-Randolph Developmental Services Inc** will make efforts to encourage and promote diversity. To encourage participation on its board, **Jay-Randolph Developmental Services Inc** will continue to reach out to community, ethnic and faith-based organizations to connect with all populations. In addition, **Jay-Randolph Developmental Services Inc** will make participating realistic and reasonable by scheduling meetings at times best suited to its members.