

New Hope Services, Inc.

Title VI Plan

July 2021

This Title VI Plan meets the FTA requirements for non-fixed-route transit providers with no subrecipients and for fixed-route transit providers with fewer than 50 vehicles or serving a population less than 200,000.

New Hope Services, Inc.
725 Wall Street
Jeffersonville, IN 47130
(812) 288 – 8248
www.newhopeservices.org

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Title VI Plan

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A. Title VI Assurances

New Hope Services, Inc. agrees to comply with all provisions prohibiting discrimination on the basis of race, color, or national origin of Title VI of the Civil Rights Act of 1964, as amended, 42 U.S.C. 200d *et seq.*, and with U.S. DOT regulations, "Nondiscrimination in Federally-Assisted Programs of the Department of Transportation – Effectuation of Title VI of the Civil Rights Act," 49 CFR part 21.

New Hope Services, Inc. assures that no person shall, as provided by Federal and State civil rights laws, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity.

New Hope Services, Inc. further ensures every effort will be made to ensure non-discrimination in all programs and activities, whether those programs and activities are federally funded or not, by promoting actions that:

- A. Ensure that the level and quality of transportation service is provided without regard to race, color, or national origin.
- B. Identify and address, as appropriate, disproportionately high and adverse effects of programs and activities on minority populations and low-income populations.
- C. Promote the full and fair participation of affected Title VI populations in transportation decision making.
- D. Prevent the denial, reduction, or delay in benefits related to programs and activities that benefit minority populations or low-income populations.
- E. Ensure where possible meaningful access to programs and activities by persons with Limited English Proficiency (LEP).

NAME, TITLE: _____

SIGNATURE: _____ Date: _____

B. Agency Information

New Hope Services has a rich history of meeting human services needs throughout Southern Indiana for over 60 years. One of the largest nonprofit organizations in the Louisville region, it has been publicly recognized as a model in the delivery of developmental services.

Services are focused in three primary program areas: Adult Services, Family Services, and Housing & Community Development. Clients include families, seniors, and individuals with developmental disabilities. The organization now serves individuals and families in 20 counties throughout Southern Indiana and Kentucky.

New Hope Services is governed by a Board of Directors with three-year renewable terms. The Board is composed of twelve members, one of which is Chief Executive Officer James A. Bosley.

C. Notice to the Public

The Notice to the Public on the following page is/will be published on New Hope Services' website. Additionally, the Notice to the Public is be posted in areas where the public and clients interact with New Hope Services, including reception areas, meeting rooms, areas where services are provided, etc.

Notice to the Public: New Hope Services, Inc. operates its programs and services without regard to race, color, or national origin, in accordance to Title VI of the Civil Rights Act of 1964. If you believe you have been discriminated against on the basis of race, color, or national origin by New Hope Services, Inc., you may file a Title VI complaint by completing, signing, and submitting the agency's Title VI Complaint Form. <u>How to file a Title VI complaint with New Hope Services, Inc.</u> A Complaint Form may be obtained from the New Hope Services, Inc. website: www.newhopeservices.org , or in person from the New Hope Services, Inc. office at: 725 Wall Street, Jeffersonville, Indiana 47130. In addition to the complaint process at New Hope Services, Inc. complaints may be filed directly with the Federal Transit Administration, Office of Civil Rights, Attention: Complaint Team, East Building, 5th Floor - TCR, 1200 New Jersey Avenue, SE, Washington, DC 20590; Phone 888-446-4511 Complaints must be filed within 180 days following the date of the alleged discriminatory occurrence and should contain as much detailed information about the alleged discrimination as possible. The form must be signed and dated, and include your contact information. If information is needed in another language, contact (812) 288-8248.	 New Hope Services, Inc. New Lives. New Futures. New Hope
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D. Procedure for Filing a Title VI Complaint

Filing a Title VI Complaint

The complaint procedures apply to the beneficiaries of New Hope Services, Inc.'s programs, activities, and services.

RIGHT TO FILE A COMPLAINT: Any person who believes they have been discriminated against on the basis of race, color, or national origin by New Hope Services, Inc. may file a Title VI complaint by completing and submitting the agency's **Title VI Complaint Form**. Title VI complaints must be received in writing within 180 days of the alleged discriminatory complaint.

HOW TO FILE A COMPLAINT: Information on how to file a Title VI complaint is posted on our agency's website, and in public areas of our agency.

You may download the New Hope Services, Inc. Title VI Complaint Form at www.newhopeservices.org, or request a copy by writing to:

New Hope Services, Inc.
725 Wall Street
Jeffersonville, Indiana 47130

Information on how to file a Title VI complaint may also be obtained by calling New Hope Services, Inc. at (812) 288-8248.

You may file a signed, dated complaint no more than 180 days from the date of the alleged incident. The complaint should include:

- Your name, address and telephone number.
- Specific, detailed information (how, why and when) about the alleged act of discrimination.
- Any other relevant information, including the names of any persons, if known, the agency should contact for clarity of the allegations.

Please submit your complaint form to the Title VI Investigator at:

New Hope Services, Inc.
Attn: Jennifer Colson, Director of Human Resources
725 Wall Street
Jeffersonville, IN 47130

COMPLAINT ACCEPTANCE: New Hope Services, Inc. will process complaints that are complete.

Once a completed Title VI Complaint Form is received, New Hope Services, Inc. will review it to determine if New Hope Services, Inc. has jurisdiction. The complainant will receive an acknowledgement letter informing them whether or not the complaint will be investigated by New Hope Services, Inc.

INVESTIGATIONS: New Hope Services, Inc. will generally complete an investigation within 90 days from receipt of a completed complaint form. If more information is needed to resolve the case, New Hope Services, Inc. may contact the complainant. Unless a longer period is specified by New Hope Services, Inc. the complainant will have ten (10) days from the date of the letter to send requested information to the New Hope Services, Inc. investigator assigned to the case.

If the requested information is not received within that timeframe, the case may be administratively closed. Also, a case may be administratively closed if the complainant no longer wishes to pursue the case, upon written notice, and if the New Hope Services, Inc. Executive Director approves.

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

- A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed.
- A Letter of Finding (LOF) summarizes the allegations and provides an explanation of the corrective action taken.

If the complainant disagrees with New Hope Services, Inc.'s determination, the complainant may request reconsideration by submitting the request in writing to the Title VI investigator, and a copy to the TARC Executive Director, 1000 W Broadway, Louisville, KY 40203, within seven (7) days after the date of the letter of closure or letter of finding, stating with specificity the basis for the reconsideration. New Hope Services, Inc. will notify the complainant of the decision either to accept or reject the request for reconsideration within ten (10) days. In cases where reconsideration is granted, New Hope Services, Inc. will issue a determination letter to the complainant upon completion of the reconsideration review.

A person may also file a complaint directly with the Federal Transit Administration, at the FTA Office of Civil Rights, Attention: Complaint Team, East Building, 5th Floor - TCR, 1200 New Jersey Avenue, SE, Washington, DC 20590.

If information is needed in another language, contact New Hope Services, Inc. at **(812) 288 - 8248** or at:

New Hope Services, Inc.
725 Wall Street
Jeffersonville, Indiana 47130

E. Monitoring Title VI Complaints, Investigations, Lawsuits and Agency Staff Title VI Training

1. Documenting Title VI Complaints, Investigations, and Lawsuits:

A Title VI Coordinator has been/will be appointed within New Hope Services, Inc. The Title VI Coordinator may be a person who performs other duties within the agency.

- **If a Title VI complaint is filed against an agency employee** (such as a receptionist, caregiver, driver, etc.), then the agency has jurisdiction, and New Hope Services, Inc.'s Title VI investigator will investigate the complaint.
- When the investigation is completed, New Hope Services, Inc. will send a summary of the investigation to the TARC Grants Department at rgreenleaf@ridetarc.org
- **If a Title VI complaint is filed against the agency as a whole**, then the agency does not have jurisdiction, and it will forward the complaint to the TARC Grants Department at rgreenleaf@ridetarc.org to be investigated.

All Title VI complaints have been/will be entered and tracked in New Hope Services, Inc.'s Title VI Complaint Log. The New Hope Services, Inc.'s Title VI Coordinator will maintain the log. The log will be made available to TARC on a semi-annual basis or upon request. Active investigations will be monitored for timely response on the part of all parties.

2. Documenting Agency Staff Title VI Training:

New Hope Services, Inc.'s staff are/will be given Title VI training, and will be able to answer affirmatively to all the following questions:

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

F. Public Participation Plan

New Hope Services, Inc. participates in TARC's Public Participation Plan, which includes:

Goal:

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

Objectives

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

Identification of Stakeholders:

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

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

- Private businesses and organizations
- Employers
- Partner agencies

Elements of the Public Participation Plan:

1. Public Notice

- a. Official notification of intent to provide opportunity for members of the general public to participate in public engagement plan development, including participation in open Board/council meetings, and advisory committees.

2. Public Participation Process/Outreach Efforts:

- a. Public meetings
- b. Rider outreach
- c. Public hearings
- d. Surveys
- e. Services for individuals with disabilities (notices of opportunities for public involvement include contact information for people needing these or other special accommodations.)
- f. Events such as public meetings and/or open houses are held at schools, churches, libraries and other non-profit locations easily accessible to public transit and compliant with the Americans with Disabilities Act.

3. Public Comment

- a. Formal public comment periods are used to solicit comments on major public involvement efforts around an agency service or system change.
 - b. Comments are accepted through various means:
 - i. Dedicated email address.
 - ii. Website.
 - iii. Regular mail.
- iv. Phone calls to Customer Service Center [phone]**

G. Language Assistance (LEP) Plan

New Hope Services, Inc. Limited English Proficiency Plan

This limited English Proficiency (LEP) Plan has been/is being prepared to address New Hope Services, Inc.'s responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited ability to speak, read, write, or understand English. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964 and the Federal Transit Administration Circular 4702.1B, dated October 1, 2012, which states that the level and quality of transportation service is provided without regard to race, color, or national origin.

Executive order 13166, titled "Improving Access to Services for Persons with Limited English Proficiency," indicates that differing treatment based upon a person's limited ability to speak, read, write or understand English is considered to be a type of National Origin discrimination. It directs each federal agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discriminations do not take place. This order applies to all state and local agencies which receive federal funds.

Service Area Description:

Indiana Counties:

Bartholomew, Clark, Clay, Fayette, Floyd, Franklin, Dearborn, Harrison, Jackson, Jefferson, Jennings, Madison, Ohio, Ripley, Rush, Scott, Switzerland, Union, Vermillion, and Washington.

Kentucky Counties:

Jefferson, Oldham, Trimble, Bullitt, Carroll, Shelby and Spencer.

New Hope Services, Inc. has developed this LEP Plan to help identify reasonable steps for providing language assistance to persons with limited English proficiency who wish to access services provided by New Hope Services, Inc. As defined in Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write, or understand English. This plan outlines how to identify a person who may need language assistance, and the ways in which assistance may be provided.

In order to prepare this plan, New Hope Services, Inc. undertook the **LEP Four Factor Analysis** as follows:

Four Factor Analysis

Factor 1 – The number and proportion of LEP persons in the New Hope Services, Inc. service area:

A significant majority of people in the New Hope Services, Inc. service area are proficient in the English language. Based on Census data, 1.2% of the population five years of age and older speak English “less than very well” – a definition of limited English proficiency

Factor 2 – Frequency of Contact with LEP Persons by New Hope Services, Inc. :

The New Hope Services, Inc. staff performs/will perform reviews of the frequency with which office staff, dispatchers and drivers have, contact with LEP persons.

Current Estimate: New Hope Services, Inc. has, on average, 1,200 requests per month for an interpreter. However, New Hope Services, Inc. takes diligent efforts to route calls and provide staffing needs in which clients are not required to ask for interpreters.

Factor 3 – The importance to LEP persons of services provided by New Hope Services, Inc. :

Outreach activities, summarized in New Hope Services Inc.’s Title VI Public Participation Plan, include events such as public meetings and/or open houses held at schools, churches, libraries and other non-profit locations, and include specific outreach to LEP persons to gain understanding of the needs of the LEP population, and the manner needs are addressed.

-New Hope Services, Inc. has done/will do the following to assess the importance of New Hope Services, Inc. services to LEP persons:

1. Outreach and networking with area groups and organizations that represent or serve LEP persons
2. Outreach and presence at cultural events that are attended by LEP persons
3. Public meetings and/or open houses with outreach to LEP persons at schools, churches, libraries and other non-profit locations.

Factor 4 – The resources available to New Hope Services, Inc. and overall cost to provide LEP assistance:

a. Monitoring and Updating the LEP Plan:

The LEP Plan is a component of New Hope Services, Inc.'s Title VI Plan requirement.

New Hope Services, Inc. will update the LEP plan as required. At minimum, the plan will be reviewed and updated when it is clear that higher concentrations of LEP individuals are present in the New Hope Services, Inc. service area.

Updates include the following:

1. Determine the current LEP population in the service area.
2. Determine how the needs of LEP persons have been addressed.
3. Determine whether the need for translation/interpretation services has changed.
4. Determine whether current language assistance services been effective and sufficient to meet the needs.
5. Determine what financial resources are available to New Hope Services, Inc. to fund language assistance services and whether they are sufficient.
6. Determine whether New Hope Services, Inc. has fully complied with the goals of its LEP Plan.
7. Determine whether complaints have been received concerning New Hope Services, Inc.'s failure to meet the needs of LEP individuals.

b. Services for Providing Language Assistance for Persons with Limited English Proficiency (LEP Persons) include:

1. No one is/will be denied service because of limited English proficiency.
2. Assistance and direction is/will be provided to LEP persons who request assistance.
3. Language line: interpretation via telephone interpretation/translation services is/will be provided as needed.
4. Oral interpretation/translation in person is/will be available.
5. Language identification cards ("I Speak Cards") are/will be provided to staff.
6. One-on-one assistance can/will be provided.
7. Website information is/will be posted.
8. LEP persons are/will be notified of the languages interpreted and translated.
9. Training is/will be provided to help staff better communicate with LEP persons.

Based on the Four Factor Analysis, it has been determined that no language group within the service area requires written translations of vital documents.

(Explanation of the Safe Harbor Provision: "The Safe Harbor Provision can be satisfied by providing written translations of vital written documents when an LEP language group:

is at least 1,000 persons in the total population qualified to be served (or likely to be affected or encountered) in the agency's total service area,

- OR -

is at least 5% of the total population qualified to be served (or likely to be affected or encountered) in the agency's total service area."

"Note: Even if it may not be required by the Safe Harbor Provision, if a language group such as Spanish has a large number of LEP persons (but fewer than 1000 persons or 5% of the total service area) then it is still desirable to have written translations of vital documents if financial resources allow."

"Note: The Safe Harbor Provision applies to the written translation of written documents only. There is always a general requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are feasible, including assistance filling out written forms and applications."

c. Staff LEP Training:

The following training is/will be provided to New Hope Services, Inc. staff:

1. Information on New Hope Services, Inc. Title VI Procedures and LEP responsibilities
2. Description of language assistance services offered to the public
3. Use of language identification cards ("I Speak cards")
4. Documentation of language assistance requests

H. Transit-related, Non-elected Planning Board, Advisory Council, or Committee

"If a grantee agency has a transit-related, non-elected planning board, advisory council or committee, the grantee must do two things.

One, provide FTA with a table depicting the racial breakdown of its committee membership.

And two, provide FTA with a description of the efforts made to encourage the participation of minorities on such committees."

New Hope Services, Inc. **does not** have a Transit-related, Non-elected Planning Board, Advisory Council, or Committee.

TITLE VI COMPLAINT FORM

"No person in the United States shall, on the basis 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."

If you feel that you have been discriminated against in the provision of transportation services, please provide the following information to assist us in processing your complaint. Should you require any assistance in completing this form or need information in alternate formats, please let us know.

Please mail or return this form to:

Jennifer Colson, Director of Human Resources
New Hope Services, Inc.
725 Wall Street
Jeffersonville, IN 47130
Jennifer_Colson@newhopeservices.org
(812) 288-8248
www.newhopeservices.org

PLEASE PRINT

1. Complainant's Name:		
a. Address:		
b. City:		State:
c. Telephone (include area code): Home () or Cell ()		Work () - () -
d. Email address: Do you prefer to be contacted by this e-mail address? () YES () NO		
2. Accessible Format of Form Needed? () YES specify: _____ () NO		
3. Are you filing this complaint on your own behalf? () YES If YES, please go to question 7. () NO If no, please go to question 4		
4. If you answered NO to question 3 above, please provide your name and address.		
a. Name of Person Filing Complaint:		
b. Address:		
c. City:		State:
d. Telephone (include area code): Home () or Cell ()		Work () - () -
e. Email address: Do you prefer to be contacted by this Email address? () YES () NO		
5. What is your relationship to the person for whom you are filing the complaint?		
6. Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party. () YES, I have permission. () NO, I do not have permission.		
7. I believe that the discrimination I experienced was based on (check all that apply): () Race () Color () National Origin (classes protected by Title VI) () Other (please specify)		

(Continued)

TITLE VI COMPLAINT FORM – PAGE 2

8. Date of Alleged Discrimination (Month, Day, Year):
9. Where did the Alleged Discrimination take place?
10. Explain as clearly as possible what happened and why you believe that you were discriminated against. Describe all of the persons that were involved. Include the name and contact information of the person(s) who discriminated against you (if known). <i>Use the back of this form or separate pages if additional space is required.</i>
11. Please list any and all witnesses' names and phone numbers/contact information. <i>Use the back of this form or separate pages if additional space is required.</i>
12. Please explain what remedy or action you are seeking for the alleged discrimination.
13. Have you filed a complaint with any other Federal, State, or Local agency, or with any Federal or State court? <input type="checkbox"/> YES If yes, check all that apply. <input type="checkbox"/> NO a. <input type="checkbox"/> Federal Agency (List agency's name) b. <input type="checkbox"/> Federal Court (Please provide location) c. <input type="checkbox"/> State Court d. <input type="checkbox"/> State Agency (Specify Agency) e. <input type="checkbox"/> County Court (Specify Court and County) f. <input type="checkbox"/> Local Agency (Specify Agency)
14. If YES to question 14 above, please provide information about a contact person at the agency/court where the complaint was filed. Name: _____ Title: _____ Agency: _____ Telephone: () - _____ Address: _____ City: _____ State: _____ Zip Code: _____

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

Signature and date are required:

Signature

Date

New Hope Services, Inc.

Staff LEP Survey Form

1. What is your job title? _____

2. Please indicate with an "x" in the table below how often at work you interact with a person who does not speak English very well ("LEP Person")

- Use the additional boxes to list other languages spoken by LEP persons
- If you are unable to identify the language spoken, use the "All Other Languages" box

Language spoken by the LEP person ↓	----- Frequency of Contact with an LEP Person -----				
	Most Days	At Least Once a Week	At Least Once a Month	At Least Once a Year	Never
Spanish					
All Other Languages:					

3. Please indicate with an "x" in the table below how you interacted with LEP person(s)

In person	Telephone	Email	Text message	Other

Title VI Self-Survey Form – Page 1

Date filed:

DATE

Survey Date:

Period Covered:

Name of Program/Grant:

A. Summary of Complaints:

B. Number of complaints for the period:

C. Number of complaints voluntarily resolved:

D. Number complaints currently unresolved:

E. Attach a summary of any type of complaint and provide:

- Name of complainant
- Race
- Allegation
- Findings
- Corrective Action
- Identify any policy/procedure changes made as a result of the complaint.
- Provide the date history (date complaint received through resolution)

(Continued)

Title VI Self-Survey Form – Page 2

Distribution of Title VI Information

1. Are new employees made aware of the Title VI responsibilities pertaining to their specific duties?

YES _____ NO _____

2. Do new employees receive this information via employee orientation?

YES _____ NO _____

3. Is Title VI information provided to all employees and program applicants?

YES _____ NO _____

4. Is Title VI information prominently displayed in the organization and on relevant program materials?

YES _____ NO _____

5. Identify any improvements you have implemented since the last self-survey to support Title VI communication to employees and program applicants.

6. Identify any improvements you plan to implement before the next self-survey to support Title VI communication to employees and program applicants.

7. Identify any problems encountered with Title VI compliance, and discuss possible remedies.

Signature: _____

Title: _____

Date: _____