

Notifying the Public of Rights Under Title VI

Sterling Presbyterian Manor Transportation Service

- The Sterling Presbyterian Manor operates its programs and services without regard to race, color, and 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 practice under Title VI may file a complaint with Sterling Presbyterian Manor.
- For more information on the Sterling Presbyterian Manor's civil rights program, and the procedures to file a complaint, contact 620-278-3651, email mrajewski@pmma.org; or visit our administrative office at 204 W. Washington Street, Sterling, Kansas, 67579.
For more information, visit www.sterlingpresbyterinmanor.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 620-278-3651

This notice is posted in the front lobby of Sterling Presbyterian manor and on our website at <http://www.sterlingpresbyterianmanor.org>

Sterling Presbyterian Manor Transit Public Participation Plan Outline

1. Brief description of provider's activities and services

Sterling Presbyterian Manor provides transportation service to its residents and citizens of the Sterling Kansas area, through the Sterling Presbyterian Manor Transportation Service. The service is financed through a combination of funds provided by the Kansas Department of Transportation U.S.C.49-5310 grant monies, funds from Presbyterian Manors of Mid America, and donations received for this purpose. Sterling Presbyterian Manor provides transportation for the residents of its nursing home, retirement center and the surrounding community when possible. We have one wheelchair ramp accessible minivan. It makes daily trips to Hutchinson, Lyons, Great Bend, Wichita and elsewhere. Its primary use is for medical appointments. All appointments are on demand scheduled. Are services are provided primarily to the disabled, elderly, and low income citizens.

2. Brief description of activities that would warrant public participation (i.e. fare changes, changes to service hours, route adjustments, service area changes).

Sterling Presbyterian Manor would make every reasonable effort to engage the public when making changes in fares, hours of service, route revision and service areas.

3. Brief description of the proactive public participation strategies would be used.

Public notification and engagement opportunities would include but not be limited to:

- Social media notices – currently Sterling Presbyterian manor has a Facebook and a web page. We also participate in the Rice County Council on Aging community resources meetings.
- Posters in local low-income housing units and grocery stores
- Public hearings/ meetings held at convenient time and in accessible locations
- Notices and news articles in the Sterling
- Rider surveys administered to a convenience sample

4. Brief description of outreach methods to engage minority and Limited English Proficiency (LEP) individuals (i.e. translation of public meeting materials, providing translation services if requested, targeted media messages in low income neighborhoods of service area, Work with existing neighborhood and advocacy organizations).

Sterling Presbyterian Manor would provide translation services (if requested) and sign language interpretation at public meetings. Notices would be sent to low income housing units and low income neighborhood churches, etc.

5. Brief description of the desired outcomes of the agency's public participation efforts.
- The Sterling Presbyterian Manor transportation service desires to have actively engaged transit riders, stakeholders and members of the general public in the decision making process.
 - The Sterling Presbyterian Manor transportation service strives to have given adequate public notice of public participation activities and allowed proper time for public review and comment at key decision points.
 - The Sterling Presbyterian Manor transportation service desires to provide timely information about transportation issues and processes to transit riders, stakeholders and members of the general public
 - The Sterling Presbyterian Manor transportation service will provide responses to all public input as appropriate.
 - The Sterling Presbyterian Manor transportation service will have facilitated effective communication among a diverse group of stakeholders.
 - The Sterling Presbyterian Manor transportation service will have established a timetable for review of the Public Participation Process to ensure it provides full and open access to all.
 - The Sterling Presbyterian Manor transportation service to have the community at large view public transportation as community asset enriching the lives of all.
6. Brief summary of recent outreach efforts over the past three years.
- Participated in Community Events by displaying a stationary bus for the public to view and board
 - When feasible, electronically send and/or mail meeting announcements (invitations) to groups likely to be interested in the agency's activities.
 - Local newspaper articles, advertisements, and public notices
 - Publications on Facebook page and in community newsletter shared with a database by mail and email.
 - Avoidance of technical jargon in presentations and information displayed

Additional Public Participation Resources

- Transit Cooperative Research Program, Public Participation Strategies for Transit
http://onlinepubs.trb.org/onlinepubs/tcrp/tcrp_syn_89.pdf
- Public Participation from National Resource Center for Human Service Human Service Transportation
<http://web1.ctaa.org/webmodules/webarticles/anmviewer.asp?a=2336>
- Public Involvement Process from FTA
http://www.fta.dot.gov/12347_226.html

A copy of FTA's Circular 4702.1B may be found at:

http://www.fta.dot.gov/documents/FTA_Title_VI_FINAL.pdf

Limited English Proficiency (LEP) Plan

Four Factor Analysis

- (1) **Identify number of or proportion of LEP individuals that can utilize the service provided by the Sterling Presbyterian Manor transportation service:**

According to the most current published (2014) American Community Survey data, the populations in the city of Sterling have no language groups that represent more than 5% of the population and more than 50 persons who speak English less than very well. Sterling Presbyterian Manor currently has no residents with limited English proficiency as a language.

- (2) **Identify the frequency in which LEP individuals come in contact with the service:**

No language group in the city of Sterling met the threshold for a LEP group.

- (3) **Identify the importance of the service to the LEP community:**

The Sterling Presbyterian Manor transportation service will provide, when we do have LEP's with transportation to medical facilities, educational opportunities and more.

- (4) **Identify the resources available and the respective costs of these resources:**

Although not formally trained as translators, several bilingual individuals within the community are a readily available resource whom non-English speaking individuals have utilized at no cost.

Limited English Proficiency Plan

Utilizing the information gathered from the Four Factor Analysis, the following plan is developed in order to provide the necessary assistance to LEP persons.

Identified LEP individuals

According to the 2014 American Community Survey data, the population of Sterling has no language groups that represent more than 5% of the population and more than 50 persons who speak English less than very well.

Language Assistance Measures

Although no language group in the city of Sterling met the threshold for designation as a LEP group, when needed, the Sterling Presbyterian Manor transportation service would utilize online translation tools, non- formally trained bilingual community members as volunteer translators, local school district and Sterling College document translation services, Braille services available through the Prairie Independent Living Center and sign language interpretation services when critically necessary

Training Staff

The staff will be informed of this at department meetings. The Sterling Presbyterian Manor Executive Director and Health Services Director, and transportation assistant have an awareness of translation tools and resources as a result of self-teaching.

Providing Notice

The Sterling Presbyterian Manor transportation service LEP plan will be provided to any person or agency upon request. The contact person in regard to the Sterling Presbyterian Manor transportation service LEP plan is Michael Rajewski and he can be reached via phone at 620-278-3651 or email at mrajewski@pmma.org.

Monitoring and Updating LEP Plan

The Sterling Presbyterian Manor transportation service will update the LEP plan according to the Title VI update schedule which is every three years. The plan will also be updated anytime changes in the demographics of the agencies service area are deemed significant in regards to LEP persons.

Title VI Complaint Procedure

Title VI Complaint Procedures

The following pertains only to Title VI complaints regarding the services of the Reno County Public Transportation Department

Title VI, 42 U.S.C. §2000d et seq., was enacted as part of the Civil Rights Act of 1964. At the heart of the regulation is the statement that:

No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

The Sterling Presbyterian Manor transportation service 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 Chapter III of the Federal Transit Administration Circular 4702.1B, dated October 1, 2012. If you believe that the Sterling Presbyterian Manor transportation services federally funded programs have discriminated your civil rights on the basis of race, color, or national origin you may file a written complaint by following the procedure outlined below:

1. Submission of Complaint.

Any person who feels that he or she, individually or as a member of any class of persons, on the basis of race, color, or national origin has been excluded from or denied the benefits of, or subjected to discrimination caused by the Sterling Presbyterian Manor transportation service, may file a written complaint with Sterling Presbyterian Manor's executive director. A sample complaint form is available for download at www.sterlingpresbyterianmanor.org and is available in hard copy at the offices of Sterling Presbyterian Manor. Upon request, Sterling Presbyterian Manor will mail the complaint form. **Such complaints must be filed within 180 calendar days after the date the discrimination occurred.**

Assistance in the preparation of any complaints will be provided to a person or persons upon request and as appropriate. If information is needed in another language, then contact Michael Rajewski, (620-278-3651)

Complaints should be mailed to or submitted by hand to:

204 West Washington
Sterling, KS 67579
ATTN: Executive Director

2. Referral to Review Officer

Upon receipt of the complaint, the Executive Director shall appoint one or more staff review officers, as appropriate, to evaluate and investigate the complaint. If necessary, the Complainant shall meet with the staff review officer(s) to further explain his or her complaint. The staff review officer(s) shall complete their review no later than 45 calendar days after the date the agency received the complaint. If more time is required, the Executive Director shall notify the Complainant of the estimated timeframe for completing the review. Upon completion of the review, the staff review officer(s) shall make a recommendation regarding the merit of the complaint and whether remedial actions are available to provide redress. Additionally, the staff review officer(s) may recommend improvements to The Sterling

Presbyterian Manor transportation service processes relative to Title VI, as appropriate. The staff review officer(s) shall forward their recommendations to the Executive Director for concurrence. If the Executive Director concurs, he or she shall issue the Sterling Presbyterian Manor transportation service's written response to the Complainant. This final report should include a summary of the investigation, all findings with recommendations, corrective measures where appropriate.

Note: Upon receipt of a complaint, the Sterling Presbyterian Manor transportation service Reno County Public Transportation Department shall forward a copy of this complaint and the resulting written response to the appropriate KDOT and FTA-Region 7 contacts.

3. Request for Reconsideration

If the Complainant disagrees with the Executive Director's response, he or she may request reconsideration by submitting the request, in writing, to Sterling Presbyterian Manor within 10 calendar days after receipt of the Executive Director response. The request for reconsideration shall be sufficiently detailed to contain any items the Complainant feels were not fully understood. The Executive Director will notify the Complainant of his or her decision in writing either to accept or reject the request for reconsideration within 10 calendar days. In cases where the Executive Director agrees to reconsider, the matter shall be returned to the staff review officer(s) to re-evaluate in accordance with Paragraph 2 above.

4. Appeal

If the request for reconsideration is denied, the Complainant may appeal the Executive Director's response by submitting a written appeal to Presbyterian Manors of Mid America Regional Director of Operations Officer no later than 10 calendar days after receipt of the Executive Director's written decision rejecting reconsideration. The Regional Director of Operations Officer will then make a determination to either request re-evaluation by the staff review officer(s) or forward the complaint to KDOT for further investigation.

5. Submission of Complaint to the State of Kansas Department of Transportation.

If the Complainant is dissatisfied with Sterling Presbyterian resolution of the complaint, he or she may also submit a written complaint within 180 days after the alleged date of discrimination to the State of Kansas Department of Transportation for further investigation.

KDOT Office of Contract Compliance
Eisenhower State Office Building
700 Southwest Harrison
3rd Floor West
Topeka, KS 66603

The Sterling Presbyterian Manor transportation service Title VI Complaint Form

The purpose of this form is to assist you in filing a complaint with the Reno County Public Transportation Department. You are not required to use this form; a letter containing the same information will be sufficient.

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:				

Section IV		
Have you previously filed a Title VI complaint with this agency?	Yes	No

Section V	
Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court? <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:

Signature _____ Date _____

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

Sterling Presbyterian Manor Executive Director
 204 W. Washington
 Sterling, Kansas 67579

List of Title VI Investigations, Lawsuits and Complaints

	Date Submitted/Filed (Month, Day Year)	Summary of allegation (include basis of complaint: race, color or national origin)	Status	Resolution/Action Taken
Investigations				
1				
2				
Lawsuits				
1				
2				
Complaints				
1				
2				

Table Depicting Membership of Reno County Public Transportation Department Committees, Councils, Broken Down by Race

Body	Caucasian	Latino	African American	Asian American	Native American	Other
City of Sterling Population within service area	96.1%	.01%	0%	0%	0%	3.89%
Agency Board of Directors	60%	23%	10%	7%	0%	0%