

DOLORES COUNTY SENIOR SERVICES

Title VI Plan

Adopted November 16, 2020

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BACKGROUND

Dolores County Senior Services is located in Dove Creek, Colorado and serves the counties of Dolores County, the west end of San Miguel County, and the west end of Montezuma County. A total of 16 employees are employed at this multi-purpose organization that served approximately 405 clients in 2019. DCSS provides demand response transit service to seniors and the general public in Dolores County and surrounding areas. DCSS responds not only to the needs of the elderly and disabled, but to the general public including low income and other transit dependent persons in the community. Service is provided five days a week, Monday through Friday, 8:00 am to 5:00 pm and for scheduled events.

NOTICE TO THE PUBLIC

Dolores County Senior Services 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 Dolores County Senior Services. For more information on Dolores County Senior Services civil rights program and procedures to file a complaint contact 970-677-2787; email dcsenior@fone.net; or visit our director's office at 8540 RD 7.2, Dove Creek, Colorado 81324. A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with 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 970-677-2787.

The numbers and percentages of LEP persons in our service area are very low. At this time, no additional services are necessary. The County is committed to continue to monitor LEP needs over time and budget accordingly to address those needs if and when they arise. Dolores County Senior Services Title VI Complaint Procedure will be translated into other languages, as needed, including contact information for the translation service.

A copy of this notice can be found on Dolores County Senior Services' website at www.dolorescountyseniorservices.org, posted in the foyer of our facility and in all vehicles used in transporting public transportation clients.

COMPLAINT PROCEDURES AND FORM

A formal complaint must be filed within one-hundred eighty (180) calendar days of the alleged occurrence. Complaints shall be in writing and signed by the individual or his/her representative, and will include the Complainant's name, address and telephone number; name of the alleged discriminating person(s), basis of complaint (race, color, national origin), and the date of the alleged act or acts. A statement detailing the facts and circumstances of the alleged

discrimination must accompany all complaints. Please submit Title VI Complaints in writing to Dolores County Senior Services at the address listed below.

Director
Dolores County Senior Services
PO Box 678
Dove Creek, CO 81324
970-677-2787

In the case where a Complainant is unable or incapable of providing a written statement, a verbal complaint of discrimination may be made to Dolores County Senior Services Director. Under these circumstances, the Complainant will be interviewed, and the Director will assist the Complainant in converting the verbal allegations to writing.

When a complaint is received, the Director will provide written acknowledgment to the Complainant within ten (10) calendar days by registered mail.

If a complaint is deemed incomplete, additional information will be requested, and the Complainant will be provided sixty (60) calendar days to submit the required information. Failure to do so may be considered good cause for a determination of no investigative merit.

Within fifteen (15) calendar days from receipt of a complete complaint, Dolores County Senior Services will determine its jurisdiction in pursuing the matter and whether the complaint has sufficient merit to warrant investigation. Within five (5) calendar days of this decision, the Director or his/her authorized designee will notify the Complainant and Respondent, by registered mail, informing them of the disposition.

- a. If the decision is not to investigate the complaint, the notification shall specifically state the reason for the decision.
- b. If the complaint is to be investigated, the notification shall state the grounds of Dolores County Senior Service's jurisdiction, while informing the parties that their full cooperation will be required in gathering additional information and assisting in the investigation.

When Dolores County Senior Services does not have sufficient jurisdiction, the Director or his/her authorized designee will refer the complaint to the appropriate State or Federal agency holding such jurisdiction.

If the complaint has investigative merit, the Director or his/her authorized designee will assign an investigator. A complete investigation will be conducted, and an investigative report will be

submitted to the Director within sixty (60) calendar days from receipt of the complaint. The report will include a narrative description of the incident, summaries of all persons interviewed, and a finding with recommendations and conciliatory measures where appropriate. If the investigation is delayed for any reason, the investigator will notify the appropriate authorities, and an extension will be requested.

The Director or his/her authorized designee will issue letters of finding to the Complainant and Respondent within ninety (90) calendar days from receipt of the complaint.

If the Complainant is dissatisfied with Dolores County Senior Services resolution of the complaint, he/she has the right to file a complaint with the Federal Transit Administration, at FTA Office of Civil Rights, 1200 New Jersey Ave SE, Washington, DC 20590.

The numbers and percentages of LEP persons in our service area are very low. At this time, no additional services are necessary. The County is committed to continue to monitor LEP needs over time and budget accordingly to address those needs if and when they arise. Dolores County Senior Services Title VI Complaint Procedure will be translated into other languages, as needed, including contact information for the translation service.

TITLE VI COMPLAINTS, INVESTIGATIONS AND LAWSUITS

Dolores County Senior Services has had no complaints, investigations, or lawsuits.

PUBLIC PARTICIPATION PLAN

To have a proactive public involvement process, the DCSS will provide a public comment period of 30 days on the proposed public participation procedure to be used in transportation planning process. The procedures will inform the public about how, when, and where they may participate. Public notification will be as provided in Section IV.

Official notification of meetings, hearings or other significant events will be provided in the following manner:

Publication will be at least thirty (30) days prior for public hearings and an adequate period for public meetings. An explanation of the content, along with the date, time and the place of the meeting will be published at least once in the local newspaper.

DCSS will also utilize the following techniques to disseminate the information to a larger audience:

Information regarding meetings and events will be placed on the DCSS web site:

www.dolorescountyseniorservices.org Public Service Announcements and interviews on local television, DCTV to explain subject matter and promote participation. Use of advisory committees for community involvement. Formal presentations to various service clubs, civic and

professional groups. Information to be included in monthly newsletter that is sent out to DCSS clients.

DCSS will provide the public with reasonable and timely access to technical and policy information relating to the data or content used in the development of transportation plans, programs, and projects. Standard documents will be available on the Dolores County Senior Services' web site www.dolorescountyseniorservices.org and at the DCSS office at 8540 RD 7.2, Dove Creek, CO during normal working hours.

In order to ensure that the public is able to visualize the potential impact of any particular transportation or planning project, DCSS will provide visual aids at public meetings and/or at the DCSS office. The visual aids may include but are not limited to the following types:

- A. Power Point Presentations
- B. Project Renderings
- C. Regional and Project Level Maps
- D. Satellite Photos
- E. Project Site Photos
- F. Charts and Graphs
- G. "Before and After" Depictions

DCSS will take a proactive approach to providing the opportunity for the public to be involved early and with a continuing involvement in all phases of the planning process. Extensive public notice will be undertaken of public information meetings and hearings.

Responses to questions and comments from the public concerning the public participation process, draft transportation plans, programs, or public agency consultation process will be made directly to the individual by letter or telephone call or by way of a periodic newsletter. A summary analysis and report on disposition of comments will be made a part of the final plan. Rationale for policy decisions will be available to the public in writing if requested.

LANGUAGE ASSISTANCE PLAN

It is the policy of Dolores County Senior Services to ensure that our programs and activities, normally provided in English, are accessible to LEP persons and thus do not discriminate on the basis of nation origin in violation of Title VI of the Civil Rights Act of 1964. DCSS will, to the maximum extent feasible in its official deliberations and communications, community outreach and related notifications, provide appropriate alternative non-English formats to ensure LEP persons have access to information and services.

Current population numbers show the population of the entire county as being 1,841 and of that population, only 36 people, or 1%, is of another national origin, as well as only 8 people that speak English less than "very well." Due to this very small percentage, we have not made contact with LEP persons through any channels.

We provide a Demand Response public transportation program to Dolores County and surrounding area. Current rider data, as shown through surveys, shows no contact with LEP persons has occurred in our program.

The importance of LEP contact is high for public transit and specialized transportation services. Therefore, even though the potential demand is quite low, we are aware that if the need arises, we will develop strategies to address this need, both now and for the future. At the current time there has been no need for LEP services as we have not had any contacts with LEP individuals. The numbers and percentages of LEP persons in our service area are very low. The County is committed to continue to monitor LEP needs over time and budget accordingly to address those needs if and when they arise.

As the need arises, we will consider the following to respond to LEP needs:

- Obtain copies of CDOT's "Basic Spanish for Transit Employees", or information of any other identified language need and distribute to drivers and customer service staff as appropriate.
- Identify other community resources such as agencies serving LEP persons which may have resources to share.
- Contact Montezuma County for community resources in that county.
- Develop Spanish or other identified language versions of marketing materials, customer complaint forms, public notices, and related information, as appropriate through CDOT that we could call for translation services for both in person and brochure, document and web site translations.
- Use web-based Dictionary Boss for phrase translation into or from multiple languages.
- Use Language Line Services at www.language.com.

Similarly, as the need arises, we will consider the following for staff training topics:

- Identify all staff that are likely to come into contact with LEP persons.
- Design and implement LEP training necessary to address the need that would include: A summary of DCSS's responsibilities under the DOT LEP guidance and the agencies language assistance plan; a summary of the number and proportion of LEP persons in the service area, the frequency of contact between the LEP population and DCSS's programs; a description of the type of language assistance that we would be willing to provide as needed.

Dolores County Senior Services will consider the following steps in monitoring and updating our plan, as the need arises:

- We will establish a process to obtain feedback on our language assistance measures
- We will obtain feedback from community members and from staff
- Conduct internal monitoring to determine whether language assistance measures and staff training programs are working.
- Review our LEP Plan with staff and make adjustments as needed.

- Pay particular attention to demographic changes in our area and to any LEP related complaints we receive.

DCSS will provide notice to LEP persons, as the need arises, in the following outreach efforts:

- Provide typical public service announcements and community outreach through signs and handouts, Senior Service’s website, press releases, and newsletter.
- Identify agencies in our area that may serve LEP populations and provide information on our services to them, as appropriate.
- Have copies of our plan available to give to agencies serving LEP populations in our area and/or for individual requests.
- Provide opportunities for LEP participation at public meetings, through advertising and conduct meetings, as appropriate, through the Board of County Commissioners.

PLANNING AND ADVISORY BOARDS

The Dolores County Board of County Commissioners will oversee DCSS and staff in the preparation and review of public participation plans, transportation plans, programs, and other related matters. They will appoint a Senior Advisory Board as a specific citizen advisory committee whose members will be selected for their expertise, interest, or as an affected stakeholder. Examples are representatives of interest groups, transit users, minorities, disabled, or a representative of geographic area.

The Transit Advisory Committee (TAC) is a committee that is composed of persons with technical, planning, and or managerial experience and represents diverse community interests.

Membership of Appointed Senior Advisory Board/Transit Advisory Board

Senior Advisory Board/Transit Advisory Committee

	Gender		Race/Ethnicity				
	Male	Female	White	African American	Native American	Asian American	Hispanic
No.	1	11	12	0	0	0	0
Percent of Total	1%	99%	100 %	0%	0 %	0 %	0 %

(U.S. Census American Community Survey 2010-2014 estimates, population 5 years old and older, speaking another language in the home, who speak English "Well" "Not well" or "Not at All to be .1% which is a very low number of persons in the permanent population of Dolores County.)

Dolores County has a very small minority population, however, we encourage anyone, regardless of race, color or national origin to be a part of the Senior Advisory Board and the Transit Advisory Committee. DCSS campaigns for board and committee members when there is a place available through newsletter publications and through announcements at the meal site. These are voluntary positions and vacancies are filled with anyone who shows interest and who the Board of County Commissioners sees fit.

FACILITY LOCATION EQUITY ANALYSIS

In 2015, Dolores County began looking for property to construct a new Senior Center that would also house a dispatch center and vehicle shelter for Dolores County Senior Services' Senior and Public Transportation. Over time, the services offered to the senior population of Dolores County had outgrown the old facility, which caused a demand for a new building. This new building would help achieve equity for the local population of Dolores County to ensure everyone has a fair and just opportunity to live the healthiest life possible, no matter who they are, where they live, or how much money they make. Dolores County is committed in ensuring that no person is excluded from participation in, or denied benefits of, its transit services on the basis of race, color, or national origin, as protected by Title VI.

While location, size, price, and other criteria were used to select candidate properties, Dolores County analyzed demographics to ensure the site selection would have no disparate impact due to race, color, or national origin. According to ACS Demographic and Housing Estimates, the total population of Dolores County is 1,841, with only 3.3% of that population being minority. Dolores County is a very rural "Frontier" county with a very small population per square mile. There was no potential displacement of residents at any of the three sites considered in this site selection.

Dolores County is required to conduct a Title VI equity analysis to demonstrate that the facility is selected without regard to race, color, or national origin. Outreach to persons potentially impacted was done by holding Board of County Commissioner meetings that allow for public comment and by conducting surveys to collect public input. Dolores County studied potential locations and reviewed available properties that would have adequate space for the facility. Three sites were considered. One site was not considered because the landowners would not sell the property. One building was not considered because the land would not be sold with the building. The third site was chosen because it was owned by Dolores County and had adequate space, utility availability, and ease of access. No neighborhood in the city of Dove Creek was disqualified from the selection process. Race, color, and national origin of residents were not considered during the identification or evaluation of potential sites.

Dolores County reviewed benefits and burdens of each site to determine any impacts that might adversely affect the community. There was an Environmental Site Assessment done in March 2015 with no contamination issues found. The site selected is a parcel outside the town limits of Dove Creek and bordered by agricultural land, athletic fields, and the Public Service Center. The county is committed to providing a facility that will ensure the continuation of services that are provided to the local population of Dolores County.

Appendices

Appendix A: FTA Title VI Notice

Appendix B: FTA Title VI Complaint Procedure

Appendix C: FTA Title VI Complaint Form

Appendix D: FTA Title VI Investigations/Complaints Chart

NOTIFYING THE PUBLIC OF RIGHTS UNDER TITLE VI

**DOLORES COUNTY SENIOR SERVICES
PUBLIC TRANSPORTATION**

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- For more information on Dolores County Senior Services' civil rights program, and the procedures to file a complaint, contact 970-677-2787; email dcsenior@fone.net; or visit our director's office at 8540 RD 7.2, Dove Creek, Colorado 81324
- A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with 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 970-677-2787

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by Dolores County Senior Services (hereinafter referred to as “the Authority”) may file a Title VI complaint by completing and submitting the agency’s Title VI Complaint Form. Dolores County Senior Services investigates complaints received no more than 180 days after the alleged incident. The Authority will process complaints that are complete.

Once the complaint is received, the Authority 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.

The Authority has 10 days to investigate the complaint. If more information is needed to resolve the case, the Authority may contact the complainant. The complainant has 60 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 60 business days, the Authority 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 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. An 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 60 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.

Dolores County FTA Title VI Complaint Form

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):				
<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin				
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 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:

Julie Bingham, Director

PO Box 678


Dove Creek, CO 81324

Type	Date (day(s), month(s), year(s))	Summary (basis – race, color, or national origin)	Status	Action(s) taken
Complaints and Investigations against the subrecipient or its employees				
Lawsuits				


BOARD OF COUNTY COMMISSIONER APPROVAL



JULIE KIBEE



FLOYD COOK



STEVE GARCHAR



Julie Bingham, Executive Director