

**Coles County Council on Aging
Title VI Non-Discrimination Policy**

To be proposed to CCCoA Board on January 28, 2021

To be effective February 1, 2021

Coles County Council on Aging Title VI Policy

Policy Statement

Coles County Council on Aging (CCCoA), is committed to complying with the requirements of Title VI of the Civil Rights Act of 1964 in all of its programs, services, benefits and activities.

Public Information and Marketing

CCCOA will communicate to the community by providing information, brochures, and in presentations that explain how our services meet Title VI requirements. Title VI information will be made available at all public hearings and listening sessions. Including the accessibility of services and how a person can apply for those services. Policy and related forms are posted and available at CCCoA offices as well as the LifeSpan Center website (program specific websites as appropriate) to assure all persons have meaningful access to services and activities provided by CCCoA and its programs.

Accessible Formats

All information about the process, will be made available in accessible formats to the greatest extent possible. CCCoA makes available to individuals with disabilities information concerning services upon request. This information is made available through accessible formats and technology to enable users to obtain information and schedule service. The information can be found in large print, audio braille, English and Spanish (to the greatest extent possible). Brochures are available, at our facilities. All information is also available on program specific websites. Language assistance to persons with limited English proficiency (LEP) is provided via an Interagency Working Agreement with Eastern Illinois University's Foreign Language Department.

Title VI Complaint Process

Complaints regarding Title VI policy (discrimination) can be made by using the Title VI Complaint Form, this form can be obtained by contacting us by phone, or by using our online Title VI Complaint Form on our websites (lifespancecenter.org and dialaridettransit.org). Complaints should be filed within 180 Days of the alleged act of discrimination.

Please send the completed complaint form via US Mail, or email using the contact information below. You may attach any written materials or other information that you think is relevant to your complaint to this form

Email: contactus@lifespancecenter.org

Mail: CCCoA, Executive Director/Title VI Compliance
 11021 East Co. Rd 800 North
 Charleston, IL 61920
 Phone: 217-639-5150

CCCoA provides and maintains adequate records of complaints, reviews completed forms, notification provided, and any appeals requested and prepared to demonstrate that regulatory requirements were met in the handling of each complaint. Complaint forms are dated upon receipt. Decisions made throughout the review process (the completeness of the complaint, the need for more information, reasons for determinations, requests for appeals, etc.) are recorded.

Notice of Initial Determination

Applicants must be notified in writing of the initial determination of the complaint. If the determination is that the complaint is invalid, written notification must state this as a finding.

If the discrimination is determined to be legitimate. Disciplinary action against the staff member the complaint is lodged against will be implemented.

Administrative Appeal Process

An administrative appeal process is available to any individual who disagrees with the determination. Because the provision of Title VI is a civil right, CCCoA views a violation as a serious matter.

The appeal process is available to individuals who disagree with the initial determination resulting from a Title VI complaint.

- Individuals are permitted to request an appeal within 60 days of the initial determination decision of complaint, hearings will be held within 10 business days of filing unless more time is requested by individual requesting the hearing;
- Individuals have an opportunity to be heard in person and to present additional information and arguments regarding their complaint;
- There will be a "separation of function" between those involved in the initial determination and those selected to hear appeals;
- Individuals are notified of appeal decisions in writing, or in accessible format if requested, and the notification will state the appeal determination decision;
- If the discrimination is determined to be legitimate. Disciplinary action against the staff member the complaint is lodged against will be implemented.

The Appeal Hearing

- (1) An introduction of panel members
- (2) In an appeal process, the claimant will be provided documentation of the appeal process.
- (3) The claimant will be provided documentation of CCCoA Title VI (non discrimination) policy

- (4) A summary of the initial determination findings.
- (5) The claimant or representative will be provided the opportunity to provide additional information or dispute the initial determination findings.
- (6) The hearing officer or panel members will have an opportunity to ask the claimant or his/her representative questions; and
- (7) The restatement of policy concerning a decision on the appeal so that the claimant clearly understands what will happen following the hearing.

If there is a conflict of interest with a claimant or his/her representative or there is a personal relationship with a person on CCCoA panel and/or decision maker the conflicted party will be asked to recuse themselves from the process. In any instance that this is not possible or such request would be considered a hardship for the claimant, the conflict will be documented in the record and acknowledged by all parties.

Finally, because Title VI can become the subject of a civil rights complaint and ultimately be reviewed by the courts, it is important that there be documentation of the proceedings. It is not required or necessary to have hearings transcribed, but documentation will be complete enough to capture the essential issues raised and note that the established process was followed.

Observing Privacy Rights

The information that may be gathered as part of the Title VI complaint investigation process will not be shared with any other party. Access to information is limited to trained personnel and those with access to these files are required to observe HIPPA and to respect the privacy of applicants.

Training

CCCoA provides Culture Sensitivity Training and Title VI regulations to all newly hired employees and reviews on a biennial basis.

Transportation Program Specific Guidelines

Missed Trip Protocol

The following protocol is implemented equally to all individuals.

DAR understands that customers may sometimes miss scheduled rides or forget to cancel rides they no longer need. DAR also understands that customers may sometimes miss scheduled trips or be unable to cancel trips in a timely manner for reasons that are beyond their control. However, repeatedly missing scheduled trips or failing to cancel trips in a timely manner can lead to suspension of service. The following defines DAR's missed trip policy:

The regulations permit transit providers to suspend transit service to those persons who establish a "pattern or practice" of missing scheduled rides ("no-show"). Service can be suspended for a "reasonable period of time". Allowances must be made for missed trips that are beyond the

control of the individual. DAR makes every effort to work with passengers to understand their situation and avoid suspension of transportation services.

If a passenger shows a pattern or practice of missing trips, a suspension may occur.

A pattern or practice of missing trips is measured within a 90 day time frame. If a passenger misses 10% of their total number of trips within a 90 day period, a 30 day suspension from the transportation services will occur.

A missed trip is defined as a trip that is scheduled through dispatch and upon arrival of the bus; the passenger does not board within the 5 minute wait period.

Cancellation of a trip is not considered a missed trip if the phone call is received by dispatch a minimum of an hour prior to the passengers pick up time.

A notification letter will be sent to inform the passenger that a pattern or practice of missing trips has been established, and as a reminder that suspension will occur if the 10% threshold is reached.

A suspension letter will be sent to inform the passenger that a pattern or practice of missing trips has reached or exceeded the 10% limit of total number trips in a 90 day period, and include the time frame of the suspension.

All documentation will be kept in the passenger's personal file.

Trip Denials or Missed Trips

Denial Definition - a trip denial depends on the mode of service the passenger is requesting.

Same day services - is when a passenger cannot be scheduled within one hour prior to the requested time.

Twenty-four or more hours in advance notice type services – same as above, unless the customer is offered and accepts reasonable modification.

All denials are recorded by DAR.

DAR will ensure the availability of demand-response service and limit the total number of subscription trips provided to allow for access to transit service for those that need transport on a less frequent basis. DAR will have a goal of not exceeding 50% of the total trips for subscription trips; however, the 50% threshold can be exceeded as long as there is system capacity for demand-response trips.

Coles County Council on Aging (CCCoA) Title VI Complaint Form

CCCoA is committed to providing safe, reliable, courteous, accessible and user-friendly services to its customers. To ensure quality and fairness, CCCoA is committed to making reasonable policies, practices, and procedures to avoid discrimination and ensure programs and services are accessible to all individuals in compliance with Title VI of the Civil Rights Act of 1964. Complaints regarding Title VI policy (discrimination) can be made by using this form, contacting us by phone, or by using our online Title VI Complaint Form on our websites (lifespancecenter.org and dialaridetransit.org).

Preferred Contact Method (select one): Email Phone US Mail

First Name: _____ **Last Name:** _____

Address: _____

City: _____ **State:** _____ **Zip Code:** _____

Primary Telephone: _____

Email Address: _____

Briefly describe your Title VI (discrimination) complaint:

Please send this form via US Mail, or email using the contact information below. You may attach any written materials or other information that you think is relevant to your complaint to this form

CCCoA Executive Director Contact Information

US Mail
ATTN: Executive Director
Coles County Council on Aging
11021 ECR 800 North
Charleston, IL 61920

Phone
(217) 639-5150

Email
contactus@lifespancecenter.org