

**Community Connections, Inc.**

# **Title VI Program**



**Adopted October 2018**

**Updated August 2021**

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## TITLE VI PROGRAM QUESTIONNAIRE

**PART I.**  
**Title VI Requirements for All Grant Partners**

**BACKGROUND - INTRODUCTION**

Community Connections, Inc. is the statutorily-designated Community Centered Board serving individuals with intellectual and developmental disabilities in a five county area in southwest Colorado. The agency provides services and supports to qualifying individuals with intellectual and developmental disabilities based on eligibility criteria established by the Colorado State Legislature.

As part of our services, transportation is provided to qualifying individuals to allow them equal access to their community. When appropriate, education and training is provided so individuals may utilize public transportation safely on their own. Due to the wide spectrum of individuals we serve and the large area in which we provide services, public transportation is not always an option. Many individuals live outside of a bus route or do not have the safety skills to access transportation independently. Additionally, bus routes and hours of operation are limited in our five county region, further restricting their access to the community. Having access to safe, accessible transportation is vital to the quality of life of the individuals we serve.

**Title VI: Notice to the Public**  
**Notifying the Public of Rights under Title VI – Community Connections, Inc.**

Community Connections, Inc. (CCI) operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act of 1964. To request additional information on CCI's Title VI and other anti-discrimination obligations, or if information is needed in languages other than English, please contact Matt Payne at (970) 385-3447 and/or email [matt@cci-colorado.org](mailto:matt@cci-colorado.org).

Title VI Notice to the Public is posted on CCI website <https://www.communityconnectionsco.org/title-vi.html>; Durango, CO locations - front office/281 Sawyer Drive, and office bulletin board/831 E. 31<sup>st</sup> Street; Cortez, CO locations – front office/105 S. Harrison, and office bulletin board/325 S. Pine Street.

Any person who believes that he or she has been subjected to discrimination under Title VI may file a complaint with CCI. Complaint procedures/process are posted on the CCI website at <https://www.communityconnectionsco.org/title-vi.html>

Complaints must be filed within 180 days of the alleged discriminatory act. Please call the Office of Civil Rights or submit your complaint in writing to the Title VI Coordinator using the contact information below:

**Title VI Coordinator**  
Matt Payne  
Adult Services Program Director  
Title VI Coordinator  
Community Connections, Inc.  
281 Sawyer Drive, Suite 200  
Durango, CO 81303

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, 5<sup>th</sup> Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590. Phone 888-446-4511.

#### **TITLE VI COMPLAINTS, INVESTIGATIONS AND LAWSUITS**

Community Connections, Inc. has had no transportation related investigations, complaints, or lawsuits in the last 5 years, or since our last grant application.

#### **PUBLIC PARTICIPATION ELEMENT**

- Community Connections, Inc. is one of three direct providers of supports to individuals with intellectual and developmental disabilities in the greater 5 county region, and operates its programs and services without regard to sex, race, color, religion and national origin.
- Enrollment is open to all individuals that qualify for services based on criteria outlined in C.R.S. 25.5-10-202.
- If surveys found minorities were not being afforded the same opportunity to enroll in services, outreach would be conducted to educate those minority populations of the services available. Community connections, Inc. would work with area physicians, therapy providers, and school districts to ensure information is made available regarding services provided by the agency.
- Community connections, Inc. maintains a current website and social media sites to help educate the public on the availability of services.

#### **LIMITED ENGLISH PROFICIENCY (LEP) ELEMENT**

### **Community Connections, Inc. LEP PLAN**

#### **INTRODUCTION**

A **Limited English Proficiency (LEP)** person is one who does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English. The purpose of this Limited English Proficiency Plan is to outline the responsibilities of Community Connections, Inc. (CCI) in regards to Limited English Proficient (LEP) persons and establish a process for providing assistance to LEP persons for programs, activities, and services pursuant to Title VI of the Civil Rights Act of 1964 and Executive Order 13166.

#### **Title VI of the Civil Rights Act of 1964**

"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."

#### **Executive Order 13166**

Different treatment based upon a person's inability to speak, read, write, or understand English may be a type of national origin discrimination. Executive Order 13166 "Improving Access to Services for Persons With Limited English Proficiency," directs each Federal agency that is subject to the requirements of Title VI of the Civil Rights Act of 1964 to publish guidance for its respective recipients and sub-recipients

clarifying that obligation. The U.S. Department of Transportation (USDOT) published policy guidance on December 14, 2005 to clarify the responsibilities of recipients of Federal financial assistance from the USDOT.

### **Plan Summary -**

Community Connections, Inc. (CCI) has developed this Limited English Proficiency Plan (LEP) to provide language assistance for LEP persons seeking meaningful access to CCI programs and services, as required by Executive Order 13166 and USDOT's policy guidance. This plan details procedures on how to identify a person who may need language assistance, the ways in which assistance may be provided, and guidelines to notify LEP persons that assistance is available. The Four-Factor Analysis developed by the FTA requires that CCI evaluate the number and percentage of LEP persons in our area, and the nature, frequency and importance of the contact we have with LEP persons in providing transportation services for our clients. Each of these elements is addressed below.

## **FOUR FACTOR ANALYSIS**

**FACTOR 1: Number or proportion of LEP persons eligible to be served or likely to encounter CCI programs, activities, or services.** In order to determine the number of LEP persons, CCI collected various data from the US Census Bureau. This data was used to evaluate whether certain language groups met the Safe Harbor clause of the LEP guidance, whether a language LEP group exceeds 5% of the Montezuma and La Plata County's population. Using the Demographic Profile Date of Census 2010, the LEP population was ascertained. Based on the population for Montezuma County, 13.7% or 3500 is deemed an LEP person of American Indian descent; 12% or 3065 is deemed an LEP person of Hispanic or Latino descent. And based on the population for La Plata County, 17.4% or 3799 is deemed an LEP person of American Indian descent; 12.8% or 6571 is deemed an LEP person of Hispanic or Latino descent.

**FACTOR 2: Frequency with which LEP individuals come in contact with CCI programs, activities, or services.** CCI assesses the frequency at which staff has or could possibly have contact with LEP persons. This includes documenting client and/or interested parties inquiries received by the Title VI Coordinator. No previous LEP requests have been received thus far. Documentation of LEP requests will be done annually upon implementation of the LEP plan.

**FACTOR 3: Nature and importance of the program, activity or service provided by CCI to the LEP population.** CCI serves Archuleta County, Dolores County, La Plata County, Montezuma County, and San Juan County in southwest Colorado. Based on the DTR LEP Final Draft, none of the five counties listed have populations exceeding 5% or 1,000 persons requiring language assistance. Due to these numbers, it is not deemed cost effective to produce translated materials, this will be done on an as-needed basis when identified.

CCI has language cards available at the front desk to help identify what language is being spoken by the individual with LEP. When the language is identified, Google translator will be used to communicate basic information. If further communication is required, community Connections, Inc. will contact an interpreter and arrange a meeting. If the interpreter does not speak the language, the agency will network with the community and Division of Intellectual and Developmental Disabilities to ensure communication needs are met.

**FACTOR 4: Resources available to CCI and overall costs to provide LEP assistance.** CCI assessment for available resources is an ongoing activity. Initially, volunteer or staff translators and interpreters will be identified.

### **HOW TO IDENTIFY AN LEP PERSON WHO NEEDS LANGUAGE ASSISTANCE**

- Examine records of requests for language assistance from contact made with the Title VI Coordinator;
- All applications for services will be reviewed to assess applicant’s ability to speak and understand English;
- Have language cards available during any initial meetings to gauge the individual’s ability to speak and understand English. While staff may not be able to provide translation assistance at this meeting, the cards are an excellent tool to identify language needs.

### **LANGUAGE ASSISTANCE MEASURES**

- Community Connections, Inc. has U.S. Census “I Speak” language cards available to help identify what language is being spoken by the individual with LEP. When the language is identified, Google translator will be used to communicate basic information. If further communication is required, CCI will contact one of its contracted interpreters and arrange a meeting. If the interpreter does not speak the language, the agency will network with the community and Division of Intellectual and Developmental Disabilities to ensure communication needs are met.
- Based on our enrollment process, it would be known in advance that the agency would be providing services to an individual with Limited English Proficiency (LEP). The agency would prepare a plan specific to that individual to eliminate, or minimize any language barriers that may exist.
- CCI works with a number of individuals who are non-verbal, or have limited verbal ability. In these instances, the agency uses sign language, gestures, and speech devices to communicate with the individual, based on their needs.

### **STAFF TRAINING**

All CCI locations will be provided access to the LEP Plan and will be offered training on procedures and services available. Training topics will include:

- Understanding Title VI of the Civil Rights Act of 1964 and LEP responsibilities.
- LEP program responsibilities and obligations.
- Language assistance services offered.
- Use of LEP Language Assistance Cards (“I Speak Cards”).
- Documentation of language assistance requests received by TITLE VI coordinator.

### **PROVIDING NOTICE OF AVAILABLE LANGUAGE SERVICE TO LEP PERSONS**

Signs should be posted that language assistance is available in public areas such as at CCI administrative front desk offices, day program location bulletin boards and CCI’s website.

#### **Outreach Techniques**

Community connections, Inc. maintains a current website and social media sites to help educate the public on the availability of services.

## MONITORING AND UPDATING THE LEP PLAN

CCI will follow the Title VI Program monitoring and reporting schedule for the LEP Plan. Reports will address the following questions:

- How many LEP persons were encountered?
- What is the current LEP population in Archuleta County, Dolores County, La Plata County, Montezuma County, and San Juan County in southwest Colorado?
- Has there been a change in the languages where translation services are needed?
- Is there still a need for continued language assistance for previously identified CCI programs? Are there other programs that should be included? • Have CCI resources available, such as technology, staff, and financial costs changed?

## DISSEMINATION OF CCI LIMITED ENGLISH PROFICIENCY PLAN

CCI will post the LEP Plan on its website at <https://www.communityconnectionsco.org/title-vi.html> . Any person with Internet access will be able to view the plan. Copies of the LEP Plan will also be provided to the CCI clients and interested parties upon request.

## PLANNING AND ADVISORY BOARDS

### COMMUNITY CONNECTIONS, INC.

#### BOARD MEMBER/OFFICER LIST

2021

Name	Title	Race	Other
Sarah Kahn	Chairperson	White	
George Glass	Vice-Chair	White	
Cynthia Sadler	Secretary	White	
Janice Moen	Treasurer	White	
Alexandra Rodriquez	Member	Hispanic	Person w/Disability
Cynthia Sadler	Member	White	
Richard Siegele	Member	White	Person w/Disability
Jim Denier	Member	White	
Bob Conrad	Member	White	
Kirsten Searfus	Member	White	
Cathy Sykes	Member	White	Person w/Disability

**(From by-laws of Community Connections, Inc.)**  
**ARTICLE IV - Board of Directors**

**A. Composition and Representation:** An attempt will be made to have the Board of Directors composed of persons who represent the views of people with disabilities, professional and business communities, and strive to have at least one member from each county served. There shall be at least one (1) parent or family member of people with developmental disabilities and at least one person receiving supports from Community Connections, Inc. (CCI) serving as Board members. No employee of CCI, or employee or Director of any approved service agency of CCI, may serve as a member of the board of Directors of CCI. Recruitment: CCI makes every effort to recruit members of our Board of Directors who represent the makeup of the clients and counties we serve. Our focus and statutory obligation is on ensuring adequate representation by people with disabilities and family member of individuals with disabilities. The two counties we serve through our CDOT transportation have low percentages of Limited English Proficiency (LEP) residents (1.05% in La Plata County, 2.06% in Montezuma County).

**FACILITY LOCATION EQUITY ANALYSIS**

*Our organization has not constructed or changed any facilities in the last three years.*

**PART II.**

**REQUIREMENTS FOR FIXED ROUTE TRANSIT PROVIDERS ONLY**

**FIXED-ROUTE SYSTEMWIDE SERVICE STANDARDS**

**N/A – Does not apply**

**PART III.**

**METROPOLITAN PLANNING ORGANIZATIONS (MPOs) ONLY**

**N/A – Does not apply**

**APPENDICES**

Appendix A: Notice to the Public

Appendix B: Complaint/Investigations Table

Appendix C: Complaint Procedure

Appendix D: Complaint Form

Appendix E: Sample Service Standards for Fixed Route Provider – N/A

Appendix F: Sample Policies for Fixed Route Provider – N/A

Appendix G: Staff LEP survey N/A

**APPENDIX A**

**Title VI: Notice to the Public**

**Notifying the Public of Rights under Title VI – Community Connections, Inc.**



Community Connections, Inc. (CCI) operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act of 1964. To request additional information on CCI's Title VI and other anti-discrimination obligations, or if information is needed in languages other than English, please contact Matt Payne at (970) 385-3447 and/or email [matt@cci-colorado.org](mailto:matt@cci-colorado.org).

Title VI Notice to the Public is posted on CCI website <https://www.communityconnectionsco.org> ; Durango, CO locations - front office/281 Sawyer Drive, and office bulletin board/831 E. 31<sup>st</sup> Street; Cortez, CO locations – front office/105 S. Harrison, and office bulletin board/325 S. Pine Street.

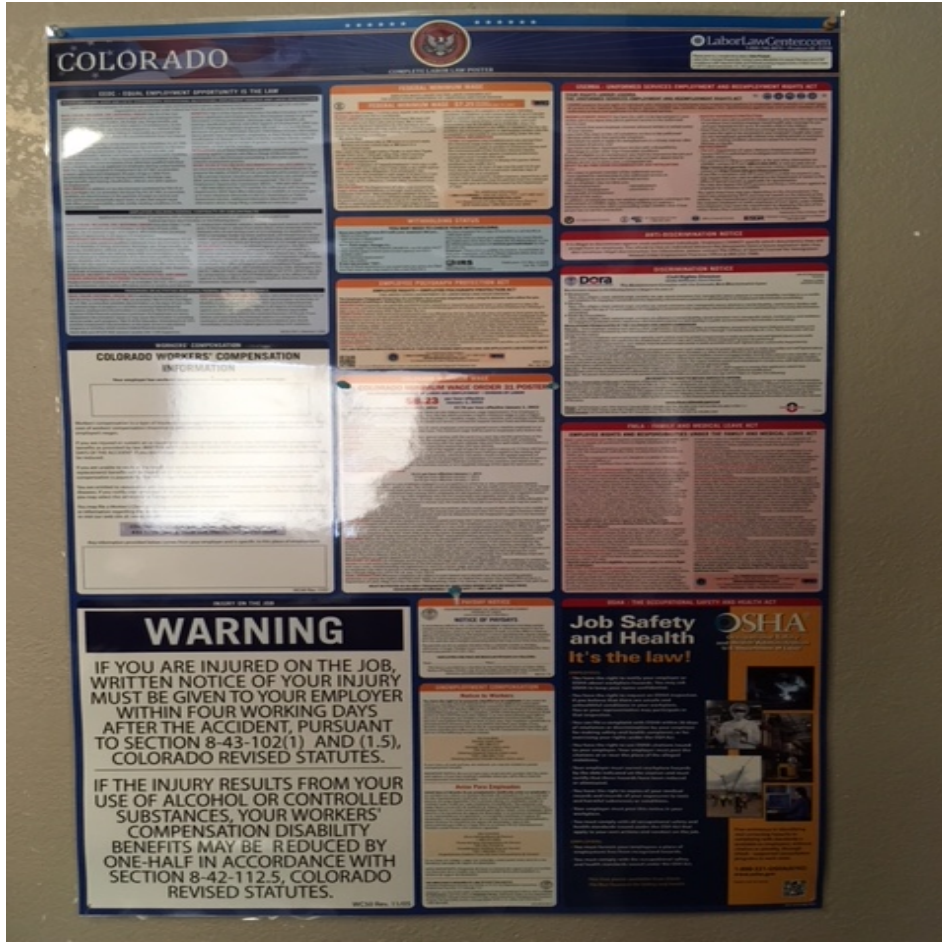
Any person who believes that he or she has been subjected to discrimination under Title VI may file a complaint with CCI by contacting the Title VI Coordinator.

Complaints must be filed within 180 days of the alleged discriminatory act. Please call the Office of Civil Rights or submit your complaint in writing to the Title VI Coordinator using the contact information below:

**Title VI Coordinator**

Matt Payne, Adult Services Program Director  
Title VI Coordinator, Community Connections, Inc.  
281 Sawyer Drive, Suite 200, Durango, CO 81303

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, 5<sup>th</sup> Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590. Phone 888-446-4511.



**APPENDIX B**

**INVESTIGATIONS/COMPLAINTS CHART**

Type	Date	Summary (basis)	Status	Action(s) taken
Complaints and Investigations Naming the recipient	<b>NO CURRENT COMPLAINTS</b>			
Lawsuits	<b>NO EXISTING LAWSUITS</b>			

**APPENDIX C**

**TITLE VI COMPLAINT PROCEDURE**

## Title VI: Complaint Process

Community Connections, Inc. (CCI) 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 Community Connections, Inc.

### **What is Title VI**

Title VI is a section of the Civil Rights Act of 1964 requiring that “No person in the United States shall on the grounds 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.” Note that Title VI does not address gender discrimination. It only covers race, color and national origin. Other Civil Rights laws prohibit gender discrimination.

### **Who are Limited English Proficient Persons?**

Persons who do not speak English as their primary language and who have limited ability to read, speak, write, or understand English can be limited English proficient, or “LEP.” These individuals may be entitled to language assistance with respect to a particular type of service, benefit, or encounter.

Different treatment based on a person’s inability to speak, read, write, or understand English may be a type of national origin discrimination.

### **How do I file a complaint?**

If you believe that you have received discriminatory treatment by the CCI on the basis of your race, color or national origin, you have the right to file a complaint with the CCI Title VI Coordinator. The complaint must be filed no later than 180 calendar days of the alleged discriminatory incident.

The Title VI Complaint Form is available at <https://www.communityconnectionsco.org/title-vi.html>.

### **Methods of filing a Complaint**

The preferred method is to file your complaint in writing using the Title VI Complaint Form, and sending it to:

#### **Title VI Coordinator**

Matt Payne  
Adult Services Program Director  
Title VI Coordinator  
Community Connections, Inc.  
281 Sawyer Drive, Suite 200  
Durango, CO 81303

Verbal complaints will be accepted and transcribed by the Title VI Coordinator. To make a verbal complaint, call (970) 385-3447 and ask for the Title VI Coordinator. Complaints may also be filed with external entities such as the [Federal Transit Administration \(FTA\)](#). Please review information on the respective agency websites for details on filing Title VI complaints.

Should a complaint be filed with CCI and an external entity simultaneously, the external complaint shall supersede the CCI complaint and the CCI’s complaint procedures will be suspended pending the external entity’s findings.

## **Investigations**

Within 10 working days of receipt of the formal complaint, the Title VI Coordinator will notify the complainant and begin an investigation (unless the complaint is filed with an external entity first or simultaneously).

The investigations will address complaints against any CCI department(s). The investigation will be conducted in conjunction with and under the advice of the Human Resource Department.

The investigation may include discussion(s) of the complaint with all affected parties to determine the problem. The complainant may be represented by an attorney or other representative of his/her own choosing and may bring witnesses and present testimony and evidence in the course of the investigation.

The investigation will be conducted and completed within 60 days of the receipt of the formal complaint.

Based upon all the information received, an investigation report will be written by the Title VI Coordinator for submittal to the Chief Administrative Officer.

The complainant will receive a letter stating that final decision by the end of the 60 day time limit. Most investigations are completed within 30 days.

The complainant shall be notified of his/her right to appeal the decision. Appeals may be made to the Federal Transit Administration.

## **APPENDIX D**

### **TITLE VI COMPLAINT FORM** **Community Connections, Inc. (CCI)**

CCI is committed to ensuring that no person is excluded from participation in or denied the benefits of its services on the basis of race, color, or national origin, as provided by Title VI of the Civil Rights Act of 1964, as amended. Title VI complaints must be filed within 180 days from the date of the alleged discrimination.

The completed form must be returned to:

Matt Payne  
Adult Services Program Director  
Title VI Coordinator  
Community Connections, Inc.  
281 Sawyer Drive, Suite 200  
Durango, CO 81303

Your Name:

Phone:

Street Address: Alt Phone:

City, State, & Zip Code:

Person(s) discriminated against (if someone other than complainant):

Name(s):

Which of the following best describes the reason for the alleged discrimination? (Circle one or more)

Date of Incident:

Race

Color

National Origin (Limited English Proficiency)

Please describe the alleged discriminatory incident. Provide the names and title of all Community Connections employees involved if available. Explain what happened and whom you believe was responsible. Please use the back of this form if additional space is required.

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Have you filed a complaint with any other federal, state or local agencies?

(Circle one) Yes / No

If so, list agency / agencies and contact information below:

Agency:

Contact Name:

Street Address, City, State & Zip Code:

Phone:

Agency:

Contact Name:

Street Address, City, State & Zip Code:

Phone:

I affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

Complainants Signature:

Date:

Print or Type Name of Complainant

**APPENDIX E**

**SERVICE STANDARDS (REQUIREMENT FOR ALL FIXED ROUTE TRANSIT PROVIDERS)**

**N/A – Does not apply**

**APPENDIX F**

**SERVICE POLICIES (REQUIREMENT FOR ALL FIXED ROUTE TRANSIT PROVIDERS)**

N/A – Does not Apply

**APPENDIX G**

**STAFF LEP SURVEY**

N/A – Does not Apply

*Sara Kene*

August 31, 2021

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**President CEO  
Community Connections, Inc.**

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**Date**