

Title VI Plan Laradon



Table of Contents

Section	Page
I. Statement of Client Rights under Title VI	1
II. Title VI Complaint Procedures and Complaint Form	3
III. List of Investigations, Complaints, and Lawsuits	7
IV. Public Participation Plan	8
V. Limited English Proficiency Plan (LEP)	8
VI. Language Assistance Plan	12
VII. Monitoring for Sub-recipient Compliance with Title VI	13
VIII. Board certification	14

I. Statement of Client Rights under Title VI

The Laradon Hall Society for Exceptional Children and Adults (Laradon) operates its services, programs, and activities without regard to race, color, national origin (ancestry), religion (creed), gender, gender expression, age, disability, marital status, sexual orientation, military status, or any other status protected by applicable local, state, or federal law. Laradon abides by the provisions of all applicable civil rights laws and regulations, including without limitation: Title VI of the Civil Rights Act of 1964; the Americans with Disabilities Act (ADA); and the Older Americans Act (OAA). For more information on Laradon's civil rights program, and the procedures to file a complaint, contact Laradon's Quality Assurance Specialist at (303) 296-2400 or visit our administration office at 5100 Lincoln Street, Denver, CO 80216.

Title VI Notice to the Public

Laradon has adopted and published the following Title VI Notice to the Public:

Laradon operates its services, programs, and activities without regard to race, color, national origin (ancestry), religion (creed), gender, gender expression, age, disability, marital status, sexual orientation, military status, or any other status protected by local, state, or federal law. Laradon abides by the provisions of all applicable civil rights laws and regulations, including without limitation: Title VI of the Civil Rights Act of 1964; the Americans with Disabilities Act (ADA); and the Older Americans Act (OAA).

For more information on Laradon's civil rights program and procedures for filing a complaint, contact (303) 296-2400 ext. 6802; email title.vi@Laradon.org; or visit our administration office at 5100 Lincoln Street, Denver, CO 80216. For more information, visit www.Laradon.org

For Title VI claims of discrimination on the basis of race, color, or national origin, a person may submit the complaint directly to the Federal Transit Administration (FTA), at the FTA Region 8 Office, Attn: Civil Rights Officer, 1961 Stout Street, Suite 13301, Denver, CO 80909

If information is needed in another language, contact (303) 296-2400.
Si se necesita la información en otro idioma llame al (303) 296-2400.

Notice Locations

Laradon's Title VI Notice is posted in English and Spanish in the following locations:

- Laradon's website at www.Laradon.org
- Laradon's headquarters at 5100 Lincoln Street, Denver, CO 80216, in the reception.

II. Title VI Complaint Procedures and Complaint Form

Anyone who believes they have been discriminated against by Laradon in violation of Laradon's Non-Discrimination Policy may file a complaint. If a person believes he or she has been discriminated against on the basis of race, color, or national origin (ancestry) (Title VI), or on the basis of religion (creed), gender, gender expression, age, disability, marital status, sexual orientation, military status, or any other status under applicable local, state, or federal law may file a Title VI and Other Discrimination Complaint Form. Laradon investigates all complete complaints received no more than 180 days after the alleged incident.

Once a complaint is received, Laradon will send a letter acknowledging the complaint and whether Laradon has jurisdiction to continue with an investigation.

Laradon has 60 days to investigate the complaint. If more information is needed to resolve the case, Laradon may contact the complainant. The complainant has 10 business days from the date of the letter to send the requested information to Laradon. If Laradon does not receive the requested information within 14 days from the mailing date, Laradon can administratively close the case. Laradon can also administratively close a case if the complainant no longer wishes to pursue the case.

After investigation of the complaint, Laradon 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 or discrimination violation and that the case will be closed. An LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether disciplinary action, additional training of the staff member, or other action will occur. If the complainant wishes to appeal the decision, he or she has 14 days from the date of the letter or LOF to do so.

For Title VI claims of discrimination on the basis of race, color, or national origin, a person may submit the complaint directly to the Federal Transit Administration (FTA), at the FTA Region 8 Office, Attn: Civil Rights Officer, 1961 Stout Street, Suite 13301, Denver, CO 80909.

Laradon's Title VI Complaint Form is set forth on the following pages. Laradon's non-discrimination policy includes Title VI's prohibition against discrimination on the basis of race, color, and national origin, as well as on several other protected statuses. Laradon's Title VI Form may be used for Title VI claims as well as to make a claim of discrimination on the basis of religion (creed), gender, gender expression, age, disability, marital status, sexual orientation, military status, and any other status protected by applicable local, state, or federal law.

Title VI Complaint Form to Laradon

Section I		
Name:		
Address:		
Phone (Home):	Phone (Work):	
E-mail address:		
Accessible Format Requirements?	Large Print? Yes <input type="checkbox"/> No <input type="checkbox"/> TDD? Yes <input type="checkbox"/> No <input type="checkbox"/>	Audio tape? Yes <input type="checkbox"/> No <input type="checkbox"/> Other:
Section II		
<p>Are you filing this complaint on your own behalf? Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p>If yes, please go to Section III.</p> <p>If no, please tell us the name and relationship to you of the person for whom you are completing this form:</p> <p>Name: _____ Relationship _____</p> <p>Please explain why you are completing this form for another person:</p> <p>Please confirm that you have obtained the aggrieved party's permission if you are submitting this form on behalf of another person. Yes <input type="checkbox"/> No <input type="checkbox"/></p>		

Section III

I understand that the purpose of many Laradon services and programs is to address the mobility challenges some individuals face because of age or disability. Apart from any eligibility requirements based on age or disability for receiving services, I believe that I experienced discrimination with regard to receiving the benefits of programs and/or services from Laradon based on the following (check all that apply):

Title VI: Race Color National origin (Ancestry)

Religion (Creed) Gender Gender expression Age Disability Marital status

Sexual orientation Military status Other status _____

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 the names and contact information of any witnesses. If more space is needed, please use the back of this form.

Section IV

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

Laradon
Attn: Teri Douglas Title VI Coordinator / Quality Assurance Specialist, 5100 Lincoln Street,
Denver, CO 80216

Or e-mail this form as an attachment to: title.vi@Laradon.org

Signature: _____ Date: _____

III. List of Investigations, Complaints, and Lawsuits

Under the requirements of Title VI, Laradon maintains a list of any of the following activities related to an allegation of discrimination on the basis of race, color, or national origin (ancestry) (Title VI); or an allegation of discrimination on the basis of religion (creed), gender, gender expression, age, disability, marital status, sexual orientation, military status, or other status protected by applicable local, state, or federal law:

- Complaints naming Laradon
- Active investigations conducted by the Federal Transit Administration (FTA) and entities other than the FTA
- Lawsuits

At this time, Laradon has no complaints, investigations, or lawsuits to report. However, the following is the form that will be updated as needed and available online at www.Laradon.org/about. This list shall include the date the relevant investigation, lawsuit, or complaint was filed; any actions taken by Laradon in response, or the final findings related to the investigation, lawsuit, or complaint. This list shall be included in the Title VI Plan that Laradon is required to submit to the FTA every three years.

Laradon Hall Society for Exceptional Children and Adults – List of Investigations, Complaints, and Lawsuits

	Date (Month, Day, Year)	Summary (include basis of complaint: race, color, national origin, etc.)	Status	Action(s) Taken:
Complaints				
1.				
2.				
3.				
Investigations				
1.				
2.				
Lawsuits				
1.				
2.				

IV. Public Participation Element

Teri Douglas, Quality Assurance Specialist, has been appointed Laradon's Title VI Coordinator. She is responsible for coordinating investigation and resolution of complaints related to services provided by Laradon.

Comments regarding our Title VI Plan may also be made directly to either Teri Douglas or by contacting Laradon's People Development Department at 5100 Lincoln Street, Denver, CO 80216 or by directly contacting by telephone at 303-296-2400 ext. 6802.

Outreach Plan

Throughout the year, Laradon staff members conduct outreach activities (directly to those client populations to whom we provide service as well as to community groups, professional associations, etc.) in various communities in our service areas and attend local government meetings. The purpose of these activities and presentations is to raise the level of awareness of the availability of our services and programs, and to engage with residents, governing bodies, and community groups about the needs of some in their communities and how best to address them. Laradon is committed to reaching and serving members of minority groups or under-represented populations.

Each year, Laradon reviews demographic information on its clients, including new clients. The results of this review helps guide Laradon's future outreach efforts.

As a nonprofit human services provider, Laradon seeks feedback on its mission services from clients and other members of the community. Laradon utilizes Advisory Committees and an engaged volunteer Board of Directors to assist us in evaluating and planning service design and implementation.

For information regarding Laradon's outreach plans to limited English proficient populations, see the following Sections V and VI.

V. LIMITED ENGLISH PROFICIENCY PLAN

Introduction

This Limited English Proficiency (LEP) Plan, for the Laradon Hall Society for Exceptional Children and Adults (Laradon) has been developed in response to federal requirements included under Section 601 of Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), which provides that no person 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."

Federal Executive Order No. 13166, issued in August 2000 by President Clinton, "Improving Access to Services for Persons with Limited English Proficiency," was created to "... improve

access to federally conducted and federally assisted programs and activities for persons who, as a result of national origin, are limited in their English proficiency (LEP)..." President Bush affirmed his commitment to Executive Order 13166 through a memorandum issued on October 25, 2001, by Assistant Attorney General for Civil Rights, Ralph F. Boyd, Jr. and Acting Assistant Attorney General, Loretta King directed a strengthening of enforcement of Title VI in a memorandum dated July 10, 2009.

As a sub-recipient of funds from the Federal Transit Administration (FTA), through the Colorado Department of Transportation (CDOT), this Limited English Proficiency (LEP) Plan for the Laradon Hall Society for Exceptional Children and Adults has been developed to ensure compliance with Federal LEP regulations. It includes an assessment of the limited English proficiency needs of our area, an explanation of the steps we are currently taking to address these needs, and the steps we plan to take in the future to ensure meaningful access to our transit programs by persons with limited English proficiency.

Limited English Proficiency Needs of Area

Laradon serves people with intellectual and developmental disabilities (IDD) in the following six counties: Adams; Arapahoe; Broomfield; Denver; Douglas; and Jefferson.

According to the US Census the LEP population in these areas breaks down as follows:

County	Total Population	Total LEP Population	Spanish LEP Population	Other Languages ¹
Adams	424,235	52,820 (12.45%)	44,305 (11.2%)	Vietnamese (2,136 people) Russian (1,000) Chinese (700) African Languages (500)
Arapahoe	556,245	50,332 (9.05%)	28,310 (5.09%)	Korean (3,467) African Languages (2,900) Russian (2,181) Vietnamese (2,462) Chinese (1,873) Arabic (1,248) Other Asian ² (1,456)

⁵ LEP number estimates are displayed only if 500 persons or more.

² The US Census Bureau’s “Other Asian languages” classification includes Turkic languages, Dravidian languages, and Tibetan-Burman languages. For a full listing of these languages, visit http://www.census.gov/hhes/socdemo/language/about/02_Primary_list.pdf

				Other Indic ³ (624) French (813) Tagalog (567)
Broomfield	50,287	2,601 (4.7%)	1,388 (2.51%)	-
Denver	589,391	67,832 (11.51%)	51,593 (8.75%)	Chinese (1,975) Russian (1,653) Other Indic languages (915) Vietnamese (3,868) Arabic (1,191) African Languages (2,127) Other Asian (750)
Douglas	279,291	6,896(2.47%)	3,198 (1.15%)	Chinese (894) Korean (666)
Jefferson	516,473	16,844(3.26%)	9,213 (1.78%)	Vietnamese (1,600) Chinese (600) Russian (500) Korean (500)
Total	2,415,922	197,325(8.2%)	138,091(5.7%)	

A significant part of the population of the Denver metro area has LEP needs, with the majority of them needing Spanish language assistance.

Visitors

There are many visitors to our area, and while they are less likely to use our service, which focuses on individuals with intellectual and developmental disabilities, there may be visitors who would like to ride our service. Spanish language literature and staff are available if the need should arise. Laradon transportation is designated for individuals with IDD enrolled in our programs but visitors may travel as an escort or companion.

Summary

There are a substantial number of LEP individuals in the Denver Metro area. While most of those who have difficulty with English are Spanish speakers, a variety of other languages are spoken as well, especially in Jefferson County. Some of these individuals may want to ride our service. Laradon will use other resources if needed to address other than Spanish language requests.

³ For a full listing the US Census Bureau's "Other Indic languages," visit http://www.census.gov/hhes/socdemo/language/about/02_Primary_list.pdf.

Nature, Frequency and Importance of LEP Contact

The nature and frequency of LEP contact is moderate for specialized transportation services in the Denver metro area. The largest frequency of contact is from the Spanish speaking population, making up for less than 5% of the population we serve. Spanish speaking Intake staff is able to handle these contacts.

Recognizing the importance of any LEP contact, strategies to address the need involving other language have been developed and will continually be reviewed, and improved where needed. Laradon serves individuals with IDD with individualized and targeted services. Some of them are nonverbal or have a limited verbal expression, which is recorded in their Individual Service Plan (ISP). The ISP documents how the individual with IDD wants to live and is a guiding document for all of Laradon's services.

The Denver Regional Council of Governments (DRCOG) has a refugee outreach program, which Laradon may utilize on a case by case basis.

Current LEP efforts

The numbers and percentages of LEP persons are significant in the Denver metro area. As a specialized transportation provider, we are committed to addressing the on-going need to service LEP individuals. We are providing individualized support to everyone we serve and our hiring and training practices are directed accordingly.

Plan for Future LEP Efforts

Given the current and potential future need to respond to individuals with Limited English proficiency, our LEP Plan includes the elements identified below.

Identifying LEP Persons Who Need Language Assistance

In order to identify potential future LEP needs with respect to our transit service, we will undertake the following:

- Review Census updates as they become available;
- Periodically review perceived LEP needs with drivers and other first-line staff;
- Make periodic contacts with other community agencies that may know of LEP persons or groups.

Language Assistance Measures

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

- Develop Spanish versions of marketing materials, customer complaint forms, public notices, and related information, as appropriate;
- Continue to hire Spanish-speaking staff;
- Obtain copies of CDOT's "Basic Spanish for Transit Employees" and distribute to drivers and customer service staff, as appropriate;
- Become familiar with web-based **Google Translator** for phrase translation into or from multiple languages;

- Identify other community resources such as agencies serving LEP persons, which may have resources to share.

Staff Training

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

- Federal LEP requirements, our LEP Plan and Title VI
- Documenting language assistance requests
- Use of any of the language assistance measures as described above

Outreach Efforts

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

- Identify agencies in our area that may serve LEP populations
- Provide information on your services to them, as appropriate
- Provide opportunities for LEP participation at public meetings, through advertising and conduct of meetings, as appropriate

Monitoring and Updating Plan

We will monitor and update this plan every 2-3 years, as needed. This will include:

- Reviewing 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

Disseminating Our LEP Plan

- Have copies of our plan available to give to agencies serving LEP populations in our area and or for individual requests
- Post our plan on your website

VI. Language Assistance Plan

How Will You Identify LEP Persons Who Need Language Assistance?

Individuals seeking services contact Laradon directly, or are referred by someone who assists them in the process (i.e. family member, case worker, or Community Centered Board).

Prospective riders register through our Intake Team, who have bilingual Spanish members.

How Will You Identify Language Assistance Measures?

If an individual needs language assistance other than what Laradon can provide through in-house resources, Laradon utilizes the resources available through the Denver Regional Council of Governments for access to translation services.

How Will Your Staff Be Trained?

Line Staff Training: Our staff includes team members who are Spanish bilingual.

Driver Training: Laradon Driving personnel include those who are Spanish bilingual. Driver meetings address the LEP issue as needed as determined by changes to the Plan, any concerns that may have been expressed by a rider, etc.

What Will Be Your Outreach Efforts?

Our most successful strategies for targeting our services to low-income, low-income minority, frail, and/or isolated people with intellectual and developmental disabilities (some of whom are LEP) continue to be our partnerships with organizations or agencies who serve these populations. In addition to conducting presentations to area organizations, Laradon routinely participates in community events such as health fairs and other community events. The Laradon team (i.e. marketing, transportation, or others as assigned) annually attend various community based events.

What Is Your Monitoring and Updating Plan?

Laradon will monitor and update this plan as needed and not less than once per year. This will include:

- Reviewing our LEP Plan with staff and make adjustments as needed.
- Monitoring demographic changes.
- Paying attention to any LEP-related complaints.

How Will You Disseminate Your LEP Plan?

- Copies of Laradon’s LEP plan are available to the many agencies and organizations with whom we partner that serve LEP populations in our service area.
- We have posted our plan on our website.

VII. Monitoring Sub-recipients for Title VI Compliance

Laradon requires that all of its sub-recipients of federal grant funds comply with Title VI of the Civil Rights Act of 1964. A sub-recipient is defined in the OMB Super Circular, 2 CFR Part 200 (<https://federalregister.gov/a/2013-30465>) as “a non-Federal entity that receives a sub-award from a pass-through entity [Laradon] to carry out part of a Federal program; but does not include an individual that is a beneficiary of such program.” Specifically, Laradon requires the following clauses in its Sub-recipient Agreements with sub-recipients:

Sub-awardee (or sub-recipient) agrees to comply with all applicable civil rights laws and regulations, in accordance with federal directives, except to the extent that the Federal Government determines otherwise in writing. These shall include, but are not limited to, the following:

- Nondiscrimination – Title VI of the Civil Rights Act. Sub-awardee agrees to comply, and assures the compliance of each subcontractor or third party contractor with the provisions prohibiting discrimination on the basis of race, color, or national origin of Title VI of the Civil Rights of 1964, as amended, 42 USC §§2000d et seq., and with CDOT regulations, “Nondiscrimination in Federally-Assisted Programs of the Department of Transportation – Effectuation of Title VI of the Civil Rights Act,” 49 CFR Part 21. Except to the extent FTA determines otherwise in writing, the Contractor agrees to follow all applicable provisions of the most recent edition of the FTA Circular 4702.1A, “Title VI and Title VI-Dependent Guidelines for Federal Transit Administration Grantees.” Any other applicable federal directives that may be issued.

- Each sub-recipient agrees to allow Laradon to verify its compliance with all applicable Title VI requirements upon Laradon's request. Such verification may be conducted through a review of sub-recipient's Title VI documents and procedures or an on-site visit.

VIII. Board Approval of Title VI Plan

In a meeting held on January 30, 2020 the Board of Directors of Laradon Hall Society for Exceptional Children and Adults approved and adopted this Title VI Plan.

**MINUTES OF ACTION
OF
BOARD OF DIRECTORS
OF THE LARADON HALL SOCIETY FOR
EXCEPTIONAL CHILDREN AND ADULTS**

Date: January 30, 2020

RE: Resolution to approve the Title VI Plan for Laradon Hall Society for Exceptional Children and Adults

Current: **Title VI Plan**

Upon the recommendation of the Laradon Society Board Executive Committee, the Laradon Society Board has unanimously voted and approved the Title VI Plan Laradon.



Larry Burgess
Chair, Laradon Society Board

January 30, 2020

Date