



Title VI Plan

June 2016

Table of Contents

Statement of Client Civil Rights Under Title VI.....	3
Notice Locations.....	4
Title VI Complaint Procedures and Complaint Form	5
Title VI Complaint Form (example)	6-8
List of Investigations, Complaints and Lawsuits.....	9
Public Participation Plan	10
Outreach Plan	10
Limited English Proficiency Plan (LEP)	11
Policy	11
Limited English Proficiency Needs of Area.....	11
Current LEP Plan.....	14
Plans for the Future of LEP Plans	15
Board Approval of Title VI Plan.....	16

I. Statement of Client Rights Under Title VI

Silver Key Senior Services (Silver Key) operates its services, programs and activities without regard to race, creed, color, ethnicity, national origin, religion, sex, sexual orientation, gender expression, age, physical or mental ability, veteran status, military obligations, and marital status or any other status protected by applicable local, state, or federal law. Silver Key abides by the provisions of all applicable civil rights laws and regulations, including without limitations: 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 Silver Key's civil rights program, and the procedures to file a complaint, contact Silver Key's Transportation department at (719) 884-0000; email transportationdepartment@silverkey.org; or visit www.silverkey.org.

Title VI Notice to the Public

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

Notice to the Public of Rights under Title VI

Silver Key Senior Services (Silver Key)

- Silver Key Senior Services (Silver Key) operates its services, programs and activities without regard to race, creed, color, ethnicity, national origin, religion, sex, sexual orientation, gender expression, age, physical or mental ability, veteran status, military obligations, and marital status or any other status protected by applicable local, state, or federal law. Silver Key abides by the provisions of all applicable civil rights laws and regulations, including without limitations: 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 Silver Key's civil rights program, and the procedures to file a complaint, contact Silver Key's Transportation department at (719) 884-0000; email transportationdepartment@silverkey.org; or visit www.silverkey.org.

Notice Locations

Silver Key's Title VI Notice is posted in English and Spanish in the following locations;

- Silver Key's website at www.silverkey.org
- Silver Key's headquarters at 2250 Bott Ave, Colorado Springs, CO 80904, in the Transportation area and reception area.
- Silver Key's second location at 1605-1655 S. Murray Blvd, Colorado Springs, CO 80916, in the dining area and Client Services Center.

II. Title VI Complaint Procedures and Complaint Form

Anyone who believes they have been discriminated against by Silver Key in violation of Silver Key'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. Silver Key investigates all complete complaints received no more than 180 days after the alleged incident.

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

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

After the investigation of the complaint, Silver Key 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 fourteen days from the date of the letter or LOF to do so.

For Title VI claims 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 St, Suite 13301, Denver, CO 80909.

Silver Key's Title VI Complaint Form is set forth on the following pages. Silver Key'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. So Silver Key'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

Instructions: If you would like to submit a Title VI complaint to Silver Key Senior Services, please fill out the form below and send it to:

Silver Key Senior Services,

Attn: Title VI Complaint

2250 Bott Ave.

Colorado Springs, CO, 80909.

For questions or a full copy of Silver Key Senior Services Title VI policy and complaint procedures call 719-884-2380.

1. Name (Complainant):																
2. Phone:	3. Home address (street no., city, state, zip):															
4. If applicable, name of person(s) who allegedly discriminated against you:																
5. Location and position of person(s) if known:	6. Date of incident:															
<p>7. Discrimination because of:</p> <table style="width: 100%; border: none;"><tr><td style="width: 33%;"><input type="checkbox"/> Race</td><td style="width: 33%;"><input type="checkbox"/> Ethnicity</td><td style="width: 33%;"><input type="checkbox"/> Gender expression</td></tr><tr><td><input type="checkbox"/> National origin</td><td><input type="checkbox"/> Religion</td><td><input type="checkbox"/> Veteran status</td></tr><tr><td><input type="checkbox"/> Creed</td><td><input type="checkbox"/> Sex</td><td><input type="checkbox"/> Marital Status</td></tr><tr><td><input type="checkbox"/> Color</td><td><input type="checkbox"/> Sexual orientation</td><td></td></tr><tr><td><input type="checkbox"/> Age</td><td><input type="checkbox"/> Physical or mental ability</td><td></td></tr></table>		<input type="checkbox"/> Race	<input type="checkbox"/> Ethnicity	<input type="checkbox"/> Gender expression	<input type="checkbox"/> National origin	<input type="checkbox"/> Religion	<input type="checkbox"/> Veteran status	<input type="checkbox"/> Creed	<input type="checkbox"/> Sex	<input type="checkbox"/> Marital Status	<input type="checkbox"/> Color	<input type="checkbox"/> Sexual orientation		<input type="checkbox"/> Age	<input type="checkbox"/> Physical or mental ability	
<input type="checkbox"/> Race	<input type="checkbox"/> Ethnicity	<input type="checkbox"/> Gender expression														
<input type="checkbox"/> National origin	<input type="checkbox"/> Religion	<input type="checkbox"/> Veteran status														
<input type="checkbox"/> Creed	<input type="checkbox"/> Sex	<input type="checkbox"/> Marital Status														
<input type="checkbox"/> Color	<input type="checkbox"/> Sexual orientation															
<input type="checkbox"/> Age	<input type="checkbox"/> Physical or mental ability															
<p>8. Explain as clearly as possible what happened and how you believe you were discriminated against. Indicate who was involved. Be sure to include how you feel other persons were treated differently than you. Also, attach any written material pertaining to your case.</p>																

9. Why do you believe these events occurred?

10. What other information do you think is relevant to the investigation?

11. How can this/these issue(s) be resolved to your satisfaction?

12. Please list below any person(s) we may contact for additional information to support or clarify your complaint (witnesses):

Name:

Address:

Phone number:

13. Have you filed this complaint with any other federal, state, or local agency; or with any federal or state court?

Yes

No

If yes, check all that apply:

Federal agency

Federal court

State court

Local agency

State agency

If filed at an agency and/or court, please provide information about a contact person at the agency/court where the complaint was filed.

Agency/Court:	Contact's Name:	Address:	Phone number:
Signature (Complainant):			Date of filing:

III. List of Investigations, Complaints, and Lawsuits

Under the requirements of Title VI, Silver Key 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;

At this time, Silver Key has no complaints

- Complaints naming Silver Key Senior Services
- Active investigations conducted by the Federal Transit Administration (FTA) and entities other than the FTA
- Lawsuits

At this time, Silver Key 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.silverkey.org.

This list shall include the date the relevant investigation, lawsuit, or complaint was filed; any actions taken by Silver Key in response, or the final findings related to the investigation, lawsuit, or complaint. This list shall be included in the Title VI Plan that Silver Key is required to submit to funders.

	Date Received Complaint	Date of Incident	Summary (Include basis of complaint: race, color, national origin, etc.)	Status	Action(s) Taken
Complaints					
Investigations					
Lawsuits					

IV. Public Participation Plan

Brad Bowles, Silver Key's Transportation Supervisor, who reports directly to the organization's President and CEO, has been appointed Silver Key Title VI Coordinator. Since Brad Bowles is already responsible for coordinating ADA and OAA compliance and any complaints, making him responsible for Title VI complaints as well as provides the public with one point of contact for any discrimination complaints. By assigning this additional responsibility to the position of Transportation Supervisor, Silver Key is ensuring there is someone responsible for overseeing and implementing it Title VI Plan.

Outreach Plan

Throughout the year, Silver Key staff members conducts outreach activities in various communities in our services areas, participate in committees and attend local government meetings. The purpose of these activities and presentations is to make more people aware of our services and programs, and to enter a dialogue with local residents and governing bodies about mobility need of some in their communities and how best to address them. It is also Silver Key's commitment to reach and serve as many members of minority groups or underrepresented populations as possible. Each year, Silver Key reviews demographic information on its clients, including new clients. The results of this review help guide Silver Key's future outreach efforts.

As a nonprofit human services provider, Silver Key seeks feedback on its mission services from clients and other members of the community. But Silver Key does not currently maintain any transit related planning boards, committees or advisory councils.

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

V. Limited English Proficiency Plan (LEP)

This Limited English Proficiency (LEP) Plan, for Silver Key Senior Services 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 Silver Key Senior Services has been developed to ensure compliance with Federal LEP regulations. It includes an assessment of the limited English proficiency needs of our geographic area, an explanation of the steps Silver Key Senior Services is 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.

A. Policy

It is the policy of Silver Key Senior Services to ensure that our programs and activities, normally provided in English, are accessible to Limited English Proficiency (LEP) persons and thus do not discriminate on the basis of national origin in violation of the Title VI prohibition against national origin discrimination. Silver Key Senior Services will, to the maximum extent feasible in its official deliberations and communications, community outreach and related notifications; provide appropriate alternative non-English formats for persons with LEP to access information and services provided.

B. Limited English Proficiency Needs of Area

The *Four-Factor Analysis* developed by the FTA requires that information be included in LEP Plans regarding 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 transit services. Each of these elements is addressed below.

Factor 1 - Number and Percentage of LEP Persons in Our Area Permanent Population

The 2010 U.S. Census provides information to assist in estimating the number of limited English speakers in the permanent population. **Table 1** presents information for El Paso County, Colorado Springs, Fort Carson, and Manitou Springs on Language Spoken at Home by ability to speak and communicate in English.

TABLE 1 – INDIVIDUALS SPEAKING ENGLISH “LESS THAN VERY WELL”

Data Category	El Paso County		Colorado Springs		Manitou Springs	
	Number	Percent	Number	Percent	Number	Percent
Total Population (5 years old and older)	567,317	100%	381,525	100%	4,835	100%
Population Speaking English "Not Well" or "Not at All"						
English Only	557,006	98%	375,117	98%	4,820	100%
Spanish	7,319	2%	6,408	2%	15	0%
Other Indo-European	663	0%	473	0%	0	0%
Asian and Pacific Islander	2,069	0%	1,542	0%	0	0%
Other	260	0%	260	0%	0	0%
Total	10,311	100%	8,683	100%	15	100%

Source: 2010 U.S. Census

The total El Paso county population that had difficulty speaking English (Population speaking English “Not Well” or “Not at All”) is estimated at 10,311 or 2%; 2% of the City of Colorado Springs population has difficulty with English.

The Census data represents a relatively low need and level of response to individuals in Silver Key’s service area, predominantly in Colorado Springs. Persons who do have difficulty with English are primarily Spanish speaking, though there is also a significant population of Asian and Pacific Islander in El Paso County.

In addition to U.S. Census Data, Silver Key also collects and evaluates ethnicity data from the Colorado State Demographer’s Office. This data is not language specific as the Census data, but provides a summary of populations that may have difficulty with English. Table 2 shows these results.

TABLE 2 – EL PASO COUNTY ETHNICITY – BY AGE

El Paso County - Ethnicity	Total	Less than 18	18-24	25-34	35-44	45-54	55-64	65-74	75+
White alone, not Hispanic or Latino	447,947	100,432	46,274	60,115	59,128	72,641	56,398	29,706	23,253
Hispanic or Latino	93,665	35,876	11,775	15,252	12,036	9,432	5,160	2,602	1,532
Black alone, not Hispanic or Latino	35,792	9,872	4,586	5,558	4,987	5,458	2,886	1,540	905
Asian alone, not Hispanic or Latino	16,492	3,468	1,641	2,560	2,692	2,755	1,757	946	673
American Indian and Alaska Native Alone, Not Hispanic or Latino	3,693	924	475	569	547	560	381	152	85
Native Hawaiian and other Pacific Islander, not Hispanic or Latino	1,911	563	281	354	245	244	147	53	24
Other, not Hispanic or Latino	1,147	451	140	158	131	137	83	34	13
Two or more races, not Hispanic or Latino	21,616	11,090	2,853	2,921	1,858	1,599	762	341	192

Source: Colorado State Demographer’s Office

The State Demographer’s Office data shows the population of El Paso County broken down by ethnicity. Hispanic or Latino represents 15% of the total population, which correlates with the 2010 U.S. Census Data. Of those who identify themselves as Hispanic or Latino, 2% speak English “Not Well” or “Not at All” of which correlates with the scope and frequency of our outreach efforts.

Though the overall need for outreach is relatively small, Silver Key does have some daily interaction with persons whose principal language is Spanish. We have based our LEP Plan efforts on this population, while maintaining a commitment to evaluate and update the plan depending on changes in circumstances.

Visitor Population

More than 5 million visitors travel to the Pikes Peak region each year (www.visitcos.com). Of those, few take advantage of Silver Key's services due to our specialization in providing services for those over 60 years of age.

Nature, Frequency and Importance of LEP Contact

In addition to Census Data, Silver Key Senior Services gathered internal data from the Transportation Department to establish usage and assistance levels for current passengers. There are three (3) Spanish-speaking clients with Limited English Proficiency using Silver Key's transportation services anywhere from one (1) and two (2) trips per week.

Though the nature and frequency of LEP contact is relatively low, the contact is important for reasons that include the recurring and critical nature of those individuals' transit needs.

Resources Available for LEP Outreach

The final component of the Four-factor Analysis is an inventory of the resources required to conduct targeted LEP outreach. Our research indicates that the Spanish-speaking LEP population represents an immediate need. Resources will be directed accordingly in the initial stages of the LEP Plan process. The following resources will be required in developing the initial elements of the plan:

- Technology that may include language translation resources, real time translation capabilities, and other technology as it becomes identified
- LEP training of staff and drivers, performance monitoring of the LEP plan, and periodic updating as needed
- Materials and services that will include printed materials in Spanish and potentially other languages in the future as emerging LEP populations are identified

Summary

Though the need for outreach is relatively small, there is some daily interaction with persons whose principal language is Spanish. The Silver Key LEP Plan efforts will be based on the Spanish-speaking population initially, while maintaining a commitment to evaluate and update the plan depending on changes in circumstances and population demographics.

C. Current LEP Plan

There are two variables that drive Silver Key's LEP efforts: 1) current ridership of Spanish speaking individuals and 2) future ridership of Spanish speaking individuals. To address these current markets, Silver Key has initiated the following efforts:

- Translate and publish a limited number of transportation intakes and supporting materials in Spanish. The materials will be available upon request. Additionally, contact information for available programs and initiatives will be posted onboard the vehicles.
- Silver Key Senior Services currently has one Spanish-speaking person in the Transportation Department. There is one staff driver available to assist those riding on the vehicle. Contact

information:

Danny Valenzuela, Transportation Department – Driver, 719.884.2391

- Silver Key Senior Services will also obtain copies of CDOT’s “Basic Spanish for Transit Employees” and distribute them to drivers and customer service staff, as appropriate.
- Silver Key Senior Services anticipates adopting this document by the end of 2016.

Given the scale of the current need for LEP services, Silver Key Senior Services believes that this plan adequately addresses the need as well as positioning Silver Key Senior Services for an expansion of LEP Plan efforts, should that need be established.

D. Plans for the Future of LEP Plans

The current plan is sufficient for present conditions and services. Given the growing population of our clientele in the coming years, LEP efforts include regularly monitoring and updating the Plan.

Maintenance of Effort: Identifying LEP Persons Who Need Language Assistance

As part of ongoing commitment to bridging communication gaps with persons who have limited English proficiency, Silver Key Senior Services will maintain the following efforts:

- Review Census updates as they become available;
- Periodically review perceived LEP needs with our transit staff and drivers;
- Develop Spanish versions of marketing materials, public notices, and related information, as appropriate;
- Consider hiring Spanish-speaking individuals when hiring drivers;
- Become familiar with Language Line Services at <http://languageline.com>;
- Identify other community resources such as agencies serving LEP persons which may have resources to share;
- Document language assistance requests;
- Provide opportunities for LEP participation at public meetings, through advertising and conducting meetings, as appropriate.

Monitoring and Updating Plan

Silver Key Senior Services will monitor the LEP Plan annually and update the Plan every 2-3 years, or as needed. These efforts will include:

- Pay particular attention to demographic changes in the area that have the potential to affect LEP strategies;
- Review LEP-related complaints quarterly and develop programs to mitigate them;
- Disseminate the LEP Plan, as appropriate;
- Provide copies of the plan to agencies serving LEP populations in our area and/or individual requests;
- Post the LEP Plan and subsequent changes on the Silver Key website.

VIII. Board Approval of Title VI Plan

Board Approval took place on June 21, 2016.