



Title VI Plan

Adopted: January 27, 2021

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Background

Silver Key Senior Services, Inc. (Silver Key) is a nonprofit organization with a mission to serve in partnership with our stakeholders to support a healthy quality of life for seniors, allowing them to age safely with dignity and independence. Silver Key provides personalized transportation, nutritional and behavioral healthcare, guardianship, thrift store services, and volunteerism. Silver Key is funded by a combination of federal, state, and local grants as well as client and community donations.

Silver Key’s personalized transportation service is called Reserve & Ride. After registering with the transportation department, clients age 60 and over may schedule rides over the phone for medical and dental appointments, grocery shopping, and other activities. Rides in one of Silver Key owned and operated vehicles are provided by both staff and volunteer drivers during weekday daytime hours. The vehicles are stored overnight at the Silver Key main campus at 1625 S. Murray Blvd. in Colorado Springs.

Silver Key transportation services are currently funded by the Federal Transit Administration (FTA) as a subcontractor through an administrator selected by the Colorado Department of Transportation (CDOT) and other funding streams. Silver Key agrees that, as a condition to receiving any Federal financial assistance from the Department of Transportation, it will comply with Title VI of the Civil Rights Act of 1964 and all requirements for nondiscrimination in Federally assisted programs of the Department of Transportation.

Through its policies, procedures, and assurances, Silver Key makes every effort to ensure 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 otherwise subjected to discrimination under any program or activity for which Silver Key receives Federal financial assistance from the Department of Transportation, including the Federal Transit Administration.

Silver Key’s Nondiscrimination Policy is posted on its website at www.silverkey.org:

Silver Key Senior Services, Inc. follows a nondiscrimination policy and employs personnel without regard to race, creed, color, ethnicity, national origin, religion, age, sex, sexual orientation, gender identity or expression, genetic information, physical or mental ability, veteran status, military obligations, and marital status or any other applicable status protected by federal, state or local laws in any of its activities or operations.

Title VI Notice to the Public

Silver Key has adopted and published the following “Title VI Notice to the Public of Rights Under Title VI”:

Silver Key Senior Services, Inc. operates its services, programs and activities without regard to race, creed, color, ethnicity, national origin, religion, sex, sexual orientation, gender identity or expression, genetic information, 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 to obtain the form and procedures to file a complaint, contact Silver Key at 719-884-2300; email info@silverkey.org; visit our website at www.silverkey.org; visit or mail to our administrative office at 1625 S. Murray Blvd., Colorado Springs, CO 80919.

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

If information is needed in another language, contact 719-884-2300.

Si necesita información en otro idioma, comuníquese al 719-884-2300.

Silver Key’s Title VI Notice is posted in both English and Spanish (Appendix A) in the following locations, and can be translated into other languages upon request:

- Link on Silver Key’s homepage of its website at www.silverkey.org
- Displayed at Silver Key’s headquarters at 1625 S. Murray Blvd., Colorado Springs, CO 80916, in the reception areas, transportation area, and public meeting rooms
- Displayed in all Silver Key vehicles
- Displayed at all Silver Key Connections Café meal service locations
- Included in all Silver Key service-specific welcome guides and packets

Title VI Complaint Procedures and Complaint Form

Silver Key's Nondiscrimination Policy includes Title VI's prohibition against discrimination on the basis of race, color, and national origin, as well as several other protected statuses. Therefore, Silver Key's Title VI Complaint Form and procedures may be used for Title VI transportation discrimination claims as well as to make any other service claim of discrimination on the basis of religion, creed, sex, sexual orientation, gender, gender identity or expression, genetic information, age, physical or mental ability, veteran status, military obligations, marital status and any other status protected by applicable local, state, or federal law.

- The Complaint Form (Appendix B) and Procedure (Appendix C) are available on the website, by email, by mail, or in-person, and are available in English and Spanish. When reasonable, other languages may be provided upon request.
- Complaints shall be made in writing by completing, signing, and dating the Complaint Form. If a complainant is unable or incapable of completing a written Complaint Form, a verbal complaint may be made the Silver Key Title VI Coordinator by calling Silver Key's main phone number. The Coordinator will interview the complainant and assist in converting the verbal complaint into writing.
- Silver Key investigates all complete complaints received within 180 days after the alleged incident.
- Anyone who believes they been discriminated against in violation of Silver Key's Nondiscrimination Policy or has a complaint about the accessibility of transportation services may file a complaint by completing and submitting Silver Key's Title VI and Other Discrimination Complaint Form according to the following complaint procedure. These procedures do not deny the right of the complainant to file formal complaints with other State or Federal agencies or to seek private counsel for complaints alleging discrimination.
- Every effort will be made to obtain early resolution of complaints at the lowest level possible. The option of informal mediation meeting(s) between the affected parties and Silver Key may be utilized for resolution.
- Complaint Investigation Procedures:
 1. Once a completed Complaint Form is received, Silver Key will review it within 10 calendar days for completeness, to determine if our organization has jurisdiction to investigate, and whether the complaint has sufficient merit to warrant an investigation.
 2. Within fifteen calendar days, the complainant will receive an acknowledgement letter by registered mail informing him/her:
 - If a decision is made not to investigate the complaint, the letter shall specifically state the reason.
 - If the complaint is to be investigated, the letter shall state whether the investigation will be completed by Silver Key or has been referred to the appropriate State or Federal agency holding sufficient jurisdiction.
 - If the Complaint Form is incomplete, additional information will be requested. The complainant will be provided 60 calendar days from the date of the incident to submit

the required information. Failure to do so may be considered good cause for a determination of no merit to investigate.

- Full cooperation will be required by the parties to assist the investigation.
3. If the complaint has investigative merit, the President and CEO of Silver Key will instruct the Human Resources Department, serving as Title VI Coordinators, to investigate the complaint and report findings within 60 calendar days from receipt of the completed Complaint Form.
 - If more information is needed to resolve the case, Silver Key may contact the complainant by registered mail. The complainant has fourteen calendar days from the date of receipt of the follow-up letter to send the requested information to Silver Key or the investigator assigned to the case.
 - If Silver Key or the investigator is not contacted by the complainant or does not receive the additional information within fourteen business days from the receipt date, Silver Key can decide to administratively close the case.
 - A case can also be administratively closed if the complainant no longer wishes to pursue the case.
 - The investigative report will include a written description of the incident, summaries of all persons interviewed, and a finding with recommendations including conciliatory measures where appropriate.
 4. If the complaint is delayed for any reason, the Title VI Coordinator will notify all parties and an extension will be requested from the State and/or Federal authorities.
 5. After the investigation of the complaint, the President and CEO of Silver Key will issue one of two letters to the complainant via registered mail: 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 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 fourteen days from the date of the letter or LOF to do so.
 6. If the complainant wishes to appeal the decision, she/he has fourteen days from the date of the letter or LOF to submit an appeal to the Silver Key President and CEO (CEO) at 1625 S. Murray Blvd., Colorado Springs, CO 80916, stating the basis for the reconsideration. The CEO will notify the complainant by registered mail of the decision either to accept or reject the request for reconsideration within ten days. If reconsideration is granted, the Board Chair will issue a final determination letter upon completion of the review.
 7. If the complainant remains dissatisfied with Silver Key's resolution of the complaint, she/he has the right to file a complaint with:

Colorado Department of Transportation
Division of Transit and Rail
4201 East Arkansas Avenue
Denver, CO 80222
303-757-9766
rob.andresen@state.co.us

or
Federal Transit Administration
Region 8
Attn: Civil Rights Officer
12300 West Dakota Avenue
Suite 310
Lakewood, CO 80228
Phone: 720-963-3300
Fax: 720-963-3333

To submit a Complaint Form, the preferred method is to mail your Complaint Form to our administrative office at 1625 S. Murray Blvd., Colorado Springs, CO 80919 or call 719-884-2300 for other options.

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 St, Suite 13301, Denver, CO 80909.

If information is needed in another language, contact 719-884-2300.
Si necesita información en otro idioma, comuníquese al 719-884-2300.

Title VI List of Complaints, Investigations, 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 (Title VI); or an allegation of discrimination on the basis of religion, creed, sex, sexual orientation, gender, gender identity or expression, genetic information, age, physical or mental ability, veteran status, military obligations, marital status or other status protected by applicable local, state, or federal law.

The Silver Key Human Resources Manager, who reports to the organization's Director of Human Resources and Volunteer Engagement, has been appointed Silver Key Title VI Coordinator. The Silver Key Human Resources Manager will be responsible for ADA, OAA, and Title VI compliance and any complaints, providing employees and the public with one point of contact for any discrimination complaints. The HR Manager will also implement and provide oversight of Silver Key's Title VI Plan.

Silver Key will inform CDOT whenever there is a Title VI complaint and report on investigations or lawsuits related to such complaints. Active investigations may be conducted by Silver Key, the Federal Transit Administration (FTA), and entities other than the FTA.

Tracking and reporting will be maintained through a Nondiscriminatory Policy and Title VI Complaint, Investigation, and Lawsuits log. (Appendix D) This log shall be categorized by Complaints, Investigations, and Lawsuits and will include:

- Date the complaint was received
- Date of the incident

- Summary/the basis of the complaint
- Status of the complaint
- Action(s) taken by Silver Key in response including Final Findings.

Silver Key will include this log as part of our Annual Certification and Assurance submission to CDOT, the subrecipient, and the FTA. If there are any incidences, the log will also be available online at www.silverkey.org.

- At this time, Silver Key has no outstanding complaints, investigations, or lawsuits naming Silver Key Senior Services that allege discrimination on the basis of race, color, or national origin with respect to transportation services.
- During the course of the last three years, there have not been any civil rights compliance review activities conducted with respect to Silver Key transportation services and, to the best of our knowledge, there are not presently any ongoing civil rights compliance review activities being conducted with respect to Silver Key transportation services.
- Additionally, there are currently no pending Silver Key construction projects which would require a Title VI Equity Analysis or negatively impact minority communities being performed by Silver Key.

Outreach and Public Participation Plan

Silver Key conducts outreach to general community senior populations, including minority and LEP populations, to gain a variety of diverse perspectives regarding core and prospective services and encourage participation as available.

- Silver Key’s website at www.silverkey.org provides thorough details about the organization, programs, services, and participation opportunities as available. The website also includes a variety of options to Contact Us. A list of the Silver Key Board of Directors and the Leadership Team are posted to the website.
- A description of Silver Key services for area seniors and how to contact the organization to receive services are also provided by several senior resource organizations including:
 - Pikes Peak Area Council of Governments Yellow Book online and print version
 - City of Colorado Springs Mountain Metro Transit website
 - Pikes Peak United Way’s 2-1-1 phone reference center and online searchable database
 - El Paso County community service providers handout and Older Adults resources website
 - UCCS HealthCircle Aging Center website
 - Senior Blue Book resource printed and online guides
 - Seniors Resource Guide website
 - Various partner agency and media online and print calendars, menus, and services
- The annual financial report is available online each year.
- Silver Key conducts ongoing surveys with clients regarding services.
- Silver Key performs regular, ongoing outreach (press releases, emails, calls, etc.) to the area media to share information with the community about the organization’s services and participation opportunities as they are available.

- Silver Key uses social media channels, eNewsletters, and flyers to communicate with stakeholders, including clients and potential clients, about:
 - Service areas and any changes to services
 - Participation opportunities as they are available, including update meetings and focus groups
 - Planned changes to the campus and facilities
- Silver Key places paid advertising in a variety of channels to reach diverse senior audiences, including being an inaugural partner in the *SouthEast Express* diversity-focused community newspaper and website.

Throughout the year, Silver Key staff members conducts outreach activities in various communities in our service area, participate on 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 senior mobility and other needs in the communities they serve, 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, partners, and other members of the community. Silver Key has periodically used advisory councils to gain insight, including the Silver Key Active Living advisory council to learn about program preferences and opportunities for participation for the diverse community geographic area the campus is located in.

For information regarding Silver Key’s outreach plan to limited English proficient populations, see the following section.

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 subcontractor 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 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 and other services by persons with Limited English proficiency.

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 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.

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. This is the primary service area for Silver Key.

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 Services

Silver Key provides senior services primarily to registered clients who are residents of El Paso. Transit services are not available to visitors to the area.

Factors 2 & 3 - 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 two (2) Spanish-speaking clients with Limited English Proficiency using Silver Key's transportation services anywhere from one (1) and two (2) trips per month.

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.

Factor 4 - 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 have been directed accordingly, including:

- 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
- Monitoring requests for service assistance in other languages through our main community contact phone line and email address.

Summary

There is daily interaction with persons whose principal language is Spanish. The Silver Key LEP Plan efforts will be based on the Spanish-speaking population, while maintaining a commitment to evaluate and update the plan depending on changes in circumstances and population demographics.

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 are available upon request. Additionally, contact information for available programs, services, and initiatives will be posted onboard the vehicles.
- Silver Key currently has two Spanish-speaking persons in the Transportation Department. There is one staff driver available to assist those riding on the vehicle. Contact information:

Patrick Gutierrez, Transportation Department – Driver, 719-884-2391

Al Morales, Transportation Department – Driver, 719-884-2391

- Silver Key has obtained CDOT’s “Basic Spanish for Transit Employees” and distributed them to drivers and customer service staff, as appropriate.
- Training for Customer Service and Transportation Department staff on how to respond to an LEP caller or client request. Using Google Translate as needed for translation..
- Identifying LEP speaking and writing abilities on the application for employees and volunteers. Maintaining a organization-wide LEP capabilities database.

Given the scale of the current need for LEP services, Silver Key believes that this plan adequately addresses the need as well as positioning Silver Key to monitor and identify if and when an expansion of LEP Plan efforts may need to be established.

Future 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 May Need Language Assistance

As part of ongoing commitment to bridging communication gaps with persons who have limited English proficiency, Silver Key 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;
- Identify other community resources such as agencies serving LEP persons which may have resources to share;
- Document language assistance requests;
- Communicate about opportunities for LEP participation through client and community input surveys and meetings, as appropriate.

Monitoring and Updating Plan

Silver Key Senior Services will monitor the LEP Plan annually and update the Plan every two-three 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 suggestions and complaints annually and develop programs to mitigate them;
- Disseminate the LEP Plan on the Silver Key website and through other methods as appropriate;
- Provide copies of the Plan to agencies serving LEP populations in our area and/or individual requests.

- Monitor and track staff and volunteer feedback regarding LEP efforts and to identify needs and opportunities. Conduct annual staff survey (Appendix E).

Board Representation and Approval of Title VI Plan

Silver Key is a nonprofit organization, currently managed by a twelve-member Board of Directors. Silver Key bylaws require no more than 16 board members that can serve no more than two consecutive two-year terms. The process of board member solicitation includes posting the board opening on the Silver Key website at www.silverkey.org and requesting referrals from existing board members. The board member description includes notification to ensure that Silver Key does not discriminate on the basis of race, color, or national origin. All posted notices requesting board member applications encourage the participation of minorities and individuals with disabilities. Final board membership must be approved by a majority vote of the board.

The racial breakdown of the current board is five Caucasian females; six Caucasian males; and one 2-or-more races female:

Board Member Name	Female	Male	Racial breakdown
Black, Howard - Secretary		X	White
Broeckelman, Gregory		x	White
Bunkers, David - Treasurer		x	White
Hartsell, Carla	x		White
Hunsinger, Steve - Chair		x	White
Jones, Lynne – Past Chair	x		White
Karns, Cari	x		White
McCannn, Norma DeAnne	x		White
Noblitt, Steven		x	White
Shalabi, Shahera – Vice Chair	x		2-or-more races

In January 2021, the Silver Key Board of Directors approved the Title VI Plan, including the LEP Plan, based on electronic vote. (Appendix G)

Compliance and Annual Certification and Assurance

1. Silver Key will annually submit its Title VI certification and assurance as required to the subrecipient, CDOT and the FTA. Silver Key acknowledges that additional information may be requested to ensure compliance with Title VI.
2. Silver Key will review, update, and resubmit the Title VI plan, including the LEP plan, every two-three years, as appropriate.
3. Silver Key inserts the following “Title VI Clause Regarding All Contracts Subject to Title VI” into every contract subject to Title VI:

During the performance of this contract with Silver Key Senior Services, Inc. (Silver Key) the contractor agrees to comply with Title VI nondiscrimination regulations:

Overview of **Title VI**

Title VI, 42 U.S.C. § 2000d et seq., was enacted as part of the landmark Civil Rights Act of 1964. It prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance.

4. Any vendor, contractor, staff, or volunteer will not be discriminated against on the basis of race, color, or national origin, as a result of any contracted work or be displaced from their homes or businesses. “Facilities” in this context refers to potential storage facilities, maintenance facilities, and operation centers even if the construction is financed with non-FTA funds.
 - As part of the planning process, prior to the selection of the preferred site and the actual construction of a facility, Silver Key will perform a Title VI Equity Analysis to ensure there is equity and nondiscrimination. If a Title VI Equity Analysis is required, the analysis will be included in the Title VI plan.

APPENDICES

Appendix A: Notice to the Public

Notice to the Public of Rights under Title VI

Silver Key Senior Services, Inc. (Silver Key)

Silver Key Senior Services, Inc. operates its services, programs and activities without regard to race, creed, color, ethnicity, national origin, religion, sex, sexual orientation, gender identity or expression, genetic information, 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 at 719-884-2300; email info@silverkey.org; visit our website at www.silverkey.org; or visit our administrative office at 1625 S. Murray Blvd., Colorado Springs, CO 80919.

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 St, Suite 13301, Denver, CO 80909.

If information is needed in another language, contact 719-884-2300.

Si necesita información en otro idioma, comuníquese al 719-884-2300.

Appendix B: Title VI Complaint Form



Title VI Complaint Form

Title VI of the Civil Rights Act of 1964 states, “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.”

Please provide the following information necessary in order to process your complaint. Assistance with completing this form is available upon request. Title VI complaints must be filed within 180 days from the date of the alleged discrimination. Complete this form and mail or deliver to:

Silver Key Senior Services, Title VI, 1625 S. Murray Blvd, Colorado Springs, CO 80916
 Contact us Monday – Friday, 8 a.m. - 5 p.m. at 719-884-2300 or email info@silverkey.org

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):
 Race Color National Origin Sex Other Category _____
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
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Section V

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 Agency _____
 State Court _____ 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.

Si necesita información en otro idioma, comuníquese al 719-884-2300.

Signature and date required below

Signature

Date

Appendix C: Title VI Complaint Procedure

Anyone who believes they been discriminated against in violation of Silver Key’s Nondiscrimination Policy or has a complaint about the accessibility of transportation services may file a complaint by completing and submitting Silver Key’s Title VI and Other Discrimination Complaint Form according to the following complaint procedure. These procedures do not deny the right of the complainant to file formal complaints with other State or Federal agencies or to seek private counsel for complaints alleging discrimination. Silver Key investigates all complete complaints received within 180 days after the alleged incident.

Every effort will be made to obtain early resolution of complaints at the lowest level possible. The option of informal mediation meeting(s) between the affected parties and Silver Key may be utilized for resolution.

COMPLAINT INVESTIGATION PROCEDURES:

1. Once a completed Complaint Form is received, Silver Key will review it within 10 calendar days for completeness, to determine if our organization has jurisdiction to investigate, and whether the complaint has sufficient merit to warrant an investigation.
2. Within fifteen calendar days, the complainant will receive an acknowledgement letter by registered mail informing him/her:
 - If a decision is made not to investigate the complaint, the letter shall specifically state the reason.
 - If the complaint is to be investigated, the letter shall state whether the investigation will be completed by Silver Key or has been referred to the appropriate State or Federal agency holding sufficient jurisdiction.
 - If the Complaint Form is incomplete, additional information will be requested. The complainant will be provided 60 calendar days from the date of the incident to submit the required information. Failure to do so may be considered good cause for a determination of no merit to investigate.
 - Full cooperation will be required by the parties to assist the investigation.
3. If the complaint has investigative merit, the President and CEO of Silver Key will instruct the Manager of Human Resources and Volunteer Engagement, serving as Title VI Coordinator, to investigate the complaint and report findings within 60 calendar days from receipt of the completed Complaint Form.
 - If more information is needed to resolve the case, Silver Key may contact the complainant by registered mail. The complainant has fourteen calendar days from the date of receipt of the follow-up letter to send the requested information to Silver Key or the investigator assigned to the case.
 - If Silver Key or the investigator is not contacted by the complainant or does not receive the additional information within fourteen business days from the receipt date, Silver Key can decide to administratively close the case.
 - A case can also be administratively closed if the complainant no longer wishes to pursue the case.

- The investigative report will include a written description of the incident, summaries of all persons interviewed, and a finding with recommendations including conciliatory measures where appropriate.
4. If the complaint is delayed for any reason, the Title VI Coordinator will notify all parties and an extension will be requested from the State and/or Federal authorities.
 5. After the investigation of the complaint, the President and CEO of Silver Key will issue one of two letters to the complainant via registered mail: 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 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 fourteen days from the date of the letter or LOF to do so.
 6. If the complainant wishes to appeal the decision, she/he has fourteen days from the date of the letter or LOF to submit an appeal to the Silver Key President and CEO (CEO) at 1625 S. Murray Blvd., Colorado Springs, CO 80916, stating the basis for the reconsideration. The CEO will notify the complainant by registered mail of the decision either to accept or reject the request for reconsideration within ten days. If reconsideration is granted, the CEO will issue a final determination letter upon completion of the review.
 7. If the complainant remains dissatisfied with Silver Key's resolution of the complaint, she/he has the right to file a complaint with:

Colorado Department of Transportation
Division of Transit and Rail
4201 East Arkansas Avenue
Denver, CO 80222
303-757-9766
rob.andresen@state.co.us

or
Federal Transit Administration
Region 8
Attn: Civil Rights Officer
12300 West Dakota Avenue
Suite 310
Lakewood, CO 80228
Phone: 720-963-3300
Fax: 720-963-3333

To submit a Complaint Form, the preferred method is to mail your Complaint Form to our administrative office at 1625 S. Murray Blvd., Colorado Springs, CO 80919 or call 719-884-2300 for other options.

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 St, Suite 13301, Denver, CO 80909.

If information is needed in another language, contact 719-884-2300.

Si necesita información en otro idioma, comuníquese al 719-884-2300.

Appendix D: Complaint/Investigations Table

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

Appendix E: Staff LEP Survey

STAFF LEP SURVEY

Silver Key Senior Services is studying the language assistance needs of its clients so that we can better serve, communicate, and increase access with Limited English Proficient persons. Please complete the following survey and return it to the Human Resources Manager and Title VI Coordinator.

1. What service area do you work in?

Senior Health and Wellness Community Based Services Accounting and Logistics
Administration

2. How often do you come into contact with clients who do not speak English or have trouble understanding you when you speak English to them? (Circle one)

Daily Weekly Monthly Less frequently than monthly

3. Do you have any suggestions to improve Silver Key's ability to serve clients who do not speak English or have trouble understanding you when you speak English to them?

4. What languages do these clients speak? Please list.

5. What languages other than English do you understand or speak?

6. Would you be willing to serve as a translator when needed?

Appendix F: Silver Key Board of Directors Approval of Title VI and LEP Plan

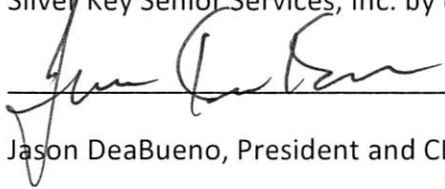
Board Approval: Adoption of Title VI and LEP Plan

Date: January 27, 2021

The Silver Key Board of Directors held an electronic vote on January 27, 2021, through majority vote, the Board approved the adoption of this Title VI and LEP Plan.

The Plan as presented is to comply with Federal Transit Administration (FTA) grant funding requirements. The Board approved Title VI and LEP Plan will be submitted to the Colorado Department of Transportation (CDOT) and the subrecipient per requirements, as Silver Key is a subcontractor under both organizations for FTA grant funds.

The foregoing resolution is hereby passed, approved, and adopted by the Board of Directors of Silver Key Senior Services, Inc. by electronic vote on January 27, 2021.



Jason DeaBueno, President and CEO