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TITLE VI PLAN

May 6, 2016

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INTRODUCTION

As a recipient of Federal Transit Administration 5310 grant funding, Teller Senior Coalition is responsible for the effective execution of nondiscrimination laws and regulations. Title VI of the Civil Rights Act of 1964 and related statutes state that no persons in the United States shall, on the grounds of race, color or national origin be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity, receiving federal financial assistance. Pursuant to this mandate, recipients of federal financial assistance must take affirmative steps to ensure that discrimination, as addressed by Title VI, does not occur in its organization. These activities fall into one or more of the areas listed below:

- Adoption of Assurances, policies and procedures supportive of Title VI requirements.
- Ensure that the level and quality of transportation services are provided without regard to race, color or national origin.
- Identify and address, as appropriate, disproportionately high and adverse human health and environmental effects, including social and economic effects of programs and activities on minority populations and low-income populations.
- Prepare and maintain an Environmental Justice Plan (Executive Order 12898).
- Promote the full and fair participation of all affected populations in transportation decision making.
- Prepare and maintain a Public Participation Plan to ensure adequate public involvement.
- Prevent the denial, reduction, or delay in benefits related to programs and activities that benefit minority populations or low-income populations.
- Ensure meaningful access to programs and activities by persons with limited English proficiency (LEP).
- Prepare and maintain a LEP Plan (Executive Order 13166).
- Implement controls and data collection mechanisms to monitor for any adverse treatment or impacts on any groups.
- Ensure that contracting/procurement opportunities are awarded in a nondiscriminatory manner.
- Ensure that sub recipients, contractors, subcontractors, transferees, successors in interest, and other participants comply with all Title VI requirements.
- Conduct Title VI compliance reviews on Teller Senior Coalition's sub recipients and programs.

Title VI Plan Purpose

The purpose of the Plan is to describe how Teller Senior Coalition will develop and implement the Title VI Program. Its intent is to identify the steps taken and will be

taken to ensure that, for all programs and activities supported by Federal financial assistance, Teller Senior Coalition provides services without excluding or discriminating on the grounds of race, color or national origin, or creating additional barriers to accessing services and activities. Consistent with its commitment to meet FTA regulatory requirements, **Appendix 1** is the signed Certification and Assurances of Compliance with Title VI requirements. Updates to the Plan will be submitted on a triennial basis.

The Plan is available in paper copy and alternative formats upon request. To obtain a copy of the Plan in an alternative format, please call or write to:

Teller Senior Coalition
Attn: Transportation Manager/Title VI Coordinator
750 Highway 24, Suite 100
Woodland Park, CO 80863
(719) 687-3330

The Plan is also available on Teller Senior Coalition Transit website at:
<http://www.tellerseniorcoalition.org>

NOTIFICATION TO PUBLIC OF PROTECTION UNDER TITLE VI

Teller Senior Coalition acknowledges the need to notify the public of their civil rights under Title VI requirements for all its services, projects and activities. Teller Senior Coalition has prepared a poster and sticker on the public rights under Title VI. The poster and sticker contains:

1. A statement that Teller Senior Coalition operates its programs and services without regard to race, color or national origin.
2. A description of the procedures that the public should follow in order to request additional information on Teller Senior Coalition's nondiscrimination obligations.
3. A description of the procedures that the public should follow in order to file a discrimination complaint.

Appendix 2 includes the Title VI notification in English and in Spanish.

Teller Senior Coalition will use various media methods to disseminate the Title VI notification--brochures and poster regarding the public's rights and obligations. The Title VI poster and brochures will be disseminated:

- On Teller Senior Coalition Transit website at:
<http://www.tellerseniorcoalition.org>
- At Teller Senior Coalition office

- At transit stations
- On transit vehicles

PROCEDURES FOR FILING A TITLE VI COMPLAINT

It is the policy of Teller Senior Coalition to employ its best efforts to ensure that all programs, services, activities, and benefits are implemented without discrimination. This section provides information on Teller Senior Coalition procedures for filing complaints alleging discrimination on the basis of race, color or national origin. Any person who believes that he or she, individually, or as a member of any specific class of persons, has been subjected to discrimination on the basis of race, color, national origin or other protected-class interests may file a written complaint with Teller Senior Coalition, the FTA, the U.S.DOT Secretary of Transportation or the U.S. Department of Justice (USDOJ). Further, Teller Senior Coalition prohibits intimidation, coercion, or engagement in other discriminatory conduct against anyone because he or she has filed a complaint to secure their rights as protected by Title VI.

Complaint Procedures

These procedures cover all complaints filed under Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act of 1990, for alleged discrimination in any program or activity administered by Teller Senior Coalition.

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 Teller Senior Coalition may be utilized for resolution. Any individual, group of individuals or entity that believes they have been subjected to discrimination prohibited under Title VI and related statutes may file a complaint.

The following measures will be taken to resolve Title VI complaints:

- (1) A formal complaint must be filed within 180 calendar days of the alleged occurrence. Complaints shall be in writing and signed by the individual or his/her representative, and will include the complainant's name, address and telephone number; name of alleged discriminating official, basis of complaint (race, color, national origin, sex, disability, age), and the date of alleged act(s). A statement detailing the facts and circumstances of the alleged discrimination must accompany all complaints.

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

Teller Senior Coalition
Attn: Transportation Manager/Title VI Coordinator
750 Highway 24, Suite 100
Woodland Park, CO 80863
(719) 687-3330

- (2) In the case where a complainant is unable or incapable of providing a written statement, a verbal complaint of discrimination may be made to Teller Senior Coalition Transportation Manager/Title VI Coordinator. Under these circumstances, the complainant will be interviewed, and the Transportation Manager/Title VI Coordinator will assist the Complainant in converting the verbal allegations to writing.
- (3) When a complaint is received, the Transportation Manager/Title VI Coordinator will provide written acknowledgment to the Complainant, within ten (10) calendar days by registered mail.
- (4) If a complaint is deemed incomplete, additional information will be requested, and the Complainant will be provided 60 calendar days to submit the required information. Failure to do so may be considered good cause for a determination of no investigative merit.
- (5) Within 15 calendar days from receipt of a complete complaint, Teller Senior Coalition will determine its jurisdiction in pursuing the matter and whether the complaint has sufficient merit to warrant investigation. Within five (5) calendar days of this decision, the Transportation Manager/Title VI Coordinator will notify the Complainant and Respondent, by registered mail, informing them of the disposition.
- (6) When Teller Senior Coalition does not have sufficient jurisdiction, the Transportation Manager/Title VI Coordinator will refer the complaint to the appropriate State or Federal agency holding such jurisdiction.
- (7) If the complaint has investigative merit, the Transportation Manager/Title VI Coordinator will fully investigate the complaint. A complete investigation will be conducted, and an investigative report will be submitted to the Executive Director and Board President by the Transportation Manager/Title VI Coordinator within 60 calendar days from receipt of the complaint. The report will include a narrative description of the incident, summaries of all persons interviewed, and a finding with recommendations and conciliatory measures where appropriate. If the investigation is delayed for any reason, the Transportation Manager/Title VI Coordinator will notify the appropriate authorities, and an extension will be requested.

- (8) The Transportation Manager/Title VI Coordinator will issue letters of finding to the Complainant and Respondent within 90 calendar days from receipt of the complaint.
- (9) If the Complainant is dissatisfied with Teller Senior Coalition's resolution of the complaint, he/she has the right to file a complaint with the:

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

A copy of Teller Senior Coalition Transit's Complaint Forms in English and Spanish are included in **Appendix 3**. FTA Complaint procedures can also be found on the FTA web site at: www.fta.dot.gov.

RECORD OF INVESTIGATIONS, COMPLAINTS AND LAWSUITES

Over the past three years, there were no complaints, investigations or lawsuits filed upon Teller Senior Coalition alleging discrimination on the basis of race, color, or national origin. All allegations of Title VI discrimination will be tracked and monitored for compliance with this Plan. The recording of the complaint and or lawsuit will include:

- Date the complaint, investigation or lawsuit was filed.
- Summary of the allegation(s).
- The status of the complaint, investigation or lawsuit.
- Actions taken by Teller Senior Coalition in response to the complaint, investigation or lawsuit findings.

The recording of the complaint, investigation or lawsuit will be provided to FTA in the Triennial report, or upon request.

PROMOTING PUBLIC PARTICIPATION

Public involvement is fundamental and essential in achieving equitable program,

services and activities. Public participation provides for public involvement of all persons, minorities and low-income persons, affected public agencies, employees, the general public, transportation service providers, public transit users and other interested parties of the community affected by transit and transportation plans, programs and projects.

In order to integrate, into community outreach activities, consideration expressed in the DOT Order on Environmental Justice, and the DOT LEP Guidance, Teller Senior Coalition will seek out and consider the viewpoints of minority, low-income, and LEP populations in the course of conducting public outreach and involvement activities. Teller Senior Coalition Transit's public participation strategy shall offer early and continuous opportunities for the public to be involved in the identification of social, economic, and environmental impacts of proposed transit and transportation decisions. Teller Senior Coalition's Public Participation Plan is included as a separate document in **Appendix 4**.

ACCESS TO LEP INDIVIDUALS

Limited English proficient (LEP) individuals are those who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English. In keeping with Title VI requirements, Teller Senior Coalition provides language assistance to ensure that its LEP users have meaningful access to its services, including route information, telephone based customer service, printed materials including public meeting notices, and other customer based services.

Teller Senior Coalition has applied the Four-Factor Framework needs assessment in Section V of the *Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficiency Persons* and prepared a comprehensive LEP Plan that supplements the Title VI Plan, as a separate document in **Appendix 5**.

RACIAL BREAKDOWN OF APPOINTED BOARDS AND COMMITTEES

Teller Senior Coalition utilizes a board of directors, for planning, decision-making, and information dissemination. The Board of Directors is comprised of key stakeholders in Teller County that include area Human Services provider representatives, private industry staff, municipal staff, and retired citizens. **Table 1** summarizes the racial breakdown of the Board of Directors.

Table 1 – TSC Board of Directors

AGENCY	NAME/TITLE	ETHNICITY
Retired	Arnie Sparnins, President	White
Mesa Networks	Lorie Schleicher, Vice President	White
PPCH	Arianne Randolph, Secretary	White
Cripple Creek, City	Melissa Beaty, Treasurer	White
Retired	Jeff Brandt, Member	White
Retired	Gail Gerig, Member	White
Moller Law Group	Bill Moller, Member	White

SUBRECIPIENT COMPLIANCE

Presently, Teller Senior Coalition does not have Federal grant sub grantees, requiring no effort on our part. However, the Transportation Manager/Title VI Coordinator is responsible for evaluating and monitoring compliance with Title VI requirements in all aspects of the agency's consultant contracts process. The Transportation Manager/Title VI Coordinator will:

- Include Title VI language in contracts and Requests for Proposals (RFP) as described below:
 - Ensure the text in Appendix 1 (Title VI Assurance) is included in all agency contracts.
 - Notify all contractors that the text in Appendix E to DOT Title VI Assurance (minus section 6) should be included in all subcontracts.
 - Ensure that Title VI notification is included in all Teller Senior Coalition RFPs.

When/if Teller Senior Coalition enters into sub grantee relationships in the course of our transit operations, we will ensure that the proper documentation and oversight is in place per FTA Circular 4702.B.

ENVIRONMENTAL JUSTICE

Environmental justice is the public policy goal of promoting the fair treatment and meaningful involvement of all people in the decision-making for transportation service changes and projects. Satisfying this goal means ensuring that low-income and minority communities receive an equitable distribution of the benefits of transportation activities without suffering disproportionate adverse impacts.

The complete TSC Environmental Justice Plan is attached as **Appendix 6**.

SERVICE MONITORING

Service Performance Standards

FTA Circular 4702.1B mandates that all operators of fixed route service must incorporate quantifiable performance standards to effectively monitor the equitable distribution of transit resources and performance of the transit system. The following four elements are required by FTA for all operators of fixed route transit to meet Title VI requirements:

- Vehicle load for each mode of transit - this is expressed as the ratio of passengers to the number of available seats. Vehicle load standards for each mode are identified for peak and off-peak times.
- Vehicle headways for fixed route transit – headways are defined as the amount of time between two vehicles traveling in the same direction on a given line or combination of lines. Vehicle headway standards establish a minimum frequency based on variables such as population density or vehicle loads.
- On-time performance (OTP) – is the measure of runs completed on schedule and should be available by mode of transit. OTP is measured relative to origins and destinations, as well as time points along the route.
- Service availability for each mode – is the general measure of distribution of routes within our service area.

In addition to quantifiable performance standards FTA Circular 4702.B requires service providers to develop policies for each of the following performance indicators:

- Distribution of transit amenities by mode – refers to the distribution of items of comfort, convenience, and safety. Policies in the arena should address how the amenities are distributed within a transit system.
- Vehicle assignment for each mode – refers to the manner in which vehicles are placed into service throughout the transit system. Policies can be based on the type of vehicle, age of vehicles or other factors, but must show a pattern of equitable vehicle distribution throughout the system.

Table 2 – TSC Service Standards

MODE	SERVICE STANDARD				
	Vehicle Load Peak	Vehicle Load Off Peak	Headway	On-time-Performance	Service Availability
Demand Response	75%	25%	N/A	90%	90%
Fixed Route	75%	25%	:60	95%	95%

Distribution of Transit Amenities by Mode and Vehicle Assignment

In addition to quantifiable performance standards FTA Circular 4702.B requires service providers to develop policies for each of the following performance indicators:

- Distribution of transit amenities by mode – refers to the distribution of items of comfort, convenience, and safety. Policies in the arena should address how the amenities are distributed within a transit system.
- Vehicle assignment for each mode – refers to the manner in which vehicles are placed into service throughout the transit system. Policies can be based on the type of vehicle, age of vehicles or other factors, but must show a pattern of equitable vehicle distribution throughout the system.

TSC makes every reasonable effort to maintain its adopted distribution of transit amenities by mode and vehicle assignments and reports performance annually. Table 3 provides TSC's distribution of amenities by mode and standards for vehicle assignments.

Table 3 – TSC Distribution of Transit Amenities/Vehicle Assignments

Mode	TRANSIT AMMENITIES				VEHICLE ASSIGNMENT	
	Bus Shelter	Basis for Standard	Bus Bench	Basis for Standard	Vehicle Age	Basis for Standard
Demand Response	N/A	N/A	N/A	N/A	2.5 YRS	Average age of vehicle based on replacement schedule
Fixed Route	1 -3 Shelters per Route	Based on highest number of passenger pickups, right of away availability, and funding	N/A - No benches currently in system	Based on highest number of passenger pickups, right of away availability, and funding	2.5 YRS	Average age of vehicle based on replacement schedule

APPENDIX 1 – CERTIFICATIONS AND ASSURANCES

Colorado Department of Transportation
Division of Transit & Rail



COLORADO
Department of Transportation
Division of Transit & Rail

School Bus Service Certification

As required under Title 49 USC 5323 and 49 CFR part 605, recipients of federal funding are restricted from providing exclusive school bus transportation. There are only three exceptions which, if met, must be approved by the FTA Administrator.

Recipients of 5311 funding that provide fixed route service are allowed to provide school "tripper" service which must meet the following criteria:

- Be open and promoted to the public
- Not carry designations such as "school bus" or "school special."
- Stop at regular bus stops

As a recipient of 5311 funding from the Colorado Department of Transportation, please certify one of the following:

Agency Name: Teller Senior Coalition

We hereby certify that our agency meets the following criteria:

We:

- provide exclusive school bus service with FTA Administrator approval
- operate one or more school "tripper" services
- do not provide any school bus service

Certified By: Lisa Reed, interim executive director

We receive 5310 funding.
Lisa Reed, interim executive director

The Colorado Department of Transportation has reviewed this School Bus Service certification and validates that the agency noted above complies with 49 USC 5323(f) and 49 CFR Part 605

For CDOT: _____ Date: _____

DISCLOSURE OF LOBBYING ACTIVITIES

Complete this form to disclose lobbying activities pursuant to 31 U.S.C. 1352
(See reverse for public burden disclosure.)

Approved by OMB
0348-0046

1. Type of Federal Action: <input checked="" type="checkbox"/> a. contract <input type="checkbox"/> b. grant <input type="checkbox"/> c. cooperative agreement <input type="checkbox"/> d. loan <input type="checkbox"/> e. loan guarantee <input type="checkbox"/> f. loan insurance		2. Status of Federal Action: <input checked="" type="checkbox"/> a. bid/offer/application <input type="checkbox"/> b. initial award <input type="checkbox"/> c. post-award		3. Report Type: <input checked="" type="checkbox"/> a. initial filing <input type="checkbox"/> b. material change For Material Change Only: year _____ quarter _____ date of last report _____	
4. Name and Address of Reporting Entity: <input checked="" type="checkbox"/> Prime <input type="checkbox"/> Subawardee Tier _____, if known: Teller Senior Coalition 740 E Highway 24 P.O. Box 6956 Woodland Park, Colorado 80866 Congressional District, if known: ^{4c}			5. If Reporting Entity in No. 4 is a Subawardee, Enter Name and Address of Prime: Congressional District, if known:		
6. Federal Department/Agency: FTA			7. Federal Program Name/Description: 5310 Operating Rural CFDA Number, if applicable: _____		
8. Federal Action Number, if known:			9. Award Amount, if known: \$ 100,000		
10. a. Name and Address of Lobbying Registrant (if individual, last name, first name, MI): N/A			b. Individuals Performing Services (including address if different from No. 10a) (last name, first name, MI): N/A		
11. Information requested through this form is authorized by title 31 U.S.C. section 1352. This disclosure of lobbying activities is a material representation of fact upon which reliance was placed by the tier above when this transaction was made or entered into. This disclosure is required pursuant to 31 U.S.C. 1352. This information will be available for public inspection. Any person who fails to file the required disclosure shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.			Signature: <u>Lisa Reed</u> Print Name: Lisa Reed Title: Interim Executive Director Telephone No.: 719-687-3330 Date: 01/14/2016		
Federal Use Only:			Authorized for Local Reproduction Standard Form LLL (Rev. 7-97)		

Colorado Department of Transportation
Division of Transit & Rail



COLORADO
Department of Transportation
Division of Transit & Rail

Charter Bus Service Certification

As required under Title 49 USC 5323 and 49 CFR part 604, recipients of federal funding are limited in providing charter bus transportation. Grant partners may not be in competition with private sector charter providers and must report any activity which qualifies as charter bus service.

As a recipient of federal funding from the Colorado Department of Transportation, please certify one of the following:

Agency Name: Teller Senior Coalition

We hereby certify that our agency meets the following criteria:

We:

do not provide any charter service or provide services which qualify under the exemption category

provide charter service under the exception category and report those services and maintain all records as required

Certified By: Lisa Reed, interim Executive Director

The Colorado Department of Transportation has reviewed this Charter Bus Service certification and validates that the agency noted above complies with 49 USC 5323(d) and 49 CFR Part 604

For CDOT: _____ Date: _____

APPENDIX 2 – PUBLIC NOTICE (S)

Teller Senior Coalition

Teller Senior Coalition complies with Title VI of the Civil Rights Act of 1964. The level of quality of transportation service will be provided without regard to race, color, and national origin.

Any person who believes he/she or any specific class of persons is subjected to discrimination prohibited by Title VI may by him/herself or by a representative file a written complaint with Teller Senior Coalition and/or the Federal Transit Administration. All complaints will be properly investigated.

To request additional information on Teller Senior Coalition nondiscrimination obligation contact:

Transportation Manager/Title VI Coordinator
750 Highway 24, Suite 100
Woodland Park, CO 80863
(719) 687-3330

Information in languages other than English will be provided as needed and will be consistent with DOT LEP guidance.

Teller Senior Coalition

Teller Senior Coalition se conforma con Título a VI del Acto Civil de Derechos de 1964. El nivel de calidad de servicio de transporte será proporcionado sin consideración para competir, el color, y origen nacional.

Cualquier persona que cree a él/ella o cualquier clase específica de personas es sujeta a la discriminación prohibida por Título VI puede por él/ella misma o por un representante archivar una queja escrito con la Teller Senior Coalition y/o la Administración Federal de Tránsito. Todas las quejas serán investigadas apropiadamente.

Para solicitar información adicional en la Teller Senior Coalition de contacto de obligación de no discriminación de Teller Senior Coalition:

Transportation Manager/Title VI Coordinator
750 Highway 24, Suite 100
Woodland Park, CO 80863
(719) 687-3330

La información en idiomas de otra manera que inglés será proporcionada como necesitado y será consecuente con guía de PUNTO LEP.

APPENDIX 3 – COMPLAINT FORMS

Title VI Complaint Form

Instructions: If you would like to submit a Title VI complaint to Teller Senior Coalition, please fill out the form below and send it to: Teller Senior Coalition , Attn: Transportation Manager/Title VI Coordinator, 750 Highway 24, Suite 100, Woodland Park, Colorado 80863. For questions or a full copy of Teller Senior Coalition's Title VI policy and complaint procedures call (719) 687-3330.

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:
7. Discrimination because of: <p style="margin-left: 40px;">Race</p> <p style="margin-left: 40px;">National origin</p> <p style="margin-left: 40px;">Color</p>	
8. Explain as briefly and 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.	
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:

In order to facilitate communications between Teller Senior Coalition employees and persons with limited English proficiency, we have included the Title VI Statement, instructions for filing a Title VI complaint, and the complaint in Spanish:

INSTRUCCIONES DE QUEJAS

Queja de Teller Senior Coalition tránsito y Procedimientos de Investigación Estos procedimientos abarcan todas las quejas presentadas en virtud del Título VI del Acta de Derechos Civiles de 1964, la Sección 504 de la Ley de Rehabilitación de 1973, y la Ley de Estadounidenses con Discapacidades de 1990, por presunta discriminación en cualquier programa o actividad administrada por el Teller Senior Coalition tránsito.

Estos procedimientos no niegan el derecho del demandante a presentar denuncias formales con otras agencias estatales o federales o buscar un abogado privado para las quejas que alegan discriminación. Se hará todo lo posible para obtener la pronta resolución de las quejas en el nivel más bajo posible. La opción de la reunión de mediación informal (s) entre las partes afectadas y el Teller Senior Coalition tránsito puede ser utilizada para su resolución. Cualquier persona, grupo de personas o entidad que cree que han sido objeto de discriminación prohibida por el Título VI y los estatutos puede presentar una queja.

Se tomarán las siguientes medidas para resolver las quejas del Título VI:

- (1) Una queja formal debe ser presentada dentro de los 180 días de la supuesta aparición. Las quejas deben ser por escrito y firmado por la persona o su/su representante, e incluirán el nombre del autor, dirección y número de teléfono, el nombre del presunto oficial de discriminación, base de la queja (raza, color, origen nacional, sexo, discapacidad, edad), y la fecha del supuesto acto (s). Una declaración que detalla los hechos y circunstancias de la supuesta discriminación debe acompañar todas las reclamaciones.

El Teller Senior Coalition tránsito recomienda encarecidamente el uso del Teller Senior Coalition tránsito Título VI Forma de Teller Senior Coalition tránsito junta al presentar denuncias oficiales.

El método preferido es el de presentar su queja por escrito utilizando el Teller Senior Coalition tránsito Título VI Forma de Teller Senior Coalition tránsito, y enviarlo a:

Teller Senior Coalition
Attn: Transportation Manager/Title VI Coordinator
750 Highway 24, Suite 100
Woodland Park, CO 80863
(719) 687-3330

- (2) En caso de que el demandante no puede o es incapaz de proporcionar una declaración por escrito, una queja verbal de discriminación puede ser hecha al Title VI Coordinator/Transportation Manager. En estas

circunstancias, el demandante será entrevistado y el Title VI Coordinator/Transportation Manager asistirá al demandante en la conversión de las denuncias verbales a la escritura.

- (3) Cuando se recibe una queja, el Coordinador del Título VI brindará reconocimiento por escrito al demandante, dentro de los diez (10) días calendario por correo certificado.
- (4) Si la reclamación se considera incompleta, se solicitará información adicional y el demandante se proporcionará 60 días naturales para presentar la información requerida. De lo contrario, se puede considerar una buena causa para la determinación de ningún mérito investigativo.
- (5) En el plazo de 15 días naturales desde la recepción de una denuncia completa, el Title VI Coordinator/Transportation Manager determinará su competencia en la búsqueda de la materia y si la que tiene méritos suficientes para justificar una investigación. Dentro de los cinco (5) días calendario a partir de esta decisión, el Title VI Coordinator/Transportation Manager al demandante y al demandado, por correo certificado, informándoles de la disposición.
 - a. Si la decisión no es investigar la denuncia, la notificación se establecerá específicamente la razón de la decisión.
 - b. Si la denuncia se va a investigar, la notificación se indicarán los criterios de competencia del Teller Senior Coalition Transit, informando a las partes que se requiera su total cooperación en la recopilación de información y asistencia al investigador.
- (6) Cuando el Teller Senior Coalition Transit no tiene competencia suficiente, el Title VI Coordinator/Transportation Manager emitirá la denuncia al Estado o agencia federal que tiene dicha jurisdicción.
- (7) Si la que tiene mérito investigativo, el Title VI Coordinator/Transportation Manager de investigar a fondo la denuncia. Se llevará a cabo una investigación completa, y un informe de investigación se presentará al Executive Director y Board President de los 60 días naturales desde la recepción de la queja. El informe incluirá una descripción narrativa de los hechos, los resúmenes de todas las personas entrevistadas, y un resultado de las recomendaciones y medidas de conciliación en su caso. Si la investigación se retrasa por cualquier razón, el Title VI Coordinator/Transportation Manager notificará a las autoridades competentes, y se solicitó una prórroga.
- (8) Title VI Coordinator/Transportation Manager de encontrar a la demandante y al demandado un plazo de 90 días naturales desde la recepción de la queja.

- (9) Si el demandante no está satisfecho con la resolución de la queja del Teller Senior Coalition tránsito, él / ella tiene el derecho de presentar una queja ante la:

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

Procedimientos de reclamación TLC también se pueden encontrar en el sitio web de TLC: www.fta.dot.gov.

Formulario de Quejas del Título VI

Instrucciones: Si usted desea presentar una queja del Título VI de la Teller Senior Coalition transporte, por favor rellene el siguiente formulario y envíelo a: Teller Senior Coalition, la atención de:

Transportation Manager/Title VI Coordinator
750 Highway 24, Suite 100
Woodland Park, CO 80863
(719) 687-3330.

Si tiene preguntas o una copia completa del Título VI de la política Teller Senior Coalition tránsito y procedimientos que llame (719) 687-3330.

1. Nombre (Demandante):		
2. Teléfono:	3. Dirección (calle, no, ciudad, estado, código postal.):	
4. En su caso, nombre de la persona (s) que su puesta mente discriminó:		
5. Situación y cargo de la persona (s), si se conoce:	6. Fecha de los hechos:	
7. La discriminación por motivo de: carerra origennacional color		
8. Explica la forma más breve y clara posible lo que pasó y cómo usted cree que fue discriminado. Indique quiénes tu voín involucrado. Asegúrese de incluir cómo se sienten otras personas fueron tratadas de manera diferente que tú. También, adjunte cualquier material escrito relacionado con su caso.		
9. ¿Por qué cree que ocurrieron los hechos?		
10. ¿Qué o qué formación cree usted que es pertinente para la investigación?		
11. ¿Cómo puede este / estos problema (s) resolverse a su satisfacción?		
12. Por favor, indique a continuación cualquier persona (s) a quienes podemos ponernos en contacto para obtener información adicional para apoyar o aclarar su queja (testigos):		
Nombre:	Dirección:	Teléfono:
13. ¿Ha presentado esta queja con otra agencia federal, estatal o local, o ante cualquier tribunal federal o estatal?		
Sí	No	
En caso afirmativo, marque todo lo que corresponda:		
agencia federal	Corte Federal	Tribunal estatal
agencia local	agencia estatal	
Si se presenta en una agencia y / o de la corte, por favor proporcionar información sobre una persona de contacto en la corte / agencia / donde se presentó la queja.		
Agencia / Corte:	Nombre del Contacto:	Dirección
		Teléfono:
Firma (Demandante):		Fecha de presentación:

APPENDIX 4 - PUBLIC PARTICIPATION PLAN

As Teller Senior Coalition Transit only began receiving federal funding in 2016, we have not yet developed the Public Participation Plan (PPP). Teller Senior Coalition will determine how, when, and how frequently specific public involvement measures should take place, and what specific measures are most appropriate. The PPP will include effective practices on:

1. Coordinating with individuals, institutions, or organizations and implementing community-based public involvement strategies to reach out to members in the affected minority and/or low-income communities.
2. Providing opportunities for public participation through means other than written communication, such as personal interviews or use of audio or video recording devices to capture oral comments.
3. Using locations, facilities, and meeting times that are convenient and accessible to low-income and minority communities.
4. Using different meeting sizes or formats, or varying the type and number of news media used to announce public participation opportunities, so that communications are tailored to the particular community or population.

The Public Participation Survey will be in English and Spanish and enables Teller Senior Coalition to collect data to identify residents and communities impacted by Federal financial assisted projects or activities.

APPENDIX 5 – LIMITED ENGLISH PROFICIENCY PLAN



LIMITED ENGLISH PROFICIENCY (LEP) PLAN

January 15, 2016

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INTRODUCTION

This Limited English Proficiency (LEP) Plan, for Teller Senior Coalition 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 conduct 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 Teller Senior Coalition 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.

POLICY

It is the policy of Teller Senior Coalition to ensure that our programs and activities, normally provided in English, are accessible to Limited English Proficiency (LEP) persons and thus does not discriminate on the basis of national origin in violation of Title VI prohibition against national origin discrimination. Teller Senior Coalition will, to the 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. It also requires that we provide a list of resources that would be needed to respond to LEP outreach. Each of these elements is addressed in this section.

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 Teller County on Language Spoken at Home by ability to speak and communicate in English.

TABLE 1 - Individuals Speaking English "Less than Very Well"

DATA CATEGORY	TELLER COUNTY	
	Number	Percent
Total Population (5 years old & older)	22,256	100%
LANGUAGE SPOKEN AT HOME		
English Only	20,744	93.2%
Spanish	768	3.5%
Population Speaking English "Less than very well"	230	1.0%
Other Indo-European	266	1.0%
Population Speaking English "Less than very well"	28	0.1%
Asian and Pacific Islander	184	0.8%
Population Speaking English "Less than very well"	86	0.4%
Other Languages	8	0.0%
Population Speaking English "Less than very well"	0	0.0%

Source: 2010 US Census

The total Teller County population that had difficulty with speaking English (Population Speaking English "Less than very well") is less estimated at 344 people, or less than 2% of the population within the Teller Senior Coalition's service area has difficulty with English.

The Census data represents a relatively low need and level of response to individuals in our service area. Persons who do have difficulty with English are primarily Spanish speaking, though there is also a small population of Asian and Pacific Islanders in Teller County who have difficulty speaking English.

Visitors

There are tens of thousands of annual visitors from all over the world who come to Teller County. Though we do not maintain demographic information on our visitor base, it is assumed that a large number of visitors will have some difficulty with English. Teller Senior Coalition will work with the Woodland Park Chamber of Commerce to identify recurring language issues and work to develop outreach solutions.

Nature, Frequency and Importance of LEP Contact

In addition to Census data, Teller Senior Coalition gathered internal data from the transit program to establish usage and assistance levels for current passengers. Transit officials confirmed that there are no current clients who have difficulty communicating in English.

Resources to Reach LEP Population

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

- Technology that may include language translation resources, real time translation capabilities, and other technology as it becomes identified.
- Reasonable Business Practices including 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.
- The engagement of organizations and activists with an interest in supporting LEP populations.

Summary

Though the need for outreach is relatively small, there can be occasional interaction with persons whose principal language is Spanish. We have based our LEP Plan efforts on the Spanish-speaking population initially, while maintaining a commitment to evaluate and update the plan depending on changes in circumstances and population demographics.

CURRENT LEP EFFORTS

To address these current markets, Teller Senior Coalition has initiated the following efforts:

- We are in the process of translating and publishing a limited number of brochures and other materials in Spanish. These brochures will be distributed via drivers and mailed on request.
- Teller Senior Coalition has obtained twenty (20) copies of CDOT's "Basic Spanish for Transit Employees" and distributes them to drivers and customer service staff, as appropriate;
- Teller Senior Coalition anticipates adopting this document in January 2016.

Given the scale of our current need for LEP services, Teller Senior Coalition believes that this plan adequately addresses the need as well as positions our organization for an expansion of LEP outreach efforts, should that need be established.

PLANS FOR THE FUTURE LEP EFFORTS

The current plan is sufficient for present conditions and services. We have expanded our LEP efforts to look toward the future in monitoring and updating the Plan.

Maintenance of Effort: Identifying LEP Persons Who Need Language Assistance

As part of our ongoing commitment to bridging communications gaps with persons who have limited English proficiency, Teller Senior Coalition 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;
- Provide opportunities for LEP participation at public meetings, through advertising and conduct of meetings, as appropriate.

Monitoring and Updating Plan

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

- Review the performance of the LEP Plan against selected benchmarks; making adjustments, as needed;
- Pay particular attention to demographic changes in our area that have the potential to affect LEP strategies;
- Review LEP-related complaints annually 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 Teller Senior Coalition website.

APPENDIX 6 - ENVIRONMENTAL JUSTICE PLAN

Introduction and Purpose

Environmental justice is a public policy goal of promoting the fair treatment and meaningful involvement of all people, particularly minority and low-income populations, in the decision-making for transportation. Satisfying this goal means ensuring that low-income and minority communities receive an equitable distribution of the benefits of transportation activities without suffering disproportionate adverse impacts.

Teller Senior Coalition plays an essential role in advancing the economy, safety, and quality of life in Teller County. Transportation services and facilities provide mobility to the city's senior and disabled residents. The purpose of Teller Senior Coalition's Environmental Justice Plan is to:

- To avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority and low-income populations.
- To ensure the full and fair participation by all potentially affected communities in the transportation decision-making process.
- To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations.

Teller Senior Coalition Environmental Justice Plan is in place to ensure that minority and low-income populations are not disproportionately affected by transit system operations and/or related facilities construction. Teller Senior Coalition Transit Environmental Justice Plan will be updated triennially and incorporates the requirements and guidance of the following:

- Executive Order 12898 – 1994
- Memorandum of Understanding on Environmental Justice and Executive Order 12898 – August 2011
- DOT Order 5610.2(a) – May 2012
- FTA Circular 4703.1

Environmental Justice Analysis Process

Teller Senior Coalition applies the environmental justice analysis process to major service changes (Modifying, adding, or deleting 25% or more of service hours,

miles, or bus stops on a route or of the system) and transit facility construction projects. Teller Senior Coalition Environmental Justice Process includes the following activities:

- Analyze demographic data
- Gain meaningful public involvement
- Determine adverse effects and benefits
- Mitigate impacts as is feasible

Analysis of Demographic Data

Teller Senior Coalition maintains demographic data that identify the location of minority and low-income persons within our service area. When considering the potential impact of routes changes or facilities construction on these populations, Teller Senior Coalition draws on this data to establish their location and to what extent the project may affect them.

Meaningful Public Involvement

Teller Senior Coalition utilizes our Public Participation Plan when we make major service changes resulting from planning efforts and/or unforeseen events, and transit facilities construction projects. Our public involvement process takes into account the participation of environmental justice populations and how to encourage it. Minimally, our efforts consider the following:

- Potentially affected community members have an appropriate opportunity to participate in decisions about a proposed activity that will affect their environment and/or health;
- The public's contribution can influence our decision;
- The concerns of all participants involved will be considered in the decision-making process; and
- Decision-makers seek out and facilitate the involvement of those potentially affected.

Adverse Impacts/Effects and Benefits

Teller Senior Coalition acknowledges that disproportionately high and adverse effects, not population size, are the basis for environmental justice. A very small minority or low-income population in the project, study, or planning area does not eliminate the possibility of a disproportionately high and adverse effect on these populations.

Adverse impacts include elements such as increased pollution, increased noise pollution, increased vehicle traffic, and reduced service levels; while benefits might include increased service levels, positive economic impacts, and area enhancements resulting from increased service or facilities.

If the Environmental Justice analysis process determines that disproportionately high effects or impacts are predominantly borne by an environmental justice population, or appreciably more severe than suffered by the non-environmental justice population, Teller Senior Coalition will consider mitigation measures.

Mitigation Actions

When Teller Senior Coalition has considered the potential disparate or negative impact on environmental justice populations and has determined that mitigation efforts are warranted, we may undertake the following measures:

1. Avoid the action that may cause a disproportionately high effect on the environmental justice population. Actions could include locating an alternate location, redesigning or reconfiguring a facility or site, or a revision of service change options.
2. Minimize or mitigate the action that may cause a disproportionately high effect on the environmental justice population. Measures may include limitations during construction, sound barriers, speed bumps, and consideration during operations.

Though Teller Senior Coalition makes every effort to mitigate disparate impacts when warranted, financial constraints, geographical conditions, real estate location, and other factors may impact the extent of our mitigation efforts. Measures, if undertaken, will be based on the totality of circumstances (negative impacts, benefits, constraints), reflect community input, and be unique to the project.