



## Title VI Civil Rights Plan October 2019

### Policy Statement:

The Arc of Greater Boone County, as a recipient of Federal Transit Administration (FTA) grant dollars either directly from FTO or through the Indiana Department of Transportation (INDOT) will comply with the Title VI of the Civil Rights Act of 1964 (42 U.S.C.2000d) and the U.S. Department of Transportation implementing regulations.

### Title VI Plan Elements:

The Arc of Greater Boone County's Title VI plan includes the following elements:

1. Evidence of Policy Approval
2. Notice to the Public
3. Complaint Procedure
4. Complaint Form
5. List of transit related Title VI Investigations, Complaints and Lawsuits
6. Public Participation Plan
7. Language Assistance plan
8. Minority Representation Table and Description

Note: Additional materials will be attached, if required.

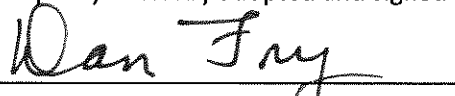
### 1. POLICY APPROVAL

Adopted on: October 21, 2019

Adopted By: The Board of Directors of The Arc of Greater Boone County

Resolution shall be maintained in Board Meeting Minutes.

This policy is hereby adopted and signed by:

  
\_\_\_\_\_  
Dan Fry, Board President



**2. PUBLIC NOTICE OF RIGHTS UNDER TITLE VI OF THE CIVIL RIGHTS ACT OF 1964**

The Arc of Greater Boone County operates its programs and services without regard to race, color, or national origin in accordance to Title VI of the Civil Rights Act of 1964. Any person who believes that he or she has been aggrieved by any unlawful discriminator practice under Title VI may file a complaint with The Arc of Greater Boone County.

For more information on The Arc of Greater Boone County's civil rights plan and the procedures to follow the complaint, contact the Executive Director at The Arc of Greater Boone County at 765-482-6815 or email [info@thearcgbc.org](mailto:info@thearcgbc.org). You may also visit their office at 900 West Main Street, Lebanon, IN 46052

A complainant may file a complaint directly with the Federal Transit administration by filing a complaint at the address below:

Federal Transit Administration  
Office of Civil Rights  
Attention: Title VI Program Coordinator  
East Building, 5<sup>th</sup> Floor – TRC  
1200 New Jersey Avenue, SE  
Washington, DC 20590

If information is needed in another language or alternate format, contact The Arc of Greater Boone County at 765-482-6815 or email [info@thearcgbc.org](mailto:info@thearcgbc.org) Subject: Title VI.

The Arc of Greater Boone County's Notice to the Public is posted in the following locations:

- Agency Website: [www.thearcgbc.org](http://www.thearcgbc.org)
- Agency Administrative Office at 900 West Main Street, Lebanon IN



### 3. COMPLAINT PROCEDURE

The Arc of Greater Boone County Title VI Complaint Procedure is made available in the following locations:

- Agency Website at [www.thearcgbc.org](http://www.thearcgbc.org)
- Physical Copy in the agency administrative office at 900 W Main Street, Lebanon IN

Any person who believes that she or he has been discriminated against on the basis of race, color or national origin by The Arc of Greater Boone County may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form. The Arc of Greater Boone County investigates complaints received no more than 180 days after the alleged incident. The Arc of Greater Boone County will process complaints that are complete.

Within 60 days of the receipt of the complain The Arc of Greater Boone County shall conduct an investigation of the allegation based on the information provided and issue a written report of its findings to the complainant. The complainant will receive one of the following notification:

- A closure letter summarizing the allegations, stating no finding of a Title VI violation and notification of case closure.
- A letter of finding (LOF) summarizing the allegations and interviews regarding the alleged incident, and explanation of 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 5 business days after the date of the closure letter or LOF to do so.

A person may also file a complaint directly with the Federal Transit Administration, at FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590



4. COMPLAINT FORM

**Section 1**

Full Legal Name: \_\_\_\_\_

Mailing Address: \_\_\_\_\_

Email Address: \_\_\_\_\_

Phone (home): \_\_\_\_\_ Phone (work): \_\_\_\_\_

Accessible Format Requirements:  Large Print  TDD  Audio Tape  Other \_\_\_\_\_

**Section 2**

Are you filing this complaint on your own behalf?  Yes  No

If you answered "yes", continue to Section 3

If you answered "no", provide the name and your relationship to the person for whom you are

complaining: Full Legal Name \_\_\_\_\_ Relationship \_\_\_\_\_

Please explain why you have filed for the third party: \_\_\_\_\_

\_\_\_\_\_  
Please confirm that you have obtained permission of the aggrieved party if you are filing on behalf of a third party.  Yes  No

**Section 3**

I believe the discrimination I experiences was based on (check all that apply)

Race  Color  National Origin

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 or attach additional pages.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_



**Section IV**

Have you previously filed a Title VI complaint with this agency? \_\_\_ Yes \_\_\_ No

**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 you answered "yes" check all that apply:

\_\_\_ Federal Agency: \_\_\_\_\_ Federal Court: \_\_\_\_\_  
\_\_\_ State Agency: \_\_\_\_\_ State Court: \_\_\_\_\_  
\_\_\_ Local Agency: \_\_\_\_\_

Provide information about a contact person at the agency/court where the complaint was filed:

Contact Person: \_\_\_\_\_ Title: \_\_\_\_\_  
Agency/Court Name: \_\_\_\_\_  
Address: \_\_\_\_\_  
Phone: \_\_\_\_\_

**Section VI**

Provide information about the agency your complaint is against

Agency Name: \_\_\_\_\_  
Contact Person: \_\_\_\_\_ Title: \_\_\_\_\_  
Phone: \_\_\_\_\_

You may attach any written materials or other information that you think is relevant to your complaint.

Signature and date required below:

\_\_\_\_\_  
Signature Date

Please submit this form in person at the address below, or mail this form to:  
Executive Director  
The Arc of Greater Boone County  
900 West Main Street  
Lebanon, IN 46052



**5. TRANSIT RELATED INVESTIGATIONS**

List of Transit Related Title VI Investigations, Complaints and Lawsuits

Check One:

There have been NO investigations, complaints and/or lawsuits filed against us during the report period. *as of 10/31/2019*

There have been investigations, complaints and/or lawsuits filed against us. See list below.  
Additional information is attached

	Date	Summary (include basis of complaint: race, color or national origin)	Status	Action(s) Taken
<b>Investigations</b>				
1.				
2.				
<b>Lawsuits</b>				
1.				
2.				
<b>Complaints</b>				
1.				
2.				



## 6. PUBLIC PARTICIPATION PLAN

### Strategies and Desired Outcomes

To promote inclusive public participation, The Arc of Greater Boone County will use its resources available to employ the following strategies as appropriate:

- Provide for early, frequent and continuous engagement by the public
- Select accessible and varied meeting locations and times
- Employ different meeting sizes and formats
- Use social media in addition to other resources to gain public involvement

### Documented Public Outreach

The direct public outreach and involvement activities conducted by The Arc of Greater Boone County are summarized in the table below. Efforts include meetings, surveys, focus groups, etc.

Event Date	The Arc of Greater Boone County Staffer(s)	Event	Date Publicized and Communication Method (public notice, posters, social media)	Outreach Method (meeting, focus group, survey)	Notes
10/21/2019	Pam Verburg, ED	Board mtg.	Email on 10/18/19	meeting	Plan review & approval
10/31/19	Pam Verburg, ED	update Website	10/31/19	posting	Plan posted to website



## 7. LANGUAGE ASSISTANCE PLAN

The Arc of Greater Boone County identifies needs of persons served at various states of the service plan. Those needs are met by matching them with appropriate service. With regard to individuals with cognitive or intellectual and developmental disabilities, language barriers are identified at time of intake and a qualified assistant is found to assist.

### LEP Safe Harbor

Factor 1: Review of data for Boone County reveals that the safe harbor threshold of individuals who are Limited English Proficient is not reached either in total numbers of individuals (more than 1000) or in percent of population (5% or more) for any language.

Factor 2: Individuals who meet the LEP criteria rarely seek services from The Arc of Greater Boone County. In the past 12 months, 0 persons who have limited English Proficiency has sought services.

Factor 3: Language is important for the social and independence building activities that are part of the Programming for The Arc of Greater Boone County.

Factor 4: Resources and costs have not been identified at this time. Should an individual in need of services need LEP assistance, a primary staff for that individual would be recruited. That individual providing services would have wage funding through the individual's services budget.

### Description of language assistance services

Language assistance services would be individually developed for each program participant in need. Determinations and plans would be developed as part of the Individualized Support Planning process required by the service funders.

Individuals would be informed of language assistance programs during the intake process.

The plan is monitored and updated on at least a quarterly basis and documented in the individual's program records.

Employees would be sought who are proficient in the language needed. Training for non-language speakers would include training on translation supports available which may include the use of assistive technology for persons with disabilities.





**8. MINORITY REPRESENTATION**

The table below depicts The Arc of Greater Boone County’s two committees and councils related to transit: the grantee’s Board of Directors and the local Boone County Transportation Advisory Council

Body	Caucasian	Hispanic	African American	Asian American	Native American
Boone County Population	90.1%	3.2%	2%	3.1%	.3%
Arc Clients	84%	1.4%	13.9%	.7%	0
Board of Directors	92%	0%	8%	0%	0%
Transportation Advisory Council	100%	0%	0%	0%	0%

- *Census Bureau Reporting*

**Efforts to Encourage Minority Participation**

The Arc of Greater Boone County understands diverse representation on committees and boards results in sound policy reflective of its entire population. As such, The Arc of Greater Boone County encourages participation of all its citizens. The Arc of Greater Boone County continually makes efforts to encourage and promote diversity. To encourage participation on boards and committees, The Arc of Greater Boone County will continue to reach out to community, ethnic and faith-based organizations to connect with all populations.

**Anti-Discrimination Notice**

It is unlawful for The Arc of Greater Boone County to fail or refuse to provide services, access to services or activities, or otherwise discriminate against an individual because of an individual’s race, color, religion, sexual preference, national origin, disability, or veteran status.

The Arc of Greater Boone County invites board and committee members to voluntarily self-identify their race/ethnicity in order for us to comply with FTA Title VI regulations. This information will be used according to the provisions of applicable federal and state laws, executive orders and regulations, including those requiring the information to be summarized and reported to the federal government for civil rights enforcement purposes.



## Minority Representation Data Collection Form

Date:

Dear Member:

As The Arc of Greater Boone County is a recipient of federal funds, we are required under Title VI of the Civil Rights Statute to ascertain the race/ethnic makeup of boards and committees.

Data from this section is used for statistical and reporting purposes. The information may be subject to disclosure under federal or state law or rule.

### **Race/Ethnicity – Self Identification (Optional)**

If you choose to self-identify, please mark the one box describing the race/ethnicity category with which you primarily identify:

Asian or Pacific Islander: All persons having origins of the people of the Far East, Southeast Asia, the Indian Sub-Continent, or the Pacific Islands. This area includes, for example, China, Japan, Korea, The Philippine Islands, and Samoa.

Black and/or African American (not of Hispanic origin): All persons having origins in any of the Black racial groups of Africa.

Hispanic: All persons of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture or origin, regardless of race.

American Indian or Alaskan Native: All persons having origins in any of the original peoples of North America, and who maintain cultural identification through tribal affiliation or community recognition.

Caucasian (not of Hispanic origin): All persons having origins of any of the original peoples of Europe, North Africa or the Middle East.