

***Federal Transit Administration  
Title VI Program***

**Adult Day Center of Richmond, Inc.**

**March 8, 2023**

(Plan expires 3 years from date approved by the board)

## **Title VI Plan Table of Contents**

The **Adult Day Center of Richmond** Title VI plan includes the following elements:

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**Section 1: Title VI Plan Approval & Compliance Requirements**

Title VI Plan  
Adopted on: March 8, 2023

Adopted by: Adult Day Center of Richmond, Board of  
Directors

Signature(s): Marilyn M. Hooser  
Board Chair

Approval:

## Annual Certifications and Assurances

In accordance with 49 CFR Section 21.7(a), every application for financial assistance from FTA must be accompanied by an assurance that the applicant will carry out the program in compliance with Title VI regulations. This requirement shall be fulfilled when the applicant/recipient submits its annual certifications and assurances. Primary recipients will collect Title VI assurances from sub-recipients prior to passing through FTA funds.

Adult Day Center of Richmond will remain in compliance with this requirement by annual submission of certifications and assurances as required by INDOT.

The date of last submission of these certifications and assurances (at the time of this Plan's approval) is: September 15, 2020

## Title VI Plan Revision Log

<b>Date</b> Month/day/year	<b>Section Revised</b>	<b>Summary of Revisions</b>
03/05/2014	Title VI Plan Adopted	
09/2017	Title VI Plan Revised	Census and other variable information made current according to latest data. Any other changes recommended by INDOT.
09/2020	Title VI Plan Revised	Census and other variable information made current according to latest data. Any other changes recommended by INDOT.
03/2023		

## **Section 2: Title VI Policy Statement**

### **Policy Statement**

The **Adult Day Center of Richmond**, operating demand response transit provider, as a recipient of Federal Transit Administration (FTA) grant dollars either directly from FTA 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), the U.S. Department of Transportation implementing regulations, FTA Circular 4702.1B, and INDOT Public Transportation requirements as specified in Master Grant Agreement, and State Management Plan. The **Adult Day Center of Richmond** operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act.

### **Section 3: Notice to the Public**

#### **Title VI Notice to the Public**

The **Adult Day Center of Richmond's** Notice to the Public is as follows:

### **Notifying the Public of Rights Under Title VI**

## **Insert Agency Name**

- The Adult Day Center of Richmond operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the Adult Day Center of Richmond .
- For more information on the Adult Day Center of Richmond's civil rights program, the procedures to file a complaint, or to file a complaint, please contact **Johanna Smith, Executive Director** at **765-966-0852**, (TTY **800-XXX-XXX**); email [info@adcofrichmond.com](mailto:info@adcofrichmond.com); or visit our administrative office at 2727 East Main Street, Richmond, IN 47374. For more information, visit [www.adcofrichmond.com](http://www.adcofrichmond.com)
- For transportation-related Title VI matters, a complaint may also be filed directly with the:

Indiana Department of Transportation, Attn: Kimberly Ray, INDOT Title VI Program Manager, 100 North Senate Avenue, Indianapolis, IN 46204; 317-232-0924; [kiray@indot.in.gov](mailto:kiray@indot.in.gov)

Federal Transit Administration, Office of Civil Rights, Attention: Complaint Team, East Building, 5<sup>th</sup> Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.

- If information is needed in another language, contact 765-966-0852.

The **Adult Day Center of Richmond** Notice to the Public is posted in the public areas of the office and inside the transit vehicles.

1. 2727 East Main Street, Richmond, IN 47374
2. Location
3. Location

#### **Section 4: Title VI Complaint Procedure**

The **Adult Day Center of Richmond's** Title VI Complaint Procedure is made available in the following locations:

- Agency website, if available: **www.adcofrichmond.com**
  - Hard copy in the central office
  - Agency Title VI Plan
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Any individual, group of individuals or entity that believes they have been discriminated against on the basis of race, color, or national origin by the **Adult Day Center of Richmond** may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form.

Any individual having filed a complaint or participated in the investigation of a complaint shall not be subjected to any form of intimidation or retaliation. Individuals who have cause to think that they have been subjected to intimidation or retaliation can file a complaint of retaliation following the same procedure for filing a discrimination complaint.

A complaint must be filed with the **Adult Day Center of Richmond Executive Director** no later than 180 days after the following:

1. The date of the alleged act of discrimination; or
2. The date when the person(s) became aware of the alleged discrimination; or
3. Where there has been a continuing course of conduct, the date on which that conduct was discontinued of the latest instance of the conduct.

Once the complaint is received, the **Adult Day Center of Richmond Executive Director** will review it to determine if our office has jurisdiction. A copy of each Title VI complaint received will be forwarded to the Indiana Department of Transportation within ten (10) calendar days of receipt. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office.

The **Adult Day Center of Richmond** has 45 days to investigate the complaint. If more information is needed to resolve the case, the **Adult Day Center of Richmond** may contact the complainant requesting further information. The complainant has **10** business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within **10** business days, the **Adult Day Center of Richmond** can administratively close the case.

After the investigator reviews the complaint, the agency will issue one of two (2) letters to the complainant: a closure letter or a letter of finding (LOF).

- ✓ A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed.
- ✓ A letter of finding (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 it must direct the appeal to the agency initially. The complainant has **7** days after the date of the closure letter or the letter of finding to do so. If there is

outstanding concern, the appeal may be directed to the state DOT or FTA. The appeal process information will be included in the letter.

A person may also file a complaint directly with the: Indiana Department of Transportation, Attn: Kimberly Ray, INDOT Title VI Program Manager, 100 North Senate Avenue, Indianapolis, IN 46204; 317-232-0924; [kiray@indot.in.gov](mailto:kiray@indot.in.gov)

Or

Federal Transit Administration, Office of Civil Rights, Attention: Complaint Team, East Building, 5<sup>th</sup> Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.

If information is needed in another language, then contact **(765)966-0852**.



## Section 5: Title VI Complaint Form

The Adult Day Center of Richmond Title VI Complaint Procedure is made available in the following locations:

- Agency website, if available: [www.adcofrichmond.com](http://www.adcofrichmond.com)
- Hard copy in the central office
- Agency Title VI Plan

<b>Section I:</b>				
Name:				
Address:				
Telephone (Home):			Telephone (Work):	
Email Address:				
Accessible Requirements?	Format	Large Print		Audio Tape
		TDD		Other
<b>Section II:</b>				
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
<b>Section III:</b>				
I believe the discrimination I experienced was based on (check all that apply):				
<input type="checkbox"/> Race		<input type="checkbox"/> Color		<input type="checkbox"/> 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.				

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**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.

Signature and date required below

\_\_\_\_\_

Signature

\_\_\_\_\_

Date

If information is needed in another language, contact 765-966-0852.

Please submit this form to:

**Adult Day Center of Richmond**

**Executive Director  
2727 East Main Street  
Richmond, IN 47374  
765-966-0852  
info@adcofrichmond.com**

**Section 6: List of Transit Related Title VI Investigations, Complaints and Lawsuits**

The **Adult Day Center of Richmond** maintains a list or log of all Title VI investigations, complaints and lawsuits, pertaining to its transit-related activities.

**Check One:**

  X   There have been no investigations, complaint and/or lawsuits filed against us since the last plan submission.

       There have been investigations, complaints and/or lawsuits filed against us. *See list below. Attach additional information as needed.*

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

## **Section 7: Public Participation Plan**

### **Strategies and Desired Outcomes**

To promote inclusive public participation, the **Adult Day Center of Richmond** will employ the following strategies, as appropriate (make these determinations based on a demographic analysis of the population(s) affected, type of plan, program and/or service under consideration, and the resources available):

- ✓ Provide for early, frequent and continuous engagement by the public
- ✓ Select accessible meeting locations and times
- ✓ Employ different meeting sizes and formats
- ✓ Use social media in addition to other resources as a way to gain public involvement
- ✓ Use radio, television or newspaper ads on stations and in publications that serve LEP populations. Outreach to LEP populations may also include audio programming available on podcasts.
- ✓ Expand traditional outreach methods by visiting ethnic stores/markets and restaurants, community centers, libraries, faith-based institutions, local festivals, etc.

### **Public Outreach Activities**

The public outreach and involvement activities conducted by the **Adult Day Center of Richmond** since the last Title VI Program submission are summarized in the table below.

Specific Public Participation activities are listed in the table below:

<b>Event Date</b>	<b>Insert Agency Name</b> Staffer(s) or Department	<b>Activity</b>	<b>Communication Method</b> (Public notice, posters, social media)	<b>Notes</b>
05/2021	ADC of Richmond	Sponsor for LifeStream Health Fair	Social Media, T-Shirt Advertisement	
05/2022	Same as Above	Same as Above	Same as Above	
09/2022	ADC of Richmond	TV Commercial	Local Cable Station WCTV in Richmond	
03/2020	ADC of Richmond	Social Media Commercial	Social Media	
09/2022	Indianan Association of Adult Day Services	Annual Conference	On-line Conference	

## **Section 8: Language Assistance Plan**

### ***Plan Components***

As a recipient of federal US DOT funding, the **Adult Day Center of Richmond** is required to take reasonable steps to ensure meaningful access to our programs and activities by limited-English proficient (LEP) persons.

Limited English Proficient (LEP) refers to persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. This includes those who have reported to the U.S. Census that they speak English less than very well, not well, or not at all.

The **Adult Day Center of Richmond's** Language Assistance Plan includes the following elements:

Item #1: The results of the *Four Factor Analysis*, including a description of the LEP population(s), served.

Item #2: A description of how language assistance services are provided by language

Item #3: A description of how LEP persons are informed of the availability of language assistance service

Item #4: A description of how the language assistance plan is monitored and updated

Item #5: A description of how employees are trained to provide language assistance to LEP persons

### ***Four Factor Analysis Methodology***

To determine if an individual is entitled to language assistance and what specific services are appropriate, the **Adult Day Center of Richmond** has conducted a *Four Factor Analysis* of the following areas: 1) Limited-English Proficient (LEP) Speaker Demography, 2) Contact Frequency, 3) Importance of Service, and 4) Resources and Costs.

**Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient.** In addition to the number or proportion of LEP persons served, the **Adult Day Center of Richmond** will identify:

- (a) How LEP persons interact with the recipient's agency;
- (b) Identification of LEP communities, and assessing the number or proportion of LEP persons from each language group to determine the appropriate language services for each language;
- (c) The literacy skills of LEP populations in their native languages, in order to determine whether translation of documents will be an effective practice; and
- (d) Whether LEP persons are underserved by the recipient due to language barriers.

**Factor 2: The frequency with which LEP persons come into contact with the program:** Identifies and assesses the frequency **Adult Day Center of Richmond’s** staff comes into contact with LEP persons. Examples of contact could include:

- (a) Use of bus and rail service;
- (b) Purchase of tickets through vending machines, outlets, websites, and over the phone;
- (c) Participation in public meetings;
- (d) Customer service interactions;
- (e) Ridership surveys;
- (f) Operator surveys.

**Factor 3: The nature and importance of the program, activity, or service provided by the program to people’s lives.** Generally speaking, the more important the program, the more frequent the contact and the likelihood that language services will be needed.

**Factor 4: The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach.** Resource and cost issues can often be reduced by technological advances, reasonable business practices, and the sharing of language assistance materials and services among and between recipients, advocacy groups, LEP populations and Federal agencies. Large entities and those entities serving a significant number of LEP persons should ensure that their resource limitations are well substantiated before using this factor as a reason to limit language assistance.

Item #1 – Results of the Four Factor Analysis *(including a description of the LEP population(s) served)*

**Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered.**

Of the 62,719 residents in the **Adult Day Center of Richmond** service area, 1060 residents describe themselves as speaking English less than “very well”. People of Hispanic descent are the primary LEP persons likely to utilize Adult Day Center of Richmond services. For the Adult Day Center of Richmond service area, the latest U.S. Census Bureau data shows that among the area’s population 1.7% speak English “*less than very well.*” **For these groups** who speak English “less than very well”, 51.9% speak Spanish.

Wayne County/Richmond – Languages Spoke at Home

	Total Number of People	Percent of Population that Speaks Language other than English	Total Population of County/City/Service Area
Speak Language other than English	3,120	5.0%	62,719
Speak English Less than Very Well	1,060	1.7%	62,719
Spanish	1,470	2.3%	62,719
Speak Spanish, Speak English less than Very Well	550	1.7%	62,719
German/West Germanic	657	1.0%	62,719
Speak German, Speak English Less than Very Well	297	0.5%	62,719

**Factor 2: The frequency with which LEP persons come into contact with the program.**

Adult Day Center of Richmond assessed the frequency with which staff and drivers have, or could have, contact with LEP persons. Adult Day Center of Richmond provides approximately 4,278 passenger trips per year. If an individual has speech limitations, the dispatcher or driver will work with the Indiana Department of Transportation, if needed, to ensure the individual receives access to the transit services.

**Factor 3: The nature and importance of the program, activity, or service provided by the program to people’s lives.**

All of Adult Day Center of Richmond’s programs are important; however, those related to safety, public transit, nondiscrimination and public involvement are among the most important. The Adult Day Center of Richmond is committed to providing meaningful access and will provide written translation for any of its documents, when reasonable, effective and with the available resources. In other cases, the Adult Day Center of Richmond will strive to provide alternative but meaningfully accessibility. Moreover, the Adult Day Center of Richmond continually evaluates its programs, services, and activities to ensure that persons who may be LEP are always provided with meaningful access. The Title VI policy, complaint form, and LEP policy are available in insert languages(s) upon request.

**Factor 4: The resources available for LEP outreach, as well as the costs associated with that outreach.**

The Adult Day Center of Richmond makes every effort to make its programs, services, and activities, accessible to LEP individuals. The Adult Day Center of Richmond will use available resources, both internal and external to accommodate reasonable requests for translations.

**Item # 2 – Description of how Language Assistance Services are Provided, by Language**

The Adult Day Center of Richmond has identified, developed, and uses the following:

Adult Day Care of Richmond, Inc. is also prepared to utilize additional resources if the need arises for further language assistance efforts. First, Amigos Richmond Latino Center offers translators, classes, and many other opportunities for Spanish speaking individuals in the community. We are able to contact this organization and seek help or refer individuals to them if needed. Also, Indiana 211 is a way to connect with translators if necessary. A three-way phone call can be completed between the operator, translator, and individual needing help in order to connect them with the resources available. Finally, our organization is able to connect with students through Earlham College who would be interested in providing translation services on an as-needed basis.

**Item # 3 – Description of how LEP Persons are Informed of the Availability of Language Assistance Service**

In order to ensure that LEP individuals are aware of Adult Day Center of Richmond language assistance measures, Adult Day Center of Richmond provides the following:



- Title VI Program including the Language Assistance Plan is made available on website, if applicable, and hard copy in central office.
- For our purposes, the need for Adult Day Center of Richmond to provide language assistance measures would be determined during the intake/admission process and would be implemented at that time.
- Much of our clientele is referred to our organization through LifeStream Area Agency on Aging. Our organization and Lifestream work closely with potential participants and their families to ensure that all of their needs for services are provided.
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Item # 4 – Description of how the Language Assistance Plan is Monitored and Updated
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Adult Day Center of Richmond will continue to update the LEP plan as required by U.S. DOT. At a minimum, the Title VI Plan will continue to be reviewed and updated every three (3) years in conjunction with the Title VI submission and use data from the U.S. Decennial Census or the American Community Survey as available, or when it is clear that the concentrations of LEP individuals are present in the Adult Day Center of Richmond service area.

Updates will continue to include the following:

- The number of documented LEP person contacts encountered annually.
- How the needs of LEP persons have been addressed.
- Determination of the current LEP population in the service area.
- Determination as to whether the need for translation services has changed.
- Determine whether local language assistance programs have been effective and sufficient to meet the need.
- Determine whether Adult Day Center of Richmond’s financial resources are sufficient to fund language assistance resources needed.
- Determine whether Adult Day Center of Richmond has fully complied with the goals of this LEP Plan.
- Determine whether complaints have been received concerning Insert Agency Name’s failure to meet the needs of LEP individuals

Item # 5 - Description of how Employees are Trained to Provide Language Assistance to LEP Persons
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The following training will continue to be provided to Adult Day Center of Richmond’s staff:

- Information on the Adult Day Center of Richmond’s Title VI Procedures and LEP responsibilities.
- Description of language assistance services offered to the public.
- Documentation of language assistance requests.  
web-based interpreter services (over the phone interpretation provider).
- How to handle a potential Title VI / LEP complaint.

Limited English Proficient (LEP) Resource Materials:

LEP Policy

**Adult Day Center of Richmond** shall provide for communication for limited English proficient riders to ensure them equal opportunity to benefit from services. Family members or friends of limited English proficient riders will not be used as translators unless specifically requested by that individual.

Arrangements have been made with Amigos Richmond Latino Center and Earlham College to obtain translators. The agency will also utilize web-based translator programs if available.

**If you need help with English, please call 765-966-0852.**

Si usted necesita ayuda con el inglés, por favor llame **765-966-0852**.

## “I Speak” Language Identification Card

Mark this Box if you speak...	Language Identification Chart	Language
	Mark this box if you read or speak English	English
	Marque esta casilla si lee o habla español	Spanish
	Kos lub voj no yog koj paub twm thiab hais lus Hmoob	Hmong
	如果说中国在方框内打勾	Chinese
	Xin ñaùnh daáu vaøo oâ naøy neáu quyù vò bieát ñoïc vaø noùi ñöôïc Vieät Ngöô.	Vietnamese
	당신이한국어말할경우이 상자를표시	Korean
	Markahan itong kuwadrado kung kayo ay marunong magbasa o magsalita ng Tagalog.	Tagalog
	Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen	German
	Отметить этот флажок, если вы говорите по-русски	Russian
	Означите ову кућицу ако говорите српски	Serbian
	आप हिंदी बोलते हैं तो इस बक्से को चिह्नित करें	Hindi
	پر نشان لگائیں تو اس باکس بولتے ہیں اردو اگر آپ	Urdu

**Note:** For additional languages visit the US Census Bureau website <http://www.lep.gov/ISpeakCards2004.pdf>

## Log of LEP Encounters

Date	Time	Language Spoken By Individual <i>(if available)</i>	Name and Phone Number of Individual <i>(if available)</i>	Service Requested	Follow Up Required	Staff Member Providing Assistance	Notes

Date	Time	Language Spoken By Individual (if available)	Name and Phone Number of Individual (if available)	Service Requested	Follow Up Required	Staff Member Providing Assistance	Notes

**Section 9: Minority Representation Information**

Recipients that have **transit-related**, non-elected planning boards, advisory councils or committees, or similar committees, the membership of which is selected by the recipient, must provide a table depicting the racial breakdown of the membership of those committees, and a description of efforts made to encourage the participation of minorities on such committees.

**\*Guidance:** Elected transit-related board, committee, or council, do not need to complete the table below, and write in section B that there are no non-elected transit-related boards, committees, or councils.

**A. Minority Representation Table**

**Table Depicting Membership of Board, Committees, Councils, Broken Down by Race**

Body	Caucasian	Hispanic	African American	Asian American	Native American	Two or More Races

*Note: insert the number of people and % of total board membership*

**B. Efforts to Encourage Minority Participation**

*To encourage participation on its boards, committees, and councils, the Adult Day Center of Richmond will make every effort to encourage minority participation on the boards. Detail any further efforts below.*

## **Section 10: Providing Assistance to and Monitoring Subrecipients**

1. Does agency provide funding to subrecipients?

No, the agency does not have subrecipients.

Yes. If yes, list the subrecipient names: (list other agency names here)

Insert Agency Name monitors subrecipients using the following process:

1. Insert Agency Name uses the following process for ensuring all subrecipients are complying with the general reporting requirements of FTA Circular 4702.1B: (document the process here)
2. Insert Agency Name collects Title VI programs from the subrecipients listed above and reviews programs for compliance by (list the process here)

## **Section 11: Title VI Equity Analysis for Facility Acquisition**

Title 49 CFR, Appendix C, Section (3)(iv) requires “the location of projects requiring land acquisition and the displacement of persons from their residences and business may not be determined on the basis of race, color, or national origin.” For purposes of this requirement, “facilities” does not include bus shelters, as they are considered transit amenities. It also does not include transit stations, power substations, or any other project evaluated by the National Environmental Policy Act (NEPA) process. Facilities included in the provision include, but are not limited to, storage facilities, maintenance facilities, operations centers, etc. Has the agency built a facility? (check a response below)

No, the agency has not built a facility.

Yes, the agency has built a facility and completed a Title VI equity analysis to compare the equity impacts of various siting alternatives, and the analysis must occur before the selection of the preferred site. (Include at the end of the Title VI plan a copy of the Title VI equity analysis.)

## **Section 12: Fixed Route Transit Providers Service Standards and Policies**

*FTA Circular 4702.1B, Chapter III, Paragraph 10: All fixed route transit providers shall set service standards and policies for each specific fixed route mode of service they provide.*

Insert Agency Name:

is a fixed route transit provider

is **not** a fixed route transit provider

*All Fixed Route Transit Providers must submit:*

