



Well-being as we age

## TRANSPORTATION ASSISTANT PROGRAM (TAP) Title VI Policy & Program

### Mission:

Homage Senior Services has adopted a policy of non-discrimination in all programs, services and employment. No one shall be excluded on the basis of race, color, national origin, sex, sexual orientation, religion, age, marital status, veteran and military status or disability unless required by the eligibility guidelines for services. Inclusiveness is a core value that drives the organization's mission of service and advocacy on behalf of older adults and individuals with disabilities.

### Title VI Plan Approval

I hereby acknowledge the receipt of the Homage Senior Services Title VI Implementation Plan on 3/28/2019. I have reviewed and approve the Plan. I am committed to ensuring that no person is excluded from participation in, or denied the benefits of Homage Senior Services' transportation services on the basis of race, color, or national origin, as protected by Title VI according to FTA Circular 4702.1B, Title VI requirements and guidelines for Federal Transit Administration sub-recipients.




Signature of Authorizing Official      DATE  
 Julie Bogue-Garza,  
 Board Vice-President

### Title VI Policy Statement

**Title VI Notice to the Public**

Homage Senior Services is committed to ensuring that no person shall, on the grounds of race, color, national origin, as provided by Title VI of the Civil Rights Act of 1964 and the Civil Rights Restoration Act of 1987 (PL 100.259), be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity, whether

those programs and activities are federally funded or not. If you believe you have been subjected to discrimination under Title VI, you may file a complaint.

For more information on the Homage Senior Services' civil rights program, and the procedures to file a complaint, contact 425.423.8517 or call the Senior Services main office number at 425.290.1247; email [Insert Agency Email Address]; or visit [Insert Agency Office Location]. For more information, visit [Insert Agency Website].

A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590

If additional information is needed in another language, contact 425.355.1112 for assistance.

The Title VI Notice is also published on our website ([www.homage.org](http://www.homage.org)), posted in our building in the front lobby and by our employee lunchroom, and listed in our printed brochures and applications.

**Membership of Non-Elected Committees: Transportation Advisory Council (TAC)**

The TAC members are users of the local para transit services in our county. These include, but are not limited to, Community Transit DART, Everett Para Transit, King County Metro Access, Island Transit, Skagit Transit, and private providers. Homage posts an open invitation to join the TAC and it is passed through the current members to the users of the aforementioned transit service providers. Homage continues to extend invitations to join the TAC to all communities in our county.

*Table 1: Membership on Non-Elected Committees*

<b>Body</b>	<b>White, Non-Hispanic</b>	<b>Hispanic</b>	<b>Black, Non-Hispanic</b>	<b>Asian, Non-Hispanic</b>	<b>American Indian/Alaska Native</b>	<b>Pacific Islander, Non-Hispanic</b>
Snohomish County Population	74%	11%	3%	11%	1%	1%
Transportation Advisory Committee	100%	0%	0%	0%	0%	0%

**Title VI Complaint Procedures**

Any individual may exercise their right to file a complaint with Homage Senior Services if that person believes they have been subjected to unequal treatment or discrimination in the receipt of benefits or services. If information is needed in another language or you need assistance completing the forms, contact 425.423.8517 or call the Homage Senior Services main office number at 425.355.1112.

Homage Senior Services investigates complaints received no more than 180 days after the alleged incident. Homage Senior Services will process complaints that are complete.

### **Compliant Reporting Procedures:**

1. Instructions for filing a complaint and a complaint form are available on Homage Senior Services' website and at 5026 196<sup>th</sup> St SW, Lynnwood, WA 98036. A copy of Homage's Title VI Complaint Form is also attached as APPENDIX A. The TAP buses also have signs posted on the buses that provide a number for comments or complaints.
2. A complaint may be accepted through a phone call, written letter or fax. A Complaint Form with the information on it must then be completed and signed by the receiver. Complainants have up to 180 days to file a complaint.
3. Complaint Forms will request the following information to assist in the review of the complaint:
  - Vehicle number and/or route number
  - Driver's name
  - Description of the incident, including date, time, and location
  - Complainant's name and contact information so that you can follow-up with the complainant
  - Nature of discrimination (i.e. race, religion, age, national origin, sexual orientation, etc.)
4. If a complaint is filed alleging discrimination it will be investigated by the TAP Supervisor or designee within 30 days or less. Once the investigation has been conducted and decision has been determined, a written response will be mailed to the complainant.
5. If the complainant is not satisfied with the outcome of the complaint, they have the right appeal the decision in writing to the Transportation Director. The Transportation Director will further investigate the matter and respond within 30 days or less.
6. If the complainant is still not satisfied with the outcome of the complaint, they have the right appeal the decision in writing to the Chief Executive Officer (CEO). The CEO will further investigate the matter and respond within 30 days or less.
7. A person may also file a complaint or lawsuit, at any time, with one of the following organizations:

Organization Name and Address

Washington State Department of Transportation Public Transportation Division Attn: Title VI Coordinator P O Box 47387 Olympia, WA 98504-47387	Federal Transit Administration Attn: Title VI Program Coordinator East Building, 5 <sup>th</sup> Floor – TCR 1200 New Jersey Ave, SE Washington, DC 20590	U.S. Department of Justice Civil Rights Division Coordination and Review Section - NWB 950 Pennsylvania Avenue, NW Washington, DC 20530
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**Complaint Tracking:**

Complaints will be tracked and maintained with the following information:

- Type of complaint, investigation, or lawsuit
- Date of complaint, investigation, or lawsuit
- A summary of the allegation(s)
- The status of the complaint, investigation, or lawsuit
- Actions taken in response to the complaint, investigation, or lawsuit

All information will be tracked until the complaint, investigation, or lawsuit has been closed. The records will then be stored according to state and federal record retention requirements. Tracked information will be reported to WSDOT as the grantor of the funds as required in the WSDOT “Guide to Managing your Public Transportation Grants”.

**List of Title VI Complaints**

Homage Senior Services maintains a list of any of the following that allege discrimination on the basis of race, color, or national origin:

- Active investigations conducted by FTA and entities other than FTA;
- Lawsuits; and
- Complaints naming the recipient.

There has been no civil rights compliance review conducted of Homage Senior Services in the last three (3) years.

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Thomas M. Dietz  
Director of Transportation  
Homage Senior Services

DATE:

**Analysis of Construction Projects**

In June of 2018, Homage purchased a building located in Lynnwood, WA. This was a purchase and remodel, so there were no displaced residents or negative impact in the community as the building was used for retail business for over 50 years prior.

## Public Participation Plan

### Language Assistance Plan for Persons with Limited English Proficiency

#### Assessment of Language Needs and Resources

The need and resources for LEP language assistance were determined through a four-factor analysis as recommended by FTA guidance.

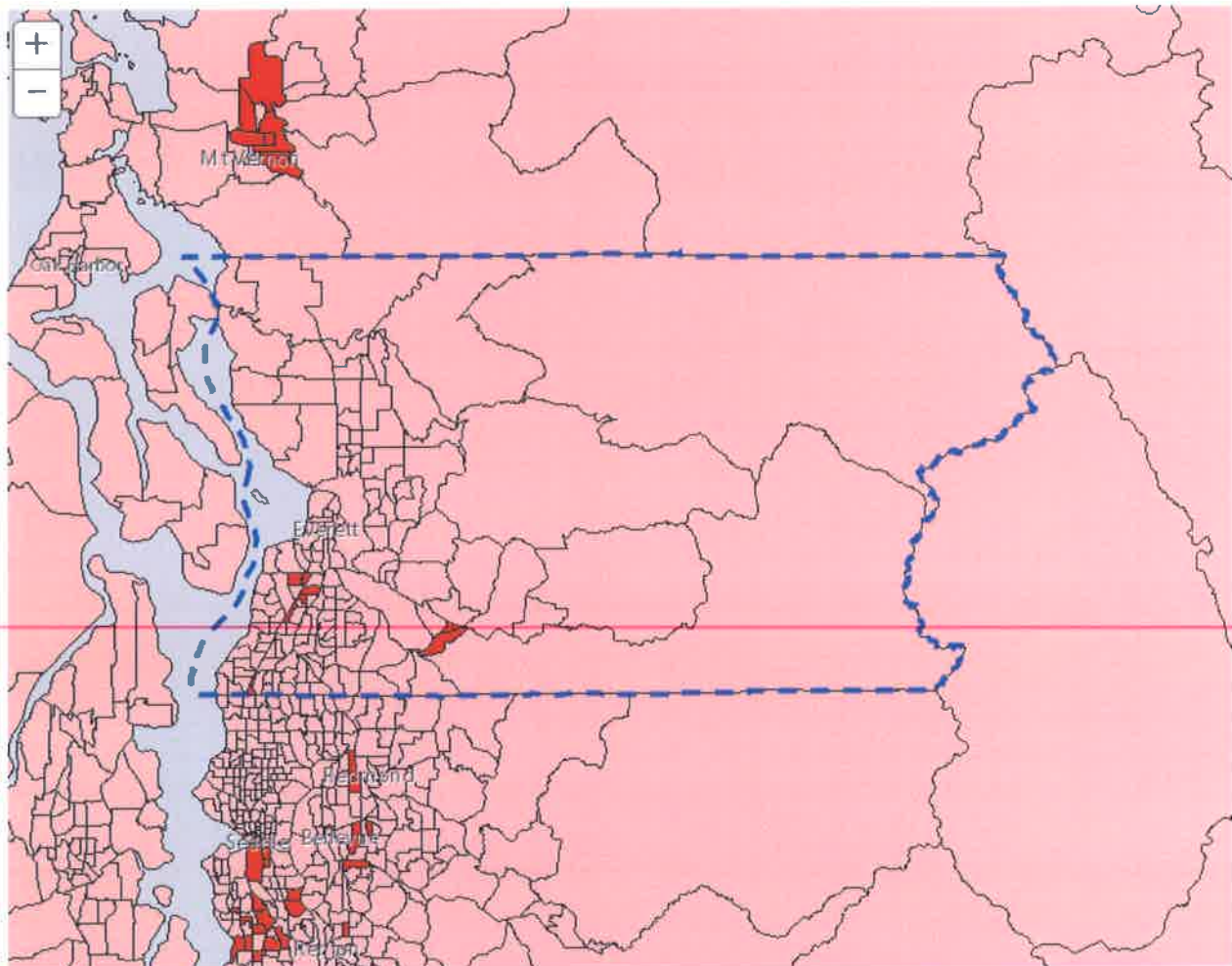
**Factor No. 1:** The number or proportion of LEP persons in the service area.

Data from the U.S. Census Bureau’s American Community Survey (ACS) were obtained through WSDOT’s [ALPACA Tool](#) for Homage Senior Services’ service area (see Map 1). The agency’s service area includes a total of 24,289 or 3.2% persons with Limited English Proficiency (those persons who indicated that they spoke English “not well,” and “not at all”).

*Table 2: Limited English Proficiency*

<b>RACE</b>	<b>Number</b>	<b>Percent</b>
<b>Total population</b>	<b>713,335</b>	<b>100.0%</b>
One Race	680,613	95.4%
White	559,011	78.4%
Black or African American	18,168	2.5%
American Indian and Alaska Native	9,793	1.4%
Asian	63,385	8.9%
Asian Indian	7,363	1.0%
Chinese	8,189	1.1%
Filipino	12,722	1.8%
Japanese	3,186	0.4%
Korean	11,870	1.7%
Vietnamese	9,790	1.4%
Other Asian [1]	10,265	1.4%
Native Hawaiian and Other Pacific Islander	3,135	0.4%
Native Hawaiian	708	0.1%
Guamanian or Chamorro	557	0.1%
Samoaan	324	0.0%
Other Pacific Islander [2]	1,546	0.2%
Some Other Race	27,121	3.8%
Two or More Races	32,722	4.6%
White; American Indian and Alaska Native [3]	6,714	0.9%

White; Asian [3]	10,025	1.4%
White; Black or African American [3]	5,126	0.7%
White; Some Other Race [3]	3,193	0.4%



Language	Count	%
Spanish	686,300	96.58%
Indo / European	8,930	1.26%
Asian / Pacific Island	10,069	1.42%
Other	1,206	0.17%

Race	Count	%
White	591,763	78.00%
Black	20,511	2.70%
American Indian	7,368	0.97%
Asian	73,386	9.67%
N.Hi / Pac. Isl.	3,661	0.48%
Other	19,518	2.57%

Age	Count	%
Under 5	48,060	6.33%
5-17	127,761	16.84%
18-64	491,187	64.74%
65-84	80,395	10.60%
85+	11,246	1.48%

Status	Count	%
Poverty (Federal)	69,695	9.31%
Non-poverty	678,670	90.69%

Group	Count	%
Male Vet.	48,470	8.37%
Male Non-Vet.	238,868	41.25%
Female Vet.	4,236	0.73%
Female Non-Vet.	287,564	49.65%

Type	Count	%
Hearing Disabled	26,464	15.91%
Visual Disabled	13,761	8.27%
Cognitive Disabled	35,955	21.62%
Ambulatory Disabled	43,521	26.16%
Self Care Disabled	16,270	9.78%
Independent Living Disabled	30,370	18.26%

According to information from the 2011-2015 American Community Survey, the top languages spoken by residents in Snohomish County that are five years and older that speak English less than "very well" are:

- Spanish
- Korean
- Vietnamese
- Chinese
- Russian
- Tagalog

**Factor No. 2.** The frequency with which LEP individuals come into contact with the service.

Homage Senior Services reviewed the relevant benefits, services, and information provided by the agency and determined the extent to which LEP persons have encountered these functions through [one or more of] the following channels (by frequency and order of contact):

- Contact with transit vehicle operators;
- Contact with the agency's ADA complementary para-transit system (including applying for eligibility, making reservations, and communicating with drivers).
- Contact with TAP Manager;
- Calls to Aging & Disabilities Resource Network telephone line;
- Visits to the agency's headquarters;
- Access to the agency's website;
- Ridership surveys;
- Attendance at community meetings or public hearings hosted by [Insert Agency Name].

**Factor No. 3:** The nature and importance of service provided by Homage Senior Services.

Homage Senior Services provides the following programs, activities and services:

- Food & Nutrition – Meals-on-Wheels, Senior Dining, Congregate Meal Sites
- Mental Health & Wellness – Depression Screening, Senior Peer Counseling, Foster Grandparents, Chronic Disease Self-Management, Care Coordination
- Home Repair – Home Modifications, Minor Home Repair
- Social Services – Aging & Disability Resources, Family Care Giver, Senior Companion, SHIBA, & Multicultural Outreach & Services
- Transportation – Dial-A-Ride, Transportation Assistance Program, Adult Day Health

Based on past experience serving and communicating with LEP persons and interviews with community agencies, [as well as questionnaires or direct consultations with LEP persons (if applicable, e.g. through focus groups or individual interviews facilitated/interpreted by a community agency)], we learned that the following services/routes/programs are currently of particular importance LEP persons in the community.

- Ethnic Meal Site Activities
- Adult Day Health program activities
- Medical Trips (i.e. Kidney Dialysis, Doctor's appointments)

The following are the most critical services provided by Homage Senior Services for all customers, including LEP persons.

- Emergency evacuation procedures;
- Public and private transportation services, including reduced fare application process;
- ADA paratransit services, including eligibility certification process;
- Home delivered meal and nutrition services;
- Home modification and repair services;
- Mental Health and Wellness services;
- Other Social Services (i.e. SHIBA, Counseling, etc.);
- Services targeted at low income persons.

**Factor No. 4.** The resources available to the recipient of the federal funds to assure meaningful access to the service by LEP persons.

The following language assistance measures are currently being provided by Homage Senior Services.

- In-house language capabilities via staff translators or the language telephone services
- [Language identification flashcards](#) for certain services where applicable
- Partner organizations or programs through regional partnerships

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### **Access to services for persons with limited English proficiency (LEP):**

Senior Services mission is to make all services accessible to everyone. Our current programs are designed and funded to serve LEP persons. Senior Services annually reviews Snohomish County's census data and works with the Snohomish County's Long Term Care and Aging Division to identify minorities and LEP persons. Senior Services currently serves above and beyond the county's demographics. In our multi-cultural events, Homage engages with different populations where English is their second language, see the table above for included languages. These events occur weekly and through the outreach coordinators, Homage is able to bridge the communication gap for these ethnic groups a minimum of one day per week. The staff are well aware of the use of our language line. When a client needs translation assistance they are guided to use the language in order to communicate effectively in their primary language.

Homage Senior Services has a bi-lingual staff in approximately six different languages that translate, interpret and provide services to the community through our Multi-Cultural Services (see above).

Homage Senior Services provides a significant impact to the community; partnering with numerous local organizations, educational systems, government, religious organizations and local business to best serve the community. Many of our clients participate on advisory boards or focus groups to assist us in evaluating the service of our programs.



Appendix A

Title VI Complaint Form

<b>Section I:</b>				
Name:				
Address:				
Telephone (Home):			Telephone (Work):	
Electronic Mail Address:				
Accessible Format Requirements?	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.				
<b>Section IV:</b>				
Have you previously filed a Title VI complaint with this agency?			Yes	No
<b>Section V:</b>				

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:

Court/Agency:

Address:

Telephone Number:

**Section VI:**

Please provide the name of the agency complaint is against.

Agency Name:

Contact Person:

Title:

Telephone Number:

**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 yes, check all that apply:

Federal Agency: \_\_\_\_\_

Federal Court \_\_\_\_\_

State Court \_\_\_\_\_

State Agency \_\_\_\_\_

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 is required below.

Signature

Date

Please submit this form in person at the address below, or mail this form to: City of USA Title  
VI Coordinator  
1234 Center Street  
City of USA, State 11111