



Title VI Plan

Teller Senior Coalition

January 23, 2019

I. Non-Discrimination Policy Statement

It is the policy of Teller Senior Coalition that no person shall on the grounds of race, color, national origin, sex, disability, or age, be excluded from participation in, be denied the benefits of, or be subjected to discrimination in any operation of Teller Senior Coalition as provided by Title VI of the Civil Rights Act of 1964 and related statutes.

This policy applies to all operations of Teller Senior Coalition, including its contractors and anyone who acts on behalf of Teller Senior Coalition.

Prohibited discrimination may be intentional or unintentional. Seemingly neutral acts that have disparate impacts on individuals of a protected group and lack a substantial legitimate justification are a form of prohibited discrimination. Harassment and retaliation are also prohibited forms of discrimination.

Examples of prohibited types of discrimination based on race, color, national origin, sex, disability, or age include: Denial to an individual any service, financial aid, or other benefit; Distinctions in the quality, quantity, or manner in which a benefit is provided; Segregation or separate treatment; Restriction in the enjoyment of any advantages, privileges, or other benefits provided; and Discrimination in employment.

Title VI compliance is a condition of receipt of federal funds. The Title VI Coordinator is authorized to ensure compliance with this policy, Title VI of the Civil Rights Act of 1964, 42 U.S.C § 2000d and related statutes, and the requirements of 23 Code of Federal Regulation (CFR) pt. 200 and 49 CFR pt. 21.

Kathy Lowry, Interim Executive Director

Date

II. Organization, Staffing, and Structure

Teller Senior Coalition Executive Director is ultimately responsible for assuring full compliance with the provisions of Title VI of the Civil Rights Act of 1964 and related statutes and has directed that non-discrimination is required of all agency employees, contractors, and agents pursuant to 23 CFR Part 200 and 49 CFR Part 21.

Teller Senior Coalition has created the position of Title VI Coordinator to perform the duties of the Title VI Coordinator and ensure implementation of agency's Title VI program. Teller Senior Coalition's Title VI Coordinator is the Executive Director.

The Title VI Coordinator is responsible for:

- Submitting a Title VI plan and annual reports on the agency's behalf;
- Developing procedures for the prompt processing and disposition of complaints;
- Investigating complaints, compiling a complaint log, and reporting to CDOT.
- Developing procedures for the collection and analysis of statistical data.
- Developing a program to conduct Title VI reviews of program areas;
- Conducting annual Title VI assessments of pertinent program areas;
- Developing Title VI information for dissemination;
- Establishing procedures for resolving deficiency status and reducing to writing the remedial action agreed to be necessary.

Teller Senior Coalition staff is educated regarding the Title VI program during staff meetings, newsletters and training programs.

III. Title VI Complaint Procedures

Discrimination Complaint Procedure for Teller Senior Coalition

Federal law prohibits discrimination on the basis of race, color, national origin, age, sex, or disability in any Teller Senior Coalition program or activity. This prohibition applies to all branches of Teller Senior Coalition, its contractors, consultants, and anyone else who acts on behalf of Teller Senior Coalition.

Federal law requires that Teller Senior Coalition investigate, track, and report discrimination complaints. Complaints must be filed in writing and will be investigated within sixty days of submission. If you need assistance to file your complaint or need interpretation services, please contact our Title VI Coordinator.

Who is eligible to file a complaint?

Anyone who believes they have been excluded from participation in, denied the benefits of, or otherwise subjected to discrimination under any Teller Senior Coalition program or activity because of their race, color, national origin, age, sex, or disability may file a complaint.

Discrimination includes lack of access, harassment, retaliation and disparate impacts from a program or activity. Harassment includes a wide range of abusive and humiliating verbal or physical behaviors. Retaliation includes intimidating, threatening, coercing, or engaging in other discriminatory conduct against anyone because they filed a complaint or otherwise participated in a discrimination investigation.

How do you file a complaint?

Complaints must be filed in writing within 180 days from the last date of the alleged discrimination. However, contact Teller Senior Coalition's Title VI Coordinator if you believe your complaint may fall outside this deadline.

Reasonable efforts will be made to assist persons with disabilities, non-English speakers, and others unable to file a written complaint. For assistance in filing a complaint, please contact Teller Senior Coalition's Title VI Coordinator.

Complaints may be submitted via mail, email, fax or in person to:

Teller Senior Coalition
Title VI Coordinator
11115 W. US Hwy 24, Unit D
P.O. Box 845
Divide, CO 80814
719-687-3330

Complaints may also be filed directly with the following agencies:

Colorado Department of Transportation
Civil Rights & Business Resource Center
4201 East Arkansas Ave., Room 150
Denver, CO 80222
dot_civilrights@state.co.us
Phone: (800) 925-3427
Fax: (303) 952-7088
dot_civilrights@state.co.us

Federal Highway Administration, Colorado Division
12300 West Dakota Avenue, Suite 180
Lakewood, Colorado 80228
Phone: (720) 963-3000
Fax: (720) 963-3001

What happens after a complaint is filed?

Title VI complaints must be investigated within sixty days. Investigating a complaint includes interviewing all parties involved and key witnesses. The investigator may also request relevant information such as books, records, electronic information, and other sources of information from all involved parties. You may specify if there is a particular individual or individuals that you feel should not investigate your complaint due to conflict of interest or other reasons.

In some cases, complaints will be forwarded to either the Colorado Department of Transportation or the Federal Highway Administration for investigation. If your complaint is forwarded to one of these agencies, you will be provided the name and contact information of the employee handling your complaint.

Federal law prohibits retaliation against individuals because they have filed a discrimination complaint or otherwise participated in a discrimination investigation. Any alleged retaliation should be reported in writing to the investigator.

All allegations of Title VI discrimination will be tracked and monitored for compliance. This tracking will include:

- Date
- Summary of the allegations
- Status of the allegation
- Actions taken by Teller Senior Coalition in response to the allegation

Where did the discrimination occur?

Dates and times discrimination occurred?

Were there any other witnesses to the discrimination?

Name	Organization/Title	Work Telephone	Home Telephone

How would you like to see this situation resolved?

Have you filed your complaint, grievance, or lawsuit with any other agency or court?

Who _____ When _____
Status (pending, resolved, etc.) _____ Result, if known _____
Complaint number, if known _____

Do you have an attorney in this matter?

Name _____ Phone _____
Address _____ City _____ Zip _____

Signed _____ Date _____

V. Environmental Justice

Teller Senior Coalition will meaningfully engage all sectors of the public, including low-income and minority populations. Teller Senior Coalition will be guided by the following:

- Goal of promoting the fair treatment and meaningful involvement of all people in the decision-making for transportation service changes and projects;
- Ensuring that low-income and minority communities receive an equitable distribution of the benefits of services and activities without suffering disproportionate adverse impact.

Teller Senior Coalition maintains demographic data that identifies the location of minority and low-income persons within our service area.

VI. Public Participation

Teller Senior Coalition coordinates with individuals and organizations to implement community-based public involvement strategies to reach out to members in minority and/or low-income communities. Teller Senior Coalition provides communication via our website, brochures and newsletter.

VII. Notice of Rights

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
Title VI Coordinator
11115 W. US Hwy 24, Unit D
P.O. Box 845
Divide, CO 80814
719-687-3330

The Plan is also available on Teller Senior Coalition Transit website at:

<http://www.tellerseniorcoalition.org>

FTA Complaint procedures can also be found on the FTA web site at: <http://www.fta.dot.gov>

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 will use various methods to disseminate the Title VI notification regarding the public's rights and obligations. The Title VI information will be disseminated:

- On Teller Senior Coalition Transit website at: <http://www.tellerseniorcoalition.org>
- At the Teller Senior Coalition office
- On transit vehicles
- Distributed via the client guide

VIII. Limited English Proficiency (LEP) Plan

The LEP plan ensures that programs and activities provided by Teller Senior Coalition, normally provided in English, are accessible to Limited English Proficiency (LEP) persons and thus do not discriminate on the basis of national origin in violation of the Title VI prohibition against national origin discrimination. Appropriate alternative non-English formats for persons with LEP to access information and services provided, if requested. TSC will reference the Federal Government's online LEP resource (www.lep.gov) for guidance and support. We will also utilize <https://www.babelfish.com> when indicated. Total LEP present for Teller County is 1.05%. Teller Senior Coalition will document requests for language assistance and measures taken to assist LEP persons.

IX. Disadvantaged Business Enterprise (DBE)

Teller Senior Coalition transportation will rely on the CDOT Disadvantaged Business Enterprise program to develop required goals as well as certify and maintain a Directory of DBE firms. Every effort will be made to utilize services/goods available from DBE certified businesses. Teller Senior Coalition transportation will report contracting activity to the Department semi-annually.



Your Rights Against Discrimination under Title VI of the Civil Rights Act of 1964

Teller Senior Coalition operates its programs and services without regard to race, color, national origin, sex, age, and disability. Anyone who believes they have been excluded from participation in, denied the benefits of, or otherwise subjected to discrimination under any Teller Senior Coalition program or activity because of their race, color, national origin, age, sex, or disability may file a discrimination complaint with Teller Senior Coalition, Colorado Department of Transportation or the Federal Highway Administration, Colorado Division.

To file a Title VI discrimination complaint, contact:

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