



Tooele County Aging Services

Title VI Plan

Non-Discrimination in the Federal Transit Program

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Title VI Policy

Tooele County Aging Services

The Agency affirms:

1. Title VI of the Civil Rights Act of 1964 prohibits discrimination in federally assisted programs. Title VI was amended by the Civil Rights Restoration Act of 1987 (P.L. 100-259), effective March 22, 1988, which added Section 606, expanding the definition of the terms “programs or activities” to include all of the operations of an educational institution, governmental entity, or private employer that receives federal funds if any one operation receives federal funds.
2. Tooele County Aging Services is a government entity. It is the policy of Tooele County Aging Services to ensure compliance with Title VI of the Civil Rights Act of 1964 and all related statutes or regulations in all programs and activities so administered.
3. The Tooele County Aging Services Title VI Coordinator is granted the authority to administer and monitor the Title VI Plan as promulgated under Title VI of the Civil Rights Act of 1964 and any subsequent legislation. The Title VI Coordinator will provide assistance as needed.
4. Tooele County Aging Services will take all steps to ensure that no person shall, on the grounds of race, color, or national origin, be excluded from participation in, or be denied the benefits of, or be subjected to discrimination under any program or activity of the Agency.
5. The Agency recognizes the need for annual Title VI training for Agency personnel.

Sherrie Ahlstrom
Tooele County Health & Aging Services
Aging Director

Date

Jeff Coombs
Tooele County Health & Aging Services
Executive Director

Date

Title VI Compliance Monitoring

Tooele County Aging Services agrees to participate in on-site reviews and cooperate with Compliance Staff throughout the review process.

In conducting on-site reviews, the UDOT PTT Compliance Officer looks for the following:

1. Clearly displayed Title VI posters with the required information (in vehicles and in public spaces)
 - a. Description of Title VI
 - b. Explanation of how to obtain Title VI information
 - c. Explanation of how to file a complaint
 - d. Available complaint forms
2. Current file containing complaints
3. UDOT conducts periodic on-site monitor assessments to determine the subrecipient's compliance with the FTA Title VI regulations. These reviews include service measurements, location of transit service and facilities, participation opportunities in the transit planning and decision-making processes, and communication needs of persons with limited English proficiency (LEP).

Tooele County Aging Services agrees to participate in training that includes Title VI and its requirements. The UDOT PTT Compliance Officer presents the following:

1. Introduces Title VI and its requirements for compliance
 - a. Provides information regarding outreach opportunities to minority populations and demographic information
2. Provides sample Title VI posters (including required signatures and contact information)
 - a. Discusses required poster locations
3. Discusses LEP and provides the sample UDOT LEP tools
4. Discusses Title VI complaint forms
5. Provides sample Title VI complaint forms
6. Discusses the required maintenance of a Title VI file readily available for review
7. Discusses the reporting requirements and the annual Certification and Assurances
 - a. Discusses the required Title VI verification, including a description of lawsuits and complaints for the past year

In addition to new sub recipients, training by the UDOT PTT Compliance Officer and UDOT Civil Rights staff is also conducted as requested and as changes in the law occur, as needed.

Both the Compliance Officer and the Civil Rights staff are also available any time as a technical resource for questions or concerns regarding Title VI and its requirements.

Certification and Assurance Submission

Tooele County Aging Services agrees to submit the annual Title VI assurance to UDOT as part of the annual Certification and Assurance submission.

Title VI Complaint Procedures

UDOT investigates and tracks Title VI complaints filed with UDOT against subrecipients.

Procedure for Investigations, Complaints and Lawsuits

UDOT has developed and maintains a list of any active investigations conducted by entities other than FTA, lawsuits, or complaints naming the recipient and/or subrecipients that allege discrimination on the basis of race, color, or national origin. This list includes the date the investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by the recipient or subrecipient in response to the investigation.

Tooele County Aging Services has developed procedures for investigating and tracking Title VI complaints filed against them and has made those procedures for filing a complaint available to the public. The Tooele County Aging Services complaint procedure is outlined below:

Complaint Procedure

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by Tooele County Aging Services may file a Title VI complaint by completing and submitting the Agency's Title VI Complaint Form. The Tooele County Aging Services investigates complaints received no more than 180 calendar days after the alleged incident. The Tooele County Aging Services will process complaints that have completed all elements of the complaint form.

Once the complaint is received, Tooele County Aging Services will review it to determine that Tooele County Aging Services has jurisdiction. The complainant will receive an acknowledgment letter informing her/him whether the complaint will be investigated by Tooele County Aging Services

Tooele County Aging Services has 10 business days to investigate the complaint. If more information is needed to resolve the case, Tooele County Aging Services may contact the complainant. 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 calendar days, the investigator can administratively close the case. A case can also be administratively closed if the complainant no longer wishes to pursue the case.

After the investigator reviews the complaint, Tooele County Aging Services will issue one of two letters to the complainant:

1. A closure letter that summarizes the allegations and states there was not a Title VI violation and that the case will be closed.
2. A Letter of Finding (LOF) that summarizes the allegations and the interviews regarding the alleged incident, and explains if 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 10 calendar days after the date of the closure letter or the LOF to do so. If an appeal has been submitted Tooele County Aging Services will forward appeals to the UDOT Civil Rights Title VI Coordinator within 10 days.

When a complaint has been directly filed with another state or federal agency, the Agency is to inform the Title VI Coordinator where the complaint has been filed and coordinate any action needed by UDOT to resolve the complaint.

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

A person may also file a complaint directly with Utah Department of Transportation at:

Public Transit Programs Director
4501 West 2700 South
P.O. Box 141520
Salt Lake City, UT 84114-3600

Title VI Informal Complaint Policy

Title VI complaints may be resolved by informal means. When informal means are utilized, the complainant must be informed of their right to file a formal written complaint. Such informal attempts and their results will be summarized by Tooele County Aging Service's identified Title VI Coordinator. The coordinator will log the complaint in the required complaint log (see Appendix D for a sample). If the complaint cannot be resolved informally Tooele County Aging

Service's identified Title VI Coordinator must inform the complainant of the formal process outlined above and instruct the complainant on how to proceed.

Title VI Log of Complaints/Lawsuits, etc.

Tooele County Aging Services will prepare and maintain a list of any alleged discrimination on the basis of race, color, or national origin, including any active investigations conducted by entities other than FTA, lawsuits, and complaints naming the Agency. The list will include the date that the investigation, lawsuit or complaint was filed; a summary of the allegation(s) and date resolved. See Appendix D for sample complaint log.

Title VI Notice to the Public

Tooele County Aging Services will provide information to the public regarding Tooele County Aging Service's obligations under FTA's Title VI regulations and apprise members of the public of the protection against discrimination afforded to them by Title VI. At a minimum, Tooele County Aging Services shall disseminate this information to the public by posting the notice on its website. Tooele County Aging Services will document where and when this information is posted.

Tooele County Aging Services will widely distribute its Title VI plan. The Title VI notifications are also included with all newly printed or revised agency publications, brochures and pamphlets meant for public consumption. The following notice is standard wording for publications, brochures, flyers, etc.:

Tooele County Aging Services is committed to compliance with Title VI of the Civil Rights Act of 1964 and all related regulations and relevant guidance. The Agency assures that no person in the United States shall, on the grounds of race, color or nation 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.

To request additional information on Tooele County Aging Service's Title VI policy, or to file a discrimination complaint, please contact Tooele County Aging Services at 435-843-4115.

The Complaint Procedure is available in hard copy format at 59 E. Vine Street, Tooele, UT 84074. Additionally, the Complaint Procedure is available on the web at:

<http://www.co.tooele.ut.us/Aging/contactus.htm>.

Title VI Poster

Tooele County Aging Services will provide a UDOT-developed Title VI poster to meet the requirements listed below and will provide updates as required. Tooele County Aging Services will also keep a database of the location of all Title VI posters and ensure they are clearly posted in the appropriate public places. The UDOT posters include the following information:

- Description of agency Title VI commitment
- Information for more of Agency's Title VI program and the procedures to file a complaint, contact information, email, and address
- For more information, visit www.co.tooele.ut.us/aging.htm
- FTA and UDOT Office of Civil Rights, Attention Title VI Program Coordinators, address to file a complaint directly with either the state or federal agency directly
- Additional information if another language is needed 435-843-4115. This will be included on the English poster in Spanish, which is the only limited English proficiency population which meets the Safe Harbor Threshold in Tooele.

Public Participation Plan

Tooele County Aging Services will work with UDOT staff to identify targeted minorities within the service area. UDOT PTT staff will supply demographic information to the lowest census level possible within the region to identify specifically what minority populations exist within the Tooele County Aging Service's service area. Tooele County Aging Services will identify the appropriate locations to disseminate information to the identified populations (e.g., church, neighborhood gathering space) to seek comment, interest in new service or service revisions and/or extensions. Tooele County Aging Services will document and maintain on file all activities related to Title VI outreach. This plan and documentation will be made available at UDOT's request.

Tooele County Aging Services will coordinate with the regional mobility manager to ensure that Tooele County Aging Services is included in regional planning efforts and that regional planning efforts include outreach to targeted populations within the Tooele County Aging Service's service area.

Tooele County Aging Services will provide a summary to UDOT of all outreach efforts upon request or prior to future plan submittals and review.

Tooele County Aging Services recognizes that future funding for new or revised service requires documentation of the above efforts.

Limited English Proficiency (LEP) Requirement

Tooele County Aging Services is committed to compliance with Title VI of the Civil Rights Act of 1964 and all related regulations and directives. By completing the Four Factor Analysis below, Tooele County Aging Services assures 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 otherwise subjected to discrimination under any FTA service, program, or activity.

1. Indicate the number or proportion of LEP persons eligible to be served or likely to be encountered by the program.
 - a. Describe how LEP persons interact with the Agency.
 - b. Identify LEP communities by language group.
 - c. Identify whether LEP persons are underserved by the Agency service due to language barriers.
2. Indicate the frequency with which LEP persons come into contact with the program through the following methods:
 - a. Buses
 - b. Public meetings
 - c. Customer service interactions
 - d. Surveys
3. Describe the service and the nature of importance of the service (narrative).
 - a. Participate in the development of the coordinated plan to meet the specific transportation needs of seniors and people with disabilities especially those with LEP needs.
 - b. Include special language assistance for public meetings.
4. Indicate the resources available to Agency for LEP outreach, as well as the costs associated with that outreach.

Tooele County's Limited English Proficiency Plan is included as Appendix A.

Membership of Non-Elected Committees and Councils

Tooele County Aging Services currently has no committees which are appointed by Aging Services. Membership on Tooele County Mobility Council is voluntary and open to the public.

Ongoing Staff Training

All Tooele County Aging Services staff and volunteers will be trained either annually or as newly hired staff/volunteers on Title VI. Training will include the following documents:

- Non-discrimination poster

- Title VI complaint form
- Complaint log
- LEP
- Title VI brochure

Tooele County Aging Services will utilize UDOT staff to assist with trainings. Affidavits will be signed when training is completed and filed as part of the Title VI program documentation.

APPENDIX A:

Limited English Proficiency Plan

Introduction

Most persons living in the United States read, write, speak, and understand English. There are many persons, however, for whom English is not their primary language. If those persons have a limited ability to read, write, speak or understand English, they are limited English proficient, or “LEP.” Language barriers often inhibit, or prohibit, LEP persons from accessing benefits and services, from understanding and exercising rights, from fulfilling responsibilities and obligations, and from understanding information provided to them regarding federally funded programs, activities, and services.

In an effort to provide continuing, cooperative, and comprehensive transportation planning for residents of the region, Tooele County has developed the Limited English Proficiency Plan. The LEP Plan outlines how to identify persons who may need language assistance, the ways in which assistance may be provided, staff training that may be required, and how to notify LEP persons that assistance is available. The goal of the LEP Plan is to ensure that all residents of Tooele County can, to the fullest extent practicable, participate in the transportation planning and decision-making process.

Title VI and Executive Order 13166

Tooele County is committed to incorporating Environmental Justice elements and Title VI considerations into its public outreach. During the public participation process, populations that have been traditionally underserved by existing transportation systems, including but not limited to low-income and minority households, are sought out and their needs considered.

Title VI states that no person is excluded from participation in, denied the benefit of, or subjected to discrimination under any program or activity receiving federal financial assistance on the basis of race, color, national origin, age, sex, disability, or religion. Title VI prohibits discrimination: whether intentional or where the unintended effect is unduly burdensome. The Tooele County Title VI Complaint Procedure outlines the Tooele County Title VI policy, how an individual may submit a complaint, how the complaint will be investigated and potential resolution scenarios.

On August 11, 2000, President Clinton signed Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency." The Executive Order requires Federal agencies to examine the services they provide, identify any need for services to those with limited English proficiency (LEP), and develop and implement a system to provide those services so LEP persons can have meaningful access to them. It is expected that agency plans will provide for such meaningful access consistent with, and without unduly burdening, the fundamental mission of the agency. The Executive Order also requires that the Federal agencies work to ensure that recipients of Federal financial assistance provide meaningful access to their LEP applicants and beneficiaries.

This LEP Plan outlines Tooele County’s efforts to make information available to limited English proficient persons. According to U.S. Department of Transportation Guidelines, a four-factor analysis is used to evaluate the extent to which language assistance measures are required to ensure meaningful access to LEP persons.

Four Factor Analysis

The four-factor analysis considers:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity or service.
2. The frequency with which LEP individuals come in contact with the program.
3. The nature and importance of the program, activity or service provided by the federal-funding recipient to people’s lives.
4. Resources available to federal-funding recipients and costs of language assistance.

Factor 1 Analysis - The number and proportion of LEP persons in the service area.

The latest Census Bureau data was reviewed in order to analyze the profile of Tooele County’s population. For the purposes of the LEP Plan, persons that identified themselves as speaking English less than “very well” are considered LEP persons.

Table 1 is reflective of the Tooele County population who speak English less than “very well” and meet the Safe Harbor Provision. The Safe Harbor Provision states that federal agencies are considered to have strong evidence of compliance if they have translated vital documents into the languages for LEP groups numbering 5% of the population or 1,000 persons, whichever is less. Spanish is the only language for which the Safe Harbor Provision is met.

Table 1: Total LEP Population, Tooele County

	Total Pop	% of Total Pop	% of LEP
Tooele County	59,973	100	
Total LEP*	5,217	8.70%	100%
Spanish	3,137	6%	61%

Source: U.S. Census Bureau; American Community Survey, 2010-2014 5 – Year Estimates

<http://datausa.io/profile/geo/tooele-county-ut/#demographics>

A list of all persons speaking English less than “very well” is included, by language as Attachment 1.

Factor 2 Analysis - The frequency in which LEP Persons Encounter the Tooele County Programs.

Tooele County is an area with a rapidly growing population. Encounters with LEP populations are likely to grown in the future.

Tooele County Aging Services comes into contact with LEP persons approximately ten times per month. These encounters are all with people who speak Spanish. As noted elsewhere, Tooele County Aging has staff on hand with fluent Spanish – speaking ability.

Factor 3 Analysis - The Importance of the Service Provided by Tooele County

Tooele County provides a range of services to Tooele County residents including public safety, record keeping, planning and community development, and other community services. Among the most important of the services, are those transportation services provided through the Tooele County Department of Health's Aging Services. Ensuring access to services for the population age 60 and over and to persons with disabilities is vital to overall community health.

Inclusive public participation is a priority consideration in all Tooele County plans, studies and programs. Understanding and continued involvement are encouraged throughout all processes.

Tooele County currently posts agendas for all Council meetings, which are open to the public.

Factor 4 – The Resources Available and Overall Cost

The fourth and final factor of the analysis weighs the preceding three factors to assess the needs of LEP persons within the County against the resources available to the County and the costs of providing access.

Tooele County seeks input from all stakeholders, and every effort is made to ensure that the public process is as inclusive as possible. Continued public involvement and participation is encouraged throughout the process. Given the high percentage of Spanish - speaking persons who speak English less than "very well," Tooele County translates all vital documents to Spanish. Vital documents, as defined by FTA, are those documents that provide access to essential services. Examples of vital documents include a Title VI complaint form and notice of a person's rights under Title VI.

In addition to vital document translation, Tooele County has Spanish – speaking staff on hand to address oral questions and provide language translation. Tooele County is committed to providing free oral language translation services at any time requested, as long as appropriate time is allowed to acquire translation services.

MEETING REQUIREMENTS & IMPLEMENTATION

Identifying LEP Individuals Who Need Language Assistance

When first encountering a LEP individual in a face-to-face situation, Tooele County staff will use language identification flashcards developed by the U.S. Census Bureau. These cards have the phrase, "Mark this box if you read or speak 'name of language,'" translated into 38 languages. They were designed for use by government and nongovernment agencies to identify the primary language of LEP individuals during face-to-face contacts. The Census Bureau's Language Identification Flashcard can be downloaded for free at <http://www.lep.gov/ISpeakCards2004.pdf>. Tooele County plans to make them available at public meetings and other community input events. Once a language is identified, a relevant point of contact will be notified to assess feasible translation or oral interpretation assistance.

Types of language services available

In the event that Tooele County should receive a request for assistance in a language other than English, staff members will take the name and contact information of the person. If the language requested is Spanish, Spanish – speaking County employees will be contacted to arrange oral language translation. Tooele County will seek oral language translation assistance if a language besides Spanish is requested.

Within its budget and capabilities, the Tooele County staff pledges that it will, to the best of its abilities, ensure that LEP persons have a meaningful opportunity to participate in the planning and decision-making process.

Staff Training

Current staff members and incoming staff members will be briefed on the LEP Plan and how to assist LEP persons. They will also be instructed to keep a record of language assistance requests so that needs may be accurately assessed in the future.

Monitoring and Updating the LEP Plan

This LEP Plan is designed to be flexible and one that easily can be updated. At a minimum, Tooele County will follow the Title VI program update schedule, as directed by UDOT. Tooele County understands that its community profile continues to change and that the four-factor analysis may reveal the need for additional LEP services in the future. As such, Tooele County will examine its Title VI Plan to ensure that it remains reflective of the community's needs, during regular updates to the Public Involvement Policy.

Each update should consider the following components:

- How many LEP persons were encountered? Were their needs met?
- What is the current LEP population in Tooele County?
- Has there been a change in the types of languages where translation services are needed?
- Has Tooele County's available resources, such as technology, staff, and financial costs, changed?
- Has Tooele County fulfilled the goals of the LEP Plan?
- Were there any complaints received?
- Have new federal or state regulations concerning LEP Plans been approved that necessitate the changes to the current LEP Plan or process for addressing LEP persons?

Providing Notice to LEP Persons

It is important to notify LEP persons of services available free of charge in a language that would be understood. Tooele County posts UDOT's Title VI Notice at the reception desk to the County, as well as in public meeting spaces.

Dissemination of the WFRC Limited English Proficiency Plan

The LEP Plan will be posted on the WFRC website at: wfrc.org. Copies of the LEP Plan will be provided to the Utah Department of Transportation (UDOT), the Federal Transit Administration (FTA), the Federal Highway Administration (FHWA), and any person or agency requesting a copy.

Any questions or comments regarding this plan should be directed to:

Title VI Coordinator
59 East Vine Street
Tooele, UT 84074
(435) 843-4115
Fax: (435) 882-6971

Attachment 1: Limited English Proficient Populations, Tooele County

LANGUAGE SPOKEN AT HOME	Estimate	Percent
Population 5 years and over	54,541	54,541
English only	49,809	91.3%
Language other than English	4,732	8.7%
Speak English less than "very well"	1,606	2.9%
Spanish	3,137	5.8%
Speak English less than "very well"	1,150	2.1%
Other Indo-European languages	811	1.5%
Speak English less than "very well"	157	0.3%
Asian and Pacific Islander languages	507	0.9%
Speak English less than "very well"	240	0.4%
Other languages	277	0.5%
Speak English less than "very well"	59	0.1%

Source: U.S. Census Bureau; American Community Survey, 2010-2014 5 – Year Estimates
<http://datausa.io/profile/geo/tooele-county-ut/#demographics>

APPENDIX B: UDOT Title VI Complaint Procedure and Investigation Guidelines

A. SCOPE OF TITLE VI COMPLAINTS

Any person who believes they have been aggrieved by an unlawful discriminatory practice under Title VI may individually or through a legally authorized representative make and sign a complaint and file the complaint with the UDOT Title VI Compliance Specialist. Allegations received do not have to use the key words “complaint,” “civil rights,” “discrimination,” or even their near equivalents. It is sufficient if such allegations imply any form of unequal treatment in one or more of our programs for it to be considered and processed as an allegation of a discriminatory practice.

B. UDOT TITLE VI PUBLIC NOTICE PROCESS

The Utah Department of Transportation has given assurance for the protection of the general public in accordance with Title VI. The UDOT, by a public notice process, affords the general public an opportunity to formally complain to the Department with regard to the Department’s treatment of Agency activities as they may adversely affect some. Public notices relating to UDOT Title VI Complaint Procedures shall be published annually in newspapers having a general circulation in the vicinity of proposed projects. As a minimum, such public notice shall contain the following:

1. UDOT assurance of compliance with Title VI of the Civil Rights Act of 1964 and Departmental Policy concerning non-discrimination in all UDOT activities.
2. Public right to file complaints.
3. One hundred eighty (180) calendar day time limit for filing of complaints.
4. Complaint filing procedure. An example of such “UDOT Notice to the Public” is included as Appendix D.

C. UDOT TITLE VI FORMAL COMPLAINT PROCEDURE

AUTHORITY

49 CFR 21.11 (b), U.S. DOT’S Title VI Regulations

“Any person who believes himself or any specific class of persons to be subjected to discrimination prohibited by this part may by himself or by a representative file with the Secretary a written complaint. A complaint must be filed no later than 180 calendar days after the date of the alleged discrimination, unless the time for filing is extended by the Secretary.”

This section outlines the Title VI complaint procedures, which will be followed in processing and conducting the investigation of complaints alleging discrimination under Title VI of the Civil Rights Act of 1964. These procedures define the responsibilities of the Title VI Coordinator with respect to investigation and resolution of complaints.

1. Any person who believes they have been aggrieved by an unlawful discriminatory practice under Title VI may individually or through a legally authorized representative make and sign a complaint and file the complaint with the UDOT Title VI Coordinator. Allegations received do not have to use the key words “complaint,” “civil rights,” “discrimination,” or even their near equivalents. It is sufficient if such allegations imply any form of unequal treatment in one or more of our programs for it to be considered and processed as an allegation of a discriminatory practice.
2. Within ten (10) calendar days, the Title VI Coordinator will acknowledge receipt of the allegation. A notification letter will be sent to the complainant of the action taken or proposed action to process the allegation, and advise the complainant of other avenues of appeal available to them if they do not agree with the decision.

The notification letter will contain:

- a. The basis for the complaint.
- b. A brief statement of the allegations over which UDOT has jurisdiction.
- c. A brief statement of UDOT’s jurisdiction over the recipient to investigate the complaint; and
- d. An indication of when the parties will be contacted.

Depending upon the nature of the complaint, the complainant may go to the following:

- a. U.S. Department of Justice (USDOJ)
- b. The filing of complaints with FHWA, FTA or FAA must be within the appropriate jurisdictional time frame. Each agency must be contacted by the complainant for the specific appeal procedure to be followed.

3. The Title VI Coordinator will review and determine the appropriate action regarding every complaint. UDOT will not proceed with or continue a complaint investigation if:
 - a. The complaint is, on its face, without merit.
 - b. If, the same allegations and issues of the complaint have been addressed in a recently closed investigation or by previous Federal court decisions.
 - c. The complaint allegation is moot and there are no class allegations; or
 - d. The complainant's or injured party's refusal to cooperate (including refusal to give permission to disclose his or her identity) has made it impossible to investigate further.

4. The Title VI Coordinator will also notify the appropriate DOT modal agency, i.e. FHWA, FAA, or FTA Regional Office of Civil Rights within ten (10) calendar days of receipt of the allegations.
 - a. Name, address, and phone number of the Complainant.
 - b. Name(s) and address(es) of persons alleged to have been involved in the act.
 - c. Basis of alleged discrimination (i.e., race, color, sex, national origin, disability, or age). Federal Transit Title VI discrimination complaints covers race, color or national origin. Physical or mental disability is added due to the Rehabilitation Act of 1973 and the Americans with Disability Act of 1990.
 - d. Date of alleged discriminatory act(s).
 - e. Date complaint was received by the UDOT.
 - f. A brief statement of the complaint.
 - g. Other agencies (state, local or federal with which the complaint has been filed).
 - h. An explanation of the actions the Department has taken or proposed to resolve the issues raised in the complaint.

5. Within sixty (60) calendar days, the Title VI Coordinator and appropriate Program Designee will conduct and complete an investigation of the allegation, and based upon the information obtained, will render their recommendation for action in a report of findings to the Director of the UDOT. The report will be completed with the coordination and consultation of the Department's General Counsel.

6. The Utah Department of Transportation will establish procedures for promptly resolving deficiency status and reducing to writing the remedial action considered necessary. All within a period not to exceed sixty (60) calendar days.

7. A copy of the complaint together with a copy of the UDOT's report of the investigation shall be forwarded to Federal Transit, Regional Civil Rights Officer within (60) calendar days of the date the complaint was received by UDOT.

D. UDOT TITLE VI INFORMAL COMPLAINT POLICY

1. Title VI complaints may be resolved by informal means. When informal means are utilized, the complainant must be informed of their right to file a formal written complaint. Such informal attempts and their results will be summarized by the Title VI Designee and forwarded to the Title VI Coordinator.
2. Any complaint received in writing shall be considered to be a formal complaint and shall be handled under the formal complaint procedure outlined above.
3. The Title VI Coordinator will periodically inform the Federal Transit, Regional Civil Rights Officer regarding the status of complaints.
4. When a complaint has been directly filed with another state or Federal agency, the Title VI Coordinator is to be informed by the Agency where the complaint has been filed and coordinate any action needed by the UDOT to resolve the complaint.

APPENDIX C:

**Utah Department of Transportation
Civil Rights Division
P O Box 141520
Salt Lake City, Utah 84114-1520
(801) 965-4384
Fax: (801) 965-4101**

TITLE VI COMPLAINT FORM

Complaints must be in writing and filed with the UDOT Title VI Coordinator within 180 calendar days following the date of the alleged discriminatory occurrence. Complainant has a right to representation, file a written complaint with FTA, Regional Civil Rights Officer, and complainant has the option to remain anonymous or to seek assistance in filling out the complaint form.

Your Name _____ Date of Filing _____

Your Address _____

Work Phone _____ Home Phone _____ Cell Phone _____

FTA recognizes race, color and national origin as basis for Title VI complaints. Indicate on what ground(s) you believe you were discriminated against by checking the applicable boxes below:

Race **Color** **Nat. Origin**

Explain why you believe discrimination has taken place. Please provide date(s), time(s), and location(s) of discrimination. Please provide witness name(s), address (es), and telephone number(s). Please provide name(s) and work location(s) of person(s) you believe responsible for the discrimination. Explain the resolution you request. (Use additional sheets of paper if needed.)

Indicate the person(s) who are alleged to be responsible.

Name(s)	Agency	Work Location (if known)	Classification (if known)

What Remedy? Requested Action? And/or Adjustment you are requesting? Please be specific.
Use additional sheets as necessary. _____

The complainant may also file a complaint directly with Tooele County Aging Services by filing a complaint with the Tooele County Title VI Coordinator at:

Tooele County Aging Services
Title VI Coordinator
59 East Vine Street
Tooele, UT 84074
(435) 843-4115
Fax: (435) 882-6971

Your Signature _____ Date

Form SFN 51795
Revised: June 1, 2011

Departament de Transporte de Utah
Division de Derechos Civiles
PO Box 141520
Salt Lake City, Utah 84114-1520
Tel (801) 965-4384
Fax (801) 965-4101

FORMULARIO DE QUEJAS TITULO VI

Quejas deben ser sometidas por escrito y presentadas al Coordinador de Titulo VI durante los 180 días a partir de la fecha en que ocurrió la presunta discriminación. El demandante tiene derecho a representación. Someta su queja por escrito a FTA, Oficial de Derechos Civiles de la Region. El demandante tiene la opción a permanecer anónimo o solicitador ayuda llenando el formulario de quejas.

Nombre _____ Fecha _____

Dirección _____

Tel Empleo _____ Tel Hogar _____ Tel Cel _____

FTA reconoce raza, color, y origen nacional como bases para quejas al Titulo VI. Indique el motivo por el cual cree haber sido discriminado(a) marcando una de las siguientes opciones:

- Raza** **Color** **Origen Nacional**

Explique porqué cree que ha sufrido discriminación. Por favor provea fecha(s), hora(s), y lugar(es). Por favor provea nombres de testigo(s), direccion(es), y número(s) de teléfono. Por favor provea nombre(s) y lugar(es) de empleo de la(s) persona(s) quienes usted cree son responsables de la discriminación.

Explique la resolución que está pidiendo. (Use mas hojas si es necesario)

Indique que persona(s) son presuntamente responsables

Nombre(s)	Agencia	Lugar de empleo (si disponible)	Clasificación (si disponible)

¿Qué remedio, acción, o ajuste está solicitando? Por favor sea específico(a). Use mas hojas si es necesario.

El demandante también puede presentar una queja directamente con Tooele County Aging Services mediante la presentación de una queja ante el Coordinador del Título VI del Condado de Tooele en:

Condado de Tooele Aging Services
 Coordinador del Título VI
 59 East Vine Street
 Tooele, UT 84074
 (435) 843-4115
 Fax: (435) 882-6971

Firma _____ Fecha _____

51797
 October 24, 2011

Form SFN
 Revised:

APPENDIX D:

Title VI Complaint Log

FTA COMPLAINT LOG

Date _____ Name of Agency _____
Person who prepared report _____
Contact Information: Phone _____ Email _____

A Date of Complaint	Complainant	Race	Color	National Origin	Recipient	Date Investigation Completed	Disposition	Date Of Disposition	Other Information	Referred To FTA

APPENDIX E:

Notice to the Public

Tooele County Aging Services

- Tooele County Aging Services 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 Tooele County Aging Services Civil Rights Department or appropriate individual.
- For more information on the Tooele County Aging Services civil rights program and the procedures to file a complaint, see www.co.tooele.ut.us/aging.htm.
- Complaints must be filed in person or in writing. Complaints should be directed to:
Tooele County Aging Services
59 East Main Street
Tooele, UT 84074
- A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint at:
Federal Transit Administration, Office of Civil Rights
Attn: Title VI Program Coordinator
East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE
Washington, DC 20590
- For information in another language, contact the UDOT reception desk at 801-965-4000 or go to UDOT's Translators website at www.udot.utah/go/Title6VI

Appendix F:

Title VI Poster



NON-DISCRIMINATION TITLE VI POSTER

Title VI and Nondiscrimination Commitment (FHWA):

Pursuant to Title VI of the Civil Rights Act of 1964 and related laws and regulations, UDOT will not exclude from participation in, deny the benefits of, or subject to discrimination anyone on the grounds of race, color, national origin, sex, age or disability.

Title VI and Nondiscrimination Commitment (FTA):

Pursuant to Title VI of the Civil Rights Act of 1964 and related laws and regulations, UDOT will not exclude from participation in, deny the benefits of, or subject to discrimination anyone on the grounds of race, color and national origin.

Complaint Procedures:

UDOT has established a discrimination complaint procedure and will take prompt and reasonable action to investigate and eliminate discrimination when found. Any person who believes that he or she has been aggrieved by an unlawful discriminatory practice under Title VI has a right to file a formal complaint with UDOT. Any such complaint must be in writing and filed with the UDOT Title VI Coordinator within one hundred eighty (180) calendar days following the date of the alleged discriminatory occurrence. For more information, please contact the UDOT's Title VI Coordinator.

ADA/504 Statement:

Pursuant to Section 504 of the Rehabilitation Act of 1973 (Section 504), the Americans with Disabilities Act of 1990 (ADA) and related federal and state laws and regulations, UDOT will make every effort to ensure that its facilities, programs, services, and activities are accessible to those with disabilities. UDOT will provide reasonable accommodation to disabled individuals who wish to participate in public involvement events or who require special assistance to access

UDOT facilities, programs, services or activities. Because providing reasonable accommodation may require outside assistance, organization or resources, UDOT asks that requests be made at least five (5) calendar days prior to the need for accommodation. Questions, concerns, comments or requests for accommodation should be made to UDOT's ADA Coordinator.

Services are provided free without charge for individuals with special needs with disabilities. Any fees will be paid by the recipient or subrecipient. The public will have access to translators, "I Speak Cards", TTY/TDD services and vital documents translated when requested.

Si se necesita información adicional en otro idioma, por favor llame al: 435-843-4115

UDOT Title VI Coordinator

Becki Bryce
Utah Department of Transportation
Civil Rights Division
4501 South 2700 West, P.O. Box 141520
Salt Lake City, UT 84114-1520
Email: bbryce@utah.gov
Phone: (801) 965-4384 Fax: (801) 965-4101

UDOT ADA Coordinator

Chris Mabey
Utah Department of Transportation
Traffic and Safety Division
4501 South 2700 West, P.O. Box 143200
Salt Lake City, UT 84114-3200
Email: cmaybe@utah.gov
Phone: (801) 965-4272
Hearing Impaired: 711 or 1-800-346-4128

Tooele County Aging Services

Title VI Coordinator

Cissy Morton
59 East Vine Street
Tooele, UT 84074
Email: pmorton@tooelehealth.org
Phone: (435) 843-4115
Fax: (435) 882-6971



CARTEL TITULO VI NO-DISCRIMINACION

Título VI y Compromiso a no discriminación (FHWA):

Según el Título VI de el Acto de Derechos Civiles de 1964 y leyes y reglamentos relacionados, UDOT no quedará libre de participación en, negará beneficios de, o sujetará a discriminación a nadie en base a raza, color, origen nacional, sexo, edad o discapacidad.

Título VI y Compromiso a no discriminación (FTA):

Según el Título VI de el Acto de Derechos Civiles de 1964 y leyes y reglamentos relacionados, UDOT no quedará libre de participación en, negará beneficios de, o sujetará a discriminación a nadie en base a raza, color, y origen nacional.

Proceso para Tramitar Quejas:

UDOT ha establecido un proceso para tramitar quejas de discriminación y tomará acción pronta y razonablemente para investigar y eliminar discriminación cuando ésta suceda. Cualquier persona que crea que él o ella ha sido ofendido(a) por una práctica ilícita y discriminatoria bajo el Título VI tiene derecho a someter una queja formal con UDOT. Tal queja debe ser por escrito y sometida al Coordinador de Título VI de UDOT durante los ciento ochenta (180) días a partir de la fecha del presunto acontecimiento. Para más información, por favor comuníquese con el Coordinador de Título VI de UDOT.

Declaración ADA/504:

Según la Sección 504 de al Acto de Rehabilitación de 1973 (Sección 504), El Acto de Ley para Estadounidenses con Discapacidades de 1990 (ADA) y leyes y reglamentos estatales y federales relacionados, UDOT hará todo esfuerzo para asegurar que sus instalaciones, programas, servicios, y actividades sean accesibles a todos aquellos con discapacidades. UDOT hará modificaciones razonables para individuos con discapacidades quienes deseen participar en eventos públicos o a quienes requieren asistencia especial para accede programas, servicios o actividades. Ya que porveer tales modificaciones puede requerir asistencia de terceras personas, organización o recursos, UDOT pide que cualquier petición sea hecha al menos cinco (5) días antes de la fecha en que se necesita tal modificación. Preguntas o solicitudes deben ser dirigidas al Coordinador de ADA de UDOT.

Los servicios serán proveídos libres de cargo a individuos con necesidades especiales o discapacidades. Cualquier cargo será pagado por el beneficiario. El public tendrá acceso a traductores, tarjetas “Yo Hablo”, servicios TTY/TDD y documentos esenciales traducidos cuando sea necesario.

If additional assistance is needed in another language, please contact: 435-843-4115

Coordinador Título VI de UDOT
Becki Bryce
Utah Department of Transportation
Civil Rights Division
4501 South 2700 West, P.O. Box 141520
Salt Lake City, UT 84114-1520
Email: bbryce@utah.gov
Tel: (801) 965-4384 Fax: (801) 965-4101

Coodinador de ADA de UDOT
Chris Mabey
Utah Department Transportation
Traffic and Safety Division
4501 South 2700 West, P.O. Box 143200
Salt Lake City, UT 84114-3200
Email: cmabey@utah.gov
Tel: (801) 965- 4272
Hearing Impaired: 711 or 1-800-346-4128

Coordinador Título VI de Condado de Tooele Aging Services
Cissy Morton
59 East Vine Street
Tooele, UT 84074
pmorton@tooelehealth.org
Tel: (435) 843-4115
Fax: (435) 882-6971