

# **Title VI Plan for RTC FTA 5310 Subrecipient**

Washoe County Human Services Agency

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Date Adopted: May 21, 2019

Prepared by: Washoe County Human Services Agency

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## **I. INTRODUCTION**

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that "no person in the United States shall, on the ground of race, color, or national 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." (42 U.S.C. Section 2000d).

The Civil Rights Restoration Act of 1987 clarified the intent of Title VI to include all programs and activities of Federal-aid recipients, sub-recipients, and contractors whether those programs and activities are federally funded or not.

Recently, the Federal Transit Administration (FTA) has placed renewed emphasis on Title VI issues, including providing meaningful access to persons with Limited English Proficiency.

Recipients of public transportation funding from FTA and the Regional Transportation Commission (RTC) are required to develop policies, programs, and practices that ensure that federal and state transit dollars are used in a manner that is nondiscriminatory as required under Title VI.

This document details how Washoe County Human Services Agency incorporates nondiscrimination policies and practices in providing services to the public. Washoe County Human Services Agency's Title VI policies and procedures are documented in this plan and its appendices and attachments. This plan will be updated periodically over the two year grant period with RTC to incorporate changes and additional responsibilities that arise.

## **II. OVERVIEW OF SERVICES**

The Washoe County Human Services Agency's Enhanced Transportation Mobility Services project will allow for the expansion of Washoe County Human Services Agency free transportation services to urbanized areas of Washoe County and in particular, those areas in the North Valleys that are not accessible to the senior and disabled population and are outside the ADA boundaries for RTC ACCESS service. Washoe County Human Services Agency desires to take an innovative, holistic approach to address transportation issues for this population by coordinating and planning transportation with the assistance of case workers, clients and their physicians. The implementation of this project would enable riders to call for an appointment within a 24-48 hour turn around response/service. The ability to make their own appointments and/or have assistance in doing so with some independence will address some of the feelings of loss of independence. The purpose of this program is to increase ridership and transportation opportunities for this vulnerable population and help mitigate some of the dependence on an already stressed public transportation system.

### **III. NONDISCRIMINATION ASSURANCE TO RTC**

In accordance with 49 CFR Section 21.7(a), every application for financial assistance from the Federal Transit Administration (FTA) must be accompanied by an assurance that the applicant will carry out the program in compliance with RTC's Title VI Nondiscrimination Policy. This requirement is fulfilled when the Regional Transportation Commission submits its annual certifications and assurances to FTA. RTC shall collect Title VI assurances annually from sub-recipients prior to passing through FTA funds.

Washoe County Human Services Agency submits a Nondiscrimination Assurance which addresses compliance with Title VI as well as nondiscrimination in hiring (EEO) and contracting (DBE), and nondiscrimination on the basis of disability (ADA).

In signing and submitting the FTA Assisted Required Clauses, Washoe County Human Services Agency confirms to RTC, Washoe County Human Service Agency's commitment to nondiscrimination and compliance with federal and state requirements.

### **IV. ORGANIZATION AND TITLE VI PROGRAM RESPONSIBILITIES**

The Washoe County Human Services Agency's Adult and Senior Division Director is responsible for ensuring implementation of the agency's Title VI program. Title VI program elements are interrelated and responsibilities may overlap.

The Adult and Senior Division Director and staff are responsible for substantiating that these elements of the plan are appropriately implemented and maintained, and for coordinating with those responsible for public outreach and involvement, and service planning and delivery including complaint handling, data collection and reporting, annual review and updates, and internal education.

As a subrecipient of FTA funds, Washoe County Human Services Agency is required to submit a Quarterly Report Form to RTC that documents any Title VI complaints received during the preceding quarter and for each year. Washoe County Human Services Agency will also maintain and provide to RTC, on an annual basis, the log of public outreach and involvement activities undertaken to ensure that minority and low income people had meaningful access to these activities.

### **V. POLICY STATEMENT NOTICE TO THE PUBLIC INCLUDING A LIST OF LOCATIONS WHERE THE NOTICE IS POSTED**

Washoe County Human Services Agency is committed to ensuring that no person is excluded from participation in, or denied the benefits of, its services on the basis of race, color or national origin as protected by Title VI of the Civil Rights Act of 1964, as amended.

No person or group of persons will be discriminated against with regard to the Enhanced Transportation Mobility Services program that aims to provide free transportation services to

urbanized areas of Washoe County, and in particular, those areas in the North Valleys that are not accessible to the senior and disabled population outside the ADA boundaries for RTC ACCESS service that Washoe County Human Services Agency provides, on the basis of race, color, or national origin.

This notice will be posted in all vehicles operating for the purpose of the Enhanced Transportation Mobility Services program as well as at the physical location for Senior Services at 1155 East 9<sup>th</sup> Street, Reno, NV 89512.

For additional information on Washoe County Human Service Agency's obligation regarding non-discrimination, please call, 775-328-2575, or write to:

**Washoe County Human Services Agency  
c/o Amber Howell, Director  
350 South Center Street,  
Reno, NV ZIP 89501**

SEE APPENDIX A-Title VI Notice to the Public  
SEE APPENDIX B-Title VI Notice to the Public - List of Locations

## **VI. TITLE VI COMPLAINT PROCEDURES**

Any person who believes he or she has, individually, or as a member of any specific class of persons, been subject to discrimination on the basis of race, color, or national origin may file a Title VI complaint with Washoe County Human Services Agency. The complaint must be in writing and filed within 180 days of the date of the alleged discrimination. The signed, written complaint should include the following information:

- Your name, address, and contact information (i.e., telephone number, email address, etc.); and
- How, when, where, and why you believe you or another person were discriminated against. Include the route, bus number, location, names, and contact information of any witnesses.

The complaint must be filed with Washoe County Human Services Agency at the following location:

**Washoe County Human Services Agency  
Amber Howell, Director  
350 South Center Street  
Reno, NV 89501**

Phone: 775-328-2575

For those requiring hearing or speech assistance, dial 7-1-1 to use Hamilton Relay Nevada or call one of the toll free numbers below:

TTY/ASCII/HCO: 800-326-6868

Voice: 800-326-6888

Spanish: 800-877-1219

STS: 888-326-5658

VCO: 800-326-4013

### **Complaint Assistance:**

Washoe County Human Services Agency staff will provide assistance writing a complaint if the complainant is unable to do so. Washoe County Human Services Agency staff is located at 350 South Center St, Reno, Nevada and 1155 East 9<sup>th</sup> Street, Reno, Nevada, or can be reached by phone at 775-328-2575. Staff is available to provide assistance every day between 8:00 AM and 5:00 PM, excluding scheduled holidays.

Complainants may also file a Title VI complaint with an external entity such as the Regional Transportation Commission (RTC), FTA, or other federal or state agency. However, should a complaint be filed with the Washoe County Human Services Agency and an external entity simultaneously, the external complaint will supersede the Washoe County Human Services Agency complaint. In short, the federal or state agency will complete the investigation of the complaint.

A Spanish version of the complaint procedures is available online,

<https://www.washoecounty.us/seniorsrv/forms.php>.

### **What happens to my complaint filed with Washoe County Human Services Agency?**

All complaints alleging discrimination based on race, color or national origin in a service or benefit provided by the Washoe County Human Services Agency will be recorded and except as provided in the preceding paragraph, promptly investigated. The Washoe County Human Services Agency will commence the formal investigation of a Title VI complaint within fifteen (15) working days of receiving the complaint.

In instances where additional information is needed for assessment or investigation of the complaint, the Washoe County Human Services Agency will contact the complainant in writing. Failure of the complainant to cooperate or to provide the requested information within Fifteen (15) business days from the date of the letter may result in the administrative closure of the complaint. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

The Washoe County Human Services Agency will investigate the complaint and, following review of the facts revealed during the investigation, will prepare a written response to the complainant. If, following the investigation the Washoe County Human Services Agency is unable to conclude that a violation of the statute has occurred, it may administratively close the complaint. A written response, regardless of the decision, will be provided to the complainant. The response will advise the complainant of his/her right to file a complaint externally with federal and state authorities.

The Washoe County Human Services Agency will use its best efforts to resolve a Title VI complaint within sixty (60) working days of its receipt of such a complaint. The complainant may file an external Title VI complaint or appeal the Washoe County Human Services Agency decision with one of the agencies listed below.

**External complaints may also be filed with:**

Regional Transportation Commission  
Director of Administrative Services  
1105 Terminal Way  
Reno, NV 89523

Nevada Equal Rights Commission  
1325 Corporate Boulevard  
Reno, NV 89502

U.S. Department of Transportation  
Federal Transit Administration  
Office of Civil Rights, Region IX  
201 Mission Street, Suite 1650  
San Francisco, CA 94105-1839

**VII. TITLE VI COMPLAINT FORM**

Title VI of the 1964 Civil Rights Act requires that “No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subject to discrimination under any program or activity receiving federal financial assistance.”

The information requested on the Title VI Complaint Form is necessary to assist in the processing of your complaint. Please complete the form to the best of your ability. Washoe County Human Services Agency’s complaint form can be found online at <https://www.washoecounty.us/seniorsrv/forms.php>, or a copy can be obtained in person at 350

South Center St, Reno, Nevada or 1155 East 9<sup>th</sup> Street, Reno, Nevada. If you need translation or other assistance, contact Washoe County Human Services Agency staff at 775-328-2575.

SEE APPENDIX C - Complaint Form in English

SEE APPENDIX D - Complaint Form in Spanish

### **VIII. TITLE VI TRANSPORTATION-RELATED TITLE VI INVESTIGATIONS, COMPLAINTS, AND LAWSUITS**

All complaints alleging discrimination based on race, color or national origin in a service or benefit provided by the Washoe County Human Services Agency will be recorded and promptly investigated. The Washoe County Human Services Agency will commence the formal investigation of a Title VI complaint within ten (10) working days of receiving the complaint.

In instances where additional information is needed for assessment or investigation of the complaint, the Washoe County Human Services Agency will contact the complainant in writing within fifteen (15) working days. Failure of the complainant to cooperate or to provide the requested information by a specified date may result in the administrative closure of the complaint.

The Washoe County Human Services Agency will investigate the complaint and, following review of the facts revealed during the investigation, will prepare a written response for review and approval by the Washoe County Regional Transportation Commission. If, following the investigation the Washoe County Human Services Agency is unable to conclude that a violation of the statute has occurred, it may administratively close the complaint. A written response, regardless of the decision, will be provided to the complainant. The response will advise the complainant of his/her right to file a complaint externally with federal and state authorities.

The Washoe County Human Services Agency will use its best efforts to resolve Title VI complaints within sixty (60) working days of its receipt of such a complaint. The complainant may file an external Title VI complaint or appeal the Washoe County Human Services Agency decision with the agencies listed on the Title VI Notice to the Public.

The Washoe County Human Services Agency will maintain a list of complaints, investigations and lawsuits that will include the date, summary, basis of the complaint, status, and any action(s) taken to resolve.

SEE APPENDIX E - Investigations, Lawsuits, and Complaints



## **IX. PUBLIC PARTICIPATION AND LANGUAGE ASSISTANCE PLAN**

In order to improve access to services by persons with Limited English Proficiency (LEP), Washoe County Human Services Agency has used the four-factor analysis in addressing Public Participation and in developing the Language Assistance Plan (LAP), as a means to identify appropriate language assistance measures needed to be inclusive in access to services.

Washoe County Human Services Agency is comprised of Children Services, Adult Services, and Senior Services for Washoe County, and as a result, has contact to a diverse population across the continuum of care. This reach allows the Agency to provide services to individuals at any stage of life and through coordinated efforts with community providers to meet many of the unique needs of Washoe County's citizens. Washoe County Human Services Agency provides vulnerable individuals of all ages, race, color, and national origin with coordinated and comprehensive access to services. The Enhanced Transportation Mobility Program aims to provide transportation for medical/dental appointments, outpatient procedures, grocery shopping, and related activities to eligible participants at no cost. The target population of the program are individuals over age 60 and those of any age with disabilities.

Senior Services has increased the number of persons receiving one-on-one contact with the Division through effective outreach. Collaborative efforts with partners ensure increased services to the most vulnerable population including individuals aged 85 and over, frail, rural, low-income, limited English speaking, people with disabilities, and all minority groups; the highest priority will be to identify individuals at risk of institutional placement. This includes presentations to community groups and events such a "walk and knock" in low-income neighborhoods. Outreach activities are performed by a bi-lingual employee. In addition, in order to find the highest risk, the Senior Services' Gatekeeper program trains emergency responders with the Reno Fire Department and the Regional Emergency Medical Services Authority (REMSA). Emergency responders identify seniors that are repeat 9-1-1 callers with social, home safety, and caregiver issues, or functional limitations.

As detailed in Table 1 below, the population of persons aged 65 and older in Washoe County is 16% of the total population; 87% of this population speaks only English, with 6% speaking Spanish. Additionally 76% of the population aged 18 to 64 speaks only English, while 18% of the same population is Spanish speaking.

<b>Table 1 Language Spoken at Home for Washoe County</b>	
<b>Washoe County</b>	<b>Population</b>
Total Population	418,502
Population 5 to 17 years	72,028 (17%)
Population 18 to 64 years	279,665 (67%)

Population 65 years and over	66,809 (16%)
<b>Language Spoken at Home</b>	<b>Percent of Population</b>
Population 18 to 64 years	
Speak only English	76%
Speak Spanish	18%
Speak Other Languages	6%
Population 65 years and older	
Speak only English	87%
Speak Spanish	6%
Speak Other Languages	7%

Source: American Community Survey 2017

Washoe County Human Services Agency's Public Information Officer will help to identify and coordinate other means of communication with appropriate agencies. Printed brochures, both in English and Spanish are distributed daily. Spanish brochures and Spanish television and radio will be utilized to educate the Spanish speaking community on program availability and how this agency can support family efforts to maintain a loved one at home. In addition to multiple bi-lingual staff members, our staff uses tools such as Google Translate to communicate one on one with contacts or accesses the UNR language bank for in-person/phone translation.

#### **MINORITY REPRESENTATION ON PLANNING AND ADVISORY BODIES**

Title 49 CFR Section 21.5(b)(1)(vii) states that a recipient may not, on the grounds of race, color, or national origin, "deny a person the opportunity to participate as a member of a planning, advisory, or similar body which is an integral part of the program."

Washoe County Human Services Agency does not have transit-related, non-elected planning boards, advisory councils or committees, or similar committees.

## **X. PLAN APPROVAL DOCUMENT**

This policy has been scheduled for approval during the May 21, 2019 Washoe County Board of County Commissioners meeting. Agendas and minutes are posted on the Washoe County website, [www.washoecounty.us](http://www.washoecounty.us).

**As the Director of Washoe County Human Service Agency, I am committed to ensuring that no person is excluded from participation in, or denied the benefits of transit services on the basis of race, color, national origin, as protected by Title VI according to Federal Transit Administration (FTA) Circular 4702.1B, *Title VI Requirements and Guidelines for FTA Recipients*. I approve this Title VI Implementation Plan for 2019-2021**

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Signature of Authorizing Official      Date

Amber Howell  
Director  
Washoe County Human Services Agency

## **APPENDIX A-Title VI Notice to the Public**

Washoe County Human Services Agency is committed to ensuring that no person is excluded from participation in, or denied the benefits of, its services on the basis of race, color or national origin as protected by Title VI of the Civil Rights Act of 1964, as amended.

No person or group of persons will be discriminated against with regard to the Enhanced Transportation Mobility Services program that aims to provide free transportation services to urbanized areas of Washoe County, and in particular, those areas in the North Valleys that are not accessible to the senior and disabled population outside the ADA boundaries for RTC ACCESS service that Washoe County Human Services Agency provides, on the basis of race, color, or national origin.

This notice will be posted in all vehicles operating for the purpose of the Enhanced Transportation Mobility Services program as well as at the physical location for Senior Services at 1155 East 9<sup>th</sup> Street, Reno, NV 89512.

For additional information on Washoe County Human Service Agency's obligation regarding non-discrimination, please call, 775-328-2575, or write to:

Washoe County Human Services Agency  
c/o Amber Howell, Director  
350 South Center Street,  
Reno, NV ZIP 89501

May 21, 2019

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Amber Howell, Director

## **APPENDIX B-Title VI Notice to the Public - List of Locations**

The notice presented in Appendix A will be posted as follows:

- Senior Services at 1155 East 9<sup>th</sup> Street, Reno, NV 89512
- All vehicles operated for the purpose of the Enhanced Transportation Mobility Services program

## APPENDIX C – Complaint Form in English



# WASHOE COUNTY

## HUMAN SERVICES AGENCY

### TITLE VI COMPLAINT FORM

<b>Section I:</b>					
Name:					
Address:					
Home Phone:		Work Phone:			
Electronic Mail Address:					
Accessible Format Requirements?		Large Print	<input type="checkbox"/>	Audio Tape	<input type="checkbox"/>
		TDD	<input type="checkbox"/>	Other	<input type="checkbox"/>
<b>Section II:</b>					
Are you filing this complaint on your own behalf?			Yes*	<input type="radio"/>	No <input type="radio"/>
*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:		Name:			
		Relationship:			
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	<input type="radio"/>	No <input type="radio"/>
<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.				
<b>Section IV:</b>				
Have you previously filed a Title VI complaint with this agency?	Yes	<input type="radio"/>	No	<input type="radio"/>
<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	<input type="radio"/>	No	<input type="radio"/>
If yes, check all that apply:				
<input type="checkbox"/>	Federal Agency:			
<input type="checkbox"/>	Federal Court:			
<input type="checkbox"/>	State Agency:			
<input type="checkbox"/>	State Court:			
<input type="checkbox"/>	Local Agency:			
Please provide information about a contact person at the agency/court where the complaint was filed.				
Name:				
Title:				
Agency:				
Address:				
Phone:				
<b>Section VI:</b>				
Name of Agency complaint is against:				
Contact Person:				
Title:				
Phone 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

Please submit this form in person at the address below, or mail this form to:

**Washoe County Human Services Agency**  
**Amber Howell, Director**  
**350 South Center Street**  
**Reno, NV 89501**

## APPENDIX D – Complaint Form in Spanish



# WASHOE COUNTY

## HUMAN SERVICES AGENCY

### FORMULARIO DE QUEJAS - TITULO VI

<b>Sección I:</b>											
Nombre:											
Dirección:											
Teléfono casa:				Teléfono trabajo:							
Correo electrónico:											
¿Requisitos de formato accesible?				Letra grande		<input type="checkbox"/>	<input type="checkbox"/>	Audio cinta		<input type="checkbox"/>	<input type="checkbox"/>
				TDD		<input type="checkbox"/>	<input type="checkbox"/>	Otros		<input type="checkbox"/>	<input type="checkbox"/>
<b>Sección II:</b>											
¿Está poniendo esta queja por usted mismo?						Si*	<input type="radio"/>	No	<input type="radio"/>		
*Si usted contestó "Si" a esta pregunta, vaya a la Sección III.											
Si no, favor de anotar el nombre y parentesco de la persona por la que se está poniendo la queja:				Nombre:							
				Parentesco:							
Favor de explicar por qué está poniendo queja para un tercero:											
Favor de confirmar que usted ha obtenido permiso de la persona agravada si usted está poniendo queja para un tercero.						Si	<input type="radio"/>	No	<input type="radio"/>		
<b>Sección III:</b>											
Yo creo que la discriminación que experimenté estuvo basada en (marque los que aplican):											
<input type="checkbox"/>	<input type="checkbox"/>	Raza	<input type="checkbox"/>	<input type="checkbox"/>	Color	<input type="checkbox"/>	<input type="checkbox"/>	Origen nacional			
Fecha de la supuesta discriminación (mes, día, año):											
Explique claramente lo que sucedió y por qué usted cree que se le discriminó en su contra:											



Describa a todos los involucrados. Incluya nombres y datos de contacto de la persona o personas que discriminaron en su contra (si usted la conoce) y también nombres y datos de contacto de testigos.				
<b>Sección IV:</b>				
¿Usted ha puesto una queja Título VI con esta agencia anteriormente?	Si	<input type="radio"/>	No	<input type="radio"/>
<b>Sección V:</b>				
¿Usted ha puesto esta queja con alguna otra agencia federal, estatal o local, o con algún tribunal federal o estatal?	Si	<input type="radio"/>	No	<input type="radio"/>
Si la respuesta es afirmativa, marque los que apliquen:				
<input type="checkbox"/>	Agencia federal:			
<input type="checkbox"/>	Tribunal federal:			
<input type="checkbox"/>	Agencia estatal:			
<input type="checkbox"/>	Tribunal estatal:			
<input type="checkbox"/>	Agencia local:			
Favor de proporcionar información sobre contacto de una persona en la agencia o tribunal donde se puso la queja.				
Nombre:				
Título:				
Agencia:				
Dirección:				
Teléfono:				
<b>Sección VI:</b>				
Nombre de la agencia en contra de quien puso la queja:				
Contacto:				
Título:				
Teléfono:				

Usted puede anexar material escrito u otra información que crea ser relevante a su queja.

**Favor de firmar y anotar la fecha a continuación:**

Firma

Fecha

Favor de entregar este formulario en persona al domicilio a continuación o enviarla por correo a:

Agencia de los Servicios Humanos del Condado de Washoe  
 Amber Howell, Director  
 350 S Center Street  
 Reno, NV 89501

## APPENDIX E - Investigations, Lawsuits, and Complaints

At this time, Washoe County Human Services does not have any investigations, lawsuits, or complaints alleging discrimination to report.

### List of Investigations, Lawsuits, and Complaints

	Date (Month, Day, Year)	Summary (Basis of complaint: Race, Color, National Origin)	Status	Action(s) Taken
<b>Investigations</b>				
1				
2				
<b>Lawsuits</b>				
1				
2				
<b>Complaints</b>				
1				
2				