

**Delphos Senior Citizens, Inc.**

**Title VI Policies**

**And**

**Limited English Proficiency (LEP) Plan**

**Adopted: January 14, 2015**

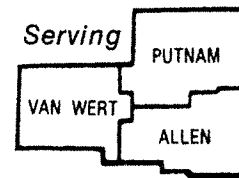
**Updated: July 6, 2016**

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# Delphos Senior Citizens, Inc.

301 E. Suthoff Street  
Delphos, Ohio 45833  
Phone: 419-692-1331  
Fax: 419-692-0148  
Email: delphosseniorcitizens@gmail.com



## Title VI Notice to Public

Delphos Senior Citizens, Inc.

\*Delphos Senior Citizens, Inc. 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 an unlawful discriminatory practice under Title VI may file a complaint with Delphos Senior Citizens, Inc.

\*For more information on Delphos Senior Citizens, Inc.'s civil rights program and the procedure to file a complaint, contact 419-692-1331, email delphosseniorcitizens@gmail.com, or visit our administrative office at 301 E. Suthoff Street, Delphos, Ohio 45833. For more information, visit delphosseniorcitizens.weebly.com.

\*For transportation-related Title VI matters, a complainant may file a complaint directly with the Ohio Department of Transportation by filing a complaint with the Office of Equal Opportunity, Attention: Title VI coordinator, 1980 West Broad St., Columbus, OH 43223.

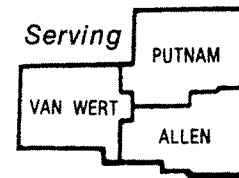
\*For transportation-related Title VI matters, a complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5<sup>th</sup> Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.

\*If information is needed in another language, contact Delphos Senior Citizens, Inc. at 419-692-1331.

Posted: Office Area, Meal Site Area, 4 vans, and website.

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## Title VI Complaint Procedure

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by Delphos Senior Citizens, Inc. (hereinafter referred to as DSC) may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form. DSC investigates complaints received no more than 180 days after the alleged incident. DSC will process complaints that are complete.

Once the complaint is received, DSC will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office.

DSC has 10 business days from the date received to investigate the complaint. Should a case involve the decision of the Board of Directors a decision shall be made within 30 days of the complaint. If more information is needed to resolve the case, DSC 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 business days, DSC can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

After the investigator reviews the complaint, she/he will issue one of two letters to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. An LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member or other action will occur. If the complainant wishes to appeal the decision, she/he has 10 business days after the date of the letter or the LOF to do so.

For transportation-related Title VI matters, a person may also file a complaint directly with the Ohio Department of Transportation, at ODOT Office of Equal Opportunity, Attention: Title VI Coordinator, 1980 West Broad St., Columbus, OH 43223.

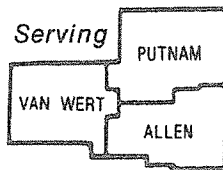
For transportation-related Title VI matters, a person may also file a complaint directly with the Federal Transit Administration, at FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.

If information is needed in another language, then contact 419-692-1331.



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## Title VI Complaint Form

Date:

### Section I

Name:

Address:

Telephone Home:

Telephone Work:

Email Address:

### Section II

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 you have obtained the permission of the aggrieved party if you are filing on behalf of a third party: \_\_\_Yes \_\_\_No

### Section III

I believe the discrimination I experienced was based on (check all that apply):

\_\_\_Race \_\_\_Color \_\_\_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 the page.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**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: \_\_\_\_\_

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

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

\_\_\_\_ Local Agency \_\_\_\_\_

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

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

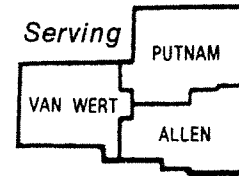
\_\_\_\_\_  
Date

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

Delphos Senior Citizens, Inc.  
Title VI Coordinator  
301 E. Suthoff St.  
Delphos, OH 45833

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## List of Title VI Investigations, Lawsuits and Complaints

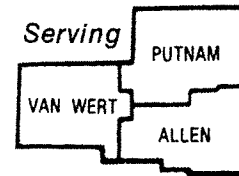
Period: January 1, 2012 - December 31, 2015

	Date (Month, Day, Year)	Summary (include basis of complaint: race, color, or national origin)	Status	Action(s) Taken
<b>Investigations</b>				
1.	None			
2.				
<b>Lawsuits</b>				
1.	None			
2.				
<b>Complaints</b>				
1.	None			
2.				



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## Public Participation Plan

Delphos Senior Citizens was established in 1975 and has annually celebrated Senior Citizen Day in May. While we have a larger than usual crowd at our Senior Citizen Day festivities, we provide a written survey form for each participant to complete. Staff is on hand to assist those who have problems with seeing or reading the survey form and reads aloud each question and marks the appropriate response given by the participant. In addition to this group, our survey is also provided to clients who use our services (such as chore, transportation, outreach, meal site, activities) on a regular basis. Through these surveys, we decide which programs and services need to be added, updated or eliminated.

Delphos Senior Citizens also provides a suggestion box in the activities room, as well as welcoming verbal comments and suggestions on a daily basis. Suggestions are reviewed as received and appropriate action is taken.

Board meetings are open to the public, as are all of Delphos Senior Citizens activities. The Executive Director speaks to area church groups and other clubs and organizations (most recently Delphos Public Library and Green Thumb Garden Club) regarding our programs and activities. Information about our upcoming activities is included in the local newspaper ("The Delphos Herald") and announced on our local radio station (WDOH). Our Delphos Senior Citizen ("DSC Outreach") newsletter is mailed and emailed every other month to area churches and other social service agencies, as well as interested seniors and caregivers.





# **DELPHOS SENIOR CITIZENS, INC.**

## Limited English Proficiency Plan

### **I. Introduction**

The purpose of this limited English proficiency policy guidance is to clarify the responsibilities of recipients of federal financial assistance from the U.S. Department of Transportation (DOT) and assist them in fulfilling their responsibilities to limited English proficient (LEP) persons, pursuant to Title VI of Civil Rights Act of 1964, 42 U.S.C. 200d seq., and its implementing regulations provide that no person shall be subjected to discrimination on the basis of race, color, or national origin under any program or activity that receives federal financial assistance. The Supreme Court, in *Lau v. Nichols*, 414 U.S. 563 (1974), interpreted Title VI regulations to prohibit conduct that has a disproportionate effect on LEP persons because such conduct constitutes national origin discrimination.

### **II. Executive Order 13166**

Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency," reprinted at 65 FR 50121 (August 16, 2000), directs each Federal agency to examine the services it provides and develop and implement a system by which LEP persons can meaningfully access those services. Federal agencies were instructed to publish guidance for their respective recipients in order to assist them with their obligations to LEP persons under Title VI. The Executive Order states that recipients must take reasonable steps to ensure meaningful access to their programs and activities by LEP persons.

Executive Order 13166 further directs that all such guidance documents be consistent with the compliance standards and framework detailed in the Department of Justice's (DOJ's) Policy Guidance entitled "Enforcement of Title VI of the Civil Rights Act of 1964-National Origin Discrimination Against Persons with Limited English Proficiency," (See 65 FR 50123, August 16, 2000 DOJ's General LEP Guidance). Different treatment based upon a person's inability to speak, read, write or understand English may be a type of national origin discrimination.

The U.S. DOT published revised guidance for its recipients on December 14, 2005.

This document states that Title VI and its implementing regulations require that DOT recipients take responsible steps to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are Limited English Proficient (LEP) and that recipients should use DOT LEP Guidance to determine how best to comply with statutory and regulatory obligations to provide meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are LEP.

The FTA references the DOT LEP guidance in its Circular 4702.1B, "Title VI Requirements and Guidelines for Federal Transit Administration Recipients," which was published on October 1, 2012. Chapter III, Part 9 of this Circular reiterates the requirement to take responsible steps to ensure meaningful access to benefits, services, and information for LEP persons and suggests that FTA recipients and subrecipients develop a language implementation plan consistent with the provisions of Section VII of the DOT LEP guidance.

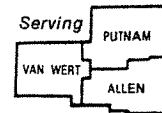
### III. Statement of Policy

It is the policy of Delphos Senior Citizens, Inc. to provide meaningful access to Limited English Proficiency (LEP) persons in a reasonable and timely manner. Should an LEP individual contact Delphos Senior Citizens, Inc. or receive services through Delphos Senior Citizens, Inc. funded programs, every effort will be undertaken to ensure that the individual has access to all available benefits and services.

### IV. Four Factor Analyses

Factor 1: The number or proportion of LEP persons eligible to be served or likely to encounter a Delphos Senior Citizens, Inc. program, activity, or service:

A review of the census data on the numbers of limited English proficient or LEP persons revealed that Spanish had the highest percentage of total population that spoke a language other than English in Allen, Putnam and Van Wert Counties both individually and combined. The total Spanish speaking population in the three county service area was 5,143 or 3.03% of 169,574 total population of the three county service area (See U.S. Census Bureau Data, using American Fact Finder).



Please see the table below for data specific to each county:

	Allen County, Ohio	Van Wert County, Ohio	Putnam County, Ohio	Total
All Citizens	106,331	28,744	34,499	169,574
All Citizens that speak Spanish	2,513	740	1,890	5,143

Source: U.S. Census Bureau American Fact Finder 2010

Factor 2: The frequency with which LEP individuals come in contact with the Delphos Senior Citizens, Inc. program, activity, or service:

In recent history, there has been no known contact at activities, programs or services or through Board members, with an LEP individual. Website access by LEP persons is unknown. The Delphos Senior Citizens, Inc. has in the past served a couple of clients who were LEP and communication was conducted with this client through phone contact or in person.

Factor 3: The nature and importance of the program, activity, or service provided by Delphos Senior Citizens, Inc.:

Delphos Senior Citizens, Inc. provides a wide variety of programs and access to programs that support independence and community living primarily for individuals over the age of 60 or under 60 with a disability.

An LEP person might be in contact with a DSC Outreach Worker in their home or at the Center or may contact the DSC by phone. It is important that information on accessing services to maintain community living status be communicated effectively at every point of contact.

Factor 4: The resources available to Delphos Senior Citizens, Inc. and overall costs:

Delphos Senior Citizens, Inc. is committed to providing access to information, programs and services for the LEP population and provides interpreters should staff come into contact with a Spanish-speaking LEP individual.

Interpreters are compensated for their time and DSC has had no issues to date with covering the costs of the service when warranted by consumer need.

#### **V. Plan for Assisting Persons of Limited English Proficiency**

Describe how recipient provides language assistance service by language:

Delphos Senior Citizens, Inc. provides language assistance service for Spanish-speaking LEP individuals with local interpreters. Spanish speaking individuals represent the highest percentage of LEP individuals in Allen, Putnam and Van Wert Counties but the percentage does not approach the five percent safe harbor threshold.

Interpreter information:

William Langley	1259 Knollwood Drive Lima, Ohio 45801 765-977-2129	Spanish Interpreter
Jaclene Miller	234 N. Jefferson St. Delphos, Ohio 45833 567-204-4541	Spanish Interpreter

Describe how recipient trains employees to provide timely and reasonable language assistance to LEP populations:

Delphos Senior Citizens, Inc. staff will be provided the opportunity to read the LEP plan and to be educated on procedures and services available to LEP populations. Training will be available as part of the orientation process for new hires.

Training topics include:

- Understanding the Title VI LEP program responsibilities;
- What language assistance Delphos Senior Citizens, Inc. offers;
- How to access an interpreter;
- Documentation of language assistance requests;
- How to handle a complaint;

Describe how recipient monitors, evaluates and updates language access plan:

This plan is designed to be flexible and is one that can be easily updated. Delphos Senior Citizens, Inc. will monitor the LEP Plan using the following methods:

Post event assessments of public hearings and community events that examine plan components, such as:

- How many LEP persons were encountered?
- Were their needs met?
- What is the current LEP population in Delphos Senior Citizens, Inc. service area?
- Has there been a change in the types of languages needing interpreters?
- Has Delphos Senior Citizens, Inc. fulfilled the goals of the LEP populations?

Describe how recipient provides notice to LEP persons about the availability of language assistance:

A Title VI Notice to the Public is posted in the Delphos Senior Citizens, Inc. office area, activities area, all vans, and website. Copies of the LEP Plan will be provided upon request to any person(s) requesting the document via phone, fax, in person, by mail or email. LEP persons may obtain copies/translations of the plan upon request. Requests can be made to:

Executive Director  
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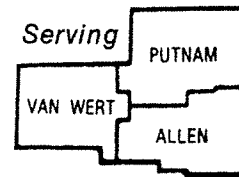


Table Depicting Membership of Committees, Councils, Broken Down by Race

Body	White	Black or African American	American Indian or Alaska Native	Some Other Race	Total must sum to 100%
Board of Directors	100%				100%
Executive/Finance Committee	100%				100%
Personnel Committee	100%				100%

\*We have had minorities serve on our board in the past-there does not seem to be any minorities willing or available at the present time. Please see City of Delphos –Racial Breakdown:

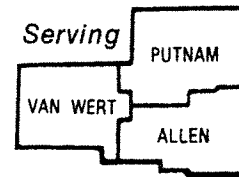
As of the census<sup>[3]</sup> of 2010, there were 7,101 people, 2,893 households, and 1,865 families residing in the city. The population density was 2,064.2 inhabitants per square mile (797.0/km<sup>2</sup>). There were 3,137 housing units at an average density of 911.9 per square mile (352.1/km<sup>2</sup>). The racial makeup of the city was 97.5% White, 0.4% African American, 0.2% Native American, 0.2% Asian, 0.4% from other races, and 1.3% from two or more races. Hispanic or Latino of any race were 1.8% of the population.

- • "American FactFinder". United States Census Bureau.



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## Title VI Equity Analysis

\*As of July 6, 2016 we have not constructed a facility, such as a vehicle storage facility, within the last 4 years.



**DELPHOS SENIOR CITIZENS, INC.**  
**BOARD MEETING**  
**WEDNESDAY, JULY 6, 2016            8:30 A.M.**

The Delphos Senior Citizens, Inc. Board Meeting was opened by Vice President Ron Baumgarte. Members present were: Ron Baumgarte, Sandy Carder, Kathy Gasser, Vicki Gossman, Jeff Moorman and Holly Jacomet. Absent were: Karen Hartman, Marilyn Hoffman, Donna Landin.

Secretary's Report. There being no changes Sandy Carder made a motion to accept the Secretary's Report as read. Seconded by Kathy Gasser. Motion Carried.

Treasurer's Report. Angie is waiting on one more check to clear then she can close the checking account at First Financial Bank into the checking at U.S. Bank. There being no further changes Sandy Carder made a motion to accept the Treasurer's Report as read. Seconded by Jeff Moorman. Motion Carried.

**OLD BUSINESS:**

Board Members 2016-2017. Welcome Holly Jacomet to the Board. Jane Sadler said she would be willing to serve on the Board. Alice will write her a letter welcoming her to the Board and let her know when the meetings are. Dave Eickholt has resigned from the Board. Please bring nominees to the next meeting. If it would work better we can look at changing the Board Meeting day or time also.

Election of Officers. Tabled till next meeting.

Sock Hop- June 15. We had about 25 in attendance. Earlier that day after bingo we had a Trivia contest from 1-1:30 and then played bingo. We had some prizes left from Senior Citizen Day we handed out for Trivia and bingo winners.

Canal Days. We received a quote of \$1 for a 3x5 magnet from Mushroom Plant. Prices from Aero were \$.45 for 500 or \$.76 for 500. We also have the 3-month calendar we can do in house at a cost of about \$.18. After some discussion Sandy Carder made a motion to do the 3-month calendar to pass out at Canal Days. Seconded by Jeff Moorman. Motion Carried. We will also put in there a coupon for a free lunch here at the Center.

2009 Ford. We have the new tires on the van. Alice wrote ODOT for a disposition for this van and we received it. We are still using this van but when we get our new van, this van will be used for a backup.

Van Application. Alice needs an Authorizing Resolution to give her permission to apply for a van. The van we are applying for is a MV-1. Vicki Gossman made a motion to sign the Authorizing Resolution. Seconded by Kathy Gasser. Motion Carried.

We also need a resolution adopting the updated Lima Allen County Regional Planning Commission Plan. We have to be a part of their plan to even be able to apply for a van. This

plan has our hours of service, vans, number of drivers, etc. Sandy Carder made a motion to sign the resolution adopting the updated LACRPC Plan. Seconded by Kathy Gasser. Motion Carried.

Title VI. We have updated the Title VI Policy. After some discussion Vicki Gossman made a motion to accept the changes in the Title VI Policy. Seconded by Jeff Moorman. Motion Carried.

Board Profile. We need to update the Board Profile for the van application.

#### NEW BUSINESS:

Hoedown – August 17. DJ-Rick Dienstberger will be back to do a Hoedown on Wednesday, August 17 from 2-4. Alice is looking for a sponsor. We will also have a Trivia contest again from 1-2 with \$1 prize for correct answers. We will also have some ice cream. We have a couple of ladies from the last dance that have offered to teach line dancing for free. They had their first class Tuesday.

U.S. Bank. Donna Landin notified Alice that they still have money in their grant fund. Alice filled out the Grant Application and asked for the cost of our audit (\$5,750). We have to have an audit done yearly.

Garden Club donation. Alice spoke to the Garden Club and they gave us a donation.

E.S. Evans – beginning audit. They have begun our audit. By waiting to have our audit done during the summer they gave us a break on the cost.

Matter of Balance. Next class will begin July 19 and will be every Tuesday & Thursday thru August 11 from 1-3. Jed Gerold, Outreach Worker and Ed Clark, Part-time Van Driver will be teaching the class. Community Health Professionals will be donating the water.

Lawn Mowers. We have a 2014 Cub Cadet, 2- 2008 Snappers and a 2004 Snapper. We mow approximately 15 lawns a week. It was suggested to call Ace Hardware to check on mowers there. Have the Chore Workers get estimates on mowers.

#### ANNOUNCEMENTS:

Garage Sale – August 11 & 12 from 10-4.

Parking Blocks – Alliance Automation is donating 10 parking blocks to us to use around the building and in the garage.

Quarterly Reports. There is a financial and a unit quarterly report. These reports are sent to the Allen and Van Wert County Commissioners.

United Way of Van Wert County. We requested \$5,000. We received \$2,898 of which \$2,848 was designated directly to the Center.

Bonding. We are bonded here at the Center.

Next Meeting – August 3

There being no further business Sandy Carder made a motion to adjourn. Seconded by Jeff Moorman. Motion Carried. Meeting adjourned at 9:10 a.m.