

AGE of Central Texas

Title VI Program

2021

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## Title VI Notice to Public

# Notifying the Public of Rights Under Title VI

## AGE of Central Texas

- AGE of Central Texas 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 AGE of Central Texas.
- For more information on the AGE of Central Texas civil rights program, and the procedures to file a complaint, contact (512) 451-4611, or [info@ageofcentraltx.org](mailto:info@ageofcentraltx.org), or visit our administrative office at 3710 Cedar Street, Austin, 78705. For more information, visit [www.ageofcentraltx.org](http://www.ageofcentraltx.org).
- A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590
- If information is needed in another language, contact 512-451-4611.

The above Title VI Notice to Public is posted in the following locations:

- Website [www.ageofcentraltx.org](http://www.ageofcentraltx.org)
- Reception desk
- Inside van used for shared ride services
- New client information packet

# Title VI Complaint Procedure

## 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 AGE of Central Texas may file a Title VI complaint by completing and submitting a Title VI Complaint Form. AGE of Central Texas investigates complaints received no more than 180 days after the alleged incident. AGE of Central Texas will process complaints that are complete.

Once the complaint is received, AGE of Central Texas 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.

AGE of Central Texas has 30 days to investigate the complaint. If more information is needed to resolve the case, AGE of Central Texas may contact the complainant. The complainant has 30 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 30 business days, AGE of Central Texas 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 30 days after the date of the letter or the LOF to do so.

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.

# Title VI Complaint Form



**TITLE VI COMPLAINT FORM**

<b>Section I</b>				
Name:				
Address:				
Telephone (Home)			Telephone (Work)	
Electronic Mail Address:				
Accessible Format Requirements?	Large Print		Audio Tape	
	TDD		Other	
<b>Section II</b>				
Are you filing this complaint on your own behalf?			*Yes	No
*If you answered "yes" to this question, go to Section III.				
If not, please supply the name and relationship of the person for whom you are complaining:				
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.			Yes	No
<b>Section III</b>				
<p>I believe the discrimination I experienced was based on (check all that apply):  <input type="checkbox"/> Race    <input type="checkbox"/> Color    <input type="checkbox"/> National Origin  Date of Alleged Discrimination (Month, Day, Year): _____  Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.</p>				
<b>Section IV</b>				
Have you previously filed a Title VI complaint with AGE of Central Texas?			Yes	No
<b>Section V</b>				
Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court? <input type="checkbox"/> Yes <input type="checkbox"/> No				

If yes, check all that apply:	
<input type="checkbox"/> Federal Agency: _____	<input type="checkbox"/> State Agency: _____
<input type="checkbox"/> Federal Court: _____	<input type="checkbox"/> Local Agency: _____
<input type="checkbox"/> State Court: _____	
Please provide information about a contact person at the agency/court where the complaint was filed.	
Name: _____	
Title: _____	
Agency: _____	
Address _____	
Telephone: _____	

You may attach any written materials or other information that you think is relevant to your complaint.

Signature and date required below:

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Signature \_\_\_\_\_ Date \_\_\_\_\_

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

AGE of Central Texas  
 3710 Cedar Street, Box 2  
 Austin, Texas 78705

## Title VI Investigations, Complaints and Lawsuits

**List of Title VI Investigations, Lawsuits and Complaints**

	Date (Month, Day, Year)	Summary (Include basis of complaint: race, color, or national origin)	Status	Action(s) Taken
Investigations				
1.				
2.				
Lawsuits				
1.				
2.				
Complaints				
1.				
2.				

# Public Participation Plan

### **Public Participation Plan**

Community Outreach is a requirement of Title VI. AGE of Central Texas as a recipient of Title VI funding, shall seek out and consider the viewpoints of minority and low-income populations in the course of conducting public outreach. AGE of Central Texas makes the following community outreach efforts to better include all client populations in decision-making processes:

1. Client populations are invited to and encouraged to give feedback on services rendered by AGE of Central Texas
2. AGE of Central Texas's Title VI statements are posted in all AGE of Central Texas offices and online.
3. A contact number can be provided by AGE of Central Texas for individuals requiring special accommodations, including but not limited to deaf interpreters and translators for alternate languages.

Upon request, and within a reasonable timeframe, AGE of Central Texas shall make every effort to render plans and documents in alternative languages and formats.

### **Summary of Outreach Efforts made since the last Title VI Program Submission**

AGE of Central Texas has engaged the public in its planning and decision-making processes, as well as its marketing and outreach activities. To date, we have made the following community outreach efforts:

- Client populations have been invited annually to give feedback on services rendered by AGE of Central Texas.
- Outreach to civic groups, churches, international groups and community agencies.
- Citizens may call AGE of Central Texas at 512-451-4611 to lodge a complaint or comment. All complaints/comments are logged and investigated.
- Brochures outlining Title VI policies and procedures are available in English and Spanish.

Failure to exactly comply with all Plan elements shall not constitute a failure of public process, nor render any actions or decisions invalid.

# Language Assistance Plan

AGE of Central Texas

Limited English Proficiency Plan  
2021

Title VI Coordinator

Annette Cooper

3710 Cedar Street

Austin, TX 78759

(512) 451-4611



## **INTRODUCTION**

This Limited English Proficiency Plan has been prepared to address the AGE of Central Texas responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English proficiency language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C 2000d, et seq, and its implementing regulations, which state that no person shall be subjected to discrimination on the basis of race, color or national origin.

Executive Order 13166, titled Improving Access to Services for Persons with Limited English Proficiency, indicates that differing treatment based upon a person's inability to speak, read or understand English is a type of national origin discrimination. It directs each agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discrimination does not take place. This order applies to all non-federal organizations which receive federal funds, including AGE of Central Texas

## **PLAN SUMMARY**

AGE of Central Texas has developed a Limited English Proficiency Plan to help identify reasonable steps for providing language assistance to persons with limited English proficiency (LEP) who wish to access services provided. As defined in Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write or understand English. This plan outlines how to identify a person 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.

To prepare this plan, AGE of Central Texas used the four-factor LEP analysis which considers the following factors:

1. The number or proportion of LEP persons in the service area who may be served by AGE of Central Texas.
2. The frequency with which LEP persons come in contact with AGE of Central Texas services.
3. The nature and importance of services provided by AGE of Central Texas to the LEP population.
4. The interpretation services available to AGE of Central Texas and overall cost to provide LEP assistance.

A summary of the results of the four-factor analysis is in the following section.

## **FOUR-FACTOR ANALYSIS**

AGE of Central Texas serves Central Texas around Travis County. Our mission is to help older adults and their caregivers thrive as they navigate the realities and opportunities of aging and caregiving.

The table below shows Census data for the area served by AGE of Central Texas.

County	Population (5 years and over)	# of persons that speak a language	# of persons who speak English	Spanish	Indo-European	Asian or Pacific Island	Other Languages
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		other than English	less than "Very Well"				
Travis	1,197,185	368,351 18.6%	134,150 6.8%	101,698 5.1%	8,937 0.5%	17,576 0.9%	5,939 0.3%

Source: American Community Survey, 2019: ACS 1-Year Estimates, Table ID: S1601

**1. The number or proportion of LEP persons in the service area who may be served by AGE of Central Texas services.**

AGE of Central Texas staff reviewed the Census data and determined that 368,351 people in Travis County (18.6% of the population) speak a language other than English. Of those, 134,150 (6.8%) have limited English proficiency; that is, they speak English less than "Very Well." In AGE of Central Texas service area of Travis and Williamson County, of those persons with limited English proficiency, 17,728 speaks Spanish, 2,238 speak Indo-European, and 3,631 speak Asian or other Pacific Islander Languages.

**2. The frequency with which LEP persons come in contact with AGE of Central Texas services.**

AGE of Central Texas board, office staff and volunteers are most likely to encounter LEP individuals through bus/van rides, office visits, phone conversations, and attendance at board meetings. Staff reviewed the frequency with which the board, office staff and volunteers have, or could have, had contact with LEP persons. This includes documenting phone inquiries and office visits. To date, AGE of Central Texas has recorded or estimates 5 requests for interpreters and 10 requests for translated program documents. The board, office staff and drivers have had occasional contact with LEP persons.

**3. The nature and importance of services provided by AGE of Central Texas to the LEP population.**

AGE of Central Texas most critical services are:

- Adult Day Health services
- Providing transportation to and from Adult Day Health program
- Caregiver support and training classes
- Free Durable Medical Equipment

If limited English is a barrier to using these services ,then the consequences for the individual may be serious, including limited access to Adult Day Health services, participation in support groups, access to free adult Durable Medical Equipment and incontinence supplies. Critical information from AGE of Central Texas which can affect access includes:

- enrollment forms
- information pamphlets

**4. The resources available to AGE of Central Texas and costs.**

AGE of Central Texas reviewed its available resources and language assistance measures currently being provided. They include:

- pamphlets printed in English and Spanish
- training on cultural sensitivity to language needs of clients provided to volunteer drivers and staff
- identifying bilingual/multilingual staff and volunteers that are willing to provide language assistance

AGE of Central Texas has determined the following additional services or language measures are needed to provide meaningful access:

- translating pamphlets into Spanish
- contracting with translation and telephone interpreting service providers
- identifying bilingual/multilingual staff and volunteers that are willing to provide language assistance

AGE of Central Texas has analyzed its annual operating budget to determine resources available and the costs associated with additional services and language measures. Limited by budget constraints however existing measures appear to be adequate.

### **LANGUAGE ASSISTANCE PLAN**

AGE of Central Texas has developed the following implementation plan to meet requirements under Title VI of the Civil Rights Act of 1964, which seeks to improve access to services for persons with Limited English Proficiency (LEP). The purpose is to ensure 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 subjected to discrimination under any program or activity receiving Federal financial assistance from the Federal Transit Administration.

#### **Language Assistance Measures and Providing notice to LEP persons**

AGE of Central Texas provides the following language assistance measures:

- pamphlets and flyers printed in English and Spanish
- identifying bilingual/multilingual staff and volunteers that are willing to provide language assistance

#### **Training Staff and Volunteers**

- training on cultural sensitivity to language needs of clients provided to volunteers and staff

#### **Monitoring and updating the LEP Plan**

AGE of Central Texas maintains working relationships with various community organizations that may serve LEP persons including:

- Capital Metro
- Area Agency on Aging

- Family Eldercare

We produce seminars and conferences with many community organizations, and monitor their LEP plans through customer surveys.

Transit-related Non-elected Committees and Council  
Membership

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.” Recipients that have transit-related, non-elected planning boards, advisory councils or committees, or similar committees, the membership of which is selected by the recipient, must provide a table depicting the racial breakdown of the membership of those committees, and a description of efforts made to encourage the participation of minorities on such committees.*

Member’s Name	White, Not Hispanic	Hispanic	African American, Not Hispanic	Asian American, Not Hispanic	Native American
Patti Tauber	X				
Jared Greathouse			X		
Catherine Vergara	X				
John Miller	X				
Mary Beth Chalk	X				
Lina Supnet-Zapata				X	
Brianna McKinney	X				
Julia Menegay	X				
Ronnie Taylor	X				
Liz Nielsen	X				
Ismael Martinez		X			
Margaret DeVinney	X				
Jason McBride	X				
Craig Couch	X				

## Board Resolution



**AGE Board of Directors' Meeting**  
**May 27, 2020**  
**11:30 am – 1:30 pm**

**LOCATION: Video Conference Call**

**Board Members Present:** Patti Tauber, Jared Greathouse, Julia Menegay, Lina Supnet-Zapata, Liz Nielsen, John Miller, Brianna McKinney, Darby Armont, Ronnie Taylor, Margaret DeVinney, Jason McBride, & Craig Couch. (12)

**Absent:** Ismael Martinez, Catherine Vergara, Cindy Swink, & Mary Beth Chalk (4)

**Staff:** Suzanne Anderson, Annette Juba, Annette Cooper, Jayden Beatty, Rob Faubion, and Cindy Fisher.

**I. Call to order at 11:36, Patti Tauber Presiding**

**II. Welcome**

**III. Board Meeting Minutes – March 25, 2020 - Patti Tauber**

Motion	To approve the March 25, 2020 board meeting minutes as presented.
Made	Ronnie Taylor
Second	Jared Greathouse
Vote	Unanimous approval

**IV. AGE – COVID-19 Impact and Response**

- a. Article for BOD – Amid the Coronavirus, a Regimen for Re-entry
- b. AGE Program Update – Annette Juba: Community is surprised how much service we're still providing. Lina called out Cindy Day for her quick response when one of Lina's clients had her wheelchair break.
- c. AGE Communications Plan – Rob Faubion: We have been getting a lot of local press coverage for our continuing service.
- d. Financial Implications and projections – Annette Cooper: Passed out Cash Flow projections thru the end of the year. In June we move to a 25% pay cut, then 20% in October. Staff will be able to use PTO to make up wage gap.
- e. Emergency Funding – Jayden Beatty: We have received \$208,000 in emergency funding grants. Having a Virtual Fundraiser Zoom event on July 16<sup>th</sup>. Women in Aging conference still scheduled for Spring 2021, which will include dinner and a half-day summit.
- f. Implications for Staff – Suzanne Anderson

**V. Financials – John Miller and Annette Cooper**

- a. Review April financials - We are actually ahead of where we were in April of 2019. We lose about \$90,000 a month from having the centers closed. We are in a good position grant- wise.
- b. Vote to Approve April Financials

Motion	To approve the unaudited April Financials
Made	Brianna McKinney
Second	Margaret DeVinney
Vote	Unanimous approval



**VI. Discussion Items**

- a. Building Update and Williamson Thrive Center - Trying to extend our lease in Round Rock for a year rather than move. Many companies are giving up office space, and a lot of others have gone out of business. This has changed the leasing environment in our favor. In South Austin we are finalizing our plan to secure our building permit.
- b. Talking about AGE during this time of uncertainty – Jayden: Continue to talk about what we are doing in the community; stay positive yet share the need for continued support.
- c. Staff Thrive Team Creation – Introduction of Board members to staff: Plan to introduce one board member at each bi-weekly staff meeting.
- d. Board Retreat for 2020 canceled
  - i. Marketing and Communications – Brianna and Rob: Sending examples on how to post AGE on your social media. Also working on Spanish translations for all media.
  - ii. Comprehensive Major Gift – Lina and Jayden
  - iii. Building – Suzanne, Ronnie, Liz
  - iv. Governance – Julia Menegay
    - 1. Board Orientation – June 11<sup>th</sup> 9-11:30.
    - 2. Board Self-Assessment – Will ask everyone to consider your annual goals in July to make sure you’re on track
    - 3. New Board Prospects -need to add members to the board in the areas of CPA, Financial Management, Property Management, Tech industry, and healthcare practitioner with geriatric experience.
    - 4. Board Calendar

**VII. CACFP Motion**

Motion	To acknowledge and accept AGE’s responsibilities and liabilities associated with participation in the CACFP as detailed in the Code of Federal Regulations, Texas Administrative Code, CACFP Handbooks and any additional instruction or guidance issued by the Texas Department of Agriculture.
Made	Jared Greathouse
Second	Margaret DeVinney
Vote	Unanimous approval

**CACFP Handbook**

<https://squaremeals.org/Programs/ChildandAdultCareFoodProgram/CACFPPolicy&handbook.aspx>

**VIII. Title VI (Civil Rights) Regulation Motion**

By its vote, the Board of Directors affirms AGE’s commitment to complying with Title VI requirements. A copy of AGE’s Title VI Policy and Procedures is located in the office of the Deputy Director, and is available for review at any time.

Motion	To approve AGE’s commitment to complying with the Title VI policy.
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Made	Jared Greathouse
Second	Darby Armont
Vote	Unanimous approval

**IX. New Business**

**X. Conclude meeting at 1:10**

Motion	To approve adjournment of March meeting
Made	Ronnie Taylor
Second	Lina Supnet-Zapata
Vote	Unanimous approval

**Next meeting: Wednesday, July 29th, 11:30 am – 1:30pm, Video Conference**

Minutes submitted by Julia Menegay, Secretary