

INTRODUCTION

Monadnock Adult Care Center is a program of Monadnock Family Services and operates in accordance with all procedures and policies of the agency. The Title VI plan that the agency has designed has been augmented for the purpose of greater specificity in regards to the transportation portion of our programming.

COMMITMENT TO CIVIL RIGHTS

Monadnock Adult Care Center Title VI plan has been prepared to ensure that the level and quality of Monadnock Adult Care Center's transportation programming demand response services are provided in a nondiscriminatory manner and that the opportunity to access services are fair to MACC clients and community.

MACC operate all services without regards to race, color, sex, age, national origin, sex, age or disability in accordance with the Title VI of the Civil Rights Act. The contents of this program has been prepared in accordance with section 601 of the Title IV Civil Rights Act of 1964 and Executive Order 13116

(Improving Access to services for Persons with limited English Proficiency, and other statutes and authorities that prohibit discrimination in any federally assisted service or program.)

"No person shall, on 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 the federal assistance." - Civil Rights Act of 1964

Under the Civil Rights Act of 1964, and as a recipient of federal funding under the programs of the Federal Transit Administration (FTA) of the U.S. Department of Transportation (US DOT), MACC has an obligation to ensure that:

- ◆ The benefits of its bus services are shared equitably throughout the service area;
 - ◆ The level and quality of bus services are sufficient to provide equal access to all riders in its service area;
 - ◆ No one is precluded from participating in MACC's service planning and development process;
 - ◆ Decisions regarding service changes or facility locations are made without regard to race, color or national origin and
 - ◆ A program is in place for correcting any discrimination, whether intentional or unintentional.

GENERAL REQUIREMENTS

Notice to the Public

To make MACC riders aware of its commitment to Title VI compliance and their right to file a civil rights complaint MACC has presented the following information in English on its policies & procedures for riders and all drivers.

Your Civil Rights

MACC operates its programs and services without regard to race, color, religion, national origin, sex, disability, or age in accordance with Title VI of the Civil Rights ACT. Any person who believes they have been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with Monadnock Family Services or with The State of New Hampshire Department of Transportation Complaints Coordinator. Any such complaint must be put in writing and submitted to:

**Complaint Coordinator
Monadnock Family services
64 Main Street Ste.201
Keene NH. 03431**

**Complaints may also be filed with:
Title VI Coordinator
New Hampshire Department of Transportation
PO Box 483, 7 Hazen Drive
Concord NH. 03302-0483**

For more information on filing a complaint please contact Monadnock Adult Care Center @ 603-532-2427 Monday- Friday 8:00 am -3:00 pm or Monadnock Family Services Complaint Coordinator @ 603-357-4400. Monday-Friday 8:30 am-4:30pm,

Discrimination Complaint Procedure

MACC has established a process for riders to file a complaint under Title VI. Any person who believes that she or he has been discriminated against on the basis of race, color, religion, national origin, sex, disability, or age by MACC/ MFS may file a Title IV complaint by submitting a formal complaint as noted above. * Procedure can also be found in the Rider Manual, on the MFS website www.mfs.org or by calling Monadnock Adult Care Center director at 603-532-2427.

Alternative means of filing complaints, such as personal interview, a phone call or a taped request will be made available for a person with disabilities if unable to communicate their requests in writing or upon request.

Required Time to File Complaint

To allow to file first with the Agency and then externally with an appropriate outside agency or court, as the complainant chooses, any complaint to the Agency should be filed promptly and must be filed not later than one hundred eighty (180) calendar days after alleged discrimination occurred. If the complainant may still file externally within any applicable statute of limitations.

If a complaint is filed within the Agency and is filed externally during the same time, the external complaint supersedes the internal complaint filing. Accordingly, the Agency's complaint procedures will be suspended pending the outcome of the external complaint.

Step1-informal meeting with Department Head

The complainant and or the complainant's representative are encouraged to initiate the process by meeting with the agency department head of the service or facility where the alleged discrimination took place. The complainant should provide the basis of the complaint a9race, color, national origin) and the nature of the incident that led the complainant to feel that the discrimination was a factor.

The Department Head shall immediately notify Title VI coordinator. The department head shall, within ten (10) working days after receiving the complaint, reach a decision and communicate the decision to the complainant and the Title VI Coordinator.

Upon receipt of a complaint, the Title VI coordinator will determine jurisdiction. Complaints against the Agency involving federal funds will be forwarded to the appropriate state agency for proper pursuant to its procedure.

Step 2- Formal Complaint to Title VI Coordinator

If the complaint is not resolved at Step1, or if the complaint is not first brought to the department head, a written complaint shall be filed with the Agency's Title VI Coordinator. The complainant should be complete the Monadnock Adult Care Center Title VI complaint form. The coordinator shall notify the program department head of the formal complaint and initiate an investigation immediately. The complaint coordinator will also report the complaint to the New Hampshire Department of Transportation.

The internal investigation shall completed within twenty (20) workdays of receipt of the complaint, at which time the Coordinator will inform the complainant in writing of its disposition, including any findings of fact and any actions to be taken.

Disposition of Complaints

Sustained Complaints- If the complaint is substantiated, this policy and procedure prohibiting discrimination will be reviewed with the offender. Appropriate disciplinary action and/or training will be taken pursuant to the Agency's disciplinary procedures.

Un-sustained Complaints- If there is insufficient evidence to either prove or disprove the allegation (s), both parties to the complaint will be informed of the reason(s) for this disposition.

Unfounded Complaints- If it is determined that an act reported pursuant to this policy/procedure did not in fact occur, a finding of "unfounded" shall be found.

Exonerated Complaints- If it is determined that an act reported pursuant to this policy/procedure did in fact occur, but was lawful and proper within the guidelines established herein, a finding of "exonerated" shall be made.

Review Appeal

If the complaint is not satisfied with the resolution, an appeal process is available. An appeal request for review of a determination of unlawful denial of access or accommodation to public transportation must be filed, in writing, within thirty (30) days of the resolution of the complaint, with the Title VI Coordinator.

The written appeal must include the complainant's name, address, and telephone contact number. A statement of reason(s) why the complainant believes the denial of the complaint was inappropriate is recommended.

The Title VI Coordinator will set a mutually agreed-upon time and place for the review process with the complainant-appellant and/or representatives and the Agency Manager or designee within thirty (30) days of the request. The complainant-appellant may submit documents or other information to be included with the record and considered in the review process. A record of the review will be kept by the Agency.

A complaint's right to a prompt and equitable resolution of the complaint will not be impaired by the complainant's pursuit of other remedies. Use of this complaint procedure is not a prerequisite of other remedies.

Complaint Log

The Coordinator will maintain a Title VI complaint Log to show identifying information type, and status of each complaint filed, including those filed under Step1 of this procedure. When any investigation is conducted, the Coordinator will keep a copy of the report on permanent file.

Limited English Proficiency Policy

The Agency is committed to providing quality services to all citizens, including those who do not speak English as their primary language, and who have limited ability to read, speak, write, or understand English. These individuals may be considered Limited English Proficient, or "LEP," and may be entitled to language assistance.

As a recipient of federal funding, the Agency must take reasonable steps to ensure meaningful access to its programs and activities by LED persons. The federal government recommends analyzing the following four factors to determine the level and extent of language-assistance measures required within the grantee's area of responsibility.

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or grantee.
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 program to people's lives: and
4. The resources available to the grantee/recipient or agency, and costs.

The intent of this policy is to find balance that ensures meaningful access by LEP persons to official services while not imposing undue burdens on the Agency or department. Specific steps to be taken, in terms of translation or language interpretation, will depend on the situation at the time, from coordination with LEP individuals and the organizations that serve them and from analysis of the Agency of Murfreesboro's existing resources and the costs of providing language assistance.

PUBLIC PARTICIPATION PLAN (PPP)

Key Principles

Monadnock Adult Care Center provides rides to elderly adults and individuals with disabilities, therefore, (MACC) Public Participation Plan (PPP) has been prepared to ensure that no one who meets the basis eligibility requirements is precluded from participating in MACC's service planning and development process. It ensures that:

- Potentially affected community members will have an appropriate opportunity to participate in decisions about a proposed activity that will affect their environment and/or health;
- The **public's contributions** can and will influence MACC's decision making;
- . The concerns of all participants involved will be considered in the decision-making process
- MACC will seek out and facilitate the involvement of those potentially affected.
- No person will be precluded from participating in MACC's service planning and development in regards to transportation based on age, sex, color, religion, disability, or national origin.
- There will be signage on each bus encouraging public involvement towards the betterment of our programming services
- Our clients and our community riders will be surveyed each year regarding our offered services.

Objectives of the Public Participation Plan

Monadnock Adult Care Center's Public participation plan is based on the following objectives:

- **Flexibility** - The engagement process will accommodate participation in a variety of ways and be adjusted as needed.
 - **Inclusiveness** - MACC will proactively reach out to and engage people with low incomes, minority and LEP populations who are eligible for services offered in the MACC service area.
 - **Respect** - All feedback will be given careful and respectful consideration.
- **Proactive and Timeliness** - Participation methods will allow for early involvement and be ongoing.
- **Clear, Focused and Understandable** - Participation methods will have a clear purpose and use for the input, and will be described in language that is easy to understand.
- **Honest and Transparent** - Information provided will be accurate, trustworthy and complete.
- **Responsiveness** — MACC will respond and incorporate appropriate public comments into transportation decisions.
- **Accessibility** — in regards to our community shuttle service program, MACC will hold an informational meeting at each Senior Housing unit in the area that is involved in our shuttle program to best identify any unmet need in an effort to better serve this population.

MACC will use its public participation plan when considering major modifications in our programming / transportation when considering the service routes, hours, and other service/transit planning projects when:

- Trip reservation policy is reduced or increased;
- The service area is changed;
- If a route is established;
- If a route is proposed for elimination;
- Considering the total discontinuance of service on any given day when service is currently offered;
- For minor schedule and service changes not rising to the level of those above such as Inclement weather cancellation.

MACC'S PUBLIC PARTICIPATION PROCESS

Outreach Efforts — Alerting Riders and Encouraging Engagement: We communicate with our current riders through direct mail and phone calls. In regards to our Shopping Shuttle we have one-point person at each establishment to field questions and to disseminate information for riders at their living facility. * Bus drivers will also from time to time put flyers on each seat of the bus to further engage the public.

1. A service change proposal is developed internally or as a result of public comment;
2. Proposals are reviewed by director and drivers.
3. A Title VI is conducted: MACC
5. A Title VI review of the proposal is conducted;
 6. If a request is for a reasonable accommodation.... Reasonable Accommodation protocol will be referenced in rendering a decision;
 7. Letters or Phone calls are sent/ placed to all MACC Families/Clients of any transportation deviations that will impact delivery of Transportation Services.
 8. In regards to the Community Shopping Shuttle Program, the point person will be notified of any deviation to scheduled community trips. They will then disseminate all information via phone tree messaging or by posting a notice in their common living space at their individual living establishments which will inform riders of any changes to scheduled Community Trips.

MACC Mediums of Communication

- Print- Newspapers and periodicals
- Announcements on —board busses
- Phone tree messaging
- MFS Website for Title VI Policy and Reasonable Accommodation Policy www.mfs.org
- Seat Drop flyers which will provide riders with details of any changes.

Addressing Comments

The incorporation of Public Comments into Decision Making

All comments received through the public participation plan are given careful, thoughtful consideration. The Clients at MACC their families, and the community are encouraged to make comments, suggestions that may improve the delivery of services. All comments will be assembled into a document for monthly review by the transportation team at MACC.

Transportation Review Committee

MACC decisions regarding day to day function of the transportation program is overseen by the MACC Director. Any suggestions to revise or augment our transportation system will be reviewed by the transportation team comprised of the MACC director, drivers and office support staff. * If there is a situation that rises to the level of a Title VI complaint the situation would then elevate to the level of the complaint officer, CEO of MFS and the Board of Directors. * MACC clients and Community Riders are surveyed annually and transportation is a component of the survey.

**Monadnock
Adult Care
Center**

**11.411(603) 532-2427
MONADNOCK**

**FAMILY
SERVICES**

Inspiring hope since 1905

22 North Street
Jaffrey, New Hampshire 03452

(603) 532-2429 Fax

[Email: adultcare@mfs.org](mailto:adultcare@mfs.org)

**Monadnock Adult Care Center
Title VI
Complaint Form**

If you believe you have received discriminatory treatment by the MACC Transportation Program on the basis of Age, Race, Sex, Color, National Origin, Religion or Disability, you have the right to file a formal Title VI complaint form.

Monadnock Adult Care Center/Monadnock Family Services analyzes complaint allegations for possible Title VI violations. If deficiencies are identified, the claim will be processed in accordance with Monadnock Family Services Title VI protocol.

SECTION I

Name _____

Address _____

Telephone Number (Home) _____ (Work) _____

E-Mail Address: _____

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Monadnock **MONADNOCK**
Al1111Teattl **FAMILY SERVICES**
Center *Inspiring hope since 1905*

Are you Filing this complaint on your own behalf? Yes _____ NO _____
(if you answered "yes" to this question, go to section III.)

If the answer is "no" please supply the name and relationship of the person
for whom you are complaining: _____

Please explain why you have filed on someone's behalf

Please confirm that 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
applies):

- Race
- Color
- National Origin

Date of Alleged Discrimination Month, Day, Year _____

Explain as a clearly as possible what happened and why you believe you
were discriminated against. Describe all persons who were involved.
Include the name and contract information of the person (s) who
discriminated against you (if known) as a well as names and contact
information of any witnesses. If more space is needed, please use the
back of this form.

SECTION IV

Have you previously filed a Title VI Complaint with MFS / MACC?

- YES
- NO

SECTION V

Have you filed this form with any Federal, State, local agency or with any Federal or State court?

If yes, please check all that apply

- Federal Agency _____
- Federal Court _____
- State Court _____
- State Agency _____
- Local Agency _____

(Note: The above information is helpful for administrative tracking purposes. However, if litigation is pending regarding the same issue, we will defer to the decision of the court.)

May we release a copy of your complaint to the New Hampshire Department of Transportation (NHDOT) Yes _____ No _____

May we release your identity to the NHDOT? Yes _____ No _____

You may also file a Title VI Complaint with The NH DOT. Please visit the NH Department of Transportation Web site for more information.

(Note: We cannot accept your complaint without a signature)

Signature _____ Date _____

Please submit to:

Monadnock Family Services
Title VI Coordinator
64 Main Street
Keene NH, 03431

