

NW CO Center for Independence

Title VI Plan



“Empowerment through Advocacy, Peer Support and Education.”

Adopted 1/8/2021

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PART I.

General Title VI Requirements for all FTA Subrecipients

BACKGROUND

NWCCI serves Routt, Moffat, Rio Blanco, Grand, and Summit Counties. Our main office is located in Steamboat Springs. We have satellite offices in Moffat (Craig), Grand (Granby), and Summit (Dillon) Counties. NWCCI has 19 employees and serves about 300 people per year. NWCCI provides transportation with a week lead time to schedule rides. The majority of our transportation services are dedicated to assisting people with accessible transport to medical appointments within the region and to specialist appointments on the front range and Grand Junction areas. We have 4 vehicles that are all accessible for wheelchair use and are the only operation in the region providing accessible transportation for people with disabilities, particularly those who use mobility devices.

NOTICE TO THE PUBLIC

NWCCI 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 NWCCI in accordance with the organization's Grievance Procedure policy, which is provided to everyone as part of our intake process for engaging with consumers and available to the public through our website or upon request. The NWCCI Title VI plan is posted on our website (www.nwcci.org), with hard copies posted in offices, kept in vehicles and available upon request.

For more information on NWCCI's civil rights program, and the procedures to file a complaint, contact 970-871-4838, (TTY 711); email joy@nwcci.org; or visit our main office at 1855 Shield Dr #300 Steamboat Springs, CO 80487. For more information, visit www.nwcci.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 or alternative format, contact 970-871-4838.

COMPLAINT PROCEDURES AND FORM

NWCCI's Title VI Complaint Procedure and Complaint Form can be found at www.nwcci.org

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by NWCCI may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form. NWCCI investigates complaints received no more than 180 days after the alleged incident. NWCCI will process all completed and submitted complaints in accordance with the procedure as presented.

Once the complaint is received, NWCCI 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.

The Authority has 15 days to investigate the complaint. If more information is needed to resolve the case, the Authority may contact the complainant. The complainant has 15 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 15 business days, the Authority 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 COMPLAINTS, INVESTIGATIONS AND LAWSUITS

NWCCI has no Title VI complaints

PUBLIC PARTICIPATION PLAN

NWCCI regularly communicates with local organizations about the availability of transportation services. These organizations include clinics, hospitals, Department of Human Services, the Veterans Administration, food banks, thrift stores, faith-based organizations, healthcare providers, Regional Accountable Entities, educational partners, civic organizations and other nonprofit organizations. NWCCI focuses specifically on reaching people with disabilities and people with low income to avail our transportation services.

NWCCI employs staff who communicate fluently in Spanish as well as American Sign Language. The overwhelming majority of NWCCI staff have a variety of permanent disabilities. NWCCI is strategically positioned to ensure we are connecting with the Deaf community, those with Brain Injuries and all manner of diverse people with disabilities for whom our transportation services augment the goal to live healthy and safe at home in the community.

LANGUAGE ASSISTANCE PLAN

NWCCI provides communication assistance to accommodate passengers for whom traditional English language is inaccessible, including sign-language, accessible language for people with intellectual, cognitive or developmental disabilities, and interpreter services for those who do not communicate using the English language. NWCCI employs deaf staff, paid sign-language interpreters and personnel fluent in Spanish for in-house assistance with accessible communication. NWCCI has established a close working relationship with Integrated Communities as another means for serving people with limited English proficiency and providing translation services.

The frequency of interactions related to language assistance needs as described vary, averaging approximately one request a month.

NWCCI transportation program is designed to serve people with permanent disabilities. NWCCI transportation is primarily structured to provide non-emergency medical transportation. We work with

individuals to identify options and develop plans to address transportation needs in the short, medium and long term. NWCCI coordinates with transportation partners including Steamboat Springs Transit, Colorado Department of Transportation, is a member of the Colorado Association of Transit Agencies and benefits from our collaboration with strategic partnerships. NWCCI operates an on-demand scheduling system instead of an on-call or fixed route. Recently we have expanded services to include transportation to include non-medical transportation for errands such as trips to the pharmacy and grocery store in Routt and Moffat Counties.

The majority of NWCCI outreach is conducted through direct interaction and collaboration with partner organizations, including active and ongoing engagement in local, regional, statewide and national meetings where we provide updates on our programs and activities. NWCCI resources, services, audits, board minutes and all manner of public information can be found on our website. Occasionally, NWCCI will engage in advertising and produce flyers for public distribution with regard to our transportation program, particularly related to expansion, development and roll out of new services. The costs associated with outreach include producing and distributing resource materials and information, staff wages, supplies, advertising and outside vendor services.

NWCCI staff are trained and practiced with inclusive formatting for person-centered communication, going beyond American Sign Language and Spanish language interpretation in an effort to incorporate important cultural competency aspects of language accessibility.

NWCCI provides notice of alternative formats and options for communication during the initial meeting with a consumer while reviewing mutual rights and responsibilities. The NWCCI website and marketing materials, such as our brochure, also include notice of availability of accommodations upon request.

Monitoring of the plan is conducted by the NWCCI Transportation Manager. The plan is reviewed annually to ensure compliance and updated at least annually to adapt to changing conditions of service delivery.

Employees are trained to provide accommodations upon request. For Spanish interpretation NWCCI staff will contact Integrated Communities to provide the service. For American Sign Language we connect with Rural Interpreting Services Program (RISP) to get an interpreter or connect riders with our deaf coworker Staci Nichols.

PLANNING AND ADVISORY BOARDS - NWCCI does not have any such committees.

FACILITY LOCATION EQUITY ANALYSIS - NWCCI has not planned to construct, expand, or purchase a facility in the last 3 years. NWCCI does not plan to construct, expand or purchase a facility in the next 2 years.

COPY OF GOVERNING ENTITY APPROVAL - See Appendix B, NWCCI Board Meeting Minutes from March 24, 2021.

APPENDICES

Appendix A: Title VI Complaint form

APPENDIX A

NWCCI Title VI Complaint Form

Section I:			
Name:			
Address:			
Telephone (Home):		Telephone (Work):	
E-Mail Address:			
Accessible Format Requirements ?	Large Print		Audio Tape
	TDD		Other
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 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 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. _____ _____ _____ _____			
Section IV			
Have you previously filed a Title VI complaint with this agency?		Yes	No
Section V			

Michael Toothaker, Board Vice President

Ruth Armbruster, Board Secretary

Dan Bonner, Board Treasurer

Susan Waldron, Board Member

Dr. Chris Ebert, Board Member

Bruce Roemmich, Board Member

Staff Absent: Ruth Armbruster, Board Member

Staff Present: Ian Engle, Executive Director

1:35 PM – Meeting is called to order by NWCCI Board President, Craig Kennedy. The meeting is being held via Google Meets videoconference.

1:38 PM - Michael moves to accept the 02/24/2021 Board Meeting Minutes as written, Susan seconds, Board votes unanimously in favor of the motion. Bruce abstains

1:40 PM – Ian reviews Development Report and states all is going well thanks to efforts by Rachele.

1:41 PM – Ian mentions that he and Craig did not have time to get together about the Strategic Plan and proposes tabling that item on the agenda for now, the board agrees.

1:44 PM – Ian reviews finances and proposes considering provision of an agency match (up to 3%) for employee retirement funds in the organization's budget starting next fiscal year. Bruce confirms that the one-month operating reserve is still a priority over anything else. Ian also mentions interest in formally requesting forgiveness of the outstanding debt to the state, which was inherited from our former organization. Dan asks for more information about the debt and the circumstances surrounding it. Ian told the story and there was discussion from the board. Susan and Michael filled in some details they remembered. Dan mentions we need to start getting tougher about this debt as technically it is not OUR debt. Dan also says maybe we should consider refusing to pay the debt.

Bruce agrees and insists we need to make it clear that after the next audit on April 5th we will push for this debt to be forgiven. Dan and Ian point out that we are in great shape other than this one red mark on the balance sheet.

1:54 PM - Ian shares the balance sheet and points out where the CDLE debt lives. Dan says we need to share Chris Catterson's finding with the State that there is no longer a "Going Concern" on our audit. Ian mentions this also looks good to funders and is an advantage for Rachelle (Development Coordinator).

1:57 PM - Ian says he has sent the Audit over to Clark Davidson who will file our federal 990 tax return for the corresponding fiscal year (FY 19-20).

1:59 PM – Ian talks about Rollover Authority as a request granted by the Joint Budget Committee of the Colorado State Legislature. The State is now allowing organizations to roll over unspent state general funds to the following year. Ian checked with Meagan and we should have no problem spending our State and Federal funding by the end of this fiscal year. Last fiscal year was complicated and harder to spend that money due to PPP Loans coming in and needing to be spent during the last quarter, even though we worked it out and were able to invest in new computers and other hard goods, having the authority and permission to rollover state contract funds into the following fiscal year is a good option going forward.

2:02 PM – Ian reviews our transportation program. We have received extra funds from CDOT (\$15,000) that need to be spent by May 1st. Because of this we are offering a driver and an accessible vehicle to be available for those who are be eligible for vaccines and called on short notice when there is a no show. He also discussed opening up our program more to help people with running errands and keeping people connected through COVID.

2:06 PM – Ian shared Mike Bertram's programming report and states we are getting busy again and back to pre-COVID numbers. He also shares that we are proud of the fact we are really good at connecting with clients and providing high quality customer service as opposed to the false impression of a large quantity of open Consumer Service Records.

2:09 PM – Ian talks about Insurance rates currently being explored, including contracts through new provider networks that offer better quality and less expensive plans. NWCCI management are researching the providers and services offered through plans available in our area and comparing rates. The

insurance company is presenting and taking questions at the next NWCCI staff meeting. Ian also mentioned that employees have indicated consensus agreement around being happy with these savings and not asking the board to pay a higher percentage. Craig states he would rather not have the board increase the current agency coverage percentage and we may need to keep more in reserve in case insurance rates skyrocket again next year.

2:15pm – Ian reviews our Title VI ADA plan as requested by the Colorado Department of Transportation and required by the Federal Transit Authority. This plan is for compliance with accessible and inclusive communication requirements of the Americans with Disabilities Act. The board discussed the document and points out a few grammatical errors. Dan Bonner makes a motion to approve the document. Michael Toothacher seconds the motion. Board votes unanimously to approve the document.

2:21 PM – Bruce asks about the Website. Ian reports that Ian White has taken over this and is doing well so far. He is picking up skills and abilities related to his new duties and responsibilities quickly. He has updated the Website by removing old staff and adding new staff. If he needs help, he asks for it, we bought Ian White a new computer and we are proud of the work being done.

2:24 PM – Ian warns there is still a lot of work to do and doesn't want people to become complacent. We still have work to do around the Web site, with the equipment loan program, supply and equipment inventory and with our annual fundraising campaign.

2:32 PM – Board schedules next meeting for Wednesday the 28th of April 2021 at 1:30 via video conference.

2:35 PM – Craig motions to adjourn, Michael seconds, motion passes. Meeting is adjourned.