

***Federal Transit Administration  
Title VI Program***  
**Powell Senior Citizens Ago-Go, Inc.**

**January 2024 Approved**

(Plan expires January 2027)



## Title VI Plan Table of Contents

The Powell Senior Citizens Ago-Go, Inc. Title VI plan includes the following elements:

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**Section 1: Title VI Plan Approval**

Title VI Plan Adopted on: January 23, 2024

Adopted by: Powell Senior Citizens Ago-Go, Inc.  
Board of Directors

Signature(s): \_\_\_\_\_

Approval:

Board Resolution  
Of  
Powell Senior Citizens Ago-Go, Inc.

We the undersigned, being Directors of the Powell Senior Citizens Ago-Go, Inc. organized and existing under the laws of Wyoming and having its principal place of business at 248 North Gilbert Street, Powell, WY 82435, hereby certify that the following is a true and correct copy of a resolution duly adopted at a Board of Directors meeting duly held and convened on January 23, 2024 at which a quorum of the Board of Directors was present and voting throughout that such resolution has not been modified, rescinded or revoked and is at present in full force and effect.

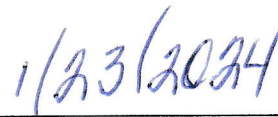
Therefore, it is resolved,

That the Powell Senior Citizens Ago-Go, Inc. has adopted and approved this Title VI Program dated January 2024, for the next three (3) years.

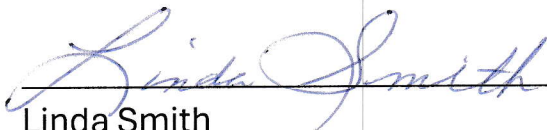
**DIRECTORS:**



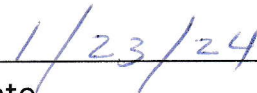
Linda Dalton  
Executive Director



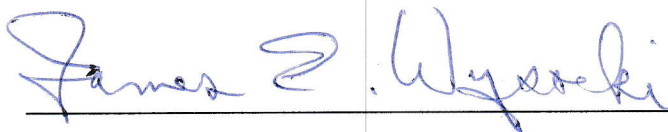
Date



Linda Smith  
President



Date



James Wysocki  
Vice President



Date



*Steve Martin*

Steve Martin  
Treasurer

*1/23/24*

Date

*Linda Graff*

Linda Graff  
Secretary

*1/23/24*

Date

*Ben Borch*

Ben Borch  
Officer

*1/23/24*

Date

*Melissa Clark*

Melissa Clark  
Officer

*1-23-24*

Date

*Stan Lundberg*

Stan Lundberg  
Officer

*1-23-24*

Date

*Wes Vining*

Wes Vining  
Officer

*1-23-24*

Date

*Trevon Dunn*

Trevon Dunn  
Officer

*1-23-24*

Date

## **Section 2: Title VI Policy Statement**

### **Policy Statement**

The Powell Senior Citizens Ago-Go, Inc., operating as a public transit provider, as a recipient of Federal Transit Administration (FTA) grant dollars either directly from FTA or through the Wyoming Department of Transportation (WYDOT), will comply with the Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), the U.S. Department of Transportation implementing regulations, FTA Circular 4702.1B, and WYDOT Public Transportation requirements as specified in Master Grant Agreement, and State Management Plan. The Powell Senior Citizens Ago-Go, Inc. operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act.

### **Section 3: Title VI Notice to the Public**

## **Title VI Notice to the Public**

### **Notifying the Public of Rights Under Title VI**

### **Powell Senior Citizens Ago-Go, Inc.**

- The Powell Senior Citizens Ago-Go, 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 any unlawful discriminatory practice under Title VI may file a complaint with the Powell Senior Citizens Ago-Go, Inc..
- For more information on the Powell Senior Citizens Ago-Go, Inc.'s civil rights program or Title VI obligations, the procedures for, or to file a complaint, please contact:

**Linda Dalton, Title VI Coordinator**

**307-754-4223**

director@powellseniorcenter.com

Or visit our administrative office at

248 North Gilbert Street, Powell, WY 82435

For more information, visit **[www.powellseniorcenter.com](http://www.powellseniorcenter.com)**

- For transportation-related Title VI matters, a complaint may also be filed directly with WYDOT's Office of Civil Rights to: Title VI Coordinator, 5300 Bishop Blvd., Cheyenne, WY 8200; via phone: 307-777-4457; or email: DOT-civilrights@wyo.gov

or to

- Federal Transit Administration, Office of Civil Rights, Director  
East Building, 5<sup>th</sup> Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC, 20590.
  - If information is needed in another language, contact 307-754-4223.
  - Si se necesita información en otro idioma, comuníquese con 307-754-4223

The **Powell Senior Citizens Ago-Go, Inc.** Notice to the Public is posted in the following locations:

1. On our website: [www.powellseniorcenter.com](http://www.powellseniorcenter.com)
2. In each of our transportation vans
3. In our dining room (248 N. Gilbert St., Powell, WY 82435)

## **Section 4: Title VI Complaint Procedure**

Any individual, group of individuals or entity that believes they have been discriminated against on the basis of race, color, or national origin by the Powell Senior Citizens Ago-Go, Inc. may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form.

If the complainant is unable to reduce the complaint to writing, please contact the Title VI Coordinator using the information below, and a staff member will help dictate the complaint or provide other necessary assistance.

Any individual having filed a complaint or participated in the investigation of a complaint shall not be subjected to any form of intimidation or retaliation. Individuals who have cause to think that they have been subjected to intimidation or retaliation can file a complaint of retaliation following the same procedure for filing a discrimination complaint.

A complaint must be filed with the Powell Senior Citizens Ago-Go, Inc. no later than 180 days after the following:

1. The date of the alleged act of discrimination; or
2. The date when the person(s) became aware of the alleged discrimination; or
3. Where there has been a continuing course of conduct, the date on which that conduct was discontinued of the latest instance of the conduct.

Once the complaint is received, the Powell Senior Citizens Ago-Go, Inc. will review it to determine if our office has jurisdiction. A copy of each Title VI complaint received will be forwarded to the agency's Title VI Coordinator. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office.

The Powell Senior Citizens Ago-Go, Inc. has 60 days to investigate the complaint. If more information is needed to resolve the case, the Powell Senior Citizens Ago-Go, Inc. may contact the complainant requesting further information. The complainant has 45 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 45 business days, the Powell Senior Citizens Ago—Go, Inc. can administratively close the case.



After the investigator reviews the complaint, the agency will issue one of two (2) 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.
- ✓ A letter of finding (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 it must direct the appeal back to the agency. The complainant has 30 days after receipt of the closure letter or the letter of finding to do so. The appeal will be investigated and decided by a separate party than the Title VI Coordinator (or other official who issued the initial decision). To submit an appeal, write a detailed letter listing the reasons for an appeal and send to the contact person and address listed below.

Written Title VI Complaints, or any questions regarding Title VI protections, should be forwarded to:

**Linda Dalton, Executive Director**

**307-754-4223,**

Email: [director@powellseniorcitizens.com](mailto:director@powellseniorcitizens.com);

Or visit our administrative office at

248 North Gilbert Street, Powell, WY 82435.

A person may also file a complaint directly with WYDOT's Office of Civil Rights at: Title VI Coordinator, 5300 Bishop Blvd., Cheyenne, WY 8200; via phone: 307-777-4457; or email: [DOT-civilrights@wyo.gov](mailto:DOT-civilrights@wyo.gov)

Or

Federal Transit Administration, Office of Civil Rights, Director  
East Building, 5<sup>th</sup> Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.

If information is needed in another language, please contact **(307) 754-4223**.

*Si necesita información en otro idioma, por favor llame **(307) 754-4223**.*

**Section 5: Title VI Complaint Form**

**Powell Senior Citizens Ago-Go, Inc.  
Title VI Complaint Form**

<b>Section I:</b>				
Name:				
Address:				
Telephone (Home):			Telephone (Work):	
E-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 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
<b>Section III:</b>				



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

**Title VI:**  Race     Color     National Origin

**Other (specify):** \_\_\_\_\_

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 Civil Rights related complaint with this agency?	Yes	No
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**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: \_\_\_\_\_
- Federal Court \_\_\_\_\_                       State Agency \_\_\_\_\_
- State Court \_\_\_\_\_                       Local Agency \_\_\_\_\_

If marked Yes in Section V, please provide information about a contact person at the agency/court where the complaint was filed.

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

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

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

<b>Address:</b>	
<b>Telephone:</b>	
<b>Section VI</b>	
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 and date required below**

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

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

**Powell Senior Citizens Ago-Go, Inc.  
Linda Dalton, Title V1 Coordinator  
248 North Gilbert Street  
Powell, WY 82435  
307-754-4223  
director@powellseniorcenter.com**

**Section 6: List of Title VI Investigations, Complaints and Lawsuits**

The **Powell Senior Citizens Ago-Go, Inc.** maintains a list or log of all Title VI investigations, complaints, and lawsuits, pertaining to its transit-related activities.

**Check One:**

- There have been no investigations, complaint and/or lawsuits filed against us since the last plan submission.
- There have been investigations, complaints and/or lawsuits filed against us. *See list below. Attach additional information as needed.*

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



## **Section 7: Public Participation Plan**

### **Powell Senior Citizens Ago-Go, Inc.'s *Public Involvement Philosophy***

Powell Senior Citizens Ago-Go, Inc. welcomes and values public involvement. WYDOT and its recipients believe that well-designed, proactive public involvement improves its planning and policy efforts and ultimately leads to better decisions, better projects, and maximized, long-term public benefits. Creating long-term, sustainable systems requires our agency to embrace outside skills and knowledge, including input from the public. Advantages of enhanced public involvement include:

- Increased public collaboration. Citizen collaboration on projects benefits our agency's processes and outcomes, promoting public participation and respectful, productive dialogue.
- Decisions that better reflect diverse interests. Consulting with all identifiable interests helps Powell Senior Citizens Ago-Go, Inc. better understand and reflect the full range of community values and livability standards.
- Efficient transportation decision implementation. Early public involvement fosters better decision making and reduces costly project plan revisions and change orders.
- Enhanced agency credibility. Increased public involvement results in more meaningful and better interactions between Department personnel and customers. This interaction aids everyone. The agency better understands public concerns, and customers gain an appreciation of the agency and its responsibilities.
- Powell Senior Citizens Ago-Go, Inc. proactively involves the public in addressing transportation issues. The agency communicates its mission and goals to the widest audience possible and considers feedback received from transportation stakeholders and the public.

The agency embraces several specific goals:

- Provide open and continuous communication to incorporate public input into decision-making and inform the public of planning, program functions, project activities, designs, and construction.
- Implement a public involvement strategy to identify and use agency resources to inform the public of our activities and receive public input. The strategy will establish levels (based on the nature and complexity of the activity) for communicating with transportation stakeholders and the public.
- Consult with local governments in identifying transportation needs, coordinating projects, and selecting viable solutions.
- Respond quickly and transparently to concerns expressed about agency activities and educate the public about transportation programs and issues.
- Review and update the public involvement strategy and process as needed, continuously evaluate public outreach activity effectiveness, and use the results to improve the program.
- Ensure minorities and low-income populations have opportunities to participate in the public involvement process.
- Foster internal communication and training to promote public involvement process understanding and implementation.

### **Strategies and Desired Outcomes**

To promote inclusive public participation, the Powell Senior Citizens Ago-Go, Inc. will employ the following strategies, as appropriate:

- ✓ Provide for early, frequent and continuous engagement by the public
- ✓ Select accessible and varied meeting locations and times
- ✓ Employ different meeting sizes and formats
- ✓ Use social media in addition to other resources to gain public involvement
- ✓ Use radio, or newspaper ads on stations and in publications that serve LEP populations.

- ✓ Expand traditional outreach methods by visiting ethnic stores/markets and restaurants, community centers, libraries, faith-based institutions, local festivals, etc.

In addition to these general strategies, Powell Senior Citizens Ago-Go, Inc. has also employed these specific strategies or activities:

- Our Local High School teaches Spanish and French, so we can call the teacher (Brandon Preator) to help us with those languages
- One of our transportation drivers speaks Spanish
- Our local college (Northwest College) has an International Program which covers most of the languages

**Public Outreach Activities**

The public outreach and involvement activities conducted by the Powell Senior Citizens Ago-Go, Inc. since the last Title VI Program submission are summarized in the table below.

Specific Public Participation activities are listed in the table below:

<b>Event Date</b>	<b>Powell Senior Citizens Ago-Go, Inc. Staffer(s) or Department</b>	<b>Activity</b>	<b>Communication Method (Public notice, posters, social media)</b>	<b>Notes</b>
October 2022	Executive Director	Public talk with Powell Rotary Club	Presentation about the services we provide	There were two foreign students at the talk. The Rotary Club provided interpreters.
October 2023	Executive Director	New Brochure distribution	Agency Brochures	These were given to all our partner organizations
November 2023	Executive Director	Medicare Open Enrollment and application for extra help	One on One meeting	The client struggles with English. I had a staff member who speaks Spanish interpret for both of us.




## **Section 8: Four Factor Analysis and LEP Data**

### **What does it mean to be Limited English Proficient (LEP)?**

LEP individuals do not speak English as their primary language and therefore have a limited ability to read, write, speak, or understand English. Many LEP persons are in the process of learning English and may read, write, speak, and/or understand some English, but not proficiently. LEP status may be context-specific – an individual may have sufficient English language skills to communicate basic information (name, address etc.) but may not have sufficient skills to communicate detailed information in English.

### **Background**

Federal law prohibits discrimination based on national origin. National origin discrimination includes discrimination based on a person's inability to speak, read, write or understand English. Recipients of Federal funds must provide meaningful access to LEP individuals.

On August 11, 2000, Executive Order 13166, titled, "Improving Access to Services by Persons with Limited English Proficiency," was issued. Executive Order 13166 requires Federal agencies to assess and address the needs of otherwise eligible persons seeking access to federally conducted programs and activities who, due to LEP cannot fully and equally participate in or benefit from those programs and activities. Section 2 of the Executive Order 13166 directs each Federal department or agency "to prepare a plan to improve access to...Federally conducted programs and activities by eligible LEP persons...."

## **Framework for Deciding when Language Services are Needed**

Powell Senior Citizens Ago-Go, Inc. will take the following steps to ensure meaningful access to its programs, services, and activities for LEP individuals in a manner that balances the following four factors.

### **FOUR-FACTOR ANALYSIS**

The Four Factor Analysis is a local assessment that considers:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by the agency;
2. The frequency with which LEP persons come into contact with the agency's services and programs;
3. The nature and importance of the agency's services and programs in people's lives; and
4. The resources available to the agency for LEP outreach, as well as the costs associated with that outreach.

#### **Factor One: The number or proportion of LEP persons eligible to be serviced or likely to be encountered by Powell Senior Citizens Ago-Go, Inc.**

The first step in determining the appropriate components of a Language Assistance Plan is understanding the proportion of LEP persons who may encounter our agency's services, their literacy skills in English and their native language, the location of their communities and neighborhoods and, more importantly, if any are underserved as a result of a language barrier.

To do this, the agency evaluated the level of English proficiency and to what degree people in its service area speak a language other than English and what those languages are. Data for this review is derived from the United States Census and the American Community Survey. The most recent data available for the state were the ACS 2018-2022 five-year estimates.

*Service Area Overview*

Powell Senior Citizens Ago-Go, Inc. service area encompasses Powell, Ralston and Garland. Home to 6,478 (2022) population of service area people spread over 10 square miles. The service area’s population speaks 3 LEP languages. However, the overall numbers of residents who speak English ‘less than very well’ are very low. Of the total service area population of 6,478 residents, only 126 or (2.0%), report speaking English less than very well. A breakdown of the language groups, and those speaking English less than very well, are:

<b>Total population of Powell Senior Citizens Ago-Go, Inc'.s Service area:</b>	<b>6,478</b>	
<b>Language Group</b>	<b>Number of people who speak the language and English less than very well</b>	<b>Percentage of people who speak English less than very well</b>
<b>Spanish</b>	<b>74</b>	<b>1.14%</b>
<b>Other Asian and Pacific Island</b>	<b>49</b>	<b>0.76%</b>
<b>Other and unspecified languages</b>	<b>3</b>	<b>0.05%</b>

<https://data.census.gov/cedsci/> Table C16001

*The Safe Harbor Provision*

The U.S. Department of Transportation (U.S. DOT) has adopted the U.S. Department of Justice’s Safe Harbor Provision. This provision outlines circumstances that can provide a “safe harbor” for U.S. DOT recipients (and sub-recipients) regarding translation of vital documents. Specifically, if a recipient provides written translation of vital documents for each LEP group that constitutes the lesser of 1,000 persons or five percent (5%) of the total population eligible to be served or likely to be affected or encountered, such action is



considered strong evidence of compliance with the recipient's written translation obligations.

The Safe Harbor Provision only applies to the translation of written documents. It does not affect the agency's requirement to provide meaningful access to LEP individuals through oral language services.

A vital document is any document that is critical for ensuring meaningful access to the recipients' major activities and programs by beneficiaries generally and LEP persons specifically. Whether or not a document (or the information it solicits) is "vital" may depend upon the importance of the program, information, encounter, or service involved, and the consequence to the LEP person if the information in question is not provided accurately or in a timely manner.

#### *Designation of Vital Documents*

Based on the limited population of Spanish, Arabic, Asian and Pacific Island who speak English less than very well, no languages meet the Safe Harbor Threshold in our service area. The agency is therefore not designating any vital documents at this time. However, any unmet language needs will still be met as described in the Language Access Plan, below.

#### **Factor Two: The frequency with which LEP persons come into contact with Agency services and programs.**

We have one client who struggles with English. Her choice of language is Spanish. When she needs a ride or any assistance, we send our driver who speaks Spanish, or we have him available to interpret for us. None of the Powell Senior Citizens Ago-Go Staff has encountered any other language to date. Each employee has an "I Speak" card so that if or when it happens, we will be able to identify the language and either contact the College International Program Director or we can use the "Translate" icon on our I-Phones.

#### **Factor Three: The Importance of the Agency's Service to People's Lives**

Powell Senior Citizens Ago-Go, Inc. services likely affect every community member in some way. Our transit services are used daily by people who do not have access to their own

transportation. Our services allow riders access to grocery stores, medical appointments, work, social service agencies, banks, social activities, and a variety of other essential destinations. During the winter months, many of our clients do not feel comfortable driving on icy roads or their cars won't start, and a few of the local college students do not have vehicles, so they contact the Powell Senior Citizens Ago-Go, Inc.

Finally, Powell Senior Citizens Ago-Go, Inc.'s planning process relies on input from the public. The agency's services are therefore important to LEP person's lives, and must be accessible to everyone, regardless of ability to speak English.

#### **Factor Four: Resources and Costs for LEP Outreach**

Given that Powell Senior Citizens Ago-Go, Inc. has a very limited number of LEP citizens, we can meet the needs of its LEP population through relatively simple means. First, Powell Senior Citizens Ago-Go, Inc. staff members who speak Spanish or any other foreign languages can be consulted or utilized for translation and interpretation in informal or emergency situations. In the event assistance in a rare language is needed, Powell Senior Citizens Ago-Go, Inc. can reach out to our local college's International Program to find staff who are proficient and may be willing to assist. Other free resources include the use of Google Translate.

On the few times that we have given rides or other assistance to clients who are not proficient in English they have a friend or relative with them to translate and interpret.

These resources give our agency the ability to perform outreach with the LEP population at a reasonable cost.

#### **Section 9: Language Assistance Plan**

As a recipient of federal US DOT funding, the Powell Senior Citizens Ago-Go, Inc. is required to take reasonable steps to ensure meaningful access to our programs and activities by limited-English proficient (LEP) persons.

Limited English Proficient (LEP) refers to persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. This

includes those who have reported to the U.S. Census that they speak English less than very well, not well, or not at all.

The **Powell Senior Citizens Ago-Go, Inc.'s** Language Assistance Plan includes the following elements:

1. The results of the *Four Factor Analysis*, including a description of the LEP population(s), served.
2. A description of how language assistance services are provided by language
3. A description of how LEP persons are informed of the availability of language assistance service
4. A description of how the language assistance plan is monitored and updated
5. A description of how employees are trained to provide language assistance to LEP persons

***Four Factor Analysis Results: LEP Populations Served***

Item #1 – Four Factor Analysis Results: LEP Populations Served
--

The service area’s population speaks 3 LEP languages. However, the overall numbers of residents who speak English ‘less than very well’ are very low. Of the total service area population of 6,478 residents, only 126 or (2.0%), report speaking English less than very well. A breakdown of the language groups, and those speaking English less than very well, are:

Language Group	Number of people who speak the language and English less than very well	Percentage of people who speak English less than very well
<b>Spanish</b>	<b>74</b>	<b>1.14%</b>
<b>Other Asian and Pacific Island</b>	<b>49</b>	<b>0.76%</b>
<b>Other and unspecified languages</b>	<b>3</b>	<b>0.05%</b>



Item # 2 – Description of how Language Assistance Services are Provided, by Language

The Powell Senior Citizens Ago-Go, Inc. has identified, developed, and uses the following:

- a) Individuals who have contact with the public are provided with “I Speak” language cards to identify language needs in order to match them with available services. Language cards verified and distributed by the Director as need.
- b) The Powell Senior Citizens Ago-Go, Inc. has developed partnerships with local agencies, organizations, law enforcement, colleges, local school districts and social service agencies that are available to assist with its LEP responsibilities.
- c) Any other need for translated documents or interpretation services will be provided on an as-needed basis. That is, anyone requesting specific information in a non-English language will be provided it upon request. The agency will use its internal resources to meet this need, when available. Otherwise, the agency will reach out to the network of resources it has developed, or hire a translator or interpreter as needed.

Item #3 – Description of how LEP Persons are Informed of the Availability of Language Assistance Service

In order to ensure that LEP individuals are aware of Powell Senior Citizens Ago-Go, Inc.’s language assistance measures, Powell Senior Citizens Ago-Go, Inc. provides the following:

- Title VI Program including the Language Assistance Plan is made available on website, and in hard copy in central office.
- Drivers and dispatchers are provided “I Speak” language cards to identify language needs in order to match them with available services.
- The agency’s website includes language stating, “If you need assistance or information in another language, please contact (307) 754-4223.” This message is provided in every language identified as meeting the safe harbor threshold, as well as all languages identified as representing at least 1% of the service area.

Item #4 – Description of how the Language Assistance Plan is Monitored and Updated

Powell Senior Citizens Ago-Go, Inc. will continue to update the LEP plan as required by U.S. DOT. At a minimum, the Title VI Plan will continue to be reviewed and updated every three (3) years in conjunction with the Title VI submission and use data from the U.S.

Decennial Census or the American Community Survey as available, or when it is clear that the concentrations of LEP individuals are present in the Powell Senior Citizens Ago-Go, Inc. service area.

Updates will continue to include the following:

- The number of documented LEP person contacts encountered annually.
- How the needs of LEP persons have been addressed.
- Determination of the current LEP population in the service area.
- Determination as to whether the need for translation services has changed.
- Determine whether local language assistance programs have been effective and sufficient to meet the need.
- Determine whether Powell Senior Citizens Ago-Go, Inc.'s financial resources are sufficient to fund language assistance resources needed.
- Determine whether Powell Senior Citizens Ago-Go, Inc. has fully complied with the goals of this LEP Plan.
- Determine whether complaints have been received concerning Powell Senior Citizens Ago-Go, Inc.'s failure to meet the needs of LEP individuals

Item #5 – Description of how Employees are Trained to Provide Language Assistance to LEP Persons
--

The following training will be provided to Powell Senior Citizens Ago-Go, Inc. staff:

- Information on the Powell Senior Citizens Ago-Go, Inc. Title VI Procedures and LEP responsibilities.
- Description of language assistance services offered to the public.
- Use of “I Speak” language cards (used to identify language preference).
- Documentation of language assistance requests.
- Use of “Translate” icon on our Phones
- How to handle a potential Title VI / LEP complaint.

## "I Speak" Language Identification Card

**Note:** For additional languages visit the US Census Bureau website

Mark this Box if you speak...	Language Identification Chart	Language
	Mark this box if you read or speak English	English
	Marque esta casilla si lee o habla español	Spanish
	Kos lub voj no yog koj paub twm thiab hais lus Hmoob	Hmong
	如果说中国在方框内打勾	Chinese
	Xin ñaùnh daáu vaøo oâ naøy neáu quyù vò bieát ñoïc vaø noùi ñöðïc Vieät Ngöõ.	Vietnamese
	당신이 한국어 말할 경우가 상자를 표시	Korean
	Markahan itong kuwadrado kung kayo ay marunong magbasa o magsalita ng Tagalog.	Tagalog
	Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen	German
	Отметить этот флажок, если вы говорите по-русски	Russian
	Означите ову кућицу ако говорите српски	Serbian
	आप हिंदी बोलते हैं तो इस बक्से को चिह्नित करें	Hindi
	پر نشان لگائیں تو اس باکس بولتے ہیں اردو اگر آپ	Urdu

<http://www.lep.gov/ISpeakCards2004.pdf>





## **Section 10: Minority Representation Information**

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.

### **A. Minority Representation Table**

Powell Senior Citizens Ago-Go, Inc. does not have any transit-related, non-elected planning boards, advisory councils or committees, or similar committees, the membership of which is selected by the recipient. This section is inapplicable.

## **Section 11: Providing Assistance to and Monitoring Subrecipients**

1. Does agency provide funding to subrecipients?

No, the agency does not have subrecipients.

## **Section 12: Title VI Equity Analysis for Facility Acquisition**

Title 49 CFR, Appendix C, Section (3)(iv) requires “the location of projects requiring land acquisition and the displacement of persons from their residences and business may not be determined on the basis of race, color, or national origin.” For purposes of this requirement, “facilities” does not include bus shelters, as they are considered transit amenities. It also does not include transit stations, power substations, or any other project evaluated by the National Environmental Policy Act (NEPA) process. Facilities included in the provision include, but are not limited to, storage facilities, maintenance facilities, operations centers, etc. Has the agency built a facility? (check a response below)

No, the agency has not built a facility.

## **Section 13: Fixed Route Transit Providers Service Standards and Policies**

*FTA Circular 4702.1B, Chapter III, Paragraph 10: All fixed route transit providers shall set service standards and policies for each specific fixed route mode of service they provide.*

Powell Senior Citizens Ago-Go, Inc.:

- is a fixed route transit provider
- is **not** a fixed route transit provider