

Center of Family Love

Db: **Center of Family Love**

Title VI Program

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A. Introduction

Center of Family Love agrees to comply with all provisions prohibiting discrimination on the basis of race, color, or national origin of Title VI of the Civil Rights Act of 1964, as amended, 42 U.S.C. 200d *et seq.*, and with U.S. DOT regulations, “Nondiscrimination in Federally-Assisted Programs of the Department of Transportation – Effectuation of Title VI of the Civil Rights Act,” 49 CFR part 21.

Center of Family Love assures that no person shall, as provided by Federal and State civil rights laws, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity. **Center of Family Love** further ensures every effort will be made to ensure non-discrimination in all programs and activities, whether those programs and activities are federally funded or not.

Center of Family Love meets the objectives of the FTA Master Agreement which governs all entities applying for FTA funding, including **Office of Mobility and Public Transit** and its third-party contractors by promoting actions that:

- A. Ensure that the level and quality of transportation service is provided without regard to race, color, or national origin.
- B. Identify and address, as appropriate, disproportionately high and adverse effects of programs and activities on minority populations and low-income populations.
- C. Promote the full and fair participation of all affected Title VI populations in transportation decision making.
- D. Prevent the denial, reduction, or delay in benefits related to programs and activities that benefit minority populations or low-income populations.
- E. Ensure meaningful access to programs and activities by persons with Limited English Proficiency (LEP).

B. Agency Information

1. Mission of TRANSIT AGENCY

The mission of the Center of Family Love is to provide quality lifetime care for adults with developmental disabilities

2. History (including year started)

The Center of Family Love was established in 1981 to provide resources in rural central Oklahoma for adults ages 18 and over with developmental disabilities. These individuals may also have physical and medical disabilities. Through personal care homes, individuals served can continue in educational and therapeutic care while being assisted with daily personal needs. The ultimate goal is to provide each individual with personalized care that encourages self-sufficiency at the highest level possible. Vocational opportunities are established and maintained to allow each individual to work within the community to encourage independence and understanding according to the abilities of each person we serve.

3. Regional Profile (regional population; growth projection)

Canadian County estimated general population per the Canadian County annual census is 169,149 and approximately 15.6% of these people have some form of disability. 74.2% of the population are part of our demographic and include approximately 26,387 individuals with disabilities

4. Population served (in relation to regional population)

The Center of Family Love serves 145 adults with developmental disabilities from across the state through residential living in three communities including Okarche, Kingfisher, and El Reno, Oklahoma. Additionally, we provide vocational opportunities through work centers in those same communities and Oklahoma City.

5. Service area (include map, with any routes utilized)

Our service area includes Okarche, Kingfisher and El Reno, Oklahoma for residential and vocational care. As permanent residents of our facilities the multi-level care that we provide also requires access to the Oklahoma City metropolitan area. This is required due to the many aspects of daily life that we provide for our residents. These include medical treatments, educational needs, therapeutic opportunities, and social outings.

6. Governing body make-up (include terms of office)

Center of Family Love is governed by a Board of Trustees

Kevin Flynn, Chairman 2020-2026

Greg Gawey, Vice-Chairman 2021-2027

John Pierce, Secretary 2019-2025

John McNamara - Treasurer 2022-2028

Joseph Fleckinger 2020-2026

Father Rex Arnold 2022-2028

Sara Brown 2021-2027

Ron Byrne 2023-2029

Ron Carel 2019-2025

Jerry Krittenbrink 2019-2025

Father Brian O'Brien 2020-2026

Willard Patocka 2023-2029

Jeanne Sullivan 2020-2026

Chris Victor (State Deputy) 2023-2025

Paul Weigl 2021-2027

Jan Wittrock 2023-2029

Daniel Zeigler 2019-2025

C. Notice to the Public

NOTIFYING the PUBLIC of RIGHTS UNDER TITLE VI (NAME OF TRANSIT AGENCY)

- The **Center of Family Love** operates its programs 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 (Transit Agency).
- For more information on the **Center of Family Love's** civil rights program, and procedures to file a complaint, contact 405-263-4658 ex. 1004,) Epowell@cflinc.org or visit our administrative office at 635 W. Texas Avenue, Okarche, Okarche, Oklahoma, 73762
- A complainant may file a complaint directly with the Oklahoma Department of Transportation by filing a complaint with the Contract Compliance Division, Attention: Contract Compliance Division Manager, 200 NE 21st Street, Oklahoma City, OK 73105-3204.
- If information is needed in another language contact: 405-263-4658 ex. 1004 Eric Powell, V.P. Human Resources

*LIST OF LOCATIONS

Title VI documentation is posted in the Okarche Town Hall and each of our transport vehicles, Fleet manager office, Human resources and in each building on campus.

D. Procedure for Filing a Title VI Complaint

Filing a Title VI Complaint

The complaint procedures apply to the beneficiaries of programs, activities, and services.

RIGHT TO FILE A COMPLAINT: Any person who believes they have been discriminated against on the basis of race, color, or national origin by **Center of Family Love** may file a Title VI complaint by completing and submitting the agency's **Title VI Complaint Form**. Title VI complaints must be received in writing within 180 days of the alleged discriminatory complaint.

HOW TO FILE A COMPLAINT: Information on how to file a Title VI complaint is posted on our agency's website, and in public areas of our agency.

You may download the **Center of Family Love** Title VI Complaint Form at **Center of familylove.org** or request a copy by writing to **635 West Texas Avenue, Okarche, Oklahoma, 73762** Information on how to file a Title VI complaint may also be obtained by calling **Center of Family Love** at **405-263-4658**.

You may file a signed, dated complaint no more than 180 days from the date of the alleged incident. The complaint should include:

- Your name, address and telephone number.
- Specific, detailed information (how, why and when) about the alleged act of discrimination.
- Any other relevant information, including the names of any persons, if known, the agency should contact for clarity of the allegations.

Please submit your complaint form to **Eric Powell, V.P. Human Resources 635 West Texas Avenue, Okarche, Oklahoma, 73762**

COMPLAINT ACCEPTANCE: **Center of Family Love** will process complaints that are complete.

Once a completed Title VI Complaint Form is received, **Center of Family Love** will review it to determine **Center of Family Love** has jurisdiction. The complainant will receive an acknowledgement letter informing them whether or not the complaint will be investigated by the **Center of Family Love**.

INVESTIGATIONS: **Center of Family Love** will generally complete an investigation within 90 days from receipt of a completed complaint form. If more information is needed to resolve the case, **Center of Family Love TITLE VI COORDINATOR, Eric Powell**, may contact the complainant. Unless a longer period is specified by **Center of Family Love TITLE VI COORDINATOR**, the complainant will have ten (10) days from the date of the letter to send requested information to **Center of Family Love** investigator assigned to the case.

If the requested information is not received within that timeframe the case will be closed. Also, a case can be administratively closed if the complainant no longer wishes to pursue the case.

LETTERS OF CLOSURE OR FINDING: After the Title VI investigator reviews the complaint, the Title VI investigator will issue one of two letters to the complainant: a closure letter or 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 provides an explanation of the corrective action taken.

If the complainant disagrees with **Center of Family Love's** determination, the complainant may request reconsideration by submitting the request in writing to the Title VI investigator within seven (7) days after the date of the letter of closure or letter of finding, stating with specificity the basis for the reconsideration. **Center of Family Love** will notify the complainant of the decision either to accept or reject the request for reconsideration within ten (10) days. In cases where reconsideration is granted, **Center of Family Love** will issue a determination letter to the complainant upon completion of the reconsideration review.

A person may also file a complaint directly with the Federal Transit Administration, at the FTA Office of Contract Compliance, 1200 New Jersey Avenue SE, Washington, DC 20590.

If information is needed in another language, contact **Center of Family Love** at **635 West Texas Avenue, Okarche Oklahoma, 73762** or at **405-263-4658**.

E. Monitoring Title VI Complaints, Investigations, Lawsuits and Documenting Evidence of Agency Staff Title VI Training

Documenting Title VI Complaints/Investigations

All Title VI complaints will be entered and tracked in **Center of Family Love’s** complaint log. Active investigations will be monitored for timely response on the part of all parties. The agency’s Title VI Coordinator shall maintain the log.

Agency Title VI Complaint Log

Date complaint filed	Complainant	Basis of complaint R-C-NO	Summary of allegation	Pending status of complaint	Actions taken	Closure Letter (CL)	Letter of Finding (LOF)	Date of CL or LOF

Documenting Evidence of Agency Staff Title VI Training

Center of Family Love’s staff is given Title VI training, and agency can answer affirmatively to all the following questions:

1. Are new employees made aware of Title VI responsibilities pertaining to their specific duties?
2. Do new employees receive this information via employee orientation?
3. Is Title VI information provided to all employees and program applicants?
4. Is Title VI information prominently displayed in the agency and on any program materials distributed, as necessary?

Public Participation Plan

Goal

The goal of the Public Participation Plan is to have significant and ongoing public involvement, by all identified audiences, in the public participation process for major agency outreach efforts.

Objectives

- To understand the service area demographics and determine what non-English languages and other cultural barriers exist to public participation.
- To provide general notification of meetings and forums for public input, in a manner that is understandable to all populations in the area.
- To hold public meetings in locations that are accessible to all area stakeholders, including but not limited to minority and low-income members of the community.
- To provide methods for two-way communication and information and input from populations which are less likely to attend meetings.
- To convey the information in various formats to reach all key stakeholder groups.

Identification of Stakeholders

Stakeholders are those who are either directly or indirectly affected by an outreach effort, system or service plan or recommendations of that plan. Stakeholders include but are not limited to the following:

- Board of Directors – the governing board of the agency. The role of the Board is to establish policy and legislative direction for the agency. The Board defines the agency's mission, establishes goals, and approves then budget to accomplish the goals.
- Advisory Bodies – non-elected advisory bodies review current and proposed activities of the agency, and are encouraged to be active in the agency's public participation process. Advisory bodies provide insight and feedback to the agency.
- Agency Transit riders and clients
- Minority and low-income populations, including limited English proficient persons
- Local jurisdictions and other government stakeholders
- Private businesses and organizations
- Employers
- Partner agencies

Elements of the Public Participation t Plan

It is necessary to establish a public participation plan that includes an outreach plan to engage minority and limited English proficient (LEP) populations.

Elements of the Public Engagement Plan include:

1. Public Notice

- a. Official notification of intent to provide opportunity for members of the general public to participate in public engagement plan development, including participation in open Board/council meetings, and advisory committees.

2. Public Engagement Process/Outreach Efforts:

- a. Public meetings
- b. Open houses
- c. Rider forums
- d. Rider outreach
- e. Public hearings
- f. Focus groups
- g. Surveys
- h. Services for the Disabled (Notices of opportunities for public involvement include contact information for people needing these or other special accommodations.)

Events such as public meetings and/or open houses are held at schools, churches, libraries and other non-profit locations easily accessible to public transit and compliant with the Americans with Disabilities Act.

3. Public Comment

- a. Formal public comment periods are used to solicit comments on major public involvement efforts around an agency service or system change.
- b. Comments are accepted through various means:
 - i. Dedicated email address.
 - ii. Website.
 - iii. Regular mail.
 - iv. Forms using survey tool for compilation.
 - v. Videotaping.
 - vi. Phone calls to Customer Service Center [phone]

4. Response to Public Input

All public comments are provided to the Board of Directors prior to decision making. A publicly available summary report is compiled, including all individual comments.

Title VI Outreach Best Practices

Center of Family Love ensures all outreach strategies, communications and public involvement efforts comply with Title VI. **Center of Family Love's** Public Participation Plan proactively initiates the public involvement process and makes concerted efforts to involve members of all social, economic, and ethnic groups in the public involvement process. Aligned

with the above referenced communication tactics, **Center of Family Love** provides the following:

- a. Public notices published in non-English publications (if available).
- b. Title VI non-discrimination notice on agency's website.
- c. Agency communication materials in languages other than English (subject to Safe Harbor parameters).
- d. Services for Limited English Proficient persons. Upon advance notice, translators may be provided.

2024-2026 Title VI Program Public Participation Process

Center of Family Love will conduct a Public Participation Process for the **2024-2026** Title VI Program. This process includes Community Meetings to seek input, provide education, and highlight key components of the Title VI Plan. Materials have been created to explain Title VI policies as well as provide education on how they relate to minority populations.

Center of Family Love will provide briefings to the Board of Directors and Advisory Bodies.

Center of Family Love will conduct a 30 day public comment period to provide opportunities for feedback on the **2024-2026** Title VI Program.

Comments are accepted during the public outreach period via:

- a. Email
- b. Mail
- c. Phone
- d. In person
- e. Survey tool

F. Language Assistance Plan

Center of Family Love Limited English Proficiency Plan

This limited English Proficiency (LEP) Plan has been prepared to address **Center of Family Love** 's responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964; Federal Transit Administration Circular 4702.1B, dated October 1, 2012, which states that the level and quality of transportation service is provided without regard to 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, write or understand English is a type of national origin discrimination. It directs each federal agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discriminations do not take place. This order applies to all state and local agencies which receive federal funds.

Service Area Description: Our service area includes Okarche, Kingfisher and El Reno, Oklahoma for residential and vocational care. As permanent residents of our facilities the multi-level care that we provide also requires access to the Oklahoma City metropolitan area. This is required due to the many aspects of daily life that we provide for our residents. These include medical treatments, educational needs, therapeutic opportunities, and social outings.

Center of Family Love has developed this LEP Plan to help identify reasonable steps for providing language assistance to persons with limited English proficiency who wish to access services provided by **Center of Family Love**. 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, and the ways in which assistance may be provided.

In order to prepare this plan, **Center of Family Love** undertook the **four-factor LEP analysis** which considers the following factors:

Four Factor Analysis

1. The number and proportion of LEP persons eligible to be served or likely to be encountered in the service area:

A significant majority of people in the **Center of Family Love** service area are proficient in the English language. Based on 2010 Census data, [3.47%] of the population five years of age and older speak English "less than very well" – a definition of limited English proficiency

LEP Population in Center of Family Love Service Area					
Population 5 years and over by language spoken at home and ability to speak English	Service Area Sector [1]	Service Area Sector [1]	Service Area Sector [1]	Service Area Total	Percentage of Population 5 Years and Older
<u>Population 5 Years and Over</u>	158,756	13,311		173,067	
Speak English “less than very well”	5,008	1,000		6,008	3.47%
<u>Spanish</u>	9,983	1,906		11,889	6.87%
Speak English “less than very well”	2,563	699		3,262	1.88%
<u>Other Indo-European</u>	727	268		995	0.57%
Speak English “less than very well”	109	113		222	0.13%
<u>Asian and Pacific Island</u>	3,738	192		3,930	2.27%
Speak English “less than very well”	2,336	178		2,514	1.45%
<u>All Other</u>	370	48		418	0.24%
Speak English “less than very well”	0	10		10	0.01%

2. Frequency of Contact by LEP Persons with **Center of Family Love** ‘s Services:

The **TRANSIT AGENCY** staff reviewed the frequency with which office staff, dispatchers and drivers have, or could have, contact with LEP persons. To date, **Center of Family Love** has on average, **zero** for an interpreter. **Center of Family Love** averages zero phone calls per month.

LEP Staff Survey Form	
<p>Center of Family Love is studying the language assistance needs of its riders so that we can better communicate with them if needed.</p>	
<p>1. How often do you come into contact with passengers who do not speak English or have trouble understanding you when you speak English to them?</p>	

DAILY WEEKLY MONTHLY LESS THAN MONTHLY

2. What languages do these passengers speak?
3. What languages (other than English) do you understand or speak?
4. Would you be willing to serve as a translator when needed?

Frequency of Contact with LEP Persons	
Frequency	Language Spoken by LEP Persons
Daily	0
Weekly	0
Monthly	0
Less frequently than monthly	0

3. The importance of programs, activities or services provided by **Center of Family Love** to LEP persons:

Outreach activities, summarized in **Center of Family Love** 's Title VI Public Engagement Plan, include events such as public meetings and/or open houses held at schools, churches, libraries and other non-profit locations, and include specific outreach to LEP persons to gain under-standing of the needs of the LEP population, and the manner (if at all) needs are addressed.

Outside Organization LEP Survey	
Organization: __Town of Okarche_____	
<ol style="list-style-type: none"> 1. What language assistance needs are encountered? Translation for non-English speakers 2. What languages are spoken by persons with language assistance needs? Spanish and Vietnamese 3. What language assistance efforts are you undertaking to assist persons with language assistance needs? Purchase of translation apps for I-phone and android devices 4. When necessary, can we use these services? Yes 	

4. The resources available to **Center of Family Love** and overall cost to provide LEP assistance:

Strategies for Engaging Individuals with Limited English Proficiency include:

1. Language line. Upon advance notice, translators can be provided.
2. Language identification flashcards.
3. Written translations of vital documents (identified via safe harbor provision)
4. One-on-one assistance through outreach efforts.
5. Website information.
6. To the extent feasible, assign bilingual staff for community events, public hearings and Board of Directors meetings and on the customer service phone lines.

As applicable: Based on our demographic analysis (Factor 1) **Center of Family Love** has determined that no language group(s) within its service area meets Safe Harbor criteria requiring written translated “vital documents” by language group(s).

Center of Family Love will provide assistance and direction to LEP persons who request assistance.

Staff LEP Training

The following training will be provided to **Center of Family Love** staff:

1. Information on **Center of Family Love** Title VI Procedures and LEP responsibilities.
2. Description of language assistance services offered to the public.
3. Use of Language Identification Flashcards.
4. Documentation of language assistance requests.

Monitoring and Updating the LEP Plan

The LEP Plan is a component of **Center of Family Love’s** Title VI Plan requirement.

Center of Family Love will update the LEP plan as required. At minimum, the plan will be reviewed and updated when it is clear that higher concentrations of LEP individuals are present in the **Center of Family Love** service area. Updates include the following:

1. How the needs of LEP persons have been addressed.
2. Determine the current LEP population in the service area.
3. Determine as to whether the need for, and/or extent of, translation services has changed.
4. Determine whether local language assistance programs have been effective and sufficient to meet the needs.
5. Determine whether **Center of Family Love’s** financial resources are sufficient to fund language assistance resources as needed.
6. Determine whether **Center of Family Love** has fully complied with the goals of this LEP Plan.
7. Determine whether complaints have been received concerning **Center of Family Love’s** failure to meet the needs of LEP individual.

G. Advisory Bodies

Table Depicting Membership of Committees, Councils, By Race

Committee [examples]	Caucasian	Latino	African American	Asian American		Total
Population Committee Board of Directors	17				17	100%
Access Committee	5	1	2		8	100%
Citizens Advisory Council	5	1			6	100%

Description of efforts made to encourage minority participation on committees:

- Established a Transportation Access Committee to ensure that every resident has equal opportunity access to necessary transportation
- Established a Community Citizens Advisory Council to ensure that community transportation needs are considered, and communications are clear that our vehicles are made available

H. Subrecipient Assistance

OPTION A

Center of Family Love does not have any subrecipients.

I. Subrecipient Monitoring

Center of Family Love does not have any subrecipients.

J. Equity Analysis of Facilities

Center of Family Love has not constructed any storage facilities, maintenance facilities, or operations centers in the last three years.

Agency Information

Center of Family Love

The mission of the Center of Family Love (CFL) is to provide a lifetime of quality care for adults with developmental disabilities. CFL was established in 1981 to provide resources in central Oklahoma for adults aged 18 and above who deal with developmental disabilities. These individuals may also have physical and medical disabilities as well. Through personal care homes, these individuals continue educational and therapeutic care while being assisted with daily personal needs and gaining greater self-sufficiency. Vocational opportunities have also been established to encourage our residents to develop and maintain independence.

Canadian County's estimated general population is 166,976 and approximately 14.6% of this total population are diagnosed with some form of disability. 74.2% of this population are part of our demographic and currently include an estimated 22,000 individuals with disabilities.

CFL serves 145 adults with developmental disabilities from across the state. We provide housing and care in three communities in central Oklahoma, including Okarche, Kingfisher and El Reno. Additionally, CFL provides vocational opportunities through work centers in this region. These work centers are owned by CFL and we also collaborate with other businesses in this area to provide workers, as well.

Center of Family Love is governed by a Board of Trustees

Kevin Flynn, Chairman 2020-2026

Greg Gawey, Vice-Chairman 2021-2027

John Pierce, Secretary 2019-2025

John McNamara - Treasurer 2022-2028

Joseph Fleckinger 2020-2026

Father Rex Arnold 2022-2028

Sara Brown 2021-2027

Ron Byrne 2023-2029

Ron Carel 2019-2025

Jerry Krittenbrink 2019-2025

Father Brian O'Brien 2020-2026

Willard Patocka 2023-2029

Jeanne Sullivan 2020-2026

Chris Victor (State Deputy) 2023-2025

Paul Weigl 2021-2027

Jan Wittrock 2023-2029

Daniel Zeigler 2019-2025

TITLE VI COMPLAINT FORM –

The **Center of Family Love** is committed to ensuring that no person is excluded from participation in or denied the benefits of its services on the basis of race, color, or national origin, as provided by the Title VI of the Civil Rights Act of 1964, as amended. The Title VI complaints must be filed within 180 calendar days from the date of the alleged discrimination.

Date of Filing:	
Name:	
Address:	
City, State, Zip Code:	
Work Phone:	
Home Phone:	
E-mail Address:	

Center of Family Love

635 W Texas,

Okarche, Oklahoma 73762

Phone: (405) 263-4658

Indicate on what ground(s) you believe you have been discriminated against (check all that apply):

Race Color National Origin

Indicate the person(s) who you believe discriminated against you:

Name(s):	
Work Location (if known):	
Work Phone:	
Date of alleged incident	

If you have an attorney representing you concerning the matters raised in this complaint, please provide the following:

Name:	
Address:	
Work Phone:	
E-mail Address:	

Explain why you believe discrimination has occurred. If there are witnesses, please provide names, addresses and telephone numbers. Be sure to include how other persons were treated differently than you. Attach additional pages as necessary and any written material pertaining to your case.

What remedy are you requesting? Please be specific:

Have you filed or do you intend to file a charge or complaint concerning the matters raised in this complaint with any other agencies (Federal, State, or local):

Yes

No

If so, please provide the following information:

Agency:

Address:

Name of Investigator (if known):

Phone Number:

E-mail Address:

Date Filed:

Status of case:

I confirm that I have read the above charge(s) and it is true to the best of my knowledge.

Print or typed name of complainant:

Signature

Date

Completed forms must be submitted to the **Center of Family Love.**
If you require any assistance in filling out this form please contact the **Center of Family Love** Title VI
Coordinator, Eric Powell at
405-263-4658 ex 1004.

The **Center of Family Love** ensures that no person or groups of persons shall, on the grounds of race, color, sex, religion, national origin, age, disability, retaliation or genetic information, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any and all programs, services, or activities administered by **Center of Family Love.** To request an accommodation please contact the **Center of Family Love** ADA Coordinator at **405-263-4658, ex 1004.**