

# NCRMHB/WAY TO GO CT

## TITLE VI PLAN



*August 29, 2013 (Revised July 5, 2018)*

### **I. Plan Statement**

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that “no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal assistance (42 U.S. C. Section 2000d).

The North Central Regional Mental Health Board (NCRMHB) is committed to ensuring that no person is excluded from participation in NCRMHB programs or activities on the basis of race, color, religion, sex, or national origin as protected by Title VI and Title VII of the Civil Rights Act of 1964.

Environmental Justice and Executive Orders 13166 and 12898 further amplify Title VI by requiring programs or activities receiving Federal assistance to identify and address disproportionately high and adverse human health or environmental effects of its programs, policies and activities on minority and low-income populations.

This plan was developed to guide the NCRMHB in its administration and management of Title VI-related activities.

### **II. Public Involvement**

NCRMHB was created by Connecticut Statute to ensure that citizens are involved in planning and monitoring the behavioral health services provided by the State of Connecticut. NCRMHB promotes the active participation of citizen

volunteers in all aspects of behavioral health planning. Such activities are designed to increase sensitivity and awareness of the special needs and culture of persons with disabilities, low-income and minority groups and to encourage their participation in planning for services maximally responsive to their needs.

NCRMHB's Mobility Management Program, Way To Go Connecticut, conducts outreach targeted regarding transportation options to individuals with disabilities, low income, older adult, veteran, and minority populations in the Greater Hartford area. Outreach events are held in human service agencies, senior and community centers, local mental health authorities, commissions on disabilities, commissions on aging, VA centers, senior fairs, health fairs, expos, homeless shelters, food share sites and housing authorities where older adults, low-income and/or disabled individuals may reside. The Mobility Manager informs these populations on the options available in their specific geographical area and uses survey information gathered from many survey participants on gaps and barriers specific to their needs.

### **III. Limited English Proficiency and Language Assistance Plan**

Language for individuals with Limited-English Proficiency (LEP) can be a barrier to accessing important benefits or services, understanding and exercising important rights, complying with applicable responsibilities, or understanding other information provided by federally funded programs and activities.

Title VI or the Civil Rights Act of 1964 requires entities that receive federal assistance to examine the services they provide, identify any need for services to those with limited English proficiency (LEP), and develop and implement a system to provide those services so LEP persons can have meaningful access to them.

NCRMHB will take all reasonable steps in compliance with Title VI of the Civil Rights Act of 1964 to ensure meaningful access to programs and activities provided by the Board to individuals with LEP, thereby preventing discrimination.

NCRMHB considers the following in the development of its LEP plan: The number of LEP persons likely to be served by the program; the frequency in which LEP persons come into contact with the program; the nature and

importance of program services in people's lives; NCRMHB resources available for LEP outreach (see attached four factor analysis).

LEP Populations Served: Based on DataUSA: Hartford County, the most common non-English language spoken in NCRMHB's service area is Spanish (12.1%). The next two most common languages are Polish (2.1% and French (1.3%). There are 17 other non-English languages spoken by Hartford County residents for which Safe Harbor provisions (at least 1000 persons within the total population) might apply. They are as follows: Italian, Portuguese, Chinese, Hindi, Arabic, Russian, Vietnamese, Serbo-Croatian, Gujarati, Urdu German, Samoan, Greek, Other Slavic, French Creole, Korean, Laotian NCRMHB has also received requests for resource information designed for use by individuals who are visually impaired.

Vital Documents subject to translation: Way To Go written documents include the NCRMHB/Way to Go CT Title VI Plan, Brochures, Title VI complaint forms, and the Title VI Notice to the Public. Way To Go staff also maintains a website with detailed information per community about transportation options available, contact information, routes and operating schedules, fares, inter-city access, etc., geared towards older adults, veterans, and persons with disabilities. All of the information on the website is translatable into 195 different languages, including those Safe Harbor languages listed above.

Current Language Assistance Measures: NCRMHB provides language assistance in the following two methods: 1) oral interpretation whether in person or via telephone interpretation services; (2) and written translation. Oral interpretation can range from on-site interpreters for critical services to telephonic interpretation services. Written translation can range from translation of an entire document to translation of a short description of the document. Way To Go CT resource guides, Title VI complaint forms, and the Title VI Notice to the Public are currently available in English, Spanish, Polish, and braille upon request. Way to Go CT brochures are also currently available in Polish, and Russian upon request. The Way To Go CT website is fully ADA compliant, translatable into more than 195 languages, and is compatible with accepted screen reader programs for the visually impaired. The NCRMHB Title VI Plan and Notice to the Public is included in the resource guide and on the website (translated upon request as described above). The Title VI Notice to

the Public includes a statement that persons with Limited English Proficiency may request language assistance. The statement is repeated in Spanish, Polish, French and the other languages subject to Safe Harbor provisions.

Future Language Assistance Measures: NCRMHB will determine which items or activities will be translated given changes in regional demographics, requests received, and resources available. These may include, but not be limited to: outreach presentations, public meetings and notices, brochures, resource guides, and in person call-center guidance.

Training: The Title VI Coordinator and Way To Go CT staff attend Title VI trainings as offered by the CT Department of Transportation. Training re: the NCRMHB Title VI Plan is provided to Way To Go CT staff upon hire and reviewed annually and/or as the policy is updated.

Notification of Availability: NCRMHB notices of outreach or public events or availability of published resource materials will include a statement that persons with Limited English Proficiency may request language assistance.

Monitoring: NCRMHB will monitor, evaluate, and update the language assistance plan annually based on changes in regional demographics, requests and/or complaints received, and resources available.

#### **IV. Complaint Process and Procedures**

The NCRMHB Executive Director is responsible for monitoring NCRMHB compliance with Title VI requirements.

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by the NCRMHB Way to Go CT program or staff may file a Title VI complaint by completing and submitting the NCRMHB/Way to Go CT Complaint Form (see Attachment 1) to the NCRMHB Executive Director. NCRMHB investigates complaints that are complete and received no more than 180 days after the alleged incident. NCRMHB will provide the CT Department of Transportation with notice of complaints received within 10 days of receipt.

Once the complaint is received, the NCRMHB Executive Director will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter informing him/her whether the complaint will be investigated by our office.

NCRMHB has 30 days to investigate the complaint. If more information is needed to resolve the case, NCRMHB may contact the complainant. The complainant has 28 business days from the date of the letter to send requested information to NCRMHB. If NCRMHB is not contacted by the complainant or does not receive the additional information within 28 business days, NCRMHB can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

After NCRMHB reviews the complaint, NCRMHB 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. A letter of finding summarizes the allegations and the interviews regarding the alleged incident and explains whether any disciplinary actions, 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 of LOF to do so by filing a written appeal with the may NCRMHB Board of Directors. The NCRMHB Executive Committee will solicit written opinions from all parties in the dispute including the Executive Director. The Executive Committee will render a decision within 90 days and send it to the Board of Directors for further action.

The complainant 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 or with the CT Department of Transportation, Attention Debra Gross, Title VI Coordinator, 2800 Berlin Turnpike, Newington, CT 06111.