

Non-Discrimination, Non-Harassment, Non-Retaliation & Equal Opportunity Policy

Title VI Program

I. Program 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 ground 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 financial assistance" (42 U.S.C. Section 2000d).

Jewish Family Services of Washtenaw County is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services on the basis of race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1B.

This plan was developed to guide the Jewish Family Services of Washtenaw County in its administration and management of Title VI-related activities.

Title VI Coordinator Contact information

Elina Zilberberg, COO
Jewish Family Services of Washtenaw County
2245 S. State St.
Ann Arbor, MI 48104
Tel. 734-769-0209

II. Title VI Information Dissemination

Title VI information posters (see Appendix H) shall be prominently and publicly displayed in the Jewish Family Services of Washtenaw County facility and on their vehicles. The name of the Title VI coordinator is available on the Jewish Family Services of Washtenaw County website, at www.jfsann Arbor.org. Additional information relating to nondiscrimination obligation can be obtained from the Jewish Family Services of Washtenaw County Title VI Coordinator.

Title VI information shall be disseminated to Jewish Family Services of Washtenaw County employees annually via mandatory staff trainings in agency meetings. This training provides employees of the Jewish Family Services of Washtenaw County understanding of the policy statement, and of their Title VI responsibilities in their daily work and duties.

During New Employee Orientation, new employees shall be informed of the provisions of Title VI, and the Jewish



Family Services of Washtenaw County expectations to perform their duties accordingly. All employees shall be provided a copy of all JFS Policies including the Title VI Program and are required to sign the Acknowledgement of Receipt.

III. Subcontracts and Vendors

All subcontractors and vendors who receive payments from Jewish Family Services of Washtenaw County where funding originates from any federal assistance are subject to the provisions of Title VI of the Civil Rights Act of 1964 as amended.

Written contracts shall contain non-discrimination language, either directly or through the bid specification package which becomes an associated component of the contract. Subcontractors and vendors will be monitored through observation and a complaint investigation process.

IV. Record Keeping

The Title VI Coordinator will maintain permanent records, which include, but are not limited to, signed acknowledgements of receipt from the employees indicating the receipt of the of Jewish Family Services of Washtenaw County Title VI Program, copies of Title VI complaints or lawsuits and related documentation, and records of correspondence to and from complainants, and Title VI investigations.

V. Title VI Complaint Procedures

How to file a Title VI Complaint?

The complainant may file a signed, written complaint up to one hundred and eighty (180) days from the date of the alleged discrimination. The complaint should include the following information:

- Your name, mailing address, and how to contact you (i.e., telephone number, email address, etc.)
- How, when, where and why you believe you were discriminated against. Include the location, names and contact information of any witnesses.
- Other information that you deem significant

The Title VI Complaint Form may be used to submit the complaint information. The complaint may be filed in writing with Jewish Family Services of Washtenaw County at the following address:

Jewish Family Services of Washtenaw County
2245 S. State St.
Ann Arbor, MI 48104

NOTE: Jewish Family Services of Washtenaw County encourages all complainants to certify all mail that is sent through the U.S. Postal Service and/or ensure that all written correspondence can be tracked easily. For complaints originally submitted by facsimile, an original, signed copy of the complaint must be mailed to the Title VI Coordinator as soon as possible, but no later than 180 days from the alleged date of discrimination.

What happens to the complaint after it is submitted?

All complaints alleging discrimination based on race, color or national origin in a service or benefit provided by Jewish Family Services of Washtenaw County will be directly addressed by Jewish Family Services of Washtenaw County. Jewish Family Services of Washtenaw County shall also provide appropriate assistance to complainants, including those persons with disabilities, or who are limited in their ability to communicate in English. Additionally, Jewish Family Services of Washtenaw County shall make every effort to address all complaints in an expeditious and thorough manner.

A letter of acknowledging receipt of complaint will be mailed within seven days. Please note that in responding to any requests for additional information, a complainant's failure to provide the requested information may result in the administrative closure of the complaint.

How will the complainant be notified of the outcome of the complaint?

Jewish Family Services of Washtenaw County will send a final written response letter to the complainant. In the letter notifying complainant that the complaint is not substantiated, the complainant is also advised of his or her right to 1) appeal within seven calendar days of receipt of the final written decision from Jewish Family Services of Washtenaw County, and/or 2) file a complaint externally with

the U.S. Department of Transportation and/or the FTA. Every effort will be made to respond to Title VI complaints within 60 working days of receipt of such complaints, if not sooner.

In addition to the complaint process described above, a complainant may file a Title VI complaint with the following offices:

Federal Transit Administration Office of Civil Rights
Attention: Title VI Program Coordinator
East Building, 5th Floor – TCR
1200 New Jersey Ave., SE
Washington, DC 20590

VI. List of transit-related Title VI investigations, complaints, and lawsuits received by JFS.

None received.

VII. Four Factor Analysis

1. **Number/proportion of LEP persons served/likely to be served** by the JFS Transportation Services Program: approximately 35% of clients using Transportation Program Services are LEP persons (74 of approximately 210 unduplicated clients). These clients also receive other JFS services which may include but are not necessarily limited to: English as a Second Language (ESL) classes, employment and resettlement services, counseling, and case management. Most of this LEP client population are Arabic speakers (please note that this may vary over time as JFS is the area's only State Department authorized resettlement agency and does not determine the composition of the resettlement population sent to it each year under the auspices of the State Department).

No LEP persons are underserved by the JFS Transportation Program due to language barriers.

2. The **frequency of contact** with the JFS Transportation Program by LEP persons is usually on a weekly basis.

3. The **importance** of JFS Transportation Program services to the JFS LEP client population is high as this population has a low proportion of personal vehicle ownership and these services provide transportation for employment, health care, education, and basic shopping.

4. **The JFS budget includes those resources required to meet the needs of the LEP population.** JFS programs such as the ESL Program, the Transportation Program and the Employment Services Program all serve this population and are funded to meet the Language Assistance Plan and the needs of this population.

VIII. Limited English Proficiency (LEP) Plan and Language Assistance Plan (LAP).

Policy Statement

Jewish Family Services of Washtenaw County shall provide at no cost, accurate and timely language assistance and effective communications to persons with Limited English Proficiency (LEP). These language services will be provided to current and prospective clients of our services, and other interested persons to ensure them meaningful access to our services. Please see attached four factor analysis.

Legal Basis

Enforcement of Title VI of the Civil Rights Act of 1964; Policy Guidance to Federal Financial Assistance Regarding the Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons.

Background

Jewish Family Services use data from two sources in order to determine the extent of the need for language assistance by agency's clients: a) Agency's Client Database containing demographic information on JFS customers and b) client surveys. This data is then analyzed in order to determine the extent of current needs and the current resources being used to address those needs.

JFS has recognized language barriers throughout its 30- year history and employs a variety of resources to mitigate it including a multi-lingual staff, multi-lingual volunteers, and official translation services and phone line resources.

Oral Communications Needs

Whenever an interpreter is needed, JFS is responsible for assistance with obtaining and providing the service to persons with Limited English Proficiency. A staff resource may be used. To this end, the JFS LEP coordinator will survey its employees to determine those with bilingual abilities.

If a staff person is available and would be appropriate for communication by phone or in-person, that resource should be considered first.

If a staff person is unavailable or JFS has no employees who speak the language needed, or if the available interpreters do not meet customer needs, the following resources may be used:

- telephonic translation service available through Department of Human Services;
- University of Michigan translation services for medical appointments;
- JFS volunteers

If the LEP person desires to use a family member, friend, or other informal interpreter; they will be permitted to do so. Recognizing the proportion of Arabic speakers in the JFS LEP Transportation Program client population (see the Four Factors Analysis above), several JFS Transportation Program drivers are native Arabic speakers.

JFS Written Materials

For vital documents, JFS will provide written translation services in Arabic, Ukainian and Spanish (three most prominent languages spoken by JFS clients). Translations will apply to forms, enrollment forms, consent forms, and any documents, that are required in order to receive JFS services. Translations services will also apply to notices pertaining to changes, denial, or termination of services or benefits, the right to appeal such actions, notices advising LEP persons of the availability of free language assistance, and other outreach materials. JFS may decide to add additional materials to be translated in the future.

Employee Training

All newly hired employees of Jewish Family Services receive Cultural Sensitivity training that addresses the issues of dealing with LEP individuals as part of their hiring process. In addition, all employees receive such trainings regularly (no less than annually).

Monitoring

The JFS LEP coordinator will be responsible for monitoring compliance with the LEP and LAP Policy. This monitoring includes periodic assessment of the languages required by any changes in the JFS LEP client population (including specific languages spoken and specific services required).

IX. Public Participation Plan/Stakeholder Input and Community Outreach

I. POLICY

It is the policy of Jewish Family Services of Washtenaw County (JFS) to solicit, collect, analyze and use input from all stakeholders to create services and business practices that meet or exceed the expectations of persons served, the community, and other stakeholders.

II. PURPOSE

The purpose of this policy is to establish the standards and procedures used to gather stakeholder input in an ongoing manner that uses a variety of sources and results in service and business practice design and operation, performance improvement, strategic and financial planning, resource allocation planning, and if indicated, organizational advocacy.

III. DEFINITIONS

Stakeholder Input - Includes but is not necessarily limited to, evaluation of service effectiveness, overall with services, identifying unmet needs, access to services, complaints and recommendations regarding services, ideas for future services and ideas about resources.

IV. STANDARDS

- A. Input from persons served, agency personnel and other specifically identified stakeholders is obtained on an on-going basis.
- B. All program designs include a mechanism for gathering stakeholder input.
- C. Input is obtained in a variety of ways that allow all identified stakeholders to participate.
Methodologies include but are not necessarily limited to:
 - 1. Surveys of various stakeholder populations such as persons served, etc.
 - 2. Client Surveys/Event Evaluation.
 - 3. Exit interviews with persons served, agency personnel and volunteers.
 - 4. Complaint, grievance and incident reporting and resolution procedures.
 - 5. Agency attendance and participation in relevant professional conferences and meetings.
 - 6. Agency attendance and participation in relevant community conferences and meetings.
- D. The JFS administrative team regularly reviews the input gathered and uses it in evaluating current operations, planning future operations and strategic planning.
- E. Documents that reflect the impact of stakeholder input include:
 - 1. JFS program descriptions
 - 2. Committee, Staff and Board meeting minutes
 - 3. Quarterly data summaries of Client Survey returns, Program Evaluation Forms, complaints, grievances and incident reports.
 - 4. Staff performance evaluations and improvement plans.
 - 5. JFS Annual Accessibility Plan

V. PROCEDURES

- A. Program directors/staff create and implement program compatible methods to gather and measure relevant stakeholder input.
- B. Caseworkers provide each client with a Client Survey upon intake, during service delivery, upon case closure/termination of service (or no less than annually), and three months post case closure/termination of services.
- C. Caseworkers and other program staff as appropriate, record identified unmet client needs in the JFS data base and report to JFS administration quarterly.
- D. Attendees at JFS events and programs will be provided and asked to complete an Event Evaluation Form.
- E. JFS Information Systems maintain data bases that allow for the timely aggregation and analysis of stakeholder input.
- F. JFS administration regularly reviews such input for use in program planning and strategic planning.

X. Non-elected Committees and Councils

JFS encourages the participation of minorities on its Board of Directors through extensive public outreach in promotional materials and events. JFS uses a system of ad hoc committees and work groups that recruit volunteer members with specific experiences and skills relevant to the specific subject or activity. These, although not formal board members, provide oversight reports and analysis directly to the Board. As part of this committee system, the JFS CEO and the Board of Directors have formed a Community Advisory Council which, in its reflection of the JFS client population, will include minority members.

XI. Determination of Site or Location of Facilities

JFS has no current or anticipated plans to develop new transit facilities. If in the future JFS decides to develop new facilities HTC is required to do the following:

Per 49 CFR 21.9(b)(3), recipients may not select the site or location of facilities with the purpose or effect of excluding persons from, denying the benefits of, or subjecting them to discrimination on the basis of race, color, or national origin. Per 49 CFR 21, (The Public Participation Plan), 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. Facilities included are but are not limited to, storage facilities, maintenance facilities, and operations centers. For facilities covered by this provision, recipients are required to:

- 1) Complete a Title VI equity analysis during the planning state with regard to where a project is located to ensure the location is selected without regard to race, color, or national origin, and engage in outreach to persons potentially impacted by siting of facilities. The Title VI equity analysis must compare the equity impacts of various siting alternatives, and the analysis must occur before the selection of the preferred site.
- 2) Give attention to other facilities with similar impacts in the area to determine if any cumulative adverse impacts might result. Analysis should be done at the Census tract or block group level where appropriate to ensure proper analysis of localized impacts.
- 3) Provide substantial legitimate justification for locating a project in a location that will result in a disparate impact on the basis of race, color, or national origin, and show that there are no alternative locations that would have a less disparate impact on the basis of race, color, or national origin. In order to show that both tests have been met, the recipient must consider and analyze alternatives to determine whether those alternatives would have less of a disparate impact on the basis of race, color, or national origin, and then implement the least discriminatory alternative.

JFS has no current or anticipated plans to develop new transit facilities. If in the future JFS decides to develop new facilities HTC is required to do the following:

Per 49 CFR 21.9(b)(3), recipients may not select the site or location of facilities with the purpose or effect of excluding persons from, denying the benefits of, or subjecting them to discrimination on the basis of race, color, or national origin. Per 49 CFR 21, (The Public Participation Plan), 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. Facilities included are but are not limited to, storage facilities, maintenance facilities, and operations centers. For facilities covered by this provision, recipients are required to:

- 4) Complete a Title VI equity analysis during the planning state with regard to where a project is located to ensure the location is selected without regard to race, color, or national origin, and engage in outreach to persons potentially impacted by siting of facilities. The Title VI equity analysis must compare the equity impacts of various siting alternatives, and the analysis must occur before the selection of the preferred site.

5) Give attention to other facilities with similar impacts in the area to determine if any cumulative adverse impacts might result. Analysis should be done at the Census tract or block group level where appropriate to ensure proper analysis of localized impacts.

6) Provide substantial legitimate justification for locating a project in a location that will result in a disparate impact on the basis of race, color, or national origin, and show that there are no alternative locations that would have a less disparate impact on the basis of race, color, or national origin. In order to show that both tests have been met, the recipient must consider and analyze alternatives to determine whether those alternatives would have less of a disparate impact on the basis of race, color, or national origin, and then implement the least discriminatory alternative.



Appendix A Employee Annual Education Form

Title VI Policy

No person 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 financial assistance.

All employees of the Jewish Family Services of Washtenaw County are expected to consider, respect, and observe this policy in their daily work and duties. If a client approaches you with a question or complaint, direct him or her to Elina Zilberberg, COO.

In all dealings with clients, use courtesy titles (i.e. Mr., Mrs., Ms., or Miss) to address them without regard to race, color or national origin.



Appendix B

Acknowledgement of Receipt of Title VI Program

I hereby acknowledge the receipt of the Jewish Family Services of Washtenaw County Title VI Program. I have read the Program and am committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services on the basis of race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1B.

Your signature

Print your name

Date



Appendix C

JEWISH FAMILY SERVICES
of WASHTENAW COUNTY
TITLE VI COMPLAINT FORM

Title VI of the 1964 Civil Rights Act requires that "No person in the United States shall, on the ground 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 financial assistance." If you feel you have been discriminated against in transit services, please provide the following information in order to assist us in processing your complaint and send it to the address on the next page.

Section I:

Name: Address:

Telephone (Home): Telephone (Work):

Electronic 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:

Name: Relationship:

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):

[] Race [] Color [] 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.

Multiple horizontal lines for text entry.



Section IV

Have you previously filed a Title VI complaint with this agency?

Yes No

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

Please provide information about a contact person at the agency/court where the complaint was filed.

Name: _____

Title: _____

Agency: _____

Address: _____

Telephone: _____

Section VI

Name of agency complaint is against: _____

Contact person: _____ Title: _____

Telephone number: _____

You may attach any written material 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:

**Jewish Family Services of Washtenaw County
2245 S. State Street, Ste. 200
Ann Arbor, MI 48104**



APPENDIX D Letter Acknowledging Receipt of Complaint

Today's Date

Ms. Jo Doe
1234 Main St.
Clarksville, Tennessee 37040

Dear Ms. Doe:

This letter is to acknowledge receipt of your complaint against the Jewish Family Services of Washtenaw County alleging_____.

An investigation will begin shortly. If you have additional information you wish to convey or questions concerning this matter, please feel free to contact this office by telephoning (734) 769-0209, or write to me at this address.

Sincerely,

Name
Title VI Coordinator
Jewish Family Services of Washtenaw County
2245 S. State Street, Suite 200
Ann Arbor, MI 48104



APPENDIX E Letter Notifying Complainant that the Complaint Is Substantiated

Today's Date

Ms. Jo Doe
1234 Main St.
Clarksville, Tennessee 37040

Dear Ms. Doe:

The matter referenced in your letter of _____(date) against the Jewish Family Services of Washtenaw County alleging Title VI violation has been investigated.

(An/Several) apparent violation(s) of Title VI of the Civil Rights Act of 1964, including those mentioned in your letter (was/were) identified. Efforts are underway to correct these deficiencies.

Thank you for calling this important matter to our attention. You were extremely helpful during our review of the program. *(If a hearing is requested, the following sentence may be appropriate.)* You may be hearing from this office, or from federal authorities, if your services should be needed during the administrative hearing process.

Sincerely,

Name
Title VI Coordinator
Jewish Family Services of Washtenaw County
2245 S. State Street, Suite 200
Ann Arbor, MI 48104



APPENDIX F Letter Notifying Complainant that the Complaint Is Not Substantiated

Today's Date

Ms. Jo Doe
1234 Main St.
Clarksville, Tennessee 37040

Dear Ms. Doe:

The matter referenced in your complaint of _____ (date) against the Jewish Family Services of Washtenaw County alleging _____ has been investigated.

The results of the investigation did not indicate that the provisions of Title VI of the Civil Rights Act of 1964, had in fact been violated. As you know, Title VI prohibits discrimination based on race, color, or national origin in any program receiving federal financial assistance.

The Jewish Family Services of Washtenaw County has analyzed the materials and facts pertaining to your case for evidence of the city's failure to comply with any of the civil rights laws. There was no evidence found that any of these laws have been violated.

I therefore advise you that your complaint has not been substantiated, and that I am closing this matter in our files.

You have the right to 1) appeal within seven calendar days of receipt of this final written decision from Jewish Family Services of Washtenaw County, and/or 2) file a complaint externally with the U.S. Department of Transportation and/or the Federal Transit Administration at

Federal Transit Administration Office of Civil Rights
Attention: Title VI Program Coordinator
East Building, 5th Floor - TCR
1200 New Jersey Ave., SE
Washington, DC 20590

Thank you for taking the time to contact us. If I can be of assistance to you in the future, do not hesitate to call me.

Sincerely,

Name
Title VI Coordinator
Jewish Family Services of Washtenaw County
2245 S. State Street, Suite 200
Ann Arbor, MI 48104



APPENDIX G

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 ground 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 financial assistance" (42 U.S.C. Section 2000d).

Jewish Family Services of Washtenaw County is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services on the basis of race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1B. **If you feel you are being denied participation in or being denied benefits of the transit services provided by Jewish Family Services of Washtenaw County, or otherwise being discriminated against because of your race, color, national origin, gender, age, or disability, you may contact our office at:**

Attn: Elina Zilberberg
Jewish Family Services of Washtenaw County
2245 S. State St.
Ann Arbor, MI 48104



APPENDIX H Notifying the Public of Rights Under Title VI

JEWISH FAMILY SERVICES OF WASHTENAW COUNTY

- Jewish Family Services of Washtenaw County (JFS) 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 JFS.
- For more information on the JFS civil rights program, and the procedures to file a complaint, contact 734 769-0209; email: elina@jfsann Arbor.org; or visit our office at:

2245 S. State St.

Ann Arbor, MI 49104

APPENDIX I

TABLE DEPICTING MINORITY REPRESENTATION ON COMMITTEES AND COUNCILS SELECTED BY THE RECIPIENT (GENERAL REQUIREMENT)

BODY	Caucasian	African-American	Latino	Asian-American	Native-American
<i>Board of Directors</i>	<i>100%</i>	<i>0%</i>	<i>0%</i>	<i>0%</i>	<i>0%</i>

