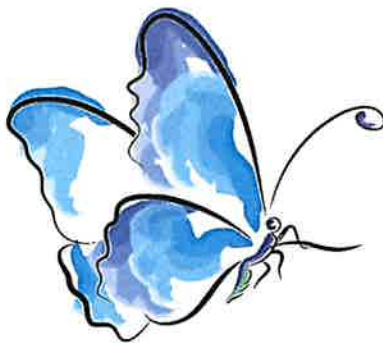


Title VI Plan Cover Page

Adult Care Services, Inc., Adult Day Care Services, Inc. dba The Susan J. Rheem Adult Day Center 2025



Title VI Contact: Yvonne Napolitano, Executive Director

Title VI Contact Phone: 928-771-2335 ext. 121

Title VI Contact Email: yvonne@AdultCareServices.org

TTY Number (If applicable): N/A

Alternate Language Phone: 928-771-2335

Address: 844 Sunset Avenue Prescott, AZ 86305

Web Address: www.AdultCareServices.org

Para Información en Español: Yvonne Napolitano, El Director Ejecutivo

Title VI Plan Table of Contents

Title VI Plan Cover Page.....	1
Title VI Plan Table of Contents	2
Executive Summary	3
Non Discrimination Notice to the Public.....	4
Non Discrimination Notice to the Public - Spanish	5
Non Discrimination ADA/Title VI Complaint Procedures	6
Discrimination ADA/Title VI Complaint Form.....	8
Discrimination ADA/Title VI Investigations, Complaints, and Lawsuits	10
Public Participation Plan.....	11
Limited English Proficiency Plan.....	13
Non-elected Committees Membership Table.....	22
Monitoring for Subrecipient Title VI Compliance.....	22
Title VI Equity Analysis.....	24
Fixed Route Transit Provider Analysis	25
Board Approval for the Title VI Plan.....	26

Executive Summary

Adult Care Services, Inc. is the management company for Adult Day Care Services, Inc. dba The Susan J. Rheem Adult Day Center (SJRC), located in Prescott Valley. Both companies are non-profit 501 (c) (3) organizations with SJRC being founded in 1982 to provide quality care, quality service and enhance the quality of life for adults living with dementia, and other physical and developmental disabilities through a range of supportive day services. SJRC participants access our program through financial and case management support from the Arizona Long Term Care System, Veteran's Administration, and Area Agency on Aging-NACOG. SJRC also accepts private pay for services and offers scholarships for those that qualify and as scholarship funds are available. The SJRC team of nurses, care givers and activity assistants provide health monitoring, social services support, and a full activity schedule offering; socialization, horticulture programming, daily physical exercise, games, activities, brain and cognitive stimulation exercises, entertainment and family caregiver respite. Participants are served a nutritious breakfast, lunch and snack while attending SJRC. Door to door accessible transportation is offered throughout the quad city area. SJRC is open Monday-Friday from 8:00 am - 4:00 pm.

What type of program fund(s) did you apply for?

- ☒ 5310
- ☐ 5311
- ☐ Other (please explain) _____

Type of Funding Requests? (Check all that apply)

- ☐ Vehicle Funds
- ☒ Operating Funds
- ☐ Other (please explain) _____

Is your agency receiving direct funds from FTA?

- ☐ If yes, please attach a copy of your FTA letter of approval of Title VI Plan.
- ☒ No

Non Discrimination Notice to the Public

Notifying the Public of Rights Under Title VI and ADA Adult Care Services, Inc., Adult Day Care Services, Inc. dba The Susan J. Rheem Adult Day Center

Adult Care Services, Inc., Adult Day Care Services, Inc. dba The Susan J. Rheem Adult Day Center operates its programs and services without regard to race, color, national origin or disability in accordance with Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act of 1990 (ADA). Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the **Adult Care Services, Inc., Adult Day Care Services, Inc. dba The Susan J. Rheem Adult Day Center**.

For more information on the **Adult Care Services, Inc., Adult Day Care Services, Inc. dba The Susan J. Rheem Adult Day Center's** civil rights program, and the procedures to file a complaint, contact **Yvonne Napolitano, Executive Director, 928-771-2335 ext. 121, (TTY N/A); email yvonne@AdultCareServices.org**; or visit our administrative office at **844 Sunset Avenue Prescott, AZ 86305**. For more information, visit **www.AdultCareServices.org**.

Complaints may be filed directly with the Arizona Department of Transportation (**ADOT**) **Civil Rights Office**. ATTN: Title VI Program Coordinator 1801 W. Jefferson St. MD 154A Ste. 101 Phoenix, AZ 85007 or with the Federal Transit Administration (**FTA**). ATTN: Title VI Program Coordinator, 1200 New Jersey Ave., SE Washington DC 20590

If information is needed in another language, contact **928-771-2335**. *Para información en Español llame: **Yvonne Napolitano, El Director Ejecutivo**

Non Discrimination Notice to the Public - Spanish

Aviso Público Sobre los Derechos Bajo el Título VI Y ADA Adult Care Services, Inc., Adult Day Care Services, Inc. dba The Susan J. Rheem Adult Day Center

Adult Care Services, Inc., Adult Day Care Services, Inc. dba The Susan J. Rheem Adult Day Center (y sus subcontratistas, si cualquiera) asegura cumplir con el Título VI de la Ley de los Derechos Civiles de 1964, Sección 504 de la Ley de Rehabilitación de 1973 y La Ley de ciudadanos Americanos con Discapacidades de 1990 (ADA). El nivel y la calidad de servicios de transporte serán proveídos sin consideración a su raza, color, país de origen, o discapacidad.

Para obtener más información sobre el programa de Derechos Civiles de **Adult Care Services, Inc., Adult Day Care Services, Inc. dba The Susan J. Rheem Adult Day Center**, y los procedimientos para presentar una queja, contacte **Yvonne Napolitano, Executive Director 928-771-2335 ext. 121, (TTY N/A)**; o visite nuestra oficina administrativa en **844 Sunset Avenue Prescott, AZ 86305**. Para obtener más información, visite **www.AdultCareServices.org**

Una queja puede ser presentada con la oficina de Derechos Civiles del Departamento de Transporte de Arizona (**ADOT**). Atención: Title VI Program Manager, 206 S. 17th Ave MD 155A Phoenix AZ, 85007 o con la Administración Federal de Transporte (**FTA**). Atención: Title VI Coordinator, 1200 New Jersey Ave., SE Washington DC 20590

The above notice is posted in the following locations:

- **Adult Care Services Building (hallway)**
- **The Susan J Rheem Adult Day Center (dining room)**
- The notice is also posted online at **www.AdultCareServices.org**

Non Discrimination ADA/Title VI Complaint Procedures

These procedures provide guidance for all complaints filed under Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act of 1990 (ADA) as they relate to any program or activity that is administered by **Adult Care Services, Inc., Adult Day Care Services, Inc. dba The Susan J. Rheem Adult Day Center** including consultants, contractors and vendors. Intimidation or retaliation as a result of a complaint is prohibited by law. In addition to these procedures, complainants reserve the right to file a formal complaint with other State or Federal agencies or to seek private counsel for complaints alleging discrimination. Every effort will be made to resolve complaints at the lowest possible level.

- (1) Any person who believes he and/or she has been discriminated against on the basis of race, color, national origin, or disability may file a Discrimination complaint by completing and submitting the agency's Title VI Complaint Form.
- (2) Formal complaints must be filed within **180** calendar days of the last date of the alleged act of discrimination or the date when the alleged discrimination became known to the complainant(s), or where there has been a continuing course of conduct, the date on which the conduct was discontinued or the latest instance of the conduct.
- (3) Complaints must be in writing to the ADA Coordinator Yvonne Napolitano at 928-771-2335 ext. 121 or yvonne@AdultCareServices.org and signed by the complainant(s) and must include the complainant(s) name, address and phone number. The ADA/Title VI contact person will assist the complainant with documenting the issues if necessary.
- (4) Allegations received by fax or e-mail will be acknowledged and processed, once the identity of the complainant(s) and the intent to proceed with the complaint have been established. For this, the complainant is required to mail a signed, original copy of the fax or email transmittal for the complaint to be processed.
- (5) Allegations received by telephone will be reduced to writing and provided to the complainant for confirmation or revision before processing. A complaint form will be forwarded to the complainant for him/her to complete, sign and return for processing.
- (6) Once submitted **Adult Care Services, Inc., Adult Day Care Services, Inc. dba The Susan J. Rheem Adult Day Center** will review the complaint form to determine jurisdiction. All complaints will receive an acknowledgement letter informing her/him whether the complaint will be investigated by the **Adult Care Services, Inc., Adult Day Care Services, Inc. dba The Susan J. Rheem Adult Day Center** or submitted to the State or Federal authority for guidance.

- (7) **Adult Care Services, Inc., Adult Day Care Services, Inc. dba The Susan J. Rheem Adult Day Center** will notify the ADOT Civil Rights Office of ALL Discrimination complaints within 72 hours via telephone at 602-712-8946; or email at civilrightsoffice@azdot.gov.
- (8) **Adult Care Services, Inc., Adult Day Care Services, Inc. dba The Susan J. Rheem Adult Day Center** has 60 business days to investigate the complaint. If more information is needed to resolve the case, the Authority may contact the complainant. The complainant has 10 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 10 business days, the Authority can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.
- (9) After the investigator reviews the complaint, she/he will issue one of two letters to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Discrimination violation and that the case will be closed. An LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member or other action will occur.
- (10) A copy of either the closure letter or LOF must be also be submitted to ADOT within **72** hours of that decision. Letters may be submitted by hardcopy or email.
- (11) A complainant dissatisfied with **Adult Care Services, Inc., Adult Day Care Services, Inc. dba The Susan J. Rheem Adult Day Center** decision may file a complaint with the Arizona Department of Transportation (**ADOT**) or the Federal Transit Administration (**FTA**) offices of Civil Rights: **ADOT**: ATTN ADA/Title VI Program Coordinator 206 S. 17TH Ave MD 155A RM: 183 Phoenix AZ, 85007 **FTA**: Attention Title VI Program Coordinator, East Building, 5th Floor-TCR 1200 New Jersey Ave., SE Washington DC 20590
- (12) A copy of these procedures can be found online at: **www.AdultCareServices.org**.

If information is needed in another language, contact **928-771-2335**. *Para información en Español llame: **Yvonne Napolitano, El Director Ejecutivo**

Discrimination ADA/Title VI Complaint Form

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
<i>*If you answered "yes" to this question, go to Section III.</i>		
If not, please supply the name and relationship of the person for whom you are complaining.		
Please explain why you have filed for a third party:		
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.	☐ Yes	☐ No
Section III:		
I believe the discrimination I experienced was based on (check all that apply):		
☐ Race	☐ Color	☐ National Origin ☐ Disability
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 VI:		
Have you previously filed a Discrimination Complaint with this agency?	☐ Yes	☐ No

If yes, please provide any reference information regarding your previous complaint.

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: _____

Name of person complaint is against: _____

Title: _____

Location: _____

Telephone Number (if available): _____

You may attach any written materials or other information that you think is relevant to your complaint.
Your signature and date are **required** below:

Signature

Date

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

Adult Care Services, Inc., Adult Day Care Services, Inc. dba The Susan J. Rheem Adult Day Center
Yvonne Napolitano, Executive Director
844 Sunset Avenue Prescott, AZ 86305
928-771-2335 ext. 121
yvonne@AdultCareServices.org

A copy of this form can be found online at **www.AdultCareServices.org**

Discrimination ADA/Title VI Investigations, Complaints, and Lawsuits

☒ **Adult Care Services, Inc., Adult Day Care Services, Inc. dba The Susan J. Rheem Adult Day Center** has not had any ADA nor Title VI Discrimination complaints, investigations, or lawsuits in **FY 23/24**.

Complainant	Date (Month, Day, Year)	Basis of Complaint (Race, Color, National Origin or Disability)	Summary of Allegation	Status	Action(s) Taken	Final Findings?
Investigations	0					
1)						
2)						
Lawsuits	0					
1)						
2)						
Complaints	0					
1)						
2)						

Public Participation Plan

Adult Care Services is engaging the public in its planning and decision-making processes, as well as its marketing and outreach activities. The public will be invited to participate in the process whether through public meetings or surveys. As an agency receiving federal financial assistance, **Adult Care Services** the following community outreach efforts:

Adult Care Services, Inc., educates the public regarding the services we provide, including transportation, through our website www.adultcareservice.org, rack cards/brochures (distributed throughout Yavapai County), in magazine/newspaper ads, on radio stations, display advertising) and social media. Adult Care Services Inc., also, hosts and participates numerous events and informational sessions throughout Yavapai County, holds meetings with local healthcare provides, and has contracts with Northern Arizona Council of Governments (NAGOC), Veteran's Association, Child and Adult Care Food Program and Arizona Long Term Care in order to get the word out about our services.

In the upcoming year **Adult Care Services** will make the following community outreach efforts:

Adult Care Services, Inc., will continue to educate the public regarding the services we provide, including transportation, through our website www.adultcareservice.org, rack cards/brochures (distributed all over Yavapai County), in magazine/newspaper ads, on radio stations, display advertising) and social media. Adult Care Services Inc., also, hosts and participates numerous events and informational sessions throughout Yavapai County, holds meetings with local healthcare provides, and has contracts with Northern Arizona Council of Governments (NAGOC), Veteran's Association, Child and Adult Care Food Program and Arizona Long Term Care in order to get the word out about our services.

If there is transportation fee change for our private pay clients Adult Care Services will send out a written 30-day notice and update the intake paperwork.

Adult Care Services has deviated fixed routes – these routes operate in the same general vicinity but pick up and drop off locations are directly to our participant's homes and change dependent on who is attending SJRC on that particular day.

Adult Care Services is a private nonprofit and does not hold public meetings or hearings on transportation. We host events at our day center for community members who may want to by example learn about dementia, funding available through the ALTCS, VA, NACOG or end of life planning. If the day center is marketing their services we may discuss transportation as well as other services but many times these community events are to help educate the population on other services available.

- ☒ Expanded the distribution of agency brochures
- ☒ Advertised public announcements through newspapers, fliers, or radio

- ☒ Posted the Nondiscrimination Public Notices to the following locations:
 - ☒ Within transportation vehicles
 - ☒ Agency gathering areas
- ☒ Partnered with other local agencies to advertise services provided
- ☒ Added public interactive content to the agency's webpage for the public e.g. social media, to communicate schedule changes or activities (Please provide a web link here)
- ☒ Hosted an information booth at a community event:
 - Senior Referral Network
 - Walk to End Alzheimer's
- ☒ Updated agency documents/publications to make them more user-friendly e.g. comment forms or agency brochures

Adult Care Services, Inc., Adult Day Care Services, Inc. dba The Susan J. Rheem Adult Day Center will make the following community outreach efforts for the **upcoming year**:

- ☒ Expand the distribution of agency brochures
- ☒ Advertise public announcements through newspapers, fliers, or radio
- ☒ Post the Nondiscrimination Public Notices to the following locations:
 - ☒ Within transportation vehicles
 - ☒ Agency information boards
- ☒ Partner with other local agencies to advertise services provided.
- ☒ Host public information meetings and or hearings.
- ☒ Add public interactive content to the agency's webpage for the public e.g. social media, to communicate schedule changes or activities. <https://www.Facebook.com/AdultCareServices>
- ☒ Host an information booth at a community event
 - Senior Referral Network
 - Walk to End Alzheimer's
- ☒ Update agency documents/publications to make them more user-friendly e.g. comment forms or agency brochures.

Limited English Proficiency Plan

Adult Care Services, Inc., Adult Day Care Services, Inc. dba The Susan J. Rheem Adult Day Center has developed the following Limited English Proficiency Plan (LEP) to help identify reasonable steps to provide language assistance for LEP persons seeking meaningful access to **Adult Care Services, Inc., Adult Day Care Services, Inc. dba The Susan J. Rheem Adult Day Center** services as required by Executive Order 13166. A Limited English Proficiency person is one who does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English.

This plan details procedures on how to identify a person who may need language assistance, the ways in which assistance may be provided, training to staff, notification to LEP persons that assistance is available, and information for future plan updates. In developing the plan while determining the **Adult Care Services, Inc., Adult Day Care Services, Inc. dba The Susan J. Rheem Adult Day Center's** extent of obligation to provide LEP services, the **Adult Care Services, Inc., Adult Day Care Services, Inc. dba The Susan J. Rheem Adult Day Center** undertook a U.S. Department of Transportation four-factor LEP analysis which considers the following:

- 1) The number or proportion of LEP persons eligible in the **Adult Care Services, Inc., Adult Day Care Services, Inc. dba The Susan J. Rheem Adult Day Center** service area who may be served or likely to encounter by **Adult Care Services, Inc., Adult Day Care Services, Inc. dba The Susan J. Rheem Adult Day Center** program, activities, or services; **See Below Four Charts.**

Chart 1--Yavapai County, AZ Population Estimates base, April 1, 2020 (V2022)

Race and Hispanic Origin

White alone, percent	92.9%
Black or African American alone, percent(a)	1.0%
American Indian and Alaska Native alone, percent(a)	2.2%
Asian alone, percent(a)	1.3%
Native Hawaiian and Other Pacific Islander alone, percent(a)	0.2%
Two or More Races, percent	2.4%
Hispanic or Latino, percent(b)	15.3%
White alone, not Hispanic or Latino, percent	79.3%

Chart 2— Languages Spoken at Home by Ability to Speak English for the Population 5 Years and Over

	Yavapai County, Arizona (2015 data available)	
Label	Estimate	Margin of Error
Total:	206,720	*****
Speak only English	185,224	±1,367
Spanish or Spanish Creole:	16,104	±1,168
Speak English "very well"	9,804	±886
Speak English less than		
"very well"	6,300	±840
French (incl. Patois, Cajun):	726	±225
Speak English "very well"	618	±217
Speak English less than		
"very well"	108	±78
French Creole:	3	±7
Speak English "very well"	3	±7
Speak English less than		
"very well"	0	±29
Italian:	470	±203
Speak English "very well"	344	±152
Speak English less than		
"very well"	126	±90
Portuguese or Portuguese		
Creole:	61	±63
Speak English "very well"	60	±63
Speak English less than		
"very well"	1	±2
German:	1,007	±387
Speak English "very well"	879	±329
Speak English less than		
"very well"	128	±97
Yiddish:	0	±29
Speak English "very well"	0	±29
Speak English less than		
"very well"	0	±29
Other West Germanic		
languages:	214	±121
Speak English "very well"	192	±119
Speak English less than		
"very well"	22	±24
Scandinavian languages:	217	±127
Speak English "very well"	195	±125

Speak English less than		
"very well"	22	±28
Greek:	108	±102
Speak English "very well"	108	±102
Speak English less than		
"very well"	0	±29
Russian:	58	±56
Speak English "very well"	52	±51
Speak English less than		
"very well"	6	±10
Polish:	122	±82
Speak English "very well"	100	±79
Speak English less than		
"very well"	22	±25
Serbo-Croatian:	25	±28
Speak English "very well"	25	±28
Speak English less than		
"very well"	0	±29
Other Slavic languages:	114	±77
Speak English "very well"	103	±76
Speak English less than		
"very well"	11	±17
Armenian:	0	±29
Speak English "very well"	0	±29
Speak English less than		
"very well"	0	±29
Persian:	147	±90
Speak English "very well"	67	±55
Speak English less than		
"very well"	80	±82
Gujarati:	49	±64
Speak English "very well"	49	±64
Speak English less than		
"very well"	0	±29
Hindi:	0	±29
Speak English "very well"	0	±29
Speak English less than		
"very well"	0	±29
Urdu:	23	±38
Speak English "very well"	23	±38
Speak English less than		
"very well"	0	±29
Other Indic languages:	0	±29

Speak English "very well"	0	±29
Speak English less than		
"very well"	0	±29
Other Indo-European		
languages:	42	±42
Speak English "very well"	20	±34
Speak English less than		
"very well"	22	±25
Chinese:	186	±130
Speak English "very well"	112	±110
Speak English less than		
"very well"	74	±70
Japanese:	140	±102
Speak English "very well"	118	±100
Speak English less than		
"very well"	22	±29
Korean:	123	±81
Speak English "very well"	67	±52
Speak English less than		
"very well"	56	±54
Mon-Khmer, Cambodian:	3	±6
Speak English "very well"	0	±29
Speak English less than		
"very well"	3	±6
Hmong:	67	±109
Speak English "very well"	53	±85
Speak English less than		
"very well"	14	±24
Thai:	34	±39
Speak English "very well"	10	±19
Speak English less than		
"very well"	24	±35
Laotian:	0	±29
Speak English "very well"	0	±29
Speak English less than		
"very well"	0	±29
Vietnamese:	119	±95
Speak English "very well"	39	±40
Speak English less than		
"very well"	80	±67
Other Asian languages:	76	±68
Speak English "very well"	42	±54

Speak English less than "very well"	34	±47
Tagalog:	94	±78
Speak English "very well"	94	±78
Speak English less than "very well"	0	±29
Other Pacific Island languages:	12	±20
Speak English "very well"	0	±29
Speak English less than "very well"	12	±20
Navajo:	347	±153
Speak English "very well"	326	±153
Speak English less than "very well"	21	±48
Other Native North American languages:	526	±297
Speak English "very well"	482	±298
Speak English less than "very well"	44	±38
Hungarian:	30	±37
Speak English "very well"	30	±37
Speak English less than "very well"	0	±29
Arabic:	52	±48
Speak English "very well"	48	±47
Speak English less than "very well"	4	±6
Hebrew:	47	±53
Speak English "very well"	2	±7
Speak English less than "very well"	45	±54
African languages:	110	±81
Speak English "very well"	58	±64
Speak English less than "very well"	52	±52
Other and unspecified languages:	40	±35
Speak English "very well"	14	±22
Speak English less than "very well"	26	±27

**Chart 3--Yavapai County 2015 Language Map:
Language other than English Spoken at Home**

Geography	FIPS Code	Rank	Total Population	Total LEP	Total LEP Percent
Arizona	04	>500K AND ≤1M	6033147	574452	9.522
Yavapai County, Arizona	04025	>1K AND ≤10K	201991	7521	3.723

Chart 4—SJRC Participant Data FY 23/24

Racial Category	Enrolled Participants	Enrolled %
White	113	91%
Hispanic	7	6%
Black or African American	2	2%
Asian	0	0%
Other	2	1%

- 2) The frequency with which LEP individuals come in contact with an **Adult Care Services, Inc., Adult Day Care Services, Inc. dba The Susan J. Rheem Adult Day Center** services;

Adult Care Services, Inc., Adult Day Care Services, Inc. dba The Susan J. Rheem Adult Day Center's staff reviewed the frequency with which office staff, dispatchers and drivers have, or could have, contact with LEP persons for **FY 23/24**. **Adult Care Services, Inc., Adult Day Care Services, Inc. dba The Susan J. Rheem Adult Day Center** averages **NUMBER OF LEP CONTACTS** per **2.2--day/11--Week/44--month/528--year**.

- 3) The nature and importance of the program, activities or services provided by the **Adult Care Services, Inc., Adult Day Care Services, Inc. dba The Susan J. Rheem Adult Day Center** to the LEP population.
- 4) The resources available to **Adult Care Services, Inc., Adult Day Care Services, Inc. dba The Susan J. Rheem Adult Day Center** and overall costs to provide LEP assistance. A brief description of these considerations is provided in the following section.

Adult Care Services, Inc., Adult Day Care Services, Inc. dba The Susan J. Rheem Adult Day Center provides a statement in Spanish and will for additional languages specific to the LEP community make up that will

be included in all public outreach notices. Every effort will be made to provide vital information to LEP individuals in the language requested.

Safe Harbor Provision for written translations

Adult Care Services, Inc., Adult Day Care Services, Inc. dba The Susan J. Rheem Adult Day Center complies with the Safe Harbor Provision, as evidenced by the number of documents available in the Spanish language. With respect to Title VI information, the following shall be made available in Spanish:

- (1) Non Discrimination Notice
- (2) Discrimination Complaint Procedures
- (3) Discrimination Complaint Form

In addition, we will conduct our marketing (including using translated materials) in a manner that reaches each LEP group. Vital documents include the following:

- (1) Notices of free language assistance for persons with LEP
- (2) Notice of Non-Discrimination and Reasonable Accommodation
- (3) Outreach Materials
- (4) Bus Schedules
- (5) Route Changes
- (6) Public Hearings

1) Adult Care Services, Inc., Adult Day Care Services, Inc. dba The Susan J. Rheem Adult Day Center provides language assistance services through the below methods:

- ☒ Staff is provided a list of what written and oral language assistance products and methods the agency has implemented and how agency staff can obtain those services.
- ☒ Instructions are provided to customer service staff and other **Adult Care Services, Inc., Adult Day Care Services, Inc. dba The Susan J. Rheem Adult Day Center** staff who regularly take phone calls from the general public on how to respond to an LEP caller.
- ☒ Instructions are provided to vehicle operators, station managers, and others who regularly interact with the public on how to respond to an LEP customer.
- ☒ Bilingual or multilingual versions of:
 - ☒ Safety and security announcements
 - ☒ Service change announcements
- ☒ List other Translation Apps, i.e. Google for verbal or written communications as necessary.

2) Adult Care Services, Inc., Adult Day Care Services, Inc. dba The Susan J. Rheem Adult Day Center has a process to ensure the competency of interpreters and translation service through the following methods:

Adult Care Services, Inc., Adult Day Care Services, Inc. dba The Susan J. Rheem Adult Day Center will ask the interpreter or translator to demonstrate that he or she can communicate or translate information

accurately in both English and the other language. **Adult Care Services, Inc., Adult Day Care Services, Inc. dba The Susan J. Rheem Adult Day Center** will train the interpreter or translator in specialized terms and concepts associated with the agency's policies and activities. **Adult Care Services, Inc., Adult Day Care Services, Inc. dba The Susan J. Rheem Adult Day Center** will instruct the interpreter or translator that he or she should not deviate into a role as counselor, legal advisor, or any other role aside from interpreting or translator. **Adult Care Services, Inc., Adult Day Care Services, Inc. dba The Susan J. Rheem Adult Day Center** will ask the interpreter or translator to attest that he or she does not have a conflict of interest on the issues that they would be providing interpretation services.

3) **Adult Care Services, Inc., Adult Day Care Services, Inc. dba The Susan J. Rheem Adult Day Center** provides notice to LEP persons about the availability of language assistance through the following methods:

- ☒ Posting signs in intake areas and other points of entry
- ☒ Signs and handouts available in vehicles
- ☒ Agency websites

4) **Adult Care Services, Inc., Adult Day Care Services, Inc. dba The Susan J. Rheem Adult Day Center** monitors, evaluates and updates the LEP plan through the following process:

Adult Care Services, Inc., Adult Day Care Services, Inc. dba The Susan J. Rheem Adult Day Center will monitor the LEP plan by conducting an annual Four-Factor analysis, establishing a process to obtain feedback from internal staff and members of the public and conducting internal evaluations to determine whether the language assistance measures are working for staff. **Adult Care Services, Inc., Adult Day Care Services, Inc. dba The Susan J. Rheem Adult Day Center** will make changes to the language assistance plan based on feedback received. **Adult Care Services, Inc., Adult Day Care Services, Inc. dba The Susan J. Rheem Adult Day Center** may take into account the cost of proposed changes and the resources available to them. Depending on the evaluation, **Adult Care Services, Inc., Adult Day Care Services, Inc. dba The Susan J. Rheem Adult Day Center** may choose to disseminate more widely those language assistance measures that are particularly effective or modify or eliminate those measures that have not been effective. **Adult Care Services, Inc., Adult Day Care Services, Inc. dba The Susan J. Rheem Adult Day Center** will consider new language assistance needs when expanding transit service into areas with high concentrations of LEP persons will consider modifying their implementation plan to provide language assistance measures to areas not previously served by the agency.

5) **Adult Care Services, Inc., Adult Day Care Services, Inc. dba The Susan J. Rheem Adult Day Center** trains employees to know their obligations to provide meaningful access to information and services for LEP persons and all employees in public contact positions will be properly trained to work effectively with in-person and telephone interpreters. **Adult Care Services, Inc., Adult Day Care Services, Inc. dba The Susan J. Rheem Adult Day Center** will implement processes for training of staff through the following procedures:

Adult Care Services, Inc., Adult Day Care Services, Inc. dba The Susan J. Rheem Adult Day Center will identify staff that are likely to come into contact with LEP persons as well as management staff that have frequent contact with LEP persons in order to target training to the appropriate staff. **Adult Care Services, Inc., Adult Day Care Services, Inc. dba The Susan J. Rheem Adult Day Center** will identify existing staff training opportunities, as it may be cost-effective to integrate training on their responsibilities to persons with limited English proficiency into agency training that occurs on an ongoing basis. **Adult Care Services, Inc., Adult Day Care Services, Inc. dba The Susan J. Rheem Adult Day Center** will include this training as part of the orientation for new employees. Existing employees, especially managers and those who work with the public may periodically take part in re-training or new training sessions to keep up to date on their responsibilities to LEP persons. **Adult Care Services, Inc., Adult Day Care Services, Inc. dba The Susan J. Rheem Adult Day Center** will implement LEP training to be provided for agency staff. **Adult Care Services, Inc., Adult Day Care Services, Inc. dba The Susan J. Rheem Adult Day Center** staff training for LEP to include:

- A summary of the **Adult Care Services, Inc., Adult Day Care Services, Inc. dba The Susan J. Rheem Adult Day Center** responsibilities under the DOT LEP Guidance;
- A summary of the **Adult Care Services, Inc., Adult Day Care Services, Inc. dba The Susan J. Rheem Adult Day Center** language assistance plan;
- A summary of the number and proportion of LEP persons in the **Adult Care Services, Inc., Adult Day Care Services, Inc. dba The Susan J. Rheem Adult Day Center** service area, the frequency of contact between the LEP population and the agency's programs and activities, and the importance of the programs and activities to the population;
- A description of the type of language assistance that the agency is currently providing and instructions on how agency staff can access these products and services; and
- A description of the **Adult Care Services, Inc., Adult Day Care Services, Inc. dba The Susan J. Rheem Adult Day Center** cultural sensitivity policies and practices.

Non-elected Committees Membership Table

Subrecipients who select the membership of transit-related, non-elected planning boards, advisory councils, or committees must provide a table depicting the membership of those organizations broken down by race. Subrecipients also must include a description of the efforts made to encourage participation of minorities on these boards, councils, and committees.

*Table Depicting Membership of Committees, Councils, Broken Down by Race

Body	African American/ Black	American Indian/Alaskan Native	Native Hawaiian/ Other Pacific Islander	Asian	Hispanic/ Latino	White
Population	0%	0%	0%	0%	0%	100%
Adult Care Services, Inc. Board	0%	0%	0%	0%	0%	100%
Adult Day Care Services, Inc. Board	0%	0%	0%	0%	0%	100%
Adult Residential Care Services, Inc.	0%	0%	0%	0%	0%	100%

Adult Care Services welcomes participation of all minorities on committees such as posting for volunteers in the newspaper.

Monitoring for Subrecipient Title VI Compliance

☒ **Adult Care Services, Inc., Adult Day Care Services, Inc. dba The Susan J. Rheem Adult Day Center** does **NOT** monitor subrecipients for Title VI compliance.

Title VI Equity Analysis

A subrecipient planning to acquire land to construct certain types of facilities must not discriminate on the basis of race, color, or national origin, against persons who may, as a result of the construction, be displaced from their homes or businesses. "Facilities" in this context does not include transit stations or bus shelters, but instead refers to storage facilities, maintenance facilities, and operation centers.

There are many steps involved in the planning process prior to the actual construction of a facility. It is during these planning phases that attention needs to be paid to equity and non-discrimination through equity analysis. The Title VI Equity Analysis must be done before the selection of the preferred site.

Note: Even if facility construction is financed with non-FTA funds, if the subrecipient organization receives any FTA dollars, it must comply with this requirement.

☒ **Adult Care Services, Inc., Adult Day Care Services, Inc. dba The Susan J. Rheem Adult Day Center** has no current or anticipated plans to develop new transit facilities covered by these requirements

Fixed Route Transit Provider Analysis

Fixed Route: Public transit service (other than by aircraft) provided on a repetitive, fixed-schedule basis along a specific route, with vehicles stopping to pick up passengers.

A subrecipient providing fixed route service, as defined above, must determine the distribution of transit amenities or the vehicle assignments for each mode in a non-discriminatory manner. The subrecipient must develop policies to ensure service is not distributed on the basis of race, color, or national origin.

Effective practices to fulfill the Service Standards requirements include developing written policies covering each of the following service indicators: (can be expressed in writing or in table format – see Circular Appendix G & H pp. 87-91)

☒ **Adult Care Services, Inc., Adult Day Care Services, Inc. dba The Susan J. Rheem Adult Day Center** is **not** a Fixed Route Transit Provider

Adult Day Care Services, Inc.
Board of Directors Meeting Minutes, July 24, 2025

Present

Bob Beyea
Michael Geboy
Lynn Harris
Bob Dressler

Absent

Mickey White
Lisa Reyes
Kelly Paradis

Staff: Yvonne Napolitano, Sandy Bigelow

Call to Order: A quorum was present and Lynn called the meeting to order.

2025 Title VI ADOT Plan

Yvonne discussed the new Title VI ADOT plan that we are required to develop and approved.
Following discussion, the following motion was made

Motion: Approve the new Title VI ADOT plan as presented (Michael, 2nd Bob B) Unanimously approved.

Board Approval for the Title VI Plan

***(INSERT A COPY OF THE BOARD MEETING MINUTES AFTER
CONDITIONAL CRO APPROVAL. BOARD MINUTES MUST BE FOR THE
YEAR OF THE GRANT APPLICATION CYCLE)**