

TURN COMMUNITY SERVICES, INC.



TITLE VI SUBRECIPIENT PLAN Non-Discrimination in the Federal Transit Program

February 2024
(Revised)

TURN COMMUNITY SERVICES, INC.

Policy on Title VI

The Agency affirms:

1. Title VI of the Civil Rights Act of 1964 prohibits discrimination in federally assisted programs. Title VI was amended by the Civil Rights Restoration Act of 1987 (P.L. 100-259), effective March 22, 1988, which added Section 606, expanding the definition of the terms “programs or activities” to include all the operations of an educational institution, governmental entity, or private employer that receives federal funds if any one operation receives federal funds.
2. TURN Community Services, Inc. is a Private, Not-for-Profit corporation. It is the policy of TURN Community Services, Inc. to ensure compliance with Title VI of the Civil Rights Act of 1964 and all related statutes or regulations in all programs and activities so administered.
3. TURN Community Services, Inc. Title VI Coordinator is granted the authority to administer and monitor the Title VI Plan as promulgated under Title VI of the Civil Rights Act of 1964 and any subsequent legislation. The Title VI Coordinator will provide assistance as needed.
4. TURN Community Services, Inc. will take all steps to ensure that no person shall, on the grounds of race, color, or national origin, be excluded from participation in, or be denied the benefits of, or be subjected to discrimination under any program or activity of the Agency.
5. The Agency recognizes the need for annual Title VI training for Agency personnel.



Chair, Board of Directors,
TURN Community Services, Inc

02/22/2024

Date

TURN COMMUNITY SERVICES, INC.

UDOT Compliance/Monitoring Review and Training

TURN Community Services, Inc. agrees to participate in on-site reviews and cooperate with Compliance Staff throughout the review process.

In conducting on-site reviews, the UDOT Rural Public Transit Compliance Officer looks for the following:

1. Clearly displayed Title VI posters with the required information (in vehicles, in public spaces, and on the Agency website)
 - a. Description of Title VI
 - b. Explanation of how to obtain Title VI information.
 - c. Explanation of how to file a complaint.
 - d. Available complaint forms
2. Current file containing complaints.
3. UDOT conducts periodic on-site monitoring assessments to determine the subrecipient's compliance with the FTA Title VI regulations. These reviews include service measurements, location of transit service and facilities, participation opportunities in the transit planning and decision-making processes, and communication needs of persons with Limited English Proficiency (LEP).

TURN Community Services, Inc. agrees to participate in training that includes Title VI and its requirements. The UDOT RPT Compliance Officer presents the following:

1. Introduces Title VI and its requirements for compliance.
 - a. Provides information regarding outreach opportunities to minority populations and demographic information.
2. Provides sample Title VI posters (including required signatures and contact information)
 - a. Discusses required poster locations.
3. Discusses LEP and provides the sample UDOT LEP tools.
4. Discusses Title VI complaint forms.
5. Provides sample Title VI complaint forms.
6. Discusses the required maintenance of a Title VI file readily available for review.
7. Discusses the reporting requirements and the annual Certification and Assurances
 - a. Discusses the required Title VI verification, including a description of lawsuits and complaints for the past year.

In addition to new subrecipients, training by the UDOT RPT Compliance Officer and UDOT Civil Rights staff is also conducted as requested and as changes in the law occur, as needed. Both the Compliance Officer and the Civil Rights staff are also available any time as a technical resource for questions or concerns regarding Title VI and its requirements.

Certification and Assurance Submission

TURN Community Services, Inc. agrees to submit the annual Title VI assurance to UDOT as part of the annual Certification and Assurance submission.

Title VI Complaint Procedures

UDOT investigates and tracks Title VI complaints filed with UDOT against subrecipients.

Procedure for Investigations, Complaints and Lawsuits

UDOT has developed and maintains a list of any active investigations conducted by entities other than FTA, lawsuits, or complaints naming the recipient and/or subrecipients that allege discrimination on the basis of race, color, or national origin. This list includes the date the investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by the recipient or subrecipient in response to the investigation.

TURN COMMUNITY SERVICES, INC.

Title VI Complaint Procedure and Investigation Guidelines

TURN Community Services, Inc. has developed procedures for investigating and tracking Title VI complaints filed against them and has made those procedures for filing a complaint available to the public. TURN Community Services' complaint procedure is outlined below:

Complaint Procedure

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by TURN Community Services, Inc. may file a Title VI complaint by completing and submitting the Agency's Title VI Complaint Form. TURN Community Services, Inc. investigates complaints received no more than 180 calendar days after the alleged incident. The TURN Community Services, Inc. will process complaints that have completed all elements of the complaint form.

Once the complaint is received, the TURN Community Services, Inc. will review it to determine if TURN Community Services, Inc. has jurisdiction. The complainant will receive an acknowledgment letter informing her/him whether the complaint will be investigated by TURN Community Services, Inc.

The TURN Community Services, Inc. has 10 business days to investigate the complaint. If more information is needed to resolve the case, TURN Community Services, Inc. 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 investigator can administratively close the case. A case can also be administratively closed if the complainant no longer wishes to pursue the case.

After the investigator reviews the complaint, TURN Community Services, Inc. will issue one of two letters to the complainant:

1. A closure letter that summarizes the allegations and states there was not a Title VI violation and that the case will be closed.
2. A Letter of Finding (LOF) that summarizes the allegations and the interviews regarding the alleged incident, and explains if any disciplinary action, additional training of the staff member or other action will occur.

If the complainant wishes to appeal the decision, she/he has 10 calendar days after the date of the closure letter or the LOF to do so. If an appeal has been submitted, TURN Community Services, Inc. will forward appeals to the UDOT Civil Rights Title VI Coordinator within 10 days.

When a complaint has been directly filed with another state or federal agency, TURN Community Services, Inc. or UDOT is to inform the Title VI Coordinator where the complaint has been filed and coordinate any action needed by TURN Community Services, Inc. or UDOT to resolve the complaint.

A person may also file a complaint directly with the Utah Department of Transportation at:

Utah Department of Transportation
Attn: Title VI Coordinator
4501 South 2700 West, P.O. Box 141265
Salt Lake City, UT 84114-1265

A person 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

Title VI Informal Complaint Policy

Title VI complaints may be resolved by informal means. When informal means are utilized, the complainant must be informed of their right to file a formal written complaint. Such informal attempts and their results will be summarized by TURN Community Services' identified Title VI Coordinator. The coordinator will log the complaint in the required complaint log (see Appendix D for a sample). If the complaint cannot be resolved informally, TURN Community Services' identified Title VI Coordinator must inform the complainant of the formal process outlined above and instruct the complainant on how to proceed.

Title VI Log of Complaints/Lawsuits, etc.

TURN Community Services, Inc. will prepare and maintain a list of any alleged discrimination on the basis of race, color, or national origin, including any active investigations conducted by entities other than FTA, lawsuits, and complaints naming TURN Community Services, Inc. or UDOT. The list will include the date that the investigation, lawsuit, or complaint was filed; a summary of the allegation(s) and date resolved. See Appendix D for sample complaint log.

TURN COMMUNITY SERVICES, INC.

Title VI Notice to Beneficiaries

TURN Community Services, Inc. will provide information to the public regarding TURN Community Services' obligations under FTA's Title VI regulations and apprise members of the public of the protection against discrimination afforded to them by Title VI. At a minimum, TURN Community Services, Inc. shall disseminate this information to the public by posting the notice on its website and local TURN Community Services, Inc. will document where and when this information is posted.

TURN Community Services, Inc. will widely distribute its Title VI plan. The Title VI notifications are also included with all newly printed or revised agency publications, brochures and pamphlets meant for public consumption. The following notice is standard wording for publications, brochures, flyers, etc.:

"TURN Community Services, Inc. is committed to compliance with Title VI of the Civil Rights Act of 1964 and all related regulations and relevant guidance. TURN Community Services, Inc. or UDOT assures 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 financial assistance.

To request additional information on TURN Community Services' Title VI policy, or to file a discrimination complaint, please contact TURN Community Services, Inc. in Cedar City, at 435-586-1128, in St George, at 435-673-5251, in Provo, at 801-343-3900, in Salt Lake City, at 801-359-8876, or in Clinton, at 801-820-5471.

The Complaint Procedure is located at TURN Community Services, Inc., in Cedar City at 295 South 200 East, Cedar City, Utah 84720, in St George at 334 W Tabernacle Suite F, St George, Utah, 84770, in Provo at 1921 North 1120 West, Provo, Utah 84604, in Salt Lake City at 423 West 800 South Suite A200 Salt Lake City, Utah 84101, or in Clinton Utah (for Davis and Box Elder Counties) at 1906 West 1800 North, Clinton, Utah 84015."

TURN COMMUNITY SERVICES, INC.

Title VI Poster Requirements

TURN Community Services, Inc. will provide a poster (found in Appendix F) to meet the requirements listed below and will provide updates as required. TURN Community Services, Inc. will also keep a database of the location of all Title VI posters and ensure they are clearly posted in the appropriate public places. Posters will include the following information:

- Description of TURN Community Services, Inc. or UDOT Title VI commitment
- Information for more of TURN Community Services, Inc. or UDOT's Title VI program and the procedures to file a complaint, contact information, email, and address.
- For more information, visit www.turncommunityservices.org.
- FTA and UDOT Office of Civil Rights, Attention: Title VI Program Coordinators, address to file a complaint directly with either the state or federal agency.
- Additional information if another language is needed contact 435-585-1128. Ensure the sentence inserted on the poster is also provided in any language(s) spoken by LEP populations that meet the Safe Harbor Threshold.

TURN COMMUNITY SERVICES, INC.

Public Participation Plan

TURN Community Services, Inc. will work with UDOT staff to identify targeted minorities within the service area. UDOT RPT staff will supply demographic information to the lowest census level possible within the region to identify specifically what minority populations exist within the TURN Community Services, Inc. service area. TURN Community Services, Inc. will identify the appropriate locations to disseminate information to the identified populations (e.g., churches, grocery stores, senior citizen centers) to seek comment, interest in new service or service revisions and/or extensions. TURN Community Services, Inc. will document and maintain on file all activities related to Title VI outreach. This plan and documentation will be made available at UDOT's request.

TURN Community Services, Inc. will coordinate with the regional mobility manager to ensure that TURN Community Services, Inc. is included in regional planning efforts and that regional planning efforts include outreach to targeted populations within the TURN Community Services, Inc. service area.

TURN Community Services, Inc. will provide a summary to UDOT of all outreach efforts upon request or prior to future plan submittals and review.

TURN Community Services, Inc. recognizes that future funding for new or revised service requires documentation of the above efforts.

TURN COMMUNITY SERVICES, INC.

Limited English Proficiency

A. TURN Community Services, Inc. is committed to compliance with Title VI of the Civil Rights Act of 1964 and all related regulations and directives. By completing the Four Factor Analysis below, TURN Community Services, Inc. assures that no person shall on the grounds of race, color or national origin be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any FTA service, program, or activity.

1. **IRON COUNTY**-In the Iron County service area (7.7%) of the population is of Hispanic origin and (2.2%) of the population is of Native American origin. TURN Community Services, Inc. serves a very small number of individuals from these minorities. According to factfinder.census.gov, 1156 individuals, or 2.6 percent of the population, speak English less than “very well”.

Subject	Iron County, Utah					
	Total		Percent of specified language speakers			
			Speak English "very well"		Speak English less than "very well"	
	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
Population 5 years and over	43,803	+/-85	97.4%	+/-0.5	2.6%	+/-0.5
Speak only English	92.8%	+/-470	(X)	(X)	(X)	(X)
Speak a language other than English	7.2%	+/-470	63.6%	+/-6.8	36.4%	+/-6.8
Spanish or Spanish Creole	5.5%	+/-418	62.1%	+/-8.4	37.9%	+/-8.4
Other Indo-European languages	1.0%	+/-137	68.8%	+/-17.8	31.2%	+/-17.8
Asian and Pacific Island languages	0.5%	+/-107	68.9%	+/-21.4	31.1%	+/-21.4
Other languages	0.2%	+/-79	63.2%	+/-31.6	36.8%	+/-31.6

“An '(X)' means that the estimate is not applicable or not available.

WASHINGTON COUNTY- In the Washington County service area (9.8%) of the population is of Hispanic origin and (1.4%) of the population is of Native American origin and eligible to be served or likely to be encountered by the program. TURN Community Services, Inc. serves a very small number of individuals from these minorities. According to factfinder.census.gov, 3618 individuals, or 3.0 percent of the population, speak English less than “very well”.

Subject	Washington County, Utah					
	Total		Percent of specified language speakers			
			Speak English "very well"		Speak English less than "very well"	
	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error

Population 5 years and over	140,605	+/-69	97.0%	+/-0.4	3.0%	+/-0.4
Speak only English	90.8%	+/-0.6	(X)	(X)	(X)	(X)
Speak a language other than English	9.2%	+/-0.6	67.2%	+/-3.4	32.8%	+/-3.4
Spanish or Spanish Creole	7%	+/-0.6	63.3%	+/-4.2	36.7%	+/-4.2
Other Indo-European languages	1.1%	+/-0.2	84.5%	+/-8.5	15.5%	+/-8.5
Asian and Pacific Island languages	0.9%	+/-0.2	72.2%	+/-10.3	27.8%	+/-10.3
Other languages	0.2%	+/-0.1	86.0%	+/-14.4	14.0%	+/-14.4

- a. TURN Community Services, Inc. has employees in the Iron and Washington County area who speak the Spanish language, which is the largest concentration of minorities, so LEP persons are not considered underserved by transportation service due to language barriers.

UTAH COUNTY- In the Utah County service area (11.5%) of the population is of Hispanic origin. TURN Community Services, Inc. serves a very small number of individuals from this minority. According to factfinder.census.gov, 13,730 individuals or 4.2 percent of the population speak English less than “very well”.

Subject	Utah County, Utah					
	Total		Percent of specified language speakers			
			Speak English "very well"		Speak English less than "very well"	
	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
Population 5 years and over	328,190	N/A	88.5%	+/- .11	11.5%	+/- .11
Speak only English	88.5%	+/- .10	(X)	(X)	(X)	(X)
Speak a language other than English	11.5%	+/- .10	95.8%	+/- 0.06	4.2%	+/- 0.06
Spanish or Spanish Creole	7.5%	+/- .09	96.8%	+/- 0.06	3.2%	+/- 0.06
Other Indo-European languages	2.3%	+/- .05	N	N	N	N
Asian and Pacific Island languages	1.5%	+/- .04	N	N	N	N
Other languages	N	N	N	N	N	N

“N” Indicates sample size too small to estimate.

SALT LAKE COUNTY- In the Salt Lake County service area (18.1%) of the population is of Hispanic origin and (4.2%) of the population is of Asian origin and eligible to be served or likely to be encountered by the program. TURN Community Services, Inc. serves a very small number of individuals from these minorities. According to factfinder.census.gov, 60,190 individuals or 7.4 percent of the population speak English less than “very well”.

Subject	Salt Lake County, Utah					
	Total		Percent of specified language speakers			
			Speak English "very well"		Speak English less than "very well"	
	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
Population 5 years and over	818,213	N/A	83.8%	+/- .08	16.5%	+/- .08
Speak only English	83.8%	+/- .08	(X)	(X)	(X)	(X)
Speak a language other than English	16.2%	+/- .08	92.6%	+/- .05	7.4%	+/- .05
Spanish or Spanish Creole	9.2%	+/- .06	95.3%	+/- .04	4.7%	+/- .04
Other Indo-European languages	3.4%	+/- .04	98.9%	+/- .02	1.1%	+/- .02
Asian and Pacific Island languages	2.9%	+/- .04	98.6	+/- .03	1.4%	+/- .03
Other languages	N	N	N	N	N	N

"N" Indicates sample size too small to estimate.

DAVIS COUNTY- In the Davis County service area (9.4%) of the population is of Hispanic origin and (2.0%) of the population is of Asian origin and eligible to be served or likely to be encountered by the program. TURN Community Services, Inc. serves a very small number of individuals from these minorities. According to factfinder.census.gov, only 5,017 individuals or 2.3 percent of the population speak English less than "very well".

Subject	Davis County, Utah					
	Total		Percent of specified language speakers			
			Speak English "very well"		Speak English less than "very well"	
	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
Population 5 years and over	215,480	N/A	97.7%	+/- 0.06	2.3%	+/- 0.06
Speak only English	92.4%	+/- .10	(X)	(X)	(X)	(X)
Speak a language other than English	7.6%	+/- .10	97.7%	+/- 0.06	2.3%	+/- 0.06
Spanish or Spanish Creole	4.0%	+/- .08	98.6%	+/- 0.04	1.4%	+/- 0.04
Other Indo-European languages	1.9%	+/- .05	N	N	N	N
Asian and Pacific Island languages	1.4%	+/- .04	N	N	N	N
Other languages	N	N	N	N	N	N

"N" indicates sample size too small to estimate.

BOX ELDER COUNTY- In the Box Elder County service area (9.2%) of the population is of Hispanic origin and (1.1%) of the population is of Native American origin and eligible to be served or likely to be encountered by the program. TURN Community Services, Inc. serves a very small number of individuals from these minorities. According to factfinder.census.gov, only 943 individuals or 2.4 percent of the population speak English less than “very well”.

Subject	Box Elder County, Utah					
	Total		Percent of specified language speakers			
			Speak English "very well"		Speak English less than "very well"	
	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
Population 5 years and over	38,794	N/A	91.7%	+/- .3	8.3%	+/- .3
Speak only English	91.7%	+/- 0.3	(X)	(X)	(X)	(X)
Speak a language other than English	8.3%	+/- 0.3	2.4%	+/- .15	97.6%	+/- .15
Spanish or Spanish Creole	5.6%	+/- 0.2	98.3%	+/- .12	1.7%	+/- .12
Other Indo-European languages	1.8%	+/- 0.1	N	N	N	N
Asian and Pacific Island languages	0.7%	+/- 0.1	N	N	N	N
Other languages	N	N	N	N	N	N

“N” Indicates sample size too small to estimate

2. TURN provides transportation to few minority members. LEP persons may come into contact with the program through the following methods:
 - a. There will be special language assistance provided upon request at public meetings for those LEP persons needing translation.
 - b. When surveys are conducted by TURN Community Services, Inc., with clients/guardians, either in person or by mail, they will be made available in both English and Spanish languages.
3. TURN Community Services, Inc. coordinates with the Five County Association of Governments as a participating member of the Five County Regional Mobility Council. TURN Community Services, Inc. of Iron and Washington Counties provides support services, including transportation for people with disabilities. TURN Community Services also participates in the Local Coordinating Council in Utah County under the Mountainland Association of Governments for the Wasatch Front. In all of these areas, we provide transportation for Residential Supported Living and Group Homes, Supported Employment for groups and individuals, Day Treatment and Recreation programs, Family Support and Respite services.

- a. The largest concentration of LEP individuals in the Iron/Washington County and along the Wasatch Front service area is Spanish. TURN Community Services, Inc. provides scheduled transportation for individuals served by our local programs and LEP individuals would be encountered in the course of an individual choosing TURN to provide support services for them.
 4. Resources available to TURN Community Services, Inc. for LEP outreach, as well as the costs associated with that outreach are as follows:
 - a. Local newspapers – half page ads cost approximately \$80.00.
 - b. Local churches – no cost to place flyers.
 - c. Community Centers (i.e., Aquatic Center, Senior Citizen Center) – no cost to place flyers.
 - d. “I Speak” cards with 38 different languages – these are available online and are free.
 - e. Translator directory provided by UDOT – this is free.
 - f. Sign language alphabet sheet – this is available online and is free.
- B. Following completion of the Four Factor Analysis, TURN Community Services, Inc. assures that based on the results of the Analysis, a Language Assistance Plan has been created. The TURN Community Services, Inc. Language Assistance Plan includes the following:
1. Results of the Four Factor Analysis, including a description of the LEP Population(s) served.
 2. TURN Community Services, Inc. will provide language assistance services by utilizing the “I speak cards” in all vehicles and at public meetings.
 - a. Vital written documents which include Title VI Complaint Form, Notice to Beneficiaries, and other documents that provides access to services will be posted in both English and Spanish.
 3. TURN Community Services, Inc. will monitor, evaluate, and update the language assistance plan when new data is available from the U.S. Census or when it is clear that higher concentrations of LEP individuals are present in the Iron/Washington County area.
 4. TURN Community Services, Inc. will provide training to employees as follows:
 - a. Information on the Title VI complaint procedures and LEP Plan.
 - b. Documentation of interpretive services requests, including how to use the “I speak cards.”
 - c. How to handle a potential Title VI/LEP complaint.

TURN COMMUNITY SERVICES, INC.

Staff Ongoing Title VI Training Process/Description

TURN Community Services, Inc. staff and volunteers in Iron/Washington counties will be trained either annually or as newly hired staff/volunteers on Title VI. Training will include the following documents:

- Non-discrimination poster
- Title VI complaint form
- Complaint log
- LEP (Four Factor Analysis and Language Assistance Plan)
- Title VI brochure

TURN Community Services, Inc. will utilize UDOT staff to assist with trainings. Affidavits will be signed when training is completed and filed as part of the Title VI program documentation.

TURN COMMUNITY SERVICES. INC.

Transportation

TURN Community Services, Inc. is funded by a Federal Medicaid Waiver through the Utah Department of Services for People with Disabilities (DSPD) and is contracted with, and programs are licensed/certified by the Utah Department of Human Services. TURN Community Services, Inc. is compliant with all State/Federal all Rules, Regulations, Policies and Procedures covering the providing of transportation and the licensing, insuring, and maintaining the vehicles used for transportation provided under that contract. Transportation is provided on an as needed basis with some regularly scheduled service for daily and employment programs.

TURN COMMUNITY SERVICES. INC.

APPENDIX A

Table Depicting Minority Representation on Committees and Councils Selected by the Recipient

In general, TURN's executive oversight groups are fairly representative of the people we support, in that of the 840 individuals served by TURN throughout Utah, only 3-4% represent minority populations.

Administrative Body	White	Non-White
TURN Board of Directors	93%	7% Native American
TURN Executive Management Team	86%	14% Asian

TURN COMMUNITY SERVICES. INC.

APPENDIX B

UDOT Title VI Complaint Procedure and Investigation Guidelines

A. SCOPE OF TITLE VI COMPLAINTS

Any person who believes they have been aggrieved by an unlawful discriminatory practice under Title VI may individually or through a legally authorized representative make and sign a complaint and file the complaint with the UDOT Title VI Compliance Specialist. Allegations received do not have to use the key words “complaint,” “civil rights,” “discrimination,” or even their near equivalents. It is sufficient if such allegations imply any form of unequal treatment in one or more of our programs for it to be considered and processed as an allegation of a discriminatory practice.

B. UDOT TITLE VI PUBLIC NOTICE PROCESS

The Utah Department of Transportation has given assurance for the protection of the general public in accordance with Title VI. The UDOT, by a public notice process, affords the general public an opportunity to formally complain to the Department with regard to the Department’s treatment of Agency activities as they may adversely affect some. Public notices relating to UDOT Title VI Complaint Procedures shall be published annually in newspapers having a general circulation in the vicinity of proposed projects. As a minimum, such public notice shall contain the following:

1. UDOT assurance of compliance with Title VI of the Civil Rights Act of 1964 and Departmental Policy concerning non-discrimination in all UDOT activities.
2. Public right to file complaints.
3. One hundred eighty (180) calendar daytime limit for filing of complaints.
4. Complaint filing procedure.

C. UDOT TITLE VI FORMAL COMPLAINT PROCEDURE

AUTHORITY

49 CFR 21.11 (b), U.S. DOT'S Title VI Regulations

“Any person who believes himself/herself or any specific class of persons to be subjected to discrimination prohibited by this part may by himself or by a representative file with the Secretary a written complaint. A complaint must be filed no later than 180 calendar days after the date of the alleged discrimination, unless the time for filing is extended by the Secretary.”

This section outlines the Title VI complaint procedures, which will be followed in processing and conducting the investigation of complaints alleging discrimination under Title VI of the Civil Rights Act of 1964. These procedures define the responsibilities of the Title VI Coordinator with respect to investigation and resolution of complaints.

1. Any person who believes they have been aggrieved by an unlawful discriminatory practice under Title VI may individually or through a legally authorized representative make and sign a complaint and file the complaint with the UDOT Title VI Coordinator. Allegations received do not have to use the key words “complaint,” “civil rights,” “discrimination,” or even their near equivalents. It is sufficient if such allegations imply any form of unequal treatment in one or more of our programs for it to be considered and processed as an allegation of a discriminatory practice.
2. Within ten (10) calendar days, the Title VI Coordinator will acknowledge receipt of the allegation. A notification letter will be sent to the complainant of the action taken or proposed action to process the allegation and advise the complainant of other avenues of appeal available to them if they do not agree with the decision.

The notification letter will contain:

- a. The basis for the complaint.
- b. A brief statement of the allegations over which UDOT has jurisdiction.
- c. A brief statement of UDOT's jurisdiction over the recipient to investigate the complaint; and
- d. An indication of when the parties will be contacted.

Depending upon the nature of the complaint, the complainant may go to the following:

- a. U.S. Department of Justice (USDOJ)
- b. The filing of complaints with FHWA, FTA or FAA must be within the appropriate jurisdictional time frame. Each agency must be contacted by the complainant for the specific appeal procedure to be followed.

3. The Title VI Coordinator will review and determine the appropriate action regarding every complaint. UDOT will not proceed with or continue a complaint investigation if:
 - a. The complaint is, on its face, without merit.
 - b. If, the same allegations and issues of the complaint have been addressed in a recently closed investigation or by previous Federal court decisions.
 - c. The complaint allegation is moot and there are no class allegations; or
 - d. The complainant's or injured party's refusal to cooperate (including refusal to give permission to disclose his or her identity) has made it impossible to investigate further.

4. The Title VI Coordinator will also notify the appropriate DOT modal agency, i.e. FHWA, FAA, or FTA Regional Office of Civil Rights within ten (10) calendar days of receipt of the allegations.
 - a. Name, address, and phone number of the Complainant.
 - b. Name(s) and address(s) of persons alleged to have been involved in the act.
 - c. Basis of alleged discrimination (i.e., race, color, sex, national origin, disability, or age). Federal Transit Title VI discrimination complaints cover race, color or national origin. Physical or mental disability is added due to the Rehabilitation Act of 1973 and the Americans with Disability Act of 1990.
 - d. Date of alleged discriminatory act(s).
 - e. Date complaint was received by the UDOT.
 - f. A brief statement of the complaint.
 - g. Other agencies (state, local or federal with which the complaint has been filed).
 - h. An explanation of the actions the Department has taken or proposed to resolve the issues raised in the complaint.

5. Within sixty (60) calendar days, the Title VI Coordinator and appropriate Program Designee will conduct and complete an investigation of the allegation, and based upon the information obtained, will render their recommendation for action in a report of finding to the Director of the UDOT. The report will be completed with the coordination and consultation of the Department's General Counsel.

6. The Utah Department of Transportation will establish procedures for promptly resolving deficiency status and reducing to writing the remedial action considered necessary. All within a period not to exceed sixty (60) calendar days.

7. A copy of the complaint together with a copy of the UDOT's report of the investigation shall be forwarded to Federal Transit, Regional Civil Rights Officer within (60) calendar days of the date the complaint was received by UDOT.

D. UDOT TITLE VI INFORMAL COMPLAINT POLICY

1. Title VI complaints may be resolved by informal means. When informal means are utilized, the complainant must be informed of their right to file a formal written complaint. Such informal attempts and their results will be summarized by the Title VI Designee and forwarded to the Title VI Coordinator.
2. Any complaint received in writing shall be considered to be a formal complaint and shall be handled under the formal complaint procedure outlined above.
3. The Title VI Coordinator will periodically inform the Federal Transit, Regional Civil Rights Officer regarding the status of complaints.
4. When a complaint has been directly filed with another state or Federal agency, the Title VI Coordinator is to be informed by the Agency where the complaint has been filed and coordinate any action needed by the UDOT to resolve the complaint.

TURN COMMUNITY SERVICES. INC.

APPENDIX C

Title VI Complaint Forms

TURN Community Services, Inc

Director of Operations
44 W. Harding Ave. #101
Cedar City, UT 84720
(435) 586-1128
Fax (435) 586-7869

TURN Community Services

Director of Operations
1921 North 1120 West
Provo, UT 84604
(801) 343-3900
Fax (801) 343-3925

TURN Community Services, Inc

Director of Operations
523 E. Sunland Dr. #5A
St George, UT 84770
(435) 673-5251
Fax (435) 673-5265

TURN Community Services

Director of Operations
PO Box 1287
Salt Lake City, UT 84110-1287
(801) 359-8876
Fax (801) 359-2915

Utah Department of Transportation

Civil Rights Division
PO Box 141520
Salt Lake City, UT 84114-1520
(801) 965-4384
Fax (801) 965-4101

Name(s)	Agency	Work Location (if known)	Classification (if known)

What Remedy? Requested Action? And/or Adjustment you are requesting? Please be specific. Use additional sheets as necessary.

Your Signature _____ Date _____

TURN Community Services, Inc
 Director of Operations
 44 W. Harding Ave. #101
 Cedar City, UT 84720
 (435) 586-1128
 Fax (435) 586-7869

TURN Community Services
 Director of Operations
 1921 North 1120 West
 Provo, UT 84604
 (801) 343-3900
 Fax (801) 343-3925

TURN Community Services, Inc
 Director of Operations
 523 E. Sunland Dr. #5A
 St George, UT 84770
 (435) 673-5251
 Fax (435) 673-5265

TURN Community Services
 Director of Operations
 PO Box 1287
 Salt Lake City, UT 84110-1287
 (801) 359-8876
 Fax (801) 359-2915

UDOT Title VI Specialist
 PO Box 141265
 Salt Lake City, UT 84114-1265
 Email: civilrights@utah.gov
 Phone: (801) 965-4384
Fax (801) 965-4101

FORMULARIO DE QUEJAS TITULO VI

Quejas deben ser sometidas por escrito y presentadas al Coordinador de Titulo VI durante los 180 días a partir de la fecha en que ocurrió la presunta discriminación. El demandante tiene derecho a representación. Someta su queja por escrito a FTA, Oficial de Derechos Civiles de la Region. El demandante tiene la opción a permanecer anónimo o solicitador ayuda llenando el formulario de quejas.

Nombre _____ Fecha _____

Dirección _____

Tel Empleo _____ Tel Hogar _____ Tel Cel _____

FTA reconoce raza, color, y origen nacional como bases para quejas al Titulo VI. Indique el motivo por el cual cree haber sido discriminado(a) marcando una de las siguientes opciones:

Raza

Color

Origen Nacional

Explique porqué cree que ha sufrido discriminación. Por favor provea fecha(s), hora(s), y lugar(es). Por favor provea nombres de testigo(s), direccion(es), y número(s) de teléfono. Por favor provea nombre(s) y lugar(es) de empleo de la(s) persona(s) quienes usted cree son responsables de la discriminación. Explique la resolución que está pidiendo. (Use mas hojas si es necesario)

Indique que persona(s) son presuntamente responsables

Nombre(s)	Agencia	Lugar de empleo (si disponible)	Clasificación (si disponible)

¿Qué remedio, acción, o ajuste está solicitando? Por favor sea específico(a). Use mas hojas si es necesario.

Firma _____ Fecha _____

TURN COMMUNITY SERVICES. INC.

APPENDIX E

Notice to the Public

- TURN Community Services, Inc. operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the TURN Community Services, Inc. Civil Rights Department, or appropriate individual.
- For more information on the TURN Community Services, Inc. Civil Rights Program and the procedures to file a complaint, see www.turndreams.org or; TURN Community Services, Inc. office at: 295 South 200 East, Cedar City, Utah or call (435) 586-1128, or, TURN Community Services, Inc. office at: 334 W Tabernacle, Ste. F, St George, Utah or call (435) 673-5251.
- Complaints must be filed in person or in writing. Complaints should be directed to:

TURN Community Services, Inc.

Director of Operations

Attn: Title VI Officer

PO Box 1287

Salt Lake City, Utah 84110-1287

- Complaints may be filed directly with the Utah Department of Transportation: Utah Department of Transportation
Attn: UDOT Title VI Specialist
P.O. Box 141265
Salt Lake City, UT 84114-1265
Email: civilrights@utah.gov
Phone: 801-965-4384
Fax: 801-965-4101
- A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint at:
Federal Transit Administration, Office of Civil Rights
Attn: Title VI Program Coordinator
East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE
Washington, DC 20590

For information in another language, contact the UDOT reception desk at 801-965-4000 or go to UDOT's Translators website at www.udot.utah.gov/go/titleVI

TURN COMMUNITY SERVICES. INC.
and
Utah Department of Transportation

APPENDIX F

Title VI Poster



NON-DISCRIMINATION TITLE VI POSTER

Title VI and Nondiscrimination Commitment (FHWA):

Pursuant to Title VI of the Civil Rights Act of 1964 and related laws and regulations, TURN Community Services, Inc. (TURN) and UDOT will not exclude from participation in, deny the benefits of, or subject to discrimination anyone on the grounds of race, color, national origin, sex, age or disability.

Title VI and Nondiscrimination Commitment (FTA):

Pursuant to Title VI of the Civil Rights Act of 1964 and related laws and regulations, TURN and UDOT will not exclude from participation in, deny the benefits of, or subject to discrimination anyone on the grounds of race, color, and national origin.

Complaint Procedures:

TURN has established a discrimination complaint procedure and will take prompt and reasonable action to investigate and eliminate discrimination when found. Any person who believes that he or she has been aggrieved by an unlawful discriminatory practice under Title VI has a right to file a formal complaint with TURN or UDOT. Any such complaint must be in writing and filed with the TURN or UDOT Title VI

Specialist within one hundred eighty (180) days following the date of the alleged discriminatory occurrence. For more information, please contact the TURN's or UDOT's Title VI Coordinator.

ADA/504 Statement:

Pursuant to Section 504 of the Rehabilitation Act of 1973 (Section 504), the Americans with Disabilities Act of 1990 (ADA) and related federal and state laws and regulations, TURN and UDOT will make every effort to ensure that its facilities, programs, services, and activities are accessible to those with disabilities. TURN and UDOT will provide reasonable accommodation to disabled individuals who wish to participate in public involvement events or who require special assistance to access CATS facilities, programs, services, or activities. Because providing reasonable accommodation may require outside assistance, organization, or resources, TURN and UDOT asks that requests be made at least five (5) calendar days prior to the need for accommodation. Questions, concerns, comments, or requests for accommodation should be made to TURN's or UDOT's ADA Coordinator.

Services are provided free without charge for individuals with special needs with disabilities. Any fees will be paid by the recipient or subrecipient. The public will have access to translators, TTY/TDD services and vital documents translated when requested.

TURN Title VI Coordinator/ADA Coordinator

Eliza Detherage
Director of Operations
TURN Community Services
P.O. Box 1287
Salt Lake City, UT 84110-1287
Email: elizadetherage@turndreams.org
Phone: (801) 359-8876
Fax: (435) 586-8978

Brenda Harris
Human Resources Director
TURN Community Services
P.O. Box 1287
Salt Lake City, UT 84110-1287
Email: brendaharris@turndreams.org
Phone: (801) 359-8876
Fax: (801) 359-2915

UDOT Title VI Specialist

Utah Department of Transportation
Civil Rights Division
4501 South 2700 West
P.O. Box 141520
Salt Lake City, UT 84114-1265
Email: civilrights@utah.gov
Phone: (801) 965-4384
Fax: (801) 965-4101

UDOT ADA Coordinator

Chris Mabey
Utah Department of Transportation
Traffic and Safety Division
4501 South 2700 West
P.O. Box 143200
Salt Lake City, UT 84114-3200
Email: cmabey@utah.gov
Phone: (801) 965-4272
Hearing Impaired: 711 or 1-800-346-4128



CARTEL TITULO VI NO-DISCRIMINACION

Título VI y Compromiso a no discriminación (FHWA):

Según el Título VI de el Acto de Derechos Civiles de 1964 y leyes y reglamentos relacionados, Cedar Area Transportation Service (CATS) or UDOT no quedará libre de participación en, negará beneficios de, o sujetará a discriminación a nadie en base a raza, color, origen nacional, sexo, edad o discapacidad.

Título VI y Compromiso a no discriminación (FTA):

Según el Título VI de el Acto de Derechos Civiles de 1964 y leyes y reglamentos relacionados, TURN or UDOT no quedará libre de participación en, negará beneficios de, o sujetará a discriminación a nadie en base a raza, color, y origen nacional.

Proceso para Tramitar Quejas:

TURN ha establecido un proceso para tramitar quejas de discriminación y tomará acción pronta y razonablemente para investigar y eliminar discriminación cuando ésta suceda. Cualquier persona que crea que él o ella ha sido ofendido(a) por una práctica ilícita y discriminatoria bajo el Título VI tiene derecho a someter una queja formal con UDOT. Tal queja debe ser por escrito y sometida al Coordinador de Título VI de UDOT durante los ciento ochenta (180) días a partir de la fecha del presunto acontecimiento. Para más información, por favor comuníquese con el Coordinador de Título VI de UDOT.

Declaración ADA/504:

Según la Sección 504 de al Acto de Rehabilitación de 1973 (Sección 504), El Acto de Ley para Estadounidenses con Discapacidades de 1990 (ADA) y leyes y reglamentos estatales y federales relacionados, TURN hará todo esfuerzo para asegurar que sus instalaciones, programas, servicios, y actividades sean accesibles a todos aquellos con discapacidades. TURN or UDOT hará modificaciones razonables para individuos con discapacidades quienes deseen participar en eventos públicos o a quienes requieren asistencia especial para accede programas, servicios o actividades. Ya que porveer tales modificaciones puede requerir asistencia de terceras personas, organización o recursos, UDOT pide que

cualquier petición sea hecha al menos cinco (5) días antes de la fecha en que se necesita tal modificación. Preguntas o solicitudes deben ser dirigidas al Coordinador de ADA de UDOT.

Los servicios serán proveídos libres de cargo a individuos con necesidades especiales o discapacidades. Cualquier cargo será pagado por el beneficiario. El public tendrá acceso a traductores, tarjetas “Yo Hablo”, servicios TTY/TDD y documentos esenciales traducidos cuando sea necesario.

CATS Titulo VI Coordinador/ADA Coordinadors

Eliza Detherage
Director of Operations
TURN Community Services
P.O. Box 1287
Salt Lake City, UT 84110-1287
Email: elizadetherage@turndreams.org
Phone: (801) 359-8876
Fax: (435) 586-8978

Brenda Harris
Human Resources Director
TURN Community Services
P.O. Box 1287
Salt Lake City, UT 84110-1287
Email: brendaharris@turndreams.org
Phone: (801) 359-8876
Fax: (801) 359-2915

UDOT Title VI Specialist

Utah Department of Transportation
Civil Rights Division
4501 South 2700 West
P.O. Box 141520
Salt Lake City, UT 84114-520
Email: civilrights@utah.gov
Tel: (801) 965-4384
Fax: (801) 965-4101

UDOT ADA Coordinator

Chris Mabey
Utah Department of Transportation
Traffic and Safety Division
4501 South 2700 West, P.O. Box 143200
Salt Lake City, UT 84114-3200
Email: cmabey@utah.gov
Phone: (801) 965-4272
Hearing Impaired: 711 or 1-800-346-4128