

Guernsey County Senior Citizens Center, Inc.

1022 Carlisle Avenue • Cambridge, Ohio 43725

Telephone: 740-439-6681 • Fax: 740-439-7478

E-mail: gcscc@guernseysenior.org

Website: www.guernseysenior.org

"Serving Senior Citizens Throughout Guernsey County"

Notifying the Public of Rights Under Title VI Guernsey County Senior Citizens Center, Inc.

Guernsey County Senior Citizens Center, 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 **Guernsey County Senior Citizens Center, Inc. ATTN: Affirmative Action Officer, 1022 Carlisle Avenue, Cambridge, OH 43725.**

For more information on the Guernsey County Senior Citizens Center, Inc. civil rights program, and the procedures to file a complaint, contact Shon Gress, Executive Director at **(740)439-6681, Toll-Free: 1-866-534-2349, Fax: (740) 439-7478; (TTY 740-439-6681);** email: sgress@guernseysenior.org or visit our administrative office at **1022 Carlisle Avenue, Cambridge, OH 43725.** For more information, visit www.guernseysenior.org.

A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington DC 20590.

If information is needed in another language, please contact us toll-free at 1-866-534-2349.



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Title VI Complaint Procedure

Any person who believes she or he has been discriminated against on the basis of race, color, sex, age, income, or national origin by the Guernsey County Senior Citizens Center, Inc.-Transportation Department (GCSCC) may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form.

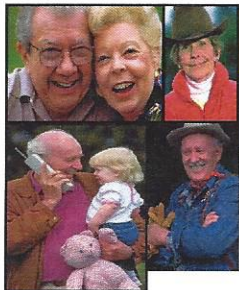
The Guernsey County Senior Citizens Center, Inc. investigates complaints received no more than 180 days after the alleged incident. GCSCC will process complaints that are complete.

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

GCSCC has 7 business days to investigate the complaint. If more information is needed to resolve the case, GCSCC may contact the complainant. The complainant has 7 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 14 business days, GCSCC can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

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 Title VI 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. If the complainant wishes to appeal the decision, she/he has 30 days after the date of the letter or the LOF to do so.

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.



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TITLE VI-COMPLAINT FORM

Section I:

Name:

Address:

Telephone (Home):

Telephone (Work):

Electronic Mail Address:

Accessible Format
Requirements?

Large Print

TDD

Audio Tape

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:

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

☐ Sex

☐ Age

☐ Disability

☐ Low Income

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 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?		
<input type="checkbox"/> Yes <input type="checkbox"/> No If yes, check all that apply: <input type="checkbox"/> Federal Agency: _____ <input type="checkbox"/> Federal Court _____ <input type="checkbox"/> State Agency _____ <input type="checkbox"/> State Court _____ <input type="checkbox"/> 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 materials 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:
 Guernsey County Senior Citizens Center, Inc.
 Attn: Executive Director
 1022 Carlisle Avenue
 Cambridge, Ohio 43725



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TITLE VI-ALLEGE DISCRIMINATION, COMPLAINT, INVESTIGATION & LAWSUIT LOG

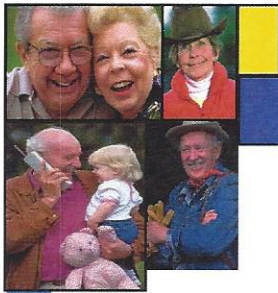
GCSCC shall prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, sex, age, income, or national origin:

- ☐ Active investigations conducted by FTA and entities other than FTA;
- ☐ Lawsuits; and
- ☐ Complaints naming the Transit System and/or Rural Grantee.

This list shall include the date that the transit-related Title VI 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 in response, or final findings related to the investigation, lawsuit, or complaint. This list shall be included in the Title VI Program submitted to ODOT every grant year.

List of Investigations, Lawsuits and Complaints

	Date (Month- Day-Year)	Summary (include basis of complaint: race, color sex, age, income, or national origin)	Status	Action(s) Taken
Investigations				
1.				
2.				
Complaints				
1.				
2.				
Lawsuits				
1.				
2.				



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TITLE VI—PUBLIC POPULATION & BOARD OF DIRECTORS MATRIX

Body	Caucasian	Latino	African American	Asian American	Native American
Population	95.5%	<.5%	3.0%	<.6%	<.5%
GCSCC-Board of Directors	99.0%	0%	0%	0%	<.5%



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GCSCC-Title VI Community Outreach & Limited English Proficiency Plan

GCSCC operates in accordance and in compliance with applicable Ohio Department of Aging regulations that specify our organization ensures that minority, low-income, and limited English proficient populations have meaningful access to a variety of marketing tools and provides/promotes public outreach and involvement, which includes:

GCSCC continually working to recruit and attract new clients, especially new low-income minority and rural older adults who are interested in utilizing our transportation services. Seniors living in the far out lying, isolated areas of Guernsey County are specifically sought through our marketing efforts as well as through other innovative PR, marketing, and public advertising measures.

Through collaboration with the Senior Supplemental Food Commodities Program the GCSCC has been selected to distribute monthly food packages to seniors aged 60 and older who also meet federal poverty guideline eligibility of 150% or below FPG levels. This has enabled us to provide community outreach to over 460 low-income seniors living throughout Guernsey County, including far outlying areas. Through the Senior Supplemental Food Program we hope to continue to educate and inform potential seniors about our transportation services and other senior based programs.

In addition, because this is a countywide program it is our goal to increase transportation services to more low-income minorities and rurally isolated seniors by continuing our desire to address the culturally diverse needs and expectations of older adults through similar community outreach efforts while also efficiently operating this program to stay within our financial and budgetary confines.

Through community outreach efforts which include, but are not limited to; strategically displaying program flyers and posters in public facilities; speeches; distribution of our monthly newsletter; brochures; newspaper articles; featured articles; television and radio advertisements; displays; presentations; and other forms of advertisement and active community involvement in a variety of community sponsored activities GCSCC will continue to promote and advocate to seniors regarding the benefits of senior transportation services and share our abilities to meet seniors' daily transportation needs.

AN EQUAL OPPORTUNITY EMPLOYER

*"Funded in Part by The Ohio Department of Aging through The Area Agency on Aging, Region 9",
Senior Services Tax Levy, Guernsey County Department of Job & Family Services, United
Way of Guernsey County, and Donations received from our County-wide Supporters.*

GCSCC will continue to work with and accept referrals that are provided by:

- ☐ Personal/ Self/Family/Relative/or Public Referrals
- ☐ Area Agency on Aging, Region 9
- ☐ Southeastern Regional Medical Center and other medical providers
- ☐ Guernsey County Department of Job and Family Services
- ☐ Salvation Army
- ☐ Other civic and community organizations
- ☐ Churches / Synagogues
- ☐ Family friend – paraprofessional or relative
- ☐ Caregiver
- ☐ Interdepartmental
- ☐ Senior living facilities (apartments & senior housing authorities)
- ☐ Other...

Through community outreach efforts which includes speeches, monthly newsletter, brochures, newspaper articles, television advertisement and other forms of advertisement and community activities the GCSCC will continue to actively attract and acquire clients by continuing to promote and advocate the many pros & positives of participating in our transport services.

Information regarding Senior Transportation Services is largely publicized among our many promotional materials, including articles in: Seniors Alive!, Alive & Kicking, Now & Then, The Advertiser, The Gazette, radio promotion of our menus on WILE/WCMJ, inclusion of our weekly menus posted in The Daily Jeffersonian and via other various media venues. But, our largest support comes by way of “word of mouth” among seniors. By continually making improvements that enhance the overall quality, safety, and satisfaction of our well maintained vehicles, more and more senior citizens continue to prefer GCSCC’s transportation services over other local transport providers.

Brochures with Transportation services listed are given to all new members who join the Center. They are placed at Health Fairs and at any activity and/or trade fair at which the Senior Center actively attends or participates.

GCSCC publicizes in monthly news articles in The Jeffersonian, “Seniors Alive”, Alive & Kicking, The Advertiser, The Gazette, Now & Then Magazine, Website, Cable Channel Two, and Newsletter, which also promotes our transportation services. GCSCC provides Information and Referral Services, which is consistently used to educate seniors and/or older adult caregivers about our viable and easily accessible transportation services.

Our vans are a great advertisement of their own. They have the Senior Center’s name and phone number on both sides of each vehicle as well as bumper stickers

acknowledging AAOA-9 & ODOT funding recognition. People are always commenting that they see our vans “all over town and driving throughout the county” delivering seniors to various different locations.

Seniors themselves are our best method to acquire new clients. They tell their friends how stress free and convenient our services are to utilize and how thankful they are for our van service, which encourages other eligible individuals to utilize this service.

We also receive referrals from other agencies. They are:

- Area Agency on Aging-Region 9
- Kidney Care Cambridge Dialysis Center
- Bethesda Dialysis Center,
- Cancer Center
- Social Workers from Cambridge and Zanesville Area Hospitals
- Golden Rule Work Shop/DD
- Nursing Homes
- Guernsey County Health Department
- Residential Senior Apartment Communities & Living Facilities
- SEAT
- Guernsey County Department of Job & Family Services just to name a few.
- All of whom we consider to be our staunchest and most loyal community partners by way of signed collaboration and community partnership agreements.

All services provided by GCSCC are described and advertised at our on-line website at www.guernseysenior.org.

Client Choices / Options include:

- ☐ Accommodation of individual clients' schedules and appointments.
- ☐ Availability of dispatch (CB) capabilities to change desired location/destination in transit if so desired or necessary.
- ☐ Availability of 24-hour messaging to make emergency and/or special transportation requests, including changes to a previously established itinerary.
- ☐ Availability and client opportunity to delay, cancel, change, refuse, alter, curtail, or make special requests regarding transportation services.
- ☐ Option to request preferred vehicle transport type and/or driver to ensure maximum comfort and customer satisfaction.

- ☐ Opportunity to utilize established outlying county routes, which provide increased transportation services to/from the next closest city or village within the county.
- ☐ Clients are provided the opportunity to make transportation reservations via a direct telephone line. Fax, e-mail, in person, mail, and no-cost toll-free telephone service for long distance areas from within the county are available when making reservations.
- ☐ Freedom and flexibility to make and cancel transportation appointments.
- ☐ Opportunity to specify preferred driver and/or request a specific driver when schedules permit or the requested driver is available.
- ☐ The ability for clients and/or GCSCC staff and associates to choose from a variety of vehicles to ensure that the make, model, design, access, seating, special equipment and other vehicle options maximizes each client's needs and/or comfort standards and requirements.
- ☐ Ability to utilize "after hours" transportation services that are provided by GCSCC for GCSCC sponsored special evening activities and events.

Client satisfaction and service quality remains a top priority for GCSCC. Client satisfaction assurance occurs through;

- ☐ GCSCC welcoming and encouraging client recommendations and suggestions, communication, feedback, compliments and complaints.
- ☐ Random periodic follow-up visits or telephone surveys or personal interviews and inquiries regarding client service & delivery satisfaction.
- ☐ Random periodic program surveys are distributed to clients and/ or caregivers.
- ☐ Discontinue exit interview / survey.
- ☐ Complete client surveys are also completed in each department on a quarterly/bi-annual basis or "as deemed needed by the Executive Director" in an effort to maintain high-quality Standards; gauge trends; levels of client satisfaction.

The following is a summarized list of Guernsey County Senior Citizens Center's policies & procedures pertaining to a client's "Rights and Responsibilities" in cases of dissatisfaction and/or due process.

- ☐ HIPAA & Confidentiality of Participant Records
- ☐ 408.0 Prioritization Process
- ☐ 409.1 Policy: Quality Improvement
- ☐ 410.0 Policy: Participant Suggestions and Complaints

- ☐ 410.2 Policy: Participant Claim Related To Theft or Damage in the Home
- ☐ 410.3 Participant Injury on Premises and Upon Receiving Care
- ☐ 613.1 Policy: Senior (60+) Discipline
- ☐ 615.2 Policy: Participant Grievance
- ☐ 615.3 Policy: Participant Appeal
- ☐ Client's Rights and Responsibilities under Title III of the Older American Acts—Line 13 "To voice grievances or suggest changes without fear of discrimination, restrain, or reprisal."
- ☐ GCSCC Social Membership Participant Code of Conduct

Guernsey County Senior Citizens Center, Inc. has been in operation for over 43 years and maintains extremely high and outstanding quality-satisfaction among our clients and consumers in all service and program categories.

GCSCC encourages, maintains, and promotes continual life-long learning, CEU, and professional training and development among all of our associates and employees in an effort to improve our overall professional skills, education, abilities, services, programs, customer satisfaction, and our already high quality standards.

Compliance Procedures—409.0 Policy: Quality Assurance

It shall be the policy of GCSCC to establish and maintain a system of insuring that all services provided by the Guernsey County Senior Citizens Center are all of high quality and met with Ohio Administrative Code Rules and all applicable compliance & conditions of participation standards.

Procedures:

- ☐ Services will be provided according to ODA, OAC, ODOT, & ORC professional service standards.
- ☐ All new participants will be given a copy of the Title III Worker's Code of Ethics, the Title III Participant's Rights & Responsibilities, HIPAA, and information for making complaints or suggestions.
- ☐ Participant records and worker files will be maintained according to professional service standards.
- ☐ Policies relating to services provided will continue to be developed, implemented, evaluated, and enhanced in order to ensure program quality, integrity, and enhancements.

- ☐ Policies relating to operational assurances (as defined by the AAA) will be developed, implemented and evaluated.
- ☐ Policies relating to personnel will be developed, implemented and evaluated.
- ☐ Policies relating to participants served will be developed, implemented and evaluated.
- ☐ Policies relating to an ongoing systematic plan of evaluation will be developed, implemented and evaluated.
- ☐ Goals and objectives will be developed each program year, as a method of measuring attainment of expected service levels, worker training and capability, participant satisfaction, record keeping, and evaluation of quality.
- ☐ GCSCC shall be monitored by AAOA-9 in order to maintain proper compliance with ODA service specifications, rules, regulations, and standards.
- ☐ GCSCC shall continue to adhere to ODA service specifications in accordance to the confines of any contracts we gladly enter into with Area Agency on Aging, Region 9.
- ☐ GCSCC shall continue to willingly undergo an independent annual financial audit and/or ODA monitored program audits as required.

GCSCC provides transportation services, especially to the following underserved populations: Minority Elderly, Frail Elderly, Low Income Elderly, Abused, Neglected, Exploited Elderly, Mental/ Developmentally Disabled Elderly. The Nutrition Department receives referrals from the local Hospital, the Guernsey County Health Department, Hospice, AAOA, and other Home Health Agencies as well as agencies outside of the immediate area. Individual seniors and the concerned families of seniors also call to request services. GCSCC intends to find and serve the following cohorts of older adults:

Low- Income Minority:

- ☐ Locate through multi-cultural & multi faceted referral system
- ☐ Market and solicit information in low-income minority communities, churches, businesses, nursing homes, senior housing facilities, hospitals, and individual households
- ☐ Locate and serve through referrals received by the Guernsey County Department of Job & Family Services, SEORMC, Salvation Army, AAA-9, social workers, caregivers, and all other agencies and individuals.

Limited English Speaking Persons (LEP):

- ☐ In accordance to the Civil Rights Act of 1964, it shall be the policy of the Guernsey County Senior Citizens Center to provide no cost- accurate and timely language assistance and effective communication to persons with limited English proficiency. These language services will be provided to current and prospective participants of our services and programs, and other interested persons to ensure them equal access to our services via AAA9's contracted interpreter services.
- ☐ Locate through multi-cultural & multi faceted referral system
- ☐ Market and solicit information in limited English speaking communities, churches, businesses, and individual households
- ☐ Locate and serve through referrals received by the Guernsey County Department of Job & Family Services, SEORMC, Salvation Army, AAA-9, social workers, caregivers, and all other agencies and individuals.

Rurally Isolated/Older Adults:

- ☐ Locate through multi-cultural & multi faceted referral system
- ☐ Market and solicit information within rurally isolated communities, nursing homes, senior living facilities, hospitals, churches, businesses, and individual households
- ☐ Locate and serve through referrals received by the Guernsey County Department of Job & Family Services, SEORMC, Salvation Army, AAA-9, social workers, caregivers, and all other agencies and individuals.

Institutionalized/Exiting Nursing Home-Return To Home Care:

- ☐ Locate through multi-cultural & multi faceted referral system
- ☐ Market and solicit information within rurally isolated communities, nursing homes, senior living facilities, hospitals, churches, businesses, and individual households
- ☐ Locate and serve through referrals received by the Guernsey County Department of Job & Family Services, SEORMC, Salvation Army, AAA-9, social workers, caregivers, and all other agencies and individuals.

DIRECTIVE:

To meet the intent of the Older Americans Act; Limited English Proficiency; Americans with Disabilities Act (ADA) by ensuring that all persons have appropriate access to brochures and GCSCC information and assistance.

PROCEDURE:

Brochures and other printed materials are available in alternative formats upon request. Alternative formats include, but are not limited to, large print, audio cassettes, and computer disks.

A statement that the information is available in alternative format will be included on all brochures and printed materials.

A TTY/TDD or the Ohio Relay number (1-800-750-0750) will be included in all printed or internet materials with phone numbers listed. TTY/TDD or the Ohio Relay number will be included in all radio and TV commercials (public service announcements).

Public hearings will be held in accessible locations.

Public hearing notices will include the statement that any person requiring special accommodations should contact the GCSCC Transportation Supervisor/Department Manager, Jane Smith at 555-555-5555.

405.1 Limited English Proficiency Policy

In accordance to the Civil Rights Act of 1964, it shall be the policy of the Guernsey County Senior Citizens Center to provide no cost accurate and timely language assistance and effective communication to persons with limited English proficiency. These language services will be provided to current and prospective participants of our services and programs, and other interested persons to ensure them equal access to our services.

PROCEDURE A

1. All current and potential participants of GCSCC services and/or programs shall be extended the opportunity to access verbal and written interpreter services at no cost.
2. Interpreter services shall be coordinated and arranged within such a timely manner that does not subject the person(s) to unreasonable delays in receiving service or participation in a program.
3. No current or potential participant of GCSCC services and/or programs shall be limited in scope or receive a lower quality of diminished services than those provided to other persons.
4. Participation in all services, programs, and activities provided by GCSCC shall not be limited based on an individual's English proficiency.
5. All Limited English Proficiency (LEP) persons shall be informed of their right to receive free interpreter services and/or requiring LEP persons to provide their own interpreter.

6. All persons will be extended every opportunity and advantage to overcome language barriers and participate meaningfully in all services, programs, and activities administered by GCSCC without discrimination.
7. Equal opportunity and discrimination policies are posted. Complaints of discrimination will be handled as outlined by current program policies and procedures.

PROCEDURE B:

In the event a person(s) require English Interpreter assistance or services the following procedure should be followed;

Origin of Language Identified or Unidentified- Oral Communication

A. Possible Contacts to notify and/or call

Southeastern Ohio Regional Medical Center (Shared contract with Telephone Interpreter Service)	740-439-8147
Area Agency on Aging-9	740-439-4478
Muskingum College	740-826-8211
St. Michael's Byzantine Catholic Church	740-685-3292
Ohio University Zanesville	740-432-4404

Origin of Language Identified or Unidentified- Written Communication

- B.** Once an appropriate interpreter has been ascertained from the above list, and a participant requires written assistance any pertinent documents; including applications, assessments, or general literature shall be faxed over to the interpreter for oral translation.

RESPONSIBILITIES:

Additional efforts include:

- Scheduling meetings at times and locations that are convenient and accessible for minority and LEP communities.
- Employing different meeting sizes and formats.
- Coordinating with community- and faith-based organizations, educational institutions, and other organizations to implement public engagement strategies that reach out specifically to members of affected minority and/or LEP communities.
- Utilize radio, television, or newspaper ads on stations and in publications that serve LEP populations. Outreach to LEP populations could also include audio programming available on podcasts.

- Provide opportunities for public participation through means other than written communication, such as personal interviews or use of audio or video recording devices to capture oral comments.
- GCSCC shall comply with the public participation requirements of 49 U.S.C. Sections 5307(b) (requires programs of projects to be developed with public participation) and 5307(c)(1)(I) (requires a locally developed process to consider public comment before raising a fare or carrying out a major reduction in transportation service).

The GCSCC Transportation Supervisor/Department Manager is responsible for assuring that public transportation services are provided as noted above.