## LANGUAGE ASSISTANCE PLAN (LAP)

## I. Introduction

This Language Assistance Plan (LAP), for Douglas County has been developed in response to federal requirements included under Section 601 of Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), which provides 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 subjected to discrimination under any program or activity receiving federal financial assistance."

Federal Executive Order No. 13166, issued in August 2000 by President Clinton, "Improving Access to Services for Persons with Limited English Proficiency," was created to "...improve access to federally conducted and federally assisted programs and activities for persons who, as a result of national origin, are limited in their English proficiency (LEP)..." President Bush affirmed his commitment to Executive Order 13166 through a memorandum issued on October 25, 2001, by Assistant Attorney General for Civil Rights, Ralph F. Boyd, Jr. and Acting Assistant Attorney General, Loretta King directed a strengthening of enforcement of Title VI in a memorandum dated July 10, 2009.

As a sub-recipient of federal funds, Douglas County has developed this LAP to ensure compliance with federal regulations. It includes an assessment of the LEP needs of our area, an explanation of the steps we are currently taking to address these needs, and the steps we plan to take in the future to ensure meaningful access to federally funded programs by persons with LEP.

## **II. Purpose and Authority**

The purpose of this plan is to establish effective guidelines, consistent with Title VI of the Civil Rights Act of 1964 and Executive Order 13166, for Douglas County Community and Resource Services personnel and its subgrantees to follow when providing services to, or interacting with, individuals who have Limited English Proficiency (LEP).

## III. Policy

It is Douglas County's policy to ensure that programs and activities, normally provided in English, are accessible to LEP persons and thus do not discriminate on the basis of national origin in violation of the Title VI prohibition against national origin discrimination. Douglas County will, to the maximum extent feasible in its official deliberations and communications, community outreach and related notifications, provide appropriate alternative non-English formats for free to persons with LEP to access information and services provided.

It is Douglas County's policy to provide free language assistance services whenever an LEP person requests language assistance services. Any organization that receives federal funding from Douglas County is required to have a Language Assistance Plan in place or to utilize this plan in order to comply with federal requirements.

## IV. Douglas County LEP Needs

The Four Factor Analysis, included below, provides information on the number and percentage of LEP persons in Douglas County, and the nature, frequency and importance of the contact Douglas County staff and subgrantees have with LEP persons in providing services. All data provided is from the *American Community Survey 2014-2018 5-Year Estimates* from the U.S. Census Bureau.

The Census tracks both the number of people who speak a language other than English at home, and of those, the number who speak English less than "very well". The Census data on the population who speak English "well", "not well", and "not at all" are used to describe the population with LEP, for the purposes of this plan.

## Factor 1. Demography – The number or proportion of LEP persons eligible to be served or likely to be encountered in Douglas County.

#### **Population Breakdown**

The total population for Douglas County from the *American Community Survey 2014-2018 5-Year Estimates* is 328,614. Approximately 28,339 people speak a language other than English at home, which is 9.2% of the population five years and over. In the Denver-Aurora-Lakewood Metropolitan Statistical Area (MSA), 37 percent of individuals five years and over speak a language other than English at home.

Douglas County has a small population of people who have limited English proficiency. Of the 28,339 people who speak a language other than English at home, 6,749 or 24 percent, speak English less than very well. This is 2.2 percent of the total population five years and over, while for the MSA, it is 7.4 percent.

Population	# of People	% of People
Total population age 5 and over	308,690	
Only speak English	280,351	90.8%
Speak English and another language	21,590	7.0%
Do not speak English "very well"	6,749	2.2%

Seniors, people age 65 years and over, make up a disproportionately higher share of the population that speaks English less than very well in Douglas County. Although seniors are 11.6 percent of the population 5 years and over, they are 15.9 percent of the 6,749 people with LEP. This is different from the MSA where seniors are 13.1 percent of the population 5 years and over, but only 11.7 percent of the population with LEP.

Douglas County residents who speak a language other than English at home are highly educated. In Douglas County, 62 percent of people who speak a language other than English at home have bachelor degrees or higher, compared to 58 percent of the total Douglas County population. In the MSA, only 27 percent of the people who speak a language other than English at home have bachelor degrees or higher.

As is the case in the MSA, individuals in Douglas County who speak a language other than English at home have a higher incidence of poverty than the total population. The overall poverty rate in Douglas County is 3.4 percent, but for other language speakers it is 5.4 percent. Of the individuals with incomes below the poverty level, 14.3 percent do not speak English at home.

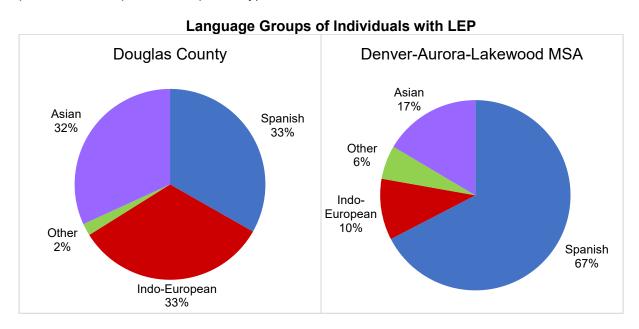
In general, compared to the MSA, the individuals who speak a language other than English at home in Douglas County are more likely to speak a language other than Spanish, and have a bachelor's degree

Compared to the total Douglas County population, individuals who speak a language other than English at home are more likely to be foreign-born, have a bachelor's degree, and have incomes below the poverty level

Certain areas of Douglas County have higher concentrations of people with limited English proficiency. Although the countywide average is 2.2 percent, census tracts with percentages higher than 4.0 are located within the population centers of Castle Rock, Lone Tree, Highlands Ranch, and Parker, and along the E-470 corridor east of I-25.

## Language Breakdown

Individuals with LEP in Douglas County speak a variety of languages. In the MSA, 67 percent of individuals with LEP speak Spanish, but in Douglas County, only 33 percent speak Spanish. Douglas County has a higher percentage of people who speak other Indo-European languages (33 percent) and Asian and Pacific Island languages (32 percent) than the MSA as a whole (10 percent and 16 percent, respectively).



In terms of individual languages, Spanish is the language most common among the people who speak English less than very well in Douglas County. Of the nearly 6,749 people with LEP, approximately 2,244 speak Spanish. The table below shows more detail about the languages spoken by the people with LEP in Douglas County.

Language Group	Language Spoken	# of People
Spanish	Spanish	2,244
Other Indo-European	French, Haitian, or Cajun	234
Other Indo-European	German	177
Other Indo-European	Russian, Polish, or other Slavic languages	465
Other Indo-European	Other Indo-European languages	1,341
Asian & Pacific Island	Korean	312
Asian & Pacific Island	Chinese	820
Asian & Pacific Island	Vietnamese	390
Asian & Pacific Island	Tagalog	207
Asian & Pacific Island	Other Asian and Pacific Island languages	420
All other languages	Arabic	70
All other languages	Other and unspecified languages	69
Total		6,749

## Language Breakdown by Household

Another way to account for individuals who have LEP is by their households. A person who does not speak English may live with other family members who do and who can translate for the individual. Households in which no one 14 years or older speaks English very well are considered to be "limited English speaking households". In Douglas County, only 0.9 percent of all households are limited English speaking households. For comparison, in the MSA, 3.5 percent of households are limited English speaking households.

Language Spoken	# of People	% of Households
Total households in which no one age 14 and older speaks	1,062	0.9%
English only or speaks English "very well"		
Asian and Pacific Island languages	422	0.4%
Other Indo-European languages	417	0.4%
Spanish	211	0.2%
Other languages	12	0.0%

## **Douglas County School District**

The Douglas County School District (DCSD) consists of 48 elementary schools, 9 middle schools, 9 high schools, 5 alternative schools, and 20 charter schools. The majority of students speak English; however, approximately 3,400 students out of a total student population of about 68,000 are English Learners.

## · Technology:

- o Google Translate
- Microsoft Outlook Translate
- Babel Fish www.babelfish.com (translates sentences)
- Language Line www.languageline.com (pay as you go services)

## V. Language Assistance

## **Acceptable Methods of Communication**

The following types of communication services are available:

## 1. Oral Interpretation Services:

Oral interpretation services will be provided to LEP persons in some form at no cost. If a bilingual employee is available they will be called upon to translate. If the LEP person has an adult family member or friend that can provide interpretive services that will be an option. The LEP person will be informed that an interpreter is available at no cost if they wish to use that person instead of a family member or friend due to privacy issues, comfort, etc. If all other options have been exhausted, an outside interpreter or telephone service line will be utilized. Douglas County staff will ensure that the LEP person's choice is voluntary, and that they are aware of their options.

### 2. Written Interpretation Services:

The number of LEP persons in Douglas County speaking one language is not high enough to warrant translating documents into a specific language. Clients will be assisted in completing forms, as necessary. Documents will be revisited and possibly revised, when, or if, the number of LEP persons increases and there is a greater need.

## **Language Assistance Protocol**

## 1. Telephone Assistance:

Callers who are limited in their English speaking abilities often have an English speaking person present when they call. If this is the case, the English speaking person will be asked if they are acting as the person's translator. If they are not, they will be asked what language the person speaks and arrangements will be made for translation services to be available at an agreeable time for all parties.

If the caller is unable to speak English and the language is recognizable, staff will find a bilingual employee or will assist the caller to the greatest extent possible, which may involve setting up a time when a translator would be available.

#### 2. Walk-in Assistance:

The majority of clients seeking services will be walk-in clients. A LEP person who walks into the office will be assisted to the greatest extent possible by Douglas County or subgrantee staff, or a bilingual employee, if available. The client can indicate the language they are speaking on an "I Speak" card. They will then be informed of their right to an interpreter free of charge. Arrangements will be made for translation services to be available at an agreeable time for all parties. Staff will follow the guidelines outlined above under "Acceptable Methods of Communication".

## 3. Written Assistance:

Douglas County staff will first try to assist the client to determine what documents they need or want. Once that has been identified, staff will find a translator to assist the client in completing the form for services. If it is a larger document they are interested in, such

as something they would like to provide public comments on, the interpreter will work with the client to provide an overview of the document, discuss specific topics the client is interested in, and the interpreter can inform staff of the client's comments regarding the topic.

At this time, the number of LEP persons speaking one language does not warrant that forms and other documents be available in that language. Douglas County staff will continue to monitor the County's demographics so that forms and documents are available in a different language when the population speaking that language exceeds 1,000 persons, or it is 5 percent of the population, whichever is less.

Although Douglas County has 2,547 individuals over the age of five who speak Spanish, many of those will not be seeking services as they are children. In relation to the number of households, there are only 1,296 people age 14 and older who are considered LEP. When that population is broken down by language, there is not one language that has more than 1,000 persons who speak it. Douglas County will continue to monitor the demographics and make adjustments as this number increases.

## 4. Interpreter Assistance:

If it is determined that an interpreter is necessary, Douglas County staff will keep an updated list of employees and external interpreters who speak a variety of languages that can be called upon, if necessary. This list will be updated annually and kept in the O:\Community Services\CDBG\Admin\LEP\_LAP folder.

## **Staff Compliance**

The general policy above denotes that all Douglas County Community and Resource Services and Subgrantees who are funded through this division are required to provide free language assistance services to LEP individuals and must inform the public about available language assistance services.

#### **Staff Training**

Training is critical so that staff can competently work with LEP persons and make the necessary accommodations to provide proper services. Additional training will be scheduled as needed. Community and Resource Services staff will be trained in:

- The LAP
- How to work with and respond to LEP persons
- Who to contact if the need for language assistance arises
- The location of documents available in other languages

## **Outreach Efforts**

Public notices that are published in the local newspapers will state that interpretive services are available on an as needed basis and who to contact to make arrangements. Copies of documents that are made available to the public for public comments as well as final or approved documents will contain information regarding interpretive services. Posters advertising public meetings or open houses will also contain contact information so that an interpreter can be available at the event, if requested.

## Monitoring and Updating the LAP

Douglas County does not expect the LEP population to increase drastically from year to year; therefore, the LAP will be updated every five years in conjunction with the Consolidated Plan. For the Consolidated Plan, CDBG staff conducts community and provider surveys to get a firm understanding of community services being offered, demographics of clients being served, etc.

## 2004 Census LANGUAGE IDENTIFICATION FLASHCARD ضع علامة في هذا المربع إذا كنت تقرأ أو تتحدث العربية. 1. Arabic Խնդրում են ջ նչում կատարեջ այս քառակուսում, եթե խոսում կամ կարդում եք Հայերեն: 2. Armenian যদি আপনি বাংলা পড়েন বা বলেন তা হলে এই বাক্সে দাগ দিন। 3. Bengali ឈូមបញ្ជាក់ក្នុងប្រអប់នេះ បើអ្នកអាន ឬនិយាយភាសា ខ្មែរ ។ 4. Cambodian 5. Chamorro Motka i kahhon ya yangin ûntûngnu' manaitai pat ûntûngnu' kumentos Chamorro. 6. Simplified 如果你能读中文或讲中文, 请选择此框。 Chinese 7. Traditional 如果你能讀中文或講中文,請選擇此框。 Chinese Označite ovaj kvadratić ako čitate ili govorite hrvatski jezik. 8.Croatian Zaškrtněte tuto kolonku, pokud čtete a hovoříte česky. 9. Czech 10. Dutch Kruis dit vakje aan als u Nederlands kunt lezen of spreken. 11. English Mark this box if you read or speak English. اگر خواندن و نوشتن فارسي بلد هستيد، اين مربع را علامت بزنيد. 12. Farsi

Cocher ici si vous lisez ou parlez le français.	13. French
Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen.	14. German
Σημειώστε αυτό το πλαίσιο αν διαβάζετε ή μιλάτε Ελληνικά.	15. Greek
Make kazye sa a si ou li oswa ou pale kreyòl ayisyen.	16. Haitian Creole
अगर आप हिन्दी बोलते या पढ़ सकते हों तो इस बक्स पर चिह्न लगाएँ।	17. Hindi
Kos lub voj no yog koj paub twm thiab hais lus Hmoob.	18. Hmong
Jelölje meg ezt a kockát, ha megérti vagy beszéli a magyar nyelvet.	19. Hungarian
Markaam daytoy nga kahon no makabasa wenno makasaoka iti Ilocano.	20. Ilocano
Marchi questa casella se legge o parla italiano.	21. Italian
日本語を読んだり、話せる場合はここに印を付けてください。	22. Japanese
한국어를 읽거나 말할 수 있으면 이 칸에 표시하십시오.	23. Korean
ໃຫ້ໝາຍໃສ່ຊ່ອງນີ້ ຖ້າທ່ານອ່ານຫຼືປາກພາສາລາວ.	24. Laotian
Prosimy o zaznaczenie tego kwadratu, jeżeli posługuje się Pan/Pani językiem polskim.	25. Polish

Assinale este quadrado se você lê ou fala português.	26. Portuguese
Însemnați această căsuță dacă citiți sau vorbiți românește.	27. Romanian
Пометьте этот квадратик, если вы читаете или говорите по-русски.	28. Russian
Обележите овај квадратић уколико читате или говорите српски језик.	29. Serbian
Označte tento štvorček, ak viete čítať alebo hovoriť po slovensky.	30. Slovak
Marque esta casilla si lee o habla español.	31. Spanish
Markahan itong kuwadrado kung kayo ay marunong magbasa o magsalita ng Tagalog.	32. Tagalog
ให้กาเครื่องหมายลงในช่องถ้าท่านอ่านหรือพูคภาษาไทย.	33. Thai
Maaka 'i he puha ni kapau 'oku ke lau pe lea fakatonga.	34. Tongan
Відмітьте цю клітинку, якщо ви читаєте або говорите українською мовою.	35. Ukranian
اگرآپ اردو پڑھتے یا بولتے ہیں تواس خانے میں نشان لگا ئیں۔	36. Urdu
Xin đánh dấu vào ô này nếu quý vị biết đọc và nói được Việt Ngữ.	37. Vietnamese
באצייכנט דעם קעסטל אויב איר לייענט אדער רעדט אידיש.	38. Yiddish



## **Bi-Lingual Employees**

Language	Name	Department	Phone Ext.
Dutch	Jonathan Rife	Weed Control	7476
French	Shelley Burek	Sheriff's	6332
German	Stephanie Cook	Treasurer	4246
Hungarian	Attila Denes	Sheriff's	7036
Spanish	Ed Martinez	Sheriff's	6560
Spanish	Marlene Fleming	IT	6166
Ukrainian	Helen Kellogg	Finance	4140



Julia S. Vang, Department Manager COLORADO LANGUAGE CONNECTION Asian Pacific Development Center (APDC) 1544 Elmira Street, Aurora, CO 80010

Office: 303-365-2959 Ext: 114 Emergency Contact #: 720-220-6742

Fax: 303-344-4599 Email: CLC@apdc.org

LIST OF PRICES			
Services		Hourly Rate	
Emergency (EMG) Interpretation*	General/ Medical	\$90.00	
	Legal	\$100.00	
In-Advance Request Interpretation**			
	General/ Medical	\$75.00	
	Legal Interpreting	\$85.00	
Phone Reminder/Confirmation Call***	General/ Medical Interpreting	\$18.75/15 minutes	
	Legal Interpreting	\$21.25/15 minutes	
Documentation		Varies by language	
Translation	Written Document		
Transcribing	Video, Voice Recording, ETC		
Web Testing & Translation Improvement	Website Testing		
Special Services	Advance Arrangement Required		
Weekend Appointment	EMG General/ Medical* EMG Legal* General/ Medical** Legal**	\$90.00 plus \$25 \$100.00 plus \$25 \$75.00 plus \$25 \$85.00 plus \$25	
American Sign Language		\$150.00-\$250.00	
Credit Card Payment	Additional Charge	Varies by Card	

<sup>\*</sup>Service requested with less than 24 hour notice

Both (\* and \*\*) includes in-person OR telephone interpretation with 3 or more parties involved (client, customer, interpreter)

<sup>\*\*</sup>Service requested with more than 24 hour notice

<sup>\*\*\*</sup>Involves only interpreter and client. Charged at 15 minutes increments Any cancellation less than 24 hour notice will still be charged and billed

## TRAVEL FEE & MILEAGE POLICY

\*\*\*\*Mileage on Mapquest.com website ONLY\*\*\*\*

For appointment between 30-80 miles round trip from APDC office (1544 Elmira Street, Aurora, CO 80010), \$33.00 FLAT FEE will be applied

## Some of the cities may include:

WHEAT RIDGE	ENGLEWOOD	LAKEWOOD	SHERIDAN
GOLDEN	LITTLETON	ARVADA	LAFAYETTE
BROOMFIELD	CASTLE ROCK	FIRESTONE	HIGHLANDS RANCH
WESTMINSTER	NORTHGLENN	LOUISVILLE	CENTENNIAL
EVERGREEN	PARKER	LONE TREE	BRIGHTON
MORISON	THORNTON	FREDERICK	

For appointments farther than 80 miles round trip from APDC office, a FLAT FEE and an additional \$0.45/mile will be applied

CITIES/AREAS INCLUDED	Mileage
CHEYENNE, WY	\$100.00
COLORADO SPRING	\$60.00
FORT COLLINS	\$60.00
GEORGETOWN	\$50.00
GREELEY	\$50.00
LONGMONT	\$40.00
LOVELAND	\$50.00
PUEBLO	\$50.00
ALAMOSE	\$250.00
FORT LUPTON	\$45.00
BACK HAWK	\$45.00
NEDERLAND	\$50.00

Approved by APDC-CLC 07/2011 Christia H. Whifile



## Communicate With Your limited English-Proficient (LEP) individuals within the US and across the globe.

Whether you or your staff need assistance communicating with Limited English speaking customers, clients, patients or simply for personal use when traveling domestically and abroad, in two effortless steps you can connect with a Professional interpreter, in over 200 languages, 24/7/365 days a year without the formality of a contract-and, you only pay for the minutes you use.

#### PERSONAL INTERPRETER CALL FLOW

- Dial the Personal Interpreter access number, enter your 8-digit PIN, and state the name of the language you need right into the phone. It will be Recognized by our speech recognition/response system
- You will be immediately connected to the appropriate interpreter.
- Charges begin when the interpreter joins the call and end when you hang
  up.
- Per minute charges include complementary domestic or international third party calls placed by our attendant for you, to anywhere in the world.
- Charges are billed to your Credit Card daily and kept securely.
- Once you receive your PIN, you can use it over and over again, without having to re-register.

### PERSONAL INTERPRETER SELF-SERVICE PORTAL

- View and print reports containing your usage, call history, and charges
- Retrieve lost Personal Identification Number (PIN)
- Update your account information
- · Download FREE training tools
- To access The Personal Interpreter Self-Service Portal, click here: <u>Self-Service Portal (https://webpi.languageline.com/webpi/go/)</u>

For more information, please call 1-800-528-5888. If you're located outside of North America call us at 1+831-648-7582, or you can also email us at WeCare@languageline.com (mailto:WeCare@languageline.com)

#### **Connect with an Interpreter**



(https://webpi.languageline.com/webpi/go/login/create/)

Self-Service Portal

- (https://webpi.languageline.com/webpi/go/)
- Complete the
   <u>sign up form</u>
   (https://webpi.languageline.com/webpi/go/login/create/
- · Receive your PIN instantly
- Dial a toll-free number and enter your PIN
- Connect with an interpreter or translator for your chosen language
- Usage billed at \$3.95 per minute and charged directly to your credit card

For more information about personal interpreter services contact our <u>customer service department</u> (mailto:WeCare@LanguageLine.com) or browse <u>frequently asked questions</u> (/solutions/interpretation/personal-interpreter/faq/).



(http://www.languageline.com/solutions/interpretation/per interpreter/personal-interpreter-sign-up-and-callflow-process/pi-image/)



## **DOUGLAS COUNTY COLORADO**

## DCTS CIVIL RIGHTS POLICY STATEMENT

Douglas County provides services without regard to race, color, religion, national origin, age, or disability, according to the provisions contained in Title VI of the Civil Rights Act of 1964, the Rehabilitation Act of 1973, as amended, the Americans with Disabilities Act of 1990, and Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations (Executive Order 12898).

To request additional information on Douglas County's Title VI and Nondiscrimination policy or to file a discrimination complaint, please contact the Mobility Program Coordinator, at <a href="mailto:transit@douglas.co.us">transit@douglas.co.us</a> or 303-660-7460. You may also contact the Colorado Department of Transportation's (CDOT) Civil Rights and Business Resource Center at 303-757-9234 or a complaint directly with the Federal Transit Administration, at FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.

The Complainant Procedure can be found by contacting the Mobility Program Coordinator or you may access CDOT's Complaint Procedure through their website (<a href="http://www.coloradodot.info/business/equal-opportunity">http://www.coloradodot.info/business/equal-opportunity</a>) or by requesting copies from CDOT's Civil Rights and Business Resource Center.

This complaint procedure and the Discrimination Complaint Form are available in Spanish at <a href="https://www.douglas.co.us/community/transportation/douglas-county-local-coordinating-council-lcc/">www.douglas.co.us/community/transportation/douglas-county-local-coordinating-council-lcc/</a> or by calling 303.660.7490

Este procedimiento de quejas y el formulario de quejas por discriminación están disponibles en español en <a href="www.douglas.co.us/community/transportation/douglas-county-local-coordinating-council-lcc/">www.douglas.co.us/community/transportation/douglas-county-local-coordinating-council-lcc/</a> o llamando al 303.660.7490.



## DOUGLAS COUNTY TRANSIT SOLUTIONS TITLE VI AND OTHER CIVIL RIGHTS STATUTES COMPLAINT PROCEDURE FOR FTA GRANT FUNDED TRANSPORTATION

Any person who believes she or he has been discriminated against on the basis of disability, race, age, color, national origin, gender, or limited English proficiency by any Douglas County transportation provider (hereinafter referred to as "Douglas County") may file a Title VI or other civil rights complaint by completing and submitting the agency's Title VI and Other Civil Rights Statutes Complaint Form. Douglas County only investigates complaints received no more than 180 days after the date the complainant becomes aware of the alleged discriminatory action. Douglas County will only process complaints that are complete.

Douglas County staff will assist complainants in filing complaints (if needed), and will forward grievances to the Civil Rights Coordinator for investigation or further assistance. Such assistance includes reasonable modifications and appropriate auxiliary aids and services necessary to file the grievance and participate in the grievance process. Such arrangements may include making the grievance procedure available in alternate formats such as Braille, large print, audiotape, providing interpreters for the deaf or hard-of-hearing or persons with limited English proficiency; or assuring a barrier-free location for proceedings.

An individual who is deaf or hard-of-hearing, or has limited English proficiency may prefer or request to use a family member or friend as an interpreter. However, family members or friends of the person will not be used as interpreters unless specifically requested by the individual and only after an offer of an interpreter at no charge to the person has been made by the Douglas County.

If the person chooses to use a family member or friend as an interpreter, Douglas County will consider issues including, but not limited to, competency of interpretation, confidentiality, privacy, possible domestic violence and/or undue influence, and conflict of interest will be considered. If Douglas County has any concerns pertaining to these issues or any other that may have a bearing on the appropriateness of the interpreter, Douglas County will deny the request.

The use of minor children as interpreters will be assessed on every case at every interaction. Minor children will only be allowed to function as an interpreter for questions of general, informational nature. Examples include requesting an application and scheduling an appointment.

Douglas County will not charge the individual any fee for interpretation or translation services, auxiliary aids or services, or costs associated with modifications.

Once the complaint is received, Douglas County 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.

Douglas County has 60 days to investigate the complaint. If more information is needed to resolve the case, the Douglas County may contact the complainant in writing.

The complainant has 10 business days from the date of the written request from the investigator 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, Douglas County can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue the 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 civil rights 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 to the decision, she/he has 15 business days after the date of the closure letter or the LOF to do so. A person may also file directly with the Colorado Department of Transportation, 2829 W. Howard Pl., Denver, Colorado, 80204 ATTN: Civil Rights and Business Resource Center- Title VI Complaints, 303-757-9234.

To make a complaint please contact the Douglas County Mobility Program Manager:

transit@douglas.co.us Phone: (303) 660-7460 Facsimile: (303) 379-4198 TDD: 1-800-659-3656 or 711

100 Third Street Castle Rock, Colorado 80104



## DOUGLAS COUNTY TRANSIT SOLUTIONS TITLE VI AND OTHER CIVIL RIGHTS STATUTES COMPLAINT PROCEDURE FOR FTA GRANT FUNDED TRANSPORTATION

Any person who believes she or he has been discriminated against on the basis of disability, race, age, color, national origin, gender, or limited English proficiency by any Douglas County transportation provider (hereinafter referred to as "Douglas County") may file a Title VI or other civil rights complaint by completing and submitting the agency's Title VI and Other Civil Rights Statutes Complaint Form. Douglas County only investigates complaints received no more than 180 days after the date the complainant becomes aware of the alleged discriminatory action. Douglas County will only process complaints that are complete.

Douglas County staff will assist complainants in filing complaints (if needed), and will forward grievances to the Civil Rights Coordinator for investigation or further assistance. Such assistance includes reasonable modifications and appropriate auxiliary aids and services necessary to file the grievance and participate in the grievance process. Such arrangements may include making the grievance procedure available in alternate formats such as Braille, large print, audiotape, providing interpreters for the deaf or hard-of-hearing or persons with limited English proficiency; or assuring a barrier-free location for proceedings.

An individual who is deaf or hard-of-hearing, or has limited English proficiency may prefer or request to use a family member or friend as an interpreter. However, family members or friends of the person will not be used as interpreters unless specifically requested by the individual and only after an offer of an interpreter at no charge to the person has been made by the Douglas County.

If the person chooses to use a family member or friend as an interpreter, Douglas County will consider issues including, but not limited to, competency of interpretation, confidentiality, privacy, possible domestic violence and/or undue influence, and conflict of interest will be considered. If Douglas County has any concerns pertaining to these issues or any other that may have a bearing on the appropriateness of the interpreter, Douglas County will deny the request.

The use of minor children as interpreters will be assessed on every case at every interaction. Minor children will only be allowed to function as an interpreter for questions of general, informational nature. Examples include requesting an application and scheduling an appointment.

Douglas County will not charge the individual any fee for interpretation or translation services, auxiliary aids or services, or costs associated with modifications.

Once the complaint is received, Douglas County 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.

Douglas County has 60 days to investigate the complaint. If more information is needed to resolve the case, the Douglas County may contact the complainant in writing.

The complainant has 10 business days from the date of the written request from the investigator 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, Douglas County can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue the 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 civil rights 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 to the decision, she/he has 15 business days after the date of the closure letter or the LOF to do so. A person may also file directly with the Colorado Department of Transportation, 2829 W. Howard Pl., Denver, Colorado, 80204 ATTN: Civil Rights and Business Resource Center- Title VI Complaints, 303-757-9234.

To make a complaint please contact the Douglas County Mobility Program Manager:

transit@douglas.co.us Phone: (303) 660-7460 Facsimile: (303) 379-4198 TDD: 1-800-659-3656 or 711

100 Third Street Castle Rock, Colorado 80104

or

Federal Transit Administration, at FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590

Si necesita información en español, comuníquese al (303) 660-7490.



# DOUGLAS COUNTY COLORADO

## DOUGLAS COUNTY TRANSIT SOLUTIONS TITLE VI AND OTHER CIVIL RIGHTS STATUTES COMPLAINT FORM FOR TRANSPORTATION SERVICES

Section I					
Name:					
Address:					
Phone (Home/Mobile)	:	Phone (W	ork):		
Email:		,	,		
Accessible Format	Large Print		Audio Ta	аре	
Requirements?	TDD		Other	•	_
Section II					
	plaint on your own beh	nalf?	Yes*		No
*If you answered "yes	" to this question, go to	Section III.			
If not, please supply t					
relationship of the per	son for whom you				
are complaining:					
Please explain why yo	ou have filed for a third	party:			
Please confirm that yo	ou have obtained the	V	es		No
permission of the agg		I	62		INO
are filing on behalf of					
Section III	a ama party				
	ation I experienced was	s based on	(check all that	at apply	·):
	·				
[] Race []Color	[] National Origin []	Gender [	] Age [] D	isability	
	· ·				
[] Limited English Pro	riciency				
Date of Alleged Discri	mination (month, Day,	Vearl.			
Date of Alleged Disort	mination (month, bay,	1 cai)			
Explain as clearly as i	oossible what happene	d and why v	ou believe v	ou were	<del>2</del>
	Describe all persons				
	the person(s) who disc				
	formation of any witnes	ses. If mor	e space is ne	eeded, <sub>l</sub>	please use
the back of this form.					

Section IV		
Have you previously filed a Civil Rights complaint with this	Yes	No
agency?		
Have you filed this complaint with any other Federal, State, or Federal or State Court?	local agency,	or with any
[] Yes [] No		
If yes, check all that apply:		
[] Federal Agency:		
	cy	
[] State Court [] Local Ager Please provide information about a contact person at the ager		o the
complaint was filed	icy/court wrier	e trie
Name:		
Title:		
Agency:		
Address:		
Telephone:		
Section V		
Name of the agency the complaint is against:		
Contact person:		
Title:		
Telephone number:		
You may attach any written materials or other information that your complaint.	you think is re	elevant to
Signature and date required below		
Signature Date		

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

Douglas County Mobility Program Coordinator

transit@douglas.co.us Phone: (303) 660-7460 Facsimile: (303) 379-4198

100 Third Street Castle Rock, Colorado 80104

## ADA

Title II of the Americans with Disabilities Act (ADA) requires that Douglas County make county facilities, programs, and services accessible to persons with disabilities in accordance with the standards of the ADA. If you feel that you have not been able to access a Douglas County facility, program, or service because of a lack of accessibility or that you have been discriminated against because of your disability, please complete the online <a href="Complaint Form">Complaint Form</a> or mail or deliver the complaint in person to:

Holly Carrell, ADA Coordinator 100 Third Street Castle Rock, CO 80104 ADACoordinator@douglas.co.us 303-660-7401

#### Additional Information:

- Douglas County Grievance Procedure under the ADA
- ADA.gov

# **Discrimination Complaint Form**

If you need assistance completing this form or require a different format or other accommodation, please contact the ADA Coordinator at 303-660-7401 or by email at ADACoordinator@douglas.co.us.

•	Name*
	First Middle Last
•	Address*
	Street Address Line 2 City State
	Province / Region ZIP / Postal Code
•	Phone* Email* My complaint is*
	▼ •

Please be specific and provide as much information as possible, including the date, time, location and names of people that were present.

•	By submitting this form, I affix my signature to				
	0		Yes		
	0		No		



## **DOUGLAS COUNTY COLORADO**

#### NOTICE OF THE PUBLIC

Douglas County has posted our Title VI Civil Rights Policy Statement on the Douglas County website. This posting or an approved copy of a provider agency's Civil Rights policy is posted in the provider agency lobbies and included in documentation that is passed out to potential clients.

## TITLE VI INVESTIGATIONS

Douglas County has had no Title VI complaints, investigations, or lawsuits related to the transit program.

## **PUBLIC PARTICIPATION**

- Douglas County conducts public meetings/hearings that are publicized on the County website. Notices are posted in both English and Spanish. These meetings are accessible to persons with disabilities.
- Douglas County has conducted surveys both for customer satisfaction and for input on the Transit Demand Analysis.
- Douglas County holds stakeholder, advisory committees, informational meetings and online community conversations for community engagement.
- Douglas County offers interpreters for use in any of the discussed public participation forums.
- Transportation to any and all of these meetings can be set up with one of our service providers.

#### MEMBERSHIP TABLE OF NON-ELECTED COMMITTES AND COUNCILS

\*Please see the attached table.

Douglas County Transit Solutions membership is open to any and all members of the community through either an organizational or individual membership. Douglas County has brought together a group of providers interested in increasing outreach efforts for residents who speak English as a second language. This group meets every other month to share information about services and resources they provide to Spanish-speaking clients. Several of the providers focus on serving the disabled population.

## **BOARD MEETING MINUTES APPROVING THE TITLE VI PLAN**

Douglas County has not presented the Title VI Plan to the Local Coordinating Council for approval. The plan has been presented and approved through the chain of command of the Mobility Manager.

## TITLE VI EQUITY ANALYSIS

Douglas County has not constructed any new transportation facilities during the past three years.

## Douglas County Transit Solutions Local Coordinating Council

Member	Agency	Race
Al Wonstolen	Liason-Castle Rock Senior Center	White
Allison Towe	Castle Rock Outlets	White
Amy Enos Branstetter	Douglas County	White
Amy Sherman	NW Douglas County	White
Arther Lehl	Douglas County	White
Barb Lotze	Visiting Angels	White
Barbara Drake	Douglas County	White
Becky Bowar	Care and Community	White
Bill Kelly		White
Bob Ward	Developmental Pathways	White
Briana Smith	United Way	White
Brodie Ayers	CDOT	White
Bryce Matthews	City of Parker	White
Carol Buchanan	DRMAC	White
Chuck Wilson	Castle Rock	White
Daniel Makelky	Douglas County	White
David Maxwell	Douglas County	White
Deb Bosch	Developmental Pathways	White
Debbi Hayne	Castle Rock Senior Activity Center	White
Diane Leavesley	Douglas County Housing Partnership	White
Donna Grattino	DC School District	White
Gary Cox	To The Rescue	White
Gene Sawa	Arapahoe County	Hispanic or Latino
Greg Howden	DC Sheriff	White
Hans Friedel	City of Lone Tree	White
Jan Dengal	Parker Senior Center	White
Jeff Case	Highlands Ranch	White
Jen Briggs	American Cancer Society	White
Jennifer Eby	Douglas County	White
Jennifer Walker	Crisic Center	White
Jerry Flannery	HRCA	White
Jodie McCann	Highlands Ranch	White
Karie Erickson	Aging Resources of Douglas County	White
Kati Rider	Douglas County	White
Katie Byers	School District	White
Keith Baker	Young Life	White
Kent Dyson	Developmental Pathways	White
Kevin Fox	Aging Resources of Douglas County	White
Louise West	Parker Senior Center	White
Lynn Robinson	Easter Seals	White
Mary Lou Fenton	Wellspring	White
Mary Munekata	Town of Parker	White
Brian Matthews	RTD	White

Maureen Waller	Douglas County	White
Rand Clark	Douglas County	White
Renee Williams	To The Rescue	White
Roberta Madril	Castle Rock	Hispanic or Latino
Ruby Richards	Douglas County	White
Sam Bishop	Castle Pines	White
Scott Matson	Douglas County	White
Sean McBride	Metro Taxi	White
Steve Koster	Douglas County	White
Steve Roloff	Broken Tree	White
Suzanne O'Neill	Consultant	White
Terrie Sherrow	Individual member	White
Terry Shipley	Auburn Ridge	White
Thomas Coogan	Route Match	White
Thomas Reiff	Castle Rock	White
Tina Dill	Douglas County	White
Tina Newlin	New Day	Black or African American