

Transportation

Title VI Plan

Date Adopted: January 4, 2016

Purpose:

The purpose of this plan is to establish guidelines to effectively monitor and ensure that Lifeworks Transportation is in compliance with all Federal Title VI requirements and regulations in order to carry out the provisions of the USDOT Federal Title VI .

Section 1: Plan Statement

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that “no person in the United States shall, on the 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 financial assistance” (42 U.S.C. Section 2000d).

Lifeworks Transportation is committed to ensuring that no person is excluded from participation in, or denied the benefits of, its transit services on the basis of race, color, or national origin, as protected by Title VI Civil Rights under 49 CFR Part 21 and Part 303. This plan was developed to guide Lifeworks Transportation in its administration and management of Title VI related activities. This statement is posted in federally funded transit vehicles, in the entryway of all of our facilities, and on our internal and external websites.

Transportation Manager
Lifeworks Services, Inc.
2965 Lone Oak Drive, Suite 160 Eagan MN 55121

Section 2: Subcontractors and Vendors

All subcontractors and vendors who receive payments from Lifeworks where funding originates from any federal assistance are subject to the provisions of Title VI of the Civil Rights Act of 1964 as amended. Written contracts shall contain non-discrimination language, either directly or through the bid specification package which becomes an associated component of the contract

Section 3: Record Keeping

The Transportation Manager will maintain permanent records, which include, but are not limited to, signed acknowledgements of receipt from the employees indicating the receipt of the Lifeworks Title VI Plan, copies of the Title VI complaints or lawsuits and related documentation, and records of correspondence to and from complainants and Title VI investigations.

Section 4: Title VI Complaint Procedures

How do you file a Title VI Complaint?

The complainant must file a signed, written complaint no later than one-hundred-eighty (180) days from the date of the alleged discrimination. The complaint should contain the following:

- Your name, mailing address, and how to contact you (i.e. telephone numbers, email address, etc.)
- How, When, Where, and why you believe you were discriminated against; include the location, names, and contact information (phone numbers, email addresses, etc.) of any witnesses
- Other information that you deem significant to your complaint

The Lifeworks Title VI Complaint Form (see Appendix C) may be used to submit the complaint information. The complaint must be filed in writing to the following address:

Lifeworks Services, Inc.
Attn: Transportation Manager
2965 Lone Oak Drive, Suite 160 Eagan, MN 55121

Note: Lifeworks encourages all complainants to certify all mail that is sent through the U.S. Postal Service and/or ensure that all written correspondence can be tracked easily. For complaints originally submitted by fax or email, an original, signed copy of the complaint must be mailed to the Lifeworks Transportation Manager as soon as possible, but no later than one-hundred-eighty (180) days from the alleged date of discrimination.

What Happens to the complaint after it is submitted?

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

A letter acknowledging receipt of the complaint (see appendix B) will be mailed to the complainant. If additional information is needed to resolve the complaint,

Lifeworks may contact the complainant. The complainant will have thirty (30) business days from the date of the letter to provide the additional requested information to Lifeworks.

Administrative Closure of a Complaint

If additional information is requested to complete the complaint process, and it is not received by Lifeworks within thirty (30) days, Lifeworks Transportation Manager will administratively close the complaint.

Also, a complaint can be administratively closed if the complainant notifies Lifeworks she or he wants to discontinue pursuing the complaint.

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

Lifeworks will send a final written response letter (see Appendix C and D) to the complainant. In the event that the complaint is not substantiated (Appendix D), the response letter advises the complainant of their right to **1)** appeal within seven (7) calendar days of receipt of the final written decision from Lifeworks ; and/or **2)** file a complaint externally with the Federal Civil Rights Office. Every effort will be made to respond to the Title VI complaints within 60 working days of receipt of such complaints, if not sooner.

Section 5: Management Responsibility

The Lifeworks Transportation Manager, President and CEO, and/or Human Resources Manager, receiving information regarding alleged violation(s) of this order shall determine if there is any basis for the allegation and shall proceed with initiating an investigation as warranted.

Each Manager and Supervisor shall:

- Ensure that there are no barriers to service or accommodation that would prevent public transit usage
- Train subordinates as to what constitutes discrimination and barriers to access
- Take prompt and appropriate action to avoid and minimize the incidence of any forms of discrimination
- Notify the Transportation Supervisor in writing of the circumstances surrounding any reported allegations of discrimination no later than the next business day

Section 6: Limited English Proficiency (LEP) Plan

Title VI and its implementing regulations require that federally funded recipients take responsible steps to ensure meaningful access to the benefits, services,

information, and other important portions of their programs and activities for individuals who are Limited English Proficient (LEP).

Each Manager and Supervisor shall:

- Ensure that there are no barriers to service or accommodation that would prevent public transit usage
- Train subordinates as to what constitutes discrimination and barriers to access
- Take prompt and appropriate action to avoid and minimize the incidence of any forms of discrimination
- Notify the Transportation Manager in writing of the circumstances surrounding any reported allegations of discrimination no later than the next business day

Section 7: Appendix Reference

Community outreach is a requirement of Title VI. Recipients and sub-recipients shall seek out and consider the viewpoints of minority and low-income populations in the course of conducting public outreach. Recipients have wide latitude to determine what specific measures are most appropriate and should make this determination based on the composition of the affected population, the public involvement process, and the resources of Lifeworks. Lifeworks Services, Inc. has an external website used to provide information and potential partnership opportunities with the Twin Cities and surrounding communities. Lifeworks also employs Career Placement Counselors that seek out job opportunities in the community for individuals with disabilities. Lifeworks Services, Inc. clients also volunteer in the communities at different locations.

Appendix A	Lifeworks Title VI Complaint Form and Consent/Release Form for Discrimination Complaint
Appendix B	Sample Letter Acknowledging Receipt of Complaint
Appendix C	Sample Letter Notifying the Complaint is Substantiated
Appendix D	Sample Letter Notifying the Complaint is Not Substantiated
Appendix E	Sample of Narrative Displayed in Revenue Vehicles and Facilities

Appendix A: Title VI Complaint Form and Consent/Release Form for Discrimination Complaint

Title VI of the 1964 Civil Rights Act requires 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.”

If you believe you have been discriminated against in transit services, please contact Lifeworks for the necessary documents for filing a complaint.

The Lifeworks Discrimination Complaint Form and Complaint Consent/Release Form are available upon verbal or written request; as well as on the Lifeworks website, lifeworks.org

Lifeworks
2965 Lone Oak Drive, Suite 160
Eagan, MN 55121
651-365-2837

Concern or Formal Compliant Report

A person served (client), their legal representative, or a Lifeworks staff member may report a concern, or file a formal grievance or complaint as described in the Lifeworks Grievances Policy and Procedure, or a Title VI Complaint (transportation discrimination of protected classes).

Procedure:

Please submit the concern or complaint report by contacting a Lifeworks Customer Service Representative at 651-454-2732, toll free at 1-866-454-2732, by emailing Mary Lenertz directly at mlenertz@lifeworks.org or by postal mail to Mary Lenertz, Vice President of Services at 2965 Lone Oak Drive, Suite 160, Eagan, MN 55121. To submit a concern or complaint anonymously, please call 1-877-767-7781 or email Lifeworks@getintouch.com. You may request assistance from a Lifeworks staff member in completing this form.

Today's Date:

Type of Report: Concern Feedback Formal Complaint Title VI Complaint

If Title VI compliant, type of discrimination experienced:

Race Color National Origin

Name of person reporting:

Contact information (phone number, email, etc.):

Name of the person served and relationship to the person reporting:

Name of the person completing this form:

Nature of the concern, feedback or formal complaint:

Appendix B: Sample Letter Acknowledging Receipt of Complaint

[Today's Date]

[Complainant Title and Name]

[Address]

[City, State ZIP Code]

Dear [Complainant Title and Name]:

This letter is to acknowledge receipt of your complaint against Lifeworks Transportation alleging [complaint].

An investigation will begin shortly. If you have additional information you want to convey or questions concerning this matter, please feel free to contact [Name of Transportation Manager] by calling [xxx-xxx-xxxx], or write to me at the address below.

If additional information is required by Lifeworks to complete the complaint documents and/or process, the following sentences may be appropriate.

Lifeworks is in need of the following information to thoroughly investigate your complaint.

[Information/documentation being requested]

Please provide the requested information no later than thirty (30) days from date of letter.

If the information is not received by this date, the complaint will be administratively closed.

Sincerely,

[Name]

[Title]

[Contact Information]

Appendix C: Sample Letter Notifying Complainant the Complaint is Substantiated

[Today's Date]

[Complainant Title and Name]

[Address]

[City, State ZIP Code]

Dear [Complainant Title and Name],

The matter referenced in your letter, dated [mm|dd|yyyy] against Lifeworks Transportation alleging [allegation], a Title VI violation, has been investigated.

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

Thank you for calling this important matter to our attention. You were extremely helpful during our review of the program.

If a hearing is requested, the following sentence may be appropriate.

You may be hearing from this office, or from federal authorities, if your services should be needed during the administrative hearing process.

Sincerely,

[Name]

[Title]

[Contact Information]

Appendix D: Sample Letter Notifying Complainant the Complaint is Not Substantiated

[Today's Date]

[Complainant Title and Name]

[Address]

[City, State ZIP Code]

Dear [Complainant Title and Name],

The matter referenced in your complaint, dated [mm|dd|yyyy] against Lifeworks Transportation alleging [allegation], a Title VI violation, has been investigated.

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

Lifeworks Transportation has analyzed the materials and facts pertaining to your case for evidence of our failure to comply with any of the civil rights laws. There was no evidence found that any of these laws have been violated.

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

You have the right to **1)** appeal within seven (7) calendar days of receipt of this final written decision from Lifeworks , and/or **2)** file a complaint externally with the Federal Civil Rights Division [Address of the Civil Rights Division is entered here].

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

Sincerely,

[Name of Transportation Manager]

Transportation Manager

[Contact Information]

Appendix E: Sample of Narrative Displayed in Revenue Vehicles and Facilities

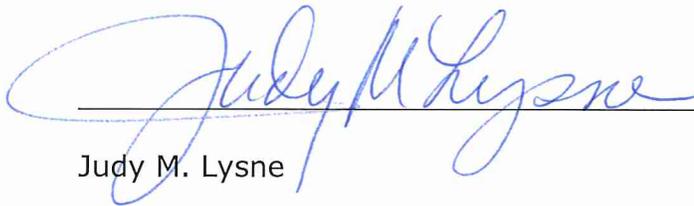
Notifying the Public of Rights Under Title VI

Lifeworks Services, Inc.

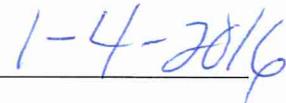
- Lifeworks Services, Inc. operates its programs and services without regard to race, color, national origin, sexual orientation, marital status or political affiliation in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with Lifeworks Services, Inc. For more information on Lifeworks Services, Inc. and our civil rights program and the procedures to file a complaint, contact 651-454-2732, TTY 651-365-3736, or file a written complaint to 2965 Lone Oak Drive Suite 160 Eagan, MN 55121. For more information, visit www.lifeworks.org
- If information is needed in another language, contact 651-454-2732

Title VI Plan Review:

Lifeworks Federal Title VI Plan, adopted as of January 4, 2016, has been reviewed and approved by Judy M. Lysne, President and CEO.



Judy M. Lysne



Date