



<b>AgeWell Services of West Michigan</b>	
<b>Policy Name:</b> Title VI Policy	
<b>Policy No.</b> HR 3.27	<b>Effective Date:</b> 7/1/2019
<b>Approved:</b>	<b>Last Revised:</b> 12/5/2023

**SCOPE:** AgeWell Services of West Michigan, hereinafter referred to as AWS, is committed to ensuring that no person is excluded from participation in, be denied the benefits of its programs and services on the basis of race, color, or national origin. This policy applies to all team members, including paid employees, subcontractors, vendors, and volunteers.

**POLICY:**

Statement

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

This plan was developed to guide AWS in its administration and management of Title VI related activities.

**Title VI Coordinator Contact Information**

AgeWell Services of West Michigan  
Attn: Jennifer Drury, Title VI Coordinator  
275 W Clay Ave Ste 100, Muskegon, MI 49440  
Phone: (231) 733-8635  
Fax: (231) 733-8635  
Email: [jennifer@agewellservices.org](mailto:jennifer@agewellservices.org)

Title VI Dissemination

Title VI information posters (see Appendix H of HR 3.27.3) shall be prominently and publicly displayed in AWS facility and on their vehicles. The name of the Title VI Coordinator is posted and available at AWS offices and <https://www.agewellservices.org/senior-transportation/>. Additional information relating to nondiscrimination obligation can be obtained from AWS Title VI Coordinator.

Nondiscrimination information shall be disseminated to AWS team members (paid and unpaid) annually (see Appendices A and B of HR 3.27.3). This information reminds team members, including paid team members, subcontractors, vendors and volunteers of Title VI and of their nondiscrimination responsibilities in their daily work and duties. All paid team members of AWS are provided a copy of the plan and are required to sign an Acknowledgement of Receipt (see Appendix A of HR 3.27.3). All subcontractors, vendors and volunteers are required to acknowledge Title VI (see Appendix B of HR 3.27.3)

During orientation, new team members shall be informed of the provisions of Title VI and AWS expectations to perform their duties accordingly.

#### Subcontractors and Vendors

All subcontractors and vendors who receive payments from AWS 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.

#### Record Keeping

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

**ENFORCEMENT:** This policy is enforced by the Senior Transportation Program Senior Manager, Mission Services Senior Manager, Mission Services Director, Food Services Director, Finance Director, Human Resources Director, Advancement Director and Executive and Associate Directors.

#### **REFERENCES:**

HR 3.27.2 Title VI Procedure

HR 3.27.3 Title VI Appendices



<b>AgeWell Services of West Michigan</b>	
<b>Policy Name:</b> Title VI Procedure	
<b>Policy No.</b> HR 3.27.2	<b>Effective Date:</b> 7/1/2019
<b>Approved:</b>	<b>Last Revised:</b> 12/5/2023

**SCOPE:** AgeWell Services of West Michigan, hereinafter referred to as AWS, is committed to ensuring that no person is excluded from participation in, be denied the benefits of its programs and services on the basis of race, color, or national origin. This Title VI Procedure applies to all team members, including paid employees, subcontractors, vendors, and volunteers.

**PROCEDURE:**

Complaint Procedure – Submitting Complaint

The complainant may file a signed, written complaint up to one hundred and eight (180) days from the date of the alleged discrimination. The complaint should include the following information:

- Your name, mailing address and how to contact you (i.e. telephone number, email address, etc.).
- How, when, where and why you believe you were discriminated against. Include the location, names and contact information of any witnesses.
- Other information that you deem significant.

The Title VI Complaint Form (see Appendix C of HR 3.27.3) may be used to submit the complaint information. The complaint may be filed in writing or by email with the AWS at the following address:

AgeWell Services of West Michigan  
 Attn: Jennifer Drury, Title VI Coordinator  
 275 W Clay Ave Ste 100, Muskegon, MI 49440  
 Phone: (231) 733-8635  
 Fax: (231) 733-8635  
 Email: jennifer@agewellservices.org

AWS 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 facsimile, an original, signed copy of the complaint must be mailed to the Title VI Coordinator as soon as possible, but not later than one hundred eighty days (180) from the alleged date of discrimination.

### Complaint Procedure – After Complaint is Submitted

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

A letter acknowledging receipt of complaint will be mailed within seven (7) days (see Appendix D of HR 3.27.3). Please note that in responding to any requests for additional information, a complainant's failure to provide the requested information may result in the administrative closure of the complaint.

### Complaint Procedure – Communication to Complainant Regarding Outcome of Complaint

AWS will send a final written response letter (see Appendix E, F or G of HR 3.27.3) to the complainant. In the letter notifying complainant that the complaint is not substantiated (see Appendices F or G of HR 3.27.3), the complainant is also advised of his or her right to 1) appeal within seven (7) calendar days of receipt of the final written decision from AWS, and / or 2) file a complaint externally with the Federal Transit Administration Office of Civil Rights (specific to Senior Transportation Program) or the U.S. Department of Justice Federal Coordination and Compliance Section Civil Rights Division (for all other AWS programs). Every effort will be made to respond to Title VI complaints within 60 business days of receipt of such complaints, if not sooner.

Once sufficient information for investigating the complaint is received by AWS, a written response will be drafted subject to review by the AWS'S attorney. If appropriate, AWS'S attorney may administratively close the complaint. In this case, AWS will notify the complainant of the action as soon as possible.

In addition to the complain process described above, a complainant may file a Title VI complaint with the following offices:

*If for the Senior Transportation Program:*

Federal Transit Administration Office of Civil Rights  
Attn: Title VI Program Coordinator  
East Building, 5<sup>th</sup> Fl – TCR  
1200 New Jersey Ave SE, Washington, DC 20590

*If for Congregate Meal Sites, Driftwood Café, Home Delivered Meals, SafeSeniors, Senior Center Activities, Senior Discount Dine at the Driftwood Café or Wellness Center Programs:*

U.S. Department of Justice  
Federal Coordination and Compliance Section

Title VI Investigations, Complaints and Lawsuits

To date, there have been no Title VI investigations, complaints or lawsuits against any AWS services. Should there be, the below table will be updated.

**Lawsuits, Complaints or Investigations Alleging Discrimination**

Type <i>(investigation, lawsuit, complaint)</i>	Date	Summary of Complaint	Status	Action(s) Taken

Public Participation Plan

The AWS community and minority outreach plan is based on the following principles:

- Flexibility – the engagement process will accommodate participation in a variety of ways and be adjusted as needed.
- Inclusiveness – AWS will proactively reach out to and engage low-income, minority and LEP populations from the AWS service area. For LEP Policy and Procedure, reference PS 1.7 and 1.7.1.
- Respect – all feedback will be given careful and respectful consideration.
- Initiative Taking and Timeliness – participation methods will allow for early involvement and be ongoing.
- Clear, Focused and Understandable – participation methods will have a clear purpose and use for the input and will be described in language that is easy to understand.
- Honest and Transparent – information provided will be accurate, trustworthy and complete.
- Responsiveness – AWS will respond and incorporate appropriate public comments into programmatic decisions as able.
- Accessibility – meetings will be held in locations which are fully accessible and welcoming to all area residents, including, but not limited to, low-income and minority members of the public and in locations relevant to the topics being presented and discussed.

As an AWS receiving federal financial assistance, AWS has made the following community and minority outreach efforts since the last submission of a Title VI program:

- Board of Directors meetings
  - The Board of Directors hold quarterly meetings and the public are invited to attend.

- Community Committees
  - In an attempt to coordinate services and address community needs, paid AWS team members are members of many committees. These include, but aren't limited to,
    - Community Coordinating Counsel
    - Muskegon Pride Day Sponsors
    - Muskegon Rotary Club
    - Retired Senior Volunteer Program Advisory Committee
    - Senior Advocates Coalition
    - Specialized Transportation Services Committee
    - United Way of the Lakeshore Board of Directors
    - Women's Division Chamber of Commerce Committee
  
- Complaint Process
  - Team members and participants put all complaints in writing and direct them to our Title VI Coordinator. Refer to HR 3.27, 3.27.2 and 3.27.3 for additional information.
  
- Surveys
  - Team members, both paid and unpaid, are invited to complete team member satisfaction and feedback surveys annually. These are provided in a variety of formats, including both print and digital.
  - Mission Services participants (Home Delivered Meals, Lunch & Activity Centers, Wellness and Fitness, Senior Center Activities and Discount Dining) are invited to complete participant satisfaction and feedback surveys bi-annually.
  - Senior Transportation Program participants are invited to complete participant satisfaction and feedback surveys annually.
  - SafeSeniors outreach participants are invited to complete attendee satisfaction and feedback surveys after every outreach event.
  
- Public Notice
  - When Michigan Department of Transportation (MDOT) Section 5310 applications are submitted to MDOT, we are required to have a public notice, which includes a thirty (30) day public comment period.
  
- Public Presentations and Outreach
  - AWS presents public presentations regarding our services to community organizations, including, but not limited to, Lions Clubs, Rotary Clubs, Muskegon County municipalities, Women's Division Chamber of Commerce, Latinos for the Future, various neighborhood association and the United Way of the Lakeshore.
  
- Services Awareness

- AWS currently publishes hours of service and changes as able.
- Transit Improvement Plan
  - The Transit Improvement Plan (TIP) is a fiscally constrained three-year planning document that address transportation projects and programs, including federal, state and local highways, transit, ride sharing, bike paths and pedestrian facilities. If an item we wish to purchase is not in the TIP, it can't be funded. The TIP process includes public hearings and public comment period.

Membership of Non-Elected Committees and Councils

AWS doesn't select the members of the Local Advisory Committee (LAC) or other community committees listed in the community outreach section of this document. However, demographics of population of all service counties (all ages) and current LAC are provided below:

Body	Caucasian	Latino	African American	Asian American	Native American
Muskegon County Service Population	75.6%	6.4%	14%	0.7%	.9%
Oceana County Service Population	80.8%	15.6%	1.3%	0.4%	1.5%
Ottawa County Service Population	82.9%	10.5%	2.1%	2.9%	0.6%
Local Advisory Committee <i>(specific for Senior Transportation Program ONLY)</i>	100%	0%	0%	0%	0%

Equity Analysis

If AWS constructs a facility, such as a vehicle storage facility, maintenance facility, operations center or other building, it will do a Title VI equity analysis following the procedures listed below:

- AWS shall complete a Title VI equity analysis during the planning stage regarding where a project is located or sited to ensure the location is selected without regard to race, color or national origin.
- When evaluating locations of facilities, agencies should give attention to other facilities with similar impacts in the area to determine if any cumulative adverse impacts might result.
- If AWS determines that the location of any project will result in a disparate impact based on race, color or national origin, AWS may only locate the project in that location if there is a substantial legitimate justification for location the project there, and where there are no alternative locations that would have a less disparate impact based on race, color or national origin.

**ENFORCEMENT:** This policy is enforced by the Senior Transportation Program Senior Manager, Mission Services Senior Manager, Mission Services Director, Food Services Director, Finance Director, Human Resources Director, Advancement Director (Title VI Coordinator) and Executive and Associate Directors.

**REFERENCES:**

HR 3.27 Title VI Policy

HR 3.27.3 Title VI Appendices

PS 1.7 Limited English Proficiency (LEP) Policy

PS 1.7.1 Limited English Proficiency (LEP) Procedure