

Home of Hope, Inc.

Dba: Home of Hope, Inc.

Title VI Program

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A. Introduction

HOME OF HOPE, INC agrees to comply with all provisions prohibiting discrimination on the basis of race, color, or national origin of Title VI of the Civil Rights Act of 1964, as amended, 42 U.S.C. 200d *et seq.*, and with U.S. DOT regulations, “Nondiscrimination in Federally-Assisted Programs of the Department of Transportation – Effectuation of Title VI of the Civil Rights Act,” 49 CFR part 21.

HOME OF HOPE, INC assures that no person shall, as provided by Federal and State civil rights laws, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity. **HOME OF HOPE, INC** further ensures every effort will be made to ensure non-discrimination in all programs and activities, whether those programs and activities are federally funded or not.

HOME OF HOPE, INC meets the objectives of the FTA Master Agreement which governs all entities applying for FTA funding, including **HOME OF HOPE, INC** and its third-party contractors by promoting actions that:

- A. Ensure that the level and quality of transportation service is provided without regard to race, color, or national origin.
- B. Identify and address, as appropriate, disproportionately high and adverse effects of programs and activities on minority populations and low-income populations.
- C. Promote the full and fair participation of all affected Title VI populations in transportation decision making.
- D. Prevent the denial, reduction, or delay in benefits related to programs and activities that benefit minority populations or low-income populations.
- E. Ensure meaningful access to programs and activities by persons with Limited English Proficiency (LEP).

B. Agency Information

1. Mission of HOME OF HOPE, INC

Home of Hope, Inc is a non-profit organization whose mission is to provide residential and vocational services to men and women with developmental, and other disabilities, by promoting choices, independence and a meaningful way of life.

2. History (including year started)

Home of Hope was established in Vinita, Oklahoma in October 1968. We have evolved from one facility providing residential service and activities to as many as 96 men and women to over 60 locations providing residential and vocational services to over 250 men and women with intellectual disabilities.

3. Regional Profile (regional population; growth projection)

Home of Hope offers services in 8 northeast Oklahoma counties: Craig, Ottawa, Mayes, Delaware, Tulsa, Creek, Nowata, and Rogers. Populations in these counties range from approximately 14,000 to over 693,000.

4. Population served (in relation to regional population)

Home of Hope serves primarily men and women that receive services in our programs. These service recipients are considered low-income persons with disabilities, both intellectual and physical.

5. Service area (include map, with any routes utilized)

Home of Hope's service area includes the counties of Craig, Mayes, Ottawa, Delaware, Tulsa, Creek, Nowata and Rogers and will include service in areas outside of this depending on the needs of the men and women being transported.

6. Governing body make-up (include terms of office)

Home of Hope is governed by a 19 member Board of Directors which consists of volunteers from the community and family members of the men and women we serve. Officer terms start and end in September of each year.

C. Notice to the Public

NOTIFYING the PUBLIC of RIGHTS UNDER TITLE VI (NAME OF HOME OF HOPE, INC)

- Home of Hope, Inc. operates its programs 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 (HOME OF HOPE, INC).
- For more information on Home of Hope, Inc.'s civil rights program, and procedures to file a complaint, contact Dena Pitts (918-256-7825); email (dena.pitts@homeofhope.com); or visit our administrative office at (226 W Dwain Willis Ave, Vinita, OK 74301)
- A complainant may file a complaint directly with the Oklahoma Department of Transportation by filing a complaint with the Contract Compliance Division, Attention: Contract Compliance Division Manager, 200 NE 21st Street, Oklahoma City, OK 73105-3204.
- If information is needed in another language contact: Dena Pitts at 918-256-7825

***LIST OF LOCATIONS**

The Title VI notice is located in all vehicles as well as the Administrative offices at 226 W Dwain Willis Ave, Vinita, OK 74301.

D. Procedure for Filing a Title VI Complaint

Filing a Title VI Complaint

The complaint procedures apply to the beneficiaries of **HOME OF HOPE, INC's** programs, activities, and services.

RIGHT TO FILE A COMPLAINT: Any person who believes they have been discriminated against on the basis of race, color, or national origin by **HOME OF HOPE, INC** may file a Title VI complaint by completing and submitting the agency's **Title VI Complaint Form**. Title VI complaints must be received in writing within 180 days of the alleged discriminatory complaint.

HOW TO FILE A COMPLAINT: Information on how to file a Title VI complaint is posted on our agency's website, and in public areas of our agency.

You may download the **HOME OF HOPE, INC** Title VI Complaint Form at **www.homeofhope.com**, or request a copy by writing to **226 W Dwain Willis Ave, Vinita, OK 74301**. Information on how to file a Title VI complaint may also be obtained by calling **HOME OF HOPE, INC** at **918-256-7825**

You may file a signed, dated complaint no more than 180 days from the date of the alleged incident. The complaint should include:

- Your name, address and telephone number.
- Specific, detailed information (how, why and when) about the alleged act of discrimination.
- Any other relevant information, including the names of any persons, if known, the agency should contact for clarity of the allegations.

Please submit your complaint form to Dena Pitts 226 W Dwain Willis Ave, Vinita OK 74301

COMPLAINT ACCEPTANCE: **HOME OF HOPE, INC** will process complaints that are complete.

Once a completed Title VI Complaint Form is received, **HOME OF HOPE, INC** will review it to determine **HOME OF HOPE, INC** has jurisdiction. The complainant will receive an acknowledgement letter informing them whether or not the complaint will be investigated by **HOME OF HOPE, INC**.

INVESTIGATIONS: **HOME OF HOPE, INC** will generally complete an investigation within 90 days from receipt of a completed complaint form. If more information is needed to resolve the case, **HOME OF HOPE, INC TITLE VI COORDINATOR** may contact the complainant. Unless a longer period is specified by **HOME OF HOPE, INC TITLE VI COORDINATOR**, the complainant will have ten (10) days from the date of the letter to send requested information to **HOME OF HOPE, INC** investigator assigned to the case.

If the requested information is not received within that timeframe the case will be closed. Also, a case can be administratively closed if the complainant no longer wishes to pursue the case.

LETTERS OF CLOSURE OR FINDING: After the Title VI investigator reviews the complaint, the Title VI investigator will issue one of two letters to the complainant: a closure letter or 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.
- A Letter of Finding (LOF) summarizes the allegations and provides an explanation of the corrective action taken.

If the complainant disagrees with **HOME OF HOPE, INC's** determination, the complainant may request reconsideration by submitting the request in writing to the Title VI investigator within seven (7) days after the date of the letter of closure or letter of finding, stating with specificity the basis for the reconsideration. **HOME OF HOPE, INC** will notify the complainant of the decision either to accept or reject the request for reconsideration within ten (10) days. In cases where reconsideration is granted, **HOME OF HOPE, INC** will issue a determination letter to the complainant upon completion of the reconsideration review.

A person may also file a complaint directly with the Federal Transit Administration, at the FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.

If information is needed in another language, contact **HOME OF HOPE, INC Chief Operating Officer at 226 W Dwain Willis Ave Vinita, OK 74301, or at 918-256-7825.**

E. Monitoring Title VI Complaints, Investigations, Lawsuits and Documenting Evidence of Agency Staff Title VI Training

Documenting Title VI Complaints/Investigations

All Title VI complaints will be entered and tracked in **HOME OF HOPE, INC's** complaint log. Active investigations will be monitored for timely response on the part of all parties. The agency's Title VI Coordinator shall maintain the log.

Agency Title VI Complaint Log

Date complaint filed	Complainant	Basis of complaint R-C-NO	Summary of allegation	Pending status of complaint	Actions taken	Closure Letter (CL)	Letter of Finding (LOF)	Date of CL or LOF

Documenting Evidence of Agency Staff Title VI Training

HOME OF HOPE, INC's staff is given Title VI training, and agency can answer affirmatively to all the following questions:

1. Are new employees made aware of Title VI responsibilities pertaining to their specific duties?
2. Do new employees receive this information via employee orientation?
3. Is Title VI information provided to all employees and program applicants?
4. Is Title VI information prominently displayed in the agency and on any program materials distributed, as necessary?

Public Participation Plan

Goal

The goal of the Public Participation Plan is to have significant and ongoing public involvement, by all identified audience, in the public participation process for major agency outreach efforts.

Objectives

- To understand the service area demographics and determine what non-English languages and other cultural barriers exist to public participation.
- To provide general notification of meetings and forums for public input, in a manner that is understandable to all populations in the area.
- To hold public meetings in locations that are accessible to all area stakeholders, including but not limited to minority and low income members of the community.
- To provide methods for two-way communication and information and input from populations which are less likely to attend meetings.
- To convey the information in various formats to reach all key stakeholder groups.

Identification of Stakeholders

Stakeholders are those who are either directly or indirectly affected by an outreach effort, system or service plan or recommendations of that plan. Stakeholders include but are not limited to the following:

- Board of Directors – the governing board of the agency. The role of the Board is to establish policy and legislative direction for the agency. The Board defines the agency’s mission, establishes goals, and approves then budget to accomplish the goals.
- Advisory Bodies – non-elected advisory bodies review current and proposed activities of the agency, and are encouraged to be active in the agency’s public participation process. Advisory bodies provide insight and feedback to the agency.
- Agency Transit riders and clients
- Minority and low income populations, including limited English proficient persons
- Local jurisdictions and other government stakeholders
- Private businesses and organizations
- Employers
- Partner agencies

Elements of the Public Participation Plan

It is necessary to establish a public participation plan that includes an outreach plan to engage minority and limited English proficient (LEP) populations.

Elements of the Public Engagement Plan include:

1. Public Notice

- a. Official notification of intent to provide opportunity for members of the general public to participate in public engagement plan development, including participation in open Board/council meetings, and advisory committees.

2. Public Engagement Process/Outreach Efforts:

- a. Public meetings
- b. Open houses
- c. Rider forums
- d. Rider outreach
- e. Public hearings
- f. Focus groups
- g. Surveys
- h. Services for the Disabled (Notices of opportunities for public involvement include contact information for people needing these or other special accommodations.)

Events such as public meetings and/or open houses are held at schools, churches, libraries and other non-profit locations easily accessible to public transit and compliant with the Americans with Disabilities Act.

3. Public Comment

- a. Formal public comment periods are used to solicit comments on major public involvement efforts around an agency service or system change.
- b. Comments are accepted through various means:
 - i. Dedicated email address.
 - ii. Website.
 - iii. Regular mail.
 - iv. Forms using survey tool for compilation.
 - v. Videotaping.
 - vi. Phone calls to Customer Service Center [phone]

4. Response to Public Input

All public comments are provided to the Board of Directors prior to decision making. A publicly available summary report is compiled, including all individual comments.

Title VI Outreach Best Practices

HOME OF HOPE, INC ensures all outreach strategies, communications and public involvement efforts comply with Title VI. **HOME OF HOPE, INC's** Public Participation Plan proactively initiates the public involvement process and makes concerted efforts to involve members of all social, economic, and ethnic groups in the public involvement process. Aligned with the above referenced communication tactics, **HOME OF HOPE, INC** provides the following:

- a. Public notices published in non-English publications (if available).
- b. Title VI non-discrimination notice on agency's website.
- c. Agency communication materials in languages other than English (subject to Safe Harbor parameters).
- d. Services for Limited English Proficient persons. Upon advance notice, translators may be provided.

Title VI Program Public Participation Process

HOME OF HOPE, INC will conduct a Public Participation Process for the 2026-2030 Title VI Program. This process includes Community Meetings to seek input, provide education, and highlight key components of the Title VI Plan. Materials have been created to explain Title VI policies as well as provide education on how they relate to minority populations.

HOME OF HOPE, INC will provide briefings to the Board of Directors and Advisory Bodies.

HOME OF HOPE, INC will conduct a 30 day public comment period to provide opportunities for feedback on the 2026-2030 Title VI Program.

Comments are accepted during the public outreach period via:

- a. Email
- b. Mail
- c. Phone
- d. In person

F. Language Assistance Plan

HOME OF HOPE, INC Limited English Proficiency Plan

This limited English Proficiency (LEP) Plan has been prepared to address HOME OF HOPE, INC 's responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964; Federal Transit Administration Circular 4702.1B, dated October 1, 2012, which states that the level and quality of transportation service is provided without regard to race, color, or national origin.

Executive order 13166, titled "Improving Access to Services for Persons with Limited English

Proficiency," indicates that differing treatment based upon a person's inability to speak, read, write or understand English is a type of national origin discrimination. It directs each federal agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discriminations do not take place. This order applies to all state and local agencies which receive federal funds.

Service Area Description:

Home of Hope's service area is defined by eight counties in northeast Oklahoma. These counties include Craig, Mayes, Ottawa, Rogers, Tulsa, Creek, Delaware, and Nowata.

HOME OF HOPE, INC has developed this LEP Plan to help identify reasonable steps for providing language assistance to persons with limited English proficiency who wish to access services provided by HOME OF HOPE, INC. As defined in Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write or understand English. This plan outlines how to identify a person who may need language assistance, and the ways in which assistance may be provided.

In order to prepare this plan, HOME OF HOPE, INC undertook the **four-factor LEP analysis** which considers the following factors:

Four Factor Analysis

1. The number and proportion of LEP persons eligible to be served or likely to be encountered in the service area:

A significant majority of people in the HOME OF HOPE, INC service area are proficient in the English language. Based on 2010 Census data, [4.3%] of the population five years of age and older speak English "less than very well" – a definition of limited English proficiency

LEP Population in HOME OF HOPE, INC Service Area					
Population 5 years and over by language spoken at home and ability to speak English	Rogers County	Tulsa County	Service Area Sector [1]	Service Area Total	Percentage of Population 5 Years and Older
<u>Population 5 Years and Over</u>	95,240	669,279			

Speak English "less than very well"	1.5	5.7			
<u>Spanish</u>	71%	71%			
Speak English "less than very well"					
<u>Other Indo- European</u>	5%	5%			
Speak English "less than very well"					
<u>Asian and Pacific Island</u>	20%	20%			
Speak English "less than very well"					
<u>All Other</u>	4%	4%			
Speak English "less than very well"					

2. Frequency of Contact by LEP Persons with HOME OF HOPE, INC's Services:

The HOME OF HOPE, INC staff reviewed the frequency with which office staff, dispatchers and drivers have, or could have, contact with LEP persons. To date, HOME OF HOPE, INC has, on average, **no requests** for an interpreter. HOME OF HOPE, INC averages **no** phone calls per month.

The following tools were utilized to determine frequency of contact:

LEP Staff Survey Form

HOME OF HOPE, INC is studying the language assistance needs of its riders so that we can better communicate with them if needed.

1. How often do you come into contact with passengers who do not speak English or have trouble understanding you when you speak English to them?

DAILY WEEKLY MONTHLY LESS THAN MONTHLY

2. What languages do these passengers speak?
3. What languages (other than English) do you understand or speak?
4. Would you be willing to serve as a translator when needed?

Frequency of Contact with LEP Persons	
Frequency	Language Spoken by LEP Persons
Daily	
Weekly	
Monthly	
Less frequently than monthly	

3. The importance of programs, activities or services provided by HOME OF HOPE, INC to LEP persons:

Outreach activities, summarized in HOME OF HOPE, INC’s Title VI Public Engagement Plan, include events such as public meetings and/or open houses held at schools, churches, libraries and other non-profit locations, and include specific outreach to LEP persons to gain under-standing of the needs of the LEP population, and the manner (if at all) needs are addressed.

Outside Organization LEP Survey
<p>Organization: _____</p> <ol style="list-style-type: none"> 1. What language assistance needs are encountered? 2. What languages are spoken by persons with language assistance needs? 3. What language assistance efforts are you undertaking to assist persons with language assistance needs? 4. When necessary, can we use these services?

4. The resources available to HOME OF HOPE, INC and overall cost to provide LEP assistance:

Strategies for Engaging Individuals with Limited English Proficiency include:

1. Language line. Upon advance notice, translators can be provided.
2. Language identification flashcards.
3. Written translations of vital documents (identified via safe harbor provision)
4. One-on-one assistance through outreach efforts.
5. Website information.
6. To the extent feasible, assign bilingual staff for community events, public hearings and Board of Directors meetings and on the customer service phone lines.

As applicable: Based on our demographic analysis (Factor 1) HOME OF HOPE, INC has determined that no language group(s) within its service area meets Safe Harbor criteria requiring written translated “vital documents” by language group(s).

HOME OF HOPE, INC will provide assistance and direction to LEP persons who request assistance.

Staff LEP Training

The following training will be provided to **HOME OF HOPE, INC** staff:

1. Information on **HOME OF HOPE, INC** Title VI Procedures and LEP responsibilities.
2. Description of language assistance services offered to the public.
3. Use of Language Identification Flashcards.
4. Documentation of language assistance requests.

Monitoring and Updating the LEP Plan

The LEP Plan is a component of **HOME OF HOPE, INC's** Title VI Plan requirement.

HOME OF HOPE, INC will update the LEP plan as required. At minimum, the plan will be reviewed and updated when it is clear that higher concentrations of LEP individuals are present in the **HOME OF HOPE, INC** service area. Updates include the following:

1. How the needs of LEP persons have been addressed.
2. Determine the current LEP population in the service area.
3. Determine as to whether the need for, and/or extent of, translation services has changed.
4. Determine whether local language assistance programs have been effective and sufficient to meet the needs.
5. Determine whether **HOME OF HOPE, INC's** financial resources are sufficient to fund language assistance resources as needed.
6. Determine whether **HOME OF HOPE, INC** has fully complied with the goals of this LEP Plan.
7. Determine whether complaints have been received concerning **HOME OF HOPE, INC's** failure to meet the needs of LEP individual.

G. Advisory Bodies

Table Depicting Membership of Committees, Councils, By Race

Committee	Caucasian	Latino	African American	Asian American	American Indian	Total
Board of Directors	12	-	-	-	7	100%

H. Subrecipient Assistance

HOME OF HOPE, INC does not have any subrecipients.

I. Subrecipient Monitoring

HOME OF HOPE, INC does not have any subrecipients.

J. Equity Analysis of Facilities

HOME OF HOPE, INC has not constructed any storage facilities, maintenance facilities, or operations centers in the last three years.

TITLE VI COMPLAINT FORM –

The **Home of Hope** is committed to ensuring that no person is excluded from participation in or denied the benefits of its services on the basis of race, color, or national origin, as provided by the Title VI of the Civil Rights Act of 1964, as amended. The Title VI complaints must be filed within 180 calendar days from the date of the alleged discrimination.

Date of Filing:	
Name:	
Address:	
City, State, Zip Code:	
Work Phone:	
Home Phone:	
E-mail Address:	

Home of Hope, Inc.
226 W Dwain Willis Ave
Vinita, OK 74301
Phone: (918) 256-7825

Indicate on what ground(s) you believe you have been discriminated against (check all that apply):

- Race Color National Origin

Indicate the person(s) who you believe discriminated against you:

Name(s):	
Work Location (if known):	
Work Phone:	
Date of alleged incident	

If you have an attorney representing you concerning the matters raised in this complaint, please provide the following:

Name:	
Address:	
Work Phone:	
E-mail Address:	

Explain why you believe discrimination has occurred. If there are witnesses, please provide names, addresses and telephone numbers. Be sure to include how other persons were treated differently than you. Attach additional pages as necessary and any written material pertaining to your case.

What remedy are you requesting? Please be specific:

Have you filed or do you intend to file a charge or complaint concerning the matters raised in this complaint with any other agencies (Federal, State, or local):

Yes

No

If so, please provide the following information:

Agency:

Address:

Name of Investigator (if known):

Phone Number:

E-mail Address:

Date Filed:

Status of case:

I confirm that I have read the above charge(s) and it is true to the best of my knowledge.

Print or typed name of complainant:

--

Signature

Date

Completed forms must be submitted to Home of Hope.
If you require any assistance in filling out this form please contact the **Home of Hope** Title VI Coordinator at **918-256-7825**.

The **Home of Hope** ensures that no person or groups of persons shall, on the grounds of race, color, sex, religion, national origin, age, disability, retaliation or genetic information, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any and all programs, services, or activities administered by **Home of Hope**. To request an accommodation please contact the **Home of Hope** ADA Coordinator at **918-256-7825**.

