

**Community Action Development Corporation
Title VI Plan
Date Adopted: 3-10-2023**

I. Plan Statement

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in all 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.

As protected by Title VI, Community Action Development Corporation is committed to ensuring that no person is excluded from participation in, or denied the benefits of any provided services on the basis of race, color, or national origin.

This plan was developed to guide Community Action Development Corporation in its administration and management of Title VI related activities.

Title VI Coordinator Contact information:
Title VI Coordinator – Rob Meador
Community Action Development Corporation
105 South Main Street
PO Box 989
Frederick, OK 73542
Phone: (580)335-5588 or Fax (580)335-3092

II. Title VI Information Dissemination

Title VI information posters shall be prominently and publicly displayed in all facilities housing Community Action Development Corporation programs. Information will also be posted on our website, www.cadconnections.com. Additional information relating to nondiscrimination obligation can be obtained from the CADC Title VI Coordinator. Title VI information shall be given to CADC supervisors and employees via the Employee Education form (see Appendix A) on an annual basis starting August 1, 2012. This form reminds employees of CADC's policy statement, and of their Title VI responsibilities in their daily work and duties. During New Employee Departmental Orientation, new employees shall be informed of the provisions of Title VI, and CADC's expectations to perform their duties accordingly.

All Community Action Development Corporation employees shall be provided a copy of the Title VI Plan and are required to sign the Acknowledgment of Receipt. This signed document will be placed in the employee's personnel file.

III. Subcontracts and Vendors

All Community Action Development Corporation subcontractors and vendors who receive payments from CADC 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 CADC contracts shall contain non-discrimination language, either directly or through the bid specification package which becomes an associated component of the contract.

IV. Record Keeping:

The CADC Human Resources will maintain permanent records, which include, but are not limited to, signed acknowledgments of receipt from the employees indicating the receipt of the Community Action Development Corporation Title VI Plan, copies of Title VI complaints or lawsuits and related documentation, and records of correspondence to and from complainants, and Title VI investigations.

V. Title VI Complaint Procedures

Each Federal agency that provides Federal financial assistance as well as CADC as a recipient of Federal financial assistance is responsible for investigation complaints of discrimination on the basis of race, color, or national origin in the use of its funds. If you believe that you or others protected by Title VI have been discriminated against, you may file a complaint with the Federal agency that provides funds for the program where you believe the discrimination is occurring or Community Action Development Corporation.

The Title VI Client Complaint/Grievance Form should be used to submit the complaint information. The complaint must be filed in writing at the following address:

Title VI Coordinator - Rob Meador
Community Action Development Corporation
105 S. Main Street
PO Box 989
Frederick, OK 73542

NOTE: CADC encourages all complainants to certify all mail that is sent through the U.S. Postal Service.

A signed, written complaint should be filed **within 180 days** of the date of the alleged discrimination. The Title VI Complaint form can be picked up at CADC's office or Appendix C on this Policy. Information from the complaint should include:

1. Your name, address, and telephone number. Your complaint must be signed. If you are filing on behalf of another person, include your name, address, telephone number, and your relation to that person (e.g., friend, attorney, parent, etc.).
2. The name and address of the agency, institution, or department you believe discriminated against you.
3. How, why, and when you believe you were discriminated against. Include as much background information as possible about the alleged acts of discrimination. Include names of individuals whom you allege discriminated against you, if you know them.
4. The names of any persons, if known, that the investigating agency may contact for additional information to support or clarify your allegations.

What happens to the complaint after it is submitted?

All written formal complaints alleging discrimination based on race, color, age, gender, religion, political affiliation, disability or national origin in a service or benefit provided by Community Action Development Corporation will be directly addressed by the CADC Executive Director. CADC shall also provide appropriate referrals to complainants, including those persons with disabilities, or who are limited in their ability to communicate in English. Additionally, CADC shall make every effort to address all complaints in an expeditious and thorough manner. A letter acknowledging receipt of complaint will be mailed within ten days.

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.

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

Once sufficient information for investigating the complaint is received by CADC an investigation will begin. The complaint will be forwarded to the appropriate funding source with a copy of the investigation report. The funding source will issue a letter of receipt to the complainant within ten days. Upon completion of the investigation, complainant will receive a letter of finding from the funding agency. The complainant will be advised of his or her right to 1) appeal within seven calendar days of receipt of the final written decision from CADC, and/or 2) file a complaint externally with the Oklahoma Department of Commerce, U.S. Department of Transportation and/or the FTA. Every effort will be made to respond to Title VI complaints within 60 working days of receipt of such complaints, if not sooner.

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

Department of Commerce

Oklahoma Department of Commerce
Division of Community Affairs & Development
900 North Stiles Ave.
Oklahoma City, OK 73104

or

Department of Justice

U.S. Department of Justice
Office for Civil Rights
Office of Justice Programs
U.S. Department of Justice
810 7th Street, NW
Washington, DC 20531

or

Federal Transit Administration Office of Civil Rights

Attention: Title VI Program Coordinator
East Building, 5th Floor - TCR
1200 New Jersey Ave., SE
Washington, DC 20590

VI. Limited English Proficiency (LEP)

Introduction

The purpose of this Limited English Proficiency section is to meet the requirement of Title VI of the Civil Rights Act of 1964 and implementing regulations and Executive Order 13166 "Improving Access to Services for Persons with Limited English Proficiency" reprinted at 65 FR50121 (August 16, 2000).

Definition

A Limited English Proficiency person is one who does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English. CADC proposes the following framework for providing access to transportation activities and programs.

Four Factor Analysis

Factor 1: The percentage of LEP persons served or encountered in Red River Transportation's service population.

Based on analysis of 2020 Census Data CADC's 17 county service area averages 4.9 % population of Spanish residents and these levels are equal to statewide levels, so an LEP Plan has been completed.

Factor 2: The frequency of which an LEP individual comes into contact with Red River Transportation services.

Daily, past interactions from our dispatchers and drivers have shown that LEP individuals call our offices and use our demand response service vehicles for transportation on a daily basis as well as transporting individuals to and from dialysis treatment 3 times per week.

Factor 3: The importance of the service provided by our programs for LEP individuals.

An LEP individuals inability to utilize our services due to language barrier, affects his/hers ability to gain access to medical facilities, gainful employment, education, and local resources.

Factor 4: Resources that are available to the recipients.

Our transit director is bilingual in Spanish as well as 4 drivers and our mechanic. We try to reach out to family members to help assist and overcome the language barrier. We also have printed Title VI brochures that are translated to Spanish in our transportation offices: Frederick, Sayre, and Ryan.

Language Assistance Measures

CADC has or will implement the following LEP procedures.

- CADC will remind all employees on an annual basis to immediately report whenever they become aware of a real or potential language issue.
- All CADC employees will be provided with the "I Speak Cards" to assist in identifying the language being spoken.
- CADC employees will call the Title VI Coordinator for further advice should they need interpreter services.

Community Action Development Corporation Staff Training

Community Action Senior Transportation staff will be provided with LEP information/ procedures. This information will also be part of orientation process for new hires in the department.

Training topics are listed below:

- Staff will be briefed on understanding the Title VI policy and LEP responsibilities;
- Employees will be briefed on what language assistance services CADC offers and how to utilize those services;
- Drivers will be trained in the use of LEP "I Speak Cards",
- Employees will be trained in how to handle a Title VI and/or LEP complaint

Outreach Techniques

Key print materials will be translated into Spanish (the leading second language in the area) and made

available along with other agency outreach.

Updating the LEP Framework

This LEP framework will be updated as needed.

VII. Community Outreach

Community Action Development Corporation has engaged the public in its planning and decision-making processes, as well as its marketing and outreach activities. From 2016-2022, the public was invited to participate in these activities:

Public Notice/Public Comment Period: Community Action Development Corporation submits an application for funding annually to the Oklahoma Department of Transportation. The application requests funding for both capital and operating assistance. Part of the annual application is a public notice, including a 30-day public comment period followed by county Hearings.

Board Meetings: Community Action Development Corporation's Board of Directors holds monthly meeting and the public is welcome to attend.

Customer Non-Title VI Complaint Process: Clients/service users may call Community Action Development Corporation at (580)335-5588, 1-866-511-038 (toll free) 1-800-559-7344 (toll free TTY) to obtain procedures to lodge a complaint or comment about transportation in writing. All written complaints/comments are distributed to the relevant manager who researches the complaint and responds back to the citizen.

Community Needs Assessment: Each department of Community Action Development Corporation distributes periodic Community Needs Surveys to its clients and the public, including questions about community needs. These are compiled into a Community Needs Assessment to inform the agency and the community about the needs of its clients, and especially low-income people.

VIII. Environmental Justice

Community Action Development Corporation will perform an annual review of policies, performance, and routes to insure there is no willful or unintentional disparity of services provided to any group, neighborhood or community.

**NOTIFYING the PUBLIC of RIGHTS UNDER TITLE VI
Community Action Development Corporation**

- "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" For further information or if you feel that you have been discriminated against, please contact Red River Transportation, 105 S. Main St., Frederick, OK 7354
- Any person that feels they have been discriminated against may file a complaint directly with the Federal Transit Administration's Civil Rights Office. Information about how to prepare a complaint may be obtained by contacting FTA Assistance Line toll-free at (888)446-4511.
- If any information is needed in another language contact: (580)335-5588
- Si necesita informacion en otro idioma pongase en contacto con nosotros.

This Notice to Public is posted in all Community Action Development Corporation facilities and on our website, www.cadconnections.com

**NOTIFICACIÓN al PÚBLICO de DERECHOS DE BAJO TÍTULO VI
Comunidad Acción Desarrollo Corporación**

- "No Persona en el Unido Los Estados deberán: en el posoderaza Coloru origen nacional. ser excluido de participaciónen, se le nieguen los beneficios de, o ser sometido a la discriminación en virtud de cualquier programa o actividad Recibir Federal asistencia financiera" Para Más información o si sientes que han sido discriminados contra Por favor contacto Rojo Transporte fluvial, 105 S. Calle Principal, Frederick, OK 7354
- Cualquier La persona que sienta que ha sido discriminada puede presentar una solicitud una queja directamente con el Administración Civil de Tránsito Oficina de Derechos. Información acerca de Cómo prepararse un La queja puede obtenerse mediante ponerse en contacto con FTA Assistance Línea gratuita al (888)446-4511.
- Si cualquier información es necesario en otro idioma contacto: (580)335-5588
- Si necesita información en otro idioma pongase en contacto con nosotros.

Este Aviso al público está publicado en todas las instalaciones de Community Action Development Corporation y en nuestro sitio web. www.cadconnections.com



Client Complaint/Grievance Form

Name: _____ Today's Date: _____

Physical Address: _____

Mailing Address: _____

City/State/Zip: _____

Complaint: (please provide in detail): _____

Type of Alleged discrimination. (please check) None: _____
Race: _____ Color: _____
National Origin: _____
Other: _____

Date of complaint occurrence: _____

This complaint is being made against:
Name: (if known) _____ Program: _____

What action, if any, has been taken so far?

What action, if any, do you suggest we take?

(if additional writing space is needed, you may write on reverse side of this form or attach additional sheets)

Signature of Complainant

**Community Action Development Corporation
Letter Acknowledging Receipt of Complaint**

(Date)

Ms. Jo Doe
1234 Main St.
Clarksville, Tennessee 37040

Dear Ms. Doe,

This letter is to acknowledge receipt of your complaint against Community Action Development Corporation alleging _____.
An investigation will begin shortly. If you have additional information you wish to convey or questions concerning this matter, please feel free to contact this office by telephoning (580)335-5588 or writing to me at this address.

Sincerely,

Title VI Coordinator – Rob Meador
Community Action Development Corporation
PO Box 989
Frederick, OK 73542

TITLE VI SELF-SURVEY

TITLE VI SELF-SURVEY		
Name of Program:	CADC dba Red River Transportation	
Date Filed with ODOT/Transit Programs Division:		
Survey Date:	2-27-23	
Period Covered:		
A. Summary of complaints:	0	
B. Number of complaints for the period:	0	
C. Number of complaints voluntarily unresolved:	0	
D. Number of complaints currently unresolved:	0	
E. Attach a summary of any type of complaint and provide:	N/A	
• Name of complainant:		
• Race:		
• Allegation:		
• Findings:		
• Corrective Action:		
• Identify any policy/procedure changes made as a result of the complaint:		
• Provide the date history: <i>(date complaint received through resolution)</i>		
Distribution of Title VI Information		
1. Are new employees made aware of the Title VI responsibilities pertaining to their specific duties?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>

2. Do new employees receive this information via employee orientation?	YES <input checked="" type="checkbox"/> _____	NO _____
3. Is Title VI information provided to all employees and program applicants?	YES <input checked="" type="checkbox"/> _____	NO _____
4. Is Title VI information prominently displayed in the organization and on relevant program materials?	YES <input checked="" type="checkbox"/> _____	NO _____
5. Identify any improvements you have implemented since the last self-survey to support Title VI communication to employees and program applicants:	N/A	
6. Identify any improvements you plan to implement before the next self-survey to support Title VI communication to employees and program applicants:	Keep items updated.	
7. Identify any problems encountered with Title VI compliance, and discuss possible remedies:	N/A	
Signature: Gilbert Nuncio		
Title: Transit Director		
Date: 2-27-23		

Advisory Bodies

Red River Transportation does not have any advisory committees.

Sub recipient Assistance

Red River Transportation does not have any sub recipients.

Sub recipient Monitoring

Red River Transportation does not have any sub recipients.

Equity Analysis of Facilities

Red River Transportation has not constructed and facilities in the last three years.

Community Action Development Corporation

BY -LAWS

Adopted: April 5, 2021

A handwritten signature in black ink, appearing to read "Eddie Whitworth", written in a cursive style.

Eddie Whitworth, Chairman

Board of Directors

ARTICLE I

NAME, DESCRIPTION AND PURPOSES

Section A

The name of this corporation shall be Community Action Development Corporation, a non-profit corporation incorporated under the laws of the State of Oklahoma and recognized as exempt from Federal income tax under the Internal Revenue Code Section 501(c)(3). To carry out the purposes and functions set out in these By-Laws.

Section B

The Central Office of the Community Action Development Corporation shall be located at Frederick, Tillman County, Oklahoma.

ARTICLE II

SCOPE OF ACTIVITIES

The Corporation is organized and shall be operated exclusively for charitable and educational purposes within the meaning of section 501(c)(3) of the Internal Revenue Code of 1986, as now in force or as hereafter amended, (the "Internal Revenue Code" or the "Code") or the corresponding provision of any future United States internal revenue law. Specifically, the corporation's purposes are to: reduce poverty, revitalize housing and other services in low-income communities, empower low-income families and individuals to become self-sufficient; educate the public on issues of poverty and community revitalization; and encourage and promote improvement of community life in Oklahoma and, in particular in Jefferson, Cotton, Tillman, Kiowa, Washita, Beckham, and Roger Mills Counties.

In furtherance thereof, the corporation is authorized to engage in any activities that further its charitable and educational purposes and to exercise any powers conferred upon corporations organized pursuant to the provisions of the general corporation law of Oklahoma as now in

effect or as may hereafter be amended, provided that such activities and powers may be lawfully carried on and exercised by an organization incorporated under the general corporation law of Oklahoma and exempt from federal income tax under section 501(c)(3) of the Internal Revenue Code. Notwithstanding any other provision of these articles, the corporation shall not carry on any activities not permitted to be carried on by a corporation exempt from federal income tax under section 501(c)(3) of the Internal Revenue Code or by a corporation, contributions to which are deductible under Section 170(c)(2) of the Internal Revenue Code.

ARTICLE III

BOARD OF DIRECTORS – SIZE AND COMPOSITION

Section A

Board Authority and Size

The business affairs of the corporation managed by or under the direction of the Board of Directors. The Board shall consist of members residing within the Agency service area. The size of the Board shall be established by the Board of Directors and must be divisible by three. The Board of Directors shall consist of 21 members. One alternate may be selected to represent each Board member in their absence and shall be elected or appointed in the same manner as the Board member.

Section B

Board Composition

- **Low-Income Sector**

Representative of the poor shall be elected to membership on the Board in the manner prescribed herein and shall serve for a period of no more than three (3) consecutive years.

- **Public Sector Directors:**

qualified.

ARTICLE XIII
GOVERNING POWERS

Section A

1. In accordance with Section 211-E of the Community Services Block Grant, the Board of Directors of the Community Action Development Corporation shall have the following powers.
2. The Board shall have the power to receive and administer funds and contributions from private or local public sources, and to receive and administer funds under any Federal or State assistance program pursuant to the requirement of those programs.
3. The Board shall have the power to transfer funds so received and to delegate powers to other agencies subject to its overall program responsibilities.
4. The Board shall have the power to contract and to do any and all acts necessary to carry out its function in accordance with Community Services Block Grant as amended.