**3.3 TITLE VI (NONDISCRIMINATION) POLICY AND GRIENVANCE PROCEDURE Amended 5-2017, Updated 11-2018.**

**Policy of Nondiscrimination:** Skamania County Senior Services (SCSS), a department of Skamania County government, assures that no person shall on the grounds of race, color, national origin, sexual orientation or sex as provided by Title VI of the Civil Rights Act of 1964, and the Civil Rights Restoration Act of 1987 be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any SCSS sponsored program or activity. SCSS further assures that every effort will be made to ensure nondiscrimination in all of its programs and activities, whether those programs and activities are federally funded or not.

In the event that SCSS distributes Federal aid funds to another entity, it will include Title VI

language in all written agreements and will monitor for compliance.

**Authorities:** Title VI of the 1964 Civil Rights Act provides that no person in the United States shall on the grounds of race, color, national origin or sex be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving Federal financial assistance. The Civil Rights Restoration Act of 1987 broadened the scope of Title VI coverage by expanding the definition of terms "programs or activities" to include all programs or activities of Federal Aid recipients, sub­ recipients, and contractors, whether such programs and activities are federally assisted or not. *(Public Law 100-259 {S.557]* March 22, 1988).

**Responsibilities:** The Senior Services Program Manager is authorized to ensure compliance with the provisions of the agencies policy of nondiscrimination and with the law. The Senior Services Program Manager, or person delegated by the Program Manager in writing, will perform the duties of the Title VI Coordinator for SCSS and ensure implementation of SCSS's non-discrimination policy. The Title VI Coordinator is

responsible for initiating, monitoring, and ensuring SCSS's compliance with Title VI

requirements.

**Dissemination of SCSS's Title IV Policy:** SCSS will disseminate its Title VI Policy and

Complaint Procedure by:

• Including the policy on the Skamania County website under the Senior Services program.

• Posting the policy at the SCSS Office and Congregate Meal Site.

• Provide the policy and complaint procedure in all SCSS vehicles.

• Provide the policy and how to file a complaint in our SCSS brochures.

**Access Procedure for Person with Limited English Proficiency:** According to Bureau of Census, US Department of Commerce, in 2010 only 2 percent of Skamania County's population spoke English less than "very well" and only 5.7 percent of the population spoke a language other than English. SCSS does not prepare our written materials in other languages.

**Factor 1 of the Four-Factor Analysis: Access Procedure for Person with Limited**

**English Proficiency:** According to Bureau of Census, US Department of Commerce, in

2010 only 2 percent of Skamania County's population spoke English less than "very well" and only 5.7 percent of the population spoke a language other than English.

**Factor 2:** Frequency of Requests: There is a very small amount of people with Limited English proficiency that access dial a ride or deviated fixed route services. Currently, we have less than 10 individuals that we serve.

**Factor 3:** SCSS Programs can provide necessary medical transportation to individuals with

Limited English Proficiency.

**Factor 4:** LEP persons services: Clients in need of medical services would be referred to One Community Health in Hood River, OR for services. The Washington State Health Care Authority currently has a community services worker and translator in our office who

can serve those who need information. SCSS has a bilingual driver that can be assigned to

assist LEP clients who speak Spanish. We can offer Human Services Council Medicaid transportation brochures in Spanish.

Skamania County Senior Services uses the Language Line to communicate with non­ English speaking persons seeking services, assistance or information from Skamania County. The access number is 1-800-752-6096.

**Complaint Procedures**

a. *Overview:* These procedures cover all complaints filed under Title VI of the Civil Rights

Act of 1964, as amended and Civil Rights Restoration Act of 1987 relating to any program

or activity administered by SCSS, as well as to sub-recipients, consultants, and contractors. Law prohibits intimidation or retaliation of any kind for filing or pursuing a complaint.

These procedures do not deny the right of the complainant to file formal complaints with other state or federal agencies or to seek private counsel for complaints alleging discrimination. The option of informal mediation meeting(s) between the affected parties and a designated mediator may be utilized for resolution.

a. *Procedures*

4. Any individual, group of individuals, or entity that believes they have been subjected to discrimination prohibited by nondiscrimination requirements of this policy may file a written complaint with the Skamania County Board of

Commissioners, P.O. Box 790, Stevenson, WA 98648. A formal complaint must be filed within 180 days of the alleged occurrence. Skamania County will not officially act or respond to complaints made verbally.

5. Upon receipt of a written complaint, the Board will determine its jurisdiction, need for additional information, and the investigative merit of the complaint. In some situations, the Board of Commissioners may forward the complaint directly to the Office of Equal Opportunity of the appropriate program funding agency. The funding agency shall follow its adopted procedures for investigating discrimination complaints.

6. The Board shall notify SCSS of the complaint against SCSS so that SCSS Title VI

Coordinator can log the complaint. The SCSS Title VI Coordinator must maintain

an annual *Log of Complaints* regarding SCSS for both Title VI complaints and ADA complaints or denial of services. The log shall contain the following information for each complaint filed:

i. The name and address of the person filing the complaint.

ii. The date of the complaint

iii. The basis of the complaint (race, color, national origin, handicap/ disability, age or sex).

iv. The disposition of the complaint

7. Upon completion of the investigation, both the complainant and SCSS shall receive a copy of the report.

8. If the complainant or respondent is not satisfied with the results of the investigation and determination of the Board of Commissioners, either may appeal the decision to the state and/or federal program funding agency or the U.S. Department of Justice. Such appeal must be submitted within 180 days after the appropriate agency's final resolution. Unless new fact not previously considered come to light, reconsideration of the final determination by the investigating agency will not be available.