

Title VI Plan

January 2018-2021

Title VI Plan Table of Contents

Integral Care's Title VI Plan includes the following elements:

1.	Title VI Plan Approval and Revision Log	Page 3
2.	Description of Organization and Service Provided	3
3.	Title VI Policy Statement	4
4.	Title VI Notice to the Public	5
5.	Title VI Complaint Procedure	6
6.	Title VI Complaint Form	8
7.	List of Transit-Related Title VI Investigations, Complaints and Lawsuits	10
8.	Public Participation Plan	11
9.	Language Assistance Plan	13
10.	. Minority Representation Information	21
11.	. Providing Assistance to and Monitoring Subrecipients	21
	Attachment A: Notice to the Public (Spanish version)	
	Attachment B: Complaint Procedure (Spanish version)	23
	Attachment C: Complaint Form (Spanish version)	25
	Title VI Plan January 2018-2021 Adopted on:	
	Adopted by: Integral Care Board of Trustees	
	Signature(s): Hal Katz, Board Chairman	
	David Evans Chief Executive Officer	

Section 1: Title VI Plan Approval and Revision Log

Title VI Plan Revision Log

Date Month/day/year	Section Revised	Summary of Revisions

Section 2: Description of Organization and Service Provided

Integral Care serves as a local authority and service provider for services in Travis County, Texas. Services include Early Childhood Intervention, Intellectual and Developmental Disability, and Behavioral Health Services (including but not limited to Counseling Services, Suicide Prevention, Medical Services, Crisis Services, Drug and Alcohol Treatment).

Integral Care has committed to assisting individuals with their transportation needs by offering local transportation options that include accessibility to fixed route services, transportation vouchers for local transport, and door to door transport when appropriate. Transportation assistance is coordinated at an agency and case manager level across Travis County.

Transportation Staff Includes:

- Fleet Manager
- Fleet Technician

Integral Care does not currently use any of its fleet vehicles for revenue producing transportation.

Section 3: Title VI Policy Statement

Policy Statement

Integral Care as a recipient of Federal Transit Administration (FTA) grant dollars either directly from FTA or through the Texas Department of Transportation (TxDOT), will comply with the Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), the U.S. Department of Transportation implementing regulations, FTA Circular 4702.1B, and TxDOT PTN requirements as specified in Master Grant Agreement, and State Management Plan.

Section 4: Title VI Notice to the Public

Integral Care's Notice to the Public is posted in the following locations: (check all boxes for Required)

Required:
☑ Agency website
☑ Public areas of the agency's office
☑ Reception desk
☑ Notice at stations or stops and or inside transit vehicles
Optional:
☐ Rider Guides/Schedules
☐ Other

Notifying the Public of Rights Under Title VI Integral Care

- ✓ Integral Care operates its programs and services 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 Integral Care.
- ✓ For more information on Integral Care's Ombudsman's Office, to obtain the procedures to file a complaint, or for information on how to file a complaint contact our Ombudsman at 512-440-4086, feedback@integralcare.org, or contact the HHSC Civil Rights Office at 1-800-735-2982.
- ✓ A complaint may also be filed directly with the: Texas Department of Transportation, Attn: TxDOT-PTN, 125 E. 11th Street, Austin, TX 78701-2483, 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.
- ✓ If information is needed in another language, contact our Ombudsman at 512-440-4086, or feedback@integralcare.org

Si necesita información en otro idioma contacte 512-440-4086 feedback@integralcare.org

Section 5: Title VI Complaint Procedure

*See Attachment A for Spanish version

Integral Care's Title	VI Complaint Proced	dure is made av	ailable in the	following	locations:	(check	box]	for
Required)								
Required:								
□ Agency website	e: www.integralcar	e.org/feedback						
Optional:								
☐ Public office								
☐ Reception are	as							
\square Meeting room	S							

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by Integral Care may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form. Complaint forms can be found at: www.integralcare.org/feedback

Available in appropriate languages for LEP populations, meeting the Safe Harbor Threshold

Integral Care investigates complaints received no more than 180 days after the alleged incident. Integral Care will process complaints that are complete.

Once the complaint is received, Integral Care will review it to determine if it has jurisdiction. (A copy of each Title VI complaint received will be forwarded to TxDOT Public Transportation Coordinator within ten (10) calendar days of receipt.) The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office.

Integral Care has 30 business days to investigate the complaint. If more information is needed to resolve the case, Integral Care may contact the complainant.

The complainant has 3 business days from the date of the letter to send requested information to the investigator assigned to the case.

If the investigator is not contacted by the complainant or does not receive the additional information within 3 business days, Integral Care can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue the case.

After the investigator reviews the complaint, she/he will issue one of two (2) letters to the complainant: a closure letter or a letter of finding (LOF).

- ✓ A <u>closure letter</u> summarizes the allegations and states that there was not a Title VI violation and that the case will be closed.
- ✓ A <u>letter of finding (LOF)</u> summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member, or other action will occur.

If the complainant wishes to appeal the decision, she/he has 5 days after the date of the closure letter or the LOF to do so.

A person may also file a complaint directly with the: Texas Department of Transportation, Attn: TxDOT-PTN, 125 E. 11th Street, Austin, TX 78701-2483, *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.

✓ If information is needed in another language, please contact the Ombudsman at 512-440-4086 or feedback@integralcare.org.

*See Attachment B for Spanish version

Section 6: Title VI Complaint Form

Integral Care's Title VI Complaint Form is made available in the following locations: (check box for Required)

Required: Agency website: www Hard copy in the centre	al office			
	e languages for LEP pop	oulations meeting 	g the Safe Harbo	or Threshold
Section I:				
Name:				
Address:				
Telephone (Home):		Telephor	ne (Work):	
Email Address:				
Accessible Format	Large Print		Audio Tape	
Requirements?	TDD		Other	
Section II:				
Are you filing this complaint	on your own behalf?		Yes*	No
*If you answered "yes" to thi	s question, go to Secti	on III.		
If not, please supply the nam whom you are complaining:	e and relationship of t	he person for		
Please explain why you have	filed for a third party:			
Please confirm that you have aggrieved party if you are fili	·		Yes	No
Section III:				
I believe the discrimination I	experienced was base	d on (check all t	hat apply):	
[] Race [] Color [] National Origin				
Date of Alleged Discrimination (Month, Day, Year):				
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.				

Section IV			
Have you previously filed a Title VI complaint with the	is agency?	Yes	No
Section V			
Have you filed this complaint with any other Federal, court?	State, or local a	gency, or with an	y Federal or State
[] Yes [] No			
If yes, check all that apply:			
[] Federal Agency:			
[] Federal Court	[] State Age	псу	
[] State Court	[] Local Age	псу	
Please provide information about a contact person at	t the agency/cou	ırt where the con	nplaint was filed.
Name:			
Title:			
Agency:			
Address:			
Telephone:			
Section VI			
Name of agency complaint is against:			
Contact person:			
Title:			
Telephone number:			
You may attach any written materials or other informa	ation that you th	ink is relevant to	your complaint.
Signature and date required below:			
Signature	Date		
If information is needed in another language,	contact the On	nbudsman at 51	2-440-4016 or

feedback@integralcare.org

Please submit this form in person at the address below, or mail this form to:

Integral Care
Ombudsman Office
1430 Collier St.
Austin, Texas 78704

*See Attachment C for Spanish version

Section 7: List of Transit-Related Title VI Investigations, Complaints and Lawsuits

Check One:

Integral Care maintains a list or log of all Title VI investigations, complaints and lawsuits, pertaining to its transit-related activities.

Х	There have been <u>no</u> investigations, complaint and/or lawsuits filed against us since the last plan submission.
	There have been investigations, complaints and/or lawsuits filed against us. See list below. Attach additional information as needed.

	Date (Month, Day, Year)	Summary (include basis of complaint: race, color, or national origin)	Status	Action(s) Taken
Investigations				
1.				
Lawsuits				
1.				
Complaints				
1.				

Section 8: Public Participation Plan

Strategies and Desired Outcomes

To promote inclusive public participation, Integral Care will employ the following strategies, as appropriate (make these determinations based on a demographic analysis of the population(s) affected, type of plan, program and/or service under consideration, and the resources available):

- ✓ Provide for early, frequent and continuous engagement by the public.
- ✓ Select accessible and varied meeting locations and times
- ✓ Employ different meeting sizes and formats
- ✓ Provide childcare and food during meetings, if possible.
- ✓ Use social media in addition to other resources as a way to gain public involvement
- ✓ Use radio, television or newspaper ads on stations and in publications that serve LEP populations. Outreach to LEP populations may also include audio programming available on podcasts.
- ✓ Expand traditional outreach methods by visiting ethnic stores/markets and restaurants, community centers, libraries, faith-based institutions, local festivals, etc.

Public Outreach Activities

Below is a list of annual Public Events. Local events are posted in clinics in the event service area and all events are posted on social media which can be accessed via Facebook, Twitter and our website.

Month of Event	Name of Event
May	South Texas Family
	Support Conference
August	Austin ISD Back to School
	Bash
August	Manor ISD Back to School
September	NAMI Walk
October	Deaf Culture Workshop
October	Austin Community College
	Spirit Day
October	Pride Festival
October	AIDS Walk
	Austin Clubhouse
October	Resource Fair
	Community Forum on
	Mental Illness – Largo
	Vista Performing Arts
October	Center
	Annual Palm Square
October	Resource Fair

Month of Event	Name of Event
	Del Valle Middle School –
October	Back to School Night
	Raegan High School –
October	Hope Fest
October	
	Out of the Darkness Walk
	Asian American Resource
November	Center Open House
	Pop-Up Resource Fair at
November	Central Health
	Listening Session on Youth
November	Substance Use & Recovery
November	Inclusive Language
	Workshop
November	Care for Culture Online
	Module
November	New Milestones Gala
February	African American Family
	Support Conference
May	Children's Mental Health
	Day Awareness
Weekly	Youth Mental Health First
	Aid
Weekly	Adult Mental Health First
	Aid
Weekly	Adult Mental Health First
	Aid (Spanish language)
Quarterly	Community Education
	Forums
Quarterly	Intersection of Gender
	and Sexuality Workshop
Quarterly	Care for Culture 2-day
	Session
Annually	ACC, Huston-Tillotson, UT
	Community Resource Fairs
Annually	Family Resource Fairs at
	Austin ISD High Schools
Annually	Austin Energy Community
	Connects
As	Suicide Prevention
requested/invited	Workshop

Section 9: Language Assistance Plan

Language Access Plan Components

As a recipient of federal US DOT funding and consistent with Title VI of the Civil Rights Act of 1964 and Executive Order 13166, Integral Care is required to take reasonable steps to ensure meaningful access to our programs and activities by Limited-English proficient (LEP) persons. Integral Care's Individualized Language Access Plan involves elements listed under the Four Factor Analysis including:

- 1) The number or proportion of LEP persons eligible to be served or likely to be encountered by the program recipient.
 - a. LEP persons interact with the agency through various ways including: in person, phone, and internet.
 - b. Identification/Assessment of the number or proportion of LEP persons: The top languages accessed through Integral Care's interpreting services by current Integral Care consumers are: Spanish (75%), Vietnamese (9.8%), Arabic (7.0%), Nepali (2.5%), Mandarin (1.5%), and Burmese (1.4%). Other languages accessed at < 1% include: Kinyarwanda, Italian, Farsi, Swahili, Thai, Hindi, Hungarian, Somali, Korean, French, Japanese, Tagalog, Amharic, and Pashto. Integral Care also employs American Sign Language interpreters and maintains access to Video Relay services to help individuals that are deaf and hard of hearing.
 - c. Literacy level: Integral Care complies with the Plain Writing Act of 2010
 - d. Integral Care continuously provides outreach to communities identified as underserved regardless of reason.
- 2) The frequency with which LEP persons come into contact with the program.
 - a. LEP persons use bus and Medicaid transportation regularly.
 - b. LEP persons purchase and use tickets through public transportation services as well as obtain tickets through Integral Care staff when clinically appropriate.
 - c. Participation in public meetings is open to all, including LEP persons. Interpreters are available at no charge to the individual.
 - d. LEP persons have access to all agency services through interpreters by calling the agency's main number to address any needs including crisis, appointments, complaints, and general questions.
 - e. LEP persons are able to access applicable agency surveys in their language or through the assistance of bilingual staff or a qualified interpreter.
 - f. LEP persons are able to access applicable agency surveys in their language or through the assistance of bilingual staff or a qualified interpreter.
- 3) The nature and importance of the program, activity, or service provided by the program to people's lives.
 - a. Integral Care's Language Access Plan addresses meaningful access to all vital services through various means including:
 - Access to crisis, scheduling, general questions, screening requests, information about community resources, billing, and complaints through the agency's call center.

- ii. Trained and competent workforce that is able to access language assistance services when a bilingual employee is not readily available. This includes staff assisting with scheduling transportation needs when clinically indicated.
- iii. Vital Documents are translated and available
- 4) The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach.
 - a. Integral Care posts the Notification of Nondiscrimination in 15 languages at all locations and on the internet. This notice includes information about free aids and services that are free of charge including language services. Full notice is included under the "Results of Four Factor Analysis" below.

Results of the Four Factor Analysis:

A) Description of the LEP population(s) served;

The top languages accessed through Integral Care's interpreting services by current Integral Care consumers are: Spanish (75%), Vietnamese (9.8%), Arabic (7.0%), Nepali (2.5%), Mandarin (1.5%), and Burmese (1.4%). Other languages accessed at < 1% include: Kinyarwanda, Italian, Farsi, Swahili, Thai, Hindi, Hungarian, Somali, Korean, French, Japanese, Tagalog, Amharic, and Pashto. Integral Care also employs American Sign Language interpreters and maintains access to Video Relay services to help individuals that are deaf and hard of hearing.

B) Describe how the recipient provides language assistance services by language

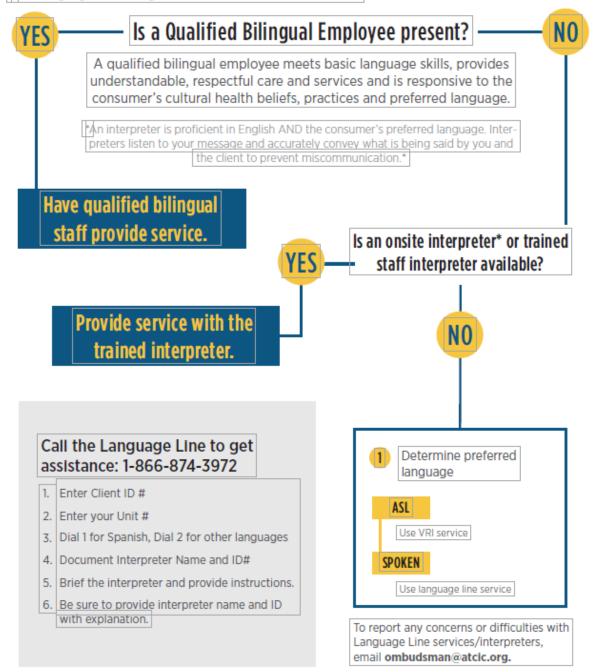
Employees are receive training and guidelines to assist LEP persons (flow chart included below).

All clinical staff have access to a language identification cards that can assist in identifying what language an individual is speaking (identification card included below).



*

*See Language Access Page on Intranet for additional resources.



Your Right to an Interpreter

You have the right to an interpreter at no cost to you. Please point to your language. An interpreter will be called. Please wait.

to your rainguage. An interpreser will be carried. Please wall.				
Abenian Shqip Keni të drejtën për përkthyes falas gjatë vizitës mjeksore. Ju lutem tregoni me gjisht gjuhën që filishi. Ju lutem prishi, do tju gjejmë një përkthyes për viziten mjekësore.	Ambert አማርኛ ፡፡ ያለምንም ወጪ አስተርጓሚ የማካኝት መብት አሰቃት፡፡ የሚናንፋትንና የሚይጹትን ቋንቋ በመሰቆም ያመልከቱ። አስትርጓሚ አስኪብል ጽሪስ አባክዎ ይታገሱ።	Arable حور بيدي بعل الله العمول على هندات الرجمة فورية دون أي مقابل. الرجم مناه أن الامرية بالمساه الى المقاص المارجم المحلى بأرجم مناه الإنتظار العن استدهاء المارجم.	Armenian Zայերեն Դուր իրավունը ուներ առանց որեծ վմարի թարգմանիլ, ունենալ: նեղրում ենը մատնանվեր ձեր լեզում և ձեր համար թարգմանիլ կկանչենը: ձեղրում ենց սպասեր	
aengel/ বাংলা আবদার অধিকার রয়েবে বিমাদুল্যে একডাম আবদার অধিকার রাজ্যুম করে আবদার ভাবা কোমটি তা পেথিয়ে বিমা একডাম পোডার্থাকে ভাবা হবে।অসুমুম করে আবদার করম।	Cage Verdeen Create Criolu di Cabu Verdi Nhôs tem direito g um interprete gratutto di nhôs lingua. Mostra qual qui nhôs lingua pa nô podi tchoma interprete. Nhôs aguarda um momento, por favor.	Chinese - Simplified 中文 「大き」 第4 648 688,0688 584 作者权利要求一位免责的传译员。 请据出你的语言。传译员将为你服务。 请稍偿。	Chinasa - Traditional 中文 東於 西年 砂路 砂珠電路 西年 你有權利要求一位免責的傳導員。請指出 你的語言。傳導員將為你服務,調酬候。	
سه فرری شما هق دارید که یک مترجد داشته باشید پدرن شکه برای بایت آن بدهید لطفا به زیان قرد اشاره طلب یک مترجم برایتان در فراست خراهد شد لطفا منتظر بماید	Français Vous avez droit gratuitement aux services d'un interprête. Veuillez indiquer votre langue. Nous allons contacter un interprête. Veuillez patienter si'il vous plait! :	Deutsch Sie haben Kostenlosen Anspruch auf eine/n Dolmetscher/in. Bittle deuten Sie auf Ihre Sprache. Ein/e Dolmetscher/in wird gerufen. Bittle warten Sie.	Greek Ελληνικά Ελληνικά Είναι θικοίωμό σος να χρησιμοποιήσετε διερμηνία χωρίς καμία χρημοτικοί επιβάρυνας. Σας παρακελούς, υποδείζει πη γλώσο που μίλάτε. Θα ειθοποιήσουμε ένα θιαρμηνέα. Παρακολώ περιμένετε.	
Metter Create Kreyòl Ayisyen Ou gen dwa a yon entèprèt grafis. Tanpri montre nou lang pa w la. N ap rèle yon entèprèt pou ou. Tanpri ret tann.	שימות עברית יש לך את הזכות למתורגמן ללא כל פלות לך. אנא הצבע פל השפה שלך. המתורגמן ייקרא, אנא המתן.	सात्रशं □ हिंदी आपको तिना कोई शुरुक दिए दुसारिया सेटा याने का अधिकार है। कृपया अपनी साथा की इंगित करें। दुसारिया की दुसाया जादगा। कृपया समीका करें। □	Hmoob Koj muaj cal txals kev pab txhals lus dawb tsis them nylaj. Thoy taw tes rau koj hom lus nov. Mam hu tus txhals lus. Thoy nyob tos.	
Italiano Avete diritto ad un interprete. Il servizio è gratulto. Indicate la vostra lingua e attendete; un interprete sarà chiamato al più presto.	本のののでは、日本書名 日本書名 日本書名 日本書名 通訳を無料でご利用になれます。 該当する言語を指示して下さい。 通訳を手配いたしますのでお待ち下さい。	កាត់ មិន្នីរំ មានស្ថិត មានស្ថិត្តបានក្រាមការបានកាត់កាំខ្មា មួយមត្តិបានការបានសកម្មកា គេនឹងការ នៅពីស្ថិតបកប្រែដ្ឋាភិបក។ សូមមត្តាស់លាំ៖	Morean 인 이 이 이 이 이 이 이 이 이 이 이 이 이 이 이 이 이 이	

Lection ລາວ ທ່ານມີລົດຂໍນາຍແປພາລາໃດຍປະລັງຄຳ. ກະຊຸນາຊີໃສ່ພາສາຂອງທ່ານ, າຍພາສາຈະຖືກເຮັບມາ. ກະຊຸນາລັຖ້າ.	Perzian فار سمی شماحق دارید که یک مترجم داشته باشید بدون آنکه پولی بابت آن بدهد. اطفأه به زبان خود اشار، کلید. یک مترجم برایتان درخواست خواهد شد. اطفأه منتظر بسانید.	Pedun□ Język Polski□ Masz prawo do korzystania z usług polskiego tłumacza. Usługa ta jest na nasz koszt. Proszę wskazać swój język. Proszę czekać. Lączymy z tłumaczem.□	Português Você tem o direito a um intérprete de graça. Por favor aponte para a língua que você fala. Um intérprete será chamado. Por favor espere.
явазию □ Русский □ вы мичете право на услуги беоплатного переводчика. Укажите, пожалуйста, на Ваш явык. Переводчик будет вызван. Пожалуйста, подождите. □	Serbe-Creation Srpsko-Hrvatski jezik Vi imate pravo na bespitaro prevodioca. Molimo vas da pokažete na vaš govomi jezik. Prevodilac ce biti pozvan. Hvata i molimo vas da sačekate.	Soomaali :: Waxaad xaq u leedahay in tarjumaan lacag la'aan ah laguugu yeero. Fadlan farta ku fiiq luqaddaada. Tarjumaan ayaa laguugu wacayaa. Ee fadlan sug!	Español Listed tiene derecho a un intérprete gratis. Por favor, señale su idioma y ilamaremos a un intérprete. Por favor, espere.
Swahili Ni haki yako kuwa na mtafsiri bila malipo yoyote. Tafadhali chagua lugha yako kati ya hizi. Mtafsiri ataitwa. Tafadhali ngoja.	Tagalog □ Ikaw ay may karapatan na magkaroon ng tagapagsalin na walang bayad. Ituro ang lyong wika. Ang tagapagsalin ay tatawagin. Maghintay.	70ค/ ไทย ท่านอิทเลิขอย่ายแปอภาษาโดยไม่เลิยต่าใช้อ่ายใ ดๆ กลุณาอิทีเภณาของท่าน กลุณาลอดักอยู่ เลาออิทเลอัพท์เลียกต่ายให้ท่าน	Окекпівл □ Україньска□ У Вас є право на безплатного перекладача. Будь ласка, вкажіть на Вашу мову, і Вам покличуть перекладача. Почекайте, будь ласка.□
ساس اردق آپ مفت ترجمانی کی خدمات کے مستحق بین براہ کرم اپنی زبان کی طرف اشارہ کیجئے۔ آپ کے نئے ایک ترجمان کا انتظام	Tiếng Việt Quý vị có quyền được một thông dịch viên miền phí. Xin chí vào ngôn ngô- của quý vị. Chúng tôi sẽ gọi một thông dịch viện. Vul lò na cho trong diáy lật.		

C) <u>Describe how the recipient provides notice to LEP persons about the availability of language assistance;</u>

Integral Care provides a Notification of Nondiscrimination at intake and posts the following information in 15 languages at all locations as well as on the internet:

Integral Care complies with applicable Federal civil rights laws and does not discriminate on the basis of race, color, national origin, age, disability, or sex. Integral Care does not exclude people or treat them differently because of race, color, national origin, age, disability, or sex.

Integral Care:

- Provides free aids and services to people with disabilities to communicate effectively with us, such as:
- Qualified sign language interpreters
- Written information in other formats (large print, audio, accessible electronic formats, other formats)
- Provides free language services to people whose primary language is not English, such as:
- Qualified interpreters
- Information written in other languages

If you believe that Integral Care has failed to provide these services or discriminated in another way on the basis of race, color, national origin, age, disability, or sex, you can file a grievance with: Phyllis Wolf, 1430 Collier St., Austin, Texas 78704, 512-440-4086, TTY number 512-703-1395, Fax 512-445-7745, Feedback@integralcare.org. You can file a grievance in person or by mail, fax, or email. If you need help filing a grievance, Phyllis Wolf is available to help you.

You can also file a civil rights complaint with the U.S. Department of Health and Human Services, Office for Civil Rights, electronically through the Office for Civil Rights

Complaint Portal, available at https://ocrportal.hhs.gov/ocr/portal/lobby.jsf, or by mail or phone at:

U.S. Department of Health and Human Services

200 Independence Avenue, SW

Room 509F, HHH Building

Washington, D.C. 20201

1-800-368-1019, 800-537-7697 (TDD)

Complaint forms are available at http://www.hhs.gov/ocr/office/file/index.html.

D) Describe how the recipient monitors, evaluates and updates the language access plan

Program Managers and Directors receive real-time feedback from employees and LEP persons. If issues are identified, immediate action is taken to correct in order to minimize impact and language access

services are adjusted accordingly. Call Center, Language Line, and Accounts Payable regularly send out reports on usage for review. The Language Access Plan is updated when findings indicate need.

E) Describe how the recipient trains employees to provide timely and reasonable language assistance to LEP populations.

Current trainings occur at the unit levels and include an overview of Language Access and the Law, accreditation standards and competence requirements, how to assist individuals of LEP, how to access language assistance services when appropriate, and how to use the language identification guide. A web-based training for all staff is in the final stages of development and will be available as supplemental training.

Language Access Plan – Integral Care FY17

Integral Care's Language Access Plan addresses the following strategic plan goal and objectives:

Goal# 2: Improved health outcomes are achieved through implementation of high quality services and continuous innovation.

Objective 2.1: Increase access to services.

Objective 2.2: Make available evidence-based services and promising practices that meet or exceed industry standards.

This plan establishes a strategy for ensuring meaningful access by individuals with Limited English Proficiency (LEP) to all programs and activities offered by Integral Care in accordance with Executive Order 13166 (EO 13166), *Improving Access to Services For Persons With Limited English Proficiency*, issued August 11, 2000. Integral Care's language access plan and policy is aligned with HHS Language Access Policy and Implementation recommendations (2013).

Goal: Integral Care (Integral Care) provides access to timely, quality language assistance services to individuals with Limited English Proficiency (LEP) at all points of contact.

Demographic Information: The top languages accessed through Integral Care's interpreting services by current Integral Care consumers are: Spanish (75%), Vietnamese (9.8%), Arabic (7.0%), Nepali (2.5%), Mandarin (1.5%), and Burmese (1.4%). Other languages accessed at < 1% include: Kinyarwanda, Italian, Farsi, Swahili, Thai, Hindi, Hungarian, Somali, Korean, French, Japanese, Tagalog, Amharic, and Pashto. Integral Care also employs American Sign Language interpreters and maintains access to Video Relay services to help individuals that are deaf and hard of hearing.

The most commonly spoken languages in Integral Care's catchment area (2010-2014) are noted below:

Travis County	Number of Speakers	Number Who Speak English Less Than "Very Well"	
Spanish	245,480	110,186	
Vietnamese	11,916	6,871	
Chinese	10,966	3,900	
Other Asian Languages	6,602	1,185	
Korean	4,523	1,608	
French	4,396	780	
Hindi	4,136	738	
German	3,052	222	
Urdu	3,091	870	
Arabic	3,071	1,344	
Other Indic Languages	2,455	468	

Source: http://www.cancommunitydashboard.org/demographic-overview.php; U.S. Census Bureau, American Community Survey, 2009-2014 5-year estimates, B16001: Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over.

Element 1: Needs and Capacity

Action: Integral Care will have in place processes to regularly identify and assess the language assistance needs of its current and potential clients, as well as processes to assess the agency's capacity to meet these needs according to the elements of this plan.

Responsible Unit: Quality Management will be responsible for conducting annual assessments and implementing and/or improving language assistance based on assessed needs.

Element 2: Oral Language Assistance Services

Action: Integral Care will provide oral language assistance, in both face-to-face and telephone encounters, through the use of qualified bilingual staff and qualified interpreters at no cost to individuals with LEP. Integral Care will establish a point of contact for individuals with LEP, such as an office, official, or phone number. Integral Care will ensure that all bilingual staff and interpreters pass a basic language competency test prior to providing services. This test will be based on the Texas Advisory Committee On Qualifications for Health Care Translators and Interpreter Recommendations, 2013, the following Joint Commission Standards: HR.01.02.01, PC.02.01.21, RI.01.01.01, RI.01.01.03, and the ACA Recommendations.

Responsible Unit: Human Resources and Ombudsman

Element 3: Written Translations

Action: Integral Care will identify, translate and make accessible in various formats, including print and electronic media, vital documents in languages other than English in accordance with assessments of needs and capacity conducted under Element 1.

Responsible Unit: Communications, Medical Records, Program Operations will define a process and will work with certified translators and external stakeholders to provide written translations that comply with the Plain Writing Act of 2010.

Element 4: Policies and Procedures

Action: Integral Care will develop, implement and regularly update written policies and procedures that ensure that individuals with LEP have meaningful access to agency programs and activities.

Responsible Unit: Executive Management Team (EMT)

Element 5: Notification of the Availability of Language Assistance at No Cost

Action: Integral Care, in accordance with agency needs and capacity and in plain language, will proactively inform individuals with LEP that language assistance is available at no cost.

Responsible Unit: Communications Department

Element 6: Staff Training

Action: Integral Care will commit resources and provide employee training as necessary to ensure that management and staff understand and can implement LEP policies and procedures and the elements of the Language Access Plan.

Responsible Unit: Human Resources and designated manager

Element 7: Assessment: Access and Quality

Action: Integral Care will regularly assess the accessibility and quality of language assistance activities for individuals with LEP, maintain an accurate record of language assistance services, and implement or improve LEP outreach programs and activities in accordance with customer need and agency capacity.

Responsible Unit: Quality Management

ELEMENT 8: Stakeholder Consultation

Action: Integral Care will consult with stakeholder communities to identify language assistance needs of individuals with LEP, implement appropriate language access strategies to ensure individuals with LEP have meaningful access in accordance with assessments of need and agency capacity, and evaluate progress on an ongoing basis.

Responsible Unit: Communications Department

ELEMENT 9: Digital Information

Action: Integral Care will develop and implement specific written policies and procedures to ensure that, in accordance with assessments of LEP needs and agency capacity, digital information is accessible by communities in need of language services.

Responsible Unit: Communications Department

ELEMENT 10: Provider Assurance and Compliance

Action: Integral Care will ensure that Contracted Providers understand and comply with obligations under civil rights statutes and regulations.

Responsible Unit: Provider Network and Authority Officer

Section 10: Minority Representation Information

• We do not have transit related non-elected Board Members.

Efforts to Encourage Minority Participation

• There are no non-elected transit-related boards, committees, or councils.

Section 11: Providing Assistance to and Monitoring Subrecipients

Integral Care does not provide funding to subrecipients.

Title VI Program Attachment A Notice to the Public (Spanish version)

Notificar al público de los derechos bajo Title VI Integral Care

- ✓ Integral Care opera sus 'programas y servicios sin importar raza, color y origen nacional según el título VI de la ley de derechos civiles. Cualquier persona que cree que él o ella ha sido agraviado por cualquier práctica discriminatoria ilegal bajo el título VI puede presentar una queja con Integral Care.
- ✓ Para mayor información sobre la oficina de Ombudsman de Integral Care, obtener los procedimientos para presentar una queja, o para obtener mas information en como hacer una queja puede contactar el Ombudsman al 512-440-4086 feedback@integralcare.org; o comuníquese con la oficina de derechos civiles de la HHSC en 1-800-735-2982.
- ✓ También puede presentar una queja directamente con la: Texas Department of Transportation, Attn: TxDOT-PTN, 125 E. 11th Street, Austin, TX 78701-2483, 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.
- ✓ Si necesita información en otro idioma, comuníquese con nuestro Ombudsman 512-440-4086 or feedback@integralcare.org.

Title VI Program Attachment B Complaint Procedure (Spanish version)

PROPÓSITO: Establecer un procedimiento relativo al derecho de una persona a presentar una queja bajo el Título VI.

Integral Care el procedimiento de reclamación del Título VI está disponible en los siguientes lugares:

Necesario: ☑ Sitio web de la agencia: www.integralcare.org/feedback
Opcional:
☐ Oficina pública
☐ Zonas de recepción
☐ Salas de reunión
☐ Disponible en los idiomas apropiados para las poblaciones de LEP, cumpliendo con el Umbral de Puerto Seguro
□ Otro:

Cualquier persona que crea que ha sido discriminado por raza, color o origen nacional por Integral Care puede presentar una queja de Título VI completando y presentando el Formulario de Queja de Título VI de la agencia. Los formularios de quejas pueden encontrarse en:

www.integralcare.org/feedback or feedback@integralcare.org

Integral Care investiga las quejas recibidas no más de 180 días después del presunto incidente. Integral Care tramitará las quejas que están completos.

Una vez recibida la queja, Integral Care la revisará para determinar si nuestra oficina tiene jurisdicción. (Se enviará una copia de cada denuncia de Título VI recibida al Coordinador de Transporte Público de TxDOT dentro de los diez (10) días calendario de haberla recibido). El demandante recibirá una carta de reconocimiento informándole si la queja será investigada por nuestra oficina.

Integral Care tiene 30 días hábiles para investigar la queja. Si se necesita más información para resolver el caso, Integral Care puede contactar al demandante.

El denunciante tiene 3 días hábiles desde la fecha de la carta para enviar la información solicitada al investigador asignado al caso.

Si el investigador no es contactado por el demandante o no recibe la información adicional dentro de los 3 días hábiles, Integral Care puede cerrar administrativamente el caso. Un caso puede ser administrativamente cerrado también si el demandante ya no desea seguir su caso.

Después de que el investigador revise la queja, emitirá una de las dos (2) cartas al demandante: una carta de cierre o una carta de hallazgo (LOF).

- Una <u>carta de cierre</u> resume las alegaciones e indica que no hubo una violación del Título VI y que el caso será cerrado.
- Una carta de hallazgo (LOF) resume las alegaciones y las entrevistas con respecto al supuesto incidente, y explica si ocurrirá alguna acción disciplinaria, entrenamiento adicional del miembro del personal u otra acción.

Si el querellante desea apelar la decisión, tiene 5 días después de la fecha de la carta o del LOF para hacerlo.

Una persona también puede presentar una queja directamente con: Departamento de Transporte de Texas, a la atención de:

TxDOT-PTN, 125 E. 11th Street, Austin, TX 78701-2483, *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.

• Si se necesita información en otro idioma, comuníquese con un Oficial de Protección de Derechos al512-244-8324.

Title VI Program Attachment C Complaint Form (Spanish version)

Sección I						
Nombre:						
Dirección:						
Teléfono (Casa):		Teléfono (Trabajo):				
Dirección de correo electrónico:						
¿Requisitos accesibles?	Formato Impresión grande		Cinta de audio			
	TDD		Otro			
Sección II						
¿Está presentando esta queja		Sí 🗆	No 🗆			
* Si contestó "sí" a esta pregunta, vaya a la Sección III.						
Si no es así, proporcione el nombre y la relación de la persona por la que se queja:						
Explique por qué ha presentado un tercero:						
Si usted está archivando en nombre de un tercero, ¿ha o el permiso de la parte agraviada?			Sí 🗆	No 🗆		
Sección III						
Sección IV						
¿Ha presentado previamente agencia?	on esta	Sí 🗆	No 🗆			
Sección V						
¿Ha presentado esta queja ante cualquier otra agencia federal, estatal o local, o ante cualquier tribunal federal o estatal? Sí \Box No \Box						
En caso afirmativo, marque todas las que correspondan:						
☐ Agencia Federal:						
☐ Corte federal:		☐ Agencia del estado:				
□ Tribunal del Estado:		☐ Agencia local:				

Proporcione información sobre una persona de contacto en la agencia/tribunal donde se presentó la queja.
Nombre:
Título:
Agencia:
Dirección:
Número de teléfono:
Sección VI
El nombre de la queja de la agencia está en contra:
Persona de contacto:
Título:
Número de teléfono:
Usted puede adjuntar cualquier material escrito u otra información que considere pertinente a su queja.
Firma y fecha se requiere a continuación.
Firma Fecha
Si se necesita información en otro idioma, comuníquese con un Ombudsman al 512-440-4086.

Por favor envíe este formulario en persona a la dirección abajo, o envíe este formulario a:

Integral Care Ombudsman's Office 1430 Collier St. Austin, Texas 78704

feedback@integralcare.org