



REAL SERVICES, INC.

Title VI Plan

(As a sub recipient under the Older Americans Act, Indiana Housing and Community Development and Federal Transit Administration (FTA 5310)

Adopted March 2023 by REAL Services Board of Directors

Introduction and Applicability: REAL Services, believing in the dignity of all people, seeks to provide equitable service for participants of its programs and customers of its services. As required by various sub-recipient agreements, REAL Services incorporates nondiscrimination policies and practices in providing services to the public. As a sub-recipient of federal funds, REAL Services is required to conform to Title VI of the Civil Rights Act of 1964 (Title VI) and all related statutes, regulations, and directives, which provide that no person shall be excluded from participation in, denied benefits of, or subjected to discrimination under any program or activity receiving federal financial assistance. This plan will be updated periodically (at least every three years) to incorporate changes and additional responsibilities that arise.

This policy meets guidelines of the Older Americans Act, IN Housing and Community Development Authority and the Federal Transit Administration (FTA) Circular FTA C4702.1B (October 1, 2012), - Title VI Requirements and Guideline for Federal Transit Administration Recipients. REAL Services submits Nondiscrimination Assurances to each of these funding sources which addresses compliance with Title VI, as well as nondiscrimination in hiring (EEO) and contracting (DBE), and nondiscrimination on the basis of disability (ADA), confirming the agency's commitment to nondiscrimination and compliance with Federal and state requirements in the provisions of services to the public. Authority for approval of the plan remains with the Board of Directors. It is submitted to oversight agencies as required.

Overview of Services: REAL Services, Inc. is a private, non-profit 501(c)(3) agency located in South Bend, Indiana. The agency serves as the designated focal point for aging services as Area 2 Area Agency on Aging serving LaPorte, St. Joseph, Elkhart, Marshall and Kosciusko counties; as well as the Community Action program serving St. Joseph, Elkhart, Marshall, Kosciusko and Fulton counties.

Public Participation Plan: REAL Services is governed by its Board of Directors with additional oversight provided by various advisory councils made up of representatives of the populations served its programs, including under-represented people groups and to the extent possible, limited English language proficient populations. Advisory councils have participation requirements that include, at a minimum, representatives of recipients of services of the agency, including older adults or individuals with disabilities, low-income persons and other vulnerable populations. Advisory Council members provide ongoing feedback and information on the needs of the various populations served by the agency, ensuring representation from the public in ongoing decision making and program implementation. Advisory Council meets, unless otherwise prohibited, are open to the public. Membership demographics are maintained by the agency and available upon request for its Board of Directors and each of the advisory councils.

REAL Services provides services directly, contracts for services through a competitive RFP process, and purchases services for enrolled participants. REAL Services gives notice to the public of its acceptance of the federal non-discrimination language and extends this requirement to its funded entities under contract with the agency.

REAL Services monitors sub recipients for compliance with contracts requirements related to Title VI as required by its state agency. Through its bi-annual community needs assessment, review of demographic data and community outreach efforts, REAL Services seeks input and participation from minority, low-income, Limited English proficient and other program recipients. Announcement of efforts related to outreach occurs through our website, monthly print and social media publications and direct mailing of outreach materials such as surveys. As a requirement of its funding, the agency must develop specific outreach plans and services based on the needs identified for various populations served by the agency, including individuals with disabilities, rural residents, low-income persons, older adults and other vulnerable populations. The outreach and involvement activities are made available to funders upon request or as required by contract.

Investigations, Complaints and Lawsuits: If there are complaints, investigations or lawsuits relative to Title VI, the applicable funding authority is informed. An annual log is maintained of any complaints or investigations and made available to funders as required by the related contract. The log is organized by type of complaint and program.

Public Notice Posting: Notice to the public of the elements of this plan are posted in all transportation vehicles and any agency location that is open to the public, including congregate meal sites. It is also posted on the agency's website and updated annually, as required, or more often if updates occur. All print materials includes the agency's nondiscrimination language, as required by funders. (see Attachment A)

Language and Access Assistance: Outreach efforts include assistance for providing meaningful access and language assistance for anyone who may need this support. The need for adapting of outreach efforts for those who require assistance is determined based on a review of the proportion of individuals within the programs who may need assistance, the frequency of contact, the nature and importance of the program or activity and the relative cost and available resources. Currently, the proportion and frequency of contact is low so the agency has staff who speak Spanish and maintains a contract for language services for other languages. Materials are also translated into Spanish and can be made available in other languages as requested.

Title VI of the Civil Rights Act require that "No person in the United States shall, on the basis of race, color, national origin, sex, age, disability, low income, and limited English proficiency (LEP), be excluded from or participation in, be denied the benefits of, or be otherwise subjected to discrimination under, any licensing program or activity receiving federal financial assistance." Additionally, REAL Services extends its nondiscrimination policy to include family status, ancestry, gender identity or status as a veteran.

REAL Services, believing in the dignity of all people, seeks to provide equitable service for participants of its programs and customers of its services. As required by various sub-recipient agreements, REAL Services incorporates nondiscrimination policies and practices in providing services to the public. As a sub-recipient of federal funds, REAL Services is required to conform to Title VI of the Civil Rights Act of 1964 (Title VI) and all related statutes, regulations, and directives, which provide that no person shall be excluded from participation in, denied benefits of, or subjected to discrimination under any program or activity receiving federal financial assistance. This plan will be updated periodically (at least every three years) to incorporate changes and additional responsibilities that arise. Copies of the plan are posted at all public locations, or site of services, for REAL Services and available on its website.

REAL Services efforts to prevent discrimination shall address, but are not limited to:

- The denial of services, financial aid, or other benefits provided under a program or in the delivery of a service.
- Distinctions in the quality, quantity, or manner in which the benefit is provided.
- Segregation or separation in any part of the program.
- Restriction in the enjoyment of any advantages, privileges, or other benefits provided to others.
- Different standards or requirements for participation.
- Methods of administration which directly or indirectly or through contractual relationships would defeat or impair the accomplishment of effective nondiscrimination.
- Discrimination in any activities related to any infrastructure or facility built or repaired in whole or in part with Federal funds.
- Discrimination in any employment resulting from a program, the primary purpose of which is to provide employment.

REAL Services acknowledges that it must apply income, residency, functional status, and other requirements to eligibility for particular programs, as required by those programs. The application of these requirements does not constitute discrimination for purposes of this policy.

The agency's Title VI Coordinator ensures implementation of the Title VI program and is responsible for substantiating that these elements of the plan are appropriately implemented and maintained, and for coordinating with those responsible for public outreach and involvement, and services planning and delivery.

How to File a Complaint or Grievance of Discrimination

Complaints may be filed by any person who believes that they have been excluded from participation in, denied the benefits of, or otherwise subjected to discrimination under any REAL Services program or activity whether federally funded or not. A complaint may also be filed by a representative on behalf of such a person. The signed complaint must be filed within 180 days of the date of the alleged discrimination (See Attachment B). REAL Services will promptly investigate all properly submitted complaints of alleged discrimination.

REAL Services will acknowledge receipt of your complaint within 10 business days and will endeavor to investigate and resolve the complaint within 60 days.

Complaints may be filed using any one of the following methods:

1. Obtain a Title VI Complaint Form by calling 800-552-2916 or email TitleVI@realservices.org.
2. Complete, sign, date and return the form to Title VI Coordinator, REAL Services, 1151 S. Michigan Street, South Bend, IN 46601.
3. Write out the complaint in your own words and include:
 - Your name, address and telephone number. If you are filing a complaint on behalf of another person, include their name, address, telephone number and your relationship to that person.
 - The name and address of the person, company, agency, institution, or department you believe discriminated against you.
 - A description of how, why and when you believe you were discriminated against. Include as much detail and information as possible about the alleged acts of discrimination.
 - The names of any persons that can be contacted for additional information to support or clarify your allegations.
4. Residents of South Bend may also file an inquiry or make a report to the Human Rights Commission by emailing humanrights@southbendin.gov, calling 574-235-9355 or completing their online inquiry form at <https://southbendin.gov/board/human-rights-commission/>.

The complaint form is also available in Spanish and other languages upon request. REAL Services will provide language assistance to persons with limited English proficiency (LEP).

REAL SERVICES, INC. NOTICE OF TITLE VI COMPLIANCE

COMPLIANCE WITH TITLE VI

- REAL Services, believing in the dignity of all people, provides its programs and services without regard to race, age, color, religion, sex, gender identity, disability, national origin, ancestry, familial status or status as a veteran.
- REAL Services gives notice of its policy to assure full compliance with Title VI of the Civil Rights Act of 1964 and all related statutes. Title VI requires that no person in the United States of America shall be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which REAL Services receives Federal financial assistance. To request a copy of REAL Services' Title VI policy by contacting the agency's coordinator at 800-552-2916 or TitleVI@realservices.org.

RIGHT TO FILE A COMPLAINT

- Any person who believes that they have, individually, or as a member of any group, been excluded from participation in, been denied the benefits of, or otherwise subjected to discrimination has the right to file a formal complaint.

PROCEDURE FOR FILING A TITLE VI COMPLAINT

- To obtain a form, contact the agency's Title VI Coordinator by calling 800-552-2916 or email TitleVI@realservices.org.
- The complaint procedures apply to the beneficiaries of REAL Services programs, activities and services.
- Information on the Title VI policy is available in other languages upon request.



REAL
SERVICES

1151 S. Michigan Street
South Bend, IN 46601



EXTERNAL COMPLAINT OF DISCRIMINATION

REAL SERVICES, INC.
1151 S. Michigan Street
South Bend, IN 46601
Email address: TitleVI@realservices.org
Telephone Number: (800) 552-2916

INSTRUCTIONS:

The purpose of this form is to help any person who believes that they have been excluded from participation in, denied the benefits of, or otherwise subjected to discrimination under any REAL Services, Inc. program or activity file a complaint or grievance of discrimination.

You are not required to use this form. You may write a letter with the same information, sign it and return it to the address printed above.

REAL Services will acknowledge receipt of your complaint within 10 business days and will endeavor to investigate and resolve the complaint within 60 days.

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- The denial of services, financial aid, or other benefits provided under a program or in the delivery of a service.
- Distinctions in the quality, quantity, or manner in which the benefit is provided.
- Segregation or separation in any part of the program.
- Restriction in the enjoyment of any advantages, privileges, or other benefits provided to others.
- Different standards or requirements for participation.

REAL Services, Inc. shall implement measures to ensure that persons with limited English proficiency and persons with disabilities have meaningful access to the services, benefits, and information of all its programs and activities under Executive Order 13166 and the Americans with Disabilities Act of 1990, as amended.

Upon request, assistance will be provided if you are an individual with a disability or have limited English proficiency. You also have the right to file a complaint with other state or federal agencies that provide federal financial assistance to INDOT. Additionally, you have a right to seek private counsel.

Please make a copy of your complaint form for your personal records. Do not send your original documents as they will not be returned. Mail the original complaint form along with any copies of documents or records relevant to your complaint to the address above.

Complaints of discrimination must be filed within 180 days of the date of the alleged discriminatory act. If the alleged act of discrimination occurred more than 180 days ago, please explain your delay in filing this complaint.

COMPLAINANT INFORMATION

Name (first, middle, and last)

Address

Telephone

Email address

PERSON YOU BELIEVE DISCRIMINATED AGAINST YOU

Name

Name of company/department

Address

Telephone:

Email:

When did the alleged discriminatory act occur? (month, day, year)

Complaints of discrimination must be filed within 180 days of the date of the alleged discriminatory act. If the alleged act of discrimination occurred more than 180 days ago, please explain your delay in filing this complaint:

The alleged discrimination was based on:

- Race Color Gender National Origin Disability
 Age Family Status Veteran Status Gender Identity

Describe the alleged act(s) of discrimination. (Use additional pages, if necessary.)

Provide the names of any individuals with additional information regarding your complaint:	
Name of witness 1	Title
Name of company	
Address (number and street, city, state and ZIP code)	
Telephone	Email
DESCRIPTION: Include a brief description of the relevant information the witness may provide to support your complaint of discrimination.	

Name of witness 2	Title
Name of company	
Address	
Telephone	Email
DESCRIPTION: Include a brief description of the relevant information the witness may provide to support your complaint of discrimination.	

FORMS CANNOT BE PROCESSED WITHINT A SIGNATURE

Signature	Date signed (month, day, year)
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