



**SEARCHLIGHT CENTER INC.**

**FY 2017  
Title VI/Nondiscrimination Plan  
For Sub-recipients**

Date filed with FTA 5310 Transportation:  
03-31-17

**Nondiscrimination Assurances**

Searchlight Center, 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.

Searchlight Center, 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. Searchlight Center, 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.

Searchlight Center, Inc. meets the objectives of the FTA Master Agreement which governs all entities applying for FTA funding, including Searchlight Center, 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).

Signature \_\_\_\_\_

Shirley Linville  
Chief Executive Officer

## Subrecipient's General Information

### 1. Provide subrecipient's mission statement

To consider abilities, not the disabilities of the people we serve as we assist them in accomplishing their goal of independence. To advocate, support, and provide a stimulating and healthy environment for both persons who are developmentally disabled and senior citizens.

### 2. History (including year started)

Searchlight Center, Inc. is a private not-for-profit company headquartered in Hobart, OK with offices in Hobart and Lawton.

Searchlight Center was established in 1985 by a group of parents as a "day-center" ...wanting to give their children who are disabled a safe place to go. It has since evolved to providing residential and vocational services to 75 individuals within the Hobart and Lawton community.

### 3. Regional Profile (regional population; growth projection)

Regional population includes those residing in SW Oklahoma, specifically Kiowa and Comanche Counties. Population estimates 133,242

### 4. Population served (in relation to regional population)

Population served are those residing in Hobart and Lawton with a combined population of 100,787

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

Service area is the city limits of Hobart, Ok and Lawton, Ok

### 6. Designated Title VI Coordinator (include name, contact information, attendance dates to Title VI trainings)

Leigh Standerfer- COO and Title VI Coordinator  
902 S. Park Rd.  
Hobart, Ok 73651  
580-726-6635  
lstanderfer@searchlightcenter.org

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

Board of Directors  
John Gish- President  
Louis Sims- Vice-President/Treasurer  
Kent Preston- Secretary  
Charlotte Kirk- Board Member  
Sharon Moad- Board Member  
Marian Pfenning- Board Member  
Ken-Sue Doerfel- Board Member



# Notice of Non Discrimination



**TITLE VI OF THE CIVIL RIGHTS ACT OF 1964 AS AMENDED AND 49 CFR PART 21** ENSURE THAT NO PERSON SHALL ON THE GROUNDS OF RACE, COLOR, OR NATIONAL ORIGIN, BE EXCLUDED FROM PARTICIPATING IN, OR BE DENIED THE BENEFITS OF, OR BE SUBJECT TO DISCRIMINATION UNDER ANY PROGRAM OR ACTIVITY RECEIVING FEDERAL FINANCIAL ASSISTANCE WITHOUT REGARD TO WHETHER SPECIFIC PROJECTS OR SERVICES ARE FEDERALLY FUNDED

For more information about the Title VI Civil Rights Program, please visit [www.okdhs.org](http://www.okdhs.org), click on the 'offices and locations' tab, and Office of Civil Rights. You may also contact Aging Services Division, 5310 Transportation staff at (405) 521- 2281.

## Who May file a Complaint?

Any person who feels that his/her request for access to transportation was denied because of discrimination as described above. He/she must file the complaint and provide contact information within 180 days following the incident by:

E-mail to: OKDHS/ASD/5310 Transportation Program at  
Patricia.Heer@okdhs.org.

Fax to: OKDHS/ASD/5310 Transportation Program at  
(405) 522-6738

Mail to: OKDHS/ASD/5310 Transportation Program  
2401 N.W. 23<sup>rd</sup>, Suite 40, Oklahoma City, OK 73107

If information is needed in another language, call 580-726-6635.

## Procedures For Filing A Complaint

The complaint procedures apply to the beneficiaries of Searchlight Center, Inc. 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 Searchlight Center, 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 Searchlight Center, Inc. Title VI Complaint Form at [www.searchlightcenter.org](http://www.searchlightcenter.org), or request a copy by writing to Searchlight Center, Inc. P.O. Box 804 Hobart, Ok 73651. Information on how to file a Title VI complaint may also be obtained by calling Searchlight Center, Inc. at 580-726-6635.

You may file a signed, dated complaint no more that 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; and
- 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 Leigh Standerfer, Title VI Coordinator P.O. Box 804 Hobart, Ok 73651.

COMPLAINT ACCEPTANCE: Searchlight Center, Inc. will process complaints that are complete. Once a completed Title VI Complaint Form is received, Searchlight Center, Inc. will review it to determine if Searchlight Center, Inc. has jurisdiction. The complainant will receive an acknowledgement letter informing them whether or not the complaint will be investigated by Searchlight Center, Inc.

INVESTIGATIONS: Searchlight Center, 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, Searchlight Center, Inc. may contact the complainant. Unless a longer period is specified by Searchlight Center, Inc., the complainant will have ten (10) days from the date of the letter to send requested information to the Searchlight Center, 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.

## Attachment D

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 Searchlight Center, Inc. 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. Searchlight Center, 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, Searchlight Center, Inc. will issue a determination letter to the complainant upon completion of the reconsideration review.

If information is needed in another language, contact Searchlight Center, Inc. at 902 S. Park Road Hobart, Ok 73651, or at 580-726-6635.

## Searchlight Center, Inc. Complaints Form

“No person in the United States shall, on the basis 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.”

If you feel that you have been discriminated against in the provision of transportation services, please provide the following information to assist us in processing your complaint. Should you require any assistance in completing this form or need information in alternate formats, please let us know.

Please mail or return this form to:  
 Searchlight Center, Inc.  
 Leigh Standerfer, Title VI Coordinator  
 P.O. Box 804  
 Hobart, Ok 73651  
[lstanderfer@searchlightcenter.org](mailto:lstanderfer@searchlightcenter.org)  
 (T) 580-726-6635  
 (F) 580-726-3878

PLEASE PRINT

1. Complainant's Name:		
a. Address:		
b. City:	State:	Zip Code:
c. Telephone (include area code): Home ( ) or Cell ( )		Work
( ) -		( ) -
d. Electronic mail (e-mail) address:		
Do you prefer to be contacted by this e-mail address? ( ) YES ( ) NO		
2. Accessible Format of Form Needed? ( ) YES specify: _____ ( ) NO		
3. Are you filing this complaint on your own behalf? ( ) YES If YES, please go to question 7. ( ) NO If no, please go to question 4		
4. If you answered NO to question 3 above, please provide your name and address.		
a. Name of Person Filing Complaint:		
b. Address:		
c. City:	State:	Zip code:
d. Telephone (include area code): Home ( ) or Cell ( )		Work
( ) -		( ) -
e. Electronic mail (e-mail) address:		
Do you prefer to be contacted by this e-mail address? ( ) YES ( ) NO		
5. What is your relationship to the person for whom you are filing the complaint?		
6. Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party. ( ) YES, I have permission. ( ) NO, I do not have permission.		
7. I believe that the discrimination I experienced was based on (check all that apply):		
( ) Race ( ) Color ( ) National Origin (classes protected by Title VI)		
( ) Other (please specify)		

Continued



Attachment E

8. Date of Alleged Discrimination (Month, Day, Year):
9. Where did the Alleged Discrimination take place?
10. Explain as clearly as possible what happened and why you believe that you were discriminated against. Describe all of the persons that were involved. Include the name and contact information of the person(s) who discriminated against you (if known). <i>Use the back of this form or separate pages if additional space is required.</i>
11. Please list any and all witnesses' names and phone numbers/contact information. <i>Use the back of this form or separate pages if additional space is required.</i>
12. What type of corrective action would you like to see taken?
13. Have you filed a complaint with any other Federal, State, or local agency, or with any Federal or State court? ( ) YES If yes, check all that apply. ( ) NO a. ( ) Federal Agency (List agency's name) b. ( ) Federal Court (Please provide location) c. ( ) State Court d. ( ) State Agency (Specify Agency) e. ( ) County Court (Specify Court and County) f. ( ) Local Agency (Specify Agency)
14. If YES to question 14 above, please provide information about a contact person at the agency/court where the complaint was filed.
Name: _____ Title: _____
Agency: _____ Telephone: ( ) _____ - _____
Address: _____
City: _____ State: _____ Zip Code: _____

You may attach any written materials or other information that you think is relevant to your complaint.

Signature and date is required:

\_\_\_\_\_  
Signature Date

If you completed Questions 4, 5 and 6, your signature and date is required:

\_\_\_\_\_  
Signature Date

**Documenting Complaints, Investigations, and Lawsuits**

All Title VI complaints will be entered and tracked in Searchlight Center, Inc. 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.

**Searchlight Center, Inc. Title VI Complaints, Investigations, and Lawsuits 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**

Searchlight Center, Inc. staff are given Title VI training, and agency can answer affirmatively to all the following questions:

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

## Searchlight Center, Inc. Limited English Proficiency Plan

### Introduction

This Limited English Proficiency (LEP) Plan has been prepared to address Searchlight Center, Inc. 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, "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 understands English is a type of national origin discrimination. It directs each agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discrimination does not take place. This order applies to all state and local agencies which receive federal funds, including all Searchlight Center, Inc. departments receiving federal grant funds.

Searchlight Center, Inc. has developed this LEP Plan to help identify reasonable steps for providing language assistance to persons with LEP who wish to access services provided. As defined 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, the ways in which assistance may be provided, staff training that may be required, and how to notify LEP persons that assistance is available.

To determine if the subrecipient is required to file an LEP Plan, first fill out the LEP Four Factor Analysis form.

### LEP Four Factor Analysis

In order to prepare this plan, Searchlight Center, Inc. used the four-factor LEP analysis which considers the following factors:

- 1. The number or proportion of LEP persons in the service area who may be served or are likely to require Searchlight Center, Inc. services.**

The Searchlight Center, Inc. staff reviewed the current U.S. census report and determined that in the Searchlight Center, Inc. service area 11,249 persons (10.6%) of populations speaks a language other than English. Of those 11,249 persons 9,900 (88%) have limited English proficiency; that is, they speak English "not well" or "not at all", this is 9.3% of the overall population in the service area. In Searchlight Center, Inc. service area, of those persons with limited English proficiency, 7,920 speak Spanish, 248 speak Indo-European, and 1,732 speak Asian or other Pacific Islander Languages.

**2. The frequency with which LEP persons come in contact with Searchlight Center, Inc. services.**

Searchlight Center, Inc. staff reviewed the frequency with which the board/council, office staff and bus drivers have or could have, contact with LEP persons. This includes documenting phone inquiries of office visits. To date, Searchlight Center, Inc. has received 0 requests for translated programs and documents.

**3. The nature and importance of services provided by Searchlight Center, Inc. to the LEP population.**

There is no large geographic concentration of any type of LEP individuals in the service area for the Searchlight Center, Inc. The overwhelming majority of the population, 90%, speak only English. As a result, there are few social, service, professional and leadership organizations within Searchlight Center, Inc. service area that focus on outreach to LEP individuals. Searchlight Center, Inc. Board/council, office staff and bus/van drivers are most likely to encounter LEP individuals through bus/van rides, office visits, phone conversations, and attendance at Board/Council meetings.

**4. The resources available to Searchlight Center, Inc. and the overall costs to provide LEP assistance.**

Searchlight Center, Inc. reviewed its available resources that could be used for providing LEP assistance and which of its documents would be most valuable to be translated if the need should arise. Searchlight Center, Inc. has contacted local citizens that would be willing to provide voluntary Spanish translation if needed, within a reasonable time period. Other language translation if needed would be provided through a telephone interpreter line for which the Searchlight Center, Inc. would pay a fee.

Based on the Four Factor Analysis, our research shows that in the Searchlight Center, Inc. service area, we exceed the minimum requirement of 5% or 1,000 individuals whichever is less. Therefore, a LEP Plan is required. Listed below are the resources used to obtain this information. Examples of resources can be found at Attachment I.

Attachment G

Resources:

Resource #1 <http://www.census.gov>

Resource #2 <http://www.factfinder2.census.gov>

Searchlight Center, Inc. agrees to the following requirements of an LEP Plan as mentioned below:

### **Language Assistance**

A person who does not speak English as their primary language and who has a limited ability to read, write, speak or understand English may be a Limited English Proficient person and may be entitled to language assistance with respect to Searchlight Center, Inc. services. Language assistance can include interpretation, which means oral or spoken transfer of a message from one language into another language and/or translation, which means the written transfer of a message from one language into another language.

Searchlight Center, Inc. staff will identify persons who speak English “not well” or “not at all” by:

- Posting notice of LEP Plan and the availability of interpretation or translation services free of charge in languages LEP persons would understand.
- Providing “I Speak” cards to assist in identifying the language interpretation needed if the occasion arises.
- Informally surveying experiences concerning any contacts with LEP persons during the previous year.
- Offering a translator (LEP) or interpreter (sign language for hearing impaired individuals) at informational meetings or events. Volunteer interpreters for Spanish are available and will be provided within a reasonable time period. Language interpretation will be accessed for all other languages through a telephone interpretation service. Additionally, a staff person may greet participants as they arrive. By informally engaging participants in conversation, it is possible to gauge each attendee’s ability to speak and understand English. Although translation may not be able to be provided at the event, it will help identify the need for future events.

### **Staff Training**

The following training will be provided to all Searchlight Center, Inc. staff:

- Information on the Title VI Policy and LEP responsibilities.
- Description of languages assistance services offered to the public.

#### **Attachment G**

- Use of “I Speak” cards.
- Documentation of language assistance requests.
- How to handle a potential Title VI / LEP complaint.

All contractors or subcontractors performing work for Searchlight Center, Inc. will be required to follow the Title VI / LEP guidelines.

### **Translation of Documents**

After weighing the cost and benefits of translating documents for potential LEP groups, and considering the expense of translating the documents, the likelihood of frequent changes in documents and other relevant factors, Searchlight Center, Inc. will consider the following options:

- Initiate an outreach program for translation services.
- When staff prepares a document or schedules a meeting for which the target audience is expected to include LEP individuals, then documents, meeting notices, flyers, and agendas will be printed in an alternative language based on the known LEP population.

### **Monitoring and Updating the LEP Plan**

Searchlight Center, Inc. will update the LEP Plan as required. At a minimum, the plan will be reviewed and updated when data from the next U.S. Census is available, or when it is clear that higher concentrations of LEP individuals are present in Searchlight Center, Inc. service area. Updates will include the following:

- The number of documented LEP person contacts encountered annually.
- How the needs of LEP persons have been addressed.
- Determination of the current LEP population in the service area.
- Determination as to whether the need for translation services has changed.
- Determine whether local language assistance programs have been effective and sufficient to meet the need.
- Determine whether Searchlight Center, Inc. financial resources are sufficient to fund language assistance resources needed.
- Determine whether Searchlight Center, Inc. fully complies with the goals of this LEP Plan.
- Determine whether complaints have been received concerning the agency's failure to meet the needs of LEP individuals.
- Maintain a Title VI complaint log, including LEP to determine issues and basis of complaints.

### **Dissemination of the Searchlight Center, Inc. LEP Plan**

Searchlight Center, Inc. will notify LEP persons of the LEP Plan and how to access language services, by posting signs at conspicuous and accessible locations which may include but not limited to the following:

Attachment G

- [www.searchlightcenter.org](http://www.searchlightcenter.org)
- Post Office
- County DHS Office
- 5310 Transportation Office
- Senior Center(s)
- Doctor's Offices
- Other

State on agendas and public notices in the language those LEP persons would understand that documents are available in that language upon request at Searchlight Center, Inc. office.

Attachment H

**Public Participation Plan**

**Identification of Searchlight Center, Inc. Stakeholders by Race**

<b>Stakeholders</b>	<b>Caucasian</b>	<b>Latino</b>	<b>African American</b>	<b>Asian American</b>	<b>Total</b>
Board of Directors	7				7
Advisory Bodies					
Transit Riders/Clients	62	7	24		93
Private Businesses/Organizations					
Others					

**Searchlight Center, Inc. Outreach Practices**

Searchlight Center, Inc. ensures all outreach strategies, communications and public involvement efforts comply with Title VI. Searchlight Center, Inc. Public Engagement 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. 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, convenient times, and compliant with the Americans with Disabilities Act.

Aligned with the above referenced communication tactics, Searchlight Center, 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.

## 2014-2017 Title VI Program Public Engagement Process

Searchlight Center, Inc. will conduct a Public Engagement Process for the 2014-2017 Title VI Program. This process includes posting the Title VI Plan and seeking/encouraging input from the public. Searchlight Center Inc., is ready and able to 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.

### Attachment H

Searchlight Center, Inc. will conduct a 30-day public comment period to provide opportunities for feedback on the 2014-2017 Title VI Program.

Comments are accepted during the public outreach period via:

- Dedicated email address
- Website
- Regular mail
- Telephone
- In person

Searchlight Center, Inc. will provide a briefing to the Board of Directors and Advisory Bodies regarding all public comments prior to decision making. A publicly available summary report is compiled, including all individual comments.

### Summary of Searchlight Center, Inc. 2014-2017 Public Outreach Efforts

Searchlight Center, Inc. has its Title VI Plan posted on its website and encourages comments from the public. Searchlight Center Inc., also publically posts the Title VI Plan, encouraging comments, in visible site within both office locations in Hobart and Lawton.