

# Title VI Reference Materials

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## Title VI Notice to Public

CHC/SEK and BHI will include the following notification of nondiscrimination in all transit vehicles, websites, public areas of CHC/SEK and BHI offices, as required under U.S. Department of Transportation's Title VI regulations. The Notice of Nondiscrimination will include information on how to request additional information on BHI's Title VI policies, obligations, and how to file a complaint. KDOT-provided Title VI Brochures will also be made available.



Notification of Rights  
Title VI of the Civil Rights Act

Community Health Center of Southeast Kansas, Inc. (CHC/SEK) and its subsidiary Building Health, Inc. (BHI) operate their 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 they have been wronged by any unlawful discriminatory practice under Title VI may file a complaint with CHC/SEK.

For more information on CHC/SEK and BHI's civil rights program and the procedures to file a complaint, contact 1-620-231-9873, email [compliance@chcsek.org](mailto:compliance@chcsek.org), or visit our administrative office at 3015 N. Michigan, Pittsburg, Kansas, 66762.

A complaint may also be filed directly with the Federal Transit Administration at the following address:

Office of Civil Rights  
Attn: Title VI Program Coordinator  
East Building, 5th Floor - TCR 1200  
New Jersey Avenue, SE Washington,  
D.C., 20590

If this information is needed in another language, contact CHC/SEK at 1 - 620 - 231 - 9873 or the Federal Transit Administration at 1-866-377 -8642.

## Transit Public Participation Plan Outline

1. Brief description of provider's activities and services:

Building Health Inc. is a subsidiary of the Community Health Center of Southeast Kansas, Inc. (CHC/SEK), a Federally Qualified Health Center (FQHC), and a Kansas not-for-profit corporation. Both are recognized as a charitable organization exempt from federal income tax under the Internal Revenue Code of 1986, as amended. CHC/SEK provides medical, dental, behavioral health, addiction treatment, and case management services to all regardless of ability to pay, with clinics in Allen, Linn, Bourbon, Crawford, Cherokee, Labette, and Montgomery counties in Kansas and in Ottawa and Washington County, Oklahoma and serves about 80,000 patients for over 250,000 visits per year.

Building Health Inc. has a mission to address the social determinants of health in CHC/SEK's service area, in support of the overall region's health. Presently, this includes providing services to people experiencing homelessness, providing General Public Transportation, Transportation for the Elderly and Disabled, and non-emergency medical transportation. These transportation services are collectively referred to as CareVan.

2. Brief description of activities that would warrant public participation (i.e. fare changes, changes to service hours, route adjustments, service area changes).

Building Health Inc. (BHI) will hold a public forum at least once yearly to cover topics such as service hours, route adjustments, fare changes, or general operations including capacity, accessibility and rider satisfaction. The forum will be completed by May of each year to incorporate relevant feedback by July 1<sup>st</sup> (or start of the applicable fiscal year). All meetings will be available in-person and through web conference, and open and advertised to the public using social media and other marketing platforms.

3. Brief description of the proactive public participation strategies would be used.

BHI pulls strategies from information gathered at local coalition meetings, and relevant community groups. We use our website, social media platforms, and local newspapers to advertise for Transportation services. We will continue to promote public transportation during community events. Additionally, BHI, in cooperation with CHC/SEK, conducts quarterly rider satisfaction surveys to learn more about our riders experience and opportunities to adjust our services.

4. Brief description of outreach methods to engage minority and Limited English Proficiency (LEP) individuals (i.e. translation of public meeting materials, providing translation services if requested, targeted media messages in low income neighborhoods of service area, Work with existing neighborhood and advocacy organizations).

The clinics operated by Community Health Center of Southeast Kansas, Inc. (CHC/SEK) often are the medical centers of choice for people with limited English proficiency, and therefore we advertise our CareVan in all clinic waiting rooms and our medical providers and Community Health Workers refer the CareVan to all patients who are potentially transit dependent. CHC/SEK and BHI provides translation of public meeting materials, providing translation services as requested, and work closely with community advocacy groups to learn and inform. As mentioned, the organization is embedded in many types of community engagement groups such as coalitions, formal partnerships with school districts, among others. These community partnerships serve to provide a voice for the LEP communities.

5. Brief description of the desired outcomes of the agency's public participation efforts.

In general, desired outcomes could include, but are not limited to, the following:

- The agency desires to actively engaged transit riders, stakeholders, and members of the general public in the decision-making process.
- The agency strives to give adequate public notice of public participation activities and allow proper time for public review and comment at key decision points.
- The agency desires to provide timely information about transportation issues and processes to transit riders, stakeholders, and members of the general public.
- The agency will provide responses to all public input as appropriate.
- The agency will have facilitated effective communication among a diverse group of stakeholders.
- The agency will have established a timetable for review of the Public Participation Process to ensure it provides full and open access to all.
- The agency will utilize public input to extend our reach in current communities and launch into new communities where needs are prevalent.

6. Brief summary of recent outreach efforts over the past three years.

As a wholly-owned subsidiary of a Federally Qualified Health Center, BHI participates in the FQHC's Community Health Needs Assessment for our entire service area, required yearly. This process includes reviewing other organizations' published needs assessments, including partners like Community Action Programs and local hospital systems. Transportation has always been a top community concern for our service areas and is frequently brought up in the community coalitions and in any need's assessment processes. We have used publicly available data and our own experiences with our patients to assess the need. We look forward to continuing transportation-specific outreach efforts since we have received vehicles and hired dedicated staff members. Quarterly, CHC/SEK staff make phone calls to randomly selected transportation riders to ask about their satisfaction with services and record any input they offer.

We have presented to County Commissions in Bourbon, Crawford, and Cherokee Counties, hearing feedback from the Commissioners. Additionally, we present our transportation program outcomes to the City Commissioners in Pittsburg, Fort Scott, and Columbus and record any input they may offer. We advertise in all local papers, and share refrigerator magnets with CareVan's dispatch number with supportive service and government agencies for distribution.

## Limited English Proficiency (LEP) Plan

In order to improve access to federally conducted and federally assisted programs and activities for persons who are limited in their English proficiency, BHI and CHC/SEK have established the following Limited English Proficiency (LEP) Plan, to ensure we are prepared to support our whole community. The following four factor analysis assisted us in determining the needs within our region and service area, and informed the development of our language assistance plan.

**Factor 1:** The number of, or proportion of, LEP individuals that can utilize the service provided by BHI. The percentage of the total county population who speaks English "less than very well" is outlined in the following table:

*Table 1: U.S. Census Bureau: 2022 American Community Survey, Table C16001; dataset ACSDT5Y2022*

	Current Service Area		
	Bourbon	Cherokee	Crawford
Total Population	13,497	18,146	36,774
% of total population who speak English "less than very well"	0.59%	0.52%	<b>0.84%</b>

Additionally, Crawford County is home to Pittsburg State University, which has a robust international student population, which is not reflected in US Census data. That said, the percentage and number of people reporting to speak English "less than very well" is not large enough to require written translation of all materials. BHI will, however, secure translation and interpretation through CHC/SEK's interpretation services.

**Factor 2:** The frequency in which LEP individuals come in contact with BHI and CHC/SEK's General Public Transportation Services.

Less than 1% of the calls to dispatch seeking a ride are Non-English-speaking community members, and of those, all have been Spanish speaking. Our dispatch operator asks the caller to please hold by saying "Un momenta," then transfers the call to a Spanish speaking colleague, who serves as an interpreter during the remainder of the dispatch call.

Within our dispatch software, the dispatcher will then establish an alert, so the drivers will know they are going to transport a non-English speaking rider. Typically, these riders are also CHC/SEK patients,

and a CHC/SEK employed interpreter will ride along. If the rider is not a CHC/SEK patient, then dispatch will work to secure a CHC/SEK interpreter to join the driver on the transit journey.

**Factor 3:** The importance of the service to the LEP community:

We recognize that the general public transportation that we provide is not only addressing a rider's lack of transportation, but also addresses social isolation, in many instances. Our transit service allows transit dependent people to move throughout the community upon their own volition, accessing groceries, prescription medication, medical appointments, and more. This sense of autonomy is important to regulated mental health and community cohesion, and accessing these services in our community are essential to a person's overall well-being.

Moreover, many of our riders live alone in remote locations and are experiencing social isolation. Our team goal is to treat everyone with respect and interest, and our dispatch and drivers enjoy professional, yet friendly, relationships with our riders. This addresses the need for social inclusion, which is imperative to health and longevity.

**Factor 4:** The resources available and the respective costs of these resources:

CHC/SEK employs, and BHI has access to, several multi-lingual or bi-lingual persons in a variety of positions who also function as interpreters for the communities we serve. Access to these interpreters has no cost to the patients or transit riders.

### **Limited English Proficiency (LEP) Plan**

#### Identified LEP Individuals

Based on the above Four Factor Analysis, we do not identify any specific populations that require written translation. That said, we recognize a very small percentage of our population may require translation or interpretation services, and we have a plan in place to access those services through CHC/SEK's employees.

#### Language Assistance Measures

CHC/SEK employs, and BHI has access to, several multi -lingual or bi-lingual persons in a variety of positions, and they all also function as interpreters for the communities we serve. These employees' partner with our dispatch and drivers to provide interpretation for non-English speaking riders. Should these riders require translation of any materials, the same multi - or bi-lingual employees can provide such, at no cost to the rider.

#### Training Staff

When new staff are hired, and before they begin the work within their job description, they attend a full-day onboarding orientation to the entire CHC/SEK and BHI community, where they are oriented with our mission, vision, values, policies and procedures, as well as resources. They learn about the appropriate channels to access interpretation support. Moreover, all staff have access to resources on

the organization's intranet, wherein they can view and contact community resources, both internal and external.

### Providing Notice

This LEP plan will be posted on our organizations website and provided to any person or agency requesting a copy. The person of contact in regards to the LEP plan is Becky Gray and can be reached via email at bgray@chcsek.org.

If a complaint is to be filed by a LEP individual, we will use the Title VI Complaint Procedures.

### Monitoring and Updating LEP Plan

At a minimum, our agency will update the LEP plan according to the Title VI update schedule, which is every three years. The plan will also be updated anytime changes in the demographics of our service area are deemed significant in regards to LEP persons.

### Title VI Complaint Procedure

The following pertains only to Title VI complaints regarding the services of CHC/SEK and BHI.

Title VI, 42 U.S.C. §2000d et seq., was enacted as part of the Civil Rights Act of 1964. At the heart of the regulation is the statement that:

*No person in the United States shall, on the ground 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.*

CHC/SEK and BHI have in place a Title VI Complaint Procedure, which outlines a process for local disposition of Title VI complaints and is consistent with guidelines found in Chapter III of the Federal Transit Administration Circular 4702.18, dated October 1, 2012. If you believe that CHC/SEK's or BHI's federally funded programs have discriminated your civil rights on the basis of race, color, or national origin you may file a written complaint by following the procedure outlined below:

#### **Submission of Complaint**

Any person who feels that he or she, individually or as a member of any class of persons, on the basis of race, color, or national origin has been excluded from or denied the benefits of, or subjected to discrimination caused by BHI or CHC/SEK, may file a written complaint with CHC/SEK's Chief Compliance Officer or designee. A sample complaint form is available for downloaded at *(provide link to complaint form)* and is available in hard copy at the offices of *(agency name)*. Upon request, the *(agency name)* will mail the complaint form. **Such complaints must be filed within 180 calendar days after the date the discrimination occurred.**

After receipt of a complaint regarding Title VI, CHC/SEK's Chief Compliance Officer (or designee) **will** investigate the complaint fully and determine what steps need to be taken to address the issue. The Chief Compliance Officer (or designee) will begin an investigation into the complaint within three (3) business days of receipt. Investigations will be completed as soon as possible, however, may take up to ninety (90) days.

### **Referral to Review Officer**

Upon receipt of the complaint, the Chief Compliance Officer shall appoint one or more staff review officers, as appropriate, to evaluate and investigate the complaint. If necessary, the Complainant shall meet with the staff review officer(s) to further explain his or her complaint. The staff review officer(s) shall complete their review no later than 45 calendar days after the date the agency received the complaint. If more time is required, the Chief Compliance Officer shall notify the Complainant of the estimated timeframe for completing the review. Upon completion of the review, the staff review officer(s) shall make a recommendation regarding the merit of the complaint and whether remedial actions are available to provide redress. Additionally, the staff review officer(s) may recommend improvements to BHI or CHC/SEK's processes relative to Title VI, as appropriate. The staff review officer(s) shall forward their recommendations to the Chief Operating Officer for concurrence. If the Chief Operating Officer concurs, he or she shall issue BHI or CHC/SEK's written response to the Complainant. This final report should include a summary of the investigation, all findings with recommendations, corrective measures where appropriate.

**Note: Upon receipt of a complaint, BHI or CHC/SEK shall forward a copy of this complaint and the resulting written response to the appropriate KDOT and FTA-Region 7 contacts.**

### **Request for Reconsideration**

If the complainant disagrees with CHC/SEK's determination, the complainant may request reconsideration in writing within seven (7) days of the letter of closure or letter of finding being sent. BHI or CHC/SEK will notify the complainant within ten (10) business days of the decision to accept or reject the request for reconsideration.

The request for reconsideration shall be sufficiently detailed to contain any items the Complainant feels were not fully understood by the Chief Compliance Officer (CCO). The Chief Executive Officer (CEO) **will** notify the Complainant of his or her decision in writing either to accept or reject the request for reconsideration within 30 calendar days. In cases where CHC/SEK's Chief Executive Officer (CEO) agrees to reconsider, the matter shall be returned to the Chief Compliance Officer (CCO) to re-evaluate.

### **Submission of Complaint to the State of Kansas Department of Transportation.**

If the Complainant is dissatisfied with BHI and CHC/SEK's resolution of the complaint, he or she may also submit a written complaint within 180 days after the alleged date of discrimination to the State of Kansas Department of Transportation for further investigation.

KDOT Office of Contract Compliance  
Eisenhower State Office Building  
700 Southwest Harrison  
3rd Floor West  
Topeka, KS 66603

A complaint may also file with the Federal Transit Administration at the following address:

Office of Civil Rights  
Attn: Title VI Program Coordinator  
East Building, 5th Floor - TCR  
1200 New Jersey Avenue, SE  
Washington, D.C., 20590

CHC/SEK Title VI Complaint Form



Title VI  
Complaint Form

*The purpose of this form is to assist you in filing a complaint with CHC/SEK regarding Title VI violation. Your oral or written communication will be sufficient.*

Name: \_\_\_\_\_ Telephone: \_\_\_\_\_  
Address: \_\_\_\_\_ City: \_\_\_\_\_  
State: \_\_\_\_\_ Zip Code: \_\_\_\_\_  
Email Address: \_\_\_\_\_

Are you filing this complaint on your own behalf?  Yes  No  
If no, who are you providing the complaint on the behalf of? \_\_\_\_\_

When did the incident occur? \_\_\_\_ / \_\_\_\_ / \_\_\_\_

What was the time of the incident? \_\_\_\_\_

What was the name of the driver or employee? \_\_\_\_\_

I believe I was discriminated against on the basis of  Race  Color  National Origin

Describe what occurred and why you believe you were discriminated against:  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

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

List of Title VI Investigations, Lawsuits and Complaints

	Date Submitted/Filed (Month, Day Year)	Summary of allegation (include basis of complaint: race, color or national origin)	Status	Resolution/Action
				Taken
<b>Investigations</b>				
1				
2				
<b>Lawsuits</b>				
1				
2				
<b>Complaints</b>				
1				

Table Depicting Membership of Board and Population within service area, Broken Down by Race

	Bourbon	Crawford	Cherokee	Organization Board of Directors
<b>White</b>	90.4%	90.1%	88.8%	85%
<b>Black or African American</b>	2.9%	2.1%	0.9%	0%
<b>American Indian and Alaskan Native</b>	0.0 %	0.5%	2.4%	0%
<b>Asian</b>	0.4%	1.7%	0.3%	0%
<b>Native Hawaiian</b>	0.0%	0.1%	0.2%	0%
<b>Some other Race</b>	1.0%	0.7%	0.4%	0%
<b>Hispanic or Latino</b>	3.1%	6.4%	3.2%	15%

Recertification

This Title VI Plan was approved by the Building Health, Inc. Board of Directors on November 3, 2025..