



Title VI Program Plan and Relevant Policies

Title VI Program Statement and Applicability

Title VI requires that no person in the United States shall be excluded from participation in, denied the benefits of, or otherwise subjected to discrimination under any program or activity that receives federal funding on the basis of a protected category.

It is Spiritrust Lutheran® policy, in accordance with Title VI of the Civil Rights Act of 1964 and the U.S. and Pennsylvania Department of Transportation applicable laws and regulations, to ensure that no person shall be unlawfully discriminated against on the basis of race, color, national origin or other protected classes. The agency will comply with the laws and regulations relative to non-discrimination in federally-assisted programs of the U.S. Department of Transportation, the Federal Highway Administration, and the Pennsylvania Department of Transportation as they may be amended from time to time, which are herein incorporated by reference.

Our commitment extends to all services and programs, such that no person will be unlawfully excluded from participation in, denied the benefits of, or otherwise be subject to discrimination in the terms and conditions of services. To that end, Spiritrust Lutheran commits to:

- Conduct and operate its programs and services with all requirements imposed by, or pursuant to, the law;
- Provide non-discriminatory methods of administration for services;
- Promptly take any measures necessary to effect compliance with Title VI of the Civil Rights Act and other laws.

Furthermore, the agency's efforts to prevent discrimination will address, but not be limited to, a program or services' impact upon access, benefits, participation, services, contracting opportunities, complaint investigations, fund allocations, project and services prioritization, planning and more.

Additionally, this policy applies to all potential contracts with third-party contractors. The agency will not discriminate on the grounds of race, color, national origin, or another protected class in the selection and retention of subcontractors, including procurements of materials and leases of equipment. The agency holds its contractors and its decisions to these same values.

Title VI Assurances

Spiritrust Lutheran gives assurances about its commitment to non-discrimination. In accordance with the law, the agency gives assurance that it will promptly take any measures necessary to ensure that:

- No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, denied the benefits of, or otherwise subjected to discrimination under any program or activity for which the agency receives federal financial assistance from the Department of Transportation.

Additionally, SpiriTrust Lutheran gives the following specific assurances:

- The agency agrees that each federally funded service will be facilitated, operated and conducted in compliance with all requirements imposed by law.
- When the agency makes a solicitation for bids on work connected with services subject to regulation in this policy, it will affirmatively ensure that all bidders, including disadvantaged business enterprises, be afforded a full and fair opportunity to compete for work.
- The agency will reiterate its prohibitions on discrimination to its contractors.
- The agency agrees that the United States has a right to seek judicial enforcement with regard to any matter arising under the law.

Limited English Plan

Title VI and related statutes and authorities' prohibition of discrimination based on national origin have been interpreted to mean that no person shall be denied access to services due to limited English proficiency (LEP). The federal and state regulatory definition of LEP persons mean those who do not speak English as their primary language and have limited ability to read, speak, write or understand English. Therefore, because the agency makes its services available to all, it has some resources available for those LEP persons who need assistance.

The agency outlines the same four-factor analysis when analyzing its programs and services as the United States and Pennsylvania Departments of Transportation. Those four factors are:

- Number and proportion of LEP persons eligible to be served or likely to be encountered by a service;
- Frequency with which LEP individuals come into contact with the services;
- Nature and importance of the service provided;
- Available resources

SpiriTrust Lutheran has developed this LEP Plan to help identify reasonable steps for providing language assistance to persons with LEP who wish to access our services and programs.

- The agency has identified, and actively continues to identify, the proportion of LEP persons in its service areas who may be served, or are likely to require, agency services.
- The agency will review local census data, when relevant, for any potential changes to this provision, this plan, agency services, or available translation services.
- Our agency reviews the frequency with which the agency and office staff have, or could have, contact with LEP persons. This includes potentially documented phone calls or office visits. While the agency does not have regular contact with LEP persons who need language assistance, it is committed to equally providing services to all.
- There is no large geographic concentration of LEP persons in the agency's service area as the overwhelming majority speak only English. Nonetheless, the agency opens its services to all and maintains this policy and available assistance tools.
- If an LEP person contacts Human Resources or the Title VI Administrator and informs the agency that language assistance is needed, the agency will make all efforts to provide translation so he or she can enjoy the services to the fullest. Advance notice is required. Language assistance can include oral, written or demonstrative translation.

- All staff who speak different languages are encouraged to report their capabilities to the Human Resources Department or the Title VI Administrator and volunteer to help the agency's LEP plan.
- The agency may also periodically, and if requested as needed, publish certain policies, plans, and services in a different translation.

This plan includes providing for the communication of information contained in vital documents, including, but not limited to, the Client/Participant Bill of Rights, Consent to Treat, and Admission Booklet. SpiriTrust Lutheran will provide interpreters, translators and other aids at no cost to residents, clients and others whom we serve. We also will inform families and responsible parties of the availability of this assistance.

Environmental Justice Analysis

The agency recognizes the importance of identifying Environmental Justice (EJ) populations. The federal and state regulatory definition of EJ populations means low-income and minority populations. These populations often have specific and unique healthcare needs the agency must consider these factors during planning, building and maintenance processes. EJ populations reside in urban, suburban and rural areas and are protected under the law. EJ refers to meeting the needs of these underserved communities by reducing disparate environmental burdens, removing barriers to participation in decision-making, and increasing access to environmental benefits that help make all communities safe, vibrant, and healthy places to live, work, learn and engage in recreation.

It is our policy to provide outstanding management of the natural and cultural resources entrusted to us in a manner sustainable, equitable, accessible and inclusive of all populations. The Human Resources Department ensures compliance with any applicable environmental statutes and standards, and developing and maintains internal administrative policies, standards, objectives, and procedures for the agency.

The agency has several major EJ goals. They include:

- Ensure management is aware of this plan and is able to identify and amend services and policies under their purview that may have disproportionately high and adverse human health or environmental effects on minority, low-income or tribal populations
- Ensure minority, low-income, and tribal populations are provided the opportunity to engage in meaningful involvement in the agency's decision-making processes
- The agency may, on its own or in collaboration with partners, identify and address environmental impacts that may result in disproportionately high and adverse human health or environmental effects on minority, low-income, or tribal populations
- Use existing service as available to aid and empower minority, low-income and tribal populations in their efforts to build and sustain environmentally and economically sound communities
- Monitor updates from relevant federal and state agencies on EJ best practices.

Public Participation Plan

The purpose of the Public Participation Plan is to provide the public with an understanding of the agency's services and methods used for public engagement. The agency is dedicated to providing public outreach efforts that comply with and exceed the law's requirements. The agency believes that it offers its own services best when the public actively participates in service design and feedback.

The agency welcomes all feedback from the public about its services and its compliance with federal and state regulations under Title VI and other laws. Similarly, the agency welcomes all feedback on its LEP Plan and Environmental Justice Analysis to serve better the applicable communities. The agency provides educational presentations and informational resources in the community as staff expertise permits.

All feedback should be directed in a constructive manner to the agency's Human Resources Department or the Title VI Administrator. The Human Resources team and the Title VI Administrator will then evaluate all feedback and make appropriate remedial, investigative or improvement steps. Any public individual impacted by the agency's programs and services is welcome to provide feedback. If any member of the public also would like to submit relevant materials or documents germane to specific feedback, they should do so. No individual will be retaliated against or denied agency services for engaging in the public participation plan.

Title VI Complaint Mechanism

The agency asks all persons who believe they have been the victim of discrimination or harassment, have seen discrimination or harassment, or believe the agency is violating its Title VI obligations to report it to the Human Resources Department. The Title VI Administrator is the Vice President of Human Resources. Complainants may, but need not, use the [ADA and Title VI Civil Rights Complaint Form](#) that follows this policy. Impermissible discrimination and harassment includes, but is not limited to, disparate treatment based on one's race, color, national origin, disability, or any other protected class.

Upon receipt of a good-faith complaint, the Human Resources team and Title VI Administrator will launch a confidential, thorough investigation. Generally, the investigation will include the gathering of all applicable documents or evidence and the conducting of relevant interviews, if applicable. Confidentiality will be maintained on a need-to-know basis. If the agency needs to temporarily remove individuals from participation in a program or activity pending the investigation, it will do so. To the extent possible, the agency will notify the reporter of the investigation's conclusions and remedies. Team members or program participants who make a report in good faith or who participate in an investigation of allegations will not be subject to retaliation. Complaints also may be made to the Pennsylvania Department of Transportation-Title VI Coordinator.

If team members or program participants would like to give feedback or input into any program or activity, the agency will always listen. We welcome comments from all individuals, regardless of whether it is a bona fide complaint or a mere suggestion.

Title VI Administrator

The Vice President of Human Resources serves as the Title VI Coordinator. The Title VI Administrator is responsible for ensuring the implementation of the agency's Title VI programs. The Title VI Administrator acts as the responsible managerial official in matters relating to Title VI and assists the agency in carrying out its Title VI responsibilities.

Specifically, the Title VI Administrator has the responsibility to:

- Recommend, develop, disseminate, monitor and pursue agency policies on the implementation of Title VI and assist the operating elements in the establishment of Title VI programs;
- Prepare uniform agency policies and directives;
- Advise the senior management concerning significant developments in the implementation of the relevant Title VI programs;
- Review, evaluate and monitor operating activities and programs relating to Title VI and effectuate changes to assure consistency and program effectiveness;
- Monitor compliance with the law, this plan, and the aforementioned assurances;
- Provide leadership, guidance, and technical assistance to all staff and public members carrying out Title VI responsibilities;
- Ensure that all complaints of discrimination alleging noncompliance with Title VI, this policy, and other laws, are processed, investigated, and resolved in a fair and timely manner in accordance with the law, this policy and agency procedures;
- Take appropriate, fair, and timely action with regard to all findings of noncompliance under Title VI by initiating or participating in an investigation and resolution procedure;
- Provide primary coordination with team members to achieve program objectives;
- Disseminate information to, and provide continuous and meaningful consultation with, the public concerning the agency's Title VI program, including, in appropriate situations, the provision of material in languages other than English.

Periodic Review

The SpiriTrust Lutheran® Board of Directors reviews and updates policies at least once a year. Individuals with questions or requiring additional information to this policy should contact the Human Resources Department, the Title VI Administrator, or the Pennsylvania Department of Transportation's Director of the Bureau of Equal Opportunity.

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