

Inspiring Personal Independence

SOUTHEAST ALASKA INDEPENDENT LIVING



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Southeast Alaska Independent Living, Inc. (SAIL)

Title VI Program

Southeast Alaska Independent Living (SAIL)

Title VI Plan

**Title VI Plan
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A. Title VI Assurances

Southeast Alaska Independent Living, Inc. (SAIL) 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.

SAIL 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. SAIL further ensures every effort will be made to ensure nondiscrimination in all programs and activities, whether those programs and activities are federally funded or not.

SAIL meets the objectives of the Federal Transit Administration (FTA) Master Agreement which governs all entities applying for FTA funding, including SAIL 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).

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B. Agency Information

1. Mission of Southeast Alaska Independent Living (SAIL)

SAIL's mission is to, "Inspire Personal Independence". Centers for Independent Living exist all over the country and the founding philosophy is that people with disabilities are their own best advocates and serve as models of success to their peers. SAIL's bylaws mandate that 51% of the staff and board of directors have disabilities. SAIL is a non-residential private non-profit that works to remove physical and attitudinal barriers that prevent people with disabilities from using their rights, achieving independence, and participating fully in community life. SAIL serves people of all ages and disabilities including physical, cognitive, neurological, and mental health disabilities. Five core services are the foundation: Advocacy, Information & Referral, Independent Living Skills Training, Peer Support, and Transition.

'Consumer' means any individual with a significant disability who is eligible for independent living (IL) services under 34 CFR 364.40(a) and is currently receiving or has been provided with any IL service(s) under the program.

2. History (including year started)

Southeast Alaska Independent Living is a 501(c) (3) non-profit agency founded in 1990 and incorporated in 1993 to provide a wide range of services for SE Alaskans with disabilities.

SAIL has grown from a staff of 4 serving some 35 consumers (the people we serve) to twenty-seven years later, a staff of nearly 30 serving more than 1,100 Independent Living consumers plus hundreds of additional community members. Over these twenty-seven years, SAIL has taken on many exciting and innovative projects. We've been a leader, championing coordinated transportation, housing, employment, and inclusive communities. We've touched many lives over the years in a positive—and sometimes profound—way.

3. Regional Profile and Population Served (regional population; growth projection)

SAIL serves all persons with disabilities regardless of gender, age, race, sexual orientation, income, or disability type. SAIL offers services throughout the Southeast region of Alaska, from the northern-most community of Yakutat, southward to the communities of Ketchikan and Metlakatla, and all the communities in-between.

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Communities	Total population*	(A) Age 65+**	(B) Pop. with disability***	SAIL consumers ****
<i>SAIL:</i>				
Haines	2,516	345	317	95
Juneau/Douglas	31,986	2,635	3,774	421
Ketchikan	13,739	1,365	2,006	323
Sitka	8,532	1,008	1,041	143
Remaining service area	15,600	1,797	2,964	127
Total SAIL service area	72,373	7,150	10,109	1,109

*2019 population estimates by census region, State of Alaska Department of Labor

**2010 U.S. Census

*** Based on % of population w/ a disability, US Census Bureau

**** SAIL FY20 consumer numbers from MiCIL, a MIS created for collecting CIL data

The Americans with Disabilities Act (ADA), defines a disability as a physical or mental impairment that substantially limits one or more major life activities. A disability can be physical, mental, emotional, cognitive or sensory as well as permanent or temporary.

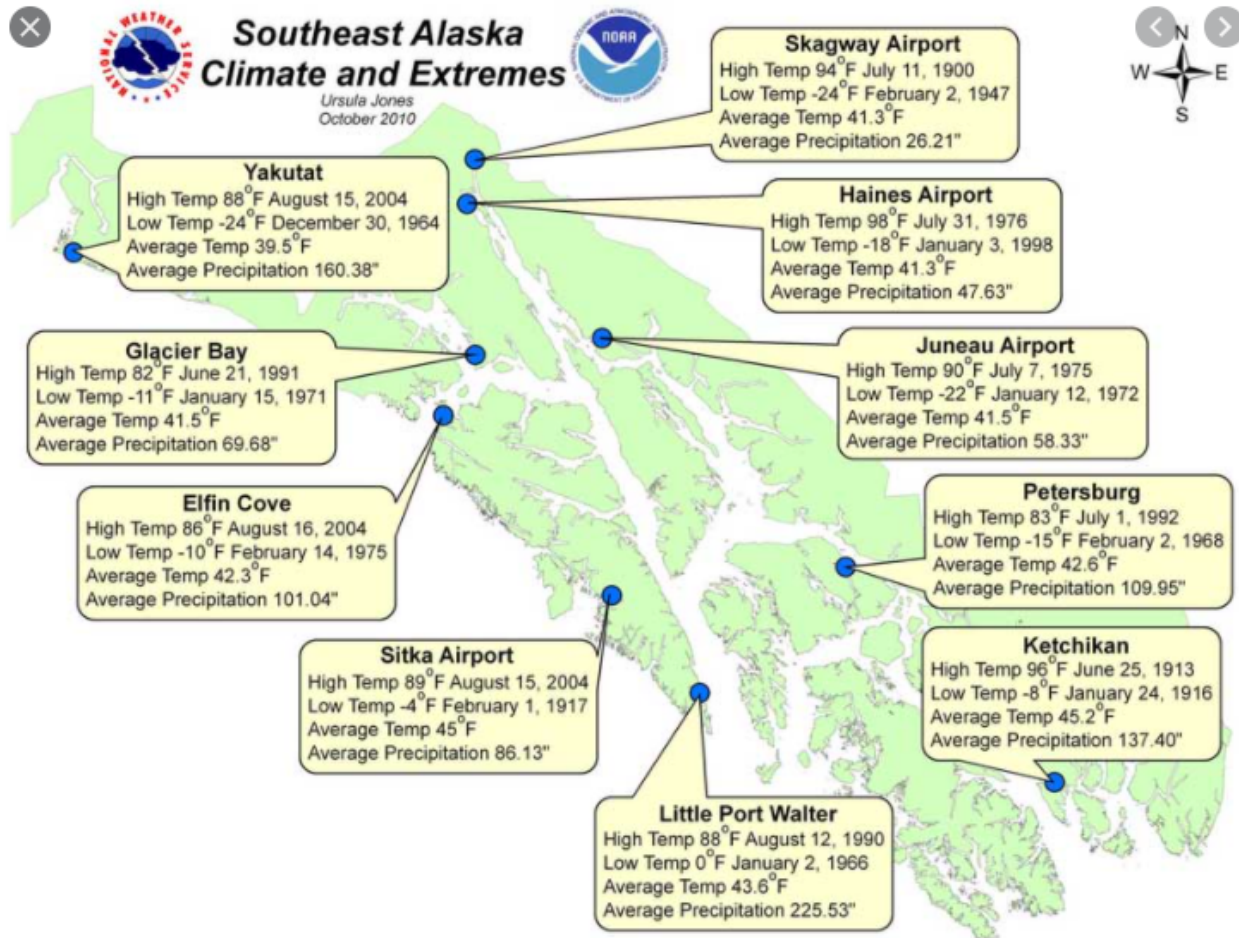
4. Service area

SAIL maintains offices in Juneau, Haines, Ketchikan, Sitka, and Klawock and is responsible for IL service delivery throughout a region that spans 32 communities over 32,000 square miles (approximately the size of South Carolina). The region is home to more than 10,000 individuals who experience disabilities. Only three of the communities in SAIL's service area – Skagway, Haines, and Hyder – are connected to the continental road system; even the state capital of Juneau, home to approximately half of the region's population, can only be accessed by boat or airplane.



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All offices are ADA compliant and located for ease of consumer access.

Governing body make-up

Board of Directors

ARTICLE II (Bylaws)

BOARD OF DIRECTORS

Section 2.1. General Powers. The business affairs of SAIL shall be managed by the Board of Directors.

Section 2.2. Number, Classification and Qualifications. The number of directors of SAIL shall be a minimum of five (5) and not more than eleven (11). Fifty-one (51) percent of the Board of Directors must be persons with a disability who are knowledgeable about independent living programs and services. The directors shall be divided into two classes of four directors each and one class of three directors, with the term of office of the first class to expire at the first annual meeting of shareholders after their election, that of the second class to expire at the

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second annual meeting after their election, and that of the third class to expire at the third annual meeting after their election. At each annual meeting after the classification, the number of directors equal to the number in the class whose term expires at the time of the meeting shall be elected to hold office until the third succeeding annual meeting. Further, at least three directors shall be residents of Juneau, Alaska and of these at least two must be officers.

2.3 Job Description. Existing directors will annually review the current board approved job description and will reaffirm their commitment by signing the current job description. New members will agree to the currently approved job description and affirm that agreement by signing the job description before joining the board.

Section 2.3.a. Each director is required to make a significant annual financial contribution to SAIL consistent with the personal circumstances of the director.

Section 2.4. Tenure. Each director shall hold office until the expiration of their term as defined in Section 2.2 of this article or by virtue of the director's resignation, death or removal. No member may serve more than two (2) full three terms.

Section 2.5. Regular Meetings. A regular meeting of the Board of Directors shall be held monthly with at least three (3) day notice to the Directors. The Board of Directors shall provide, by resolution, the time and place for the holding of meetings without notice other than such resolution.

Section 2.6. Special Meetings. Special meetings of the Board of Directors may be called by or at the request of any officer, or any two directors. The person or persons authorized to call special meetings of the Board of Directors may fix any place as the place for holding any special meeting of the Board of Directors called by them.

Section 2.7. Notice. Notice of any special meeting shall be given at least three (3) days in advance by mail, telephone, e-mail, or facsimile. Any director may waive notice of any meeting. The attendance of a director at a meeting shall constitute a waiver of notice of such meeting, except where a director attends a meeting for the express purpose of objecting to the transaction of any business because the meeting is not called or convened lawfully. Neither the business to be transacted nor the purpose of any regular or special meeting of the Board of Directors need be specified in the notice or waiver of notice of such meeting.

Section 2.8. Annual Meeting. An annual meeting of SAIL and the Board of Directors shall be held each year for the purpose of electing directors and officers and for the transaction of such other business as may come before the meeting. Prior to the annual meeting written notice shall be given to all SAIL consumers as to meeting time, place and purpose. Nominations for

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Board vacancies will be requested and the nominating committee, which shall be appointed for the purpose of nominating candidates, will consider all eligible nominations.

Section 2.8. Quorum. A majority of the number of director positions authorized and filled shall constitute a quorum for the transaction of business at any meeting of the Board of Directors, but if less than such majority is present at a meeting, a majority of the directors present may adjourn the meeting from time to time without further notice.

Section 2.9. Manner of Acting. The act of the majority of the directors present at a meeting at which a quorum is present shall be the act of the Board of Directors. Any action required or permitted to be taken by the Board of Directors may be taken without a meeting if all the members of the Board consent, in writing, to the action and the consents are filed with the minutes of the meeting. The Board of Directors may by general resolution delegate to committees of their own number, or to officers of SAIL, such powers as they may see fit. All meetings of the Board of Directors are open to the public, except that executive session may be convened from time to time when, at the discretion of the Board, it is necessary to protect or further the best interests of SAIL or to protect consumer or employee confidentiality.

Note: New board members are elected by sitting board members, after recommendation from the Board Development Committee. The board makes great efforts to ensure diversity in members, not only regarding disability. This is done through board recruitment in an effort for the board to reflect the consumers served. Currently, the board has a wide range of ages and disabilities and a balance of male and female. The seven member board currently includes one Alaskan Native and one individual who identifies as Black. The board actively seeks racial diversity reflective of regional demographics.

SAIL BOARD OF DIRECTORS (signed annually) **Job Description**

Rules & Responsibilities:

1. Define and oversee the mission of SAIL and keep it relevant to the needs of our community
2. Approve programs and services and monitor their effectiveness
3. Establish policies which provide strategic guidance to the organization and the Executive Director
4. Ensure financial solvency and help raise resources
5. Select, support and evaluate the Executive Director
6. Ensure continuous board improvement

As a member of this board, I commit to:

- Attending a minimum of seventy percent of board meetings per year

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- Participating in board retreats
- Participating in at least one board training event and an annual evaluation to identify ways in which our board can improve its performance
- Serving on at least one board committee (standing or ad hoc)
- Participating in at least one fund raising event
- Making a significant annual financial gift to SAIL consistent with my personal circumstances
- Holding SAIL to a high standard of performance and actively helping to make it a world class organization
- Understand my roles and responsibilities and becoming sufficiently knowledgeable about SAIL and its operations to make informed decisions
- Reading the materials sent to the board and coming prepared to board and committee meetings
- Asking for clarification on any matters or material that I do not understand before making a decision
- Listening carefully to other board members and staff with an open mind and an objective perspective
- Actively work towards those decisions and solutions that are in SAIL's best interests (speaking with one voice)
- Respecting the confidentiality of the board's business

I agree to be informed about and to observe the following board policies in our manual:

- Avoidance of conflict of interest
- Equal opportunity and avoidance of discrimination
- Enrollment in board liability insurance program

Signed: _____ Date: _____

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C. Notice to the Public/Public Participation Plan

Notifying the Public of Rights under Title VI

Southeast Alaska Independent Living, Inc. (SAIL) posts Title VI notices on our agency’s website, in public areas of our agency, and on our vehicles and/or the vehicles we lease to taxi companies.

The SAIL website, www.sailinc.org says:

SAIL empowers seniors and people with disabilities by providing services and information to support you (our consumers) in making choices that will positively affect your independence and productivity in society. SAIL serves all seniors and people with physical and mental disabilities regardless of race, national origin, color, religion, age, marital status, sexual preference, gender and or income. To find out more about SAIL’s nondiscrimination obligations or to file a complaint, please call SAIL at 1-800-478-7245 and ask for the Executive or Deputy Director.

The notices in the taxi’s SAIL lease say:

“Juneau Taxi and Tours/Yellow Cab, Ketchikan Cab provides its services without regard to race, color, or national origin. To find out more about SAIL’s nondiscrimination obligations or to file a complaint, please call us at (907) 586.4920 (Juneau) or (907) 225.4735 (Ketchikan).

5. Monitoring/Documenting Title VI Complaints/Investigations

Complaints will be entered and tracked in SAIL’s 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.

SAIL operates its programs and services without regard to race, color, or national origin, in accordance with Title VI of the Civil Rights Act of 1964.

D. Procedure for Filing a Title VI Complaint

**Title VI
Complaint Form
*ATTACHMENT 1***

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Title VI Procedures

Title VI of the 1964 Civil Rights Act requires that “No person in the United States shall, on the grounds 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.”

Any person who believes that he/she has been aggrieved by an unlawful discriminatory practice on the basis of race, color or national origin may file a complaint by completing and submitting SAIL the Title VI Complaint form.

How do you file a complaint?

You may download the SAIL Title VI Complaint Form at www.sailinc.org or request a copy by writing or phoning SAIL @ 3225 Hospital Drive, Suite 300, Juneau, AK 99801 or calling 907-586-4920 or 1-800-478-7245.

You may file a signed, dated and written complaint no more than 180 days from the date of the alleged incident. The complaint should include:

- Your name, address and telephone number. (See Question 1 of the Complaint Form)
- How, why, and when you believe you were discriminated against. Include as much specific, detailed information as possible about the alleged acts of discrimination, and any other relevant information. (See Questions 7, 8, 9, and 10 of the Complaint Form)
- The names of any persons, if known, whom the Title VI officer could contact for clarity of your allegations. (See Question 11 of the Complaint Form)

Please submit your complaint form to address listed below:

Title VI Coordinator: Joan O’Keefe, Executive Director
SAIL, 3225 Hospital Drive, Suite 300, Juneau, AK 99801

How will your complaint be handled?

SAIL investigates complaints received no more than 180 days after the alleged incident. SAIL will process complaints that are complete. Once a completed complaint is received, SAIL will review it to determine if SAIL has jurisdiction. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by SAIL.

SAIL will generally complete an investigation within 90 days from receipt of a completed complaint form. If more information is needed to resolve the case, SAIL may contact the complainant. Unless a longer period is specified by SAIL the complainant will have ten (10) days from the date of the letter to send requested information to the SAIL investigator assigned to the case.

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If a SAIL investigator is not contacted by the complainant or does not receive the additional information within the required timeline, SAIL may administratively close the case. A case may be administratively closed also if the complainant no longer wishes to pursue their case.

After an investigation is complete, SAIL will issue a letter to the complainant summarizing the results of the investigation, stating the findings and advising of any corrective action to be taken as a result of the investigation. If a complainant disagrees with SAIL's determination, he/she may request reconsideration by submitting a request in writing to SAIL's Executive Director within seven (7) days after the date of SAIL's letter, stating with specificity the basis for the reconsideration. The Executive Director will notify the complainant of his decision either to accept or reject the request for reconsideration within 10 days. In cases where reconsideration is granted, the Executive Director will issue a determination letter to the complainant upon completion of the reconsideration review.

A person may also file a complaint directly with the Alaska Department of Transportation and Public Facilities, at MS-2530, Anchorage, AK 99519-6900 or the Federal Transit Administration, at FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.

If information is needed in another language, contact SAIL at 907-586-4920 or 1-800-478-7245.

E. Title VI Complaints, Investigations, Lawsuits and Evidence of Agency Staff Title VI Training

Agency Title VI Complaint 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

No Complaints have been filed at this time regarding SAIL.

Documenting Evidence of Agency Staff Title VI Training

SAIL's staff are given Title VI training, and agency can answer affirmatively to all the following questions:

1. Are new employees made aware of Title VI responsibilities pertaining to their specific duties?

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2. Do new employees receive this information via employee orientation?
3. Is Title VI information provided to all employees and program applicants?
4. Is Title VI information prominently displayed in the agency and on any program materials distributed, as necessary?

F. Public Engagement Plan

Goal

The goal of the Public Engagement Plan is to have significant and ongoing public involvement, by all identified audiences, in the public participation process for major agency outreach efforts.

Objectives

- To understand the service area demographics and determine what non-English languages and other cultural barriers exist to public participation.
- To provide general notification of meetings and forums for public input, in a manner that is understandable to all populations in the area.
- To hold public meetings in locations that are accessible to all area stakeholders, including but not limited to minority and low income members of the community.
- To provide methods for two-way communication and information and input from populations which are less likely to attend meetings.
- To convey the information in various formats to reach all key stakeholder groups.

Identification of Stakeholders

Stakeholders are those who are either directly or indirectly affected by an outreach effort, system or service plan or recommendations of that plan. Stakeholders include but are not limited to the following:

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- Board of Directors – the governing board of the agency. The role of the Board is to establish policy and legislative direction for the agency. The Board defines the agency’s mission, establishes goals, and approves the budget to accomplish the goals.
- Agency consumers who receive transportation services either directly from a SAIL staff member during the course of business or from a taxi vendor SAIL leases vehicle to
- Minority and low income populations, including limited English proficient persons
- Local jurisdictions and other government stakeholders
- Private businesses and organizations
- Employers
- Partner agencies

Elements of the Public Engagement Plan

It is necessary to establish a public participation plan that includes an outreach plan to engage minority and limited English proficient (LEP) populations.

Elements of the Public Engagement Plan include:

1. Public Notice

- a. Official notification of intent to provide opportunity for members of the general public to participate in public engagement plan development, including participation in open Board/council meetings.

2. Public Engagement Process/Outreach Efforts:

- a. Public meetings
- b. Open houses
- c. Monthly board meetings
- d. Annual Meeting
- e. Public hearings on transportation (hosted by local municipal governments in partnership with local coordinated transportation providers, including SAIL)
- f. Surveys
- g. Services for the Disabled (Notices of opportunities for public involvement include contact information for people needing these or other special accommodations.)

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Events such as public meetings and/or open houses are held at schools, churches, libraries, other non-profit locations, or SAIL offices which are easily accessible to public transit and compliant with the Americans with Disabilities Act.

3. Public Comment

- a. Formal public comment periods are used to solicit comments on major public involvement efforts around an agency service or system change.
- b. Comments are accepted through various means:
 - i. Dedicated email address.
 - ii. Website.
 - iii. Regular mail.
 - iv. Forms using survey tools for compilation.
 - v. Videotaping.
 - vi. Phone calls to Customer Service Center [phone]

4. Response to Public Input

All public comments are provided to the Board of Directors prior to decision making. A publicly available summary report is compiled, including all individual comments.

Title VI Outreach Best Practices

SAIL ensures all outreach strategies, communications and public involvement efforts comply with Title VI. SAIL's 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. Aligned with the above referenced communication tactics, SAIL provides the following:

- a. Title VI non-discrimination notice on agency's website.
- b. Services for Limited English Proficient persons. Upon advance notice, translators, including sign language interpreters for the Deaf, may be provided.

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FY21-FY24 Title VI Program Public Engagement Process

SAIL will conduct a Public Engagement Process for the FY21-FY24 Title VI Program.

SAIL will provide briefings to the Board of Directors.

SAIL will conduct a public comment period to provide opportunities for feedback on the FY21-FY24 Title VI Program.

Comments are accepted during the public outreach period via:

- a. Email
- b. Mail
- c. Phone
- d. In person
- e. Survey Tool

Summary of FY21-FY24 Public Outreach Efforts

As a Center for Independent Living SAIL is required to provide Outreach to unserved and underserved populations. In doing so, staff attends community meetings within our service area and often sit on committees or boards for an array of organizations and/or agencies.

In providing outreach to our communities we are in contact with School Counselors, teachers, administrators; Public Health Offices; English as Second Language Classes; social service coalitions; area churches; and more. SAIL staff spends hundreds of hours each year providing outreach to reach underserved and unserved populations.

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G. Language Assistance Plan

**Southeast Alaska Independent Living, Inc. (SAIL)
Limited English Proficiency Plan**

This limited English Proficiency (LEP) Plan has been prepared to address SAIL's 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, titled "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 understand English is a type of national origin discrimination. It directs each federal agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discriminations do not take place. This order applies to all state and local agencies which receive federal funds.

Service Area Description:

SAIL offers services in Southeast Alaska, a region that includes the northern-most community of Yakutat, southward to the communities of Ketchikan and Metlakatla, and all the communities in-between.

SAIL offers discounted transportation services through a taxi voucher program, to seniors and people with disabilities. This allows for discounted taxi fares to destinations chosen by the rider, e.g., doctor appointments, shopping, employment and recreation.

SAIL also offers transportation to consumers taking part in adaptive and inclusive recreation activities we provide through our Outdoor Recreation and Community Access programs.

SAIL has developed this LEP Plan to help identify reasonable steps for providing language assistance to persons with limited English proficiency who wish to access services provided by SAIL. As defined in 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, and the ways in which assistance may be provided.

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Demographics of Communities Served by Census Region					
Community	Haines	Hoonah-Angoon	Juneau	Ketchikan	Petersburg
Population	2,530	2,148	31,974	13,901	3,266
Sex by %	50% Male 50% Female	53% Male 47% Female	51% Male 49% Female	51% Male 49% Female	52% Male 48% Female
Race by %	80% Caucasian 11% Alaska Native 3.6% Hispanic or Latino 1% Asian .06 Black	49% Caucasian 38% Native Alaskan 6% Hispanic or Latino 2% Black 1% Asian,	69% Caucasian 12% Alaska Native 7% Asian 6% Hispanic or Latino 1.5% Black 1% Hawaiian, Pacific Islander	67% Caucasian 14% Alaska Native 8% Asian, 5.6% Hispanic or Latino 1% Black	75% Caucasian 11% Alaska Native 6% Hispanic or Latino 4% Asian, 2% Black 1% Hawaiian, Pacific Islander

Community	POW	Skagway	Sitka	Wrangell	Yakutat
Population	6,203	1,183	8,493	2,502	579
Sex by %	55% Male 45% Female	52% Male 48% Female	51% Male 49% Female	52% Male 48% Female	55% Male 45% Female
Race by %	46.5% Caucasian 42.6% Alaska Native 4% Hispanic or Latino 1.2% Asian .6% Black	86% Caucasian 6.7% Hispanic or Latino 5.5% Alaska Native 2.4% Asian .8% Black	66% Caucasian 15.7% Alaska Native 7.6% Asian 7.4% Hispanic or Latino 1% Black	69% Caucasian 16.7% Alaska Native 3.2% Asian 3% Hispanic or Latino .6% Black	41% Alaska Native 35% Caucasian 6% Asian 2% Black 1% Hawaiian, Pacific Islander

In order to prepare this plan, SAIL undertook the **four-factor LEP analysis** which considers the following factors:

Four Factor Analysis

1. The number and proportion of LEP persons eligible to be served or likely to be encountered in the service area:

A significant majority of people in the SAIL service area are proficient in the English language. In the SE region of Alaska, after English, Tagalong is the most common language, followed by Native American, primarily Tlingit. A few pockets of other languages, i.e., Thai. The cumulative total of individuals who do not speak English well is less than 3% of the population 5 years and older.

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2. Frequency of Contact by LEP Persons with SAIL's Services:

The SAIL staff reviewed the frequency with which office staff, dispatchers and drivers have, or could have, contact with LEP persons. To date, SAIL has, on average, no requests per month for an interpreter regarding transportation (other than Sign Language Interpreters).

LEP Staff Survey Form

SAIL is studying the language assistance needs of its riders so that we can better communicate with them if needed.

1. How often do you come into contact with passengers who do not speak English or have trouble understanding you when you speak English to them?

DAILY WEEKLY MONTHLY LESS THAN MONTHLY

2. What languages do these passengers speak?
3. What languages (other than English) do you understand or speak?
4. Would you be willing to serve as a translator when needed?

Frequency of Contact with LEP Persons

Frequency	Language Spoken by LEP Persons
Daily	
Weekly	
Monthly	
Less frequently than monthly	

3. The importance of programs, activities or services provided by SAIL to LEP persons:

Outreach activities, summarized in SAIL's Title VI Public Engagement Plan, include events such as public meetings and/or open houses held at schools, churches, libraries and other non-profit locations, and include specific outreach to LEP persons to gain under-standing of the needs of the LEP population, and the manner (if at all) needs are addressed.

Outside Organization LEP Survey

Organization: _____

1. What language assistance needs are encountered?

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2. *What languages are spoken by persons with language assistance needs?*
3. *What language assistance efforts are you undertaking to assist persons with language assistance needs?*
4. *When necessary, can we use these services?*

4. The resources available to SAIL and overall cost to provide LEP assistance:

Strategies for Engaging Individuals with Limited English Proficiency include:

1. Language line. Upon advance notice, translators can be provided.
2. Language identification flashcards.
3. Written translations of vital documents per request
4. One-on-one assistance through outreach efforts.
5. Website information.

As applicable: Based on our demographic analysis (Factor 1) SAIL has determined that no language group(s) within its service area meets criteria requiring written translated “vital documents” by language group(s).

SAIL will provide assistance and direction to LEP persons who request assistance.

Staff LEP Training

The following training will be provided to SAIL staff:

1. Information on SAIL’s Title VI Procedures and LEP responsibilities.
2. Description of language assistance services offered to the public.
3. Documentation of language assistance requests.

Monitoring and Updating the LEP Plan

The LEP Plan is a component of SAIL’s Title VI Plan requirement.

SAIL will update the LEP plan as required. At minimum, the plan will be reviewed and updated when it is clear that higher concentrations of LEP individuals are present in the SAIL service area. Updates include the following:

1. How the needs of LEP persons have been addressed.
2. Determine the current LEP population in the service area.

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3. Determine as to whether the need for, and/or extent of, translation services has changed.
4. Determine whether local language assistance programs have been effective and sufficient to meet the needs.
5. Determine whether SAIL's financial resources are sufficient to fund language assistance resources as needed.
6. Determine whether SAIL has fully complied with the goals of this LEP Plan.
7. Determine whether complaints have been received concerning SAIL's failure to meet the needs of LEP individual(s).

The plan will be monitored on an on-going basis by the Executive Director or designee to ensure compliance. Monitoring will include review of the plan quarterly, including discussion with program staff regarding questions or concerns as well as review at times that aspects of the plan are utilized by LEP persons to ensure accessibility.

H. Advisory Boards and Governing Body

- SAIL is a founding member of the Juneau and Ketchikan (Revilla Island) Coordinated Transportation Coalitions and remains active in both.
- SAIL has had representation on the Governor appointed Statewide Independent Living Council (SILC) for the past 7 years. SAIL Assistant Director, Tristan Knutson-Lombardo, currently represents the Alaska Independent Living Network on the SILC. Transportation goals and objectives are included in the Alaska State Plan for Independent Living.
- The SAIL Executive Director was the chair of the SILC transportation committee until committees were restructured; is a member of the Associated Programs for Rural Independent Living (APRIL) Transportation Committee; and was a member of the Governor's Public Transportation Advisory Board prior to its sunset.
- SAIL is a member of the Alaska Mobility Coalition.
- SAIL does not have any specific transportation related, non-elected planning boards, advisory councils or committees. Occasionally the duly elected SAIL board of directors may take up a transportation issue.

Table Depicting Membership of Board of Directors, By Race

Committee [examples]	Caucasia n	Latino	African American	Asian American	Native America n	Total
Board of Directors	6		1		1	100%

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Description of efforts made to encourage minority participation on committees:

Our Board of Directors is composed of a minimum of 51% of people with disabilities. All members of the SAIL Board of Directors are elected. The board strives to look like the people we serve, in disability type, geographic distribution, and ethnicity. Targeted outreach is spearheaded by the board development committee who maintains a matrix profiling each board member to compare to regional and agency consumer demographics.

Sub-recipient Assistance

SAIL leases ramp equipped taxi cabs in Juneau and Ketchikan. SAIL has signed agreements with both taxi vendors that were vetted and approved by the Alaska Department of Transportation and Public Facilities (ADOT&PF). SAIL monitors compliance of our sub-recipients.

Subrecipient Monitoring

SAIL leases ramp equipped taxis in Juneau and Ketchikan. SAIL has signed agreements with both taxi vendors that were vetted and approved by the Alaska Department of Transportation and Public Facilities (ADOT&PF). SAIL monitors compliance of our sub-recipients through maintenance logs, regular communication with owners of the taxi companies as well as rider feedback.

Equity Analysis of Facilities

SAIL has not constructed any storage facilities, maintenance facilities, or operations centers in the last three years.

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Attachment 1

TITLE VI COMPLAINT FORM

"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."

If you feel that you have been discriminated against in the provision of transit 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:

Joan O'Keefe
3225 Hospital Drive, Suite 300, Juneau, AK 99801
info@sailinc.org
888-521-4869

1. Complainant's Name:		
a. Address:		
b. City:	State:	Zip Code:
c. Telephone (Home <input type="checkbox"/> or Cell <input type="checkbox"/>) Please include area code ()	Telephone Number (Work) ()	
d. Electronic Mail Address:		
Do you prefer to be contacted via this email address? <input type="checkbox"/> Yes <input type="checkbox"/> No		
2. Accessible Format of Form Needed? <input type="checkbox"/> Large Print <input type="checkbox"/> Audio Tape <input type="checkbox"/> TDD		
<input type="checkbox"/> Other (please specify):		
3. Are you filing this complaint on your own behalf? <input type="checkbox"/> Yes If YES, please go to Question 7		
<input type="checkbox"/> 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:

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11. Please list any and all witnesses' names and phone numbers/contact information. *Use the back of this form or separate pages if additional space is required.*

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)

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- 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. 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