



Title VI Plan Section 5310 Grantee

Adopted: September 22, 2020

Adopted by: Paladin, Inc.
Board of Directors

New Policy: October 1, 2020

Chairperson
Name/Title Michael Breakey, Chairperson

Signature: _____ Date: _____

Policy Statement

The Section 5310 grantee, Paladin, Inc., as a recipient of Federal Transit Administration (FTA) grant dollars either directly from FTA or through the Indiana Department of Transportation (INDOT) will comply with the Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the U.S. Department of Transportation implementing regulations.

Title VI Plan Elements

Paladin's Title VI plan includes the following elements:

1. Evidence of Policy Approval
2. Notice to the Public
3. Compliant Procedure
4. Complaint Form
5. List of transit related Title VI Investigations. Complaints and Lawsuits
6. Public Participation Plan
7. Language Assistance Plan
8. Minority Representation Table and Description

Note: Additional materials will be attached, if required.

PUBLIC NOTICE OF RIGHTS UNDER TITLE VI OF THE CIVIL RIGHTS ACT OF 1964



Paladin, Inc. 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. Any person who believes he or she has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with Paladin, Inc.

For more information on Paladin, Inc. civil rights plan and the procedures to file a complaint contact the Corporate Compliance Officer at 219-874-4288 x1138 or email compliance@paladin.care. You may also visit our office at 4315 East Michigan Blvd., Michigan City, Indiana 46360.

A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint at the address below.

Federal Transit Administration
Office of Civil Rights
Attention: Title VI Program Coordinator
East Building, 5th Floor – TRC
1200 New Jersey Avenue, SE
Washington DC 20590

If information is needed in another language or alternate format, contact Paladin, Inc. at 219-874-4288, extension 1138 or email compliance@paladin.care Subject: Title VI

Paladin Inc.'s Notice to the Public is posted in the following locations:

- Agency website: www.paladin.care
- Front office bulletin board
- Transportation Office
- Inside transportation vehicles
- Other: Hospitals and physicians offices as appropriate

PALADIN PROGRAM POLICIES

POLICY: Complaints of Discrimination

EFFECTIVE DATE:

REVISED DATE:

POLICY: 800.07

DISTRIBUTION: All Administrative Policy & Procedure Manual Folders

Purpose

The purpose of this policy is to provide procedures for the receipt, tracking, resolving, and responding to Title VI and ADA discriminatory complaints with regard to Paladin's transportation service. Additionally, this policy will address record-keeping and reporting requirements.

Complaint Process

In the event Paladin has a complaint regarding the provision (or non-provision) of transportation services where a person believes they or a specific group of persons has been subjected to discrimination prohibited by Title VI or the ADA, the complaint shall be handled as follows:

- The individual or representative should first contact Paladin to attempt to settle the complaint at:

Paladin
ATTN: Corporate Compliance Officer
4315 E Michigan Blvd.
Michigan City, IN 46360
compliance@paladin.care

This complaint process and form are available at www.paladin.care.

- Complaint must be reported no later than one hundred eighty (180) days after the alleged occurrence.
- Alternative formats are available and individuals may submit a request to Paladin for a copy of this policy and complaint form to be provided in a specified alternative format.
- If the complaint is resolved by Paladin management, Paladin will retain a written account of the resolution, sending a summary letter to the complainant.

- If Paladin management cannot resolve the complaint, a written account of the complaint will be forwarded to Paladin’s Board of Directors (BOD). The BOD will appoint a Complaint Resolution Committee (CRC) that will address all complaints that remain unresolved by Paladin management. Upon receipt, the Committee will review the complaint and attempt to resolve it. All parties agree that the decision of the CRC will be considered a final resolution.

After Paladin investigates the complaint, a decision will be rendered in writing to the complainant. Paladin will either issue a Letter of Closure or Letter of Finding.

- a. Letter of Finding – This letter will summarize the complaint, any interviews conducted regarding the complaint, and explains what actions will be taken by Paladin to address the complaint.
- b. Letter of Closure – This letter will explain why Paladin has determined that the complaint does not merit accommodation under the ADA or Title VI and that complaint will be closed.

Records

All complaints will be documented and placed in a file marked “Complaint File”.

Records will be maintained by Paladin’s Corporate Compliance Officer or designee.

- Records regarding complaints will be retained for a minimum of one (1) year.
- A summary of complaints and communications for each complaint will be retained for a minimum of five (5) years.

The FTA permits the use of a single complaint form for receipt of Title VI and ADA complaints, and Paladin will distinctly categorize internal and external communications to appropriately identify ADA complaints. The complaint form will be evaluated annually for compliance.

Appeals

It is Paladin’s goal to assure quality service to all persons. Should a complainant desire to file a complaint directly with the FTA, access further information, or to file an appeal, the following may be contacted:

Federal Transit Administration
Office of Civil Rights
Attention: Complaint Team
East Building, 5th Floor – TCR
1200 New Jersey Avenue, SE
Washington, DC 20590
(888) 446-4511

(Appendix 4) – Consolidated Civil Rights Complaint Form

Section I:

Name:

Address:

Telephone (Home):

Telephone (Work):

Electronic Mail Address:

Accessible Format Requirements?

Large Print

Other

Audio Tape

TDD

Section II:

Are you filing this complaint on your own behalf?

Yes*

No

*If you answered "yes" to this question, go to Section III.

If not, please supply the name and relationship of the person for whom you are complaining:

Please explain why you have filed for a third party:

Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.

Yes

No

Section III:

I believe the discrimination I experienced was based on (check all that apply):

Race Color National Origin Other: Gender Age Disability

Date of Alleged Discrimination (Month, Day, Year): _____

Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.

Section IV

Have you previously filed a Title VI complaint with this agency?

Yes

No

Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?

Yes No

If yes, check all that apply:

Federal Agency:

Federal Court State Agency

State Court Local Agency

Please provide information about a contact person at the agency/court where the complaint was filed.

Name:

Title:

Agency:

Address:

Telephone:

Section VI

Contact person:

Title:

Telephone number:

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

Signature and date required below

Signature

Date

Please submit this form in person at the address below, or mail this form to:

Corporate Compliance Officer

Paladin, Inc.

4315 E Michigan Blvd.

Michigan City, IN 46360

Appendix 5 – List of Transit Related Title VI Investigations, Complaints and Lawsuits

Check One:

There have been NO investigations, complaint and/or lawsuits filed against us during the report period April 1, 2017 through August 31, 2020.

There have been investigations, complaints and/or lawsuits filed against us. See list below.

	Date Month, Day, Year	Summary (include basis of complaint; race, color, or national origin)	Status	Action(s) Taken
Investigations				
1.				
2.				
Lawsuits				
1.				
2.				
Complaints				
1.				
2.				

Appendix 6 – Public Participation Plan

Strategies and Desired Outcomes

To promote inclusive public participation, the Paladin, Inc. will use its resources available to employ the following strategies, as appropriate:

- ✓ Provide for continuous engagement by the public.
- ✓ Select accessible and varied meeting locations and times
- ✓ Employ different meeting sizes and formats

Documented Public Outreach

The direct public outreach and involvement activities conducted by the Paladin, Inc. are summarized in the table below. Efforts include meetings, survey, focus groups, etc.

Event Date	Paladin Staff	Event	Date Publicized and Communication Method (such as public notice, posters, social media)	Outreach Method (meetings, Focus Group, Survey, etc.)	Notes
September 2020	Corporate Compliance Officer, Board of Directors	Review and update current plan	October 1, 2020		Transportation Manager continues outreach to new customers.
Quarterly	Transportation Manager	LaPorte County Transportation Advisory Committee		Shared Resource Meeting	Paladin's Transportation Manager chairs this committee and Paladin hosts quarterly meetings.
October 2020	Corporate Compliance Officer	Information updated on paladin.care	As updated		
October 2020	Facility Coordinator	Updated information made available at corporate office	As updated		
June 2021	Corporate Compliance Officer	Transportation Satisfaction Surveys	Annually in June	Survey provided to all individuals receiving Transportation services.	

March 2021	Senior Leadership Team	Resource Fair	Posted on social media March 2021	Fair	Paladin staff was present to share information on available services. Outside vendors were also invited.
Bi-Monthly	Designated Paladin staff and community members	Human Rights Committee	Dates are provided to all members.	Resource Meeting	
Monthly	Senior Leadership Team and other Paladin staff	WIMS Radio Spotlight		Media	A representative of Paladin is on the morning show to discuss current events and service offerings.

(Appendix 7) Language Assistance Plan

“Paladin, Inc. identifies client needs at various stages of the service plan. Those needs are met by matching them with the appropriate service. With regard to our elderly/disabled Transportation clients, language barriers would be determined at intake and a qualified interpreter would be found to assist.”

(Appendix 8) – Minority Representation Information

A. Minority Representation Table

The table below depicts **Paladin Inc.**'s two committees and councils related to transit: the grantee's Board of Directors and its Transportation Advisory Council.

Body	Caucasian	Hispanic	African American	Asian American	Native American
*Population	84.9%	6.9%	11.6%	.7%	0%
Board of Directors	99.0%	0%	1%	0%	0%
Transportation Advisory Council	75%	0%	25%	0%	0%

*LaPorte County Indiana US Census Bureau 2019

B. Efforts to Encourage Minority Participation

Paladin, Inc. understands diverse representation on committees, councils and boards results in sound policy reflective of its entire population. As such, PALADIN, INC. encourages participation of all its citizens. And beginning July 1, 2014 PALADIN, INC. began making efforts to encourage and promote diversity. To encourage participation on its boards and committees PALADIN, INC. will continue to reach out to community, ethnic and faith-based organizations to connect with all populations

Anti-Discrimination Notice

It is unlawful for the **Paladin, Inc.** to fail or refuse to provide services, access to services or activities, or otherwise discriminate against an individual because of an individual's race, color, religion, sex, sexual preference, national origin, disability, or veteran status.

Paladin, Inc. invites Board and council members to voluntarily self-identify their race/ethnicity in order for us to comply with FTA Title VI regulations. This information will be used according to the provisions of applicable federal and state laws, executive orders and regulations, including those requiring the information to be summarized and reported to the federal government for civil rights enforcement purposes.



Minority Representation Data Collection Form

Date:

Dear Member:

As PALADIN, INC. is a recipient of federal funds, we are required under Title VI of the Civil Rights statute to ascertain the racial/ethnic make-up boards and councils, etc.

Data from this section is used for statistical and reporting purposes. The information may be subject to disclosure under federal or state law or rule.

Race/Ethnicity – Self-identification (Optional)

If you choose to self-identify, please mark the **one box** describing the race/ethnicity category with which you primarily identify:

Asian or Pacific Islander: All persons having origins in any of the peoples of the Far East, Southeast Asia, the Indian subcontinent, or the Pacific Islands. This area includes, for example, China, Japan, Korea, the Philippine Islands and Samoa.

Black and/or African American (not of Hispanic origin): All persons having origins in any of the Black racial groups of Africa.

Hispanic: All persons of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture or origin, regardless of race.

American Indian or Alaskan Native: All persons having origins in any of the original peoples of North America, and who maintain cultural identification through tribal affiliation or community recognition.

Caucasian (not of Hispanic origin): All persons having origins in any of the original peoples of Europe, North Africa or the Middle East.

Note: The Minority Representation Data Collection Form is an optional tool for the sub recipient. Completed forms are not required to be submitted with the Title VI plan.