

# **Title VI Plan St. Louis Society for the Blind and Visually Impaired**

September 19, 2019

Prepared By: Laura Park-Leach, President and CEO

## I. Non-Discrimination Policy Statement

It is the policy of St. Louis Society for the Blind and Visually Impaired that no person shall on the grounds of race, color, national origin, sex, disability, or age, be excluded from participation in, be denied the benefits of, or be subjected to discrimination in any operation of St. Louis Society for the Blind and Visually Impaired as provided by Title VI of the Civil Rights Act of 1964 and related statutes.

This policy applies to all operations of St. Louis Society for the Blind and Visually Impaired including its contractors and anyone who acts on behalf of St. Louis Society for the Blind and Visually Impaired.

Prohibited discrimination may be intentional or unintentional. Seemingly neutral acts that have disparate impacts on individuals of a protected group and lack a substantial legitimate justification are a form of prohibited discrimination. Harassment and retaliation are also prohibited forms of discrimination.

Examples of prohibited types of discrimination based on race, color, national origin, sex, disability, or age include: Denial to an individual any service, financial aid, or other benefit; Distinctions in the quality, quantity, or manner in which a benefit is provided; Segregation or separate treatment; Restriction in the enjoyment of any advantages, privileges, or other benefits provided; Discrimination in any activities related to highway and infrastructure or facility built or repaired; and Discrimination in employment.

Title VI compliance is a condition of receipt of federal funds. The Title VI Coordinator is authorized to ensure compliance with this policy, Title VI of the Civil Rights Act of 1964, 42 U.S.C § 2000d and related statutes, and the requirements of 23 Code of Federal Regulation (CFR) pt. 200 and 49 CFR pt. 21.

Laura Park-Leach

Laura Park-Leach, President

9/19/19

Date

## II. Organization, Staffing, and Structure

President Laura Park-Leach is ultimately responsible for assuring full compliance with the provisions of Title VI of the Civil Rights Act of 1964 and related statutes and has directed that non-discrimination is required of all agency employees, contractors, and agents pursuant to 23 CFR Part 200 and 49 CFR Part 21.

The Title VI Coordinator is responsible for:

- Submitting a Title VI plan and annual reports on the agency's behalf;
- Developing procedures for the prompt processing and disposition of complaints;
- Investigating complaints, compiling a complaint log, and reporting to the Board of Directors, Missouri DOT, or FTA;
- Developing procedures for the collection and analysis of statistical data;
- Developing a program to conduct Title VI reviews of program areas;
- Conducting annual Title VI assessments of pertinent program areas;
- Developing Title VI information for dissemination;
- Establishing procedures for resolving deficiency status and writing the remedial action agreed to be necessary.

### ORGANIZATIONAL CHART

BOARD OF DIRECTORS  
EXECUTIVE COMMITTEE  
MINORITY ADVISORY BOARD  
PRESIDENT & CEO  
STAFF

(Transportation, Low Vision, Vision Rehabilitation Therapy,  
Orientation and Mobility, Assistive Technology, Social Work, Children's Services)

### III. Title VI Complaint Procedures

#### Discrimination Complaint Procedure for St. Louis Society for the Blind and Visually Impaired

Federal law prohibits discrimination on the basis of race, color, national origin, age, sex, or disability in any St. Louis Society for the Blind and Visually Impaired program or activity. This prohibition applies to all areas of St. Louis Society for the Blind and Visually Impaired its contractors, consultants, and anyone else who acts on behalf of St. Louis Society for the Blind and Visually Impaired.

Federal law requires that St. Louis Society for the Blind and Visually Impaired investigate, track, and report discrimination complaints. Complaints must be filed in writing and will be investigated within sixty days of submission. If you need assistance to file your complaint or need interpretation services, please contact President Laura Park-Leach.

#### Who is eligible to file a complaint?

Anyone who believes they have been excluded from participation in, denied the benefits of, or otherwise subjected to discrimination under any St. Louis Society for the Blind and Visually Impaired program or activity because of their race, color, national origin, age, sex, or disability may file a complaint.

Discrimination includes lack of access, harassment, retaliation and disparate impacts from a program or activity. Harassment includes a wide range of abusive and humiliating verbal or physical behaviors. Retaliation includes intimidating, threatening, coercing, or engaging in other discriminatory conduct against anyone because they filed a complaint or otherwise participated a discrimination investigation.

#### How do you file a complaint?

Complaints must be filed in writing within 180 days from the last date of the alleged discrimination. However, contact President Laura Park-Leach if you believe your complaint may fall outside this deadline.

Reasonable efforts will be made to assist persons with disabilities, non-English speakers, and others unable to file a written complaint. For assistance in filing a complaint, please contact President Laura Park-Leach.

Complaints may be submitted via mail, email, fax or in person to:

Laura Park-Leach, President  
St. Louis Society for the Blind and Visually Impaired  
8770 Manchester Road



St. Louis, MO 63144  
[lparkleach@sbsbvi.org](mailto:lparkleach@sbsbvi.org)  
O: 314-301-7307  
M: 314-968-9000  
F: 314-968-9003

Complaints may also be filed directly with the following agencies:

Missouri Department of Transportation  
105 W. Capitol Avenue  
Jefferson City, MO 65102  
1-888-831-6277

Federal Transit Administration  
East Building  
1200 New Jersey Avenue, SE  
Washington, DC 20590  
202-366-4043

#### What happens after a complaint is filed?

Title VI complaints must be investigated within sixty days. Investigating a complaint includes interviewing all parties involved and key witnesses. The investigator may also request relevant information such as books, records, electronic information, and other sources of information from all involved parties. You may specify if there is a particular individual or individuals that you feel should not investigate your complaint due to conflict of interest or other reasons.

In some cases, complaints will be forwarded to either the Missouri Department of Transportation or the Federal Transit Administration for investigation. If your complaint is forwarded to one of these agencies, you will be provided the name and contact information of the employee handling your complaint.

Federal law prohibits retaliation against individuals because they have filed a discrimination complaint or otherwise participated in a discrimination investigation. Any alleged retaliation should be reported in writing to the investigator.



Where did the discrimination occur?

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Dates and times discrimination occurred?

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Were there any other witnesses to the discrimination?

Name	Organization/Title	Work Telephone	Home Telephone

How would you like to see this situation resolved?

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Have you filed your complaint, grievance, or lawsuit with any other agency or court?

Who \_\_\_\_\_ When \_\_\_\_\_  
Status (pending, resolved, etc.) \_\_\_\_\_ Result, if known \_\_\_\_\_  
Complaint number, if known \_\_\_\_\_

Do you have an attorney in this matter?

Name \_\_\_\_\_ Phone \_\_\_\_\_  
Address \_\_\_\_\_ City \_\_\_\_\_ Zip \_\_\_\_\_

Signed \_\_\_\_\_ Date \_\_\_\_\_

**V. Data Collection**

Program Area	Type of Data Collected & Process for Collecting	Intended Outcome of Data Analysis (i.e. Title VI Purpose for Collecting the Data)
Vision Rehabilitation Program	Information is collected by the social worker during the intake process on all clients who are visually impaired. It is stored in a database called Apricot.	Queries are developed within Apricot to analyze the Society's success in meeting the needs of the community and to determine if there have been any significant changes to which the staff should respond.
		In 17/18, 17.9% of our clients represented minorities. Our goal is to increase that percent through the Minority Advisory Board. 83.4% of our clients are seniors over the age of 60.



## **VI. Public Participation**

The Society for the Blind and Visually Impaired has an objective to “Determine the activities that would assist in reaching priority populations such as older adults and communities of color”. As such, we have established a Minority Advisory Board which will have its first quarterly meeting on September 24, 2019. This Board has the purpose of:

- Identifying potential sources of referrals and making direction connections when appropriate.
- Identifying other potential community partners and providing feedback on outreach tools and efforts.
- Identifying and referring potential funding sources that lead to impacts on Society’s services to diverse populations.

We have recently reached out to the Asian American Chamber of Commerce, India Association of St. Louis, and the Hispanic Chamber of Commerce seeking new members for the Minority Advisory Board.

We conduct outreach to all local eye practices and other community partners who have similar interests in our target population. The agency currently sends 3800 newsletters into the community on a quarterly basis. We have a Facebook page and are in the process of updating our website which will include the ability to translate information into other languages. When requested, we can provide all our information digitally, in large print, or Braille so that our target audience can read it. The Society provides public education on demand such as Fall Prevention Awareness Day in N. St. Louis City aimed at seniors, schools, doctor’s offices, Lions Clubs, and health fairs.

All clients are invited to participate in a survey following clinic services.

## VII. Notice of Rights

The following notice is available in the office of the Society for the Blind and Visually Impaired at the front desk, in each of the vehicles, and on the website. Upon request, it will be provided in a digital format, large print, Braille, or in other languages.

### Your Rights Against Discrimination under Title VI of the Civil Rights Act of 1964

St. Louis Society for the Blind and Visually Impaired operates its programs and services without regard to race, color, national origin, sex, age, and disability. Anyone who believes they have been excluded from participation in, denied the benefits of, or otherwise subjected to discrimination under any St. Louis Society for the Blind and Visually Impaired program or activity because of their race, color, national origin, age, sex, or disability may file a discrimination complaint with St. Louis Society for the Blind and Visually Impaired or the Missouri Department of Transportation.

To file a Title VI discrimination complaint, contact:

Laura Park-Leach, President  
St. Louis Society for the Blind and Visually Impaired  
8770 Manchester Road  
St. Louis, MO 63144  
[lparkleach@sbsbvi.org](mailto:lparkleach@sbsbvi.org)  
O: 314-301-7307  
M: 314-968-9000  
F: 314-968-9003

Missouri Department of Transportation  
105 W. Capitol Avenue  
Jefferson City, MO 65102  
1-888-831-6277

  
\_\_\_\_\_  
Mike McKinnis  
Board of Directors Chair

  
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Date