



Flat Rock

Restoring Hope. Transforming Lives. Living Faith.

**Flat Rock Homes, Flat Rock Care Center and Flat Rock Community Services
Federal Transit Administration - Title VI Program Plan
for the
Flat Rock Transportation Services Program**

Plan Effective Date: January 30, 2026 (update)

Title VI Contact Information:

Contact: President/CEO or designee

Contact Phone Number: 419-483-7330

Contact Email: kkilgo@flatrockhomes.org

Mailing Address: Flat Rock Homes, PO Box 1, Flat Rock, OH 44828

Website: <https://www.flatrockhomes.org/>

Language Interpretation Assistance:

Interpretation Services Provided By): TBD

For Interpreter Services Individuals Will Call: TBD

Title VI Plan Table of Contents

The Flat Rock Transportation Services Program Title VI plan includes the following elements:

- Annual Certifications & Assurances
- Policy Statement
- Notice to the Public
- Complaint Procedure
- Complaint Form
- List of transit related Title VI Investigations, Complaints and Lawsuits
- Public Participation Plan
- Language Assistance Plan
- Minority Representation Table and Description
- Appendix A – Governing Board Adoption Resolution or Proof
- Appendix B – Annual Certification & Revision Log
- Appendix C – Notice to the Public (English Version)
- Appendix D – Notice to the Public (Spanish Example)
- Appendix E – Complaint Procedures
- Appendix F – Complaint Form
- Appendix G – Investigations, Complaints, Lawsuits
- Appendix H – Public Participation
- Appendix I – LEP Encounters
- Appendix J – “I Speak” Cards

Section 1: Annual Certifications and Assurances

In accordance with 49 CFR Section 21.7(a), every application for financial assistance from FTA must be accompanied by an assurance that the applicant will carry out the program in compliance with Title VI regulations. This requirement is fulfilled when the applicant/recipient submits its annual certifications and assurances. Flat Rock will remain in compliance with this requirement by annual submission of certifications and assurances as required by ODOT. Flat Rock executed initial Certifications and Assurances to the FTA in May 2020.

Section 2: Title VI Policy Statement

Nature of the Program: Currently, Flat Rock's Transportation Services Program is an "open door" program (as defined by the Ohio Department of Transportation [ODOT] program) providing services to Flat Rock's residents and consumers as part of Flat Rock Care Center's intermediate care facility's operations and Flat Rock Community Services' residential services and community programs (i.e. Adult Day Support [ADS], Community Integration, Non-medical Transportation [NMT], and drop-in Homemaker and Personal Care Services [HPC]). Flat Rock may occasionally offer transportation to others who may need transportation and whose needs we can meet. Flat Rock provides "through door" transportation as defined by the ODOT program. Flat Rock is responsible for meeting 100% of all transportation needs of its residents and consumers as part of our operations. There are no fares charged, no routes, and no schedules. Services are provided as needed and contracted and generally include transportation "through door" to/from the individual's residence. Where applicable, Flat Rock bills the individual's Medicaid waiver for transportation services provided.

Transportation services are generally funded by the Medicaid program or the Medicaid waiver program instead of by fares. Vehicles are purchased by Flat Rock through the use of budgeted funds and donated funds, which may be restricted for purchasing vehicles.

Upon determining if Flat Rock can meet an individual's request for transportation, Flat Rock enrolls them in our non-medical transportation and/or HPC transportation programs.

For purposes of this policy and these procedures, all individuals eligible to participate in Flat Rock's Transportation Services Program will be referred to as "riders," which will also include guardian(s) acting on each rider's behalf.

Commitment to Civil Rights

The policies and procedures of Flat Rock's Transportation Services Title VI Program have been developed to ensure the level and quality of Flat Rock's transportation services are provided in a nondiscriminatory manner and that the opportunity for full and fair participation is offered to all Flat Rock riders. Additionally, Flat Rock has examined the need for services and materials for persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. As part of its regular operations, Flat Rock is required to provide information to all residents, consumers, and guardians in the language that they can best understand.

While it is a matter of principle that Flat Rock is committed to ensuring that no person is excluded from participation in, or denied the benefits of, or subjected to discrimination in the receipt of any of Flat Rock's services on the basis of race, color or national origin, the contents of this program have been prepared in accordance with Section 601 of Title VI of the Civil Rights Act of 1964 and Executive Order 13116 (Improving Access to Services for Persons with Limited English Proficiency).

"No person shall, on 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 assistance." – Civil Rights Act of 1964

Under the Civil Rights Act of 1964, and as a recipient of federal funding under the programs of the Federal Transit Administration (FTA) of the U.S. Department of Transportation (USDOT), Flat Rock has an obligation to ensure that:

- The benefits of its transportation services are shared equitably among Flat Rock’s riders;
- The level and quality of transportation services are sufficient to provide equal access to all Flat Rock’s riders;
- No Flat Rock rider is precluded from participating in Flat Rock’s transportation service planning and development process;
- Decisions regarding service changes or facility locations are made without regard to race, color or national origin; and
- A program is in place for correcting any discrimination, whether intentional or unintentional.

Section 3: Notice to the Public

Flat Rock’s Notice to the Public can be found in Appendix C. Whenever a Safe Harbor analysis shows a language group exceeding 5% or 1,000 people, then Flat Rock will translate the notice into that language. The Title VI Notice shall be displayed in the following locations at a minimum:

- **Annual Meeting:** As part of each rider’s initial residential and/or program intake process as well as in their annual Individual Plan/Individual Service Plan meetings.
- **Agency Website:** The notice is posted on the Flat Rock Homes website.
- **Public Areas of the Office:** The notice is posted in the lobby of Flat Rock’s administrative offices at 7353 N. County Road 29, Flat Rock, OH 44828.
- **Transit Vehicles:** The notice is posted in Flat Rock vehicles.

Section 4: Title VI Complaint Procedure

A rider who believes they have been discriminated against in the provision of transportation services on the basis of race, color, or national origin may file a Title VI complaint by completing and submitting the Title VI Complaint Form (Appendix F).

Complaint procedures and the complaint form are available on the agency website, at the administrative office, and within this Title VI Plan. Full procedures are provided in Appendix E.

Section 5: Title VI Complaint Form

The Title VI Complaint Form is included in Appendix F and is made available to the public on the agency website and at the administrative office.

Section 6: List of Transit Related Title VI Investigations, Complaints and Lawsuits

Flat Rock maintains a list or log of all Title VI investigations, complaints, and lawsuits pertaining to its transportation-related activities. As of the writing of this program update, there are no complaints pending alleging discrimination on the basis of race, color, or national origin. See Appendix G.

Section 7: Public Participation Plan

Key Principles

Flat Rock is an “open door” provider; however, riders are generally residents and consumers enrolled in Flat Rock’s healthcare, residential, and community programs, including the non-medical transportation program. As such, prospective riders are generally referred by Service and Support Administrators at their County Board of Developmental Disabilities. However, to promote inclusive participation of riders, Flat Rock will employ the following strategies as appropriate:

- Provide for engagement by riders;
- Engage referring County Boards of Developmental Disabilities;
- Provide for guardian engagement as well as riders;
- Employ different meeting sizes/formats;
- Transportation needs of residents/consumers will be addressed with riders and their teams in their annual Individual Plan/Individual Service Plan meetings.

Flat Rock’s Transportation Services Participation Plan (TSPP) has been prepared to ensure no rider is precluded from participating in Flat Rock’s transportation services planning and development process.

The TSPP ensures that:

- Riders will be invited to participate in decisions about a proposed transportation activity that may affect their environment and/or health;
- Riders' contribution can and will influence Flat Rock's decision making regarding its Transportation Services Program;
- The concerns of riders will be considered in the decision-making process; and
- Flat Rock will seek out and facilitate the involvement of those potentially affected.

Outreach Efforts

Flat Rock's TSPP includes notifications and communications by email, letter, posted notice, verbal announcement, and/or as part of the rider's Individual Plan/Individual Service Plan meetings.

Public outreach and involvement activities are summarized in Appendix H.

Section 8: Language Assistance Plan

Overview

Flat Rock is required to take reasonable steps to ensure meaningful access for Limited-English Proficient (LEP) persons. LEP refers to individuals who speak English "less than very well." Because Flat Rock is currently only providing services to riders enrolled in its programs and services, Flat Rock is aware of LEP needs. Flat Rock is required by the Ohio Department of Developmental Disabilities, Medicaid, and the Opportunities for Ohioans with Disabilities program to ensure that it is able to communicate with every individual (and their guardian) enrolled in its programs, including providing communications in a format they can understand.

Four-Factor Analysis

Factor 1: Demography (The Number of LEP Persons) – Seneca County, OH

<u>Population Group</u>	<u>Number of Persons</u>	<u>Percentage (%)</u>
Total Population (Age 5+)	52,101	100.00%
Total LEP Population (English "less than very well")	482	.93%
Largest LEP Language (Spanish)	306	.59%
2nd Largest LEP Language (Korean)	86	.17%

Factor 2: Frequency of Contact

How often does your staff (drivers, dispatchers, reception) interact with LEP individuals?

- Daily
- Weekly
- Monthly
- Rarely (Once or twice a year)
- Never

A log of LEP encounters can be found in Appendix I.

Factor 3: Importance of Service

Flat Rock recognizes that transportation is an important service for its riders. Flat Rock prioritizes translation or accessible formats of vital documents as needed for enrolled riders and guardians, including the Title VI Notice and Complaint Form.

Factor 4: Resources and Costs

Select the resources your agency uses to assist LEP persons (check all that apply):

- Telephone Interpretation: Provided by service noted on Main Page of plan.
- "I Speak" Cards: Carried by drivers and dispatchers to identify languages. Example in Appendix J.
- Website Translation: Our website includes a Google Translate or similar widget.
- Community Partners: We coordinate with local social service agencies or schools.

Section 9: Minority Representation (Simplified)

If Flat Rock has a non-elected transit-related planning board, advisory council, or committee, it tracks the racial breakdown of those members to ensure representation. The Flat Rock governing boards and committees are non-elected.

Membership of Board & Committees by Race

Group	Caucasian	Hispanic	African American	Asian American	Native American	Two or More Races
Service Area Population %	TBD	TBD	TBD	TBD	TBD	TBD
Joint Boards of Directors	18	0	0	1	0	0
Passenger Advisory Committee	61	3	11	0	0	0
Transportation Services Review Committee	16	0	1	0	0	0

Flat Rock makes a concerted effort to diversify its Boards of Directors and staff; however, the diversity/makeup of these groups is reflective of the diversity in the local area population surrounding Flat Rock Homes (predominantly rural). Flat Rock reaches out to minority candidates, churches, community groups, businesses to recruit Board members. Further, Flat Rock now offers virtual options for meeting participation, which would allow us to recruit more diverse candidates outside of our vicinity.

The Passenger Advisory Committee is open to all Flat Rock riders.



Appendix A – Proof of Governing Board Adoption of Plan

**Flat Rock Homes, Care Center and Community Services Joint Boards of Directors – Executive Committee
Meeting Notes**

Thursday, 1/29/2026 - Friday, 1/30/2026

Board Members Present: Jeannine Curns, Chair – Joint Boards of Directors; Adam Crockett, Vice Chair- Joint Boards of Directors; Sharon Smith, Secretary – Joint Boards of Directors; Brian Lander- Treasurer – Joint Boards of Directors; Rev. Stacy Terrell, Chair – FRCS Board; Lora Goebel, Leader – Services Work Group; Rev. Pamela Sayre, Leader – Sustainability Work Group ; Jim Shelley, Leader – Facilities and Infrastructure Work Group;

Board Members Absent: N/A

Staff Present: Karen Kilgo, President/CEO; Kaylee Caskey, Executive Assistant

Staff Absent: N/A

The meeting was called to order electronically at 8:39 PM on Thursday, 1/29/2026 by Karen L. Kilgo, President/CEO via email request for approval for our Title VI Plan for our ODOT Technical Assistance Review. This was for approval of the revision of the existing plan.

Brian Lander made a motion to approve the plan. Jim Shelley seconded the motion. The plan was unanimously approved by the Executive Committee on behalf of the Joint Boards of Directors at 5:01 PM on Friday, 1/30/2026.

The meeting was adjourned.

Respectfully Submitted,

Karen L. Kilgo
President/CEO



Appendix B – Annual Certification & Revision Log

Date (Month/Day/Year)	Action Taken	Authorizing Individual
5/21/2020	Created Title VI Plan to conform to ODOT Title VI requirements; created Flat Rock narrative and policies; added information for required appendices and logs where applicable	Approved by Board of Directors and signed by Karen L. Kilgo, President/CEO
01/30/2026	Updated Title VI Plan and reorganized content to conform to ODOT Title VI Plan Template requirements; maintained existing Flat Rock narrative and policies; added required appendices and logs where applicable.	Approved by Board of Directors and signed by Karen L. Kilgo, President/CEO



**Appendix C – Notice to the Public (English Version)
Notifying the Public of Rights Under Title VI**

Flat Rock’s Transportation Services Program operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person (or their guardian) who believes they have been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with Flat Rock Homes.

For more information on Flat Rock’s civil rights program and the procedures to file a complaint, please contact Karen L. Kilgo, President/CEO at (419) 483-7330 or kkilgo@flatrockhomes.org or visit our administrative office at 7353 N. County Road 29, Flat Rock, OH 44828 from 8:30 AM – 4:30 PM, Monday – Friday (except holidays).

For more information about Flat Rock programs and services, visit www.FlatRockHomes.org.

If information is needed in another language, please contact TBD.

For transportation-related Title VI matters, a complaint may also be filed directly with the:

Ohio Department of Transportation, Attn: Office of Opportunity, Diversity, and Inclusion, Title VI Coordinator, 1980 West Broad Street, Mailstop 3270, Columbus, Ohio 43223

Federal Transit Administration, Office of Civil Rights, Attention: Complaint Team, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590



Appendix D – Notice to the Public (Spanish Example)
Notificación al público de derechos bajo el Título VI

El Programa de Servicios de Transporte de Flat Rock opera sus programas y servicios sin distinción de raza, color y origen nacional, según el Título VI de la Ley de Derechos Civiles. Cualquier persona (o su tutor) que crea o que ha sido perjudicada por una práctica discriminatoria ilegal bajo el Título VI puede presentar una queja con Flat Rock.

Para obtener más información sobre el programa de derechos civiles de Flat Rock, o para obtener más información sobre los procedimientos para presentar una queja, por favor llame Karen L. Kilgo, Presidente / Director Ejecutivo al (419) 483-7330 o kkilgo@flatrockhomes.org al (419) 483-7330; o visite nuestra oficina administrativa en 7353 N. County Road 29, Flat Rock, OH 44828. Si se necesita información en otro idioma, comuníquese con TBD.

Un demandante puede presentar una queja directamente al

Departamento de Transporte del Estado de Ohio, Attn: Office of Opportunity, Diversity and Inclusion, 1980 West Broad Street, Mailstop 3270, Columbus, OH 43223.

Un demandante puede presentar una queja directamente a la Administración Federal de Tránsito, Office of Civil Rights, Attention: Complaint Team, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.



Appendix E – Complaint Procedures

Any individual, group of individuals or entity that believes they have been intentionally discriminated against on the basis of race, color, or national origin by Flat Rock Homes may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form.

Any individual having filed a complaint or participated in the investigation of a complaint shall not be subjected to any form of intimidation or retaliation. Individuals who have cause to think that they have been subjected to intimidation or retaliation can file a complaint of retaliation following the same procedure for filing a discrimination complaint.

A complaint must be filed with Flat Rock Homes no later than 180 days after the following:

1. The date of the alleged act of discrimination; or
2. The date when the person(s) became aware of the alleged discrimination; or
3. Where there has been a continuing course of conduct, the date on which that conduct was discontinued or the latest instance of the conduct.

Once the complaint is received, Flat Rock Homes will review it to determine if our office has jurisdiction. A copy of each Title VI complaint received will be forwarded to the Ohio Department of Transportation within ten (10) calendar days of receipt. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office.

Flat Rock Homes has 45 days to investigate the complaint. If more information is needed to resolve the case, Flat Rock Homes may contact the complainant requesting further information. The complainant has **10** business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within **10** business days, Flat Rock Homes can administratively close the case.

After the investigator reviews the complaint, the agency will issue one of two (2) letters to the complainant: a closure letter or a letter of finding (LOF).

- ✓ A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed.
- ✓ A letter of finding (LOF) summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member, or other action will occur.

If the complainant wishes to appeal the decision it must direct the appeal to the agency initially. The complainant has **30** days after the date of the closure letter or the letter of finding to do so. If there is outstanding concern, the appeal may be directed to the state DOT or FTA. The appeal process information will be included in the letter.

A person may also file a complaint directly with the: Ohio Department of Transportation, Attn: Office of Opportunity, Diversity and Inclusion 1980 West Broad Street, Mailstop 3270, Columbus, OH 43223, or the Federal Transit Administration, Office of Civil Rights, Attention: Complaint Team, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.

If information is needed in another language, then contact TBD



Title VI Complaint Form

Section I:			
Name:			
Address:			
Telephone (Home):		Telephone (Work):	
Email Address:			
Accessible Requirements?	Format	Large Print	Audio Tape
		TDD	Other
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):			
<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin			
Date of Alleged Discrimination (Month Day, Year) _____			
Explain as clearly as possible what happened and why you believe you were intentionally 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
Section V			
Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?			
<input type="checkbox"/> Yes <input type="checkbox"/> No			
If yes, check all that apply:			
<input type="checkbox"/> Federal Agency: _____			
<input type="checkbox"/> Federal Court _____		<input type="checkbox"/> State Agency _____	
<input type="checkbox"/> State Court _____		<input type="checkbox"/> 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
Name of agency complaint is against:
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

If information is needed in another language, contact TBD.

Please submit this form to:

Flat Rock Homes
Karen L. Kilgo, President/CEO
7353 North County Road 29, PO Box 1
419-483-7330
kkilgo@flatrockhomes.org



Appendix G – Investigations, Complaints, Lawsuits

Type	Date (Month, Day, Year)	Summary (include basis)	Status	Action(s) Taken
Investigations	N/A	N/A	N/A	N/A
Lawsuits	N/A	N/A	N/A	N/A
Complaints	N/A	N/A	N/A	N/A



Appendix H – Public Participation

Flat Rock engages riders and guardians through intake, Individual Plan/Individual Service Plan meetings, posted notices, and the Passenger Advisory Committee (PAC).

Event Date	Flat Rock Staffer(s) or Department	Activity	Communication Method (Public notice, posters, social media)	Notes
Ongoing	Flat Rock Care Center's Program Support Coordinator (for resident transportation); Flat Rock Community Services' Administrator (for group home consumer's HPC transportation); and Flat Rock Community Services' Director of Community Programs (for non-medical transportation and HPC transportation)	Ongoing rider engagement through Individual Plan/Individual Service Plan meetings, marketing to Services and Support Coordinators at County Boards of Developmental Disabilities.	Emails and personal contacts	All services are provided by contract and are usually referred to by the county Boards of Developmental Disabilities



Appendix I – LEP Encounters

Date	Time	Language Spoken (if available)	Name/Phone (if available)	Service Requested	Follow Up Required	Staff Member Providing Assistance	Notes
N/A	N/A	N/A	N/A	N/A	N/A	N/A	No LEP encounters logged for this reporting period; Flat Rock provides communications in formats riders/guardians can understand.



Appendix J – “I Speak” Cards

Language Identification Card (Example)

Mark this Box if you speak...	Language Identification Chart	Language
	Mark this box if you read or speak English	English
	Marque esta casilla si lee o habla español	Spanish
	Kos lub voj no yog koj paub twm thiab hais lus Hmoob	Hmong
	如果说中国在方框内打勾	Chinese
	Xin ñaùnh daáu vaøo oâ naøy neáu quyù vò bieát ñoïc vaø noui ñöôc Vieät Ngöô.	Vietnamese
	당신이한국어말할경우이 상자를표시	Korean
	Markahan itong kuwadrado kung kayo ay marunong magbasa o magsalita ng Tagalog.	Tagalog
	Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen	German
	Отметить этот флажок, если вы говорите по-русски	Russian
	Означите ову кућицу ако говорите српски	Serbian
	आप हिंदी बोलते हैं तो इस बक्से को चिह्नित करें	Hindi
	پر نشان لگائیں تو اس باکس بولتے ہیں اردو اگر آپ	Urdu

Note: For additional languages visit <http://www.lep.gov/ISpeakCards2004.pdf>