

INCA Community Services, Inc.



Affirmative Action Plan

2024 - 2025

A handwritten signature in black ink, appearing to read "Erica Pogue".

Erica Pogue, Executive Director

A handwritten signature in black ink, appearing to read "Shelley Prince".

Shelley Prince, EEO Officer

A handwritten signature in black ink, appearing to read "Tara Huddleston".

Tara Huddleston, Board Chairperson

Approved on: October 28, 2024

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MISSION STATEMENT


INCA Community Services, Inc. shall operate programs to alleviate the causes of poverty and enhance the public health and welfare by opening to everyone the opportunity to work, have safe and affordable housing, transportation, training and education, and the opportunity to live in decency and dignity.

AGENCY HISTORY

In 1969, ten counties were consolidated into a single entity, Indian Nation Community Action Foundation, inc., consisting of Atoka, Bryan, Carter, Coal, Garvin, Johnston, Love, Marshall, Murray, and Pontotoc Counties. The Indian Nation Community Action Agency's ten counties had a population of approximately 165,000 people and covered approximately 7,000 square miles, the largest in the state of Oklahoma. On January 31, 1972, Bryan, Carter, Coal, Love, and Pontotoc Counties were incorporated into a new agency, leaving Indian Nations Community Action with Atoka, Garvin, Johnston, Marshall, and Murray Counties. In 1974, the Indian Nations Community Action was retitled to be INCA Community Services, Inc. and the agency was reincorporated as a nonprofit agency. The name change came about due to public confusion about Indians only. In 1977, Garvin County, for its own reason, decided to withdraw from membership in INCA Community Services and become an independent county. Atoka, Johnston, Marshall, and Murray, are the counties in our service area today.

Policies

- **Equal Opportunity Policy**
- **Human Rights Committee Policy LEP Policy**
- **Limited English Proficiency Policy**
- **Public Participation Policy**
- **Title VI - Civil Rights Policy**
- **Sexual Harassment and Sexual Misconduct Policy**
- **Workplace Violence Policy**
- **Community Complaint Policy**

Category:	Introduction	<p align="center">INCA Community Services Agency Policy</p> 
Sub Category:	n/a	
Effective Date:		
Revised Date:	10/26/2016	
Forms:	Discrimination Complaint Form	
Responsible: EOO Officer, Management		

Equal Opportunity Policy

Purpose/Introduction

The Civil Rights laws of 1964 have been enacted to assure equality of opportunity, and this agency shall strive to meet the requirements of these laws to the extent that equal opportunity for all people is a reality.

Policy

INCA Community Services, Inc. is an equal opportunity employer and service provider and prohibits discrimination and harassment of any type and affords equal employment opportunities and services to employees, applicants, participants, customers, and clients without regard to race, color, religion, sex, national origin, age, disability or genetic information.

INCA conforms to the spirit as well as the letter of all applicable laws and regulations. Violations of this policy, regardless of whether an actual law has been violated, will not be tolerated. INCA will promptly, thoroughly and fairly investigate every issue that is brought to its attention in this area and will take disciplinary action, when appropriate, up to and including termination of employment.

Procedures

INCA administers our equal opportunity policy fairly and consistently by:

- Posting all required notices regarding employee rights under EEO laws in areas highly visible to employees in all the central county offices.
- Advertising for job openings with the statement "An Equal Opportunity Employer."
- Advertising services with the statement "Equal Opportunity Service Provider."
- The website will indicate Equal Opportunity Service Provider and Employer throughout.
- A yearly legal notice will run in all four counties stating INCA Community Services, Inc. will give all minority businesses opportunity for all of our programs contracts (DBE and WBE).
- Forbidding retaliation against any individual who files a charge of discrimination, opposes a practice believed to be unlawful discrimination, reports harassment, or assists, testifies or participates in an EEO agency proceeding.
- Requires employees to report to a member of management, the Human Resource Director or the EEO Officer any apparent discrimination or harassment.
- Promptly notifies the EEO Officer or Human Resource Director of all incidents or reports of discrimination or harassment and takes other appropriate measures to resolve the situation.

Persons Receiving Services

INCA encourages employees and persons receiving services to report all incidents of harassment including sexual harassment to a member of management, the Human Resource Director, or the EEO Officer.

Sexual Harassment and Sexual Misconduct

INCA conducts harassment prevention training for all employees, and maintains and enforces a separate policy on harassment prevention, complaint procedures and penalties for violations under the **Sexual Harassment and Sexual Misconduct Policy**. Designated members investigate all complaints of harassment promptly and fairly, and, when appropriate, takes immediate corrective action to stop the harassment and prevent it from recurring. ([See Sexual Harassment and Sexual Misconduct Policy](#))

Relationship between Employees, Applicants, Participants, Customers and Clients

The policy of equal employment opportunity (EEO) and anti-discrimination applies to all aspects of the relationship between INCA and its employees, applicants, participants, customers, and clients including:

- Recruitment,
- Employment,
- Promotion,
- Transfer,
- Training,
- Working conditions,
- Wages and salary administration,
- Employee benefits and application of policies,
- All services provided by the agency.

The policies and principles of equal opportunity also apply to the selection and treatment of independent contractors, personnel working on our premises who are employed by temporary agencies and any other persons or firms doing business for or with INCA.

Procedures for Filing a Complaint

Prior to filing a written complaint, employees are encouraged to visit with the Program Director or designated manager, as applicable, and reasonable effort should be made by the agency at this level to resolve the problem or complaint.

- The Complainant submits a written complaint to the Program Director using the Discrimination Complaint Form.
- If the complaint is against the supervisor or Program Director the complaint should be submitted to the Equal Employment Opportunity Officer or the Human Resource Director.
- Within two days of receiving the complaint the EEO Officer will send a copy to the Executive Director.
- The EEO Officer will advise the complainant of his or her rights under the Equal Opportunity Act.
- The Program Director or assigned manager and the EEO Officer will conduct a complete and impartial investigation within 10 days of receiving the complaint.
- The Program Director or assigned manager will ask the Respondent to (a) confirm or deny facts; (b) indicate acceptance or rejection of the Complainants requested action, and (c) outline alternatives.
- Within 5 days after completing the investigation, the applicable Program Director or assigned manager and the EEO Officer will issue a written decision to the Complainant and Respondent.

Appeal

- If the Complainant or Respondent is not satisfied with the decision, he or she must notify the applicable Program Director or assigned manager within 5 days and request, in writing, an appeal to the Executive Director.
- Within 5 days of receiving the appeal, the applicable Program Director or assigned manager and EEO Officer will refer the appeal and the evidentiary record to the Executive Director.
- A hearing will be scheduled by the EEO Officer with the Complainant, Respondent, and Program Director or assigned manager within 10 days of receiving the appeal.

- The Executive Director will act as an intermediate level of appeal by reviewing the principal and designee decision and the oral and written evidence presented.
- Within 5 days of the hearing the Executive Director will issue a final decision in writing to the parties involved.

Second Appeal

- If the Complainant or Respondent is not satisfied with the decision of the Executive Director, he or she must notify the EEO Officer within 5 days and request an appeal to INCA Board of Directors Human Rights Committee.
- The written appeal shall contain a specific statement explaining the basis for the appeal.
- The EEO Officer will notify the Human Rights Committee, in writing, within 5 days after receiving the appeal.
- The EEO Officer will arrange for a hearing concerning the appeal within 10 days from the date of notification to the Human Rights Committee.
- The Human Rights Committee will act as an appellate body by reviewing the decision and the oral and written evidence and making a decision.
- The Human Rights Committee may ask for oral or written evidence from the parties and any other individual it deems relevant.
- The EEO Officer will make arrangements to audiotape any oral evidence presented.
- Within 5 days of the hearing

Required Documentation

- Discrimination Complaint Form
- Any written correspondence, photos, or other documentation
- Written reports upon completion of investigation

Definitions

Discrimination Complaint: A written complaint alleging any action, policy, procedure or practice that discriminates on the basis of race, color, national origin, sex, religion, age or disability. Person filing written complaint with agency should be within ten (10) days of act wherein complaint originates.

Complainant: Any person in the employment of this agency or person seeking admission to employment who submits a complaint alleging discrimination because of age, sex, race, color, religion, national origin, physical impairment, or political affiliation.

Respondent: The person alleged to be responsible for the alleged discrimination contained in the complaint. The term may be used to designate persons with the responsibility for a particular action or those persons with supervisory responsibility for procedures and policies in those areas covered in the complaint.


Equal Opportunity Officer: The Equal Opportunity Officer shall work with the Complainant, Respondent, applicable Program Director, Executive Director, and the Board of Director’s Human Rights throughout the investigation process to insure a prompt, fair, and impartial processing of formal and informal complaints of discrimination.

Day: Day means a work day when the agency’s main administrative offices are open. The calculation of days in complaint processing shall exclude Saturdays, Sundays and legal holidays.

EEO: Equal Employment Opportunity

Dissemination of Policy

The policy will be made available to all employees through the agency’s website. The agency will educate and train employees and supervisors regarding the policy and any conduct that could constitute a violation of the policy.

Category:	Agency	<p style="text-align: center;">INCA Community Services Agency Policy</p> 
Sub Category:	Affirmative Action	
Effective Date:		
Revised Date:	July 2018	
References:	See Authorities, USDA - CACFP	
Responsible: Human Resource/ Program Directors		

Title VI - Civil Rights

Purpose/Introduction

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, and national origin within all federally assisted programs. Title VI was amended by the Civil Rights Restoration Act of 1987 (P.O.L. 100-259) effective March 22, 1988 which added Section 606, expanding the definition of the terms “programs or activities” to include all of the operations of an education institution, government entity, or private employer that receives federal funds if any one operation receives federal funds.

Policy

INCA Community Services, Inc. and its subsidiaries are committed to creating and maintaining services that are free of all forms of discrimination. The agency will take whatever prevention, corrective and disciplinary action necessary for behavior that violates this policy or the rights and privileges it is designed to protect. To achieve ultimate effectiveness in this matter, there must be total commitment on the part of every employee. All employees shall follow the intent of these guidelines in a manner that reflects agency policies. Each employee’s cooperation and support in our Title VI, Equal Opportunity, and Affirmative Action Plan is essential in assuring equal opportunity in all areas of the agency.

EEO Officer

An Equal Employment Opportunity Officer is appointed by the Executive Director, and is responsible to the Executive Director to perform the duties as outlined in her job description, and under the direction of the Executive Director, to implement the Title VI, Equal Opportunity, and Affirmative Action Plan along with any related policies and procedures of INCA Community Services, Inc.

Board of Directors Human Rights Committee

The Human Rights Committee has been selected and is constituted in such a manner as to insure adequate representation from all sectors and eligible groups. This committee shall review the determination of the Equal Opportunity Officer regarding complaints of discrimination and shall oversee the enforcement of the grantee’s Title VI, Equal Opportunity, and Affirmative Action Plan. The committee consists of Board members who are Public, Private, and Low-Income Representatives as well as the EEO Officer and the Human Resource Director.

Refer to [Human Rights Committee Policy](#)

Services

INCA Community Services, Inc. shall give preference to those vendors, contractors and suppliers of our area who have instituted and enforced positive programs of affirmative action offering goods and services of comparable quality and value. Also, minority owned businesses will be given preference over other

vendors offering goods and services of comparable quality and value.

INCA will strive to follow the [Public Participation Policy](#) which will include racial and ethnic groups within our employment representation, outreach programs designed to enhance the ethnic groups serving on INCA's committees and boards, and that each center is in the heart of the target area . INCA focuses on providing programs to fit the needs of the problems within the smaller rural areas and to attain an equitable balance of all eligible person.

Awareness

The Equal Opportunity Officer will develop an awareness program for the dissemination of information regarding civil rights legislation, policies and regulations. This will be accomplished by:

- Making each employee aware of the Title IV - Civil Rights Policy Equal Employment Opportunity, and Affirmative Action at the time of employment.
- Upon request provide training to potential program recipients and participants, Board of Directors, Policy Councils and Advisory Committees as requested.
- Including the Title VI, Equal Opportunity, and Affirmative Action Plan and any other related policies and procedures on the website.
- Ensuring Equal Opportunity and Title VI posters are in all offices, vehicles, and centers.
- Maintain a [Public Participation Policy](#).
- Educating staff on [Limited English Proficient \(LEP\) Policy](#).
- Maintaining a list showing the name, language, phone number, and hours of availability of all bilingual staff persons, interpreters in the community, and apps used to translate.
- And Justice For All posters will be distributed throughout the counties as required by specific programs.
 - USDA Poster will be placed in Head Start dining areas where meals are served
 - Must meet required measurements of 11"x17" and be an original poster.
 - Nutrition Manager is responsible for all USDA postings.
 - IRS Poster will be placed in all offices.
 - Title VI Posting will be placed in all JAMM vehicles and office locations.

Training

The EEO Officer will provide employee training annually on Title IV - Civil Rights Policy, Equal Employment Opportunity, and Affirmative Action including sexual harassment.

Additional Training for Head Start Staff will include the following:

- <https://vimeo.com/96080223>

Once training is complete print off the procedure sheet and sign and date the bottom and send to the Education Manager.

Authorities

- Title VI of the Civil Rights Act of 1964, as amended.
- Title VIII of the Civil Rights Act of 1968, as amended.
- Economic Opportunity Act of 1964, as amended.
- The Rehabilitation Act of 1973, as amended. Sections 501, 502, and 504 (Prohibition of Discrimination Based on Disability).
- The Civil Rights Restoration Act of 1987.
- Title II of the Americans with Disabilities Act of 1990.
- Public Law 88-352, Title VI, Civil Rights Act of 1964 (42 U.S.C. Section 2000d).
- USDA

- Title 45, Chapter X, Part 1010, Code of Regulations, Nondiscrimination in Federally Assisted Programs of Community Services Administration.
- OEO Instruction 6710-1 Change 6, Form 395, Grantee Refunding Certification. (See III)
- OEO Notice 6004-1, Requirement for Active Civil Rights Program.
- Public Law 92-261, The Equal Employment.
- Federal Transit Circular 4702.1A – Title VI and Title VI-Dependent Guidelines - Title VI Regulations at 49 CFR Part 21. DOT’s Order on Environmental Justice (Order 5610.2), and Policy Guidance Concerning Recipient’s Responsibilities to Limited English Proficient (“LEP”) Persons (70 FR 74087, December 15, 2005)
- Any future equal employment opportunity legislation and/or directives.

Record Keeping

The Equal Opportunity Officer will maintain a list of any active investigations conducted by entities, lawsuits, or complaints naming INCA Community Services that allege discrimination on the basis of age, sex, race, color, religion, national origin, physical impairment, or political affiliation that includes the date of the investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by INCA Community Services, Inc. in response to the investigations.

Complaint records [See Title VI Discrimination Complaints and Equal Opportunity Discrimination Complaint Procedures](#) will remain confidential, to the extent allowed by law, unless permission is given by the parties involved to release such information. All complaint records will be kept separate from any other records of the agency. No complaint record shall be entered in any personnel file unless adverse employment action is taken against an employee. Complaint records shall be maintained on file for three years after complaint resolution.[U2]

Reporting

A report to the Board of Directors on an annual basis shall be made by the Equal Opportunity Officer. He/She shall advise the Board of the Progress made in the area of Affirmative Action based upon the projects and goals contained within the Civil Rights and Affirmative Action Plan.

Title VI Compliance reporting to the Oklahoma Department of Transportation (ODOT) as required by Federal Transit Administration (FTA).

Procedures for Filing a Complaint

Prior to filing a written complaint, people are encouraged to visit with the Program Director or designated manager, as applicable, and reasonable effort should be made by the agency at this level to resolve the problem or complaint.

- The Complainant submits a written complaint to the Program Director using the Discrimination Complaint Form.
- If the complaint is against the supervisor or Program Director the complaint should be submitted to the Equal Employment Opportunity Officer or the Human Resource Director.
- Within two days of receiving the complaint the EEO Officer will send a copy to the Executive Director.
- The EEO Officer will advise the complainant of his or her rights under the Equal Opportunity Act.
- The Program Director or assigned manager and the EEO Officer will conduct a complete and impartial investigation within 10 days of receiving the complaint.

- The Program Director or assigned manager will ask the Respondent to (a) confirm or deny facts; (b) indicate acceptance or rejection of the Complainant's requested action, and (c) outline alternatives.
- Within 5 days after completing the investigation, the applicable Program Director or assigned manager and the EEO Officer will issue a written decision to the Complainant and Respondent.

Appeal


- If the Complainant or Respondent is not satisfied with the decision, he or she must notify the applicable Program Director or assigned manager within 5 days and request, in writing, an appeal to the Executive Director.
- Within 5 days of receiving the appeal, the applicable Program Director or assigned manager and EEO Officer will refer the appeal and the evidentiary record to the Executive Director.
- A hearing will be scheduled by the EEO Officer with the Complainant, Respondent, and Program Director or assigned manager within 10 days of receiving the appeal.
- The Executive Director will act as an intermediate level of appeal by reviewing the principal and designee decision and the oral and written evidence presented.
- Within 5 days of the hearing the Executive Director will issue a final decision in writing to the parties involved.

Second Appeal

- If the Complainant or Respondent is not satisfied with the decision of the Executive Director, he or she must notify the EEO Officer within 5 days and request an appeal to INCA Board of Directors Human Rights Committee.
- The written appeal shall contain a specific statement explaining the basis for the appeal.
- The EEO Officer will notify the Human Rights Committee, in writing, within 5 days after receiving the appeal.
- The EEO Officer will arrange for a hearing concerning the appeal within 10 days from the date of notification to the Human Rights Committee.
- The Human Rights Committee will act as an appellate body by reviewing the decision and the oral and written evidence and making a decision.
- The Human Rights Committee may ask for oral or written evidence from the parties and any other individual it deems relevant.
- The EEO Officer will make arrangements to audiotape any oral evidence presented.
- Within 5 days of the hearing

Dissemination of Policy

The policy will be made available to all employees through the agency's website. The agency will educate and train employees and supervisors regarding the policy and any conduct that could constitute a violation of the policy.

Category:	Agency	<p style="text-align: center;">INCA Community Services Agency Policy</p> 
Sub Category:	Affirmative Action	
Effective Date:		
Revised Date:	July 2018	
References:	See Authorities	
Responsible: Board of Directors		

Human Rights Committee Policy

Policy

The Human Rights Committee shall consist of five board members with at least one member representing the public sector, one member representing the low income sector, and one member representing the private sector. The Equal Opportunity Officer is advisor to the Human Rights Committee throughout the investigation process to insure prompt, fair, and impartial processing of Title VI and Equal Opportunity discrimination complaints.

The Human Rights Committee shall:

- Establish and oversee the process which develops and evaluates the Title VI, Equal Opportunity, and Affirmative Action Plan and any policies and procedures related to the plan.
- Annually monitor and report to the Board concerning grantee progress in meeting its Affirmative Action goals and timetables.
- Make policy recommendations to the Board concerning all aspects of Title VI, Equal Opportunity, or Affirmative Action internally or externally.
- Hear complaints of discrimination in accordance with established complaint procedures as stated in the Title VI, Equal Opportunity, and Affirmative Action Plan of the agency.
- Shall closely coordinate its functions with those of the Equal Opportunity Officer.

The Human Rights Committee may delegate individual authority for the accomplishment of these various responsibilities to individual members of the Committee, to other Board Members, or to INCA's staff through and with the concurrence of the Executive Director of the agency.


The Human Rights Committee shall meet on dates set on a definite basis or on a call basis by the Committee Chairman, or by any committee member, or by Equal Opportunity Officer.

Board of Directors Human Rights Committee

The Human Rights Committee has been selected and is constituted in such a manner as to insure adequate representation from all sectors and eligible groups. This committee shall review the determination of the Equal Opportunity Officer regarding complaints of discrimination and shall oversee the enforcement of the grantee's Title VI, Equal Opportunity, and Affirmative Action Plan. The committee consists of three low income sector board members, an elected public member, a selected private member, the Equal Opportunity Officer, and the Human Resource Director.

Dissemination of Policy

The policy will be made available to all employees through the agency's website. The agency will educate and train employees and supervisors regarding the policy and any conduct that could constitute a violation of the policy.

Category:	Agency	INCA Community Services Agency Policy 
Sub Category:	Affirmative Action	
Effective Date:	2/28/17	
Revised Date:		
Forms:	Discrimination Complaint Form	
Responsible: EOO Officer, Management		

Limited English Proficiency Policy

Purpose/Introduction

The Limited English Proficiency Policy has been prepared to address INCA Community Services, Inc. responsibility as a recipient of federal financial assistance as they relate to the needs of individuals with limited English proficiency language skills. The policy has been prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000D, et seq, and its implementing regulations, which state that no person shall be subjected to discrimination on the basis of race, color, or national origin.

Title VI Guidelines

Title VI of the 1964 Civil Rights Act is one of two federal mandates that guarantee the provision of meaningful access to federally-funded services for LEP individuals:

- Title VI of the 1964 Civil Right Act provides 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 otherwise subjected to discrimination under any program or activity that receives federal financial assistance. This includes meaningful access to LEP customers.
- President’s Executive Order 13166, “Improving Access to Services for Persons with Limited English Proficiency” (August 11, 2000): instructs federal agencies to improve access to services by mandating that any federally conducted or assisted programs of activities (i.e. recipients of federal funding) must provide meaningful access to LEP customers.

Policy

INCA Community Services, Inc. will take reasonable steps to ensure that persons with Limited English Proficiency (LEP) have meaningful access and an equal opportunity to participate in our services, activities, programs, and other benefits. This policy provides for communication of information of documents applicable to the agency. All interpreters, translators and other aids needed to comply with this policy shall be provided without cost to the person being served. Customers and their families will be informed of the availability of such assistance free of charge.

Procedures

1. Identifying LEP Persons and Their Language

- INCA will promptly identify the language and communication needs of the LEP person. If necessary, staff will use a language identification card (or “I speak cards”) or posters to determine the language.
- Records will be kept of past interactions with customers or family members about the language used to communicate with the LEP person.

2. Obtain an Interpreter

The Equal Opportunity Officer will be responsible for:

- Advising staff members on Language Translation apps that can be used to translate quickly and efficiently.
- Maintaining a list showing the name, language, phone number, and hours of availability of all bilingual staff persons.
- Contacting the appropriate bilingual staff member to interpret, in the event that an interpreter is needed, if an employee who speaks the needed language is available.
- Obtaining an outside interpreter if a bilingual staff or staff interpreter is not available or does not speak the needed language.
- The LEP may request to use a family member or friend as an interpreter, however it is not required that any person bring their own interpreter to receive services.

3. Provide Written Translations

- Documents will be translated into frequently-encountered languages as needed.
- The website is available in 53 languages.

4. Providing Notice to LEP Persons

INCA will inform LEP persons of the availability of language assistance, free of charge, by providing written notice in languages LEP persons will understand. At a minimum notices and signs will be posted and provided in foyers of county offices and website. Notification will also be provided through one or more of the following: outreach documents, advertisements, and/or community based events.

5. Monitoring Language Needs and Implementation

On an ongoing basis, INCA will assess changes in demographics, types of services or other needs that may require reevaluation of this policy and its procedures. In addition, INCA will regularly assess the efficacy of these procedures, including but not limited to mechanisms for securing interpreter services, equipment used for the delivery of language assistance, complaints filed by LEP persons, feedback from customers, and community organizations.

Required Documentation

1. Intake Form

Definitions

Limited English Proficiency (LEP) - a person who has limited English speaking skills.


Interpreter/Translator - a person who interprets, especially one who translates speech orally.

Title VI of the 1964 Civil Rights Act - was enacted as part of the landmark Civil Rights Act of 1964. It prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance.

Language Translation apps - cell phone applications that allow for the translation of languages by speaking or typing into them as needed.

Dissemination of Policy

The policy will be made available to all employees through the agency's website. The agency will educate and train employees and supervisors regarding the policy and any conduct that could constitute a violation of the policy.

Category:	Agency Policies	INCA Community Services Agency Policy 
Sub Category:	Affirmative Action	
Effective Date:	2/28/2017	
Revised Date:		
Forms:	Discrimination Complaint Form	
Responsible: EOO Officer, Management		

Public Participation Policy

Purpose/Introduction

INCA Community Services, Inc. is committed to ensuring it serves the communities in which it serves fairly, consistently, and in the most cost-efficient and appropriate manner using available resources. Through public participation INCA is able to assess the quality and reliability of the services offered as well as introduce new and needed services within the scope of the agencies abilities and funding.

Policy

As part of the Title VI, Equal Opportunity, and Affirmative Action Plan, INCA Community Services is establishing a Public Participation Policy to strengthen the community involvement by the agency, programs, staff members, and the public. This policy serves as a guideline for the agencies participation within the communities and how to actively engage the public sector.

Public Participation Process

As a public agency, INCA Community Services, Inc. encourages participation, input, and guidance from our communities as well as encourages staff members to participate within the communities at various functions and events.

- The Leadership Team will establish strategies to involve public participation in events. INCA encourages members from the public to participate and volunteer for various activities.
- INCA will seek members from the community to serve on committees and councils within the agency but individuals may request to be considered for positions open and available.
- The Leadership Team is strongly encouraged to present themselves as INCA's representatives within the community.
- All staff representing INCA must uphold the Code of Ethics and other agency policies to the highest regard.
- Employees seeking to explore community opportunities and represent the agency must provide a written statement to the Executive Director who will then approve or deny such requests if it is outside the scope of their job duties.

Public Participation Outreach Opportunities

- Each program will conduct a Customer Satisfaction Survey once a year within a designated month. Also, annually an agency wide survey will be conducted. (see Customer Satisfaction Policy)
- Every three years INCA will conduct a Community Needs Assessment and the public within the counties served will be surveyed.
- Members from the public will be appointed to serve on the Board of Directors, Community

Housing Development Organization (CHDO) Board, Transit Advisory Council, and RSVP Advisory Council.

- Parents or guardians of children participating in the Head Start and Community representatives will be elected to serve on the Head Start Policy Council.
- Head Start Parents are encouraged to actively serve on Local Parent Committees within the Head Start Program.
- JAMM Transit will hold public forums throughout each of the counties yearly and encourage the public to attend.
- JAMM Transit will hold yearly public hearings as mandated by the Oklahoma Department of Transportation.
- Emergency Solutions Grant (ESG) and CHDO will hold an annual input session throughout each of the counties yearly and encourage the public to attend.
- Board Meetings, Transit Advisory Council Meetings, RSVP Advisory Meetings, and Policy Council meets are all open to the public and will be posted.
- INCA will make every effort to ensure Limited English Proficiency (LEP) participants are equally surveyed and able to attend meetings. (see LEP Policy)

Public Presence

- Designated staff members will attend and actively take part in community meetings including but not limited to Chambers of Commerce, Turning Point Coalitions, City Council Meetings and County Commissioner Meetings.
- Staff members are encouraged to serve on committees and other organizations of their choosing to be actively involved within the community.
- INCA will participate in community events and encourage staff members to volunteer time to their community.
- Programs will post promotional flyers and information throughout the year that focuses on their program. Including but not limited to the following.
 - JAMM Transit - fare rates and hours of operation.
 - Head Start - enrollment opportunities
 - RSVP - volunteer opportunities
 - General - various promotions, fundraising, and other agency projects
- INCA's website will be used to promote programs, services, activities, and events throughout the area. It will also provide accurate and up-to-date information regarding current programs and services to continually educate and advocate to the public on available resources both offered by the agency and within the communities.
- Social media will be:
 - Maintained by designated staff members who will actively promote programs, services, activities, and events
 - Utilized to promote various time relevant agency priorities including but not limited to job opportunities, program promotions, service activities, fundraising, agency publications, and more.
 - Utilized as a communication tool for public seeking additional agency information.
 - Staff will be encouraged to share promotions, photos, and posts to increase community reached.

Required Documentation

The appropriate grant application or program director will maintain information regarding public forums and input sessions which will include proofs of advertisements, agendas, and sign-in sheets.

Newsletters will highlight special participation events and other actions throughout the community.

Definitions

Public Forum and Input Session - an open meeting that allows for the discussion of grants, events, and programs within the agency.

Limited English Proficiency (LEP) - a person who has limited English speaking skills. (see LEP Policy)


Title VI - was enacted as part of the landmark Civil Rights Act of 1964. It prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance.

Affirmative Action - an action or policy favoring those who tend to suffer from discrimination, especially in relation to employment or education; positive discrimination.

Equal Opportunity - the policy of treating employees and others without discrimination, especially on the basis of their sex, race, or age.

Dissemination of Policy

The policy will be made available to all employees through the agency's website. The agency will educate and train employees and supervisors regarding the policy and any conduct that could constitute a violation of the policy.

Category:	Human Resource Admin	<p style="text-align: center;">INCA Community Services Human Resource Policy</p> 
Sub-Category:	Employee Relations	
Effective Date:	12/2012	
Revised Date:	10/2019	
Forms:	Employee Grievance Form	
Responsible: Equal Opportunity Officer, Human Resource Director, Supervisors, Management Staff, Executive Director		

Sexual Harassment and Sexual Misconduct Policy

Policy

INCA Community Service is committed to the working environment be free from inappropriate conduct of a sexual nature. Sexual misconduct and sexual harassment in any form will not be tolerated and individuals who engage in such conduct will be subject to disciplinary action. It is also applicable regardless of the gender of the complainant or the alleged harasser. INCA considers sexual misconduct and sexual harassment unacceptable and will not tolerate it under any circumstances. Sexual harassment and sexual misconduct includes but is not limited to repeated inappropriate behavior, either direct or indirect, whether verbal, physical or otherwise, conducted by one or more persons against another or others, at the place of work and/or in the course of employment. These types of behaviors are strictly prohibited and violates INCA's Code of Ethics.

Examples of Behavior that could be considered sexual misconduct or sexual harassment

- physical contact of a sexual nature including touching, patting, rubbing, or brushing against a person's body;
- explicit or implicit propositions or offers to engage in sexual activity;
- comments of a sexual nature, including sexually explicit statements, questions, jokes or anecdotes; remarks of a sexual nature about a person's clothing or body; remarks about sexual activity; speculation about sexual experience;
- exposure to sexually oriented graffiti, pictures, posters, or materials; and/or
- physical interference with or restriction of an individual's movements.
- hugging other people both customers and coworkers that can be deemed offensive or a violation of personal space:
 - appropriate hugging: lateral, one armed, with a quick shoulder squeeze, a quick embrace that touches the upper body only and forms an A shape or teepee stance, hugs should last no longer than one or two seconds.
 - inappropriate hugging: any hug that lasts longer than one or two seconds, bear hugs, full body hugs, rubbing someones back up and down, hugs from behind, and clingy hugs.

Resolution Options

A person who believes that he or she has been subjected to discrimination or harassment in violation of this policy and seeks to take action may use either the informal resolution process or the formal complaint process or both. The informal resolution and formal grievance resolution process described in this policy are not mutually exclusive and neither is required as a precondition for choosing the other; however, they cannot both be used at the same time.

Informal Resolutions

This process may be used as a prelude to filing a formal grievance or an alternative. It is not necessary that option be used. Anyone who believes that he or she has been subject to sexual harassment or sexual misconduct may immediately file a formal grievance as described under "Resolution Options". An individual wishing to utilize the informal resolution process should contact the appropriate supervisor, and/or Equal Opportunity/ Affirmative Action Officer (EOO) and/or the Human Resource Manager.

Informal Assistance – The individual is provided assistance in attempting to resolve possible sexual harassment or sexual misconduct if the individual does not wish to file a formal grievance. Such assistance includes strategies for the individual to effectively inform the offending party that his or her behavior is unwelcome and should cease. Action should be taken by an appropriate agency management member to stop the unwelcome conduct, or begin mediation. However, the agency may take more formal action to ensure an environment free of sexual harassment or sexual misconduct.

Timeframe – Informal resolutions will be completed in a timely manner from receipt of a request for informal resolution.

Confidentiality and Documentation – The agency shall document informal resolutions and the documentation will be retained by the Human Resource Manager. The agency will endeavor to maintain confidentiality to the extent permitted by law. The agency will attempt to find the right balance between the individual's desire for privacy and confidentiality with the responsibility of the agency to provide an environment free of sexual harassment.

Grievance Procedure

Reporting

- INCA encourages any person who believes that he or she has been subjected to sexual misconduct or sexual harassment to immediately report the incident to the appropriate supervisor, Equal Opportunity Officer or Human Resource Manager. In no case will a complainant be required to report such conduct to the person accused of the misconduct.
- The complainant will be advised of the procedures for filing a formal grievance of sexual harassment or sexual misconduct. When a supervisor or a member of management receives a grievance, he or she will immediately notify the Equal Opportunity Officer and/or the Human Resource Director.
- Grievances should be filled as soon as possible after the conduct giving rise to the grievance, but no later than 180 days after the event occurred.
- In order to initiate the investigation process, the complainant should submit a signed "Employee Grievance Form" with a written statement setting out the details of the conduct that is the subject of the grievance, including the complainant's name, signature, and contact information; the name of the person directly responsible for the alleged violation; a detailed description of the conduct or event that is the basis of the alleged violation; the date(s) and location(s) of the occurrence(s); the names of any witnesses to the occurrence(s); the resolution sought; and, any documents or information that is relevant to the grievance. While an investigation may begin on the basis of an oral grievance the complainant is strongly encouraged to file a written grievance. When a supervisor or a member of management receives a written grievance, he or she will immediately notify the Equal Opportunity Officer or Human Resource Director.

Grievance Investigation

- The Equal Opportunity Officer and/or Human Resource Director, and supervisor, as appropriate, are responsible for investigating formal grievances. If the complaint is not in writing, the investigator should prepare a statement of what he or she understands the complaint to be and seek to obtain verification of the complaint from the complainant.

- Within ten (10) working days of receipt of a grievance the Equal Opportunity Officer or Human Resource Director, as appropriate, will authorize an investigation of the grievance.
- As part of the investigation process, the accused individual shall be provided with a copy of the allegations and allowed the opportunity to respond verbally and/or in writing within a reasonable time frame set by the Equal Opportunity Officer or Human Resource Director.
- The complainant and the accused individual may present any document or information that is believed to be relevant to the grievance.
- Any person thought to have information relevant to the grievance shall be interviewed and such interviews shall be appropriately documented. Other acceptable methods for gathering information include, but are not limited to visual inspection of materials alleged to be offensive and follow-up interviews, as necessary.
- The investigation of a grievance will be concluded as soon as possible after receipt of the written grievance. If investigations exceed sixty (60) days, a justification for the delay shall be presented and reviewed by the Executive Director. The complainant, accused individual and supervisor will be provided an update on the progress of the investigation after the review.
- Upon completion of the investigation, a written report will be issued. The report shall include: a recommendation of whether a violation of the policy occurred, an analysis of the facts discovered during the investigation, and recommended disciplinary action if a violation of the policy occurred. The written report will be sent to the Executive Director for review.
- Written notifications of the findings of the investigation and outcome will be sent to the complainant and the respondent by the Executive Director. The grievance and the respondent have seven (7) working days from the date of the notification letter to submit comments regarding the investigation to the administrative official.
- Within thirty (30) working days of receiving any comments submitted by the complainant or respondent, the Executive Director will take one of the following actions:
 - Request further investigation into the grievance;
 - Dismiss the grievance if the results of the completed investigation are inconclusive or there is insufficient reasonable, credible evidence to support the allegation(s); or
 - Find that this policy was violated.
 - A decision that this policy was violated shall be made upon the record provided by the investigator or any comments submitted by the complainant or respondent; and, shall be based on the totality of circumstances surrounding the conduct, its severity, frequency, whether it was physically threatening, humiliating, or was simply offensive in nature. Facts will be considered on the basis of what is reasonable to persons of ordinary sensitivity and not on the particular sensitivity or reaction of an individual.
- If the Executive Director determines that this policy was violated, he or she will authorize disciplinary action that is appropriate for the severity of the conduct. Disciplinary action can include, but are not limited to verbal reprimands, written reprimands, the imposition of corrective actions or conditions, reassignment, suspension, and dismissal.
- The complainant and the respondent shall be informed in writing of the Executive Director's decision.
- The Human Resource Director, will monitor the circumstance surrounding the grievance to ensure that the situation has been remedied.

Provision Applicable to All Grievances

Assistance - During the grievance process, a complainant or respondent may be assisted by a person of his or her choice; however, the assistant may not examine witnesses or otherwise actively participate in a meeting or interview.

False Complaints – Any person who knowingly and intentionally files a false complaint under this policy or any person who knowingly and intentionally makes false statements, with the course of the investigation is subject to disciplinary action, up to and including termination.

Confidentiality and Documentation – The agency shall document informal resolutions and the documentation will be retained by the Human Resource Manager. The agency will endeavor to maintain confidentiality to the extent permitted by law. The agency will attempt to find the right balance between the individual's desire for privacy and confidentiality with the responsibility of the agency to provide an environment free of sexual harassment.

Definitions

Sexual Harassment – Unwanted sexual attention of a persistent or abusive nature, made by a person who knows or ought reasonably to know that such attention is unwanted; or, implied or expressed promise of reward for complying with a sexually oriented request; or, implied or expressed threat of reprisal, in the form of either actual reprisal or the denial of opportunity, for refusal to comply with a sexually oriented request; or sexually oriented remarks and behavior which may reasonably be perceived to create a negative psychological and emotional environment for work.


Sexual Misconduct – includes unwelcome sexual advances, request for sexual favors, or verbal or physical conduct of a sexual nature directed towards another individual that does not rise to the level of sexual harassment, but is unprofessional and inappropriate for the workplace.

References

Title VII of the Civil Rights Act of 1964, Title IX of the Civil Rights Act of 1972, and it is illegal, and actionable under civil and criminal law.

Dissemination of Policy

The policy will be made available to all employees through the agency's website. The agency will educate and train employees and supervisors regarding the policy and any conduct that could constitute a violation of the policy.

Category:	Workplace	<p style="text-align: center;">INCA Community Services Personnel Policy</p> 
Sub Category:	Health and Safety	
Effective Date:	2/19	
Revised Date:		
Forms:		
Responsible: Human Resource Director, Supervisor, Program Directors		

Workplace Violence Policy

Purpose/Introduction

INCA Community Service, Inc. provides a safe workplace for all employees. To ensure a safe workplace and to reduce the risk of violence, all employees shall review and understand all provisions of this workplace violence policy.

Policy

INCA does not tolerate any type of workplace violence committed by or against employees. Employees are prohibited from making threats or engaging in violent activities. INCA considers workplace violence unacceptable and will not tolerate it under any circumstances. Workplace violence includes but is not limited to repeated inappropriate behavior, either direct or indirect, whether verbal, physical or otherwise, conducted by one or more persons against another or others, at the place of work and/or in the course of employment. These types of behaviors are strictly prohibited and violates INCA's Code of Ethics.

Examples of Prohibited Behaviors

- Causing physical injury to another person.
- Making threatening remarks.
- Displaying aggressive or hostile behavior that creates a reasonable fear of injury to another person or subjects another individual to emotional distress.
- Intentionally damaging employer property or property of another employee.
- Possessing a weapon while on company property or while on company business.
- Committing acts motivated by, or related to, sexual harassment or domestic violence
- Any other threatening, violent, or aggressive demeanor not listed.

Reporting Procedures

Any potentially dangerous situations must be immediately reported to a supervisor or the human resource department. Reports can be made anonymously, and all reported incidents will be investigated. Reports or incidents warranting confidentiality will be handled appropriately, and information will be disclosed to others only on a need-to-know basis. All parties involved in a situation will be counseled, and the results of investigations will be discussed with them. INCA will actively intervene at any indication of a possibly hostile or violent situation.

Risk Reduction Measures

Hiring: The Human Resource Director and/or Program Directors take reasonable measures to conduct background investigations to review candidates' backgrounds and to reduce the risk of hiring individuals with a history of violent behavior. ([See Criminal Reference Check Policy](#))

Individual Situations: INCA does not expect employees to be skilled at identifying potentially dangerous persons but employees are expected to exercise good judgement and to inform the supervisor on site if any employee exhibits behavior that could be a sign of a potentially dangerous situation. Such behavior includes:

- Discussing weapons or bringing them to the workplace.
- Displaying overt signs of extreme stress, resentment, hostility, or anger.
- Making threatening remarks.
- Showing sudden or significant deterioration of performance.
- Displaying irrational or inappropriate behavior.

Dangerous/Emergency Situations


Employees who confront or encounter an armed or dangerous person should not attempt to challenge or disarm the individual. Employees should remain calm, make constant eye contact and talk to the individual. If a supervisor can be safely notified of the need for assistance without endangering the safety of the employee or others, such notice should be given. Otherwise, employees should cooperate and follow the instructions given.

Enforcement

Threats, threatening conduct, or any other acts of aggression or violence in the workplace will not be tolerated. Any employee determined to have committed such acts will be subject to disciplinary action, up to and including termination. Non-employees engaged in violent acts on the employer's premises will be reported to the proper authorities and fully prosecuted.

Dissemination of Policy

The policy will be made available to all employees through the agency's website. The agency will educate and train employees and supervisors regarding the policy and any conduct that could constitute a violation of the policy.

Category:	Agency Policies	<p style="text-align: center;">INCA Community Services Agency Policy</p> 
Sub Category:	Complaint/Appeals	
Effective Date:		
Revised Date:	6/13/17, 8/2019	
Forms:	Community Complaint Form	
Responsible: Program Directors, Executive Director		

Community Complaint Policy

Purpose/Introduction

INCA Community Services, Inc. strives to develop policies and procedures that erradic misunderstandings about programs and services. This policy is designed for the community members in our service area to fully understand the procedures of filing a complaint. The agency understands that not all decisions made by staff may be acceptable to the members within our community. We have developed this outlet in an effort to further investigate and recommend different outcomes for those community members who feel they have been wronged.

Policy

This policy describes how community members and/or program participants may present complaints about an agency program or staff member. It is the policy of the agency to resolve all complaints made by community members in a timely and effective manner and, as far as is practical, to the satisfaction of the complainant. This procedure is a problem-solving mechanism in which every attempt is made to resolve issues at the lowest level of authority, with the least possible amount of program disturbance. For staff grievances, staff members are referred to the employee grievance policy.

Informal Resolution Procedures

Complaints about local program issues or staff should be addressed using the informal resolution process first to examine the means of the complaint and to try to resolve the complaint to the satisfaction of the complainant and the program in which the complaint was issued.

The following process is a description on how informal complaints should be handled:

- Complaints about local program issues should be submitted first to the relevant staff person at the local center or office. Most complaints can be resolved by informal discussion between the complainant and the staff member or the local supervisor or other management staff in that location.
- Before a formal complaint can be filed, direct discussion must take place between the person(s) involved in the complaint. More than one attempt to resolve the problem or conflict must be taken by the parties involved. The date(s) and time(s) of the informal discussion shall be noted.

Formal Complaints

In the event that an informal resolution process cannot be achieved to a satisfactory stance with the member complaining formal steps will be taken. Any community member may use the formal complaint procedure after informal discussion process fails, but formal resolutions should not be used before the informal process can be investigated and rejected.

Formal complaints pertaining to staff or the program shall go immediately to the program director. Complaints relating to the program director shall go immediately to the executive director and complaints relating to the executive director will be taken to the Board of Directors.

There will be no retaliation against a complainant for using the complaint procedure. Such alleged action shall constitute grounds for a separate complaint.

Formal Complaint Procedures

The following procedures apply to processing a complaint which is not resolved locally.

Responsibility of the complainant:

- The person filing the complaint will put their complaint in writing using the agency's Community Complaint Form. Must have the complaining party's original, handwritten signature.
- The complaint must include information on how to contact the complaining party.
- The complaint must be specific and describe conditions or circumstances of their concern.
- No anonymous complaints will be accepted or considered.
- The complaint should be sent to the program director unless the complaint is against the program director in which case it will be sent to the Human Resource Director. The names and addresses for any of the above officials can be obtained by calling any of the local offices or at our website www.incacaa.org.
- Complaint Resolution Hierarchy
 - Originator
 - Supervisor, manager or coordinator/designee
 - Program Director
 - Human Resource Director
 - Executive Director

Responsibility of the Official Receiving the Complaint

- The Program Director or Human Resource Director will conduct a thorough investigation of the complaint which may include a meeting with the complainant. The content of all meetings will be kept confidential. They will then respond in writing to the complainant. This response should be in a timely manner and clearly state either:
 - That the official denies the validity of the complaint, or;
 - That a plan for corrective action has been designed and will be fully implemented in a prompt manner.

Right to Appeal

If the complainant disagrees with the results of the investigation they have a right to appeal the decision to the Executive Director. A letter must be submitted stating why the complainant feels the decision made was not satisfactory. All appeals must be mailed certified, return receipt requested, within twenty days after the events on which the complaint is based.

Final Appeal

After all local appeal procedures have been exhausted; an applicant may appeal the Contractor's decision to ODOC. In such cases, the Contractor and applicant shall provide ODOC with all relevant documentation.

Dissemination of Policy

The policy will be made available to all employees through the agency's website. The agency will educate and train employees and supervisors regarding the policy and any conduct that could constitute a violation of the policy.

Forms

- **Discrimination Complaint Form**
- **Sexual Harassment/Misconduct Complaint Form**
- **Community Complaint Form**



Discrimination Complaint Form Program Recipients, Vendors, or Public

The discrimination complaint form is for all persons (program recipients, vendors or public), who feel they have been discriminated against due to race, color, religion, sex, national origin, age, disability or genetic information. The procedure for filing a complaint of discrimination is described in INCA's Title VI, Equal Opportunity and Affirmative Action Plan. To get in touch with an EEO Officer, you may call INCA's Administrative Office at (580) 371-2352 or on INCA's Website at www.incacaa.org – Human Resource Tab, Title VI, Equal Opportunity Tab, Equal Opportunity and Affirmative Action Plan.

Complainant's Information		Filing Date:	
Full Name:			
Address:		City, State, Zip:	
Phone Number:		Other Phone Number:	
Email Address:			

Program, Location, and Individual that you believe committed the act(s) of discrimination			
Program:		Location:	
Individual(s):			

Have you tried to resolve the complaint with the program supervisor?	Yes	No
If yes, who did you discuss your complaint with?		
What is the current status of the complaint?		

When did the act(s) of discrimination occur: Date(s)	
--	--

Discrimination was because of (check all categories that apply to the act(s) of discrimination):			
	Race or Color	Please specify the racial or ethnic group:	
	Gender	Please indicate gender:	
	Sexual Harassment		
	Retaliation		
	Age	Please indicate your age:	

Disability	Please specify your disability and/or provide a brief description of its symptoms:	
National Origin	Please indicate your national Origin:	
Religion	Please indicate your religion:	
Veteran's Status		
Political Affiliation	Please indicate affiliation:	
Genetics		

Briefly describe the act(s) of discrimination: (Please include names, telephone numbers, and job titles of all persons involved in the discriminator acts you describe. Additional sheets may be attached.

- *For each action, please provide the following information:*
- *Date(s) the discriminatory action occurred;*
- *Names of individual(s) who discriminated;*
- *What happened;*
- *Witnesses, (if any);*
- *Why you believe the discrimination was because of race, sex, disability, or the basis indicated above or why you believe the action was retaliatory*

What action would you like the agency to take as a result of your complaint? What remedy are you seeking?

I affirm that the above information is true to the best of my knowledge, information, and belief:

Signed:		Date:	
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Sexual Harassment/Misconduct Complaint Form Staff, Program Recipients, Vendors, or Public

The sexual harassment complaint form is for all persons (program recipients, vendors or public), who feel they have been sexually harrassed or experienced sexual misconduct. The procedure for filing a complaint of sexual harassment complaint is described in INCA's. Title VI, Equal Opportunity and Affirmative Action Plan. To get in touch with an EEO Officer, you may call INCA's Administrative Office at (580) 371-2352 or on INCA's Website at www.incacaa.org – Human Resource Tab, Title VI, Equal Opportunity Tab, Equal Opportunity and Affirmative Action Plan.

COMPLAINANT'S INFORMATION		Filing Date:	
Full Name:			
Address:		City, State, Zip:	
Phone Number:		Other Phone Number:	
Email Address:			

Program, Location, and Individual that you believe committed the act(s) of sexual harassment or sexual misconduct.			
Program:		Location:	
Individual(s):			

Have you tried to resolve the complaint with the program supervisor?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
If yes, who did you discuss your complaint with?				
What is the current status of the complaint?				

When did the act(s) of harassment occur: Date(s)	
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Briefly describe the act(s) of sexual harassment/misconduct: (Please include names, telephone numbers, and job titles of all persons involved in the discriminator acts you describe. Additional sheets may be attached.)

What action would you like the agency to take as a result of your complaint? What remedy are you seeking?

--

I affirm that the above information is true to the best of my knowledge, information, and belief:

Complainant Signature:

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Date:

--

EEO Officer Signature:

--

Date:

--



Community Complaint Form

The Community Complaint Form is for all persons who feel they have been subjected to any type of harassment, who have a complaint against a staff member, who have been denied services, or who has a complaint against any of the programs or services offered within the facilities operated by INCA Community Services, Inc.. The procedure for filing a complaint is described in INCA's Title VI, Equal Opportunity and Affirmative Action Plan. To get in touch with an EEO Officer, you may call INCA's Administrative Office at (580) 371-2352 or on INCA's Website at www.incacaa.org – Human Resource Tab, Title VI, Equal Opportunity Tab, Equal Opportunity and Affirmative Action Plan.

Complainant's Information		Filing Date:	
Full Name:		Phone:	
Address:		City, State, Zip:	
Program:		Location:	

What is the nature of your concern? (use attachment if necessary)

I affirm that the above information is true to the best of my knowledge, information, and belief:

Signature :		Date:	
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Follow-Up and Conclusions	Date Received:

Signature/Title :		Date:	
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Attachments

- **Affirmative Action Goals, Timetable, and Evaluation Process**
- **Human Rights Committee Roster**
- **Map and Population Growth**
- **Board and Committee Representation**
- **Service Recipients/Clients Characteristics Report**
- **Employee Representation**
- **LEP Resource List**
- **Title VI Information**
- **Authorities**
- **Evaluation**
- **Title VI Program - JAMM Transit**

Affirmative Action Goals, Timetable, and Evaluation Process

Goals		Responsible Party	Target Date for Completion
I.	Continue to train Managers about equal opportunity legislation, policies, procedures, and best practices.	Equal Opportunity Officer Human Resource Manager Executive Director	On-going
II.	Continue to promote staff awareness of harassment and discrimination prevention policies and resolution procedure through information hand-outs and training sessions	Equal Opportunity Officer Human Resource Manager Executive Director	On-going Training will be provided to all staff on a yearly basis. New staff will be trained / made aware of our agency policies and procedures during intake and in the new employee orientation training.
III.	The ethnicity, sex, and age of staff, board, and policy members shall continue to reflect a ratio of minority persons at least proportionate to the poverty population served by the agency as closely as possible, within 5%.	Equal Opportunity Officer Human Resource Manager Program Directors Executive Director	On-going
IV.	Usage of Financial Manual for minority owned business and purchasing goods and services.	Executive Director All purchasing staff	On-going
V.	The Human Rights Committee will meet and update the agency Equal Opportunity and Affirmative Action Plan	Human Rights Committee Equal Opportunity Officer Executive Director	September 2024
VI.	Analysis of ethnicity and gender of persons serving on boards and committees will be completed.	Equal Opportunity Officer	October 2024
VII.	The updated Equal Opportunity and Affirmative Action Plan will be presented to the Board of Directors for Approval	Equal Opportunity Officer Executive Director	October 2024

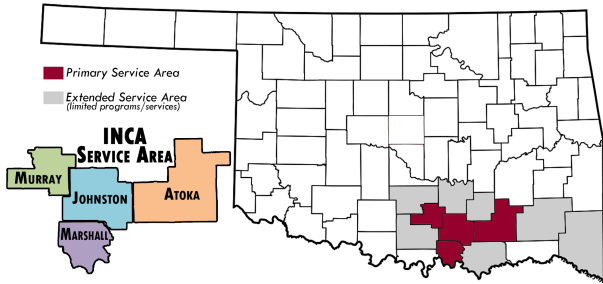
Human Rights Committee Roster

This committee shall review the determination of the Equal Opportunity Officer regarding complaints of discrimination and shall oversee the enforcement of the grantee's Affirmative Action Plan.

Barbara Talley	Murray County	Low Income
LaToya Davis	Johnston County	Low Income
Jackie Matthews	Marshall County	Low Income
Greg Davidson	Atoka County	Low Income
Shelley Prince	Atoka County	EEO Officer

*Meet when needed

Map and Population Growth



The service area consists of Johnston, Atoka, Marshall, and Murray Counties. The total population of these four counties in Oklahoma according to the 2020 census statistics was 54,222 and the estimated population of 2020 is 53,631. This demonstrates a growth of 591 in two years.

Johnston County	Atoka County	Marshall County	Murray County
Tishomingo Office Administrative Office 202 S. Capitol Tishomingo, OK 73460 (580) 371- 2352	Atoka Office 371 W. 10th Street Atoka, OK 74525 (580) 889-5193	Madill Office 18941 8th Street Madill, OK 73446 (580) 795-2372	Sulphur Office 1220 N. 9th Street Sulphur, OK 73086 (580) 622-5700
	INCA Clothing Bank 456 W. Liberty Rd. Atoka, OK 74525 (580) 889-6383		
	Antlers Clothing Bank 202 N. High Antlers, OK 74523 (580) 298-5671		

Head Start Centers

Milburn Head Start 200 N. 7th Street Milburn, OK 73450 (580) 443-5487	Atoka Head Start 371 W. 10th Street Atoka, OK 724525 (580) 889-5153	Kingston Head Start Kingston Public Schools North West and Main Kingston, OK 73439 (580) 443-5487	Davis Head Start 701 E. Benton Davis, OK 73070 (580) 584-4171
Mill Creek Head Start Mill Creek Public Schools 603 S. Choctaw Mill Creek, OK 74856 (580) 384-5333		Madill Head Start 209 N. 2nd Street Madill, OK 73446 (580) 795-3506	Sulphur Head Start 1220 W. 9th Street Sulphur, OK 73086 (580) 622-5206
Tishomingo Head Start 809 E. 6th Street Tishomingo, OK 73460 (580) 371-3680		Oakland Head Start Hwy. 70 and 8th Street Oakland, OK 73446 (580) 677-9444	
Wapanucka Head Start Wapanucka Public Schools 502 S. Choctaw Wapanucka, OK 73461 (580) 937-4581		Oakland Head Start (Building) 18961 8th Street Oakland, OK 73446 580-795-3060	

Board and Committee Representation

Analysis of ethnic representation of INCA's Boards and Committees:

Group	Caucasian	African American	Native American, Hispanic or Other	Total
Board of Directors	7	1	4	12
Human Rights Committee	3	1	1	5
RSVP/Transit Advisory Council	6	1	3	10
Head Start Policy Council	5	1	11	17
Total	21	4	19	44

Analysis of male and female representation of INCA's Boards and Committees:

Group	Male	Female	Total
Board of Directors	5	7	12
Human Rights Committee	1	4	5
RSVP/Transit Advisory Board	3	7	10
Head Start Policy Council	5	12	17
Total	14	30	44

Analysis of ethnic composition of INCA's Boards and Committees as compared to ethnic composition of the four-county population according to the last census data:

Ethnicity	Board/Committee Percentage	Population Percentage
Caucasian	48%	70%
African American	9%	2%
Native American, Hispanic, or Other	43%	28%

Service Recipients/Clients Characteristics Report

Analysis of ethnic representation of program participant characteristics:

All Programs	Caucasian	African American	Native American, Hispanic, or Other	Unknown	Total
HS, JAMM, RX OK, ESG, WX, RAVE, RSVP, & CSBG	1,089	61	384	440	1,974

Analysis of male and female program participant characteristics:

All Programs	Male	Female	Other/Unknown	Total
HS, JAMM, RX OK, ESG, WX, RAVE, RSVP, & CSBG	748	1,199	27	1,974

Analysis of ethnic composition of program participant characteristics compared to ethnic composition of the four-county population according to the last census data:

Ethnicity	Program Participants Percentage	Population Percentage
Caucasian	55%	70%
African American	3%	2%
Native American, Hispanic, & Other	19%	28%

Employee Representation

Analysis of ethnic representation of INCA employees:

Group	Caucasian	African American	Native American, Hispanic, or Other	Total
Employees in all Programs	145	11	35	191

Analysis of male and female representation of INCA employees:

Group	Male	Female	Total
Employees in all Programs	45	146	191

Analysis of ethnic composition of INCA employees as compared to ethnic composition of the four county population:

Ethnicity	INCA Employee Percentage	Population Percentage
Caucasian	76%	70%
African American	6%	2%
Native American, Hispanic, or Other	18%	28%

LEP Resources

Language Apps

Google Translate	Translates words you speak or type, can also use word lense which translates signs - 60 languages
iTranslate	Real-time spoken word translation application - 60 languages
Bing Translator	Keyboard, voice, and camera usage for translations - 43 languages
Jibbigo	Speech translation, application will translate aloud - 21 languages

Bilingual Staff	County	Phone Number	Language	Available Hours
Maria Barrientos	Marshall	580-795-2372	Spanish	8:00 - 3:00
Martha Ortiz	Marshall	580-795-2372	Spanish	8:00 - 3:00
Rocio Perez	Marshall	580-795-2372	Spanish	8:00 - 3:00
Jose Orta	Marshall	580-795-2372	Spanish	8:00 - 3:00
Stephanie De La Santos	Marshall	580-795-2372	Spanish	8:00 - 3:00
Samantha Gomez	Marshall	580-795-2372	Spanish	8:00 - 3:00
Adriana Prez	Marshall	580-795-2372	Spanish	8:00 - 3:00
Maria Salazar	Marshall	580-795-2372	Spanish	8:00 - 3:00

Other Translators	County	Phone Number	Language	Available Hours
Ermalinda Scroggins	Atoka	580-364-2333	Spanish	Varies
Veronica Armenta	Atoka	580-889-5193	Spanish	Varies
Nikki Wood	Atoka	580-239-0685	ASL	Varies
School for the Deaf	Murray	580-622-4900	ASL	Varies

Title VI Information

Locations of Title VI Postings

Title VI Posters are posted on bulletin boards or in other areas that are highly viewable by the public and staff members in Tishomingo, Atoka, Oakland, and Sulphur. They are placed in each of the JAMM Offices where drivers have easy access to them and posted in each of the JAMM vehicles for the public riders. Postings are in English and Spanish make the availability to the Limited English Proficiency population that resides within our areas.

Title VI Posting

YOUR RIGHTS UNDER TITLE VI OF THE CIVIL RIGHTS ACT OF 1964

“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.”

For further information, or if you feel that you have been discriminated against, please contact:

INCA Community Services, Inc.

Toll Free Number: 844-462-2457
TTY Line: 711

SUS DERECHOS BAJO EL TITULO VI DE LA LEY DE DERECHOS CIVILES DE 1964

“Ninguna persona en los Estados Unidos, en motivos de raza, color u origen nacional, se excluirá participación en, pueda negar los beneficios de o ser sometida a discriminación bajo ningún programa o actividad que reciba asistencia financiera Federal.”

Para más información o si siente que le ha sido discriminado por favor póngase en contacto con:

INCA Community Services, Inc.

Número de teléfono gratuito: 844-462-2457
Línea TTY: 711

Authorities

This agency will abide by the following authorities in implementation and operation of the Equal Opportunity and Affirmative Action Program. Listed authorities will be kept in a current file by the Equal Opportunity Officer. The Equal Opportunity Officer will keep the Executive Director and Human Rights Committee updated.

- Title VI of the Civil Rights Act of 1964, as amended.
- Title VIII of the Civil Rights Act of 1968, as amended.
- Economic Opportunity Act of 1964, as amended.
- The Rehabilitation Act of 1973, as amended. Sections 501, 502, and 504 (Prohibition of Discrimination Based on Disability).
- The Civil Rights Restoration Act of 1987.
- Title II of the Americans with Disabilities Act of 1990.
- Public Law 88-352, Title VI, Civil Rights Act of 1964 (42 U.S.C. Section 2000d).
- Title 45, Chapter X, Part 1010, Code of Regulations, Nondiscrimination in Federally Assisted Programs of Community Services Administration.
- OEO Instruction 6710-1 Change 6, Form 395, Grantee Refunding Certification. (See III)
- OEO Notice 6004-1, Requirement for Active Civil Rights Program.
- Public Law 92-261, The Equal Employment.
- Federal Transit Circular 4702.1A – Title VI and Title VI-Dependent Guidelines - Title VI Regulations at 49 CFR Part 21. DOT's Order on Environmental Justice (Order 5610.2), and Policy Guidance Concerning Recipient's Responsibilities to Limited English Proficient ("LEP") Persons (70 FR 74087, December 15, 2005)
- Any future equal employment opportunity legislation and/or directives.

Evaluation

As presented in our 2024-2025 Affirmative Action Plan, INCA Community Services, Inc. has a good diversity of ethnic groups represented within all programs, program participants, boards and committees.

The statistics gathered for our agency indicates that we continue to strive in all areas to ensure equal opportunity. (Agency goal is to be within 5%) There will be continued and on-going training with all managers and Program Directors to promote awareness, ensure proper procedure with hiring practices, and keep management informed of legislation, policies, and best practices.

Analysis of Ethnic Representation of INCA Boards and Committees compared to the composition of our four county populations - Our agency is on target staying within the goal of 5%. Caucasian members represent 48%, African American members represent 9% and Native American/Hispanic/Other members represent 43%. Women are well represented in this category.

Service Recipients/Clients Characteristic Report compared to the composition of our four county populations; our agency statically maintains our agency goal of staying within 5% of all populations being represented. Our Caucasian recipients were at 55%, our African American recipients were at 3%, and our Native American/Hispanic/Other recipients were at 19%. 22% of the service participants chose not to disclose their race. Women are well represented in this category.

Analysis of Ethnic Representation of INCA Employees compared to the composition of our four county populations; our current agency employees represent 76% in Caucasian employees, 6% in African American employees, and 18% in Native American/Hispanic/Other employees. Women are well represented in this category.

All new employees will receive training on INCA's personnel policy and procedures. New employees will also attend Orientation training on Affirmative Action, Discrimination, and Sexual Harassment.

A yearly legal notice has ran in all four counties stating INCA Community Services, Inc. will give all minority businesses opportunity for all of our programs contracts (DBE and WBE) and another legal notice was ran that the affirmation action plan is available for public viewing. All advertisements and job postings will specify that INCA Community Services is an Equal Opportunity Employer and an Equal Opportunity Service Provider.

Title VI Program - JAMM Transit

JAMM Transit filed the Title VI Program with the ODOT Office of Mobility and Public Transit on 04/24/2023 to meet compliance standards of Title VI and ODOT. This program documentation is being attached to the Affirmative Action Plan in order to satisfy all regulations for INCA Community Services, Inc.'s programs and service participants.



INCA Community Services, Inc.

Dbas: JAMM Transit

Title VI Program

Date filed with ODOT Office of Mobility and Public Transit:

04/24/2023

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A. Introduction

INCA Community Services, Inc. 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.

INCA Community Services, Inc. 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. INCA Community Services, Inc. further ensures every effort will be made to ensure non-discrimination in all programs and activities, whether those programs and activities are federally funded or not.

INCA Community Services, Inc. meets the objectives of the FTA Master Agreement which governs all entities applying for FTA funding, including JAMM Transit 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).

B. Agency Information

1. Mission of JAMM Transit

JAMM Transit is a rural public transportation system dedicated to providing excellence in transportation through mobility that promotes self-sufficiency, independence, and improves the quality of life while stimulating economic development with the provision of safe, reliable, affordable, and accessible transportation services to the public.

2. History (including year started)

JAMM Transit is a sub-division of INCA Community Services. JAMM Transit was formed in 1999 with the first Section 5311 Rural Transportation Grant through the Oklahoma Department of Transportation.

INCA Community Service, INC. is a Community Action Program originally formed in 1969 and restructured in 1971 to include Atoka, Marshall, Murray and Johnston Counties. INCA is incorporated under the laws of the State of Oklahoma as a non-profit organization.

3. Regional Profile (regional population; growth projection)

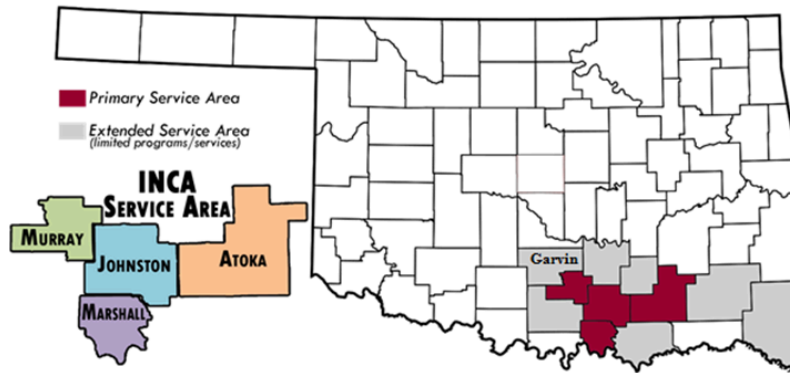
JAMM Transit operates in Johnston, Atoka, Marshall, and Murray Counties in southeast Oklahoma. The 2023 population for all four counties is 53,382 and the growth projection for 2040 is 59,201 a 10.9% increase.

4. Population served (in relation to regional population)

Within the counties served there is a population estimating at 54,941 people with 13,172 being persons over the age of 65 and 9,243 being considered disabled persons. Of the total population there is an estimated 26% of families living in poverty.

5. Service area (include map, with any routes utilized)

JAMM Transit operates non-emergency medical transports throughout each of the counties. There are town route services offered in the major cities of each of the counties to provide transportation access to those in need throughout the city limits.



6. Governing body make-up (include terms of office)

Board Member	County	Office Held	Sector	Term End
Tara Huddleston	Atoka	Chairperson	Private	01/2025
Chris Duroy	Johnston	Vice-Chairperson	Public	12/2024
Jesse Dunlap	Atoka		Public	01/2025
Veronica Labrada	Atoka		Low Income	11/2028
Roy Wayne Blevins	Johnston		Public	05/2024
Oma Dell Burns	Johnston		Private	07/2024
LaToya Davis	Johnson		Low Income	08/2023
Jena Newman	Marshall		Private	09/2024
Miranda Russell	Marshall		Low Income	01/2029
Kent McKinley	Murray		Public	10/2024
Rolanda Rogers	Murray		Private	02/2024
Marvin Wallace	Murray		Low Income	10/2024

C. Notice to the Public

<p style="text-align: center;">YOUR RIGHTS UNDER TITLE VI OF THE CIVIL RIGHTS ACT OF 1964</p> <p>“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.”</p> <p>For further information, or if you feel that you have been discriminated against, please contact:</p> <p style="text-align: center;">INCA Community Services, Inc.</p> <p style="text-align: center;">Toll Free Number: 844-462-2457 TTY Line: 711</p>	<p style="text-align: center;">SUS DERECHOS BAJO EL TITULO VI DE LA LEY DE DERECHOS CIVILES DE 1964</p> <p>“Ninguna persona en los Estados Unidos, en motivos de raza, color u origen nacional, se excluirá participación en, pueda negar los beneficios de o ser sometida a discriminación bajo ningún programa o actividad que reciba asistencia financiera Federal.”</p> <p>Para más información o si siente que le ha sido discriminado por favor póngase en contacto con:</p> <p style="text-align: center;">INCA Community Services, Inc.</p> <p style="text-align: center;">Número de teléfono gratuito: 844-462-2457 Línea TTY: 711</p>
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NOTICES TO THE PUBLIC: The notice is located in each of the transit agencies vehicles and in the main offices of each building facility where transit vehicles reside.

LOCATIONS:

Johnston County - 202 S Capital, Tishomingo, OK 73460

Atoka County - 371 W 10th Street, Atoka, OK 74525

Marshall County - 18941 8th Street, Oakland, OK 73446

Murray County - 1216 W 9th Street, Sulphur, OK 73086

D. Procedure for Filing a Title VI Complaint

Filing a Title VI Complaint

The complaint procedures apply to the beneficiaries of JAMM Transit's programs, activities, and services.

RIGHT TO FILE A COMPLAINT: Any person who believes they have been discriminated against on the basis of race, color, or national origin by JAMM Transit may file a Title VI complaint by completing and submitting the agency's JAMM Transit Title VI Complaint Form. Title VI complaints must be received in writing within 180 days of the alleged discriminatory complaint.

HOW TO FILE A COMPLAINT: Information on how to file a Title VI complaint is posted on our agency's website, and in public areas of our agency.

You may download JAMM Transit's Title VI Complaint Form at www.incacaa.org, or request a copy by writing to JAMM Transit, PO Box 807, Atoka, OK 74525. Information on how to file a Title VI complaint may also be obtained by calling JAMM Transit at 580-889-5193.

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

- Your name, address and telephone number.
- Specific, detailed information (how, why and when) about the alleged act of discrimination.
- Any other relevant information, including the names of any persons, if known, the agency should contact for clarity of the allegations.

Please submit your complaint form to JAMM Transit, PO Box 807, Atoka, OK 74525.

COMPLAINT ACCEPTANCE: JAMM Transit will process complaints that are complete.

Once a completed Title VI Complaint Form is received, JAMM Transit will review it to determine JAMM Transit has jurisdiction. The complainant will receive an acknowledgement letter informing them whether or not the complaint will be investigated by JAMM Transit.

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

If the requested information is not received within that time frame the case will be closed. Also, a case can be administratively closed if the complainant no longer wishes to pursue the case.

LETTERS OF CLOSURE OR FINDING: After the investigator reviews the complaint, the investigator will issue one of two letters to the complainant: a closure letter or 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 provides an explanation of the corrective action taken.

If the complainant disagrees with JAMM Transit's determination, the complainant may request reconsideration by submitting the request in writing to the Title VI investigator within seven (7) days after the date of the letter of closure or letter of finding, stating with specificity the basis for the reconsideration. JAMM Transit will notify the complainant of the decision either to accept or reject the request for reconsideration within ten (10) days. In cases where reconsideration is granted, JAMM Transit will issue a determination letter to the complainant upon completion of the reconsideration review.

A person may also file a complaint directly with the Federal Transit Administration, at the FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.

If information is needed in another language, JAMM Transit at 371 W 10th Street, Atoka, OK 74525, or at 580-889-5193.

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

Documenting Title VI Complaints/Investigations

All Title VI complaints will be entered and tracked in JAMM Transit'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.

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

Documenting Evidence of Agency Staff Title VI Training

JAMM Transit's staff is 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?
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 Participation Plan

Goal

The goal of the Public Participation 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:

- Board of Directors – the governing board of the agency. The role of the Board is to establish policy and direction for the agency. The Board defines the agency’s mission, establishes goals, and approves the budget to accomplish the goals.
- Advisory Bodies – non-elected advisory bodies review current and proposed activities of the agency, and are encouraged to be active in the agency’s public participation process. Advisory bodies provide insight and feedback to the agency.
- Agency Transit riders and clients.
- 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 Participation 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. Each year JAMM Transit will hold public forums to allow for the public an opportunity to participate in the development and review of the JAMM Transit program.

2. Public Engagement Process/Outreach Efforts:
 - a. Public meetings
 - b. Public hearings
 - c.
 - d. Surveys
 - e. Services for the Disabled
3. Public meetings and hearings will be accessible to public transit and compliant with the Americans with Disabilities Act or virtually to allow all members of the community to access the events easily.
4. 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. Telephone
 - vii. In person
5. Response to Public Input
6. 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

JAMM Transit ensures all outreach strategies, communications and public involvement efforts comply with Title VI. JAMM Transit's Public Participation 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, JAMM Transit provides the following:

- A. Title VI non-discrimination notice on the agency's JAMM Transit webpage and in all public transit vehicles.
- B. JAMM Transit communication materials in languages other than English.
- C. Services for Limited English Proficient persons. Upon advance notice, translators may be provided. See LEP Policy.

G. Language Assistance Plan

JAMM Transit Limited English Proficiency Plan

The Limited English Proficiency Plan has been prepared to address JAMM Transit's responsibility as a recipient of federal financial assistance as they relate to the needs of individuals with limited English proficiency language skills. The policy has been prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000D, et seq, and its implementing regulations, which state that no person shall be subjected to discrimination on the basis of race, color, or national origin.

Title VI of the 1964 Civil Rights Act is one of two federal mandates that guarantee the provision of meaningful access to federally-funded services for LEP individuals:

- Title VI of the 1964 Civil Right Act provides 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 otherwise subjected to discrimination under any program or activity that receives federal financial assistance. This includes meaningful access to LEP customers.
- President's Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency" (August 11, 2000): instructs federal agencies to improve access to services by mandating that any federally conducted or assisted programs of activities (i.e. recipients of federal funding) must provide meaningful access to LEP customers.

Plan Summary

INCA Community Services, INC. DMA JAMM Transit has developed this Limited Proficiency Plan to help identify reasonable steps for providing language assistance to persons with limited ENGLISH proficiency (LEP) who wish to access services provided. As defined in Executive Order 13155, 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, the ways in which assistance may be provided, staff who may need language assistance, the ways in which assistance may be provided, staff training that may be required, and how to notify LEP persons that assistance is available.

In order to prepare the plan, INCA Community Services, INC. DMA JAMM Transit used the four-factor LEP analysis which considers the following factors:

- The number of proportion LEP persons in the service area who may be served by JAMM Transit.
- The frequency with which LEP persons come in contact with JAMM Transit Services.
- The nature and importance of services provided by JAMM Transit to the LEP population.
- The interpretation services available to JAMM Transit and overall cost to provide LEP Assistance. A summary of the results of the four-factor analysis in the following section.

Meaningful Access: Four-Factor Analysis

- **The number or proportion of LEP persons in the service area who may be served or are likely to require JAMM Transit Services.**

JAMM Transit provides services in 4 Oklahoma counties. JAMM reviewed the 2021-American Community Survey from the U.S. Census Bureau and compiled the following statistics to identify the number or percentage of LEP persons eligible to be service or like to the encountered by JAMM Transit:

- It was determined out of the total service area with a population of 50,533 of

which 3,736 persons (7.4%) speak a language other than English and 1387 persons (2.7%) spoke English less than “very well”.

- Of those who spoke another language other than English 3086 (82.6%) spoke Spanish and 650 (17.4%) of Asian and Pacific Islanders.
- The majority of the persons who spoke a language other than English was concentrated in the Madill and Oakland City Limits in Marshall County with a population of 3,608. Of the 1306 (36%) who spoke languages other than Spanish 99% were Spanish speaking. JAMM services are being promoted to the Spanish speaking population in this area and anticipate the number to steadily increase.
- As indicated below, the remaining counties (Johnston, Atoka, and Murray counties) within the JAMM service area had 1,391 persons (2.75%) speak a language other than English. Of those 500 persons (1.38%) spoke English less than “very well”.
 - **Atoka County** - 13,301 population
 - Speak language other than English
 - Total: 507 (3.8%)
 - Speak English less than very well
 - Total: 124 (.9%)
 - Speaks Spanish
 - Total: 308 (2.3%)
 - Speaks Other than English
 - Total: 199 (1.4%)
 - **Johnston County** - 9,829 population
 - Speak language other than English
 - Total: 283 (2.8%)
 - Speak English less than very well
 - Total: 124 (1.2%)
 - Speaks Spanish
 - Total: 223 (2.2%)
 - Speaks Other than English
 - Total 60 (.6%)
 - **Murray County** - 12,971 population
 - Speak language other than English
 - Total: 601 (4.6%)
 - Speak English less than very well
 - Total: 252 (1.9%)
 - Speaks Spanish
 - Total: 381 (2.8%)
 - Speaks Other than English
 - Total: 220 (1.6%)
 - **Marshall County** - 14,432 population
 - Speak language other than English
 - Total: 2,345 (16.2%)
 - Speak English less than very well
 - Total: 887 (6.1%)
 - Speaks Spanish
 - Total: 2,174 (15%)
 - Speaks Other than English
 - Total: 171 (1.2%)
 - **City of Madill** - 3,608 population
 - Speak language other than English

- Total: 1306 (36%)
 - Speak English less than very well
 - Total: 625 (17.3%)
 - Speaks Spanish
 - Total 1298 (35.9%)
 - Speaks Other than English
 - Total: 8 (.2%)
- **The frequency with which LEP persons come in contact with JAMM Transit services.**

Staff reviewed the frequency with which the office staff and drivers have, or could have, contact with LEP persons. This includes documenting phone inquiries or office visits. Discussion during safety meetings with route supervisor and drivers. To date, JAMM Transit has minimal requests for interpreters and those have been in the Madill area where we have an interpreter on sight which can assist. All signage is in English and Spanish on vehicles and transit literature is available in Spanish. Throughout the majority of the service area office staff and drivers have had very little contact with LEP persons. Oftentimes they have had family members or friends to assist with translations.

- **The nature and importance of services provided by JAMM Transit to the LEP population.**

In the majority of JAMM Transit service areas there is no large geographic concentration of any type of LEP individuals. In these areas the overwhelming majority of the population speak English as their primary language. As a result, there are few social service, professional, and leadership organizations within these JAMM service areas that focus on outreach to LEP individuals that the agency is aware of.

In Madill and Oakland located in Marshall county there is a higher concentration of Spanish speaking individuals. In order to ensure that the higher LEP communities are able to fully benefit from our transit program, JAMM Transit has made a commitment to partner with community based organizations and other INCA programs that are able to share information about transit assistance and support to these community residents.

- **The resources available to JAMM Transit and overall cost to provide LEP assistance.**

JAMM Transit has assessed its available resources that could be used for providing LEP assistance, which of its documents and website information would be the most valuable to be translated or updated if the need should arise. JAMM Transit webpage is also available in 53 different languages.

The resources available for JAMM Transit to ensure that LEP groups are able to access or transit services include local community partnerships, multilingual staff, translations services available when needed and outreach through local community mead and outreach organizations. JAMM Transit maintains a list of local citizens that would be willing to provide voluntary translations in several languages spoken in the area if needed within a reasonable time period.

LEP Procedures

Identifying LEP Persons and Their Language

- JAMM will promptly identify the language and communication needs of the LEP person. If necessary, staff will use a language identification card (or “I speak cards”) or posters to determine the language.
- Records will be kept of past interactions with customers or family members about the language used to communicate with the LEP person.

Obtaining an Interpreter

The Title VI Coordinator will be responsible for:

- Advising staff members on Language Translation apps that can be used to translate quickly and efficiently.
- Maintaining a list showing the name, language, phone number, and hours of availability of all bilingual staff persons.
- Contact the appropriate bilingual staff member to interpret, in the event that an interpreter is needed, if an employee who speaks the needed language is available.
- Obtaining an outside interpreter if a bilingual staff or staff interpreter is not available or does not speak the needed language.
- The LEP may request to use a family member or friend as an interpreter, however it is not required that any person bring their own interpreter to receive services.

Provide Written Translations

- Documents will be translated into frequently-encountered languages as needed.
- The website is available in 53 languages.

Providing Notice to LEP Persons

INCA will inform LEP persons of the availability of language assistance, free of charge, by providing written notice in languages LEP persons will understand. At a minimum notices and signs will be posted and provided in foyers of county offices and website. Notification will also be provided through one or more of the following: outreach documents, advertisements, and/or community based events.

Monitoring Language Needs and Implementation

On an ongoing basis, INCA will assess changes in demographics, types of services or other needs that may require reevaluation of this policy and its procedures. In addition, INCA will regularly assess the efficacy of these procedures, including but not limited to mechanisms for securing interpreter services, equipment used for the delivery of language assistance, complaints filed by LEP persons, feedback from customers, and community organizations.

Documentation Required

Intake Form - An intake form will be completed on each person needing language assistance so the correct assistance can be identified.

H. Subrecipient Assistance

JAMM Transit does not have any subrecipients.

I. Subrecipient Monitoring

JAMM Transit does not have any subrecipients.

J. Equity Analysis of Facilities

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

ATTACHMENTS

Attachment 1 – Agency Information

INCA Community Services, Inc. is a private non-profit corporation. The agency was established in 1966 and serves Johnston, Atoka, Marshall and Murray Counties. The agency is the grantee for numerous federal and state programs. It operates and lends administrative support to a multi-program operation. Program services available are: Neighborhood Centers, Outreach and Referral Services, Community Food and Nutrition, Clothing Banks, Head Start Program, Weatherization, Housing, Revitalization, Retired Senior Volunteer Program, Homeless Assistance, Emergency Prescription Drug Program, Emergency Food and Shelter Program, Career Opportunities Workshop, and Transportation. The general purpose of INCA Community Services is to stimulate a better focus of all available resources upon the goal of enabling low-income families and low-income individuals of all ages and races in rural areas to attain the skills, knowledge, motivation and security to become self-sufficient.

INCA Community Services has been operating transportation services since 1972 and through those services we have gained experience in many areas. Currently JAMM Transit maintains a fleet of vehicles throughout the four county service area and has established routes and services in each of them.

JAMM Transit's governing body is a Board of Directors consisting of 12 voting members, three each from the four county service areas that include the low income sector, private sector, and public sector respectively.

Attachment 2 – Title VI Complaint Form



Title VI Discrimination Complaint Form Title VI - Program Recipients, Vendors, or Public

JAMM Transit is committed to ensuring that no person is excluded from participation in or denied the benefits of its services on the **basis of race, color, or national origin**, as provided by the Title VI of the Civil Rights Act of 1964, as amended. The Title VI complaints must be filed within 180 calendar days from the date of the alleged discrimination. Completed forms must be submitted to JAMM Transit. If you require any assistance in filling out this form please contact the EEO Officer at 580-889-5193.

Complainant's Information		Filing Date:	
Full Name:			
Address:		City, State, Zip:	
Home Phone:		Work Phone:	
Email Address:			

Indicate on what grounds you believe you have been discriminated against (check all that apply):

<input type="checkbox"/>	Race	<input type="checkbox"/>	Color	<input type="checkbox"/>	National Origin
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Indicate the person(s) who you believe discriminated against you:

Name(s):	
Work Location (if Known):	
Work Phone:	
Date of alleged incident:	

If you have an attorney representing you concerning the matters raised in this complaint, please provide the following:

Name:	
Address:	
Work Phone:	
Email Address:	

Explain why you believe discrimination has occurred. If there are witnesses, please provide names, addresses, and telephone numbers. Be sure to include how other people were treated differently than you. Attach additional pages as necessary and any written material pertaining to your case.

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What remedy are you requesting? Please be specific:

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Have you filed or do you intend to file a charge or complaint concerning the matters raised in this complaint with any other agencies (Federal, State, or Local):

Yes	No
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If so, please provide the following information:

Agency:	
Address:	
Name of Investigator (if known):	
Phone Number:	
Email Address:	
Date Filed:	
Status of Case:	

I confirm that the above information is true to the best of my knowledge, information, and belief:

Print or type name of complainant:

Signed:		Date:	
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JAMM Transit ensures that no person or groups of persons shall, on the grounds of race, color, sex, religion, national origin, age, disability, retaliation or genetic information, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any and all programs, services, or activities administered by ODOT, its recipients, sub-recipients, and contractors.

Group	Caucasian	African American	Native American, Hispanic or Other	Total
Board of Directors	8	1	3	12
Human Rights Committee	3	2	1	6
Transit Advisory Committee	8	1	1	10

Group	Male	Female	Total
Board of Directors	7	5	12
Human Rights Committee	3	3	6
Transit Advisory Committee	1	9	10

Attachment 4 – Board Minutes

INCA COMMUNITY SERVICES, INC.

Board of Directors Minutes

April 24, 2023 - 5:00 P.M.

202 S. Capitol, P.O. Box 68
Tishomingo, Oklahoma 73460
580-371-2352

Chairperson Tara Huddleston called the meeting to order at 5:20 p.m.

Chairperson Tara Huddleston called for a Roll Call Vote to establish a quorum.

Present: Tara Huddleston, Jena Newman, Latoya Davis, Oma Dell Burns, Jesse Dunlap, Roy Wayne Blevins, Rolanda Rogers

Absent: Veronica Labrada, Marvin Wallace, Miranda Russell, Kent McKinley

Quorum established.

Staff Present:

On-site: Erica Pogue, Amber Freeman, Wanda Gray, Shawna Latham, JoAnn Barnes

Zoom: Kathy Castleberry, Kristy Mobbs, Lori Turman, LaQuita Thornley

Consultants Present:

Zoom: Lowell Wright, Financial Consultant

Community Services Director, Wanda Gray presented the ESG program highlight training and customer satisfaction survey results with analysis to the Board of Director members. Discussion was had, staff addressed any questions, and noted program feedback from the Board members.

Chairperson, Tara Huddleston asked for a motion on the corrected February 2023 Minutes. Roy Wayne Blevins made a motion to approve. Jesse Dunlap seconded the motion. Roll call vote: 7 Yes, 0 No, 0 Abstain

Chairperson, Tara Huddleston asked for a motion on the March 2023 Minutes. Oma Dell Burns made a motion to approve with a correction to the agenda from 2022 to 2023. Rolanda Rogers seconded the motion. Roll call vote: 7 Yes, 0 No, 0 Abstain

Financial Consultant, Lowell Wright presented the Financial Report for March 2023. Discussion was had. Chairperson, Tara Huddleston asked for a motion. Roy Wayne Blevins made a motion to approve. Jesse Dunlap seconded the motion. Roll call vote: 7 Yes, 0 No, 0 Abstain

Executive Director, Erica Pogue and Financial Director, JoAnn Barnes presented the budget for the CSBG 22 line item budget revision. Discussion was had. Chairperson, Tara Huddleston asked for a motion. Rolanda Rogers made a motion to approve. Latoya Davis seconded the motion. Roll call vote: 7 Yes, 0 No, 0 Abstain

Community Services Director, Wanda Gray presented the Permission to Apply for ESG grant in the amount of \$100,000.00. Discussion was had. Chairperson, Tara Huddleston asked for a motion. Latoya Davis made a motion to approve. Jena Newman seconded the motion. Roll call vote: 7 Yes, 0 No, 0 Abstain

Executive Director, Erica Pogue presented Permission to apply for JAMM Transit 5339(a) grant in the amount of \$178,980.00. Discussion was had. Chairperson Tara Huddleston asked for a motion. Roy Wayne Blevins made a motion to approve. Jena Newman seconded the motion. Roll call vote: 7 Yes, 0 No, 0 Abstain

Associate Director, Amber Freeman presented the Overview of organization, History, and Community Action training to the Board of Director members.

Executive Director, Erica Pogue, presented Policies and Procedures: Whistleblower Policy and JAMM Title VI. The Planning Committee met prior to the Board of Directors meeting and member Oma Dell Burns made a recommendation to approve the policies and procedures. Discussion was had. Chairperson Tara Huddleston asked for a motion. Rolanda Rogers made a motion to approve. Jena Newman seconded the motion. Roll call vote: 7 Yes, 0 No, 0 Abstain

Executive Director Erica Pogue, presented Job Descriptions: Strategic Advisor and Transit Administrative Assistant. The Planning Committee met prior to the Board of Directors meeting and member Rolanda Rogers made a recommendation to approve the job descriptions. Discussion was had. Chairperson Tara Huddleston asked for a motion. Oma Dell Burns made a motion to approve. Jena Newman seconded the motion. Roll call vote: 7 Yes, 0 No, 0 Abstain

RSVP Program Director, Shawna Latham, informed the Board members of various volunteer events and projects taking place, and updated the members on the produce pop-up project including how many have been served, and volunteer recruitment and impact activities. Shawna encouraged the members to engage with RSVP on social media.

Associate Director, Amber Freeman highlighted INCA's social media presence and ROMA goals. Amber also informed members of reestablishment of the INCA Informer, the agency quarterly newsletter, and highlighted program impact and accomplishments from the first quarter of 2023 and encouraged members to share and utilize the newsletter as a INCA ambassador tool. Amber reminded the members that May is Community Action month and encouraged members to engage with INCA on social media and in their communities.

Our Mission | INCA Community Services, Inc. shall operate programs to alleviate the causes of poverty and enhance the public health and welfare by opening to everyone the opportunity to work, have safe and affordable housing, transportation, training and education, and live in decency and dignity.

Head Start/Early Head Start Director, Kathy Castleberry informed members that the updated CACFP Report was located in the packet. Kathy also highlighted the new management staff in the program and gave a brief description of each position's role and the new staff member background. Kathy introduced the new Education Manager, Lori Turman and gave her a chance to meet and introduce herself to the members. Kathy also highlighted the Data training certification program herself and other staff are completing at this time.

Community Services Director, Wanda Gray reviewed the Johnston Virtual LIFT Field Site Visit Final Results to the members and plans to address the corrections recommended. Wanda also informed members of the upcoming CSBG Monitoring.

RAVE Program Director, Kristy Mobbs informed the members of updates from the program and that she has been working on getting all required documents and contracts switched from LaQuita's name to Erica's.

Executive Director, Erica Pogue highlighted items in the board report, including the staffing report for HR. Erica gave a brief overview of the new hires and recent terminations. Erica also discussed housing and JAMM Transit.

Chairperson Tara Huddleston called for adjournment. All in favor.

Meeting Adjourned.

Next meeting will be May 22, 2023 at 5:30 p.m. There will be a Finance Committee Meeting prior.

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