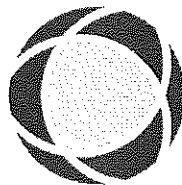


Title VI

2018 – 2020 Implementation Plan

Title VI of the Civil Rights Act of 1964

Mosaic Community Services



Mosaic
COMMUNITY SERVICES

PART OF THE SHEPPARD PRATT HEALTH SYSTEM

Adopted date

August 21, 2017

TABLE OF CONTENTS

Chapter Number	Chapter Title
I.	Introduction
II.	Overview of Services
III.	Policy Statement and Authorities
IV.	Annual Nondiscrimination Assurance to MTA
V.	Plan Approval Document
VI.	Organization and Title VI Program Responsibilities
VII.	General Reporting Requirements
VIII.	APPENDICES
	A Title VI Notice to the Public; List of Locations
	B Title VI Complaint Form
	C Investigations, Lawsuits and Complaints Document/Log
	D Public Participation Plan (PPP)
	E Language Access Plan (LAP)
	F Priority Diagnosis for Service Eligibility
	G Table – Minority representation on Committees by Race
	H Board Resolution approving plan

MOSAIC COMMUNITY SERVICES, INC.
Policy and Procedure Manual

Policy Number: **005**
Subject: **Non Discrimination Policy -Title VI Plan**
Version Effective Date: **August 21, 2017**
Prepared by: **Diane Maistros**
Approval: _____
Executive Director

This policy applies to the following programs: **All Mosaic Programs**

Policy

It is Mosaic Community Services, Inc.'s philosophy and policy to engage referrals for service and recipients of services without regard to race, color, sex, sexual orientation, religion, national origin, age, veteran status, disability, or other category protected by law. Discrimination against any client or referral based on any of these conditions will not be allowed or tolerated. Clients will have access to all services without regard to race, color, sex, sexual orientation, religion, national origin, age, veteran status, disability, or other category protected by law. Referrals for services or clients receiving services who express concerns regarding this policy will be directed to Mosaic Community Service's Client Complaint and Grievance Process.

I. INTRODUCTION:

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that "no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance." (42 U.S.C. Section 2000d).

The Civil Rights Restoration Act of 1987 clarified the intent of Title VI to include all program and activities of Federal-aid recipients, sub-recipients, and contractors whether those programs and activities are federally funded or not.

Recently, the Federal Transit Administration (FTA) has placed renewed emphasis on Title VI issues, including environmental justice in the transportation planning and programming, and providing meaningful access to persons with Limited English Proficiency.

Recipients of public transportation funding from FTA and the Maryland Transit Administration (MTA) are required to develop policies, programs, and practices that ensure that federal and state transit dollars are used in a manner that is nondiscriminatory as required under Title VI.

This document details how **Mosaic Community Services, Inc.** incorporates nondiscrimination policies and practices in providing transportation services to the public.

II. OVERVIEW OF SERVICES

Our mission: *Mosaic Community Services transforms lives through comprehensive health services for people with mental illness and addictions.*

Mosaic Community Services, a 501(c)3 nonprofit, is the largest community-based behavioral health service provider in Maryland, was founded in 1984. Mosaic is headquartered in Timonium, Maryland and has service sites in Aberdeen, Belcamp, Catonsville, Dundalk, Rosedale, Towson, Baltimore City, and Westminster. Its clients, almost 600 of whom reside in Mosaic housing, live throughout the Baltimore Metropolitan area, Carroll County and Harford County. Mosaic serves individuals with severe mental health and/or addiction issues:

- Behavioral Health Clinics
- Psychiatric Rehabilitation Programs
- Child & Adolescent In-home Rehabilitation
- Addiction Recovery Services
- Supported employment
- Supported housing
- Integrated Health
- Behavioral Health Home
- Targeted Case Management
- Capitation Program
- Off-Site Counseling (Baltimore City)
- Information and referral (Carroll County)
- Veteran Services

Mosaic is accredited by the Commission on the Accreditation of Rehabilitation Facilities (CARF). Its programs are licensed and/or approved by the Maryland Department of Health and Mental Hygiene, Department of Human Resources and/or local licensing agencies. Mosaic was honored by Maryland Nonprofits with a Standards of Excellence Award acknowledging Mosaic outstanding management and governance. Mosaic is certified by the Maryland Department of Transportation as a Minority Business Enterprise/ Disadvantaged Business Enterprise Program.

Mosaic has been providing transportation for its clients for over two decades. With program sites, houses and apartments located in Aberdeen, Belcamp, Catonsville, Dundalk, Randallstown, Rosedale, Towson, Baltimore City, and Westminster, Mosaic's buses and vans travel extensively throughout the day transporting clients. Mosaic's 5310 buses are used to transport clients to our

day programs (PRPs). Clients become eligible for transportation services when they apply for and are accepted to services at our Day programs.

The criteria to be eligible for day program services include the following:

- Must be referred by a licensed clinician
- Must have Medicaid or pay privately for services
- Must have a Priority Diagnosis as listed in Appendix F

Once accepted for day program services, transportation services will be determined based on need and availability of seats in a service route area. We reassess our routes as necessary to make transportation availability a priority.

III. Policy Statement and Authorities

Mosaic Community Services, Inc. is committed to ensuring that no person shall, on the grounds of race, color, national origin, as provided by Title VI of the Civil Rights Act of 1964 and the Civil Rights Restoration Act of 1987 (PL 100.259), be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity, whether those programs and activities are federally funded or not.

Mosaic Community Services, Inc. Title VI Manager is responsible for initiating and monitoring Title VI activities, preparing required reports, and other responsibilities as required by Title 23 Code of Federal Regulations (CFR) Part 200, and Title 49 CFR Part 21.

Signature of Authorizing Official (Board Secretary)

8/21/2017

Date

Authorities

Title VI of the 1964 Civil Rights Act provides that no person in the United States shall, on the grounds of race, color, national origin, or sex, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving federal financial assistance (refer to 49 CFR Part 21). The Civil Rights Restoration Act of 1987 broadened the scope of Title VI coverage by expanding the definition of the terms "programs or activities" to include all programs or activities of Federal Aid recipients, sub recipients, and contractors, whether such programs and activities are federally assisted or not.

Additional authorities and citations include: Title VI of the Civil Rights Act of 1964 (42 U.S.C. Section 2000d); Federal Transit Laws, as amended (49 U.S.C. Chapter 53 et seq.); Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 U.S.C. 4601, et seq.); Department of Justice regulation, 28 CFR part 42, Subpart F, "Coordination of Enforcement of Nondiscrimination in Federally-Assisted Programs" (December 1, 1976, unless otherwise noted); U.S. DOT regulation, 49 CFR part 21, "Nondiscrimination in Federally-Assisted Programs of the Department of Transportation—Effectuation of Title VI of the Civil Rights Act of 1964" (June 18, 1970, unless otherwise noted); Joint FTA/Federal Highway Administration (FHWA) regulation, 23 CFR part 771, "Environmental Impact and Related Procedures" (August 28, 1987); Joint FTA/FHWA regulation, 23 CFR part 450 and 49 CFR part 613, "Planning Assistance and Standards," (October 28, 1993, unless otherwise noted);

U.S. DOT Order 5610.2, "U.S. DOT Order on Environmental Justice to Address Environmental Justice in Minority Populations and Low-Income Populations," (April 15, 1997); U.S. DOT Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient Persons, (December 14, 2005), and Section 12 of FTA's Master Agreement, FTA MA 13 (October 1, 2006).

IV. ANNUAL NONDISCRIMINATION ASSURANCES TO MTA

In accordance with 49 CFR Section 21.7(a), every application for financial assistance from the Federal Transit Administration (FTA) must be accompanied by an assurance that the applicant will carry out the program in compliance with DOT's Title VI regulations. This requirement is fulfilled when the Maryland Transit Administration (MTA) submits its annual certifications and assurances to FTA. The MTA shall collect Title VI assurances from sub recipients prior to passing through FTA funds.

As part of the Certifications and Assurances submitted to MTA at the time of grant application and award, **Mosaic Community Services, Inc.** submits a Nondiscrimination Assurance which addresses compliance with Title VI as well as nondiscrimination in hiring (EEO) and contracting (DBE), and nondiscrimination on the basis of disability (ADA).

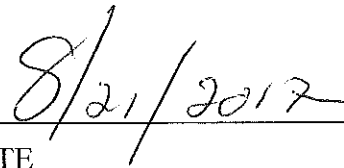
In signing and submitting the assurance, Mosaic Community Services, Inc. confirms to MTA our commitment to nondiscrimination and compliance with federal and state requirements.

V. PLAN APPROVAL DOCUMENT

I hereby acknowledge the receipt of the Mosaic Community Services, Inc. Title VI Implementation Plan 2018-2020. I have reviewed and approve the Plan. I am committed to ensuring that no person is excluded from participation in, or denied the benefits of Mosaic Community Services, Inc. transportation services on the basis of race, color, or national origin, as protected by Title VI according to C 4702.1B Title VI requirements and guidelines for Federal Transit Administration sub-recipients.



Signature of Authorizing Official
Jeff Richardson, Executive Director
Mosaic Community Services, Inc.



DATE

NOTE: A copy of the meeting minutes, resolution or other documentation showing that the board of directors or appropriate governing entity of official(s) responsible for policy decisions has reviewed and approved the Title VI Program is attached in Appendix H.

VI. Organization and Title VI Program Responsibilities

Under the authority of **Mosaic Community Services Inc.**'s CEO, the **Chief Compliance Officer or designee (Title VI Manager)** is responsible for ensuring implementation of the agency's Title VI program. Title VI program elements are interrelated and responsibilities may overlap. The specific areas of responsibility have been delineated below for purposes of clarity.

Overall Organization for Title VI

The Title VI Manager and staff are responsible for coordinating the overall administration of the Title VI program, plan, and assurances, including complaint handling, data collection and reporting, annual review and updates, and internal education.

Title VI Manager Responsibilities

The Title VI Manager is charged with the responsibility for implementing, monitoring, and ensuring compliance with Title VI regulations. Title VI responsibilities are as follows:

1. Process the disposition of Title VI complaints received.
2. Collect statistical data (race, color or national origin) of participants in and beneficiaries of agency programs, (e.g., affected citizens, and impacted communities).
3. Conduct annual Title VI reviews of agency to determine the effectiveness of program activities at all levels.
4. Conduct Title VI reviews of construction contractors, consultant contractors, suppliers, and other recipients of federal-aid fund contracts administered through the agency.
5. Conduct training programs on Title VI and other related statutes for agency employees.
6. Prepare a yearly report of Title VI accomplishments and goals, as required.
7. Develop Title VI information for dissemination to the public client group(s) served and, where appropriate, in languages other than English.
8. Identify and eliminate discrimination.
9. Establish procedures for promptly resolving deficiency status and writing the remedial action necessary, all within a period not to exceed 90 days.

General Title VI Responsibilities of the Agency

The Title VI Manager is responsible for substantiating that these elements of the plan are appropriately implemented and maintained, and for coordinating with those responsible for public outreach and involvement and service planning and delivery.

1. Data collection

To ensure that Title VI reporting requirements are met, **Mosaic Community Services, Inc.** maintains:

- A database of complaints received. The investigation of and response to each complaint is tracked within an electronic case management system (I-sight). This case management system contains all reported complaints and grievances including service related complaints and concerns related to Title VI.
- A report of activities undertaken to ensure (based on any complaints) that minority and low-income people have a meaningful access to these services.

2. Annual Report and Updates

As a subrecipient, **Mosaic Community Services, Inc.** is required to submit a Quarterly Report Form to the MTA that documents any Title VI complaints received during the preceding quarter and for each year. **Mosaic Community Services, Inc.** will also maintain and provide to the MTA on an annual basis, the log of public outreach and involvement activities undertaken to ensure that client minority and low-income people have had meaningful access to these activities.

Further, **Mosaic Community Services, Inc.** submits to MTA updates to any of the following items since the previous submission as it relates to 5310 vehicles or a statement to the effect that these items have not been changed since the previous submission, indicating date.

- A copy of any compliance review report for reviews conducted in the last three years, along with the purpose or reason for the review, the name of the organization that performed the review, a summary of findings and recommendations, and a report on the status or disposition of the findings and recommendations
- Public Participation Plan (PPP)
- Language Assistance Plan (LAP)
- Procedures for tracking and investigating Title VI complaints
- A list of 5310 vehicle related Title VI investigations, complaints or lawsuits filed with the **Mosaic Community Services, Inc.** since the last submission
- A copy of **Mosaic Community Services Inc.**'s agency's notice to the public that it complies with Title VI and instructions on how to file a discrimination complaint
- Minority representation on Committees by race

3. Annual review of Title VI program

Each year, in preparing for the Annual Report and Updates, the Title VI Manager will review agency operational guidelines and publications, including those for contractors, to verify that Title VI language and provisions are incorporated, as appropriate.

4. Dissemination of information related to the Title VI program

Information on **Mosaic Community Services, Inc.**'s Title VI program is to be disseminated to agency employees, contractors, and beneficiaries, as well as to the clients receiving services from Mosaic, as described in the public outreach and involvement section of this document, and in other languages when needed according to the LAP plan as well as federal and State laws/regulations.

5. Resolution of complaints

Any individual may exercise his or her right to file a complaint with **Mosaic Community Services, Inc.** if that person believes that s/he or any other program beneficiaries have been subjected to unequal treatment or discrimination in the receipt of benefits/services or prohibited by non-discrimination requirements. **Mosaic Community Services, Inc.** will report complaints associated with the 5310 vehicles to the MTA within three business days (per MTA requirements), and make a concerted effort to resolve complaints locally, using the agency's **Policy #003 Client Complaint and Grievance Process**. All Title VI complaints related to the 5310 vehicles and their resolution will be logged as described under Element 1, "Data collection" and reported annually (in addition to immediately) to MTA.

6. Written policies and procedures

Our Title VI policies and procedures are documented in this plan and its appendices and attachments. This plan will be updated periodically to incorporate changes and additional responsibilities that arise. During the course of the Annual Title VI Program Review (Element 3 above), the Title VI Manager will determine whether or not an update is needed.

7. Internal education

Our employees will receive training on Title VI policies and procedures upon hiring and upon promotion. This training will include requirements of Title VI, our obligations under Title VI (LEP requirements included), required data that must be gathered and maintained. In addition, training will be provided when any Title VI-related policies or procedures change (agency-wide training), or when appropriate in resolving a complaint.

Title VI training is the responsibility of the Training Director.

8. Title VI clauses in contracts

In all Federal procurements requiring a written contract or Purchase Order (PO), Mosaic Community Services, Inc.'s contract/PO will include the non-discrimination clause. The Title VI Manager will work with the **Purchasing Manager** who is/are responsible for procurement contracts and PO's to ensure appropriate Federal non-discrimination clauses are included. Non-Discrimination Clause.

Mosaic Community Services, Inc. is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services on the basis of race, color or national origin, as protected by Title VI of the Civil Rights Act of 1964.

VII. GENERAL REPORTING REQUIREMENTS

REQUIREMENT TO PROVIDE A TITLE VI PUBLIC NOTICE

Title 49 CFR Section 21.9(d) requires recipients to provide information to the public regarding the recipient's obligations under DOT's Title VI regulations and apprise members of the public of the protections against discrimination afforded to them by Title VI. At a minimum, **Mosaic Community Services, Inc.** shall disseminate this information to the public by posting a Title VI notice on the agency's website, in public areas of the agency's office(s), including the reception desk, meeting rooms, in all Federally-funded vehicles, etc. See Appendix A.

TITLE VI COMPLAINT PROCEDURES

REQUIREMENT TO DEVELOP TITLE VI COMPLAINT PROCEDURES AND COMPLAINT FORM.

In order to comply with the reporting requirements established in 49CFR Section 21.9(b), **Mosaic Community Services, Inc.** shall develop procedures for investigating and tracking Title VI complaints filed against us and will make this procedures for filing a complaint available to members of the public. **Mosaic Community Services, Inc.** has also developed a Title VI complaint form. The form and procedure for filing a complaint are available on the **Mosaic Community Services, Inc.** website and at their facilities.

Any individual may exercise his or her right to file a complaint with Mosaic Community Services, Inc. if that person believes that he or she have been subjected to unequal treatment or discrimination in the receipt of benefits or services. We will report the complaint to the MTA within three business days (per MTA requirements), and make a concerted effort to resolve complaints locally, using the agency's Nondiscrimination Complaint Procedures. All Title VI complaints and their resolution will be logged and reported annually (in addition to immediately) to MTA.

A person may also file a complaint directly with the Federal Transit Administration, Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th floor – TCR, 1200 New Jersey Avenue SE, Washington, DC 20590.

Mosaic Community Services, Inc. includes the following language on all printed information materials, on the agency's website, in press releases, in public notices, in published documents, and on posters on the interior of each vehicle operated in passenger service:

Mosaic Community Services, Inc. is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transportation services on the basis of race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1B. For additional information on Mosaic Community Services, Inc.'s nondiscrimination policies and procedures, or to file a complaint, please visit the website at mosaicinc.org or

contact Title VI Manager, Mosaic Community Services, 1925 Greenspring Drive, Timonium, MD 21093.

A copy of Mosaic Community Services' Title VI Complaint Form is attached as APPENDIX B.

Procedures for Handling and Reporting Investigations/Complaints and Lawsuits

Instructions for filing Title VI complaints are posted on the agency's website and provided below. Should any Title VI investigations be initiated by FTA or MTA, or should any Title VI lawsuits be filed against **Mosaic Community Services, Inc.**, the agency will follow these procedures:

Procedures

1. Any individual, group of individuals or entity that believes they have been subjected to discrimination on the basis of race, color, or national origin may file a written complaint with the Title VI Manager.
2. You may file a complaint with the Agency Title VI Manager if you believe you have been denied the benefits of the Language Assistance Plan (LAP) – Appendix B.

Complaints are to be filed in the following manner:

- a. A formal complaint must be filed within 180 calendar days of the alleged occurrence.
- b. The complaint should include:
 - complainant's name, address, and contact information (i.e., telephone number, email address, etc.)
 - date(s) of the alleged act of discrimination (if multiple days, include the date when the complainant(s) became aware of the alleged discrimination and the date on which the alleged discrimination was discontinued or the latest instance)
 - description of the alleged act of discrimination
 - location(s) of the alleged act of discrimination (include vehicle number if appropriate)
 - explanation of why the complainant believes the act to have been discriminatory on the basis of race, color, or national origin
 - if known, the names and/or job titles of those individuals perceived as parties in the incident
 - contact information for any witnesses
 - indication of any related complaint activity (i.e., was the complaint also submitted to MTA or FTA?)
- c. The complaint shall be submitted to the Title VI Manager at **8003 Corporate Drive, Nottingham MD 21236 and/or titlevimanager@mosaicinc.org.**

- d. In the case where a complainant is unable or incapable of providing a written statement, a verbal complaint of discrimination may be made to the Title VI Manager.
3. Upon receipt of the complaint, the Title VI Manager will immediately:
 - a. notify MTA (no later than 3 business days from receipt)
 - b. notify **Mosaic Community Services, Inc.** Authorizing Official
 - c. Insure that the complaint is entered in the complaint database.
 4. Within 3 business days of receipt of the complaint, the Title VI Manager will contact the complainant by telephone to set up an interview.
 5. The complainant will be informed that they have a right to have a witness or representative present during the interview and can submit any documentation he/she perceives as relevant to proving his/her complaint.
 6. If MTA has assigned staff to assist with the investigation, the Title VI Manager will offer an opportunity to participate in the interview.
 7. The alleged discriminatory service or program official will be given the opportunity to respond to all aspects of the complainant's allegations.
 8. The Title VI Manager will determine, based on relevancy or duplication of evidence, which witnesses will be contacted and questioned.
 9. The investigation may also include:
 - a. investigating contractor operating records, policies or procedures
 - b. reviewing routes, schedules, and fare policies
 - c. reviewing operating policies and procedures
 - d. reviewing scheduling and dispatch records
 - e. observing behavior of the individual whose actions were cited in the complaint.
 10. All steps taken and findings in the investigation will be documented in writing and included in the complaint file.
 11. The Title VI Manager will contact the complainant at the conclusion of the investigation (but prior to writing the final report) and give the complainant an opportunity to give a rebuttal statement at the end of the investigation process.
 12. At the conclusion of the investigation and **within 60 days** of the interview with the complainant, the Title VI Manager will prepare a report that includes a narrative description of the incident, identification of persons interviewed, findings, and recommendations for disposition. This report will be provided to the Authorizing Official, the MTA, and if appropriate our legal counsel.
 13. The Title VI Manager will send a letter to the complainant notifying them of the outcome of the investigation. If the complaint was substantiated, the letter will indicate the course of action that will be followed to correct the situation. If the complaint is determined to be unfounded, the letter will explain the reasoning, and refer the complainant to MTA in the event the complainant wishes to appeal the determination. This letter will be copied to MTA.

14. A complaint may be dismissed for the following reasons:

- a. the complainant requests the withdrawal of the complaint
- b. an interview cannot be scheduled with the complainant after reasonable attempts
- c. The complainant fails to respond to repeated requests for additional information needed to process the complaint

TRANSPORTATION-RELATED TITLE VI INVESTIGATIONS, COMPLAINTS, AND LAWSUITS

Background

All sub-recipients shall prepare and maintain a list/log of any of the following that allege discrimination on the basis of race, color, or national origin:

- Active investigations conducted by FTA and entities other than FTA;
- Lawsuits; and
- Complaints naming the recipient.

This list/log shall include the date that the transportation-related Title VI investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by the recipient in response, or final findings related to the investigation, lawsuit, or complaint. This list/log shall be included in the Title VI Program submitted to MTA every three years and information shall be provided to MTA quarterly and annually. Log is Appendix C.

PUBLIC OUTREACH AND INVOLVEMENT – Public Participation Plan

Introduction

The Public Participation Plan (PPP) is a guide for ongoing public participation endeavors. Its purpose is to ensure that **Mosaic Community Services** utilizes effective means of providing information and receiving public input on transportation decisions from low income, minority and limited English proficient (LEP) populations, as required by Title VI of the Civil Rights Act of 1964 and its implementing regulations.

Under Federal regulations, 5310 service providers must take reasonable steps to ensure that Limited English Proficient (LEP) persons have meaningful access to their programs and activities. This means that public participation opportunities, normally provided in English, should be accessible to persons who have a limited ability to speak, read, write, or understand English.

In addition to language access measures, other major components of the PPP include: public

participation design factors; a range of public participation methods to provide information, to invite participation and/or to seek input; examples to demonstrate how population-appropriate outreach methods can be and were identified and utilized; and performance measures and objectives to ensure accountability and a means for improving over time.

Mosaic Community Services, Inc. established a public participation plan or process that will determine how, when, and how often specific public participation activities should take place, and which specific measures are most appropriate.

Mosaic Community Services, Inc. will make these determinations based on a demographic analysis of the population(s) affected, the type of plan, program, and/or service under consideration, and the resources available. Efforts to involve minority and LEP populations in public participation activities may include both comprehensive measures, such as placing public notices at all transit stations, stops, and vehicles, as well as targeted measures to address linguistic, institutional, cultural, economic, historical, or other barriers that may prevent minority and LEP persons from effectively participating in our decision-making process.

Mosaic Community Services, Inc.'s mission is to transform the lives of people with mental illness and addictions. The majority of clients receiving services from Mosaic are from minority and low-income communities. **Mosaic** utilizes a broad range of public outreach information and involvement opportunities including town hall meetings for the clients we serve, allowing for open discussion, information sharing, and consideration of and response to client comments.

1. Recordkeeping on Public Outreach and Involvement Activities

To support the development of the Title VI Annual Report and update to the MTA, maintain the following records related to public outreach and involvement:

- Maintain client Town Hall minutes.

Maintenance of these records is the responsibility of **Executive Administrator**.

- **Notices are included in all Mosaic application materials**

Admissions to ensure all application packages include Title VI notices

- **Marketing materials provided to referral sources will include Public Notice**

ACCESS FOR LIMITED ENGLISH PROFICIENT (LEP) PERSONS

LANGUAGE ASSISTANCE PLAN (LAP)

Introduction and Legal Basis

LEP is a term that defines any individual not proficient in the use of the English language. The establishment and operation of an LEP program meets objectives set forth in Title VI of the Civil Rights Act and Executive Order 13116, Improving Access to Services for Persons with Limited English Proficiency (LEP). This Executive Order requires federal agencies receiving financial assistance to address the needs of non-English speaking persons. The Executive Order also establishes compliance standards to ensure that the programs and activities that are provided by a transportation provider in English are accessible to LEP communities.

Mosaic Community Services, Inc. does not meet the threshold of 5% required to have an LEP Plan. We have assessed our community and have developed an LEP Plan based on our current needs.

Assessment of Needs and Resources

The need and resources for LEP language assistance were determined through a four-factor analysis as recommended by FTA guidance.

Factor 1: Assessment of the Number and Proportion of LEP Persons Likely to be Served or Encountered in the Eligible Service Population

The agency has reviewed data from www.census.gov to determine the number of individuals in the 4 counties we serve who have limited English proficiency based on the data of language other than English that is spoken at home for household members aged 5 and above.

	Baltimore City	Baltimore County	Carroll County	Harford County
Population 5 years and over	580,907	773,315	159,218	234,856
Percentage of population who speak a language other than English at home	3.45%	5%	1.3%	1.91%

Factor 2: Assessment of Frequency with Which LEP Individuals Come Into Contact with the Transit Services or System

Mosaic Community Services, Inc. does not serve the general population within the above counties/city. Clients become eligible for transportation services when they apply for and are accepted to services at our Day programs.

The criteria to be eligible for day program services include the following:

- Must be referred by a licensed clinician
- Must have Medicaid or pay privately for services
- Must have a Priority Diagnosis (see Appendix F)

As an agency, we have had less than 10 individuals in the past 5 years that required LEP assistance. We do not have contact with the LEP population unless an individual is referred to and placed with us. We have conducted a review of the individuals we support and their families. Based on our review, we have determined that we do not have anyone who requires LEP language assistance.

If our client base should change to meet the threshold required, Mosaic Community Services, Inc. will develop an LEP plan. Any such plan would also assure the translation of vital information into languages that LEP populations can understand.

Factor 3: Assessment of the Nature and Importance of the Transit Services to the LEP Population

Transportation by Mosaic Community Services, Inc. is an important aspect of our services for the individuals we support: without the transportation program, many individuals would be unable to attend the day program, enjoy community outings, or attend medical and therapeutic appointments.

Although we do not currently serve any LEP individuals, transportation would be an important aspect of service to them if they were to begin receiving our services.

Factor 4: Assessment of the Resources Available to the Agency and Costs

Although we do not have a formal LEP Plan, Mosaic Community Services, Inc. will provide resources for interpretation for any LEP client via in-person translators or phone translators. Mosaic will also respond to any request for language services by the individuals we support and their families.

MINORITY REPRESENTATION ON PLANNING AND ADVISORY BODIES

Title 49 CFR Section 21.5(b)(1)(vii) states that a recipient may not, on the grounds of race, color, or national origin, “deny a person the opportunity to participate as a member of a planning, advisory, or similar body which is an integral part of the program.”

Mosaic Community Services, Inc. has transit-related, non-elected planning boards, advisory councils or committees, or similar committees, the membership of which we select.

Mosaic’s Client/Family Advisory Council partners interested Mosaic clients and family with members of the Mosaic team to provide guidance on ways to improve the patient experience. Through the Council process, Mosaic ensures that the perspectives and point of view of its clients are heard and integrated into services, programming and improvements with a focus on continually elevating client-centered care while meeting the agency’s mission and core values.

By working with staff across the agency, Mosaic ensures that recruitment of Council clients/family members represent the population served by Mosaic and reflect diversity in sex, race, age, etc. as well the many programs and services of the agency.

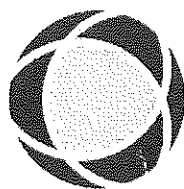
SEE APPENDIX G - TABLE MINORITY REPRESENTATION ON COMMITTEES BY RACE

Additional Policy References:

Client Complaint & Grievance Process #003

Revision History: 4/12/13, 8/27/2014, 9/25/14, 5/17

Review History: 12/15, 5/17



Mosaic

COMMUNITY SERVICES

PART OF THE SHEPPARD PRATT HEALTH SYSTEM
1925 Greenspring Drive
Timonium, MD 21093
www.mosaicinc.org

Title VI Public Notice

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that "no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance" (42 U.S.C. Section 2000d).

Mosaic Community Services, Inc. is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transportation services on the basis of race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1B. If you feel you are being denied participation in or being denied benefits of the transit services provided by Mosaic Community Services, Inc., or otherwise being discriminated against because of your race, color, national origin, gender, age, or disability, our contact information is:

*Title VI Manager/Chief Compliance Officer
Mosaic Community Services, Inc.
8003 Corporate Drive
Nottingham, MD 21236
410-453-9553
www.mosaicinc.org*

For additional information on Mosaic Community Services, Inc.'s nondiscrimination policies and procedures, please visit the website at www.mosaicinc.org. Instructions for filing Title VI complaints are posted on the agency's website and in posters on the interior of each vehicle operated in passenger service, and are also included within Mosaic's transportation welcome packet.

Locations Where Title VI Public Notices are Posted

Mosaic Community Services website: www.mosaicinc.org

Mosaic's Transportation Welcome materials

Mosaic's admission application materials

In the interior of all Mosaic 5310 vehicles



PART OF THE SHEPPARD PRATT HEALTH SYSTEM

Title VI and LEP/LAP Complaint Form

Section I:				
Name:				
Address:				
Telephone (Home):			Telephone (Work):	
Email Address:				
Accessible Format Requirements?	Large Print		Audio Tape	
	TDD		Other	
Section II:				
Are you filing this complaint on your own behalf?			Yes	No
Type of Complaint: <input type="checkbox"/> Title VI <input type="checkbox"/> Limited English Proficiency/Language Assistance Plans				
* If you answered "yes" to this question, go to Section III				
If not, please supply the name and relationship of the person for whom you are complaining:				
Please explain why you have filed for a third party:				
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.			Yes	No
Section III:				
I believe the discrimination I experienced was based on (check all that apply):				
<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin <input type="checkbox"/> Limited English Proficiency				
Date of Alleged Discrimination (Month, Day, Year): _____				
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.				

Section IV		
Have you previously filed a Title VI complaint with this agency?	Yes	No
Section V		
Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?	Yes	No
If yes, check all that apply:		
<input type="checkbox"/> Federal Agency: _____		
<input type="checkbox"/> Federal Court: _____		
<input type="checkbox"/> State Agency: _____		
<input type="checkbox"/> State Court: _____		
<input type="checkbox"/> Local Agency: _____		
Please provide information about a contact person at the agency/court where the complaint was filed.		
Name:		
Title:		
Agency:		
Address:		
Telephone:		
Section VI:		
Name of agency complaint is against:		
Contact Person:		
Title:		
Telephone number:		

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

Signature and date required below

Signature

Date

Please submit this form in person at the address below, or mail this form to:
 Mosaic Community Services
 Title VI Coordinator
 8003 Corporate Drive
 Nottingham, MD 21236

Public Participation Plan – APPENDIX D

Mosaic Community Services, Inc.'s mission is to transform the lives of people with mental illness and addictions. The majority of clients receiving services from Mosaic are from minority and low-income communities. **Mosaic** utilizes a broad range of public outreach information and involvement opportunities including town hall meetings for the clients we serve, allowing for open discussion, information sharing, and consideration of and response to client comments.

1. Recordkeeping on Public Outreach and Involvement Activities

To support the development of the Title VI Annual Report and update to the MTA, maintain the following records related to public outreach and involvement:

- Maintain client Town Hall minutes.

Maintenance of these records is the responsibility of **Executive Administrator**.

- **Notices are included in all Mosaic application materials**

Admissions to ensure all application packages include Title VI notices

- **Marketing materials provided to referral sources will include Public Notice**

APPENDIX E

LANGUAGE ACCESS PLAN

Mosaic Community Services, Inc.

Language Access Plan

I. Introduction

Mosaic Community Services, Inc. has prepared this Language Access Plan ("LAP" or "Plan"), which defines the actions to be taken by Mosaic to ensure meaningful access to agency services, programs and activities on the part of persons who have limited English proficiency. Mosaic will review and update this LAP in order to ensure continued responsiveness to community needs. This Plan meets objectives set forth in Title VI of the Civil Rights Act and Executive Order 13116, Improving Access to Services for Persons with Limited English Proficiency (LEP).

II. Purpose

The purpose of this plan is to ensure clients of Mosaic meaningful access to services, programs and activities although they may be limited in their English language proficiency.

Mosaic is committed to this Language Access Plan as the appropriate response to meeting our clients' needs.

Consistent with the guidance of objectives set forth in Title VI of the Civil Rights Act and Executive Order 13116, Improving Access to Services for Persons with Limited English Proficiency (LEP), a Limited English Proficient ("LEP") person is someone who is not able to speak, read, write or understand the English language at a level that allows him/her to interact effectively with Agency staff. A client maintains the right to self-identify as a LEP person.

III. Agency Description

Our mission: *Mosaic Community Services transforms lives through comprehensive health services for people with mental illness and addictions.*

Mosaic Community Services, the largest community-based behavioral health service provider in Maryland. Mosaic has service sites in Aberdeen, Belcamp, Catonsville, Dundalk, Randallstown, Rosedale, Towson, Baltimore City, and Westminster. Its clients, almost 600 of whom reside in Mosaic housing, live throughout the Baltimore Metropolitan area, Carroll County and Harford County. Mosaic serves individuals with severe mental health and/or addiction issues through programming which includes:

- Behavioral Health Clinics

- Psychiatric Rehabilitation Programs
- Addiction Recovery Services
- Supported employment
- Supported housing

IV. Language Access Plan:

Approach: Should it be determined that Mosaic meets or exceeds the 5% threshold based on the needs assessment, Mosaic Language Access Plan shall be fully implemented subject to the availability of fiscal resources to implement said language access plan. This Language Access Plan represents Mosaic’s administrative blueprint to provide meaningful access to Mosaic services, programs and activities on the part of LEP individuals. This Language Access Plan outlines the tasks Mosaic will undertake to meet this objective.

Language Access Plan:

(1) Agency Language Access Coordinator:

The Agency Language Access Coordinator is our Title VI Manager
 Title VI Manager/Chief Compliance Officer
 8003 Corporate Drive
 Nottingham, MD 21236
 410-453-9553
 titlevimanager@mosaicinc.org

(2) Agency Language Access Needs Assessment:

a. Based on the services, programs and activities listed above prioritize and describe the steps the agency will take to ensure such services, programs and activities provide meaningful access to the populations whose language meet or exceed the 5% threshold. *Currently, there is no population receiving services or applying for services whose language meets or exceeds the 5% threshold.*

b. Language makeup of client population

Mosaic’s Spanish population is less than .025% of our client population (currently 1 identified Mosaic client). That is well below the Maryland LEP population speaking Spanish and not close to the 5% threshold required for an LAP Plan. See MD’s chart for Spanish by City/County below.

City/County	Number of LEP Population	Percent of County Population Speaking language
Baltimore City	10,307	1.77%
Baltimore County	13,527	1.75%
Carroll County	1,070	.67%
Harford County	1,677	.71%

c. Points of contact between agency and client population

Mosaic Community Services, Inc.
Mosaicinc.org
410-453-9553

(3) Language Resources Assessment:

- a. Identification of existing staff who are linguistically, culturally, and technically able to deliver services in a language other than English and/or to serve as interpreters

None currently identified

- b. Community-based resources available to be deployed to assist agency in meeting language access needs:

Will be assessed and provided when the need arises.

(4) Language Service Protocols:

- a. Which language services are required to implement the Language Access Plan
- In person interpretation if available bilingual staff
 - Telephone Interpreter
 - Material or Brochure translation
 - Smart Phone with access capabilities to <http://translate.google.com/#>
- b. Define and describe Agency's language access protocols for providing interpretation services
- Staff working with clients will be responsible for connecting clients with interpretation resources.
- c. Define how a client will be able to access and utilize the resources identified in paragraphs (a) and (b)
- All clients receiving services through our Psychiatric Rehabilitation Programs (PRPs) have Service Coordinators that are responsible for connecting them with the appropriate resources. If the client does not receive services through our PRPs, our Get Connected Program is an organizational resource that staff can use to connect clients with the appropriate translation service/resource

(5) Vital Document Translation:

- a. Mosaic to identify, by list, the name of vital documents, in whole or in part, to translate including timeframe for translation when the need arises. Currently, we do not have a need.
- b. Mosaic website content, by list, to translate including timeframe for translation when need arises. Currently, we do not have a need.

(6) Stakeholder Consultations:

Currently, there are no stakeholders that require assistance. If the need arises, we will consult directly with the individuals to meet their specific needs.

(7) Staff Training:

If the need arises, Mosaic staff in contact with the LEP client will be provided a list of available language assistance services.

(8) Notice to Public.

Currently, we do not have a population that needs this service. If the need arises, we will provide a public notice on our web page and in our brochures.

(9) Agency Monitoring:

Monitored by Title VI manager and through the complaints procedure under our Title VI plan.

(10) Complaints:

Client or client's representative can file a complaint through Mosaic's Title VI Complaint process listed in Mosaic's Title VI Plan, page 13 and through Mosaic's complaint form located on the Mosaic Website and in Appendix B of Mosaic's Title VI Plan.

Jeff Richardson, CEO

DATE

Language Access Complaint Procedure

You may file a complaint with the Agency Title VI Manager if you believe you have been denied the benefits of this Plan. You must file your written complaint within 180 of the alleged denial. Submit the written complaint to:

Name of Title VI Manager:	Nicholas Dunphy
Agency Name:	Mosaic Community Services, Inc.
Business Address:	8003 Corporate Drive
City, State Zip:	Nottingham, MD 21236
Email Address:	Nicholas.dunphy@mosaicinc.org

Procedures for Complaints are listed in Title VI Plan and on the Mosaic Website.

Attachment #1 Priority Population Diagnoses – Adults

Please use the Priority Population Diagnoses listed below as the *primary diagnosis (es)* for the applicant.

DSM-5 Diagnosis	ICD-9 CODE	ICD-10 CODE
Schizophrenia	295.90	F20.9
Schizophreniform Disorder	295.40	F20.81
Schizoaffective Disorder, Bipolar Type	295.70	F25.0
Schizoaffective Disorder, Depressive Type	295.70	F25.1
Other Specified Schizophrenia Spectrum and Other Psychotic Disorder	298.8	F28
Unspecified Schizophrenia Spectrum and Other Psychotic Disorder	298.9	F29
Delusional Disorder	297.1	F22
Major Depressive Disorder, Recurrent Episode, Severe without Psychotic Features	296.33	F33.2
Major Depressive Disorder, Recurrent Episode, Severe with Psychotic Features	296.34	F33.3
Bipolar I Disorder, Current or Most Recent Episode, Manic, Severe without Psychotic Features	296.43	F31.13
Bipolar I Disorder, Current or Most Recent Episode, Manic, Severe with Psychotic Features	296.44	F31.2
Bipolar I Disorder, Current or Most Recent Episode, Depressed, Severe without Psychotic Features	296.53	F31.4
Bipolar I Disorder, Current or Most Recent Episode, Depressed, Severe with Psychotic Features	296.54	F31.5
Bipolar I Disorder, Current or Most Recent Episode, Hypomanic	296.40	F31.0
Bipolar I Disorder, Current or Most Recent Episode, Hypomanic, Unspecified	296.40	F31.9
Bipolar I Disorder, Current or Most Recent Episode, Unspecified	296.7	F31.9
Bipolar II Disorder	296.89	F31.81
Schizotypal Personality Disorder	301.22	F21
Borderline Personality Disorder	301.83	F60.3
The diagnostic criteria may be waived for either one of the following two conditions:		
1. An individual committed as not criminally responsible who is conditionally released from a Mental Hygiene facility, according to the provisions of Health General Article, Title 12, Annotated Code of Maryland	Please check if applicable: <input type="checkbox"/>	
2. An individual in a Mental Hygiene facility with a length of stay of more than 6 months who requires RRP services. <i>This excludes individuals eligible for Developmental Disabilities services.</i>	Please check if applicable: <input type="checkbox"/>	

Substance Use Disorders

Please use the Substance Use Disorders if the applicant has a co-occurring disorder. This should not be the primary diagnosis. *The primary diagnosis must be one or more of the Priority Population diagnoses listed above.*

Substance Use Disorders	ICD-9 CODE	ICD-10 CODE
Alcohol Use Disorder – Mild	305.00	F10.10
Alcohol Use Disorder – Moderate	303.90	F10.20
Alcohol Use Disorder – Severe	303.90	F10.20
Cannabis Use Disorder – Mild	305.20	F12.10
Cannabis Use Disorder – Moderate	304.30	F12.20
Cannabis Use Disorder – Severe	304.60	F12.20
Opioid Use Disorder – Mild	305.50	F11.10
Opioid Use Disorder – Moderate	304.00	F11.20
Opioid Use Disorder – Severe	304.00	F11.20
Stimulant-Related Disorder – Cocaine – Mild	305.60	F14.10
Stimulant-Related Disorder – Cocaine – Moderate	304.20	F14.20
Stimulant-Related Disorder – Cocaine – Severe	304.20	F14.20
Stimulant-Related Disorder – Amphetamine-type substance – Mild	305.70	F15.10
Stimulant-Related Disorder – Amphetamine-type substance – Moderate	304.40	F15.20
Stimulant-Related Disorder – Amphetamine-type substance – Severe	304.40	F15.20
Tobacco Use Disorder – Mild	305.1	Z72.0
Tobacco Use Disorder – Moderate	305.1	F17.200
Tobacco Use Disorder – Severe	305.1	F17.200
Other (or Unknown) Substance Use Disorder – Mild	305.90	F19.10
Other (or Unknown) Substance Use Disorder – Moderate	304.90	F19.20
Other (or Unknown) Substance Use Disorder – Severe	304.90	F10.20

MINORITY REPRESENTATION ON COMMITTEES BY RACE
APPENDIX G

Committee	Black or African American	White/Caucasian	Latino/Hispanic	American Indian or Alaska Native	Asian	Native Hawaiian or other Pacific Islander	Other <i>*Note</i>	Totals
Client/Family Advisory Council (CFAC)	8	8	2		2			
% of CFAC Committee	40	40	10		10			

RESOLUTION OF THE BOARD OF DIRECTORS
MOSAIC COMMUNITY SERVICES, INC.

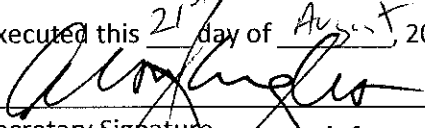
WHEREAS, it is Mosaic Community Services, Inc.'s philosophy and policy to engage referrals for service and recipients of services without regard to race, color, sex, sexual orientation, religion, national origin, age, veteran status, disability, or other category protected by law;

WHEREAS, Mosaic Community Services, Inc. is the recipient of grant funds from the Maryland Transit Administration which originate with the Federal Transit Administration;

WHEREAS, to ensure compliance with State and Federal laws and regulations, in particular the Maryland Transit Administration's requirements of its grantees which receive funds originating from the Federal Transit Administration to ensure the dollars are used in a nondiscriminatory manner as required by Title VI of the Civil Rights Act of 1964 and its progeny, Mosaic Community Services, Inc. will implement the attached Non Discrimination Policy -Title VI Plan.

NOW THEREFORE BE IT RESOLVED AS FOLLOWS:

The Board approves the attached Non Discrimination Policy -Title VI Plan, effective August 21, 2017. Upon approval of the Board, the plan shall be executed by the Executive Director and implemented effective August 21, 2017. IN WITNESS HEREOF, the undersigned hereby certifies that he/she is the duly elected Secretary of Mosaic Community Services, Inc. and that this Resolution was adopted by a unanimous vote of the Board of Directors, taken on 8/21, 2017, and that this Resolution is now in full force and effect without modification or rescission.

Executed this 21st day of August, 2017.

Secretary Signature ALTON F. KNIGHT Date 8/21/2017
Print Name