**Title VI Plan**

First Step House is working with the Federal and Utah Transit Authorities to meet our recipient’s transportation needs. Pursuant to Title VI of the Civil Rights Act of 1964 and related laws and regulations, First Step House is working to ensure that our transportation services that are within the guidelines of Title VI.

First Step House provides clients with transportation services to locations within Salt Lake County 7 days per week, 24 hours per day as needed to meet individual employment, housing, health, and recovery needs. Main locations served include, but are not limited to, the following:

1. Medical facilities
2. Government and human service agencies
3. Substance abuse recovery events

**Notice to the Public**

First Step House has provided a public notice of an individual’s rights under Title VI through posting them at our residential facilities along with posting in each vehicle. The notice to the public will be also located on our website**.**

**Title VI Investigations, Complaints, and Lawsuits**

First Step House has not had any Title VI investigations, complaints, or lawsuits. Any Title VI investigations, complaints, or lawsuits will be documented in our Title VI policy and procedure and will be updated as needed. Documentation will include the following:

1. Type
2. Date
3. Summary
4. Status
5. Action(s) taken

**Public Participation**

The First Step House Board of Directors hosts a quarterly meeting located at 426 South 500 East Salt Lake City, UT 84102, and it is open to the public. Our current meeting space is not accessible; however, meeting can be held in an alternative room in the same building or in the conference room in the adjacent building to accommodate persons with disabilities. Meeting dates and times are not published; however, the dates and times are available to all who inquire and would like to attend. Transportation services are provided during meeting times and we can provide transportation to our Board of Directors meeting upon request.

First Step house receives funds from both the city and the county. Interested parties can comment or provide feedback about funding at the public hearings held by each agency before funding awards are made final. Our case management staff and peer support specialists educate and coordinate with clients and community providers about all internal and external transportation services and we have a client comment box at each site for clients to provide input.

**Language Access Plan**

**Introduction**

This plan outlines the initiatives of **First Step House** to take reasonable steps to ensure meaningful access to its programs and activities by persons with limited English proficiency in compliance with the Department of Housing and Urban Development’s, “Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons; Notice” in the Federal Register on January 22, 2007.

**First Step House** is committed to providing meaningful access to its programs and activities to all eligible individuals regardless of race, color, or national origin, including those for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English – limited English proficiency, or LEP.

**First Step House** is further committed to providing equal access to housing to all residents without regard to race, color, religion, sex, disability, sexual orientation, familial status, national origin, or source of income.

Four Factor Analysis

1. The number or proportion of LEP persons in Salt Lake City eligible to be served or likely to be encountered by **First Step House** programs and activities.

| **Subject** | **Salt Lake City, Utah** | | | | | |
| --- | --- | --- | --- | --- | --- | --- |
| **Total** | | **Percent of specified language speakers** | | | |
|  | | **Speak English**  **"very well"** | | **Speak English**  **less than "very well"** | |
| **Estimate** |  | **Estimate** |  | **Estimate** |  |
| **Population 5 years and over** | 175,268 |  | 89.1% |  | 10.9% |  |
| **Speak only English** | 73.6% |  | (X) |  | (X) |  |
| **Speak a language other than English** | 26.4% |  | 58.8% |  | 41.2% |  |
| **Spanish or Spanish Creole** | 16.0% |  | 56.4% |  | 43.6% |  |
| **Other Indo-European languages** | 3.9% |  | 67.7% |  | 32.3% |  |
| **Asian and Pacific Island languages** | 4.8% |  | 58.4% |  | 41.6% |  |
| **Other languages** | 1.6% |  | 62.1% |  | 37.9% |  |
|  |  |  |  |  |  |  |
| **SPEAK A LANGUAGE OTHER THAN ENGLISH** |  |  |  |  |  |  |
| **Spanish or Spanish Creole** | 28,123 |  | 56.4% |  | 43.6% |  |
| **5-17 years** | 7,728 |  | 86.9% |  | 13.1% |  |
| **18-64 years** | 19,362 |  | 44.4% |  | 55.6% |  |
| **65 years and over** | 1,033 |  | 52.4% |  | 47.6% |  |
| **Other Indo-European languages** | 6,875 |  | 67.7% |  | 32.3% |  |
| **5-17 years** | 803 |  | 77.3% |  | 22.7% |  |
| **18-64 years** | 4,826 |  | 70.6% |  | 29.4% |  |
| **65 years and over** | 1,246 |  | 50.3% |  | 49.7% |  |
| **Asian and Pacific Island languages** | 8,463 |  | 58.4% |  | 41.6% |  |
| **5-17 years** | 1,245 |  | 73.2% |  | 26.8% |  |
| **18-64 years** | 6,348 |  | 56.6% |  | 43.4% |  |
| **65 years and over** | 870 |  | 50.2% |  | 49.8% |  |
| **Other languages** | 2,804 |  | 62.1% |  | 37.9% |  |
| **5-17 years** | 615 |  | 68.5% |  | 31.5% |  |
| **18-64 years** | 2,004 |  | 63.4% |  | 36.6% |  |
| **65 years and over** | 185 |  | 26.5% |  | 73.5% |  |
|  |  |  |  |  |  |  |
| **CITIZENS 18 YEARS AND OVER** |  |  |  |  |  |  |
| **All citizens 18 years and over** | 126,396 |  | 96.2% |  | 3.8% |  |
| **Speak only English** | 86.4% |  | (X) |  | (X) |  |
| **Speak a language other than English** | 13.6% |  | 72.0% |  | 28.0% |  |
| **Spanish or Spanish Creole** | 6.7% |  | 73.8% |  | 26.2% |  |
| **Other languages** | 7.0% |  | 70.4% |  | 29.6% |  |
|  |  |  |  |  |  |  |
| **PERCENT IMPUTED** |  |  |  |  |  |  |
| **Language status** | 3.3% |  | (X) |  | (X) |  |
| **Language status (speak a language other than English)** | 2.3% |  | (X) |  | (X) |  |
| **Ability to speak English** | 2.8% |  | (X) |  | (X) |  |

1. The frequency with which LEP persons in Salt Lake City come in contact with **First Step House** programs and activities.
   1. **[99]**% of the persons participating in **First Step House** programs speak English, **[<1]**% speak Spanish with LEP, and **[<1]**% speak other languages with LEP.
2. The nature and importance of **First Step House** programs and activities to people in Salt Lake City.

*We operate two residential substance abuse treatment facilities, two outpatient treatment centers, and six transitional housing facilities in Salt Lake County, Utah. We are currently in the process of building two permanent supportive housing facilities for homeless individuals with serious mental illness and substance use disorders. The scope of services we offer include substance use disorder and mental health assessment, residential and outpatient treatment, recovery residence services, housing, case management, employment support, primary health care, peer support services, and long-term recovery management. FSH has been a consistent leader in the Salt Lake metro area achieving positive outcomes for over 1,000 individuals, Veterans, and families per year who struggle with high severity substance use disorders, histories of homelessness, mental health conditions, justice system involvement, and primary health concerns.*

1. The resources available to **First Step House** and costs.

Interpreting Services to persons in need because of their limited English proficiency

1. Translation services
2. Translation Services for vital documents
3. On-phone interpreting

As consideration for the provision of the Services by the Service Provider, the prices for the provision of Services are:

* Interpreting Services: $35.00/h, with one-hour minimum
* Translation Services: $0.25 per word
* Translation Services for Vital Documents: $35 flat rate (Birth, Death and Marriage Certificates)
* On-phone interpreting: $1.25/minute (rounded off to the nearest minute)
* After Hours (holidays, weekends and after 5pm): $40.00/hr

If client has Medicaid, the Service Provider will bill Medicaid directly.

LEP individuals who need language assistance

* Census data lists Spanish speakers as the largest group of LEP persons in Salt Lake City, and **First Step House** reports its most frequent contacts with LEP persons are with those who speak **Spanish, Arabic.**

Language Assistance Measures

* **First Step House** provides the following services to LEP persons:

*In-person interpretation, phone interpretation, community-based resources, etc., are available to provide language access at no cost to the patient. Individuals seeking treatment information will be given phone or in-person interpretation through a linguistically competent staff member or interpreter able to respond to their unique language needs. Those engaged in treatment will be assigned a clinician competent in the language spoken, when possible. When this is not possible, community-based resources (listed above) will be utilized to ensure access to programs, facilities, and services. First Step House also provides vital document translation—client enrollment forms, agreements, policies, and procedures will be translated within 24 hours foreach client.*

Staff Training

* **First Step House** staff members are trained to accommodate LEP persons who inquire about, apply for, or participate in its programs and activities to ensure that language is not a barrier to their access and participation.

Providing Notices to LEP Persons

* **First Step House** provides the following notices and outreach materials to LEP persons
  + Medicaid Optum client rights (Spanish)
  + Medicaid Optum Member handook and provider directery
  + All materials are to be subject to translation upon entry of client.

*Program marketing and recruitment efforts will include a notice of the availability of language access for those with an alternative primary language.*

Monitoring and Updating the LAP

* **First Step House** staff members review the LAP semi-annually to monitor its effectiveness and update it as needed to address the changing circumstances related to LEP persons maintaining meaningful access to its programs and activities.

Fair Housing

* **First Step House** is committed to affirmatively furthering fair housing and providing equal access to housing opportunities to all residents without regard to race, color, religion, sex, disability, sexual orientation, familial status, national origin, or source of income including those for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English.

Copied below is the First Step House Language Access Plan as outlined in our General Operating Policies and Procedures, for your reference.

**Language Access Plan**

First Step House 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 First Step House administrative blueprint to provide meaningful access to First Step House services, programs and activities on the part of LEP individuals. This Language Access Plan outlines the tasks First Step House will undertake to meet this objective.

1. First Step House Language Access Coordinator (LAC), Megan Rabuck, Quality Assurance Specialist: 230 S 400 S, Salt Lake City, UT 84102 801-359-8862, ext. 2181; [mrabuck@firststephouse.org](mailto:mwarthen@firststephouse.org)
2. First Step House Language Access Needs Assessment

* 1. First Step House will conduct a needs assessment of all programs to determine what is needed to ensure meaningful access: translation, written and online information, PR/advertising, outreach
  2. First Step House will identify existing staff who are linguistically, culturally, and technically able to deliver services in a language other than English and/or to serve as interpreters.
  3. Community-based resources are available to be deployed to assist the agency in meeting language access needs

The process in place for accessing interpreting and translating services is by contacting the Asian Association of Utah via their email address at [interpreting@aau-slc.org](mailto:interpreting@aau-slc.org). The email should contain the following information:

* Client Initials (not their full name)
* The language the client speaks
* If they have Medicaid or not
* Client Medicaid Number
* Date the Client switched to Medicaid
* Client Date of Birth
* Therapist name

All emails will be sent as encrypted to protect the client’s personal information. The Interpreting and Translation Program Coordinator will set up the necessary interpreting services and the Asian Association will bill Medicaid directly. If the client does not have Medicaid, then FSH will pay the Asian Association’s flat rate for service directly.

OPTUM Medicaid does not pay for cancellations of services within 24 hours of the appointment or client no shows to the appointment so the financial responsibility falls on First Step House to pay for the interpreter. It is imperative that both the clinician and the client understand the importance of attending the appointment and giving advanced notice if the appointment needs to be rescheduled in order to ensure the interpreting services are available for others.

**Community Organizations**

1. New Americans  
    2001 South State Street N1-130, Salt Lake City, UT 84114

Phone: 385-468-4861

1. Refugee & Immigrant Center - Asian Association of Utah

155 300 W, Salt Lake City, UT 84101

Phone: 801-467-6060

1. Consulado De Mexico

660 S 200 E Ste. 300, Salt Lake City, Utah 84111-3835

Phone: 801-521-8502

**Private Translation Corporations**

1. Advantage Learning Centers

2854 S Redwood Rd Ste C20, Salt Lake City, UT 84119

Phone: 801-708-7210

1. Alpine Interpreting

10 W Broadway Ste 712, Salt Lake City, UT, 84101

Phone: 801-983-9125

1. Bilingual Business Translations (Trnsltns)

3641 E Golden Oaks Dr, Salt Lake City, UT, 84121

Phone: 801-938-9379

**Language Service Protocols**

1. In-person interpretation, phone interpretation, community-based resources, etc., are available to provide language access at no cost to the patient.
2. Individuals seeking treatment information will be given phone or in-person interpretation through a linguistically competent staff member or interpreter able to respond to their unique language needs.
3. Those engaged in treatment will be assigned a clinician competent in the language spoken, when possible. When this is not possible, community-based resources (listed above) will be utilized to ensure access to programs, facilities, and services.

**Vital Document Translation**

Client enrollment forms, agreements, policies, and procedures will be translated within 24 hours for each client.

**Staff Training**

All staff will receive a copy of the LAP as part of new hire orientation and will receive cultural competency training as part of their required online coursework.

**Notice to Public**

Program marketing and recruitment efforts will include a notice of the availability of language access for those with an alternative primary language.

**Agency Monitoring**

This plan will be monitored and edited on a biannual basis during strategic planning sessions. Consideration will be given to the frequency at which LEP individual seek out services and our ability to meet the needs of LEP individuals in our community. Staff will report to members of the executive team on frequency of LEP services requested and utilized.

**Complaints**

All complaints will be submitted to the Language Access Coordinator for review and response. The LAC will follow federal guidelines to respond appropriately.

**Public Notice of Rights Under Title VI**

First Step House ensures that no person will be denied services due to race, religion, sex, age, national origin, sexual identity/orientation, or disability. Pursuant to Title VI of the Civil Rights Act of 1964 and related laws and regulations, First Step House is obligated to uphold these standards. If you believe that there has been a violation of your rights under Title VI, a complaint may be filed. Complaint forms can be found at our 440 S, 411 N, 660 S, and 2200 S locations in the suggestion box or complaints can be made directly to the Human Resources Director. If this violation is related to transportation, you can also choose to file a complaint directly with the Federal Transit Administration through mail. The Federal Transit Administration complaint form can be found at: <https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/Consolidated_Civil_Rights_Complaint_Form.pdf>

If you believe that there has been an instance that violates Title VI, please promptly report to the following:

Jazz Hamilton, PHR

Human Resources Director

426 500 E

Salt Lake City, UT 84102

Phone: 801-359-8862 x2124

Fax: 801-359-8510

Email: [jhamilton@firststephouse.org](mailto:jhamilton@firststephouse.org)

Andrew Gray  
UTA Title VI Compliance Officer  
(801) 287-3533  
[AGray@rideuta.com](mailto:AGray@rideuta.com)

Cherissa Alldredge   
UTA ADA Compliance Officer  
(801)287-3536  
[CAlldrege@rideuta.com](mailto:CAlldrege@rideuta.com)

**UTA and Title VI**  
Title VI of the Civil Rights Act of 1964 states:

“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.”

UTA is committed to complying with Title VI of the Civil Rights Act requirements and protecting those accessing transit services from discrimination on the basis of race, color or national origin. UTA examines service changes, monitors its system and investigates any allegations of discrimination.  
  
**Making a Civil Rights Complaint**  
If you believe you have experienced discrimination on the basis of a protected class including your race, color or national origin, please let us know. You may issue a complaint through:

* Contact UTA Customer Service at 801-743-3882
* Submit electronic comment forms at rideuta.com or you can [click here](https://www.rideuta.com/Rider-Info/Customer-Service/Contact-Customer-Service/Write-a-Comment/Civil-Rights-Complaint-Form)

**UTA's Title VI Program**  
UTA is required to submit a Title VI Program to the Federal Transit Administration (FTA) every three years. This program outlines the efforts UTA has taken to ensure compliance with our federal obligations. [Click here](https://www.rideuta.com/-/media/Files/About-UTA/Title-Six/UTA_Title_VI_Program_2019.ashx?la=en) to view UTA’s Title VI Program.

**Short Title VI Notice**

First Step House ensures that no person will be denied services due to race, religion, sex, age, national origin, sexual identity/orientation, or disability. To find out more about our nondiscrimination obligations, how to file a complaint, or to request this information in another language, please contact us at 801-359-8862 x2124.

**Grievance Policy**

Client, staff, and stakeholders have the right to initiate a formal grievance. Anyone who believes that they have been mistreated by FSH as an organization, by staff, by contractors, or by any other affiliated entity or has concerns about fraud, waste, and abuse has a right to file a grievance. A filed grievance initiates an investigation and review process.

**Procedure for Filing a Grievance Internally**

Grievances can be filed in the following manner:

1. Report your grievance to your individual therapist, case manager, supervisor, or an individual in the Quality Improvement Department and include a detailed written description of your grievance.
2. If you do not feel comfortable addressing the concern with your individual therapist, case manager, supervisor, or an individual in Quality Improvement, or you are unable to contact your individual representative, you can file it with the supervisor, program manager, or director that you feel most comfortable with reporting to. All grievances will be forwarded to the Quality Improvement Department so a formal investigation can be initiated.
3. You will receive updates as to the state of your grievance by a client representative from the Quality Improvement Department.
4. Upon resolution of the grievance review process, a representative from the Quality Improvement Department will contact you to consult as to the state of your concerns and follow up on any further action needed.
5. Please note that First Step House staff cannot discuss matters of the grievance review process that would infringe upon the confidentiality rights of others involved.
6. If you disagree with a grievance determination, you can communicate your disapproval of the grievance decision and request a review by the Board of Directors.
7. If a board hearing is approved, a review date and time will be set.

**Filing a Grievance Anonymously**

1. Suggestion boxes are placed in each location with FSH Suggestion, Complaint, and Grievance Forms.
2. Please use the Grievance form to help expedite the process and follow up from our Quality Improvement team
3. Write your grievance, be as detailed as possible, and place it in one of the secured suggestion boxes. The suggestion box locations are as follows;
   1. REACH (950 E 3300 S); On wall in the lobby area
   2. Fairpark Residential (411 N Grant St); Within the community/TV room, between the two, first level therapist’s office on the south side.
   3. Central City Residential (440 S 500 E); Within the basement level, on the wall opposite to the elevator and on the main residential floor hallway next to RSS office door and bulletin board
   4. Valor House (720 Valdez Dr); Within the front desk area, on the south side.
   5. Charter (439 S Denver St); outside the HSS office in mail room
   6. Medina Place (426 S 500 E); outside Supportive Housing Coordinator’s office on second floor
   7. Outpatient (434 S 400 E); near front desk
4. You may also contact any of the previously mentioned representatives via phone, letter, or email. Leave a detailed description of the complaint and do not include your personal information.

**Internal Grievance Review Process**

When an internal grievance is filed, the review process will be initiated by the Quality Improvement Department.

1. If a FSH staff member receives a formal grievance, they should inform the individual that the grievance review process will be initiated through the Quality Improvement Department and that someone should be contacting them to discuss their grievance.
2. The FSH staff member receiving the grievance will then forward this to the Quality Improvement Department.
3. The Quality Improvement Department will contact the complainant to let them know that the grievance has been received and determine whether they have any confidentiality preferences related to the grievance.
4. Quality Improvement Department will send the grievance out to management that oversees individuals involved in the grievance.
5. The Quality Improvement Department will investigate the claims made in the grievance and determine whether or not the claim can be substantiated.
6. Upon the completion of investigation, the complainant will be contacted by the Quality Improvement Department to receive information about if the requests can be accommodated.
7. All information related to the investigation and resolution of the grievance will be documented and reviewed quarterly by the Executive Team.
8. All incidences that require reporting to an external agency will be reported by the Quality Improvement Department.
9. All required or suggested improvements will be included in the grievance report and sent out to involved parties.
10. The Quality Improvement Department will follow up to ensure that all required improvements are made.

**Filing a Complaint Outside of First Step House**

Other governing entities will have their information posted for their own internal processes within the public posting locations at each facility. Employees will take no disciplinary or punitive action because a client, employee, or other person who provides care, treatment, or services reports safety, quality-of-care concerns or fraud, waste or abuse concerns to FHS staff or any other entity.

**Joint Commission:**

Clients and employees can submit a complaint to The Joint Commission by e-mail at [complaint@jointcommission.org](mailto:complaint@jointcommission.org) Your e-mail should include the name and address of the treatment facility, and a thorough explanation of your complaint. The public can also submit a complaint to The Joint Commission via The Joint Commission’s website: <https://www.jointcommission.org/report_a_complaint.aspx>

**Federal Transit Administration:**

Clients may also submit a Title VI compliant related to transportation directly to the Federal Transit Administration (FTA) via phone at 888-446-4511 or by mail. The FTA complaint form is located at: <https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/Consolidated_Civil_Rights_Complaint_Form.pdf>

**Americans with Disabilities Act:**

You can file an Americans with Disabilities Act (ADA) complaint alleging disability discrimination against a State or local government or a public accommodation (private business including, for example, a restaurant, doctor's office, retail store, hotel, etc.). A complaint can be filed online using the link below, by mail, or by facsimile. Instructions for submitting attachments are on the form. To file an ADA complaint by facsimile, fax the completed ADA complaint form to: (202) 307-1197. To file an ADA complaint online: [Americans with Disabilities Act Discrimination Online Complaint Form](https://www.ada.gov/complaint/)

**Office of Civil Rights:**

If you feel that your Civil Rights have been violated, you may file a complaint by contacting the Office of Civil Rights at: <https://www.hhs.gov/ocr/complaints/index.html>

**Optum:**

If you feel that you have been treated unfairly or discriminated against for any reason, you may file a complaint by contacting Optum Salt Lake County at: 1-877-370-8953.

**Department of Human Services:**

If you witness Provider Code of Conduction Violations, call the Department of Human Services at: 801-520-2777.

**U.S. Department of Housing and Urban Development**

If you have been discriminated against with regard to Equal Housing Opportunity, you may file a complaint by phone at: 1-800-669-9777 or 1-800-927-9275(TTY).

**U.S. Department of Veterans Affairs**

To submit concerns about fraud, waste, or abuse, complete and submit the [*Program Integrity Fraud, Waste and Abuse Complaint Form*, VA Form 10-0500](https://www.va.gov/COMMUNITYCARE/pubs/FormDetails_10-0500.asp) via email to [OCCProgramIntegrityTeam@va.gov](mailto:OCCProgramIntegrityTeam@va.gov). You can also download, print and return the form by mail or fax to the address and fax number included on the form. We will make every effort to keep all information we receive confidential.

**Medicaid**

If you think a Medicaid provider is involved with fraud, please contact: The Utah Office of Inspector General (OIG), Email: [mpi@utah.gov](mailto:mpi@utah.gov), Toll-Free Hotline: 1-855-403-7283