

**DOLORES COUNTY SENIOR SERVICES**

# **Title VI Plan**

**Adopted 1/20/2026**

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## **BACKGROUND**

Dolores County Senior Services is located in Dove Creek, Colorado and serves the counties of Dolores County, the west end of San Miguel County, and the west end of Montezuma County. A total of 13 employees are employed at this multi-purpose organization that served approximately 250 clients in 2025. DCSS provides demand response transit service to seniors and the general public in Dolores County and surrounding areas. DCSS responds not only to the needs of the elderly and disabled, but to the general public including low income and other transit dependent persons in the community. Service is provided five days a week, Monday through Friday, 8:00 am to 5:30 pm and for scheduled events.

## **NOTICE TO THE PUBLIC**

Dolores County Senior Services operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with Title VI Coordinator at Dolores County Senior Services. For more information on Dolores County Senior Services civil rights program and procedures to file a complaint contact 970-677-2787; email [alisa.schultz@dolorescountyCO.gov](mailto:alisa.schultz@dolorescountyCO.gov); or visit the Title VI Coordinator's office at 8540 RD 7.2, Dove Creek, Colorado 81324. A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5<sup>th</sup> Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590. If you need this information in another language, please contact the Title VI Coordinator at 970-677-2787 or [alisa.schultz@dolorescountyCO.gov](mailto:alisa.schultz@dolorescountyCO.gov).

Dolores County Senior Services Title VI Complaint Procedure will be translated into other languages, as needed, including contact information for the translation service.

A copy of this notice can be found on Dolores County's website [dolocnty.colorado.gov](http://dolocnty.colorado.gov), posted in the foyer of our facility and in all vehicles used in transporting public transportation clients.

## **COMPLAINT PROCEDURES AND FORM**

A formal complaint must be filed within one-hundred eighty (180) calendar days of the alleged occurrence. Complaints shall be in writing and signed by the individual or his/her representative, and will include the Complainant's name, address and telephone number; name of the alleged discriminating person(s), basis of complaint (race, color, national origin), and the date of the alleged act or acts. A statement detailing the facts and circumstances of the alleged discrimination must accompany all complaints. Please submit Title VI Complaints in writing to Dolores County Senior Services at the address listed below.

Title VI Coordinator  
Dolores County Senior Services  
PO Box 678  
Dove Creek, CO 81324  
970-677-2787

In the case where a Complainant is unable or incapable of providing a written statement, a verbal complaint of discrimination may be made to Dolores County Senior Services' Title VI Coordinator. Under these circumstances, the Complainant will be interviewed, and the Title VI Coordinator will assist the Complainant in converting the verbal allegations to writing. If you need this information in another language, please contact the Title VI Coordinator at 970-677-2787 or [alisa.schultz@dolorescountyCO.gov](mailto:alisa.schultz@dolorescountyCO.gov).

When a complaint is received, the Title VI Coordinator will provide written acknowledgment to the Complainant within ten (10) calendar days by registered mail.

If a complaint is deemed incomplete, additional information will be requested, and the Complainant will be provided sixty (60) calendar days to submit the required information. Failure to do so may be considered good cause for a determination of no investigative merit.

Within fifteen (15) calendar days from receipt of a complete complaint, Dolores County Senior Services will determine its jurisdiction in pursuing the matter and whether the complaint has sufficient merit to warrant investigation. Within five (5) calendar days of this decision, the Director or his/her authorized designee will notify the Complainant and Respondent, by registered mail, informing them of the disposition.

- a. If the decision is not to investigate the complaint, the notification shall specifically state the reason for the decision.
- b. If the complaint is to be investigated, the notification shall state the grounds of Dolores County Senior Service's jurisdiction, while informing the parties that their full cooperation will be required in gathering additional information and assisting in the investigation.

When Dolores County Senior Services does not have sufficient jurisdiction, the Title VI Coordinator or his/her authorized designee will refer the complaint to the appropriate State or Federal agency holding such jurisdiction.

If the complaint has investigative merit, the Title VI Coordinator or his/her authorized designee will assign an investigator. A complete investigation will be conducted, and an investigative report will be submitted to the Title VI Director within sixty (60) calendar days from receipt of the complaint. The report will include a narrative description of the incident, summaries of all persons interviewed, and a finding with recommendations and conciliatory measures where appropriate. If the investigation is delayed for any reason, the investigator will notify the appropriate authorities, and an extension will be requested.

The Title VI Coordinator or his/her authorized designee will issue letters of finding to the Complainant and Respondent within ninety (90) calendar days from receipt of the complaint.

If the Complainant is dissatisfied with Dolores County Senior Services resolution of the complaint, he/she has the right to file a complaint with the Federal Transit Administration, at FTA Office of Civil Rights, 1200 New Jersey Ave SE, Washington, DC 20590.

The numbers and percentages of LEP persons in our service area are very low. At this time, no additional services are necessary. The County is committed to continue to monitor LEP needs over time and budget accordingly to address those needs if and when they arise. Dolores County Senior Services Title VI Complaint Procedure will be translated into other languages, as needed, including contact information for the translation service.

## **TITLE VI COMPLAINTS, INVESTIGATIONS AND LAWSUITS**

Dolores County Senior Services has had no complaints, investigations, or lawsuits.

## **PUBLIC PARTICIPATION PLAN**

To have a proactive public involvement process, the DCSS will provide a public comment period of 30 days on the proposed public participation procedure to be used in transportation planning process. The procedures will inform the public about how, when, and where they may participate.

DCSS will schedule meetings at times and locations that are convenient and accessible for minority and LEP communities.

DCSS will employ different meeting sizes and formats.

DCSS will coordinate with community-and faith-based organizations, educational institutions, and other organizations to implement public engagement strategies that reach out specifically to members of affected minorities and/or LEP communities.

DCSS will provide opportunities for public participation through means other than written communication, such as personal interviews or the use of audio or video recording devices to capture oral comments.

Information regarding meetings and events will be placed on the Dolores County web site: [www.dolocnty.colorado.gov](http://www.dolocnty.colorado.gov), in The Pinto Bean, the monthly community publication and by the use of advisory committees for community involvement and formal presentations to various service clubs, civic and professional groups. Information will be included in the monthly newsletter that is sent out to DCSS clients.

DCSS will provide the public with reasonable and timely access to technical and policy information relating to the data or content used in the development of transportation plans, programs, and projects. Standard documents will be available on the Dolores County website: [www.dolocnty.colorado.gov](http://www.dolocnty.colorado.gov) and at the DCSS office at 8540 RD 7.2, Dove Creek, CO during normal working hours.

DCSS will take a proactive approach to providing the opportunity for the public to be involved early and with continuing involvement in all phases of the planning process. Extensive public notice will be undertaken of public information meetings and hearings.

Responses to questions and comments from the public concerning the public participation process, draft transportation plans, programs, or public agency consultation process will be made directly to the individual by letter or telephone call or by way of a periodic newsletter. A summary analysis and report on disposition of comments will be made a part of the final plan. Rationale for policy decisions will be available to the public in writing if requested.

## Language Assistance Plan Supplement

Dolores County Senior Services has developed the following Language Assistance Plan to ensure meaningful access to program services for Limited English Proficient (LEP) individuals. An LEP individual is one who does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English.

This plan details procedures on how to identify a person who may need language assistance, the ways in which assistance may be provided, training to staff, notification to LEP persons that assistance is available, and information for future plan updates. In developing the plan, Dolores County Senior Services completed the following Four Factor Analysis:

### Factor One:

- 1) **The number or proportion of LEP persons eligible to be served or likely to be encountered by Dolores County Senior Services.** According to the 2020 American Community Survey information detailing “Language Spoken at Home” (Table C16001) for Dolores County residents, there are zero LEP language groups that exceed the Safe Harbor Provision of 1,000 persons or five percent of the service area population, whichever is less. Specifically:

	<b>Dolores County, Colorado</b>	
<b>Label</b>	<b>Estimate</b>	
Total:	2,260	
Speak only English	1,971	87.21%
Spanish:	222	9.82%
Speak English "very well"	63	2.79%

Speak Spanish and speak English less than very well	159	7.04%
German or other West Germanic languages:	26	1.15%
Speak English "very well"	26	1.15%
Other and unspecified languages:	41	1.81%
Speak English "very well"	41	1.81%
Speak English less than "very well"	0	

While Dolores County Senior Services does not currently maintain non-English versions of documents, reasonable effort will be made to provide vital information to LEP individuals in the language requested.

**Factor Two:**

- 2) **The frequency with which LEP individuals come in contact with Dolores County Senior Services.** Based on our service records and outreach efforts, including customer service interactions and ridership surveys, Dolores County Senior Services estimates that approximately zero LEP individuals interact with our services on a daily basis.

Although our current data indicates that LEP contacts occur less frequently, Dolores County Senior Services remains committed to proactive language assistance measures. We recognize that even infrequent interactions can present critical communication barriers. Therefore, we continue to implement targeted initiatives—such as multilingual resources and interpreter services—to ensure that all individuals, regardless of language proficiency, have equitable access to transit information and services.

**Factor Three:**

- 3) **The nature and importance of the program, activities or services provided by Dolores County Senior Services to the LEP population.** Public transportation is a vital service that significantly impacts the quality of life and accessibility for LEP individuals especially those without access to personal vehicles. Dolores County Senior Services provides essential mobility options that enable LEP community members to access employment, healthcare, education, and other critical services. Our transit services play a crucial role in ensuring that language barriers do not prevent individuals from fully participating in community and economic activities. Dolores County Senior Services stands committed to regularly assessing our programs, activities, and services to ensure we continue to provide

meaningful access to LEP persons. We will continue to hold regular facilitated meetings with LEP community members to gather their insights on essential services and to determine the most effective methods for delivering language assistance.

**Factor Four:**

- 4) **The resources available to Dolores County Senior Services for LEP outreach, as well as the costs associated with this outreach.** Dolores County Senior Services has allocated dedicated resources to support LEP outreach initiatives. These include:
- Staffing: Staff training programs.
  - Translation Services: Professional translation for vital documents, transit schedules, and service updates.
  - Technology: Implementation of multilingual website features and mobile applications.
  - Printed Materials: Distribution of translated flyers, notices, and customer service guides.

The current annual expenditure for LEP outreach is approximately \$500. We are exploring further cost efficiencies by leveraging technology solutions and partnering with other grant recipients to share language assistance materials and services.

**Safe Harbor Provision for Written Translations**

Dolores County Senior Services will periodically update this Language Assistance Plan, including monitoring service area demographics for changes in LEP language groups. For any LEP language group that exceeds the Safe Harbor Threshold, written translations of the following vital documents will be made available:

- (1) Title VI Non-Discrimination Notice
- (2) Discrimination Complaint Procedures
- (3) Discrimination Complaint Form

**Language Assistance Service Protocols**

Dolores County Senior Services is committed to providing accessible language assistance services to ensure equitable communication with all community members. In accordance with Title VI and DOT LEP Guidance, our Language Assistance Services include clear protocols and resources for addressing the needs of Limited English Proficiency (LEP) individuals. Our language assistance protocols are as follows:

- Staff is provided a list of written and oral language assistance resources and how they may be obtained.
- Instructions are provided to customer service and other staff who take phone calls from the general public on how to respond to an LEP caller.
- Instructions are provided to customer service and other staff who may receive written communication from the public on how to respond to written communication from an LEP person.
- Instructions are provided to vehicle operators and others who regularly interact with the public on how to interact with an LEP customer.

## **Notice to LEP Persons About the Availability of Language Assistance**

Dolores County Senior Services is dedicated to ensuring that all community members are well-informed about the availability of language assistance services. In line with our commitment under Title VI and our DOT LEP Guidance, we have implemented comprehensive procedures to notify Limited English Proficiency (LEP) persons about available language assistance. This notice system involves the following proactive methods:

- Posting signs in intake areas and other points of entry
- Statements in outreach documents that language services are available
- Announcements at community meetings
- Signs in vehicles
- Website

## **Monitoring, Evaluating and Updating the Language Assistance Plan**

Dolores County Senior Services will monitor its Language Assistance Plan by updating the Four Factor Analysis described herein, establishing a process to obtain feedback from internal staff and members of the public, and conducting internal evaluations to determine whether the language assistance measures are working for staff. Depending on the feedback received, Dolores County Senior Services may choose to disseminate more widely those language assistance measures that are particularly effective or modify or eliminate those measures that have not been effective. Additionally, Dolores County Senior Services will consider new language assistance needs when expanding transit service to areas not previously served.

## **Training Employees to Provide Timely and Reasonable Language Assistance to LEP Populations**

Dolores County Senior Services is committed to ensuring that every member of our community has equal access to our services. In accordance with Title VI of the Federal Transit Administration and the DOT LEP Guidance, we provide the following training to employees on language assistance for LEP populations. This training is designed to equip employees with the knowledge and tools to fulfill our agency's responsibilities, implement our Language Assistance Plan effectively, and understand the significance of delivering services that meet the linguistic and cultural needs of our diverse service area. Our employee training covers:

- A summary of grant recipient responsibilities under the DOT LEP Guidance;
- A summary of the Language Assistance Plan;
- A summary of the number and proportion of LEP persons in the service area, the frequency of contact between the LEP population and the agency's programs and activities, and the importance of the programs and activities to the population
- A description of the type of language assistance that is currently provided and instructions on how staff can access these products and services
- A description of cultural sensitivity policies and practices

**PLANNING AND ADVISORY BOARDS**

The Dolores County Board of County Commissioners will oversee DCSS and staff in the preparation and review of public participation plans, transportation plans, programs, and other related matters. They will appoint a Senior Advisory Board as a specific citizen advisory committee whose members will be selected for their expertise, interest, or as an affected stakeholder. Examples are representatives of interest groups, transit users, minorities, disabled, or a representative of geographic area.

The Transit Advisory Committee (TAC) is a committee that is composed of persons with technical, planning, and or managerial experience and represents diverse community interests.

**Membership of Appointed Senior Advisory Board/Transit Advisory Board**

**Senior Advisory Board/Transit Advisory Committee**

	Gender		Race/Ethnicity				
	Male	Female	White	African American	Native American	Asian American	Hispanic
No.	3	7	9	0	1	0	0
Percent of Total	30%	70%	99 %	0%	1 %	0 %	0 %

Dolores County has a very small minority population, however, we encourage anyone, regardless of race, color or national origin to be a part of the Senior Advisory Board and the Transit Advisory Committee. DCSS campaigns for board and committee members when there is a place available through newsletter publications and through announcements at the meal site. These are voluntary positions and vacancies are filled with anyone who shows interest and who the Board of County Commissioners sees fit.

**FACILITY LOCATION EQUITY ANALYSIS**

In 2015, Dolores County began looking for property to construct a new Senior Center that would also house a dispatch center and vehicle shelter for Dolores County Senior Services’ Senior and Public Transportation. Over time, the services offered to the senior population of Dolores County had outgrown the old facility, which caused a demand for a new building. This new building would help achieve equity for the local population of Dolores County to ensure everyone has a fair and just opportunity to live the healthiest life possible, no matter who they are, where they live, or how much money they make. Dolores County is committed in ensuring

that no person is excluded from participation in, or denied benefits of, its transit services on the basis of race, color, or national origin, as protected by Title VI.

While location, size, price, and other criteria were used to select candidate properties, Dolores County analyzed demographics to ensure the site selection would have no disparate impact due to race, color, or national origin. According to ACS Demographic and Housing Estimates, the total population of Dolores County is 1,841, with only 3.3% of that population being minority. Dolores County is a very rural “Frontier” county with a very small population per square mile. There was no potential displacement of residents at any of the three sites considered in this site selection.

Dolores County is required to conduct a Title VI equity analysis to demonstrate that the facility is selected without regard to race, color, or national origin. Outreach to persons potentially impacted was done by holding Board of County Commissioner meetings that allow for public comment and by conducting surveys to collect public input. Dolores County studied potential locations and reviewed available properties that would have adequate space for the facility. Three sites were considered. One site was not considered because the landowners would not sell the property. One building was not considered because the land would not be sold with the building. The third site was chosen because it was owned by Dolores County and had adequate space, utility availability, and ease of access. No neighborhood in the city of Dove Creek was disqualified from the selection process. Race, color, and national origin of residents were not considered during the identification or evaluation of potential sites.

Dolores County reviewed benefits and burdens of each site to determine any impacts that might adversely affect the community. There was an Environmental Site Assessment done in March 2015 with no contamination issues found. The site selected is a parcel outside the town limits of Dove Creek and bordered by agricultural land, athletic fields, and the Public Service Center. The county is committed to providing a facility that will ensure the continuation of services that are provided to the local population of Dolores County.

## Appendices

Appendix A: FTA Title VI Notice

Appendix B: FTA Title VI Complaint Procedure

Appendix C: FTA Title VI Complaint Form

Appendix D: FTA Title VI Investigations/Complaints Chart

Appendix E: Inclusion& Diversity Statement from DCSS Advisory Board

## NOTIFYING THE PUBLIC OF RIGHTS UNDER TITLE VI

### **DOLORES COUNTY SENIOR SERVICES PUBLIC TRANSPORTATION**

- Dolores County Senior Services operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with Dolores County Senior Services.
- For more information on Dolores County Senior Services' civil rights program, and the procedures to file a complaint, contact 970-677-2787; email [alisa.schultz@dolorescountyCO.gov](mailto:alisa.schultz@dolorescountyCO.gov); or visit our director's office at 8540 RD 7.2, Dove Creek, Colorado 81324
- A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5<sup>th</sup> Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590
- If information is needed in another language, contact 970-677-2787

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by Dolores County Senior Services (hereinafter referred to as “the Authority”) may file a Title VI complaint by completing and submitting the agency’s Title VI Complaint Form. Dolores County Senior Services investigates complaints received no more than 180 days after the alleged incident. The Authority will process complaints that are complete.

Once the complaint is received, the Authority will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office.

The Authority has 10 days to investigate the complaint. If more information is needed to resolve the case, the Authority may contact the complainant. The complainant has 60 business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within 60 business days, the Authority can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

After the investigator reviews the complaint, she/he will issue one of two letters to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. An LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member, or other action will occur. If the complainant wishes to appeal the decision, she/he has 60 days after the date of the letter or the LOF to do so.

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

## Dolores County FTA Title VI Complaint Form

<b>Section I:</b>				
Name:				
Address:				
Telephone (Home):			Telephone (Work):	
Electronic Mail Address:				
Accessible Format Requirements?	Large Print		Audio Tape	
	TDD		Other	
<b>Section II:</b>				
Are you filing this complaint on your own behalf?			Yes*	No
*If you answered "yes" to this question, go to Section III.				
If not, please supply the name and relationship of the person for whom you are complaining:				
Please explain why you have filed for a third party: _____				
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.			Yes	No
<b>Section III:</b>				
I believe the discrimination I experienced was based on (check all that apply):				
<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin				
Date of Alleged Discrimination (Month, Day, Year): _____				
Explain as clearly as possible what happened and why you believe you were 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.				
_____				
_____				
<b>Section IV</b>				
Have you previously filed a Title VI complaint with this agency?			Yes	No
<b>Section V</b>				
Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?				
<input type="checkbox"/> Yes <input type="checkbox"/> No				

If yes, check all that apply:	
<input type="checkbox"/> Federal Agency: _____	
<input type="checkbox"/> Federal Court _____	<input type="checkbox"/> State Agency _____
<input type="checkbox"/> State Court _____	<input type="checkbox"/> Local Agency _____
Please provide information about a contact person at the agency/court where the complaint was filed.	
Name:	
Title:	
Agency:	
Address:	
Telephone:	
<b>Section VI</b>	
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:

Alisa Schultz, Director

PO Box 678

Dove Creek, CO 81324

<b>Type</b>	<b>Date (day(s), month(s), year(s))</b>	<b>Summary (basis – race, color, or national origin)</b>	<b>Status</b>	<b>Action(s) taken</b>
<b>Complaints and Investigations against the subrecipient or its employees</b>				
<b>Lawsuits</b>				

DIVERSITY STATEMENT FOR  
DOLORES COUNTY SENIOR SERVICES ADVISORY BOARD

At Dolores County Senior Services , we are committed to fostering a diverse and inclusive environment that values every individual. To enhance the diversity of our Advisory Board, we will implement targeted recruitment strategies to actively seek qualified candidates. We will build strategic partnerships with community organizations and professional networks to broaden our candidate pool and provide tailored leadership development opportunities. While we acknowledge that our surrounding community is not as diverse as we would like, we remain dedicated to overcoming this challenge through proactive engagement and persistent outreach.

ADOPTED Jan. 13, 2026

Margaret L Webb  
Chairman of the Board

DOLORES COUNTY SENIOR SERVICES  
TITLE VI AND LEP POLICY

FORMAL APPROVAL OF POLICY

This policy has been approved by the Dolores County Board of Commissioners

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Authorized Signature

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Date

Dolores County Senior Services  
8540 Rd 7.2  
PO Box 678  
Dove Creek, CO 81324  
[alisa.schultz@dolorescountyCO.gov](mailto:alisa.schultz@dolorescountyCO.gov)