

Federal Transit Administration

Title VI Program

Holdrege Memorial Homes

2026

Reviewed and Approved by

Eleech A. Olson

Holdrege Memorial Homes
Board of Directors

5-29-2026

Date



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Non-Discrimination Statement of Policy

Under Title VI of the Civil Rights Act of 1964 and related statutes, Holdrege Memorial Homes is committed to ensuring that no person shall, on the grounds of race, color, or national origin, be excluded from participation in, denied the benefits or services of, or be otherwise subjected to discrimination in all programs, services, or activities administered by Holdrege Memorial Homes.



Board President
Holdrege Memorial Homes, Board of Directors



Date

All entities who receive Federal Transit Administration (FTA) grant dollars either directly from the FTA or through the Nebraska Department of Transportation (NDOT) are subject to the Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the U.S. Department of Transportation's implementing regulations. This manual provides technical assistance on Title VI compliance requirements.

1 Introduction and Overview

1.1 Plan Statement

Holdrege Memorial Homes operates a demand response transit program serving Holdrege Memorial Homes residents in the City of Holdrege, Nebraska. As a condition of receiving federal financial assistance to operate these services, the agency ensures that its programs, policies, and activities comply with Title VI of the Civil Rights Act of 1964. The following program details how Holdrege Memorial Homes meets the Title VI requirements set forth in the Federal Transit Administration (FTA) Circular 4702.1B.

Holdrege Memorial Homes receives federal FTA funding through the Nebraska Department of Transportation (NDOT) Transit Section. NDOT administers the Holdrege Memorial Homes FTA transit service funding and provides all Title VI program oversight for Holdrege Memorial Homes.

1.2 Policy

Section 601 under Title VI of the Civil Rights Act of 1964 states the following:

"No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefit of, or be subjected to discrimination under any program or activity receiving Federal financial assistance."

Holdrege Memorial Homes is committed to ensuring that no person, on the basis of race, color, or national origin, shall be excluded from participation in or subjected to discrimination under its programs or services, or be denied the benefits of the level and quality of transit services provided by the agency's employees, affiliates, and contractors.

1.3 Authorizing Legislation

Most federal transit laws are codified at Title 49 U.S.C. Chapter 53. Authorizing legislation is substantive legislation enacted by Congress that establishes or continues the operation of a federal program or agency. FTA's most recent authorizing legislation is entitled the *Bipartisan Infrastructure Law*, signed into law on November 15, 2021.

1.4 How to Contact FTA and Holdrege Memorial Homes

For more information regarding the Holdrege Memorial Homes Title VI Program, please contact the agency at:

Holdrege Memorial Homes
Attn: Brett Tilson, Environmental Services Director
1320 11th Avenue
Holdrege, NE 68949
308-995-8631
btilson@holdregehomes.org

FTA may be contacted at:

Federal Transit Administration

Region 7

901 Locust Street, Suite 404

Kansas City, MO 64106

Phone: 816-329-3920

or

Federal Transit Administration

Office of Civil Rights

Attention: Title VI coordinator

East Building, 5th Floor-TCR

1200 New Jersey Ave., SE,

Washington, D.C. 20590

NDOT may be contacted at:

Nebraska Department of Transportation

Kimberly Baker, Civil Rights Compliance Manager

1500 Nebraska Parkway

P.O. Box 94759

Lincoln, NE 68509-4759

402-479-4544

ndot.civilrights@nebraska.gov

1.5 Governing Body

The governing body of Holdrege Memorial Homes consists of an eleven-member Board of Directors.

1.6 FTA Circular 4702.1B

The Holdrege Memorial Homes Title VI Plan has been developed to address FTA's Title VI requirements and oversight responsibilities. The plan follows the guidelines set forth in FTA Circular 4702.1B.

2 General Reporting Requirements

2.1 Assurances

Holdrege Memorial Homes annually submits its Certifications and Assurances to NDOT. NDOT collects the Holdrege Memorial Homes Title VI Assurances prior to passing through FTA funds.

2.2 Prepare and Submit a Title VI Program

Holdrege Memorial Homes submitted its previous Title VI Program to the NDOT Civil Rights Office in May 2023. The current Title VI Program is intended to fulfill submission requirements for the 2026–2029 reporting period.

The governing body will review and approve the current Title VI Program prior to its submission to NDOT. This approval is documented via the signature line on the cover of this Title VI Program, and subsequent documentation will be submitted with the Holdrege Memorial Homes Title VI Program. The effective date of the Program will be the date of the resolution.

Holdrege Memorial Homes will submit its Title VI Program to the NDOT Civil Rights Office for review and approval.

2.3 Title VI Notice

Holdrege Memorial Homes complies with Title VI and notifies the public of the protections against discrimination afforded to them by Title VI. The notice is posted in the following public locations: (a) at a visible public location at the Holdrege Memorial Homes main office; and (b) at a visible location in transit vehicles. This notice has been translated in accordance with NDOT's limited English proficiency (LEP) plan.¹ See **Appendix A** for a copy of the Holdrege Memorial Homes Title VI notice to the public.

2.4 Title VI Complaint Procedure and Complaint Form

Holdrege Memorial Homes has adopted the NDOT procedures and forms for investigating and tracking Title VI complaints of discrimination. The following complaint procedures are patterned after the FTA's requirements and guidance.

All FTA-related Title VI complaints filed against Holdrege Memorial Homes are forwarded to both the NDOT Civil Rights Compliance Manager and the NDOT Transit Program Manager in the Local Assistance Division for processing, in coordination with the NDOT Civil Rights Office. Holdrege Memorial Homes will maintain a log of all complaints received (see **Appendix D**), including the following:

- The date the complaint was filed
- A description of the complaint
- Dates of all significant actions taken
- All correspondence with the complainant or respondent

NDOT will review all complaints for programs and activities receiving FTA financial assistance.

The Holdrege Memorial Homes Title VI complaint procedures and forms are available to the public by request. The Title VI Complaint Form has been translated in accordance with NDOT's LEP plan and is provided in **Appendix B**.

The following section describes the Holdrege Memorial Homes Title VI complaint procedures.

2.4.1 Filing a Transit-Related Complaint with Holdrege Memorial Homes

Persons Eligible to File

Any person who believes they, or any program beneficiary, has been subjected to unequal treatment or discrimination in their receipt of transit benefits and/or services on the basis of race, color, or national origin may file a Title VI complaint with Holdrege Memorial Homes. Complaints may be filed directly by the affected individual(s) or by a representative on their behalf.

Complaint Substance and Format

To file a complaint with Holdrege Memorial Homes, complainants should complete and submit the agency's Title VI Complaint Form or submit a written letter containing the following information:

¹ <https://dot.nebraska.gov/media/rngflsav/ndot-limited-english-proficiency-plan.pdf>

- The name(s) of the persons(s) filing the complaint (the complainant)
- Mailing address and phone number of the complainant(s)
- Name of the person(s) or entity alleged to have engaged in discrimination
- Date of the incident
- A detailed description of the incident
- An explanation of how the incident involved discrimination based on race, color, or national origin
- The names, mailing addresses, and phone numbers of witnesses or third parties to the incident
- Any additional information relevant to the complaint

A complaint may be filed on behalf of another person with their expressed written consent. The Title VI Complaint Form or letter of complaint must be signed by the complainant or by their authorized representative.

Time Frame for Filing Complaints

Complaints must be received no more than 180 calendar days after the alleged incident and must involve allegations of discrimination on the basis of race, color, or national origin to be investigated as an unlawful discriminatory practice under Title VI. FTA may grant an extension.

If Holdrege Memorial Homes receives a complaint, Holdrege Memorial Homes will submit the complaint to the NDOT Civil Rights Office for review.

After a complaint is received, an NDOT investigator will determine whether it meets the criteria and whether NDOT has jurisdiction. The complainant will receive an acknowledgement letter by mail about whether the investigation will proceed.

Processing and Investigating Complaints

NDOT strives to complete investigations within 90 days. At any time during the investigation, the investigator may request additional information to assist in the investigation of the incident. The complainant will be given 15 business days to respond to the request for additional information. If NDOT is not contacted by the complainant or does not receive the additional information within 15 business days, NDOT can administratively close the case. The case can be administratively closed if the complainant no longer wants to pursue the case.

Closing a Complaint

After NDOT reviews the complaint, one of two letters will be issued to the complainant: a closure letter or a letter of finding. A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. A letter of findings 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. Complainants have 30 days to appeal the findings of the investigation.

Contact Information

For additional questions regarding the Holdrege Memorial Homes Title VI complaint procedures or Title VI Program, individuals may contact Holdrege Memorial Homes at the contact information provided in **Section 1.4**. For more information on NDOT's Title VI complaints procedure or Title VI

Program or for assistance placing a complaint in writing or for language assistance, contact the NDOT Civil Rights Office using the information in **Section 1.4**.

2.4.2 Holdrege Memorial Homes Title VI Complaint Form

See **Appendix B** for a copy of the Holdrege Memorial Homes Title VI Discrimination Complaint Form.

2.5 List of Title VI Investigations, Complaints, and Lawsuits

As of the current Title VI Program submission, no transit-related complaints specific to Title VI were filed; therefore, there are no incidents to track or report. Holdrege Memorial Homes would use the Complaint and Lawsuit Tracking Form in **Appendix D** to conduct an investigation, receive a complaint, or file a lawsuit alleging discrimination on the basis of race, color, or national origin. Holdrege Memorial Homes will report all Title VI complaints to the NDOT Civil Rights Office and FTA.

2.6 Inclusive Public Participation

The Holdrege Memorial Homes public involvement strategy is intended to promote awareness and provide ample opportunity for the public to participate in the Holdrege Memorial Homes transportation decision-making surrounding projects, fares and/or service charges, and application for federal operating assistance. Examples include the following:

- Ensuring the timely dissemination of information to the public
- Considering the input and encouraging the participation of underserved groups in the Holdrege Memorial Homes transportation decision-making process
- Granting timely public notice and an adequate review period through this process
- Facilitating adequate public review of major project revisions
- Granting the opportunity for the review of proposed and final plans
- Encouraging and documenting public comment

For these purposes, Holdrege Memorial Homes will announce and hold a public hearing in the event of a fare increase, major change in service, or capital construction project. Additionally, Holdrege Memorial Homes will provide adequate public notice in the event of a vehicle purchase or when submitting an application for state or federal operating assistance funds with no major service changes or fare increases.

For the purpose of definition, a major change or reduction service will include a reduction in total system vehicle-hours of 10 percent or more, the elimination of service in an area with a population of 2,000 or more, the elimination of service on one or more days of the week, or a change in the type of transit service in an area with a population of 2,000 or more. A fare increase will include an increase in single ride fare for any transit service including other fare categories or a decrease in the discount(s) offered for fare categories.

Public hearings will be advertised in a newspaper of general circulation in the geographic area the project will serve at least 15 calendar days in advance of the public hearing, and the comment period will extend 15 days following the public hearing. Notice of hearings will include a concise description of the proposed project and will advertise the availability of translated copies of said hearing notice and/or other publicly released meeting documents in accordance with the Holdrege Memorial Homes Language Assistance Plan (LAP). Hearings will be held in accessible locations and at times convenient for public attendance.

Written or verbal comments from the public will be accepted during and for 15 days following the public hearing. These comments will be reviewed as part of the agency's decision-making process surrounding transportation projects.

An agency staff member will record and prepare formal minutes of the public hearing. These minutes will be available to the public on request. Translations of these minutes, as well as other publicly released meeting documents (e.g., announcements, surveys, comment cards), will be made available to members of the public on request. The availability of translated minutes and other public documents will be advertised on the agency's public hearing notice.

2.6.1 Summary of Past Outreach Efforts

Because Holdrege Memorial Homes provides services in addition to transportation, it engages in public outreach strategies that differ from traditional promotional activities for public transit, including partnerships with local agencies and participation in community events. However, Holdrege Memorial Homes will continue to follow the public participation strategy for requests for operating assistance or acquisitions of new technologies, services, or equipment. Reasonable steps will be taken to accommodate LEP persons encountered as a result of this process.

2.7 Providing Meaningful Access to LEP Persons

Holdrege Memorial Homes does not provide transportation to the general public; transportation is provided exclusively to Holdrege Memorial Homes residents in Holdrege. Holdrege Memorial Homes personnel report that contact with LEP persons is very rare, with no LEP clients currently in contact with the program. However, the following analysis was completed to inform a LAP that considers the needs of LEP persons who could potentially be encountered by the agency as it administers its programs in the service area.

To facilitate this analysis, 2020–2024 American Community Survey data were analyzed for the agency's service area to inform the four-factor analysis. The data show that the number and proportion of LEP persons in the service area is low, with approximately 94.0 percent of the population estimated to speak only English. These results and the Holdrege Memorial Homes four-factor analysis can be found in **Appendix C**.

2.7.1 Service Area Profile Conclusions

Based on the four-factor analysis, the number and proportion of non-English-speaking LEP persons in the Holdrege Memorial Homes area is very low, with no non-English language groups exceeding the Safe Harbor Threshold of 1,000 or more LEP persons or greater than 5 percent of the service area population. As a result, Holdrege Memorial Homes has not identified a current need to develop additional language assistance measures. However, if staff encounter LEP individuals, employees are trained to respond appropriately and provide meaningful access to services using language assistance resources, as detailed in the LAP.

2.7.2 Language Assistance Plan

Holdrege Memorial Homes has access to language assistance resources through publicly available translation applications. If Holdrege Memorial Homes holds a public hearing, distributed meeting documents, including meeting minutes, can be translated using these resources. These services can be used whenever in-person or over-the-phone interpretation is required to assist riders. The agency will also take reasonable steps to support LEP individuals who may choose to access its programs and services in the future.

Using NDOT resources, the Holdrege Memorial Homes Title VI Notice to the Public, Discrimination Complaint Form, and Discrimination Complaint Procedures Form have been translated into Spanish for public distribution.

Additionally, "I Speak" cards will be available at the agency's main office. These cards allow LEP individuals to quickly identify their spoken language when it cannot be easily determined by staff. This tool will help Holdrege Memorial Homes identify language assistance needs as they arise and ensure appropriate support is provided.

2.7.3 Monitoring and Updating the Holdrege Memorial Homes LAP

Holdrege Memorial Homes understands that language needs will change as the service area population changes. Holdrege Memorial Homes will revisit the LAP every 3 years and make appropriate changes. Updates may include the following:

- The number of documented LEP person contacts encountered since the last update
- Description of how the needs of LEP persons have been addressed
- Determination of the current LEP population in the agency service area
- Determination of whether the need for language assistance has changed
- Determination of whether local language assistance has been effective and sufficient at meeting needs
- Determination of whether the agency's available outreach resources are sufficient to supply necessary language assistance
- Determination of whether complaints have been received concerning the agency's failure to meet the needs of LEP persons

2.7.4 Employee Training

Holdrege Memorial Homes personnel are required to review the current Title VI Program document and sign a written statement declaring their understanding of their obligation to provide service regardless of race, color, or national origin.

Necessary personnel will be familiar with the agency's procedures for handling a potential Title VI complaint.

Brett Tilson, Environmental Services Director, has taken part in the Title VI planning and training sessions through NDOT.

Additional resources for employee training include a Title VI training course hosted by NDOT and ongoing Title VI assistance and oversight provided by the NDOT Civil Rights Office.

2.8 Planning and Advisory Bodies

Holdrege Memorial Homes does not have a transit-related, non-elected planning board, advisory council, or other committee. In the event such a committee were established prior to the Holdrege Memorial Homes next Title VI program submission, the demographic makeup of the planning board or committee would be summarized, as required.

2.9 Equity Analysis to Determine Site or Location of Facilities

Holdrege Memorial Homes will complete a Title VI equity analysis during the planning stage for construction projects using FTA funds with regard to where a project is located or sited and to compare the impact of siting alternatives. The purpose of the equity analysis will be to ensure that the determination of the site or location of facilities was made without denying anyone the benefits of the federally funded program or subjecting anyone to discrimination on the basis of race, color, or national origin. Copies of subsequent equity analyses will be included in NDOT's 2029 Title VI Program submission. Holdrege Memorial Homes will complete an equity analysis for projects related to facilities, including storage facilities, maintenance facilities, and operations centers. NDOT follows the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970.

As of the publication of this Title VI Program Plan, no new location or existing facility upgrade is programmed for the time period of this plan. If one is programmed after approval, it will be amended into this document as an appendix.

3 Requests for Additional Information

Holdrege Memorial Homes will fully cooperate with any FTA investigation of discrimination complaints to the extent required by Title VI regulations of FTA Circular 4702.1B.

Appendix A

Holdrege Memorial Homes Title VI Notice

Title VI Notice to the Public

Holdrege Memorial Homes operates its programs and services without regard to race, color, or national origin in accordance with Title VI of the Civil Rights Act. Any person who believes they have been aggrieved by an unlawful discriminatory practice under Title VI may file a complaint of discrimination by completing and submitting the agency's Title VI Discrimination Complaint Form. This form can be requested by contacting Brett Tilson, Environmental Services Director, at the address provided below.

To request more information on the agency's Title VI obligations or to obtain a detailed description of the agency's Title VI discrimination complaint procedures, please visit the agency website or contact the agency using the information provided. A telephone interpreter can be provided to assist persons of limited English proficiency.

Questions about Title VI? Please contact:

¿Preguntas sobre el Título VI? Por favor comuníquese con:



Subrecipient Organization: Holdrege Memorial Homes
Attn: Brett Tilson, Environmental Services Director

Mailing Address: 1320 11th Avenue
City, State, ZIP: Holdrege, NE 68949



Phone: (308) 995-8631



Email: btilson@holdregehomes.org

Notificación al Público sobre el Título VI

Holdrege Memorial Homes opera sus programas y servicios sin tomar en cuenta raza, color, u origen nacionalidad de conformidad con el Título VI del Acta de Derechos Civiles. Cualquier persona que crea que ha sido agraviada por cualquier práctica discriminatoria ilegal bajo el Título VI puede presentar una queja de discriminación al completar y enviar el Formulario de Queja de Discriminación de Título VI de la agencia. Este formulario se puede descargar solicitar comunicándose con Brett Tilson, Environmental Services Director, a la dirección proporcionada arriba.

Para solicitar mas información sobre las obligaciones de Título VI de la agencia o para obtener una descripción detallada del procedimiento de Quejas de Discriminación del Título VI, favor de visitar la pagina de la agencia o contactar la agencia a la dirección proporcionada arriba. Un interprete telefónico está disponible para asistir personas de dominio de Inglés limitado.



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DEPARTMENT OF TRANSPORTATION

Appendix B

Holdrege Memorial Homes Title VI Discrimination Complaint Form

Title VI Discrimination Complaint Form

Please complete, sign, and return this form to the address listed at the bottom of the page.

Complainant name												
Address				City			State			Zip code		
Phone				Email								

Person discriminated against, if different from complainant												
Address				City			State			Zip code		
Phone				Email								

Type of discrimination:	☐ Race/Color	☐ Age	☐ Sex	☐ National origin	☐ Disability	☐ Other
Date of incident						

Please provide the date and location of the alleged discriminatory actions, including both the earliest and most recent incidents.

--

Please provide a brief and clear account of the discriminatory incident, including details of what happened, who was involved and any differential treatment compared to others. You may also include supporting materials for your complaint. Please attach any additional written or supporting information that you believe is relevant to this complaint.

--

Please provide the names and contact information of persons, including witnesses or others, whom we may contact for additional information to investigate your complaint.

--

To process your complaint, please ensure it is signed and dated below.		MAIL 	Holdrege Memorial Homes 1320 11 th Avenue Holdrege, NE 68949 btilson@holdregehomes.org
Signature		EMAIL 	
Date			

OFFICE USE ONLY

Received by		Date received	
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Título VI Formulario de queja por discriminación

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Complete, firme y envíe este formulario a la dirección que aparece en la parte inferior de la página.

Nombre del denunciante							
Dirección		Ciudad		Estado		Código postal	
Teléfono		Correo electrónico					

Víctima de la discriminación, si es diferente del denunciante							
Dirección		Ciudad		Estado		Código postal	
Teléfono		Correo electrónico					

Tipo de discriminación:	☐ Raza/Color	☐ Edad	☐ Sexo	☐ Nación de origen	☐ Discapacidad	☐ Otra opción
Fecha del incidente						

Proporcione la fecha y el lugar de las supuestas acciones discriminatorias, incluidos tanto los incidentes más tempranos como los más recientes.

--

Proporcione un informe breve y claro del incidente discriminatorio, incluidos los detalles de lo que sucedió, quién estuvo involucrado y cualquier tratamiento diferencial en comparación con otros. También puede incluir materiales de respaldo para su queja. Adjunte cualquier información adicional por escrito o de apoyo que considere relevante para esta queja.

--

Proporcione los nombres y la información de contacto de las personas, incluidos los testigos u otras personas, con quienes podamos comunicarnos para obtener información adicional para investigar su queja.

--

Para procesar su queja, asegúrese de que esté firmada y fechada a continuación.	
Firma	
Fecha	

DIRECCIÓN
POSTAL



CORREO
ELECTRÓNICO



Holdrege Memorial Homes

1320 11th Avenue

Holdrege, NE 68949

btilson@holdregehomes.org

SOLO PARA USO DEL OFICINA

Recibido por		Fecha de recepción	
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Appendix C

Holdrege Memorial Homes Four-Factor Analysis and Language Assistance Plan

Holdrege Memorial Homes Four-Factor Analysis

Holdrege Memorial Homes does not provide transportation to the general public; transportation is provided exclusively to Holdrege Memorial Homes residents in Holdrege, Nebraska. Holdrege Memorial Homes personnel report that contact with clients of limited English proficiency (LEP) is rare, with no recent reported contact. However, the following analysis was completed to inform a Language Assistance Plan that considers the needs of LEP persons who could potentially be encountered by the agency as it administers its programs in the service area.

To facilitate this analysis, 2020–2024 American Community Survey data were analyzed for the agency's service area to inform the four-factor analysis. The data show that the number and proportion of LEP persons in the service area is very low, with approximately 94.0 percent of the population estimated to speak only English.

Based on the four-factor analysis, the number and proportion of non-English-speaking LEP persons in the Holdrege Memorial Homes area is very low, with no non-English language groups exceeding the Safe Harbor Threshold of 1,000 or more LEP persons or greater than 5 percent of the service area population. Moreover, agency personnel report that contact with LEP persons is rare. As a result, Holdrege Memorial Homes has not identified a current need to develop additional language assistance measures. However, if staff encounter LEP individuals, employees are trained to respond appropriately and provide meaningful access to services using language assistance resources, as detailed in the Language Assistance Plan.

Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient

Holdrege Memorial Homes does not provide transportation to the general public; transportation is provided exclusively to its residents in Holdrege. To estimate the number and proportion of LEP individuals in the service area, data from the 2020–2024 American Community Survey were reviewed. For this analysis, "LEP" is defined as individuals who speak English less than "very well." LEP may also refer to individuals with limited ability to read, write, or understand English.

The following explains the Holdrege Memorial Homes service area LEP profile:

- The total number of persons over the age of 5 in Holdrege is 5,147
- Approximately 94.0 percent of this total population speak English only.
- Spanish is the largest non-English language group in the Holdrege Memorial Homes service area. This language group is estimated to be 93 LEP persons, or approximately 1.8 percent of the area's total population.
- Other language groups in the service area contained a low number or proportion of LEP persons that did not surpass the Safe Harbor Threshold of 1,000 LEP persons or greater than 5 percent proportion of LEP persons in the service area.

Factor 1a: How LEP persons interact with the agency

Holdrege Memorial Homes does not provide transportation to the public; transportation is provided exclusively to its residents. Any LEP interactions will most likely occur while scheduling or providing transportation.

Factor 1b: Literacy skills of LEP persons in their native language to determine whether the translation of written documents will be an effective practice

No data could be obtained regarding the native language literacy of LEP persons in the Holdrege Memorial Homes service area nor does the agency maintain such data at this time. If additional data becomes available, it will be incorporated into future analyses. Based on current resources and practices, the agency does not anticipate significant barriers to service due to literacy limitations.

Factor 1c: Whether LEP persons are underserved due to language barriers

Given the low number and proportion of LEP individuals in the service area and the limited contact reported by staff, the agency does not anticipate language to be a barrier to accessing services.

Factor 2: Frequency of contact with LEP persons

Based on the current interactions with LEP individuals, the agency does not anticipate language to be a barrier to accessing services.

Factor 3: Nature and importance of the program, activity, or service

Holdrege Memorial Homes offers transportation for its residents, providing greater mobility and access to critical services. Trip purposes include medical appointments, traveling to work or residences, social activities, and engaging in regular daily activities. These services are deemed important for its clients' lives.

Factor 4: Resources available and associated costs

Holdrege Memorial Homes has access to Title VI template documents (e.g., Title VI Notice to the Public, Title VI Complaint Form) and general Title VI assistance and oversight.

Language Assistance Plan

Holdrege Memorial Homes has access to language assistance resources through publicly available translation applications. If Holdrege Memorial Homes holds a public hearing, distributed meeting documents, including meeting minutes, can be translated using these resources. These services can be used whenever in-person or over-the-phone interpretation is required to assist riders. The agency will also take reasonable steps to support LEP individuals who may choose to access its programs and services in the future.

Using NDOT resources, Holdrege Memorial Homes's Title VI Notice to the Public, Discrimination Complaint Form, and Discrimination Complaint Procedures Form have been translated into Spanish for public distribution.

Additionally, "I Speak" cards will be available at the agency's main office. These cards allow LEP individuals to quickly identify their spoken language when it cannot be easily determined by staff. This tool will help Holdrege Memorial Homes identify language assistance needs as they arise and ensure appropriate support is provided.

Appendix D

Holdrege Memorial Homes Title VI Complaint Investigation Log

Title VI Complaint and Lawsuit Tracking Form

Title VI Complaints

Complainant Name	Date of Incident	Date Filed	Summary of Complaint (include basis of complaint: race, color, or national origin)	Complaint resulted in investigation? (Y/N)	Status of complaint: active or closed?	Summary of Findings OR Reason Complaint was not Investigated (N/A if active)	Notes

Title VI Lawsuits

Name of Plaintiff	Date of Incident	Date Filed	Allegation(s)	Status: Active or Closed?	Result (N/A if active)	Notes

Submitted by:

Subrecipient Organization: Holdrege Memorial Homes
Attn: Brett Tilson, Environmental Services Director
Address: 1320 11th Avenue
City, State, ZIP: Holdrege, NE 68949
Phone: (308) 995-8631
Email: btilson@holdregehomes.org



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