

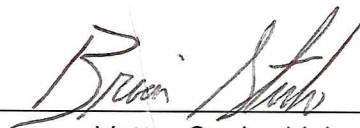
Federal Transit Administration

Title VI Program

VSL Lincoln Sumner LLC

2026

Reviewed and Approved by



Vetter Senior Living Board of Directors
VSL Lincoln Sumner LLC

3/27/20

Date

NEBRASKA

Good Life. Great Journey.

DEPARTMENT OF TRANSPORTATION



Contents

1	Introduction and Overview	1-1
1.1	Plan Statement	1-1
1.2	Policy	1-1
1.3	Authorizing Legislation	1-1
1.4	How to Contact FTA and the VSL Lincoln Sumner LLC	1-1
1.5	Governing Body	1-2
1.6	FTA Circular 4702.1B	1-2
2	General Reporting Requirements	2-2
2.1	Assurances.....	2-2
2.2	First-Time Applicant	2-2
2.3	Prepare and Submit a Title VI Program	2-3
2.4	Title VI Notice.....	2-3
2.5	Title VI Complaint Procedure and Complaint Form.....	2-3
2.5.1	Filing a Transit-Related Complaint with the VSL Lincoln Sumner LLC	2-4
2.5.2	VSL Lincoln Sumner LLC Title VI Complaint Form	2-5
2.6	List of Title VI Investigations, Complaints, and Lawsuits.....	2-5
2.7	Inclusive Public Participation.....	2-5
2.7.1	Summary of Past Outreach Efforts.....	2-6
2.8	Providing Meaningful Access to LEP Persons	2-6
2.8.1	Service Area Profile Conclusions.....	2-7
2.8.2	Language Assistance Plan.....	2-7
2.8.3	Monitoring and Updating the VSL Lincoln Sumner LLC LAP	2-7
2.8.4	Team Member Training	2-7
2.9	Planning and Advisory Bodies	2-8
2.10	Equity Analysis to Determine Site or Location of Facilities.....	2-8
3	Requests for Additional Information.....	3-8

Appendices

- A. VSL Lincoln Sumner LLC Title VI Notice
- B. VSL Lincoln Sumner LLC Title VI Discrimination Complaint Form
- C. VSL Lincoln Sumner LLC Four-Factor Analysis and Language Assistance Plan
- D. VSL Lincoln Sumner LLC Title VI Complaint Investigation Log

Non-Discrimination Statement of Policy

Under Title VI of the Civil Rights Act of 1964 and related statutes, VSL Lincoln Sumner LLC 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 VSL Lincoln Sumner LLC.



Vetter Senior Living Board of Directors

VSL Lincoln Sumner LLC

3/27/20

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

VSL Lincoln Sumner LLC, a skilled nursing and rehabilitation subsidiary of Vetter Senior Living (VSL), operates a demand response public transit program serving the short- and long-term residents of the Sumner Place Skilled Nursing and Rehabilitation facility in Lincoln, Nebraska. Transportation is provided in the VSL network and surrounding areas. 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 the VSL Lincoln Sumner LLC meets the Title VI requirements set forth in the Federal Transit Administration (FTA) Circular 4702.1B.

The VSL Lincoln Sumner LLC receives federal FTA funding through the Nebraska Department of Transportation (NDOT) Transit Section. NDOT administers the VSL Lincoln Sumner LLC FTA transit service funding and provides all Title VI program oversight for the VSL Lincoln Sumner LLC.

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."

VSL Lincoln Sumner LLC 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 team members, 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 the VSL Lincoln Sumner LLC

For more information regarding the VSL Lincoln Sumner LLC's Title VI Program, please contact the agency at:

VSL Lincoln Sumner LLC
Attn: Olivia Fisher, Senior Accountant
20220 Harney Street
Elkhorn, NE 68022
402-895-3932
ofisher@vhsmail.com

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 VSL Lincoln Sumner LLC is the Vetter Senior Living Board of Directors, comprising four members representing VSL chosen by the leadership team.

1.6 FTA Circular 4702.1B

VSL Lincoln Sumner LLC's 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

VSL Lincoln Sumner LLC will annually submit its Certifications and Assurances to NDOT. NDOT will collect the VSL Lincoln Sumner LLC's Title VI Assurances prior to passing through FTA funds.

2.2 First-Time Applicant

VSL Lincoln Sumner LLC is a first-time applicant for FTA 5310 funds, and in accordance with the requirements under the Title VI regulations of FTA Circular 4702.1B, will submit its Assurances to NDOT. Because Sumner Place is a subsidiary of the VSL network, there are additional federal funds provided through the Department of Health and Human Services (DHHS), and a Title VI Program has been established through DHHS for prior years. At this time, no complaints or investigations have occurred for VSL Lincoln Sumner LLC under its current Title VI Program. A summary of the non-

discrimination and language assistance plans are available on Sumner Place's website at <https://www.sumnerplacecare.com/nondiscrimination/>.

2.3 Prepare and Submit a Title VI Program

The VSL Lincoln Sumner LLC Title VI Program is intended to fulfill submission requirements for the 2026–2029 reporting period.

The Vetter Senior Living Board of Directors 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 VSL Lincoln Sumner LLC's Title VI Program. The effective date of the Program will be the date of the resolution.

VSL Lincoln Sumner LLC will submit its Title VI Program to the NDOT Civil Rights Office for review and approval.

2.4 Title VI Notice

VSL Lincoln Sumner LLC 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) on the VSL Lincoln Sumner LLC website (<https://www.sumnerplacecare.com/nondiscrimination/>); (b) at a visible public location at the VSL Lincoln Sumner LLC's main office; and (c) 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 VSL Lincoln Sumner LLC's Title VI notice to the public.

2.5 Title VI Complaint Procedure and Complaint Form

VSL Lincoln Sumner LLC 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 VSL Lincoln Sumner LLC 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. VSL Lincoln Sumner LLC 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 VSL Lincoln Sumner LLC's Title VI complaint procedures and forms are available to members of the public at <https://www.sumnerplacecare.com/nondiscrimination/> or 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 VSL Lincoln Sumner LLC's Title VI complaint procedures.

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

2.5.1 Filing a Transit-Related Complaint with the VSL Lincoln Sumner LLC

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 the VSL Lincoln Sumner LLC. 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 VSL Lincoln Sumner LLC, complainants should complete and submit the agency's Title VI Complaint Form or submit a written letter containing the following information:

- 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 VSL Lincoln Sumner LLC receives a complaint, VSL Lincoln Sumner LLC 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 team member, or other action will occur. Complainants have 30 days to appeal the findings of the investigation.

Contact Information

Complaint forms are available on the VSL Lincoln Sumner LLC website at <https://www.sumnerplacecare.com/nondiscrimination>. For additional questions regarding the VSL Lincoln Sumner LLC's Title VI complaint procedures or Title VI Program, individuals may contact the VSL Lincoln Sumner LLC 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**.

2.5.2 VSL Lincoln Sumner LLC Title VI Complaint Form

See **Appendix B** for a copy of the VSL Lincoln Sumner LLC's Title VI Discrimination Complaint Form.

2.6 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. VSL Lincoln Sumner LLC 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. VSL Lincoln Sumner LLC will report all Title VI complaints to the NDOT Civil Rights Office and FTA.

2.7 Inclusive Public Participation

VSL Lincoln Sumner LLC's public involvement strategy is intended to promote awareness and provide ample opportunity for the public to participate in the VSL Lincoln Sumner LLC's 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 VSL Lincoln Sumner LLC's 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, VSL Lincoln Sumner LLC will announce and hold a public hearing in the event of a fare increase, major change in service, or capital construction project. Additionally, VSL Lincoln Sumner LLC 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 VSL Lincoln Sumner LLC's 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 team 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.

2.7.1 Summary of Past Outreach Efforts

Because the VSL Lincoln Sumner LLC provides services in addition to transportation, it engages in several public outreach strategies that differ from traditional promotional activities for public transit, including partnerships with local hospitals and participation in community events. VSL Lincoln Sumner LLC maintains relationships with the hospitals in the area for patient discharge referrals and informs residents of the transportation options available at time of admission.

VSL Lincoln Sumner LLC personnel report interactions with LEP persons, an estimate supported by the LAP four-factor analysis. The agency's current public participation strategy has been reviewed and revised to provide opportunities for meaningful access and participation by LEP persons.

2.8 Providing Meaningful Access to LEP Persons

VSL Lincoln Sumner LLC does not provide transportation to the general public; transportation is provided exclusively to clientele of Sumner Place Skilled Nursing and Rehabilitation facility in Lincoln, Nebraska, and surrounding areas specific to resident needs. The VSL Lincoln Sumner LLC personnel report that contact with LEP persons is common, with non-English-speaking residents currently living at the care facility, noting both Spanish- and Russian-speaking residents. The following analysis was completed to inform an 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 very low, with approximately 95 percent of the population estimated to speak only English. These results and the VSL Lincoln Sumner LLC four-factor analysis can be found in **Appendix C**.

2.8.1 Service Area Profile Conclusions

Based on the four-factor analysis, the number and proportion of non-English-speaking LEP persons in the VSL Lincoln Sumner LLC 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. However, there are currently non-English speaking residents in contact with the VSL Lincoln Sumner LLC; therefore, the agency has identified a current need to develop additional language assistance measures. If team members encounter LEP individuals, team members are trained to respond appropriately and provide meaningful access to services, as detailed in the LAP, using language assistance resources available through NDOT.

2.8.2 Language Assistance Plan

VSL Lincoln Sumner LLC has access to language assistance resources through publicly available translation applications. If VSL Lincoln Sumner LLC holds a public hearing, distributed meeting documents, including meeting minutes, can be translated using available 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, VSL Lincoln Sumner LLC's Title VI Notice to the Public, Discrimination Complaint Form, and Discrimination Complaint Procedures Form have been translated into Spanish for public distribution and for posting on the agency's website.

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 team members. This tool will help the VSL Lincoln Sumner LLC identify language assistance needs as they arise and ensure appropriate support is provided.

2.8.3 Monitoring and Updating the VSL Lincoln Sumner LLC LAP

The VSL Lincoln Sumner LLC understands that language needs will change as the Lincoln, Nebraska, and surrounding area's population changes. The VSL Lincoln Sumner LLC 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

2.8.4 Team Member Training

VSL Lincoln Sumner LLC's 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.

Olivia Fisher, Senior Accountant, has taken part in the Title VI planning and training sessions through NDOT.

VSL Lincoln Sumner LLC's personnel and transportation coordinators are assigned to review the annual training presentation recording through NetLearning, which is a program used to regularly educate team members. Additional resources for team member training include a Title VI training course hosted by NDOT and ongoing Title VI assistance and oversight provided by the NDOT Civil Rights Office.

2.9 Planning and Advisory Bodies

VSL Lincoln Sumner LLC 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 VSL Lincoln Sumner LLC's next Title VI program submission, the demographic makeup of the planning board or committee would be summarized, as required.

2.10 Equity Analysis to Determine Site or Location of Facilities

VSL Lincoln Sumner LLC 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. VSL Lincoln Sumner LLC 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

The VSL Lincoln Sumner LLC 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

VSL Lincoln Sumner LLC Title VI Notice

Title VI Notice to the Public

The VSL Lincoln Sumner LLC 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 downloaded on the subrecipient's website at <https://www.sumnerplacecare.com/> or requested by contacting Olivia Fisher, Senior Accountant, 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: VSL Lincoln Sumner LLC

Attn: Olivia Fisher, Senior Accountant

Mailing Address: 20220 Harney Street
City, State, ZIP: Elkhorn, NE 68022



Phone: 402-895-3932



Email: ofisher@vhsmail.com



Website:
<https://www.sumnerplacecare.com/>

Notificación al Público sobre el Título VI

VSL Lincoln Sumner LLC 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 del sitio web del subreceptor en <https://www.sumnerplacecare.com/> o solicitarse comunicándose con Olivia Fisher, Senior Accountant, 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.



NEBRASKA
Good Life. Great Journey.
DEPARTMENT OF TRANSPORTATION

Appendix B

VSL Lincoln Sumner LLC 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.

Signature

Date



EMAIL  <mailto:ndot.civilrights@nebraska.gov>
ofisher@vhsmail.com

VSL Lincoln Sumner LLC

20220 Harney Street

Elkhorn, NE 68022

OFFICE USE ONLY

Received by

Date received

Título VI Formulario de queja por discriminación NEBRASKA

Good Life. Great Journey.
DEPARTMENT OF TRANSPORTATION

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



VSL Lincoln Sumner LLC
20220 Harney Street
Elkhorn, NE 68022

ofisher@vhsmail.com

SOLO PARA USO DEL OFICINA

Recibido por		Fecha de recepción	
--------------	--	--------------------	--

Appendix C

VSL Lincoln Sumner LLC Four-Factor Analysis and Language Assistance Plan

VSL Lincoln Sumner LLC Four-Factor Analysis

VSL Lincoln Sumner LLC does not provide transportation to the general public; transportation is provided exclusively to clientele of Sumner Place facilities in Lincoln, Nebraska, and surrounding areas. VSL Lincoln Sumner LLC personnel report that contact with clients of limited English proficiency (LEP) is common, with recent reported contacts with LEP clients speaking both Spanish and Russian. 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 95 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 VSL Lincoln Sumner LLC 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. However, the agency personnel report that contact with LEP persons is common. As a result, VSL Lincoln Sumner LLC has identified a current need to develop additional language assistance measures. If team members encounter LEP individuals, team members are trained to respond appropriately and provide meaningful access to services, as detailed in the Language Assistance Plan, using language assistance resources available through Vetter Senior Living.

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

VSL Lincoln Sumner LLC does not provide transportation to the general public; transportation is provided exclusively to clientele of Sumner Place facilities in Lincoln, Nebraska, and surrounding areas. 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 VSL Lincoln Sumner LLC service area LEP profile:

- The total number of persons over the age of 5 in Lincoln is 31,932.
- Approximately 94.9 percent of this total population speak English only.
- Spanish is the largest non-English language group in the VSL Lincoln Sumner LLC service area. This language group is estimated to be 322 LEP persons, or approximately 1.0 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

VSL Lincoln Sumner LLC does not provide transportation to the general public; transportation is provided exclusively to VSL Lincoln Sumner LLC clients. 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 complete data on native language literacy was available; however, VSL Lincoln Sumner LLC reported that there are two residents currently receiving care at its facility who are non-English speakers, speaking Spanish and Russian. 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

Based on current interactions with LEP individuals and the language assistance available through the larger Vetter Senior Living network, the agency does not anticipate language to be a barrier to accessing services.

Factor 2: Frequency of contact with LEP persons

VSL Lincoln Sumner LLC personnel report that interaction with LEP individuals while administering programs and services is common.

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

VSL Lincoln Sumner LLC is a skilled nursing facility that enables people with assisted living needs to participate in life to the degree they want. The agency regularly provides transportation for facility residents to the hospitals and on personal outings as needed, giving them greater mobility and access to critical services. Trip purposes include doctor appointments, social activities, and engaging in regular daily activities. These services are deemed important for their clients' lives.

Factor 4: Resources available and associated costs

VSL Lincoln Sumner LLC 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

VSL Lincoln Sumner LLC has access to language assistance resources through publicly available translation applications. If VSL Lincoln Sumner LLC holds a public hearing, distributed meeting documents, including meeting minutes, can be translated using available 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 VSL Lincoln Sumner LLC's Title VI Notice to the Public, Discrimination Complaint Form, and Discrimination Complaint Procedures Form have been translated into Spanish for public distribution and for posting on the agency's website.

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 team members. This tool will help the VSL Lincoln Sumner LLC identify language assistance needs as they arise and ensure appropriate support is provided.

Appendix D

VSL Lincoln Sumner LLC 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: VSL Lincoln Sumner LLC

Attn: Olivia Fisher, Senior Accountant

Address: 20220 Harney Street

City, State, ZIP: Elkhorn, NE 68022

Phone: 402-895-3932

Email: ofisher@vhsmail.com

