



Ray Graham  
Association®

*Empowering people with disabilities<sup>SM</sup>*

**RAY GRAHAM ASSOCIATION FOR PEOPLE  
WITH DISABILITIES**

**TITLE VI PROGRAM  
2023**

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Ray Graham  
Association®

*Empowering people with disabilities  
to reach, grow, and achieve.™*

## **Board of Directors**

**FY23**

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## **Title VI Policy for Ray Graham Association**

### **INTRODUCTION**

Title VI of the Civil Rights Act of 1964 states that “no person in the United States shall, on the ground of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under, any program or activity receiving Federal financial assistance. As the recipient of Federal financial assistance, and in accordance with Circular 4702.1B “Title VI Requirements and Guidelines for Federal Transit Administration Recipients”, Ray Graham Association has developed this Title VI Program.

### **NOTIFICATION OF RIGHTS TO THE PUBLIC UNDER TITLE VI**

Ray Graham Association (RGA) operates its programs and provides 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 Ray Graham Association.

For more information on Ray Graham Association's civil rights program and for the procedures to file a complaint, contact 630.620.2222 or visit the administrative office at 901 Warrenville Road, Suite 500, Lisle, IL 60532 or visit [www.raygraham.org](http://www.raygraham.org).

If information is needed in another language, contact 630.620.2222.

Si necesita informacion en otro idioma, contacto 630.620.2222

#### **TITLE VI INSTRUCTIONS TO RGA STAFF MEMBERS AND PEOPLE SUPPORTED BY RGA REGARDING HOW TO FILE A COMPLAINT**

The notice attached as **Exhibit A** provides RGA staff members and people supported by RGA programs with instructions about how to file a Title VI complaint with the organization.

#### **TITLE VI INVESTIGATIONS, COMPLAINTS, OR LAWSUITS SINCE APRIL 2023**

As of April 28, 2023, there are no transit-related Title VI investigations, complaints and/or lawsuits related to Ray Graham Association. The memo attached as **Attachment B** was confirmed by Russ Brondyke, RGA's Director of Human Resources.

#### **PUBLIC PARTICIPATION PLAN**

Potential service recipients (people with disabilities and their family members) learn about RGA via community meetings (often hosted by RGA), DuPage County school districts and other social service agencies. RGA informs the public about all programs including transportation services. RGA uses social media to publicize new program offerings & uses its website to highlight programs and services. RGA works closely with county & state social service agencies in fielding requests for support & assistance to ensure those in need find the services they require, including emergency placements. RGA educates families about new & innovative services offered via one-on-one meetings and program tours to ensure family members are confident their loved one will comfortably transition to the appropriate program. RGA welcomes veterans though few seek developmental disability-related services. Potential service recipients and their family members are offered RGA services without regard to language spoken, race, color or national origin. All potential service recipients are served based on the nature of the disability and the need for services provided by the association.

#### **LANGUAGE ASSISTANCE PLAN FOR LEP PERSONS**

Nearly all recipients of RGA services speak and/or understand English that we have encountered. Adults are referred to RGA through a local PAS (Personal Assistance Services) agency and are already assigned an interpreter, if needed. RGA Team members staff provide interpretation in many languages including Spanish, Polish, Tagalog, Hindi, Gujarati, Marathi, Lithuanian, Yoruba, Calabria, French, Urdu, Otujrati, Greek, Italian, Albanian, Swahili, German, Arabic and American Sign Language. Signs informing people of the right to receive language assistance are posted prominently at RGA sites in Spanish, Polish, Hindi, Tagalog and American Sign Language. The RGA website informs service recipients of the availability of IL Relay Service (7-1-1).

All program materials are created to be understood by the population served and their families. Picture books and/or verbal communication are used for people unable to read. American Sign Language, a Braille typewriter, the Handbook translated into many languages, on-site interpretation or off-site (PAS agency-supplied) interpretation are made available to those seeking services. Notices in many languages are posted conspicuously at RGA sites informing those with limited English proficiency of their right to an interpreter.

A formal Cultural & Linguistic Competency Plan is maintained by the organization. This document is attached as **Exhibit C**.

**RACIAL BREAKDOWN OF RGA NON-ELECTED BOARDS, COUNCILS AND COMMITTEES**

| RGA BODY  | Caucasian | African-American | Asian | Hispanic/Latino |
|---|-----------|------------------|-------|-----------------|
| <b>Advocacy Committee (RGA Council)</b>           | 80%       | 20%              | 0%    | 0%              |
| <b>Board of Directors</b>                         | 86%       | 0%               | 14%   | 0%              |
| <b>Development Committee</b>                      | 92%       | 0%               | 8%    | 0%              |
| <b>Executive/Nominating Committee</b>             | 88%       | 0%               | 12%   | 0%              |
| <b>Finance &amp; Audit Committee</b>              | 86%       | 0%               | 14%   | 0%              |
| <b>Strategic Planning/Public Policy Committee</b> | 74%       | 13%              | 13%   | 0%              |

- As stated in Article VI of the By-Laws of Ray Graham Association:

*Ray Graham Association will seek the participation of racial minorities to serve on its Board of Directors. Outreach activities are undertaken by the nominating committee.*

- As stated in Article VIII of the By-Laws of Ray Graham Association:

*Ray Graham Association encourages the participation of racial minorities on all Association committees. Outreach efforts are undertaken by the Board of Directors and Committee Chairpersons.*

**VOLUNTEER MINORITY TRANSIT-RELATED COMMITTEE:**

Ray Graham Association values feedback from people who use the services we provide as an organization.

The RGA Council is made up of a group of people RGA supports. This group meets to provide their thoughts, ideas and feedback on a variety of issues and concerns, transportation being one of the topics discussed at the monthly meetings.

The Mission Statement of this group is:

To Empower Advocates to be Agents for Positive Change

What they do:

We work together on important issues.

We speak together with one loud voice about services.

We make changes happen where/when it is needed.

We support each other to promote the rights of people with disabilities.

We advocate for choices, competitive employment, better funding and other important issues that affect our lives.

We make a difference in our own lives, our communities, and across our State by working together.

**RAY GRAHAM ASSOCIATION LOCATIONS WHERE TITLE VI NOTICES ARE POSTED:**

Corporate Office  
Suite 500, Warrenville Road  
Lisle, Illinois 60532

Bell Community Learning Center  
2035 E 75<sup>th</sup> Street  
Naperville, Illinois 60565

Elmhurst Community Learning Center  
420 West Madison  
Elmhurst, Illinois 60126

Mize Community Learning Center  
15W431 59th Street  
Burr Ridge, Illinois 60527

Main Street Community Learning Center  
1108 N. Main Street  
Lombard, Illinois 60148

**CERTIFICATION TITLE VI REQUIREMENTS WERE CONSIDERED IN CONSTRUCTION OF QUALIFYING NEW FACILITY**

There have been no facilities constructed, such as a vehicle storage facility or maintenance facility in accordance with the Title VI plan.

**Goals and Timetables**

RGA Recruiting Team will continue to encourage all races, nationalities, genders that reflect the communities we serve at all levels within the organization.

We will do this by recruiting the following ways:

- Employee Referral
- Advertising in the communities we are located in and 25 miles outside these communities
- We will utilize the IDES services
- We will participate in Job Fairs in the communities we are located in and the City of Chicago.

The timetable for these objectives are and will be on a continual basis.



# Ray Graham Association Title VI Complaint Form

Title VI of the Civil Rights Act of 1964 states that “no person in the United States shall, on the ground of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under, any program or activity receiving Federal financial assistance.”

If you feel you have been discriminated against, complete this form and send it to:

Russ Brondyke, Director of Human Resources  
901 Warrenville Road, Suite 500 Lisle, IL 60532

Please **print clearly or type**:

Name: \_\_\_\_\_

Address: \_\_\_\_\_

City, State, Zip: \_\_\_\_\_

Telephone Number: \_\_\_\_\_

Person discriminated against: \_\_\_\_\_

Address of person allegedly discriminated against: \_\_\_\_\_

Please check why you believe discrimination occurred (check all that apply):

race or color                       national origin

other (explain): \_\_\_\_\_

What date did the alleged discrimination occur? \_\_\_\_\_

Where did the alleged discrimination occur? \_\_\_\_\_

Describe the circumstances as you witnessed them: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

List name(s) and contact information of any witnesses: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

What type of corrective action are you requesting? \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Please attach any documents which support this allegation.

Sign and print your name and date the form below. Return the completed form to the person listed on the top of this form.

\_\_\_\_\_

Signature

\_\_\_\_\_

Print your name

\_\_\_\_\_

Date



**Exhibit B**



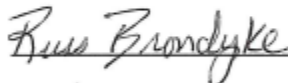
**Memo from Russ Brondyke, Chief People Officer  
Ray Graham Association**

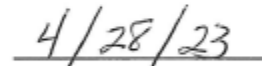
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Date: April 28, 2023

Re: Title VI investigations

There are no open transit-related Title VI investigations, complaints and/or lawsuits related to Ray Graham Association.

  
Signed

  
Date

## Ray Graham Association for People with Disabilities Cultural and Linguistic Competency Plan

Revised 3/28/2022

### **What is Cultural and Linguistic Competency?**

**Cultural competence** is the values and principles toward people of all cultures that are reflected in the attitudes and policies of Ray Graham Association (RGA) that result in the ability to provide appropriate and effective services for all.

**Linguistic competence** is the ability to effectively communicate with all people from a diverse population.

### **Mandates**

**Mandate #1: Organizations should have a linguistic and cultural competence plan for the funded program(s) or the organization as a whole that includes clear goals, outcomes, policies and/or procedures related to the provision of culturally and linguistically appropriate services.**

*RGA includes cultural and linguistic competence in all of its goals, outcomes, policies and/or procedures to assure the provision of appropriate and effective services for the people it supports as well as prospective service recipients and their families members or legal representative. All Team members responsible for setting goals and measuring outcomes for the people who receive supports from RGA assure that such plans include a cultural and linguistically appropriate component and the means for direct support staff to assist the person supported to achieve such goals and outcomes.*

**Responsible parties:** RGA Executive and Senior Staff members

**Mandate #2: Organizations should implement strategies to recruit, retain and promote at all levels, diverse personnel and leadership that are representative of the demographic characteristics of the service area.**

*RGA is an EEOC employer. RGA employees are required to read, write and understand English, however, RGA provides equal employment opportunity for all applicants for employment and Team members regardless of race, color, sex, age, religion, physical or mental handicap or disability, national origin, ancestry, citizenship, sexual orientation, marital status, parental status, military discharge status, status as a Vietnam Era Veteran, source of income or any other protected class established by federal or state law. All RGA employees are encouraged to seek promotion within our organization.*

**Responsible parties:** RGA Director of Human Resources and other staff members involved in the hiring process

**Mandate #3: Organizations should collect customer data to ensure that every effort is made to provide consumers with effective, understandable and respectful services, provided in the consumer's preferred language and in a manner sensitive to cultural beliefs and practices.**

**RGA's Mission:** *"To create opportunities that empower people with disabilities to reach, grow and achieve."* In addition, RGA's Handbook (video) for people supported by the agency addresses person centered planning, protection of individual rights, conflict resolution guidelines and respect for others. All material geared toward the population served is created to be understood by people of all abilities. RGA Team members use picture books or communicate verbally to people who cannot read. RGA employs people who can communicate using American Sign Language. A Braille typewriter is available for creation of materials for the visually impaired. The Handbook, a publication for people who receive supports from RGA, is also available in video form. RGA's annual satisfaction survey for people supported by the agency tracks consumer satisfaction with language access services and organizational sensitivity to consumer culture. The Association's client data base contains information on each person's race, ethnicity and spoken and written language.

**Responsible Parties:** RGA Senior Staff members, supervisors, direct support professional staff

**Mandate #4: Organizations shall provide hearing impaired and language assistance services, including bilingual personnel and interpreter services, at no cost to each consumer with limited English proficiency, or those who are hard of hearing or deaf, at key points of contact, in a timely manner that facilitates maximum access to services.**

*RGA Team members speak many different languages, including Spanish, Polish, Tagalog, Hindi and American Sign Language. Employees are available to provide interpretation services as needed. The Association has identified a professional interpretation service provider with which we can contract as the need arises. People seeking supports from RGA are referred to us by a local PAS (Pre-Admission Screening) agency. Any person coming to RGA thru the PAS agency who has limited English proficiency is provided an interpreter by the PAS agency.*

**Responsible Parties:** RGA Program Directors

**Mandate #5: Organizations shall provide to consumers in their preferred language both verbal and written notices of their right to receive language assistance services that are culturally appropriate.**

*Signs stating "You have the right to language assistance services" and "I speak" cards are posted at key RGA sites including signs posted in Braille.*

**Responsible Parties:** RGA Program Directors

**Board Resolution Adopting Title VI Program**

Whereas, Title VI of the Civil Rights Act of 1964 states that "no person in the United States shall, on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance";


Whereas, the FTA requires Ray Graham Association a subrecipient of Federal public transportation funds, to submit, every three years, a Title VI program update as a condition for receipt of FTA federal assistance;

Whereas, the current approval period for Ray Graham Association ended and a Title VI program update must be submitted to the RTA;

Now, therefore, be it approved by the Board of Directors of Ray Graham Association that:

- 1) The Board of Directors of Ray Graham Association hereby approves the Title VI Plan substantially in the form attached hereto, dated May 5, 2023.
- 2) That Kimberly R. Zoeller, President & CEO of Ray Graham Association, is hereby authorized and directed to take any and all actions as the President & CEO deems necessary and appropriate to implement, administer and enforce this ordinance and the Ray Graham Association Title VI Program, including the preparation and execution of any and all further documents or other materials required for certification.

  
Signature of Authorized Official  
Board Chair  
Title

  
Signature of Attest  
Executive Assistant  
Title



Ray Graham Association has a strong commitment to the community we serve and our employees. As an equal opportunity employer, we strive to have a workforce that reflects the community we serve. No person is unlawfully excluded from employment opportunities based on race, color, religion, national origin, sex (including gender identity, sexual orientation, and pregnancy), age, genetic information, disability, veteran status, or other protected class.

Ray Graham Association Equal Employment Opportunity (EEO) policy applies to all employment actions, including but not limited to, recruitment, hiring, selection for training, promotion, transfer, demotion, layoff, termination, rates of pay or other forms of compensation.

All applicants and employees have the right to file complaints alleging discrimination. Retaliation against an individual who files a charge or complaint of discrimination, participates in an employment discrimination proceeding (such as an investigation or lawsuit), or otherwise engages in protected activity is strictly prohibited and will not be tolerated.

Ray Graham Association is committed to providing reasonable accommodations to applicants and employees who need them because of a disability or to practice or observe their religion, absent undue hardship.

As Ray Graham Association's President/CEO, I maintain overall responsibility and accountability for Ray Graham Association's compliance with its EEO Policy and Program. To ensure day-to-day management, including program preparation, monitoring, and complaint investigation, I have appointed Russ Brondyke, Human Resources Chief People Officer at [rbrondyke@raygraham.org](mailto:rbrondyke@raygraham.org) as Ray Graham's EEO Officer. Russ Brondyke will report directly to me and acts with my authority with all levels of management, labor unions, and employees.

All Ray Graham Association's executives, management, and supervisory personnel, however, share in the responsibility for implementing and monitoring Ray Graham Association's EEO Policy and Program with in their respective areas and will be assigned specific tasks to ensure compliance is achieved. Ray Graham Association will evaluate its managers' and supervisors performance on their successful implementation of Ray Graham Association's policies and procedures, in the same way Ray Graham Association assesses their performance regarding other agency's goals.

Ray Graham Association is committed to undertaking and developing a written nondiscrimination program that sets forth the policies, practices and procedures, with goals and timetables, to which the agency is committed and make the EEO Program available for inspection by any employee or applicant for employment upon request.

I am personally committed to a workplace that acts upon its daily responsibility to treat all applicants and employees with dignity and respect, as well as equitably under the guidelines of our EEO Policy and Program.

  
 \_\_\_\_\_  
 Signature, President/CEO

4/3/23  
 \_\_\_\_\_  
 Date

Kimberly R. Zoeller, President and CEO  
 901 Warrenville Road | Suite 500 | Lisle, IL 60532  
 Phone: 630.620.2222 | Fax: 630.628.2350  
[www.raygraham.org](http://www.raygraham.org)

Providing Quality  
 Service Since  
 1950

