



Title VI Program

Program Owner(s): Facility Services and Compliance Department

Effective Date: January 1, 2013 | **Revised Date:** March 31, 2026

1. Program Objective

The Federal Transit Administration (FTA) requires all recipients of FTA assistance to develop a Title VI Program that will notify the public of its rights under Title VI and outline the procedures by which the public should follow to file a complaint. Compliance is governed by FTA Circular C 4702.1B (Title VI Requirements and Guidelines for FTA Recipients), which remains in effect.

2. Scope

This program applies to all Heartspring employees, students, clients, and their families.

3. Program Statement

It is the policy of Heartspring to:

- Ensure compliance with Title VI of the Civil Rights Act of 1964 (42 U.S.C. §2000d et seq.) in all transit-related programs and activities financed in whole or part with federal funds, so that no person is excluded from participation in, denied the benefits of, or subjected to discrimination on the basis of race, color, or national origin. [\[transportation.gov\]](https://www.transportation.gov)
- Continually assess plans and operations to identify and eliminate discrimination where found to exist.
- Develop and implement policies and procedures to comply with Title VI and FTA C 4702.1B. [\[transit.dot.gov\]](https://www.transit.dot.gov)
- Promptly resolve conditions of inadequacy or non-compliance.

Note: While Title VI covers race, color, and national origin, Heartspring's broader nondiscrimination policy also prohibits discrimination on additional bases under applicable laws and internal policy.

3.1 Notifying the Public of Rights under Title VI

Heartspring 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 he or she has been aggrieved by any unlawful discriminatory practice under Title VI may file a Complaint with

Heartspring or directly with the FTA.

For more information on the Heartspring Civil Rights Program, and the procedures to file a complaint, contact the Compliance Director at 316-634-8950 or email sshelite@heartspring.org or visit our website at www.heartspring.org.

A Complainant may file a complaint directly with the , Federal Transit Administration, Office of Civil Rights, 1200 New Jersey Ave SE, Washington, DC 20590 .

This notice is posted at the main Therapeutic School entrance and the Administration Building entrance at Heartspring. It can also be found on our website at www.heartspring.org. We do not provide services to the general public, thus, we do not have stations or stops where this information can be posted, nor do we post this information in our vehicles.

3.2. Program Areas

Heartspring's transit activities support the residential/day student population and the CARE program by providing transportation only to enrolled students and CARE participants, and assisting staff. All rides originate and terminate on the Heartspring campus; the system does not pick up or drop off in the general community or provide public transit.

3.3 Language Access for Individuals with Limited English Proficiency Plan (LEP)

3.3.1 Governing Standards (2026 Update)

- In 2025, Executive Order 14224 revoked prior federal Executive Order 13166 (2000) that had directed agencies' LEP planning. DOJ subsequently rescinded earlier LEP guidance and signaled a reduction of multilingual services for federal agencies. These federal actions do not repeal Title VI obligations for recipients of federal funding. [\[eelp.law.harvard.edu\]](http://eelp.law.harvard.edu), [\[nilc.org\]](http://nilc.org)
- Heartspring's LEP obligations continue to arise from Title VI and FTA C 4702.1B, which require recipients to provide meaningful access where needed to avoid national origin discrimination. (Private right-of-action doctrines have evolved, but agency enforcement and recipient compliance expectations remain.) [\[congress.gov\]](http://congress.gov), [\[transit.dot.gov\]](http://transit.dot.gov)

3.3.2 Heartspring's Commitment

Heartspring will ensure that language is not a barrier to access where necessary for nondiscriminatory participation in our federally supported transportation activities serving students and assisting staff.

3.4 Four-Factor Analysis

To determine whether and how language assistance should be provided, Heartspring applies a reasonableness framework consistent with Title VI and FTA C 4702.1B. Heartspring reviews:

- the number/proportion of LEP persons likely to interact with our services;
- the frequency of contact with LEP persons;
- the nature and importance of the service; and
- available resources and costs. (This framework is derived from long-standing federal language-access practices under Title VI and remains a reasonable planning tool even as EO-based agency guidance has changed)

Data source: Heartspring's service is closed-campus and non-public. Using 2020 ACS data for Sedgwick County previously reviewed, no language group of individuals who "speak English less than very well" exceeded traditional thresholds often used in planning (e.g., 5%), with Spanish as the largest LEP group at <4% at that time. Heartspring will refresh ACS inputs in the next triennial update or sooner if service characteristics change. *(ACS figures are noted here for context from prior analysis; future updates will incorporate newer ACS releases.)*

3.4.1 Number/Proportion of LEP Individuals Who Can Utilize the Service

- General public: Not applicable; Heartspring transit does not serve the public.
- Board of Directors: Do not use the transit system.
- Staff: Ride only to assist students; Heartspring staff are proficient in English.
- Students: Verbal students are proficient in English; non-verbal students use AAC devices that staff are trained to use.

3.4.2 Frequency of Contact with LEP Individuals

Operational experience indicates no routine interface with LEP individuals in transit operations. Heartspring will monitor and adjust if conditions change.

3.4.3 Importance of the Service to the LEP Community

Because all rides start and end on campus and serve only enrolled students and assisting staff, Heartspring's transit service has no effect on the LEP community within Sedgwick County at large.

3.4.4 Resources and Costs

Heartspring staff can, if needed, use picture-based communication tools similar to those employed with students (e.g., communication books, AAC symbol boards). If warranted, Heartspring may consider qualified interpretation for mission-critical communications linked to nondiscriminatory access under Title VI.

3.5 Limited English Proficiency (LEP) Plan

3.5.1 Identified LEP Individuals

Given the non-public, campus-based nature of the service and current data, no written translations are required at this time to ensure meaningful access. Heartspring will reassess as new data or circumstances arise under Title VI. [\[congress.gov\]](https://www.congress.gov)

3.5.2 Language Assistance Measures

- Utilize AAC/picture-based tools with which staff are already trained.
- If an LEP need arises that is mission-critical to nondiscriminatory access, Heartspring will provide reasonable language assistance (e.g., qualified interpretation for essential safety or access information) consistent with Title VI and proportional to need. [\[congress.gov\]](https://www.congress.gov)

3.5.3 Training Staff

- Continue staff training on students' AAC systems.
- Provide targeted guidance to relevant staff on when and how to access ad hoc language assistance if a Title VI need emerges.

3.5.4 Providing Notice

- Heartspring's Title VI notice and complaint procedures are posted on www.heartspring.org and available on request.
- Point of contact (Title VI & LEP): Compliance Director (see §3.1).
- Individuals wishing to file a complaint should follow the Title VI Complaint Procedures within this program (see §4 Forms/Policies).

3.5.5 Monitoring and Updating the LEP Plan

Heartspring will update the LEP Plan on the Title VI triennial cycle and sooner if there are material changes in service or demographics affecting Title VI obligations. Recent agency programs reaffirm the triennial Title VI update schedule. [\[sfmta.com\]](https://www.sfmta.com), [\[metrocouncil.org\]](https://www.metrocouncil.org)

Committee & Council Membership, Staff and Students– updated February 2026

Body	Caucasian	Hispanic or Latino	African American	Asian American	Native American	Other
Population within service area (Sedgwick County)*	63.8%	15.8%	8.9%	4.3%	1.3%	6.1%
Agency Board of Directors**	89%	0%	11%	0%	0%	0%
Agency Staff**	53.5%	8.25%	26.5%	1.5%	1.25%	3.5%
Heartspring Students**	73.6 %	5.5%	4%	1.39%	1.39%	8%
*Sedgwick Co. numbers are from 2020 Census						
**Agency and Student numbers are from Heartspring records						

3.5.6 Identify the number or proportion of LEP individuals who can utilize the service provided by the Heartspring transit system.

The first population group is the citizens of Sedgwick County, Kansas. At no time does the Heartspring transit system pick up students within Sedgwick County; all rides originate from the Heartspring campus. The second population group is the Heartspring Board of Directors; these individuals do not ride our transit system. The third population is the Heartspring staff; this population rides the transit system only to provide assistance to the students and is 100% proficient in English. The final population is the Heartspring students; those students who are verbal are 100% proficient in English. Non-verbal students use communication devices that the staff assisting them are trained to use.

- **General public:** Not applicable; Heartspring transit does not serve the public.
- **Board of Directors:** Do not use the transit system.
- **Staff:** Ride only to assist students; Heartspring staff are proficient in English and AAC devices.
- **Students:** Verbal students are proficient in English; non-verbal students use AAC devices that staff are trained to use.

3.5.7 Identify the frequency in the LEP individuals who may come into contact with service.

The Heartspring transit system does not interface with any LEP individuals.

3.5.8 Identify the importance of the service to the LEP community.

Because all rides start and end on campus and serve only enrolled students and assisting staff, Heartspring's transit service has no effect on the LEP community within Sedgwick County at large.

3.5.9 Identify the resources available and the respective cost of these resources:

Heartspring staff can, if needed, use picture-based communication tools similar to those employed with students (e.g., communication books, AAC symbol boards). If warranted, Heartspring may consider qualified interpretation for mission-critical communications linked to nondiscriminatory access under Title VI.

3.6 Limited English Proficiency Plan Results

Utilizing the information gathered from the Four Factor Analysis, the following plan has been developed to provide the necessary services to LEP persons.

3.6.1 Identified LEP Individuals

Given the non-public, campus-based nature of the service and current data, no written translations are required at this time to ensure meaningful access. Heartspring will reassess as new data or circumstances arise under Title VI.

3.6.2 Language Assistance Measures

All Heartspring staff who work with our students are trained on how to use the augmentative and alternative communication (AAC) device(s) used by the students. These systems are graphic/picture-based and could be used by our staff to communicate with an LEP individual.

3.6.3 Training Staff

Heartspring staff are trained on the various communication devices our students use. Additional training would be required for staff to use these systems to communicate with an LEP individual.

3.6.4 Providing Notice

- Heartspring’s Title VI notice and complaint procedures are posted on www.heartspring.org and available on request.
- Point of contact (Title VI & LEP): Compliance Director (see §3.1).
- Individuals wishing to file a complaint should follow the Title VI Complaint Procedures within this program (see §4 Forms/Policies).

3.6.5 Title VI Investigations, Complaints, and Lawsuits

Heartspring has not received any Title VI complaints, nor participated in any investigations, or lawsuits since starting the Title VI Program.

3.6.6 Monitoring and Updating LEP Plan

Heartspring will update the LEP Plan on the Title VI triennial cycle and sooner if there are material changes in service or demographics affecting Title VI obligations. Recent agency programs reaffirm the triennial Title VI update schedule.

4. Forms or Related Policies

- [Title VI Complaint Form](#)
- [Title VI Notice to the Public](#)

5. Applicable Laws/Regulations

- CARF Medical Rehabilitation Standard 1.E.1
- [Civil Rights Act of 1964](#)
- [Executive Order 13166](#)
- [Federal Transit Administration C 4702.1B](#)
- Context on 2025 federal actions: EO 14224 rescinded EO 13166 and DOJ rescinded legacy LEP guidance for federal agencies; these actions do not eliminate recipients’ Title VI obligations regarding meaningful access. [\[eelp.law.harvard.edu\]](http://eelp.law.harvard.edu), [\[nilc.org\]](http://nilc.org)

REVISION RECORD

DATE	VERSION	REVISION DESCRIPTION
3/31/2026	v.2	Updated titles, and Section 3 to remove EO 13166; added 2025–2026 federal context; reaffirmed Title VI obligations under FTA C 4702.1B; clarified monitoring, investigation and litigation language & triennial update cycle;