

La Plata County
Public Transit Title VI (Civil Rights) Plan and Procedures
Related to Transportation Services and Transportation Capital
Improvements

2018

Submitted to:
Colorado Department of Transportation
4201 E. Arkansas Ave.
Shumate Building
Denver, CO 80222

La Plata County Senior Services Transportation has been in operation since 2001. In 2007 our agency was approved to be the lead coordinating agency for elderly and disabled in the County by the Southwest Colorado Regional Transportation Planning Commission. We received Federal Transit Agency (FTA) 5310 funds to replace a vehicle with a wheel chair accessible 8 passenger bus in 2007. We have been in good standing and participated in the Southwest Regional Transportation planning meetings and the Statewide Transit Plans since that time. Currently we have two buses and two minivans to transport elderly and adults with disabilities within the La Plata County Senior Services fleet. We were awarded FASTER funds for replacement vehicles for County fiscal years 2015, 2016, and 2017.

I. ANNUAL TITLE VI ASSURANCES

La Plata County Human Services hereby certifies that, as a condition of receiving federal funds for the purpose of coordinating transportation services for the elderly and disabled, La Plata County Human Services and its transportation program division, La Plata County Senior Services, will ensure that La Plata County Senior Services will

1. Submit Title VI assurances as part of any applications/submissions for funding to the FTA or the Colorado Department of Transportation.
2. No person shall be denied service or subjected to any form of discriminatory treatment affecting the level of or quality of transportation services on the basis of race, color, religion, national origin, sexual orientation or gender expression.
3. La Plata County Senior Services will compile, maintain, and submit in a timely manner, Title VI information required by FTA Circular 4702.1A and in compliance with the Department of Transportation's Title VI Regulation, 49 CFR, Part 21.7

4. La Plata County Senior Services will make these policies known to the public that any person or persons alleging discrimination on the basis of race, color, or national origin as it relates to the provision of transportation services and transit-related benefits may file a complaint with the Federal Transit Administration and/or the U.S. Department of Transportation.

II. TITLE VI NOTICE TO THE PUBLIC

La Plata County Senior Services policy

It is the policy of La Plata County Senior Services to notify beneficiaries (seniors or adults with disabilities) who ride transportation provided through La Plata County Senior Services of protections afforded to them under Title VI.

Title VI notice text

Public Notice: La Plata County Senior Services includes the following Statement of Rights in its transit brochures and on its web site:

La Plata County Senior Services Title VI notice to the public is printed on all brochures for transportation services. **See Appendix A.** The text of the notice is:

La Plata County Senior Services Transportation

In accordance with the provisions of the Americans with Disabilities Act and the Civil Rights Act of 1964, La Plata County Senior Services does not discriminate based on disability, race, color, national origin or gender. For more information about these statutes or to file a complaint, contact La Plata County's designated disability rights and Title VI ADA Coordinator, Chuck Stevens, Telephone (970) 382-6220 (voice) or Sarah Jacobson, Assistant ADA Coordinator: Telephone: (970) 382-6210 (voice); 1-800-382-6218 (TDD); (or the Civil Rights Officer, Federal Transit Administration, 12300 W. Dakota Ave., Suite 310, Lakewood, CO 80228, telephone (820) 963-3322. Information in non-English alternative formats may be obtained through the persons listed above. Individuals will be permitted to use service animals as defined by the Americans with Disabilities Act.

La Plata County Senior Services Transporte

De conformidad con lo dispuesto en la Ley de Americanos con Discapacidades y la Ley de Derechos Civiles de 1964, La Plata County Senior Servicios no discrimina por motivos de discapacidad, raza, color, origen nacional o género. Para obtener más información acerca de estos

estatutos o para presentar una queja, contacte derechos de los discapacitados designados de La Plata County y Coordinador del Título VI / ADA, Chuck Stevens, Teléfono (970) 382-6220 (voz); 1-800-382-6218 (TDD); (O al Oficial de Derechos Civil, Administración Federal de Transporte, 12300 W. Dakota Ave., Suite 310, Lakewood, CO 80228, teléfono (820) 963-3322. La información en formatos alternativos no están en inglés se puede obtener a través de las personas mencionadas anteriormente.

III. COMPLAINT PROCEDURES

La Plata County Senior Services Transportation Program advises riders of their Title VI rights in several ways. See “Notification of Protection under Title VI” below.

Members of the general public with a complaint of discrimination may file a complaint using the form included in Appendix C, or by submitting a letter or email. Individuals who call in a complaint by phone or in person are asked to sign a statement or complaint form before an official investigation is initiated. Complaint procedures are posted in each vehicle.

See Appendix C for Complaint Form.

Time limit

A formal complaint must be filed as soon as possible but no later than 60 calendar days from the alleged occurrence of discriminatory treatment.

Content requirement for a complete complaint

A complete, formal complaint must contain, at a minimum, the following information:

1. Name, address and phone number of the person filing complaint
2. Name of the La Plata County Senior Services employees or organization officials who it is alleged acted in a way that discriminated against the person filing the complaint
3. The basis of the complaint. Is the person alleging discrimination based on race, color, national origin, disability or something else.
4. The date of the alleged acts of discrimination
5. A statement detailing the facts and circumstances of the alleged act of discrimination

Submittal

The complaint must be submitted to:

Title VI/ ADA Coordinator
La Plata County Administration
1101 East Second Avenue
Durango, CO 81301 or online at <https://forms.laplata.co.us /Forms/TitleVI>

Persons unable to complete a written complaint statement or form

If the individual making is not able to make a statement in writing or on a form, he or she may make a verbal statement to the Title VI Coordinator, in an interview; the Title VI/ ADA Coordinator will summarize the interview in a written statement.

Acknowledgement of receipt required of agency; notification of missing information

The Title VI /ADA Coordinator must acknowledge receipt of the complaint in writing, via registered mail, within 10 calendar days. If the Title VI /ADA Coordinator finds the complaint is incomplete (missing any of items 1-5 above), such a finding must be included in the notice of written receipt, together with a notification that the complaining party has up to 60 days to provide the missing information. Failure to provide missing information may be considered grounds to determine that there is no basis or merit for further investigation of the alleged incident and the case may be closed.

Determination of jurisdiction and investigation; notification

Within 15 days of receipt of a complete complaint, the Title VI /ADA Coordinator will determine

- If it has jurisdiction in resolving the complaint
- If the complaint merits an investigation

Within 15 calendar days of this decision, the Title VI/ ADA Coordinator will notify the complaining party and the respondent (person against whom the allegation of discrimination was made) in writing of the decision regarding jurisdiction and whether or not the complaint merits an investigation. If the decision is that there will be no investigation, the letter will state the reason for the decision and will provide the complaining party with contact information for the state or federal agency which holds jurisdiction.

If the decision is that there will be an investigation, the letter will

- State the grounds for the determination that La Plata County has jurisdiction over the complaint,
- identify the individual assigned to serve as the investigator (usually the Title VI ADA Coordinator), and
- Inform the parties that their full cooperation will be required to gather additional information to assist the investigator.
- If the response by the Title VI/ ADA Coordinator does not satisfactorily resolve the issue, the complainant may appeal the decision within 15 days after the receipt of the response to the County Manger or his/her designee.

Investigation of complaint

The Title VI/ ADA Coordinator will complete a full investigation and file a complete report to the La Plata County Manager which shall be included in La Plata County's FTA Title VI Civil Rights file no later than 60 days from the receipt of a complete complaint. The contents of the report will include, at a minimum:

1. A narrative description of the incident
2. Summaries of statements by all persons interviewed
3. A finding as to whether or not the incident discriminated against the person filing the complaint.
4. A recommendation for follow up action and any conciliatory measures if appropriate.

If the investigation is delayed for any reason, the Title VI/ ADA Coordinator will notify the complaining party and the La Plata County Manager of the delay with the expected date for completion of the report.

Letter of finding; notification to complainant and respondent

The Title VI ADA /Coordinator will issue a letter of finding (as to whether or not discrimination occurred as alleged) to the complainant and respondent within 90 calendar days of the receipt of the complete complaint.

Appeal to FTA

If the complainant is not satisfied with the decision, he/she has the right to file a complaint with the Federal Transit Administration at the following address:

Federal Transit Administration
Region 8
Attn: Civil Rights Officer
12300 West Dakota Avenue
Suite 310
Lakewood, CO 80228
720-963-3300
Fax 720-963-3333

FTA Complaint procedures can also be found on the FTA web site at: www.fta.dot.gov. These procedures are also outlined in FTA Circular 4702.1A, Chapter IX.

IV. LIST OF PUBLIC-TRANSPORTATION-RELATED TITLE VI INVESTIGATIONS, COMPLAINTS OR LAWSUITS SINCE LAST SUBMISSION

As required by 49 CFR Section 21.9(b) *LA PLATA COUNTY SENIOR SERVICES* shall maintain a list of any complaints of discrimination, lawsuits and investigations by the FTA and any entity other than the FTA. This list includes the date of the investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by the recipient or sub recipient in response to the investigation, lawsuit, or complaint.

Since July 1, 2000, no complaints alleging discrimination on the basis of race, color or national origin have been filed against La Plata County Senior Services in the provision of transportation services. **See Complaint /Investigations table Appendix B.**

V. PUBLIC PARTICIPATION PLAN

La Plata County Senior Services carries out the following steps to solicit input from minority, low income populations at County locations which are accessible to persons with disabilities:

1. Annual Community Assessment, which includes a survey of elderly, family caregivers, key stakeholders and low-income persons, reached through La Plata County Senior Services programs.
2. Participation in the San Juan Basin Area Agency on Aging annual needs assessment and 4 year Plan at each of the Senior Centers in Durango, Bayfield, and Ignacio.
3. Participation in the Regional Advisory Council for San Juan Basin Area Agency on Aging which provides funding for Senior Services Transportation.
4. Participation in the SW Regional Transit Coordinating Council.
5. Biannual rider surveys.
6. On-going relationships with aging and disability advocates and service providers.
7. Participation in county and regional comprehensive transportation planning processes.
8. Transportation to the public meetings is available upon request.
9. Participation of the Public Multimodal meetings for Seniors and persons with disabilities at each of the Senior Centers.
10. Outreach efforts to low-income, minority, or LEP individuals at the low –income housing units are conducted annually.
11. Senior Transportation program and budgets are reviewed at the joint City Council/Board of County Commissioner meetings annually.

La Plata County Senior Services has carried out all these steps during the 12-month period from July 1, 2014 through December 30, 2015.

VI. PROVIDING MEANINGFUL ACCESS TO PERSONS WITH LIMITED ENGLISH PROFICIENCY

La Plata County Human Services has developed a plan to provide meaningful access to persons who are Limited English Proficient. The plan is attached as Appendix B.

VII. ON CONDUCTING AN ANALYSIS OF CONSTRUCTION PROJECTS

Not applicable – No Construction Projects or Facilities have been constructed in the last few years for the Transportation Program.

VIII. PLANNING AND ADVISORY BOARDS

No Transportation Advisory Board is in place at this time for La Plata County Senior Transportation Program.

Coordination with SW Transit Advisory Council and the Multimodal Advisory Program is ongoing. We also coordinate with San Juan Basin Area Agency on Aging where transportation planning and needs are discussed. We encourage participation of low-income, minorities, seniors, and adults with disabilities and facilitate dialogue to assess needs and survey customer satisfaction.

APPENDIX C – Online Form is at <https://forms.laplata.co.us/Forms/TitleVI>



La Plata County Senior Services Title VI Complaint Form

If you have a Civil Rights (Title VI) complaint with La Plata County Senior Services, please fill out this form completely and submit within 60 days of the alleged incident. If you require assistance completing this form, please contact the ADA Coordinator at 970-382-6210 or TDD 970-382-6218 or by email at countyadmin@co.laplata.co.us. If you are a La Plata County employee with an EEO complaint, please use the form provided by Human Resources.

Date

Name *

Mailing Address * Street Address

Address Line 2

City

State / Province / Region

Postal / Zip Code

Country

Phone Number

Email

How would you like to be contacted?
 Email
 Phone
 Mail

Nature of Complaint

Person, Agency or Organization
Who or what agency or organization do you believe discriminated against you (or someone else)?

Date discrimination occurred

Location/position of person(s) if known

**Discrimination
because of:**

- Race
- National origin
- Color

Narrative *

Describe briefly what happened. How and why do you believe that you have been (or someone else has been) discriminated against? Please be as specific as possible. Attach additional documentation if needed. Be sure to include how you feel other persons were treated differently than you.

**Upload additional
information (if
needed).**

Upload

**Why do you believe
these events
occurred?**

**What other
information do you
think is relevant to
the Investigation?**

**How can this/these
issues(s) be
resolved to your
satisfaction?**

Witnesses

Please provide the name, address and phone number of any witnesses, to support and clarify your complaint.

Other Filings

Other filings

Have you filed this complaint with any other federal, state, or local agency, or with any federal or state court?

- Yes
- No

If yes, check all that apply

- Federal agency
- Federal court
- State court
- State agency
- Local agency

Agency/Court

If filed at an agency and/or court, please provide information about a contact person at the agency/court where the complaint was filed, including Contact Name, Address and Phone Number.

Agency/Court

Contact's Name

Address

Phone Number

Signature

Signature *

Please electronically sign the form below.

APPENDIX D

LIMITED ENGLISH PROFICIENCY PLAN

La Plata County

I. INTRODUCTION

This Limited English Proficiency (LEP) Plan, for La Plata County has been developed in response to federal requirements included under Section 601 of Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), which provides that no person 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.”

Federal Executive Order No. 13166, issued in August 2000 by President Clinton, "Improving Access to Services for Persons with Limited English Proficiency," was created to "... improve access to federally conducted and federally assisted programs and activities for persons who, as a result of national origin, are limited in their English proficiency (LEP)..." President Bush affirmed his commitment to Executive Order 13166 through a memorandum issued on October 25, 2001, by Assistant Attorney General for Civil Rights, Ralph F. Boyd, Jr. and Acting Assistant Attorney General, Loretta King directed a strengthening of enforcement of Title VI in a memorandum dated July 10, 2009.

As a sub-recipient of funds from the Federal Transit Administration (FTA), through the Colorado Department of Transportation (CDOT), this Limited English Proficiency (LEP) Plan for La Plata County has been developed to ensure compliance with Federal LEP regulations. It includes an assessment of the limited English proficiency needs of our area, an explanation of the steps we are currently taking to address these needs, and the steps we plan to take in the future to ensure meaningful access to our transit programs by persons with limited English proficiency.

II. LIMITED ENGLISH PROFICIENCY NEEDS OF AREA

The *Four-Factor Analysis* developed by the FTA requires that information be included in LEP Plans regarding the number and percentage of LEP persons in our area, and the nature, frequency and importance of the contact we have, with LEP persons, in providing transit services. Each of these elements is addressed below.

Number and Percentage of LEP Persons in Our Area

Permanent Population

U.S. Census Data

The U.S. Census provides information to assist in estimating the number of limited English speakers. While the 2010 Census will provide up-to-date data, that information is not yet available. For small urban areas and rural counties, the best data available is from the U.S. Census 2010.

Table 1 presents information for La Plata County Senior Services Transportation Program's primary service area (Ignacio, Durango and Bayfield) on *Language Spoken at Home by Ability to Speak English*, based on the year 2010 Census.

As the table shows, the number and percentage of LEP persons in the permanent population of the La Plata County's primary service area is quite small. This is true in spite of the fact that there are significant percentages of Hispanic and Native American residents in the area. Based on these Census data, most of the Hispanic and Native American populations do not have difficulty with English in La Plata County's primary service area.

School District and Other Local Data

School district data indicates the presence of families with limited English-speaking ability (2010 data).

District	English Language Learners	Total Pupil Count	English Language Learners as % of Total
Ignacio	27	763	3.5%
Bayfield	20	1,340	1.5%
Durango	185	4,359	4.2%

This data is consistent with the Census in that the Census reflects a broader age group; school totals include children and therefore would reflect higher concentrations of limited English speakers.

Visitors

While there are many visitors to our service area over the year, La Plata County Senior Transportation service is not oriented to visitor travel. Rather our focus is on nutritional meal sites, medical and social service throughout La Plata County. These are primarily trips for the permanent population of our area which, as reported in U.S. Census data, are made by riders who do not have difficulty with English (more than 97%).

Summary

Based on the information available on the permanent and visitor population of our service area, there are only a very small percentage of persons with Limited English Proficiency in our area.

Nature, Frequency and Importance of LEP Contact

While the nature and importance of LEP contact is important for public transit services in general, as stated above the frequency of contact is with LEP individuals is extremely rare.

III. CURRENT LEP EFFORTS

As stated above, the numbers and percentages of LEP persons in our study area are very small and therefore the nature and frequency of our contact is minimal. However, as a transit service provider we are sensitive to the potential need to service LEP individuals. Therefore, in recent years we have undertaken the following efforts

- Provided phrase books to drivers
- Discussed ways that drivers can direct LEP riders to their destinations using the written schedule

- Used translators in a few cases to help riders understand how to use the system.

IV. PLANS FOR THE FUTURE LEP EFFORTS

Given the current and potential future need to respond to individuals with Limited English proficiency our LEP Plan includes the elements identified below.

Identifying LEP Persons Who Need Language Assistance

In order to identify potential future LEP needs with respect to our transit service we will undertake the following:

- Review Census updates as they become available;
- Periodically review perceived LEP needs with drivers and other first-line staff;
- Make periodic contacts with school districts and other community agencies that may know of LEP persons or groups.

Language Assistance Measures

As the need arises, we will consider the following to respond to LEP needs:

- Obtain copies of Census Bureau's "I Speak Cards" to have on hand if needed;
- Develop Spanish versions of marketing materials, customer complaint forms, public notices, and related information, as appropriate;
- Hire Spanish-speaking customer service staff and/or drivers;
- Obtain copies of CDOT's "Basic Spanish for Transit Employees" and distribute to drivers and customer service staff, as appropriate (already done);
- Become familiar with web-based **AltaVista Babel Fish** for phrase translation into or from multiple languages;
- Become familiar with Language Line Services at <http://www.languageline.com>;
- Identify other community resources such as agencies serving LEP persons which may have resources to share.

Staff Training

Similarly, as the need arises, we will consider the following staff training topics:

- Federal LEP requirements, your LEP Plan and Title VI;
- Documenting language assistance requests;
- Use of any of the language assistance measures as described above.

Outreach Efforts

Similarly, as the need arises, we will consider the following staff training topics:

- Identify agencies in our area that may serve LEP populations
- Provide information on your services to them, as appropriate
- Provide opportunities for LEP participation at public meetings, through advertising and conduct of meetings, as appropriate

Monitoring and Updating Plan

We will monitor and update this plan every 2-3 years, as needed. This will include:

- Reviewing our LEP Plan with staff and make adjustments, as needed
- Pay particular attention to demographic changes in our area and to any LEP-related complaints we receive.

Disseminating Our LEP Plan

- Have copies of our plan available to give to agencies serving LEP populations in our area and or for individual requests;
- Post our plan on your website;
- Provide the plan to organizations who advocate on behalf of limited English speakers and to churches attended by this population.

LEP APPENDIX D

U.S. CENSUS DATA SOURCES

The U.S. Census provides two good sources for estimating the number of limited English speakers by various geographic areas (counties, urban areas, places, etc.). The year 2010 Census has the most complete data in terms of areas covered through the American Fact Finders and . Beginning October 2010 data will be updated annually for all geographic areas.

Year 2010 Census Data

Data from the 2010 Census is available for a variety of geographic areas (counties, urban areas, places, etc.). To access 2010 census data go to the U.S. Census web site at <http://www.census.gov> and follow these steps:

Select "American Factfinder"
Select "La Plata County, CO"
Select "Advanced Search Table P19 and Table P20".

These two tables appear to be most useful, Table P19 and Table P20:

Table P19 is titled "Age by Language Spoken at Home by Ability to Speak English for the Population 5 Years and over." It identifies, by age group and language group, the number of individuals who speak English "very well," "well," "not well" and "not at all" in the geographic area you have selected.

Table P20 is titled "Household Language by Linguistic Isolation" and shows the numbers of households which are "linguistically Isolated" by language group for your area you selected. Households that are "linguistically isolated" are those in which all household members age 14 and over have some difficulty with English.

Census Updates

For more recent estimates (available for cities over 60,000 population) and for 2006-2015 estimates (available for cities over 20,000 population), go to www.census.gov. Then, after going to American FactFinder, select "American Community Survey" as the data set. Then work your way through the choices in the same manner as for the year 2010 data set.

For additional information, contact either: 1) the U.S Census, Information Resources and Dissemination Branch, Data Integration Division, U.S. Census Bureau, 301-763-2422 or toll free 1-866-758-1060 (on ask a question on-line and you will get a response in a day or two), or 2) the Colorado Demographers Office, Colorado Department of Local Affairs, 303 866-2156.

LEP APPENDIX D

QUICK REFERENCE GUIDE



LA PLATA COUNTY DHS

Keep this Quick Reference Guide (QRG) nearby for easy reference to effectively utilize Language LineSM Over-the-phone Interpretation Service.

WHEN RECEIVING A CALL:

1. Use Conference Hold to place the limited English speaker on hold.
2. Dial: **1-866-874-3972**
3. Enter on your telephone keypad or provide the representative:
 - 6-digit Client ID: **5 3 6 2 3 9**
 - Press 1 for Spanish
 - Press 2 for all other languages and speak the name of the language you need at the prompt.
4. An Interpreter will be connected to the call.
Brief the Interpreter. Summarize what you wish to accomplish and give any special instructions.
5. ADD THE limited-ENGLISH SPEAKER to the line.
6. Say "End of Call" to the Interpreter when the call is completed.

NOTE: When placing a call to a limited-English speaker, begin at Step 2. If you need assistance placing a call to a limited-English speaker, please inform the interpreter at the beginning of the call.

IMPORTANT TIPS:

UNKNOWN LANGUAGE – If you do not know which language to request, our representative will help you.

LINE QUALITY PROBLEMS – If you have problems before reaching a representative, press "0" to be transferred. If there is a sound quality problem, ask the representative to stay on the line to check for sound quality. If you have problems connecting to an Interpreter call Customer Service at 1-800-752-6096.

WORKING WITH AN INTERPRETER – Give the Interpreter specific questions to relay. Group your thoughts or questions to help conversation flow quickly.

LENGTH OF CALL – Expect interpreted comments to run a bit longer than English phrases. Interpreters convey meaning-for-meaning, not word-for-word. Concepts familiar to English speakers often require explanation or elaboration in other languages and cultures.

INTERPRETER IDENTIFICATION – Our Interpreters identify themselves by first name and number only. For reasons of confidentiality, they do not divulge either their full names or phone number.

DEMONSTRATION LINE – To hear a recorded demonstration of over-the-phone interpretation call our demonstration line at 1-800-996-8808 or visit our website at www.LanguageLine.com

DOCUMENT TRANSLATION – We also provide written translation services, for more information please contact our Document Translation Department at 1-888-763-3364 or email translation@language.com



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La Plata County Senior Services Transporte

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APPENDIX B

INVESTIGATIONS/COMPLAINTS CHART

Type	Date	Summary (basis)	Status	Action(s) taken
Complaints and Investigations Naming the recipient				
Lawsuits				