

RESOLUTION NO. 10-22-2024

A RESOLUTION OF THE BOARD OF TRUSTEES FOR THE MANGUM CITY HOSPITAL AUTHORITY ADOPTING A TITLE VI PLAN FOR THE MANGUM REGIONAL MEDICAL CENTER AND CONFIRMING THAT THE GOVERNING BODY FOR THE MANGUM REGIONAL MEDICAL CENTER REVIEWED AND APPROVED THE TITLE VI PLAN

Whereas, the Mangum City Hospital Authority is the governing body for the Mangum Regional Medical Center;

Whereas, on August 27, 2024, the Board reviewed a Title VI Plan for the Mangum Regional Medical Center (“the Title VI Plan”), attached to this Resolution as Exhibit A and Incorporated by reference;

Whereas, on August 27, 2024, the Board, upon reviewing the Plan, voted to approve the Title VI Plan;

Be it Resolved, by the Board of Trustees for the Mangum City Hospital Authority:

- § 1. The Title VI Plan attached to this Resolution as Exhibit A has been fully reviewed by the Board of Trustees for the Mangum City Hospital Authority, the governing board for the Mangum Regional Medical Center;
- § 2. The Title VI Plan is fully approved as presented and adopted as the Title VI Plan for the Mangum Regional Medical Center.

Passed, Reviewed, and Approved by the Board of Trustees for the Mangum City Hospital Authority, this 22nd day of October, 2024

Carson VanZant, Board Chair

ATTEST:

Board Secretary

Exhibit A

Mangum Regional Medical Center

Title VI Program

Date filed with ODOT Office of Mobility and Public Transit Programs:

8-21-24

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A. Introduction

MANGUM REGIONAL MEDICAL CENTER agrees to comply with all provisions prohibiting discrimination on the basis of race, color, or national origin of Title VI of the Civil Rights Act of 1964, as amended, 42 U.S.C. 200d *et seq.*, and with U.S. DOT regulations, "Nondiscrimination in Federally-Assisted Programs of the Department of Transportation – Effectuation of Title VI of the Civil Rights Act," 49 CFR part 21.

MANGUM REGIONAL MEDICAL CENTER assures that no person shall, as provided by Federal and State civil rights laws, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity. **MANGUM REGIONAL MEDICAL CENTER** further ensures every effort will be made to ensure non-discrimination in all programs and activities, whether those programs and activities are federally funded or not.

MANGUM REGIONAL MEDICAL CENTER meets the objectives of the FTA Master Agreement, which governs all entities applying for FTA funding, including **MANGUM REGIONAL MEDICAL CENTER** and its third-party contractors, by promoting actions that:

- A. Ensure that the level and quality of transportation service is provided without regard to race, color, or national origin.
- B. Identify and address, as appropriate, disproportionately high and adverse effects of programs and activities on minority populations and low-income populations.
- C. Promote the full and fair participation of all affected Title VI populations in transportation decision-making.
- D. Prevent the denial, reduction, or delay in benefits related to programs and activities that benefit minority populations or low-income populations.
- E. Ensure meaningful access to programs and activities by persons with Limited English Proficiency (LEP).

B. Agency Information

1. Mission of MANGUM REGIONAL MEDICAL CENTER

It's our mission to make a difference every day by delivering compassionate, exceptional healthcare through collaboration and team commitment.

2. History (including year started)

Mangum Regional Medical Center (MRMC) is an 18-bed critical access hospital located in the heart of Mangum, Oklahoma established in 1967. With more than 50 years of tradition and excellence.

3. Regional Profile (regional population; growth projection)

The area served is around 66,000 people. Mangum Regional Medical Center has a highly utilities swing bed program and is implementing a 55+ psychiatric care program called Strong Mind. This program provides mental health services and transportation to participants within a 60-mile radius of Mangum Regional Medical Center.

4. Population served (in relation to regional population)

We provide quality care to patients every day for the communities of Greer, Jackson, Kiowa, Beckham, Harmon, and Washita counties.

5. Service area (include map, with any routes utilized)

Our patients and community benefit from high nurse-to-patient ratios, 24-hour emergency services, in-house laboratory services, connections to higher levels of care when needed, and close-to-home care 365 days a year.

6. Governing body make-up (include terms of office)

Carson VanZant-Chairman of the Board
Cheryl Lively- Vice Chair
Ronnie Webb-Board Member
Lisa Hall- Board Member
Michelle Ford- Board Member

C. Notice to the Public

NOTIFYING the PUBLIC of RIGHTS UNDER TITLE VI MANGUM REGIONAL MEDICAL CENTER

- The Mangum Regional Medical Center operates its programs 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 the Mangum Regional Medical Center.
- For more information on the Mangum Regional Medical Center's civil rights program, and procedures to file a complaint, contact (580) 782-3353 TTY (1-866-874-3972 ID# 221365); email info@mangumregional.org or visit our administrative office at 1 Wickersham Dr., Mangum, Oklahoma, 73554-9117
- A complainant may file a complaint directly with the Oklahoma Department of Transportation by filing a complaint with the Contract Compliance Division, Attention: Contract Compliance Division Manager, 200 NE 21st Street, Oklahoma City, OK 73105-3204.

If information is needed in another language, contact (1-866-874-3972) client ID: 221365.

This Notice can be found:

On the website <https://mangumregional.net/>

In the Strong Mind Vehicle

In the Strong Mind Meeting Room

D. Procedure for Filing a Title VI Complaint

Filing a Title VI Complaint

The complaint procedures apply to the beneficiaries of **MANGUM REGIONAL MEDICAL CENTER**'s programs, activities, and services.

RIGHT TO FILE A COMPLAINT: Any person who believes they have been discriminated against on the basis of race, color, or national origin by **MANGUM REGIONAL MEDICAL CENTER** may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form. Title VI complaints must be received in writing within 180 days of the alleged discriminatory complaint.

HOW TO FILE A COMPLAINT: Information on how to file a Title VI complaint is posted on our agency's website (<https://mangumregional.net/>), and in public areas of our agency.

You may request a copy of the **MANGUM REGIONAL MEDICAL CENTER** Title VI Complaint Form at copy by writing to 1 Wickersham Dr., Mangum, Oklahoma, 73554-9117 or by calling **MANGUM REGIONAL MEDICAL CENTER** at (580) 782-3353.

You may file a signed, dated complaint no more than 180 days from the date of the alleged incident. The complaint should include:

- Your name, address and telephone number.
- Specific, detailed information (how, why, and when) about the alleged act of discrimination.
- Any other relevant information, including the names of any persons, if known, the agency should contact for clarity of the allegations.

Please submit your complaint form to 1 Wickersham Dr., Mangum, Oklahoma, 73554-9117.

COMPLAINT ACCEPTANCE: **MANGUM REGIONAL MEDICAL CENTER** will process complaints that are complete.

Once a completed Title VI Complaint Form is received, **MANGUM REGIONAL MEDICAL CENTER** will review it to determine **whether it** has jurisdiction. The complainant will receive an acknowledgment letter informing them whether or not the complaint will be investigated by **MANGUM REGIONAL MEDICAL CENTER**.

INVESTIGATIONS: **MANGUM REGIONAL MEDICAL CENTER** will generally complete an investigation within 90 days from receipt of a completed complaint form. If more information is needed to resolve the case, **MANGUM REGIONAL MEDICAL CENTER TITLE VI COORDINATOR** may contact the complainant. Unless a longer period is specified by **MANGUM REGIONAL MEDICAL CENTER TITLE VI COORDINATOR**, the complainant will have ten (10) days from the date of the letter to send the requested information to the **MANGUM REGIONAL MEDICAL CENTER** investigator assigned to the case.

If the requested information is not received within that timeframe, the case will be closed. A case can also be administratively closed if the complainant no longer wishes to pursue it.

LETTERS OF CLOSURE OR FINDING: After the Title VI investigator reviews the complaint, the Title VI investigator will issue one of two letters to the complainant: a closure letter or letter of finding (LOF).

- 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 Finding (LOF) summarizes the allegations and provides an explanation of the corrective action taken.

If the complainant disagrees with **MANGUM REGIONAL MEDICAL CENTER**'s determination, the complainant may request reconsideration by submitting the request in writing to the Title VI investigator within seven (7) days after the date of the letter of closure or letter of finding, stating with specificity the basis for the reconsideration.

MANGUM REGIONAL MEDICAL CENTER will notify the complainant of the decision either to accept or reject the request for reconsideration within ten (10) days. In cases where reconsideration is granted, **MANGUM**

REGIONAL MEDICAL CENTER will issue a determination letter to the complainant upon completion of the reconsideration review.

A person may also file a complaint directly with the Federal Transit Administration, at the FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.

If information is needed in another language, contact **MANGUM REGIONAL MEDICAL CENTER DIRECTOR** at 1 Wickersham Dr., Mangum, Oklahoma, 73554-9117 or at (580) 782-3353.

E. Monitoring Title VI Complaints, Investigations, Lawsuits *and* Documenting Evidence of Agency Staff Title VI Training

Documenting Title VI Complaints/Investigations

All Title VI complaints will be entered and tracked in **MANGUM REGIONAL MEDICAL CENTER's** complaint log. Active investigations will be monitored for timely response on the part of all parties. The agency's Title VI Coordinator shall maintain the log.

Agency Title VI Complaint Log

Date complaint filed	Complainant	Basis of complaint R-C-NO	Summary of allegation	Pending status of complaint	Actions taken	Closure Letter (CL)	Letter of Finding (LOF)	Date of CL or LOF

Documenting Evidence of Agency Staff Title VI Training

MANGUM REGIONAL MEDICAL CENTER's staff is given Title VI training, and agency can answer affirmatively to all the following questions:

1. Are new employees made aware of Title VI responsibilities pertaining to their specific duties?
2. Do new employees receive this information via employee orientation?
3. Is Title VI information provided to all employees and program applicants?
4. Is Title VI information prominently displayed in the agency and on any program materials distributed, as necessary?

Public Participation Plan

Goal

The goal of the Public Participation Plan is for all identified audiences to participate significantly and on an ongoing basis in the public participation process for major agency outreach efforts.

Objectives

- To understand the service area demographics and determine what non-English languages and other cultural barriers exist to public participation.
- To provide general notification of meetings and forums for public input in a manner that is understandable to all populations in the area.
- To hold public meetings in locations that are accessible to all area stakeholders, including but not limited to minority and low-income members of the community.
- To provide methods for two-way communication and information and input from populations which are less likely to attend meetings.
- To convey the information in various formats to reach all key stakeholder groups.

Identification of Stakeholders

Stakeholders are those who are either directly or indirectly affected by an outreach effort, system or service plan or recommendations of that plan. Stakeholders include but are not limited to the following:

- Board of Directors – the governing board of the agency. The role of the Board is to establish policy and legislative direction for the agency. The Board defines the agency's mission, establishes goals, and approves the budget to accomplish the goals.
- Advisory Bodies—Non-elected advisory bodies review the agency's current and proposed activities and are encouraged to be active in the agency's public participation process. Advisory bodies provide insight and feedback to the agency.
- Agency Transit riders and clients
- Minority and low-income populations, including limited English proficient persons
- Local jurisdictions and other government stakeholders
- Private businesses and organizations
- Employers
- Partner agencies

Elements of the Public Participation Plan

It is necessary to establish a public participation plan that includes an outreach plan to engage minority and limited English proficient (LEP) populations.

Elements of the Public Engagement Plan include:

1. Public Notice

- a. Official notification of intent to provide opportunity for members of the general public to participate in public engagement plan development, including participation in open Board/council meetings, and advisory committees.

2. Public Engagement Process/Outreach Efforts:

- a. Public meetings
- b. Open houses
- c. Rider forums
- d. Rider outreach
- e. Public hearings
- f. Focus groups
- g. Surveys
- h. Services for the Disabled (Notices of opportunities for public involvement include contact information for people needing these or other special accommodations.)

Events such as public meetings and/or open houses are held at schools, churches, libraries and other non-profit locations easily accessible to public transit and compliant with the Americans with Disabilities Act.

3. Public Comment

- a. Formal public comment periods are used to solicit comments on major public involvement efforts around an agency service or system change.
- b. Comments are accepted through various means:
 - i. Dedicated email address.
 - ii. Website.
 - iii. Regular mail.
 - iv. Forms using survey tool for compilation.
 - v. Videotaping.
 - vi. Phone calls to Customer Service Center [phone]

4. Response to Public Input

All public comments are provided to the Board of Directors prior to decision making. A publicly available summary report is compiled, including all individual comments.

Title VI Outreach Best Practices

MANGUM REGIONAL MEDICAL CENTER ensures all outreach strategies, communications and public involvement efforts comply with Title VI. **MANGUM REGIONAL MEDICAL CENTER's** Public Participation Plan proactively initiates the public involvement process. It makes concerted efforts to involve members of all social, economic, and ethnic groups in the public involvement process. Aligned with the above referenced communication tactics, **MANGUM REGIONAL MEDICAL CENTER** provides the following:

- a. Public notices published in non-English publications (if available).
- b. Title VI non-discrimination notice on agency's website.
- c. Agency communication materials in languages other than English (subject to Safe Harbor parameters).
- d. Services for Limited English Proficient persons. Upon advance notice, translators may be provided.

2024 – 2026 Title VI Program Public Participation Process

MANGUM REGIONAL MEDICAL CENTER will conduct a Public Participation Process for the 2024-2026 Title VI Program. This process includes Community Meetings to seek input, provide education, and highlight key components of the Title VI Plan. Materials have been created to explain Title VI policies as well as provide education on how they relate to minority populations.

MANGUM REGIONAL MEDICAL CENTER will provide briefings to the Board of Directors and Advisory Bodies.

MANGUM REGIONAL MEDICAL CENTER will conduct a 30-day public comment period to provide opportunities for feedback on the 2024-2026 Title VI Program.

Comments are accepted during the public outreach period via:

- a. Email
- b. Mail
- c. Phone
- d. In-person

Summary of 2022-2024 Public Outreach Efforts

We were not involved in the program; therefore, we didn't have any effort.

F. Language Assistance Plan

MANGUM REGIONAL MEDICAL CENTER Limited English Proficiency Plan

This limited English Proficiency (LEP) Plan has been prepared to address MANGUM REGIONAL MEDICAL CENTER's responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964; Federal Transit Administration Circular 4702.1B, dated October 1, 2012, which states that the level and quality of transportation service is provided without regard to race, color, or national origin.

Executive order 13166, titled "Improving Access to Services for Persons with Limited English

Proficiency" indicates that differing treatment based upon a person's inability to speak, read, write, or understand English is a type of national origin discrimination. It directs each federal agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discriminations do not take place. This order applies to all state and local agencies which receive federal funds.

Service Area Description: An approximate 60-mile area of Mangum Regional Medical Center.

MANGUM REGIONAL MEDICAL CENTER has developed this LEP Plan to help identify reasonable steps for providing language assistance to persons with limited English proficiency who wish to access services provided by MANGUM REGIONAL MEDICAL CENTER. As defined in Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write or understand English. This plan outlines how to identify a person who may need language assistance, and the ways in which assistance may be provided.

In order to prepare this plan, MANGUM REGIONAL MEDICAL CENTER undertook the four-factor LEP analysis which considers the following factors:

Four Factor Analysis

1. The number and proportion of LEP persons eligible to be served or likely to be encountered in the service area:

A significant majority of people in the MANGUM REGIONAL MEDICAL CENTER service area are proficient in the English language. Based on 2015 Census data, 5.13% of the population five years of age and older speak English "less than very well" – a definition of limited English proficiency

Population 5 years and over by language spoken at home and ability to speak English	Percentage of Population 5 Years and Older
<u>Population 5 Years and Over</u>	73419
Speak English "less than very well"	3769
<u>Spanish</u>	6946

Speak English "less than very well"	2756
<u>Other Indo-European</u>	337
Speak English "less than very well"	58
<u>Asian and Pacific Island</u>	42
Speak English "less than very well"	7
<u>All Other</u>	734
Speak English "less than very well"	172

2. **Frequency of Contact by LEP Persons with MANGUM REGIONAL MEDICAL CENTER's Services:** We do not currently have a vehicle program, but we do have an LEP program in place for patients.

The **MANGUM REGIONAL MEDICAL CENTER** staff reviewed the frequency with which office staff, dispatchers, and drivers have, or could have, contact with LEP persons. To date, **MANGUM REGIONAL MEDICAL CENTER** has, on average, **only one monthly request** for an interpreter for patients. **MANGUM REGIONAL MEDICAL CENTER** averages **1** phone call per month.

LEP Staff Survey Form

If provided a 5310 Grant, **MANGUM REGIONAL MEDICAL CENTER** will study the language assistance needs of its riders so that we can better communicate with them if needed. The below is currently not applicable.

1. How often do you come into contact with passengers who do not speak English or have trouble understanding you when you speak English to them?

DAILY WEEKLY MONTHLY LESS THAN MONTHLY
2. What languages do these passengers speak?
3. What languages (other than English) do you understand or speak?
4. Would you be willing to serve as a translator when needed?

Frequency of Contact with LEP Persons

Frequency	Language Spoken by LEP Persons
Daily	
Weekly	

Monthly	
Less frequently than monthly	

3. The importance of programs, activities, or services provided by MANGUM REGIONAL MEDICAL CENTER to LEP persons:

Outreach activities, summarized in **MANGUM REGIONAL MEDICAL CENTER's** Title VI Public Engagement Plan, include events such as public meetings and/or open houses held at schools, churches, libraries and other non-profit locations, and include specific outreach to LEP persons to gain understanding of the needs of the LEP population, and the manner (if at all) needs are addressed.

Outside Organization LEP Survey

Organization: _____

1. What language assistance needs are encountered?
2. What languages are spoken by persons with language assistance needs?
3. What language assistance efforts are you undertaking to assist persons with language assistance needs?
4. When necessary, can we use these services?

4. The resources available to MANGUM REGIONAL MEDICAL CENTER and overall cost to provide LEP assistance:

Strategies for Engaging Individuals with Limited English Proficiency include:

1. Language line. Upon advance notice, translators can be provided.
2. Language identification flashcards.
3. Written translations of vital documents (identified via safe harbor provision)
4. One-on-one assistance through outreach efforts.
5. Website information.
6. To the extent feasible, assign bilingual staff for community events, public hearings, and Board of Directors meetings and on the customer service phone lines.

MANGUM REGIONAL MEDICAL CENTER will provide assistance and direction to LEP persons who request assistance.

Staff LEP Training

The following training will be provided to **MANGUM REGIONAL MEDICAL CENTER** staff:

1. Information on **MANGUM REGIONAL MEDICAL CENTER** Title VI Procedures and LEP responsibilities.
2. Description of language assistance services offered to the public.
3. Use of Language Identification Flashcards.
4. Documentation of language assistance requests.

Monitoring and Updating the LEP Plan

The LEP Plan is a component of **MANGUM REGIONAL MEDICAL CENTER**'s Title VI Plan requirement.

MANGUM REGIONAL MEDICAL CENTER will update the LEP plan as required. At minimum, the plan will be reviewed and updated when it is clear that higher concentrations of LEP individuals are present in the **MANGUM REGIONAL MEDICAL CENTER** service area. Updates include the following:

1. How the needs of LEP persons have been addressed.
2. Determine the current LEP population in the service area.
3. Determine as to whether the need for, and/or extent of, translation services has changed.
4. Determine whether local language assistance programs have effectively and sufficiently met the needs.
5. Determine whether **MANGUM REGIONAL MEDICAL CENTER**'s financial resources are sufficient to fund language assistance resources as needed.
6. Determine whether **MANGUM REGIONAL MEDICAL CENTER** has fully complied with the goals of this LEP Plan.
7. Determine whether complaints have been received concerning **MANGUM REGIONAL MEDICAL CENTER**'s failure to meet the needs of LEP individuals.

G. Advisory Bodies

Table Depicting Membership of Committees, Councils, By Race

Committee [examples]	Caucasian	Latino	African American	Asian American		Total
Advisory Committee	100					100%
Chamber of Commerce	95	5				100%

Description of efforts made to encourage minority participation on committees:

- Our CEO, a minority, has been active on committees to try and stimulate other minorities to become more active on committees.

H. Subrecipient Assistance

MANGUM REGIONAL MEDICAL CENTER does not have any subrecipients.

I. Subrecipient Monitoring

MANGUM REGIONAL MEDICAL CENTER does not have any subrecipients.

J. Equity Analysis of Facilities

MANGUM REGIONAL MEDICAL CENTER has not constructed any storage facilities, maintenance facilities, or operations centers in the last three years.

Attachment 1 – Agency Information

Mangum Regional Medical Center is a proud partner of Cohesive Healthcare Management and Consulting. Through our relationship with Cohesive Healthcare, we can provide a level of care we've never been able to. Mangum Regional Medical Center (MRMC) is an 18-bed critical access hospital located in the heart of Mangum, Oklahoma.

Established in 1967. With more than 50 years of tradition and excellence, we provide quality care to patients daily for the communities of Greer, Jackson, Kiowa, Beckham, Harmon, and Washita counties. We offer a wide range of state-of-the-art, high-quality medical services that allow us to improve the health of the community we serve. Our patients and community benefit from high nurse-to-patient ratios, 24-hour emergency services, in-house laboratory services, connections to higher levels of care when needed, and close-to-home care 365 days a year.

The governing board is a Board of Directors consisting of five voting members: Carson VanZant, Chair; Cheryl Lively, Vice Chair; Lisa Hall, Member; Ronnie Webb, Member; and Michelle Ford, Member. They serve four years and are appointed.

Mangum Regional Medical Center is committed to improving transportation services for seniors and individuals with disabilities in our community. We will specifically operate a vehicle for the Strong Mind Program, a mental health initiative for aging adults (over 55) experiencing emotional distress or psychological difficulties. The Strong Mind Program treatment plans are individualized to meet patients' needs. We provide transportation to participants within a 60-mile radius. This ensures all participants who need the care can attend. We plan to provide coordinated care for medical appointments from our Strong Mind Program pickup locations if seats are available.

TITLE VI COMPLAINT FORM

The **Mangum Regional Medical Center** is committed to ensuring that no person is excluded from participation in or denied the benefits of its services on the basis of race, color, or national origin, as provided by the Title VI of the Civil Rights Act of 1964, as amended. The Title VI complaints must be filed within 180 calendar days from the date of the alleged discrimination.

Date of Filing:

Name:

Address:

City, State, Zip Code:

Work Phone:

Home Phone:

E-mail Address:

Mangum Regional Medical Center
Wickersham Dr., Mangum,
Oklahoma, 73554-9117
580-782-3353

Indicate on what ground(s) you believe you have been discriminated against (check all that apply):

Race

Color

National Origin

Indicate the person(s) who you believe discriminated against you:

Name(s):

Work Location (if known):

Work Phone:

Date of alleged incident

If you have an attorney representing you concerning the matters raised in this complaint, please provide the following:

Name:

Address:

Work Phone:

E-mail Address:

Explain why you believe discrimination has occurred. If there are witnesses, please provide names, addresses and telephone numbers. Be sure to include how other persons were treated differently than you. Attach additional pages as necessary and any written material pertaining to your case.

What remedy are you requesting? Please be specific:

Have you filed or do you intend to file a charge or complaint concerning the matters raised in this complaint with any other agencies (Federal, State, or local):

Yes

No

If so, please provide the following information:

Agency:

Address:

Name of Investigator (if known):

Phone Number:

E-mail Address:

Date Filed:

Status of case:

I confirm that I have read the above charge(s) and that they are true to the best of my knowledge.

Print or typed name of complainant:

Signature

Date

Completed forms must be submitted to the Mangum Regional Medical Center. If you require assistance filling out this form, please contact the Mangum Regional Medical Center Title VI Coordinator at (580) 782-3353.

The Mangum Regional Medical Center ensures that no person or groups of persons shall, on the grounds of race, color, sex, religion, national origin, age, disability, retaliation, or genetic information, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any and all programs, services, or activities administered by Mangum Regional Medical Center.

Please contact the Mangum Regional Medical Center ADA Coordinator at 580-782-3353 to request accommodation.