

Title VI Plan and Procedures

Title VI of the Civil Rights Act of 1964

Region Ten Community Services Board



**Adopted date
December 1, 2021**

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I. INTRODUCTION

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides 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." (42 U.S.C. Section 2000d).

The Civil Rights Restoration Act of 1987 clarified the intent of Title VI to include all programs and activities of Federal-aid recipients, sub-recipients, and contractors whether those programs and activities are federally funded or not.

Recently, the Federal Transit Administration (FTA) has placed renewed emphasis on Title VI issues, including providing meaningful access to persons with Limited English Proficiency.

Recipients of public transportation funding from FTA and the Virginia Department of Rail and Public Transportation (DRPT) are required to develop policies, programs, and practices that ensure that federal and state transit dollars are used in a manner that is nondiscriminatory as required under Title VI.

This document details how Region Ten Community Services Board incorporates nondiscrimination policies and practices in providing services to the public. Region Ten's Title VI policies and procedures are documented in this plan and its appendices and attachments. This plan will be updated periodically (at least every three years) to incorporate changes and additional responsibilities that arise.

II. OVERVIEW OF SERVICES

The Region Ten Community Services Board is a public healthcare center located in Charlottesville, Virginia with satellite offices in five surrounding counties, including Albemarle, Louisa, Fluvanna, Greene and Nelson Counties. Region Ten provides behavioral health and developmental service programming to all children, adults and families living in the Planning District 10. Region Ten works in partnership with the Virginia State Department of Behavioral Health and Developmental Services and strives to enhance individual, family, and community functioning. Region Ten served over 9,000 children and adults in FY 2018. Region Ten provides transportation to over 2500 case management, day support and residential consumers on an ongoing basis. Transportation to non-medical related social trips, employment opportunities, recreational activities, medical visits and other spontaneous travel trips for recreation are all provided by our staff.

A. Policy Statement and Authorities

TITLE VI POLICY STATEMENT

Region Ten is committed to ensuring that no person shall, on the grounds of race, color, national origin, as provided by Title VI of the Civil Rights Act of 1964 and the Civil Rights Restoration Act of 1987 (PL 100.259), be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity, whether those programs and activities are federally funded or not.

Region Ten Title VI Manager is responsible for initiating and monitoring Title VI activities, preparing required reports, and other responsibilities as required by Title 23 Code of Federal Regulations (CFR) Part 200, and Title 49 CFR Part 21.



Xavia L. Jackson,
Director of Compliance and Information Technology

December 1, 2021

Date

B. Authorities

Title VI of the 1964 Civil Rights Act provides 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 otherwise subjected to discrimination under any program or activity receiving federal financial assistance (refer to 49 CFR Part 21). The Civil Rights Restoration Act of 1987 broadened the scope of Title VI coverage by expanding the definition of the terms “programs or activities” to include all programs or activities of Federal Aid recipients, sub recipients, and contractors, whether such programs and activities are federally assisted or not.

Additional authorities and citations include: Title VI of the Civil Rights Act of 1964 (42 U.S.C. Section 2000d); Federal Transit Laws, as amended (49 U.S.C. Chapter 53 et seq.); Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 U.S.C. 4601, et seq.); Department of Justice regulation, 28 CFR part 42, Subpart F, “Coordination of Enforcement of Nondiscrimination in Federally-Assisted Programs” (December 1, 1976, unless otherwise noted); U.S. DOT regulation, 49 CFR part 21, “Nondiscrimination in Federally-Assisted Programs of the Department of Transportation—Effectuation of Title VI of the Civil Rights Act of 1964” (June 18, 1970, unless otherwise noted); Joint FTA/Federal Highway Administration (FHWA) regulation, 23 CFR part 771, “Environmental Impact and Related Procedures” (August 28, 1987); Joint FTA/FHWA regulation, 23 CFR part 450 and 49 CFR part 613, “Planning Assistance and Standards,” (October 28, 1993, unless otherwise noted); U.S. DOT Order 5610.2, “U.S. DOT Order on Environmental Justice to Address Environmental Justice in Minority Populations and Low-Income Populations,” (April 15, 1997); U.S. DOT Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient Persons, (December 14, 2005), and Section 12 of FTA’s Master Agreement, FTA MA 13 (October 1, 2006).

III. NONDISCRIMINATION ASSURANCE TO DRPT

In accordance with 49 CFR Section 21.7(a), every application for financial assistance from the Federal Transit Administration (FTA) must be accompanied by an assurance that the applicant will carry out the program in compliance with DOT's Title VI regulations. This requirement is fulfilled when the Virginia Department of Rail and Public Transportation (DRPT) submits its annual certifications and assurances to FTA. DRPT shall collect Title VI assurances from sub-recipients prior to passing through FTA funds.

As part of the Certifications and Assurances submitted to DRPT with the Annual Grant Application and all Federal Transit Administration grants submitted to the DRPT, Region Ten submits a Nondiscrimination Assurance which addresses compliance with Title VI as well as nondiscrimination in hiring (EEO) and contracting (DBE), and nondiscrimination on the basis of disability (ADA).

In signing and submitting this assurance, Region Ten confirms to DRPT the agency's commitment to nondiscrimination and compliance with federal and state requirements.

A. Plan Approval Document

I. Plan Approval Document

I hereby acknowledge the receipt of the Region Ten Title VI Implementation Plan 2022-2024. I have reviewed and approve the Plan. I am committed to ensuring that no person is excluded from participation in, or denied the benefits of transit services on the basis of race, color, or national origin, as protected by Title VI according to Federal Transit Administration (FTA) Circular 4702.1B Title VI requirements and guidelines for FTA sub-recipients.

DocuSigned by:

535B416C80204CD...

Lisa Beitz, DSW, LCSW
Executive Director
Region Ten Community Services Board

12/1/2021

Date

**Region Ten Community Services Board
Board Member Meeting**

regionten

innovative services for mental health, developmental
disabilities and substance use disorders

a better life, a better community

Memorandum

To: Department of Public Transportation and Rail
From: Lisa Beitz
Date: December 1, 2021
RE: Board of Directors Approval

Region Ten Board of Directors and Leadership Team adopted the previous Title VI Plan in 2019. The information provided in the 2021 Title VI Plan has been adjusted to reflect the changes we have made to our process.

We will be presenting our 2021 Title VI plan to the Board during our next meeting on December 13, 2021. The meeting minutes and approval will be added to the Title VI plan as a supplement.

Thank you,

DocuSigned by:

5355418C80204CD
Lisa Beitz, DSW, LCSW
Executive Director

B. Organization and Title VI Program Responsibilities

Region Ten's Compliance Director is the Title VI Manager responsible for ensuring implementation of the agency's Title VI program. Title VI program elements are interrelated and responsibilities may overlap. The specific areas of responsibility have been delineated below for purposes of clarity.

Overall Organization for Title VI

The Title VI Manager is responsible for coordinating the overall administration of the Title VI program, plan, and assurances, including complaint handling, data collection and reporting, annual review and updates, and internal education.

Detailed Responsibilities of the Title VI Manager

The Title VI Manager is charged with the responsibility for implementing, monitoring, and ensuring compliance with Title VI regulations. Title VI responsibilities are as follows:

1. Process the disposition of Title VI complaints received.
2. Collect statistical data (race, color or national origin) of participants in and beneficiaries of agency programs, (e.g., affected citizens, and impacted communities).
3. Conduct annual Title VI reviews of agency to determine the effectiveness of program activities at all levels.
4. Conduct Title VI reviews of construction contractors, consultant contractors, suppliers, and other recipients of federal-aid fund contracts administered through the agency.
5. Conduct training programs on Title VI and other related statutes for agency employees.
6. Prepare a yearly report of Title VI accomplishments and goals, as required.
7. Develop Title VI information for dissemination to the general public and, where appropriate, in languages other than English.
8. Identify and eliminate discrimination.
9. Establish procedures for promptly resolving deficiency status and writing the remedial action necessary, all within a period not to exceed 90 days.

C. General Title VI Responsibilities of The Agency

The Title VI Manager is responsible for substantiating that these elements of the plan are appropriately implemented and maintained, and for coordinating with those responsible for public outreach and involvement and service planning and delivery.

1. Data collection

To ensure that Title VI reporting requirements are met, Region Ten will maintain:

- A database or log of Title VI complaints received. The investigation of and response to each complaint is tracked within the database or log.
- A log of the public outreach and involvement activities undertaken to ensure that minority and low-income people had a meaningful access to these activities.

2. Annual Report and Updates

As a sub-recipient of FTA funds, Region Ten is required to submit a Quarterly Report Form to DRPT that documents any Title VI complaints received during the preceding quarter and for each year. Region Ten will also maintain and provide to DRPT on an annual basis, the log of public outreach and involvement activities undertaken to ensure that minority and low-income people had a meaningful access to these activities.

Further, we will submit to DRPT updates to any of the following items since the previous submission, or a statement to the effect that these items have not been changed since the previous submission, indicating date:

- A copy of any compliance review report for reviews conducted in the last three years, along with the purpose or reason for the review, the name of the organization that performed the review, a summary of findings and recommendations, and a report on the status or disposition of the findings and recommendations
- Limited English Proficiency (LEP) plan
- procedures for tracking and investigating Title VI complaints
- A list of Title VI investigations, complaints or lawsuits filed with the agency since the last submission
- A copy of the agency notice to the public that it complies with Title VI and instructions on how to file a discrimination complaint

3. Annual review of Title VI program

Each year, in preparing for the Annual Report and Updates, the Title VI Manager will review the agency's Title VI program to assure implementation of the Title VI plan. In addition, they will review agency operational guidelines and publications, including those for contractors, to verify that Title VI language and provisions are incorporated, as appropriate.

4. Dissemination of information related to the Title VI program

Information on our Title VI program will be disseminated to agency employees, contractors, and beneficiaries, as well as to the public, as described in the "public outreach and involvement" section of this document, and in other languages when needed according to the LEP plan as well as federal and State laws/regulations.

5. Resolution of complaints

Any individual may exercise his or her right to file a complaint if that person believes that he, she or any other program beneficiaries have been subjected to unequal treatment or discrimination in the receipt of benefits/services or prohibited by non-discrimination requirements. Region Ten will report the complaint to DRPT within three business days (per DRPT requirements), and make a concerted effort to resolve complaints locally, using the agency's Title VI Complaint Procedures. All Title VI complaints and their resolution will be logged as described under Section 1. Data collection and reported annually (in addition to immediately) to DRPT.

6. Written policies and procedures

Our Title VI policies and procedures are updated periodically to incorporate changes and additional responsibilities that arise. During the course of the Annual Title VI Program Review (item 3 above), the Title VI Manager will determine whether or not an update is needed.

7. Internal education

Our employees will receive training on Title VI policies and procedures upon hiring and upon promotion. This training will include requirements of Title VI, our obligations under Title VI (LEP requirements included), and required data that must be gathered and maintained. In addition, training will be provided when any Title VI-related policies or procedures change (agency-wide training), or when appropriate in resolving a complaint.

Title VI training is the responsibility of the Training Department as outlined by the Title VI manager.

8. Title VI clauses in contracts

In all federal procurements requiring a written contract or Purchase Order (PO), Region Ten's contract/PO will include appropriate non-discrimination clauses. The Title VI Manager will work

with the Fiscal Analyst who is/are responsible for procurement contracts and PO's to ensure appropriate non-discrimination clauses are included.

D. Procedures for Notifying the Public Of Title VI Rights and How To File A Complaint

Requirement to Provide a Title VI Public Notice

Title 49 CFR Section 21.9(d) requires recipients to provide information to the public regarding the recipient's obligations under DOT's Title VI regulations and apprise members of the public of the protections against discrimination afforded to them by Title VI. At a minimum, Region Ten Community Services Board shall disseminate this information to the public by posting a Title VI notice on the agency's website and in public areas of the agency's office(s), including the reception desk, meeting rooms, in federally-funded vehicles, etc. See appendix A.

SEE APPENDIX A-Title VI Notice to the Public
SEE APPENDIX B-Title VI Notice to the Public List of Locations

IV. TITLE VI COMPLAINT PROCEDURES

Requirement to Develop Title VI Complaint Procedures and Complaint Form.

In order to comply with the reporting requirements established in 49 CFR Section 21.9(b), all recipients shall develop procedures for investigating and tracking Title VI complaints filed against them and make their procedures for filing a complaint available to members of the public. Recipients must also develop a Title VI complaint form. The form and procedure for filing a complaint shall be available on the recipient's website and at their facilities.

Any individual may exercise his or her right to file a complaint with Region Ten if that person believes that he or she has been subjected to unequal treatment or discrimination in the receipt of benefits or services. We will report the complaint to DRPT within three business days (per DRPT requirements), and make a concerted effort to resolve complaints locally, using the agency's Nondiscrimination Complaint Procedures. All Title VI complaints and their resolution will be logged and reported annually (in addition to immediately) to DRPT.

Region Ten includes the following language on all printed information materials, on the agency's website, in press releases, in public notices, in published documents, and on posters on the interior of each vehicle operated in passenger service:

The Region Ten is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services on the basis of race, color or national origin, as protected by Title VI of the Civil Rights Act of 1964.

For additional information on Region Ten's nondiscrimination policies and procedures, or to file a complaint, please visit the website at regionten.org or contact Title VI Manager, 500 Old Lynchburg Road, Charlottesville, VA 22903.

Instructions for filing Title VI complaints are posted on the agency's website and in posters on the interior of each vehicle operated in passenger service and agency's facilities, and are also available from any member of the agency's support staff or a vehicle operator.

SEE APPENDIX C-Title VI Complaint Form

PROCEDURES FOR HANDLING AND REPORTING INVESTIGATIONS/COMPLAINTS AND LAWSUITS

Should any Title VI investigation be initiated by FTA, DRPT, or any title VI lawsuits are filed against Region Ten Community Services Board the agency will follow these procedures.

Procedures

1. Any individual, group of individuals, or entity that believes they have been subjected to discrimination on the basis of race, color, or national origin may file a written complaint with the Title VI Manager. The complaint is to be filed in the following manner:
 - a. A formal complaint must be filed within 180 calendar days of the alleged occurrence.
 - b. The complaint shall be in writing and signed by the complainant(s).
 - c. The complaint should include:
 - the complainant's name, address, and contact information
 - date(s) of the alleged act of discrimination (if multiple days, include the date when the complainant(s) became aware of the alleged discrimination and the date on which the alleged discrimination was discontinued or the latest instance).
 - a description of the alleged act of discrimination
 - the location(s) of the alleged act of discrimination (include vehicle number if appropriate)
 - an explanation of why the complainant believes the act to have been discriminatory on the basis of race, color, and national origin
 - if known, the names and/or job titles of those individuals perceived as parties in the incident
 - contact information for any witnesses
 - indication of any related complaint activity (i.e., was the complaint also submitted to DRPT or FTA?)
 - d. The complaint shall be submitted to the Compliance Director at 500 Old Lynchburg Rd. Charlottesville, VA 22903.
 - e. Complaints received by any employee of Region Ten Community Services Board will be immediately forwarded to the Compliance Director.
 - f. In the case where a complainant is unable or incapable of providing a written statement, a verbal complaint of discrimination may be made to the Title VI Manager. Under these circumstances, the complainant will be interviewed, and the Title VI Manager will assist the complainant in converting the verbal allegations to writing.

2. Upon receipt of the complaint, the Compliance Director will immediately:
 - a. notify DRPT (no later than 3 business days from receipt)
 - b. notify the Region Ten Authorizing Official
 - c. ensure that the complaint is entered in the complaint database
3. Within 3 business days of receipt of the complaint, the Compliance Director will contact the complainant by telephone to set up an interview.
4. The complainant will be informed that they have a right to have a witness or representative present during the interview and can submit any documentation he/she perceives as relevant to proving his/her complaint.
5. If DRPT has assigned staff to assist with the investigation, the Title VI Manager will offer an opportunity to participate in the interview.
6. The alleged discriminatory service or program official will be given the opportunity to respond to all aspects of the complainant's allegations.
7. The Title VI Manager will determine, based on relevancy or duplication of evidence, which witnesses will be contacted and questioned.
8. The investigation may also include:
 - a. investigating contractor operating records, policies or procedures
 - b. reviewing routes, schedules, and fare policies
 - c. reviewing operating policies and procedures
 - d. reviewing scheduling and dispatch records
 - e. observing behavior of the individual whose actions were cited in the complaint
9. All steps taken and findings in the investigation will be documented in writing and included in the complaint file.
10. The Title VI Manager will contact the complainant at the conclusion of the investigation, but prior to writing the final report, and give the complainant an opportunity to give a rebuttal statement at the end of the investigation process.
11. At the conclusion of the investigation and within 60 days of the interview with the complainant, the Title VI Manager will prepare a report that includes a narrative description of the incident, identification of persons interviewed, findings, and recommendations for disposition. This report will be provided to the Authorizing Official, DRPT, and, if appropriate, Region Ten Community Services Board's legal counsel.
12. The Title VI Manager will send a letter to the complainant notifying them of the outcome of the investigation. If the complaint was substantiated, the letter will indicate the course of action that will be followed to correct the situation. If the complaint is determined to be unfounded, the letter will explain the reasoning, and refer the complainant to DRPT in the event the complainant wishes to appeal the determination. This letter will be copied to DRPT.
13. A complaint may be dismissed for the following reasons:

- a. The complainant requests the withdrawal of the complaint.
 - b. An interview cannot be scheduled with the complainant after reasonable attempts.
 - c. The complainant fails to respond to repeated requests for additional information needed to process the complaint.
14. DRPT will serve as the appealing forum to a complainant that is not satisfied with the outcome of an investigation conducted by Region Ten Community Services Board. DRPT will analyze the facts of the case and will issue its conclusion to the appellant according to their procedures.

A person may also file a complaint directly with the Federal Transit Administration, Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor – TCR, 1200 New Jersey Avenue SE, Washington, DC 20590.

Transportation-Related Title VI Investigations, Complaints, and Lawsuits

Background

All recipients shall prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, or national origin:

- Active investigations conducted by FTA and entities other than FTA;
- Lawsuits; and
- Complaints naming the recipient.

This list shall include the date that the transportation-related Title VI 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 in response, or final findings related to the investigation, lawsuit, or complaint. This list shall be included in the Title VI Program submitted to DRPT every three years and information shall be provided to DRPT quarterly and annually. See Appendix D.

SEE APPENDIX D – Investigations, Lawsuits, and Complaints Document

A. Public Outreach and Involvement

Region Ten participates in the Thomas Jefferson Planning District Metropolitan Planning Organization. The MPO is responsible for carrying out continuing, cooperative and comprehensive transportation planning and programming process. The MPO coordinates the transportation planning activities of the various transportation-related agencies that have both a direct and indirect impact on the Long-Range Plan and Transportation Improvement Program.



Reviewed by: _____

Date: December 1, 2021

B. Language Assistance Plan for Persons with Limited English Proficiency (LEP)

Introduction and Legal Basis

LEP is a term that defines any individual not proficient in the use of the English language. The establishment and operation of an LEP program meets objectives set forth in Title VI of the Civil Rights Act and Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency (LEP). This Executive Order requires federal agencies receiving financial assistance to address the needs of non-English speaking persons. The Executive Order also establishes compliance standards to ensure that the programs and activities that are provided by a transportation provider in English are accessible to LEP communities. This includes providing meaningful access to individuals who are limited in their use of English. The following LEP language implementation plan, developed by Region Ten is based on FTA guidelines.

As required, Region Ten developed a written LEP Plan (below). Using 2019 American Community Survey (ACS) Census data, Region Ten has evaluated data to determine the extent of need for translation services of its vital documents and materials.

LEP persons can be a significant market for public transit, and reaching out to these individuals can help increase their utilization of transit. Therefore, it also makes good business sense to translate vital information into languages that the larger LEP populations in the community can understand.

Assessment of Needs and Resources

The need and resources for LEP language assistance were determined through a four-factor analysis as recommended by FTA guidance.

Factor 1: Assessment of the Number and Proportion of LEP Persons Likely to be Served or Encountered in the Eligible Service Population

The agency has reviewed census data on the number of individuals in its service area that have limited English Proficiency, as well as the languages they speak.

U.S. Census Data – American Community Survey (2019)

Data from the U.S. Census Bureau's American Community Survey (ACS) were obtained through www.census.gov by Region Ten's service area. The agency's service area includes a total of **7,940 or 3.3%** persons with Limited English Proficiency (those persons who indicated that they spoke English "less than very well," in the 2019 ACS Census).

Information from the 2019 ACS also provides more detail on the specific languages that are spoken by those who report that they speak English less than very well. Languages spoken at home by those with LEP are presented below. These data indicate the extent to which translations into other language are needed to meet the needs of LEP persons.

Total Population 5 years and over = 238,371

Language	Number of individuals speaking a language other than English	Number of individuals speaking English less than very well	% of LEP
Spanish	9396	3712	3.9%
Indo-European	7171	1626	3.0%
Asian and Pacific Islander	5293	1812	2.2%
Other Languages	1918	790	0.8%

It is noted that there are relatively low number of LEP persons in the service area - no language is spoken by over 5%.

Factor 2: Assessment of Frequency with Which LEP Individuals Come Into Contact with the Transit Services or System

Region Ten reviewed the relevant benefits, services, and information provided by the agency and determined the extent to which LEP persons have come into contact with these functions through the following channels:

- Contact with transit vehicle operators;
- Calls to Region Ten's customer service telephone line;
- Visits to the agency's headquarters;
- Access to the agency's website;
- Attendance at community meetings or public hearings hosted by Region Ten;
- Contact with the agency's ADA complementary paratransit system (including applying for eligibility, making reservations, and communicating with drivers).

During the fiscal year ending June 30,2021, Colonial Behavioral Health provided services to 87 of (5,523) whose primary language was not English.

Primary Language	Number of Individuals	%
American Sign Language	3	0.1%
Arabic	3	0.0%
Chinese	4	0.1%
Farsi/Persian/Dari	21	0.3%
Hindi	1	0.0%
Spanish	37	0.1%
Other	18	0.2%

We will continue to identify emerging populations as updated Census and American Community Survey data become available for our service area. In addition, when LEP persons contact our agency, we attempt to identify their language and keep records on contacts to accurately assess the frequency of contact. To assist in language identification, we use a language identification flashcard based on that which was developed by the U.S. Census. (<http://www.lep.gov/ISpeakCards2004.pdf>)]

Factor 3: Assessment of the Nature and Importance of the Transit Services to the LEP Population

Region Ten provides the following programs, activities and services:

- **Case Management:** Helps individuals by accessing supports and services critical to meeting basic needs, improving quality of life and promoting self-empowerment.
- **Developmental Disability Day services**
 - **Community engagement:** fosters an individual's ability to acquire, retain or improve skills necessary to building positive social behavior, interpersonal competence, greater independence, employability, and personal choice. This program enables the individual to access typical activities in community life enjoyed by the general population such as education o training, retirement, and volunteer activities. This program provided l groups with no more than a 1:3 staff to individual ratio.
 - **Group day services:** Provides opportunities for peer interactions, community integration, career planning and enhancement of social networks. Supports may be provided to ensure individual health and safety. These services are provided in groups with no more than 1:7 staff to individual ratio.
- **Developmental Disability Residential Services:** Assists individuals with living independently in the community to the greatest extent possible. Based on individual need, instructional activities and staff support are provided to help individuals improve the quality of their daily lives, and promote self-determination, wellness, and community integration.

- **Emergency Services:** Designed to address urgent or severe behavioral health crises in a variety of settings 24 hours a day, seven days a week.
- **Assertive community Treatment:** An organized service that provides multidisciplinary team treatment following a planned, structured regimen. This is a mobile service delivered in community locations that are comfortable and convenient for individuals served; these services enable individuals to identify and live in their own residence and find and maintain work in the community.
- **Psychosocial Rehabilitation:** A recovery-based program provided for two or more hours per day. The program offers structured day support services including community integration, independent living skills instruction, interpersonal and social skills development, and communication skills instruction.

Based on past experience serving and communicating with LEP personas and interviews with community agencies, we learned that no services particularly served LEP persons in the community. Transportation is provided as part of service delivery and accommodations are made for LEP persons on an as-needed basis.

The following are the most critical services provided by Region Ten for all customers, including LEP persons.

- Safety and security awareness instructions
- Emergency evacuation procedures
- Public transit services, including reduced fare application process
- ADA paratransit services (if your agency operates fixed-route), including eligibility certification process
- Other paratransit services
- Services targeted at low income persons

Factor 4: Assessment of the Resources Available to the Agency and Costs

Costs

The following language assistance measures currently being provided by Region Ten:

Jeenie through Credible

- Video interpretation services provider: Multi-language interpretation available 24 hours a day, seven days a week.
 - Cost is accrued by usage.
 - \$250.00 set up fee
 - For all languages the cost is \$1.00 per minute

- Languages included:

- | | | |
|-------------|--------------|--------------|
| ○ Cantonese | ○ Korean | ○ Haitian |
| ○ French | ○ Mandarin | ○ Creole |
| ○ German | ○ Portuguese | ○ Italian |
| ○ Italian | ○ Arabic | ○ Russian |
| ○ Japanese | ○ Amharic | ○ Vietnamese |

- Virtual American Sign Language provider available 24 hours a day seven days a week.

- Cost is accrued by usage.
- \$250.00 set up fee
- Cost is \$1.50 per minute

Propio

- Telephone interpretation services provider: Multi-language interpretation available 24 hours per day.

- Telephone interpretation services \$0.58
- Video conference interpretation Spanish \$0.99
- Video Conference for all other languages \$1.09
- Document Translation to Spanish \$0.12 per word
- Document Translation to all other languages \$0.23 per word
- American Sign Language \$79.00 per hour on site
- American Sign Language Video flat rate \$169
- Spanish interpretation in person \$69.00 per hour
- In person all other languages \$69.00 per hour
- Onsite mileage rate consistent with IRS current rate.
- Languages offered:

- | | | |
|--------------|-----------------|------------------|
| ○ Amharic | ○ Greek | ○ Bangla |
| ○ Chinese – | ○ Italian | ○ Bulgarian |
| ○ Cantonese | ○ Korean | ○ Dinka |
| ○ French | ○ Punjabi | ○ Indonesian |
| ○ Gujarathi | ○ Spanish | ○ Krio |
| ○ Japanese | ○ Urdu | ○ Maay Maay |
| ○ Polish | ○ Persian | ○ Serbo-Croatian |
| ○ Russian | ○ Acholi | ○ Telegu |
| ○ Tagalog | ○ Bantu | ○ Tigrinya |
| ○ Vietnamese | ○ Burmese | ○ Ukrainian |
| ○ Arabic | ○ French Creole | ○ Haitian |
| ○ Chinese – | ○ Kirundi | ○ Karenni |
| ○ Mandarin | ○ Mongolian | ○ Turkish |
| ○ German | ○ Swahili | ○ Wolof |
| ○ Hindi | ○ Albanian | ○ Pashto |
| ○ Khmer | ○ Bosnian | ○ Twi |
| ○ Portuguese | ○ Dari | ○ Tedim |
| ○ Somali | ○ Hmong | ○ Karen |
| ○ Thi | ○ Krahn | |
| ○ Cambodian | ○ Lao | |
| ○ Bengali | ○ Nepali | |
| ○ Farsi | ○ Tamil | |

Based on the analysis of demographic data and contact with community organizations and LEP persons, Region Ten has determined that no additional services are needed at this time to provide meaningful access.

Resources

Region Ten Community Services board allocates resources toward language assistance expenses as available and appropriate. The agency does not have a set budget for translation services.

Feasible and Appropriate Language Assistance Measures

Based on the available resources, the following language assistance measures are feasible and appropriate for our agency at this time:

- Offer timely availability of interpretation.
- Contract with interpretation services, independent interpreters, or volunteer interpreters who satisfy competency requirements
- Offer both in person and telephone interpretation services
- Provide written materials to individuals and the public in English and those languages regularly encountered by Region Ten
- Develop, maintain, and post notices in key locations of the organization notifying persons of their right to free language assistance.
- Utilize identification cards ("I speak" cards) which assists LEP persons in identifying their language needs.
- Document the language of individuals when they initially request services.
- Implement procedures for staff for purposes of accessing in-person and telephone interpretation.
- Refrain from requesting, encouraging, or requiring LEP or hearing-impaired person to use friends family, or minor children as interpreters.

LEP Implementation Plan

Through the four-factor analysis, Region Ten has determined that no additional types of language assistance are needed at this time. The following details current agency procedures.

Staff Access to Language Assistance Services

Agency staff who come into contact with LEP persons can access language services by calling the contract translation services. All staff will be provided with information about the contracted

language assistance service via the orientation, team meetings, and the organization's SharePoint site.

Responding to LEP Callers

Staff utilize the contracted translation and interpretation provider(s) listed on the internal agency SharePoint site for translation services.

Responding to Written Communications from LEP Persons

Staff utilize the contracted translation and interpretation providers listed on the internal agency SharePoint site for translation services.

Responding to LEP Individuals in Person

The following procedures are followed when an LEP person visits our offices:

- Utilize language identification cards ("I Speak" cards) which assists LEP persons in communicating their language needs
- Contact the contracted translation and interpretation providers listed on the internal agency's SharePoint site for translation services once the language need has been identified.

Staff Training

As noted previously, all Region Ten staff are provided with a list of available language assistance services and additional information and referral resources, updated annually.

All new hires receive training on assisting LEP persons as part of their sensitivity and customer service training. This includes:

- A summary of the transit agency's responsibilities under the DOT LEP Guidance;
- A summary of the agency's language assistance plan;
- A summary of the number and proportion of LEP persons in the agency's service area, the frequency of contact between the LEP population and the agency's programs and activities, and the importance of the programs and activities to the population;
- A description of the type of language assistance that the agency is currently providing and instructions on how agency staff can access these products and services; and
- A description of the agency's cultural sensitivity policies and practices.

Also, all staff who routinely come into contact with customers, as well as their supervisors and all management staff, receive annual refresher training on policies and procedures related to assisting LEP persons.

Providing Notice to LEP Persons

LEP persons are notified of the availability of language assistance through the following approaches:

- On our website, with links to translations of vital documents in other languages.
- Through signs posted on our vehicles and in our customer service and administrative offices.

LEP persons will also be included in all community outreach efforts related to service and fare changes.

Monitoring/updating the plan

This plan will be updated on a periodic basis (at least every three years), based on feedback, updated demographic data, and resource availability.

As part of ongoing outreach to community organizations, Region Ten will solicit feedback on the effectiveness of language assistance provided and unmet needs. In addition, we will conduct periodic assessments of the electronic medical record and review of updated Census data to determine the adequacy and quality of the language assistance provided, and determine changes to LEP needs.

In preparing the triennial update of this plan, Region Ten will conduct an internal assessment using the Language Assistance Monitoring Checklist provided in the FTA's "Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons: A Handbook for Public Transportation Providers."

Based on the feedback received from community members and agency employees, Region Ten will make incremental changes to the type of written and oral language assistance provided as well as to their staff training and community outreach programs. The cost of proposed changes and the available resources will affect the enhancements that can be made, and therefore Region Ten attempt to identify the most cost-effective approaches.

As the community grows and new LEP groups emerge, Region Ten will strive to address the needs for additional language assistance.

C. Minority Representation on Planning And Advisory Bodies

Title 49 CFR Section 21.5(b)(1)(vii) states that a recipient may not, on the grounds of race, color, or national origin, “deny a person the opportunity to participate as a member of a planning, advisory, or similar body which is an integral part of the program.”

Region Ten does not have any transit-related, non-elected planning boards, advisory councils or committees, or similar committees. The members of the agency’s Board of Directors are chosen by the localities served by Region Ten Community Services Board (City of Charlottesville, and the counties of Albemarle, Fluvanna, Green, Louisa, and Nelson), as the board’s makeup is statutorily set in the Code of Virginia (§37.2-501).

SEE APPENDIX F- TABLE MINORITY REPRESENTATION ON COMMITTEES BY RACE

V. MONITORING TITLE VI COMPLAINTS

As part of the complaint handling procedure, the Title VI Manager investigates possible inequities in service delivery for the route(s) or service(s) about which the complaint was filed. Depending on the nature of the complaint, the review examines span of service (days and hours), frequency, routing directness, interconnectivity with other routes and/or fare policy. If inequities are discovered during this review, options for reducing the disparity are explored, and service or fare changes are planned if needed.

In addition to the investigation following an individual complaint, the Title VI Manager periodically reviews all complaints received to determine if there may be a pattern. At a minimum, this review is conducted as part of preparing the Annual Report and Update for submission to DRPT.

APPENDIX A - TITLE VI NOTICE TO THE PUBLIC

Region Ten Community Services Board includes the following language on transportation related printed information materials, on the agency's website, in public notices, and on posters on the interior of each vehicle operated in passenger service.

Region Ten Community Services Board is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transportation services on the basis of race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1B.

If you feel you are being denied participation in or being denied benefits of the transit services provided by Region Ten Community Services Board, or otherwise being discriminated against because of your race, color, national origin, gender, age, or disability, our contact information is:

**Title VI Manager
Region Ten Community Services Board
500 Old Lynchburg Rd.
Charlottesville, VA 22903
434-972-1800
RTCSBTitleVI@regionten.org**

APPENDIX B - TITLE VI NOTICE TO THE PUBLIC LIST OF LOCATIONS

- All Region Ten transportation vans
- Region Ten Administration offices:
 - 500 & 502 Old Lynchburg Road, Charlottesville Virginia
- Region Ten website
 - regionten.org
- Region Ten public offices
 - Fluvanna: 13623 James Madison Highway, Palmyra, VA 22963
 - Greene Emergency Services: 9963 Spotswood Trail, Stanardsville, VA 22973
 - Louisa Clinic: 101 Ashley Street, Louisa, VA 23093
 - Nelson Clinic: 71 Tanbark Plaza, Lovingson, VA 22949
 - Peterson/Preston: 800 Preston Avenue, Charlottesville, VA 22903
- Welcome to Region Ten brochure
 - Available during intake and orientation

APPENDIX C – TITLE VI COMPLAINT FORM

APPENDIX C- TITLE VI COMPLAINT FORM



Region Ten Community Services Board Title VI Complaint Form

Section I	
Name:	
Address:	
Telephone (Home/Cell):	Telephone (Work):
Email Address:	
Accessible Format Requirements?	
☐ Large Print ☐ TDD ☐ Audio ☐ Other	
Section II	
Are you filing this complaint on your own behalf? ☐ Yes ☐ No	
If you answered "yes" to this question go to Section III.	
If not, provide the name and relationship of the person for whom you are complaining.	
Please explain why you have filed for a third party.	
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party: ☐ Yes ☐ No	
Section III	
I believe the discrimination I experienced was based on (check all that apply):	
☐ Race ☐ Color ☐ National Origin	
Date of Alleged Discrimination (Month, Day, Year)	
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as the names and contact information of any witnesses. If more space is needed, use the back of this form.	
Section IV	
Have you previously filed a Title VI complaint with this agency? ☐ Yes ☐ No	
Section V	
Have you filed this complaint with any other federal, state, or local agency, or with any federal or state court?	
If yes, check all that apply:	
☐ Federal Agency	☐ State Agency ☐ Local Agency

Region Ten Community Services Board Title VI Complaint Form

☐ Federal Court	☐ State Court	☐	
Please provide information about a contact person at the agency/court where the complaint was filed			
Name:			
Title:			
Agency:			
Address:			
Telephone Number:			
Section VI			
Name of agency complaint is against:			
Contact person:			
Title:			
Telephone Number			
You may attach any written materials or other information that you think is relevant to your complaint.			
Signature and date required below.			
Signature:		Date:	

APPENDIX D - INVESTIGATIONS, LAWSUITS AND COMPLAINTS



Appendix D Investigations, Lawsuits, and Complaints

Subject	Date (Month, Day Year)	Status (Include basis of Complaint: Race, Color, or National Origin)	Status	Action(s) Taken
Investigations				
1.				
Lawsuits				
1.				
Complaints				
1.				

None to date.

APPENDIX E – SUMMARY OF OUTREACH EFFORTS

Outreach is provided regarding Region Ten's services in response to community needs or requests from partner agencies. Outreach is specific to services, not transportation, but programs that provide transportation are promoted. Services that provide transportation have been promoted at two events in FY 2021, by providing fliers, brochures, and pamphlets. The two events include:

- Suicide Prevention Awareness Resource Council (SPARC) walk in Louisa on 10/24/2020
- Mental Health Awareness Month tabling event in Charlottesville on 5/8/2021

APPENDIX F – TABLE MINORITY REPRESENTATION ON COMMITTEES BY RACE



Appendix F – Table Minority Representation on Committees by Race

Committee	Black or African American	White/Caucasian	Latino/Hispanic	American Indian or Alaska Native	Asian	Native Hawaiian or <u>other</u> Pacific Islander	Other <i>*Note</i>	Totals
Board of Directors								