



# Title VI Plan and Procedures

**Title VI of the Civil Rights Act of 1964**  
***The Arc of Greater Prince William/INSIGHT, Inc.***

***Revised and Approved 9/27/21***  
***By Governing Board***

***Past Approval Dates: 1/28/13, 3/23/15, 8/25/2015, /2/22/2016 & 1/22/18***

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## INTRODUCTION

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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 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." (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") placed renewed emphasis on Title VI issues, including providing meaningful access to persons with Limited English Proficiency ("LEP").

Recipients of public transportation funding from FTA and the Metropolitan Washington Council of Governments ("COG") are required to develop policies, programs, and practices that ensure federal transit dollars are used in a manner that is nondiscriminatory as required under Title VI.

This document details how The Arc of Greater Prince William/INSIGHT, Inc. incorporates nondiscrimination policies and practices in providing services to the public.

## OVERVIEW OF SERVICES

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Since the early 1960's, The Arc of Greater Prince William/INSIGHT, Inc. has provided services to thousands of individuals with developmental disabilities and their families in the greater Prince William area. In the process, we have tirelessly promoted the acceptance and inclusion of people of all abilities and opened new doors in helping individuals achieve a lifetime of success.

### Developmental Child Care Services

Muriel Humphrey Center in Woodbridge and Robert Day Center in Old Town Manassas

Our two licensed developmental child care centers offer a warm, nurturing environment for children and young adults from six months to twenty-two years of age with intellectual and developmental disabilities including children with autism. We specialize in serving those medical and behavioral needs.

### Residential Services

**INSIGHT** is our residential corporation that provides a variety of supportive housing options for adults throughout our community.

**Community Residences (group homes)** provide a family-like environment for adults to live together. Through a person-centered plan, each individual receives the needed support and supervision to successfully live in the community.

**Supported Living** offers a less structured environment for those adults capable of living semi-independently in the community who do not require 24 hour supervision. Individuals may live alone or with roommates in a house or apartment complex.

### Adult Day Services

Opportunities for productive, meaningful and compensated work add significantly to self-esteem for adults.

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**Spinaweb**, our specialty shop in Occoquan, VA, employs weavers who produce beautiful hand-woven fabric that is made into fashionable clothing and boutique items.

**Little Creek Services** provides ground maintenance and janitorial service at various locations throughout the community through mobile work crews.

**VOSAC I, II, III** adult day programs for those needing intensive support including daily medical, provides various opportunities for volunteering in the community, social development, activities of daily living and community integration through leisure interests.

### Leisure and Recreation Services

A wide variety of activities are planned throughout the year to provide enjoyment and enhance social skills for children and adults. Some of these activities are offered weekly while others are seasonal.

### Family Support Services

Each family is unique and has needs different from every other family, particularly if that child has a disability. The Arc's Family Support Program offers a variety of services to help meet these needs including respite care and Parents' Night Out, a monthly parent support group, information and referral services, parent workshops, and the annual Circle of Support Conference held every November.

### Advocacy

From our inception, advocating for the rights, dignity and services for individuals with disabilities has been critical to our mission. In addition to being a major voice in our community, we unite with voices across the state and nation to advocate on issues affecting the disability community.

### Transportation Services

A specialized transportation system provides daily services for our vocational, adult day support programs and the many recreational activities sponsored by The Arc. INSIGHT provides transportation support to our residents to attend medical, day services, recreation and community activities. The majority of vehicles are wheelchair accessible.

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## POLICY STATEMENT AND AUTHORITIES

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### **Title VI Policy Statement**

The Arc 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.

The Arc 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.

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Signature of Authorizing Official

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Date

### **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).

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## Nondiscrimination Assurance to COG

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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 COG submits its annual certifications and assurances to FTA. COG shall collect Title VI assurances from sub-recipients prior to passing through FTA funds.

As part of the Certifications and Assurances submitted to COG at the time of grant application and award, The Arc submits a Nondiscrimination Assurance which addresses compliance with Title VI as well as

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nondiscrimination in hiring (EEO) and contracting (DBE), and nondiscrimination on the basis of disability (ADA).

In signing and submitting this assurance, The Arc confirms to COG our agency's commitment to nondiscrimination and compliance with federal and state requirements.

## PLAN APPROVAL DOCUMENT

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**The Governing Board of The Arc of Greater Prince William hereby acknowledges that on Monday, September 27, 2021 the Board reviewed and adopted The Arc of Greater Prince William/INSIGHT, Inc. Title VI Implementation Plan 2017-2020. We are committed to ensuring that no person is excluded from participation in, or denied the benefits of transportation 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 Federal Transit Administrations sub-recipients. We authorize the Executive Director, Karen L. Smith to sign on our behalf.**

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Signature of Authorizing Official  
Karen L. Smith, Executive Director  
**The Arc of Greater Prince William/INSIGHT, Inc.**

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Date

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## ORGANIZATION AND TITLE VI PROGRAM RESPONSIBILITIES

Under the authority of The Arc's Director of Support Services, will serve as the Title VI Manager and be responsible for ensuring implementation of the agency's Title VI program. is responsible for ensuring implementation of the agency's Title VI program. The specific areas of responsibility are described below.

### **Overall Organization for Title VI**

The Title VI Manager and staff are 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.

### **Title VI Manager Responsibilities**

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.

### **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, The Arc 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.

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## 2. Annual Report and Updates

As a sub-recipient of FTA funds, The Arc is required to submit a log, as part of its Quarterly Report Form to COG that documents any Title VI complaints received during the preceding quarter and for each year. The Arc will also maintain and provide to COG 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, The Arc will submit to COG 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:

- 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 The Arc's 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 according to federal and state laws/regulations. The Title VI program will be available in other languages when needed according to the LEP plan.

## 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. The Arc will report the complaint to COG within three business days (per COG 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 to COG in the Quarterly Report (in addition to immediately).

## 6. Written policies and procedures

The Arc's Title VI policies and procedures are documented in this plan and its appendices and attachments. This plan will be updated periodically to incorporate changes and additional responsibilities that arise.

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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. 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 Executive Director and Director of Support Services.

### 8. Title VI clauses in contracts

In all federal procurements requiring a written contract or Purchase Order (PO), The Arc's contract/PO will include appropriate non-discrimination clauses. The Executive Director is responsible for procurement contracts and PO's to ensure appropriate non-discrimination clauses are included.

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## VII. GENERAL REPORTING REQUIREMENTS

### 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, The Arc shall disseminate this information to the public by posting a Title VI notice on the agency's website, in the reception area of the agency's office, and in federally-funded vehicles.

**A copy of The Arc's TITLE VI NOTICE TO THE PUBLIC; LIST OF LOCATIONS is attached as APPENDIX A.**

## TITLE VI COMPLAINT PROCEDURES

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### 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 The Arc 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 COG within three business days (per COG 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 to COG in the Quarterly Report (in addition to immediately).

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

The Arc includes the following language on printed information materials, on the agency's website, agency's reception area, and on posters on the interior of each vehicle:

***The Arc 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 the Federal Transit Administration (FTA) Circular 4702.1B. For additional information on The Arc's nondiscrimination policies and procedures, or to file a complaint, please visit the website at [www.arcgpw.com](http://www.arcgpw.com) or contact Ms. Joy Ocetnik, Director of Support Services, 13505 Hillendale Drive Woodbridge, VA 22193.***

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.

**A copy of The Arc's TITLE VI COMPLAINT FORM is attached as APPENDIX B.**

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## PROCEDURES FOR HANDLING, TRACKING, RESOLVING AND REPORTING INVESTIGATIONS/COMPLAINTS AND LAWSUITS

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Should any Title VI investigations be initiated by FTA or COG, or if any Title VI lawsuits are filed against The Arc, 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 Arc's Title VI Manager.
  - a. A formal complaint must be filed within 180 calendar days of the alleged occurrence.
  - b. The complaint should include:
    - the complainant's name, address, and contact information
    - (i.e., telephone number, email address, etc.)
    - the 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; and
    - indication of any related complaint activity (i.e., was the complaint also submitted to COG or FTA?)
  - c. The complaint shall be submitted to The Arc Title VI Manager at 13505 Hillendale Drive, 13505 Hillendale Drive, Woodbridge, VA 22193.
  - d. 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.
2. Upon receipt of the complaint, the Title VI Manager will immediately:
  - a. notify COG (no later than 3 business days from receipt)
  - b. notify The Arc's Executive Director
  - c. ensure that the complaint is entered in the complaint database
3. Within 3 business days of receipt of the complaint, the Title VI Manager 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 COG 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.

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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 Executive Director, COG, and, if appropriate, The Arc'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 COG in the event the complainant wishes to appeal the determination. This letter will be copied to COG.
  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.

## Transportation-Related Title VI Investigations, Complaints, and Lawsuits

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### **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

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be included in the Title VI Program submitted to COG every three years and new information regarding complaints, lawsuits, or investigations shall be provided to COG with the Quarterly Report.

[SEE APPENDIX C- Investigations, Lawsuits and Complaints Document](#)

## STAFF TRAINING RELATED TO THE TITLE VI PROGRAM

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Information on The Arc's Title VI program is disseminated to agency employees 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.

The Arc's employees will receive training on Title VI policies and procedures upon hiring. This training will include requirements of Title VI, The Arc's obligations under Title VI (LEP requirement included). Appropriate positions will be notified of required data that must be gathered and maintained and how it relates to the Annual Report and Update to COG, and any findings and recommendations from the last COG compliance review.

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 (which may be for a specific individual or for the entire agency, depending upon the complaint). Title VI training is the responsibility of the Executive Director.

## PUBLIC OUTREACH AND INVOLVEMENT

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The Arc will take appropriate steps to ensure that minority, low-income, and LEP members of the community have meaningful access to public outreach and involvement activities.

### Introduction

The Public Participation Plan (PPP) is a guide for ongoing public participation endeavors. Its purpose is to ensure that The Arc utilizes effective means of providing information and receiving public input on transportation decisions from low income, minority and limited English proficient (LEP) populations, as required by Title VI of the Civil Rights Act of 1964 and its implementing regulations.

Under federal regulations, transit operators must take reasonable steps to ensure that Limited English Proficient (LEP) persons have meaningful access to their programs and activities. This means that public participation opportunities, normally provided in English, should be accessible to persons who have a limited ability to speak, read, write, or understand English.

In addition to language access measures, other major components of the PPP include: public participation design factors; a range of public participation methods to provide information, to invite participation and/or to seek input; examples to demonstrate how population-appropriate outreach methods can be and were identified and utilized; and performance measures and

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objectives to ensure accountability and a means for improving over time.

The Arc established a public participation plan or process that will determine how, when, and how often specific public participation activities should take place, and which specific measures are most appropriate.

The Arc will make these determinations based on a demographic analysis of the population(s) affected, the type of plan, program, and/or service under consideration, and the resources available.

**SOME OF THOSE EFFECTIVE PUBLIC OUTREACH PRACTICES INCLUDE:**

- a. Determine and identifying what meetings and program activities lend themselves to client public participation.
- b. Scheduling meetings at times and locations that are convenient and accessible for minority and LEP communities.
- c. Employing different meeting sizes and formats.
- d. Coordinating with community and faith-based organizations, educational institutions, and other organizations to implement public engagement strategies that reach out specifically to members of affected minority and /or LEP communities.
  
- e. Considering radio, television, or newspaper ads on stations and in publications that serve LEP populations. Outreach to LEP populations could also include audio programming available on podcasts.
- f. Providing opportunities for public participation through means other than written communication, such as personal interviews or use of audio or video recording devices to capture oral comments.

A copy of The Arc's SUMMARY OF OUTREACH EFFORTS is attached as APPENDIX D.

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## ACCESS FOR LIMITED ENGLISH PROFICIENT (LEP) PERSONS

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### 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 The Arc is based on FTA guidelines.

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

### Assessment of Needs and Resources

#### **Factor 1: Assessment of the number and Proportion of LEP Persons Likely to be Served or Encountered in the 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 (2006-2010)**

Data from the U.S. Census Bureau's American Community Survey (ACS) were obtained through [www.census.gov](http://www.census.gov) by The Arc's service area. The agency's service area includes a total of 45,652 or 13.2% of the total population with Limited English Proficiency (those persons who indicated that they spoke English "less than very well" in the ACS Census).

Information from the 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. This data indicates that Spanish makes up 70% of the LEP population in our community with the estimate of 32,116 stating that they speak English less than very well. No other specific language meets the 5% or 1,000-person threshold.

The following language assistance measures are currently being provided by The Arc

- Three individuals employed by the agency are proficient in Spanish and are available to translate on an as needed basis. In addition, the agency maintains a list of professional translators if the need

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should arise. The cost this past year was minimal but we anticipate that in the future the agency could incur costs specifically for this area

- Based on the analysis of demographic data The Arc has determined that no additional services are needed to provide meaningful access.

### **Factor 2: Assessment of Frequency LEP Individuals Come into Contact with the Transit Services**

The Arc reviewed the relevant benefits, services, and information provided by the agency and determined the extent to which LEP persons have encountered these functions through one or more of the following channels: (this section should be updated to reflect your agency's preferred language and procedures)

- Contact with agency drivers:
- Calls to The Arc;
- Visits to the agency's headquarters;
- Access to the agency's website;
- Attendance at meetings hosted by The Arc: and
- Contact with the agency's ADA complementary para-transit system (including applying for eligibility, making reservations, and communicating with drivers).

We have good communication between the individuals and the families we transport and never had a complaint or concern voiced by a LEP person. In our educational workshops we have available a Spanish interpreter.

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 what 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**

The Arc provides transportation to the following programs, activities and services:

- Adult Day Services
- Community Engagement
- Employment
- Residential Services
- Recreation and Leisure Activities

Based on past experience serving and communicating with LEP persons and interviews with community agencies, we learned that transportation to adult day services and recreation events are currently of particular importance to LEP persons in the community.

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

- Safety and security awareness instructions;
- Emergency evacuation procedures.

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

### **Costs**

At the present time there is little or no associated costs with translating documents and the percentage of staff time is currently minimal. This may increase in the future.

Based on the analysis of demographic data and contact with community organizations and LEP person, The Arc has determined that additional services may be needed to provide meaningful access.

### **Resources**

The available budget that could be devoted to additional language assistance expenses is \$500. This amount is likely to increase over time. The Arc has also requested the following additional grant funding for language assistance: In addition, in-kind assistance may be available through qualified community volunteers to provide written and oral language translation. Telephonic and video conference interpretation services may also be used.

### **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: Spanish.

## LEP Implementation Plan

Through the above analysis, The Arc has determined that the following types of language assistance are most needed and feasible:

- ***Attempt to hire bilingual staff with competency in spoken and written Spanish, etc. as appropriate for our service area.***
- ***Language Line Translation Services for telephone contacts.***
- ***In-person translation for ADA eligibility assessments.]***

## Staff Access to Language Assistance Services

Agency staff members who come into contact with LEP persons can access language services by contacting the office requesting the Human Resources Department or a staff person who is bi-lingual. Staff members will be provided with a list of available language assistance services and additional information and referral resources (such as community organizations which can assist LEP persons). This list will be updated at least annually.

## Responding to LEP Callers

Staff members who answer calls from the public respond to LEP customers as follows: a staff member who is proficient in Spanish will aid the individual or if another language will make best faith effort to locate an appropriate interpreter.

## Responding to Written Communications from LEP Persons

The following procedures are followed when responding to written communications from LEP persons: the agency will make available bilingual staff members to help with interpretation.

## Responding to LEP Individuals in Person

The availability of bi-lingual staff will be available when an LEP person visits our administrative office.

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If a LEP person is being transported by the agency, the agency will do its best to assign a bilingual staff member to transport that person.

## Staff Training

The Arc staff members will be notified of language assistance services and additional information and referral resources, which will be 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 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. This will be included with the annual Human Rights Training.

## Providing Notice to LEP Persons

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

- ***following our Title VI policy statement included on our vital documents.***
- ***on our website.***
- ***through signs posted in our vehicles and in our administrative offices.***

## 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, The Arc will solicit feedback on the effectiveness of language assistance provided and unmet needs. In addition, we will conduct periodic assessments of the US Census data of the adequacy and quality of the language assistance provided, and determines changes to LEP needs.

Based on the feedback received from community members and agency employees, The Arc 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 The Arc will attempt to identify the most cost-effective approaches.

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

**A copy of The Arc's LAP is attached as APPENDIX E**

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## MINORITY REPRESENTATION ON GOVERNING BOARD

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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.”

The Arc has a Governing Board that actively recruits and encourages participation of minorities on the Governing Board. At the annual meeting of the agency, the slate of nominees is presented to the membership for approval. See APPENDIX F

### 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 grant application (ATP) for submission to the COG.

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



*Achieve with us.®*

Karen L. Smith, Executive Director

## APPENDIX A

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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 200d).

The Arc is committed to ensuring that no person is excluded from participation in, or denied 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 The Arc, or otherwise being discriminated against because of your race, color, national origin, gender, age, or disability, our contact information is:

Ms. Karen L. Smith  
Executive Director  
The Arc of Greater Prince William/INSIGHT, Inc.  
13505 Hillendale Drive  
Woodbridge, VA 22193  
703-670-4800  
[Ksmith@arcgpw.org](mailto:Ksmith@arcgpw.org)

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

Title VI information will be posted at the following locations of the agency:

MAIN OFFICE

ALL VEHICLES

APPENDIX B

**TITLE VI COMPLAINT FORM**

<b>Section I:</b>			
Name:			
Address:			
Telephone (Home):		Telephone (Work):	
Electronic Mail Address:			
Accessible Format Requirements?	Large Print		Audio Tape
	TDD		Other
<b>Section II:</b>			
Are you filing this complaint on your own behalf?		Yes*	No
*If you answered "yes" to this question, go to Section III.			
If not, please supply 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
<b>Section III:</b>			
I believe the discrimination I experienced was based on (check all that apply):			
<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> 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 names and contact information of any witnesses. If more space is needed, please use the back of this form.			
_____			
_____			
<b>Section IV</b>			
Have you previously filed a Title VI complaint with this agency?		Yes	No
<b>Section V</b>			
Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?			
<input type="checkbox"/> Yes <input type="checkbox"/> No			

If yes, check all that apply:	
<input type="checkbox"/> Federal Agency: _____	
<input type="checkbox"/> Federal Court _____	<input type="checkbox"/> State Agency _____
<input type="checkbox"/> State Court _____	<input type="checkbox"/> Local Agency _____
Please provide information about a contact person at the agency/court where the complaint was filed.	
Name:	
Title:	
Agency:	
Address:	
Telephone:	
<b>Section VI</b>	
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

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## APPENDIX C- Investigations, Lawsuits and Complaints Document

We have not received any complaints therefore there are no investigations or lawsuits.

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## APPENDIX E-Language Assistance Plan

### **Public Outreach Activities**

The Arc will take appropriate steps to ensure that minority, low-income, and LEP members of the community have meaningful access to public outreach and involvement activities. This includes but is not limited to printed material, website, public notices, and community meetings.

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APPENDIX F- Minority representation on Governing Board by race FY 2022

<b>CAUCASIAN</b>	<b>9</b>
<b>BLACK</b>	<b>4</b>