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**Title VI Plan and Procedures**

# **Rappahannock Area**

## **Community Services Board**

## **Specialized Transportation**



**Adopted date**

**October 4, 2024**

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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 Rappahannock Area Community Services Board incorporates nondiscrimination policies and practices in providing services to the public. Rappahannock Area Community Services Board 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 Rappahannock Area Community Services Board (RACSB) is committed to improving the quality of life for people residing in Planning District 16 with mental health, developmental disability and substance abuse problems and preventing the occurrence of these conditions. We do this thru integrated and community-based system of care that is responsive to individual needs and choices. We respect and promote the dignity, rights, and full participation of all participants and their families.

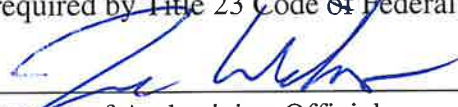
The focus is to provide safe, efficient and reliable transportation service for individuals to and from agency sponsored programs. This manual is set forth to provide all RACSB vehicle operators in the agency with specific guidelines to help them perform their jobs professionally while promoting an atmosphere of mutual respect and caring among everyone involved in the transportation process.

### III.POLICY STATEMENT AND AUTHORITIES

#### Title VI Policy Statement

**Rappahannock Area Community Services Board** 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 **Rappahannock Area Community Services Board** 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.

  
\_\_\_\_\_  
Signature of Authorizing Official

9/27/24  
\_\_\_\_\_  
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).

#### **IV. 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 DRPTR Rappahannock Area Community Services Board 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, Rappahannock Area Community Services Board confirms to DRPT the agency's commitment to nondiscrimination and compliance with federal and state requirements.

**V. PLAN APPROVAL DOCUMENT**

I hereby acknowledge the receipt of the Rappahannock Area Community Services Board Title VI Implementation Plan 2024 - 2026. 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.



Signature of Authorizing Official  
Joseph Wickens, Executive Director  
Rappahannock Area Community Services Board



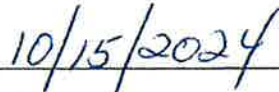
Date

**SEE APPENDIX F- BOARD OF DIRECTORS MEETING AGENDA**

**RAPPAHANNOCK AREA**  
COMMUNITY SERVICES BOARD

We hereby acknowledge the receipt of the Rappahannock Area Community Services Board (RACSB) Title VI Implementation Plan. We have reviewed and approve the Plan. RACSB Board of Directors are committed to ensuring that no person is excluded or denied services provided by RACSB transportation on the basis of race, color, or national origin as protected by Title VI Federal Transit Administration (FTA) Circular 4702.1B Title VI requirements and guidelines for FTA sub-recipients.

  
\_\_\_\_\_  
Signature of Authorizing Official

  
\_\_\_\_\_  
Date

Nancy Beebe  
Chairperson of the Board of Directors  
Rappahannock Area Community Services Board



## ORGANIZATION AND TITLE VI PROGRAM RESPONSIBILITIES

The Rappahannock Area Community Services Board Director of Compliance and Human Rights is 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 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.

### **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.

## **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, Rappahannock Area Community Services Board Specialized Transportation 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, Rappahannock Area Community Services Board Specialized Transportation 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. Rappahannock Area Community Services Board Specialized Transportation will also maintain and provide to DRPT 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. Rappahannock Area Community Services Board Specialized Transportation 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 documented in this plan and its appendices and attachments. This plan will be 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 Director of Compliance and Human Rights.

#### **8. Title VI clauses in contracts**

In all federal procurements requiring a written contract or Purchase Order (PO), Rappahannock Area Community Services Board Specialized Transportation’s contract/PO will include appropriate non-discrimination clauses. The Title VI Manager will work with the Director of Finance or their designee who is/are responsible for procurement contracts and PO’s to ensure appropriate non-discrimination clauses are included.

## **VI. 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, Rappahannock Area Community Services Board Specialized Transportation 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).

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).

Rappahannock Area Community Services Board Specialized Transportation 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 Rappahannock Area Community Services Board Specialized Transportation, or otherwise being discriminated against because of your race, color, national origin, gender, age, or disability, our contact information is:

**SEE APPENDIX A -Title VI Notice to the Public**

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

## 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 Rappahannock Area Community Services Board Specialized Transportation, 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.

The following language is printed on and on posters on the interior of each vehicle operated in passenger service:

*Rappahannock Area Community Services Board Specialized Transportation 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 Rappahannock Area Community Services Board Specialized Transportation nondiscrimination policies and procedures, or to file a complaint, please visit the website at [rappahannockareacsb.org](http://rappahannockareacsb.org) or contact Stephanie Terrell, Director of Compliance and Human Rights at 600 Jackson Street, Fredericksburg, Virginia 22401.*

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 included within Rappahannock Area Community Services Board Specialized Transportation brochure.

**SEE APPENDIX C - Title VI Complaint Form**

## **Procedures for Handling and Reporting Investigations/Complaints and Lawsuits**

Should any Title VI investigations be initiated by FTA or DRPT, or any Title VI lawsuits are filed against Rappahannock Area 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
    - (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
    - 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 Rappahannock Area Community Services Board Title VI Manager at 600 Jackson Street, Fredericksburg Virginia, 22401 or [sterrell@rappahannockareacsb.org](mailto:sterrell@rappahannockareacsb.org).
  - e. Complaints received by any other employee of Rappahannock Area Community Services Board will be immediately forwarded to the Title VI Manager.
  - 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 Office of Consumer Affairs will assist the complainant in converting the verbal allegations to writing.
2. Upon receipt of the complaint, the Title VI Manager will immediately:
  - a. notify DRPT (no later than 3 business days from receipt)
  - b. notify the Rappahannock Area Community Services Board Authorizing Official
  - 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 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, Rappahannock Area Community Services Board 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 Rappahannock Area 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 - Investigations, Lawsuits, and Complaints Document**



## **VII. PUBLIC OUTREACH AND INVOLVEMENT**

### **PUBLIC PARTICIPATION PLAN**

#### **Introduction**

The Public Participation Plan (PPP) is a guide for ongoing public participation endeavors. Its purpose is to ensure that Rappahannock Area Community Services Board 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 objectives to ensure accountability and a means for improving over time.

Rappahannock Area Community Services Board 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.

Rappahannock Area Community Services Board 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. Efforts to involve minority and LEP populations in public participation activities may include both comprehensive measures, such as placing public notices at all transit stations, stops, and vehicles, as well as targeted measures to address linguistic, institutional, cultural, economic, historical, or other barriers that may prevent minority and LEP persons from effectively participating in our decision-making process.

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

- a. Placing public notices at all transit stations, stops, and vehicles

**SEE APPENDIX E - Summary of Outreach Efforts**

## **VIII. 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 Rappahannock Area Community Services Board is based on FTA guidelines.

As required, Rappahannock Area Community Services Board developed a written LEP Plan (below). Using American Community Survey (ACS) Census data, Rappahannock Area Community Services Board 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 (2018-2022)**

Data from the U.S. Census Bureau's American Community Survey (ACS) were obtained through [www.census.gov](http://www.census.gov) by Rappahannock Area Community Services Board's service area. The agency's service area includes a total of 23,156 (6.30%) persons with Limited

English Proficiency (those persons who indicated that they spoke English “less than very well,”).

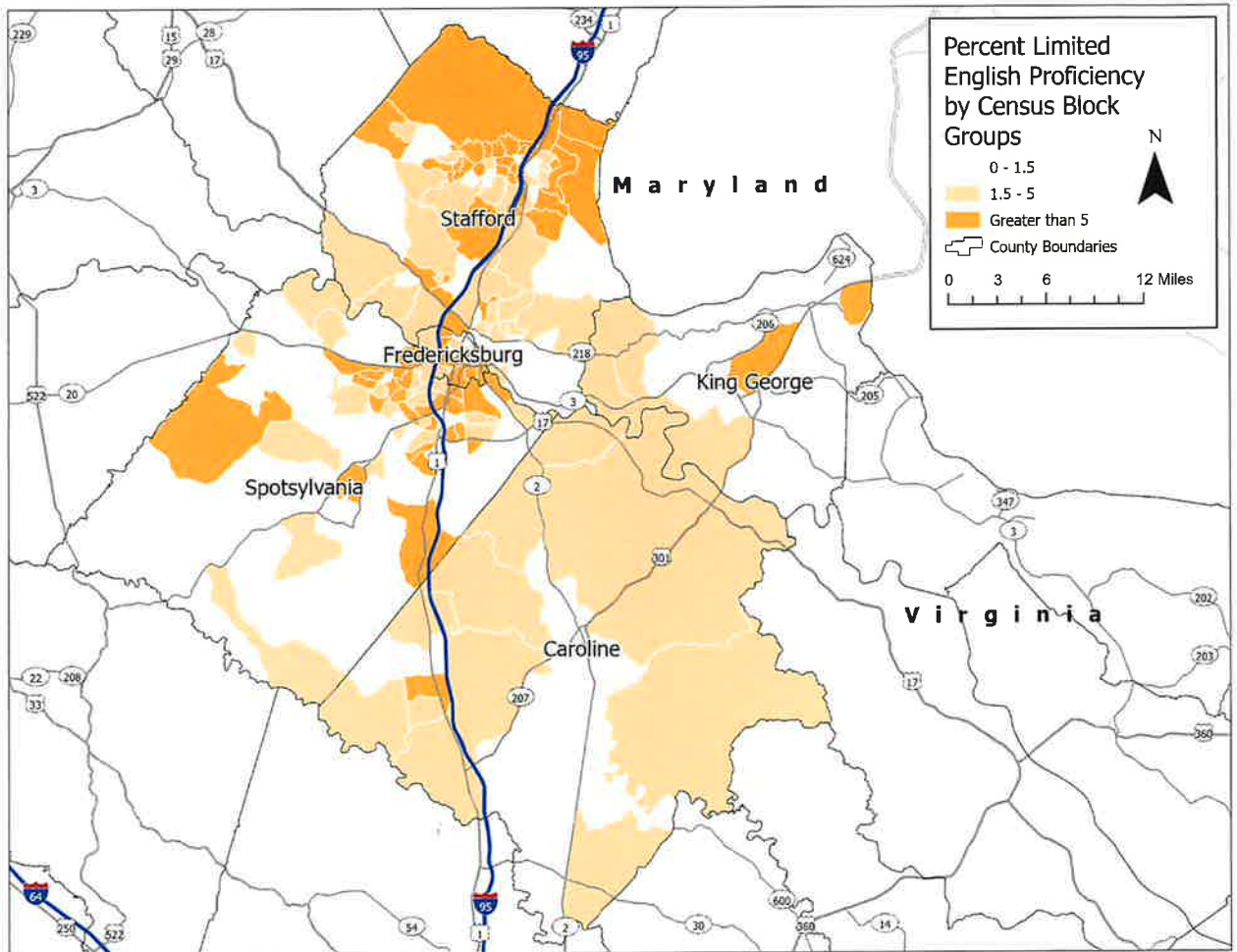
Information from the 2018-2022 ACS also provides more detail on the specific languages that are spoken by those who report that they speak English less than very well. Languages spoken at home by those with LEP are presented below. These data indicate the extent to which translations into other language are needed to meet the needs of LEP persons.

**Table 1: Number of LEP Population**

<b>Rappahannock Area CSB Service Area</b>			
<b>Language</b>	<b>Number of LEP Population</b>	<b>Percent of Service Area Population Speaking Language</b>	<b>Percent of LEP Population Speaking Language</b>
Spanish	13,164	3.58%	56.85%
French, Haitian, or Cajun	1,955	0.53%	8.44%
German or other West Germanic languages	35	0.01%	0.15%
Russian, Polish, or other Slavic languages	131	0.04%	0.57%
Other Indo-European languages	3,454	0.94%	14.92%
Korean	581	0.16%	2.51%
Chinese (incl. Mandarin, Cantonese)	333	0.09%	1.44%

Vietnamese	171	0.05%	0.74%
Tagalog	576	0.16%	2.49%
Other Asian and Pacific Island languages	696	0.19%	3.01%
Arabic	368	0.10%	1.59%
Other and unspecified languages	1,692	0.46%	7.31%
Total LEP Population	23,156	6.30%	
Total Service Area Population	<b>367,576</b>		

**Figure 1: Percentage of LEP By Census Block Group**



The most spoken language by persons in the LEP population is Spanish (13,164). Two other languages are spoken by more than 5% or 1,000 persons in the LEP population: Other Indo-European languages (3,454) and other unspecified languages (1,692). Figure 1 shows the percentage of LEP by Census Block Group. There are large populations of LEP in and north of Stafford, surrounding Fredericksburg, Spotsylvania and King George.

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

Rappahannock Area Community Services Board 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 *one or more* of the following channels:

- Contact with transit vehicle operators;
- Contact with transit station managers;
- Calls to Rappahannock Area Community Services Board Office of Consumer Affairs telephone line;
- Access to the agency website;

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.

### **Information from Community Organizations that Serve LEP Persons (Optional?)**

To supplement the Census, education, and labor department data, Rappahannock Area Community Services Board conducted community outreach to the following organizations that work with LEP populations.

- *School systems;*
- *Community organizations;*
- *State and local governments;*
- *Religious organizations;*
- *Legal aid entities.*

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

Rappahannock Area Community Services Board provides the following programs, activities and services:

Rappahannock Area Community Services Board (RACSB) is comprised of a variety of services and programs meeting the support needs of persons living in Planning District 16 that have mental health, substance use, and/or developmental disability diagnoses. Carefully orchestrated transportation is an integral part of conducting our services and to linking people to needed resources in their community in order to help build better lives. The following service descriptions characterize our service areas and how transportation plays its role in accomplishing these program missions:

#### **Developmental Disability Day Programming:**

RACSB provides licensed Developmental Disability Day Programming as mentioned. Rappahannock Adult Activities, Inc. (RAAI) provides day support services to people with

disabilities that offer socialization and engagement opportunities within the community. In these services, individuals travel to and from vast community destinations multiple times a day to create connections with others, both through volunteering and in participating in activities amongst the general public. RAAI affords families a caring support structure for their loved ones to attend during the week. Participants benefit from social engagement and activities while also working on independent living skills. For those who do not live in RACSB's residential facilities, RAAI relies on our Specialized Transportation program to get people to programming daily.

To be eligible for RACSB Developmental Day Services, an individual must meet the following criteria: a primary diagnosis of developmental disability, must be over 18 years of age, out of high school and live in Virginia with preference given to those residing in planning district 16. RAAI Day Support drove 200767 miles within Planning District 16 during FY 2024 accomplishing and working on service goals and engagement. The program provided 36,674 trips to approximately 114 individuals with disabilities.

### **Psychosocial Rehabilitation:**

The Kenmore Club Program provides psychosocial rehabilitation to adults over the age of 18 with a diagnosis of serious mental illness who have experienced multiple hospitalizations, crisis stays, incarceration, or some other disruptive living situation due to their illness. The program supports individuals to help them overpower mental health barriers through integrating them amongst their community to accomplish personal goals and partake in healthy living/skill building activities. In linking people to resources and achieving these goals, Kenmore Club staff drove 14,262 miles during FY2024, allowing 83 individuals to access 8,456 trips into their larger community to work on their goals and integration needs.

### **Developmental Disability Residential Services:**

RACSB Residential Services are licensed by DBHDS and designed to provide training, supports and services for individuals that meet the diagnostic criteria of developmental disabilities. The program's specific focus is for individuals to receive services in a home environment that is safe, appropriate to their level of care and properly staffed to provide required supports. We value inclusion and work to support folks in accessing and participating alongside other members of their community in all offerings, including work, leisure and business. During FY2024, RACSB Residential drove 173,345 miles and completed 28,191 trips in the provision of our support services to approximately 34 individuals.

Individuals referred to RACSB Residential services must meet the following minimum criteria to be considered for admission: a diagnosis of developmental disability, must be over 18 years of age if not living with family or legal guardian at time of application for admission, must have an expressed desire to live in the community, develop daily living skills, and to receive supports for their health and safety needs.

Based on past experience serving and communicating with LEP persons and interviews with community agencies, *[as well as questionnaires or direct consultations with LEP persons (if applicable, e.g. through focus groups or individual interviews facilitated/interpreted by a community agency)]*, we learned that the following services/routes/programs are currently of particular importance LEP persons in the community.

The following are the most critical services provided by Rappahannock Area Community Services Board 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 Rappahannock Area Community Services Board

- We are currently not providing translation of documents, but verbal interpretations are always made available utilizing the Language Line Service

We anticipate that these activities and costs will remain the same based on the fact that we do not currently provide translation of documents due to the low number of LEP individuals in PD16. As stated previously interpretative services are always available using the Language Line Services.

Based on the analysis of demographic data and contact with community organizations and LEP persons, Rappahannock Area Community Services Board has determined that the following additional services are ideally needed to provide meaningful access:

- Our existing language assistance is sufficient to meet and even exceed demand.

##### Resources

The available budget that could be currently be devoted to additional language assistance expenses is \$0.00. This amount is likely to be stable over time.



Rappahannock Area Community Services Board has also requested the following additional grant funding for language assistance:

In addition, in-kind assistance may be available through *agency staff members*.

### ***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:

- Language Line Services for interpretation.

## **LEP Implementation Plan**

Through the four-factor analysis, Rappahannock Area Community Services Board has determined that the following types of language assistance are most needed and feasible:

- ***Language Line Translation Services for telephone contacts.***

### ***Staff Access to Language Assistance Services***

Agency staff who come into contact with LEP persons can access language services by calling Language Line Services for assistance. All staff 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 who answer calls from the public respond to LEP customers as follows: Contacting the Language Line Services for interaction and assistance.

### ***Responding to Written Communications from LEP Persons***

The following procedures are followed when responding to written communications from LEP persons: The recipient will utilize available resources to interpret the communication or will utilize Language Line Services to interact with the person inquiring.

### ***Responding to LEP Individuals in Person***

The following procedures are followed when an LEP person visits our customer service and administrative office: The Language Line will be contacted immediately to provide interpretation.

The following procedures are followed by operators when an LEP person has a question on board a Rappahannock Area Community Services Board vehicle: Referred to telephone assistance with Language Line Services.

### ***Staff Training***

As noted previously, all Rappahannock Area Community Services Board 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:

- ***Upon request when interaction with agency staff.***

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, Rappahannock Area Community Services Board will solicit feedback on the effectiveness of language assistance provided and unmet needs. In addition, we will conduct periodic review of census data and internal meetings will be used to determine if the adequacy and quality of the language assistance provided, and determine changes to LEP needs.

In preparing the triennial update of this plan, Rappahannock Area Community Services Board 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." *[This checklist attached at the end of this sample plan.]*

Based on the feedback received from community members and agency employees, Rappahannock Area Community Services Board 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 Rappahannock Area Community Services Board will attempt to identify the most cost-effective approaches.

As the community grows and new LEP groups emerge Rappahannock Area Community Services Board will strive to address the needs for additional language assistance.

## **IX. 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.”

*Rappahannock Area Community Services Board Specialized Transportation does not have a transit-related, non-elected planning boards, advisory councils or committees, or similar committees, the membership of which we select.*

## **X. 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**

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).

Rappahannock Area 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 Rappahannock Area Community Services Board Specialized Transportation, or otherwise being discriminated against because of your race, color, national origin, gender, age, or disability, our contact information is:

**Name:** Stephanie Terrell

**Title:** Director of Compliance and Human Rights

**Agency Name:** Rappahannock Area Community Services Board

**Address:** 600 Jackson Street

**City, State Zip code** Fredericksburg, Virginia 22401

**Telephone Number** 540-940-2328

**Email address** [sterrell@rappahannockareacsb.org](mailto:sterrell@rappahannockareacsb.org)

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

RACSB Web Site [www.Rappahannockareacsb.org](http://www.Rappahannockareacsb.org)

Rappahannock Adult Activities Inc. Locations: All Agency vehicles providing transportation to the individuals we support.

19254 Rogers Clark Blvd. Ruther Glen, VA 22546

8479 St. Anthony's Rd. King George, VA 22458

7424 Brock Rd. Spotsylvania, VA 22553

750 Kings Hwy Fredericksburg, VA 22405

15 Hope Rd. Stafford, VA 22554

All Agency vehicles providing transportation to the individuals we support.

Kenmore Club 632 Kenmore Ave. Fredericksburg, VA 22401

All Agency vehicles providing transportation to the individuals we support.

RACSB Residential Offices 10825 Tidewater Trail, Fredericksburg, VA 22408

All Residential transportation vehicles located at each program.

### APPENDIX C - TITLE VI COMPLAINT FORM

<b>SECTION I</b>		
Address:		
City :	State:	
Telephone (cell)	Telephone (work)	
Email Address:		
Accessible Format Requirements?	Large Print	Audio Tape
	TDD	Other
<b>SECTION II</b>		
Are you filing this complaint on your 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):		
( )	( ) Color	( ) National Origin

Race		
Date of Alleged Discrimination (Month, Date, 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?		
(     ) Yes	(     ) (     ) No	

**APPENDIX D - INVESTIGATIONS, LAWSUITS AND COMPLAINTS DOCUMENT**

**APPENDIX D**

**Investigations, Lawsuits and Complaints Document**

**RACSB does not have any ongoing Title VI investigations, lawsuits or complaints.**

**List of Investigations, Lawsuits and Complaints**

	Date (Month, Day, Year)	Summary (include basis of complaint: race, color or national origin)	Status	Action(s) taken

<b>Investigations</b>				
<b>1. None</b>				
<b>Lawsuits</b>				
<b>1. None</b>				
<b>Complaints</b>				
<b>1. None</b>				

**APPENDIX E - SUMMARY OF OUTREACH EFFORTS**

- a. Rappahannock Area Community Services Board website.  
[www.rappahannockareacsb.org](http://www.rappahannockareacsb.org)
- b. Rappahannock Area Community Services Board Facebook page
- c. Media releases through The Freelance Star and local radio stations.
- d. Rappahannock Adult Activities Inc Community Engagement Program:
  - i. Faith Based Organizations
  - ii. YMCA
  - iii. Holiday Plant Sales

**APPENDIX F - BOARD OF DIRECTORS MEETING AGENDA**



# RAPPAHANNOCK AREA COMMUNITY SERVICES BOARD

**October 15, 2024**

600 Jackson Street, Board Room 208  
Fredericksburg, VA, 22401

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