
Title VI Plan and Procedures
Title VI of the Civil Rights Act of 1964
The Arc of Harrisonburg and Rockingham



Adopted date
October 22, 2018

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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 **The Arc of Harrisonburg and Rockingham (The Arc)** incorporates nondiscrimination policies and practices in providing services to the public. **The Arc's** Title VI policies and procedures are documented in this plan and its appendices and attachments. This plan will be updated periodically (at least every three years) to incorporate changes and additional responsibilities that arise.

II. OVERVIEW OF SERVICES

The Arc of Harrisonburg and Rockingham actively supports and advocates for individuals with intellectual and developmental disabilities (I/DD) and works toward their community inclusion and access. The Simon-Edmonson Center is a year-round Mon-Fri, day support program located in the Lucy F. Simms Continuing Education Center which serves 47 adults with primarily intellectual disabilities. The Simon-Edmonson provides meaningful opportunities for participants to learn independent living skills, self-direction and pre-employment skills in a safe, supported environment. Participants receive transportation to and from the center and their residence daily.

SpArc is a community engagement program which supports and fosters individuals' abilities to acquire, retain, or improve skills necessary to build positive social behavior, interpersonal competence, greater independence, employability, and personal choices necessary to access typical activities and functions of

community life such as those chosen by the general population. These may include community education or training and volunteer activities. Community engagement provides a wide variety of opportunities to facilitate and build relationships and natural supports in the community, while utilizing the community as a learning environment. Sparc's "Arc Angels" volunteer for Meals on Wheels, Salvation Army, Sentara RMH, Asbury United Methodist Church, Hope Distributed, Elkton Area Community Center to name only a few. 46 persons are enrolled in SpArc and participate on teams which consist of 3 team members and a direct support professional. Each team is transported in a 5passenger vehicle or two teams may ride in a 9-passenger vehicle if they are traveling to separate destinations or will separate into two groups upon arrival at a single destination. Community engagement takes place when events and activities occur naturally: days and evenings, weekdays and weekends. Over 16,500 hours of community engagement services are provided annually.

Supported In-Home and Respite Care are one-on-one day, evening, and weekend programs which work with individuals on person-centered plan goals and outcomes in their own home and in the community. This type of care provides families with the opportunity to take a much-needed moment for themselves while their loved one is in the care of a trained professional. 1,600 hours of In-home and respite care supports were provided annually. Transportation is provided to access medical or other appointments and to provide access to the community and its activities.

Transportation services are provided because mobility and/or intellectual difficulties prevent consumers from driving or using other forms of transportation. The great majority of The Arc participants live in Rockingham County. The Arc vehicles provide daily to/from transportation as well trips for daily community and volunteer activities. The Arc provides over 13,000 rides and covers over 25,000 miles on behalf of our consumers annually.

III. Policy Statement and Authorities

The Arc of Harrisonburg and Rockingham is committed to ensuring that no person shall, on the grounds of ability, 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 of Harrisonburg and Rockingham's 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) Part200, and Title 49 CFR Part 21.



Signature of Authorizing Official

October 22, 2018

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 DRPT, **The Arc of Harrisonburg and Rockingham** 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, **The Arc of Harrisonburg and Rockingham** confirms to DRPT the agency's commitment to nondiscrimination and compliance with federal and state requirements.

V. PLAN APPROVAL DOCUMENT



Board Meeting Minutes

10/22/18

The Arc actively supports and advocates for individuals with developmental disabilities.

Board Members Present: James Ward (President), Carroll Ward (Vice-President), Jennifer Bridges (Secretary), Joe Perrone (Treasurer), Ben Entsminger, Jeannine Peterson, Kara Westerbeek, Kirsten Beachy

Arc Staff Present: Heather Denman (Executive Director)

Self-Advocates Present: Dick Simon

Other Persons Present: Jenna Bryant

Public Comment: None

Consent Agenda:

- C1. Minutes of the 9/17/18 Board Meeting
- C2. Staff Reports
- C3. Medicaid Reimbursements by Service Report
- C3. Treasurer's Report

Kirsten Beachy made a motion to accept the Consent Agenda as presented. Carroll Ward seconded the motion. The motion carried.

Action Items:

- A1. Approve participation in The Arc of the US annual board meeting

Annual Board Business Meeting will be in Nashville, TN on November 9th and our local chapter has a vote at this meeting, either by chapter representative or by proxy. Board members have the option of attending if they choose. The board opted to have Tonya Milling from The Arc of Virginia be our proxy if no other board member steps forward to attend. James will email board members not in attendance at tonight's meeting. Carroll Ward made this motion and Joe Perrone seconded it. The motion carried.

Information Item:

- I1. Title VI Plan

DRPT requires The Arc to submit a revised plan every 3 years. The focus of Title VI is to provide a plan to serve and accommodate Limited English Proficient (LEP) citizens. Heather Denman shared census data of LEP in The Arc of Harrisonburg and Rockingham's service area. The Arc serves predominantly those with intellectual disabilities who represent only 3% of the general population therefore, the LEP population is very minimal in the DD population. The Arc will pursue translation of pertinent documents into the Spanish language which has the highest percentage of LEP in our locality. The Title VI plan was approved by the board following a motion by Kara Westerbeek and a second by Carroll Ward.

Discussion Items:

- D1. Arctoberfest

Weather and competing events seemed to hinder attendance. Consideration given to a September date, starting earlier (which is not possible at the Turner

Pavilion on Saturday due to the Farmers Market) or changing location. Survey of options to be considered. Committee is planning a formal debriefing meeting.

D2. Santa Run

Jenna Bryant has been contracted specifically to assist with Santa Run. She has a background in event organizing and advocacy. Goals for Santa Run include raising \$20,000 and having 100 participants. Adult entry fee is \$20 and child entry fee is \$10. Teams will also be entered in the race, as well as pledged runners. An EventBrite page has been created for registration. Santa Run will take place immediately before the Harrisonburg Holiday Parade on December 7, 2018. Jenna is creating tool kits to be given to potential sponsors, participants and media and will distribute these to the board in digital format. Jenna ran down a list of tasks needed to be accomplished, such as gathering sponsors, donors, volunteers, prizes, and vendors.

D3. Strategic Planning Meeting (Hotel Madison)

The board will attend a morning strategic planning session and then staff will have a training session in the afternoon. We need to set short, medium and long-term goals. A SWOT analysis strategy would be helpful, analyzing Strengths, Weaknesses, Opportunities and Threats. We are projecting this to happen after the first of the year. Heather will poll the board members for January and February dates.

D4. 2019 Budget

Heather Norton of the DBHDS said there would be a rate refresh in August of 2018, but this never happened. Once we have confirmation on a rate change, Joe Perrone, Justin Showalter and possibly Jan Rhodes will be involved in the budget process.

Old Business: Board portal www.hrarc.org

The portal is not an http and therefore is not secure. We are working on securing this. Documents and all info in board and staff portal will be available once secured.

Adjourn: The meeting adjourned at 7:42 pm.

Next meeting date: November 19, 2018 at 6:30 pm at the Lucy F. Simms Continuing Education Center board room.

Respectfully Submitted,

Jennifer Bridges,

Secretary

I hereby acknowledge the receipt of The Arc of Harrisonburg and Rockingham Title VI Implementation Plan 2018-2021. The board of directors 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 ability, 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.



October 22, 2018

Signature of Authorizing Official

DATE

Heather Denman, Executive Director

The Arc of Harrisonburg and Rockingham

VI. ORGANIZATION AND TITLE VI PROGRAM RESPONSIBILITIES

The Arc's Director of Support Services 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 Executive Director, designates 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, The Arc of Harrisonburg 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, **The Arc of Harrisonburg and Rockingham** 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. The Arc of Harrisonburg and Rockingham will also maintain and provide to DRPT on an annual basis, the log of public outreach and involvement activities undertaken to ensure that minority and low-income people had a meaningful access to these activities.

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

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

3. Annual review of Title VI program

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

4. Dissemination of information related to the Title VI program

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

5. Resolution of complaints

Any individual may exercise his or her right to file a complaint if that person believes that he, she or any other program beneficiaries have been subjected to unequal treatment or discrimination in the receipt of benefits/services or prohibited by non-discrimination requirements. The Arc of Harrisonburg and Rockingham 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 joint responsibility of the Director of Support Services and the Transportation Director.

8. Title VI clauses in contracts

In all federal procurements requiring a written contract or Purchase Order (PO), **The Arc of Harrisonburg and Rockingham's** contract/PO will include appropriate non-discrimination clauses. The Title VI Manager will work with the Finance Director who is responsible for procurement contracts and PO's to ensure appropriate non-discrimination clauses are included.

VII. 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, The Arc of Harrisonburg and Rockingham shall disseminate this information to the public by posting a Title VI notice on the agency's website and in public areas of the agency's office(s), including the reception desk, meeting rooms, in federally-funded vehicles, etc. The following Sample Public Notice is to be included as APPENDIX A- Title VI Notice to the Public; List of Locations and displayed in your vehicles and facilities. Place Notice on agency letterhead:

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 Arc of Harrisonburg and Rockingham 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 **The Arc of Harrisonburg and Rockingham** or otherwise being discriminated against because of your race, color, national origin, gender, age, or disability, our contact information is:

Heather Denman Executive Director The Arc of Harrisonburg and Rockingham 620 Simms Avenue Harrisonburg, VA 22802 540-437-9214 excdire@hrarc.org

NOTE: As part of Title VI requirements, sub-recipients are also required to maintain a list of locations where their Title VI Notices have been posted or displayed.

SEE APPENDIX A-Title VI Notice to the Public

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

VIII. 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 **The Arc of Harrisonburg and Rockingham** 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 Arc of Harrisonburg and Rockingham includes the following language on all printed information materials, on the agency's website, in press releases, in public notices, in published documents, and on posters on the interior of each vehicle operated in passenger service:

The Arc of Harrisonburg and Rockingham 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 The Arc's nondiscrimination policies and procedures, or to file a complaint, please visit the website at www.hrarc.org or contact Heather Denman, Executive Director at 620 Simms Ave., Harrisonburg, VA 22802.

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 *The Arc's* brochures.

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 **The Arc of Harrisonburg and Rockingham**, 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).
 - 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?)
 - c. The complaint shall be submitted to **The Arc of Harrisonburg and Rockingham** Title VI Manager at 620 Simms Avenue, Harrisonburg, VA 22802 **or emailed to execdir@hrarc.org**
 - d. Complaints received by any other employee of **The Arc of Harrisonburg and Rockingham** will be immediately forwarded to the Title VI Manager.
 - e. 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 **Director of Support Services** 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 Arc of Harrisonburg and Rockingham's** board of directors.
 - 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 board of directors, DRPT, and, if appropriate, **The Arc of Harrisonburg and Rockingham's** legal counsel.
12. The Title VI Manager will send a letter to the complainant notifying them of the outcome of the investigation. If the complaint was substantiated, the letter will indicate the course of action that will be followed to correct the situation. If the complaint is determined to be unfounded, the letter will explain the reasoning, and refer the complainant to DRPT in the event the complainant wishes to appeal the determination. This letter will be copied to DRPT.
13. A complaint may be dismissed for the following reasons:
 - a. The complainant requests the withdrawal of the complaint.
 - b. An interview cannot be scheduled with the complainant after reasonable attempts.
 - c. The complainant fails to respond to repeated requests for additional information needed to process the complaint.
14. DRPT will serve as the appealing forum to a complainant that is not satisfied with the outcome of an investigation conducted by **The Arc of Harrisonburg and Rockingham**. 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](#)

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 [Name of Agency] 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.

[Name of Agency] 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.

[Name of Agency] 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.

The Arc of Harrisonburg and Rockingham is not a transit operator and does not provide public transportation. Transportation is provided to consumers who apply for services with the agency, are referred by the Community Services Board (CSB) and have been approved for Medicaid Waiver Supports.

NOTE: FTA has developed a Circular, 4703.1, “Environmental Justice Policy Guidance for Federal Transit Administration Recipients,” that includes many examples of effective strategies for engaging minority and low-income populations. FTA Chap. III-6 FTA C 4702.1B encourages recipients to review that Circular for ideas when developing their public engagement strategy.

A sample of effective public outreach practices follows. It is possible that a private nonprofit agency may not have to employ many or any of these practices, but you must document this if such is the case.

SOME OF THOSE EFFECTIVE PUBLIC OUTREACH PRACTICES INCLUDES:

- 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.

[SEE APPENDIX E-Summary of Outreach Efforts](#)

IX. LANGUAGE ASSISTANCE PLAN FOR PERSONS WITH LIMITED ENGLISH PROFICIENCY (LEP)

SAMPLE PLAN FOR SERVING PERSONS WITH LIMITED ENGLISH PROFICIENCY (LEP)

The model provided below is designed to address FTA-specific requirements.]

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 *The Arc of Harrisonburg and Rockingham* is based on FTA guidelines.

As required, **The Arc of Harrisonburg and Rockingham** developed a written LEP Plan (below). Using 2010 and American Community Survey (ACS) Census data, **The Arc of Harrisonburg and Rockingham** 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 (2011-2015)

Data from the U.S. Census Bureau's American Community Survey (ACS) were obtained through www.census.gov by The Arc of Harrisonburg and Rockingham's service area.

The agency's service area includes a total of 8,393 (6.86%) persons with Limited English Proficiency (those persons who indicated that they spoke English less than

“very well,” in the 2011-2015 ACS Census). The 2011-2015 ACS data was used due to the lack of LEP by language group data for the 2012-2016 ACS estimates.

Information from the 2011-2015 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. **Figure 1**

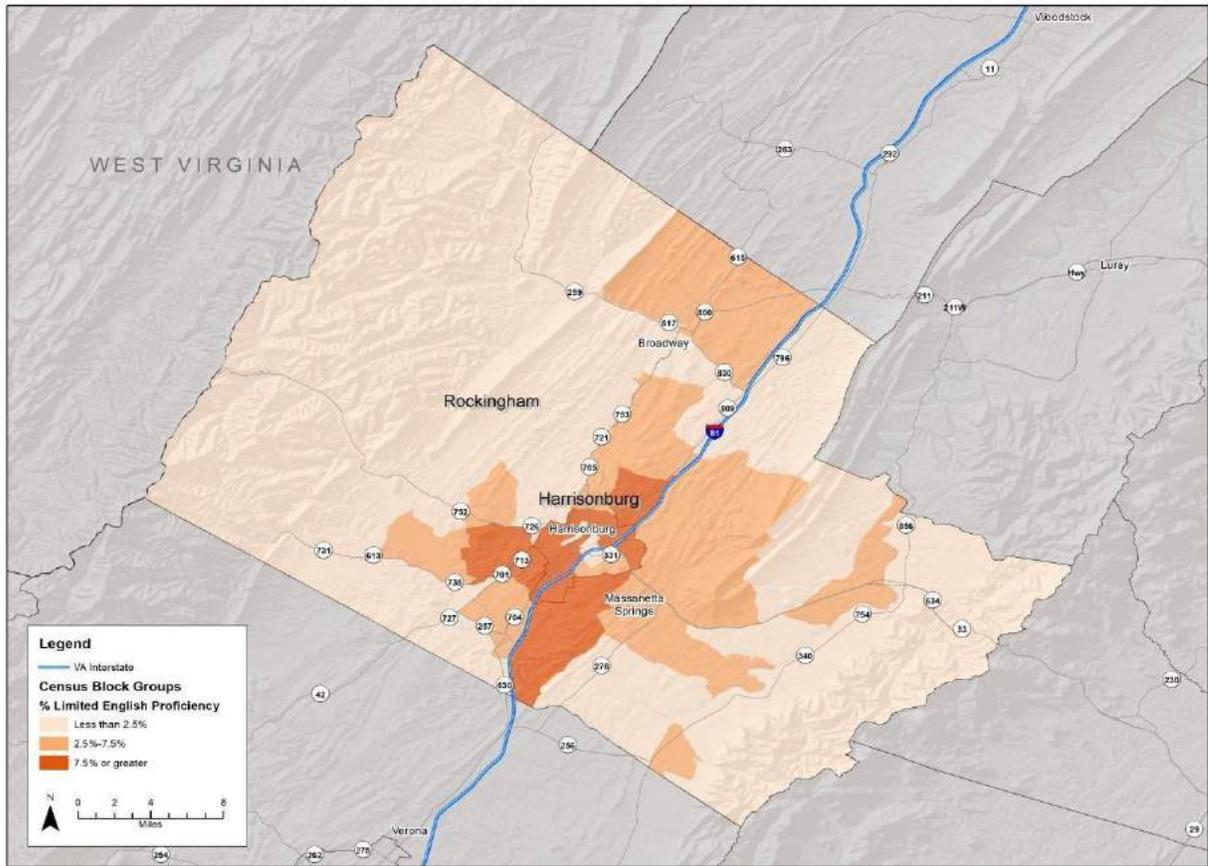


Figure 1 maps the percentage of LEP individuals by Census Block Group.

There are more significant percentages of LEP individuals in Harrisonburg than in the surrounding areas of Rockingham County. The Arc of Harrisonburg and Rockingham only provides transportation services to adults with intellectual disabilities which represents 3% of the total population. 85% of consumers reside in Rockingham County.

Table 1 - LEP Individuals by Language Spoken

Harrisonburg City			
Language	Number of LEP Population	Percent of County Population Speaking Language	Percent of LEP Population Speaking Language
Spanish or Spanish Creole	5,755	4.71%	68.57%

Russian	609	0.50%	7.26%
Arabic	435	0.36%	5.18%
Chinese	372	0.30%	4.43%
African languages	313	0.26%	3.73%
Other Indo-European languages	259	0.21%	3.09%
Other Slavic languages	114	0.09%	1.36%
Serbo-Croatian	89	0.07%	1.06%
Korean	70	0.06%	0.83%
Italian	69	0.06%	0.82%
Japanese	54	0.04%	0.64%
Urdu	53	0.04%	0.63%
Vietnamese	48	0.04%	0.57%
Hindi	36	0.03%	0.43%
French	25	0.02%	0.30%
Portuguese or Portuguese Creole	15	0.01%	0.18%
Gujarati	14	0.01%	0.17%
Other Pacific Island languages	12	0.01%	0.14%
Tagalog	11	0.01%	0.13%
Scandinavian languages	10	0.01%	0.12%
Greek	9	0.01%	0.11%
Mon-Khmer	9	0.01%	0.11%
Hungarian	7	0.01%	0.08%
Other Indic languages	5	0.00%	0.06%
Total LEP Population	8,393	6.86%	
Total City Population	122,312		

[Note: if any of these categories represents over 5% or 1,000 persons whichever is less, you should explore the individual languages in the category to determine whether any specific language meets this threshold.]

It is noted that no language is spoken exclusively by over 5% of the total population. The most spoken language group among LEP individuals is Spanish or Spanish Creole (5,755) which surpasses the 1000 persons in the total population threshold. No other language group surpasses the Safe Harbor Provision. As noted above, The Arc of Harrisonburg and Rockingham provides transportation services to a targeted subset of the general population: persons with intellectual disabilities, representing approximately 3% of the total population.

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

[Provide a summary of findings based on relevant (if anecdotal) information from agency staff, including the LEP persons' native language, how successful the agency has been in communicating with LEP persons, and common questions directed to the agency by LEP persons. Also, review any available records on the number of hits it receives on its non-English web pages or requests for interpreters at public meetings or results of ridership surveys that capture the experiences of LEP persons.]

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

- Contact with vehicle operators; **None to date**
- Calls to The Arc of Harrisonburg and Rockingham's customer service telephone line; **None to date**
- Visits to the agency; **None to date**
- Access to the agency's website; None to date, however The Arc of Harrisonburg and Rockingham does not currently have non-english web-pages.
- Attendance at community meetings or public hearings hosted by **The Arc of Harrisonburg and Rockingham; None to date and therefore no requests for translators**

The Arc of Harrisonburg and Rockingham currently serves one English as a Second Language Arabic speaker who is English proficient. The Arc of Harrisonburg and Rockingham 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 will attempt to identify their language and keep records on contacts to accurately assess the frequency of contact. To assist in language identification, we have available a language identification flashcard developed by the U.S. Census.

(<http://www.lep.gov/ISpeakCards2004.pdf>). This will be employed in the event of an interaction with LEP individuals in order to determine the translation services needed.

Information from Community Organizations that Serve LEP Persons

To supplement the Census, education, and labor department data, **The Arc of Harrisonburg and Rockingham** conducted community outreach to the following organizations that work with LEP populations:

- School systems; Harrisonburg City and Rockingham County Public Schools (meetings, email, telephone, distribution of information). The primary concern of Rockingham County Schools is when Special Education students graduate, they are often unable to access transportation to get to employment.
- Community organizations: United Way and United Way partner agencies (community meetings) ongoing information sharing regarding community needs and who can address those needs, requested referrals; Healthy Community Council (HCC): The Arc of Harrisonburg and Rockingham serves on the Steering Committee. The primary goal of the committee is to improve transportation services in our locality. We (HCC) received a planning grant to explore access to healthcare for LEP, low-income and disability communities and have had several community work sessions to problem solve and explore options.
- State and local governments; Community Services Board (meetings). CSB concurred that there is little demand for I/DD services from the LEP population
- Religious organizations; Asbury United Methodist (meetings)
- Legal aid entities. Blue Ridge Area Legal Aide (meetings) Requested that they refer any families with a child with I/DD.

[Note: Describe method of contact (telephone interviews, written or online surveys, outreach presentation at the organization, community meetings, etc.) and information obtained. [You could discuss the services your agency provides and seek feedback from the organization on the size of the population it serves, the transportation and other needs of the population, any demographic trends among this population, and effect ways to obtain input from this population].

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

The Arc of Harrisonburg and Rockingham has not yet experienced serving and communicating with LEP persons as there has been no demand.

The following are the most critical services provided by **The Arc of Harrisonburg and Rockingham** for all consumers, including future LEP persons.

- Safety and security awareness instructions

- Emergency evacuation procedures
- Learning public transit services, including reduced fare application process
- Arranging for paratransit services
- Services targeted at low income persons
- To and from home transportation
- Transportation for the purposes of community engagement and exploration

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

Costs

- *[List these along with associated costs. Include costs associated with translating documents, contracting with language interpreters, producing pictographs, installing multilingual technology, and other language assistance measures your agency is taking or plans to implement.]*
- *[Also estimate the number of staff and percentage of staff time that is associated with providing language assistance.]*

To date, we have not had any need for language assistance and therefore no staff time has been associated with providing language assistance. The following language assistance measures are currently made available by **The Arc of Harrisonburg and Rockingham** and are available at no or little cost should the need arise:

- 1) To assist in language identification, The Arc has a language identification flashcard developed by the U.S. Census. (<http://www.lep.gov/ISpeakCards2004.pdf>).
- 2) A magnetic board schedule for daily community engagement activities utilizes magnetized photos of the staff team leader, each of the 3 consumers who make up the team, the locations they will visit, and the vehicle they will use for transportation. The board allows individuals who are not able to read, or unable to read English, to visualize where they are going, what they will be doing, with whom, and how they are getting there. Annually, on the United Way Day of Caring, volunteers furnish magnetic paint and repaint the scheduling board. Magnetic backings for the photographs were purchased in bulk and printing of photos is done in-house at little cost.
- 3) Spanish speaking employees in the Lucy F. Simms Continuing Education Center, where The Arc is located, are accessible and willing to translate if needed.
- 4) Contacting the LEP consumers Case Manager at the Community Services Board who would be proficient in the individual's language.

The following additional services are needed to provide meaningful access:

- 1) Based on the analysis of demographic data, The Arc has determined that adding web-pages in Spanish would allow us to measure interest in our services by the most significant LEP population in our community. The current budget does not have a line item devoted to language assistance expenses. In-kind web and

translation assistance will be sought through local universities and colleges (James Madison and Eastern Mennonite Universities, and Bridgewater College) or United Way volunteers.

- 2) Should the need for on-site or remote language services arise, The Arc will seek volunteers and make every effort to verify that they provide competent interpretation service and will be trained on their role within the organization.
- 3) Transportation and other policies and procedures will be translated into Spanish. Volunteer translation services will be sought through local universities and colleges.
- 4) A community needs assessment will be employed to identify the reasons that LEP families are not seeking services and supports for their family members with intellectual and developmental disabilities. The assessment would try to ascertain the barriers that prevent families from seeking services and supports.

Resources

An available budget that could be devoted to additional language assistance expenses is severely limited due to recent changes in Medicaid reimbursements rates in the Commonwealth. The changes have decreased rates for center-based care and do not adequately support community engagement services. Day Support providers across the state, including The Arc of Harrisonburg and Rockingham, are operating at significant deficits now and for the foreseeable future. Any supports for enhancing LEP services must be volunteer or in-kind.

The Arc of Harrisonburg and Rockingham has not requested additional grant funding for language assistance at this time.

The Arc may have access to language assistance products that have been developed and paid for by local, regional, or state government agencies and who may also have bilingual staff that could provide language assistance on an ad hoc or regular basis. These resources will be inventoried and taken into consideration as part of our assessment of total resources available.

The Arc will be able to establish arrangements with qualified community volunteers to provide written or oral language translation through United Way's Get Connected website, which allows agencies to post volunteer positions. Although these volunteers will provide their services free of charge, The Arc will verify that they can provide competent interpretation service and train them on their role within the agency. Volunteer activity is inventoried through the Get Connected website.

Other potential cost saving measures include pooling resources and standardizing documents to reduce translation needs, and centralizing interpreter and translator services to achieve economies of scale. As a chapter of The Arc of VA and The Arc of The US, we will seek access to documents that have been translated by our sister chapters or parent organization.

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:

- Translator and interpreter volunteers from the local universities, colleges and United Way
- Interpreters called upon from other agency staff in the building (Boys & Girls Clubs, Harrisonburg Parks and Recreation) or the CSB case managers.
- Access to information and materials translated by other chapters of The Arc in the state or in other states, or other non-profits in the local community

LEP Implementation Plan

Through the four-factor analysis, **The Arc of Harrisonburg and Rockingham** has determined that the following types of language assistance are most needed and feasible and will be implemented within the life of the plan:

- Translation of vital documents and web-pages into Spanish. Documents include:
 - Emergency preparedness brochure
 - Passenger policies and procedures
 - Medical and other Release forms
- Recruit standby volunteers with competency in spoken and written Spanish, or other presenting language. as appropriate for our service area and needs.

Staff Access to Language Assistance Services

Agency staff who come into contact with LEP persons can access language services by:

- offering the individual a language identification flashcard,
- having a supply of translated documents on hand,
- referring a call to a CSB caseworker or getting assistance from a bilingual person onsite.

- having a list of available language assistance services (ie phone translation) 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:

The call will be transferred to a bilingual staff, or volunteer. Failing on-site availability, the individual's Community Services Board Case Manager will be contacted and asked to contact them and then communicate the individual's needs to the agency. Senior staff will be provided with a list of current available language assistance services.

Trip planning/transportation will be addressed as part of the individual's intake procedure and ISP (Individualized Support Plan) at which time they will be accompanied by their case manager who will be proficient in their spoken language.

Responding to Written Communications from LEP Persons

The following procedures are followed when responding to written communications from LEP persons:

Online translation services, or the services of translators through the universities and colleges, or the CSB Case Manager will be utilized to respond to any written communication.

Responding to LEP Individuals in Person

The following procedures are followed when an LEP person visits our day support program and/or administrative office:

- The language identification flashcard will be used if the language used by the speaker is not easily identifiable.
- Bilingual CSB caseworkers, volunteers or staff will be sought out in person to help with the translation or communicate information directly if qualified to do so.
- If no one is on site, telephone contact with a CSB caseworker or other community agency serving the LEP population will be contacted to translate over speaker phone.

Responding to LEP Individuals in Transit:

The following procedures will be followed by operators when an LEP person has a question on board an **Arc of Harrisonburg and Rockingham** vehicle:

If a consumer has a question on board a vehicle that the driver or fellow passengers cannot understand to answer, the driver will park the vehicle in a safe location and make a phone call to The Arc for help in translating the question and providing the response.

Staff Training

As noted previously, all staff of **The Arc of Harrisonburg and Rockingham** 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 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 consumers, as well as their supervisors and all management staff, receive annual refresher training on policies and procedures related to assisting LEP persons.

Online training through *Relias* sed staff training software is available to all employees in:

- 1) Cultural Awareness and Older Adults
- 2) Cultural Competence and Sensitivity
- 3) Cultural Diversity

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 in our vital documents.
- through signs posted on our vehicles and in our Day Support and administrative offices.
- through ongoing outreach efforts to community organizations, schools, and religious organizations.

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 of Harrisonburg and Rockingham** will solicit feedback on the effectiveness of language assistance provided and unmet needs. In addition, we will conduct periodic community meetings, internal meetings with staff who assist LEP persons, and reviews of updated Census data, to ensure the adequacy and quality of the language assistance provided and determine changes to LEP needs.

In preparing the triennial update of this plan, **The Arc of Harrisonburg and Rockingham** 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, **The Arc of Harrisonburg and Rockingham** 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 of Harrisonburg and Rockingham** will attempt to identify the most cost-effective approaches.

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

X. 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.”

The Arc of Harrisonburg and Rockingham is a membership organization and has an elected board of directors.

1. Please provide a description of your selection process, including recruitment efforts made to encourage the participation of minorities on such committee(s)

The Arc of Harrisonburg and Rockingham has historically recruited board members who have a connection to a person with a disability or who work or have worked in the developmental disability field. As a result, the board reflects those we serve. There is not a significant minority representation on the board of directors. An effort is being made to recruit board members with diversity in:

- 1) Expertise (business management, marketing, finance etc.
- 2) Organization Size: major corporations, small business, sole proprietor etc.
- 3) Race, ethnicity, etc.

The Executive Director of The Arc of Harrisonburg and Rockingham has joined the Diversity Committee of the Harrisonburg Rockingham Chamber of Commerce in order to recruit minority business people to the board. We intend to increase the number of board members by 5 and will mindfully recruit at least 3 persons who represent minorities.

2. Please provide a table(s) depicting the racial breakdown of the membership of those committees

SEE APPENDIX F- TABLE MINORITY REPRESENTATION ON COMMITTEES BY RACE

XI. 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.

THE FOLLOWING DOCUMENTS WERE SCANNED AND SUBMITTED AS A SEPARATE ATTACHMENT:

APPENDIX A - TITLE VI NOTICE TO THE PUBLIC

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

APPENDIX C - TITLE VI COMPLAINT FORM

Appendix D - Investigations, Lawsuits and Complaints Document

Investigations, Lawsuits and Complaints

	Date (Month, Day, Year)	Summary (include basis of complaint: race, color or national origin)	Status	Action(s) taken
Investigations	None			
Lawsuits	None			
Complaints	None			

APPENDIX E - SUMMARY OF OUTREACH EFFORTS

The Arc of Harrisonburg and Rockingham does not recruit participants whom we refer to as consumers and therefore does not do outreach. As a licensed Day Support Provider with the Department of Behavioral Health and Developmental Services we receive Medicaid Waiver qualified referrals from the Community Services Board. Following a tour and meeting consumers make the decision whether they will attend The Arc or another area day support provider. Upon providing service, The Arc receives a Medicaid Waiver reimbursement through the Department of Medical Assistance Services who administers Medicaid. The Arc provides direct support services, including transportation, to our consumers.

The Arc's outreach efforts to date have been focused on improved and collaborative transportation efforts for people with I/DD specifically and other underserved population in general.

Recognizing the growth of the LEP population in Harrisonburg and Rockingham County, The Arc recognizes that, although we have not had inquiries or provided services to LEP individuals, inquiries and enrollment are a possibility in the future. To that end, The Arc will reach out to LEP service providers to determine if there are barriers to service for individuals with I/DD in the LEP community. Outreach efforts will include:

Harrisonburg City Schools Special Education Director

Rockingham County Schools Special Education Director

New Bridges Immigrant Resource Center

Church World Service Refugee Resettlement

The Harrisonburg Immigration and Refuge Office

Skyline Literacy

JMU NETT

Shenandoah Valley Migrant Education Program

Community Health Interpreter Service

Community Services Board

Efforts will result in an assessment of the need for I/DD services within the LEP community and if there is a need, develop a collaborative approach to ensuring that families are made aware of the services and supports and have assistance in applying for them.

APPENDIX F -TABLE MINORITY REPRESENTATION ON COMMITTEES BY RACE

Black or African American	White/Caucasian	Latino/Hispanic	American Indian or Alaska Native	Asian	Native Hawaiian or other Pacific Islander	Other <i>*Note</i>	Totals
0	8	0	1	0	0	1*	10

**Note – Other races reported: Lithuania, Ukrainian, and Polish *Self-Advocate – A Person with a developmental disability*