

Danville–Pittsylvania Community Services

Title VI Plan and Procedures

Title VI of the Civil Rights Act of 1964



July 1, 2021

TABLE OF CONTENTS

PAGE

I.	Introduction_____	2
II.	Overview of Services_____	3
III.	Policy Statement and Authorities_____	4
IV.	Nondiscrimination Assurance to DRPT _____	6
V.	Plan Approval Document _____	7
VI.	Organization and Title VI Program Responsibilities Document _____	8
VII.	Procedures for Notifying the Public of Title VI Rights_____	13
	And how to File a Complaint	
VIII.	Language Assistance Plan for Persons with Limited_____	21
	English Proficiency (LEP)	
IX.	Monitoring Title VI Complaints_____	28

APPENDICES

- A Title VI Notice to the Public
- B Title VI Notice to the Public List of Locations
- C Title VI Complaint Form
- D Investigations, Lawsuits and Complaints Document
- E Summary of Outreach Efforts

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 Danville-Pittsylvania Community Services (DPCS) incorporates nondiscrimination policies and practices in providing services to the public. DPCS' 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

Danville-Pittsylvania Community Services' mission is to provide the highest quality of mental health, developmental, substance use, and prevention services and supports to the citizens of Danville and Pittsylvania County. These services and supports are focused upon unlocking each individual's potential for self-determination, empowerment, recovery, resiliency and health, and the highest possible level of participation in all aspects of community life. Behavioral Health Services provides crisis, jail/juvenile detention, and support services; child and adult psychiatry, substance abuse treatment, and case management. Developmental Services provides case management, child and adolescent services, residential services, and day services. Prevention Services provides parenting, youth leadership, substance abuse prevention, anger management/violence prevention, and life skills.

III. POLICY STATEMENT AND AUTHORITIES

Title VI Policy Statement

Danville-Pittsylvania Community Services 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 DPCS Director of Developmental Disabilities (Title VI Program Contact Person) 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.



01/28/2022

James F. Bebeau, LPC, Executive Director

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 the Virginia Department of Rail and Public Transportation (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, DPCS 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, DPCS confirms to DRPT the Agency's commitment to nondiscrimination and compliance with federal and state requirements

V. PLAN APPROVAL DOCUMENT

The Title VI Implementation Plan 2021 – 2024 was reviewed and approved by the Danville-Pittsylvania Community Services' Board of Directors during the June 24, 2021 DPCS Board Meeting.

I hereby acknowledge the receipt of Danville-Pittsylvania Community Services Title VI Implementation Plan 2021-2024. I have reviewed and approve the Plan. I am committed to ensuring that no person is excluded from participation in, or denied the benefits of transit services on the basis of race, color, or national origin, as protected by Title VI according to Federal Transit Administration (FTA) Circular 4702.1B Title VI requirements and guidelines for FTA sub-recipients.



01/28/2022

Signature of Authorizing Official

Date

NAME James F. Bebeau, LPC

TITLE Executive Director

Danville-Pittsylvania Community Services

VI. ORGANIZATION AND TITLE VI PROGRAM RESPONSIBILITIES

Danville-Pittsylvania Community Services' Director of Developmental Disabilities 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.

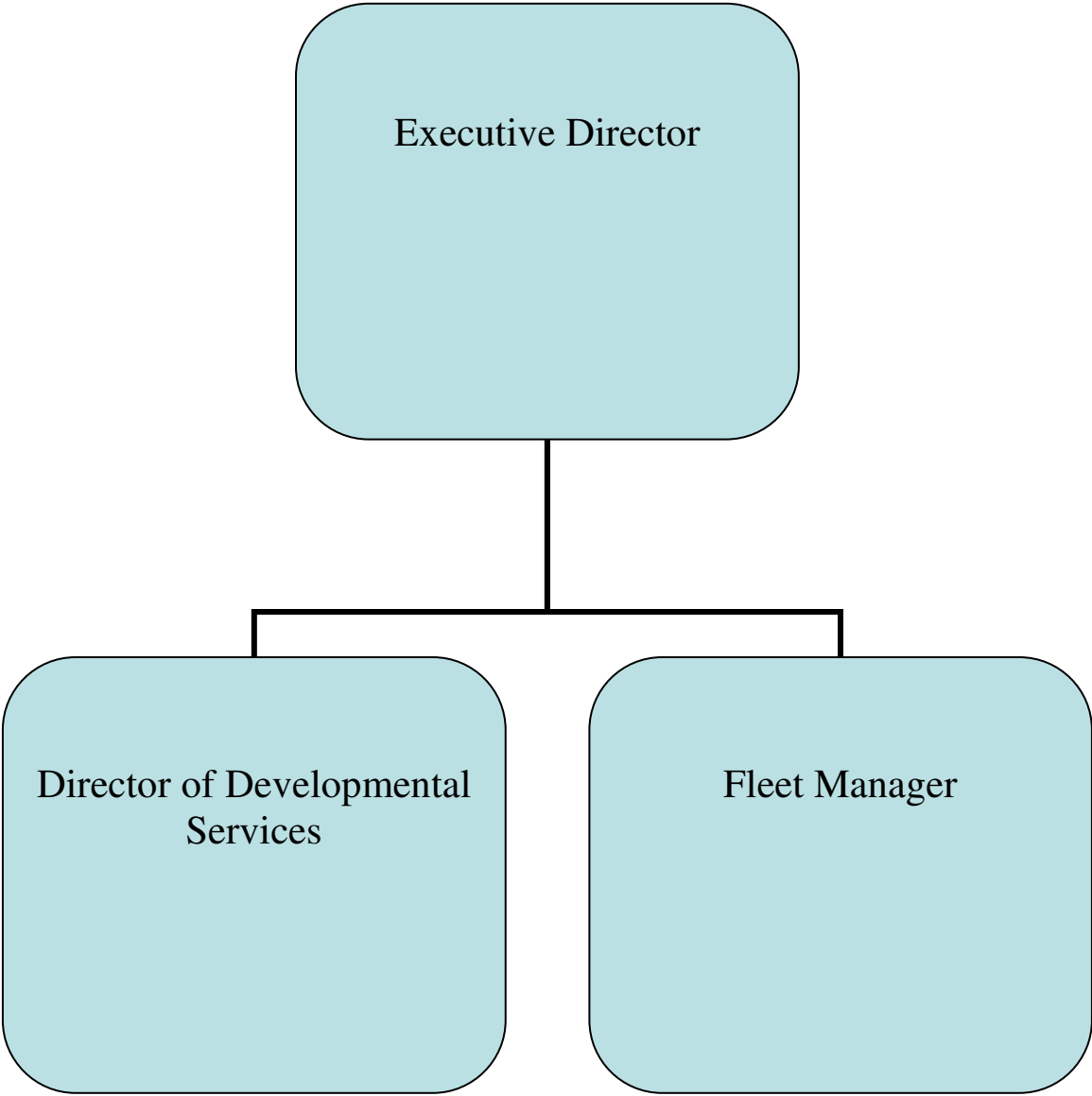
Overall Organization for Title VI

The Director of Developmental Services and staff are responsible for coordinating the overall administration of the Title VI program, plan, and assurances, including complaint

Detailed Responsibilities of the Director of Developmental Services as the Title VI Contact Person

The Director of Developmental Services 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 Director of Developmental Services 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, Danville-Pittsylvania Community Services 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, Danville-Pittsylvania Community Services 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. Danville-Pittsylvania Community Services 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 the Title VI and instruction 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 Director of Developmental Services 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. Danville-Pittsylvania Community Services 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 Director of Developmental Services 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 annually. 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.

8. Title VI Clauses in Contracts

In all federal procurements requiring a written contract or Purchase Order (PO), Danville-Pittsylvania Community Services' contract/PO will include appropriate non-discrimination clauses. The Director of Developmental Services will work with the Finance Department who is/are 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, Danville-Pittsylvania Community Services shall disseminate this information to the public by posting a Title VI notice on the Agency's website and in public areas of the Agency's office(s), including the reception desk, meeting rooms, in federally-funded vehicles, etc.

SEE APPENDIX A – 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 Danville-Pittsylvania Community Services 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.

Danville-Pittsylvania Community Services 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:

Danville-Pittsylvania Community Services 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 Danville-Pittsylvania Community Services' nondiscrimination policies and procedures, or to file a complaint, please visit the website at www.dpcs.org or contact the Director of Developmental Services, 245 Hairston Street, Danville, VA 24540.

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 the Agency's facilities, and are also included within Danville-Pittsylvania Community Services brochures.

SEE APPENDIX C – Title VI Complaint Form

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

Should any Title VI investigation be initiated by FTA or DRPT, or any Title VI lawsuits are filed against Danville-Pittsylvania Community Services, 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 Director of Developmental Services. 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 Danville-Pittsylvania Community Services' Director of Developmental Services, at 245 Hairston Street, Danville, VA 24540.

- e. Complaints received by any other employee of Danville-Pittsylvania Community Services will be immediately forwarded to the Director of Developmental Services.
 - 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 Director of Developmental Services. Under these circumstances, the complainant will be interviewed, and the Developmental Services Division's Administrative Assistant will assist the complainant in converting the verbal allegations to writing.
2. Upon receipt of the complaint, the Director of Developmental Services will immediately:
 - a. notify DRPT (no later than 3 business days from receipt)
 - b. notify Danville-Pittsylvania Community Services' Executive Director, and
 - c. ensure that the complaint is entered in the complaint database
 3. Within 3 business days of receipt of the complaint, the Director of Developmental Services 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 Director of Developmental Services 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 Director of Developmental Services will determine, based on relevance 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 Director of Developmental Services 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 Director of Developmental Services 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, Danville-Pittsylvania Community Services' legal counsel.
12. The Director of Developmental Services 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 Danville-Pittsylvania Community Services. 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.

The 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 Danville-Pittsylvania Community Services utilizes effective means of providing information and receiving public input on the 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) person 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 component 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 objective to ensure accountability and a means for improving over time.

Danville-Pittsylvania Community Services 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.

Danville-Pittsylvania Community Services 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 the 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 INCLUDES:

1. Scheduling meeting at times and locations that are convenient and accessible for minority and LEP communities.
2. Employing different meeting sizes and formats.
3. 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.
4. 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.
5. Providing opportunities for public participation through means other than written communication, such as personal interview or use of audio or video recording devices to capture oral comments.
6. Language translations can be available to better communicate.

SEE APPEDIX 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 a LEP program meets objectives set forth in Title VI of the Civil Rights Act and Executive Order 13116, 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 Danville-Pittsylvania Community Services is based on FTA guidelines.

As required, DPCS developed a written LEP Plan (below). Using 2019 American Community Survey (ACS) Census data, DPCS 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

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

U.S. Census Data – American Community Survey (2019) Data from the U.S. Census Bureau's American Community Survey (ACS) was obtained for DPCS' service area. The Agency's service area includes a total of 97,347 people. Of the total population, 1.74% have Limited English Proficiency (those persons who

indicated that they spoke English “not well” in the 2019 ACS Census.) It is noted that there are relatively low number of LEP persons in the service area.

Language Spoken at Home and English-Speaking Ability for the Population by County and City (ACS 2019)									
	Total Population		Speak non-English at Home						Total Population
	Total Pop.	Speak English at Home	Total Pop.	Percent	Total that Speak English “very well”	Percent that Speak English “very well”	Total that Speak English less than “very well”	Percent that Speak English less than “very well”	Percent Pop. that speak English less than “very well”
Pittsylvania County	58,696	56,684	2,012	3.4%	1,176	58.4%	836	41.6%	1.42%
Danville City	38,651	36,641	2,010	5.2%	1,149	57.2%	861	42.8%	2.23%
TOTAL AREA	97,347	93,325	4,022	4.1%	2,325	57.8%	1,697	42.2%	1.74%

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

Danville-Pittsylvania Community Services reviewed the relevant benefits, services, and information provided by the Agency and determined the extent to which LEP persons come into contact with these functions through the following channels:

- Contact with transit vehicle operators;
- Contact with transit station managers;
- Calls to DPCS’ general telephone line;
- Visits to the Agency’s Main Office;
- Access to the Agency’s website;
- Attendance at community meetings or public hearings hosted by DPCS;
- Contact with the Agency’s ADA complementary paratransit system (including applying for eligibility, making reservations, and communicating with drivers). *This channel is not relevant to DPCS’ transportation services.*

At this time, all individuals with Developmental Disabilities utilizing DPCS’ Federal Transportation Administration Section 5310 transportation services are

English speaking. These individuals are non-traditional LEP due to their cognitive disabilities.

DPCS 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. Interpreters are available in our area.

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

Danville-Pittsylvania Community Services provides an array of programs, activities and services. Behavioral Health Services' programs include crisis services, jail/juvenile detention services, child and adult psychiatry, substance use treatment, case management, and support services. Developmental Services provides case management, child and adolescent services, residential services, and day services. Prevention Services provides parenting, youth leadership, substance abuse prevention, suicide prevention, anger management/violence prevention, and life skills.

Information about the following critical services are provided by DPCS for all individuals enrolled in services, including LEP persons:

- Safety and security awareness instructions
- Emergency evacuation procedures
- Paratransit services
- Services targeted at low income persons

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

The following language assistance measures currently are being provided by DPCS.

Resources for sign language and foreign language interpretation include Communication Access Partners and Language Line. Sign Language classes are available to the staff of the Developmental Services Division through a local instructor. Currently very little time is associated with the provision of language assistance.

The total amount DPCS has paid for sign interpreting and Spanish interpreting for the time period of July 1, 2019 – June 30, 2020 is \$10,444.95. DPCS does not anticipate an increase in costs at this time. Based on the analysis of

demographic data and contact with community organizations and LEP persons, DPCS has determined that additional services are not needed to provide meaningful access at this time; however, in the event the need is identified, appropriate resources would be acquired.

Resources:

The available budget that could currently be devoted to language assistance expenses is \$12,123.00 in a twelve month timeframe. This amount is likely to be stable over time.

In-kind assistance may be available through community organizations, other city or county departments, other transit agencies who may be able to partner for language assistance services. Other potential cost savings measures include telephonic interpretation services and centralizing interpreter and translator services. Bilingual staff could provide language assistance on an ad hoc or regular basis.

Based on the available resources, the following language assistance measures are feasible and appropriate for our Agency at this time: sign interpreting and Spanish interpreting both in person and virtually, translation of documents into preferred language.

The population of focus served by DPCS' Developmental Services Division is comprised of numerous individuals who due to their cognitive disability could be considered non-traditional LEP. Due to their limited English proficiency, technology and translators are often used to assist them. Computers with translation applications are used. To accommodate individuals with low literacy, people who are trained in sign language and who are interpreters are utilized; communication is done at a level the individual can hopefully understand. If an individual is profoundly or severely developmentally disabled, they are assigned an authorized representative for serious decision making; communication devices and boards are used; caregivers read body language and gestures to discern likes and dislikes.

LEP Implementation Plan

Through the four-factor analysis, DPCS has determined that the following types of language assistance are most needed and feasible:

- Translate vital documents into Spanish. Individualized Service Plans are translated for individuals when necessary. Agency-specific forms are in the process of being translated into Spanish. Vital documents are available online for certain Agency programs.

- Post signage in Spanish on Agency campuses.
- Attempt to hire bilingual staff with competency in spoken and a written foreign language is feasible. Human Resources records employees' ability to communicate in a foreign language.
- Continue to utilize Language Line Translation Services for telephone contacts and Communication Access Partners for face-to-face contacts as needed.
- Distribute a list of all language assistance services to all staff.

Staff Access to Language Assistance Services:

Agency staff who come into contact with LEP persons can access language services by having a supply of translated documents on hand. A call could be transferred to bilingual staff. A telephone menu allowing the customer to pre-select their language is feasible. All staff should 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 answers calls from the public respond to LEP persons as follows: Language Line Translation Services would be utilized.

Responding to Written Communications from LEP Persons:

If a written response to communications from LEP persons is needed, the following procedures would be followed: Language translation services such as those available on Microsoft Word would be used.

Responding to LEP Individuals in Person:

The following procedures are followed when an LEP person visits DPCS' customer service and administrative office: Language translation services (by phone or in person) would be used as needed.

Staff Training:

As noted previously, all DPCS 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.

Ongoing education will be provided to staff through workshops, training sessions, and conferences.

Providing Notice to LEP Persons:

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

- Title VI policy statement included on our vital documents.
- On DPCS' website
- Through signs posted on our vehicles and in our customer service and administrative offices.
- Through ongoing outreach efforts to community organizations and schools.
- Use of an automated telephone menu system in the most common languages encountered.
- Staffing a table with bilingual staff at community service events of interest to LEP groups.

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, DPCS will solicit feedback on the effectiveness of language assistance provided and unmet needs. In addition, we will conduct periodic surveys, focus groups, community meetings, internal meetings with staff who assist LEP persons, review of updated Census data, formal studies of the adequacy and quality of the language assistance provided, and determine changes to LEP needs.

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

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

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

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 planning, advisory, or similar body which is an integral part of the program."

Non-Elected Board Diversity

Members of Danville-Pittsylvania Community Services' Board of Directors are appointed by the governing body of the City of Danville, which is Danville City Council, and the governing body of Pittsylvania County, which is the Pittsylvania County Board of Supervisors. DPCS has no control over minority participation on its Board of Directors. Although the Agency tries to advocate for minority participation, it is the governing body's decision based on who submits applications and who they choose. This is the current racial breakdown on the Board:

African American – 5

Caucasian - 10

IX. Monitoring Title VI Complaints

As part of the complaint handling procedure, the Director of Developmental Services investigates possible inequities in service delivery for the route(s) or service(s) about which the complaint was filed. If inequities are discovered during this review, options for reducing the disparity are explored, and service changes are planned if needed.

In addition to the investigation following an individual complaint, the Director of Developmental Services 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

DANVILLE-PITTSYLVANIA COMMUNITY SERVICES

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).

Danville-Pittsylvania Community Services 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 Danville-Pittsylvania Community Services, or otherwise being discriminated against because of your race, color, national origin, gender, age, or disability, our contact information is:

Sara Craddock

Director of Developmental Services

Danville-Pittsylvania Community Services

245 Hairston Street

Danville, Virginia 24540

(434) 799-0456, ext. 3121

Appendix B

Title VI Notice to the Public

List of Locations

DANVILLE-PITTSYLVANIA COMMUNITY SERVICES

Main Office

245 Hairston Street

Danville, Virginia 24540

Ashlawn View

119 Ashlawn Drive

Danville, Virginia 24541

Bridge View Place

505 Keen Street

Danville, Virginia 24540

Day Services

103 Dewey Place

Danville, Virginia 24540

Harmony House
515 Rison Street
Danville, Virginia 24541

Mount Hermon Manor
4769 Franklin Turnpike
Danville, Virginia 24540

River View Place
504 Middle Street
Danville, Virginia 24540

Appendix C

Title VI Complaint Form

DANVILLE-PITTSYLVANIA COMMUNITY SERVICES

Section I:				
Name:				
Address:				
Telephone (Home):			Telephone (Work):	
Electronic Mail Address:				
Accessible Format Requirements?	Large Print		Audio Tape	
	TDD		Other	
Section II:				
Are you filing this complaint on your own behalf?			Yes*	No
*If you answered "yes" to this question, go to Section III.				
If not, 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
Section III:				
I believe the discrimination I experienced was based on (check all that apply):				
<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin				
Date of Alleged Discrimination (Month, Day, Year): _____				
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.				
_____ _____				
Section IV				

Please submit this form in person at the address below, or mail this form to:

Sara Craddock, MPH

Director of Developmental Services

Danville-Pittsylvania Community Services

245 Hairston Street

Danville, Virginia 24540

Appendix D

Title VI

Investigations, Lawsuits and Complaints

DANVILLE-PITTSYLVANIA COMMUNITY SERVICES

	Date (Month, Day, Year)	Summary (includes basis of complaint: Race, color or national origin)	Status	Action(s) taken
Investigations	N/A	N/A	N/A	N/A
1.				
Lawsuits	N/A	N/A	N/A	N/A
1.				
Complaints	N/A	N/A	N/A	N/A

1.				

Appendix E

Title VI Summary of Outreach Efforts

DANVILLE-PITTSYLVANIA COMMUNITY SERVICES

- A. Scheduling meetings at times and locations that are convenient and accessible for minority and LEP communities.

- B. Employing different meeting sizes and formats.

- C. 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.

- D. 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.

- E. 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.

Appendix F

Title VI Table of Minority Representation on Committees by Race

DANVILLE-PITTSYLVANIA COMMUNITY SERVICES

Committee	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
Board of Directors	5	10	0	0	0	0	0	15
% of Board of Directors	33%	67%	0	0	0	0	0	100%