
Title VI Plan and Procedures

Title VI of the Civil Rights Act of 1964



Adopted date:

January 27, 2022

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I. INTRODUCTION

Title VI of the Civil Rights Act of 1964 prohibits discrimination based on 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 STEPS, Inc. incorporates nondiscrimination policies and practices in providing services to the public. STEPS, Inc.'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

STEPS, Inc. is a private, not for profit, 501c(3) organization that has a footprint of services in eleven (11) counties in south central Virginia. These counties include:

- Amelia
- Appomattox
- Brunswick
- Buckingham
- Charlotte
- Cumberland
- Halifax
- Lunenburg
- Mecklenburg
- Nottoway
- Prince Edward

Services are provided with four (4) pillars of service which include:

1. Workforce development – job training and employment for citizens with disabilities, senior community services employment program, and workplace supports for TANF recipients
2. Economic development – commercial lines of business including recycling, and secure document shredding
3. Emergency services – homelessness prevention services, Dominion Energy Share, and alleviation of poverty
4. Education – Head Start and Early Head Start provider

STEPS, Inc. is also the designated Community Action Group for six (6) counties including:

- Amelia
- Buckingham
- Cumberland
- Lunenburg
- Nottoway
- Prince Edward

STEPS, Inc. provides transportation services to clients served by our organization. STEPS, Inc. transports all sixteen (16) Department for Aging and Rehabilitation Services employees who work in STEPS Recycling Center, Secure Document Destruction and Victoria Manufacturing Plant. These employees with disabilities would not be able to work without this service. The number of employees with disabilities is predicted to increase over the next year. There are twenty-five (25) citizens who receive Department of Social Services benefits currently enrolled in the STEPS Workplace Supports Program. This program provides job training and placement to TANF recipients with the goal of exiting the welfare roles.

STEPS, Inc. covers an eight (8) county area in the region so getting to employment sites and incumbent workers often requires long distance travel. STEPS, Inc. service area is large and mostly rural. Public transportation is very limited and without STEPS' transportation services, these individuals would not have access to employment-related services.

STEPS, Inc. has worked closely with other transportation providers to utilize collaborative resources when available. STEPS, Inc. provides matching funds to the Town of Blackstone to ensure the Piedmont Area Transit's Cumberland County to Farmville route continues to be operational. This provides transportation to STEPS, Inc. employees with employment barriers to get to and from work daily. It also provides transportation to an average of 163 riders monthly and covers over 6000 miles during the month. With the knowledge that Cumberland County was a public transportation island, STEPS, Inc. met a need through this partnership.

Transportation may also include, but is not limited to:

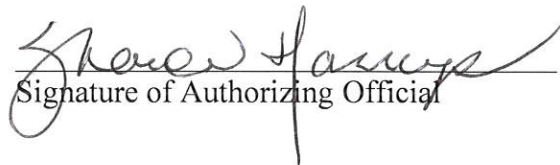
- Transportation related to employment: to/from job site; to/from job interviews, etc.
- Transportation to support services: medical/mental health appointments, Social Security, Social Services, and food pantry
- Transportation to an emergency housing shelter

III. POLICY STATEMENT AND AUTHORITIES

Title VI Policy Statement

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


Signature of Authorizing Official

01/27/2022
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, STEPS, Inc. submits a Nondiscrimination Assurance which addresses compliance with Title VI as well as nondiscrimination in hiring (EEO) and contracting (DBE), and nondiscrimination based on disability (ADA).

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

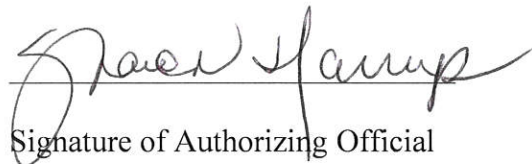
V. PLAN APPROVAL DOCUMENT

At the Board of Director's meeting on January 27, 2022, a motion was made by Bonnie Andrachek and seconded by Matthew Friedman to accept the STEPS Title VI Plan and Procedures Program as presented. Unanimous.

Cynthia A. Saunders

Vice President of Compliance and Evaluation

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


Signature of Authorizing Official

01-27-2022

DATE

Sharon Harrup, CEO

STEPS, Inc.

VI. ORGANIZATION AND TITLE VI PROGRAM RESPONSIBILITIES

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

Overall Organization for Title VI

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

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. Due to the separation of the duties each statement contains which staff person is responsible. Title VI responsibilities are as follows:

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

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, STEPS, Inc. 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, STEPS, Inc. 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. STEPS, Inc. will also maintain and provide to DRPT an annual basis, the log of public outreach and involvement activities undertaken to ensure that minority and low-income people had a meaningful access to these activities.

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

- A copy of any compliance review report for reviews conducted in the last three years, along with the purpose or reason for the review, the name of the organization that performed the review, a summary of findings and recommendations, and a report on the status or disposition of the findings and recommendations
- Limited English Proficiency (LEP) plan
- procedures for tracking and investigating Title VI complaints
- A list of Title VI investigations, complaints or lawsuits filed with the agency since the last submission
- A copy of the agency notices 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. STEPS, Inc. 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 Annual Title VI Program Review (item 3 above), the Title VI Manager will determine whether an update is needed.

7. Internal education

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

Title VI training is the responsibility of the Transportation Manager.

8. Title VI clauses in contracts

In all federal procurements requiring a written contract or Purchase Order (PO), STEPS, Inc.’s contract/PO will include appropriate non-discrimination clauses. The Title VI Manager will work with the Transportation Manager 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, STEPS, Inc. 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 has been put on company letterhead and posted.

Title VI of the Civil Rights Act of 1964 prohibits discrimination based on 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).

STEPS, Inc. is committed to ensuring that no person is excluded from participation in or denied the benefits of its transportation services based on 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 STEPS, Inc., or otherwise being discriminated against because of your race, color, national origin, gender, age, or disability, our contact information is:

Katie Rhodes
Transportation Manager
STEPS, Inc.
225 Industrial Park Road
Farmville, VA 23901
434-315-5909 x 14
krhodes@steps-inc.org

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.

Any individual, group of individuals, or entity that believes they have been subjected to discrimination prohibited by Title VI nondiscrimination provisions may file a written complaint with STEPS Inc.'s Vice President of Administration and Compliance. A formal complaint must be filed within 180 calendar days of the alleged occurrence or when the alleged discrimination became known to the complainant.

The complaint must meet the following requirements:

- a. Complaint shall be in writing and signed by the complainant(s).
- b. Include the date of the alleged act of discrimination (date when the complainant(s) became aware of the alleged discrimination; or the date on which that conduct was discontinued or the latest instance of the conduct).
- c. Present a detailed description of the issues, including names and job titles of those individuals perceived as parties in the complained-of incident.
- d. Allegations received by fax or e-mail will be acknowledged and processed, once the identity(ies) of the complainant(s) and the intent to proceed with the complaint have been established. The complainant is required to mail a signed, original copy of the fax or e-mail transmittal for STEPS, Inc. to be able to process it.
- e. Allegations received by telephone will be reduced to writing and provided to complainant for confirmation or revision before processing.
- f. A complaint form will be forwarded to the complainant for him/her to complete, sign, and return to STEPS, Inc. for processing.

Upon receipt of the complaint, the Vice President of Administration and Compliance will determine the jurisdiction, acceptability, and need for additional information as well as investigate the merit of the complaint. In cases where the complaint is against STEPS transportation, provided through funding from the Department of Rail and Public Transportation (DRPT), the Vice President of Administration and Compliance will contact DRPT, who will assume jurisdiction and investigate.

In order to be accepted, a complaint must meet the following criteria:

- a. The complaint must be filed within 180 calendar days of the alleged occurrence or when the alleged discrimination became known to the complainant.
- b. The allegation(s) must involve a covered basis such as race, color, or national origin.

c. The allegation(s) must involve a program or activity of a federal-aid recipient, subrecipient, or contractor.

A complaint may be dismissed for the following reasons:

- a. The complainant requests the withdrawal of the complaint.
- b. The complainant fails to respond to repeated requests for additional information needed to process the complaint.
- c. The complainant cannot be located after reasonable attempts.

Once STEPS, Inc. decides to accept the complaint for investigation, the complainant and the respondent will be notified in writing of such determination within seven (7) calendar days. The complaint will receive a case number and will then be logged into STEPS, Inc.'s records identifying its basis and alleged harm.

In cases where STEPS, Inc. assumes the investigation of the complaint, STEPS, Inc. will provide the respondent with the opportunity to respond to the allegations in writing. The respondent will have 10 calendar days from the date of STEPS, Inc. written notification of acceptance of the complaint to furnish his/her response to the allegations.

STEPS, Inc.'s final investigative report and a copy of the complaint will be forwarded to the Federal Transit Administration (FTA) or appropriate agency and affected parties within 60 calendar days of the acceptance of the complaint.

STEPS, Inc. will notify the parties of its final decision.

If complainant is not satisfied with the results of the investigation of the alleged discrimination and practices the complainant will be advised of their right to file a complaint with FTA. Effective: 11/01/2018 Revised: 06/24/2021

TITLE VI NOTICE TO THE PUBLIC

Title VI of the Civil Rights Act of 1964 prohibits discrimination based on 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).

STEPS, INC. is committed to ensuring that no person is excluded from participation in or denied the benefits of its transportation services based on 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 **STEPS, INC.**, or otherwise being discriminated against because of your race, color, national origin, gender, age, or disability, our contact information is:

Katie Rhodes
Transportation Manager
STEPS, INC.
225 Industrial Park Road
Farmville, VA 23901
434-315-5909 x 14
krhodes@steps-inc.org

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 STEPS, INC's Transportation Policy.

PROCEDURES FOR NOTIFYING THE PUBLIC OF TITLE VI RIGHTS AND HOW TO FILE A COMPLAINT

STEPS, INC. in adherence to the Title VI requirement, posts the TITLE VI Rights and how to file a complaint in the following locations:

- Corporate Website – www.steps-inc.org/adanotice
- Corporate Office – 225 Industrial Park Road, Farmville, VA 23901
 - Lobby and Lunchroom
- STEPS Secure Document Destruction – 100 Industrial Park Road, Farmville, VA 23901
 - Public Waiting Area and Break Area
- In each STEPS transportation vehicle purchased with DRPT Section 5310 funding – 3 minivans and 1 14-person paratransit van located in Farmville, VA

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 STEPS, Inc., the agency will follow these procedures:

Procedures

1. Any individual, group of individuals, or entity that believes they have been subjected to discrimination based on race, color, or national origin may file a written complaint with the Vice President of Administration and Compliance. 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 based on race, color, and national origin
 - if known, the names and/or job titles of those individuals perceived as parties in the incident
 - contact information for any witnesses
 - indication of any related complaint activity (i.e., was the complaint also submitted to DRPT or FTA)
 - d. The complaint shall be submitted to the STEPS, Inc. Title VI Manager at 225 Industrial Park Road, Farmville, VA 23901 or krhodes@steps-inc.org
 - e. Complaints received by any other employee of STEPS, Inc. will be immediately forwarded to the Title VI Manager.
 - f. In the case where a complainant is unable or incapable of providing a written statement, a verbal complaint of discrimination may be made to the Title VI Manager. Under these circumstances, the complainant will be interviewed, and the Vice President of Administration and Compliance 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 STEPS, Inc. Authorizing Official
 - c. ensure that the complaint is entered in the complaint database
3. Within 3 business days of receipt of the complaint, the Title VI Manager will contact the complainant by telephone to set up an interview.
4. The complainant will be informed that they have a right to have a witness or representative present during the interview and can submit any documentation he/she perceives as relevant to proving his/her complaint.
5. If DRPT has assigned staff to assist with the investigation, the Title VI Manager will offer an opportunity to participate in the interview.

6. The alleged discriminatory service or program official will be given the opportunity to respond to all aspects of the complainant's allegations.
7. The Title VI Manager will determine, based on relevancy or duplication of evidence, which witnesses will be contacted and questioned.
8. The investigation may also include:
 - a. investigating contractor operating records, policies or procedures
 - b. reviewing routes, schedules, and fare policies
 - c. reviewing operating policies and procedures
 - d. reviewing scheduling and dispatch records
 - e. observing behavior of the individual whose actions were cited in the complaint
9. All steps taken and findings in the investigation will be documented in writing and included in the complaint file.
10. The Title VI Manager will contact the complainant at the end 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 end of the investigation and within 60 days of the interview with the complainant, the Title VI Manager will prepare a report that includes a narrative description of the incident, identification of persons interviewed, findings, and recommendations for disposition. This report will be provided to the Authorizing Official, DRPT, and, if appropriate, STEPS, Inc.'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 STEPS, Inc. 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 based on 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

VIII. 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 STEPS, Inc. 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.

STEPS, Inc. 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.

STEPS, Inc. will make these determinations based on a demographic analysis of the population(s) affected, the type of plan, program, and/or service under consideration, and the resources available. Efforts to involve minority and LEP populations in public participation activities may include both comprehensive measures, such as placing public notices at all transit stations, stops, and vehicles, as well as targeted measures to address linguistic, institutional, cultural, economic, historical, or other barriers that may prevent minority and LEP persons from effectively participating in our decision-making process.

SOME OF THOSE EFFECTIVE PUBLIC OUTREACH PRACTICES INCLUDES:

- a. Scheduling meetings at times and locations that are convenient and accessible for minority, low income 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.

SEE APPENDIX E-Summary of Outreach Efforts

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

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 STEPS, Inc. is based on FTA guidelines.

As required, STEPS, Inc. developed a written LEP Plan (below). Using American Community Survey (ACS) data, STEPS, Inc. 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 STEPS, Inc.’s service area. The agency’s service area includes a total of 947, or 1.65%, persons with Limited English Proficiency (those persons who indicated that they spoke English “less than very well,” in the 2011-2015 ACS Census).

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.

Table 1 – LEP by Language Spoken at Home

STEPS Service Area			
Language	Number of LEP Population	Percent of Service Area Population Speaking Language	Percent of LEP Population Speaking Language
Spanish or Spanish Creole	757	1.32%	79.94%
Mon-Khmer	57	0.10%	6.02%
Persian	44	0.08%	4.65%
Tagalog	34	0.06%	3.59%
French	25	0.04%	2.64%
Other and unspecified languages	16	0.03%	1.69%
African languages	8	0.01%	0.84%
Urdu	3	0.01%	0.32%
Hindi	2	0.00%	0.21%
Chinese	1	0.00%	0.11%
Total LEP Population	947	1.65%	
Total Service Area Population	57,513		

Charlotte County			
Language	Number of LEP Population	Percent of County Population Speaking Language	Percent of LEP Population Speaking Language
Spanish or Spanish Creole	42	0.36%	93.33%
Urdu	3	0.03%	6.67%
Total LEP Population	45	0.39%	
Total County Population	11,635		

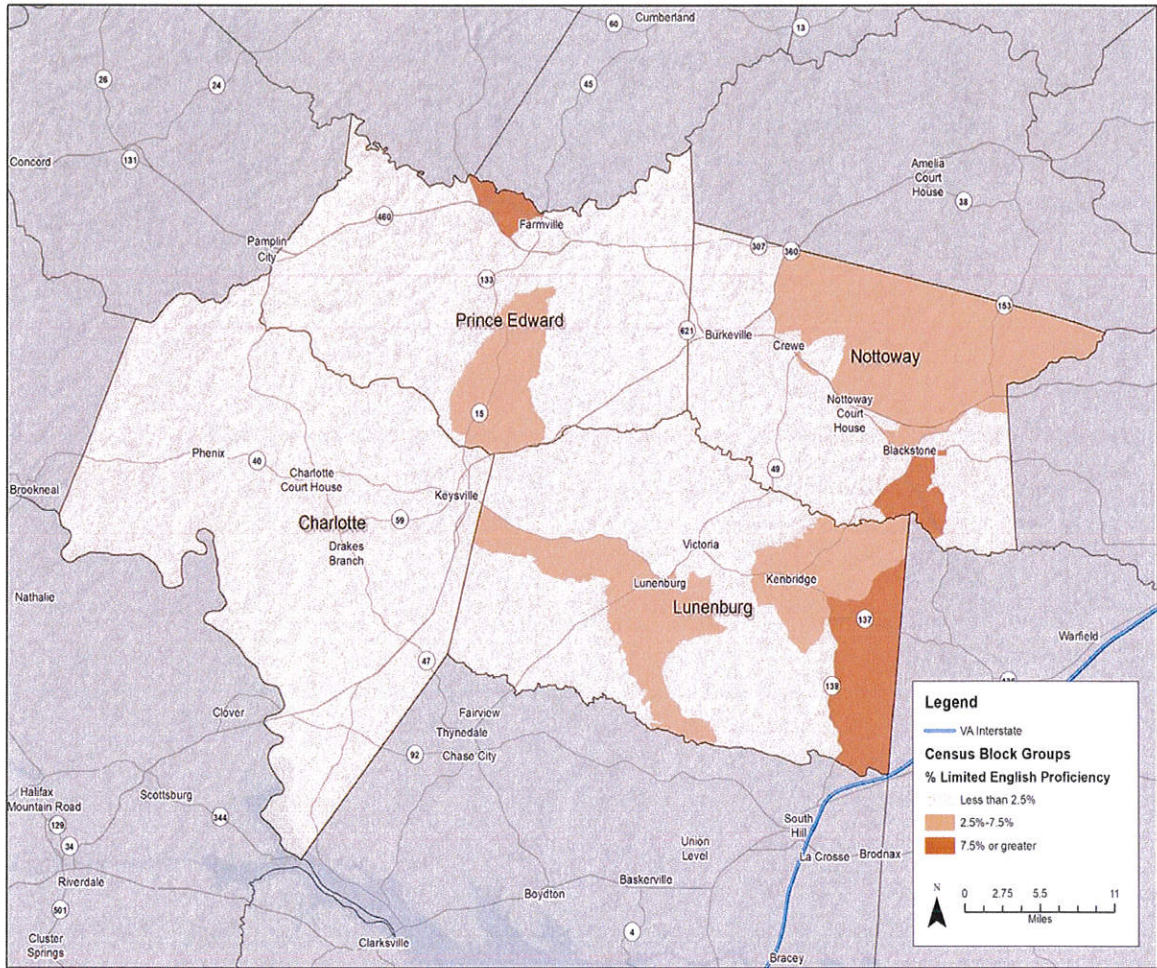
Lunenburg County			
Language	Number of LEP Population	Percent of County Population Speaking Language	Percent of LEP Population Speaking Language
Spanish or Spanish Creole	210	1.76%	80.15%
Persian	44	0.37%	16.79%
African languages	4	0.03%	1.53%
Hindi	2	0.02%	0.76%
French	1	0.01%	0.38%
Chinese	1	0.01%	0.38%
Total LEP Population	262	2.19%	
Total County Population	11,956		

Nottoway County			
Language	Number of LEP Population	Percent of County Population Speaking Language	Percent of LEP Population Speaking Language
Spanish or Spanish Creole	204	1.72%	71.33%
Mon-Khmer	57	0.48%	19.93%
Other and unspecified languages	16	0.14%	5.59%
French	5	0.04%	1.75%
African languages	4	0.03%	1.40%
Total LEP Population	286	2.42%	
Total County Population	11,828		

Prince Edward County			
Language	Number of LEP Population	Percent of County Population Speaking Language	Percent of LEP Population Speaking Language
Spanish or Spanish Creole	301	1.36%	85.03%
Tagalog	34	0.15%	9.60%
French	19	0.09%	5.37%
Total LEP Population	354	1.60%	
Total County Population	22,094		

It is noted that there are relatively low number of LEP persons in the service area - no language is spoken by over 5% or a total of 1,000 persons in the LEP population.

Figure 1 – % LEP by Census Block Group



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

STEPS, Inc. reviewed the relevant benefits, services, and information provided by the agency and determined that to date we have not come in contact with any LEP citizens that require services offered by STEPS, Inc.

STEPS, Inc. uses internet-based translation services and has an interpreter for the Spanish speaking population that can be brought in to help with various tasks, i.e. forms, contracts, and the complaint process. The contracted person is of Spanish descent, i.e. Colombia, with proficiencies in both Spanish and English. In the area that STEPS, INC provides services, it has not been determined a permanent contracted translator is needed at this time for Spanish or additional languages. The LEP population served by STEPS, Inc. is being tracked through the software purchased in the 2017-2018 fiscal year. Outside referrals come through various agencies that have already identified if the client does have a LEP and a translator is provided.

We will continue to identify emerging populations as updated Census and American Community Survey data becomes available for our service area. STEPS, Inc. will also attempt to identify languages of LEP persons that may contact us and keep records on contacts to accurately assess the frequency of contact.

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

STEPS, Inc. services are provided with four (4) pillars of service which include:

1. Workforce development – job training and employment for citizens with disabilities, senior community services employment program, and workplace supports for TANF recipients
2. Economic development – commercial lines of business including: recycling, and secure document shredding
3. Emergency services – homelessness prevention services, Dominion Energy Share, and alleviation of poverty
4. Education – Head Start and Early Head Start provider

As noted earlier, STEPS, Inc. has not come into direct contact with LEP persons requiring our services.

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

Costs

STEPS, Inc. does not currently charge clients for the resources and services provided. We do not anticipate that these activities or costs will increase. Internet-based translation services are minimal costs and are used prior to bringing in a contracted translator.

Resources

Based on available resources, internet-based translation services is the most feasible and appropriate for our agency at this time.

However, in-kind assistance is available from the contracted interpreter.

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:

- Volunteer interpreter from Colombia that helps clients navigate the English language.

LEP Implementation Plan

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

- Attempt to hire bilingual staff with competency in spoken and written Spanish.

Staff Access to Language Assistance Services

Agency staff who come into contact with LEP persons can access language services by determining the availability of the volunteer interpreter and trying to schedule an appointment/phone call with the LEP customer and the bilingual interpreter. All staff will be provided with a list of available language assistance services and additional information and referral resources (such as community organizations which can assist LEP persons). This list will be updated at least annually.

Responding to LEP Callers

Staff who answer calls from the public respond to LEP customers as follows:

By checking the availability of the bilingual interpreter and scheduling an appointment with the LEP interpreter. If the individual speaks a language other than Spanish, they will be referred to the community service board that oversees us for language services.

Responding to Written Communications from LEP Persons

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

Checking the availability of the bilingual interpreter and scheduling an appointment with the LEP interpreter. If the individual speaks a language other than Spanish, they will be referred to the community service board that has referred the client to STEPS, Inc.

Responding to LEP Individuals in Person

The following procedures are followed when an LEP person visits our customer service and administrative office:

Checking the availability of the bilingual interpreter and scheduling an appointment with the LEP interpreter. If the individual speaks a language other than Spanish, they will be referred to the community service board that has referred the client to STEPS, Inc.

The following procedures are followed by operators when an LEP person has a question on board a STEPS, Inc. vehicle:

STEPS, Inc. does not use federally funded vehicles for public transportation. If any situation with an LEP member of the public arises, the vehicle operator can determine the availability of bilingual staff or ask for assistance from a Google Translate phone/computer app.

Staff Training

As noted previously, all STEPS, Inc. 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 meet customers, as well as their supervisors and all management staff, receive annual refresher training on policies and procedures related to assisting LEP persons.

Providing Notice to LEP Persons

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

- Following our Title VI policy statement included on our vital documents.
- Through signs posted on our vehicles and in our customer service and administrative offices.

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

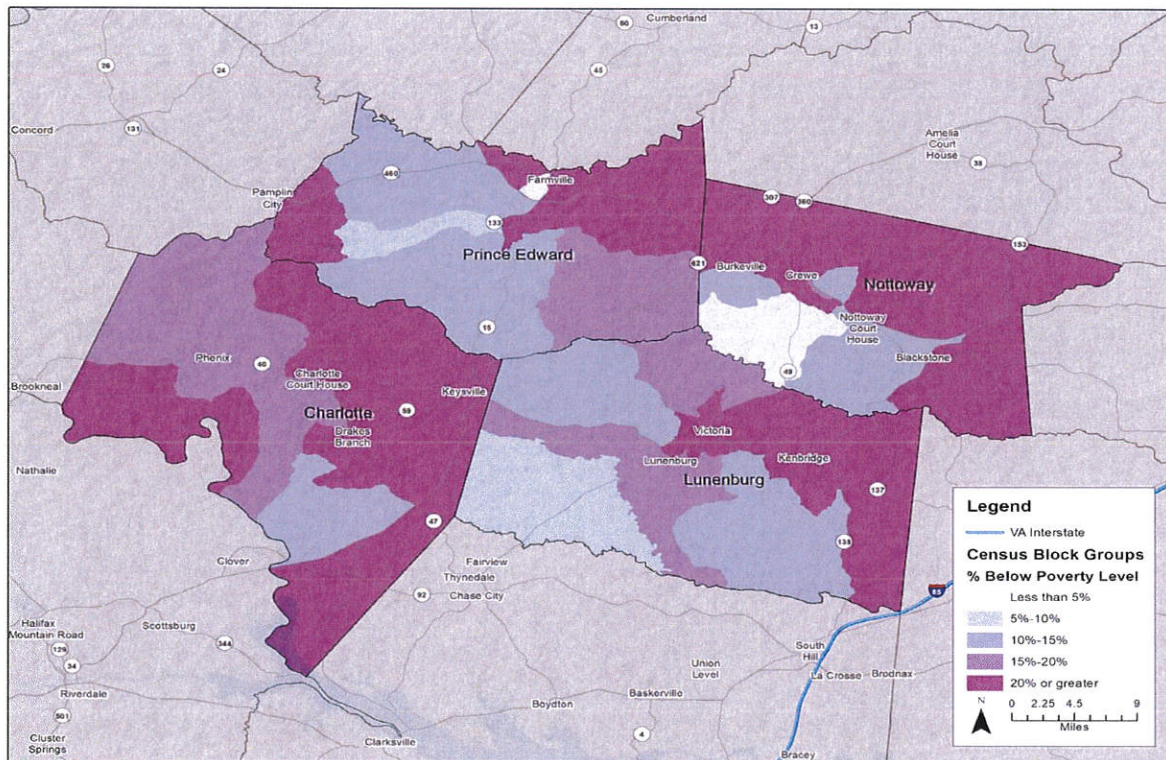
As part of ongoing outreach to community organizations, STEPS, Inc. will solicit feedback on the effectiveness of language assistance provided and unmet needs. Currently STEPS, Inc. does not serve any LEP customers. If a LEP customer is referred to us, we will conduct periodic internal meetings with staff to determine what sort of language assistance should be given to an LEP customer, and what specific support is necessary for that client.

In preparing the triennial update of this plan, STEPS, Inc. 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, STEPS, Inc. 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 STEPS, Inc. will attempt to identify the most cost-effective approaches.

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

Figure 2 - % Below Poverty by Census Block Group

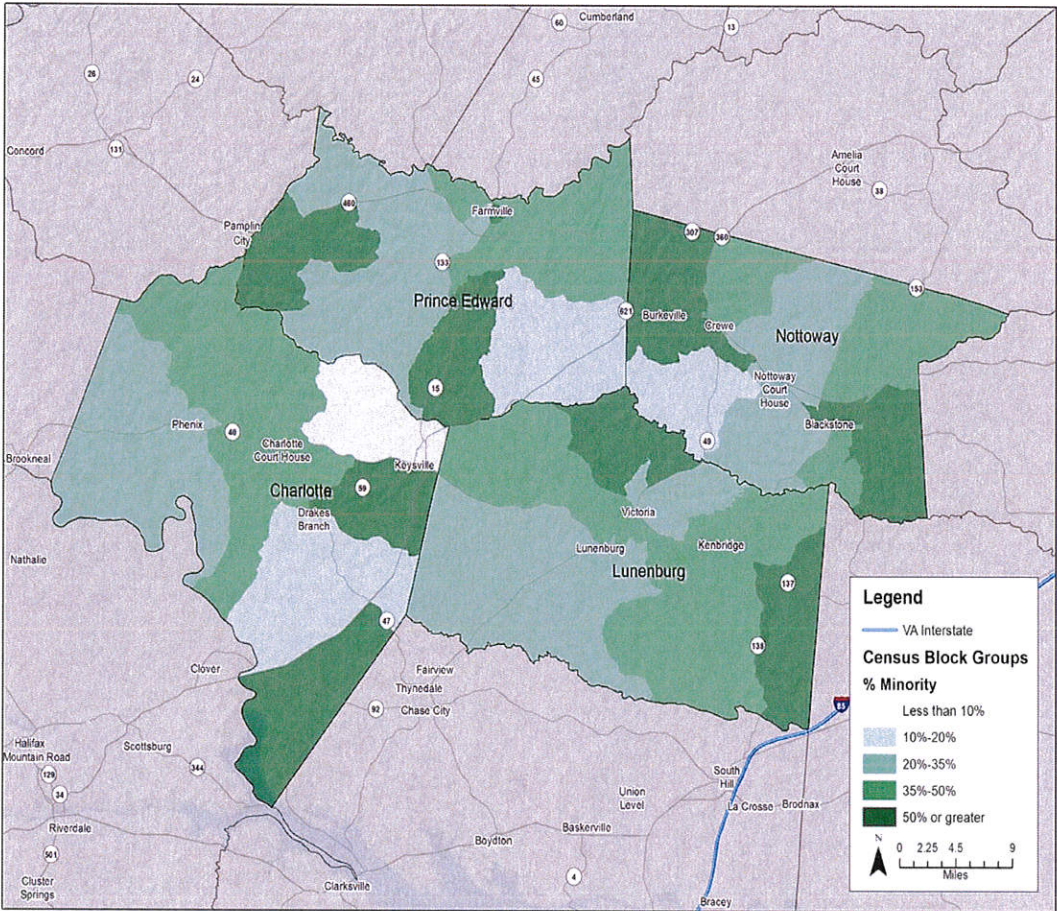


X. MINORITY REPRESENTATION ON PLANNING AND ADVISORY BODIES

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.”

STEPS, Inc., based on the designation as the Community Action Agency serving six counties in South Central Virginia, must adhere to the “Tripartite Governing Board” requirements set forth by the Federal Government: one-third democratically selected representatives of low-income people, one-third local public officials or their designees, and the remainder representatives of business, industry, labor, religious, social welfare, and other private groups in the community. Currently, STEPS, Inc. has no planning boards, advisory councils or committees of which membership we select. We do take into consideration race when seating board members.

Figure 3 - % Minority by Census Block Group



XI. MONITORING TITLE VI COMPLAINTS

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

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

APPENDIX A – Title VI Notice to the Public

APPENDIX B – Title VI Notice to the Public List of Locations

APPENDIX C – Complaint Form

APPENDIX D – Title VI Investigations, Complaints, and Lawsuits

APPENDIX E – Summary of Outreach Efforts