
Title VI Plan and Procedures
Title VI of the Civil Rights Act of 1964

Friends 4 Recovery Whole Health Center



Adopted date

November 26, 2018

Last Update February 2020

Table of Contents

I.	INTRODUCTION.....	2
II.	OVERVIEW OF SERVICES	3
III.	POLICY STATEMENT AND AUTHORITIES	4
IV.	NONDISCRIMINATION ASSURANCE TO DRPT	5
V.	PLAN APPROVAL DOCUMENT	6
VI.	ORGANIZATION AND TITLE VI PROGRAM RESPONSIBILITIES	8
VII.	PROCEDURES FOR NOTIFYING THE PUBLIC OF TITLE VI RIGHTS AND HOW TO FILE A COMPLAINT	11
VIII.	TITLE VI COMPLAINT PROCEDURES	12
IX.	PUBLIC OUTREACH AND INVOLVEMENT	17
X.	LANGUAGE ASSISTANCE PLAN FOR PERSONS WITH LIMITED ENGLISH PROFICIENCY (LEP)	18
XI.	MINORITY REPRESENTATION ON PLANNING AND ADVISORY BODIES..	26
XII.	MONITORING TITLE VI COMPLAINTS	26
	Appendix A - Title VI Notice to the Public.....	27
	Appendix B - Title VI Notice to the Public List of Locations	28
	Appendix C - Title VI Complaint Form	28
	Appendix D - Investigations, Lawsuits and Complaints Document	29
	Appendix E - Summary of Outreach Efforts	30
	Appendix F -Table Minority Representation on Committees by Race.....	31

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 Friends 4 Recovery Whole Health Center (hereafter "Friends 4 Recovery") incorporates nondiscrimination policies and practices in providing services to the public. Friends for Recovery 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

Friends 4 Recovery Whole Health Center Whole Health Center is a facility that provides education, wellness coaching, recreational services, vocational rehabilitation, and a social environment to people who suffer or who have suffered with mental health or substance use disorders. The Center Staff and Board are all people who have lived experience with such disorders. We provide services in English and Spanish. Friends 4 Recovery Whole Health Center provides limited transportation to members which include daytime pick-up and drop-off, community events, trainings and conferences, and social outings.

Friends 4 Recovery Whole Health Center is a small non-profit organization with limited financial resources. For example, the organization has only 4 paid employees, only one of which receives a full time salary. Friends 4 Recovery Whole Health Center has a Hispanic Coordinator who works mainly with the Hispanic population. Friends 4 Recovery Whole Health Center will work with the Hispanic population in Title VI issues in conjunction with our Hispanic Coordinator. Any materials requested by the Hispanic population will be translated to Spanish upon request. Any issues or complaints by Hispanic members will be handled in conjunction with our Hispanic Coordinator. Friends 4 Recovery Whole Health Center services the English- and Spanish-speaking populations mainly. However, any populations of other languages will be assisted through the use of translation tools such as Google Translator.

III. POLICY STATEMENT AND AUTHORITIES

Title VI Policy Statement

Friends 4 Recovery Whole Health Center 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 Friends 4 Recovery Whole Health Center 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

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, Friends 4 Recovery Whole Health Center 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, Friends 4 Recovery Whole Health Center confirms to DRPT the agency's commitment to nondiscrimination and compliance with federal and state requirements.

V. PLAN APPROVAL DOCUMENT

FRIENDS 4 RECOVERY WHOLE HEALTH CENTER EXECUTIVE COMMITTEE - MINUTES WEDNESDAY NOVEMBER 7, 2018 In attendance were Directors David Coppola and Madeline Quintero. In attendance by phone was Director Lori Gongaware. In attendance was Executive Director Larry Almarode. The Meeting convened at 3:37 pm. Larry Almarode explained the purpose of the meeting, touching on the following points: In order to receive the Transportation Grant, the Center must create a Title VI Plan. The Center cannot buy the van until the Title VI Plan is approved. The Center must have a record of the Board approving the proposed Title VI Plan. The deadline for the submission of the Title VI Plan is December 1, 2018. Much of the Title VI Plan document does not apply to the Center. We must have a complaint form, and a list of complaints, lawsuits, and investigations. We must have a poster in the van and a public notice in the office. Larry Almarode made a motion to approve the proposed Title VI plan, and Madeline Quintero seconded the motion. A vote was taken and the motion was passed by a vote of 3 (aye) to zero (nay). It was agreed that the Center Relocation Committee will meet on Monday November 12, 2018 at 2:00 pm. David Coppola made a motion to adjourn the Meeting and Madeline Quintero seconded the motion. The Meeting was adjourned at 3:43 pm. The Minutes were prepared by David Coppola.

I hereby acknowledge the receipt of the Friends 4 Recovery Whole Health Center Title VI Implementation Plan 2018-2021. I have reviewed and approve the Plan. I am committed to ensuring that no person is excluded from participation in, or denied the benefits of transit services on the basis of race, color, or national origin, as protected by Title VI according to Federal Transit Administration (FTA) Circular 4702.1B Title VI requirements and guidelines for FTA sub-recipients.

Signature of Authorizing Official

Chris Newcomb, Executive Director
Friends 4 Recovery Whole Health Center

Date

VI. ORGANIZATION AND TITLE VI PROGRAM RESPONSIBILITIES

Friends 4 Recovery Whole Health Center's Executive Director is responsible for ensuring implementation of the agency's Title VI program. Title VI program elements are interrelated and responsibilities may overlap. The specific areas of responsibility have been delineated below for purposes of clarity.

Overall Organization for Title VI

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

Responsibilities of the Title VI Manager:

The Title VI Manager is charged with the responsibility for implementing, monitoring, and ensuring compliance with Title VI regulations. Title VI responsibilities are as follows:

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

General Title VI responsibilities of the agency

The Title VI Manager is responsible for substantiating that these elements of the plan are appropriately implemented and maintained, and for coordinating with those responsible for public outreach and involvement and service planning and delivery.

1. Data collection

To ensure that Title VI reporting requirements are met, Friends 4 Recovery Whole Health Center 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.

2. Annual Report and Updates

As a sub-recipient of FTA funds, Friends 4 Recovery Whole Health Center 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.

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 list of Title VI investigations, complaints or lawsuits filed with the agency since the last submission

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.

4. Dissemination of information related to the Title VI program

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. Friends 4 Recovery Whole Health Center 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

7. Internal education

8. Title VI clauses in contracts

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

[SEE APPENDIX A-Title VI Notice to the Public](#)
[SEE APPENDIX B-Title VI Notice to the Public List of Locations](#)

VIII. TITLE VI COMPLAINT PROCEDURES

Requirement to Develop Title VI Complaint Procedures and Complaint Form.

In order to comply with the reporting requirements established in 49 CFR Section 21.9(b), all recipients shall develop procedures for investigating and tracking Title VI complaints filed against them and make their procedures for filing a complaint available to members of the public. Recipients must also develop a Title VI complaint form. The form and procedure for filing a complaint shall be available on the recipient's website and at their facilities.

Sample of Narrative

Any individual may exercise his or her right to file a complaint with Friends 4 Recovery Whole Health Center 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.

Friends 4 Recovery Whole Health Center 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:

Friends 4 Recovery Whole Health Center 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 Friends 4 Recovery Whole Health Center's nondiscrimination policies and procedures, or to file a complaint, please visit the website at www.friends4recovery.org or contact...

*Chris Newcomb, Executive Director, Friends 4 Recovery Whole Health Center
7420 Whitepine Rd, North Chesterfield, VA 23237
(804) 308-1366, chris@friends4recovery.org*

[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 Friends 4 Recovery Whole Health Center the agency will follow these procedures:

Procedures

1. Any individual, group of individuals, or entity that believes they have been subjected to discrimination on the basis of race, color, or national origin may file a written complaint with the Title VI Manager. The complaint is to be filed in the following manner:
 - a. A formal complaint must be filed within 180 calendar days of the alleged occurrence.
 - b. The complaint shall be in writing and signed by the complainant(s).
anyone can file a complaint and staff will work to ensure that the complaint process is accessible to all individuals.
 - 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?)

The complaint shall be submitted to the Friends 4 Recovery Whole Health Center Title VI Manager at 7420 Whitepine Rd, North Chesterfield, VA 23237 or chris@friends4recovery.org.

- d. Complaints received by any other employee of Friends 4 Recovery Whole Health Center will be immediately forwarded to the Title VI Manager.

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 Executive Director 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 Friends 4 Recovery Whole Health Center 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 keep this in
 - e. observing behavior of the individual whose actions were cited in the complaint
9. All steps taken and findings in the investigation will be documented in writing and included in the complaint file.
10. The Title VI Manager will contact the complainant at the conclusion of the investigation, but prior to writing the final report, and give the complainant an opportunity to give a rebuttal statement at the end of the investigation process.
11. At the conclusion of the investigation and within 60 days of the interview with the complainant, the Title VI Manager will prepare a report that includes a narrative description of the incident, identification of persons interviewed, findings, and recommendations for disposition. This report will be provided to the Authorizing Official, DRPT, and, if appropriate, Friends 4 Recovery Whole Health Center'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 Friends 4 Recovery Whole Health Center. DRPT will analyze the facts of the case and will issue its conclusion to the appellant according to their procedures.

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

Transportation-Related Title VI Investigations, Complaints, and Lawsuits

Background

All recipients shall prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, or national origin:

- Active investigations conducted by FTA and entities other than FTA;
- Lawsuits; and
- Complaints naming the recipient.

This list shall include the date that the transportation-related Title VI investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by the recipient in response, or final findings related to the investigation, lawsuit, or complaint. This list shall be included in the Title VI Program submitted to DRPT every three years and information shall be provided to DRPT quarterly and annually.

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

IX. PUBLIC OUTREACH AND INVOLVEMENT

PUBLIC PARTICIPATION PLAN

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

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

SAMPLE PLAN FOR SERVING 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 Friends 4 Recovery Whole Health Center is based on FTA guidelines.

As required, Friends 4 Recovery Whole Health Center developed a written LEP Plan (below). Using American Community Survey (ACS) Census data, Friends 4 Recovery Whole Health Center 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 Friends 4 Recovery Whole Health Center’s service area. The agency’s service area includes a total of 22,245 (4.37%) persons with Limited English Proficiency (those persons who indicated that they spoke English “less than very well,” in the 2011-2015 ACS Census).

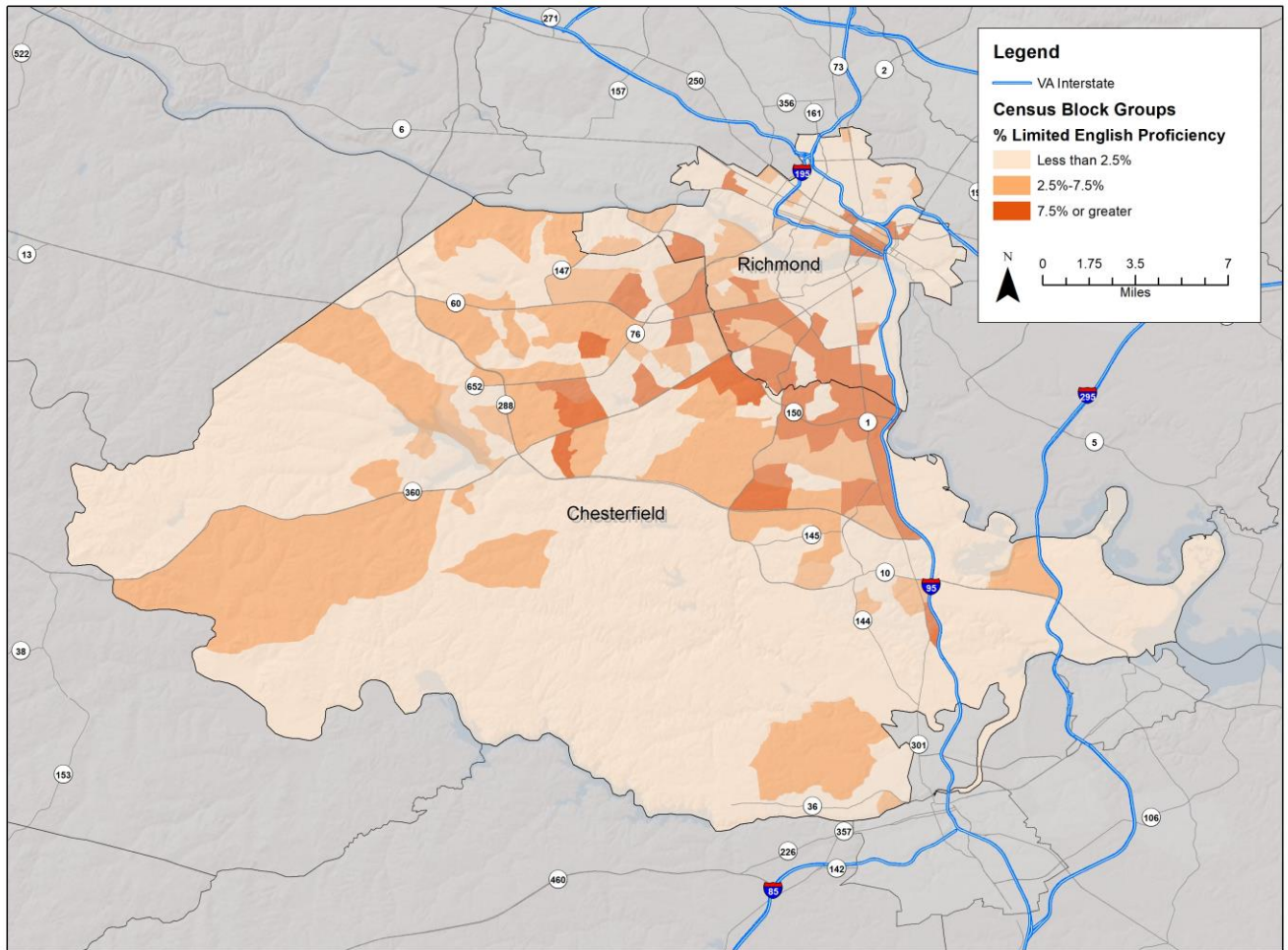
Information from the 2011-2015 ACS also provides more detail on the specific languages that are spoken by those who report that they speak English less than very well. Languages spoken at home by those with LEP are presented below. These data indicate the extent to which translations into other language are needed to meet the needs of LEP persons.

Friends 4 Recovery Whole Health Center Service Area			
Language	Number of LEP Population	Percent of Service Area Population Speaking Language	Percent of LEP Population Speaking Language
Spanish or Spanish Creole	15,072	2.96%	67.75%
Vietnamese	1,006	0.20%	4.52%
Chinese	905	0.18%	4.07%
Korean	818	0.16%	3.68%
African languages	474	0.09%	2.13%
French	470	0.09%	2.11%
Arabic	389	0.08%	1.75%
Mon-Khmer	352	0.07%	1.58%
German	292	0.06%	1.31%
Other Asian languages	264	0.05%	1.19%
Urdu	248	0.05%	1.11%
Persian	245	0.05%	1.10%
Other and unspecified languages	216	0.04%	0.97%
Hindi	183	0.04%	0.82%
Other Indic languages	178	0.03%	0.80%
Tagalog	175	0.03%	0.79%
Gujarati	169	0.03%	0.76%
Russian	150	0.03%	0.67%
Japanese	148	0.03%	0.67%
Italian	115	0.02%	0.52%
Portuguese or Portuguese Creole	97	0.02%	0.44%
Thai	77	0.02%	0.35%
Other Indo-European languages	77	0.02%	0.35%
Laotian	34	0.01%	0.15%

Serbo-Croatian	33	0.01%	0.15%
Other West Germanic languages	22	0.00%	0.10%
French Creole	13	0.00%	0.06%
Hungarian	10	0.00%	0.04%
Other Slavic languages	7	0.00%	0.03%
Other Pacific Island languages	4	0.00%	0.02%
Other Native North American languages	2	0.00%	0.01%
Total LEP Population	22,245	4.37%	
Total County Population	508,865		

The most spoken language by LEP persons is Spanish or Spanish Creole (15,072). Vietnamese (1,006) is also above the Safe Harbor Provision. Figure 1 shows the percentage of LEP persons by Census Block Group in the service area. There are larger percentages of LEP persons in southern Richmond and northern Chesterfield County.

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

Friends 4 Recovery Whole Health Center reviewed the relevant benefits, services, and information provided by the agency and determined the extent to which LEP persons have come into contact with these functions through the following channels:

- Contact with transit vehicle operators;
- Calls to Friends 4 Recovery Whole Health Center’s customer service telephone line;
- Visits to the agency’s headquarters;
- Access to the agency’s website;
- Attendance at community meetings or public hearings hosted by Friends 4 Recovery Whole Health Center;
- Contact with the agency’s ADA complementary paratransit system (including applying for eligibility, making reservations, and communicating with drivers).

We will continue to identify emerging populations as updated Census and American Community Survey data become available for our service area. In addition, when LEP persons contact our agency, we attempt to identify their language and keep records on contacts to accurately assess the frequency of contact. To assist in language identification, we use a language identification flashcard based on that which was developed by the U.S. Census. (<http://www.lep.gov/ISpeakCards2004.pdf>)]

Our Hispanic Outreach Coordinator works primarily with people who have LEP. Most all of her clients provide their transportation to and from the Center.

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

Friends 4 Recovery Whole Health Center provides the following programs, activities and services:

- Wellness and Education workshops, including evidence-based and emerging programs.
- One to One Peer counseling based on strengths-based recovery principles and person centered goal setting.
- Community inclusion and integration for people with mental health challenges and/or substance use disorders.

The following are the most critical services provided by Friends 4 Recovery Whole Health Center for all customers, including LEP persons.

- Safety and security awareness instructions
- Emergency evacuation procedures
- Services targeted at low income persons
- Transportation to community resources
- Transportation to participate in volunteer work

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

The following language assistance measures currently being provided by Friends 4 Recovery Whole Health Center

- We provide one to one peer counseling to the Hispanic population and provide brochures and flyers in Spanish.
- We have on staff a part-time Hispanic Outreach Coordinator who works 18 hours a week. We also provide Google Translate on our website.

We anticipate that these activities and costs will increase as follows.

Based on the analysis of demographic data and contact with community organizations and LEP persons, Friends 4 Recovery Whole Health Center has determined that the following additional services are ideally needed to provide meaningful access:

Due to the size of our organization and limited funding we have no plans for the near future to offer additional resources.

Resources

The available budget that could be currently be devoted to additional language assistance expenses is \$0. This amount is likely to increase over time as funding becomes available.

Friends 4 Recovery Whole Health Center doesn't wish to receive additional grant funding for language assistance at this time.

In addition, in-kind assistance may be available through our Hispanic Outreach coordinator, other bilingual staff/customers, as well as in-kind translation services provided by other community organizations

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:

- Continued employment of our Hispanic Outreach Coordinator
- Google translate capabilities on website

LEP Implementation Plan

Through the four-factor analysis, Friends 4 Recovery Whole Health Center has determined that the following types of language assistance are most needed and feasible:

- Translation of vital documents into Spanish.
- Attempt to hire bilingual staff with competency in spoken and written (Spanish, Vietnamese, etc. as appropriate for your service area).
- Google Translate capabilities on our website

Staff Access to Language Assistance Services

Agency staff who come into contact with LEP persons can access language services by checking the availability of our Hispanic Outreach Coordinator if the person in question is a Spanish-speaker, reaching out to other bilingual staff if available, or using a Census language identification flashcard and referring the customer in question to any local organizations that can provide in-kind support. 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:

- Reach out to the Hispanic Outreach Coordinator for assistance if available/applicable.
- Reach out to other bilingual staff/volunteers if possible.

Responding to Written Communications from LEP Persons

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

- Reach out to the Hispanic Outreach Coordinator for assistance if available/applicable.
- Reach out to other bilingual staff/volunteers if possible.

Responding to LEP Individuals in Person

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

- Reach out to the Hispanic Outreach Coordinator for assistance if available/applicable.
- Reach out to other bilingual staff/volunteers if possible.

The following procedures are followed by operators when an LEP person has a question on board a Friends 4 Recovery Whole Health Center vehicle:

- Reach out to the Hispanic Outreach Coordinator for assistance if available/applicable.
- Reach out to other bilingual staff/volunteers if possible.

Staff Training

As noted previously, all Friends 4 Recovery Whole Health Center staff are provided with a list of available language assistance services and additional information and referral resources, updated annually.

All new hires receive training on assisting LEP persons as part of their sensitivity and customer service training. This includes:

- A summary of the transit agency's responsibilities under the DOT LEP Guidance;

- A summary of the agency's language assistance plan;
- A summary of the number and proportion of LEP persons in the agency's service area, the frequency of contact between the LEP population and the agency's programs and activities, and the importance of the programs and activities to the population;
- A description of the type of language assistance that the agency is currently providing and instructions on how agency staff can access these products and services; and
- A description of the agency's cultural sensitivity policies and practices.

Also, all staff who routinely come into contact with customers, as well as their supervisors and all management staff, receive annual refresher training on policies and procedures related to assisting LEP persons.

Providing Notice to LEP Persons

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

Following our Title VI policy statement included on our vital documents.

- on our website, with links to translations of vital documents in other languages.
- through signs posted on our vehicles and in our administrative offices.
- through ongoing outreach efforts to community organizations, schools, and religious organizations.
- including the agency's language translation line on all materials.
- 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

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, Friends 4 Recovery Whole Health Center will solicit feedback on the effectiveness of language assistance provided and unmet needs. In addition, we will conduct periodic internal staff meetings with our Hispanic Outreach Coordinator and review updated Census Data in order to understand the adequacy and quality of the language assistance provided, and determine changes to LEP needs.

In preparing the triennial update of this plan, Friends 4 Recovery Whole Health Center 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, Friends 4 Recovery Whole Health Center 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 Friends 4 Recovery Whole Health Center will attempt to identify the most cost-effective approaches.

As the community grows and new LEP groups emerge, Friends 4 Recovery Whole Health Center will strive to address the needs for additional language assistance.

XI. 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.”

Friends 4 Recovery Whole Health Center has transit-related, non-elected planning boards, advisory councils or committees, or similar committees, the membership of which we select.

We maintain a Board of Directors made up of people with lived experience with mental health challenges and/or substance use disorders. We have an application process that our nominating committee reviews and presents to the Board at large for accepting new board members. All Board members are voted in based on a majority vote.

SEE APPENDIX F- TABLE MINORITY REPRESENTATION ON COMMITTEES BY RACE

XII. MONITORING TITLE VI COMPLAINTS

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

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

Appendix A - Title VI Notice to the Public

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, Friends 4 Recovery Whole Health Center 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

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).

Friends 4 Recovery Whole Health Center Whole Health Center 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 Friends 4 Recovery Whole Health Center Whole Health Center, or otherwise being discriminated against because of your race, color, national origin, gender, age, or disability, our contact information is:

Chris Newcomb
Executive Director
Friends 4 Recovery Whole Health Center Whole Health Center
7420 Whitepine Rd
North Chesterfield, VA 23237
(804) 308-1366
chris@friends4recovery.org

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

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

Title VI notice is posted in the following locations:

- Website
- Staff Office
- Center lobby
- Vehicles

APPENDIX C - TITLE VI COMPLAINT FORM

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				
Have you previously filed a Title VI complaint with this agency?			Yes	No
Section V				
Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?				
<input type="checkbox"/> Yes <input type="checkbox"/> No				

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

You may attach any written materials or other information that you think is relevant to your complaint.

Signature and date required below

Signature

Date

APPENDIX D - INVESTIGATIONS, LAWSUITS AND COMPLAINTS DOCUMENT

	Date (Month, Day, Year)	Summary (include basis of complaint: race, color or national origin)	Status	Action(s) taken
Investigations				
1.				
Lawsuits				
1.				
Complaints				
1.				

APPENDIX E - SUMMARY OF OUTREACH EFFORTS

Introduction

The Public Participation Plan (PPP) is a guide for ongoing public participation endeavors. Its purpose is to ensure that Friends 4 Recovery Whole Health Center 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.

Friends 4 Recovery Whole Health Center 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.

Friends 4 Recovery Whole Health Center 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 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.

Our Hispanic Outreach coordinator will do outreach in the Hispanic community to raise awareness of transportation opportunities.

APPENDIX F -TABLE MINORITY REPRESENTATION ON COMMITTEES BY RACE

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	6	3	0					6
% of CAC Committee								
Citizens Advisory Committee on Accessible Transportation (CACAT)								
% of CACAT Committee								