Title VI Plan and Procedures (TRN013)
Title VI of the Civil Rights Act of 1964

Goochland CARES
Free Clinic and Family Services

Adopted Date April 15, 2015
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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 GoochlandCares incorporates nondiscrimination policies and practices in providing services to the public. GoochlandCares’ 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.
I. OVERVIEW OF SERVICES

GoochlandCares’ mission is to provide access to health care and basic human services to Goochland residents. We strive to meet our mission by providing 12 services including transportation. We provide transportation to non-emergency health related appointments for Goochland residents who qualify according to agency income guidelines. Specific services include:

- Medical Care
- Mental Health Services
- Clothes Closet
- Financial Assistance
- Case Management
- Sexual and Domestic Violence
- Dental Care
- Food Pantry
- Emergency Housing
- Critical Home Repair
- Medical Transportation
- GED/ESL Classes
II. POLICY STATEMENT AND AUTHORITIES

Title VI Policy Statement

GoochlandCares 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.

GoochlandCares 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] 6/10/12

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, national origin, or sex, 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.

III. 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 the DRPT with the Annual Grant Application and all Federal Transit Administration grants submitted to the VDRPT GoochlandCares 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, GoochlandCares confirms to VDRPT the agency's commitment to nondiscrimination and compliance with federal and state requirements.

In signing and submitting this assurance, GoochlandCares confirms to DRPT the agency's commitment to nondiscrimination and compliance with federal and state requirements.
I. PLAN APPROVAL DOCUMENT

I hereby acknowledge the receipt of the GoochlandCares 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]

Signature of Authorizing Official

DATE

Sally K. Graham, Executive Director

GoochlandCares
ORGANIZATION AND TITLE VI PROGRAM RESPONSIBILITIES

GoochlandCares’ Director of Finance is responsible for ensuring implementation of the agency’s Title VI program. Title VI program elements are interrelated and responsibilities may overlap. The specific areas of responsibility have been delineated below for purposes of clarity.

Overall Organization for Title VI

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

Detailed Responsibilities of the Title VI Manager

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

1. Process the disposition of Title VI complaints received.

2. Collect statistical data (race, color or national origin) of participants in and beneficiaries of agency programs, (e.g., affected citizens, and impacted communities).

3. Conduct annual Title VI reviews of agency to determine the effectiveness of program activities at all levels.

4. Conduct Title VI reviews of construction contractors, consultant contractors, suppliers, and other recipients of federal-aid fund contracts administered through the agency.

5. Conduct training programs on Title VI and other related statutes for agency employees.

6. Prepare a yearly report of Title VI accomplishments and goals, as required.

7. Develop Title VI information for dissemination to the general public and, where appropriate, in languages other than English.

8. Identify and eliminate discrimination.

9. Establish procedures for promptly resolving deficiency status and writing the remedial action necessary, all within a period not to exceed 90 days.
General Title VI responsibilities of the agency

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

1. Data collection

To ensure that Title VI reporting requirements are met, GoochlandCares 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, GoochlandCares 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. GoochlandCares will also maintain and provide to DRPT an annual basis, the log of public outreach and involvement activities undertaken to ensure that minority and low-income people had a meaningful access to these activities.

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

- A copy of any compliance review report for reviews conducted in the last three years, along with the purpose or reason for the review, the name of the organization that performed the review, a summary of findings and recommendations, and a report on the status or disposition of the findings and recommendations

- Limited English Proficiency (LEP) plan

- procedures for tracking and investigating Title VI complaints

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

- A copy of the agency notice to the public that it complies with Title VI and instructions on how to file a discrimination complaint

3. Annual review of Title VI program

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

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

5. Resolution of complaints

Any individual may exercise his or her right to file a complaint if that person believes that he, she or any other program beneficiaries have been subjected to unequal treatment or discrimination in the receipt of benefits/services or prohibited by non-discrimination requirements. GoochlandCares will report the complaint to DRPT within three business days (per DRPT requirements), and make a concerted effort to resolve complaints locally, using the agency’s Title VI Complaint Procedures. All Title VI complaints and their resolution will be logged as described under Section 1. Data collection and reported annually (in addition to immediately) to DRPT.

6. Written policies and procedures

Our Title VI policies and procedures are documented in this plan and its appendices and attachments. This plan will be updated periodically to incorporate changes and additional responsibilities that arise. During the course of the Annual Title VI Program Review (item 3 above), the Title VI Manager will determine whether or not an update is needed.

7. Internal education

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

**Title VI training is the responsibility of Senior Staff.** Senior Staff includes the Executive Director, Director of Finances, Development Director, Volunteer Coordinator, Free Clinic Director and Family Services Director.

8. Title VI clauses in contracts

In all federal procurements requiring a written contract or Purchase Order (PO), GoochlandCares’ contract/PO will include appropriate non-discrimination clauses. The Title VI Manager is/are responsible for procurement contracts and PO’s to ensure appropriate non-discrimination clauses are included.
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, GoochlandCares 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).

**GoochlandCares** 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 GoochlandCares or otherwise being discriminated against because of your race, color, national origin, gender, age, or disability, our contact information is:

**Name** Alison Smith  
**Title:** Director of Finance  
**Agency Name:** GoochlandCares  
**Address:** 2999 River Road West  
**City, State Zip code:** Goochland VA, 23063  
**Telephone Number:** 804-556-6260  
**Email address:** asmith@goochlandcares.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.

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 GoochlandCares 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.

GoochlandCares 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:

GoochlandCares 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 GoochlandCares’ nondiscrimination policies and procedures, or to file a complaint, please visit the website at www.goochlandcares.org or contact Alison Smith, Director of Finance, 2999 River Road West, Goochland, VA 23063.

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 GoochlandCares’ Client Handbook. brochure.
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 GoochlandCares, the agency will follow these procedures:

**Procedures**

1. Any individual, group of individuals, or entity that believes they have been subjected to discrimination on the basis of race, color, or national origin may file a written complaint with the Title VI Manager. The complaint is to be filed in the following manner:
   a. A formal complaint must be filed within 180 calendar days of the alleged occurrence.
   b. The complaint shall be in writing and signed by the complainant(s).
   c. The complaint should include:
      - the complainant’s name, address, and contact information
      - (i.e., telephone number, email address, etc.)
      - the date(s) of the alleged act of discrimination (if multiple days, include the date when the complainant(s) became aware of the alleged discrimination and the date on which the alleged discrimination was discontinued or the latest instance).
      - a description of the alleged act of discrimination
      - the location(s) of the alleged act of discrimination (include vehicle number if appropriate)
      - an explanation of why the complainant believes the act to have been discriminatory on the basis of race, color, and national origin
      - if known, the names and/or job titles of those individuals perceived as parties in the incident
      - contact information for any witnesses
      - indication of any related complaint activity (i.e., was the complaint also submitted to DRPT or FTA?)
   d. The complaint shall be submitted to the GoochlandCares’ Director of Finances at P.O. 2999 River Road West, Goochland, VA 23063 or asmith@goochlandcares.org
   e. Complaints received by any other employee of GoochlandCares 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 Family Services 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 GoochlandCares Authorizing Official

c. ensure that the complaint is entered in the complaint database

3. Within 3 business days of receipt of the complaint, the Title VI Manager will contact the complainant by telephone to set up an interview.

4. The complainant will be informed that they have a right to have a witness or representative present during the interview and can submit any documentation he/she perceives as relevant to proving his/her complaint.

5. If DRPT has assigned staff to assist with the investigation, the Title VI Manager will offer an opportunity to participate in the interview.

6. The alleged discriminatory service or program official will be given the opportunity to respond to all aspects of the complainant's allegations.

7. The Title VI Manager will determine, based on relevancy or duplication of evidence, which witnesses will be contacted and questioned.

8. The investigation may also include:
   a. investigating contractor operating records, policies or procedures
   b. reviewing routes, schedules, and fare policies
   c. reviewing operating policies and procedures
   d. reviewing scheduling and dispatch records
   e. observing behavior of the individual whose actions were cited in the complaint

9. All steps taken and findings in the investigation will be documented in writing and included in the complaint file.

10. The Title VI Manager will contact the complainant at the conclusion of the investigation, but prior to writing the final report, and give the complainant an opportunity to give a rebuttal statement at the end of the investigation process.

11. At the conclusion of the investigation and within 60 days of the interview with the complainant, the Title VI Manager will prepare a report that includes a narrative description of the incident, identification of persons interviewed, findings, and recommendations for disposition. This report will be provided to the Authorizing Official, DRPT, and, if appropriate, GoochlandCares’ 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 GoochlandCares. 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
GoochlandCares 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.

Appendix D – List of Investigations, Lawsuits, and Complaints
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 GoochlandCares 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.

GoochlandCares 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.

GoochlandCares will take the following steps to ensure that minority, low-income, and LEP members of the community have meaningful access to public outreach and involvement activities, when considering any major program changes, including those conducted as part of the planning process for proposed changes in services, fares, and facilities development.

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.

Public notices are issued to:

- announce opportunities to participate or provide input in planning for service changes, fare changes, new services, and new or improved facilities (early in the process)
- announce the formal comment period on proposed major service reductions and fare increases with instructions for submitting comments including a public hearing (or opportunity for a public hearing with instructions for requesting a hearing if this is the LOTS’ local policy) (at the end of the planning process)
- announce impending service and fare changes (after plan has been finalized)
- announce intent to apply for public transit funding from DRPT, and to announce the formal comment period on the proposed program of projects, with a public hearing (or opportunity for one) (annually in advance of submitting the ATP)

- Posting public notices as described above at all GoochlandCares facilities, Goochland Community Services Board, Goochland Public Library, Goochland Department of Social Services and in all vehicles.
- Sending news releases to the Goochland Gazette, as well as community-based organizations that serve persons protected under Title VI and which publish newsletters.
- Conducting in-person outreach upon request at public meetings, community-based organizations, human service organizations which assist low income and LEP persons, places of worship, service organization meetings, cultural centers, and other places and events that reach out to persons protected under Title VI. The availability of GoochlandCares staff for such speaking engagements is posted on the agency’s website.
- Conducting public hearings at locations and meeting times that are accessible.
- Conducting annual customer satisfaction surveys which are distributed to passengers on vehicles.

The above activities are the responsibility of GoochlandCares Senior Staff which includes the Executive Director, Director of Finances, Development Director, Volunteer Coordinator, Free Clinic Director and Family Services Director.
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 13116, Improving Access to Services for Persons with Limited English Proficiency (LEP). This Executive Order requires federal agencies receiving financial assistance to address the needs of non-English speaking persons. The Executive Order also establishes compliance standards to ensure that the programs and activities that are provided by a transportation provider in English are accessible to LEP communities. This includes providing meaningful access to individuals who are limited in their use of English. The following LEP language implementation plan, developed by GoochlandCares is based on FTA guidelines.

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

According to the Virginia Department of Rail and Public Transportation’s consultant the population for GoochlandCares’ service area is 20,134. The LEP population is 397 or 2% of the overall population.

Additionally, 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 Goochland Cares’ service area. The agency’s service area includes a total of 345 (1.65%) persons with Limited English Proficiency (those persons who indicated that they spoke English less than “very well,” in the 2011-2015 ACS
The 2011-2015 ACS data was used due to the lack of LEP by language group data for the 2012-2016 ACS estimates.

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

### Table 1 - LEP Individuals by Language Spoken

<table>
<thead>
<tr>
<th>Language</th>
<th>Number of LEP Population</th>
<th>Percent of County Population Speaking Language</th>
<th>Percent of LEP Population Speaking Language</th>
</tr>
</thead>
<tbody>
<tr>
<td>Spanish or Spanish Creole</td>
<td>179</td>
<td>0.86%</td>
<td>51.88%</td>
</tr>
<tr>
<td>Korean</td>
<td>34</td>
<td>0.16%</td>
<td>9.86%</td>
</tr>
<tr>
<td>German</td>
<td>29</td>
<td>0.14%</td>
<td>8.41%</td>
</tr>
<tr>
<td>African languages</td>
<td>26</td>
<td>0.12%</td>
<td>7.54%</td>
</tr>
<tr>
<td>Greek</td>
<td>24</td>
<td>0.12%</td>
<td>6.96%</td>
</tr>
<tr>
<td>Chinese</td>
<td>23</td>
<td>0.11%</td>
<td>6.67%</td>
</tr>
<tr>
<td>French</td>
<td>19</td>
<td>0.09%</td>
<td>5.51%</td>
</tr>
<tr>
<td>Arabic</td>
<td>11</td>
<td>0.05%</td>
<td>3.19%</td>
</tr>
<tr>
<td>Total LEP Population</td>
<td>345</td>
<td>1.65%</td>
<td></td>
</tr>
<tr>
<td>Total County Population</td>
<td>20,869</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

The most spoken language group among LEP individuals is Spanish or Spanish Creole (179). No language group surpasses the Safe Harbor Provision. Figure 1 maps the percentage of LEP individuals by Census Block Group. There are no significant percentages of LEP individuals in Goochland 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

GoochlandCares reviewed the relevant benefits, services, and information provided by the agency and determined the extent to which LEP persons have come into contact with these functions through one or more of the following channels:

- Contact with transit vehicle operators;
- Calls to GoochlandCares' customer service telephone line;
- Visits to the GoochlandCares programs;
- Attendance at community meetings or public hearings hosted by GoochlandCares;
- Contact with the agency's ADA complementary paratransit system (including applying for eligibility, making reservations, and communicating with drivers).
GoochlandCares’ client data indicates that 5% of our client’s speak Spanish. We track this information in MedServices, our client database. GoochlandCares is addressing the needs of those clients by ensuring any/all notices posted in vehicles are documented in both languages. All staff are provided with access to internet translation services such as www.googletranslate.com. Additionally, GoochlandCares utilizes a translation phone service.

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)

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

GoochlandCares provides the following programs, activities and services:
- Medical Care
- Food Pantry
- Financial Assistance
- Medical Transportation
- GED/ESL Classes
- Dental Care
- Clothes Closet
- Critical Home Repair
- Case Management
- Sexual and Domestic Violence
- Mental Health Services
- Emergency Housing
- Critical Home Repair
- Case Management
- Sexual and Domestic Violence

Based on past experience serving and communicating with LEP persons and interviews with community agencies, we learned that the following services/routes/programs are currently of particular importance LEP persons in the community.

- Medical Care
- Food Pantry
- Financial Assistance
- Medical Transportation
- Sexual and Domestic Violence
- Dental Care
- Clothes Closet
- Case Management
- GED/ESL Classes
- Mental Health Services
- Emergency Housing
- Critical Home Repair
- Case Management
- Sexual and Domestic Violence

The following are the most critical services provided by GoochlandCares for all customers, including LEP persons.

Medical Care
Food Pantry
Financial Assistance
Medical Transportation
GED/ESL Classes
Dental Care
Clothes Closet
Critical Home Repair
Sexual and Domestic Violence
Mental Health Services
Emergency Housing
Case Management

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

**Costs**

\server02\SharedData\Programs\Medical Transportation\Transportation-Policy-Procedure\Manual\TRN013-Title-VI-Plan_plan_20181108.docx

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The following language assistance measures currently being provided by GoochlandCares:

<table>
<thead>
<tr>
<th>Key documents available in Spanish</th>
<th>Free</th>
<th>Use volunteer translators</th>
<th>10 hours</th>
</tr>
</thead>
<tbody>
<tr>
<td>Interpretation services</td>
<td>Free</td>
<td>Volunteer interpreters</td>
<td>5 hours month</td>
</tr>
<tr>
<td><a href="http://www.translate.google.com">www.translate.google.com</a></td>
<td>Free</td>
<td>n/a</td>
<td>1 hour</td>
</tr>
<tr>
<td>Certified Languages International Phone Interpretation</td>
<td>$1.30 per minute</td>
<td>Staff</td>
<td>1 hour month</td>
</tr>
</tbody>
</table>

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

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

- At least two bi-lingual staff members who speak English and Spanish @ $30,000/year.

**Resources**

The available budget that could be currently be devoted to additional language assistance expenses is $1,000 This amount is likely to remain stable over time.

GoochlandCares has also requested the following additional grant funding for language assistance for our Domestic Violence program from the Virginia Department of Social Services.

In addition, in-kind assistance may be available through volunteers including students from the University of Richmond’s Spanish Classes.

**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 interpretation
- Volunteer translation
- [www.translate.google.com](http://www.translate.google.com)
- Certified Languages International Phone Interpretation
LEP Implementation Plan

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

- Interpretation services for Spanish speaking clients
- Translation of key documents into Spanish including
  - Universal Registration Form
  - Client Handbook (which includes transportation information)
  - Grievance procedures and instructions to access
- [www.translate.google.com](http://www.translate.google.com)
- Certified Languages International Phone Interpretation
- 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 offering the individual a language identification flashcard, having a supply of translated documents on hand, providing contact information for volunteer interpreter and translators, and providing access to the phone interpretation policy and procedures. 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.

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Responding to LEP Callers

Staff who answer calls from the public respond to LEP customers as follows: staff will attempt to obtain a phone number from the caller. If successful, the staff person will call a volunteer interpreter. On a three-way call, they will call the LEP caller back. If the call pertains to transportation, they will ask for the following information: date, time, and location of the appointment; location of pick-up; and phone number and name of rider.
**Responding to Written Communications from LEP Persons**

The following procedures are followed when responding to written communications from LEP persons: a volunteer translator will be contacted to respond to any written communications.

**Responding to LEP Individuals in Person**

The following procedures are followed when an LEP person visits our customer service and administrative office: staff will use language identification flashcard if needed to ascertain the appropriate language. If bilingual staff or volunteer are available, they will respond to client’s inquiries. If bilingual staff/volunteers are not available, staff will access [www.translate.google.com](http://www.translate.google.com) to communicate. When necessary and approved, staff will utilize the phone interpretation line.

The following procedures are followed by operators when an LEP person has a question on board a GoochlandCares vehicle: Van drivers will have previous knowledge of persons with LEP as they will first make contact via phone (see above) or in the office. If a person with LEP does need transportation services without prior authorization, the van driver will contact her/his supervisor for additional instruction.

**Staff Training**

As noted previously, all GoochlandCares 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.
Staff may access Spanish language specific training and continuing education as outlined in the Staff Training Policy.

**Providing Notice to LEP Persons**

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

- Client Handbook
- Signs posted in each vehicle
- Sign posted at each program site
- Sign posted at Registration Office

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

**Monitoring/updating the plan**

This plan will be updated on a periodic basis (at least every three years), based on feedback, updated demographic data, and resource availability.

As part of ongoing outreach to community organizations, GoochlandCares will solicit feedback on the effectiveness of language assistance provided and unmet needs. In addition, we will conduct periodic internal meetings with staff who assist LEP persons, review of updated Census data, and analysis of data obtained via MedServices, our client database of the adequacy and quality of the language assistance provided and determine changes to LEP needs.

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

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

MINORITY REPRESENTATION ON PLANNING AND ADVISORY BODIES
Title 49 CFR Section 21.5(b)(1)(vii) states that a recipient may not, on the grounds of race, color, or national origin, "deny a person the opportunity to participate as a member of a planning, advisory, or similar body which is an integral part of the program."

GoochlandCares does not have transit-related, non-elected planning boards, advisory councils or committees, or similar committees, the membership of which we select.

**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 the DRPT.