Title VI Plan and Procedures

Title VI of the Civil Rights Act of 1964

Southern Area Agency on Aging

SOUTHERN AREA AGENCY ON AGING
Promoting Independence and Quality of Life

PROMOTING INDEPENDENCE AND QUALITY OF LIFE

September 30, 2024

TABLE OF CONTENTS **PAGE**

APPENDICES

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 Southern Area Agency on Aging incorporates nondiscrimination policies and practices in providing services to the public. Southern Area Agency on Aging's Title VI policies and procedures are documented in this plan and its appendices and attachments. This plan will be updated periodically (at least every three years) to incorporate changes and additional responsibilities that arise.

II. OVERVIEW OF SERVICES

Southern Area Agency on Aging (SAAA) is a private not-for-profit agency formed in 1976. SAAA is designated by the Virginia Department for Aging and Rehabilitative Services to serve the cities of Danville and Martinsville, and the counties of Franklin, Henry, Patrick and Pittsylvania. SAAA provides and funds a wide array of services that promote independence and well-being for older individuals. The Agency also serves as an information center for older individuals, individuals with disabilities and their families/caregivers.

SAAA provides Older American Act (OAA) senior transportation services, primarily to individuals 60 years of age and older, by utilizing subcontractor agencies: 1) Ballou Recreation Center/Danville Mass Transit, 2) Franklin County Department of Aging Services, 3) Henry County Parks & Recreation/Senior Services, 4) Martinsville Department of Leisure Services/Senior Services, 5) Pittsylvania County Community Action Agency, 6) Support to Eliminate Poverty (STEP)/Patrick County Transportation. Transportation is provided for the following: congregate nutrition sites, medical appointments (including doctor's appointments, therapy, treatments, and dialysis), grocery shopping and other essential needs (pharmacy, social security, social services).

In addition to OAA senior transportation services, SAAA's Mobility Management Program is a strategic approach to managing transportation resources. Mobility Management transportation services include: Voucher Program – transportation to local non-emergency medical appointments utilizing local private providers, Volunteer Driver Program – transportation to out-of-town medical appoints provided by volunteers, and Miles 4 Vets Program – transportation for local veterans to medical appointments provided by a SAAA contracted private provider.

III. POLICY STATEMENT AND AUTHORITIES

Title VI Policy Statement

Southern Area Agency on Aging 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 Southern Area Agency on Aging 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

09/30/2024
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, Southern Area Agency on Aging 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, Southern Area Agency on Aging confirms to DRPT the agency's commitment to nondiscrimination and compliance with federal and state requirements.

V. PLAN APPROVAL DOCUMENT

Meeting Minutes Approval

SEE APPENDIX I - SAAA Title VI Board Approval Minutes

I hereby acknowledge the receipt of the Southern Area Agency on Aging Title VI Implementation Plan 2024-2027. 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.

Teresa C. Fontaine 09/30/2024

Teresa C. Fontaine, Executive Director **Date**

SOUTHERN AREA AGENCY ON AGING

VI. ORGANIZATION AND TITLE VI PROGRAM RESPONSIBILITIES

The Southern Area Agency on Aging's Quality Assurance Coordinator 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, Southern Area Agency on Aging 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, Southern Area Agency on Aging 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. Southern Area Agency will also maintain and provide to DRPT an annual basis, the log of public outreach and involvement activities undertaken to ensure that minority and low-income people had a meaningful access to these activities.

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

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

3. Annual review of Title VI program

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

4. Dissemination of information related to the Title VI program

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

5. Resolution of complaints

Any individual may exercise his or her right to file a complaint if that person believes that he, she or any other program beneficiaries have been subjected to unequal treatment or discrimination in the receipt of benefits/services or prohibited by non-discrimination requirements. Southern Area Agency on Aging 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 the Agency's Quality Assurance Coordinator.

8. Title VI clauses in contracts

In all federal procurements requiring a written contract or Purchase Order (PO), Southern Area Agency on Aging's contract/PO will include appropriate non-discrimination clauses. The Title VI Manager will work with the Fiscal Director who is responsible for procurement contracts and PO's to ensure appropriate non-discrimination clauses are included.

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

Requirement to Provide a Title VI Public Notice

Title 49 CFR Section 21.9(d) requires recipients to provide information to the public regarding the recipient's obligations under DOT's Title VI regulations and apprise members of the public of the protections against discrimination afforded to them by Title VI. At a minimum, Southern Area Agency on Aging 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. (including Spanish Translation).

SEE APPENDIX A- Title VI Notice to the Public

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

SEE APPENDIX G – Title VI Notice to the Public, Spanish Translation

VIII. Title VI Complaint Procedures

Requirement to Develop Title VI Complaint Procedures and Complaint Form.

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

Any individual may exercise his or her right to file a complaint with Southern Area Agency on Aging 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.

Southern Area Agency on Aging includes the following language on all printed information materials, on the agency's website, in press releases, in public notices, in published documents, and on posters on the interior of each vehicle operated in passenger service:

> ***The Southern Area Agency on Aging (SAAA) 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 of the Civil Rights Act of 1964***.
>
> ***For additional information on Southern Area Agency on Aging's nondiscrimination policies and procedures, or to file a complaint, please visit the website at www.southernaaa.org or SAAA, Quality Assurance Coordinator, 1075 Spruce Street, Martinsville, Virginia 24112.***
>
> 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 included within Southern Area Agency on Aging's Mobility Management brochure.

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 Southern Area Agency on Aging, 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). SAAA will provide complaint forms in English and, if needed, in formats accessible to individuals with disabilities and appropriate languages for LEP persons.
    c. The complaint should include:
        - The name of the agency/subcontractor the complaint has been filed against (if not SAAA directly),
        - 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 Southern Area Agency on Aging Title VI Manager at 1075 Spruce Street, Martinsville, VA 24112 or by email at info@southernaaa.org.
    e. Complaints received by any other employee of Southern Area Agency on Aging 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 (with an interpreter, if needed/available) and the Title VI Manager (or other SAAA staff members with Title VI responsibilities) 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 Southern Area Agency on Aging 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, Southern Area Agency on Aging'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 Southern Area Agency on Aging. 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 Form

IX. 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 Southern Agency on Aging 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.

Southern Area Agency on Aging 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.

Southern Area Agency on Aging 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 in 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. It is noted that Southern Area Agency on Aging has adopted one public outreach practice, based on the nature of this private non-profit's provision of transportation services (i.e., non-public transportation services).

SOME OF THOSE EFFECTIVE PUBLIC OUTREACH PRACTICES INCLUDE:

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

b. 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.

c. Participation and coordination with the Latino Task Force - A Latino Task Force is operational in the Martinsville/Henry County part of SAAA's service area. The Latino Task Force, made up of community representatives from the local Latino community and representatives from the Health Department and other human services agencies, is active in health education, increasing cultural awareness and ensuring that members of the Latino community are aware of community services. SAAA has participated in community events planned by the Latino Task Force and will continue to do so.

SEE APPENDIX E – Summary of Outreach Efforts

X. 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 Southern Area Agency on Aging is based on FTA guidelines.

As required, Southern Area Agency on Aging developed a written LEP Plan (below). Using American Community Survey (ACS) Census data, Southern Area Agency on Aging 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 (2018-2021)

Data from the U.S. Census Bureau's American Community Survey (ACS) were obtained through www.census.gov by Southern Area Agency on Aging's service area. The agency's service area includes a total of 228,580 total populations (of Planning District Twelve) with 4,137 (1.81%) of the total population reported as persons with Limited

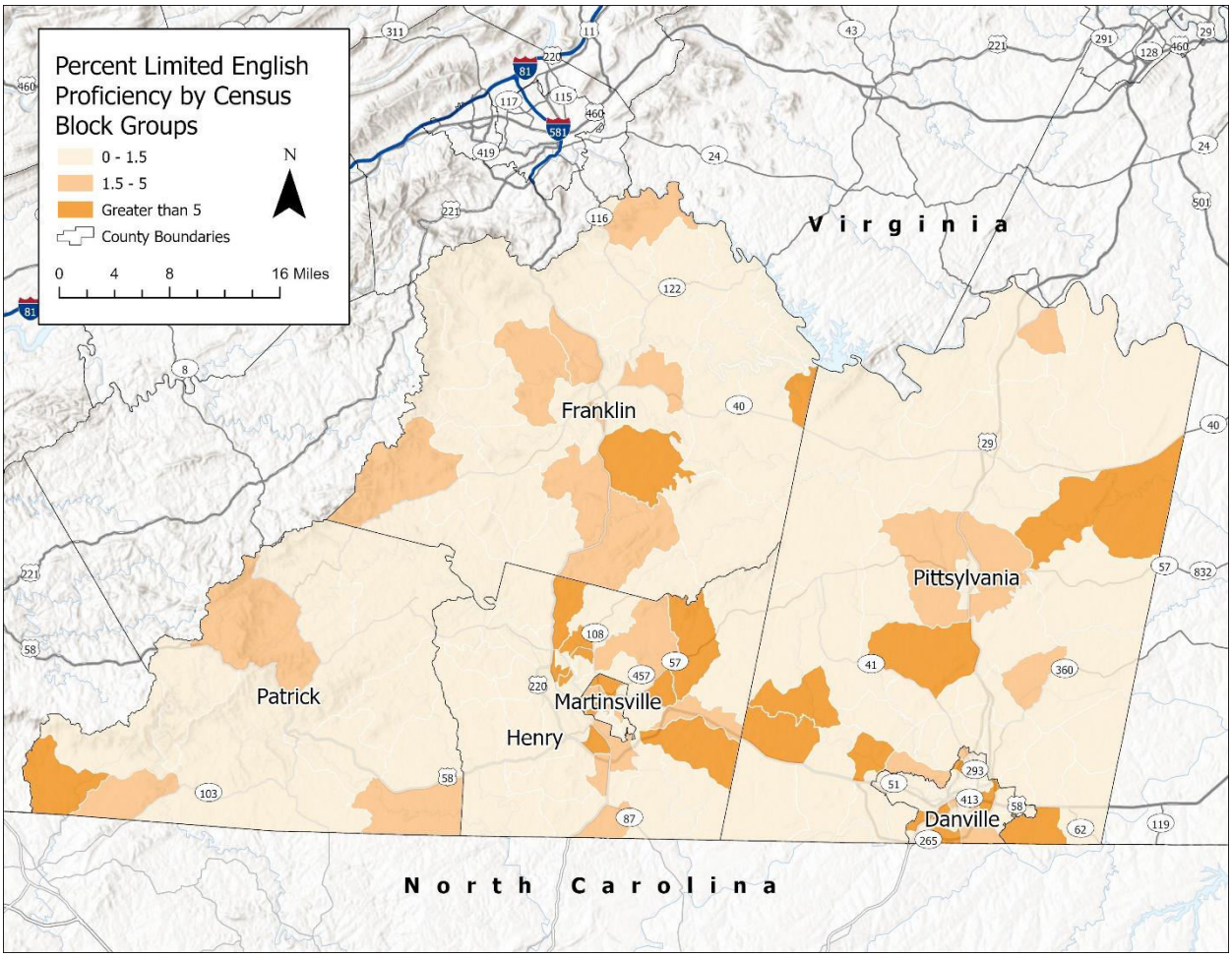
English Proficiency (those persons who indicated that they spoke English "less than very well," in the 2018-2022 ACS Census).

Information from the 2018-2022 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: Number of LEP Population

Southern Area Agency on Aging Service Area			
Language	**Number of LEP Population**	**Percent of Service Area Population Speaking Language**	**Percent of LEP Population Speaking Language**
Spanish	3,328	1.46%	80.44%
French, Haitian, or Cajun	46	0.02%	1.11%
German or other West Germanic languages	63	0.03%	1.52%
Russian, Polish, or other Slavic languages	7	0.00%	0.17%
Other Indo-European languages	206	0.09%	4.98%
Korean	7	0.00%	0.17%
Chinese (incl. Mandarin, Cantonese)	47	0.02%	1.14%
Vietnamese	91	0.04%	2.20%
Tagalog	92	0.04%	2.22%
Other Asian and Pacific Island languages	98	0.04%	2.37%
Arabic	124	0.05%	3.00%
Other and unspecified languages	28	0.01%	0.68%
Total LEP Population	4,137	1.81%	
Total Service Area Population	**228,580**		

Figure 1: Percentage of LEP by Census Block Group



Spanish (3,328) is the only language that is spoken by over 5% or 1,000 persons in the LEP population. Figure 1 shows the percentage of LEP by Census Block Group. There are large percentages of LEP persons across the service area, but especially around Martinsville and Danville, and in other parts of Henry and Pittsylvania counties.

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

Southern Area Agency on Aging 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; - zero reported
- Calls to Southern Area Agency on Aging's (or its transportation services contractor) customer service telephone lines; - zero calls received and reported

Although we have determined that no direct contact with LEP persons requesting assistance have been received by SAAA (or its transportation services contractor) 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, the Agency uses a language identification flashcard based on that which was developed by the U.S. Census. The following resource is also used: https://www.lep.gov/index.htm

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

Southern Area Agency on Aging provides the following programs, activities and services:

Fixed route and demand response Older American Act (OAA) transportation to senior nutrition sites, dialysis and physical therapy treatments, other medical appointments, necessary shopping trips and agency sponsored socialization and recreational activities. Through our subcontractors and directly, SAAA also provides services, (such as in-home care, nutrition programs, socialization and recreation, disease prevention and health promotion, emergency services, volunteer programs, insurance counseling and public information and education activities that promote independence and well-being for older adults, persons with disabilities and their caregivers that enable citizens to continue living independently in their homes.

SAAA's Mobility Management Program is a coordinated effort to manage transportation resources and enhance services. The Miles 4 Vets Program provides disabled and senior veterans transportation for medical appointments. The Volunteer Driver service provides transportation through volunteers to out-of-town non-emergency medical trips, and the Voucher Program provides transportation for non-emergency local medical appointments using local private providers. These programs enhance our OAA Senior Transportation services through coordination.

Based on past experience serving and communicating with LEP persons and interviews with community agencies, [*as well as questionnaires or direct consultations with LEP persons (if applicable, e.g. through focus groups or individual interviews facilitated/interpreted by a community agency)*], we learned that the following services/routes/programs are currently of particular importance LEP persons in the community. N/A

The following are the most critical services provided by Southern Area Agency on Aging for all customers, including LEP persons.

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

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

Costs

Language assistance measures are currently not being provided by Southern Area Agency on Aging. Based on the analysis of demographic data and contact with community organizations and LEP persons, Southern Area Agency on Aging has determined that, at this time, minimal services are needed to provide meaningful access: We anticipate that these activities and costs will increase as demand increases and that the need for the following will increase:

- Information may need to be translated into additional languages,
- Oral or written language services should be provided
- Existing language assistance needs to be made available on a more widespread basis.
- All SAAA staff can be provided with a list of available language assistance services and additional information and referral resources, updated annually, as needed and appropriate.

No cost estimates are currently available.

Resources

The available budget that could be currently be devoted to additional language assistance expenses is $0 dollars. This amount is likely be stable over time.

Southern Area Agency on Aging has also requested the following additional grant funding for language assistance: N/A

A Latino Task Force is operational in the Martinsville/Henry County part of SAAA's service area. The Latino Task Force, made up of community representatives from the local Latino community and representatives from the Health Department and other human services agencies, is active in health education, increasing cultural awareness and ensuring that members of the Latino community are aware of community services. SAAA has participated in community events planned by the Latino Task Force and is aware that written or oral language translation could be negotiated on a volunteer basis or for a small stipend.

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:

- Language Line
- Language Assistance Services, Martinsville Henry County Coalition for Health and Wellness (See APPENDIX H)
- New hire staff positions will include bilingual (English/Spanish) as a plus (rather than requirement) whenever SAAA is seeking applicants for newly created or vacant positions.

LEP Implementation Plan

Through the four-factor analysis, Southern Area Agency on Aging has determined that the following types of language assistance are most needed and feasible:

- Attempt to hire bilingual staff with competency in spoken and written Spanish.
- Language Line Translation Services for telephone contacts.
- Language Assistance Services, Martinsville Henry County Coalition for Health and Wellness (See APPENDIX H)

Staff Access to Language Assistance Services

Agency staff who come into contact with LEP persons can access language services by transferring a call to bilingual staff (if available). 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: Staff would transfer a call to bilingual staff (if available).

Responding to Written Communications from LEP Persons

The following procedures are followed when responding to written communications from LEP persons: Staff would forward written communication to bilingual staff (if available).

Responding to LEP Individuals in Person

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

To date, on those rare occasions when LEP persons have visited our office, they have been accompanied by a bilingual family member or friend who serves as translator for the LEP person as well as the SAAA Staff conducting the interview. If an LEP person is not

accompanied by a bilingual person, SAAA staff will direct the visitor to bilingual staff, if available and/or use of language translation services if appropriate and available.

The following procedures are followed by operators when an LEP person has a question on board a Southern Area Agency on Aging's transportation service owned/operated vehicle:

SAAA may use a variety of resources including: the use of language identification flashcard if needed, Language Line, Language Assistance Services, bilingual operating staff if available, community translation resources, and the availability of translated information on board vehicles and/or volunteer translation assistance from fellow passengers may be used.

Staff Training

As noted previously, all Southern Area Agency on Aging staff are provided with a list of available language assistance services and additional information and referral resources, updated annually.

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

- A summary of the transportation 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.

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

On occasions, one local community college in SAAA's service area provides a non-credit conversational Spanish course. College faculty along with members of the local Latino Task Force designed the curriculum. Members of SAAA staff have taken the course, with the Agency paying the tuition costs. Such opportunities available in our area, in the future, will continue to be utilized by Southern Area Agency on Aging.

Providing Notice to LEP Persons

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

- through signs which will be posted in our customer service and administrative offices.
- through ongoing outreach efforts to community organizations, schools, and religious organizations.
- SAAA's contracted transportation service provider will be responsible for (and agree to) posting signs on all vehicles owned, operated, and titled to SAAA.

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

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, Southern Area Agency on Aging 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, formal studies of the adequacy and quality of the language assistance provided, and determine changes to LEP needs.

In preparing the triennial update of this plan, Southern Area Agency on Aging 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, Southern Area Agency on Aging 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 Southern Area Agency on Aging will attempt to identify the most cost-effective approaches.

As the community grows and new LEP groups emerge, Southern Area Agency on Aging 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."

Southern Area Agency on Aging currently has an Advisory Council, a Board of Directors, SAAA serves on the MHC Latino Task Force, and we serve on multiple area Transportation Task Force Committees.

Advisory Council members are solicited throughout SAAA's service area. Specific areas that are targeted, for recruitment of advisory council members, include representatives of organizations that come in contact with older persons or individuals with disabilities, representatives of health care providers, and citizen representatives (especially individuals who receive services provided or funded by SAAA).

Members of the Agency's Board of Directors are appointed by the local jurisdictions served by Southern Area Agency on Aging.

Participation in the area Latino and Transportation Task Force includes efforts to engage representatives of public and private transportation providers, citizen representation, and other parties interested in transportation issues.
Generally speaking, as a designated Area Agency on Aging, SAAA receives federal Older Americans Act dollars, which requires that the Agency engage in targeting and outreach efforts to ensure that minorities receive services, or have an opportunity to be informed of available services. Therefore, SAAA has developed specific outreach efforts to reach minority populations, for example, sending notices regarding services to minority churches, and clubs and organizations that traditionally engage minority populations as part of their membership. SAAA will continue to use these targeting methods to reach minorities, whether it be for services or for representation on the Agency's Advisory Council and other special groups led by the Agency.

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

Title VI of the Civil Rights Act of 1964 prohibits discrimination based on race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that "no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in. be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance" (42 U.S.C. Section 2000d).

Southern Area Agency on Aging is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transportation services based on race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702. lB. If you feel, you are being denied participation in or being denied benefits of the transportation services provided or funded by Southern Area Agency on Aging, or otherwise being discriminated against because of your race, color, national origin, gender, age, or disability, our contact information is:

Katherine V. Trout
Quality Assurance Coordinator
Southern Area Agency on Aging
1075 Spruce Street, Martinsville, VA 24112
Phone: 276.632.6442 Toll Free: 800.468.4571
Fax: 276.632.6252
E-Mail: ktrout@southernaaa.org

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

The following list represents the locations whereby Southern Area Agency on Aging (SAAA) has posted its Title VI Notice to the Public:

- **Website of Southern Area Agency on Aging -www.southernaaa.org**

- **Reception Area Bulletin Board at Southern Area Agency on Aging @ 1075 Spruce Street, Martinsville, VA 24112**

- **Conference/Meeting Room of Southern Area Agency on Aging @ 1075 Spruce Street, Martinsville, VA 24112**

- **Transportation vehicles owned, operated, and titled to Southern Area Agency on Aging in its provision of contracted transportation services.**

APPENDIX C: Title VI Complaint Form

Southern Area Agency on Aging

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):

[ ] Race [ ] Color [ ] 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? [ ] Yes [ ] No If yes, check all that apply: [ ] Federal Agency: _____ [ ] Federal Court _____ [ ] State Agency _____ [ ] State Court _____ [ ] 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

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

Southern Area Agency on Aging
Title VI Compliance Officer
1075 Spruce Street
Martinsville, VA 24112

APPENDIX D: Title VI of the Civil Rights Act of 1964

Investigations, Lawsuits and Complaints

	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

As a part of Southern Area Agency on Aging's Title VI Plan and Procedures, the following describes outreach activities planned under our Public Participation Plan.

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

b. 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.

c. Participation and coordination with the Latino Task Force - A Latino Task Force is operational in the Martinsville/Henry County part of SAAA's service area. The Latino Task Force, made up of community representatives from the local Latino community and representatives from the Health Department and other human services agencies, is active in health education, increasing cultural awareness and ensuring that members of the Latino community are aware of community services. SAAA has participated in community events planned by the Latino Task Force and will continue to do so.

APPENDIX F: REPRESENTATION ON BOARDS, COUNCILS AND COMMITTEES BY RACE

Board, Council, Committee	Black or African American	White/ Caucasian	Latino/ Hispanic	American Indian or Alaska Native	Asian	Native Hawaiian or other Pacific Islander	Other *Note	Totals
Board of Directors	**3**	**7**	**0**	**0**	**0**	**0**	**0**	**10**
% of Board of Directors	**30%**	**70%**	**0**	**0**	**0**	**0**	**0**	**100**
Advisory Council	**3**	**8**	**0**	**0**	**0**	**0**	**0**	**11**
% of Advisory Council	**27%**	**73%**	**0**	**0**	**0**	**0**	**0**	**100**

Note – Other races reported:

APPENDIX G: Título VI Aviso al Público

El título VI de la ley de Derechos Civiles de 1964, prohíbe la discriminación basada en raza, color o nacionalidad de origen, en programas y actividades que reciban Asistencia Financiera Federal. Específicamente, el título VI establece que: "ninguna persona en los Estados Unidos, por razón de raza, color o nacionalidad de origen, será excluida de participar, ser negada de los beneficios, o ser sujeto de discriminación para recibir ayuda de cualquier programa o actividad de Asistencia Financiera Federal"(42 U.S.C. sección 2000 d).

Southern Area Agency on Aging (Agencia del Área Sur sobre Envejecimiento) se compromete a garantizar que: ninguna persona sea excluida de la participación, o le sean negados los beneficios de sus servicios de transporte, sin importar raza, color o nacionalidad de origen, protegido por el título VI de la Administración de Tránsito Federal (FTA) circular 4702. lB. Si usted siente que, se le ha sido negada la participación o beneficios de los servicios de transporte, proporcionados o financiados por Southern Area Agency on Aging, o de alguna manera haya sido discriminado debido a su raza, color, país de origen, sexo, género, edad, o discapacidad, por favor contáctenos. Nuestra información de contacto es:

Katherine V. Trout
Quality Assurance Coordinator
Southern Area Agency on Aging
1075 Spruce Street, Martinsville, VA 24112
Phone: 276.632.6442 Toll Free: 800.468.4571
Fax: 276.632.6252
E-Mail: ktrout@southernaaa.org

APPENDIX H: Language Assistance Services

To ensure that individuals can communicate in a meaningful manner, we provide reasonable and necessary aids and services free of charge and in a timely manner. This includes language interpretation services to people whose primary language is not English. If you need language interpretation or other language services, please contact us by calling your health center: Bassett Family Practice: 276-629-1076, or Ridgeway Family Health: 276-956-2233, or by emailing info@healthycommunitymhc.org.

Español (Spanish)

ATENCIÓN: si habla español, tiene a su disposición servicios gratuitos de asistencia lingüística. Llame al Bassett Family Practice: 276-629-1076, | Ridgeway Family Health: 276-956-2233

한국어 (Korean)

주의: 한국어를 사용하시는 경우, 언어 지원 서비스를 무료로 이용하실 수 있습니다. Bassett Family Practice: 276-629-1076, | Ridgeway Family Health: 276-956-2233 번으로 전화해 주십시오.

Tiếng Việt (Vietnamese)

CHÚ .: Nếu bạn nói Tiếng Việt, có các dịch vụ hỗ trợ ngôn ngữ miễn phí dành cho bạn. Gọi số Bassett Family Practice: 276-629-1076, | Ridgeway Family Health: 276-956-2233

繁體中文 (Chinese)

注意：如果您使用繁體中文，您可以免費獲得語言援助服務。請致電 Bassett Family Practice: 276-629-1076, | Ridgeway Family Health: 276-956-2233

العربية (Arabic)

ملحوظة :إذا كنت تتحدث اذكر اللغة، فإن خدمات المساعدة اللغوية تتوافر لك بالمجان .اتصل برقم 1076-629-276

Tagalog (Tagalog – Filipino)

PAUNAWA: Kung nagsasalita ka ng Tagalog, maaari kang gumamit ng mga serbisyo ng tulong sa wika nang walang bayad. Tumawag sa Bassett Family Practice: 276-629-1076, | Ridgeway Family Health: 276-956-2233

فارسی (Farsi)

توجه :اگر به زبان فارسی گفتگو می کنید، تسهیلات زبانی بصورت رایگان برای شما فراهم می باشد. با Bassett Family Practice: 276-629-1076, | Ridgeway Family Health: 276-956-2233 تماس بگیرید

አማርኛ (Amharic)

ማስታወሻ: የሚናገሩት ቋንቋ አማርኛ ከሆነ የትርጉም እርዳታ ድርጅቶች፣ በነጻ ሊያግዝዎት ተዘጋ ተዋል፡ ወደ ሚከተለው ቁጥር ይደውሉ Bassett Family Practice: 276-629-1076, | Ridgeway Family Health: 276-956-2233.

اُردُو (Urdu)

خبردار :اگر آپ اردو بولتے ہیں، تو آپ کو زبان کی مدد کی خدمات مفت میں دستیاب ہیں ۔ ال کریں Bassett Family Practice: 276-629-1076, | Ridgeway Family Health: 276-956-2233

Français (French)

ATTENTION : Si vous parlez français, des services d’aide linguistique vous sont proposés gratuitement. Appelez le Bassett Family Practice: 276-629-1076, | Ridgeway Family Health: 276-956-2233

Русский (Russian)

ВНИМАНИЕ: Если вы говорите на русском языке, то вам доступны бесплатные услуги перевода. Звоните Bassett Family Practice: 276-629-1076, | Ridgeway Family Health: 276-956-2233

हिंदी (Hindi)

ध्यान दें: यदि आप हिंदी बोलते हैं तो आपके लिए मु त में भाषा सहायता सेवाएं उपलब् ध हैं। Bassett Family Practice: 276-629-1076, | Ridgeway Family Health: 276-956-2233 पर कॉल क रें।

Deutsch (German)

ACHTUNG: Wenn Sie Deutsch sprechen, stehen Ihnen kostenlos sprachliche Hilfsdienstleistungen zur Verfügung. Rufnummer: Bassett Family Practice: 276-629-1076, | Ridgeway Family Health: 276-956-2233

বাংলা (Bengali)

যিদ করনঃ লক্ষ আপিন বাংলা, কথা বেলত পাের্রন, তাের্হল আপিননিঃখরচায় ভাষা সহায়তা পিরেষবাউপলব্ধ আেছ। ফোন করন Bassett Family Practice: 276-629-1076, | Ridgeway Family Health: 276-956-2233

Ɓàsɔ́ɔ̀-wùɖù-po-nyɔ̀ (Kru)

Dè ɖɛ nìà kɛ dyéɖé gbo: Ɔ jŭ ké m̀ [Ɓàsɔ́ɔ̀-wùɖù-po-nyɔ̀] jŭ ní, nìí, à wuɖu kà kò ɖò po-poɔ̀ ɓɛ́ìn m̀ gbo kpáa. Đá Bassett Family Practice: 276-629-1076, | Ridgeway Family Health: 276-956-2233

Igbo asusu (Ibo)

Ntị: Ọ bụrụ na asụ Ibo, asụsụ aka ọasụ n’efu, defu, aka. Call Bassett Family Practice: 276-629-1076, | Ridgeway Family Health: 276-956-2233

èdè Yorùbá (Yoruba)

AKIYESI: Bi o ba nsọ èdè Yorùbú ọfé ni iranlọwọ lori èdè wa fun yin o. Ẹ pe ẹrọ-ibanisọrọ yi Bassett Family Practice: 276-629-1076, | Ridgeway Family Health: 276-956-2233