



# **Title VI Plan and Procedures**

**Title VI of the Civil Rights Act of 1964**

**Shenandoah Area Agency on Aging (SAAA)**

**2022—2025**

**Adopted**

**January 28, 2022**

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## **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 Shenandoah Area Agency on Aging (SAAA) incorporates nondiscrimination policies and practices in providing services to the public. SAAA'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

The SAAA was incorporated in July of 1975 and is the only comprehensive regional provider of support services that enable older persons to continue living in their own homes. As our older population increases, our services will be even more critical in controlling long term care costs and providing in-home care for our elderly friends and neighbors.

SAAA operates two transportation programs, which perform both deviated fixed route and on demand transportation. These services meet otherwise unmet mobility needs of older adults, people with disabilities, veterans, and people with lower incomes throughout the Northern Shenandoah Valley Planning District of Virginia, which includes the Counties of Clarke, Frederick, Shenandoah, Page and Warren, and the City of Winchester.

Our deviated fixed route transportation supports the operation of the six SAAA Senior Centers within this Planning District. One Senior Center in each jurisdiction. The Senior Centers are open 4 days per week for area seniors aged 60 and older. SAAA provides accessible transportation for the area participants in need of transportation to the Center, and later return to his or her residence.

Our on-demand service addresses many transportation needs including non-emergency medical, non-medical socialization, shopping, college classes, employment, volunteer opportunities, and other Human Services Transportation for seniors aged 60 and older, and for persons 18 and older with disabilities.

A 13-member board of directors governs the Shenandoah Area Agency on Aging, and the mission of the agency is to provide services to help older adults live in their own homes and communities for as long as possible and to avoid institutional placement until absolutely necessary. SAAA receives its funding through federal, state, local jurisdictions, grants, donations, special project funding, and through specific fund-raising events.

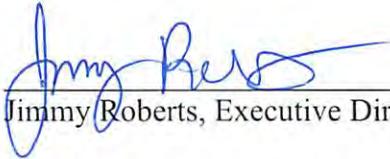
To fulfill its mission, SAAA offers the following services: meals on wheels, congregate meals, transportation to and from the 6 Senior Centers, information and referral, in-home care, comprehensive in-home assessments, respite care for persons with dementia (Alzheimer's), chronic disease self-management (Stanford University), insurance counseling for those who need help with Medicare, an Ombudsman who investigates complaints in nursing homes and assisted living facilities, legal services (Legal Aid), and the on-demand transportation previously described.

### III. POLICY STATEMENT AND AUTHORITIES

#### Title VI Policy Statement

SAAA 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 SAAA 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.

  
Jimmy Roberts, Executive Director

01.28.2022  
Date

#### Authorities

Title VI of the 1964 Civil Rights Act provides that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving federal financial assistance (refer to 49 CFR Part 21). The Civil Rights Restoration Act of 1987 broadened the scope of Title VI coverage by expanding the definition of the terms “programs or activities” to include all programs or activities of Federal Aid recipients, sub recipients, and contractors, whether such programs and activities are federally assisted or not.

Additional authorities and citations include: Title VI of the Civil Rights Act of 1964 (42 U.S.C. Section 2000d); Federal Transit Laws, as amended (49 U.S.C. Chapter 53 et seq.); Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 U.S.C. 4601, et seq.); Department of Justice regulation, 28 CFR part 42, Subpart F, “Coordination of Enforcement of Nondiscrimination in Federally-Assisted Programs” (December 1, 1976, unless otherwise noted); U.S. DOT regulation, 49 CFR part 21, “Nondiscrimination in Federally-Assisted Programs of the Department of Transportation—Effectuation of Title VI of the Civil Rights Act of 1964” (June 18, 1970, unless otherwise noted); Joint FTA/Federal Highway Administration (FHWA) regulation, 23 CFR part 771, “Environmental Impact and Related Procedures” (August 28, 1987); Joint FTA/FHWA regulation, 23 CFR part 450 and 49 CFR part 613, “Planning Assistance and Standards,” (October 28, 1993, unless otherwise noted); U.S. DOT Order 5610.2, “U.S. DOT Order on Environmental Justice to Address Environmental Justice in Minority Populations and Low-Income Populations,” (April 15, 1997); U.S. DOT Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient Persons, (December 14, 2005), and Section 12 of FTA’s Master Agreement, FTA MA 13 (October 1, 2006).

#### **IV. NONDISCRIMINATION ASSURANCE TO DRPT**

In accordance with 49 CFR Section 21.7(a), every application for financial assistance from the Federal Transit Administration (FTA) must be accompanied by an assurance that the applicant will carry out the program in compliance with DOT's Title VI regulations. This requirement is fulfilled when the Virginia Department of Rail and Public Transportation (DRPT) submits its annual certifications and assurances to FTA. DRPT shall collect Title VI assurances from sub-recipients prior to passing through FTA funds.

As part of the Certifications and Assurances submitted to DRPT with the Annual Grant Application and all Federal Transit Administration grants submitted to the DRPT, SAAA 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, SAAA confirms to DRPT the agency's commitment to nondiscrimination and compliance with federal and state requirements.

**V. PLAN APPROVAL DOCUMENT**

**Shenandoah Area Agency on Aging, Inc.**

Board of Directors Resolutions

January 28, 2022

BE IT RESOLVED by the Shenandoah Area Agency on Aging (SAAA) Board of Directors that the Executive Director, Jimmy Roberts, is authorized, for and on behalf of the Shenandoah Area Agency on Aging, hereafter referred to as, SAAA, to approve and submit the updated Title VI Implementation Plan for 2022-2025 to the Department of Rail and Public Transportation, Commonwealth of Virginia, hereafter referred to as, DRPT, and be it

FURTHER RESOLVED, that SAAA is 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. The undersigned duly qualified Board Chairman of the SAAA certifies that the foregoing is a true and correct copy of a Resolution, adopted at a legally convened meeting of the Shenandoah Area Agency on Aging Board of Directors held on the 28th day of January 2022.

  
Charles Thomas, Board Chair

January 28, 2022

\_\_\_\_\_  
Date

## **VI. ORGANIZATION AND TITLE VI PROGRAM RESPONSIBILITIES**

The SAAA's Title VI Manager is the Director of Transportation, and he 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 / Director of Transportation is 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 / Director of Transportation 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 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, as well as service planning and delivery.

### **1. Data collection**

To ensure that Title VI reporting requirements are met, SAAA 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 record 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, SAAA 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. SAAA will also maintain and annually provide to DRPT a log of public outreach and involvement activities undertaken to ensure that minority and low-income people had meaningful access to these activities. This log is maintained at [www.shenandoahaaa.com](http://www.shenandoahaaa.com) in the news menu.

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 dated submission, indicating:

- 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 SAAA 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 and 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. SAAA 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 Data collection (item 1 above) 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 Director of Transportation/Title VI Manager, the Director of Resource Development, the Director of Senior Center Operations, and the Director of Human Resources.

#### **8. Title VI clauses in contracts**

In all federal procurements requiring a written contract or service agreement, SAAA’s contract/service agreement will include appropriate non-discrimination clauses. The Title VI Manager will work with the SAAA Director(s) who is/are responsible for contracts and service agreements 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, SAAA will 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, including the reception area, transportation office, Senior Center bulletin boards, and in federally-funded vehicles.

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).

Shenandoah Area Agency on Aging 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 Shenandoah Area Agency on Aging, or otherwise being discriminated against because of your race, color, national origin, gender, age, or disability, our contact information is:

Shenandoah Area Agency on Aging  
Director of Transportation/Title VI Manager  
Robert D. Haas  
207 Mosby Lane  
Front Royal, Virginia 22630  
Telephone: (540) 551-5705 - Fax: (540) 636-7810  
Email: [r.haas@shenandoahaaa.com](mailto:r.haas@shenandoahaaa.com)  
Website: [www.shenandoahaaa.com](http://www.shenandoahaaa.com)

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

**SEE APPENDIX A-Title VI Notice to the Public**  
**SEE APPENDIX B-Title VI Notice to the Public List of Locations**

## **Title VI Non-Discrimination Statement**

The Shenandoah Area Agency on Aging (SAAA) is committed to ensuring that no person is excluded from participation in or denied the benefits of its services on the basis of race, color or national origin, as protected by Title VI of the Civil Rights Act of 1964.

Any person who believes that he or she has, individually, or as a member of any specific class of persons, been excluded from the participation in, been denied the benefits of, or been otherwise subjected to discrimination under any program or activity for which SAAA provides assistance, and believes the discrimination is based upon race, color or national origin has the right to file a formal complaint.

A complaint must be submitted within 180 days of the alleged discriminatory act. You may file the complaint through email, by phone, or in writing. It must include the following information:

- Your name, address, and contact information (i.e., phone number, email address, etc.)
- How, when, where, and why you believe you were discriminated against.
- The location, names and contact information of any witnesses.
- An SAAA Title VI Complaint Form available on our website can be used (not required).

For complainants who may be unable to file a written complaint, verbal information will be accepted by SAAA at 540-551-5705.

To submit a formal complaint or to request additional information on Title VI obligations for SAAA please contact the Title VI Manager as noted below.

Shenandoah Area Agency on Aging  
Director of Transportation/Title VI Manager  
Robert D. Haas  
207 Mosby Lane  
Front Royal, Virginia 22630  
Telephone: (540) 551-5705 - Fax: (540) 636-7810  
Email: [r.haas@shenandoahaaa.com](mailto:r.haas@shenandoahaaa.com)  
Website: [www.shenandoahaaa.com](http://www.shenandoahaaa.com)

Also available in Spanish on request

También disponible en español a petición

## 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), SAAA has developed 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. The SAAA complaint procedure and/or complaint form is available on our website at [www.shenandoahaaa.com](http://www.shenandoahaaa.com) or can be obtained at the SAAA office located at: 207 Mosby Lane, Front Royal, Virginia 22630. A copy of the SAAA Title VI Complaint Form is attached as **Appendix C**.

Any individual may exercise his or her right to file a complaint with SAAA 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.

SAAA 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:

*SAAA is committed to ensuring that no person is excluded from participation in, or denied the benefits of its 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 SAAA's nondiscrimination policies and procedures, or to file a complaint, please visit the website at [www.shenandoahaaa.com](http://www.shenandoahaaa.com) or contact: SAAA Title VI Manager, (540) 551-5705, 207 Mosby Ln, Front Royal, VA 22630.*

SAAA includes general instructions for filing Title VI complaints at all of the public places identified in our List of Locations. Additionally, instructions are included within SAAA's Transportation Policies.

**SEE APPENDIX C-Title VI Complaint Form**

### **Procedures for Handling and Reporting Investigations/Complaints and Lawsuits**

Should FTA, or DRPT initiate any Title VI investigations, or any Title VI lawsuits or individual complaints be filed against SAAA 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 has developed a form for this purpose. However, it is not required.
  - 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 the Department of Rail and Public Transportation (DRPT) or FTA?)
  - d. The complaint shall be submitted to the SAAA Title VI Manager at 207 Mosby Lane, Front Royal, Virginia 22630, Voice 540-551-5705, Fax number (540) 636-7810 or via email: r.haas@shenandoahaaa.com
  - e. Complaints received by any other SAAA employee 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 Director of Human Resources 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 SAAA 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 SAAA Title VI Manager will offer an opportunity for the assigned representative to participate in the interview.
6. The alleged discriminatory service or program official (SAAA or other) 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 SAAA 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 SAAA Authorizing Official, DRPT, and, if appropriate, SAAA'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 SAAA. 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**

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

**SEE APPENDIX D - Investigations, Lawsuits and Complaints Document**

## **IX. PUBLIC OUTREACH AND INVOLVEMENT**

### **Introduction**

The Public Participation Plan (PPP) is a guide for ongoing public participation endeavors. Its purpose is to ensure that SAAA 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.

SAAA 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.

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

A summary of the SAAA outreach efforts is attached at **APPENDIX E - Summary of Outreach Efforts**

### **SOME OF THOSE EFFECTIVE PUBLIC OUTREACH PRACTICES INCLUDES:**

- a. Public Notice of intent to apply for transit funding from DRPT.
- b. Notification and involvement of local jurisdiction leaders.
- c. Posting public notices and other relevant information in our service vehicles.
- d. 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.
- e. Communication with Human Services agencies and area wide organizations such as United Way, free clinics, etc.
- f. Conducting periodic customer needs and satisfaction surveys.

## **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 SAAA is based on FTA guidelines.

As required, SAAA developed a written LEP Plan (below). Using American Community Survey (ACS) Census data, SAAA 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 combined service area that have limited English Proficiency, as well as the languages they speak. This assessment reveals that two individual jurisdictions within our service area exceed the eligibility requirement for implementing an LEP program.

#### **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](http://www.census.gov) by SAAA's service area. The agency's service area includes a total of 6,904 (3.22%) persons with Limited English Proficiency (those persons who indicated that they spoke English less than "very well," in the 2011-2015 ACS Census). 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.

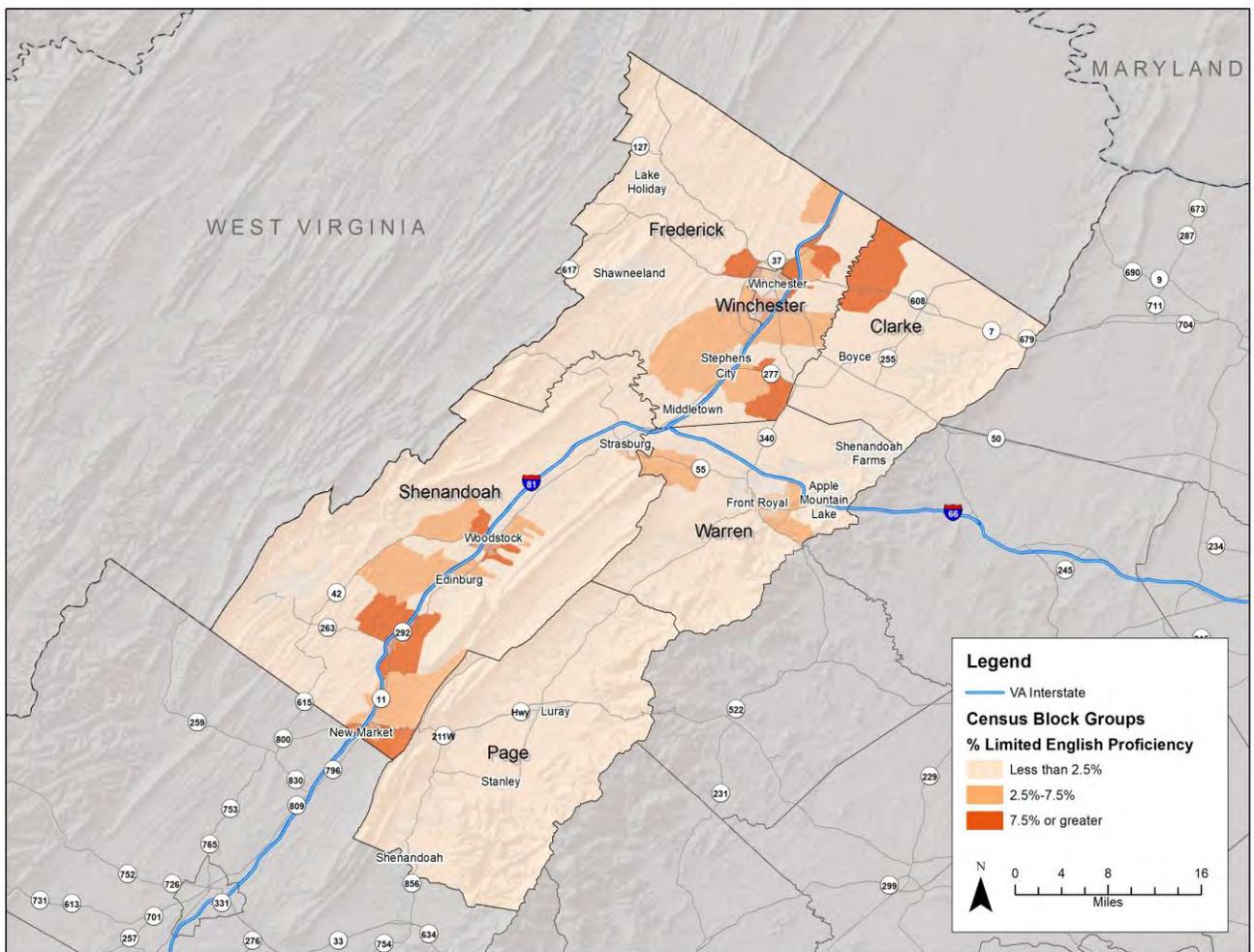
**Table 1 - LEP Individuals by Language Spoken**

SAAA Service Area			
Language	Number of LEP Population	Percent of County Population Speaking Language	Percent of LEP Population Speaking Language
Spanish or Spanish Creole	5,421	2.53%	78.52%
Vietnamese	273	0.13%	3.95%
Chinese	192	0.09%	2.78%
Korean	126	0.06%	1.83%
Arabic	99	0.05%	1.43%
Tagalog	98	0.05%	1.42%
Other Slavic languages	89	0.04%	1.29%
Persian	63	0.03%	0.91%
French Creole	62	0.03%	0.90%
African languages	58	0.03%	0.84%
German	53	0.02%	0.77%
Polish	43	0.02%	0.62%
Gujarati	38	0.02%	0.55%
Japanese	32	0.01%	0.46%
French	28	0.01%	0.41%
Other Indo-European languages	28	0.01%	0.41%
Thai	25	0.01%	0.36%
Hindi	23	0.01%	0.33%
Tagalog	22	0.01%	0.32%
Other Indic languages	21	0.01%	0.30%
Hungarian	21	0.01%	0.30%
Russian	21	0.01%	0.30%
Urdu	19	0.01%	0.28%
Italian	18	0.01%	0.26%
African languages	12	0.01%	0.17%
Other Asian languages	7	0.00%	0.10%
Other and unspecified languages	5	0.00%	0.07%
Mon-Khmer	4	0.00%	0.06%
Other Pacific Island languages	3	0.00%	0.04%

<b>Total LEP Population</b>	<b>6,904</b>	<b>3.22%</b>	
<b>Total Service Area Population</b>	<b>214,596</b>		

The most spoken language among LEP individuals is Spanish or Spanish Creole (5,421). No other language groups surpass the Safe Harbor Provision. Figure 1 maps the percentage of LEP individuals by Census Block Group. Larger percentages of LEP persons are found in Winchester, Frederick County, and southern Shenandoah County.

**Figure 1 – Percent LEP by Census Block Group**



**Table 2 – Clarke County—LEP Individuals by Language Spoken**

Clarke County			
Language	Number of LEP Population	Percent of County Population Speaking Language	Percent of LEP Population Speaking Language
Spanish or Spanish Creole	136	1.01%	75.98%
Polish	27	0.20%	15.08%
Korean	11	0.08%	6.15%
Mon-Khmer	4	0.03%	2.23%
Urdu	1	0.01%	0.56%
<b>Total LEP Population</b>	<b>179</b>	<b>1.32%</b>	
<b>Total County Population</b>	<b>13,512</b>		

**Table 3 – Frederick County—LEP Individuals by Language Spoken**

Frederick County			
Language	Number of LEP Population	Percent of County Population Speaking Language	Percent of LEP Population Speaking Language
Spanish or Spanish Creole	<b>1,639</b>	2.14%	76.48%
Vietnamese	99	0.13%	4.62%
Korean	60	0.08%	2.80%
Tagalog	58	0.08%	2.71%
Persian	53	0.07%	2.47%
African languages	46	0.06%	2.15%
Arabic	42	0.05%	1.96%
Chinese	31	0.04%	1.45%
Gujarati	21	0.03%	0.98%
Thai	21	0.03%	0.98%
Italian	18	0.02%	0.84%
Urdu	18	0.02%	0.84%
French	16	0.02%	0.75%
Hungarian	10	0.01%	0.47%
Other Indic languages	6	0.01%	0.28%
Other Pacific Island languages	3	0.00%	0.14%
German	2	0.00%	0.09%

<b>Total LEP Population</b>	<b>2,143</b>	<b>2.80%</b>	
<b>Total County Population</b>	<b>76,482</b>		

**Table 4 – Page County—LEP Individuals by Language Spoken**

<b>Page County</b>			
<b>Language</b>	<b>Number of LEP Population</b>	<b>Percent of County Population Speaking Language</b>	<b>Percent of LEP Population Speaking Language</b>
Spanish or Spanish Creole	36	0.16%	33.96%
Hindi	14	0.06%	13.21%
German	11	0.05%	10.38%
Chinese	11	0.05%	10.38%
Persian	10	0.04%	9.43%
Polish	9	0.04%	8.49%
Korean	6	0.03%	5.66%
Tagalog	5	0.02%	4.72%
Thai	4	0.02%	3.77%
<b>Total LEP Population</b>	<b>106</b>	<b>0.47%</b>	
<b>Total County Population</b>	<b>22,623</b>		

**Table 5 – Shenandoah County—LEP Individuals by Language Spoken**

<b>Shenandoah County</b>			
<b>Language</b>	<b>Number of LEP Population</b>	<b>Percent of County Population Speaking Language</b>	<b>Percent of LEP Population Speaking Language</b>
Spanish or Spanish Creole	<b>1,400</b>	3.47%	84.49%
Chinese	69	0.17%	4.16%
Vietnamese	43	0.11%	2.60%
Korean	37	0.09%	2.23%
German	25	0.06%	1.51%
Russian	21	0.05%	1.27%
Other Indo-European languages	21	0.05%	1.27%
French	12	0.03%	0.72%
Japanese	12	0.03%	0.72%

Polish	7	0.02%	0.42%
Tagalog	5	0.01%	0.30%
Other and unspecified languages	5	0.01%	0.30%
<b>Total LEP Population</b>	<b>1,657</b>	<b>4.11%</b>	
<b>Total County Population</b>	<b>40,337</b>		

**Table 6 – Warren County—LEP Individuals by Language Spoken**

Warren County			
Language	Number of LEP Population	Percent of County Population Speaking Language	Percent of LEP Population Speaking Language
Spanish or Spanish Creole	268	0.74%	54.58%
Chinese	58	0.16%	11.81%
Arabic	57	0.16%	11.61%
Vietnamese	39	0.11%	7.94%
Gujarati	17	0.05%	3.46%
German	15	0.04%	3.05%
Korean	12	0.03%	2.44%
Hindi	9	0.02%	1.83%
Japanese	8	0.02%	1.63%
Tagalog	8	0.02%	1.63%
<b>Total LEP Population</b>	<b>491</b>	<b>1.35%</b>	
<b>Total County Population</b>	<b>36,251</b>		

**Table 7 – Winchester City—LEP Individuals by Language Spoken**

Winchester City			
Language	Number of LEP Population	Percent of County Population Speaking Language	Percent of LEP Population Speaking Language
Spanish or Spanish Creole	<b>1,942</b>	7.65%	84.66%
Vietnamese	92	0.36%	4.01%
Other Slavic languages	89	0.35%	3.88%
French Creole	62	0.24%	2.70%

Chinese	23	0.09%	1.00%
Tagalog	22	0.09%	0.96%
Other Indic languages	15	0.06%	0.65%
Japanese	12	0.05%	0.52%
African languages	12	0.05%	0.52%
Hungarian	11	0.04%	0.48%
Other Indo-European languages	7	0.03%	0.31%
Other Asian languages	7	0.03%	0.31%
<b>Total LEP Population</b>	<b>2,294</b>	<b>9.03%</b>	
<b>Total City Population</b>	<b>25,391</b>		

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

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

1. Contact with agency Senior Center Drivers;
2. Contact with Transportation or Senior Center Directors;
3. Calls to SAAA’s customer service or Information and Referral telephone line;
4. Visits to the agency’s offices;
5. Access to the agency’s website;
6. Attendance at community meetings or public hearings hosted by SAAA;
7. LEP contact with the agency’s transportation schedulers (including applying for eligibility, making reservations, and communicating with drivers).

SAAA has extremely limited or no contact with LEP persons in items 1,2,5, or 6 above. Note: regarding item 5, our website is published in English but has a translator function for many languages. To date we have not received a request for an interpreter at any agency or public meetings.

Item 3, 4 and 7: A few times in the past few years we have received calls or visits for information or services from persons who were unable to speak enough English to communicate with our staff person. We do have an employee on staff at the SAAA main office who speaks Spanish fluently and has on several occasions translated for clients visiting or calling the Agency. On other occasions the client has coordinated calls for transportation via Valley Health Systems case workers or nurse navigator translators to help schedule transportation to medical appointments.

SAAA is well aware of the growing number of Spanish language persons who may be contacting us on a more regular basis in the future. We will utilize our staff interpreter, Valley Health

translators and the services of the Blue Ridge Area Health Education Center (AHEC) in order to meet future LEP communication needs. Blue Ridge AHEC is a partner program of the Institute for Innovation in Health and Human Services at James Madison University in Harrisonburg Va. Blue Ridge AHEC's non-profit Community Health Interpreter Service (CHIS) offers area health and human service providers access to trained interpreters on an as-needed basis. The service improves the LEP (Limited English Proficient) community's access to transportation and health care needs.

For hundreds of Shenandoah Valley residents, linguistic and cultural barriers compromise the quality of services and contribute to disparities. Interpretation of the following languages is currently available through CHIS; Arabic, Farsi, Kurdish, Russian, Spanish and Tigrinya. Our LEP plan addresses case-by-case interpretation support initially for Spanish, however we understand that the need for interpretation of other languages may be needed.

SAAA 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 will attempt to identify their language and keep records on contacts to accurately assess the frequency of contact. Although we seldom receive communication in written format, if needed we will use the language identification flashcard, 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**

SAAA provides the following programs, activities and services:

- WellTran Transportation – Sliding scale fee-based transportation for persons with disabilities primarily funded by State and Federal Grants.
- Senior Congregate Transportation to SAAA Senior Centers – Transportation to the 6-Senior Centers throughout Virginia Planning District-7

As an Agency on Aging our services encompass many programs and all are designed to meet the short and long-term health and wellness goals of the elderly. Our WellTran Transportation Program provides non-emergency medical transportation rides to persons 60-years+ and persons 18-years+ with disabilities throughout the counties of Clarke, Frederick, Page, Shenandoah, Warren, and the city of Winchester.

Based on past experience serving and communicating with LEP persons and interviews with community agencies, such as the Northern Shenandoah Valley Regional Commission, United Way, the Valley Health Systems with 3-Hospitals in Planning District 7, Social Services and many other non-profit agencies we have learned that the following services/routes/programs are currently of particular importance LEP persons in the community.

- The WellTran Transportation Program – Low or no cost, on demand, assisted door-to-door transportation available for seniors and persons with disabilities who reside in Planning District 7.

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

- On demand accessible transportation
- Services targeted at low-income persons
- Aging services for homebound seniors

The Shenandoah Area Agency on Aging (SAAA) offers a variety of high-quality services that provide in-home support that delay or prevents a move to more costly long-term care facilities. We support care partners of older adults - spouses and family, including caregivers in their workforce. We facilitate staying active and continuing community service, and enhance the dignity and independence of older persons. Our service area includes the counties of Clarke, Frederick, Page, Shenandoah, Warren, and the city of Winchester.

The SAAA was incorporated in July of 1975 and is the only comprehensive regional provider of support services that enable older persons to continue living in their own homes. As our older population increases, our services will be even more critical in controlling long term care costs and providing in-home care for our elderly friends and neighbors.

SAAA receives federal, state, and local jurisdictional funding, but our needs continually exceed these resources. SAAA supplements our government funding with individual and corporate donations. 100% of donations to SAAA are used to expand and enhance our services.

SAAA's WellTran Transportation service is the most likely service to become important and utilized by the LEP Population of Frederick and Shenandoah Counties, and the City of Winchester. This transportation is available at a very small cost to most clients and is at no cost to those who live below Virginia's establish poverty rate. This service is specifically for persons who cannot drive or have no other mode of transport to their medical appointments, social service or other agencies offering needed services, as well as access to groceries, medicines, and other necessary purchases to remain in their homes and enjoy some sense of independence.

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

##### Costs

The following language assistance measures currently being provided by SAAA are:

- Language translation on Website – No cost to maintain
- Notices posted in all transportation vehicles in Spanish – No measurable cost
- Utilization of SAAA Staff Spanish translator,
- Established access to language interpretation providers– No cost
- Ability to translate any/all documentation in Spanish or other languages upon request – Minimal cost

We anticipate that these activities and costs will increase as follows. With the growing number of LEP persons in our serving area and the growing aging population that SAAA will encounter, increased cost for language translation services may occur. Technology such as telephone translation services and additional utilization of staff to directly assist LEP persons, especially Spanish may be required. Due to the scope of our mission, the services we provide, the total number of people - including LEP persons - that we have served, and the anticipated growth of the LEP community, SAAA will encounter additional costs to provide language translation services.

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

- In the future additional oral and written Spanish language services will be provided on a real time basis. The potential cost is not currently projected.

### ***Resources***

The available budget that could currently be devoted to additional language assistance expenses is not established at this time. A future budget amount is likely to increase over time.

SAAA has not requested grant funding for language assistance to date.

Based on the available resources and the recent history of request for LEP services, the following language assistance measures are feasible and appropriate for our agency at this time:

- Language translation on Website
- Notices in Spanish posted in all transportation vehicles
- Established capability of on-site Staff Spanish interpretation and other available resources
- Ability to translate any/all documentation in Spanish or other languages upon request

SAAA has not needed a contract for interpretation support in the past. Although we can now, as needed, utilize the Community Health Interpreter Service, which is a service of James Madison University. Recruitment of volunteers from within our community to assist us in meeting the future needs of the LEP population is ongoing. Currently we do not anticipate any cost prohibitive issues or significant escalation in demand that will impact our ability to implement our LEP Plan. To date we have not experienced any costs associated with translation or language assistance.

## **LEP Implementation Plan**

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

Types of assistance:

1. Staff Translation Services for telephone contacts - Primarily Spanish

2. In-person translation for transportation eligibility assessments as needed.
3. Translation function on our website.
4. Translation of written materials, primarily translated to Spanish.

### **Staff Access to Language Assistance Services**

Agency staff who come into contact with LEP persons can access language services by using the printed notices and help notes translated in Spanish. Telephone calls can be conferenced with our resident staff interpreter or the Community Health Interpreter Service to provide immediate translation. All scheduling staff members are provided with a list of available language assistance services and referral resources throughout our community. This list will be updated at least annually. SAAA will continue to develop available resources to respond to any increase in requests from the LEP communities. These resources will be made available as necessary, and our capability will be updated at least once each year and provided to the Virginia DRPT along with our annual reports.

### **Responding to LEP Callers**

Staff who answer calls from the public respond to LEP customers as follows: by requesting access to bilingual staff and/or volunteers or through connection to the Community Health Interpreter Service (CHIS) for assistance.

### **Responding to Written Communications from LEP Persons**

The following procedures are followed when responding to written communications from LEP persons: A request for translation of written documents may be accomplished by our staff translator or by using an on-line translation application. If necessary, it may be scanned and sent to CHIS for translation. Replies can be written using our staff resource, translation functions online or use of existing computer applications such as MS Word.

### **Responding to LEP Individuals in Person**

The following procedures are followed when an LEP person visits our customer service or administrative office: Use of bilingual staff or volunteers, or the use of language translation services if appropriate. Use of language identification flashcard can be used for basic communication.

The following procedures are followed by operators when an LEP person has a question on board an SAAA vehicle: Additional assistance is available as needed with use of telephone assistance, bilingual staff or volunteer assistance, or through fellow passengers or caretakers.

### **Staff Training**

As noted previously, SAAA staff are provided with a list of available language assistance services and additional information and referral resources, which are updated annually.

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

1. A summary of the agency's responsibilities under the DRPT's LEP Guidance;
2. A summary of the agency's language assistance plan;
3. 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;
4. 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
5. A description of the agency's cultural sensitivity policies and practices.

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

### **Providing Notice to LEP Persons**

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

1. Through signs posted in our vehicles and in our customer service and administrative offices,
2. Telephone contact with our transportation staff via translators to establish eligibility for service and to schedule a ride,
3. Use of available bilingual staff or volunteers,
4. Translation capability available on our website.

### **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, SAAA 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 and review the adequacy and quality of the language assistance provided, and determine changes to LEP needs.

In preparing the triennial update of this plan, SAAA 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." The modified language assistance monitoring checklist list which SAAA will use when reevaluating or monitoring our LEP service is provided on the following page.

Based on the feedback received from community members and agency employees, SAAA will make incremental changes to the type of written and oral language assistance provided as well as updates 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 SAAA will attempt to identify the most cost-effective approaches.

As the community grows and new LEP groups emerge, SAAA will strive to address the needs for additional language assistance in a timely and efficient method.

## **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.”

SAAA has transit-related, non-elected planning boards, advisory councils or committees, or similar committees, the membership of which we select.

Individuals from throughout the community, who take active interest in all of the SAAA services, including transportation, make up the SAAA Advisory Council. Members represent a cross section of the participants and recipients of our services, as well as the larger community. Members are nominated and, if willing to actively participate, are presented to the Board of Directors for appointment. The general makeup of Council members represents the following:

1. Minority individuals and older individuals residing in rural areas who are participants or who are eligible to participate in programs assisted under the Older Americans Act.
2. Family caregivers of individuals who are eligible participants
3. Representatives of older persons
4. Representatives of service providers
5. Representatives of the business community
6. Representatives of providers of veterans’ health care (if appropriate)
7. Local elected officials
8. Health care provider organization representatives
9. Supportive services provider representatives
10. Individuals with leadership experience in private and voluntary sectors
11. General public

**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 any transportation service delivery about which the complaint was filed. If inequities are discovered during this review, options for reducing the disparity are explored, and service changes are planned and implemented 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 Non-Discrimination Public Notice**

The Shenandoah Area Agency on Aging (SAAA) is committed to ensuring that no person is excluded from participation in, or denied the benefits of its services on the basis of race, color or national origin, as protected by Title VI of the Civil Rights Act of 1964.

Any person who believes that he or she has, individually, or as a member of any specific class of persons, been excluded from the participation in, been denied the benefits of, or been otherwise subjected to discrimination under any program or activity for which SAAA provides assistance, and believes the discrimination is based upon race, color or national origin has the right to file a formal complaint.

A complaint must be submitted within 180 days of the alleged discriminatory act. You may file the complaint through email, by phone, or in writing. It must include the following information:

- Your name, address, and contact information (i.e., phone number, email address, etc.)
- How, when, where, and why you believe you were discriminated against.
- The location, names and contact information of any witnesses.
- An SAAA Title VI Complaint Form available on our website can be used (not required).

For complainants who may be unable to file a written complaint, verbal information will be accepted by SAAA at 540-551-5705.

To submit a formal complaint or to request additional information on Title VI obligations for SAAA please contact the Title VI Manager as noted below.

Shenandoah Area Agency on Aging  
Director of Transportation/Title VI Manager  
Robert D. Haas  
207 Mosby Lane  
Front Royal, Virginia 22630  
Telephone: (540) 551-5705 - Fax: (540) 636-7810  
Email: [r.haas@shenandoahaaa.com](mailto:r.haas@shenandoahaaa.com)  
Website: [www.shenandoahaaa.com](http://www.shenandoahaaa.com)

Also available in Spanish on request

También disponible en español a petición

NOTE: As part of Title VI requirements, SAAA is required to maintain a list of locations where our Title VI Notices have been posted or displayed. This List of Locations, the Complaint Procedures and the SAAA Title VI Plan are readily available upon request.



## **Appendix-B —Title VI Notice to the Public List of Locations**

### **Title VI Notice to the Public List of Locations**

The Shenandoah Area Agency on Aging (SAAA) is committed to ensuring that no person is excluded from participation in, or denied the benefits of its services on the basis of race, color or national origin, as protected by Title VI of the Civil Rights Act of 1964.

SAAA has posted copies of our Title VI Non-Discrimination Statement in full compliance to Title 49 CFR Section 21.9(d) as listed below:

1. SAAA Website: [www.shenandoahaaa.com](http://www.shenandoahaaa.com) under About Us
2. Main Office Building Reception Area at below address
3. Transportation Office at below address
4. All Six Senior Centers in or around the office area or bulletin boards
5. All Federally funded vehicles
6. All privately funded vehicles used for Passenger Transportation

To submit a formal complaint or to request additional information please contact the Title VI Manager as noted below.

Shenandoah Area Agency on Aging  
Director of Transportation/Title VI Manager  
Robert D. Haas  
207 Mosby Lane  
Front Royal, Virginia 22630  
Telephone: (540) 551-5705 - Fax: (540) 636-7810  
Email: [r.haas@shenandoahaaa.com](mailto:r.haas@shenandoahaaa.com)  
Website: [www.shenandoahaaa.com](http://www.shenandoahaaa.com)

Also available in Spanish on request

También disponible en español a petición

## Appendix C — Title VI Complaint Form

### Title VI Complaint Form Shenandoah Area Agency on Aging

<b>Section I:</b>				
Name:				
Address:				
Telephone (Home):			Telephone (Work):	
Electronic Mail Address:				
Accessible Format Requirements?	Large Print		Audio Tape	
	TDD		Other	
<b>Section II:</b>				
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
<b>Section III:</b>				
I believe the discrimination I experienced was based on (check all that apply):				
<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin				
Date of Alleged Discrimination (Month, Day, Year): _____				
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.				
<b>Section IV</b>				
Have you previously filed a Title VI complaint with this agency?			Yes	No





**Appendix D —Investigations, Lawsuits and Complaints Document**

**Title VI List of Investigations, Lawsuits and Complaints**

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



## **Appendix E —SAAA Summary of Outreach Efforts**

### **Summary of Public Outreach Efforts**

SAAA 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. The following efforts are included in our planning.

- a. Determining and identifying what meetings and program activities lend themselves to client public participation.
- b. Scheduling meetings at times and locations, which are convenient and accessible for minority and LEP communities.
- c. Employing different meeting sizes and formats.
- d. 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.
- e. Considering radio or newspaper ads on stations and in publications that serve LEP populations.

Other outreach efforts could include providing a translator for public meetings upon request from LEP individuals and providing a supplemental public notice that is translated for LEP populations. The SAAA website contains Agency news articles as well as information regarding planned meetings, activities, grants, and other information such as; Agency Board, Advisory Council and Staff members, job openings, public notices, volunteer opportunities, legal and non discrimination notices including the complete Title VI Plan. All information is easily available in Spanish and 33 other languages.



## Appendix F – Table Minority Representation on Committees by Race

### Minority Representation on Committees by Race

Committee	Black or African American	White/ Caucasian	Latino/ Hispanic	American Indian or Alaska Native	Asian	Native Hawaiian or other Pacific Islander	Other <i>*Note</i>	Totals
SAAA Advisory Council		10		1				11
% of SAAA Advisory Council		91%		9%				100%

*\*Note – No other races to report*

A number of individuals representing minority groups have been members of the Council in the recent past. Although several minority council members have been recently nominated to serve, they have declined, at this time, due to involvement with other organizations. SAAA values the service of any individual, regardless of race, color, sex or national origin, who will help SAAA continue the mission of the Agency.