

Title VI Implementation Plan

Title VI of the Civil Rights Act of 1964

2021- 2023



Adopted date

March 12,2021

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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 Maryland Transit Administration (MTA) 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 The Arc Prince George's County incorporates nondiscrimination policies and practices in providing services to the public.

II. OVERVIEW OF SERVICES

The Arc identifies, creates, and sustains inclusive communities that embrace and engage individuals and families affected by intellectual and developmental disabilities (IDD).

The Arc is **not** a public transit provider. The passengers we provide transit services to are people who receive funding from the Developmental Disabilities Administration. Our routes are designed to meet the specific needs of our passengers and are not open to the general public. Therefore, it is understood that the statements made in this plan apply to the people we support who are eligible to utilize our transportation services and their families.

The Transportation Department operates with 58 vehicles that transport approximately 235 participants throughout the year, transporting people to their perspective day programs, community activities, employment, and volunteer sites. An additional 51 vehicles from our residential services transports people to their medical appointments, weekend activities, and personal needs. The 58 vehicles travel approximately 2900 miles on an average day. The department will be fully staffed with regular drivers, 1 substitute driver, 1 supervisor, program administrator, and a Director. It provides curb-to curb service throughout Prince George's County. There will be adequate staff that drives people we support to work sites, volunteer sites, community outings, and person-centered activities. Which includes the employment services department, day programs, and for special events on weekends and evenings. The agency has provided transportation services for over 60 years.

The following provides a summary of the agency transportation program:

- Center-Based program—Round trip – to and from home/program, curb-to -curb, 2x day, 5x week;
- Out On the Town—Round trip – to and from Arc location and community activities, door to door, 2x day, 2x week;
- Community Employment and Volunteer Work—Round trip – to and from several work sites, volunteer sites; door to door, 2x day, 5x week;
- Recreation/Community Inclusion—Round trip -community activities; community partnerships activities; 2x day, 5x week;

POLICY STATEMENT AND AUTHORITIES

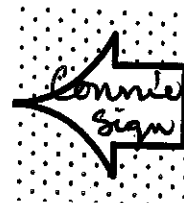
Title VI Policy Statement

The Arc of Prince George's County 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 Arc's 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.

Connie Pace
Signature of Authorizing Official

3/22/21
Date



Authorities

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

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 ASSURANCES TO MTA

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 Maryland Transit Administration (MTA) and Metropolitan Washington Council of Governments (MWCOC) submits its annual certifications and assurances to FTA. The MTA and MWCOC shall collect Title VI assurances from sub recipients prior to passing through FTA funds.

As part of the Certifications and Assurances submitted to MTA and MWCOC at the time of grant application and award, **The Arc of Prince George's County** 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).

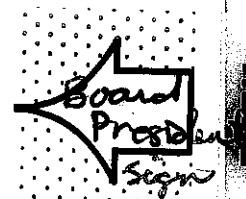
In signing and submitting the assurance, The Arc of Prince George's County confirms to MTA and MWCOC our commitment to nondiscrimination and compliance with federal and state requirements.

V. PLAN APPROVAL DOCUMENT

I hereby acknowledge the receipt of The Arc of Prince George's County Title VI Implementation Plan 2021-2023. 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 The Arc of Prince George's County transportation services on the basis of race, color, or national origin, as protected by Title VI according to C 4702.1B Title VI requirements and guidelines for Federal Transit Administration sub-recipients.

Signature of Authorizing Official
Adeyinka Ogunlegan , Board President
The Arc Prince George's County

Date



See Appendix A for documentation showing that the board of directors has reviewed and approved the Title VI Program.

VI. ORGANIZATION AND TITLE VI PROGRAM RESPONSIBILITIES

Under the authority of The Arc of Prince George's County Executive Director, the Director of Human Resources will serve as the Title VI Manager and is responsible for ensuring implementation of the agency's Title VI program. The Chief of Programs for Vocational & Day Services will serve as the Title VI Manager for the Transportation Department. The Director of Human Resources and the Chief of Programs for Vocational & Day Services will work in conjunction to ensure that Title VI issues are addressed in an expeditious manner. The specific areas of responsibility are described below.

Throughout this plan, it is understood Title VI Manager refers to the Director of Human Resources and the Chief of Programs. The Director of Human Resources will oversee the Title VI Plan for the agency as a whole, while the Chief of Programs will oversee the Title VI Plan for the Transportation Department. This plan specifically addresses the Transportation Department.

Overall Organization for Title VI

The Title VI Manager 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.

Title VI Manager Responsibilities

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, The Arc 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 who are eligible for transportation services had meaningful access to these activities.

2. Annual Report and Updates

As a sub-recipient of FTA funds, The Arc of Prince George's County is required to submit a Quarterly Report Form that documents any Title VI complaints received during the preceding quarter and for each year. The Arc of Prince George's County will also maintain and provide on an annual basis, the log of public outreach and involvement activities undertaken to ensure that minority and low-income people who are eligible for transportation services had meaningful access to these activities.

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

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

3. Annual review of Title VI program

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

4. Dissemination of information related to the Title VI program

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

5. Resolution of complaints

Any individual may exercise his or her right to file a complaint if that person believes that he, she or any other program beneficiaries have been subjected to unequal treatment or discrimination in the receipt of benefits/services or prohibited by non-discrimination requirements. The Arc of Prince George's County will report the complaint to within three business days, 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 will be reported annually (in addition to immediately).

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

The Arc of Prince George's County employees are informed of Title VI policies and procedures upon hiring during the agency orientation. Employees responsible for implementing the Title VI plan as it pertains to transportation, are informed of requirements of Title VI, The Arc's obligations under Title VI (including LEP requirements), required data that must be gathered and maintained and how it relates to the Annual Report and Update to MTA, and MWCOG, and any findings and recommendations from the last MTA, and MWCOG and compliance review.

In addition, training will be provided to employees responsible for implementation of the Title VI plan as it pertains to transportation when any Title VI-related policies or procedures change, or when appropriate in resolving a complaint (which may be for a specific individual or for the entire agency, depending on the complaint).

Title VI training is the responsibility of the Director of Human Resources & Staff Development during agency orientation and the Chief of Programs of Vocational & Day Services as it pertains to employees responsible for implementing the Title VI plan as it pertains to transportation.

Title VI training is the responsibility of the Title VI Managers.

8. Title VI clauses in contracts

In all federal procurements requiring a written contract or Purchase Order (PO), The Arc of Prince George's County contract/PO will include appropriate non-discrimination clauses. The Title VI Manager will work with staff that is/are responsible for procurement contracts and PO's to ensure appropriate non-discrimination clauses are included.

VII. GENERAL REPORTING REQUIREMENTS

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, The Arc of Prince George's County shall disseminate this information to the people eligible for transportation services by posting a Title VI notice on the agency's website, the lobby at Vocational & Day Services, the Transportation Office.

See Appendix B for Title VI Public Notice

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), The Arc of Prince George's County shall develop procedures for investigation 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 Arc's website and at their facilities.

Any individual may exercise his or her right to file a complaint with The Arc of Prince George's County 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 MTA and MWCOG within three business days, 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 MTA.

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.

The Arc of Prince George's County includes the following language on all printed information specific to transportation services, on the agency website (www.thearcofpgc.org), and on posters in the Vocational & Day Services lobby, the Transportation Office.

The Arc of Prince George's County is committed to ensuring that no person is excluded from participation, or denied the benefits of its transportation services on the basis of race, color or national origin, as protected by Title VI in the Federal Transit Administration (FTA) Circular 4702.1B. For additional information on The Arc's nondiscrimination policies and procedures, or to file a complaint, please visit our website at www.thearcofpgc.org or contact Ayesha Henley Director of Human Resources, 1401 McCormick Dr. Largo, MD 20774.

See Appendix C for The Arc's Complaint Form.

Procedures for Handling and Reporting Investigations/Complaints and Lawsuits

Instructions for filing Title VI complaints are posted on the agency's website and in posters on the interior of each federally-funded vehicle operated in passenger service, the Vocational & Day Services lobby, the Transportation Office and are also included printed information specific to transportation services.

Should any Title VI investigations be initiated by FTA , MTA MWCOG, or any Title VI lawsuits are filed against The Arc, 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 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 MTA, MWCOG or FTA?)

- c. The complaint shall be submitted to the Title VI Manager at 7931 Fernham Lane Forestville, MD 20747 and/or cprice@thearcofpgc.org.
 - d. 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.
2. Upon receipt of the complaint, the Title VI Manager will immediately:
 - a. notify MTA, MWCOG (no later than 3 business days from receipt)
 - b. notify The Arc's 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 MTA, MWCOG 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, the MTA, MWCOG, and if appropriate our 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 MTA and MWCOG in the event the complainant wishes to appeal the determination. This letter will be copied to MTA, and MWCOG.
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

TRANSPORTATION-RELATED TITLE VI INVESTIGATIONS, COMPLAINTS, AND LAWSUITS

Background

The Arc of Prince George's County 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 Arc of Prince George's County

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 Arc in response, or final findings related to the investigation, lawsuit, or complaint. This list shall be included in the Title VI Program submitted to MTA and MWCOG every three years and information shall be provided to MTA and MWCOG quarterly and annually.

See Appendix D for Title VI Investigations, Complaints and Lawsuit Tracking Log

PUBLIC OUTREACH AND INVOLVEMENT - Public Participation Plan

Introduction

The Arc of Prince George's County provides transportation services only to people who are supported by other program components. Our "pool" of passengers is pre-determined by the Developmental Disabilities Administration's eligibility process. We are not a public transportation provider. Therefore, a "public" participation plan is not warranted since our transportation services are not offered to the general public. Additionally, the supports and services provided by The Arc of Prince George's County are tailored to the specific needs of the person—group meetings to discuss transportation services are not held. However, individualized discussions are held on as needed basis regarding transportation services for specific people.

The Arc of Prince George's County takes the following steps to ensure Title VI compliance with outreach and involvement from the people who are utilizing our transportation services:

- Written materials can be translated into foreign languages upon request
- The following foreign languages are spoken by some staff members:
 - Spanish
 - French
 - Creole
 - Grebo
 - Kru
 - Several languages native to Africa
- 2021The Arc of Prince George's County has a language bank which provides volunteer translators in many different languages. When staff members are not able to serve as translators, this service is utilized for meetings/discussions.

ACCESS FOR LIMITED ENGLISH PROFICIENT (LEP) PERSONS

LANGUAGE ASSISTANCE PLAN

Introduction and Legal Basis

LEP is a term that defines any individual not proficient in the use of the English language. The establishment and operation of an LEP program meets objectives set forth in Title VI of the Civil Rights Act and Executive Order 13116, Improving Access to Services for Persons with Limited English Proficiency (LEP). This Executive Order requires federal agencies receiving financial

assistance to address the needs of non-English speaking persons. The Executive Order also establishes compliance standards to ensure that the programs and activities that are provided by a transportation provider in English are accessible to LEP communities.

The Arc of Prince George's County has investigated the need for a written LEP Plan. Using 2010 and American Community Survey (ACS) Census data, The Arc of Prince George's County has evaluated data to determine the extent of need for translation services of its vital documents and materials. Based on this data, it has been determined that The Arc is not in need of a written LEP plan. The LEP population in Prince George's County is 16%. We are not a public transportation provider and our transit services are limited to the 235 people to whom we provide supports. Therefore, we do not meet the threshold for requiring an LEP plan.

Although The Arc of Prince George's County does not meet the threshold for a written LEP plan, it is good business sense to effectively communicate with LEP persons. The Arc utilizes the following to effectively communicate with LEP persons regarding our transportation services:

- Written materials can be translated into foreign languages upon request
- The following foreign languages are spoken by some staff members:
 - Spanish
 - French
 - Creole
 - Grebo
 - Kru
 - Several languages native to Africa
- Prince George's County has a language bank which provides volunteer translators in many different languages. When staff members are not able to serve as translators, this service is utilized for meetings/discussions.

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."

The Arc Prince George's County **does not** have transit-related, non-elected planning boards, advisory councils or committees, or similar committees, the membership of which we select.

APPENDIX A

BOARD OF DIRECTORS'

REVIEW & APPROVAL OF

TITLE VI PROGRAM

The Arc Prince George's County Board of Directors**Approval of Title VI Plan****April 22, 2021**

The Arc Board of Directors by majority vote approved the following on April 22, 2021:

We hereby acknowledge the receipt of The Arc George's County Title VI Implementation Plan 2021-2023. We have reviewed and approved the Plan. We are committed to ensuring that no person is Excluded from participation in, or denied the benefits of The Arc Prince George's County's transportation services on the basis of race, color, or national origin, as protected by Title VI according to C4702.18 VI requirements and guidelines for Federal Transit Administration sub-recipients.

Board Members Voting in Affirmative:

Adeyinka Ogunlegan
Becky Tosado
Patrick Gallagher
James Stockton
Kia Silver-Hodge
Yolanda Muckle
Harrison Nwozo, Jr.
Donna Orange
Shirley Patterson
Anjolene Smack-Whaley
Andrea Shorter
Veronica Lee
Tahira Goldson

Board Members Voting Opposition:

None

Board Members Not Voting:

Curtis Randolph
Chris Collins

Submitted by: Adeyinka Ogunlegan, Board President

Board President
Adeyinka Ogunlegan
4/22/21

TITLE VI NOTICE TO THE PUBLIC

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 Arc of Prince George's County 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 The Arc of Prince George's County, or otherwise being discriminated against because of your race, color, national origin, gender, age, or disability, our contact information is:

Connie Price

Chief of Programs, Employment, Day and Transportation Services

The Arc Prince George's County

7931 Fernham Lane, Forestville, MD 20747

Voice: 240-532-6005 ext. 6001 | Fax: 301-456-7042

Email: cprice@thearcofpgc.org

www.thearcofpgc.org

PUBLIC NOTICE LOCATIONS

- The Arc's website, www.thearcofpgc.org
- The Vocational & Day Services
- The Transportation Department Office

APPENDIX C

TITLE VI COMPLAINT FORM



TITLE VI COMPLAINT FORM

Section I:			
Name:			
Address:			
Phone (H):	Phone (W):	Phone (C):	
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, go to Section III.			
If not, please supply the name and relationship of the person for whom you are complaining:			
Please explain why you have filed for a third party:			
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.		Yes	No
Section III:			
I believe the discrimination I experienced was based on (check all that apply):			
<input type="checkbox"/> Race	<input type="checkbox"/> Color	<input type="checkbox"/> National Origin	
Date of Alleged Discrimination (Month, Day, Year): _____			
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s)			

who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form and/or attach additional information.

Section IV:

Have you previously filed a Title VI complaint with The Arc Prince George's County?	Yes	No
---	-----	----

If yes, check all that apply:

Federal Agency: _____ State Agency: _____

Federal Court: _____ Local Agency: _____

State Court: _____

Please provide information about a contact person at the agency/court where the complaint was filed.

Name:

Title:

Agency:

Address:

Telephone:

You may attach any written materials or other information 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 to:

The Arc Prince George's County
Title VI Coordinator
1401 McCormick Dr., Largo, MD 20774

APPENDIX D

INVESTIGATIONS, LAWSUITS,

COMPLAINTS, LEP/LAP LOG

INVESTIGATION, LAWSUIT, COMPLAINT, LEP/LAP LOG

	DATE (MM/DD/YYYY)	SUMMARY (Include basis: race, color or national origin)	STATUS	ACTION(S) TAKEN
INVESTIGATIONS				
1.				
2.				
3.				
LAWSUITS				
1.				
2.				
3.				
COMPLAINTS				
1.				
2.				
3.				
LEP				
1.				
2.				
3.				
LAP				
1.				
2.				
3.				

APPENDIX E

LANGUAGE ACCESS PLAN

The Arc Prince George's County

Language Access Plan

I. Introduction

The Arc of Prince George's County has prepared this Language Access Plan ("LAP" or "Plan"), which defines the actions to be taken by the agency to ensure meaningful access to agency services, programs and activities on the part of persons who have limited English proficiency. The Arc will review and update this LAP in order to ensure continued responsiveness to community needs. This Plan meets objectives set forth in Title VI of the Civil Rights Act and Executive Order 13116, Improving Access to Services for Persons with Limited English Proficiency (LEP).

II. Purpose

The purpose of this plan is to ensure people supported by The Arc of Prince George's County have meaningful access to transportation related services, programs and activities although they may be limited in their English language proficiency.

The Arc is committed to this Language Access Plan as the appropriate response to meeting our clients' needs.

Consistent with the guidance of objectives set forth in Title VI of the Civil Rights Act and Executive Order 13116, Improving Access to Services for Persons with Limited English Proficiency (LEP), a Limited English Proficient ("LEP") person is someone who is not able to speak, read, write or understand the English language at a level that allows him/her to interact effectively with agency staff. People receiving transportation supports maintain the right to self-identify as a LEP person.

III. Agency Description

The Arc of Prince George's county identifies, creates, and sustains inclusive communities that embrace and engage individuals and families affected by intellectual and developmental disabilities (IDD).

The Arc of Prince George's County is not a public transit provider. The passengers we provide transit services to are people who receive funding from the Developmental Disabilities Administration. Our routes are designed to meet the specific needs of our passengers and are not open to the general public. Therefore, it is understood that the statements made in this plan apply to the people we support who are eligible to utilize our transportation services and their families.

The Transportation Department operates with 58 vehicles that transport approximately 235 participants throughout the year. The 58 vehicles travel approximately 2900 miles on an average day. The department will be staffed with adequate regular drivers, 1 substitute driver, 1 supervisor, a program administrator and a Director. It provides curb-to curb service throughout Prince George's County. Other staff members will drive participants to work sites, volunteer sites and community outings. Which includes the employment services department, day programs, and for special events on weekends and evenings Community Supports. The agency has provided transportation services for over 60 years.

The following provides a summary of the agency transportation program:

- Center-Based program—Round trip – to and from home/program, curb-to -curb, 2x day, 5x week;
- Out On the Town—Round trip – to and from Arc location and community activities, door to door, 2x day, 2x week;
- Community Employment and Volunteer Work—Round trip – to and from several work sites, volunteer sites; door to door, 2x day, 5x week;
- Recreation/Community Inclusion—Round trip –community recreation activities; community partnerships activities; 2x day, 5x week;
- Special Events—Vehicles and drivers used by The Arc's Individual Support Services (ISS), People On the Go self-advocacy group, to transport self-advocates and program participants to and from home and various events, seminars, conferences, and classes.

Language Access Plan:

Approach: The agency Language Access Plan shall be fully implemented subject to the availability of fiscal resources to implement said language access plan. This Language Access Plan represents the Arc's administrative blueprint to provide meaningful access to the transportation services, programs and activities on the part of LEP individuals. This Language Access Plan outlines the tasks Arc will undertake to meet this objective.

Language Access Plan:

(1) Agency Language Access Coordinator:

Language Access Committee
 1401 McCormick Dr.
 Largo, MD 20774

(2) Agency Language Access Needs Assessment:

- a. The Arc provides transportations supports to 235 people. We do not meet the 5% threshold for LEP persons.
- b. Language Makeup of Client Population

The Arc does not meet the threshold for LEP persons.

- c. Points of Contact between Agency and Client Population

Employment, Transportation & Day Services
 9700 Martin Luther King Jr. Hwy, Suite G
 Lanham, MD 20706
 301-925-2730 ext.2223
[www.thearcPrince George'scounty.org](http://www.thearcPrinceGeorge'scounty.org)

(3) Language Resources Assessment:

- a. Identification of existing staff who are linguistically, culturally, and technically able to deliver services in a language other than English and/or to serve as interpreters

Although The Arc does not meet the threshold for LEP persons, the following languages are spoken by staff members of The Arc:

- Spanish
- Portuguese
- Creole
- French
- Mandarin Chinese
- Hebrew
- Arabic
- Farsi
- Several languages native to Africa

- b. Community-based resources available to be deployed to assist agency in meeting language access needs

The Arc does not meet the threshold for LEP persons. However, when needed, we

The Arc does not meet the threshold for LEP persons. However, when needed, we utilize the Prince George's County Language Bank. The language bank provides volunteer translators in many different languages. When staff members are not able to serve as translators, this service is utilized for meetings/discussions.

(4) Language Service Protocols:

- a. Although The Arc does not meet the threshold for LEP persons, oral and written translation into other languages is made available when needed.
- b. Although The Arc does not meet the threshold for LEP persons, oral and written translation is provided by staff who are proficient in the needed language or through the language bank.
- c. Although The Arc does not meet the threshold for LEP persons, individuals who have LEP can request translation services.

(5) Vital Document Translation:

Since The Arc does not meet the threshold for LEP persons, we do not have vital document translation. However, documents can be translated on an as needed basis.

(6) Stakeholder Consultations:

Since The Arc does not meet the threshold for LEP persons, stakeholder consultation was not held.

(7) Staff Training:

Although The Arc does not meet the threshold for LEP persons, all staff involved with transportation services are aware of the agency's ability to provide oral and written translation on an as needed basis.

(8) Notice to Public.

The Arc is not a public transit provider; therefore no public notice is warranted. Although The Arc does not meet the threshold for LEP persons, the agency's ability to provide oral and written translation is made available to LEP persons who receive transportation services.

(9) Agency Monitoring:

This plan will be reviewed on an annual basis to determine if The Arc meets the threshold for LEP persons.

(10) Complaints:

Complaints can be filed in writing to:

Gloria Butler, Title VI Manager for the Transportation Department
9700 Martin Luther King Jr, Hwy Suite G
Lanham, MD 20706
gbutler@thearcofpgc.org

Robert Malone

NAME OF AGENCY HEAD

Executive Director

March 12, 2021

DATE