

Title VI
2018 - 2020 Implementation Plan
Title VI of the Civil Rights Act of 1964

The Arc Carroll County



Adopted date
October 1, 2014

Revised
January 8, 2018

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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 Carroll County, a private non-profit **organization**, incorporates nondiscrimination policies and practices in providing transportation services to its clients.

II. OVERVIEW OF SERVICES

The Arc Carroll County, a 501c3 organization, provides a variety of supports to people with intellectual and developmental disabilities in Carroll County. Our funding comes primarily from Maryland's Department of Health and Mental Hygiene - Developmental Disabilities Administration (DDA) and Carroll County Public Schools (CCPS). With respect to both, our "target populations" are directed by referrals (DDA) and assignments (CCPS).

- Community Living - We own nine private residences, allowing 28 individuals to live the community. We assist with all aspects of daily living, including meal preparation, personal care, engagement in social activities, grocery shopping and full administration of healthcare, including transportation (using non MTA vehicles) to/from medical appointments.
- Day & Employment Services -
 - We provide career development and job readiness training, including resume writing and interview practice. We offer a variety of volunteer and transitional work opportunities to help individuals master job skills before seeking employment in the community. Once a job is secured, we provide job coaching to ensure a successful transition to the work environment. We also provide drop-in supports to reinforce learned skills in order to maintain successful employment.
 - For individuals that choose not to seek employment, we offer art classes, life skills training and opportunities to participate in activities in the community.
 - We use MTA-funded vehicles to transport groups of individuals to/from employment, The Arc headquarters and group activities in the community. We also own approximately 30 passenger vehicles that are used to fill time-specific transportation needs. We coordinate with our local transit operator, Carroll Area Transit Services (CATS), to assist in these efforts, giving the individuals as much flexibility for their transportation needs.
- Support Services - we support approximately 74 individuals that live on their own or with family members. Services range from full assistance with personal care, to meal preparation and providing individuals with opportunities to connect with their communities. For many individuals, participating in social activities is very important. We own several passenger vehicles that are used for this purpose. In addition, we provide our staff with mileage reimbursement for use of their own vehicles to transport individuals to activities of their choosing.
- Post-Secondary Education - we assist educational instructors in County high schools with their transition programs for students with intellectual and developmental disabilities. As such, we do not select the students we assist; our staff is assigned to a classroom. Field trips requiring transportation (on a licensed school bus) are inclusive and arranged so that all students can participate.
- Pupil Transportation - we contract with CCPS to provide transportation to approximately 500 students in grades K-12 with special needs. We own 40 school buses to fulfill this obligation. Routes and ridership are assigned by CCPS.

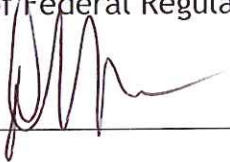
In all respects, our transportation program is non-discriminatory: we arrange and/or provide transportation to individuals as an intrinsic part of our overall services. Much of it is tailored to the specific needs of the individual. Routes are designed for efficiency and economy, so that individuals spend the least amount of time necessary to get to their destination.

III. POLICY STATEMENT AND AUTHORITIES

Title VI Policy Statement

The Arc Carroll 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 Carroll County'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.



Signature of Authorizing Official



Date

Authorities

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

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) submits its annual certifications and assurances to FTA. The MTA shall collect Title VI assurances from sub-recipients prior to passing through FTA funds.

As part of the Certifications and Assurances submitted to MTA at the time of grant application and award, The Arc Carroll 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 Carroll County confirms to MTA our commitment to nondiscrimination and compliance with federal and state requirements.

V. PLAN APPROVAL DOCUMENT

I hereby acknowledge the receipt of The Arc Carroll County Title VI Implementation Plan 2018-2020. 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 Carroll County's 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.

Sherrie W. Bream

Signature of Authorizing Official

1/8/18

Date

Sherrie W. Bream

Name

President, Board of Directors

Title

The Arc of Carroll County

VI. ORGANIZATION AND TITLE VI PROGRAM RESPONSIBILITIES

Under the authority of The Arc Carroll County, the Assistant Director of Quality Assurance will serve as the Title VI Manager and is responsible for ensuring implementation of the agency's Title VI program. The specific areas of responsibility are described below.

Overall Organization for Title VI

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

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 public client group(s) served 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 Carroll County will maintain:

- A database or log of Title VI complaints received. The investigation of and response to each complaint is tracked within the database or log.
- A log of the public outreach and involvement activities undertaken to ensure that minority and low-income people had a meaningful access to these activities.

2. Annual Report and Updates

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

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

- A copy of any compliance review report for reviews conducted in the last three years, along with the purpose or reason for the review, the name of the organization that performed the review, a summary of findings and recommendations, and a report on the status or disposition of the findings and recommendations
- Public Participation Plan (PPP)
- Language Assistance Plan (LAP)
- 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

- Minority representation on Committees by race

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 program beneficiaries, as described in the "Public Outreach and Involvement" section of this document, and in other languages when needed according to the LAP 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 prohibited non-discrimination requirements or to unequal treatment or discrimination in the receipt of benefits/services. The Arc Carroll County will report the complaint to MTA within three business days (per MTA 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 Element 1, Data Collection, and reported annually (in addition to immediately) to MTA.

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 (Element 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), 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 Title VI Manager, Assistant Director of Vocational Services, Assistant Director of Community Services and the Support Services Program Coordinators.

8. Title VI Clauses in Contracts

In all Federal procurements requiring a written contract or Purchase Order (PO), The Arc Carroll County's contract/PO will include appropriate non-discrimination clauses. The Title VI Manager will work with the Executive Director, Deputy Executive Director, Director of Transportation, Director of Human Resources, Assistant Director of Vocational Services and Director of Finance, who is/are responsible for procurement contracts and PO's to ensure appropriate Federal 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 Carroll County shall disseminate this information to the public by posting a Title VI notice on the agency's website, in public areas of the agency's office(s), including the reception desk, meeting rooms, in all Federally-funded vehicles, etc.

A copy of The Arc Carroll County's Public Notice is included as Appendix A - Title VI Notice to the Public; List of Locations.

TITLE VI COMPLAINT PROCEDURES

REQUIREMENT TO DEVELOP TITLE VI COMPLAINT PROCEDURES AND COMPLAINT FORM.

In order to comply with the reporting requirements established in 49CFR Section 21.9(b), The Arc Carroll County shall develop procedures for investigating and tracking Title VI complaints filed against us and will make these procedures for filing a complaint available to members of the public. The Arc Carroll County has also developed a Title VI complaint form. The form and procedure for filing a complaint are available on The Arc Carroll County website and at their facilities.

Any individual may exercise his or her right to file a complaint with The Arc Carroll County if that person believes that he or she have been subjected to unequal treatment or discrimination in the receipt of benefits or services. We will report the complaint to MTA within three business days (per MTA 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 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 Carroll County includes the following language on all printed information materials, on the agency's website, in press releases, in public notices, in published documents, and on posters on the interior of each vehicle operated in passenger service:

The Arc Carroll 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 the Federal Transit Administration (FTA) Circular 4702.1B. For additional information on The Arc Carroll County's nondiscrimination policies and procedures, or to file a complaint, please visit the website at www.arccarroll.com or contact:

Brittany Jacober, Assistant Director of Quality Assurance
180 Kriders Church Rd.
Westminster, MD 21158
410-848-4124 x 114

A copy of The Arc Carroll County's Title VI Complaint Form is attached as APPENDIX B.

Procedures for Handling and Reporting Investigations/Complaints and Lawsuits

Instructions for filing Title VI complaints are posted on the agency's website and provided below. Should any Title VI investigations be initiated by FTA or MTA, or should any Title VI lawsuits be filed against The Arc Carroll County, 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:
 - complainant's name, address, and contact information (i.e., telephone number, email address, etc.)
 - 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)
 - description of the alleged act of discrimination
 - location(s) of the alleged act of discrimination (include vehicle number if appropriate)
 - explanation of why the complainant believes the act to have been discriminatory on the basis of race, color, or 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 or FTA?)
 - c. The complaint shall be submitted to the Title VI Manager at 180 Kriders Church Rd. Westminster, MD 21158 and/or bjacober@arccarroll.com.
 - 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 (no later than 3 business days from receipt)
 - b. notify The Arc Carroll County 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 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, 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 in the event the complainant wishes to appeal the determination. This letter will be copied to MTA.
 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

All sub-recipients shall prepare and maintain a list/log 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/log shall include the date that the transportation-related Title VI investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by the recipient in response, or final findings related to the investigation, lawsuit, or complaint. This

list/log shall be included in the Title VI Program submitted to MTA every three years and information shall be provided to MTA quarterly and annually.

A copy of The Arc Carroll County's Title VI and LEP/LAP List of Investigations, Lawsuits and Complaints is included as Appendix C.

PUBLIC OUTREACH AND INVOLVEMENT - Public Participation Plan

Introduction

The Public Participation Plan (PPP) is a guide for ongoing public participation endeavors. Its purpose is to ensure that The Arc Carroll County 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, 5310 service providers 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.

The Arc Carroll County 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 Arc Carroll County 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.

The Arc Carroll County identifies the following as its target populations: the individuals we support, and their families; individuals with intellectual or

developmental disabilities that are exiting the Carroll County school system at age 18 or older, and their families; adults in Carroll County with autism, and their families.

The Arc Carroll County is a private non-profit agency providing transportation services only to those individuals that receive our services (see Overview of Services - Chapter II). We coordinate with comparable agencies in the county as well as with our local transit provider, CATS, to ensure that individuals are transported to their various destinations timely, in accordance with their needs. We do not offer transportation services to the general public. Thus, a Public Participation Plan for Transportation is unwarranted.

A SAMPLE OF EFFECTIVE PUBLIC OUTREACH PRACTICES INCLUDE:

- a. Educating community civic and volunteer organizations.
- b. Providing tours to the public.
- c. Coordinating with community and faith-based organizations, educational institutions, and other organizations to implement public engagement strategies that reach out specifically to members of affected minority and/or LEP communities.
- d. Considering radio, television, or newspaper ads on stations and in publications that serve LEP populations. Outreach to LEP populations could also include audio programming available on podcasts.
- e. Providing opportunities for public participation through means other than written communication, such as personal interviews or use of audio or video recording devices to capture oral comments.

A copy of The Arc Carroll County's Title VI Public Participation Plan is included as Appendix D.

ACCESS FOR LIMITED ENGLISH PROFICIENT (LEP) PERSONS

LANGUAGE ASSISTANCE PLAN (LAP)

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.

As required, The Arc Carroll County developed a written LAP Plan (below) to address the needs of the LEP population(s) it serves. Using 2011-2015 and American Community Survey (ACS) Census data, The Arc Carroll County 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 Eligible Service Population is the people with disabilities in Carroll County. The 2011-2015 American Community Survey and 2010 Census noted 159,218 residents, of which 5,364 (3.2%) were Hispanic or Latino, 10,394 (6.2%) had a disability and 2,068(1.3%) spoke English Less Than Very Well. From these, it is estimated that of the disability population, 333 are Hispanic or Latino, and 135 speak English Less Than Very Well. Specifically, The Arc Carroll County serves 2 Hispanic and 1 Asian individual of its total population of 185.

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

- Based on this data, it was determined that the frequency with which LEP individuals would come into contact with transportation services is very low. In addition, services are person-centered, to ensure that individuals are transported to their various destinations timely, in accordance with their needs.

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

- Transit Services is important to the LEP population and the population we serve because it's their main mode of transportation. At The Arc Carroll County, transportation is arranged for individuals on an as-needed basis. We coordinate with involved parties (transportation services, employers, staff, families and individuals) to ensure the individual understands pick up/drop times and destinations. We offer ride-along services to help the individual get accustomed to their routine. We also provide an aide on our MTA vehicles to ensure individuals board/exit the vehicle at their appropriate destinations.

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

- The following resources that are available to The Arc Carroll County at a cost include The Language Line, Screiber Translations, Inc, and Ad Astra Inc.
- The following resources that are available to The Arc Carroll County for free include The Arc Maryland Hola! Toolkit and 4 bilingual staff, 3 bilingual in Spanish and 1 bilingual in Russian.

A copy of The Arc Carroll County's Language Access Plan is included as Appendix E.

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

- 1. Please provide a description of your selection process, including recruitment efforts made to encourage the participation of minorities on such committee(s)*
- 2. Please provide a table(s) depicting the racial breakdown of the membership of those committees*

A copy of The Arc Carroll County's Title VI Table Minority Representation on Committees by Race is included as Appendix F.



The Arc Carroll County
180 Kriders Church Road
Westminster, MD 21158-4307

T 410 848-4124 x127
F 410-876-5317
www.arccarroll.com

Achieve with us.

APPENDIX A - TITLE VI NOTICE TO THE PUBLIC; LIST OF LOCATIONS

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 Carroll 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 need more information or feel you are being denied participation in or being denied benefits of the transit services provided by The Arc Carroll County or otherwise being discriminated against because of your race, color, national origin, gender, age, or disability, our contact information is:

Brittany Jacober

Assistant Director of Quality Assurance

The Arc Carroll County

180 Kriders Church Road

Westminster, MD 21158

410-848-4124 x 114

bjacob@arccarroll.com

LIST OF LOCATIONS

agency's website www.arccarroll.com

lobby

conference rooms

Section 5310 vehicles

APPENDIX B - TITLE VI COMPLAINT FORM



The Arc Carroll County - TITLE VI
MANAGER
 180 Kriders Church Road
 Westminster, MD 21158-4307
 T 410 848-4124 x127
 F 410-876-5317
www.arccarroll.com
Achieve with US

TITLE VI and LEP/LAP COMPLAINT FORM

SECTION I: about you			
Name: _____			
Address: _____			
Phone: _____		Email: _____	
Accessible Format Requirements:	Large Print		Audio Tape
	TDD		Other
SECTION II: about the complainant			
Are you filing this complaint on your own behalf?			Yes No
If you answered "yes", please 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 you have obtained permission to file on behalf of a third party.			Yes No
SECTION III: about the event			
I believe the Title VI discrimination 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 discrimination took place. Describe all persons 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. You may attach any written materials or other information that you think is relevant to your complaint.			
SECTION IV: background information			
Have you previously filed a Title VI complaint with this agency?			
Have you previously filed a Title VI complaint with any other Federal, State or local agency, or with any Federal or State court?			Yes No
If yes, check all that apply:			
<input type="checkbox"/> Federal Agency: _____ <input type="checkbox"/> Federal Court <input type="checkbox"/> State Agency: _____ <input type="checkbox"/> State Court <input type="checkbox"/> Local Agency: _____			
Please provide contact information for a person at the agency/court where the complaint was filed:			Yes No
Name: _____ Title: _____			
Address: _____			
Telephone: _____			
SECTION V: required information. Title VI complaints must be filed within 180 days of the event. LEP/LAP complaints must be filed within 30 days of the event.			
Signature: _____		Date: _____	



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APPENDIX C - TITLE VI and LEP/LAP INVESTIGATIONS, LAWSUITS and COMPLAINTS DOCUMENT

Type & Complainant	Date (Mo/Day/Yr)	Summary (include basis of Title VI complaint: race, color or national origin; or LEP/LAP complaint)	Action(s) Taken						Status
			Notifications Made	Complainant Contacted	Interviews Conducted	Complainant Offered Chance for Rebuttal	Final Report written	Complainant Notified of Outcome	
Investigations									
1.									
2.									
Lawsuits									
1.									
2.									
Complaints									
1.									
2.									

APPENDIX D - TITLE VI Public Participation Plan

The Arc Carroll County does not currently meet the criteria for goals; however, we'd like to continue to be forward thinking. We continue to analyze the LEP population within the Carroll County Public School System and throughout Carroll County's total population in order to prepare for individuals, families, and staff that will need assistance.

Several individuals that attend The Arc Carroll County's services use a communication device called PODD (Program Organisation Dynamic Display). PODD is a growing communication device for individuals that are non-verbal. The Arc Carroll County hosted a PODD training for the community that was interested in learning more about this device. Other events that The Arc Carroll County hosts include Business Summit's, a Family Support Network, Cultural Day, and tours for individuals & their families that are interested in The Arc's services. We also hold tours for potential Donors and businesses that are interested in employing individuals in The Arc's Employment Services.

Individuals served at The Arc Carroll County along with their families have the opportunity to complete a survey each year where they are able to express their satisfaction with services provided, such as transportation. We also send annual satisfaction surveys to The Arc Carroll County's staff, providers, employers, & teachers that we work with. It's important to The Arc to monitor satisfaction and to gather information on what needs improvement, in order to provide the best services for the population served.

Services that we provide in the community include Day & Employment Services, Support Services, Community Living, Post-Secondary Education, Community Learning Services (CLS), and Pupil Transportation. Not only do our individuals get to experience working, learning new skills, and participating in new activities within the community, but also businesses get to learn about The Arc Carroll County, the services that we provide, and the individuals we serve through direct contact.

The Arc Carroll County's staff serves on various community civic and volunteer organizations including Rotary, Kiwanis, Local Management Board, Special Education citizens Advisory Council, Lions Club, Carroll County Disaster Preparedness Special Populations Subcommittee, and several other industry related groups. It's essential for The Arc to be involved in the community so we're able to educate citizens on our

population and the needs that our community is able to assist with to make a difference in the lives of the population we serve.

The Arc Carroll County holds several different fundraising events in order to get the word out about the services we provide for adults with intellectual and developmental disabilities. These events include the Capitol Steps, Annual Golf Tournament, and Jalopyrama.

The following publications are used by The Arc Carroll County in order to assist the elderly, people with disabilities and LEP populations: rapid alert system, email, local newspaper, WTTR radio and The Arc Carroll County's website and Facebook page.

The Arc Carroll County has a strong partnership with the Division of Rehabilitation Services (DORS) and CCPS in the event that we need assistance with implementing public engagement strategies that would affect minority and/or LEP communities.

2015-2017 Public Participation:

The Arc Carroll County hosted several events for the public including the following:

1. The grand re-opening of The Arc Carroll County's renovated building in October 2016.
2. PODD Communication Device Training on June 15, 2017 and June 16, 2017.
3. Governor Larry Hogan and his office came to The Arc on May 11, 2017 for a tour.
4. UMBC Students came to The Arc for a week in March 2015, 2016 & 2017 to volunteer in Day and Employment programs.
5. The local high school came to The Arc in December 2015 & 2016 to sing for our individuals.
6. Every winter, The Arc holds an open house for our individuals to sell their art work to the public.

Other public participation activities that The Arc did in 2015-2017 include:

1. Attending local meetings for the Rotary Club, Kiwanis, and Carroll County Public School System.
2. Holding tours of The Arc for potential donors, employers, and individuals & their families interested in receiving services. All new hires and volunteers receive a tour.
3. Holding fundraising events including the Annual Golf Tournament and Capitol Steps.

2018 - 2020 Public Participation Goals:

Goal #1: The Arc Carroll County will continue our community marketing campaign.

Implementation: The Arc Carroll County will continue to cultivate civic groups and organizations to educate people on the abilities of people with intellectual and developmental disabilities.

Goal #2: The Arc Carroll County will hold a cultural activity day.

Implementation: The Arc's cultural committee will schedule a day for staff, individuals served and families to participate in cultural activities.

Goal #3: The Arc Carroll County will continue to send satisfaction surveys to persons served, families, employers, teachers and providers.

Implementation: In January, The Arc will send satisfaction surveys to persons served, families, employers, teachers and providers in order to gather input on what's working well and what we can improve on to make sure we're providing the best services and accessibility to resources for the individuals we serve.

Goal #4: The Arc Carroll County will continue to provide tours to potential donors, employers, individuals and their families.

Implementation: When potential donors, employers, individuals and their families are interested in learning more about The Arc, we invite them to come tour our agency, hear about what services we provide, and get to know the individuals that we serve. We also like to educate them on how they can make a difference for the individuals that we serve.

APPENDIX E - TITLE VI Language Access Plan

The Arc Carroll County Language Access Plan

I. Introduction

The Arc Carroll County has prepared this Language Access Plan ("LAP" or "Plan"), which defines the actions to be taken to ensure meaningful access to agency services, programs and activities on the part of persons who have limited English proficiency. The Agency 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 clients of the Agency meaningful access to services, programs and activities although they may be limited in their English language proficiency. The Agency 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. A client maintains the right to self-identify as a LEP person.

III. Agency Description

The Arc Carroll County provides a variety of supports to people with intellectual and developmental disabilities in Carroll County. Our mission is to support people in their individual pursuit of a fulfilling life. With funding from MD-DHMH-DDA, we offer residential, day and employment and support services. With funding from CCPS, we assist individuals transitioning from school to employment, and provide transportation services to students with special needs in grades K-12.

IV. 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 Agency administrative blueprint to provide meaningful access to Agency services, programs and activities on the part of LEP individuals. This Language Access Plan outlines the tasks Agency will undertake to meet this objective.

Language Access Plan:

(1) Agency Language Access Coordinator:

Brittany Jacober, Assistant Director of Quality Assurance, 180 Kriders Church Road, Westminster, MD 21158, 410-848-4124 x114, bjacob@arccarroll.com

(2) Agency Language Access Needs Assessment:

- a. Based on the services, programs and activities listed above prioritize and describe the steps the agency will take to ensure such services, programs and activities provide

meaningful access to the populations whose language meet or exceed the 5% threshold. No population met or exceeded the 5% (or 1000 count) threshold. A Language Access Plan is not necessary at this time.

b. Language Makeup of Client Population

The Eligible Service Population (Factor 1 in the LAP) is the people with disabilities in Carroll County. The 2011-2015 American Community Survey and 2010 Census noted 159,218 residents, of which 5,364 (3.2%) were Hispanic or Latino, 10,394 (6.2%) had a disability and 2,068(1.3%) spoke English Less Than Very Well. From these, it is estimated that of the disability population, 333 are Hispanic or Latino, and 135 speak English Less Than Very Well. Specifically, The Arc Carroll County serves 2 Hispanic and 1 Asian individual of its total population of 185.

Based on this data, it was determined that the frequency with which LEP individuals would come into contact with transportation services is very low. In addition, services are person-centered, to ensure that individuals are transported to their various destinations timely, in accordance with their needs.

Resources were researched for data regarding people with disabilities in Carroll County, they include:

United States Census Bureau: <https://www.census.gov/>

c. Points of Contact between Agency and Client Population

Headquarters - 180 Kriders Church Road, Westminster, MD 21158, 410-848-4124

Company website: www.arccarroll.com

Facebook: <https://www.facebook.com/thearccarrollcounty>

Twitter: <https://twitter.com/TheArcCarroll>

(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
The Agency employs three individuals who are bilingual in Spanish and one individual who is bilingual in Russian.

- b. Community-based resources available to be deployed to assist agency in meeting language access needs. Should the need arise, The Arc Maryland offers an *Hola! Toolkit*, which describes services in Spanish.

The following are recommended by MD -DHMH, the primary funding source for The Arc Carroll County Programs: <http://dhmh.maryland.gov/oeop/Pages/Interpretation-and-Translation-Services.aspx>

- Statewide Foreign Language Interpretation/Translation Services - <http://www.dbm.maryland.gov/contractors/swcontracts/Pages/LanguageContractHome.aspx> Provides telephone and on-site translation services
- Language Line Services offers telephonic interpretation services. <http://www.languagein.com/maryland> to set up account.
 - 1 Lower Ragsdale Drive, Building 2, Monterey, CA, 93940, 1-800-752-6096, Option 4
- Schreiber Translations Inc offers written translations. <http://www.schreibernet.com/>
 - 51 Monroe St, Suite 101, Rockville, MD, 20850, 301-424-7737 (ext 125 or 127), translation@schreibernet.com
- Ad Astra Inc offers on-site interpreters: <http://ad-astrainc.com/starmd>
 - PO Box 3534, Silver Spring, MD 20918, 1-800-308-4804

(4) Language Service Protocols:

- a. Which language services are required to implement the Language Access Plan
No language services are needed at this time to implement the LAP. Should the population and needs change, the Agency will make use of the translation and interpretation services listed above to meet language access needs.

b. Define and describe Agency's language access protocols for providing interpretation services. The Agency will first determine if an involved party (staff, co-worker, family member) can explain the individual's transportation options. Ride-along and travel assistance may also be made available to ensure the individual understands his start/exit points along the route. If it is determined that the individual has Limited English Proficiency and translation or interpretation services are needed, the Agency will contact one of the services listed in (3), above.

c. Define how a client will be able to access and utilize the resources identified in paragraphs (a) and (b). Individuals can request assistance from any staff member.

(5) Vital Document Translation:

a. Agency to identify, by list, the name of vital documents, in whole or in part, to translate including timeframe for translation - N/A

b. Agency website content, by list, to translate including timeframe for translation - N/A

(6) Stakeholder Consultations:

The Arc Carroll County did not consult stakeholders in the development of this Language Access Plan.

(7) Staff Training:

Training on Title VI and LEP/LAP rights will be incorporated into New Hire Orientation and the Fundamental Rights course, which is required for all direct support staff.

(8) Notice to Public.

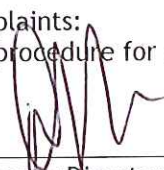
Public notice is not necessary. However, we do ensure the individuals we support understand their transportation services. Transportation is arranged for individuals on an as-needed basis. We coordinate with involved parties (transportation services, employers, staff, families and individuals) to ensure the individual understands pick up/drop times and destinations. We offer ride-along services to help the individual get accustomed to their routine. We also provide an aide on our MTA vehicles to ensure individuals board/exit the vehicle at their appropriate destinations.

(9) Agency Monitoring:

The monitoring plan will follow that of the Title VI plan.

(10) Complaints:

The procedure for addressing complaints is incorporated in the Title VI Complaint Procedure.



Signature of Agency Director



DATE

You may file a complaint with the Agency Title VI Manager if you believe you have been denied the benefits of this Plan. You must file your written complaint within 30 days of the alleged denial. Submit the written complaint to:

Brittany Jacober, Assistant Director of Quality Assurance
The Arc Carroll County
180 Kriders Church Road
Westminster, MD 21158
bjacob@arccarroll.com

APPENDIX F - TITLE VI TABLE OF MINORITY REPRESENTATION ON COMMITTEES

The Arc Carroll County has no transit-related, planning boards, advisory councils or committees, or similar committees, whether the membership is selected or elected. Should a non-elected committee be established, its representation by race would be monitored.

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
N/A								
% of Committee								

**Note - Other races reported:*



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APPENDIX G – BOARD MEETING MINUTES

The Arc Carroll County
Board of Director's Meeting
January 8, 2018

ATTENDANCE:

Board Members: Sherri-Le Bream, President; Lou Salafia, Vice President; Erica Wheeler, Secretary; Rob Burk, Treasurer; Lisa Breslin, Corynne Courpas, Lynn Davis, Charlie Fisher, Todd Frager

Staff Members: Don Rowe, Mary Jo Walla, Kim Booe, Kathy Forbes, Mandy Baker, Krissy Heuer, Shelba Uhrin

CALL TO ORDER: Sherri-Le Bream, President, called the meeting to order at 7:38 a.m.

MINUTES and FINANCIAL STATEMENTS:

- **Consent Resolution to approve** the minutes of the November 2017 Board Meeting and October and November 2017 financial statements.
- Lou Salafia had a change to the November minutes under Report from Governance Committee: Instead of saying proposed it should say confirmed five (2 year) terms for board officers.
Motion made to approve. Breslin/Wheeler Motion accepted. Board approved.

NEW BUSINESS:

- **Leadership Challenge presentation**
 - Don Rowe, Mary Jo Walla, Kathy Forbes, Shelba Uhrin and Krissy Heuer gave an overview on the five day leadership training course they attended in November. The training was hosted by DDA, focusing on person centered services. The next step will be to present

the training to a pilot group made up of 18 Arc employees to get feedback on how the training should be rolled out to staff.

- **Report from Community Living committee**
 - Don gave an update on the rate study. We are still waiting to get the final report. As it currently stands we are positioned well. The most significant hourly rate cut will be in support services.
 - Discussed the idea of needing affordable safe housing if we transition our clients out of our residential housing. Don Rowe, Mary Jo Walla and Krissy Heuer are scheduled to meet with Citizen Services in February.
- **Bus Bids**
 - To fulfill The Arc's contractual obligation to Carroll County Public School system to provide special needs transportation, four buses need to be purchased by the end of December 2018. Don Rowe gave an overview of the bids and the companies providing the bids. Board recommends purchasing the buses from American Bus. **Motion made to accept recommendation: Salafia/Courpas. Motion accepted. Board approved.**
- **Review of The Arc's Title VI Plan**
 - Reviewed the revisions to The Arc's Title VI Plan. The changes were reviewed by the board and adopted by the Board of Directors at this meeting. Motion made to approve: **Breslin/Salafia**. Motion accepted. Board approved.

REPORTS:

- The rate study has been released and several questions/concerns have emerged from the provider community. Jenny and Don Rowe have a conference call with JGVA, the company who completed the study. The call is scheduled for 10am on January 8th. The study indicated that \$38 million additional revenue is necessary to fully fund the study outcomes.
- The holiday parties were well attended and the Secret Santa project was successful. Over 160 individuals were "adopted" by Secret Santas.
- Don Rowe is drafting a part-time job description for the director of development. Will share with the development committee and then advertise.
- The annual appeal has netted \$39,436 to date. This is one of our most successful years.
- Don Rowe is working with Mary Jo and Brittany to submit an application to provide additional services under the Family Supports Waiver. This is a new waiver that will fund families and children services. In addition, transitioning youth services will be funded under this waiver beginning in 2019.

- The Portico has informed us that they will no longer rent their facility to community organizations for events. This impacts The Annual Dinner and future Christmas parties.

.ANNOUNCEMENTS:

- DD Day in Annapolis – February 22, 2018
- Annual Dinner – May 8, 2018

ADJOURNMENT: Motion made to adjourn. **Breslin/Courpas** The meeting was adjourned at 8:50 a.m.

Respectfully submitted by,

Erica Wheeler
Secretary