



Title VI Plan and Procedures

Title VI of the Civil Rights Act of 1964

Henry County Parks and Recreation Senior Services

06/01/2023

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INTRODUCTION

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

The Civil Rights Restoration Act of 1987 clarified the intent of Title VI to include all programs and activities of Federal-aid recipients, sub-recipients, and contractors whether those programs and activities are federally funded or not.

Recently, the Federal Transit Administration (FTA) has placed renewed emphasis on Title VI issues, including providing meaningful access to individuals with Limited English Proficiency.

Recipients of public transportation funding from FTA and the Virginia Department of Rail and Public Transportation (DRPT) are required to develop policies, programs, and practices that ensure that federal and state transit dollars are used in a manner that is nondiscriminatory as required under Title VI.

This document details how Henry County Parks and Recreation Senior Services incorporates nondiscrimination policies and practices in providing services to the public. Henry County Parks and Recreation Senior Services' Title VI policies and procedures are documented in this plan and its appendices and attachments. This plan will be updated periodically (at least every three years) to incorporate changes and additional responsibilities that arise.

I. POLICY STATEMENT AND AUTHORITIES

Title VI Policy Statement

Henry County Parks and Recreation Senior Services, formed in 1978, operates under the Henry County Parks and Recreation. The Henry County Parks and Recreation is the county's non-profit government organization that operates on the purpose to provide leisure, entertainment, and recreation. Henry County Parks and Recreation directed by Roger Adams operates under the support of the Henry County Board of Supervisors. Henry County Senior Services is a subcontractor of Southern Area Agency on Aging. Henry County Parks and Recreation Senior Services provide and assist in medical and nutritional transportation needs of individuals 60 and older, who reside in Henry County at no cost.

Transportation are provided for the following: congregate meals, medical appointments, (including doctor's appointments, therapy, specific treatments, and dialysis), grocery shopping and other essential needs (including pharmacy, banks, post office, social services, and social security).

Henry County Parks and Recreation Senior Services provides recreational activities throughout the year for individuals 50 and older. Recreational activities include nutritional programs, physical activities, hand eye coordination activities, and emotional support. Majority of the programs offered are free of charge to all participants.

III. POLICY STATEMENT AND AUTHORITIES

Henry County Parks and Recreation Senior Services 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 Henry County Parks and Recreation Senior Services 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

July 1, 2023

Date

Authorities

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

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

IV. ORGANIZATION AND TITLE VI PROGRAM RESPONSIBILITIES

The Henry County Parks and Recreation Senior Services, Senior Coordinator, Ashley Nicole Mundy is responsible for ensuring implementation of the agency's Title VI program. Title VI program elements are interrelated and responsibilities may overlap. The specific areas of responsibility have been delineated below for purposes of clarity.

Overall Organization for Title VI

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

Detailed Responsibilities of the Title VI Manager

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

1. Process the disposition of Title VI complaints received.
2. Collect statistical data (race, color or national origin) of participants in the beneficiaries of agency programs, (e.g., affected Henry County residents and or impacted Henry County communities)
3. Conduct annual title VI reviews of agency to determine the effectiveness of program activities at all levels.
4. Conduct training programs on Title VI and other related statutes for Senior Services Transportation.
5. Prepare a yearly report of Title VI accomplishments and goals, as required.
6. Develop Title VI information for dissemination to the public and, where appropriate, in languages other than English.
7. Identify and eliminate discrimination.
8. 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 Henry County Parks and Recreation Senior Services

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, Henry County Parks and Recreation Senior Services 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, Henry County Parks and Recreation Senior Services is required to submit a Quarterly Report Form to DRPT that documents any Title VI complaints received during the preceding quarter and for each year. Henry County Parks and Recreation Senior Services will also maintain and provide to DRPT on an annual basis, the log of public outreach and involvement activities undertaken to ensure that minority and low-income people had a meaningful access to these activities.

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

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

3. Annual review of Title VI program

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

4. Dissemination of information related to the Title VI program

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

5. Resolution of complaints

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

6. Written policies and procedures

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

7. Internal education

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

Title VI training is the responsibility of the Henry County Senior Services, Senior Coordinator

8. Title VI clauses in contracts

In all federal procurements requiring a written contract or Purchase Order (PO), Henry County Parks and Recreation Senior Services contract/PO will include appropriate non-discrimination clauses. The Title VI Manager will work with the Henry County Parks and Recreation Director who is responsible for procurement contracts and PO's to ensure appropriate non-discrimination clauses are included.

V. Nondiscrimination Assurances to DRPT

Annual Nondiscrimination Assurance to the Virginia Department of Rail and Public Transportation (DRPT)

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

As part of the Certifications and Assurances submitted to the DRPT with the Annual Grant Application and all Federal Transit Administration grants submitted to the VDRPT, Henry County Parks and Recreation Senior Services submits a Nondiscrimination Assurance which addresses compliance with Title VI as well as nondiscrimination in hiring (EEO) and contracting (DBE), and nondiscrimination on the basis of disability (ADA).

In signing and submitting this assurance, Henry County Parks and Recreation Senior Services confirms to VDRPT the agency's commitment to nondiscrimination and compliance with federal and state requirements.

VI. Plan Approval Document

The Advisory Board for Henry County Parks and Recreation will review for approval Henry County Senior Services 2023-2026 Title VI Plan and Procedures (as updated) when monthly meeting occurs on June 6, 2023. A statement to reflect their review and approval, i.e., excerpt from the approved document for Title IV of June 6, 2023, Advisory Board Meeting, will be provided.

I hereby acknowledge the receipt of the Henry County Parks and Recreation Senior Services Title VI Implementation Plan 2023-2026. I have reviewed and approve the plan. I am committed to ensuring that no person is excluded from participation in, or denied the benefits of transit services on the basis of race, color, or national origin, as protected by Title VI according to Federal Transit Administration (FTA) Circular 4702.iB Title VI requirements and guidelines for FTA sub-recipients.

Roger Adams

Roger G. Adams, CPRP

Henry County Parks and Recreation Director

July 1, 2023

Date

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

Requirement to Provide a Title VI Public Notice

Title 49 CFR Section 21.9(d) requires recipients to provide information to the public regarding the recipient's obligations under DOT's Title VI regulations and apprise members of the public of the protections against discrimination afforded to them by Title VI. At a minimum, Henry County Parks and Recreation Senior Services shall disseminate this information to the public by posting a Title VI notice on the agency's website and in public areas of the agency's office(s), including the reception desk, meeting rooms, in federally-funded vehicles, etc. (including Spanish Translation. See APPENDIX A- Title VI Notice to the Public; APPENDIX B – Title VI Notice to the Public List of Locations; and APPENDIX G – Title VI Notice to the Public, Spanish Translation.

Title VI Complaint Procedures

Requirement to Develop Title VI Complaint Procedures and Complaint Form.

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

Any individual may exercise his or her right to file a complaint with Henry County Parks and Recreation Senior Services if that person believes that he or she has been subjected to unequal treatment or discrimination in the receipt of benefits or services. We will report the complaint to DRPT within three business days (per DRPT requirements), and make a concerted effort to resolve complaints locally, using Henry County Senior Services Nondiscrimination Complaint Procedures. All Title VI complaints and their resolution will be logged and reported annually (in addition to immediately) to DRPT.

Henry County Parks and Recreation Senior Services 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:

Henry County Parks and Recreation Senior Services is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transportation services on the basis of race, color or national origin, as protected by Title VI of the Civil Rights Act of 1964.

For additional information on Henry County Parks and Recreation Senior Services nondiscrimination policies and procedures, or to file a complaint, please visit the

website at www.henrycountyva.gov or Henry County Senior Services Senior Coordinator, 3300 Kings Mountain Road, Martinsville, VA. 24112.

Instructions for filing Title VI complaints are posted on Henry County website and in posters on the interior of each vehicle operated in passenger service and Parks and Recreation facilities, and are included within Henry County Parks and Recreation Senior Services Transportation brochure. SEE APPENDIX C-Title VI Complaint Form

Procedures for Handling and Reporting Investigations/Complaints and Lawsuits

Should any Title VI investigations be initiated by FTA or DRPT, or any Title VI lawsuits are filed against Southern Area Agency on Aging, the Agency will follow these procedures:

Procedures

1. Any individual, group of individuals, or entity that believes they have been subjected to discrimination on the basis of race, color, or national origin may file a written complaint with the Title VI Manager. The complaint is to be filed in the following manner:
 - a. A formal complaint must be filed within 180 calendar days of the alleged occurrence.
 - b. The complaint shall be in writing and signed by the complainant(s). Henry County Parks and Recreation Senior Services will provide complaint forms in English and, if needed, in formats accessible to individuals with disabilities and appropriate languages for LEP persons.
 - c. The complaint should include:
 - The name of the agency the complaint has been filed against (Henry County Parks and Recreation Senior Services)
 - The complainant's name, address, and contact information
 - (i.e., telephone number, email address, etc.)
 - The date(s) of the alleged act of discrimination (if multiple days, include the date when the complainant(s) became aware of the alleged discrimination and the date on which the alleged discrimination was discontinued or the latest instance).
 - A description of the alleged act of discrimination
 - The location(s) of the alleged act of discrimination (include vehicle number if appropriate)
 - An explanation of why the complainant believes the act to have been discriminatory on the basis of race, color, and national origin
 - If known, the names and/or job titles of those individuals perceived as parties in the incident
 - Contact information for any witnesses

- Indication of any related complaint activity (i.e., was the complaint also submitted to DRPT or FTA?)
- d. The complaint shall be submitted to the Henry County Parks and Recreation Senior Services Title VI Manager at 3300 Kings Mountain Road, Martinsville, VA 24112 or by email at amundy@co.henry.va.us.
 - e. Complaints received by any other employee of Henry County Parks and Recreation will be immediately forwarded to the Title VI Manager.
 - f. In the case where a complainant is unable or incapable of providing a written statement, a verbal complaint of discrimination may be made to the Title VI Manager. Under these circumstances, the complainant will be interviewed (with an interpreter, if needed/available) and the Title VI Manager (or other Henry County Parks and Recreation staff members with Title VI responsibilities) will assist the complainant in converting the verbal allegations to writing.
2. Upon receipt of the complaint, the Title VI Manager will immediately:
 - a. notify DRPT (no later than 3 business days from receipt)
 - b. notify the Henry County Parks and Recreation Director
 - c. ensure that the complaint is entered in the complaint database
 3. Within 3 business days of receipt of the complaint, the Title VI Manager will contact the complainant by telephone to set up an interview.
 4. The complainant will be informed that they have a right to have a witness or representative present during the interview and can submit any documentation he/she perceives as relevant to proving his/her complaint.
 5. If DRPT has assigned staff to assist with the investigation, the Title VI Manager will offer an opportunity to participate in the interview.
 6. The alleged discriminatory service or program official will be given the opportunity to respond to all aspects of the complainant's allegations.
 7. The Title VI Manager will determine, based on relevancy or duplication of evidence, which witnesses will be contacted and questioned.
 8. The investigation may also include:
 - a. investigating contractor operating records, policies or procedures
 - b. reviewing routes, schedules, and fare policies
 - c. reviewing operating policies and procedures
 - d. reviewing scheduling and dispatch records
 - e. observing behavior of the individual whose actions were cited in the complaint
 9. All steps taken and findings in the investigation will be documented in writing and included in the complaint file.
 10. The Title VI Manager will contact the complainant at the conclusion of the investigation, but prior to writing the final report, and give the complainant an opportunity to give a rebuttal statement at the end of the investigation process.
 11. At the conclusion of the investigation and within 60 days of the interview with the complainant, the Title VI Manager will prepare a report that includes a narrative description of the incident, identification of persons interviewed, findings, and recommendations for

disposition. This report will be provided to the Henry County Parks and Recreation Director, DRPT, and, if appropriate, Henry County attorney.

12. The Title VI Manager will send a letter to the complainant notifying them of the outcome of the investigation. If the complaint was substantiated, the letter will indicate the course of action that will be followed to correct the situation. If the complaint is determined to be unfounded, the letter will explain the reasoning, and refer the complainant to DRPT in the event the complainant wishes to appeal the determination. This letter will be copied to DRPT.
13. A complaint may be dismissed for the following reasons:
 - a. The complainant requests the withdrawal of the complaint.
 - b. An interview cannot be scheduled with the complainant after reasonable attempts.
 - c. The complainant fails to respond to repeated requests for additional information needed to process the complaint.
14. DRPT will serve as the appealing forum to a complainant that is not satisfied with the outcome of an investigation conducted by Henry County Parks and Recreation Senior Services. DRPT will analyze the facts of the case and will issue its conclusion to the appellant according to their procedures.

A person may also file a complaint directly with the Federal Transit Administration, Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor – TCR, 1200 New Jersey Avenue SE, Washington, DC 20590.

Transportation-Related Title VI Investigations, Complaints, and Lawsuits

Background

All recipients shall prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, or national origin:

- Active investigations conducted by FTA and entities other than FTA;
- Lawsuits; and
- Complaints naming the recipient.

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

VII. Monitoring Title VI Complaints

As part of the complaint handling procedure, the Title VI Manager investigates possible inequities in service delivery for the route(s) or service(s) about which the complaint was filed. Depending on the nature of the complaint, the review examines span of service (days and hours), frequency, routing directness, interconnectivity with other routes and/or fare policy. If inequities are discovered during this review, options for reducing the disparity are explored, and service or fare changes are planned if needed.

In addition to the investigation following an individual complaint, the Title VI Manager periodically reviews all complaints received to determine if there may be a pattern. At a minimum, this review is conducted as part of preparing the Annual Report and Update for submission to DRPT.

VIII. PUBLIC PARTICIPATION PLAN

Introduction

The Public Participation Plan (PPP) is a guide for ongoing public participation endeavors. Its purpose is to ensure that Henry County Parks and Recreation Senior Services 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, transportation operators must take reasonable steps to ensure that Limited English Proficient (LEP) persons have meaningful access to their programs and activities. This means that public participation opportunities, normally provided in English, should be accessible to persons who have a limited ability to speak, read, write, or understand English.

In addition to language access measures, other major components of the PPP include: public participation design factors; a range of public participation methods to provide information, to invite participation and/or to seek input; examples to demonstrate how population-appropriate outreach methods can be and were identified and utilized; and performance measures and objectives to ensure accountability and a means for improving over time.

Henry County Parks and Recreation Senior Services and with the guidance of Southern Area Agency on Aging will make these determinations based on a demographic analysis of the population(s) affected, the type of plan, program, and/or service under consideration, and the resources available. Efforts to involve minority and LEP populations in public participation activities may include both comprehensive measures, such as placing public notices in vehicles, as well as targeted measures to address linguistic, institutional, cultural, economic, historical, or other barriers that may prevent minority and LEP persons from effectively participating in our decision-making process. Henry County Parks and Recreation Senior Services has daily public outreach programs that target all individuals ages 60 and older. These programs allow the Senior Services staff to recognize how and where to focus on LEP individuals (i.e., non-public transportation services). See APPENDIX E – Summary of Outreach Efforts.

IX. LANGUAGE ASSISTANCE PLAN FOR PERSONS WITH LIMITED ENGLISH PROFICIENCY (LEP)

Introduction and Legal Basis

LEP is a term that defines any individual not proficient in the use of the English language. The establishment and operation of an LEP program meets objectives set forth in Title VI of the Civil Rights Act and Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency (LEP). This Executive Order requires federal agencies receiving financial assistance to address the needs of non-English speaking persons. The Executive Order also establishes compliance standards to ensure that the programs and activities that are provided by a transportation provider in English are accessible to LEP communities. This includes providing meaningful access to individuals who are limited in their use of English. The following LEP language implementation plan, developed by Henry County Parks and Recreation Senior Services is based on FTA guidelines.

Henry County Parks and Recreation Senior Services is a sub-contractor of Southern Area Agency on Aging. As required, Henry County Parks and Recreation Senior Services developed a written LEP Plan using American Community Survey (ACS) Census data, Henry County Parks and Recreation Senior Services processed the 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

Henry County Senior Services has reviewed census data on the number of individuals in its service area that have limited English Proficiency, as well as the languages they speak.

U.S. Census Data – American Community Survey (2019-2021)

Data from the U.S. Census Bureau’s American Community Survey (ACS) were obtained through www.census.gov by Henry County Parks and Recreation Senior Services for the servicing area of Henry County, VA. The Henry County Senior Services service area includes a total of 55,000 total population with 1,389 (1.0%) of the total population reported as persons with Limited English Proficiency (those persons who indicated that they spoke English “less than very well,” in the 2019-2021 ACS Census).

Information from the 2019-2021 ACS also provides more detail on the specific languages that are spoken by those who report that they speak English less than very well. Languages spoken at home by those with LEP are presented below. These data indicate the extent to which translations into other language are needed to meet the needs of LEP persons.

- | | | |
|----------------------------|-------|-------|
| • Spanish | 1,389 | 1.0% |
| • Other Languages combined | | (-1%) |

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

Henry County Parks and Recreation Senior Services reviewed the past documentation from 2019-2022 that is completed monthly and reported to DRPT and OLGA, showing that less than one percent of individuals that use Henry County Parks and Recreation Senior Services Transportation requires LEP.

Although we have determined that no direct contact with LEP persons requesting assistance have been received by Henry County Parks and Recreation Senior Services, we will continue to identify emerging populations as updated Census and American Community Survey data become available for Henry County, VA. In addition, when LEP persons contact our department, we attempt to identify their language and keep records on contacts to accurately assess the frequency of contact. To assist in language identification, Henry County Senior Services uses a language identification through Google Translate (<https://translate.google.com>)

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

Henry County Parks and Recreation Senior Services provides the following programs, activities and services:

Demand response transportation to senior nutrition sites, dialysis and therapy treatments, other medical appointments, necessary stops to grocery stores, banks, social services, and social security

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

Costs

Language assistance measures are currently not being provided by Henry County Parks and Recreation Senior Services. Based on the analysis of the U.S Census Bureau's American Community Survey data, contact with community organizations, and LEP persons, Henry County Senior Services has determined that, at this time, minimal services are needed to provide meaningful access: We anticipate that these activities and costs will increase as demand increases and that the need for the following will increase:

- No cost estimates are currently available.

Resources

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

X. Implementing LEP Plan

Henry County Parks and Recreation Senior Services have determined to make the LEP plan successful the following will need to be implemented and/or improved

Responding to LEP Callers

Staff who answer calls from the public respond to LEP customers as follows: Staff would transfer a call to bilingual staff (if available), connect call to Google Translate to be able to communicate more efficiently

Responding to Written Communications from LEP Persons

The following procedure is implemented when responding to written communications from LEP persons: Henry County Parks and Recreation does not have a fluent bilingual staff that can interpret efficiently. Google Translate allows staff members to type the written communication

Responding to LEP Individuals in Person

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

To date, on those rare occasions when LEP persons have visited our office, they have been accompanied by a bilingual family member or friend who serves as translator for the LEP person as well as the staff for Henry County Parks and Recreation Senior Services conducting the interview. If an LEP person is not accompanied by a bilingual person, Henry County Senior Services staff will use of language translation services if appropriate and available. (i.e. Google Translate)

The following procedures are followed by transportation operators when an LEP person has a question on board a Henry County Parks and Recreation Senior Services operated vehicle:

To date, on those rare occasions when LEP persons have utilized Henry County Parks and Recreation Senior Services Transportation, they have been accompanied by a bilingual family member or friend who serves for the LEP person as well as the transportation operator. If a bilingual family member or friend does not accompany the LEP person, the transportation operators will use Google Translate

Staff Training

As noted previously, all Henry County Parks and Recreation Transportation staff are provided with training on how to use Google Translate if needed during transportation.

Providing Notice to LEP Persons

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

- Through signs which will be posted in our customer service and administrative offices.
- Through signs which are posted in the Henry County Parks and Recreation vans used for medical transportation
- Through ongoing outreach efforts to community organizations hosted by the Henry County Parks and Recreation, and religious organizations.

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

Monitoring/updating the plan

This plan will be updated on a periodic basis (at least every three years), based on feedback from programs hosted by Henry County Parks and Recreation surveys, updated demographic data, and resource availability.

In preparing for updating this plan, Henry County Parks and Recreation Senior Services use the Language Assistance Monitoring Checklist provided in the FTA's "Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons: A Handbook for Public Transportation Providers."

As the community grows and new LEP groups emerge, Henry County Parks and Recreation Senior Services will work to address the needs for additional language assistance.

MINORITY REPRESENTATION ON 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."

Henry County Parks and Recreation currently has an Advisory Council, which meet once a month. Each member of the Henry County Parks and Recreation Advisory Board are appointed by the jurisdictions served by Henry County Parks and Recreation. Each member currently serving on the Henry County Advisory Board are volunteer based.

APPENDIX A: Title VI Notice to the Public

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

Henry County Parks and Recreation Senior Services is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transportation services based on race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702. 1B. If you feel, you are being denied participation in or being denied benefits of the transportation services provided or funded by Henry County Parks and Recreation Senior Services, or otherwise being discriminated against because of your race, color, national origin, gender, age, or disability, our contact information is:

Ashley N. Mundy

Henry County Parks and Recreation Senior Services Coordinator

3300 Kings Mountain Road, Martinsville, VA 24112

Phone: 276.634.4644

Fax: 276.634.4637

E-Mail: amundy@co.henry.va.us

APPENDIX B: Title Vi Notice to the Public (Spanish Translation)

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

Henry County Parks and Recreation Senior Services (Servicios para Personas Mayores de Parques y Recreación del Condado de Henry) se compromete a garantizar que: ninguna persona sea excluida de la participación, o le sean negados los beneficios de sus servicios de transporte, sin importar raza, color o nacionalidad de origen, protegido por el título VI de la Administración de Tránsito Federal (FTA) circular 4702. 1B. Si usted siente que, se le ha sido negada la participación o beneficios de los servicios de transporte, proporcionados o financiados por Southern Area Agency on Aging, o de alguna manera haya sido discriminado debido a su raza, color, país de origen, sexo, género, edad, o discapacidad, por favor contáctenos. Nuestra información de contacto es:

Ashley N. Mundy

Henry County Parks and Recreation Senior Services Coordinator

3300 Kings Mountain Road, Martinsville, VA 24112

Phone: 276.634.4644

Fax: 276.634.4637

E-Mail: amundy@co.henry.va.us

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

The following list represents the locations Henry County Parks and Recreation Senior Services has posted its Title VI Notice to the Public:

- Website of Henry County, VA, under Parks and Recreation section -
www.henrycountyva.org
- Reception Area of the Henry County Parks and Recreation Senior Services
3300 Kings Mountain Road, Martinsville, VA 24112
- Vehicles owned, operated and/or titled to Henry County Parks and Recreation Senior Services

Title IV Complaint Form
Henry County Parks and Recreation Senior Services

Section I:			
Name:			
Address:			
Telephone (Home):		Telephone (Work):	
Electronic Mail Address:			
Accessible Format Requirements?	Large Print		Audio Tape
	TDD		Other
Section II:			
Are you filing this complaint on your own behalf?		Yes*	No
*If you answered "yes" to this question, go to Section III.			
If not, please supply the name and relationship of the person for whom you are complaining:			
Please explain why you have filed for a third party:			
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.		Yes	No
Section III:			
I believe the discrimination I experienced was based on (check all that apply):			
<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.			
Section IV			
Have you previously filed a Title VI complaint with this agency?		Yes	No
Section V			
Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?			

<input type="checkbox"/> Yes	<input type="checkbox"/> 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 information about a contact person at the agency/court where the complaint was filed.	
Name:	
Title:	
Agency:	
Address:	
Telephone:	
Section VI	
Name of agency complaint is against:	
Contact person:	
Title:	
Telephone number:	

You may attach any written materials or other information that you think is relevant to your complaint.

Signature and date required below

Signature

Date

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

Henry County Parks and Recreation Senior Services
 Title XI Compliance Manager
 3300 Kings Mountain Road
 Martinsville, VA 24112

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

Investigations, Lawsuits and Complaints

	DATE Month, Day, Year	Summary (include basis of complaint: race, color or national origin)	Status	Action Taken
Investigations:				
1.				
Lawsuits:				
1.				
Complaints:				
1.				

Appendix F: OUTREACH EFFORTS

Henry County Parks and Recreation Senior Services is active within the community on a daily bases with activities offered. The following details how Henry County Parks and Recreation Senior Services accomplish outreach efforts to the LEP minority groups.

1. During every recreational activity, Henry County Senior Services discusses and offers every individual a survey on what opinion each person feels we can do better on making the program more successful
2. Rely on social media and word of mouth marketing to individuals within Henry County
3. Send information to religious groups within Henry County in hopes that word of mouth marketing will help increase Henry County Parks and Recreations Senior Services programs to the LEP persons