



# **Title VI Plan and Procedures**

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

**2022-2024**

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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 the Federal Transit Administration (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 Grafton Integrated Health Network (Grafton) incorporates nondiscrimination policies and practices in providing services to the public. Grafton's Title VI policies and procedures are documented in this plan and its appendices and attachments. This plan will be updated periodically (at least every three years) to incorporate changes and additional responsibilities that arise.

## **II. OVERVIEW OF SERVICES**


Grafton Integrated Health Network is a private behavioral healthcare organization with offices in Virginia, providing services throughout the United States. Grafton supports individuals with intellectual, developmental and psychiatric disabilities through a broad continuum of services including in-home Applied Behavior Analysis services, community-based group homes, private day schools, and a psychiatric residential treatment center. Grafton provides transportation for certain services in Virginia.

### III. POLICY STATEMENT AND AUTHORITIES

#### Title VI Policy Statement

Grafton 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.

Grafton'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.

  
\_\_\_\_\_  
Vanessa Lane, CAO/Title VI Manager

11/22/2021  
Date

## **Authorities**

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

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

## **IV. NONDISCRIMINATION ASSURANCES TO DRPT**

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

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

**V. PLAN APPROVAL DOCUMENT**

I hereby acknowledge the receipt of the Grafton Integrated Health Network Title VI Implementation Plan 2022-2024. I have reviewed and approve the Plan. I am committed to ensuring that no person is excluded from participation in, or denied the benefits of transit services on the basis of race, color, or national origin, as protected by Title VI according to Federal Transit Administration (FTA) Circular 4702.1B Title VI requirements and guidelines for FTA sub-recipients.

  
\_\_\_\_\_  
Jerry Partlow, Chair, Board of Directors  
Grafton Integrated Health Network

11/22/2021  
Date

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

Grafton's Chief Administrative Officer 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 is responsible for coordinating the overall administration of the Title VI program, plan, and assurances, including complaint handling, data collection and reporting, annual review and updates, and internal education.

The director of communications is responsible for public outreach and involvement. This includes development and implementation of the Limited English Proficiency (LEP) plan. Those responsible for this area also coordinate with those who are responsible for service planning and delivery.

### **Detailed Responsibilities of the Title VI Manager**

The Title VI Manager is responsible for supervising the other staff assigned with Title VI responsibilities in implementing, monitoring, and reporting on Grafton's compliance with Title VI regulations. In support of this, the Title VI Manager will:

1. Process the disposition of Title VI complaints received.
2. Collect statistical data (race, color or national origin) of participants in and beneficiaries of agency programs (e.g., affected citizens, and impacted communities).
3. Conduct annual Title VI reviews of agency to determine the effectiveness of program activities at all levels.
4. Conduct Title VI reviews of construction contractors, consultant contractors, suppliers, and other recipients of federal-aid fund contracts administered through the agency.
5. Conduct training programs on Title VI and other related statutes for agency employees.
6. Prepare a yearly report of Title VI accomplishments and goals, as required.
7. Develop Title VI information for dissemination to the general public and, where appropriate, in languages other than English.
8. Identify and eliminate discrimination.
9. Establish procedures for promptly resolving deficiency status and writing the remedial action necessary, all within a period not to exceed 90 days.

## **General Title VI Responsibilities of the Agency**

The Title VI Manager is responsible for substantiating that these elements of the plan are appropriately implemented and maintained, and for coordinating with those responsible for public outreach and involvement and service planning and delivery.

### **1. Data Collection**

To ensure that Title VI reporting requirements are met, Grafton 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 meaningful access to these activities.

### **2. Annual Report and Updates**

As a sub-recipient of FTA funds, Grafton 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. Grafton 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 meaningful access to these activities.

Further, Grafton 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 notice to the public that it complies with Title VI and instructions on how to file a discrimination complaint.

### **3. Annual Review of Title VI Program**

Each year, in preparing for the Annual Report and Updates, the Title VI Manager will review the agency's Title VI program to assure implementation of the Title VI plan. In addition, Grafton 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 Grafton's 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. Grafton will report the complaint to DRPT within three business days (per DRPT requirements) and make a concerted effort to resolve complaints locally, using Grafton's Title VI complaint procedures. All Title VI complaints and their resolution will be logged as described in this document and reported annually (in addition to immediately) to DRPT.

#### **6. Written Policies and Procedures**

Grafton's 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, the Title VI Manager will determine whether or not an update is needed.

#### **7. Internal Education**

Grafton employees will receive training on Title VI policies and procedures upon hiring and upon promotion to a supervisory position. 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 employee training is the responsibility of the Training and Performance Architect.**

#### **8. Title VI Clauses in Contracts**

In all federal procurements requiring a written contract or purchase order (PO), Grafton's contract/PO will include appropriate non-discrimination clauses. The Title VI Manager will work with the Chief Financial Officer who is responsible for procurement contracts and PO's to ensure appropriate non-discrimination clauses are included.

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

### **Requirement to Provide a Title VI Public Notice**

Title 49 CFR Section 21.9(d) requires Grafton to provide information to the public regarding Grafton'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 minimum, Grafton shall disseminate this information to the public by posting a Title VI notice on the agency's website. Of note, Grafton only provides transportation services to individuals admitted into specific Grafton programs. All clients in those designated programs have equal access to transportation, without discrimination.

Public notice is provided as part of the Parent/Client Handbook.

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

**SEE APPENDIX A-Title VI Notice to the Public**

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

### **TITLE VI 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), Grafton 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, ie Grafton, must also develop a Title VI complaint form. The form and procedure for filing a complaint shall be available on the recipient's (Grafton's) website and at their facilities.

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

Grafton includes the following language on relevant printed information materials and on the agency's website, thus assuring all individuals involved, or potentially involved, in a Grafton program that includes transportation, have easy access to this information:

***Grafton is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit 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 Grafton's nondiscrimination policies and procedures, or to file a complaint, please visit the website at [contawww.grafton.org](http://contawww.grafton.org) or contact Vanessa Lane, Chief Administrative Officer (serves as Title VI Manager), PO Box 2500, Winchester, VA 22604.***

Instructions for filing Title VI complaints are posted on the agency's website and in posters on the interior of each vehicle operated in passenger service and agency's facilities, and are also included within Grafton's employee training material.

*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)*

**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 Grafton, 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 Grafton's 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). The complaint does not have to be received on a specific form in order to be processed.

- c. The complaint should include:
  - the complainant's name, address, and contact information (i.e., telephone number, email address, etc.)
  - the date(s) of the alleged act of discrimination (if multiple days, include the date when the complainant(s) became aware of the alleged discrimination and the date on which the alleged discrimination was discontinued or the latest instance).
  - a description of the alleged act of discrimination
  - the location(s) of the alleged act of discrimination (include vehicle number if appropriate)
  - an explanation of why the complainant believes the act to have been discriminatory on the basis of race, color, and national origin
  - if known, the names and/or job titles of those individuals perceived as parties in the incident
  - contact information for any witnesses
  - indication of any related complaint activity (i.e., was the complaint also submitted to DRPT or FTA?)
- d. The complaint shall be submitted to the Grafton Title VI Manager at PO Box 2500, Winchester, VA 22604 or at [vanessa.r.lane@grafton.org](mailto:vanessa.r.lane@grafton.org).
- e. Complaints received by any other employee of Grafton will be immediately forwarded to the Title VI Manager.
- f. In the case where a complainant is unable or incapable of providing a written statement, a verbal complaint of discrimination may be made to the Title VI Manager. Under these circumstances, the complainant will be interviewed, and Grafton will provide assistance to 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 Grafton's Authorizing Official
  - c. ensure that the complaint is entered in the complaint database
- 3. Within 3 business days of receipt of the complaint, the Title VI Manager will contact the complainant by telephone to set up an interview.
- 4. The complainant will be informed that they have a right to have a witness or representative present during the interview and can submit any documentation he/she perceives as relevant to proving his/her complaint.
- 5. If DRPT has assigned staff to assist with the investigation, the Title VI Manager will offer an opportunity to participate in the interview.
- 6. The alleged discriminatory service or program official will be given the opportunity to respond to all aspects of the complainant's allegations.
- 7. The Title VI Manager will determine, based on relevancy or duplication of evidence, which witnesses will be contacted and questioned.
- 8. The investigation may also include:
  - a. investigating contractor operating records, policies or procedures
  - b. reviewing routes, schedules, and fare policies
  - c. reviewing operating policies and procedures
  - d. reviewing scheduling and dispatch records

- e. observing behavior of the individual whose actions were cited in the complaint
9. All steps taken and findings in the investigation will be documented in writing and included in the complaint file.
10. The Title VI Manager will contact the complainant at the conclusion of the investigation, but prior to writing the final report, and give the complainant an opportunity to give a rebuttal statement at the end of the investigation process.
11. At the conclusion of the investigation and within 60 days of the interview with the complainant, the Title VI Manager will prepare a report that includes a narrative description of the incident, identification of persons interviewed, findings, and recommendations for disposition. This report will be provided to the Authorizing Official, the DRPT, and, if appropriate, Grafton's legal counsel.
12. The Title VI Manager will send a letter to the complainant notifying them of the outcome of the investigation. If the complaint was substantiated, the letter will indicate the course of action that will be followed to correct the situation. If the complaint is determined to be unfounded, the letter will explain the reasoning, and refer the complainant to DRPT in the event the complainant wishes to appeal the determination. This letter will be copied to DRPT.
13. A complaint may be dismissed for the following reasons:
  - a. The complainant requests the withdrawal of the complaint.
  - b. An interview cannot be scheduled with the complainant after reasonable attempts.
  - c. The complainant fails to respond to repeated requests for additional information needed to process the complaint.
14. DRPT will serve as the appealing forum to a complainant that is not satisfied with the outcome of an investigation conducted by Grafton. 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-TC1200 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 Document

#### **IV. 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 Grafton utilizes effective means of providing information and receiving public input on transportation decisions from low income, minority and limited English proficient (LEP) populations, as required by Title VI of the Civil Rights Act of 1964 and its implementing regulations

Under federal regulations, transit operators must take reasonable steps to ensure that Limited English Proficient (LEP) persons have meaningful access to their programs and activities. This means that public participation opportunities, normally provided in English, should be accessible to persons who have a limited ability to speak, read, write, or understand English.

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

Of note, Grafton is a private organization and only provides transportation services to all individuals enrolled in one of its established programs such as a private day school, community group home, and residential treatment center. Guardians of individuals enrolled in these programs receive a description of transportation services provided through the Parent/Guardian Manual. In addition, clients receive this description in their Orientation Manual. This understanding of transportation services is clearly defined with all payor sources.

Periodically, Grafton solicits feedback from guardians and clients, at least quarterly, which may include comments and input related to transportation. This feedback is documented in each client's treatment plan. Grafton insures that needed interpretation services are provided.

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

- Solicitation of feedback as documented in client's treatment plans.
- Interpretation services are secured for clients, as needed.
- Transportation, as part of certain Grafton programs, is identified in the Parent/Student Manual.
- Collaboration with involved Community Services Boards to assure Grafton clients'

transportation needs are met.

SEE APPENDIX E-Summary of Outreach Efforts

## **V. 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 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. This includes providing meaningful access to individuals who are limited in their use of English. The following LEP language implementation plan, developed by Grafton is based on FTA guidelines.

As required, Grafton developed a written LEP Plan (below). Using the 2017 American Community Survey (ACS) Census data and Grafton's client census data, Grafton has evaluated the data to determine the extent of need for translation services of its vital documents and materials related to utilization of its transportation services, bearing in mind that Grafton only provides transportation services to the 327 clients in its school and residential programs (census data dated 8-26-15).

### **Assessment of Needs and Resources**

The need and resources for LEP language assistance were determined through an analysis of Grafton's clientele to whom it delivers transportation services. Grafton considered the 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**

Grafton has reviewed census data on the number of individuals in its service areas that have limited English proficiency, as well as the languages they speak, and compared it to Grafton’s client census data.

**U.S. Census Data – American Community Survey 2015-2020**

Data from the U.S. Census Bureau’s American Community Survey (ACS) were obtained through [www.census.gov](http://www.census.gov) for Grafton Integrated Health Network’s service areas, where Grafton provides transportation to its clients. Of note, data was not available for Clarke County, Frederick County, and Winchester City, Virginia. Grafton found data on persons with Limited English Proficiency in three key geographic areas served by the organization: Chesterfield County, Loudoun County, and Richmond City, Virginia. The chart below shows information on the general population of those areas compared to Grafton’s actual clientele for whom Grafton provides transportation. The agency’s service area includes a total of **58,947 or 6.22%** persons with Limited English Proficiency (those persons who indicated that they spoke English “less than very well,” in the 2015-2020 ACS Census).

• <b>Spanish</b>	74,720	7.84%
• <b>Other Indo-European</b>	42,849	4.52%
• <b>Asian and Pacific Island</b>	37,550	3.96%
• <b>Other Languages</b>	9,767	1.03%

Information from the updated ACS also provides more detail on the specific languages that are spoken by those who report that they speak English less than very well. The next chart indicates the estimated number of persons (when available), by service area, who speak languages other than English and the percentage of those persons who have LEP.



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

All of Grafton's clients in its residential and private day school programs, as indicated in the Grafton data above, are provided with transportation services daily, as needed, according to their personal needs (such as medical and leisure needs) and individual treatment plans (such as vocational or education opportunities and requirements).

Grafton will continue to assess the needs of the emerging populations, as updated Census and ACS data become available for our service areas, and the needs of its own clientele, specifically LEP individuals, accordingly. Translation services will be provided, as needed, to clients and their guardians. As LEP persons contact our agency with serious intent to become clients, Grafton attempts to identify their language and keeps records on such contacts.

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

Grafton is the sole provider of all transportation services to its clients who receive residential services. Grafton provides some transportation services to its clients who receive day services only. Transportation services include:

- For residential clients who attend school - transportation to and from residences to school
- For residential clients who are adults - transportation to and from vocational training opportunities or work (if employed)
- Transportation to and from medical appointments
- Transportation to and from community activities for leisure purposes
- Transportation to and from other community services - shopping, library, etc.

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

*Costs*

Grafton currently utilizes the Google "Translate" option for information on its website. When face-to-face translation services are required, Grafton will work with a client's placing agency to secure the services and will negotiate with the agency to cover the associated costs to ensure that client and guardian needs are met.

**LEP Implementation Plan**

Through the four-factor analysis, Grafton has determined that a written Language Implementation Plan is not required at this time which is permissible under FTA Circular C 4702.1A. Grafton understands that the absence of a written LEP plan does not obviate the underlying obligation to ensure meaningful access by LEP persons to our program or activities. When appropriate, Grafton will provide translation of vital documents, provide access to language assistance services, and provide staff training on policies and procedures related to assisting LEP persons.

**VI. MINORITY REPRESENTATION ON PLANNING AND ADVISORY BODIES**

Title 49 CFR Section 21.S(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."

Grafton is a non-profit organization led by a volunteer Board of Directors. Members are selected with consideration given to areas of expertise relevant to the services and business needs of Grafton.

Grafton currently utilizes the Google “Translate” option for information on its website. When face-to-face translation services are required, Grafton will work with a client’s placing agency to secure the services and will negotiate with the agency to cover the associated costs to ensure that client and guardian needs are met.

As of November 1, 2021 there are 12 members of Grafton’s Board of Directors.

**SEE APPENDIX F – Table Minority Representation on Committees by Race**

**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 the DRPT.



**Title VI Notice to the Public**

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

*Grafton 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 4702.18. If a person receiving services feels they are being denied participation in or being denied benefits of the transit services provided by Grafton, or otherwise being discriminated against because of race, color, national origin, gender, age, or disability, Grafton's contact information is:*

*Vanessa Lane, CAO, Title VI Manager  
Grafton Integrated Health Network  
PO Box 2500  
Winchester, VA 22604  
540-542-0200  
vanessa.r.lane @grafton.org*

*For additional information on Grafton's nondiscrimination policies and procedures, please visit the website at [www.grafton.org](http://www.grafton.org) or contact the Title VI Manager noted above.*

*Instructions for filing Title VI complaints are posted on Grafton's website (please see the Title VI link) and included within Grafton's Parent/Client Manual.*



**Grafton Integrated Health Network  
Title VI Notice to the Public List of Locations**

- Agency website: <http://www.grafton.org/about/>
- Parent/Client Handbook





Grafton Integrated Health Network  
ADA\* and Title VI Complaint Form

Section I

Name: \_\_\_\_\_

Address: \_\_\_\_\_

Telephone (Home): \_\_\_\_\_

Telephone (Work): \_\_\_\_\_

E-Mail: \_\_\_\_\_

Accessible Format Requirements?     Large Print     TDD     Audiotape     Other: \_\_\_\_\_

Section II

Are you filing this complaint on your own behalf?     Yes\*     No

[If Yes, please go to Section III]

If No, 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 permission of the aggrieved party.     Yes     No

Section III

I believe discrimination I experienced was based on (all that apply):  Race  Color  National Origin  Disability

Date of Alleged Discrimination (Month, Day, Year): \_\_\_\_\_

Explain as clearly as possible what happened and why you believe you were discriminated against. Please include all persons who were involved, 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 need, please use the back of this form. \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

Section IV

Have you previously filed a Title VI complaint with this agency?     Yes     No

Section V

Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?

Yes     No    If Yes, please specify: \_\_\_\_\_ Who is a contact

person at the agency/court where the complaint was filed. \_\_\_\_\_

Section VI

Name of agency complaint is against: \_\_\_\_\_ Contact Person: \_\_\_\_\_

Contact's Title: \_\_\_\_\_ Telephone: \_\_\_\_\_

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

Signature and Date required: \_\_\_\_\_

Signature

Date



**Grafton Integrated Health Network**  
**Title VI Investigations, Lawsuits, and Complaints**

**Investigations**

<b>Date</b>	<b>Description</b> (Include basis of complaint: race, color, national origin)	<b>Status</b>	<b>Action(s) Taken</b>

**Lawsuits**

<b>Date</b>	<b>Description</b> (Include basis of complaint: race, color, national origin)	<b>Status</b>	<b>Action(s) Taken</b>

**Complaints**

<b>Date</b>	<b>Description</b> (Include basis of complaint: race, color, national origin)	<b>Status</b>	<b>Action(s) Taken</b>



## Appendix E

### Grafton Integrated Health Network Title VI Summary of Outreach Efforts

- Solicitation of feedback as documented in client's treatment plans.
- Interpretation services are secured for clients, as needed.
- Transportation, as part of certain Grafton programs, is identified in the Parent/Student Manual.
- Collaboration with involved Community Services Boards to assure Grafton clients' transportation needs are met.



**Grafton Integrated Health Network  
 Minority Representation on Planning and Advisory Bodies  
 (Grafton Board of Directors)**

With 12 members on Grafton's Board of Directors:

	<b>Black or African American</b>	<b>White/Caucasian</b>	<b>Latino/Hispanic</b>	<b>American Indian or Alaska Native</b>	<b>Asian</b>	<b>Native Hawaiian or other Pacific Islander</b>	<b>Other</b>
<b>Members, Board of Directors</b>	1	11	0	0	0	0	0
<b>% of Board</b>	8.3	91.7	0	0	0	0	0

