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**Title VI Plan and Procedures**  
**Title VI of the Civil Rights Act of 1964**

**Friendship Industries, Inc.**



**Adopted date**

**April 13, 2015**

Final Revision November 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.

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

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

This document details how Friendship Industries, Inc. incorporates nondiscrimination policies and practices in providing services to the public. Friendship Industries, Inc.'s Title VI policies and procedures are documented in this plan and its appendices and attachments. This plan will be updated periodically (every three years) to incorporate changes and additional responsibilities that arise.

## II. OVERVIEW OF SERVICES

Friendship Industries, and its affiliate Able Solutions, are not-for-profit businesses with a social mission to employ and provide training for persons with disabilities and other obstacles to employment within Harrisonburg and Rockingham County. Our Employment Transportation Program equips rural individuals with disabilities and other obstacles the skills and tools they need for long-term economic self-sufficiency by providing access to income and employment opportunities through transportation.

Disabled or not, transportation is a key component to getting to a job. Friendship Industries decided to add vans to our rehabilitation programs in 1971. Due to that foresight, Friendship Industries has been able (with United Way, DRPT, and community support), to provide transportation to work for a population that otherwise may not find employment.

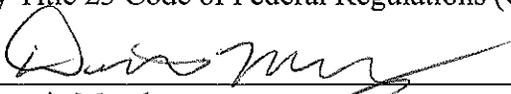
In this way, DRPT funds support Friendship Industries' Employment Services employees living in rural Rockingham County to have the chance for employment using safe and reliable transportation.

### III. POLICY STATEMENT AND AUTHORITIES

#### Title VI Policy Statement

Friendship Industries Inc. 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 Friendship Industries Inc. Human Resources office 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.

  
\_\_\_\_\_  
Dennis Monday  
President

11-28-18  
Date

#### Authorities

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

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

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

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

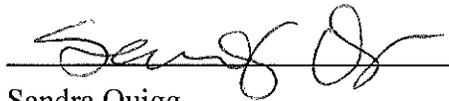
As part of the Certifications and Assurances submitted to DRPT with the Grant Application and all Federal Transit Administration grants submitted to the DRPT Friendship Industries submits a Nondiscrimination Assurance which addresses compliance with Title VI as well as nondiscrimination in hiring (EEO)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

In signing and submitting this assurance, Friendship Industries Inc. confirms to DRPT the agency's commitment to nondiscrimination and compliance with federal and state requirements.

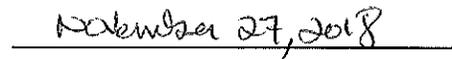
## V. PLAN APPROVAL DOCUMENT

Board meeting minutes are available upon request. Friendship Industries minutes of December 2018 will show that the updated Title VI plan was reviewed and approved. The Company's Title VI Plan and Procedures is reviewed by the Board's Policy and Procedures Committee.

I hereby acknowledge the receipt of the Friendship Industries Title VI Implementation Plan 2018-2021. 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.



Sandra Quigg  
Director of Organizational Sustainability  
Friendship Industries



DATE

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

The Friendship Industries' **Human Resource Office and Organizational Sustainability** are 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 **Director of Human Resource** and **Director of Organizational Sustainability** 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 Director of Human Resource**

The Director of Human Resources is charged with the responsibility for implementing, monitoring, and ensuring compliance with Title VI regulations. Title VI responsibilities are as follows:

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

## **General Title VI responsibilities of the agency**

Friendship Industries is responsible for substantiating that the 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, Friendship Industries 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.

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

As a sub-recipient of FTA funds, Friendship Industries 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. Friendship Industries, Inc. will also maintain and provide to DRPT an annual basis. Friendship Industries' transportation is open exclusively to the work population being served by the mission therefore, the outreach provided is solely in recruitment for employees, of which all fall into minority and low-income populations.

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 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 **Human Resource Office and Organizational Sustainability** 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 or 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. Friendship Industries will report the complaint to DRPT within three business days (per DRPT requirements), and make a concerted effort to resolve complaints locally, using the agency’s Title VI Complaint Procedures. All Title VI complaints and their resolution will be logged as described under 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 **Human Resource Office and Organizational Sustainability** will determine whether or not an update is needed.

#### **7. Internal education**

As applicable, 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 **Human Resource Office**.

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

In all federal procurements requiring a written contract or Purchase Order (PO), Friendship Industries’ contract/PO will include appropriate non-discrimination clauses. Friendship Industries will work with those who are 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 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, Friendship Industries 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.

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).

Friendship Industries is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transportation services on the basis of race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1B. If you feel you are being denied participation in or being denied benefits of the transit services provided by Friendship Industries, or otherwise being discriminated against because of your race, color, national origin, gender, age, or disability, our contact information is:

**Human Resource Office  
Friendship Industries, Inc.  
801 Friendship Drive  
Harrisonburg, VA 22802  
540/434-9586  
compliance@friendship-industries.com**

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

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

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

## VIII. 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 Friendship Industries, Inc. if that person believes that he or she has been subjected to unequal treatment or discrimination in the receipt of benefits or services. We will report the complaint to DRPT within three business days (per DRPT requirements), and make a concerted effort to resolve complaints locally, using the agency's Nondiscrimination Complaint Procedures. All Title VI complaints and their resolution will be logged and reported annually (in addition to immediately) to DRPT.

Friendship Industries includes the following language on the interior of each vehicle operated in passenger service. With regard to transportation services, Friendship Industries includes this information on relevant printed information materials, on the agency's website relevant to services, in relevant press releases, in relevant public notices, in relevant published documents, when discussing and/or in relation to transportation services:

*Friendship Industries 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 Friendship Industries' nondiscrimination policies and procedures, or to file a complaint, please visit the website at [www.Friendship-Industries.com](http://www.Friendship-Industries.com) or contact Human Resource Office, Friendship Industries, Inc., 801 Friendship Drive, Harrisonburg, VA 22802.*

*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.*

**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 Friendship Industries, 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 Friendship Industries' Human Resource Office. 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). If requested, appropriate assistance will be provided by Friendship Industries to complete and submit the complaint form.
  - 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 Friendship Industries' Human Resources at 801 Friendship Drive, Harrisonburg, VA, 22802 **or** [compliance@friendship-industries.com](mailto:compliance@friendship-industries.com)
  - e. Complaints received by any other employee of Friendship Industries will be immediately forwarded to the Director of Human Resources.
  - 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 Human Resources. Under these circumstances, the complainant will be interviewed, and a staff member and/or the interpreter will assist the complainant in converting the verbal allegations to writing.
2. Upon receipt of the complaint, Human Resources will immediately:
  - a. notify DRPT (no later than 3 business days from receipt)
  - b. notify the Friendship Industries' President/CEO
  - c. ensure that the complaint is entered in the complaint database

3. Within 3 business days of receipt of the complaint, Human Resources 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, Human Resources 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. Human Resources 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. Human Resources 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, Human Resources 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 President, DRPT, and, if appropriate, Friendship Industries' legal counsel.
12. Human Resources 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 Friendship Industries, Inc. 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 Document**

## **IX. 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 Friendship Industries 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.

Friendship Industries 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.

Friendship Industries Inc. 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.

**SEE APPENDIX E-Summary of Outreach Efforts and Non-Discrimination Policy**

Friendship Industries' transportation services are open exclusively to the work population being served by Friendship Industries' mission. Therefore, the recruitment of employees, all of whom fall into minority and low-income populations, is the only public outreach activity undertaken by Friendship Industries. Friendship Industries outreach efforts for transportation to and from our employment facilities include:

- Communicate to referring agency case managers the availability of transportation for the areas we serve.
- Notify program participants of the availability of transportation services for the areas we serve.
- Individual, and small and large group meetings are used to communicate the availability of services to internal and external referring services.

## **X. LANGUAGE ASSISTANCE PLAN FOR PERSONS WITH LIMITED ENGLISH PROFICIENCY (LEP)**

### **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 Friendship Industries is based on FTA guidelines.

As required, Friendship Industries developed a written LEP Plan (below). Using American Community Survey (ACS) data, Friendship Industries 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. However, Friendship Industries transportation program is focused on providing employment transportation to and from our employment bases.

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

The need and resources for LEP language assistance were determined through a four-factor analysis as recommended by FTA guidance.

##### **Factor 1: Assessment of the Number and Proportion of LEP Persons Likely to be Served or Encountered in the Eligible Service Population**

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

## U.S. Census Data – American Community Survey (2011-2015)

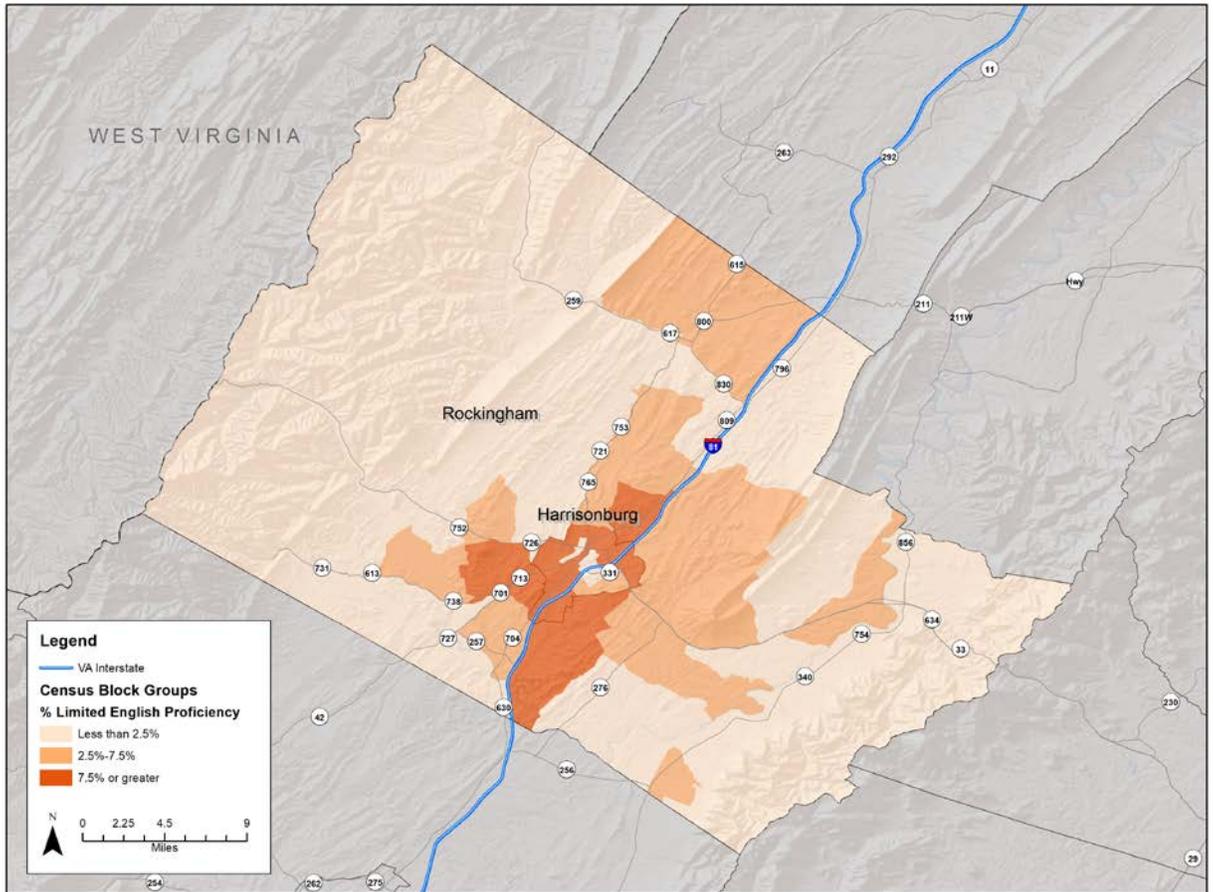
Data from the U.S. Census Bureau’s American Community Survey (ACS) were obtained through [www.census.gov](http://www.census.gov) by Friendship Industries’ service area. The agency’s service area includes a total of 2,565 (3.49%) persons with Limited English Proficiency (those persons who indicated that they spoke English “less than very well,” in the 2011-2015 ACS Census).

Information from the 2011-2015 ACS also provides more detail on the specific languages that are spoken by those who report that they speak English less than very well. Languages spoken at home by those with LEP are presented below. These data indicate the extent to which translations into other language are needed to meet the needs of LEP persons.

**Table 1 – LEP by Language Spoken in Friendship Industries’ Service Area**

Friendship Industries Service Area			
Language	Number of LEP Population	Percent of Service Area Population Speaking Language	% LEP Population Speaking Language
Spanish or Spanish Creole	5,755	4.71%	68.57%
Russian	609	0.50%	7.26%
Arabic	435	0.36%	5.18%
Chinese	372	0.30%	4.43%
African languages	313	0.26%	3.73%
Other Indo-European languages	259	0.21%	3.09%
Other Slavic languages	114	0.09%	1.36%
Serbo-Croatian	89	0.07%	1.06%
Korean	70	0.06%	0.83%
Italian	69	0.06%	0.82%
Japanese	54	0.04%	0.64%
Urdu	53	0.04%	0.63%
Vietnamese	48	0.04%	0.57%
Hindi	36	0.03%	0.43%
French	25	0.02%	0.30%
Portuguese or Portuguese Creole	15	0.01%	0.18%
Gujarati	14	0.01%	0.17%
Other Pacific Island languages	12	0.01%	0.14%
Tagalog	11	0.01%	0.13%
Scandinavian languages	10	0.01%	0.12%
Greek	9	0.01%	0.11%
Mon-Khmer	9	0.01%	0.11%
Hungarian	7	0.01%	0.08%
Other Indic languages	5	0.00%	0.06%
<b>Total LEP Population</b>	<b>8,393</b>	<b>6.86%</b>	
<b>Total Service Area Population</b>	<b>122,312</b>		

**Figure 1 - % LEP by Census Block Group**



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

Friendship Industries reviewed the relevant benefits, services, and information provided by the agency and determined the extent to which LEP persons come into contact with these functions through the transit services are minimal. They may include:

- Calls to Friendship Industries’ office telephone line;
- Visits to the agency’s headquarters;
- Contact with transit vehicle operators;
- Access to the agency’s website.

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

Friendship Industries provides transportation to and from work each day for program participants and employees who reside in Rockingham County. The company’s affiliate, Able Solutions Incorporated (ASI), provides transportation to and from work each day

for those with obstacles to employment, too. Currently, there are 4 fixed routes operating five days each week, Monday thru Friday, early in the morning and in the afternoon.

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

- Safety and security awareness instructions
- Emergency evacuation procedures
- Notification of available translation services
- Explanation of ADA paratransit services, including eligibility certification process

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

The following language assistance measures are currently being provided by Friendship Industries' staff and various agencies.

- Services include language interpreters, producing pictographs, and using multilingual technology.

#### **LEP Implementation Plan**

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

- Use of multilingual technology
- Continuing use of language interpreters
- Continuing use of multilingual staff

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

Agency staff who come into contact with LEP persons can access language services by transferring a call to bilingual staff. Staff, especially Human Resources, will have a list of available language assistance services and additional information and referral resources. This list will be updated at least annually.

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

The following procedures are followed when an LEP person visits our administrative office:

- Contact should be made with bilingual operating staff to assist with the communication.
- Arrangements can be made to have an interpreter meet with the individual.
- Utilize multilingual technology.

The following procedures are suggested to operators when an LEP person has a question on board a Friendship Industries vehicle:

- Contact should be made with bilingual operating staff to assist with the communication.
- Use of volunteer translation assistance from fellow passengers or family members.

### ***Staff Training***

As noted previously, specific Friendship Industries staff, especially Human Resources, has a list of available language assistance services and additional information and referral resources. These are reviewed annually and updated as necessary.

All new staff employees receive training on assisting LEP persons as part of their sensitivity and customer service training. This includes:

- A summary of the agency's responsibilities under the DOT LEP Guidance and agency's language assistance plan, and,;
- A description of the agency's cultural sensitivity policies and practices.

Also, all staff who routinely come into contact with customers, as well as their supervisors and all management staff, receive annual refresher training on policies and procedures related to assisting LEP persons. These include but are not limited to:

- Equal Opportunity Employment
- Diversity
- Appropriate Workplace Behavior
- Client's Rights & Responsibilities
- Sexual Harassment
- Code of Ethics
- Grievance Process
- Whistleblower Rights & Responsibilities
- Title VI Plan and Language Assistance Plan for LEP

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

- following our Title VI policy statement included on our vital documents.
- through signs posted on our vehicles and in our facility.
- through ongoing outreach efforts to schools and community organizations.

### ***Monitoring/Updating the plan***

This plan will be updated on a periodic basis (at least every three years), based on feedback, updated demographic data, and resource availability.

Based on informal or formal feedback from community members and agency employees, Friendship Industries will make incremental changes to the type of written and oral language assistance provided as well as to their staff training and community outreach programs. The cost of proposed changes and the available resources will affect the enhancements that can be made, and therefore Friendship Industries will attempt to identify the most cost-effective approaches.

As the community grows and new LEP groups emerge, Friendship Industries will strive to address the needs for additional language assistance.

### **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.”

Friendship Industries has a Board of Directors, the membership of which we select. Their responsibility is to oversee and provide guidance and input in all aspects of our organizations, including but not limited to our transportation services.

The selection process is directed by Friendship Industries’ Board Development Committee. Persons are selected based on the skills sets needed for the effective and efficient operation of the organization. Minority Board member candidates are actively recruited.

**SEE APPENDIX F- TABLE MINORITY REPRESENTATION OF BOARD BY RACE**

## **XI. Monitoring Title VI Complaints**

As part of the complaint handling procedure, Human Resources 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 Human Resource office periodically reviews all complaints received to determine if there may be a pattern. At a minimum, this review is conducted as part of preparing the Annual Report and Update for submission to DRPT.

**APPENDIX A - TITLE VI NOTICE TO THE PUBLIC**

**APPENDIX B - TITLE VI NOTICE TO THE PUBLIC LIST OF LOCATIONS**

**APPENDIX C - TITLE VI COMPLAINT FORM**

**APPENDIX D - INVESTIGATIONS, LAWSUITS AND COMPLAINTS DOCUMENT**

**APPENDIX E - SUMMARY OF OUTREACH EFFORTS**

**APPENDIX F -TABLE MINORITY REPRESENTATION ON COMMITTEES BY RACE**



## APPENDIX 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, Friendship Industries 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.

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).

Friendship Industries is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transportation services on the basis of race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1B. If you feel you are being denied participation in or being denied benefits of the transit services provided by Friendship Industries, or otherwise being discriminated against because of your race, color, national origin, gender, age, or disability, our contact information is:

**Human Resources  
Friendship Industries, Inc.  
801 Friendship Drive  
Harrisonburg, VA 22802  
540/434-9586  
[compliance@friendship-industries.com](mailto:compliance@friendship-industries.com)**





**Appendix B**  
**Title VI Public Notice List of Locations**

**Break Room**  
**All Friendship Industries ' Passenger Vans**  
**Reception Area**  
**Notice Board**

**Human Resources**  
**Friendship Industries, Inc.**  
**801 Friendship Drive**  
**Harrisonburg, VA 22802**  
**540/434-9586**  
**[compliance@friendship-industries.com](mailto:compliance@friendship-industries.com)**



## APPENDIX C

### Friendship Industries – TITLE VI COMPLAINT FORM

<b>Section I:</b>			
Name:			
Address:			
Telephone (Home):		Telephone (Work):	
Electronic Mail Address:			
Accessible Format Requirements?	Large Print		Audio Tape
	TDD		Other
<b>Section II:</b>			
Are you filing this complaint on your own behalf?		Yes*	No
*If you answered "yes" to this question, go to Section III.			
If not, please supply the name and relationship of the person for whom you are complaining:			
Please explain why you have filed for a third party: _____			
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.		Yes	No
<b>Section III:</b>			
I believe the discrimination I experienced was based on (check all that apply):			
<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin			
Date of Alleged Discrimination (Month, Day, Year): _____			
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.			
_____ _____			
<b>Section IV:</b>			
Have you previously filed a Title VI complaint with this agency?		Yes	No
<b>Section V:</b>			
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:	
<b>Section VI</b>	
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

**APPENDIX D**

**Friendship Industries List of Investigations, Lawsuits and Complaints**

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

## **APPENDIX E**

### **Summary of Outreach Efforts and Non-Discrimination Policy**

Friendship Industries Outreach efforts include:

- Communicate to referring agency case managers the availability of transportation for the areas we serve.
- Notify program participants of the availability of transportation services tot areas we serve.
- Service are provided without regard to any protected status.
- Individual, and small and large group meetings are used to communicate the availability of services to internal and external referring services.
- At least annually notify potential participants verbally and in-writing of our non-discrimination policy.



