

Title VI Plan and Procedures

Title VI of the Civil Rights Act Of 1964

Danville Parks and Recreation



Adopted March 21, 2022

TABLE OF CONTENTS

I. Introduction	1
II. Overview of Services	2
III. Policy Statement and authorities	3
IV. Nondiscrimination Assurance to DRPT	4
V. Plan Approval Document	5
VI. Organization and Title VI Program Responsibilities	6
VII. Procedures for Notifying the Public of Title VI Rights and How to File a Complaint...9	
VIII. Language Assistance Plan for Persons with Limited English Proficiency	16
Appendix A.....	24
Appendix B.....	25
Appendix C.....	26
Appendix D.....	27

I. INTRODUCTION

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

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

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

Recipients of public transportation funding from FTA and the 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 Danville Parks and Recreation Department incorporates nondiscrimination policies and practices in providing services to the public. Danville Parks and Recreation'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

The City of Danville allows Danville Parks and Recreation to support and provide therapeutic programs offered by Camp Grove Recreation Center for individuals with cognitive and physical impairments (disabilities) of all ages and abilities. The programs enrich the lives of people with impairments by exploring self and community through a wide variety of recreational opportunities and services in a proactive and holistic manner.

Camp Grove Recreation Center is a non-profit facility that provides and promotes programs and activities such as: cooking, crafting, exercising, themed dances and parties, and after school enrichment. The programs ensure recreational opportunities while teaching independence, socialization, leisure education, and lifelong skills. Program benefits include increasing self-esteem, socialization, daily life activities, new leisure, interest, and independence.

In the past ten years, the popularity of programs and activities at Camp Grove Recreation Center has increased exponentially. On average, daily program registration ranges from 10 to 25 individuals; using provided transportation. Camp Grove Recreation Center operates: Monday-Wednesday: 9 a.m. to 3:30 p.m., Thursday 1 p.m. to 6 p.m., and Friday 9 a.m. to 3:30 p.m.

Transportation provided by Danville Parks and Recreation by Camp Grove Recreation Center staff is offered to individuals with cognitive and physical impairments of all ages and abilities. This transportation is offered to and from programs, both at Camp Grove Recreation Center and other locations.

III. POLICY STATEMENT AND AUTHORITIES

TITLE VI POLICY STATEMENT

Danville Parks and Recreation 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 Danville Parks and Recreation 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.

Charlene Presley

Signature of Authorizing Official

3/21/22

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 Annual Grant Application and all Federal Transit Administration grants submitted to the DRPT, Danville Parks and Recreation 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, Danville Parks and Recreation confirms to DRPT the agency's commitment to nondiscrimination and compliance with federal and state requirements.

V. PLAN APPROVAL DOCUMENT

I hereby acknowledge the receipt of the Danville Parks and Recreation Title VI Implementation Plan. 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 Danville Parks and Recreation transportation 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.

Ken Larking

Signature of Authorizing Official

Ken Larking, City Manager

City of Danville, Virginia

3/21/22

Date

VI. ORGANIZATION AND TITLE VI PROGRAM RESPONSIBILITIES

The **Division Director of Special Recreation** 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 follows:

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

GENERAL TITLE VI RESPONSIBILITIES OF THE AGENCY

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

1. Data collection: To ensure that Title VI reporting requirements are met, Danville Parks and Recreation 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, Danville Parks and Recreation 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. Danville Parks and Recreation will also maintain and provide to DRPT 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 notice to the public that it complies with Title VI and instructions on how to file a discrimination complaint

3. Annual Review of Title VI Program

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

4. Dissemination of information related to the Title VI program

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

5. Resolution of complaints

Any individual may exercise his or her right to file a complaint if that person believes that he, she or any other program beneficiaries have been subjected to unequal treatment or discrimination in the receipt of benefits/services or prohibited by non-discrimination requirements. Danville Parks and Recreation 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 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 Division Director of Special Recreation

8. Title VI clauses in contracts

In all federal procurements requiring a written contract or Purchase Order (PO), Danville Parks and Recreation Department’s contract/PO will include appropriate non-discrimination clauses. The Title VI Manager will work with the Purchasing Director who is/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, 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).

Danville Parks and Recreation 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 Danville Parks and Recreation/Stonewall Therapeutic Recreation Center, or otherwise being discriminated against because of your race, color, national origin, gender, age, or disability, our contact information is:

Name	Charlene Presley
Title	Division Director of Special Recreation
Agency Name	Danville Parks and Recreation
Address	P.O. Box 3300
City, State, Zip Code	Danville, Virginia 24543-3300
Telephone	434-799-5216
Email	preslcj@danvilleva.gov

See Appendix A – Title VI Notice to the Public: List of Locations

TITLE VI COMPLAINT PROCEDURES

Requirement to Develop Title VI Complaint Procedures and Complaint Form.

In order to comply with the reporting requirements established in 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 Danville Parks and Recreation Department 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.

Danville Parks and Recreation 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:

Danville Parks and Recreation 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 Danville Parks and Recreation's nondiscrimination policies and procedures, or to file a complaint, please visit the website <https://www.danvilleva.gov/play> or contact Charlene Presley, Division Director of Special Recreation, P.O. Box 3300, Danville, Virginia 24543-3300.

Instructions for filing Title VI complaints are posted on the agency's website and on posters in the interior of each vehicle operated in passenger service and agency's facilities.

SEE APPENDIX B-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 Danville Parks and Recreation 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).
 - 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 Danville Parks and Recreation Title VI Manager at Danville Parks and Recreation Department P.O. Box 3300 Danville, VA 24543-3300 or preslcj@danvilleva.gov.
 - e. Complaints received by any other employee of Danville 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, and the Division Director of Special Recreation or their designee 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 the City of Danville Americans with Disabilities Act (ADA) Coordinator
 - b. notify the Danville Parks and Recreation 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, DRPT, and, if appropriate, Danville Parks and Recreation'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 Danville Parks and Recreation. DRPT will analyze the facts of the case and will issue its conclusion to the appellant according to their procedures.

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.

List of Investigations, Lawsuits and Complaints

	Date (MM/DD/YYYY)	Summary (include basis of complaint: race, color, or national origin)	Status	Action(s) Taken
Investigations				
1.				
Lawsuits				
1.				
Complaints				
1.				

SEE APPENDIX C-Investigations, Lawsuits, and Complaints Document

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 Danville Parks and Recreation 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.

Danville Parks and Recreation 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.

Danville Parks and Recreation 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.

NOTE: FTA has developed a circular, 4703.1, "Environmental Justice Policy Guidance for Federal Transit Administration Recipients," that includes many examples of effective strategies for engaging minority and low-income populations. FTA Chap. III-6 FTA C 4702.1B encourages recipients to review that circular for ideas when developing their public engagement strategy.

A Sample of Effective Public Outreach Practices Includes:

1. Determining and identifying what meetings and program activities lend themselves to client public participation.
2. Scheduling meetings at times and locations that are convenient and accessible for minority and LEP communities.
3. Employing different meeting sizes and formats.
4. Coordinating with community and faith-based organizations, educational institutions, and other organizations to implement public engagement strategies that reach out specifically to members of affected minority and/or LEP communities.
5. Considering radio, television, or newspaper ads on stations and in publications that serve LEP populations. Outreach to LEP populations could also include audio programming available on podcasts.
6. Providing opportunities for public participation through means other than written communication, such as personal interviews or use of audio or video recording devices to capture oral comments.

Additional outreach efforts could include providing a translator for public meetings upon request from LEP individuals and providing a supplemental public notice that is translated for LEP populations.

SEE APPENDIX D – Summary of Outreach Efforts

VIII. LANGUAGE ASSISTANCE PLAN FOR PERSONS WITH LIMITED ENGLISH PROFICIENCY

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 Danville Parks and Recreation is based on FTA guidelines.

As required, Danville Parks and Recreation developed a written LEP Plan (below). Using the 2019 five year estimates from the American Community Survey (ACS) Census data, Danville Parks and Recreation has evaluated data to determine the extent of need for translation services of its vital documents and materials.

LEP persons can be a significant market for public transit, and reaching out to these individuals can help increase their utilization of transit. Therefore, it also makes good business sense to translate vital information into languages that the larger LEP populations in the community can understand.

ASSESSMENT OF NEEDS AND RESOURCES

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

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

Danville Parks and Recreation 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)

Data from the U.S. Census Bureau’s American Community Survey (ACS) were obtained through www.census.gov by Danville Parks and Recreation’s service area. The agency’s service area includes a total of 861(2.23%) persons with Limited English

Proficiency (those persons who indicated that they spoke English “less than very well,” in the 2019 ACS 5 year estimates). It is noted that there are relatively low number of LEP persons in the service area -no language is spoken by over 5% or a total of 1,000 persons in the LEP population.

Language Spoken at Home and English-Speaking Ability for the Population of the City									
	Total Population		Speak non-English at Home						Total Population
	Total Pop.	Speak English at Home	Total Pop.	Percent	Total that Speak English "very well"	Percent that Speak English "very well"	Total that Speak English less than "very well"	Percent that Speak English less than "very well"	Percent of Pop. That Speaks English less than "very well"
Danville City	38,658	36,641	2,010	5.2%	1,149	57.2%	861	42.8%	2.23%

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

Danville Parks and Recreation reviewed the relevant benefits, services, and information provided by the agency and determined the extent to which LEP persons have come into contact with these functions through one or more of the following channels:

- Contact with transit vehicle operators;
- Contact with transit station managers;
- Calls to Danville Parks and Recreation’s and Camp Grove Recreation Center general telephone line;
- Visits to the agency’s Main Office;
- Access to the agency’s website;
- Attendance at community meetings or public hearings hosted by Danville Parks and Recreation;
- Contact with the agency’s ADA complementary paratransit system (including applying for eligibility, making reservations, and communicating with drivers). This channel is available through Danville Mass Transit Department Reserve a Ride.

At this point in time, individuals with cognitive, physical, developmental, and autism impairments utilizing Danville Parks and Recreation and Camp Grove Recreation Center Federal Transportation 5310 transportation services are English speaking and one individual with Spanish speaking parents. The individuals are non-traditional LEP due to their intellectual impairments.

Danville Parks and Recreation will continue to identify emerging populations as updated Census and American Community Survey data become available for our service area. In addition, when LEP persons contact our agency, we attempt to identify their language and keep records on contacts to accurately assess the frequency of contact. To assist in language identification, we use a language identification flashcard based on that which was developed by the U.S. Census. (<http://www.lep.gov/ISpeakCards2004.pdf>), interpreters in the area, and staff proficient in Spanish

and contact with Office of Human Rights of the District of Columbia (202) 727-4559 press 0 (<http://www.ohr.dc.gov>)

Information from Community Organizations that Serve LEP Persons

To supplement the Census, education, and labor department data, Danville Parks and Recreation conducted community outreach to the following organizations that work with LEP populations.

- Local school system
- Community organizations
- Local government

Phone surveys will be conducted with Danville Public School Exceptional Education Director and Support Services of Virginia-Danville, Negril, and Danville-Pittsylvania Community Services Board when applicable.

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

Danville Parks and Recreation provides the following programs, activities and services:

Transportation is available to and from programs, both at Camp Grove Recreation Center and other locations: schools, businesses in the city and surrounding areas. Daily program registration ranges from 10 to 25 individuals; using provided transportation from Danville Parks and Recreation-Camp Grove Recreation Center. Camp Grove Recreation Center operates: Monday-Wednesday: 9 a.m. to 3:30 p.m., Thursday 1 p.m. to 6 p.m., and Friday 9 a.m. to 3:30 p.m.

Danville Parks and Recreation-Camp Grove Recreation Center provide individuals with cognitive and physical impairments of all ages and abilities a variety of programs and activities such as: cooking, crafting, exercising, themed dances and parties, and after school enrichment. The programs ensure recreational opportunities while teaching independence, socialization, leisure education, and lifelong skills. Program benefits include increasing self-esteem, socialization, daily life activities, new leisure, interest, and independence.

The following are the most critical services provided by Danville Parks and Recreation for all customers, including LEP persons.

- Safety and security awareness instructions
- Emergency evacuation procedures
- Paratransit services
- Services targeted at low-income persons

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

Costs

The following language assistance measures currently being provided and planned to be used by Danville Parks and Recreation.

- Danville Parks and Recreation plans to have interpreters in the area and staff fluent in Spanish assist in translating documents. Danville Parks and Recreation will contact the Office of Human Rights District of Columbia (202) 727-4559 for more assistance. Currently no time has been associated with the use of language translation assistance.

Based on the analysis of demographic data and contact with community organizations and LEP persons, Danville Parks and Recreation has determined that additional services are not needed at this time to provide meaningful access; however, when the needed is identified resources will be provided.

Resources

The available budget that could be currently devoted to additional language assistance expenses is \$100. This amount is likely to stable over time.

Potential cost saving measures, in-kind assistance may be available through community organizations, other city or county departments, other transit agencies who may be able to partner for language assistance services. Other cost saving measures include use of ISpeak cards, contact the Office of Human Rights District of Columbia that provides free translation for LEP individuals. Partner with other agencies that have access to language assistance products that have been developed and paid for by local, regional, or state government agencies and may also have bilingual staff that could provide language assistance on an ad hoc or regular basis. Internal departmental bilingual staff could provide language translation currently a staff person at the Camp Grove Recreation Center is bilingual, partner with other departments in the city, seek assistance from local colleges and high school foreign language professors and high school teachers.

In addition, other cost saving measures include telephonic and video conferencing interpretation services, translating vital documents posted on Web sites, pooling resources and standardizing documents to reduce translation needs, centralizing interpreter and translator services to achieve economies of scale.

Feasible and Appropriate Language Assistance Measures

Based on the available resources, the following language assistance measures are feasible and appropriate for our agency at this time:

Employ staff who speak Spanish and can provided language translation, contact Office of Human Rights District of Columbia that provides free translation for LEP individuals, and contact local translators.

LEP IMPLEMENTATION PLAN

Through the four-factor analysis, Danville Parks and Recreation-Camp Grove Recreation Center has determined that the following types of language assistance are most needed and feasible:

- Translation of vital documents into Spanish: Enrollment application, summer applications, initial assessments, and monthly activity calendar
- Retain bilingual staff with competency in spoken and written Spanish
- Use Language Line Translation Services for telephone contacts.
- In-person translation
- Distribute a list of language assistant services to staff

Staff Access to Language Assistance Services

Agency staff who come into contact with LEP persons can access language services by offering individualized language identification flashcard, having a supply of translated documents on hand, transferring a call to bilingual staff. All staff will be provided with a list of available language assistance services and additional information and referral resources such as community organizations which can assist LEP persons. This list will be updated at least annually.

Responding to LEP Callers

Staff who answer calls from the public respond to LEP customers as follows: calls will be transferred to the bilingual staff person in the department or staff will contact the Office of Human Rights District of Columbia that provides free translation for LEP individuals.

Responding to Written Communications from LEP Persons

If a written response to communication is needed from LEP persons, the following procedure would be followed: bilingual staff person would provide written communication or make use of language translation application from Google or Microsoft.

Responding to LEP Individuals in Person

The following procedures are followed when an LEP person visits our customer service and administrative office: The LEP person would be informed of the availability of translation by bilingual staff, indicate use of language identification flashcard if needed, call Office of Human Rights District of Columbia that provides free translation for LEP individuals.

The following procedures are followed by operators when an LEP person has a question on board a Danville Parks and Recreation vehicle: The LEP person would be informed of the availability of translation by bilingual staff the staff person would be contacted by phone, indicate use of language identification flashcard if needed.

Staff Training

As noted previously, all Danville Parks and Recreation staff are provided with a list of available language assistance services and additional information and referral resources, updated annually.

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

- A summary of the transit agency's responsibilities under the DOT LEP Guidance;
- A summary of the agency's language assistance plan;
- A summary of the number and proportion of LEP persons in the agency's service area, the frequency of contact between the LEP population and the agency's programs and activities, and the importance of the programs and activities to the population;
- A description of the type of language assistance that the agency is currently providing and instructions on how agency staff can access these products and services; 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.

Additional training courses or resources could be provided to staff, such as tuition assistance for language courses at local community colleges, training manuals/CDs/DVDs/online courses available to staff, and instruction in basic phrases needed in the operating environment.

Providing Notice to LEP Persons

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
- on our website.
- Through signs posted on our vehicles and in our administrative offices.
- Through ongoing outreach efforts to community organizations, schools, and religious organizations.
- Staffing a table with bilingual staff at community service events of interest to LEP groups.
- Sending translated news releases and public service announcements about the availability of translated information to newspapers and broadcast media that target local LEP communities.

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

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.

As part of ongoing outreach to community organizations, Danville Parks and Recreation will solicit feedback on the effectiveness of language assistance provided and unmet needs. In addition, we

will conduct periodic surveys, focus groups, community meetings, internal meetings with staff who assist LEP persons, review of updated Census data, formal studies of the adequacy and quality of the language assistance provided, and determine changes to LEP needs.

In preparing the triennial update of this plan, Danville Parks and Recreation will conduct an internal assessment using 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.” This checklist attached at the end of this sample plan. The checklist will be provided when the triennial update is required.

Based on the feedback received from community members and agency employees, Danville Parks and Recreation 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 Danville Parks and Recreation will attempt to identify the most cost-effective approaches.

As the community grows and new LEP groups emerge, Danville Parks and Recreation will 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.”

Danville Parks and Recreation does not have an advisory board or committee.

Committee	Black or African American	White/ Caucasian	Latino/ Hispanic	American Indian or Alaska Native	Asian	Native Hawaiian or other Pacific Islander	Other *Note	Totals
Citizens Advisory Committee (CAC)								
% of CAC Committee								
Citizens Advisory Committee on Accessible Transportation (CACAT)								
% of CACAT Committee								

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.

APPENDIX A

TITLE VI NOTICE TO THE PUBLIC: LIST OF LOCATIONS

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

Danville Parks and Recreation 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 Danville Parks and Recreation and Camp Grove Recreation Center the Special Recreation Division, or otherwise being discriminated against because of your race, color, national origin, gender, age, or disability, our contact information is:

Name	Charlene Presley
Title	Division Director of Special Recreation
Agency Name	Danville Parks and Recreation
Address	P.O. Box 3300
City, State, Zip Code	Danville, Virginia 24543-3300
Telephone	434-799-5216
Email	preslcj@danvilleva.gov

List of Locations of Public Notice

1. Bulletin board used for Special Recreation Division at Camp Grove Recreation Center
2. Vans used for Special Recreation Division at Camp Grove Recreation Center
3. Danville Parks and Recreation website <https://www.danvilleva.gov/play>

APPENDIX B

COMPLAINTS DOCUMENT

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"/> State Agency _____
<input type="checkbox"/> Federal Court _____	<input type="checkbox"/> Local Agency _____
<input type="checkbox"/> State Court _____	
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

APPENDIX C

INVESTIGATIONS, LAWSUITS, AND COMPLAINTS

List of Investigations, Lawsuits, and Complaints

	Date (MM/DD/YYYY)	Summary (include basis of complaint: race, color, or national origin)	Status	Action(s) Taken
Investigations				
2.				
Lawsuits				
2.				
Complaints				
2.				

APPENDIX D

SUMMARY OF OUTREACH EFFORTS

Effective Public Outreach Practices Includes:

- a. Determining and identifying what meetings and program activities lend themselves to client public participation.
- b. Scheduling meetings at times and locations that are convenient and accessible for minority and LEP communities. Locations for meetings Ballou Recreation Center and Camp Grove Recreation Center.
- c. Employing different meeting sizes and formats.
- d. Coordinating with community and faith-based organizations, educational institutions, and other organizations to implement public engagement strategies that reach out specifically to members of affected minority and/or LEP communities.
- e. Considering radio, television, or newspaper ads on stations and in publications that serve LEP populations. Outreach to LEP populations could also include audio programming available on podcasts.
- f. Providing opportunities for public participation through means other than written communication, such as personal interviews or use of audio or video recording devices to capture oral comments.