



**Rappahannock Rapidan Community Services Board
DBA Encompass Community Supports**

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

Adopted November 12, 2024

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I. INTRODUCTION

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

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.

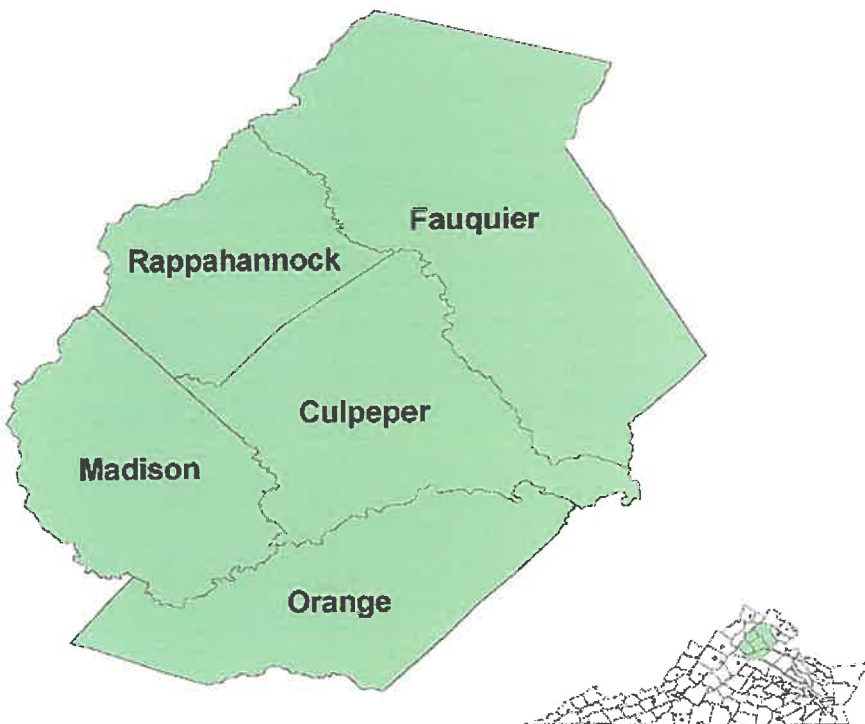
This document details how Rappahannock Rapidan Community Services Board, DBA Encompass Community Supports herein referenced as ("Agency") incorporates nondiscrimination policies and practices in providing services to the public. The Agency's Title VI policies and procedures are documented in this plan 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 Mission of Rappahannock Rapidan Community Services Board, DBA Encompass Community Supports herein referenced as (“Agency”) is to improve the quality of life in Culpeper, Fauquier, Madison, Orange, and Rappahannock Counties by providing comprehensive mental health, substance use, developmental disability, housing, children’s, aging, case management, and transportation services.

In the most recent fiscal year, 5,567 individuals received services at twenty-six separate program sites throughout the area including day support and rehabilitation programs, group homes, inpatient and outpatient services, crisis/emergency services, senior centers/nutrition programs, and adult day care. The Agency is also an active partner with Board representation in Aging Together, Inc., representing over 100 organizations focused on planning for the long-term care needs of senior citizens in the region. The Agency is unique in its combined role as the Area Agency on Aging plus the Community Services Board.

The Agency’s Transportation Services maintains a fleet of passenger vans to facilitate a variety of clinical, community support, and aging/nutrition services for individuals throughout the counties of Culpeper, Fauquier, Madison, Orange, and Rappahannock (PD9). Transportation for medical appointments, supported employment, and social/recreational opportunities are offered as services as well. In FY 2023, 850 individuals received transportation services resulting in 46,945 passenger trips. During the same fiscal year, 303 individuals received home-delivered meal services adding 4,654 trips. The service area is mostly rural and covers 1,965 square miles.

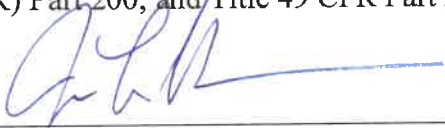


III. POLICY STATEMENT AND AUTHORITIES

Title VI Policy Statement

The Agency 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 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.


James LaGrafte, Executive Director


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.

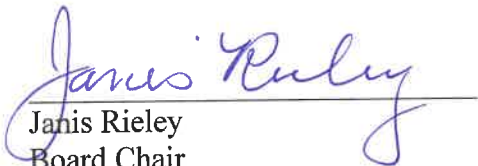
As part of the Certifications and Assurances submitted to the DRPT with the Annual Grant Application and all Federal Transit Administration grants submitted to the DRPT, the Agency submits a Nondiscrimination Assurance which addresses compliance with Title VI as well as nondiscrimination in hiring (EEO)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

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

V. PLAN APPROVAL DOCUMENT

Add meeting minutes from board approval

I hereby acknowledge the receipt of the the Agency Title VI Implementation Plan 2024 - 2026. I have reviewed and approve the Plan. I am committed to ensuring that no person is excluded from participation in, or denied the benefits of any of its services on the basis of race, color, or national origin, as protected by Title VI of the Civil Rights Act of 1964. Specially, I am committed to ensuring that no person is excluded from participation in, or denied the benefits of transit services, as protected under said act, according to Federal Transit Administration (FTA) Circular 4702.1B Title VI requirements and guidelines for FTA sub-recipients.


Janis Rieley
Board Chair

Rappahannock Rapidan Community Services Board
DBA Encompass Community Supports

11/10/24
DATE

VI. ORGANIZATION AND TITLE VI PROGRAM RESPONSIBILITIES

ECS' Quality Improvement Director 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, the Agency will maintain:

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

2. Annual Report and Updates

As a sub-recipient of FTA funds, the Agency 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. The Agency will also maintain and provide to DRPT on an annual basis, the log of public outreach and involvement activities undertaken to ensure that minority and low-income people had a meaningful access to these activities.

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

- A copy of any compliance review report for reviews conducted in the last three years, along with the purpose or reason for the review, the name of the organization that performed the review, a summary of findings and recommendations, and a report on the status or disposition of the findings and recommendations
- Limited English Proficiency (LEP) plan
- Procedures for tracking and investigating Title VI complaints
- A list of Title VI investigations, complaints or lawsuits filed with the agency since the last submission
- A copy of the agency 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. The Agency 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 as well as annually. 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 Resources Director.

8. Title VI clauses in contracts

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

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

Requirement to Provide a Title VI Public Notice

Title 49 CFR Section 21.9(d) requires recipients to provide information to the public regarding the recipient's obligations under DOT's Title VI regulations and apprise members of the public of the protections against discrimination afforded to them by Title VI. At a minimum, the Agency 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.

SEE APPENDIX A - Title VI Notice to the Public

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

TITLE VI COMPLAINT PROCEDURES

Any individual may exercise his or her right to file a complaint with the Agency 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 transportation-related 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 transportation-related complaints and their resolution will be logged and reported annually (in addition to immediately) to DRPT.

The Agency includes the following language on all printed information materials, on the agency's website, in press releases, in public notices, in published documents, and on posters on the interior of each vehicle operated in passenger service:

The Agency does not discriminate on the basis of race, color, national origin, sex, religion, age, disability, or any other characteristic protected by law, in employment matters and in its programs and services.

For materials where cost is based on number of words, such as notices and ads in newspapers and magazines, the statement will read as follows:

The Agency is an equal access and opportunity organization.

For additional information on ECS's nondiscrimination policies and procedures, or to file a complaint, please visit the website at <https://www.encompasscommunitysupports.org/> or contact the Director of Quality Improvement, 15361 Bradford Road, P. O. Box 1568, Culpeper, VA 22701. Telephone: (540) 825-3100.

Instructions for filing Title VI complaints are posted on the agency's website and in posters on the interior of each vehicle operated in passenger service and agency's facilities, and are also included within the Agency's programs and services brochures.

SEE APPENDIX C - Title VI Complaint Form (if the complaint forms are needed in accessible format, such as large print, audio tape, or other, please contact the Director of Quality Improvement)

English Version
Spanish Version

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 be filed against the Agency, the Agency will follow these 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). A Discrimination Complaint Form in English or Spanish has been designed for the complainant's convenience.
 - 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; and,
 - 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 Agency's Title VI Manager, 15361 Bradford Road, P O Box 1568, Culpeper, VA 22701 or QA@ecsva.org.
 - e. Complaints received by any other employee of the Agency 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 or staff. Under these circumstances, the complainant will be interviewed, and the Quality Assurance staff will assist the complainant in converting the verbal allegations to writing.
2. Upon receipt of a transportation-related complaint, the Title VI Manager will immediately:
 - a. Notify DRPT (no later than 3 business days from receipt);
 - b. Notify the Authorizing Official; and,
 - c. Ensure that the complaint is entered in the complaint database.
3. Within three (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; and,
 - 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, if transportation-related, and, if appropriate, ECS'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 transportation-related complainant that is not satisfied with the outcome of an investigation conducted by ECS. 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 transportation-related complaint directly with the Federal Transit Administration, Office of Civil Rights, 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

All recipients shall prepare and maintain a list of any of the following that allege discrimination based on 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

VIII. PUBLIC OUTREACH AND INVOLVEMENT

Public Participation Plan

The Public Participation Plan (PPP) is a guide for ongoing public participation endeavors. Its purpose is to ensure that the Agency 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.

The Agency established a public participation plan or process that will determine how, when, and how often, specific public participation activities should take place, and which specific measures are most appropriate.

The Agency will make these determinations based on a demographic analysis of the population(s) affected, the type of plan, program, and/or service under consideration, and the resources available. Efforts to involve minority and LEP populations in public participation activities may include both comprehensive measures, such as placing public notices in vehicles and program sites, 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.

SOME OF THOSE EFFECTIVE PUBLIC OUTREACH PRACTICES INCLUDE:

The Agency takes the following steps to ensure that minority, low-income, and LEP members of the community have meaningful access to public outreach and involvement activities, including those conducted as part of the planning process for proposed changes in services development.

1. Publishing public notices within local newspapers of general circulation and on the agency's website. Public notices are issued to:
 - a. announce Board Meetings
 - b. announce public hearings for the Area Plan/Budget
 - c. announce intent to apply for public transit funding from DRPT
2. Sending news releases to news media (newspapers, radio, television, web media) of general interest.
3. Sending public service announcements (PSAs) to news media of general interest.

4. Conducting in-person outreach upon request at public meetings, community-based organizations, human service organizations which assist low income and LEP persons, places of worship, service organization meetings, cultural centers, and other places and events that reach out to persons protected under Title VI.
5. Conducting public hearings at locations and meeting times that are accessible by public transportation.
6. Conducting periodic customer satisfaction surveys to clients who receive services.
7. Partnering with local organizations that serve low income and LEP persons such as The Regional Transportation Collaborative (RTC) and Aging Together, Inc.

The above activities are the responsibility of the Executive Director or designee. However, in order to accomplish the above-mentioned outreach activities it is necessary to know where to target Agency efforts. Following are figures 1, 2 and 3, which indicate where the targeted members (minority, low-income, and LEP) are located.

SEE APPENDIX E - Summary of Outreach Efforts

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

Plan for Serving Persons with Limited English Proficiency (LEP)

Introduction and Legal Basis

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

As required, the Agency developed a written LEP Plan (below). Using American Community Survey (ACS) Census data, the Agency has evaluated data to determine the extent of need for translation services of its vital documents and materials.

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

Assessment of Needs and Resources

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

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

The 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 (2018-2022)

Data from the U.S. Census Bureau's American Community Survey (ACS) were obtained through www.census.gov. The agency's service area includes 6,395 persons with Limited English Proficiency (those persons who indicated that they spoke English "less than very well," in the 2018-2022 ACS Census). This total number of Limited English Proficiency persons is 3.69% of the total population of the Agency's service area.

Information from the 2018-2022 ACS also provides more detail on the specific languages spoken by those who report that they speak English less than very well. Languages spoken at home by

those with LEP are presented in Table 1. These data indicate the extent to which translations into other language are needed to meet the needs of LEP persons.

Table 1: LEP Population in the Agency's Service Area

Rappahannock-Rapidan CSB Service Area			
Language	Number of LEP Population	Percent of Service Area Population Speaking Language	Percent of LEP Population Speaking Language
Spanish	4,899	2.82%	76.61%
French, Haitian, or Cajun	236	0.14%	3.69%
German or other West Germanic languages	55	0.03%	0.86%
Russian, Polish, or other Slavic languages	201	0.12%	3.14%
Other Indo-European languages	321	0.18%	5.02%
Korean	104	0.06%	1.63%
Chinese (incl. Mandarin, Cantonese)	78	0.04%	1.22%
Vietnamese	33	0.02%	0.52%
Tagalog	87	0.05%	1.36%
Other Asian and Pacific Island languages	143	0.08%	2.24%
Arabic	77	0.04%	1.20%
Other and unspecified languages	161	0.09%	2.52%
Total LEP Population	6,395	3.69%	
Total Service Area Population	173,524		

In our service area, Spanish speakers are the largest population of LEP (4,899). No other languages surpass over 5% or 1,000 persons in the LEP population. Figure 1 shows the percentage of LEP population by Census Block Group. There are large populations of LEP north of and in Fauquier and east of Culpeper.

Percent Limited English Proficiency by Census Block Groups

- 0 - 1.5
- 1.5 - 5
- Greater than 5
- County Boundaries

0 3 6 12 Miles

N

The Agency 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 the following channels:

- We 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 assess accurately the frequency of contact. To assist in language identification, we use a language identification flashcards based on those developed by the U.S. Census.

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

The Agency provides the following programs, activities and services: aging and disability resources and services including senior centers, home-delivered meals, housing, and adult day care (via subcontract). Behavioral health, developmental disability, and substance use disorders services are also provided, including clinical, day support, and residential treatment and supports. Standing order door-to-door transportation is provided to support most of these services; non-emergency medical demand-response transportation is also available by appointment through Modivcare, Inc.

Additionally, the Agency coordinates a regional volunteer transportation network.

Based on past experience serving and communicating with LEP persons, we learned that the following services/programs are currently of particular importance to LEP persons in the community:

- Emergency Services
- Access Services
- Children's Services

The Agency is multi-jurisdictional agency of local government providing multiple core services that are essential for all community members, including LEP persons.

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

Costs

The following language assistance measures are currently being provided by ECS:

- Contracts with interpreters
- Telephone interpretation services
- Document translation

For the most recent fiscal year, the agency has incurred \$3,000 in costs to provide these services. We anticipate that these activities and costs will increase as the demand increases.

Based on the analysis of demographic data and contact with community organizations and LEP persons, the Agency has determined that the primary resource ideally needed to provide meaningful access would be additional bilingual direct service staff. Additional compensation for these skills would also be ideal if funding were available.

Resources

The available budget that could be currently devoted to additional language assistance expenses is \$4,000. This amount is likely to increase over time.

In addition, in-kind assistance is available through two local hospitals which assist with interpretation/translation services for emergency mental health services delivered on site in the hospital emergency departments.

The Agency has some bilingual staff that can provide language assistance on an ad hoc basis. Several of the Agency's bilingual staff have participated in a training program to become Qualified Bilingual Staff to provide effective communication and quality care to the limited-English proficient (LEP) individuals we serve.

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:

- Contracts with interpreters
- Telephone interpretation services
- Document translation

LEP Implementation Plan

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

- Translation of vital documents into Spanish
- Attempt to hire bilingual staff with competency in spoken and written Spanish
- Telephone interpretation services

Staff Access to Language Assistance Services

Agency staff who come into contact with LEP persons can access language services by having a supply of translated documents on hand, transferring a call to bilingual staff, using language interpretation line ([see attachment I](#)) and/or following the attached guidelines:

[Attachment G – Guidelines for Arranging Interpreter Services](#)

[Attachment H – Interpreter Request](#)

[Attachment I – Worldwide Interpreters Telephone Procedures](#)

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: transferring the call to bilingual staff or using the language interpretation line.

Responding to Written Communications from LEP Persons

The following procedures are followed when responding to written communications from LEP persons: contacting a bilingual staff to translate the communication orally and in writing, and if necessary, using the bilingual staff to translate the written response.

Responding to LEP Individuals in Person

The following procedures are followed when an LEP person visits our customer service and administrative office: use language identification flashcard if needed, contact a bilingual staff to interpret and/or find out need of LEP person, use of language interpretation line.

The following procedures are followed by operators when an LEP person has a question on board an Agency vehicle: use of language identification flashcard if needed, contact dispatcher to speak with bilingual staff for interpretation purposes, referral to telephone assistance.

Staff Training

As noted previously, all 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 Agency's responsibilities;
- 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 competency practices.

Also, all staff who routinely come into contact with clients, as well as their supervisors and all management staff, receive annual refresher training on procedures related to assisting LEP persons.

All staff receive cultural competency training when first hired and then annually. This training is on an e-learning platform.

Providing Notice to LEP Persons

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

- Title VI policy statement included on our vital documents.
- Title VI policy statement on our website, with links to translations in other languages.
- Title VI policy statement on signs posted on our vehicles and in our customer service and administrative offices.

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, the Agency will solicit feedback on the effectiveness of language assistance provided and unmet needs. In addition, we will conduct periodic surveys, focus groups, community meetings, and/or internal meetings with staff who assist LEP persons to assess the adequacy and quality of the language assistance provided; the Agency will determine if any changes are needed in responding to LEP needs.

In preparing the triennial update of this plan, the Agency 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."

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

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

X. MINORITY REPRESENTATION ON PLANNING AND ADVISORY BODIES

Title 49 CFR Section 21.5(b)(1)(vii) states that a recipient may not, on the grounds of race, color, or national origin, “deny a person the opportunity to participate as a member of a planning, advisory, or similar body which is an integral part of the program.”

The Agency has one transportation-related advisory council, namely, the Community Connections for Older Adults Advisory Council, the membership of which we select.

According to the Agency’s Advisory Council By-Laws, revised and implemented June 17, 2014, Article IV: Council Membership reads as follows:

ARTICLE IV: COUNCIL MEMBERSHIP

- (1) (a) The Council will consist of at least ten (10) and no more than twenty-five (25) members, with at least two (2) representatives from each county in Planning District Nine.
- (b) Per CFR 1321.57, the council membership shall include individuals and representatives of community organizations who will help enhance the leadership role of the area agency on aging in developing community based systems of services.
- (2) (a) Council membership shall include:
 - More than 50 percent older persons, including minority individuals who are participants or who are eligible to participate in programs under this part;
 - Representatives of older persons;
 - Representatives of health care provider organizations, including providers of veterans’ health care (if appropriate).
 - Representatives of supportive services providers organizations;
 - Persons with leadership experience in the private and voluntary sectors;
 - Local elected officials; and
 - The general public.

The area plan shall be submitted for review and comment to the advisory council before it is transmitted to DARS for approval.

- (b) The Executive Director, the Director of Community Connections for Older Adults, and the Volunteer and Aging Services Manager shall serve as ex-officio members of the Advisory Council. The Nutrition and Volunteer Services Manager and Support Coordination Supervisor shall serve as ex-officio members of the Advisory Council.
- (c) Prospective members will be nominated by council members, approved by the Executive Board, and then appointed to the Advisory Council.
- (3) (a) Members shall be appointed for an indefinite term and may serve until a successor is appointed.
- (b) Vacancies shall be filled according to the procedures for nomination and appointment set forth above.
- (d) Membership on the Council may be terminated if any member has three (3) consecutive unexcused absences.

- (e) All new council members will receive a full orientation, job description, to Agency programs within three months of their appointment. This orientation will be coordinated by the Council Vice President and will cover a review of programs and an overview of the role of the Advisory Council.
- (f) Council may appoint "honorary members" eligible to attend and advise Council meetings. Honorary members may not constitute part of the quorum for voting purposes or register votes.

**SEE APPENDIX F - TABLE MINORITY REPRESENTATION ON COMMITTEE BY
RACE**

XI. MONITORING TITLE VI COMPLAINTS

As part of the complaint handling procedure, the Title VI Manager investigates possible inequities in service delivery for the services about which the complaint was filed. In addition to the investigation following an individual complaint, the Title VI Manager periodically reviews all complaints received to determine if there may be a pattern. At a minimum, this review is conducted as part of preparing the Annual Report and Update for submission to the DRPT

APPENDIX A - TITLE VI NOTICE TO THE PUBLIC



English: Title VI Public Notice

If you believe you have been subjected to discrimination under Title VI of the Civil Rights Act of 1964, based on your race, color, or national origin, you may file a complaint up to 180 days from the date of the alleged discrimination.

The complaint should include the following information:

- **Your name, address, and how to contact you (i.e., telephone number, email address, etc.)**
- **How, when, where, and why you believe you were discriminated against.**
- **The location, names and contact information of any witnesses.**

The complaint may be filed in writing to: Human Resources Manager, 15361 Bradford Road, P. O. Box 1568, Culpeper, VA 22701

Español: Notificación Pública del Título VI

Si cree que ha sido discriminado por su raza, color u origen bajo el Título VI de la Ley de Derechos Civiles de 1964, usted puede poner una queja hasta 180 días desde la fecha de la presunta discriminación.

La queja debe incluir la siguiente información:

- **Su nombre, su dirección, y formas de contacto (número de teléfono, dirección electrónica, etc.)**
- **Cómo, cuándo, dónde y por qué cree que discriminaron contra usted.**
- **Los nombres y los datos de testigos.**

La queja puede ser presentada por escrito al: Gerente de Recursos Humanos, 15361 Bradford Road, P. O. Box 1568, Culpeper, VA 22701

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

Title VI Notice to the Public are Posted in the following Locations

1. Behavioral Healthcare Clinics (2)
2. Bradford Road Administrative Building
3. Boxwood Recovery Center
4. Crisis Intervention Team Program
5. Developmental Disability Day Program
6. Developmental Disability Group Homes (8)
7. Infant Toddler Connection
8. Mental Health Children's Program – Support Coordination
9. Mental Health Support Coordination - Adults
10. Mental Health Transitional Housings (2)
11. Senior Centers (5)
12. Transit fleet
13. VHDA Section 8 Housing Apartments Main Office
14. S. E. E. Recovery Center

APPENDIX C - TITLE VI COMPLAINT FORM
ENGLISH VERSION



encompass
— Community Supports —

Discrimination Complaint Form

The purpose of this form is to assist you in filing a complaint with the RRCS Human Resources Office. You are not required to use this form; a letter with the same information is sufficient. However, the information requested in the items marked with a star (*) must be provided, whether or not this form is used.

1.* State your name and address.

Name: _____

Address: _____

Zip: _____

Telephone: Home: (_____) _____ Work or Cell: (_____) _____

2.* Person(s) discriminated against, if different from above:

Name: _____

Address: _____

Zip: _____

Telephone: Home: (_____) _____ Work or Cell: (_____) _____

Please explain your relationship to this person(s): _____

3.* Individual, department or program that discriminated:

Name: _____

Address: _____

Zip: _____

Telephone: _____

4A.* Non-employment: Does your complaint concern discrimination in the delivery of services or in other discriminatory actions of an individual, department or program in their treatment of you or others? _____

If so, please indicate below the base(s) on which you believe these discriminatory actions were taken.

<input type="checkbox"/>	Race/Ethnicity: _____
<input type="checkbox"/>	National origin: _____
<input type="checkbox"/>	Sex: _____
<input type="checkbox"/>	Religion: _____
<input type="checkbox"/>	Age: _____
<input type="checkbox"/>	Disability: _____
<input type="checkbox"/>	Other: _____

4B.* Employment: Does your complaint concern discrimination in employment by the agency? If so, please indicate below the base(s) on which you believe these discriminatory actions were taken.

	Race/Ethnicity: _____
	National origin: _____
	Sex: _____
	Religion: _____
	Age: _____
	Disability: _____
	Other: _____

5. What is the most convenient time and place for us to contact you about this complaint? _____

6. If we will not be able to reach you directly, you may wish to give us the name and phone number of a person who can tell us how to reach you and/or provide information about your complaint:

Name: _____
Telephone: Home: (____) _____ Work or Cell: (____) _____

7. If you have an attorney representing you concerning the matters raised in this complaint, please provide the following:

Name: _____
Address: _____
Zip: _____
Telephone: Home: (____) _____ Work or Cell: (____) _____

8.* To your best recollection, on what date(s) did the alleged discrimination take place?

Earliest date of discrimination: _____
Most recent date of discrimination: _____

9. Complaints of discrimination must generally be filed within 180 days of the alleged discrimination. If the most recent date of discrimination, listed above, is more than 180 days ago, you may request a waiver of the filing requirement. If you wish to request a waiver, please explain why you waited until now to file your complaint. _____

10.* Please explain as clearly as possible what happened, why you believe it happened, and how you were discriminated against. Indicate who was involved. Be sure to include how other persons were treated differently from you. (Please use additional sheets if necessary and attach a copy of written materials pertaining to your case.) _____

11. The laws we enforce prohibit the intimidation or retaliation against anyone because he or she has either taken action or participated in action to secure rights protected by these laws. If you believe that you have been retaliated against (separate from the discrimination alleged in #10), please explain the circumstances below. Be sure to explain what actions you took which you believe were the basis for the alleged retaliation.

12. Please list below any persons (witnesses, fellow employees, supervisors, or others), if known, whom we may contact for additional information to support or clarify your complaint.

Name	Address	Area Code/Telephone

13. Do you have any other information that you think is relevant to our investigation of your allegations? _____

14. What remedy are you seeking for the alleged discrimination? _____

15. Have you filed or do you intend to file a charge or complaint concerning the matters raised in this complaint with any of the following?

- ☐ U.S. Equal Employment Opportunity Commission
- ☐ Federal or State Court
- ☐ Your State or local Human Relations/Rights Commission
- ☐ Grievance or complaint office
- ☐ Other

16. If you have already filed a charge or complaint with an agency indicated in #15, above, please provide the following information (attach additional pages if necessary):

Agency: _____

Date filed: _____

Case or Docket Number: _____

Date of Trial/Hearing: _____

Location of Agency/Court: _____

Name of Investigator: _____
Status of Case: _____
Comments: _____

- 17.* We cannot accept a complaint if it has not been signed. Please sign and date this Complaint Form below.

(Signature) (Date)

Please feel free to add additional sheets to explain the present situation to us. We will need your consent to disclose your name, if necessary, in the course of any investigation. Therefore, we will need a signed Consent Form from you. (If you are filing this complaint for a person whom you allege has been discriminated against, we will in most instances need a signed Consent Form from that person.) Please mail the completed, signed Discrimination Complaint Form and the signed Consent Form (please make one copy of each for your records) to:

Human Resources Manager
Rappahannock Rapidan Community Services
15361 Bradford Road
P.O. Box 1568
Culpeper, VA 22701
(540) 825-3100

18. How did you learn that you could file this complaint? _____

APPENDIX C - TITLE VI COMPLAINT FORM
SPANISH VERSION



Formulario de Denuncia de Discriminación

El propósito de este formulario es ayudarlo(a) en la presentación de una denuncia ante la Oficina de Recursos Humanos de RRCS. No es necesario que utilice este formulario; es suficiente una carta que contenga la misma información. Sin embargo, se debe proporcionar la información que se solicita en las secciones marcadas con un asterisco (*), utilice o no este formulario.

1.* Escriba su nombre y dirección.

Nombre: _____

Dirección: _____

Código postal: _____

Teléfono: Casa: (____) _____ Trabajo o celular: (____) _____

2.* Persona(s) discriminada(s), si no es usted:

Nombre: _____

Dirección: _____

Código postal: _____

Teléfono: Casa: (____) _____ Trabajo o celular: (____) _____

Explique su relación con esta(s) persona(s): _____

3.* Individuo, departamento o programa causante de la discriminación:

Nombre: _____

Dirección: _____

Código postal: _____

Teléfono: _____

4A.* Denuncia no relacionada con empleo: ¿Su denuncia es por discriminación en la prestación de servicios o por otras acciones discriminatorias por parte de un individuo, departamento o programa en relación con el trato hacia usted u otras personas? _____

Si es así, indique a continuación la(s) razón(es) por la(s) que considera que se tomaron estas acciones discriminatorias.

<input type="checkbox"/>	Raza / origen étnico: _____
<input type="checkbox"/>	Origen nacional: _____
<input type="checkbox"/>	Sexo: _____
<input type="checkbox"/>	Religión: _____
<input type="checkbox"/>	Edad: _____
<input type="checkbox"/>	Discapacidad: _____
<input type="checkbox"/>	Otro: _____

4B.* Empleo: ¿Su denuncia es por discriminación en el empleo por parte de la agencia? Si es así, indique a continuación la(s) razón(es) por la(s) que considera que se tomaron estas acciones discriminatorias.

	Raza / origen étnico: _____
	Origen nacional: _____
	Sexo: _____
	Religión: _____
	Edad: _____
	Discapacidad: _____
	Otro: _____

5. ¿Cuál es la hora y el lugar más conveniente para que nos pongamos en contacto con usted en relación con esta denuncia?

6. Si no podemos ponernos en contacto con usted directamente, posiblemente quiera darnos el nombre y número de teléfono de una persona que nos pueda indicar cómo hacerlo y/o proporcionar información sobre su denuncia:

Nombre: _____

Teléfono: Casa: (_____) _____ Trabajo o celular: (_____) _____

7. Si tiene un abogado que lo representa para los asuntos planteados en esta denuncia, proporcione los siguientes datos:

Nombre: _____

Dirección: _____

Código postal: _____

Teléfono: Casa: (_____) _____ Trabajo o celular: (_____) _____

8.* Si lo recuerda, ¿cuándo ocurrió la presunta discriminación?

Fecha del primer incidente de discriminación: _____

Fecha del incidente de discriminación más reciente: _____

9. Las denuncias por discriminación deben presentarse, por lo general, en un periodo de 180 días a partir de la presunta discriminación. Si el incidente de discriminación más reciente, que se menciona anteriormente, ocurrió hace más de 180 días, puede solicitar una exención de la solicitud de presentación. Si desea solicitar dicha exención, explique la razón por la que esperó hasta ahora para presentar su denuncia. _____

escritos pertinentes a su caso.) _____

para la(s) presunta(s) represalia(s). _____

12. Por favor indique abajo las personas (testigos, compañeros de trabajo, supervisores u otros) que podemos contactar para obtener información adicional para apoyar o aclarar su denuncia.

Nombre	Dirección	Código de área /teléfono

13. ¿Tiene alguna información adicional que considere pertinente para nuestra investigación sobre su(s) denuncia(s)?

14. ¿Qué solución busca por la presunta discriminación?

15. ¿Ha presentado o tiene la intención de presentar un cargo o una denuncia con respecto a los asuntos planteados en este caso, con alguna de las siguientes autoridades?

- ☐ Comisión para la Igualdad de Oportunidades de Empleo de EE. UU.
- ☐ Tribunal federal o estatal
- ☐ Comisión estatal o local sobre relaciones / derechos humanos
- ☐ Oficina de quejas
- ☐ Otra agencia

16. Si ha presentado un cargo o una denuncia ante una de las agencias indicadas en el punto 15, proporcione la siguiente información (adjunte páginas adicionales si es necesario):

Agencia: _____

Fecha Presentada: _____

Número de caso o expediente: _____

Fecha de juicio / audiencia: _____

Dirección de la agencia /tribunal: _____
Nombre del investigador: _____
Estado del caso: _____
Comentarios: _____

- 17.* No podemos aceptar una denuncia que no esté firmada. Por favor firme y ponga la fecha a este Formulario de Denuncia de Discriminación.

(Firma)

(Fecha)

Por favor, no dude en agregar hojas adicionales para explicarnos la situación actual. Necesitaremos su consentimiento para divulgar su nombre, si fuera necesario, en el transcurso de cualquier investigación. Por lo tanto, necesitaremos que usted firme un Formulario de Consentimiento. (Si está presentando esta denuncia en nombre de una persona que usted alega ha sido discriminada, necesitaremos el formulario de consentimiento firmado por esa persona.) Por favor llene, firme y envíe por correo el Formulario de Denuncia de Discriminación y el Formulario de Consentimiento firmado a la siguiente dirección. (Por favor haga una copia de cada uno de estos documentos para sus archivos.)

Gerente de Recursos Humanos
Rappahannock Rapidan Community Services
15361 Bradford Road
P.O. Box 1568
Culpeper, VA 22701
(540) 825-3100

18. ¿Cómo supo que podía presentar esta denuncia? _____

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

List of Investigations, Lawsuits and Complaints

	Date (Month, Day, Year)	Summary (include basis of complaint: race, color or national origin)	Status	Action(s) taken
Investigations	n/a			
1.				
2.				
Lawsuits	n/a			
1.				
2.				
Complaints	n/a			
1.				
2.				

APPENDIX E - SUMMARY OF OUTREACH EFFORTS

Outreach Efforts

1. Annual public notices for the Agency's FTA Section 5310 grant applications on newspapers covering each of the five counties we serve.
2. Public notices announced on the Agency's website.
3. Submitted various news releases to news media.
4. Annual public hearings for Agency Budget and Area Plan.
5. Conducted annual satisfaction surveys related to Nutrition and Transportation services.
6. Partnered with the Regional Transportation Collaborative (RTC) to implement the coordinated human services mobility plan (CHSMP) to provide transportation resources to underserved populations.

**APPENDIX F – MINORITY REPRESENTATION ON COMMITTEE BY
RACE TABLE**

MINORITY REPRESENTATION ON COMMITTEE BY RACE

Committee	Black or African American	White or Caucasian	Latino/ Hispanic	American Indian or Alaska Native	Asian	Native Hawaiian or Other Pacific Islander	Other*	Total
Aging Services Advisory Council		13						13
% of		100%						100 %

**APPENDIX G – AGENCY GUIDELINES FOR ARRANGING
INTERPRETER SERVICES**

Guidelines for Arranging Interpreter Services

9/9/11

Overview

The Agency contracts with several individuals to provide interpreter services for our clients. Follow these guidelines when you need an interpreter to assist you during a client meeting, assessment or during the provision of agency services.

Interpreter services must be authorized and arranged before they can begin. Notify your supervisor and division director as soon as you identify a need for an interpreter. A week or more is ideal -this gives us enough time to make arrangements and lowers the cost to your program.

Consumers are not charged for interpreter services -the agency pays for this accommodation.

Steps

If you have an immediate need for an interpreter (e.g., an unexpected phone call or a person walks in to a program site) use the "Immediate Need/Other Languages" vendor list. Then follow the steps below to inform your supervisor and send an invoice for the service.

At intake (or prior to the delivery of services) when you've identified a need for an interpreter...

1. Inform both your supervisor and your Division Director of the need for interpreter services, using form #98 Interpreter Request & Approval Form.
- ** Please get as much information about the person's language, dialect and accommodation needs so we can secure the right type of interpreter. For example, does the person speak Cantonese or Mandarin Chinese? Does the person have a combined loss of vision and hearing (Deaf/Blind)?
2. Once approved, supervisory staff should make arrangements to obtain the interpreter. Interpreter resources- including contractor's names/contact information is available on the agency's intranet page.
3. Staff should keep their supervisor, Division Director and Procurement informed about the client's ongoing need for services so the interpreter services can continue or end.
4. Once the interpreter service is rendered, supervisors should complete form #98A Interpreter Invoice and send it and form #98 Interpreter Request & Approval Form to Accounts Payable.

Referrals to Other Agency Programs

Information about a client's need for interpretive services should be included in referral documentation sent to other agency programs. The primary staff member should collaborate

with Procurement and the other programs to ensure the continuity of interpreter services.

Documents in Other Formats

Client Orientation Handbook (form #525) is available in Spanish and a large print edition. Other Agency publications are available in other formats on request. Contact Valerie Sparks, Quality Analyst, at 540.825.3100 x3442 for more information.

Authorizations - (Form #504 Release or Information/Authorization for Disclosing or Using PHI)

- Interpreters hired by Agency are contractual employees of our agency, so the client does not need to sign an authorization. These contractors sign a confidentiality agreement prior to their start.
- Interpreters provided by another agency (DSS, jail, Social Security, etc.). If we already have an authorization (Form #504) to that agency, we do not need to have a separate authorization for the interpreter. We should ensure the interpreter understands that the proceedings are confidential, though.
- Interpreters brought by the client (e.g., family member or friend). If a client brings his/her own interpreter to a session/meeting, the client should sign our authorization form #504 to document that we have permission to share info with the person during the session(s).
- Using a client's family or friends is not ideal for therapy or ongoing services like day support. Discuss these situations with your supervisor for guidance.

APPENDIX H – INTERPRETER REQUEST

Request and Approval for Interpreter Services

Date(s) Service to be scheduled _____

Begin/End Time for Interpreter Services Start _____ End _____

Is this a one time or ongoing need for interpreter services? One Time Ongoing

Name of Interpreter Scheduled _____

Interpreter Phone # _____

Rate per hour \$ _____

Travel rate (for Sign Language Interpreters Only) \$ _____

Program Requesting Interpreter _____
(e.g., Outpatient, Emergency Services, ITC, etc.)

Location Needed _____

Client Name & Number _____ # _____

Has Reimbursement verified that this individual's insurance will not cover interpreter services?

Yes No

Justification for Interpreter/ Other information

Staff Member Requesting Interpreter _____

Staff Signature

Date

Please send to one of the following supervisors to obtain approval for language interpreter services:

- * Director of Clinical Services
- * Director of Aging & Transportation Services
- * Director of Community Support Services
- * Reimbursement Manager

Approval Signature

Date

APPENDIX I – WORLDWIDE INTERPRETERS TELEPHONE PROCEDURES



Rappahannock-Rapidan Community Services Board dba Encompass Community Supports herein called ("Agency").

Other Languages or Immediate Need for Translation Services

WORLD WIDE INTERPRETERS
Vendor #308799

866-478-1811 phone

Telephone Interpretation: \$.70 per minute -Spanish \$.85 per minute - All Other Languages

Program Code Numbers (PIN Number)

If your program isn't listed, contact Procurement to get a code assigned.

Program	Enter Password as PIN# below with # at end.
ITC	39505
Crisis Services	70968
Clinical – Culpeper	87528
Clinical – Fauquier	62282
Children's Behavioral Support	81562
VICAP	39729
Aging	26688
Young Adult Coordinated Care	68611
Front Desk – Culpeper	37690
Front Desk – Fauquier	17068
Community Support	56051
Boxwood	30587
Bradford Road – Front Desk	95804

Instructions

- Dial number, punch in PIN number (program code #) and follow prompts:
1 – Spanish 2 - all other languages.
 - Services can be accomplished by conference call or using your speaker phone, if the person is in an Agency office. If not using a speakerphone, let the interpreter know you're passing the phone back and forth.
 - Give the interpreter the Agency name, your name and the name of the person who needs the translation services.
 - Use short phrases; pause to allow for the interpretation.
 - Ask one question at a time.
 - Use simple language to express your meaning. Remember: slang doesn't translate.
 - Explain complex terms when necessary.
 - Don't say anything you don't want interpreted.
 - Allow the interpreter to stop you and seek an explanation when necessary.
 - Allow the interpreter to repeat back any critical information that may need more clarity.
- Languages used less frequently in Virginia may take a few minutes to connect.
 - Written translation services are available – Discuss with Procurement first.
 - Follow Agency guidelines for arranging interpreters. Unless this is an emergency need, get your supervisor's approval first.

These are some of the languages that are readily available – these are the 25 most frequently spoken languages in Virginia. Other languages are available, but may take more time to access.

Amharic	Farsi/Persian	Hindi	Portuguese	Spanish
Arabic	French	Italian	Punjabi	Tagalog
Bengali	German	Japanese	Polish	Thai
Chinese – Cantonese	Gujarati	Khmer/Cambodian	Russian	Urdu
Chinese – Mandarin	Greek	Korean	Somali	Vietnamese