

Title VI Plan 2018-2020

Capitol Hill Village

Implementation Guide

Adopted June 13, 2018

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I. INTRODUCTION

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that "no person in the United States shall, on the grounds 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.

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

Recipients of public transportation funding from FTA and the Metropolitan Washington Council of Governments ("COG") are required to develop policies, programs, and practices that ensure federal transit dollars are used in a manner that is nondiscriminatory as required under Title VI.

This document details how Capitol Hill Village incorporates nondiscrimination policies and practices in providing services to the public.

II. OVERVIEW OF SERVICES

MISSION: Build a community that supports seniors aging on their own terms. This includes ensuring accessible and safe physical spaces; supporting seniors with services that enhance their quality of life and ensure wellness; and fostering a community that is learning about longevity and its impact on individuals, families, and institutions.

GOALS

1. Ensure that seniors are socially engaged with persons outside their home.
2. Create and implement a range of learning opportunities for seniors about longevity, wellness, current affairs and technology.
3. Provide volunteer services to seniors that help them age on their own terms and demonstrate they are valued in the community.
4. Provide care services to seniors to support them and their families to stay well and live a quality life.
5. Engage seniors to be civic members through volunteerism, activism, and/or serving on advisory committees.

PROGRAM AREAS

A) **Social Programs:** CHV conducts social and wellness programs daily, averaging over 500 events a year. These include walking groups, bocce teams (ranked in the U.S!), Tai Chi and Qi Gong, poetry groups, book clubs, movie groups, and more.

B) **Educational Programs:** CHV conducts over 60 educational programs a year. Our programs fall into four general categories: health and wellness, technology, current events, and community design symposia.

C) **Volunteerism:** We offer volunteer services for seniors to help them live independently. Examples include providing rides to the doctor, raking leaves, and changing light bulbs and smoke detector batteries. We also have a Village Connections program, which matches volunteers with frail seniors. We also connect seniors to opportunities that fit their interests. We have seniors who serve on boards of directors, volunteer at preschools and elementary schools and work in other non-profits. The objective is two-fold: first, seniors stay active and have a sense of purpose; second, community members of all ages interact with seniors, understand their skills and learn about longevity.

D) **Care Services.** CHV has a Care Services Team that coordinates care for frail members, such as those who need assistance living at home. The Care Service Team also helps seniors who are in transition, such as those changing housing, being released from the hospital, or recovering from a recent loss. Team members also facilitate family conversations among adult children and their parents. The

E) **Advocacy:** CHV's Advocacy Corps has 49 members who, in 2017, attended 42 community meetings, had 13 meetings with DC City Council members and agency staff, and testified 17 DC Council oversight and budget hearings.

Transportation Services: CHV and other DC Villages provide over 2000 rides by volunteers each year to seniors. Additionally, the DC Villages conduct education and peer-to-peer support around a range of mobility issues such as using public transit, getting connected to para-transit, Seabury Connector and other related transportation options. Our goals around transportation are for seniors to be mobile across the city in a safe and efficient way through a number of possible paths. We are work to ensure that seniors are safe walkers, bikers, drivers and metro users and that larger city systems understand and work to accommodate senior needs.

III. POLICY STATEMENT AND AUTHORITIES

Title VI Policy Statement

Capitol Hill Village 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.

Capitol Hill Village's Title VI Manager is responsible for initiating and monitoring Title VI activities, preparing required reports, and other responsibilities as required by Title 23 Code of Federal Regulations ("CFR") Part 200, and Title 49 CFR Part 21.



Signature of Authorizing Official

June 13, 2018

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, national origin, or sex, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving federal financial assistance (refer to 49 CFR Part 21). The Civil Rights Restoration Act of 1987 broadened the scope of Title VI coverage by expanding the definition of the terms "programs or activities" to include all programs or activities of Federal Aid recipients, sub recipients, and contractors, whether such programs and activities are federally assisted or not.

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

IV. NONDISCRIMINATION ASSURANCES TO COG

In accordance with 49 CFR Section 21.7(a), every application for financial assistance from 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 COG submits its annual certifications and assurances to FTA. COG shall collect Title VI assurances from sub recipients prior to passing through FTA funds.

As part of the Certifications and Assurances submitted to COG at the time of grant application and award, Capitol Hill Village submits a Nondiscrimination Assurance which addresses compliance with Title VI as well as nondiscrimination in hiring ("EEO") and contracting ("DBE"), and nondiscrimination because of a disability ("ADA").

In signing and submitting the assurance, Capitol Hill Village confirms to COG our commitment to nondiscrimination and compliance with federal and state requirements.

V. PLAN APPROVAL DOCUMENT

I hereby acknowledge the receipt of the Capitol Hill Village Title VI Implementation Plan 2018-2021 I have reviewed and approve the Plan. I am committed to ensuring that no person is excluded from participation in, or denied the benefits of Capitol Hill Village transportation services on the basis of race, color, or national origin, as protected by Title VI according to FTA Circular 4702.1B, Title VI requirements and guidelines for Federal Transit Administration sub-recipients.



Phil Guire

Capitol Hill Village Board President

See addendum of Meeting Minutes reflecting Board Approval of the Plan in Appendix G

11/8/2018

Date

VI. ORGANIZATION AND TITLE VI PROGRAM RESPONSIBILITIES

Under the authority of Capitol Hill Village, The Capitol Hill Village Executive Director and/or Office Manager will serve as the Title VI Manager and be responsible for ensuring implementation of the agency's Title VI program. The specific areas of responsibility are described below.

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.

Title VI Manager Responsibilities

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 data when possible (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.
4. Conduct training programs on Title VI and other related statutes for agency employees.
5. Prepare a yearly report of Title VI accomplishments and goals, as required.
6. Develop Title VI information for dissemination to the general public.
7. Identify and eliminate discrimination within programs at Capitol Hill Village.
8. Establish procedures for promptly resolving deficiency status and writing the remedial action necessary, all within a period not to exceed 90 days.

The Title VI Manager is responsible for ensuring the aforementioned 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, Capitol Hill Village will maintain:

- A website posting of CHV's Title VI policy, requirements and expectations
- A log that tracks the investigation of and response to each complaint of Title VI complaint received.
- A log of the public outreach and involvement activities undertaken to ensure that minority and low-income people have meaningful access to the activities, memberships and employment opportunities.

2. Annual Report and Updates

As a subrecipient of FTA funds, Capitol Hill Village is required to submit a log, as part of its Quarterly Report to COG, that documents any Title VI complaints received during the preceding quarter and for each year. Capitol Hill Village will also maintain and provide to COG, on an annual basis, the log of public outreach and involvement activities undertaken to ensure that minority and low-income individuals have meaningful access to these activities, memberships and employment opportunities.

Furthermore, Capitol Hill Village will submit to COG updates to any of the following items subsequent to its previous submission, or a statement to the effect that these items have not been changed since the previous submission:

- A copy of any compliance review report for reviews conducted in the last three (3) 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; and
- A copy of the agency’s 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 the Title VI Manager will review the agency’s Title VI program to ensure 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 Capitol Hill Village’s Title VI program will be disseminated to agency employees, contractors, and beneficiaries, as well as to the public, as described in the “public outreach and involvement” section of this document and according to federal and state laws/regulations. The Title VI program will be available in other languages when needed according to the LEP plan.

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. Capitol Hill Village will report the complaint to COG within three (3) business days (per COG 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 to COG in the Quarterly Report (in addition to immediately).

6. Written policies and procedures

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

7. Internal Education

Capitol Hill Village’s employees will receive training on Title VI policies and procedures upon hiring. This training will include requirements of Title VI, Capitol Hill Village’s obligations under Title VI, 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 policies will be a part of the Personnel Manual and be posted in a public space. Title VI training is the responsibility of Executive Director or Office Manager.

8. Title VI clauses in contracts

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

VII. GENERAL REPORTING REQUIREMENTS

1. TITLE VI NOTICE TO THE PUBLIC

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

Capitol Hill Village is committed to ensuring that no person is excluded from participation in or denied the benefits of its 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 need further information or feel you are being denied participation in or being denied benefits provided by Capitol Hill Village, or otherwise being discriminated against because of your race, color, national origin, gender, age, or disability, please contact:

Molly Singer, Executive Director Capitol Hill Village (202) 543 1778	725 8th St SE Washington DC 20003 msinger@capitolhillvillage.org
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As part of Title VI requirements, sub-recipients are also required to maintain a list of locations where their Title VI Notices have been posted or displayed.

Capitol Hill Village's TITLE VI NOTICE TO THE PUBLIC; LIST OF LOCALES is APPENDIX A.

2. TITLE VI COMPLAINT PROCEDURES

Any individual may exercise his or her right to file a complaint with Capitol Hill Village if that person believes that he or she have been subjected to unequal treatment or discrimination in the receipt of benefits or services. We will report the complaint to Metropolitan Washington Council of Governments (COG) within three (3) business days (per COG requirements), and make a concerted effort to resolve complaints locally, using Capitol Hill Village's Nondiscrimination Complaint Procedures. All Title VI complaints and their resolution will be logged and reported to COG in the Quarterly Report (in addition to immediately).

A person may also file a complaint directly with the Federal Transit Administration, Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th floor – TCR, 1200 New Jersey Avenue SE, Washington, DC 20590. Capitol Hill Village includes the following language on its website and posted within its office. The language is also included in the Personnel manual.

Capitol Hill Village is committed to ensuring that no person is excluded from participation in, or denied the benefits of its programs or services on the basis of race, color or national origin, as protected by Title VI in the Federal Transit Administration (FTA) Circular 4702.1B. For additional information Capitol Hill Village's nondiscrimination policies and procedures, or to file a complaint, please visit the website at contact (name, title and mailing address of the Title VI Manager). Instructions for filing Title VI complaints are posted on the Capitol Hill Village's website and on signs in the office.

3. TITLE VI COMPLAINT FORM.

Capitol Hill Village's TITLE VI COMPLAINT FORM and instructions are attached as APPENDIX B.

4. FOLLOW UP and REPORTING TITLE VI INVESTIGATIONS, COMPLAINTS OR LAWSUITS

Should any Title VI investigations be initiated by FTA or COG, or if any Title VI lawsuits are filed against Capitol Hill Village, we 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.
 - a. A formal complaint must be filed within 180 calendar days of the alleged occurrence.
 - b. The complaint should include:

<ul style="list-style-type: none">• Complainant's name, address, and contact information (i.e., telephone number, email address, etc.);• 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;	<ul style="list-style-type: none">• 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 COG or FTA?).
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2. The complaint is to be filed in the following manner:
 - a. The complaint shall be submitted to the Title VI Manager at Capitol Hill Village and/or email msinger@capitolhillvillage and/or president@capitolhillvillage.org
 - b. 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
 - Upon receipt of the complaint, the Title VI Manager will immediately: a) notify COG (no later than three (3) business days from receipt); b. notify Capitol Hill Village Authorizing Official; and c. ensure that the complaint is entered in the complaint database.
 - 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.
3. 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.
4. If COG has assigned staff to assist with the investigation, the Title VI Manager will offer an opportunity to participate in the interview.
5. The alleged discriminatory service or program official will be given the opportunity to respond to all aspects of the complainant's allegations.
6. The Title VI Manager will determine, based on relevancy or duplication of evidence, which witnesses will be contacted and questioned.
7. The investigation may also include:
 - a. investigating contractor operating records, policies or procedures; b. reviewing routes, schedules, and fare policies;
 - b. reviewing operating policies and procedures;
 - c. reviewing scheduling and dispatch records; and
 - d. observing behavior of the individual whose actions were cited in the complaint.

8. All steps taken and findings in the investigation will be documented in writing and included in the complaint file.
9. 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.
10. At the conclusion of the investigation and within 60 days of the interview with the complainant, the Title VI Manager shall 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, COG, and if appropriate our legal counsel.
11. 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 COG in the event the complainant wishes to appeal the determination. This letter will be copied to COG.
12. 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; and
 - c. The complainant fails to respond to repeated requests for additional information needed to process the complaint.

Reporting -- TITLE VI COMPLAINTS, INVESTIGATIONS & LAWSUITS

For any Title VI incident through Capitol Hill Village complainants shall complete the complaint form and CHV shall follow up according to its policy. Additionally, Capitol Hill Village will prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, or national origin:

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

This list shall include the date that the transportation-related Title VI complaint, investigation, or lawsuit 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. Capitol Hill Village shall include this information in the Title VI Program submitted to COG every three years (3) and new information regarding complaints, lawsuits, or investigations shall be provided to COG with the Quarterly Report.

A copy of Capitol Hill Village's TRANSPORTATION RELATED COMPLAINTS REPORT is attached as APPENDIX C.

5. PUBLIC OUTREACH AND INVOLVEMENT - Public Participation Plan

Capitol Hill Village does not provide fixed route public transit. Nevertheless, we conduct outreach to disadvantaged communities.

This Public Participation Plan ("PPP") is a guide for ongoing public participation endeavors. Its purpose is to ensure that Capitol Hill Village (CHV) 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.

Capitol Hill Village established a public participation plan or process to determine how, when, and how often specific public participation activities should take place, and which specific measures are most appropriate.

Given the scope of CHV's programs and services, categories for which Capitol Hill Village considers supplemental tools and resources necessary include:

- Language translation
- Accessibility
- Inclusivity
- Audio and visual enhancements
- Programmatic contents

Public Participation Strategies

CHV works to incorporate equity and access into all of its programs. Tactics that we use to do that include a range of practices such as:

General Operational Strategies: Determining and identifying what meetings and program activities lend themselves to client public participation. Scheduling meetings at times and locations that are convenient and accessible for minority and LEFO communities. This includes repeating meetings and varying size, formats and scheduled times to attract a range of participants. Also, in instances where individuals cannot attend an event, we work to make sure that person is engaged through one-on-one or small peer groups so that they can participate and learn.

Language Translations: According to Statistical Atlas (www.statisticalatlas.com) over 94% of CHV's service area speaks English as a first language or speaks English "very well." Nevertheless: CHV has staff who are bi-lingual in Spanish and French and can serve as translators. CHV has access to a phone interpreter in many languages, as available through Trans Perfect Connect <http://www.transperfectconnect.com>. CHV can also arrange for documents to be transcribed through this service. In the event that an individual comes to our office without warning we can connect through them. As a very short-basis communication (as in to schedule a time or place or convey basic information – CHV uses Google Translate <https://translate.google.com>. At public events all individuals are encouraged to register ahead of time and identify their needs. With this information CHV can arrange for an interpreter as needed.

Accessibility: CHV makes every effort to ensure that its public programs are accessible for individuals with physical restrictions. Likewise, we work to ensure that all individuals have transportation. When activities are held in private homes we list the number of steps or other access barriers for individuals.

Inclusivity: CHV works to ensure inclusivity in three ways. First, we have direct partnerships with all range of organizations and networks. For example, we work with three separate low income senior housing communities and so we can share information through those networks. We also often host activities at those locations. We also post fliers and information on a range public bulletin boards, on listservs, in church bulletins and more. Our staff and board reflect the diverse population of our community.

Audio and Visual Enhancements: Many of CHV's clients are low vision and reduced hearing. To augment this we connect clients to a range of tools to compensate. For example, low vision members have readers where they can have documents read to them. Likewise we reserve seating and ensure safe spaces to accommodate low vision members. CHV can make large print documents upon request. CHV works with Gallaudet University's audiology department to create spaces that facilitate hearing through setting, tools of personal implements. For example, we have wireless microphones that direct to hearing aids. We can borrow wireless room loops that create stronger audio experience. And, most simply, we use a sound system and speakers.

Programmatic Content: CHV's program content is sensitive to many perspectives and experiences. Furthermore, we work to ensure that diverse experiences are accounted for and represented. In that same light, we work to make sure that materials are clear, easy to understand and that individuals with cognitive impairment or other issues have assistance in participating. Likewise we ensure a range of content, for example, we support the work of the DC Multi-modal accessibility advisory council by featuring its members and work at CHV events.

Partners: We do not know it all. CHV relies on our network and partners to help us ensure equity and access in all of our practices. For example, we are a part ACL Transit Planning for All Technical Expert Panel where we can engage with many efforts and learn from the practices of others.

- A sample of Capitol Hill Village's SUMMARY OF OUTREACH EFFORTS is APPENDIX D.

6. ACCESS FOR LIMITED ENGLISH PROFICIENT (LEP) PERSONS

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

Introduction and Legal Basis

LEP is a term that defines any individual not proficient in the use of the English language. The establishment and operation of an LEP program must meet the objectives set forth in Title VI of the Civil Rights Act and Executive Order 13116, Improving Access to Services for Persons with Limited English Proficiency (LEP). This Executive Order requires federal agencies receiving financial assistance to address the needs of non-English speaking persons. The Executive Order also establishes compliance standards to ensure that the programs and activities that are provided by a transportation provider in English are accessible to LEP communities. This includes providing meaningful access to individuals who are limited in their use of English. The following LEP language implementation plan, developed by Capitol Hill Village is based on FTA guidelines.

As required, Capitol Hill Village developed a written LEP Plan (below). Using 2010 and American Community Survey (ACS) Census data, Capitol Hill Village has evaluated data to determine the extent of need for translation services of its vital documents and materials.

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

Capitol Hill Village 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. According to Statistical Atlas (www.statisticalatlas.com) over 94% of CHV's service area speaks English as a first language or speaks English "very well."

Below is a table of most second languages among CHV's service area.¹

Language	% Speaking Language at Home
Spanish	7%
French	1.1 %
Chinese	.9%
African	.5%

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

Capitol Hill Village reviewed the relevant benefits, services, and information that it provides and determined the extent to which LEP persons have encountered these functions through the following channels:

- Members survey: all existing members who speak Spanish at home are also fluent in English.
- Calls to the office: There has been one call in 3 years and it was handled by a Spanish speaking staff member.
- Visits to the office: there have been no visits to the office by Spanish speaking individuals who do not speak English.
- Individuals attending ongoing event: there have been no Spanish speaking individuals who do not speak English attending CHV events in the past three years.

¹ <https://statisticalatlas.com/neighborhood/District-of-Columbia/Washington/Capitol-Hill/Languages>

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 accurately assess the frequency of contact.

CHV has access to a phone interpreter in many languages, as available through Trans Perfect Connect <http://www.transperfectconnect.com>. CHV can also arrange for documents to be transcribed through this service. In the event that an individual comes to our office without warning we can connect through them. As a very short-basic communication—as in to schedule a time or place or convey basic information – CHV uses Google Translate <https://translate.google.com>.

At public events all individuals are encouraged to register ahead of time and identify their needs. If someone needs a translator, CHV will identify and provide one. With this information CHV can arrange for an interpreter as needed. Additionally, CHV can provide Spanish speaking drivers for individuals who are not able to speak English well.

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

Capitol Hill Village provides the following programs, activities and services:

- Volunteer Driving to destinations: volunteers take seniors to appointments, social engagement, or to run errands.
- Pedestrian Information: CHV provides pedestrian safety and community walkabout workshops
- Metro and Bus Assistance: CHV provides materials and transportation buddies for public transportation assistance.
- Metro Access / Transport DC: CHV helps seniors connect to Metro Access and Transport DC
- General Awareness building and information sharing. CHV works with other villages and community organizations to create and share educational materials to increase seniors' mobility.

We have not conducted programming around preferred service routes with LEP persons.

The following are the most critical services provided by Capitol Hill Village for all customers, including LEP persons. (this section should be updated to reflect your agency's preferred language and procedures)

- Volunteer transit services
- Services focused on low income persons
- Metro Access / Transport DC: CHV helps seniors connect to Metro Access and Transport DC
- General Awareness building and information sharing. CHV works with other villages and community organizations to create and share educational materials to increase seniors' mobility.

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

The following language assistance measures are currently being provided by Capitol Hill Village

- CHV has access to a phone interpreter in many languages, as available through Trans Perfect Connect <http://www.transperfectconnect.com>. CHV can also arrange for documents to be transcribed through this service. In the event that an individual comes to our office without warning we can connect through them. As a very short-basic communication—as in to schedule a time or place or convey basic information – CHV uses Google Translate <https://translate.google.com>.
- At public events all individuals are encouraged to register ahead of time and identify their needs. If someone needs a translator, CHV will identify and provide one. With this information CHV can arrange for an interpreter as needed.
- Additionally, CHV can provide Spanish speaking drivers for individuals who are not able to speak English well.
- CHV has staff and volunteers who can translate verbally and printed materials as needed.

We anticipate that these activities and costs may increase as follows: We do not anticipate needing additional services, but if we did we anticipate an hourly cost of \$150 and a personnel cost of \$100 for each event for the time to plan and manage translation.

Based on the analysis of demographic data and contact with community organizations and LEP persons, Capitol Hill Village has determined that current services are adequate and additional services are not needed.

Resources: Capitol Hill Village has multi-lingual staff and volunteers and board members who can assist with language support to translate Spanish verbally or text.

Budget: Based on the analysis of demographic data and contact with community organizations and LEP persons, Capitol Hill Village has determined that additional services are not needed

Capitol Hill Village requests no additional grant funding for language assistance:

In addition, in-kind assistance may be available through volunteers and bilingual staff. Both volunteers and bilingual staff have worked as translators for organizations and are skills at and written translation. These are confirmed resources.

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:

- CHV has access to a phone interpreter in many languages, as available through Trans Perfect Connect <http://www.transperfectconnect.com>. CHV can also arrange for documents to be transcribed through this service. In the event that an individual comes to our office without warning we can connect through them. As a very short-basic communication—as in to schedule a time or place or convey basic information – CHV uses Google Translate <https://translate.google.com>.
- At public events all individuals are encouraged to register ahead of time and identify their needs. If someone needs a translator, CHV will identify and provide one. With this information CHV can arrange for an interpreter as needed.
- Additionally, CHV can provide Spanish speaking drivers for individuals who are not able to speak English well.
- CHV has staff and volunteers who can translate printed materials as needed.

LEP Implementation Plan

Through the four-factor analysis, Capitol Hill Village has determined no additional language assistance are needed.

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 Via Telephone: Staff who answer calls from the public respond to LEP customers as follows:

Staff transfer the call to one of two Spanish speakers in the office. If they are not present, staff use google translate to schedule a time for the person to call back when the Spanish speaker is in the office. Or, staff take the phone number of the person and have the staff member call them back ASAP. All staff members can

Lo siento, no hablo español. Si me puede decir su número de teléfono en inglés, le voy a hacer devolver su llamada por un colega que habla español. Gracias por su llamada. Por favor dime su nombre. Y . . . Por favor habla despacio.

Gracias por llamar y le devolveremos su llamada en breve.

Responding to Written Communications from LEP Persons

CHV has the ability to respond to written communications from persons writing in Spanish. And we could hire translators for other languages.

Responding to LEP Individuals in Person

The following procedures are followed an LEP person visits our offices:

- CHV has staff who a bi-lingual in Spanish and French and can serve as translators.
- CHV has access to a phone interpreter in many languages, as available through Trans Perfect Connect <http://www.transperfectconnect.com>. In the event that an individual comes to our office without warning and there are no Spanish-speaking staff, we can connect through them.
- As a very short-basis communication (as in to schedule a time or place or convey basic information – CHV uses Google Translate <https://translate.google.com>).

Drivers: The following procedures are followed by operators when an LEP person has a question on board a Capitol Hill Village vehicle:

- CHV has Spanish Speaking drivers who can answer questions and so if we have a Spanish speaker we would ensure a Spanish Speaking driver.
- In the event that an LEP person is riding with a person who does not speak the language, we will instruct and demonstrate how to use the google translate App on their smart phone.

Staff Training As noted previously, all Capitol Hill Village staff is provided with a list of available language assistance services and additional information and referral resources, updated annually.

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

- Review CHV's policies and practices, as outlined here regarding LEP.
- A summary of the number and proportion of LEP persons in Capitol Hill Village's activities to the population;
- A description of the type of language assistance that Capitol Hill Village is providing and instructions on how agency staff can access these products and services; and

Providing Notice to LEP Persons

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

- This statement is on our website. <http://capitolhillvillage.org/?pg=60>
Capitol Hill Village is dedicated to equity and access for all community members. If you are interested in Capitol Hill Village Services and need translation. Please send an email to info@capitolhillvillage.com stating your name, email and phone number.
Capitol Hill Village se dedica a la equidad y el acceso para todos los miembros de la comunidad. Si está interesado en los Servicios de Capitol Hill Village y necesita traducción. Envíe un correo electrónico a info@capitolhillvillage.com indicando su nombre, correo electrónico y número de teléfono.
- Volunteers and staff can take requests for translations
- CHV is engaged in ongoing outreach to community organizations, faith-based organizations and community agencies.

Monitoring/updating the plan This plan will be updated once every three years based on feedback, updated demographic data, and resource availability.

As part of ongoing outreach to community organizations, Capitol Hill Village will solicit feedback on the effectiveness of language assistance provided and unmet needs. Based on the feedback received from community members and agency employees, Capitol Hill Village 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 Capitol Hill Village will attempt to identify the most cost-effective approaches.

As the community grows and new LEP groups emerge, Capitol Hill Village will embrace the opportunity to address the needs for additional language assistance and create equally sensitive programs to reflect the entire community.

A copy of Capitol Hill Village's LAP is attached as APPENDIX E

7. 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."

Capitol Hill Village has transit-related, non-elected planning boards, advisory councils or committees, or similar committees, the membership of which we select. Members of these groups are selected on a number of criteria. First is the applicable skills and experience that the individual has to further the cause. Second we work to ensure that such groups represent the demographics of the community this includes features such as race, socio-economic level, gender and sexual orientation, and ranges of differently-abled persons as well as age.

Recruitment efforts:

1. Capitol Hill Village conducts recruitment in three ways. First, define the needs for committee by identifying goals and objectives and the skills and knowledge needed. Second, among staff and board members we brainstorm identifying likely candidates. We also rely strongly on peer-to-peer engagement and tap informal leaders across the community (faith, housing, business) seeking their ideas and feedback. As a part of that we look to identify a range of diversity factors including race, socio-economic level, gender and sexual orientation, and ranges of differently-abled persons as well as age

Membership of CHV Committees

Committee	Black or African American	White/ Caucasian	Latino/ Hispanic	American Indian or Alaska Native	Asian	Native Hawaiia n or other Pacific Islander	Other *Note	Totals
Board of Directors	1	11	1	0	0	0	2	14
Pedestrian Advisory Council	1	2	0	0	0	0	0	3
Advocacy Corps	8	20	3	0	5	0	0	36
Transport DC Advisory Group	2	1	0	0	0	0		3

A copy of Capitol Hill Village's TABLE OF MINORITY REPRESENTATION ON COMMITTEES is attached as APPENDIX F.

APPENDIX A: Capitol Hill Village's TITLE VI NOTICE TO THE PUBLIC; LIST OF LOCATIONS



www.capitolhillvillage.org

Title VI Policy:

Capitol Hill Village is committed to ensuring that no person is excluded from participation in, or denied the benefits of its 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 need further information or feel you are being denied participation in or being denied benefits provided by Capitol Hill Village, or otherwise being discriminated against because of your race, color, national origin, gender, age, or disability, please contact: executive director Molly Singer at msinger@capitolhillvillage.org. Or contact the president of the Board of directors, Phil Guire at president@capitolhillvillage.org.

Limited English Proficiency

Capitol Hill Village is dedicated to equity and access for all community members. If you are interested in Capitol Hill Village Services and need translation, please send an email to info@capitolhillvillage.com stating your name, email and phone number.

Capitol Hill Village se dedica a la equidad y el acceso para todos los miembros de la comunidad. Si está interesado en los Servicios de Capitol Hill Village y necesita traducción. Envíe un correo electrónico a info@capitolhillvillage.com indicando su nombre, correo electrónico y número de teléfono.

Capitol Hill Village is committed to ensuring meaningful access to its programs and activities by LEP persons. A "four-factor" analysis, developed by the federal government, is used to help determine how to ensure reasonable and meaningful access to Capitol Hill Village activities, including:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient.
2. The frequency with which LEP persons come into contact with the program.
3. The nature and importance of the program, activity or service provided by the program to people's lives.
4. Assessment of the Resources Available to the Agency and Costs

Capitol Hill Village's Notice to the Public is listed in the following locations

1. On its website at the following link: <http://capitolhillvillage.org/?pg=60>
2. In the August 2018 Capitol Hill Village Newsletter
3. On a bulletin board in the Capitol Hill Village Office.
4. In the CHV Personnel Manual

Molly Singer

Capitol Hill Village,

725 8th St SE, Washington DC 20003

Executive Director

Title

November 8, 2018

Date

P: (202) 543 1778

msinger@capitolhillvillage.org

APPENDIX B: SAMPLE CAPITOL HILL VILLAGE TITLE VI COMPLAINT FORM



www.capitolhillvillage.org

Instructions: Please complete this form and sign. Please make sure all answers are legible. Send the form to the executive director at msinger@capitolhillvillage.org or to the president of the board at: president@capitolhillvillage.org. Or the document can be mailed to: Executive Director or President of the Board, Capitol Hill Village, 725 8th St SE, Washington DC 20003. Phone: (202) 543 1778

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:

☐ Federal Agency: _____

☐ Federal Court _____

☐ State Court _____

☐ State Agency _____

☐ Local Agency _____

Please provide information about a contact person at the agency/court where the complaint was filed.

Name: _____

Title: _____

Agency: _____

Address: _____

Telephone: _____

Section VI

Name of agency complaint is against: _____

Contact person: _____

Title: _____

Telephone number: _____

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

Signature and date required below

Signature

Date

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

Executive Director, Capitol Hill Village, 725 8th St SE, Washington DC 20003

APPENDIX C: SAMPLE Capitol Hill Village Title VI Transportation STATUS REPORT



www.capitolhillvillage.org

TITLE VI STATUS REPORT

Investigations, lawsuits or complaints alleging discrimination with respect to service or benefits.

	DATE	SUMMARY: basis, race, age, etc	STATUS	ACTIONS
COMPLAINTS				
1.				
2.				
3.				
INVESTIGATIONS				
1.				
2.				
3.				
LAWSUITS				
1.				
2.				

1. Description of all pending applications for financial assistance and all financial assistance currently provided by other Federal agencies to the grantee.
 - [INSERT DATE FILED OR AWARDED, FUNDING AGENCY, AND DESCRIPTION]
 - [INSERT DATE FILED OR AWARDED, FUNDING AGENCY, AND DESCRIPTION]
2. Summary of all civil rights compliance reviews conducted by other local, state or Federal agencies in the last three (3) years.

REVIEW TYPE	YEAR	AGENCY CONDUCTING REVIEW	RESULT	ACTION(S)
1.				
2.				
3.				

There have been no civil rights compliance review conducted of Capitol Hill Village in the last three (3) years.

Molly Singer

Molly Singer
Executive Director

JNovember 8, 2018

DATE

APPENDIX D: CAPITOL HILL VILLAGE PUBLIC OUTREACH and PARTICIPATION PRACTICES



CAPITOL HILL VILLAGE PUBLIC OUTREACH PRACTICES:

Capitol Hill Village does not provide fixed route public transit. Nevertheless, we conduct outreach to disadvantaged individuals and communities.

This Public Participation Plan (“PPP”) is a guide for ongoing public outreach and participation. Its purpose is to ensure that Capitol Hill Village (CHV) 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.

Capitol Hill Village established a public participation plan and process to determine how, when, and how often specific public participation activities should take place, and which specific measures are most appropriate.

Given the scope of CHV’s programs and services, categories for which Capitol Hill Village considers supplemental tools and resources necessary include:

- Language translation
- Accessibility
- Inclusivity
- Audio and visual enhancements
- Programmatic content

Public Participation Strategies

General Operational Strategies: CHV works to incorporate equity and access into all of its programs. Tactics that we use to do that include a range of practices such as:

Meetings: Before any meeting or activity, CHV considers an assessment of whether the event lends itself to specific audiences, based on content. CHV’s meetings for the public are held in public and accessible locations between 9 am and 7 pm. CHV ensures meetings are held in familiar community settings, such as libraries and community centers. Such meetings have an agenda, available before the meeting.

Notice to the Public: Meetings are listed on the CHV website, in the CHV newsletter, and through the CHV weekly newsblast. CHV promotes meetings and activities through community listserves and with fliers at coffee shops, public housing communities, libraries and other locations. Furthermore, we conduct targeted one-on-one outreach to ensure that disadvantaged clients know about and have access to attend the meeting by helping with transportation or other potential barriers. CHV also regularly posts meeting presentations, notes or other resources on the CHV website. Upon request, CHV provides large print materials. Also, in instances where individuals cannot attend an event, we work to make sure that person is engaged through one-on-one or small peer groups so that they can participate and learn. Likewise at public meetings, which can attract 50-100 people, CHV works to increase public engagement in two ways. First, there are Q/A sessions as a part of the meetings. Secondly, as appropriate, meetings have community break out and planning events where individuals can provide input in a smaller setting around specific programmatic components.

Assisted Participation: CHV has a team of trained volunteers to work with individuals who need assistance to participate in programs or activities. Examples of this may be low vision or cognitively impaired persons. For information gathering or feedback purposes, CHV creates assistance protocol and scripts for volunteers to follow to ensure engagement, but not biasing of clients.

Language Translations: According to Statistical Atlas (www.statisticalatlas.com) over 94% of CHV's service area speaks English as a first language or speaks English "very well." Nevertheless, CHV has staff who are bi-lingual in Spanish and French and can serve as translators. CHV has access to a phone interpreter in many languages, as available through Trans Perfect Connect <http://www.transperfectconnect.com>. CHV can also arrange for documents to be transcribed through this service. In the event that an individual comes to our office without warning we can connect through them. As a very short-basic communication (as in to schedule a time or place or convey basic information – CHV uses Google Translate <https://translate.google.com>. At public events all individuals are encouraged to register ahead of time and identify their needs. With this information CHV can arrange for an interpreter as needed.

Accessibility: CHV makes every effort to ensure that its public programs are accessible for individuals with physical restrictions. Likewise, we work to ensure that all individuals have transportation. When activities are held in private homes we list the number of steps or other access barriers for individuals.

Inclusivity: CHV works to ensure inclusivity in three ways. First, we have direct partnerships with all range of organizations and networks. For example we work with three separate low income senior housing communities and so we can share information through those networks. We also often host activities at those locations. We also post fliers and information on a range public bulletin boards, on listservs, in church bulletins and more. Our staff and board reflect the diverse population of our community.

Audio and Visual Enhancements: Many of CHV's clients are low vision and reduced hearing. To augment this we connect clients to a range of tools to compensate. For example, low vision members have readers where they can have documents read to them. Likewise we reserve seating and ensure safe spaces to accommodate low vision members. CHV can make large print documents upon request. CHV works with Gallaudet University's audiology department to create spaces that facilitate hearing through setting, tools of personal implements. For example, we have wireless microphones that direct to hearing aids. We can borrow wireless room loops that create stronger audio experience. And, most simply, we use a sound system and speakers.

Programmatic Content: CHV's program content is sensitive to many perspectives and experiences. Furthermore, we work to ensure that diverse experiences are accounted for and represented. In that same light, we work to make sure that materials are clear, easy to understand and that individuals with cognitive impairment or other issues have assistance in participating. Likewise we ensure a range of content, for example, we support the work of the DC Multi-modal accessibility advisory council by featuring its members and work at CHV events.

Partners: We do not know it all. CHV relies on our network and partners to help us ensure equity and access in all of our practices. For example, we are a part the Administration of Community Living's TransitPlanning 4 All Technical Expert Panel where we can engage with many efforts and learn from the practices of others.

APPENDIX E: LANGUAGE ASSISTANCE PLAN TEMPLATE



LANGUAGE ASSISTANCE PLAN FOR PERSONS WITH LIMITED ENGLISH PROFICIENCY (“LEP”)

Introduction and Legal Basis

LEP is a term that defines any individual not proficient in the use of the English language. The establishment and operation of an LEP program must meet the objectives set forth in Title VI of the Civil Rights Act and Executive Order 13116, Improving Access to Services for Persons with Limited English Proficiency (LEP). This Executive Order requires federal agencies receiving financial assistance to address the needs of non-English speaking persons. The Executive Order also establishes compliance standards to ensure that the programs and activities that are provided by a transportation provider in English are accessible to LEP communities. This includes providing meaningful access to individuals who are limited in their use of English. The following LEP language implementation plan, developed by Capitol Hill Village is based on FTA guidelines.

FACTOR 1:

Capitol Hill Village 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. According to Statistical Atlas (www.statisticalatlas.com) over 94% of CHV’s service area speaks English as a first language or speaks English “very well.”

Below is a table of most second languages among CHV’s service area.²

Language	% at Home	Language	% at Home	Language	% at Home	Language	% at Home
Spanish	7	French	1.1	Chinese	.9	African	.5

As required, Capitol Hill Village developed a written LEP Plan (below). Using 2010 and American Community Survey (ACS) Census data, Capitol Hill Village has evaluated data to determine the extent of need for translation services of its vital documents and materials.

FACTOR 2

As a matter of practice, Capitol Hill Village encounters LEP individuals less than 1% of its encounters. Likewise, in our conversations with other service providers, they concur that LEP individuals are rarely encountered. CHV also regularly attends community meetings and public hearings around transportation and mobility and identifies issues, discussion points, and the physical presence of participants. Our findings indicate that the few LEP individuals who interact with transit, transportation and mobility options have difficulty because of use of Apps, familiarity with systems, and opportunities for assistance before and during trips. Assistance comes in planning transportation before the trip, accompaniment, and assistance available en route. Community partners with whom we work include: So Others Might Eat, Seabury Senior Services Ward 6, and Yellow Cab Taxi Company which manages Transport DC \$5 cab rides. We also participate in (and chair committees of) DC’s Senior Advisory Council which is a cohort of senior serving organizations from across the city. Through this engagement we keep a pulse on emerging LEP issues. These communications are largely through in person professional meetings, presentations and community wide discussions.

² <https://statisticalatlas.com/neighborhood/District-of-Columbia/Washington/Capitol-Hill/Languages>

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 accurately assess contacts. Likewise, we will continue partnering with other agencies whose scope of service is larger than ours.

FACTOR 3

Capitol Hill Village provides the following programs, activities and services:

- Volunteer recruitment and rides
- Transportation and mobility education and training
- Transportation mentoring
- Driver's Education and safety training

Based on past experience serving and communicating with LEP persons and interviews with community agencies, as well as a community surveys we learned that there are no immediate or ongoing needs to regularly produces materials, trainings, or services for LEP. Nevertheless, we remain ready to serve them and have staff who are fluent in speaking and writing Spanish and French and have served as translators in community settings. We also have partnerships and can make referrals to agencies specializing in services for Spanish-speaking individuals, Terrific Inc, in Ward 1.

LEP persons can be a significant market for public transit, and reaching out to these individuals can help increase their utilization of transit. However, CHV does not provide public transit.

CHV has access to a phone interpreter in many languages, as available through Trans Perfect Connect <http://www.transperfectconnect.com>. CHV can also arrange for documents to be transcribed through this service. In the event that an individual comes to our office without warning we can connect through them. As a very short-basic communication—as in to schedule a time or place or convey basic information – CHV uses Google Translate <https://translate.google.com>.

At public events all individuals are encouraged to register ahead of time and identify their needs. If someone needs a translator, CHV will identify and provide one. With this information CHV can arrange for an interpreter as needed. Additionally, CHV can provide Spanish speaking drivers for individuals who are not able to speak English well.

The following language assistance measures are currently being provided by Capitol Hill Village

- CHV has access to a phone interpreter in many languages, as available through Trans Perfect Connect <http://www.transperfectconnect.com>. CHV can also arrange for documents to be transcribed through this service. In the event that an individual comes to our office without warning we can connect through them. As a very short-basic communication—as in to schedule a time or place or convey basic information – CHV uses Google Translate <https://translate.google.com>.
- At public events all individuals are encouraged to register ahead of time and identify their needs. If someone needs a translator, CHV will identify and provide one. With this information CHV can arrange for an interpreter as needed.
- Additionally, CHV can provide Spanish speaking drivers for individuals who are not able to speak English well.
- CHV has staff and volunteers who can translate verbally and printed materials as needed.
- Additionally, CHV can provide Spanish speaking drivers for individuals who are not able to speak English well.

We anticipate that these activities and costs may increase as follows: We do not anticipate needing additional services, but if we did we anticipate an hourly cost of \$150 and a personnel cost of \$100 for each event for the time to plan and manage translation.

Based on the analysis of demographic data and contact with community organizations and LEP persons, Capitol Hill Village has determined that current services are adequate and additional services are not needed.

Responding Via Telephone: Staff who answer calls from the public respond to LEP customers as follows:

Staff transfer the call to one of two Spanish speakers in the office. If they are not present, staff use google translate to schedule a time for the person to call back when the Spanish speaker is in the office. Or, staff take the phone number of the person and have the staff member call them back ASAP. All staff members can

Lo siento, no hablo español. Si me puede decir su número de teléfono en ingles, le voy a hacer devolver su llamada por un colega que habla español. Gracias por su llamada. Porfavor dime su nombre. Y . . . Por favor habla despacio.

Gracias por llamar y le devolveremos su llamada en breve.

Responding to Written Communications from LEP Persons

CHV has the ability to respond to written communications from persons writing in Spanish. And we could hire translators for other languages.

Responding to LEP Individuals in Person

The following procedures are followed an LEP person visits our offices:

- CHV has staff who a bi-lingual in Spanish and French and can serve as translators.
- CHV has access to a phone interpreter in many languages, as available through Trans Perfect Connect <http://www.transperfectconnect.com>. In the event that an individual comes to our office without warning and there are no Spanish-speaking staff, we can connect through them.
- As a very short-basis communication (as in to schedule a time or place or convey basic information – CHV uses Google Translate <https://translate.google.com>).

Drivers: The following procedures are followed by operators when an LEP person has a question on board a Capitol Hill Village vehicle:

- CHV has Spanish Speaking drivers who can answer questions and so if we have a Spanish speaker we would ensure a Spanish Speaking driver.
- In the event that an LEP person is riding with a person who does not speak the language, we will instruct and demonstrate how to use the google translate App on their smart phone.

Staff Training As noted previously, all Capitol Hill Village staff is provided with a list of available language assistance services and additional information and referral resources, updated annually.

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

- Review CHV's policies and practices, as outlined here regarding LEP.
- A summary of the number and proportion of LEP persons in Capitol Hill Village's activities to the population;
- A description of the type of language assistance that Capitol Hill Village is providing and instructions on how agency staff can access these products and services; and

Providing Notice to LEP Persons

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

- This statement is on our website. <http://capitolhillvillage.org/?pg=60>

Capitol Hill Village is dedicated to equity and access for all community members. If you are interested in Capitol Hill Village Services and need translation. Please send an email to info@capitolhillvillage.com stating your name, email and phone number.

Capitol Hill Village se dedica a la equidad y el acceso para todos los miembros de la comunidad. Si está interesado en los Servicios de Capitol Hill Village y necesita traducción. Envíe un correo electrónico a info@capitolhillvillage.com indicando su nombre, correo electrónico y número de teléfono.

- Volunteers and staff can take requests for translations
- CHV is engaged in ongoing outreach to community organizations, faith-based organizations and community agencies.

Monitoring/updating the plan This plan will be updated once every three years based on feedback, updated demographic data, and resource availability.

As part of ongoing outreach to community organizations, Capitol Hill Village will solicit feedback on the effectiveness of language assistance provided and unmet needs. Based on the feedback received from community members and agency employees, Capitol Hill Village 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 Capitol Hill Village will attempt to identify the most cost-effective approaches.

As the community grows and new LEP groups emerge, Capitol Hill Village will embrace the opportunity to address the needs for additional language assistance and create equally sensitive programs to reflect the entire community.

APPENDIX F: TABLE OF MINORITY REPRESENTATION ON COMMITTEES



Committee	Black or African American	White/ Caucasian	Latino/ Hispanic	American Indian or Alaska Native	Asian	Native Hawaiian or other Pacific Islander	Other *Note	Totals
Board of Directors	1	11	1	0	0	0	2	14
Pedestrian Advisory Council	1	2	0	0	0	0	0	3
Advocacy Corps	8	20	3	0	5	0	0	36
Transport DC Advisory Group	2	1	0	0	0	0		3

APPENDIX G: GOVERNING BODY APPROVAL DOCUMENT



I hereby acknowledge the receipt of the Capitol Hill Village Title VI Implementation Plan 2018-2021 I have reviewed and approve the Plan. I am committed to ensuring that no person is excluded from participation in, or denied the benefits of Capitol Hill Village transportation services on the basis of race, color, or national origin, as protected by Title VI according to FTA Circular 4702.1B, Title VI requirements and guidelines for Federal Transit Administration sub-recipients.

A handwritten signature in blue ink, appearing to be "P. Guire", is written above a horizontal line.

Phil Guire
Capitol Hill Village Board President

11/8/2018

Date

Except from Board Meeting Minutes Below

At the June 12, 2018 regular meeting of the Capitol Hill Village Executive Committee the following was discussed and unanimously approved:

Capitol Hill Village's revised Title VI Plan and related training, promotion, and implementation. President Phil Guire signed the document. The meeting took place at the Compass Real Estate Capitol Hill Offices (660 Pennsylvania Ave SE) from 4-6 pm.

Respectfully submitted,

Jeffrey Gabardi
Board Secretary



Title VI Policy

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).

Capitol Hill Village is committed to ensuring that no person is excluded from participation in, or denied the benefits of its 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 need further information or feel you are being denied participation in or being denied benefits provided by Capitol Hill Village, or otherwise being discriminated against because of your race, color, national origin, gender, age, or disability, please contact:



www.capitolhillvillage.org

TITLE VI COMPLAINT FORM (2 pp)

Instructions: Please complete this form and sign. Please make sure all answers are legible. Send the form to the executive director at msinger@capitolhillvillage.org or to the president of the board at: president@capitolhillvillage.org. Or the document can be mailed to: Executive Director or President of the Board, Capitol Hill Village, 725 8th St SE, Washington DC 20003.

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				



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If yes, check all that apply:	
<input type="checkbox"/> Federal Agency: _____	
<input type="checkbox"/> Federal Court _____	<input type="checkbox"/> State Agency _____
<input type="checkbox"/> State Court _____	<input type="checkbox"/> Local Agency _____
Please provide information about a contact person at the agency/court where the complaint was filed.	
Name: _____	
Title: _____	
Agency: _____	
Address: _____	
Telephone: _____	
Section VI	
Name of agency complaint is against: _____	
Contact person: _____	
Title: _____	
Telephone number: _____	

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

Signature and date required below

Signature

Date

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