

Title VI Implementation Plan
Title VI of the Civil Rights Act of 1964
2021-2023

Worcester County Developmental Center, Inc.



Adopted date

July, 2020

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I. INTRODUCTION

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

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

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

Recipients of public transportation funding from FTA and the Maryland Department of Transportation Maryland Transit Administration (MDOT MTA) 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 **Worcester County Developmental Center, Inc., a private non-profit organization**, incorporates nondiscrimination policies and practices in providing transportation services to its clients.

II. OVERVIEW OF SERVICES

Mission Statement

Worcester County Developmental Center is committed to empowering adults with developmental and physical disabilities to be productive, responsible, and participating members of the community by identifying, enhancing and creating opportunities so all individuals can achieve their highest level of economic and social independence.

Vision Statement

The Eastern Shore Center of Choice

Core Principles

INDEPENDENCE- Our clients are primary decision makers in all aspects of their lives.

PRODUCTIVITY- Our clients have opportunities to work.

INCLUSION- Our clients have the right to participate fully in their communities

Services

The Worcester County Developmental Center (WCDC) is guided by the principles that the people receiving services are the primary decision makers in all aspects of their lives; and they have the right to participate fully in the community. WCDC provides individuals with intellectual disabilities opportunities to engage in productive work, independent living, social relationships, meaningful lives, and integration into the larger community to the greatest extent possible for each individual. WCDC provided the supports necessary to maximize an individual's rights, choices and decision making opportunities. All services are designed to support each person's vision of the life he/she wishes to live and the steps needed to achieve those goals. WCDC does this through several programs: Day Habilitation, Supported Employment, Community Learning Services, Residential Habilitation, Shared Living and Family and Individual Support Services.

The Day Program primarily operates as a pre-vocational training facility and provides services for individuals with a wide variety of capabilities with the goal of preparing the participants for Community Integrated Employment. Areas of pre-vocational training include, but are not limited to, learning work habits, communication skills and work skills. Everyone is given the opportunity to excel at activities that are suited to his or her skills and interests, as determined in the individual's Person Centered Plan (PCP) and Individual Plan (IP). If an individual chooses to change his/her activities, he/she may do so by communicating the choice to the program

coordinator. While individuals are being trained, they earn wages, in accordance with State and Federal regulations, by engaging in real work contracted with local businesses. Individuals also receive opportunities to participate in life skills classes, which include training and counseling to improve motor skills, social skills, communication skills, personal hygiene skills, leisure skills, and community integration. Access to physical and occupational therapy as well as other therapies is available. Transportation is provided to and from the Day program, and a free lunch is served daily. Community Learning Services (CLS) are also available as part of Day Habilitation. CLS is predicated on the belief that all individuals with developmental disabilities can work when given the opportunity, training and supports that build on the individual's strengths. All services are community-based and designed to assist the individual in achieving personal growth and employment. The services are provided in 1-1 settings or in small groups of no more than 4 like-minded individuals. Activities may include job shadowing, job exploration, self-improvement classes and /or classes at local colleges. Employment Discovery and Customization (ED&C) is another service option available to those who are ready for a job in the community. These services are designed to provide supports to investigate job opportunities in competitive, integrated employment that pays a comparable wage, as well as the possibility of self-employment. These services are limited to no more than a six month period, and can include training in mobility, work modification, proper work behaviors and benefit counseling as well as specific job skills training. WCDC is working toward providing all day habilitation services in a manner similar to CLS/ED&C in order to achieve compliance with the Home and Community Based Services Final Rule. At this time, WCDC is making the transition by providing services to groups of no more than 4 individuals from the day habilitation program in integrated, community-based settings in Worcester and Wicomico counties. These services are designed to assist individuals develop the skills and social supports to help them increase their employability and their ability to live independently.

The Supported Employment Program provides individuals with the assistance needed to find, maintain and advance in community integrated employment. Individuals participating in the vocational program are provided with training and on-going coaching and counseling in the skills required to perform their particular job as identified in the individual's IP. Training may include, but is not limited to, specific job skills, community mobility training, appropriate job and social behaviors, job seeking and interviewing skills and money management. Transportation is provided for community workers but individuals are encouraged and supported to discover and utilize supports available within the community, such as public transportation and shared rides, so as to maximize their independence. Through worksite visits and discussions with the individual and employer, job performance is monitored and additional training/counseling is provided if and as needed. WCDC provides its job coaches with DDA mandated training as well as ongoing employment training. WCDC will be adding additional training leading to national certification for its Employment Training Specialists.

The Residential Program operates and supports a variety of residential choices within local communities. Services are provided in Group Homes (4 or more individuals,) or Alternative Living Units (up to 3 people) with attending 24 hour supervision. The goal of the residential program is to provide training in daily skills such as vacuuming, doing laundry, budgeting, meal selection and preparation and social interaction. WCDC also supports Shared Living Arrangements where local families in the community share their homes and lives with

individuals and help the individuals learn and develop housekeeping skills, social behavior skills and self-advocacy skills. We also have individuals who live on their own in the community. For shopping, housekeeping and money management. The Residential Program recognizes that individuals with intellectual disabilities have the same options, skills, and choices regarding where and with whom to live in the community as are available to people without disabilities. The Residential Program integrates personal choice with necessary support as indicated in the IP, so as to maximize success and be as independent as possible in their own care in the home and in the community at large. Transportation services are provided for medical appointments and to access activities in the community.

Family and Individual Support Services provide flexible and dynamic assistance to individuals in order to enable participation within the community. Supports change and adapt to meet the individual's current needs. Supports are integral to each individual's quality of life and are intended to enhance the lives of those involved. Support Services include transportation assistance and mobility training; grocery shopping; job coaching; budgeting; counseling; and assistance with other daily activities; development of relationships; and participation in social activities. Support Services are identified within the individual's IP.

Staffing within the Day, Vocational, and Residential Programs is allocated so as to accommodate staff-to-individual ratios determined in each individual's IP and in compliance with the HCBS Final Rule. Staffing for Family and Individual Support Services is determined based upon each individual's needs as identified in the IP. All staff members at WCDC receive training within specified time frames, in adherence to COMAR regulations and WCDC policy & Procedure D.400. Additional training is provided when unique training needs are identified in the IP. WCDC is preparing to offer new trainings to help staff acquire the skills they will need to facilitate the move to community based and integrated activities.

Day Program services are located at WCDC's primary site and satellite sites, such as the transitional work experiences offered at Most Blessed Sacrament School and the Toulson Feral Courthouse, and integrated into the community to the fullest extent possible. Some Supported Employment Program Services such as job readiness training and mock interviews are provided both at WCDC's primary facility and within the community at various businesses. All other Supported Employment services are provided in the community. Residential Program services are provided at an individual's home or WCDC residence at sites across Worcester County. Respite Services are provided at WCDC residential sites. Family and Individual Support Services are provided within the least restrictive environment.

WCDC serves an unduplicated 93 individuals at the present time at our primary site in Newark, MD. Residentially we serve 35 individuals in group homes, ALU and Personal Supports settings. WCDC also supports 3 individuals in Shared Living settings and 2 individuals who live independently in the community. Our SE program serves 11 individuals in the community. We facilitate offering for 32 individuals using Personal Supports funding.

III. POLICY STATEMENT AND AUTHORITIES

Title VI Policy Statement

Worcester County Developmental Center 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.

Worcester County Developmental Center'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



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 MDOT MTA

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 Maryland Department of Transportation Maryland Transit Administration (MDOT MTA) submits its annual certifications and assurances to FTA. The MDOT MTA shall collect Title VI assurances from sub-recipients prior to passing through FTA funds.

As part of the Certifications and Assurances submitted to MDOT MTA at the time of grant application and award, **Worcester County Developmental Center, Inc.** 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 the assurance, **Worcester County Developmental Center, Inc.** confirms to MDOT MTA our commitment to nondiscrimination and compliance with federal and state requirements.

V. PLAN APPROVAL DOCUMENT

I hereby acknowledge the receipt of the Worcester County Developmental Center, Inc's Title VI Implementation Plan 2021-2023. 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 Worcester County Developmental Center's transportation services on the basis of race, color, or national origin, as protected by Title VI according to C 4702.1B Title VI requirements and guidelines for Federal Transit Administration sub-recipients.

Mark F Cerbo

DEC 2, 20

Mark Cerbo, Board President

Date:

Worcester County Developmental Center, Inc.

Worcester County Developmental Center, Inc.'s Board of Directors has approved the Title VI Plan. A copy of the approval notice is attaches as APPENDIX G

VI. ORGANIZATION AND TITLE VI PROGRAM RESPONSIBILITIES

Under the authority of **Worcester County Developmental Center, Inc.**, the Human Resource Director will serve as the Title VI Manager and is 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 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 public client group(s) served 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, Worcester County Developmental Center, Inc. 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, **Worcester County Developmental Center, Inc.** is required to submit a Quarterly Report Form to the MDOT MTA that documents any Title VI complaints received during the preceding quarter and for each year. Worcester County Developmental Center, Inc. will also maintain and provide to the MDOT MTA on an annual basis, the log of public outreach and involvement activities undertaken to ensure that client minority and low-income people have had meaningful access to these activities.

Further, we will submit to MDOT MTA 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
- Public Participation Plan (PPP)
- Language Assistance Plan (LAP)
- 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
- Minority representation on Committees by race

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 program beneficiaries, as described in the "Public Outreach and Involvement" section of this document, and in other languages when needed according to the LAP 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 prohibited non-discrimination requirements or to unequal treatment or discrimination in the receipt of benefits/services. Worcester County Developmental Center, Inc. will report the complaint to MDOT MTA within three business days (per MDOT MTA 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 Element 1, Data Collection, and reported annually (in addition to immediately) to MDOT MTA.

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 (Element 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, promotion and an annual basis. This training will include requirements of Title VI, our obligations under Title VI (LEP requirements included), 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 Human Resource Director and Facilities Manager

8. Title VI Clauses in Contracts

In all Federal procurements requiring a written contract or Purchase Order (PO), **Worcester County Developmental Center's** contract/PO will include appropriate non-discrimination clauses. The Title VI Manager will work with the Program Directors who is/are responsible for procurement contracts and PO's to ensure appropriate Federal non-discrimination clauses are included.

VII. GENERAL REPORTING REQUIREMENTS

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, Worcester County Developmental Center, Inc. shall disseminate this information to the public by posting a Title VI notice on the agency's website, in public areas of the agency's office(s), including the reception desk, meeting rooms, in all Federally-funded vehicles, etc.

See APPENDIX A

TITLE VI COMPLAINT PROCEDURES

REQUIREMENT TO DEVELOP TITLE VI COMPLAINT PROCEDURES AND COMPLAINT FORM.

In order to comply with the reporting requirements established in 49CFR Section 21.9(b) Worcester County Developmental Center, Inc. shall develop procedures for investigating and tracking Title VI complaints filed against us and will make this procedures for filing a complaint available to members of the public. Worcester County Developmental Center, Inc. has also developed a Title VI complaint form. The form and procedure for filing a complaint are available on the Worcester County Developmental Center, Inc. website and at their facilities.

Any individual may exercise his or her right to file a complaint with **Worcester County Developmental Center Inc.** 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 MDOT MTA within three business days (per MDOT MTA requirements), and make a concerted effort to resolve complaints locally, using the agency's Nondiscrimination Complaint Procedures. All Title VI complaints and their resolution will be logged and reported annually (in addition to immediately) to MDOT MTA.

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.

Worcester County Developmental Center Inc. 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:

Worcester County Developmental Center Inc. is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transportation services on the basis of race, color or national origin, as protected by Title VI in the Federal Transit Administration (FTA) Circular 4702.1B. For additional information on Worcester County Developmental Center's nondiscrimination policies and procedures, or to file a complaint, please visit the website at www.wcdcservices.org or contact Amy Ballard, Human Resources Director, 8545 Newark Road, Newark, MD 21841.

A copy of Worcester County Developmental Center, Inc., Title VI Complaint Form is attached as APPENDIX B and a sample of the sub recipient may use is provided below.

Appendix B

WCDC Title VI Complaint Form

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	<input type="checkbox"/> Creed <input type="checkbox"/> Sex <input type="checkbox"/> Age
Date of Alleged Discrimination (Day, Month, Year): _____			
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.			

Section IV:			
Have you previously filed a Title VI complaint with this agency?		Yes	No
Section V:			

Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?	
<input type="checkbox"/> Yes	<input type="checkbox"/> No
If yes, check all that apply:	
<input type="checkbox"/> Federal Agency: _____	
<input type="checkbox"/> 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:

WCDC
Attn: Title VI Coordinator
PO Box 70
Newark, MD 21841

Procedures for Handling and Reporting Investigations/Complaints and Lawsuits

Instructions for filing Title VI complaints are posted on the agency's website and provided below. Should any Title VI investigations be initiated by FTA or MDOT MTA, or should any Title VI lawsuits be filed against **Worcester County Developmental Center, Inc.**, the agency will follow these procedures:

Procedures

1. Any individual, group of individuals or entity that believes they have been subjected to discrimination on the basis of race, color, or national origin may file a written complaint with the Title VI Manager.

The complaint is to be filed in the following manner:

- a. A formal complaint must be filed within 180 calendar days of the alleged occurrence.
 - b. The complaint should include:
 - 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)
 - description of the alleged act of discrimination
 - location(s) of the alleged act of discrimination (include vehicle number if appropriate)
 - explanation of why the complainant believes the act to have been discriminatory on the basis of race, color, or national origin
 - if known, the names and/or job titles of those individuals perceived as parties in the incident
 - contact information for any witnesses
 - indication of any related complaint activity (i.e., was the complaint also submitted to MDOT MTA or FTA?)
 - c. The complaint shall be submitted to the Title VI Manager at **P.O. Box 70, Newark, MD 21841 and/or ballard @wcdcservices.org**.
 - d. 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.
2. Upon receipt of the complaint, the Title VI Manager will immediately:
 - a. notify MDOT MTA (no later than 3 business days from receipt)
 - b. notify **Worcester County Developmental Center's** Authorizing Official
 - c. ensure that the complaint is entered in the complaint database.
 3. Within 3 business days of receipt of the complaint, the Title VI Manager will contact the complainant by telephone to set up an interview.

4. The complainant will be informed that they have a right to have a witness or representative present during the interview and can submit any documentation he/she perceives as relevant to proving his/her complaint.
5. If MDOT MTA has assigned staff to assist with the investigation, the Title VI Manager will offer an opportunity to participate in the interview.
6. The alleged discriminatory service or program official will be given the opportunity to respond to all aspects of the complainant's allegations.
7. The Title VI Manager will determine, based on relevancy or duplication of evidence, which witnesses will be contacted and questioned.
8. The investigation may also include:
 - a. investigating contractor operating records, policies or procedures
 - b. reviewing routes, schedules, and fare policies
 - c. reviewing operating policies and procedures
 - d. reviewing scheduling and dispatch records
 - e. Observing behavior of the individual whose actions were cited in the complaint.
9. All steps taken and findings in the investigation will be documented in writing and included in the complaint file.
10. The Title VI Manager will contact the complainant at the conclusion of the investigation (but prior to writing the final report) and give the complainant an opportunity to give a rebuttal statement at the end of the investigation process.
11. At the conclusion of the investigation and **within 60 days** of the interview with the complainant, the Title VI Manager will prepare a report that includes a narrative description of the incident, identification of persons interviewed, findings, and recommendations for disposition. This report will be provided to the Authorizing Official, the MDOT MTA, and if appropriate our 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 MDOT MTA in the event the complainant wishes to appeal the determination. This letter will be copied to MDOT MTA.
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

TRANSPORTATION-RELATED TITLE VI INVESTIGATIONS, COMPLAINTS, AND LAWSUITS

Background

All sub-recipients shall prepare and maintain a list/log of any of the following that allege discrimination on the basis of race, color, or national origin:

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

This list/log 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/log shall be included in the Title VI Program submitted to MDOT MTA every three years and information shall be provided to MDOT MTA quarterly and annually.

A copy of Worcester County Developmental Center, Inc.'s Title VI Log of Investigations, Lawsuits and Complaints is attached as APPENDIX C.

PUBLIC OUTREACH AND INVOLVEMENT - Public Participation Plan

Introduction

The Public Participation Plan (PPP) is a guide for ongoing public participation endeavors. Its purpose is to ensure that **Worcester County Developmental Center, Inc.** 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, 5310 service providers 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.

Worcester County Developmental Center, Inc. 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.

Worcester County Developmental Center Inc. will make these determinations based on a demographic analysis of the population(s) affected, the type of plan, program, and/or service under consideration, and the resources available. Efforts to involve minority and LEP populations in public participation activities may include both comprehensive measures, such as placing public notices at all transit stations, stops, and vehicles, as well as targeted measures to address linguistic, institutional, cultural, economic, historical, or other barriers that may prevent minority and LEP persons from effectively participating in our decision-making process.

Worcester County Developmental Center provides outreach through numerous local outlets. We work closely with the Worcester and Wicomico school districts and meet with families and staff throughout the year. We are closely involved with families and students as they transition out of the schools and into the world of work.

Through our close relationship with the Worcester County Schools, we have contacts with their language teachers who will provide assistance with translation or interpreting if the need arises.

We are a member agency of the United Way and have information on their website. In addition, we are called upon throughout the year to speak to people and organizations in the community about our services.

Yearly, we speak to local civic organizations, such as the Lions, Optimists and Optimist club and churches. We appear on local television shows and regularly place articles in all the local newspapers about our programs and our services.

We work with State agencies such as the Developmental Disabilities Administration and the Division of Rehabilitation Services to provide services, support and information to clients and caregivers. WCDC also has an auxiliary, The Friends of WCDC, whose purpose is not only to support the mission of WCDC but also provide outreach and support to others in the community who live with a disability.

The Plan Participation Plan is included as APPENDIX D

ACCESS FOR LIMITED ENGLISH PROFICIENT (LEP) PERSONS

LANGUAGE ASSISTANCE PLAN (LAP)

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.

As required, **Worcester County Developmental Center, Inc.** developed a written LAP Plan (below) to address the needs of the LEP population(s) it serves. Using 2010 and American Community Survey (ACS) Census data, **Worcester County Developmental Center, Inc.** 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**

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

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

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

THIS LANGUAGE ACCESS PLAN (LAP) IS TO BE INCLUDED AS APPENDIX E

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.”

Worcester County Developmental Center, Inc. has transit-related, non-elected planning boards, advisory councils or committees, or similar committees, the membership of which we select.

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

Appendix A

Title VI Notice to the Public And List of Posted Locations



Working Toward a Brighter Future

Worcester County Developmental Center, Inc. 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).

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

Amy Ballard
Human Resources Director
Worcester County Developmental Center, Inc.
PO Box 70
Newark, MD 21841
(410)632-2382 ext. 112
ballard@wcdcservices.org

Posting Locations:

WCDC Agency Website
WCDC Main Lobby
WCDC Board and Multipurpose Room
All WCDC vehicles

Appendix B

WCDC Title VI Complaint Form

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 <input type="checkbox"/> Creed <input type="checkbox"/> Sex <input type="checkbox"/> Age				
Date of Alleged Discrimination (Day, Month, Year): _____				
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.				

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

Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?	
<input type="checkbox"/> Yes	<input type="checkbox"/> No
If yes, check all that apply:	
<input type="checkbox"/> Federal Agency: _____	
<input type="checkbox"/> 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:

WCDC
Attn: Title VI Coordinator
PO Box 70
Newark, MD 21841

Appendix D

Worcester County Developmental Center's Public Participation Plan

Worcester County Developmental Center provides outreach through numerous local outlets. We work closely with the Worcester and Wicomico school districts and meet with families and staff throughout the year. We are closely involved with families and students as they transition out of the schools and into the world of work.

Summary of outreach during last plan year below.

1. Through our close relationship with the Worcester County Schools, we have contacts with their language teachers who will provide assistance with translation or interpreting if the need arises.
 - a. We did not have an occasions to contact Worcester County Schools language teachers to provide assistance with interpretation or translation. We will keep this outreach contact; however, in case the need does arise in the future.
2. We are a member agency of the United Way and have information on their website. In addition, we are called upon throughout the year to speak to people and organizations in the community about our services.
 - a. We continue to maintain our agency information on the United Way's website and update the information and add events as they arise.
 - b. An agency representative spoke at approximately 25 United Way events/ meetings throughout the three years of this plan. In addition, through our partnership with the United Way, we conducted tours of our agency with students from local elementary, middle and high schools.
3. Yearly, we speak to local civic organizations, such as the Lions, Optimiums and Optimist clubs and churches. We appear on local television shows and regularly place articles in all the local newspapers about our programs and our services.
 - a. An agency representative spoke at the local Lions and Lioness club meetings once each per year in the covered years. In addition, an agency representative spoke at at least one meeting during the covered years to the following groups: Atlantic General Hospital, Snow Hill Rotary Club, Worcester Youth Group, Chamber of Commerce, Knights of Columbus (each year), BNI (each year), Holly Center, Garden Club, and Kiwanis Club.
 - b. We attend, yearly, the Worcester Tech Transition Night.
 - c. We've also given tours at our facility to a number of the clubs listed – Salisbury School, Pocomoke Middle School, Kiwanis Club, Garden Club, and Knights of Columbus.
 - d. Agency representatives spoke on a local radio station each year of the covered years. We also had a float each year in the Ocean City St. Patrick's Day Parade.
 - e. An agency representative joined a local committee, S.W.E.E.T., a school to work transition program that works with local counties and the local community college. The representative attended 5 S.W.E.E.T. meetings during the covered years.

- f. Lastly, we attended a number of job fairs during the covered three years. We attended three at Wor-Wic Community College, one at Stephen Decatur High School, Three at the Salisbury Mall hosted by the One Stop Job Market, 10 at the One Stop Job Market, and we hosted a job fair at our agency.

4. We work with State agencies such as the Developmental Disabilities Administration and the Division of Rehabilitation Services to provide services, supports and information to clients and caregivers. WCDC also has an auxiliary, The Friends of WCDC, whose purpose is not only to support the mission of WCDC but also provide outreach and support to others in the community who live with a disability.
 - a. We worked with the Division of Rehabilitation Services and Developmental Disabilities Administration and the Office of Health Care Quality on a weekly basis during the three years covered in order to better support the individuals we serve.
 - b. The Friends of WCDC put out thirty newsletters during the years covered. In addition, they hosted a family picnic each year, a Finnegan's Wake, and a hold monthly meetings.
 - c. An agency representative spoke at five delegation meetings, three Town Council meetings in Berlin, MD, and spoke to the Worcester County Emergency Planning Committee on one occasion.

Appendix E

Worcester County Developmental Center, Inc.

Language Access Plan

I. Introduction

The Agency has prepared this Language Access Plan (“LAP” or “Plan”), which defines the actions to be taken by Agency to ensure meaningful access to agency services, programs and activities on the part of persons who have limited English proficiency. The Agency will review and update this LAP in order to ensure continued responsiveness to community needs. This Plan 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).

II. Purpose

The purpose of this plan is to ensure clients of the Agency meaningful access to services, programs and activities although they may be limited in their English language proficiency.

The Agency is committed to this Language Access Plan as the appropriate response to meeting our clients’ needs.

Consistent with the guidance of 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), a Limited English Proficient (“LEP”) person is someone who is not able to speak, read, write or understand the English language at a level that allows him/her to interact effectively with Agency staff. A client maintains the right to self-identify as a LEP person.

III. Agency Description

Services

The Worcester County Developmental Center (WCDC) is guided by the principles that the people receiving services are the primary decision makers in all aspects of their lives; that they will have opportunities to work and pursue meaningful, productive lives; and they have the right to participate fully in the community. WCDC does this through several programs: Day Habilitation, Supported Employment, Community Learning Services, Residential Habilitation, Shared Living and Family and Individual Support Services.

The Day Program primarily operates as a pre-vocational training facility and provides services for individuals with a wide variety of capabilities with the goal of preparing the participants for Community Integrated Employment. Areas of pre-vocational training include, but are not limited to, learning work habits, communication skills and work skills.

Individuals also receive opportunities to participate in life skills classes, which include training and counseling to improve motor skills, social skills, communication skills, personal hygiene skills, leisure skills, and community integration. Access to physical and occupational therapy as well as other therapies is available. Transportation is provided to and from the Day Program. Community Learning Services (CLS) are also available as part of Day Habilitation. All services are community-based and designed to assist the individual in achieving personal growth and employment. Activities may include job shadowing, job exploration, self-improvement classes and/or classes at local colleges. Employment Discovery and Customization (ED&C) is another service option available to those who are ready for a job in the community.

The Supported Employment Program provides individuals with the assistance needed to find, maintain and advance in community integrated employment. Individuals participating in the vocational program are provided with training and on-going coaching and counseling in the skills required to perform their particular job as identified in the individual's IP. Training may include, but is not limited to, specific job skills, community mobility training, appropriate job and social behaviors, job seeking and interviewing skills and money management. Transportation is provided for community workers but individuals are encouraged and supported to discover and utilize supports available within the community, such as public transportation and shared rides, so as to maximize their independence.

The Residential Program operates and supports a variety of residential choices within local communities. Services are provided in Group Homes (4 or more individuals), or Alternative Living Units (up to 3 people) with attending 24 hour supervision. The goal of the residential program is to provide training in daily skills such as vacuuming, doing laundry, budgeting, meal selection and preparation and social interaction. WCDC also supports Shared Living Arrangements where local families in the community share their homes and lives with individuals and help the individuals learn and develop housekeeping skills, social behavior skills and self-advocacy skills. We also have individuals who live on their own in the community. For them we provide drop in services as need up to 10 hours per week to help with activities such as shopping, housekeeping and money management. Transportation services are provided for medical appointments and to access activities in the community.

Family and Individual Support Services provide flexible and dynamic assistance to individuals in order to enable participation within the community. Supports change and adapt to meet the individual's current needs. Supports are integral to each individual's quality of life and are intended to enhance the lives of those involved. Support Services include transportation assistance and mobility training; grocery shopping; job coaching; budgeting; counseling; and assistance with other daily activities; development of relationships; and participation in social activities.

IV. Language Access Plan:

Approach: The Agency Language Access Plan shall be fully implemented subject to the availability of fiscal resources to implement said language access plan. This Language Access Plan represents Agency administrative blueprint to provide meaningful access to Agency services, programs and activities on the part of LEP individuals. This Language Access Plan outlines the tasks Agency will undertake to meet this objective.

Language Access Plan:

Agency Language Access Coordinator:

Sonora Goslee, WCDC Program Coordinator
 410-632-2382 ext 116
goslee@wcdcservices.org

Agency Language Access Needs Assessment:

As noted above, Worcester County Developmental Center, Inc. has an LEP population of less than 5%. Furthermore, the agency serves a specific population of adults on the Easter Shore, adults with intellectual disabilities. Our current client population includes one individual from Germany. However, he has been in the United States for most of his life and speaks English fluently. We have provided translation services in the past for him through our local resources. We will continue to provide the services when necessary and identify emerging needs as they arise.

Language makeup of client population

Worcester County Developmental Center, Inc. reviewed data from the *2011 American Community Survey Data* and found less than 5% population of LEP persons in our community/service area. Data for the three counties served by the agency – Worcester, Wicomico, and Somerset – is found below.

Worcester County			
Language	Number of LEP Population	Percent of County Population Speaking Language	Percent of LEP Population Speaking Language
Spanish or Spanish Creole	172	0.35%	36.13%
Italian	103	0.21%	21.64%
Vietnamese	41	0.08%	8.61%
Greek	32	0.06%	6.72%
Chinese	28	0.06%	5.88%
Korean	26	0.05%	5.46%
Russian	16	0.03%	3.36%
Persian	15	0.03%	3.15%
Other Asian languages	14	0.03%	2.94%

French (incl. Patois, Cajun)	7	0.01%	1.47%
German	7	0.01%	1.47%
Armenian	6	0.01%	1.26%
Tagalog	5	0.01%	1.05%
Arabic	4	0.01%	0.84%
Total LEP Population	476	0.97%	100.00%
Total County Population	49,258	100.00%	

Wicomico County			
Language	Number of LEP Population	Percent of County Population Speaking Language	Percent of LEP Population Speaking Language
Spanish or Spanish Creole	2,009	2.11%	38.43%
French Creole	1,467	1.54%	28.06%
Korean	710	0.75%	13.58%
Portuguese or Portuguese Creole	219	0.23%	4.19%
Vietnamese	136	0.14%	2.60%
Arabic	134	0.14%	2.56%
Urdu	107	0.11%	2.05%
Gujarati	102	0.11%	1.95%
Tagalog	97	0.10%	1.86%
Chinese	66	0.07%	1.26%
Russian	36	0.04%	0.69%
Other Asian languages	33	0.03%	0.63%
Greek	24	0.03%	0.46%
Other Indic languages	24	0.03%	0.46%
Thai	23	0.02%	0.44%
French (incl. Patois, Cajun)	22	0.02%	0.42%
German	11	0.01%	0.21%
Polish	7	0.01%	0.13%
Other Slavic languages	1	0.00%	0.02%
Total LEP Population	5,228	5.50%	100.00%
Total County Population	95,051	100.00%	

Somerset County

Language	Number of LEP Population	Percent of County Population Speaking Language	Percent of LEP Population Speaking Language
Spanish or Spanish Creole	251	1.02%	40.61%
Other Asian languages	169	0.68%	27.35%
Chinese	47	0.19%	7.61%
Arabic	37	0.15%	5.99%
Vietnamese	32	0.13%	5.18%
Other Indic languages	18	0.07%	2.91%
Korean	17	0.07%	2.75%
Tagalog	13	0.05%	2.10%
Urdu	12	0.05%	1.94%
German	7	0.03%	1.13%
French (incl. Patois, Cajun)	6	0.02%	0.97%
Italian	5	0.02%	0.81%
Other Slavic languages	4	0.02%	0.65%
Total LEP Population	618	2.50%	100.00%
Total County Population	24,721	100.00%	

Points of contact between agency and client population:

Worcester County Developmental Center serves client at its day program 8545 Newark Rd, Newark MD 21841 and at 9 residential houses throughout Worcester County.

Website: www.wcdcservices.org
Main Phone: 410-632-2382

Agency staff members provide their cell phone numbers to clients as well for constant contact.

Language Resources Assessment:

At this time, we do not have any staff members who are linguistically or culturally able to deliver services in a language other than English and/or serve as interpreters. However, in the past, we have been able to provide technical language assistance to a client. We utilized an online language translation site to translate documents from English to German.

We will provide language assistance as those needs arise in any area necessary through our local resources and/or training for current staff as needed.

Worcester County Developmental Center, Inc has a number of resources available to assist in meeting language access needs. The agency has close contacts within the Worcester County school system, allowing us access to their language teachers for translation and interpretation assistance. The agency works closely with the Worcester County Health Department and can reach out to them for assistance. Lastly, as a Developmental Disabilities Administration (DDA) funded agency, we can reach out to the local DDA Regional office for assistance when needed. Each client we serve has a team of people at the ready to help them reach their goals and provide assistance where/when needed. Each individual's team includes not only their family members and friends, but also a state appointed CCS worker and a representative from the agency.

Language Service Protocols:

Worcester County Developmental Center, Inc will offer in interpretation via phone or in person to it's LEP population. Community based resources will also be offered by partnering with Regional DDA, the Worcester County Health Department, and Worcester County schools. In working with these resources, we will provide the necessary assistant to our clients. We will tailor the services to each client and his/her needs. When interpretive services are needed, we will hold a team meeting to determine the needs and how to meet them.

Once someone with a language access need has been identified, an agency Program Coordinator will contact the Worcester County School system to schedule a meeting - phone or in person- with the appropriate language teacher. From there, the Program Coordinator will contact the local DDA regional office and the clients CCS worker to ensure the needs of that person are met. The Program Coordinator will continue overseeing the process to ensuring the services are met and to coordinate any necessary changes.

Upon entry into our program, each client will have a team meeting. During that meeting, his/her family, friends, and CCS worker will be present, along with a Program Coordinator from the agency. The family can serve as an advocate and translator for the client. If that is not possible, the agency will have one present at the meeting either in person or on the phone. The Program Coordinator will review the resources during the meeting and how to utilize them. The LEP person may also access this information on the agency website, or through signage posted in the building or agency vehicles.

Vital Document Translation:

Worcester County Developmental Center, Inc will provide translation of the following vital documents within 24 hours of the request.

- Title VI Notice to the Public
- Title VI Complaint Procedures
- Title VI Complaint Form
- WCDC Title VI Log of Investigations, Complaints, and Lawsuits
- WCDC Title VI Public Participation Plan
- WCDC Title VI Language Access Plan
- WCD Outreach Efforts and LAP Plan

All information on the agency's website will be translated, upon request, within 24 hours.

Stakeholder Consultations:

The agency consulted its staff members, the Board of Directors, the Worcester County Health Department and School Board and the Regional DDA office in the development of this plan.

Staff Training:

All Worcester County Developmental Center, Inc staff members are provided with a list of available language assistance services and additional information on referral resources. The list is updated annually and distributed.

- All new hires receive training on assisting LEP persons as part of sensitivity/customer service training. The training includes the following.
- A summary of the transit agency's responsibilities under the DOT LEP guidelines;
- A summary of the agency language assistance plan
- A summary of the number and proportion of LEP personal 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 policy on discrimination.
- Annual staff training is conducted to review all policies and procedures related to assisting the LEP population.

Notice to Public:

Worcester County Developmental Center, Inc posts Title VI Notice to the public in the following locations.

- WCDC Agency Website
- WCDC Main Lobby
WCDC Board and Multipurpose Room
- All WCDC vehicles

Agency Monitoring:

The LEP Plan will be reviewed annually and updated every three years as needed based on feedback, new demographic data, and availability of resources.

As part of the ongoing outreach efforts, Worcester County Developmental Center will contact community organization and partners to solicit feedback on the effectiveness of the plan and any unmet needs that should be addressed.

Lastly, when preparing for the three year update, the agency will utilize the Department of Transportation's Language Assistance Monitoring Checklist, located at

<https://www.calact.org/assets/Language%20Assistance%20Checklists.pdf>

Complaints:

Worcester County Developmental Center, Inc. is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transportation services on the basis of race, color or national origin, as protected by Title VI in the Federal Transit Administration (FTA) Circular 4702.1B. For additional information on *Worcester County Developmental Center, Inc.*'s nondiscrimination policies and procedures, or to file a complaint, please visit the website at www.wcdservices.org or contact Amy Ballard, Human Resources Director, 8545 Newark Road, Newark, MD 21841, or simply complete the attached Title VI Complaint Form and follow the submission instructions. For assistance, clients may contact their Program Coordinator or SSC Worker.



Jack Ferry, WCDC Executive Director



Date

Language Access Complaint Procedure

You may file a complaint with the Agency Title VI Manager if you believe you have been denied the benefits of this Plan. You must file your written complaint within 15 of the alleged denial. Submit the written complaint to:

Amy Ballard, Human Resources Director
Worcester County Developmental Center, Inc.
PO Box 70
Newark, MD 21841
ballard@wcdservices.org

Appendix F

Worcester County Developmental Center, Inc.

Minority Representation on Advisory Committee By Race

Committee	Black or African American	White/ Caucasian	Latino/ Hispanic	American Indian or Alaska Native	Asian	Native Hawaiian or other Pacific Islander	Totals
Citizens Advisory Committee (CAC)	1	9	0	0	0	0	10
% of CAC Committee	10%	90%	0	0	0	0	100%
% LEP Population	0	1					1
% of CACAT Committee	0	10%	0	0	0	0	10%

The WDC board of directors unanimously approved by email vote on December 2, 2020, the Title VI documents as attested to by board president Mark Cerbo. President Cerbo has authorized me, Jack Ferry, Executive Director, to present this as evidence of an electronic signature as he cannot sign in person due to the pandemic.

Mark Cerbo
Board President
December 2, 2020

Appendix G