

Anthracite Region Center for Independent Living
(ARCIL)

Title VI Plan

March 17, 2022

Approved by Board of Directors

Date: *3/17/22* Signature: *[Handwritten Signature]* Title: *PRESIDENT*

TABLE OF CONTENTS

1. General Overview	Page 3
2. Notice to the Public	Page 4
3. Complaint Instructions & Procedures	Page 5 – 6
4. Complaint Form	Page 7 – 8
5. Investigations, Complaints & Lawsuits	Page 8
6. Limited English Proficiency	Page 8 – 9
7. Limited English Proficiency Plan	Page 9 – 10
8. Minority Population	Page 10
9. Planning Boards & Committees	Page 10
10. Public Participation Plan	Page 10
11. Subrecipients	Page 10
12. Facilities	Page 11
Appendix A	Page 12

Title VI Plan

Anthracite Region Center for Independent Living

Plan Statement

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).

Anthracite Region Center for Independent Living (ARCIL), also known as Wheels on Wheels (WOW) is committed to ensuring that no person is excluded from participation in, or denied the benefits of its accessible van service on the basis of race, color, or national origin, as protected by Title VI of the Federal Transit Administration (FTA) Circular 4702.1B.

Title VI Information Dissemination

Title VI information poster shall be prominently displayed in all of ARCIL’s vans. All current employees will be trained in their Title VI responsibilities in their daily work and duties. During new employee orientation, new employees shall be informed of the provisions of Title VI and ARCIL’s expectations to perform their duties.

Title VI Policy Notice to the Public

Anthracite Region Center for Independent Living (ARCIL) van service known as Wheels on Wheels (WOW) complies with the Title VI of the Civil Rights Act of 1964 and all related statutes. No person is excluded from participation in, denied the benefits of its services or otherwise subjected to discrimination on the grounds of race, color, or national origin, as provided by Title VI of the Civil Rights Act of 1964, as amended. Any person who believes that he or she has been unlawfully discriminated against may file a formal complaint with ARCIL within 180 days following the date of the alleged incident.

For more information on ARCIL's Title VI Program, obligations, procedures and/or to file a complaint, please:

- Call (570) 455-9800 Ext 1002
- Mail complaint form to:
Denise Corcoran, ARCIL Executive Director
Title VI Coordinator
8 W Broad Street, Suite 228
Hazleton, PA 18201

A complaint may also be filed directly with the Federal Transit Administration or the U.S. Department of Transportation. The addresses are:

Federal Transit Administration Office of Civil Rights
Attn: Title VI Program Coordinator, East Building, 5th Floor-TRC
1200 New Jersey Ave., SE
Washington, DC 20590

U.S. Department of Transportation
Federal Transit Administration's Office of Civil Rights
1760 Market Street, Suite 500
Philadelphia, PA 19103-4124

If information is needed in another language, please call (570) 455-9800 Ext 1006
Si se necesita informacion en otro idioma, por favor llame al (570) 455-9800 Ext 1006

Title VI Complaint Instructions and Procedures

Any person who believes he or she has been discriminated against on the basis of race, color, or national origin by ARCIL – Wheels on Wheels, may file a Title VI complaint by completing and submitting ARCIL's Title VI Complaint Form. ARCIL will investigate all completed complaint forms that are filed no later than 180 calendar days following the date of the incident in question.

How to File a Complaint

- Preferred method is to file a complaint in writing by completing ARCIL's Title VI Complaint Form.
 - Mail Complaint Form to:
ARCIL
8 W Broad St., Ste. 228
Hazleton, PA 18201
ATTN: Denise Corcoran, Title VI Coordinator
- If ARCIL's Title VI Complaint Form is not used a written complaint can be sent. The complaint must be in writing and signed by the individual or his/her representative, it needs to include the complainant's name, address and telephone number; a description of how, when, where and why you believe you were discriminated against including location, names and contact information of any witnesses and any other information you deem significant or important.
- In the case where a complainant is unable or incapable of providing a written statement, a verbal complaint of discrimination may be made to ARCIL's Title VI Coordinator and the coordinator will assist the complainant in completing a written statement. Denise Corcoran, Interim Title VI Coordinator can be reached at (570) 455-9800 Extension 1003.
- The complainant also has the right to file a complaint with the Federal Transit Administration or the U.S. Department of Transportation. The addresses are:
 - U.S. Department of Transportation
Federal Transit Administration's Office of Civil Rights
1760 Market Street, Suite 500
Philadelphia, PA 19103-4124
 - Federal Transit Administration Office of Civil Rights
Attn: Title VI Program Coordinator, East Bldg., 5th Floor – TRC
1200 New Jersey Avenue SE
Washington, DC 20590

Title VI Complaint Procedure

- When a complaint is received by ARCIL, the Title VI Coordinator will provide written acknowledgement within ten (10) business days by registered mail.

- If a complaint is incomplete, additional information will be requested and the complainant will be provided thirty (30) business days to submit the information required. Failure to provide the required information within the thirty (30) days may be considered good cause to close the complaint. A complaint can also be closed if the complainant no longer wishes to continue with the complaint.
- In the case where a complainant is unable or incapable of providing a written statement, a verbal complaint can be made to ARCIL's Title VI Coordinator. The Title VI Coordinator will interview the complainant and assist in completing a written statement.
- Should a complaint be filed with ARCIL and an external entity simultaneously, the external complaint will supersede ARCIL's and ARCIL's complaint procedures will suspend pending the external entity's findings
- Within fifteen (15) business days from receipt of a complete complaint, a determination will be made if the complaint has sufficient merit to warrant an investigation. The complainant will be notified of the decision by registered mail within five (5) business days of the date the decision is made.
 - If the decision is not to investigate the complaint, the notification shall specifically state the reason for the decision.
- If the complaint has sufficient merit the Title VI Coordinator will begin the investigation. The investigation will be conducted and completed within sixty (60) days of the acceptance of the formal complaint.
- Based on all of the information received an investigative report will be written.
- The report will be forwarded to ARCIL's Executive Director.
- A letter will be sent to the complainant stating the final decision at the end of the sixty (60) days.
- Should the complainant be dissatisfied with the decision they will be informed that they have the right to appeal and/or file a complaint with the Federal Transit Administration.

Title VI Complaint Form

Title VI of the 1964 Civil Rights Act requires 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." If you feel you have been discriminated against in transit services, please provide the following information in order to assist us in processing your complaint.

Section 1	
Name:	
Address:	
City, State, Zip Code	
Telephone Number:	
If you require accessible format please specify:	
Section 2	
Are you filing this complaint on your own? Yes <input type="checkbox"/> (Go to Section 3) No <input type="checkbox"/> (Go to next line)	
Please provide the name and address of the person who alleges discrimination	
Name:	
Address:	
Please explain why you are filing this claim for a third party:	
Please confirm that you have obtained permission. Yes <input type="checkbox"/> No <input type="checkbox"/>	
Section 3	
I believe that the discrimination experienced was based on (check all that apply)	
<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin (includes Limited English Proficiency)	
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 and 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 space on the back of the form or use another sheet of paper.	
Section 4	
Have you previously filed a complaint with ARCIL? Yes <input type="checkbox"/> No <input type="checkbox"/>	

Section 5	
<p>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 <input type="checkbox"/> Agency Federal <input type="checkbox"/> Court State <input type="checkbox"/> Agency State <input type="checkbox"/> Court Local <input type="checkbox"/> Agency</p> <p>Please provide information about a contact person at the agency/court where the complaint was filed.</p>	
Name:	Title:
Agency:	Telephone Number:
Address:	
Section 6	
<p><i>You may attach any written materials or other information that you think is relevant to your complaint.</i></p> <p>I affirm that I have read the above and that it is true to the best of my knowledge, information and belief. <i>Signature and date required.</i></p>	
Signature:	Date:
<p>Please submit this form and any additional materials in person or mail to:</p> <p style="text-align: center;">ARCIL 8 W. Broad St., Suite 228 Hazleton, PA 18201 ATTN: Title VI Coordinator</p>	
ARCIL use only: Date Received	Received by:

Title VI Investigations, Complaints and Lawsuits

ARCIL does not have any transit related Title VI investigations, complaints or lawsuits for the current year of 2022.

- 2019 – No Complaints
- 2020 – No Complaints
- 2021 – No Complaints

Limited English Proficiency

The purpose of the ARCIL limited English proficiency plan is to clarify the responsibilities of recipients of federal financial assistance from the US Department of Transportation and assist them in fulfilling their responsibilities to limited English proficient persons, pursuant to Title VI of the civil Rights Act of 1964 and implementing regulations. ARCIL’s plan was developed using the FTA’s Four Factor Analysis. A brief description of these considerations is provided in the following section.

Four Factor Analysis

1. Determining the number and proportion of LEP persons served or encountered in the ARCIL area.

ARCIL's van service serves the Hazleton Area. According to the 2010 census, Hazleton has a 37.3% Hispanic/Latino population. The growth of the Hispanic/Latino population has been increasing rather quickly; in 2000 the percentage was in the lower single digits. It is assumed that the population has increased to 43-45%; this assumption is based on school district numbers and college professors who have spoken/written about Hazleton and its Hispanic/Latino growth.

2. Determine the frequency with which LEP individuals come into contact the NRCS programs, activities, and services.

ARCIL has not encountered any language barriers with its current ridership which is predominately disabled or elderly. When we transport a Spanish speaking person, they will usually bring a bi-lingual friend/family member with them. If not, we do have 1 bi-lingual driver that they can ride with.

3. Determine the importance to LEP persons of your program activities and services

ARCIL provides an accessible van service for the Hazleton Area; while there is paratransit and shared ride programs available they can be limited to hours, days and area. The Hispanic/Latino disability community is underserved.

4. Determine the resource available to the recipient and costs.

ARCIL currently has three full time employees who are fluent in Spanish and have translated all of our material into Spanish and are currently working with our Spanish speaking consumers. In reference to our van service ARCIL also has one van driver who is fluent in Spanish. In reference to the Hispanic/Latino population there has and will be no added cost for ARCIL. Besides Spanish there are other languages spoken but on a much smaller level. In these cases, if needed, ARCIL will use Language Line, a telephone interpreter, which would be an added expense.

Limited English Proficiency Plan

Using the information gathered using the Four Factor Analysis it has been determined that there is a large population with Limited English Proficiency. The Hazleton Area has approximately 40+% population that speaks Spanish as their first language.

ARCIL predominately works with the disabled and elderly so the percentages may or may not be lower. Currently, in all of ARCIL's programs approximately 8% are Hispanic/Latino. ARCIL's van service is serving less than 1% of this population.

ARCIL's goal is to have the Hazleton Area become more aware of our services and ability to serve the Hispanic/Latino community. ARCL has three employees that are fluent in Spanish and has translated all of our information/brochures into Spanish. ARCIL has one driver who is fluent in Spanish, ARCIL would like to hire one driver, if possible, that is fluent in Spanish to help ARCIL become a needed asset to the Hispanic/Latino community.

ARCIL has one person who takes all of the calls pertaining to the van service and schedules all of the trips; when a Spanish speaking person wants to schedule we utilize our employees who speak Spanish to translate, The van scheduler will monitor and evaluate if more help is needed.

ARCIL does not have any formal training in place; with being a very small company it is commonly know that there is a Spanish speaking employee available to translate. All new hires will be informed of this and if needed they are to use them for translation.

Minority Population

ARCIL's van service program is an accessible van service but anyone can utilize our vans. People with disabilities often have a very limited means for transportation. Hazleton Area does have a paratransit but the hours are limited, they do not run at night, do not run on Sunday's or holidays. Paratransit also does not serve a large portion of the Hazleton Area. Shared Ride covers more territory but also has limited hours and days. ARCIL, Wheels on Wheels, will cover the entire Hazleton Area, will run trips out of the area, start early and end late, run seven (7) days a week and holidays, and this is all provided at a reasonable cost since most of the ridership is on a fixed income and cannot afford some of the other accessible services provided in the area; such as ambulance companies.

Planning Boards/Committees

ARCIL is a non-profit and is directed by a Board of Directors. ARCIL does not have an outside planning board, advisory council or committee. See Appendix A for letter from Lackawanna/Luzerne County Transportation.

Public Participation Plan

Currently, due to Covid-19, ARCIL's office is only open by appointment only. The CIL employees are the ones who interact with the public for the majority of the time. The Hazleton Area is just starting to hold public events and ARCIL does participate in many of the events. Listed are ways that ARCIL interacts and informs the community:

- Social Media
- Annual surveys
- Community Events
- Newspaper Advertising
- Use of the 211 system

ARCIL will keep a log of events, surveys, advertising and will review it annually to see if there is anything that can be added to keep the public informed.

Subrecipients

ARCIL does not use any outside vendors or contractors.

Facilities

ARCIL's van service is a door to door service; there is no facility for a rider to come to in order to schedule or get a ride. ARCIL's vans are stored, when not in use, at a local business' parking lot. This lot is a gated lot and is locked at night; not for public parking

LACKAWANNA COUNTY
Government Center at the Globe
123 Wyoming Avenue
Scranton, PA 18503

LACKAWANNA LUZERNE MPO

LUZERNE COUNTY
Penn Place
20 North Pennsylvania Ave
Wilkes-Barre, PA 18701

October 6, 2021

Denise Corcoran
Executive Director
Anthracite Region Center for Independent Living (ARCIL)
8 West Broad Street, Suite 228
Hazleton, PA 18201

Dear Ms. Denise Corcoran,

Please be advised that the Lackawanna-Luzerne Transportation Study Coordinated Public Transit-Human Services Transportation Plan is among a number of plans that the LLTS plans to update in the coming fiscal year. The current plan was completed in 2008 and does not accurately reflect the transportation network as it exists today.

Anthracite Region Center for Independent Living will be included in the updated plan as a service provider that supports gaps in service.

If you need anything else, please let me know.

Sincerely,



Chris Chapman
Luzerne County Transportation Planner
LLTS Technical Committee Member