



*Success Through Engagement & Partnership*

STEP TRANSPORTATION

TITLE VI PLAN

2021

## **Title VI Background**

STEP Transportation grants equal access to its programs and services to all citizens. This document serves to make customers and potential customers aware of their rights to such access, and serves to educate citizens so that they may understand the civil rights laws that protect their receipt and benefit of such services as defined by Title VI of the Civil Rights Act of 1964.

Title VI is a section of the Civil Rights Act of 1964 requiring 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." Note that Title VI does not address gender discrimination. It only covers race, color and national origin. Other Civil Rights laws prohibit gender discrimination.

### **STEP TRANSPORTATION TITLE VI COMPLAINT/INVESTIGATION PROCEDURES**

These procedures cover all complaints filed under Title VI of the Civil Rights Act of 1964 for alleged discrimination in any program or activity administered by STEP Transportation. These procedures do not deny the right of the complainant to file formal complaints with other State or Federal agencies or to seek private counsel for complaints alleging discrimination. Every effort will be made to obtain early resolution of complaints at the lowest level possible. The option of informal mediation meeting(s) between the affected parties and STEP may be utilized for resolution. Any individual, group of individuals or entity that believes they have been subjected to discrimination prohibited under Title VI and related statutes may file separate complaints.

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by STEP, Inc. Transportation (hereinafter referred to as "STEP, Inc.") may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form (see Appendix A). STEP, Inc. investigates complaints received no more than 180 days after the alleged incident. STEP, Inc. will process complaints that are complete.

Once the complaint is received, STEP, Inc. will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office.

STEP, Inc. has 60 days to investigate the complaint. If more information is needed to resolve the case, STEP, Inc. may contact the complainant. The complainant has 15 business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within 15 business days, STEP, Inc. can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

After the investigator reviews the complaint, she/he will issue one of two letters to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. An LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary

action, additional training of the staff member, or other action will occur. If the complainant wishes to appeal the decision, she/he has 10 days after the date of the letter or the LOF to do so.

1. If the Complainant is dissatisfied with STEP's resolution of the complaint, he/she has the right to file a complaint in the time allotted by law with:

**Federal Transit Administration Region 3**

**1760 Market Street Suite 500**

**Philadelphia, PA 19103-4124**

**(215) 656-7100 (telephone)**

**(215) 656-7260 (fax)**

## **POSTING OF PUBLIC NOTICE**

Public notice of Title VI Policy and Complaint Procedures is posted in each vehicle and at the STEP Administrative Offices, 2138 Lincoln Street, Williamsport, PA 17701.

## **LIMITED ENGLISH PROFICIENCY PLAN**

### *Background*

Pursuant to Federal Transit Administration (FTA) Circular C 4702.1A (May 13, 2007), which provides recipients and sub-recipients of FTA financial assistance with guidance and instructions necessary to carry out the U.S. Department of Transportation's (DOT's) Title VI regulations (49 CFR part 21) and to integrate into their programs and activities considerations expressed in the DOT's *Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons* (70 FR 74087, December 14, 2005), STEP Transportation has developed the following implementation plan.

### *Meaningful Access to LEP Persons*

Title VI and its implementing regulations require that FTA recipients take responsible steps to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are Limited English Proficient (LEP). Recipients and sub-recipients can ensure that LEP persons have meaningful access to their programs and activities by developing and carrying out a language implementation plan pursuant to the recommendations in Section VII of the DOT LEP Guidance.

## **INTRODUCTION**

Limited English Proficiency (LEP) is defined by the US Department of Transportation (DOT) as "individuals who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English." STEP Transportation has developed this LEP Plan to ensure LEP persons have meaningful access to STEP Transportation's programs, services, and activities.

STEP Transportation's LEP Plan was developed utilizing the Federal Transit Administration

Office of Civil Rights, April 13, 2007 handbook for Public Transportation Providers entitled “Implementing the Department of Transportation’s Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient (LEP) Persons.”

STEP Transportation is committed to ensuring that no person is excluded from participation in or denied the benefit of its services on the basis of race, color or national origin. This plan was prepared in accordance with Title VI of the Civil Rights Act of 1964: *National Origin Discrimination Against Persons with Limited English Proficiency* and Executive Order 13166: *Improving Access to Service for Persons with Limited English Proficiency (LEP)*.

## **SERVICE OVERVIEW**

STEP provides shared-ride service to all residents of Lycoming and Clinton counties. In addition to Lycoming and Clinton counties, STEP provides transportation to facilities in Columbia, Montour, Northumberland, Union, Snyder and Centre counties. The service area of coverage, in square miles, is three times the size of the state of Rhode Island, and 23% greater than the size of Rhode Island and Delaware combined.

## **PLAN SUMMARY**

STEP Transportation has developed this Limited English Proficiency Plan to help identify steps for providing language assistance to persons with limited English proficiency (LEP) who wish to access services provided by STEP Transportation.

This plan outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, staff training, how to notify LEP persons that assistance is available, and information for future plan updates.

Additionally, STEP Transportation has taken steps to further develop the plan in order to:

- Provide enhanced training to staff members
- Enhance accessibility of information to potential LEP individuals
- Increase dialogue between local Human Service organizations.

STEP Transportation uses the recommendations set forth in the DOT’s LEP guidance handbook which explains the four-factor framework for determining an appropriate mix of language assistance and how to prepare a language assistance implementation plan that is consistent with the DOT LEP Guidance. STEP Transportation understands that the information in this handbook is advisory and does not establish new requirements for FTA recipients or sub recipients.

STEP Transportation’s review and implementation of the four-factor analysis includes:

- **Factor 1:** The number and proportion of LEP persons eligible in STEP Transportation’s service area who may be served or who are likely to encounter STEP Transportation programs, activities and services.
- **Factor 2:** The frequency with which LEP persons come into contact with STEP Transportation’s programs, activities or services.
- **Factor 3:** The nature and importance of programs, activities or services provided by STEP

Transportation to the LEP population.

- **Factor 4:** The resources available and overall cost to provide LEP assistance.

## SUMMARY OF FOUR-FACTOR ANALYSIS

**Factor 1: The number and proportion of LEP persons eligible in STEP Transportation’s service area who may be served or who are likely to encounter our programs, activities, and services.**

For the LEP plan update, STEP Transportation reviewed demographic data for the State of Pennsylvania, Lycoming County, and Clinton County (which are the counties within STEP’s population service area).

STEP Transportation analyzed census data from the “2019 American Community Survey 5-Year Estimates” Language Spoken at Home by Ability to Speak English For the Population 5 years and over. For the Program Year July 1, 2020-June 30, 2021, this population universe represented \_\_% of STEP Transportation trips. While the percentage of LEP individuals is low in comparison to the total population, STEP Transportation will continue to review demographic data annually for any significant population changes that would merit changes to plan direction.

Based on the data analysis of all recorded languages, 1,572 individuals (1.1% or less) in STEP Transportation’s service area population speak English “Less than very well,” falling well below the state average for all languages as illustrated by the following table:

	Total Population	Speaks English “Less than Very Well”	Percent
State of Pennsylvania	12,106,328	542,607	4.00%
Lycoming County	113,299	855	0.08%
Clinton County	38,632	717	0.02%

Determining the concentration of a specific language other than English was derived by using data from the same table. The following Table shows English versus non-English along with the top eight languages other than English in STEP Transportation’s population service area.

This breakdown will allow us to target specific languages when determining the frequency with which LEP persons interact with STEP Transportation’s programs, activities and/or services.

**Table 2. Ability to Speak English by Language Spoken at Home for the Population 5 Years & Universe: Population 5 Years & Over**

**Geographic Area: Lycoming & Clinton Counties**

Language Spoken at Home	Speaks English "Very Well"		Speaks English "Not Very Well"		TOTAL	
	Number	Percent	Number	Percent	Number	Percent
Total Population	150,359	99%	1,572	1%	151,931	100.0
Speaks language other than English	4,820	79%	1,270	21%	6,090	4.0%
Spanish	1,652	80%	410	20%	2,062	1.0%
French	305	92%	26	8%	331	0.2%
German	474	82%	101	18%	575	0.4%
Other West Germanic Languages	800	58%	574	42%	1,374	0.9%
Russian	116	69%	53	31%	169	0.1%
Italian	229	98%	23	9%	252	0.2%
Urdu	153	100%	0	0%	153	0.1%
Chinese	87	51%	83	49%	170	0.1%

The following table illustrates a concentration of the top eight specific languages other than English within our population coverage area. The table was derived by using data from B16001, American Community Survey 2015-2020, Languages Spoken at Home by the Ability to Speak English for the Population 5 Years and Older. Using the Census data for Lycoming & Clinton Counties and the main population cities of Williamsport & Lock Haven. This analysis will allow us to target specific languages when determining the frequency with which LEP persons interact with STEP Transportation’s programs, activities and/or services.

Geographic Area	Total Population 5 Yrs. of Age and Older	% of Total Pop. 5 Yrs of Age and Older	Other West Gerrmanic							
			Spanish	French	Italian	German	Russian	Urdu	Chinese	
Combined Counties	144,334	95%	2,062	331	252	575	169	1,374	153	170
Lycoming	107,634	95%	1,709	266	225	375	74	261	144	118
Clinton	36,700	95%	353	65	27	200	95	1,113	9	52
City of Williamsport	26,777	95%	761	86	105	120	0	99	9	51
City of Lock Haven	8,602	95%	123	35	13	91	64	0	0	43

**Factor 2: The frequency with which LEP persons come into contact with STEP Transportation’s programs, activities or services.**

In October, 2021 STEP Transportation conducted a survey to assess the frequency with which LEP persons interact with our programs, activities or services. The following chart summarizes the LEP Exposure Compilation results:

Exposure				Outcome			
	Rarely	Occasionally	Frequently		Don't Know	Successful	Unsuccessful
<b>Spanish</b>	5	0	0	<b>Spanish</b>	0	5	0
<b>French</b>	0	0	0	<b>French</b>	0	0	0
<b>Italian</b>	0	0	0	<b>Italian</b>	0	0	0
<b>German</b>	0	0	0	<b>German</b>	0	0	0
<b>Russian</b>	0	0	0	<b>Russian</b>	0	0	0
<b>Polish</b>	0	0	0	<b>Polish</b>	0	0	0
<b>Urdu</b>	0	0	0	<b>Urdu</b>	0	0	0
<b>Chinese</b>	0	0	0	<b>Chinese</b>	0	0	0
<b>Unknown</b>	0	0	0	<b>Unknown</b>	0	0	0
<b>Total</b>	0	0	0	<b>Total</b>	0	0	0
%	10.00%	0.00%	0.00%	%	0.00%	100.00%	0.00%

The table illustrates the amount of encounters all levels of staff have experienced in the past year. Approximately 10% of staff has experienced an encounter with an identified LEP individual while providing service. This highlights the importance of the LEP plan, the plan's continued development, and staff training initiatives. Furthermore, over 100% of encounters were deemed to be successful utilizing established procedures.

Based on this staff survey, the Transportation Department will initiate a program utilizing Language Identification Materials to further ascertain and track the specific encounters and language(s) of the LEP population. This initiative will enable STEP TRANSPORTATION to review and continue to develop programs to address the needs of the LEP population.

**Factor 3: The nature and importance of programs, activities or services provided by STEP Transportation to the LEP population.**

The transportation services provided by STEP are high-need services that provide access for passengers to work, medical appointments, and shopping opportunities. Based on 2020-21 Ecolane Operating System Data, STEP Transportation Trip Purposes/Services were as follows:

STEP Transportation Trips-July 1, 2020-June 30, 2021		
Trip Purpose	# of Trips	% of Trips
<b>Education</b>	<b>145</b>	<b>0.2%</b>

<b>Shopping</b>	<b>1,657</b>	<b>2.6%</b>
<b>Work</b>	<b>8,234</b>	<b>13.0%</b>
<b>Medical</b>	<b>51,376</b>	<b>81.3%</b>
<b>Recreation</b>	<b>1,294</b>	<b>2.0%</b>
<b>Social Services/Visiting</b>	<b>73</b>	<b>0.1%</b>
<b>Senior Centers</b>	<b>390</b>	<b>0.6%</b>
<b>TOTAL TRIPS</b>	<b>63,169</b>	<b>100%</b>

Access to our services is critical to the LEP individual due to the locations and destinations that the system provides access to (i.e. employment centers, grocery stores, medical facilities, and shopping, social, and recreational facilities). We will continue to examine schedules, fare and payment information, system rules, ride guides, consumer complaint forms with the intent on developing/revising instruments that could be used to increase the LEP individual's access to our services.

STEP's Transportation Program utilizes Language Services Associates (LSA), (455 Business Center Drive-Suite 100, Horsham, PA 19044) for its Interpretive Services and Document Translation. This agreement allows us to provide interpretation services to assist LEP individuals obtain vital information about our system, which increases the independence of the individual and their trust within our service.

Additionally, Language Interpreter Identification Cards ("I speak" cards) are stored in each revenue vehicle and are utilized to provide information to the LEP individual and a guide of how to process the encounter for the Vehicle Operator. Efforts are made to coordinate and channel LEP individuals in need of translation services to Language Services Associates. In addition, language interpretive services posters/signs are posted on STEP vehicles and placed on our website directing LEP individuals to call our office if language services are needed.

**Factor 4: The resources available and overall cost to provide LEP assistance.**

STEP Transportation is committed to ensuring LEP persons have meaningful access to our programs, services and activities, and will devote the necessary resources to accomplish service goals. Our department will continue to monitor LEP populations and will provide language services on an as need basis.

Based on current data, Transportation will continue to focus on LEP persons whose primary language is Spanish; however, resources will be utilized for all eight languages referenced above.

As previously stated, STEP Transportation will continue to utilize LSA to provide professional interpreter/translation services. Further development of the LEP plan provides a mechanism for the Transportation Program to monitor LEP persons in its service area, define LEP needs, and implement LEP assistance.

**NON-ELECTED COMMITTEES AND COUNCILS**

STEP, Inc. is a Non-Profit Community Action Agency which is governed by a Board of Directors



which is comprised of 15 members. The representation is 1/3 Public Sector, 1/3 Private Sector, and 1/3 Low Income population representation. STEP Transportation does not appoint Board of director members nor any other committee or subcommittee members.

## **STEP TRANSPORTATION PUBLIC PARTICIPATION PLAN**

STEP Transportation has thoroughly reviewed the established LEP Plan, and is preparing to further develop the plan to provide more education to staff, human service organizations, and businesses that may service a high population of LEP individuals.

To ensure proper and effective communication, STEP Transportation has reviewed all documentation, procedures, and processes concerning the LEP Plan. Therefore, after careful review, STEP Transportation has committed to the following initiatives to further develop the LEP Plan and assist individuals in accessing and effectively utilizing our services.

### **1. Plan notification methods:**

- a. Revise Title VI Notification, Complaint Procedures, and Complaint Form to account for staff changes.
- b. Developed a dedicated link on company website for Title VI information, enabling easier access to vital information.
- c. Distributing Title VI information and LEP Plan to local Human Service organizations to assist in providing notifications directly to population in need (see section entitled Dissemination of STEP TRANSPORTATION's LEP Plan).
- d. Post information at STEP Transportation office locations.
- e. Utilize Notification posters in the interior of transit vehicles.
- f. Revised "I Speak" cards have been distributed to all transit vehicles - include the seven (7) most spoken foreign languages (as determined through census data) and contact information for STEP TRANSPORTATION Customer Service. LEP individual will be asked to identify preferred language and then to contact STEP TRANSPORTATION customer Service for further assistance.
- g. Revised "I Speak" cards for Dispatch- revised cards detail LEP procedures; as well as, contain contact information and process for contacting Language Service Associates.

### **2. Language Assistance Measures**

- a. Develop schedule of Information Sessions that target Human Service organizations to provide information about our system and services, including the LEP Plan. STEP will coordinate with Human Service organizations to obtain information regarding contact with LEP individuals to tailor service strategies. Language assistance tools will be provided to Human Service organizations for more direct distribution to LEP individuals as appropriate, Information Session to be scheduled twice per year.
- b. Obtain translation of vital documents for distribution as needed that include:
  - Title VI Notification
  - Complaint Procedures
  - Complaint Form
  - Description of Services
- c. Utilize local businesses to distribute LEP materials and information regarding STEP Transportation services in preferred languages.

- Human Service Organizations
  - James V. Brown and the Ross Public Library
  - Lycoming & Clinton County Offices of the PA Department of Human Service Transit Centers
- d. Work with the Lycoming County Metropolitan Planning Organization for public outreach on all transit initiatives.
  - e. Survey operators, dispatchers, maintenance, administrators and customer service staff annually on their experience and contact with LEP persons during the previous year.
  - f. Review service materials for increasing symbolic signs.
3. Staff Training
    - a. Revised LEP procedures, process, roles, and responsibilities (see Appendix E).
    - b. Enhanced training- STEP Transportation staff will conduct LEP training for front line employees (see Appendix F). The training consisted of a review of revised process and procedures, a video entitled: During the training, employees will discuss an LEP encounter and the importance of following each step of the process. It is believed that staff will benefit by reviewing the entire process from beginning to end so they can understand their role is in identifying and then referring the encounter to the proper staff.
    - c. Incorporate new training materials referenced above into new employee orientation plan.
  4. Monitoring and updating the LEP plan
    - a. Development of a LEP encounter tracking tool to document LEP encounters and provide analytical information that can be used to better service LEP individuals. This document will be reviewed on a quarterly basis.
    - b. Revised LEP procedures, process, roles, and responsibilities based on LEP encounter survey data.
    - c. Implement Information Sessions to target local Human Service organizations to more effectively provide information regarding our system, services, and programs to LEP individuals.
      - i. Developed outline for Information Sessions (see section entitled Dissemination of STEP Transportation's LEP Plan)
    - d. Annually review & update demographics.
      - Change and/or concentration in LEP population
    - e. Annually review & update plan.
      - i. Evaluate plan- based upon LEP encounters survey
        - Determine if needs of LEP have been addressed;
        - Determine if needs of LEP services have changed
        - Determine financial resources
        - Determine whether complaints have been received relative to the needs of LEP individuals.
  5. Monitor changes and update the LEP plan where appropriate.

## **DISSEMINATION OF STEP TRANSPORTATION'S TITLE VI/LEP PLAN**

STEP Transportation's LEP Plan, Title VI Policy, and complaint form will be included on the

STEP Transportation website at [stepcorp.org](http://stepcorp.org).

Additionally, this LEP Plan will also be shared with human service organizations in its service area. These organizations, listed below, will be targeted for Information Sessions, which are designed to provide information about STEP Transportation's system, services, and programs to more effectively and efficiently distribute vital information to end users and LEP individuals.

- Roads to Freedom/Center for Independent Living
- North Central Sight Services
- STEP Area Agency on Aging
- STEP Service Navigation
- Hope Enterprises
- Community Services Group
- River Valley Health & Dental Clinic
- Lycoming College
- Pennsylvania College of Technology
- Lycoming County Assistance Office
- Clinton County Assistance Office
- Housing Authority of Lycoming County
- Clinton County Housing Authority

The information sessions will be offered to additional agencies as identified. Any person or agency with internet access will be able to access and download the plan from STEP Transportation's website. Alternatively, any person or agency may request a copy of the plan via telephone, fax, mail, or in person, and shall be provided a copy of the plan at no cost.

Finally, a Statement of Notification will be posted at the following STEP Transportation locations:

STEP Transportation-Administrative Offices  
2138 Lincoln Street  
Williamsport, PA 17701

STEP Transportation-Operation Center  
Clinton County Community Center  
124 East Walnut Street  
Lock Haven, PA 17745

Questions or comments regarding the LEP Plan may be submitted to STEP TRANSPORTATION's Program Manager:

Dan Merk, Transportation Manager  
STEP Transportation  
2138 Lincoln Street  
Williamsport, PA 17701  
Telephone: (570) 601-9675

## APPENDIX A

Title VI Investigations  
Notice to Public and Complaint Procedures  
Title VI Complaint Form  
“I Speak” Card  
Office Procedures

**STEP TRANSPORTATION TRANSIT-RELATED TITLE VI  
INVESTIGATIONS, COMPLAINTS & LAWSUITS**

**Program Years:**

1. July 1, 2018-June 30, 2019
2. July 1, 2019-June 30, 2020
3. July 1, 2020-June 30, 2021

Nature	Date (Month, Day, Year)	Summary (Basis of Complaint: Race, Color, or National Origin)	Status	Action(s) Taken
<b>Investigations</b>				
1. N/A				
2.				
<b>Lawsuits</b>				
1. N/A				
2.				
<b>Complaints</b>				
1. N/A				
2.				

**STEP, Inc. Transportation  
PUBLIC NOTICE**

**STEP, Inc. Transportation Program Title VI Statement of Policy and Public Notice**

STEP, Inc. Transportation Program assures full compliance with Title VI of the Civil Rights Act of 1964, as amended and its 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 they have individually, or as a member of any specific class of persons, has been unlawfully discriminated against may file a formal complaint with STEP, Inc. within 180 days following the date of the alleged incident.

For more information regarding civil rights complaints, please contact:

**Ms. Jean M. Myers**  
**Human Resources Operations Director**  
STEP, Inc.  
2138 Lincoln Street  
Williamsport, PA 17701  
Phone: 570-601-9522  
Fax: 570-601-9517  
Email: [jimmyers@stepcorp.org](mailto:jimmyers@stepcorp.org)



*Success Through Engagement & Partnership*

# **STEP, Inc. Transportation**

## **Title VI Complaint Procedure**

STEP Transportation grants equal access to its programs and services to all citizens. This document serves to make customers and potential customers aware of their rights to such access, and serves to educate citizens so that they may understand the civil rights laws that protect their receipt and benefit of such services as defined by Title VI of the Civil Rights Act of 1964.

**WHAT IS TITLE VI?** Title VI is a section of the Civil Rights Act of 1964 requiring 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." Note that Title VI does not address gender discrimination. It only covers race, color and national origin. Other Civil Rights laws prohibit gender discrimination.

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Once the complaint is received, STEP, Inc. will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office.

STEP, Inc. has 60 days to investigate the complaint. If more information is needed to resolve the case, STEP, Inc. may contact the complainant. The complainant has 15 business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within 15 business days, STEP, Inc. can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

After the investigator reviews the complaint, she/he will issue one of two letters to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. An LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member, or other action will occur. If the complainant wishes to appeal the decision, she/he has 10 days after the date of the letter or the LOF to do so.

1. If the Complainant is dissatisfied with STEP's resolution of the complaint, he/she has the right to file a complaint in the time allotted by law with:

**Federal Transit Administration Region 3**

**1760 Market Street Suite 500**

**Philadelphia, PA 19103-4124**

**(215) 656-7100 (telephone)**

**(215) 656-7260 (fax)**

#### **POSTING OF PUBLIC NOTICE**

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# STEP, Inc. Transportation

## Title VI Complaint Form

**STEP, Inc. Transportation** Title VI Complaint Procedure is made available in the following locations:

- Agency website, either as a reference in the Notice to Public or in its entirety
- Hard copy in the central office
- Available in appropriate languages for LEP populations, meeting the Safe Harbor Threshold.
- Other, \_\_\_\_\_

<b>Section I:</b>				
Name:				
Address:				
Telephone (Home):			Telephone (Work):	
Electronic Mail Address:				
Accessible Format Requirements?	Large Print		Audio Tape	
	TDD		Other	
<b>Section II:</b>				
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
<b>Section III:</b>				
I believe the discrimination I experienced was based on (check all that apply):				
[ ] Race                      [ ] Color                      [ ] 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.				
_____				
_____				
_____				
<b>Section IV:</b>				
Have you previously filed a Title VI complaint with this agency?			Yes	No

<b>Section V:</b>	
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: _____	
<b>Section VI:</b>	
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:

Jean M. Myers  
Human Resources Operations Director  
**STEP, Inc.**  
2138 Lincoln Street  
Williamsport, PA 17701  
Email: [jmmyers@stepcorp.org](mailto:jmmyers@stepcorp.org)  
Phone: 570-601-9522  
Fax: 570-601-9517



## LANGUAGE IDENTIFICATION GUIDE

*A useful guide to help diverse patients identify their primary language*

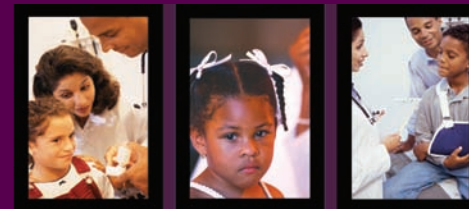


760 Alexander Road, Princeton, NJ 08543-0001 | [www.njha.com](http://www.njha.com)

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# I SPEAK ...



**ARABIC** أنا أتحدث اللغة العربية

**ARMENIAN** Ես խոսում եմ հայերենի

**BENGLI** আমি বাংলা কথা বলতে পারি

**BOSNIAN** Ja govorim bosanski

**BULGARIAN** Аз говоря български

**BURMESE** ကျွန်တော်/ကျွန်မ မြန်မာလို ပြောတတ်ပါတယ်။

**CAMBODIAN** ខ្ញុំនិយាយភាសាខ្មែរ

**CANTONESE (CHINESE)** 我講廣東話  
我讲广东话

**CROATIAN** Govorim hrvatski

**CZECH** Mluvím česky

**DUTCH** Ik spreek het Nederlands

**FARSI (PERSIAN)** من فارسی صحبت می کنم

**FRENCH** Je parle français

**FRENCH CREOLE**  
(HAITIAN CREOLE) M pale kreyòl ayisyen

**GERMAN** Ich spreche Deutsch

**GREEK** Μιλώ τα ελληνικά

**GUJARATI** ુ ગુજરાતી બોલુ છુ

**HEBREW** אני מדבר עברית

**HINDI** मैं हिंदी बोलता हूँ ।

**HMONG** Kuv has lug Moob

**HUNGARIAN** Beszélek magyarul

**ITALIAN** Parlo italiano

**JAPANESE** 私は日本語を話す

**KOREAN** 한국어 합니다

**LAOTIAN** ຂ້ອຍປາກພາສາລາວ

**LITHUANIAN** Aš kalbu lietuviškai

**MANDARIN (CHINESE)** 我講國語  
我讲国语/普通话

**NORWEGIAN** Jeg snakker norsk

**POLISH** Mówi' po polsku

**PORTUGUESE** Eu falo português do Brasil (Brasil)

Eu falo português de Portugal (Portugal)

**PUNJABI** ਮੈਂ ਪੰਜਾਬੀ ਬੋਲਦਾ/ਬੋਲਦੀ ਹਾਂ।

**ROMANIAN** Vorbesc românește

**RUSSIAN** Я говорю по-русски

**SERBIAN** Ja говорим српски

**SLOVAK** Hovorím po slovensky

**SPANISH** Yo hablo español

**SWAHILI** Ninaongea Kiswahili

**SWEDISH** Jag talar svenska

**TAGALOG** Marunong akong mag-Tagalog

**THAI** พูดภาษาไทย

**TURKISH** Türkçe konuşurum

**UKRAINIAN** Я розмовляю українською мовою

**URDU** میں اردو بولتا ہوں

**VIETNAMESE** Tôi nói tiếng Việt

**YORUBA** Mo nso Yooba

\* Registrars should use this tool to guide patients in identifying their spoken language when they do not speak English at all.

SOURCE: Adapted from the State of Ohio's Office of Criminal Justice Services and recommended by the US Department of Health and Human Services - Office of Civil Rights for use by healthcare facilities

## **LEP OPERATIONAL PROCEDURES**

In order to make transportation service available to non-English speaking residents, STEP Transportation contracts with Language Services Associates to utilize the Interpreter Translation Services. This service is available 24/7/365 and provides access to over 230 languages for translation.

In all cases, STEP Transportation staff need to be keenly aware of the process to provide assistance to customers with Limited English Proficiency (LEP). The following is the process for all Transportation staff to follow:

### **Operator(Driver)**

- A. Identify need of LEP individual
  - Person is unable to speak or understand English “well”
- B. Utilize “I Speak Card” to obtain preferred language of LEP individual
- C. Inform passenger that they need to contact main office for assistance
  - Point to STEP Transportation Phone # on “I Speak Card”
- D. Contact main office to inform them that LEP individual will be contacting them
  - Alert them of preferred language requested by LEP individual

### **Office Staff**

- A. Obtain information from Operator(Driver)
  - Preferred language of LEP individual
- B. Once contacted by LEP individual, contact Language Service Associates.
- C. When greeted by a Coordinator, identify that you are calling from STEP, Inc and provide our account code
  - Please request that LEP individual “hold for assistance”
- D. Identify what language you need or ask for assistance in identifying the language
- E. Hold momentarily while your interpreter is connected. Once on the line, you will be notified and provided with the interpreter’s ID number
- F. Explain the objective of the call to the interpreter. Then proceed by speaking directly to the Limited English Proficient speaker in the first person.

Upon completion of the call, all parties should simply hang up. The time will automatically be recorded. It is important for staff to be patient during the process. It can be time consuming depending upon the customers understanding of the process.

## APPENDIX B

### **List of Local Human Service Organizations**

## **STEP Transportation Community Outreach Partners**

**The following organizations are Transportation Partners who will be involved in the community outreach process. It is anticipated that other agencies will be added as identified.**

Bucktail Medical Center  
Behavior Specialists Inc. (BSI)  
Center for Independent Living  
Clinton County Commissioners  
Clinton County Community Center  
Clinton County Department of Human Services  
Clinton County Planning Department  
Community Services Group  
Embassy of Loyalsock  
Elmcroft Assisted Living  
Fullmer's Personal Care Home  
Geisinger Medical Center Danville  
Geisinger-Jersey Shore Hospital  
Haven Skilled Nursing  
Hillside Assisted Living  
Hope Enterprises  
Insinger's Personal Care Facilities  
Jersey Shore Manor Care  
Liberty Manor  
Lock Haven Dialysis  
Lock Haven Taxi  
Lycoming County Commissioners  
Lycoming County Department of Human Services  
Lycoming-Clinton Mental Health/Intellectual Disabilities  
Montoursville Dialysis  
Muncy Skilled Nursing  
North Central Sight Services  
River Valley Health & Dental  
River Valley Transit  
Rose View Court  
Roseview Nursing Center  
SEDA-COG MPO  
Skills Group  
STEP Area on Aging  
STEP Head Start  
STEP Service Navigation  
The Meadows Nursing Facility  
Tilburg's  
United Disabilities Services  
UPMC - Lock Haven  
UPMC - Williamsport

Valley View Nursing Center  
Williamsport Area Transportation Study(WATS) MPO  
Williamsport Dialysis  
Williamsport Family Medicine  
Williamsport North Nursing & Rehabilitation Center  
Williamsport South Nursing & Rehabilitation Center



## APPENDIX C

### **Title VI Training Presentation**



*Success Through Engagement & Partnership*

# Transportation Title VI Training

# Title VI Overview

- Civil Rights Act of 1964
- Prohibits discrimination of persons based on:
  - Race
  - Color
  - National Origin
- Applies to any Transportation Program receiving Federal financial assistance
  - Institution-wide application Federal requirement

# Title VI Requirements

- Notify public of rights
- Establish and publicize program procedures and complaint process/form
- Document and report transit-related Title VI investigations, complaints, and lawsuits
- Promote public participation
- Limited English Proficiency (LEP) plan
  - Census data
- Develop system standards and policies

# LEP 2015-2020 Census numbers Lycoming & Clinton County

- According to American Community Survey, there are a total of 144,334 persons in Lycoming & Clinton County aged five years and older. A total of 1,556 persons (.011%) speak a primary language at home other than English and speak English less than very well. Lycoming & Clinton County is lower than the statewide percent of 4.00% primary non-English-speaking population. This LEP population breakdown for Lycoming & Clinton County is illustrated below.

# Four Factor Analysis

- Goal is to provide meaningful access to the benefits, services, information and other important portions of programs and activities to LEP persons.
- What are the four factors?

1. The number and proportion of LEP persons served in the eligible population.

STEP has determined that number to be less than 2% based on census data.

2. The frequency with which LEP individuals come into contact with the program.

Via surveys of operators and staff STEP has determined it to be “rare.”

# Four Factor Analysis

- Goal is to provide meaningful access to the benefits, services, information and other important portions of programs and activities to LEP persons.
- What are the four factors?
  3. The nature and importance to people's lives of the program, activity or service provided.

STEP provides transportation services for more than 3,000 passengers annually. To assist LEP persons STEP has 47 vehicles equipped with bi-lingual interior signage. We do not believe any language barriers exist that prevent LEP persons from benefitting from our services.

4. The resources available to the recipient for LEP outreach and associated costs. Translation services upon advanced notification, LEP translation services through Language Service Associates. STEP Transportation will continue to monitor LEP requests .

# LEP Procedures – Operator

- Identify need of LEP individual
  - Person is unable to speak or understand English “well”
- Utilize “I Speak Card” to obtain preferred language of LEP individual
- Inform passenger that they need to contact main office for assistance
  - Point to STEP Transportation Phone # on “I Speak Card”
- Contact main office to inform them that LEP individual will be contacting them
  - Alert them of preferred language requested by LEP individual



# LEP Procedures – Office Staff

- Obtain information from Operator
  - Preferred language of LEP individual
- Once contacted by LEP individual, contact Language Service Associates
  - Please request that LEP individual “hold for assistance”
- Identify you are calling from STEP Transportation, provide your name and phone # and provide “Customer Code”
- Identify what language you need, or ask for assistance
- Hold until connected. Once on the line, you will be provided with the interpreter’s ID number
- Explain the objective of the call. Then proceed.