



**Title VI of the Civil Rights Act of 1964  
And Related Statutes**

**2018 – 2021 Implementation Plan**

**In accordance with  
Federal Transit Administration  
and the  
Metropolitan Washington Council of Governments (“COG”)**

**For**

**Woodley House, Inc.  
6856 Eastern Ave., NW Suite 300  
Washington, DC 20012**

**Adopted date: March 12, 2018**

**Revised date: March 27, 2019**

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## **I. INTRODUCTION**

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

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

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

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

This document details how Woodley House, Inc. incorporates nondiscrimination policies and practices in providing services to the public, in accordance with Contract No 17-055, a Sub-grant between COG and Woodley House, Inc. for Van Acquisition Project.

## II. OVERVIEW OF SERVICES

Woodley House is an innovative, community-based organization dedicated to helping people with mental illness live full and healthy lives with dignity. Founded in 1958, Woodley House has served as a pathway to recovery for thousands of Washington, DC area residents by offering safe, affordable housing options and a comprehensive range of services and support. We offer nurturing homes with a family-style environment in residential neighborhoods conducive to recovering. Serving more than 300 adults each year, we are committed to empowering our clients -- on an individual basis -- to achieve productive, independent living.

Crossing Place is our 8-bed short-term crisis home, located in the Woodley Park area, and professionally staffed 24/7 with part-time psychiatric and nursing assistance, for individuals who need intensive supervision for stays of up to 14 days as an alternative to hospitalization.

Valenti House, our 20-bed flagship home, is professionally staffed 24/7, also in the Woodley Park area, and provides longer term supportive housing for men and women with mental illness.

Holly House, our 8-bed group home, professionally staff 24/7, located in the Shepard Park neighborhood, provides permanent supportive housing for chronically homeless adults with mental illness.

Our Supported Independent Living Apartment Program provides shared apartments located throughout the city for adults with mental illness, who no longer need 24/7 supervision, yet require affordable housing with supportive services to help them maintain their independence.

Our Life Skills Training Program offers a critical lifeline for people living with severe mental illness who are re-entering community living. It teaches basic skills that have become diminished due to their illness, such as personal hygiene, maintaining a home, communication, money management, nutrition, medication compliance and job readiness. Skills Training Specialists work with residents on a one-to-one basis and in small groups, depending on individual needs.

Our Food Pantry provides access to free food staples for Woodley House residents and our DC Neighbors-in-need. Open every Tuesday afternoon, it is conveniently located at our Valenti House location close to the Metro and public transportation.

**Transportation Services:** Woodley House provides transportation services only for current residents who are unable to meet their transportation needs through existing public transportation, para-transit services, or Core Service Agencies. Woodley House has up to 90 residents in its residential programs at any given time, and must provide transportation in the event of an emergency and for disaster preparedness. On occasion, group activities are scheduled for which Woodley House provides transportation for its residents. Transportation is provided to fill gaps and needs for its current residents that are not otherwise met through existing transportation services. Transportation is not provided for the general public.

### III. POLICY STATEMENT AND AUTHORITIES

#### Title VI Non-Discrimination Policy Statement

Woodley House, Inc. is committed to ensuring that no person shall, on the grounds of race, color, national origin, age, disability, or gender be excluded from participation in, or be denied the benefits of, or otherwise be subjected to discrimination under any program or activity, whether those programs and activities are federally funded or not (as required by Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987 (PL 100.259), and related nondiscrimination statutes).

Woodley House, Inc.'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

\_\_\_\_\_  
March 27, 2019

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, FTAMA 13 (October 1, 2006); and, DCMR Title 22§3400.

#### **IV. NONDISCRIMINATION ASSURANCE TO COG**

In accordance with 49 CFR Section 21.7(a), every application for financial assistance from FTA must be accompanied by an assurance that the applicant will carry out the program in compliance with the FTA's Title VI regulations. This requirement is fulfilled when COG submits its annual certifications and assurances to FTA. COG shall collect Title VI assurances from sub-recipients prior to passing through FTA funds.

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

In signing and submitting this assurance, Woodley House, Inc. confirms to COG our commitment to nondiscrimination and compliance with federal and state requirements.

#### **V. PLAN APPROVAL**

I hereby acknowledge receipt of the Woodley House, Inc. Title VI Implementation Plan 2018-2020. 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 Woodley House, Inc. services on the basis of race, color, disability, age, gender, or national origin, as protected by Title VI according to FTA Circular 4702.1B, Title VI requirements and guidelines for Federal Transit Administration sub-recipients.



Signature of Authorizing Official

March 27, 2019

DATE

Ann Chauvin  
Executive Director/CEO  
Woodley House, Inc.

**APPENDIX A-BOARD OF TRUSTEES MINUTES APPROVING TITLE VI PROGRAM.**

## **VI. TITLE VI ORGANIZATION AND PROGRAM RESPONSIBILITIES**

As authorized by the Board of Trustees of **Woodley House, Inc.**, the **Executive Director/CEO** will serve as the Title VI Manager and be responsible for ensuring implementation of the agency's Title VI program. The specific areas of responsibility are described below.

### **Overall Organization for Title VI**

The Title VI Manager is 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 training programs on Title VI and other related statutes for agency employees.
4. Disseminate Title VI information to agency employees and program participants and, where appropriate, in languages other than English.
5. Identify and report discrimination or discriminatory practices to Authorizing Official.

### **General Title VI responsibilities of the agency**

The Title VI Manager is responsible for ensuring the aforementioned elements of the plan are appropriately implemented and maintained, and for coordinating with those responsible for service planning and delivery.

#### **1. Data collection**

To ensure that Title VI reporting requirements are met, Woodley House, Inc. will maintain:

- A log of Title VI complaints received that tracks the investigation of and response to each complaint.

#### **2. Annual Report and Updates**

As a sub-recipient of FTA funds, Woodley House, Inc. is required to submit a log, as part of its Quarterly Report to COG that documents any Title VI complaints received during the preceding quarter and annually.

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

- Any Title VI compliance reviews conducted in the last three (3) years, along with the purpose or reason for the review, the name of the organization that performed the review, a summary of findings and recommendations, and a report on the status or disposition of the findings and recommendations;
- Limited English Proficiency (“LEP”) plan;
- Procedures for tracking and investigating Title VI complaints;
- List of Title VI investigations, complaints or lawsuits filed with the agency since the last submission; and
- Copy of the agency’s notice to the public that it complies with Title VI and instructions on how to file a discrimination complaint.

### **3. Annual review of Title VI program**

Each year, the Title VI Manager will review the agency’s Title VI program to ensure compliance with 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 Woodley House Inc.’s Title VI program will be disseminated to agency employees, contractors, and beneficiaries, according to Federal and state laws/regulations. The Title VI program will be available in other languages when needed according to the LEP plan. Title VI and non-discrimination information will be provided to all Woodley House clients at the time of intake along with information on Consumer Rights and Responsibilities, and Consumer Grievance Procedures, including Title VI rights and complaints.

### **5. Resolution of complaints**

Any individual may exercise his or her right to file a complaint if that person believes that he, she or any other program beneficiaries have been subjected to unequal treatment or discrimination in the receipt of benefits/services, as prohibited by non-discrimination requirements. Woodley House, Inc. will report Title VI complaints to COG within three (3) business days (per COG requirements), and make a concerted effort to resolve complaints locally using the agency’s Title VI Complaint Procedures. All Title VI complaints and their resolution will be logged as described



under Section 1. Data collection will be reported to COG in the Quarterly Report (in addition to immediately).

## **6. Written policies and procedures**

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

## **7. Internal Education**

Woodley House, Inc.'s employees receive orientation and annual training on Consumer Rights and Non-Discrimination policies under a variety of Federal and state regulations. Obligations to ensure non-discrimination based on race, color, national origin, disability, gender, age, or other covered conditions, including LEP requirements under Title VI policies and procedures, are included in training upon hiring and annually thereafter.

## **8. Title VI clauses in contracts**

In all federal procurements requiring a written contract or Purchase Order (PO), Woodley House Inc.'s contract/PO will include appropriate non-discrimination clauses. The Title VI Manager will work with the **Director of Finance and/or Director of Residential Services** who are responsible for procurement contracts and PO's to ensure appropriate non-discrimination clauses are included.

## **VII. GENERAL REPORTING REQUIREMENTS**

### **1. 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 FTA's Title VI regulations and apprise members of the public of the protections against discrimination afforded to them by Title VI. At a minimum, Woodley House, Inc. shall disseminate this information to the public by:

- Title VI notice on the agency's website;
- Title VI notice posted in public areas of the agency's offices, including reception areas, common areas, and bulletin boards;
- Title VI notice included in referral and intake documents;
- Title VI notice posted in federally-funded vehicles.

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

## **2. REQUIREMENT TO DEVELOP TITLE VI COMPLAINT PROCEDURES AND TITLE VI COMPLAINT FORM.**

In order to comply with the reporting requirements established in 49 CFR Section 21.9(b), Woodley House has developed procedures for investigating and tracking Title VI complaints and procedures for filing a complaint available to all Woodley House clients. Woodley House has developed a Title VI complaint form and has made that form available through its Consumer Grievance Procedures. Woodley House does not provide transportation services to the general public, therefore only residents or potential residents of Woodley House require access to the complaint procedures. The form and procedures for filling a complaint are made available on the Woodley House website, as well as to all Woodley House consumers upon referral, during the intake process, and at any other time through the Consumer Grievance procedures.

**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.**

### Procedures for Handling and Reporting Investigations/Complaints and Lawsuits

For any Title VI investigations, initiated by FTA or COG, or any Title VI complaints/lawsuits filed with Woodley House, Inc., the agency will follow these procedures:

1. Any individual, group of individuals or entity that believes they have been subjected to discrimination on the basis of race, color, or national origin may file a written complaint with the Title VI Manager in the following manner:
  - a. A formal complaint must be filed within 180 calendar days of the alleged occurrence.
  - b. The complaint should include:
    - the complainant's name, address, and contact information (i.e., telephone number, email address, etc.);
    - the date(s) of the alleged act of discrimination (if multiple days, include the date when the complainant(s) became aware of the alleged discrimination and the date on which the alleged discrimination was discontinued or the latest instance);
    - a description of the alleged act of discrimination;
    - the location(s) of the alleged act of discrimination (include vehicle number if appropriate);
    - an explanation of why the complainant believes the act to have been discriminatory on the basis of race, color, and national origin;
    - if known, the names and/or job titles of those individuals perceived as parties in the incident;
    - contact information for any witnesses; and
    - an indication of any related complaint activity

- c. The complaint form shall be submitted to the Title VI Manager at 6856 Eastern Ave., NW, Suite 300, Washington, DC 20012 either in person or by mail.
2. 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.
3. Upon receipt of the complaint, the Title VI Manager will immediately:
  - a. notify COG (no later than three (3) business days from receipt);
  - b. notify Gary Frye, CEO, Authorizing Official; and
  - c. ensure that the complaint is entered in the complaint database.
4. Within three (3) business days of receipt of the complaint, the Title VI Manager will contact the complainant by telephone to set up an interview.
5. 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.
6. If COG has assigned staff to assist with the investigation, the Title VI Manager will offer an opportunity to participate in the interview.
7. The alleged discriminatory service or program official will be given the opportunity to respond to all aspects of the complainant's allegations.
8. The Title VI Manager will determine, based on relevancy or duplication of evidence, which witnesses will be contacted and questioned.
9. The investigation may also include:
  - a. investigating Woodley House service records, policies or procedures;
  - b. reviewing Residential program policies and procedures;
  - c. reviewing requests and approval records for subject trip; and
  - d. observing behavior of the individual whose actions were cited in the complaint.
10. All steps taken and findings in the investigation will be documented in writing and included in the complaint file.
11. The Title VI Manager will contact the complainant at the conclusion of the investigation and give the complainant an opportunity for rebuttal at the end of the investigation process.
12. At the conclusion of the investigation and within 60 days of the interview, the Title VI Manager shall prepare a report that includes a narrative description of the incident, identification of persons interviewed, and recommendations for disposition. This report will be provided to the Authorizing Official, COG, and if appropriate legal counsel.
13. 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 to correct the situation. If the complaint is determined to be unfounded, the letter will explain the reasoning, and refer the complainant to COG to appeal the determination. This letter will be copied to COG.
14. 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; and
- c. The complainant fails to respond to repeated requests for additional information needed to process the complaint.

#### **APPENDIX C - TITLE VI COMPLAINT FORM**

##### **3. REQUIREMENT TO PROVIDE TITLE VI INVESTIGATIONS, COMPLAINTS, AND LAWSUITS**

All recipients shall prepare and maintain a list 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;
- Complaints filed with the recipient; and,
- Lawsuits naming the recipient.

This list shall include the date that the transportation-related Title VI investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by the recipient in response, or final findings related to the investigation, lawsuit, or complaint. This list shall be included in the Title VI Program submitted to COG every three years (3) and new information regarding complaints, lawsuits, or investigations shall be provided to COG with the Quarterly Report.

#### **APPENDIX D -- INVESTIGATIONS, LAWSUITS AND COMPLAINTS REPORT**

#### **4. REQUIREMENT TO PROVIDE PUBLIC OUTREACH AND INVOLVEMENT**

Woodley House, Inc. is not a fixed route, public transit provider. Transportation services are, provided only to Woodley House residents who are Seniors or Individuals with Disabilities, through the Section 5310 Enhanced Mobility Program, with Federal funding from the FTA, administered by COG. As such, requirements for Public Outreach and Involvement and a Public Participation Plan are not applicable to the transportation services provided by Woodley House.

Woodley House does, however, involve public participation in providing services offered to seniors and individuals with disabilities through a variety of means, such as inclusion of a Woodley House Program Representative on its Board of Trustees, participation in DC Department of Behavioral Health provider forums and outreach, Capital Area Food Bank partnership and participation, hosting meetings of residents for feedback on needs and services provided, and conducting consumer satisfaction surveys with results provided to the Board of Trustees and DC DBH, to maintain certifications for human care agreements with the District government.

Woodley House is a provider of Mental Health Rehabilitation Services and Supported Residential Services through the DC Department of Behavioral Health, the US Department of Housing and Urban Development, the US Veteran's Administration, AmeriHealth (DC Medicaid provider), and private mental health service providers. Woodley House is required to maintain policies and procedures<sup>1</sup>, which are reviewed annually, to ensure the public's rights and participation in Woodley House services. Below is the list of relevant policies:

- Anti-Discrimination (#5);
- Complaint and Grievance Procedures (#9);
- Client Rights and Choice Policies (#26);
- Consumer Abuse and Neglect Policy (#1);
- Corporate Compliance Plan (#13);
- Continuity of Operations Plan and Disaster Preparedness Plan (#20);
- Quality Improvement Policy (#33);
- Cultural Competency Policy (#18), and Interpreter Policy (#22).

The above policies and practices<sup>2</sup> also apply to Woodley House obligations, as required by Title VI of the Civil Rights Act of 1964, to utilize effective means of providing information and receiving public input on services provided from low income, minority and limited English proficient ("LEP") populations.

In accordance with DC and Federal regulations, Woodley House must take reasonable steps to ensure that LEP persons have meaningful access to 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. Woodley House will make these determinations based on a demographic analysis of the population(s) affected, individual

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<sup>1</sup> In accordance with DCMR Title 22 §3410, MHRS Certification Standards.

<sup>2</sup> Available upon request or on-site visit.

needs of clients, the type of program and/or service under consideration, and the resources available. Efforts to involve minority and LEP populations in services and activities include measures, such as providing targeted services to address linguistic, institutional, cultural, economic, historical, or other barriers that may prevent minority and LEP individuals from effectively participating in our programs.

EFFECTIVE OUTREACH PRACTICES:

- Determine and identify meetings and activities that lend themselves to client participation.
- Scheduling meetings at times and locations convenient for minorities/LEP clients.
- Employing different meeting sizes and formats, to include one-on-one and groups.
- Coordinating with Core Service Agencies and DC Government agencies to implement strategies that specifically reach members of affected minority/LEP communities.
- Providing opportunities for client participation, other than through written communications.
- Providing Language Access Services specific to identified individual needs.

## **5. REQUIRMENT TO PROVIDE ACCESS FOR LIMITED ENGLISH PROFICIENT (LEP) PERSONS**

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

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

As required, **Woodley House, Inc.** developed a written LEP Plan (below). Woodley House has evaluated data to determine the extent of need for translation services of its vital documents and materials based on 2016 American Community Survey (ACS) Census data and a report by the Urban Institute analyzing the success of the District of Columbia’s “DC Language Access Act of 2004<sup>3</sup>.” LEP persons can be beneficiaries of Woodley House services and reaching out to these individuals can help increase their utilization of mental health services. Therefore, it is necessary to understand the needs of LEP populations in the District to advise services and outreach.

#### **Assessment of LEP Needs**

The needs 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****

Woodley House, Inc. has reviewed census data on the number of individuals in its service area that have Limited English Proficiency, as well as the primary languages they speak.

**U.S. Census Data–American Community Survey, 2012-2016, 5 year-Estimates**

**Service Area: District of Columbia: (DC city limits, not the greater DC Metro area)**

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<sup>3</sup> Bernstein, Gelatt, Hanson, et. al. (2014). “Ten Years of Language Access in Washington, DC.” Urban Institute

*Total Population.* Data from the U.S. Census Bureau’s American Community Survey (ACS) were obtained through [www.census.gov](http://www.census.gov) for the District of Columbia service area. Information from the 2012-2016 ACS identifies the number and percent of the total population with Limited English Proficiency (LEP), those persons who indicated that they spoke English “not well,” and “not at all”. ACS data also provides detail on the specific languages spoken by those who report to be LEP, as presented below. These data indicate the extent to which translations into other languages are needed to meet the needs of LEP persons.

The agency’s service area includes a **total of 35,198 (5.7% of total population) of persons over 5 years old who are LEP.** The primary languages spoken are:

	Number	Percent
• Spanish	22,003	3.6%
• Other Indo-European languages	4,578	0.7%
• Asian and Pacific Island languages	4,137	0.7%
• All Other languages	4,480	0.7%

*Population with Disabilities.* An additional factor that must be taken into consideration is the limited population served by Woodley House: non-institutionalized adults, over the age of 18, with a diagnosed disability of severe mental illness. This further limits the number of individuals with LEP who come into contact with Woodley House services, benefits, materials, and transportation services.

Information from the 2012-2016 ACS provides details on the “disability status of civilian, non-institutionalized population” in the Woodley House service area. This data includes individuals with all types of disabilities (i.e. physical, visual, mobility, etc.); therefore, the results most likely over-estimate the actual number of adults over 18 years with severe mental illness, the primary population served by Woodley House.

ACS data on the number of non-institutionalized, civilian population with a disability in DC: **Total of 73,230 out of 648,263 (11.3%):**

	Number	Percent (% total pop)
18-64 years old with a disability:	43,159	6.6%
65 years or over with a disability:	24,876	3.8%

*Conclusion.* Based on the above data, it can be estimated that LEP individuals seeking Woodley House services is **likely to be less than 5%** of all individuals encountered. In addition, Woodley House serves approximately 300 men and women annually; therefore, that number is **likely to be less than 15 individuals per year.**

***“It is noted that a relatively low number of LEP persons are served by Woodley House in the service area – no language is spoken by a total of 1,000 persons in the LEP Population.”***



## **LEP Implementation Plan**

The vast majority of clients seeking Woodley House services (over 90%) are referred by DC Department of Behavioral Health (DBH), Core Service Agencies (CSA). As a sub-provider to DBH/CSAs, Woodley House contracts to provide residential, life skills training, and Food Pantry services--a targeted subset of the services limited to adults with severe mental illness. DBH/CSAs identify and contract for the basic needs of these individuals, including identification of and accommodation for individual LEP needs. Referrals to Woodley House services are vetted and coordinated by CSAs; therefore, most referrals have been initially assessed and provided with Language Access Services, based on individual needs, before they encounter Woodley House staff/services. Woodley House cooperates with CSAs to ensure all individuals receive the Language Access Services they require to participate in all Woodley House programs, including transportation services.

Based on the analysis detailed above, Woodley House, Inc. has determined that the following language assistance services are most feasible and appropriate to ensure LEP individuals can participate in Woodley House services, including transportation services.

### **Translation of vital documents into Spanish, to meet individual needs, including:**

- Emergency preparedness brochures;
- Intake and Consumer Acknowledgement documents;
- Consumer Rights, Consumer Choice and Consumer Grievance Procedures documents;
- In-person translation for direct service encounters;
- Availability of bilingual staff with competency in spoken and written Spanish;
- Language Line Translation Services for first-encounter contacts and non-Spanish speakers;

**Access to Language Assistance Services:** Woodley House staff who come into contact with LEP persons can access language services, in accordance with the following policies and procedures for providing language interpreters as needed for persons who do not use English as their primary language or who use non-verbal communication as their primary communication method in accordance with DCMR Title 22§ 3410.21 – 3410.23.

### **“Interpreter Services Policy (#22)”**

22.1 Woodley House, Inc. (WHI) shall provide competent language interpreters as needed for persons who do not use English as a first language or who use a non-primary language for communication. These services shall be provided in a timely manner. All policies and procedures shall follow the applicable Federal and DC laws as well as those regulations outlined in §3410.21-23 of Title 22, MHRS Certification Standards. There are three services to address: a) English language interpreter, b) Sign language interpreter, and c) TTY communication services.

22.2 It is the responsibility of the Director of Clinical Services and the Director of Residential Services to ensure implementation of this policy.

22.3 The following procedures shall be followed to ensure compliance with this policy.

22.3.1 The Intake Staff shall identify each consumer's language needs as a part of the initial intake process. If the referral is made by phone, the Intake Staff will determine if interpreter services are needed so that arrangements can be made prior to intake. If a person is a walk-in referral, and it is determined that they are in need of interpreter services, arrangements will be made to provide an interpreter in a timely manner.

22.4 It is the goal of WHI to employ individuals who reflect the cultural and language competencies of the consumer population served. It is always preferable to request that a clinical manager, skills trainer, residential advisor, and/or other personnel assigned to a consumer have similar ethnic and language related backgrounds when available. However, the staff's expertise in another language does not qualify the staff member to be the designated interpreter in clinical meetings.

22.4.1 All language interpreters are prohibited from simultaneously functioning as a qualified practitioner and as an interpreter.

22.4.2 If no WHI interpreter is available, the Intake Staff will make arrangements to contract for language services. If no contractor is available, the Intake Staff will call the Languages Line Services at 1-800-752-6096 (See Attached Poster) to complete the initial intake. All staff will be trained to use the Language Line Services. This service will be used only when necessary to complete the initial intake process. All urgent and routine referrals will be given an appointment to complete the assessment process and arrangements will be made to have an interpreter present.

22.4.3 WHI will contract out all sign language interpreter services.

22.4.3.1 All persons contracting with Woodley House, Inc. for interpreter services shall possess valid certification from the National Registry of Interpreters for the Deaf and ongoing training in sign language interpreting, with related mental health interpreting.

22.4.3.2 WHI staff and outside providers will be allowed to be credentialed based on skills in mental health interpreting gained through supervised experience of at least one year. This section follows §3410.22 of Title 22 and the credentialing regulations (See Section 14). Supervised experience shall include supervision by interpreter certified by National Registry of Interpreters for the Deaf as well as on-going training in sign language interpreting, preferably related to mental health.

22.4.3.3 All persons contracting with WHI for interpreter services must have supervised experience for at least one (1) year prior to employment with WHI.

22.5 WHI negotiates with Telecommunications Companies to establish and implement TTY communication lines to respond to service requests and needs of consumers and prospective consumers. In addition, WHI staff shall be trained in the use of communication devices.

22.6 The Director of Clinical Services and/or the Director of Residential Services must approve authorization for the usage of interpreter services.

22.7 The Director of Finance oversees all personnel contracts and CSA/Sub-provider agreements. As is outlined in the Subcontractor Policy (See Section 37), the interpreter services staff must follow the hiring procedures established by WHI.

22.8 The billing of services performed will be submitted following the performance of the services and the signed confirmation of services rendered by the Director of Clinical Services. Payment will follow within 30 days from the submission of the invoice.

22.9 The Director of Finance contracts and purchases all necessary communications equipment, enabling each WHI facility to conduct services when consumers and prospective consumers are in need of special communication devices.

22.10 The Maintenance Staff of WHI is responsible for setting up TTY telephone lines and ensuring that staff is oriented to its use.

22.11 WHI Annual Training Program and Orientation Training ensure staff knows how to access and use the communication devices.

22.12 Supervision of Interpreter Services is the responsibility of the Director of Clinical Services.

Revised May 2017

**Staff Training:** As noted above, all Woodley House staff is provided with training on the available language assistance services, Cultural Competency and other relevant resources, at orientation and annually.

**Providing Notice to LEP Persons:** LEP persons are notified of the availability of language assistance through the following approaches:

- Title VI policy statement included in prominent locations;
- Website, with links to translations of vital documents in other languages;
- Signs posted in vehicles, residential common areas, and administrative offices;
- Ongoing outreach efforts through DBH, and partner organizations;
- Automated Language Access telephone services in the most common languages encountered.

**Monitoring/updating the plan:** This plan will be reviewed and updated on a periodic basis (at least every 3 years) based on feedback, updated demographic data, and individual client needs. As part of ongoing outreach to community organizations, Woodley House will solicit feedback on the effectiveness of language assistance provided and unmet needs. In addition, we will conduct periodic contacts with LEP residents, review updated Census data, and conduct annual compliance reviews on the adequacy and quality of the language assistance provided, in order to determine changes to meet LEP needs.

**Monitoring Title VI Complaints:** The Title VI Manager will investigate inequities in service delivery based on complaints received. Depending on the nature of complaints, the review will examine type of service, frequency of services provided, and likelihood of recurrence. If inequities are discovered during this review, a report will be made to the CEO and President of the Board of Trustees, including options for reducing the disparity and changes in services will be recommended.

**6. Requirement on Planning and Advisory Boards in Addition to Outreach Efforts**

**Not Applicable**

**VIII. Requirements of Transit Providers –**

**Not Applicable**

**APPENDIX A - BOARD OF TRUSTEES MINUTES APPROVING TITLE VI PROGRAM**

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

List of locations where the Title VI Notice is posted:

All Woodley House Vehicles including:

- Dodge Grand Caravan- 2013-vin # 2C4DGBDR570196
- Dodge Braun Wagon/Minivan-2017-vin# 2C7WDGBGHR742956

All Woodley House Locations including:

- Business Office, 6856 Eastern Ave., NW, Suite 300, Washington, DC 20012
- Valenti House/SIL/Food Pantry, 2711 Connecticut Ave., NW, Washington, DC 20008
- Crossing Place, 2731 Connecticut Ave., NW, Washington, DC 20008
- Holly House, 7426 13<sup>th</sup> Street, NW, Washington, DC 20012

**Public Notice  
Non-Discrimination  
Civil Rights Act of 1964**

Title VI of the Civil Rights Act of 1964, and related statutes, prohibits discrimination on the basis of race, color, disability, gender 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).

Woodley House, 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 further information or feel you are being denied participation in or being denied benefits of the transit services provided by Woodley House, Inc., or otherwise being discriminated against because of your race, color, national origin, gender, age, or disability, please contact:

Name:	Gary W. Frye
Title:	CEO/Title VI Manager
Agency Name:	Woodley House, Inc.
Address:	6856 Eastern Ave., NW, Suite 300
City, State Zip code:	Washington, DC 20012
Telephone Number:	202-830-3508
Email address:	<a href="mailto:gfrye@woodleyhouse.org">gfrye@woodleyhouse.org</a>

**APPENDIX C - TITLE VI COMPLAINT FORM**

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