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**Title VI Plan and Procedures**  
**Title VI of the Civil Rights Act of 1964**

**Colonial Behavioral Health**



**Adopted**

**February 4, 2025**

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## **I. INTRODUCTION**

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

The Civil Rights Restoration Act of 1987 clarified the intent of Title VI to include all programs and activities of Federal-aid recipients, sub-recipients, and contractors whether those programs and activities are federally funded or not. Recently, the Federal Transit Administration (FTA) has placed renewed emphasis on Title VI issues, including providing meaningful access to individuals with Limited English Proficiency.

Recipients of public transportation funding from FTA and the Virginia Department of Rail and Public Transportation (DRPT) are required to develop policies, programs, and practices that ensure that federal and state transit dollars are used in a manner that is nondiscriminatory as required under Title VI.

This document details how Colonial Behavioral Health incorporates nondiscrimination policies and practices in providing services to the public. Colonial Behavioral Health's Title VI policies and procedures are documented in this plan and its appendices and attachments. This plan will be updated periodically (at least every three years) to incorporate changes and additional responsibilities that arise.

## **II. OVERVIEW OF SERVICES**

Colonial Behavioral Health is one of 40 statewide community services boards and behavioral health authorities responsible for providing behavioral health services to make our communities healthier, safer places to live.

Colonial Behavioral Health provides services for mental health illnesses, developmental disabilities, and substance use disorders to individuals and families living in James City County, City of Poquoson, City of Williamsburg, and York County.

Transportation to and from Colonial Behavioral Health and other community locations is provided to individuals with a developmental disability and/or mental illness who are actively enrolled in specific services at Colonial Behavioral Health. Transportation is provided as part of day services, psychosocial rehabilitation, case management, and mental health skill-building.

Transportation is not provided to the public, nor is it provided to individuals who participate in other Colonial Behavioral Health programs or services.

### III. POLICY STATEMENT AND AUTHORITIES

#### Title VI Policy Statement

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

The Colonial Behavioral Health 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 Pmi 21.



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David A. Coe, Executive Director

February 4, 2025

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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, or national origin, 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 Individuals, (December 14, 2005), and Section 12 of FTA’s Master Agreement, FTA MA 13 (October 1, 2006).

#### **IV. NONDISCRIMINATION ASSURANCE TO DRPT**

In accordance with 49 CFR Section 21.7(a), every application for financial assistance from the Federal Transit Administration (FTA) must be accompanied by an assurance that the applicant will conduct the program in compliance with DOT's Title VI regulations. This requirement is fulfilled when the Virginia Department of Rail and Public Transportation (DRPT) submits its annual certifications and assurances to FTA. DRPT shall collect Title VI assurances from sub-recipients prior to passing through FTA funds.

As part of the Certifications and Assurances submitted to DRPT with the Annual Grant Application and all Federal Transit Administration grants submitted to the DRPT, Colonial Behavioral Health submits a Nondiscrimination Assurance which addresses compliance with Title VI as well as nondiscrimination in hiring (EEO) and contracting (DBE), and nondiscrimination based on disability (ADA).



In signing and submitting this assurance, Colonial Behavioral Health confirms to the DRPT the agency's commitment to nondiscrimination and compliance with federal and state requirements.

## V. PLAN APPROVAL DOCUMENT

### Colonial Behavioral Health Board of Directors Approval

On behalf of the Colonial Behavioral Health Board of Directors, I hereby acknowledge the receipt of the Colonial Behavioral Health Title VI Implementation Plan. The full board has reviewed and approved the plan and authorized me, as Chairman, to provide a signature enacting this plan.

We are committed to ensuring that no person is excluded from participation in or denied the benefits of transportation services based on race, color, or national origin, as protected by Title VI according to Federal Transit Administration (FTA) Circular 4702.1B Title VI requirements and guidelines for FTA sub-recipients.

  
\_\_\_\_\_  
Ryan Ashe, Chairman  
Colonial Behavioral Health, Board of Directors  
\_\_\_\_\_  
Date



# **COLONIAL BEHAVIORAL HEALTH BOARD MEETING**

**DATE:** February 4, 2025

**LOCATION:** Colonial Behavioral Health, 473 McLaws Circle, Williamsburg, VA 23185

**WELCOME AND CALL TO ORDER:** 3:00pm

## **BOARD MEMBERS PRESENT:**

Mr. Ryan Ashe – James City County  
Mr. Tarun Chandrasekar - Williamsburg  
Mr. John Collins – York County  
Ms. Wendy Evans – Williamsburg  
Dr. Dawn Ide – City of Poquoson  
Mr. Bruce Keener – York County  
Mr. Steven Miller – York County  
Ms. Kristen Nelson – York County  
Ms. Amber Richey – York County  
Ms. April Schmidt – York County  
Ms. Donyale Wells – James City County  
Mr. Roy Witham – James City County

## **BOARD MEMBERS ABSENT:**

Ms. Erin Otis – James City County  
Dr. John Shaner – City of Poquoson

## **CBH STAFF PRESENT:**

David Coe, Kristy Wallace, Katie Leuci, Nancy Parsons, Kyra Cook, Linda Butler, Patty Hartigan, Marsha Obremski, Chaenn Thomas

**GUESTS:** Sharon Proffit and her son, Nathan (Advisory Council Member)

**PUBLIC COMMENT:** None

## **CONSENT CALENDAR:**

The consent calendar was presented for approval of the following meeting minutes:

- January 7, 2025, Board of Directors Meeting

John Collins made a motion to accept the consent agenda as presented. Bruce Keener seconded the motion, and it passed unanimously.

## **PRESENTATION**

Virginia Thumm and Barbara Hamm Lee (Virginia Fundraising Consultants) presented the fundraising final report. Key takeaways: communication, developing relationships and putting best practices into place. We will need to engage the community. We will need to develop a Comprehensive Communications Plan. This is the first time CBH has ever asked for funds, this is catching our community off guard.

## **CLOSED SESSION**

John Collins made the following motion to move to a closed session: I motion that the Board convene a closed meeting, for the following purpose:

Consultation with legal counsel and/or briefing by staff members pertaining to actual or probable litigation, where such consultation or briefing in open meeting would adversely affect the litigating posture of the public body pursuant to Virginia Code Section 2.2-3711(A)(7).

John Collins made a motion to conclude the closed session. Donyale Wells seconded the motion, which was unanimously approved. Board members were individually polled immediately coming out of the closed session to certify that only those matters covered in the motion for closed session were discussed.

## **PRESENTATION**

Josh Roller (Robinson, Farmer & Cox) presented the Fiscal Year 2024 Audit. Hard copies of the audit were available for Board members/CBH staff.

## **ACTION ITEMS**

- **Action Item A-1 Acceptance of Fiscal Year 2024 Audit (Nancy)**– CBH’s FT 2024 Financial Audit has been completed by the accounting firm Robinson, Farmer & Cox. Josh Roller, CPA, presented the report to the full Board during this meeting. An electronic link and hard copies of the audit were made available to our Board members.  
Amber Richey made the following motion: “It is moved that the Fiscal Year 2024 Audit of Colonial Behavioral Health finances be accepted by the Board as presented by Robinson, Farmer, & Cox. John Collins seconded the motion; all were in favor, and it passed unanimously.
- **Action Item A-2 Title VI Plan for Virginia Department of Rail and Public Transportation (David)** – Title VI Plan requirements change periodically and thus require approval from locality/nonprofit governing bodies. CBH is preparing to submit a request for support

(CBH would like to replace a minibus. CBH would like to request a 14-passenger bus, equipped to hold two wheelchairs) and must approve the updated Title VI Plan to qualify. Wendy Evans made a motion that the Board of Directors approves the amended Title VI Plan as presented. Roy Witham seconded the motion; all were in favor, and it passed unanimously.

- **Action Item A-3 Remote Participation Policy (David)** – During the January 7, 2025, Board meeting, Board members requested that the proposed Policy be reviewed by agency legal counsel before taking a vote for approval. That review has been completed, and a copy of Mr. McDermott’s legal option is included in the Board packet. The effective date of this policy is February 5, 2025.  
John Collins made a motion that the Board of Directors approve the amended “Board Members Remote Participation in Board and Commitment Meetings” as presented and based on opinion of legal counsel. Bruce Keener seconded the motion; all were in favor, and it passed unanimously.

#### **UPDATES/REPORTS:**

- **Advisory Council Update (Marsha)** – The first meeting took place on January 21, 2025. 2 of the 5 members were in attendance (1 in person, 1 virtual). The next meeting is scheduled for February 21, 2025, David has been invited to this meeting to provide a high-level explanation of CSB’s and CBH.
- **Future CIP Requests (Kyra)** – The Proposed Requests for Support from Government was shared electronically during the Board meeting. CBH will request funding from the following: Federal Government (Governor’s Kaine and Warner), State Government (budget amendment), and the following four localities: James City County, York County, Williamsburg, and Poquoson.

#### **EXECUTIVE DIRECTOR’S REPORT:**

- **Agency Issues:**  
Progress is being made with the property conveyance related to the Cardinal Ridge parcel.  
Recruitment efforts continue for CBH’s Director of Behavioral Health Services.
- **Community Issues:**  
A tour of Southeastern Virginia Health System’s office was recently completed. We

are optimistic about opportunities to provide integrated care in our community.

- **Regional Issues:**

Bob Williams is the new CEO at Eastern State Hospital. We are looking forward to developing partnerships to help our local community and our region by taking advantage of proximity and shared purpose.

- **Public Policy:**

Governor Youngkin's proposed budget was released on December 18, 2024. An updated spreadsheet of the proposed state budget is attached.

**ADJOURNMENT:**

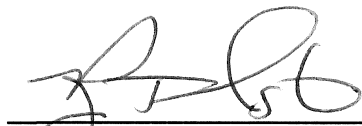
Upon a motion to adjourn the meeting made by Bruce Keener and a second by Steve Miller, the meeting was adjourned at 5:18pm.

**NEXT MEETING:**

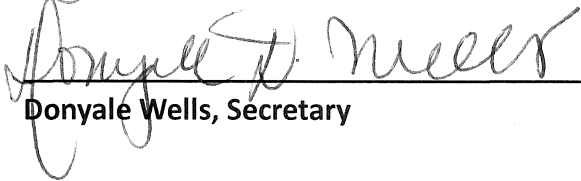
Date: Tuesday, March 4, 2025

Location: 473 McLaws Circle, Williamsburg, VA 23185

Time: 3:00pm



Ryan Ashe, Chair



Donyale Wells, Secretary

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

The Colonial Behavioral Health's Development and Communications Manager is responsible for ensuring implementation of the agency's Title VI program. Title VI program elements are interrelated, and responsibilities may overlap. The specific areas of responsibility have been delineated below for purposes of clarity.

### **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.

### **Detailed Responsibilities of the Title VI Manager**

The Title VI Manager is charged with the responsibility for implementing, monitoring, and ensuring compliance with Title VI regulations. Title VI responsibilities are as follows:

1. Process the disposition of Title VI complaints received.
2. Collect statistical data (race, color, or national origin) of participants in and beneficiaries of agency programs, (e.g., affected citizens, and impacted communities).
3. Conduct annual Title VI reviews of agency to determine the effectiveness of program activities at all levels.
4. Works in collaboration with the General Services Officer to conduct Title VI reviews of construction contractors, consultant contractors, suppliers, and other recipients of federal-aid fund contracts administered through the agency.
5. Works in collaboration with Human Resources to conduct training programs on Title VI and other related statutes for agency employees.
6. Prepare a yearly report of Title VI accomplishments and goals, as required.
7. Develop Title VI information for dissemination to the general public and, where appropriate, in languages other than English.
8. Identify and eliminate discrimination.
9. Establish procedures for promptly resolving deficiency status and writing the remedial action necessary, all within a period not to exceed 90 days.

## **General Title VI Responsibilities of the Agency**

The Title VI Manager is responsible for substantiating that these elements of the plan are appropriately implemented and maintained, and for coordinating with those responsible for public outreach and involvement and service planning and delivery.

### **1. Data Collection**

To ensure that Title VI reporting requirements are met, Colonial Behavioral Health will maintain:

- A database or log of Title VI complaints received. The investigation of and response to each complaint is tracked within the database or log.

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

As a sub-recipient of FTA funds, Colonial Behavioral Health is required to submit a Quarterly Report Form to DRPT that documents any Title VI complaints received during the preceding quarter and for each year. Further, we will submit to DRPT updates to any of the following items since the previous submission, or a statement to the effect that these items have not been changed since the previous submission, indicating date:

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

### **3. Annual Review of Title VI Program**

Each year, in preparing for the Annual Report and Updates, the Title VI Manager will review the agency's Title VI program to assure implementation of the Title VI plan. In addition, they will review agency operational guidelines and publications, including those for contractors, to verify that Title VI language and provisions are incorporated as appropriate.

### **4. Dissemination of Information Related to the Title VI Program**

Information on our Title VI program will be disseminated to agency employees, contractors, and beneficiaries, as well as to the public, as described in the "public outreach and involvement" section of this document, and in other languages when needed according to the LEP plan as well as federal and state laws/regulations.

### **5. Resolution of Complaints**

Any individual may exercise his or her right to file a complaint if that person believes that he, she, or any other program beneficiaries have been subjected to unequal treatment or discrimination in the receipt of benefits/services or prohibited by non-discrimination requirements. Colonial Behavioral Health will report the complaint to the DRPT within three business days (per DRPT requirements), and make a concerted effort to resolve complaints locally, using the agency's Title VI Complaint Procedures. All Title VI complaints and their resolution will be logged as described under Section 1. Data collection and reported annually (in addition to immediately) to DRPT.

### **6. Written Policies and Procedures**

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

## **7. Internal Education**

Title VI training is the responsibility of the Human Resources Department. Our employees will receive training on Title VI policies and procedures upon hiring and they are available for review on the agency Intranet. This training will include requirements of Title VI, our obligations under Title VI (LEP requirements included), and required data that must be gathered and maintained. In addition, training will be provided when any Title VI-related policies or procedures change (agency-wide training), or when appropriate in resolving a complaint.

## **8. Title VI Clauses in Contracts**

In all federal procurements requiring a written contract or Purchase Order (PO), Colonial Behavioral Health's contract/PO will include appropriate non-discrimination clauses. The Title VI Manager will work with the General Services Officer who is responsible for procurement contracts and POs to ensure appropriate non-discrimination clauses are included.

# **VII. PROCEDURES FOR NOTIFYING THE PUBLIC OF TITLE VI RIGHTS AND HOW TO FILE A COMPLAINT**

## **Requirement to Provide a Title VI Public Notice**

Title 49 CFR Section 21.9(d) requires recipients to provide information to the public regarding the recipient's obligations under DOT's Title VI regulations and apprise members of the public of the protections against discrimination afforded to them by Title VI. At a minimum, Colonial Behavioral Health shall disseminate this information to the public by posting a Title VI notice on the agency's website and in public areas of the agency's office(s), including the reception desk, meeting rooms, in federally funded vehicles, etc.

**[SEE APPENDIX A - Title VI Notice to the Public](#)**

**[SEE APPENDIX B - Title VI Notice to the Public List of Locations](#)**



## VIII. TITLE VI COMPLAINT PROCEDURES

### Requirement to Develop Title VI Complaint Procedures and Complaint Form

In order to comply with the reporting requirements established in 49 CFR Section 21.9(b), all recipients shall develop procedures for investigating and tracking Title VI complaints filed against them and make their procedures for filing a complaint available to members of the public. Recipients must also develop a Title VI complaint form. The form and procedure for filing a complaint shall be available on the recipient's website and at their facilities.

Any individual may exercise his or her right to file a complaint with Colonial Behavioral Health if that person believes that he or she has been subjected to unequal treatment or discrimination in the receipt of benefits or services. We will report the complaint to the DRPT within three business days (per DRPT requirements), and make a concerted effort to resolve complaints locally, using the agency's Nondiscrimination Complaint Procedures. All Title VI complaints and their resolutions will be logged and reported annually (in addition to immediately) to the DRPT.

Colonial Behavioral Health includes the following language on all printed information materials, on the agency's website, in press releases, in public notices, in published documents, and on posters on the interior of each vehicle operated in passenger service:

***Colonial Behavioral Health is committed to ensuring that no person is excluded from participating in, or in or denied the benefits of its transit services on the basis of race, color, or national origin, as protected by Title VI of the Civil Rights Act of 1964.***

***For additional information on Colonial Behavioral Health's nondiscrimination policies and procedures, or to file a complaint, please visit the website at [www.colonialbh.org](http://www.colonialbh.org) or contact the Title VI Manager, 1657 Merrimac Trail, Williamsburg, VA 23185.***

Instructions for filing Title VI complaints are posted on the agency's website and in posters on the interior of each vehicle operated in passenger service and agency's facilities and are also available from any member of the agency's support staff or a vehicle operator.

**[SEE APPENDIX C - Title VI Complaint Form](#)**

## **Procedures for Handling and Reporting Investigations, Complaints and Lawsuits**

These procedures apply to all complaints filed under Title VI of the Civil Rights Act of 1964 and related laws (hereinafter, “complaints”).

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 Colonial Behavioral Health’s Title VI Manager. In response to the complaint and/or any Title VI Investigations initiated by FTA or DRPT, or any Title VI lawsuits are filed against Colonial Behavioral Health, the agency will follow these procedures:

### **Procedures**

1. The complaint is to be filed in the following manner:
  - a. The complaint shall be in writing using the designated complaint form (available on Colonial Behavioral Health’s website) and signed by the complainant(s).
  - b. The complaint must include allegations of covered discrimination, such as race, color, or national origin.
  - c. The complaint must include allegations that concern a Colonial Behavioral Health program or activity.
  - d. The complaint should include:
    - The complainant’s name, address, telephone number, and email address.
    - 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 of the most recent occurrence of discrimination).
    - 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.
    - Indication of any related complaint activity (i.e., was the complaint also submitted to DRPT or FTA?).

- e. The complaint shall be submitted within **180 days of the alleged act of discrimination** to the Colonial Behavioral Health Title VI Manager at 1657 Merrimac Trail, Williamsburg, VA 23185 or [TitleVI@colonialbh.org](mailto:TitleVI@colonialbh.org).
  - f. Complaints received by any other employee of Colonial Behavioral Health will be forwarded to the Title VI Manager in a timely manner.
  - g. 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. Under these circumstances, the complainant will be interviewed, and the Title VI Manager will assist the complainant in converting the verbal allegations to writing.
- 2. Upon receipt of a complaint, the Title VI Manager will immediately:
    - a. Notify DRPT (no later than 3 business days from receipt).
    - b. Notify the Colonial Behavioral Health Authorizing Official.
    - c. Ensure that the complaint is entered into the complaint database.
  - 3. Within three business days of receipt of the complaint, the Title VI Manager will contact the complainant by telephone to set up an interview.
  - 4. Prior to the interview, 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 they perceive as relevant to proving their complaint.
  - 5. If DRPT has assigned staff to assist with the investigation, the Title VI Manager will offer an opportunity to participate in the interview.
  - 6. The alleged discriminatory service or program official will be given a reasonable opportunity to respond to all aspects of the complainant's allegations.
  - 7. The Title VI Manager will determine, based on factors including, but not limited to, relevancy or duplication of evidence, which witnesses will be contacted and questioned.
  - 8. The investigation may also include:
    - a. Investigating contractor operating records, policies, or procedures.
    - b. Reviewing routes, schedules, and fare policies.
    - c. Reviewing operating policies and procedures.
    - d. Reviewing scheduling and dispatch records.
    - e. Observing behavior of the individual whose actions were cited in the complaint.

9. All steps taken and findings in the investigation will be documented in writing and included in the complaint file.
10. The Title VI Manager will contact the complainant at the conclusion of the investigation, but prior to issuing the final report, to inform the complainant of the findings of the investigation.
11. After the Title VI Manager informs the complainant of the investigation's findings, before the final report is issued, the complainant will have a reasonable opportunity to give a rebuttal statement at the end of the investigation process.
12. At the conclusion of the investigation and **within 60 days** of the interview with the complainant, the Title VI Manager will prepare a report that includes a narrative description of the incident, identification of individuals interviewed, findings, and recommendations for disposition. This report will be provided to the Authorizing Official, DRPT, and, if appropriate, Colonial Behavioral Health's legal counsel.
13. The Title VI Manager will send a letter to the complainant notifying them of the outcome of the investigation (the "notification letter"). If the complaint is substantiated, the notification letter will indicate the course of action that will be followed to correct the situation. If the complaint is not substantiated, the notification letter will explain the reasoning and advise the complainant of their rights to file a complaint with the FTA and/or appeal the outcome to the DRPT. The notification letter will be copied to DRPT.
14. A complainant that is not satisfied with the outcome of an investigation conducted by Colonial Behavioral Health may appeal to the DRPT within 30 days of receipt of the notification letter. DRPT will analyze the facts of the case and will issue its conclusion to the appellant according to its procedures.
15. A complaint may be administratively dismissed for the following reasons:
  - a. The complainant requests the withdrawal of the complaint.
  - b. An interview cannot be scheduled with the complainant after reasonable attempts.
  - c. The complainant fails to respond to repeated requests for additional information needed to process the complaint.

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.

## **Transportation-Related 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;
- Lawsuits; and
- Complaints 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 DRPT every three years and information shall be provided to DRPT quarterly and annually.

**[SEE APPENDIX D - Investigations, Lawsuits and Complaints Document](#)**

## **IX. PUBLIC OUTREACH AND INVOLVEMENT PUBLIC PARTICIPATION PLAN**

### **Introduction**

The Public Participation Plan (PPP) is a guide for ongoing public participation endeavors. Its purpose is to ensure that Colonial Behavioral Health utilizes effective means of providing information and receiving public input on transportation decisions from low income, minority, and limited English proficient (LEP) populations, as required by Title VI of the Civil Rights Act of 1964 and its implementing regulations.

Under federal regulations, transit operators must take reasonable steps to ensure that Limited English Proficient (LEP) individuals have meaningful access to their programs and activities. This means that public participation opportunities, normally provided in English, should be accessible to individuals who have a limited ability to speak, read, write, or understand English.

Colonial Behavioral Health is a provider of behavioral health services that provides transportation with FTA-funded vehicles for programs as part of direct services. Transportation is not provided to the community at large. As such, Colonial Behavioral Health does not have a public participation plan. To participate in the programs in which Colonial Behavioral Health provides transportation, the program admission criteria must be met. Transportation input from individuals served, to include LEP individuals, is discussed at admission to the program and during the personalized treatment planning process, quarterly and annual reviews and during our annual Consumer Satisfaction Survey.

## **X. LANGUAGE ASSISTANCE PLAN FOR INDIVIDUALS WITH LIMITED ENGLISH PROFICIENCY (LEP)**

### **Introduction and Legal Basis**

LEP is a term that defines any individual not proficient in the use of the English language. The establishment and operation of an LEP program meets objectives set forth in Title VI of the Civil Rights Act and Executive Order 13166, Improving Access to Services for Individuals with Limited English Proficiency (LEP). This Executive Order requires federal agencies receiving financial assistance to address the needs of non-English speaking individuals.

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 Colonial Behavioral Health, is based on FTA guidelines.

In 2005, Colonial Behavioral Health developed a written LEP Plan (below), which is reviewed annually and updated as needed. Colonial Behavioral Health has evaluated the American Community Survey (ACS) Census data to determine the extent of need for translation services of its vital documents and materials.

### **Assessment of Needs and Resources**

The need and resources for LEP language assistance were determined through a four-factor analysis as recommended by FTA guidance.

#### **Factor 1: Assessment of the Number and Proportion of LEP Individuals Likely to be Served or Encountered in the Eligible Service Population**

The agency has reviewed census data on the number of individuals in its service area that have limited English Proficiency, as well as the languages they speak.

## U.S. Census Data – American Community Survey (2018-2022)

Data from the U.S. Census Bureau’s American Community Survey (ACS) were obtained through [www.census.gov](http://www.census.gov) by Colonial Behavioral Health’s service area. The agency’s service area includes a total of 4,436 (2.6%) individuals with Limited English Proficiency (those individuals who indicated that they spoke English “less than very well,” in the 2018-2022 ACS Census).

Information from the 2018-2022 ACS also provides more detail on the specific languages that are spoken by those who report that they speak English less than very well.

Languages spoken at home by those with LEP are presented below. The data indicates the extent to which translations into other languages are needed to meet the needs of LEP individuals.

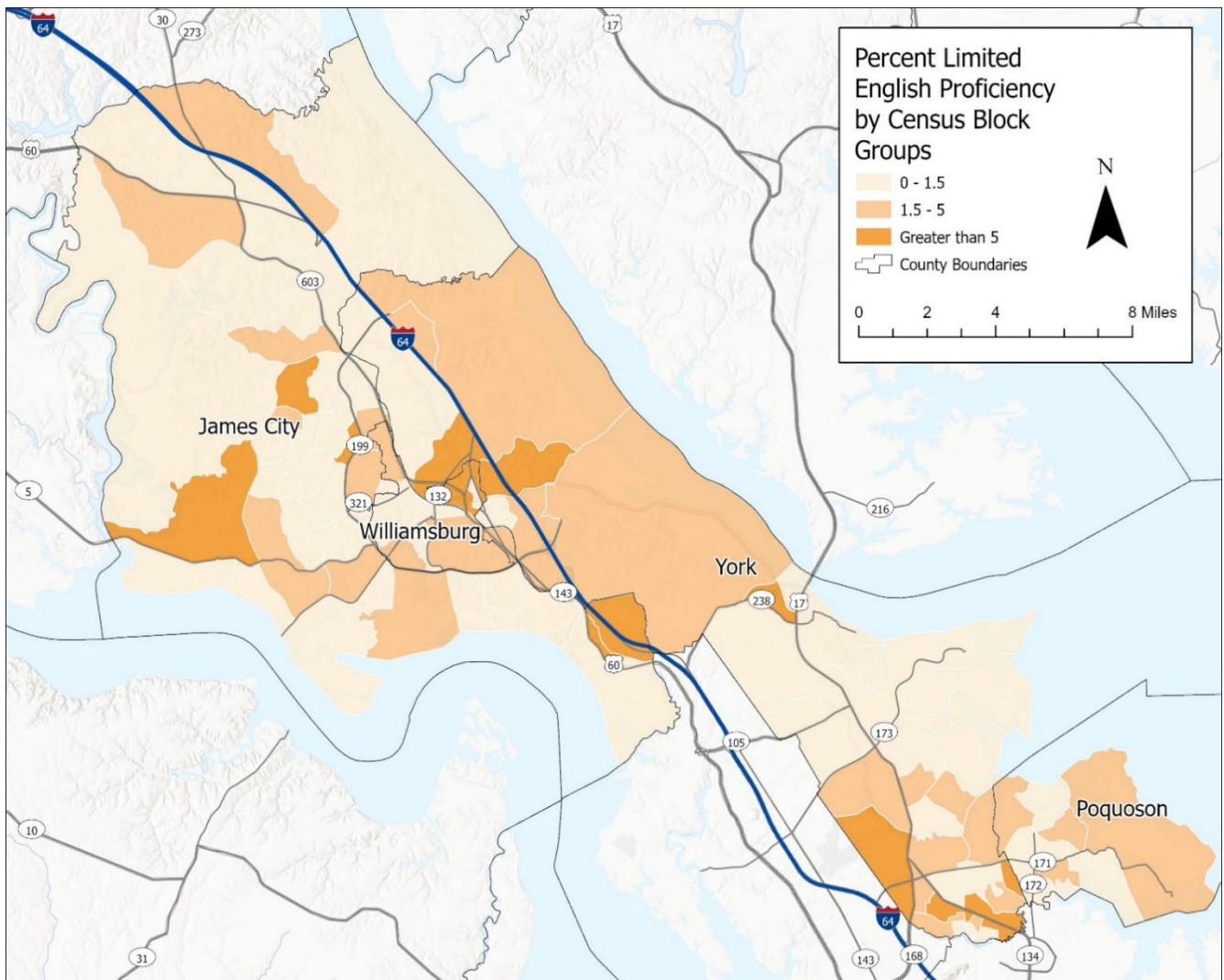
**Table 1 - LEP Population**

Colonial Behavioral Health Service Area			
Language	Number of LEP Population	Percent of Service Area Population Speaking Language	Percent of LEP Population Speaking Language
Spanish	1,733	1.03%	39.07%
Chinese (incl. Mandarin, Cantonese)	595	0.35%	13.41%
Other Indo-European languages	533	0.32%	12.02%
Korean	338	0.20%	7.62%
Arabic	297	0.18%	6.70%
Vietnamese	235	0.14%	5.30%
Other Asian and Pacific Island languages	220	0.13%	4.96%
Russian, Polish, or other Slavic languages	208	0.12%	4.69%
French, Haitian, or Cajun	133	0.08%	3.00%
Other and unspecified languages	111	0.07%	2.50%
German/other West Germanic languages	33	0.02%	0.74%
Total LEP Population	4,436	2.63%	
<b>Total Service Area Population</b>	<b>168,528</b>		



Languages that surpass the Safe Harbor Provision include Spanish (1,733). Figure 1 is a map of the Service Area with the percentage LEP population for each Census Block Group. The Block Groups that have the highest rate of LEP individuals are located in western York County, southeastern James City County, and west of Poquoson.

**Figure 1 – Percentage of LEP by Census Block Group**



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

Colonial Behavioral Health reviewed the relevant benefits, services, and information provided by the agency and determined the extent to which LEP individuals have come into contact with these functions through the following channels:

- Calls to Colonial Behavioral Health’s customer service telephone line;
- Visits to the agency’s headquarters; and
- Access to the agency’s website.

During the fiscal year ending June 30, 2024, Colonial Behavioral Health provided services to 80 individuals (out of 3,557) whose primary language was not English:

Primary Language	Number of Individuals	%
American Sign Language	4	0.05%
Arabic	2	0.03%
Chinese	1	0.01%
Non-Verbal	30	0.38%
Other	20	0.25%
Spanish	22	0.28%
Vietnamese	1	0.01%

We will continue to identify emerging populations as updated Census and American Community Survey data become available for our service area. In addition, when LEP individuals contact our agency, we attempt to identify their language and keep records on contacts to accurately assess the frequency of contact. To assist in language identification, we use a language identification flashcard based on that which was developed by the U.S. Census Bureau. (<https://www.lep.gov/sites/lep/files/resources/ISpeakCards2004.pdf>)

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

Colonial Behavioral Health provides the following services that may include transportation:

- Case Management: Helps individuals by accessing support and services critical to meeting basic needs, improving quality of life, and promoting self-empowerment.
- Developmental Disability Day Services:
  - Community Engagement: Fosters an individual's ability to acquire, retain or improve skills necessary to building positive social behavior, interpersonal competence, greater independence, employability, and personal choice. This program enables the individual to access typical activities in community life enjoyed by the general population such as education or training, retirement, and volunteer activities. This program is provided in groups with no more than a 1:3 employee-to-individual ratio.
  - Group Day Services: Provides opportunities for peer interactions, community integration, career planning and enhancement of social networks. Supports may be provided to ensure individual health and safety. These services are provided in groups with no more than a 1:7 employee-to-individual ratio.
- Developmental Disability Residential Services: Assists individuals with living independently in the community to the greatest extent possible. Based on individual needs, support and instructional activities are provided to help individuals improve the quality of their daily lives, and promote self-determination, wellness, and community integration.
- Crisis Services: Designed to address urgent or severe behavioral health crises in a variety of settings 24 hours a day, seven days a week.
- Mental Health Skill-building Services: Goal-directed training designed to enable individuals to achieve and maintain community stability and independence in the most appropriate, least restrictive environment. Services are typically provided in one-hour increments in the individual's home or community and are tailored to individual needs.
- Assertive Community Treatment: An organized service that provides multidisciplinary team treatment following a planned, structured regimen. This is a mobile service delivered in community locations that are comfortable and convenient for individuals served; these services enable individuals to live in their own homes and find and maintain work in the community.

- **Psychosocial Rehabilitation:** A recovery-based program provided for two or more hours per day. The program offers structured day support services including community integration, independent living skills instruction, interpersonal and social skills development, and communication skills instruction.

Based on past experience serving and communicating with LEP individuals and interviews with community agencies, we learned that no services particularly serve LEP individuals in the community. Transportation is provided as part of service delivery and accommodations are made for LEP individuals on an as-needed basis.

#### **Factor 4: Assessment of the Resources Available to the Agency**

The following are language assistance measures currently being provided by Colonial Behavioral Health, at no cost to the individuals served:

- Telephone and On-site interpretation services: Spanish Chinese, French, Japanese, Korean, Russian, Vietnamese, Armenian, Cambodian, German, Haitian, Creole, Italian, Polish, Portuguese, Farsi, Tagalog, Thai, Urdu, and all other languages offered.
- Scheduled Virtual ASL Interpretation.

Based on the analysis of demographic data and contact with LEP individuals, Colonial Behavioral Health has determined that no additional services are needed at this time to provide meaningful access.

#### **Resources**

Colonial Behavioral Health allocates resources toward language assistance expenses as available and appropriate. The agency does not have a set budget for translation services.

#### **Feasible and Appropriate Language Assistance Measures**

Based on the available resources, the following language assistance measures are feasible and appropriate for our agency at this time:

- Offer timely availability of interpretation.
- Recruit clinical service employees who are bilingual, and able to provide competent interpretation.
- Contract with interpretation services, independent interpreters or volunteer interpreters who satisfy the competency requirements for CBH interpreters.
- Offer both in-person and telephone interpretation services.

- Provide written materials to individuals and the public in English and those languages regularly encountered by CBH other than English.
- Develop, maintain, and post notices in key locations of the organization notifying individuals of their right to free language assistance.
- Utilize language identification cards (“I speak” cards) which assist LEP individuals in identifying their language needs.
- Document the language of individuals when they initially request services.
- Implement procedures for employees for the purpose of accessing in-person and telephone interpretation.
- Refrain from requesting, encouraging, or requiring LEP or hearing-impaired individuals to use friends, family, or minor children as interpreters.

## **LEP Implementation Plan**

Through the four-factor analysis, Colonial Behavioral Health has determined that no additional types of language assistance are needed at this time. The following details are current agency procedures.

### **Employee Access to Language Assistance Services**

Agency employees who encounter LEP individuals can access language services by calling the contract translation service. All employees will be provided with information about the contracted language assistance service via the internal Interpretation ticket system.

### **Responding to LEP Callers**

Employees utilize the contracted translation and interpretation provider listed on the internal agency Intranet for translation services.

### **Responding to Written Communications from LEP Individuals**

Employees utilize the contracted translation and interpretation provider listed on the internal agency Intranet for translation services.

## **Responding to LEP Individuals in Person**

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

- Utilize language identification cards (“I speak” cards) which assist LEP individuals in identifying their language needs.
- Contact the contracted translation and interpretation provider listed in the internal agency Intranet for translation services once the language need has been identified.

## **Employee Training**

As noted previously, all Colonial Behavioral Health employees have access to all available language assistance services and additional information and referral resources, updated annually. All new hires receive training in assisting LEP individuals as part of their sensitivity and customer service training. This includes:

- A summary of the transit agency’s responsibilities under the DOT LEP Guidance;
- A summary of the agency’s language assistance plan;
- A summary of the number and proportion of LEP individuals in the agency’s service area, the frequency of contact between the LEP population and the agency’s programs and activities, and the importance of the programs and activities to the population;
- A description of the type of language assistance that the agency is currently providing and instructions on how agency employees can access these products and services; and
- A description of the agency’s cultural sensitivity policies and practices per Policy #14: Personnel Policy.

Also, all employees who routinely come into contact with individuals we serve, as well as their supervisors and management, receive annual refresher training on policies and procedures related to assisting LEP individuals.

## **Providing Notice to LEP Individuals**

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

- On our website, with links to translations of website content; and
- Through signs posted in our customer service and administrative offices.

## **Monitoring/Updating the Plan**

This plan will be updated on a periodic basis (at least every three years), based on feedback, updated demographic data, and resource availability.

As part of ongoing outreach to community organizations, Colonial Behavioral Health will solicit feedback on the effectiveness of language assistance provided and unmet needs. In addition, we will conduct periodic assessments of the electronic health record and review of updated Census data to determine the adequacy and quality of the language assistance provided and determine changes to LEP needs.

In preparing the triennial update of this plan, Colonial Behavioral Health will conduct an internal assessment using the Language Assistance Monitoring Checklist provided in the FTA's "Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Individuals: A Handbook for Public Transportation Providers."

Based on the feedback received from community members and agency employees, Colonial Behavioral Health will make incremental changes to the type of written and oral language assistance provided as well as to their employee training and community outreach programs. The cost of proposed changes and the available resources will affect the enhancements that can be made, and therefore Colonial Behavioral Health will attempt to identify the most cost-effective approaches.

As the community grows and new LEP groups emerge, Colonial Behavioral Health will strive to address the needs for additional language assistance.

## **XI. MINORITY REPRESENTATION ON PLANNING AND ADVISORY BODIES**

Title 49 CFR Section 21.5(b)(1)(vii) states that a recipient may not, on the grounds of race, color, or national origin, “deny a person the opportunity to participate as a member of a planning, advisory, or similar body which is an integral part of the program.”

Colonial Behavioral Health has established an Advisory Council to the Board of Directors, comprised of individuals currently receiving services and/or their family members; to receive input from individuals with lived experience of mental health, substance use disorders and/or developmental disabilities to help inform the CBH Board. The Advisory Council will begin in January 2025 and meet at least quarterly.

Colonial Behavioral Health’s Board of Directors are chosen by the localities served by Colonial Behavioral Health (James City County, City of Poquoson, City of Williamsburg, and York County), and the board’s makeup is statutorily set in the Code of Virginia (§ 37.2-501).

**[SEE APPENDIX E - TABLE MINORITY REPRESENTATION ON COMMITTEES BY RACE](#)**

## **XII. MONITORING TITLE VI COMPLAINTS**

As part of the complaint handling procedure, the Title VI Manager investigates possible inequities in service delivery for the route(s) or service(s) about which the complaint was filed. Depending on the nature of the complaint, the review examines span of service (days and hours), frequency, routing directness, interconnectivity with other routes and/or fare policy. If inequities are discovered during this review, options for reducing the disparity are explored, and service or fare changes are planned if needed.

In addition to the investigation following an individual complaint, the Title VI Manager periodically reviews all complaints received to determine if there may be a pattern. At a minimum, this review is conducted as part of preparing the Annual Report and Update for submission to DRPT.



## **APPENDIX A - TITLE VI NOTICE TO THE PUBLIC**

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

Colonial Behavioral Health 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 feel you are being denied participation in or being denied benefits of the transit services provided by Colonial Behavioral Health, or otherwise being discriminated against because of your race, color, national origin, gender, age, or disability, our contact information is:

Title VI Manager

Colonial Behavioral Health 1657 Merrimac Trail

Williamsburg, VA 23185

757-220-3200

[TitleVI@colonialbh.org](mailto:TitleVI@colonialbh.org)

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

- Main Campus (3 buildings), 1651, 1657, and 1659 Merrimac Trail, Williamsburg, VA 23185
- Administrative Office, 473 McLaws Circle, Williamsburg, VA 23185
- York-Poquoson Office, 3804 George Washington Memorial Highway, Yorktown, VA 23692
- Capitol Landing Office, 921 Capitol Landing Road, Williamsburg, VA 23185
- People's Place, 111 Warwick Court, Williamsburg, VA 23185
- Group Homes (2 locations), private addresses within Colonial Behavioral Health's service area

## APPENDIX C - TITLE VI COMPLAINT FORM



### Colonial Behavioral Health Title VI Complaint Form

<b>Section I</b>		
Name:		
Address:		
Telephone (Home/Cell):	Telephone (Work):	
Email Address:		
Accessible Format	<input type="checkbox"/> Large Print	<input type="checkbox"/> Audio
Requirements?	<input type="checkbox"/> TDD	<input type="checkbox"/> Other
<b>Section II</b>		
Are you filing this complaint on your own behalf?	<input type="checkbox"/> Yes*	<input type="checkbox"/> No
*If you answered "yes" to this question, go to Section III.		
If not, provide 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.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<b>Section III</b>		
I believe the discrimination I experienced was based on (check all that apply):		
<input type="checkbox"/> Race	<input type="checkbox"/> Color	<input type="checkbox"/> National Origin
Date of Alleged Discrimination (Month, Day, Year):		
<p>Explain as clearly as possible what happened and why you believe you were discriminated against.</p> <p>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 the names and contact information of any witnesses. If more space is needed, use the back of this form.</p>		
<b>Section IV</b>		
Have you previously filed a Title VI complaint with this agency?	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Section V		
Have you filed this complaint with any other Federal, State or local agency, or with any Federal or State court?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
If yes, check all that apply:		
Federal Agency: <input type="checkbox"/>	State Agency: <input type="checkbox"/>	
Federal Court: <input type="checkbox"/>	Local Agency: <input type="checkbox"/>	
State Court: <input type="checkbox"/>		
Please provide information about a contact person at the agency/court where the complaint was filed.		
Name:		
Title:		
Agency:		
Address:		
Telephone number:		
Section VI		
Name of agency complaint is against:		
Contact person:		
Title:		
Telephone number:		
You may attach any written materials or other information that you think is relevant to your complaint.		
Signature and date required below.		
Signature	Date	
<p>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 Colonial Behavioral Health's Title VI Manager. The complaint shall be submitted within <b>180 days of the alleged act of discrimination</b> to:</p> <p style="text-align: center;"> <b>Colonial Behavioral Health</b>  <b>C/o: Title VI Manager</b>  <b>1657 Merrimac Trail</b>  <b>Williamsburg, VA 23185</b>  <b>or <a href="mailto:TitleVI@colonialbh.org">TitleVI@colonialbh.org</a>.</b> </p>		
Office Use Only		
Date received	Received by	

en español



## Formulario de queja de Colonial Behavioral Health conforme al Título VI

<b>Sección I</b>	
Nombre:	
Dirección:	
Teléfono (residencial/celular):	Teléfono (trabajo):
Dirección de correo electrónico:	
¿Requerimientos de formatos accesibles? <input type="checkbox"/> Letra grande <input type="checkbox"/> TDD <input type="checkbox"/> Audio <input type="checkbox"/> Otro	
<b>Sección II</b>	
¿Presenta esta queja en nombre propio? <input type="checkbox"/> Sí* <input type="checkbox"/> No	
* Si respondió "Sí" a esta pregunta, pase a la Sección III.	
En caso contrario, indique el nombre y la relación con la persona por quien presenta la queja.	
Explique por qué la presenta en nombre de un tercero.	
Confirme que obtuvo el permiso de la parte perjudicada si está presentando la queja en nombre de un tercero. <input type="checkbox"/> Sí <input type="checkbox"/> No	
<b>Sección III</b>	
Considero que la discriminación de la que fui víctima se basó en (marque todo lo que corresponda):	
<input type="checkbox"/> Raza <input type="checkbox"/> Color <input type="checkbox"/> Origen nacional	
Fecha de la presunta discriminación (día, mes, año):	
Explique de la manera más clara posible lo sucedido y por qué considera que fue discriminado. Identifique a todas las personas involucradas. Incluya el nombre y la información de contacto de la(s) persona(s) que le discriminaron (si la[s] conoce) al igual que el nombre e información de contacto de algún testigo. Si necesita más espacio, utilice el reverso de este formulario.	

<b>Sección IV</b>	
¿Presentó anteriormente una queja en virtud del Título VI ante esta agencia? <input type="checkbox"/> Sí <input type="checkbox"/> No	
<b>Sección V</b>	
¿Presentó esta queja ante alguna otra agencia federal, estatal o local o ante algún tribunal federal o estatal?	
<input type="checkbox"/> Sí <input type="checkbox"/> No	
Si la respuesta es “Sí”, marque todas las que correspondan:	
<input type="checkbox"/> Agencia federal <input type="checkbox"/> Agencia estatal <input type="checkbox"/> Agencia local <input type="checkbox"/> Tribunal federal <input type="checkbox"/> Tribunal estatal	
Proporcione información sobre alguna persona de contacto en la agencia/tribunal donde se presentó la queja.	
Nombre:	
Cargo:	
Agencia:	
Dirección:	
Teléfono:	
<b>Sección VI</b>	
Nombre de la agencia contra la que se presenta la queja:	
Persona de contacto:	
Cargo:	
Teléfono:	
Puede adjuntar cualquier material escrito o cualquier otro tipo de información que considere relevante para su queja.	
Firma y fecha requeridas a continuación.	
Firma	Fecha

Cualquier individuo, grupo de individuos o entidad que crea que ha sido objeto de discriminación por motivos de raza, color u origen nacional puede presentar una queja por escrito ante el Gerente del Título VI de Colonial Behavioral Health. La queja deberá presentarse dentro de los 180 días posteriores al presunto acto de discriminación a:

**Colonial Behavioral Health**  
**C/o: Title VI Manager**  
**1657 Merrimac Trail**  
**Williamsburg, VA 23185**  
or [TitleVI@colonialbh.org](mailto:TitleVI@colonialbh.org).

Uso exclusivo de oficina	
Fecha de recepción	Recibido por

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

None to date.



## APPENDIX E - TABLE MINORITY REPRESENTATION ON COMMITTEES BY RACE

Colonial Behavioral Health is governed by a Board of Directors, comprised in its entirety of appointed representatives from each of the four jurisdictions (James City County, City of Poquoson, City of Williamsburg, and York County).

	Black or African American	White or Caucasian	Latino/ Hispanic	American Indian or Alaksa Native	Asian	Native Hawaiian or other Pacific Islander	Other	Total
Board of Directors	2	12	-	-	1	-	-	15