

# **Title VI Plan for Chester County Sub-recipient**

Rover Community Transportation

July 17, 2017

Prepared by: James E. Oughton, Contract Manager

## **I. Non-Discrimination Policy Statement**

It is the policy of Rover Community Transportation that no person shall on the grounds of race, color, national origin, sex, disability, or age, be excluded from participation in, be denied the benefits of, or be subjected to discrimination in any operation of Rover Community Transportation as provided by Title VI of the Civil Rights Act of 1964 and related statutes.

This policy applies to all operations of Rover Community Transportation, including its contractors and anyone who acts on behalf of Rover Community Transportation. This policy also applies to the operations of any department or agency to which Rover Community Transportation extends federal financial assistance. Federal financial assistance includes grants, training, use of equipment, donations of surplus property, and other assistance.

Prohibited discrimination may be intentional or unintentional. Seemingly neutral acts that have disparate impacts on individuals of a protected group and lack a substantial legitimate justification are a form of prohibited discrimination. Harassment and retaliation are also prohibited forms of discrimination.

Examples of prohibited types of discrimination based on race, color, national origin, sex, disability, or age include: Denial to an individual any service, financial aid, or other benefit; Distinctions in the quality, quantity, or manner in which a benefit is provided; Segregation or separate treatment; Restriction in the enjoyment of any advantages, privileges, or other benefits provided; Discrimination in any activities related to highway and infrastructure or facility built or repaired; and Discrimination in employment.

Title VI compliance is a condition of receipt of federal funds. The Title VI Coordinator is authorized to ensure compliance with this policy, Title VI of the Civil Rights Act of 1964, 42 U.S.C § 2000d and related statutes, and the requirements of 23 Code of Federal Regulation (CFR) pt. 200 and 49 CFR pt. 21.

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(Wayne A. Robinson)

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Date

## **II. Organization, Staffing, and Structure**

Gary D. Krapf is ultimately responsible for assuring full compliance with the provisions of Title VI of the Civil Rights Act of 1964 and related statutes and has directed that non-discrimination is required of all agency employees, contractors, and agents pursuant to 23 CFR Part 200 and 49 CFR Part 21.

Rover has created the position of Contract Manager to perform the duties of the Title VI Coordinator and ensure implementation of agency's Title VI program. The position of Contract Manager is located within Rover.

The Title VI Coordinator is responsible for:

- Submitting a Title VI plan and annual reports on the agency's behalf;
- Developing procedures for the prompt processing and disposition of complaints;
- Investigating complaints, compiling a complaint log, and reporting to CDOT.
- Developing procedures for the collection and analysis of statistical data.
- Developing a program to conduct Title VI reviews of program areas;
- Conducting annual Title VI assessments of pertinent program areas;
- Developing Title VI information for dissemination;
- Establishing procedures for resolving deficiency status and reducing to writing the remedial action agreed to be necessary.

### III. Title VI Complaint Procedures

#### Discrimination Complaint Procedure for Rover.

Federal law prohibits discrimination on the basis of race, color, national origin, age, sex, or disability in any Rover program or activity. This prohibition applies to all branches of Rover, its contractors, consultants, and anyone else who acts on behalf of Rover.

Federal law requires that Rover investigate, track, and report discrimination complaints. Complaints must be filed in writing and will be investigated within sixty days of submission. If you need assistance to file your complaint or need interpretation services, please contact Rover Contract Manager or designee.

#### Who is eligible to file a complaint?

Anyone who believes they have been excluded from participation in, denied the benefits of, or otherwise subjected to discrimination under any Rover program or activity because of their race, color, national origin, age, sex, or disability may file a complaint.

Discrimination includes lack of access, harassment, retaliation and disparate impacts from a program or activity. Harassment includes a wide range of abusive and humiliating verbal or physical behaviors. Retaliation includes intimidating, threatening, coercing, or engaging in other discriminatory conduct against anyone because they filed a complaint or otherwise participated a discrimination investigation.

#### How do you file a complaint?

Complaints must be filed in writing within 180 days from the last date of the alleged discrimination. However, contact Contract Manger or designee if you believe your complaint may fall outside this deadline.

Reasonable efforts will be made to assist persons with disabilities, non-English speakers, and others unable to file a written complaint. For assistance in filing a complaint, please contact Contract Manager or designee.

Complaints may be submitted via mail, email, fax or in person to:  
Contract Manager  
[Rover-contact@krapfbus.com](mailto:Rover-contact@krapfbus.com) or 484-696-3854

Complaints may also be filed directly with the following agencies:

Rover Community Transportation  
Contract Manager  
1002 S. Chestnut Street

Downingtown, PA 19335  
Rover-contact@krapfbus.com  
Phone: (484) 696-3854  
Fax: (484) 593-0454

### What happens after a complaint is filed?

Title VI complaints must be investigated within sixty days. Investigating a complaint includes interviewing all parties involved and key witnesses. The investigator may also request relevant information such as books, records, electronic information, and other sources of information from all involved parties. You may specify if there is a particular individual or individuals that you feel should not investigate your complaint due to conflict of interest or other reasons.

In some cases, complaints will be forwarded to either the Chester County Department of Human Services. If your complaint is forwarded to one of these agencies, you will be provided the name and contact information of the employee handling your complaint.

Federal law prohibits retaliation against individuals because they have filed a discrimination complaint or otherwise participated in a discrimination investigation. Any alleged retaliation should be reported in writing to the investigator.



Where did the discrimination occur?

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Dates and times discrimination occurred?

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Were there any other witnesses to the discrimination?

Name	Organization/Title	Work Telephone	Home Telephone

How would you like to see this situation resolved?

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Have you filed your complaint, grievance, or lawsuit with any other agency or court?

Who \_\_\_\_\_ When \_\_\_\_\_  
Status (pending, resolved, etc.) \_\_\_\_\_ Result, if known \_\_\_\_\_  
Complaint number, if known \_\_\_\_\_

Do you have an attorney in this matter?

Name \_\_\_\_\_ Phone \_\_\_\_\_  
Address \_\_\_\_\_ City \_\_\_\_\_ Zip \_\_\_\_\_

Signed \_\_\_\_\_ Date \_\_\_\_\_

## **V. Public Participation**

- *Rover reaches out to the various communities that we service, Senior's by visiting all the Senior Centers in Chester County at least 6 times a year. Rover has a bi-lingual representative who attends these meeting to provide outreach to the Latino community.*
- *Rover reaches out to those individuals who are both minority and low income by visiting the Senior Centers in their communities, Mental Health facilities and other community events.*
- *Rover has to bi-lingual Spanish speaking representatives that can assist Spanish speaking consumers. All other non-English speaking consumers are addressed by use of the third party interpreter service.*
- *Rover is a demand ride service only and therefore community feedback is valuable in understanding our efficiencies and deficiencies, quarterly in conjunction with the Chester County Human Services Department we hold public meetings. Transportation to these meetings is provided by Rover.*



## **VI. Notice of Rights**

### **Your Rights Against Discrimination under Title VI of the Civil Rights Act of 1964**

ROVER Community Transportation assures full compliance with Title VI of the Civil Rights Act of 1964, as amended and its related statutes. No person is excluded from participation in, denied the benefits of its services, or otherwise subjected to discrimination on the grounds of race, color, or national origin, as provided by Title VI of the Civil Rights Act of 1964, as amended.

Any person who believes that he or she has been unlawfully discriminated against may file a formal complaint with ROVER Community Transportation within 180 days following the date of the alleged incident.

For more information regarding civil rights complaints, please contact:

Rover Community Transportation  
1002 S Chestnut St  
Downingtown, PA 19335  
(484)-696-3854  
[Rover-contact@krapfbus.com](mailto:Rover-contact@krapfbus.com)

Or

Chester County Department of Community Development  
610 Westtown Rd, Suite 365  
West Chester, PA 19380-0991  
[ccdcd@chesco.org](mailto:ccdcd@chesco.org)

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

Federal Transit Administration Office of Civil Rights  
1200 New Jersey Avenue SE  
Washington, DC 20590

Or

U.S. Department of Transportation  
Federal Administration's Office of Civil Rights Region 3  
1760 Market Street, Suite 500  
Philadelphia, PA 19103-4124