

Title VI Plan and Procedures
Title VI of the Civil Rights Act of 1964
PLUS RELATED AUTHORITIES AND GUIDANCE

Town of Chincoteague, Inc.

1/17/2013

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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 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).

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 *Town of Chincoteague, Inc.* incorporates nondiscrimination policies and practices in providing public transportation services to the public. *Town of Chincoteague, Inc.*'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. POLICY STATEMENT AND AUTHORITIES

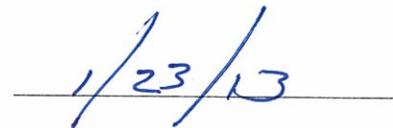
Title VI Policy Statement

Town of Chincoteague, Inc. 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 *Town of Chincoteague, Inc.* Title VI Manager is responsible for initiating and monitoring Title VI activities, preparing required reports that are identified by the grant agency and other responsibilities as required by Title 23 Code of Federal Regulations (CFR) Part 200, and Title 49 CFR Part 21.



Robert Ritter, Town Manager



Date

Authorities and Guidance

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 Persons, (December 14, 2005), and Section 12 of FTA's Master Agreement, FTA MA 13 (October 1, 2006).

Annual Nondiscrimination Assurance to the Virginia Department of Rail and Public Transportation (DRPT)

As part of the Certifications and Assurances submitted to the DRPT with the Annual Grant Application and all Federal Transit Administration grants submitted to the VDRPT, *Town of Chincoteague, Inc.* submits a Nondiscrimination Assurance which addresses compliance with Title VI as well as nondiscrimination in hiring (EEO) and contracting (DBE), and nondiscrimination on the basis of disability (ADA). In signing and submitting this assurance, *Town of Chincoteague, Inc.* confirms to VDRPT the agency's commitment to nondiscrimination and compliance with federal and state requirements.

III. ORGANIZATION AND TITLE VI PROGRAM RESPONSIBILITIES

The *Town of Chincoteague, Inc.*'s *Town 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

Title VI Manager and **Director of Transportation** are 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.

- **Robert Ritter, Title VI manager and Alex Hubb, Director of Transportation** are responsible for public outreach and involvement. This includes development and implementation of the Limited English Proficiency (LEP) plan if needed. Those responsible for this area also coordinate with those who are responsible for service planning and delivery.
- **Robert Ritter, Title VI manager and Alex Hubb, Director of Transportation** are responsible for service planning and delivery. This includes analysis of current services, analysis of proposed service and fare changes, and environmental justice as needed. Those responsible for this area also coordinate with those who are responsible for service planning and delivery.

Detailed Responsibilities of the Title VI Manager

The Title VI Manager is responsible for supervising the other staff assigned with Title VI responsibilities in implementing, monitoring, and reporting on *Town of Chincoteague, Inc.*'s compliance with Title VI regulations. In support of this, the Title VI Manager will:

- Identify, investigate, and eliminate discrimination when found to exist.
- Process Title VI complaints received by *Town of Chincoteague, Inc.* in accordance with the agency's Nondiscrimination Complaint Procedures (presented below).
- Meet with the **Director of Transportation, Alex Hubb**, periodically to monitor and discuss progress, implementation, and compliance issues.
- Periodically review the agency's Title VI program to assess if administrative procedures are effective, staffing is appropriate, and adequate resources are available to ensure compliance.

Annual Review of Title VI Program

Each year, in preparing for the Annual Report and Updates, the Title VI Manager and Director of Transportation 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.

Title VI Clauses in Contracts

In all Federally funded procurements requiring a written contract, *Town of Chincoteague, Inc.*'s contract will include the federal non-discrimination clauses.

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

Town of Chincoteague, Inc. includes the following language on all printed information materials, on brochures available on the interior of each vehicle operated in passenger service and on the agency's website.

"The Pony Express, Town of Chincoteague, Inc. is committed to ensuring that no person is excluded from participation in or denied benefits of the transit service we offer. This policy is consistent with the requirements of Title VI of the 1964 Civil Rights Act.

If you believe you have been subjected to unequal treatment because of race, color, or national origin, then you have the right to file a formal complaint. Complaints may be filed within 180 days following the date of the alleged discriminatory action.

For more information, or to file a complaint, you may contact us by mail, telephone or email:

Robert Ritter, Town Manager, Title VI manager or

Alex D. Hubb, Director of Transportation"

“The Pony Express, Town of Chincoteague, Inc.

6150 Community Drive, Chincoteague, VA 23336

Phone: 757-336-6519 Email: alex@chincoteague-va.gov

Please note: The complaint should include the following information:

Your name, address and how to contact you (i.e. telephone number, email address, etc.).

How, when, where, and why you believe you were discriminated against.

The location, names and contact information of any witnesses.”

V. PROCEDURES FOR HANDLING, TRACKING, RESOLVING AND REPORTING INVESTIGATIONS/COMPLAINTS AND LAWSUITS

Any individual may exercise his or her right to file a complaint with *Town of Chincoteague, Inc.* if that person believes that s/he 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. *Town of Chincoteague, Inc.* will report the complaint to DRPT within three business days (per DRPT requirements), and make a concerted effort to resolve complaints locally, using the agency’s Nondiscrimination Complaint Procedures, as described below. All Title VI complaints and their resolution will be logged as described under “Data collection” and reported annually (in addition to immediately) to DRPT.

Should any Title VI investigations be initiated by FTA or DRPT, or any Title VI lawsuits be filed against *Town of Chincoteague, Inc.* the agency will follow these procedures:

Provide all information to the Town Attorney. Immediately take action to stop the alleged violation up to and including suspension of transportation services until the investigation or lawsuit is resolved.

We will provide a complaint handling procedure that is able to distinguish complaints based on race, color and national origin from other complaints such as ADA and Section 504.

Overview

These procedures apply to all complaints filed under Title VI of the Civil Rights Act of 1964 as amended, and the Civil Rights Restoration Act of 1987, relating to any Federally funded program or activity administered by *Town of Chincoteague, Inc.*, as well as to sub-recipients, consultants, and/or contractors. Intimidation or retaliation of any kind is prohibited by law. These procedures do not deny the right of the complainant to file formal complaints with other state or federal agencies, or to seek private counsel for complaints alleging discrimination.

These procedures are part of an administrative process that does not provide for remedies that include punitive damages or compensatory remuneration for the complainant. Every effort will be made to obtain early resolution of complaints at the lowest level possible. The option of informal mediation

meeting(s) between the affected parties and the Title VI Manager may be utilized for resolution. The Title VI Manager and a representative of VDRPT will make every effort to pursue a resolution to the complaint. Initial interviews with the complainant and the respondent will request information regarding specifically requested relief and settlement opportunities.

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 *Town of Chincoteague, Inc.'s* Title VI Manager. The complaint is to be filed in the following manner:
 - a. A formal complaint must be filed within 180 calendar days of the alleged occurrence.
 - b. The complaint shall be in writing and signed by the complainant(s).
 - c. 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
 - indication of any related complaint activity (i.e., was the complaint also submitted to DRPT or FTA?)
 - d. The complaint shall be submitted to the *Town of Chincoteague, Inc.* Title VI Manager at 6150 Community Drive, Chincoteague, VA 23336.
 - e. Complaints received by any other employee of *Town of Chincoteague, Inc.* will be immediately forwarded to the Title VI Manager.
 - f. 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 **staff member best suited** will assist the complainant in converting the verbal allegations to writing.
2. Upon receipt of the complaint, the Title VI Manager will immediately:
 - a. notify DRPT (no later than 3 business days from receipt)
 - b. notify the *Town of Chincoteague, Inc.* CEO
 - c. ensure that the complaint is entered in the complaint database
3. Within 3 business days of receipt of the complaint, the Title VI Manager will contact the complainant by telephone to set up an interview.
4. 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.
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 the opportunity to respond to all aspects of the complainant's allegations.
7. The Title VI Manager will determine, based on 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 writing the final report, and give the complainant an opportunity to give a rebuttal statement at the end of the investigation process.
11. 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 persons interviewed, findings, and recommendations for disposition. This report will be provided to the CEO, the DRPT, and, if appropriate, *Town of Chincoteague, Inc.'s* legal counsel.
12. 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 that will be followed to correct the situation. If the complaint is determined to be unfounded, the letter will explain the reasoning, and refer the complainant to DRPT in the event the complainant wishes to appeal the determination. This letter will be copied to DRPT.
13. 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 after reasonable attempts.
 - c. The complainant fails to respond to repeated requests for additional information needed to process the complaint.
14. DRPT will serve as the appealing forum to a complainant that is not satisfied with the outcome of an investigation conducted by *Town of Chincoteague, Inc.* DRPT will analyze the facts of the case and will issue its conclusion to the appellant according to their procedures.

Town of Chincoteague
Department of Transportation



Complaint Form

Thank you for choosing to ride on the Pony Express Trolley. If you have a complaint or suggestion regarding the service you received, please complete the following form.

For any individual, group of individuals, or entity that believes they have been subjected to discrimination on the basis of race, color, or national origin, a written complaint must be filed with the Town of Chincoteague's Director of Transportation Services or Town Manager. A formal complaint must be filed within 180 calendar days of the alleged occurrence. The complaint shall be in writing and signed by the complainant(s).

Describe your complaint or suggestion in the space provided. For a Title IV discrimination complaint complete the questions on the back of this form.

If you require assistance in completing this form, please call the Town of Chincoteague at (757)336-6519 or visit the Town Office at 6150 Community Drive, Chincoteague, Virginia during normal working hours (Monday thru Friday from 8am to 5pm)

Provide the following information for any complaint based on discrimination:

Name, address, and contact information (i.e., telephone number, email address, etc.)

Date(s) of the alleged act of discrimination

Description of the alleged act of discrimination

Location(s) of the alleged act of discrimination (include vehicle number if appropriate)

Explanation of why the complainant believes the act to have been discriminatory on the basis of race, color, and national origin

Names and/or job titles of those individuals perceived as parties in the incident

Contact information for any witnesses

Describe any related complaint activity (i.e., was the complaint also submitted to DRPT or FTA?)

The complaint shall be submitted to the Town of Chincoteague, Inc. Town Manager at 6150 Community Drive, Chincoteague, Virginia 23336. Complaints received by any other employee of the Town of Chincoteague will be immediately forwarded to the Town Manager.

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 Town Manager (Title VI Manager). Under these circumstances, the complainant will be interviewed, and the **Director of Transportation Services** will assist the complainant in converting the verbal allegations to writing.

VI. STAFF TRAINING RELATED TO THE TITLE VI PROGRAM

Information on the *Town of Chincoteague, Inc.*'s Title VI program is disseminated to agency employees 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.

Town of Chincoteague, Inc.'s employees will receive training on Title VI policies and procedures annually in May prior to the transit season upon hiring and upon promotion. This training will include requirements of Title VI, *Town of Chincoteague, Inc.*'s obligations under Title VI (LEP requirement included), required data that must be gathered and maintained and how it relates to the Annual Report and Update to DRPT, and any findings and recommendations from the last DRPT compliance review. A line item notating Title VI training and awareness will be added to the Contract of Understanding for trolley staff.

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 (which may be for a specific individual or for the entire agency, depending on the complaint).

Title VI training is the responsibility of *Robert Ritter, Title VI Manager and the Director of Transportation.*

LANGUAGE ASSISTANCE PLAN FOR PERSONS 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 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. An LEP language implementation plan will be developed when a need is identified by *Town of Chincoteague, Inc.* is based on FTA guidelines.

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 Persons 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 (2006-2010)

Data from the U.S. Census Bureau’s American Community Survey (ACS) were obtained through www.census.gov by *Town of Chincoteague, Inc.*’s service area. The agency’s service area includes a total of 135 persons (out of a population of 4041) with Limited English Proficiency (those persons who indicated that they spoke English “not well,” and “not at all” in the 2006-2010 ACS Census).

Information from the 2006-2010 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. These data indicate the extent to which translations into other language are needed to meet the needs of LEP persons.

• Spanish	[27]	[1.30%]
• Indo-European	[0]	[0]
• Asian and Pacific Island Languages	[0]	[0]
• Other Languages	[0]	[0]

It is noted that there are relatively low number of LEP persons in the service area - no language is spoken by over 5% or a total of 1,000 persons in the LEP population.

Factor 2 Assessment of frequency with which LEP individuals come into contact with the transit services or system.

We will continue to identify emerging populations as updated Census and American Community Survey data become available for our service area and adjust the program as needed.

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

Town of Chincoteague, Inc. **does not currently** provide programs, activities and services due to our minimal LEP population and lack of identified need. We will continue to monitor population change in the future and add offerings as needed.

Factor 4: Assessment of the Resources Available to the Agency and Costs

We do not anticipate that these activities and costs will increase in the near future. Budgets in the future will reflect need assessed. Staff training would be added as need is assessed.

Monitoring/updating the plan

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

As the community grows and new LEP groups emerge, **Town of Chincoteague, Inc.**

will strive to address the needs for additional language assistance if needed.

LIMITED ENGLISH PROFICIENCY IMPLEMENTATION PLAN

Through the four factor analysis, Town of Chincoteague, Inc. has determined that a written Language Implementation Plan is not required at this time which is permissible under FTA Circular C4702.1A. Town of Chincoteague, Inc. understands that the absence of a written LEP plan does not obviate the underlying obligation to ensure meaningful access by LEP persons to our program or activities. When appropriate, Town of Chincoteague, Inc. will provide translation of vital documents, provide access to language assistance services, and provide staff training on policies and procedures related to assisting LEP persons.

PUBLIC OUTREACH AND INVOLVEMENT

Public outreach and involvement applies to and affects **Town of Chincoteague, Inc.**'s mission and work program as a whole, particularly agency efforts and responsibilities related to **Town of Chincoteague, Inc.**'s service planning. The overall goal of **Town of Chincoteague, Inc.**'s public outreach and involvement policy is to secure meaningful public notification about, and participation in, major actions and decisions by **Town of Chincoteague, Inc.** In seeking public comment and review, **Town of Chincoteague, Inc.** makes a concerted effort to reach all segments of the population.

Public Outreach Activities

Town of Chincoteague, Inc. will take steps to ensure that minority, low-income, and LEP members of the community have meaningful access to public outreach and involvement activities when the need of additional public outreach is identified.

Public notices appear currently in local newspaper publication, and in the form of a glossy tri fold brochure, web page and cable TV advertisement. Any changes to our program would be announced in this format. The above activities are the responsibility of **Alex Hubb, Director of Transportation.**

Non Elected Board Diversity

Town of Chincoteague, Inc. does not have a Transit Advisory Board but will consider one in the future as the need arises.

VII. PROCEDURES FOR ENSURING EQUITY IN SERVICE PROVISION

Town of Chincoteague, Inc. is required to plan and deliver transportation services in an equitable manner. This means the distribution of service levels and quality is to be equitable between minority and low income populations and the overall population.

Service Standards and Policies

Town of Chincoteague, Inc. has reviewed its services and policies to ensure that those services and

benefits are provided in an equitable manner to all persons. Our transit trolley service is a fixed route which serves a tourist population as well as the local citizens equally throughout the Town. Service standards were reviewed and adopted in the Town of Chincoteague, Inc. TDP in 2012.

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 the DRPT.

Fare and Service Changes

Town of Chincoteague, Inc. follows its adopted written policy for the public comment process for major service reductions and fare increases. With any proposed service or fare change, **Town of Chincoteague, Inc.** will consider the relative impacts on, and benefits to, minority and low income populations, including LEP populations. All planning efforts for changes to existing services or fares, as well as new services, have a goal of providing equitable service. No change is anticipated at this time due to the record of successful operations.

VIII. DATA COLLECTION AND REPORTING PROCEDURES

Data collection

To ensure that Title VI reporting requirements are met, **Town of Chincoteague, Inc.** maintains:

- A log and file of Title VI complaints received. The investigation of and response to each complaint is tracked and recorded in the program file. *A blank complaint form is attached. (A spreadsheet with date received, submission method (email, letter, website, in person, by phone, customer feedback form, other survey), individual submitting, date of incident, description of incident, date complaint reported to DRPT, how reported to DRPT (email, phone or letter), language of complainant, investigation, findings, response to individual, changes made as a result of complaint or other outcomes.)*
- A log of the public outreach and involvement activities undertaken to ensure that minority and low-income populations have meaningful access to these activities. The agency maintains the following records related to public outreach and involvement:
 - Paper files with copies of materials published or distributed for each planning project and service/fare change, as well as all news releases, public service announcements, surveys, and written summaries of in-person outreach events.

- A log/database of public outreach and involvement activities, including dates, planning project or service/fare change supported (if applicable), type of activity, LEP assistance requested/provided, target audience, number of participants, and location of documentation within paper files. Maintenance of these records is the responsibility of the Town Manager and the Director of Transportation.

Annual Report and Triennial Updates

Annual Reporting

As a subrecipient providing service in an area with less than 200,000 population, **Town of Chincoteague, Inc** submits an annual report to the DRPT that documents any Title VI investigations/complaints/lawsuits during the preceding 12 months.

Triennial Reporting

Every three years, the **Town of Chincoteague, Inc.** submits to DRPT, a complete list of the investigations/complaints/lawsuits received in the prior three years, a summary of the public outreach and involvement activities undertaken to ensure that minority and low-income populations have a meaningful access to these activities, and any updates to this Title VI plan.

Updates to the Title VI Plan

As noted above, every three years, the **Town of Chincoteague, Inc.** submits to DRPT an update to this Title VI Plan. The triennial Title VI update includes the following items, 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 previous 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
- **Town of Chincoteague, Inc.**'s Limited English Proficiency (LEP) plan, if needed.
- **Town of Chincoteague, Inc.**'s procedures for tracking and investigating Title VI complaints
- A complete list of Title VI investigations, complaints or lawsuits filed with the **Town of Chincoteague, Inc.** since the last submission
- A copy of **Town of Chincoteague, Inc.**'s agency's notice to the public that it complies with Title VI and instructions on how to file a discrimination complaint

IX. Environmental Justice For All Federally Funded Construction Projects)

For new construction and major rehabilitation or renovation projects where National Environmental Policy Act (NEPA) documentation is required, **Town of Chincoteague, Inc.** will integrate an environmental justice analysis or update of the TDP into the NEPA documentation for submission to DRPT. The development of environmental justice analyses is the responsibility of the Town Manager or partner of the grant agency