Title VI Plan and Procedures

Title VI of the Civil Rights Act of 1964

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For 2027 – 2029

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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).

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. The Federal Transit Administration (FTA) continues to place emphasis on Title VI issues, including providing meaningful access to persons with Limited English Proficiency and ensuring individuals are not discriminated against. 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 federal and state transit dollars are used in a manner that is nondiscriminatory as required under Title VI.

This document details how SOAR365 incorporates nondiscrimination policies and practices in providing services to its clients. SOAR365'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.

SOAR365 is a nonprofit human-services organization and does not operate fixed-route public transit or public on-demand transit. DRPT-funded vehicles, equipment, or transportation activities support access to SOAR365 participant activities. Transportation is scheduled and provided within the scope of those programs and is not offered as a general public route, fare-based service, or individually requested public demand-response service. SOAR365 applies Title VI protections to all DRPT-funded transportation activities and to the programs and services supported by those activities. Requirements directed specifically to fixed-route operators, fare changes, route changes, transit stops, or large-system service monitoring are not applicable unless SOAR365's operations change.

II. OVERVIEW OF SERVICES

SOAR365 provides services for individuals of all ages and all levels of disability. Core programs are as follows:

Pediatric Therapy: SOAR365's Pediatric Therapy program for young children with disabilities helps them achieve their fullest potential. Parents gain confidence and skills to care for their children. Children under the age of three participate in these therapies in their homes (Early Intervention); those 36 months and older visit the outpatient clinic at our Saunders Avenue location. Staff include speech, occupational, and physical therapists, and early childhood educators, all with pediatric experience, working to help each child with their unique needs. We partner with families, so they are prepared and confident in helping their children. We served nearly 1,100 youth in 2025 and anticipate exceeding that number in 2026.

Adult Day Support Program: In 2025 and 2026, over 170 adults with severe and/or complex disabilities participated in volunteer, recreation, leisure, and daily living activities. Participation in the program means that families are free to participate in daily routines like employment or caring for other family members. Each participant has an Individualized Service Plan to help inform their daily activities. They work on life skills like safety, shopping, cooking, personal hygiene, and money management; they explore and express themselves creatively through art, music, and other interest-inspired classes. They are encouraged to interact and socialize with others – often through community activities like volunteering and cultural and sports-related experiences and receive support to maintain health and wellness through regular exercise, nutrition counseling, and medication management.

Employment Services Programs: Individuals with disabilities have the highest unemployment rate of any group of people and the Supported Employment Program provides participants with opportunities for gainful employment with needed supports. In 2025, SOAR365 served 196 participants in Supported Employment, more than double the number served in 2023, helping people complete job applications, write resumes, prepare for interviews, and maintain employment. Employment Specialists provide job coaching and work with employers to help them manage these employees in the context of their specific disability. SOAR365 also provides Pre-Employment Transition Services to help high school students with disabilities as they prepare to enter the workforce. Sixty-eight youth participated in this service in 2025.

Summer Camp and Respite Programs: In 2025, 275 different campers attended summer camp, filling 415 spots. This program offers a welcoming, fully accessible camp for both youth and adults with disabilities, filled with outdoor fun under the care of highly trained and compassionate counselors and a full-time nurse. Campers enjoy typical camp activities at our rustic 22-acre Camp Baker facility in Chesterfield County, such as swimming, fishing, and horseback riding, making new friendships and renewing old ones. There are ten one-week overnight sessions, with day-only session options. Eight weeks are designated for adults and two for children and youth.

SOAR365's residential Respite program is available on weekends throughout the year, and planned emergency Respite is available on an as-needed basis. Participants enjoy unique experiences at Camp Baker that cannot be replicated at home or in a typical day program. The

program promotes exploration and learning, independence, wellness, and friendship. The Respite program served 40 individuals in 2025, providing a relief for the family members who care for them throughout the year.

With the exception of Pediatric Therapy, these services transport individuals throughout the region, allowing them to participate in employment related or recreational and social opportunities.

III. POLICY STATEMENT AND AUTHORITIES

Title VI Policy Statement

SOAR365 is committed to ensuring that no person shall, on the grounds of race, color, or 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.

SOAR365's Title VI Manager is responsible for implementing and monitoring SOAR365's Title VI activities, preparing required reports, and other responsibilities required by Title VI of the Civil Rights Act of 1964, 49 CFR Part 21, and other applicable requirements, such as those established by DRPT.

Jonina L Moskowitz

Signature of Authorizing Official
Jonina L. Moskowitz

10/22/2026

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-2000d-7); Federal Transit Laws, as amended (49 U.S.C. Chapter 53 et seq.); Department of Justice regulation, 28 CFR part 42, Subpart F, "Coordination of Enforcement of Nondiscrimination in Federally-Assisted Programs" (December l, 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/FHWA regulation 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) FTA Circular 4702.1B.

SOAR365 services do not involve owning, acquiring, or developing real property using federal or state transit funds. Therefore, the requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 U.S.C.4601, et seq.) do not apply. Similarly, SOAR365 has no construction or federally funded capital development activities and does not provide on-demand transit services. Therefore, Joint FTA/Federal Highway

Administration (FHWA) regulation, 23 CFR part 771, "Environmental Impact and Related Procedures" (August 28, 1987), and , 23 CFR part 450 and 49 CFR part 613, "Planning Assistance and Standards," (October 28, 1993, unless otherwise noted)do not apply. The organization does not currently conduct projects or activities requiring a formal Environmental Justice analysis. Should future federally funded projects trigger Environmental Justice review requirements, the organization will comply with applicable U.S. Department of Transportation and Federal Transit Administration guidance such as US 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)

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 carry out 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 the FTA. DRPT collects Title VI assurances from sub-recipients prior to passing through FTA funds.

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 DRPT, SOAR365 submits a Nondiscrimination Assurance which addresses compliance with Title VI as well as nondiscrimination in hiring (EEO) and contracting through the Disadvantaged Business Enterprise Program (DBE), and nondiscrimination on the basis of disability (ADA).

In signing and submitting this assurance, SOAR365 confirms its commitment to nondiscrimination and compliance with federal and state requirements.

V. PLAN APPROVAL DOCUMENT

Title VI Plan Approval

SOAR365

I hereby acknowledge the receipt of SOAR365's VI Implementation Plan for 2027 – 2029. I have reviewed and approve the Plan. I am committed to ensuring that no person is excluded from participation in or denied the benefits of transportation services on the basis of 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.

Signature of Authorizing Official

10/20/26
Date

Tom Cricchi
Chair, SOAR365 Board of Directors

VI. ORGANIZATION AND TITLE VI PROGRAM RESPONSIBILITIES

SOAR365's Vice President (VP) of Compliance (Title VI 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 VP of Compliance/Title VI Manager and Compliance staff are responsible for coordinating the overall administration of theTitle 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 SOAR365's programs, (e.g., affected citizens, and impacted communities).

3. Conduct annual Title VI reviews to determine the effectiveness of programactivities at all levels.

4. Conduct Title VI reviews of construction contractors, consultant contractors, suppliers, and other recipients of federal-aid fund contracts administered through the agency, as applicable.

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

1. Data collection

To ensure that Title VI reporting requirements are met, SOAR365 will maintain a log of Title VI complaints received. The investigation of and response to each complaint is tracked within the database or log.

SOAR365 does not provide on-demand transit services for riders and only provides transportation for people enrolled in Human Services programs. Many of these services are funded by Medicaid, which prohibits direct marketing to recipients of services. Public outreach primarily involves communication with referral sources and community presentations.

2. Annual Report and Updates

As a sub-recipient of FTA funds, SOAR365 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. SOAR365 will also maintain and provide to DRPT an annual basis, the log of public outreach and involvement activities undertaken to ensure that minority and low-income people had a meaningful access to these activities.

Further, SOAR365 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 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, if applicable, to verify that Title VI language and provisions are incorporated, as appropriate.

4. Dissemination of information related to the Title VI program

Information on the 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 they or any other program beneficiaries have been subjected to unequal treatment or discrimination in the receipt of benefits/services prohibited by non-discrimination requirements. SOAR365 will report the complaint to DRPT within three business days (per DRPT requirements), and make a concerted effort to resolve complaints locally, using the organization's TitleVI 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

SOAR365's 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 VP of Compliance/Title VI Manager will determine whether or not an update is needed.

7. Internal education

SOAR365 employees will receive training on non-discrimination, such as Title VI policies and procedures upon hiring. 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. Title VI training is the responsibility of SOAR365's Director of Training and Development.

8. Title VI clauses in contracts

In all federal procurements requiring a written contract or Purchase Order (PO), SOAR365's contract/PO will include appropriate non-discrimination clauses. The Title VI Manager will work with the Chief Financial Officer who is responsible for procurement contracts and PO's 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, SOAR365 disseminates 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), such as the reception desk, meeting rooms, in federally funded vehicles, etc. The Public Notice is included as Appendix A – Title VI Notice to the Public and Appendix B – Title VI Notice to the Public – List of Locations.

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).

SOAR365 includes the following language on posters in the interior of each vehicle operated in passenger (client) service:

SOAR365 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 4702.1 B. If you feel you are being denied participation in or being denied benefits of the transit services provided by SOAR365, or otherwise being discriminated against because of your race, color, national origin, gender, age, or disability, contact:

Name: Nina Moskowitz
Title: VP Compliance
Agency Name: SOAR365
Address: 3600 Saunders Ave
City, State Zip code: Richmond, VA 23227
Telephone Number: (804) 350-6022
Email address: Nina.moskowitz@soar365.org

VIII. TITLE VI COMPLAINT PROCEDURES

Requirement to Develop Title VI Complaint Procedures and Complaint Form

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 their right to file a complaint with SOAR365 if that person believes that they have been subjected to unequal treatment or discrimination in the receipt of transportation benefits or services. SOAR365 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. All Title VI complaints and their resolution will be logged and reported annually (in addition to immediately) to DRPT.

SOAR365 includes the following language on the organization's website and on posters on the interior of each vehicle operated in passenger service. See Appendix C for Title VI Complaint Form.

SOAR365 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 SOAR365, or otherwise being discriminated against because of your race, color, national origin, gender, age, or disability, contact:

Name: Nina Moskowitz
Title: VP Compliance
Agency Name: SOAR365
Address: 3600 Saunders Ave
City, State Zip code: Richmond, VA 23227
Telephone Number: (804) 350-6022
Email address: Nina.moskowitz@soar365.org

Procedures For Handling, Tracking, Resolving, And Reporting Investigations/Complaints and Lawsuits

Should any Title VI investigations be initiated by the FTA or DRPT, or should any Title VI lawsuits be filed against SOAR365, the agency will follow these procedures:

1. Any individual, group of individuals, or entity that believes they have been subjected to discrimination regarding transportation on the basis of race, color, or national origin may file a written complaint with the 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 (e.g., 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 (including vehicle number if appropriate)
      - an explanation of why the complainant believes the act to have been discriminatory on the basis of race, color, or 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., that the complaint was also submitted to DRPT or FTA)
   d. The complaint shall be submitted to the SOAR365's Title VI Manager at 3600 Saunders Ave, Richmond, VA 23227 or Nina.moskowitz@soar365.org .
   e. Complaints received by any other employee of SOAR365 are to 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 Title VI Manager will assist the complainant in converting the verbal allegations to writing.
2. Upon receipt of the complaint, the Title VI Manager will immediately:
   - Ensure the complaint is entered into the complaint log
   - Notify SOAR365's Authorizing Official (Board Chair)
   - notify DRPT (no later than 3 business days from receipt)
3. Within 3 business days of receipt of the complaint, the Title VI Manager or designee 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 may submit any documentation they perceive 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 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:
   - investigating contractor operating records, policies, or procedures
   - reviewing routes and schedules (SOAR365 does not charge fare for transportation)
   - reviewing operating policies and procedures
   - reviewing scheduling and dispatch/vehicle sign-out records
   - 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 drafting the final report and will 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 Authorizing Official, DRPT, and, if appropriate, SOAR365'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:
    - The complainant requests the withdrawal of the complaint.
    - An interview cannot be scheduled with the complainant after reasonable attempts.
    - The complainant fails to respond to repeated requests for additional information neededto process the complaint.
14. DRPT will serve as the appealing forum to a complainant that is not satisfied with the outcome ofan investigation conducted by SOAR365. DRPT will analyze the facts ofthe case and will issue its conclusion to the appellant according to their procedures.

A person may also file a complaint directly with the Federal Transit Administration, Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor – TCR, 1200 New Jersey Avenue SE, Washington, DC 20590.

Transportation-Related Title VI Investigations, Complaints, and Lawsuits

Background

All recipients shall prepare and maintain a list of any of the following that allege discrimination based on 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 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. This is included as 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 SOAR365 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) persons have meaningful access to their programs and activities. This means that public participation opportunities, normally provided in English, should be accessible to persons who have a limited ability to speak, read, write, or understand English.

In addition to language access measures, other major components of the PPP include public participation design factors; a range of public participation methods to provide information, to invite participation and/or to seek input; examples to demonstrate how population-appropriate outreach methods can be and were identified and utilized; and performance measures and objectives to ensure accountability and a means for improving over time.

SOAR365 established a public participation plan or process that will determine how, when, and how often specific public participation activities should take place, and which specific measures are most appropriate. As SOAR365 does not provide on-demand transit services, the primary source of input from the public is the individuals who participate in SOAR365 Human Services programs. This input is obtained in several ways, such as satisfaction surveys, service planning meetings, and day-to-day service delivery and conversations. These opportunities are afforded to all individuals, regardless of minority or LEP status. More than 50% of individuals receiving services belong to a racial minority and all individuals served have at least one disability. SOAR365 does not operate transit stations or stops.

SOAR365 will make these determinations based on a demographic analysis of the population(s) affected, the type of plan, program, and/or service under consideration, and the resources available, as well as targeted measures to address linguistic, institutional, cultural, economic, historical, or other barriers that may prevent minority and LEP persons from effectively participating in our decision-making process. Applicable guidance from FTA Circular, 4703.1, "Environmental Justice Policy Guidance for Federal Transit Administration Recipients" will be incorporated as applicable to the transportation services SOAR365 provides. (SEE APPENDIX E-Summary of Outreach Efforts)

X. LANGUAGE ASSISTANCE PLAN FOR SERVING 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 meet objectives set forth in Title VI of the Civil Rights Act and Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency (LEP). This Executive Order requires federal agencies receiving financial assistance to address the needs of non-English speaking persons. The Executive Order also establishes compliance standards to ensure that the programs and activities that are provided by a transportation provider in English are accessible to LEP communities. This includes providing meaningful access to individuals who are limited in their use of English. The following LEP language implementation plan, developed by SOAR365, is based on FTA guidelines.

Using American Community Survey (ACS) Census data, SOAR365 evaluated 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 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 (2018–2022)

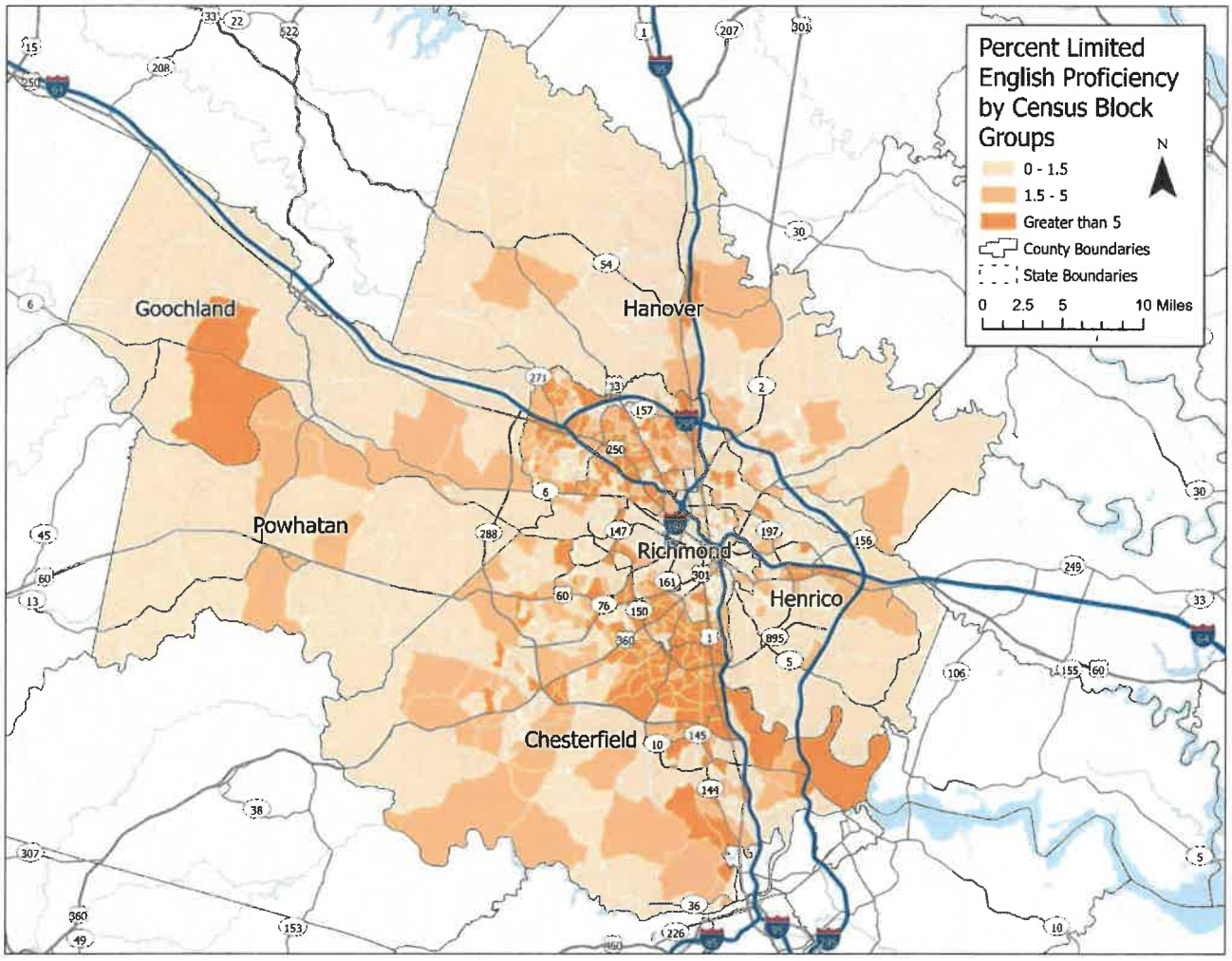
Data from the U.S. Census Bureau's American Community Survey (ACS) were obtained through www.census.gov by SOAR365's service area. The agency's service area includes a total of 44,863 (4.30%) persons with Limited English Proficiency (those persons who indicated that they spoke English less than "very well," in the 2018-2022 ACS Census).

Information from the 2018-2022 ACS also provides more detail on the specific languages 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 languages are needed to meet the needs of LEP persons.

Table 1: LEP Individuals by Language Spoken

SOAR365 Service Area			
Language	Number of LEP Population	Percent of Service Area Population Speaking Language	Percent of LEP Population Speaking Language
Spanish	23,695	2.27%	52.82%
French, Haitian, or Cajun	1,190	0.11%	2.65%
German or other West Germanic languages	369	0.04%	0.82%
Russian, Polish, or other Slavic languages	425	0.04%	0.95%
Other Indo-European languages	5,932	0.57%	13.22%
Korean	1,028	0.10%	2.29%
Chinese (incl. Mandarin, Cantonese)	3,284	0.31%	7.32%
Vietnamese	1,271	0.12%	2.83%
Tagalog	379	0.04%	0.84%
Other Asian and Pacific Island languages	2,595	0.25%	5.78%
Arabic	2,430	0.23%	5.42%
Other and unspecified languages	2,265	0.22%	5.05%
Total LEP Population	44,863	4.30%	
Total Service Area Population	1,044,383		

Figure 1: Percentage of LEP by Census Block Group



Several languages are spoken by more than 1,000 LEP persons in the service area. Spanish is the most common by a significant margin (23,695), but other Indo-European languages (5,932), Chinese (3,284), other Asian and Pacific Island Languages (2,595), Arabic (2,430), other and unspecified languages (2,265), Vietnamese (1,271), French, Haitian, and Cajun (1,190), and Korean (1,028) all surpass the 1,000-person mark. As seen in Figure 1, the LEP populations are concentrated south and northwest of Richmond.

Factor 2: Assessment of the Frequency With Which LEP Individuals Come Into Contact With Transit Services or the System

SOAR365 reviewed the relevant benefits, services, and information provided by the agency and determined the extent to which LEP persons have come into contact with these functions through one or more of the following channels:

- Calls to SOAR365

- Visits to the organization's headquarters
- Access to the organization's website

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 persons contact our agency, we attempt to identify their language and keep records on contacts to accurately assess the frequency of contact.

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

SOAR365 provides the following programs, activities, and services:

Pediatric Therapy

Providing specialized pediatric rehabilitation for children with developmental delays, disabilities, or risks

- Serves children from birth through adolescence
- Physical Therapy, Occupational Therapy, Speech/Language Pathology and Early Childhood Education
- Specialized sensory integration, pediatric feeding, and adaptive equipment
- Family support and training to increase confidence and skills
- Assessments and individual sessions in a variety of home and community settings
- Accepts most insurances and Medicaid
- Part C Early Intervention Provider

Adult Day Support

Supervising and supporting adults with developmental disabilities to achieve their highest potential

- Serves adults over the age of 18
- Three locations
- High level of staff support
- Licensed by the Virginia Department of Behavioral Health and Developmental Services (DBHDS)
- Accepts Medicaid Developmental Disability (DD) Waiver participants

Respite and Summer Camp

Offering respite and summer camp activities to youth and adults with developmental disabilities

- Year-round, weekend respite
- Summer day and overnight camp
- Located in Chesterfield County on 22 acres
- High level of staff support
- Licensed by DBHDS and accredited by the American Camp Association
- Accepts Medicaid DD Waiver participants

Employment Services

Supporting people to obtain and retain employment

- Provide individual Supported Employment services
- Provide Customized Employment and Community Supports services
- CARF Accredited
- Department of Aging and Rehabilitative Services provider
- Accepts Medicaid DD Waiver participants
- Pre Employment Transition Services works with youth to facilitate the transition from school to work

Based on experience serving and communicating with LEP persons and interviews with community agencies, as well as conversations with our clients, we learned that the following services/programs are currently of particular importance for LEP persons in the community. Our Pediatric Therapy program uses an interpreter to accompany the therapists who go into the homes of clients who speak little or no English, and this is available to clients who come to our Saunders Ave location for therapy. About 15% of children in Pediatric Therapy use an interpreter. For other services, we use a paid translator or seek out another appropriate resource.

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

Costs

The following language assistance measure currently being provided by SOAR365 is covered by SOAR365 to assist staff when they provide home visits. This cost is not currently reimbursed by state/federal funds.

We anticipate that these activities and costs will change little, based on the analysis of demographic data and contact with community, as wellas our historical analysis.

Resources

The available budget that could be currently devoted to additional language assistance expenses is variable depending on the needs of clients. We currently contract with translators as needed for clients who come to our facility for services and pay their contractual rate, usually $50/hour. This amount is likely to increase over time. There is no cost to individuals served.

Feasible and Appropriate Language Assistance Measures

These include the hiring of credentialed professional for Spanish interpretation and translation services as noted above.

LEP Implementation Plan

Through the four-factor analysis, SOAR365 has determined that it would be desirable to hire bilingual staff with competency in both spoken and written skills, particularly Spanish.

Staff Access to Language Assistance Services

Agency staff who encounter LEP persons can access language services by coordinating with contracted interpreters to assist clients. All staff are provided with a list of available language assistance services as needed and additional information and referral resources (such as community organizations which can assist LEP persons).

Responding to LEP Callers

Staff who answer calls from the public respond to LEP customers as follows: An interpreter is contacted for assistance. This occurs very rarely.

Responding to Written Communications from LEP Persons

The following procedures are followed when responding to written communications fromLEP persons - forms for our Pediatric Therapy have been translated into Spanish.

Responding to LEP Individuals in Person

The following procedures are followed when an LEP person visits our customer service and administrative office: An interpreter is contacted for assistance. This occurs very rarely.

Staff Training

As noted previously, all SOAR365 staff are able to obtain language assistance services and additional information and referral resources, updated annually.

All new hires receive training in assisting LEP persons as part of their sensitivity andcustomer service training. This includes:

- A description of the type of language assistance that the agency is currently providing and instructions on how agency staff can access these products andservices; and
- A description of the agency's cultural sensitivity policies and practices.

Also, all staff who routinely come into contact with customers, as well as their supervisors and all management staff, receive annual refresher training on policies andprocedures related to assisting LEP persons.

Providing Notice to LEP Persons

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

- following our Title VI policy statement included in our vital documents.
- on our website, with links to translations of vital documents in other languages.
- through signs posted on our vehicles and 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 onfeedback, updated demographic data, and resource availability.

As part of ongoing outreach to community organizations, SOAR365 will solicitfeedback on the effectiveness of language assistance provided and unmet needs.

In preparing the triennial update of this plan, **SOAR365** will conduct an assessment using resources such as 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) Persons: A Handbook for Public Transportation Providers."

Based on the feedback received from community members and employees, SOAR365 will make incremental changes to the type of written and oral language assistance provided as well as to their staff training and community outreach programs. The cost of proposed changes and the available resources will affect the enhancements that can be made, and therefore SOAR365 will attempt to identify themost cost-effective approaches.

As the community grows and new LEP groups emerge, SOAR365 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."

SOAR365 does not have transit-related, non-elected planning boards, advisory councils or committees, or similar committees, the membership of which we select. The transportation we provide is only for the clients in our programs to go into our community as part of the program activities.

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, and/or other factors related to transportation provided to individuals receiving services. 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).

SOAR365 is committed to ensuring that no person is excluded from participation in or deniedthe 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 4 702. I B. If you believe you are being denied participation in or being denied benefits of the transit services provided by SOAR365 or otherwise being discriminated against because of your race, color, or national origin, our contact information is:

Name: Nina Moskowitz
Title: VP Compliance
Agency Name: SOAR365
Address: 3600 Saunders Ave
City, State Zip code: Richmond, VA 23227
Telephone Number: (804) 350-6022
Email address: Nina.moskowitz@soar365.org

Appendix B

Title VI Notice to the Public List of Locations

The notice in Appendix A is posted in the interior of each DRPT funded vehicle operated in passenger (client) service as well as each of the following four office locations:

1. 3600 Saunders Ave., Richmond, VA 23227
2. 1901 Westwood Ave., Richmond, VA 23227
3. 8030 Staples Mill Rd., Henrico, VA 23228
4. 7600 Beach Rd., Chesterfield, VA 23838

Appendix C

Title VI Complaint Forms

Section I:				
Name:				
Address:				
Telephone (Home):		Telephone (Work):		
Electronic Mail Address:				
Accessible Format Requirements?	Large Print		Audio Tape	
	TDD		Other	
Section II:				
Are you filing this complaint on your own behalf?			Yes*	No
*If you answered "yes" to this question, go to Section III.				
If not, please supply the name and relationship of the person for whom you are complaining:				
Please explain why you have filed for a third party:				
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.			Yes	No
Section III:				
I believe the discrimination I experienced was based on (check all that apply): [ ] Race [ ] Color [ ] National Origin Date of Alleged Discrimination (Month, Day, Year): _____ Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form. _____ _____				
Section IV				
Have you previously filed a Title VI complaint with this agency?			Yes	No
Section V				
Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court? [ ] Yes [ ] No				

If yes, check all that apply: [ ] Federal Agency: _____ [ ] Federal Court _____ [ ] State Agency _____ [ ] State Court _____ [ ] Local Agency _____
Please provide information about a contact person at the agency/court where the complaint was filed.
Name:
Title:
Agency:
Address:
Telephone:
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

Appendix D

Investigations, Lawsuits and Complaints

List of Investigations, Lawsuits and Complaints

No investigations, lawsuits, or complaints were filed in between 1/1/2023 – 9/30/2026

	Date (Month, Day, Year)	**Summary** (include basis of complaint: race, color, or national origin)	**Status**	**Action(s) taken**
Investigations	none			
Lawsuits	none			
Complaints	none			

Appendix E

Summary of Outreach Efforts

Public outreach and involvement applies to and affects SOAR365s mission and work program, particularly agency efforts and responsibilities related to SOAR365's service planning.

Public Outreach Activities

SOAR365 is not a public transportation system, therefore does not have public outreachactivities.

Appendix F

Table Minority Representation on Committees by Race

SOAR365 does not have transit-related, non-elected planning boards, advisory councils or committees, or similar committees, the membership of which we select. The transportation we provide is only for the clients in our programs to go into our community as part of the program activities.