

Public Participation Plan

Woods Services, Inc. (“Woods”) strives to sustain the delivery of quality transportation service to the individuals it serves.

Woods’ primary service area is Langhorne, which is located in Bucks County, Pennsylvania. Most transports are between residences and educational and vocational programs, as well as to health, dental and therapeutic services and community jobs, and recreational activities.

Woods solicits and welcomes feedback from clients, caregivers, and family members/guardians of the people it serves and assesses its transportation services annually. Woods makes the necessary improvements to such services pursuant to feedback provided.

Limited English Proficiency Policy Plan

The purpose of this limited English proficiency policy guidance is to clarify the responsibilities of recipients of federal financial assistance from the U.S. Department of Transportation (DOT) and assist them in fulfilling their responsibilities to limited English proficient (LEP) persons, pursuant to Title VI of the Civil Rights Act of 1964 and implementing regulations. It was prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq., and its implementing regulations provide that no person shall be subjected to discrimination on the basis of race, color, or national origin under any program or activity that receives federal financial assistance.

Executive Order 13166

Executive Order 13166 "Improving Access to Services for Persons with Limited English Proficiency," reprinted at 65 FR 50121 (August 16, 2000), directs each Federal agency that is subject to the requirements of Title VI to publish guidance for its respective recipients clarifying that obligation. Executive Order 13166 further directs that all such guidance documents be consistent with the compliance standards and framework detailed in the Department of Justice's (DOJ's) Policy Guidance entitled "Enforcement of Title VI of the Civil Rights Act of 1964-National Origin Discrimination against Persons with Limited English Proficiency." (See 65 FR 50123, August 16, 2000 DOJ's General LEP Guidance). Different treatment based upon a person's inability to speak, read, write, or understand English may be a type of national origin discrimination. Executive Order 13166 applies to all federal agencies and all programs and operations of entities that receive funding from the federal government, including state agencies, local agencies and governments, private and non-profit entities such as Woods Services, Inc. ("Woods"), and sub recipients.

Plan Summary

Woods has developed this Limited English Proficiency Plan (LEP) to help identify reasonable steps to provide language assistance for LEP persons seeking meaningful access to Woods' services as required by Executive Order 13166. A Limited English Proficiency person is one who does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English. This plan details procedures on how to identify a person who may need language assistance, the ways in which assistance may be provided, training staff, how to notify LEP persons that assistance is available, and information for future plan updates. In developing the plan while determining Woods' extent of obligation to provide LEP services, Woods conducted a U.S. Department of Transportation four factor LEP analysis which considers the following: 1) The number or proportion of LEP persons eligible in the Woods transportation service area who may be served or likely to encounter a Woods transportation program, activity, or service; 2) the frequency with which LEP individuals come in contact with Woods transportation services; 3) the nature and importance of the program, activity or service provided by Woods to the LEP population; and 4) the resources available to Woods and overall costs to provide LEP assistance. A brief description of these considerations is provided in the following section.

Four Factor Analyses

1. The number or proportion of LEP persons eligible in the Woods transportation service area who may be served or likely to encounter a Woods transportation program, activity, or service.

Woods examined the US Census report from 2011-2015, and using data from Census tracts in Woods' service area of Langhorne located within Bucks County, Pennsylvania, determined that approximately 88.8% of people within Woods' service area age 5 and older spoke English as the primary or only language. Approximately 11.2% speak a language other than English. Woods primarily provides transportation to 600 individuals that it serves and has determined that approximately 8% of them speak a language other than English as their primary language.

2. The frequency with which LEP individuals come in contact with a Woods transportation program, activity, or service.

Woods assessed the frequency at which staff and drivers have or could possibly have contact with LEP persons. Woods provides daily transportation to 600 individuals and approximately 8% of them speak a language other than English as their primary language.

3. The nature and importance of the program, activity, or service provided by Woods to LEP community.

There is no large geographic concentration of any one type of LEP individuals in the Woods service area. The majority of the population, 88.8% of residents speaks English as their primary language. Moreover, Woods' serves approximately 600 individuals in Langhorne located within Bucks County, Pennsylvania. Most transports are between their residences and their educational and vocational programs and community jobs, as well as health, dental and therapeutic services and recreational activities.

For the most part, LEP individuals do not use Woods transportation services.

4. The resources available to Woods and overall costs

Woods assessed its available resources that could be used for providing LEP assistance. This included identifying costs associated with subscription to the Language Line service, the costs of additional translation services such as a professional interpreter on an as needed basis, which documents would be the most valuable to be translated if and when the population requires, taking an inventory of available organizations that Woods could partner with for translation efforts, and what level of staff training is needed. After analyzing the four factors, Woods developed the plan outlined in the following section for assisting persons of limited English proficiency at a low cost.

Limited English Proficiency Plan Outline

Language Assistance Measures

Should Woods encounter clients with LEP, Woods has or will implement the following LEP procedures. The creation of these steps are based on the very low percentage of persons speaking other languages or not speaking English at least "well," and the lack of resources available in the Woods service area:

- When an interpreter is needed, in person or on the telephone, staff fluent in the required language is utilized and if no one is available then Woods will utilize the Language Line Service.

Woods Staff Training

All Woods staff will be made available a copy of the LEP Plan and will be educated on procedures to follow. This information will also be part of the Woods staff orientation process for new hires. Training topics are listed below:

- Understanding the Title VI policy and LEP responsibilities;
- Documentation of language assistance requests;
- How to handle a Title VI and/or LEP complaint

Outreach Techniques

Woods does not have a formal practice of outreach techniques due to the lack of LEP population and resources available in the service area. However, the following are a few options that Woods will incorporate when and/or if the need arises for LEP outreach:

- If staff knows that they will be presenting a topic that could be of potential importance to an LEP person or if staff will be hosting a public meeting in a geographic location with a known concentration of LEP persons, meeting notices, fliers, advertisements, and agendas will be printed in an alternative language, based on known LEP population in the area.
- Key print materials will be translated and made available at the Woods Langhorne campus facilities when a specific and concentrated LEP population is identified

Monitoring and Updating the LEP Plan

This plan is designed to be flexible and is one that can be easily updated. At a minimum, Woods will follow the Title VI Program update schedule for the LEP Plan.

Each update should examine all plan components such as:

- How many LEP persons were encountered?

- Were their needs met?
- What is the current LEP population in Woods service area?
- Has there been a change in the need for language assistance for Woods programs?
- Have Woods' available resources, such as technology, staff, and financial costs changed?
- Has Woods fulfilled the goals of the LEP Plan?
- Were any complaints received?

Dissemination of the Woods Limited English Proficiency Plan

Woods includes the LEP plan on the Woods website (www.woods.org) together with its Title VI Policy and Complaint Procedures. Woods' Notice of Rights under Title VI to the public is available in the Woods Administration building lobby area.

Any person, including social service, non-profit, and law enforcement agencies, along with other community partners with Internet access will be able to access the plan.

Copies of the LEP Plan will be provided upon request. LEP persons may obtain copies/translations of the plan upon request.

Any questions or comments regarding this plan should be directed to the Woods Services, Inc. Vice President of Human Resources.

Human Resources, Vice President of Human Resources
 Woods Services, Inc.
 40 Martin Gross Drive
 Langhorne, PA 19047
 Phone :215-750-4000
 Fax :215-750-4229
 Email : jpfister@woods.org

Non-elected committees and councils

Woods Services, Inc. has a self-perpetuating Board of Trustees ("Board") and the Board appoints its own Committees and sub-committees.

Equity Analysis Statement:

Woods has not performed a major construction project since the last Title VI update so no equity analysis has been performed. Woods will perform an equity analysis for all future qualifying construction projects.

Woods Services, Inc. - Title VI Equity Analysis Procedures for Compliancy with FTA C 4702. 1B.

WOODS' TITLE VI - DETERMINATION OF SITE OR LOCATION OF FACILITIES

Title 49 CFR Section 21.9(b)(3) states, "In determining the site or location of facilities, a recipient or applicant may not make selections with the purpose or effect of excluding persons from, denying them the benefits of, or subjecting them to discrimination under any program to which this regulation applies, on the grounds of race, color, or national origin; or with the purpose or effect of defeating or substantially impairing the accomplishment of the objectives of the Act or this part."

Title 49 CFR part 21, Appendix C, Section (3)(iv) provides, "The location of projects requiring land acquisition and the displacement of persons from their residences and businesses may not be determined on the basis of race, color, or national origin." For purposes of this requirement, "facilities" does not include bus shelters, as these are transit amenities and are covered in Chapter IV, nor does it include transit stations, power substations, etc., as those are evaluated during project development and the NEPA process. Facilities included in this provision include, but are not limited to, storage facilities, maintenance facilities, operations centers, etc.

In order to comply with the regulations:

- a. Woods shall complete a Title VI equity analysis during the planning stage with regard to where a project is located or sited to ensure the location is selected without regard to race, color, or national origin. Woods will engage in outreach to persons potentially impacted by the sites of facilities. The Title VI equity analysis will compare the equity impacts of various site alternatives, and the analysis will occur before the selection of the preferred site.
- b. When evaluating locations of facilities, Woods will give attention to other facilities with similar impacts in the area to determine if any cumulative adverse impacts might result. Analysis will be done at the Census tract or block group where appropriate to ensure that proper perspective is given to localized impacts.
- c. If Woods determines that the location of a project will result in a disparate impact on the basis of race, color, or national origin, Woods will only locate the project in that location if there is a substantial legitimate justification for locating the project there, and where there are no alternative locations that would have a less disparate impact on the basis of race, color, or national origin. Woods will show how both tests are met. Woods realizes that in order to make this showing, Woods must consider and analyze alternatives to determine whether those alternatives would have less (Chap. III-12 FTA C 4702.1B) of a disparate impact on the basis of race, color, or national origin, and then implement the least discriminatory alternative.

Definitions – According to the Federal Transit Administration

Minority: The FTA defines a minority person as one who self-identifies as American Indian/Alaska Native, Asian, Black or African American, Hispanic or Latino, and/or Native Hawaiian/Pacific Islander.

Low Income: The FTA defines a low-income individual as one whose household income is at or below the poverty guidelines set by the Department of Health and Human Services (DHHS). DHHS poverty thresholds are based on household size and income, and are nearly identical to the guidelines used to define poverty in the 2011 U.S. Census and American Community Survey (ACS), which form the basis of this review.

Disparate Impact: The defines “disparate impacts” as neutral policies or practices that have the effect of disproportionately excluding or adversely affecting members of a group protected under Title VI, and the recipient’s policy or practice lacks a substantial legitimate justification. If the results of the analysis indicate a potential for disparate impacts, further investigation is performed. This investigation uses qualitative assessments and/or the “four-fifths rule” to determine whether disparate impacts exist. In this analysis, if the quantitative results indicate that the Concept Plan service changes provide benefits to minority/low-income groups at a rate less than 80 percent of the benefits provided to non-minority/non-low-income groups, there could be evidence of disparate impacts and mitigation measures should be identified.

List of Title VI Investigations/Complaints/Lawsuits

See Exhibit A

Reviewed and approved: July 24, 2017



Tine Hansen-Turton
Chief Executive Officer