

**Woods Services, Inc.**

***Title VI Plan***

Board Approved:

**October 31, 2024**

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## Policy Statement

Woods Services, Inc., as a recipient of Federal Transit Administration (FTA) grant dollars either directly from FTA or through the Pennsylvania Department of Transportation (PennDOT), will comply with the Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the U.S. Department of Transportation implementing regulations.

## Title VI Plan Elements

Woods Services, Inc.'s Title VI plan includes the following elements:

1. Evidence of Policy Approval by Board of Directors
2. Notice to the Public
3. Complaint Procedure
4. Complaint Form
5. List of transit related Title VI Investigations, Complaints and Lawsuits
6. Public Participation Plan
7. Language Assistance Plan

*Note: Additional materials will be attached, if required.*

Woods Services, Inc. will review its policy every three years to determine if modifications are necessary.

## Policy Updates – Activity Log

Date	Activity (Review/Update/Addendum/ Adoption/Distribution)	Person Responsible	Remarks
7/2017	Original policy reviewed by in-house legal counsel and approved by Woods Services board of directors for adoption	Dalene Neopolitan/Sarah Rosenberg	
9/18/2024	Updated and reviewed by legal counsel	Dalene Neopolitan/Breanne DeRaps	

## Title VI Notice to the Public

Woods Services, Inc.'s Notice to the Public is as follows:

1. Woods Services, Inc. ("Woods") operates its program and services without regard to race, color and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with Woods Services, Inc. within 180 days following the date of the alleged incident.
2. For more information about Woods' Title VI Program, obligations, procedures and/or to file a complaint, please:
  - a. Call (215) 750-4000 and ask for Human Resources, Vice President
  - b. Mail the completed complaint form to:
    - i. Woods Services, Inc.  
Human Resources, Sr. Vice President  
40 Martin Gross Drive  
Langhorne, PA 19047 OR
  - c. Visit our Administrative Office at:
    - i. Woods Services, Inc.  
Human Resources, Sr. Vice President  
40 Martin Gross Drive  
Langhorne, PA 19047
3. Public notice of Title VI Policy and Complaint Procedures is posted in each vehicle and at Woods' Administrative Offices, 40 Martin Gross Drive, Langhorne, PA 19047. Complaint procedures and forms are also available on Woods' website at: <https://www.woods.org/woods-services/>.
4. A complainant may file a complaint directly with the Federal Transit Administration or U.S. Department of Transportation. The addresses are:
  - a. Federal Transit Administration - Office of Civil Rights  
Attention: Title VI Program Coordinator  
East Building, 5<sup>th</sup> Floor-TCR  
1200 New Jersey Avenue, SE  
Washington, DC 20590
  - b. U. S Department of Transportation  
Federal Transit Administration's Office of Civil Rights  
1760 Market Street  
Suite 500  
Philadelphia, PA 19103-4124
5. If information is needed in another language, contact (215) 750-4000.
6. Si se necesita informacion en otro idioma, por favor llame al (215) 750-4000.

## **ADA and Title VI Complaint Procedure**

### **Title VI Policy and Complaint Process**

Woods Services, Inc. ("Woods") grants equal access to its programs and services to all citizens. This document serves to make citizens aware of their rights to such access, and serves to educate citizens so that they may understand the civil rights laws that protect their receipt and benefit of such services as defined by Title VI of the Civil Rights Act of 1964.

**WHAT IS TITLE VI?** Title VI is a section of the Civil Rights Act of 1964 requiring 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 subjected to discrimination under any program or activity receiving federal financial assistance." Note that Title VI does not address gender discrimination. It only covers race, color and national origin. Other Civil Rights laws prohibit gender or age discrimination.

### **WOODS' TITLE VI COMPLAINT AND INVESTIGATION PROCEDURES**

These procedures cover all complaints filed under Title VI of the Civil Rights Act of 1964 for alleged discrimination in any program or activity administered by Woods Services, Inc. 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. 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 Woods may be utilized for resolution. Any individual, group of individuals or entity that believes they have been subjected to discrimination prohibited under Title VI and related statutes may file separate complaints.

1. A formal complaint must be filed within 180 days of the alleged occurrence. Complaints shall be in writing and signed by the individual or his/her representative, and will include the complainant's name, address and telephone number; name of alleged discriminating official, basis of complaint (race, color, national origin), and the date of alleged act(s). A statement detailing the facts and circumstances of the alleged discrimination must accompany all complaints. A Woods Title VI complaint form can be obtained from the Woods office. Woods encourages individuals to submit Title VI complaints in writing using this form and mailing it to:

**Human Resources, Sr. Vice President  
Woods Services, Inc.  
40 Martin Gross Drive  
Langhorne, PA 19047**

2. In the case where a complainant is unable or incapable of providing a written statement, a verbal complaint of discrimination may be made to Woods Human Resources Compliance Officer. Under these circumstances, the complainant will be interviewed, and the Woods Sr. Vice President of Human Resources will assist the complainant in completing a written statement.
3. When a complaint is received, the Sr. Vice President of Human Resources will provide written acknowledgment to the Complainant, within ten (10) business days by registered mail or hand delivery.

4. If a complaint is deemed incomplete, additional information will be requested, and the Complainant will be provided 60 business days to submit the required information. Failure to do so may be considered good cause for a determination of no investigative merit.
5. Within 15 business days from receipt of a complete complaint, Woods will determine its jurisdiction in pursuing the matter and whether the complaint has sufficient merit to warrant investigation. Within five (5) days of this decision, the Chief Executive Officer or his/her authorized designee will notify the Complainant and Respondent, by registered mail or hand delivery informing them of the disposition.
  - a. If the decision is not to investigate the complaint, the notification shall specifically state the reason for the decision.
  - b. If the complaint is to be investigated, the notification shall state the grounds of Woods' jurisdiction, while informing the parties that their full cooperation will be required in gathering additional information and assisting the investigator.
6. When Woods does not have sufficient jurisdiction, the Chief Executive Officer or his/her authorized designee will refer the complaint to the appropriate State or Federal agency holding such jurisdiction.
7. If the complaint has investigative merit, the Chief Executive Officer or his/her authorized designee will instruct the Compliance Officer to fully investigate the complaint. A complete investigation will be conducted, and an investigative report will be submitted to the Chief Executive Officer within 60 days from receipt of the complaint. The report will include a description of the incident, summaries of all persons interviewed, and a finding with recommendations and proposed resolution where appropriate. If the investigation is delayed for any reason, the Vice President of Human Resource will notify the appropriate authorities, and an extension will be requested.
8. The Chief Executive Officer or his/her authorized designee will issue letters of finding to the complainant and Respondent within 90 days from receipt of the complaint.
9. If the Complainant is dissatisfied with Woods' resolution of the complaint, he/she has the right to file a complaint in the time allotted by law with:

**Federal Transit Administration Region 3**  
**1760 Market Street Suite 500**  
**Philadelphia, PA 19103-4124**  
**(215) 656-7100 (telephone)**  
**(215) 656-7260 (fax)**

#### **POSTING OF PUBLIC NOTICE**

Public notice of Title VI Policy and Complaint Procedures is posted in each vehicle and at Woods Services, Inc. Administrative Offices, 40 Martin Gross Drive, Langhorne, PA 19047.

## ADA and Title VI Complaint Form

The Americans with Disabilities Act (ADA) prohibits discrimination on the basis of disability in employment, State and local government, public accommodations, commercial facilities, transportation, and telecommunications. To be protected by the ADA, one must have a disability or have a relationship or association with an individual with a disability. Title VI of the 1964 Civil Rights Act requires 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." If you feel you have been discriminated against in transit services, please provide the following information in order to assist us in processing your complaint:

Please print CLEARLY:

<b><u>Section I:</u></b>			
Name:			
Address:			
City, State, Zip Code:			
Telephone Number: (home)		(cell)	
Accessible Format Requirements?	Large Print	TDD	Audio Tape

<b><u>Section II:</u></b>	
Are you filing this complaint on your own behalf?	YES*      NO
If you answered YES to this question-go to <b>Section III</b>	
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 you have obtained the permission of the aggrieved party if you are filing on behalf of a third party: <input type="checkbox"/> Yes <input type="checkbox"/> No	

<b><u>Section III:</u></b>
I believe the discrimination I experienced was based on (check all that apply):
<input type="checkbox"/> disability <input type="checkbox"/> race** <input type="checkbox"/> color** <input type="checkbox"/> 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 an ADA or Title VI complaint with this agency?  Yes  No

**Section V:**

Have you filed an ADA or Title VI 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 Court: \_\_\_\_\_

State Agency: \_\_\_\_\_

Local Agency: \_\_\_\_\_

Please provide information about a contact person at the agency/court where the complaint was filed.

Name: \_\_\_\_\_

Title: \_\_\_\_\_

Agency: \_\_\_\_\_

Address: \_\_\_\_\_

Phone: \_\_\_\_\_

**Section VI:**

Name of agency compliant is against:

Contact person:

Title:

Phone:

\*\*Indicates is specific to Title VI of the Civil Rights Act of 1964

You may attach any written materials or other information that you think is relevant to your complaint.

Signature and date required below:

\_\_\_\_\_  
Your Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Print your name

Please submit this form in person at the address below, or mail this form to:

**Human Resources, Compliance Officer  
Woods Services, Inc.  
40 Martin Gross Drive  
Langhorne, PA 19047**

Woods Services, Inc.'s ADA and Title VI Complaint Procedure is made available in the Human Resources lobby in Woods' main administrative building, and in all vehicles used to transport clients. Complaint procedures and forms are also available on Woods' website at:  
<https://www.woods.org/woods-services/>.



### List of Transit Related Title VI Investigations, Complaints and Lawsuits

Woods maintains a list or log of all Title VI investigations, complaints and lawsuits, pertaining to its transit-related activities.

**Check One:**

There have been no investigations, complaint and/or lawsuits filed against us during list the years since last update (eg. 2015-2024).

\_\_\_\_\_

There have been investigations, complaints and/or lawsuits filed against us. *See list below. Attach additional information as needed.*

\_\_\_\_\_

	Date (Month, Day, Year)	Summary (include basis of complaint: race, color, or national origin)	Status	Action(s) Taken
<b>Investigations</b>				
1.				
2.				
<b>Lawsuits</b>				
1.				
2.				
<b>Complaints</b>				
1.				
2.				

## **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 Analysis**

### **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 2020, and using data from Census tracts in Woods' service area of Langhorne located within Bucks County, Pennsylvania, determined that approximately 86.8% of people within Woods' service area age 5 and older spoke English as the primary or only language. Approximately 13.2% speak a language other than English. Woods primarily provides transportation to more than 445 individuals that it serves and has determined that approximately 1% 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 more than 445 individuals and approximately 1% 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, 86.8% of residents speaks English as their primary language. Moreover, Woods' serves more than 445 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](http://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 (Human Resources).

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:

**Human Resources, Sr. Vice President  
Woods Services, Inc.  
40 Martin Gross Drive  
Langhorne, PA 19047**

**Table Depicting Minority Representation on Governing Body**

	American Indian or Alaska Native	Asian	Black or African American	Hispanic or Latino	Native Hawaiian or Pacific Islander	White
Service Area Pop.	0%	5%	4%	6%	0%	80%
Board of Directors	0%	0%	16%	0%	0%	84%

The Board of Directors of Woods Services, Inc. has adopted a specific DEI statement and/or policy for the organization. Additionally, Woods' Principles of Cultural Responsiveness are included in its Performance & Quality Improvement manual, which is shared and signed by every Woods employee.

**Non-elected committees and councils**

Woods 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**

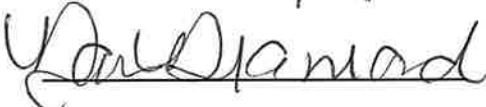
Minority: The FTA defines a minority person as one who self-identifies as American Indian/Alaska Native, Asian, Black or African American, Hispanic or Latino, and/or Native Hawaiian/Pacific Islander.

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.

Reviewed and approved:

Date: 10/31/2024



Dawn Diamond, MS  
Chief Executive Officer

**Attachment A. Documentation of Approval by Governing Body**

Agency attach documentation of Approval by Governing Body here.