



Success Through Engagement & Partnership

STEP TRANSPORTATION
TITLE VI PLAN

October, 2024

Title VI Background

STEP Transportation grants equal access to its programs and services to all citizens. This document serves to make customers and potential customers 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.

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 discrimination.

STEP TRANSPORTATION TITLE VI COMPLAINT/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 STEP Transportation. 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 STEP 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.

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by Lycoming-Clinton Counties Commission for Community Action (STEP), Inc. Transportation (hereinafter referred to as "STEP Transportation") may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form (See Appendix A). STEP Transportation investigates complaints received no more than 180 days after the alleged incident. STEP Transportation will process complaints that are complete.

Once the complaint is received, STEP Transportation will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office.

STEP Transportation has 60 days to investigate the complaint. If more information is needed to resolve the case, STEP Transportation may contact the complainant. The complainant has 15 business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within 15 business days, STEP Transportation can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

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

**Federal Transit Administration Office of Civil Rights
Attn: Title VI Coordinator
East Building 5th Floor-TCR
1200 New Jersey Avenue SE
Washington, DC 20590
(888) 446-4511 (Phone)**

POSTING OF PUBLIC NOTICE

Public notice of Title VI Policy and Complaint Procedures is posted in each vehicle and at the STEP Administrative Offices, 2138 Lincoln Street, Williamsport, PA 17701.

LIMITED ENGLISH PROFICIENCY PLAN

Background

Pursuant to Federal Transit Administration (FTA) Circular C 4702.1A (May 13, 2007), which provides recipients and sub-recipients of FTA financial assistance with guidance and instructions necessary to carry out the U.S. Department of Transportation's (DOT's) Title VI regulations (49 CFR part 21) and to integrate into their programs and activities considerations expressed in the DOT's *Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons* (70 FR 74087, December 14, 2005), STEP Transportation has developed the following implementation plan.

Meaningful Access to LEP Persons

Title VI and its implementing regulations require that FTA recipients take responsible steps to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are Limited English Proficient (LEP). Recipients and sub-recipients can ensure that LEP persons have meaningful access to their programs and activities by developing and carrying out a language implementation plan pursuant to the recommendations in Section VII of the DOT LEP Guidance.

INTRODUCTION

Limited English Proficiency (LEP) is defined by the US Department of Transportation (DOT) as "individuals who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English." STEP Transportation has developed this LEP Plan to ensure LEP persons have meaningful access to STEP Transportation's programs, services, and activities.

STEP Transportation's LEP Plan was developed utilizing the Federal Transit Administration Office of Civil Rights, April 13, 2007, handbook for Public Transportation Providers entitled "Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons."

STEP Transportation is committed to ensuring that no person is excluded from participation in or denied the benefit of its services on the basis of race, color, or national origin. This plan was prepared in accordance with Title VI of the Civil Rights Act of 1964: *National Origin Discrimination Against Persons with Limited English Proficiency* and Executive Order 13166: *Improving Access to Service for Persons with Limited English Proficiency (LEP)*.

SERVICE OVERVIEW

STEP provides shared-ride service to all residents of Lycoming and Clinton counties. In addition to Lycoming and Clinton counties, STEP provides transportation to facilities in Columbia, Montour, Northumberland, Union, Snyder, and Centre counties. The service area of coverage, in square miles, is three times the size of the state of Rhode Island, and 23% greater than the size of Rhode Island and Delaware combined.

PLAN SUMMARY

STEP Transportation has developed this Limited English Proficiency Plan to help identify steps for providing language assistance to persons with limited English proficiency (LEP) who wish to access services provided by STEP Transportation.

This plan outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, staff training, how to notify LEP persons that assistance is available, and information for future plan updates.

Additionally, STEP Transportation has taken steps to further develop the plan in order to:

- Provide enhanced training to staff members.
- Enhance accessibility of information to potential LEP individuals.
- Increase dialogue between local Human Service organizations.

STEP Transportation uses the recommendations set forth in the DOT's LEP guidance handbook which explains the four-factor framework for determining an appropriate mix of language assistance and how to prepare a language assistance implementation plan that is consistent with the DOT LEP Guidance. STEP Transportation understands that the information in this handbook is advisory and does not establish new requirements for FTA recipients or sub recipients.

STEP Transportation's review and implementation of the four-factor analysis includes:

- **Factor 1:** The number and proportion of LEP persons eligible in STEP Transportation's service area who may be served or who are likely to encounter STEP Transportation programs, activities, and services.
- **Factor 2:** The frequency with which LEP persons come into contact with STEP Transportation's programs, activities, or services.
- **Factor 3:** The nature and importance of programs, activities, or services provided by STEP Transportation to the LEP population.
- **Factor 4:** The resources available and overall cost to provide LEP assistance.

SUMMARY OF FOUR-FACTOR ANALYSIS

Factor 1: The number and proportion of LEP persons eligible in STEP Transportation’s service area who may be served or who are likely to encounter our programs, activities, and services.

For the LEP plan update, STEP Transportation reviewed demographic data for the State of Pennsylvania, Lycoming County, and Clinton County (which are the counties within STEP’s population service area).

STEP Transportation analyzed census data from the “2022 American Community Survey 5-Year Estimates” Language Spoken at Home by Ability to Speak English for the Population 5 years and over. For the Program Year July 1, 2023-June 30, 2024, this population universe represented less than 1% of STEP Transportation trips. While the percentage of LEP individuals is low in comparison to the total population, STEP Transportation will continue to review demographic data annually for any significant population changes that would merit changes to plan direction.

Based on the data analysis of all recorded languages, 1,735 individuals (1.2% or less) in STEP Transportation’s service area population speak English “Less than very well,” falling well below the state average for all languages as illustrated by the following table:

	Total Population	Speaks English “Less than Very Well”	Percent
State of Pennsylvania	12,303,274	614,290	5.00%
Lycoming County	108,006	1,243	1.15%
Clinton County	35,812	492	1.37%

Determining the concentration of a specific language other than English was derived by using data from the same table. The following was derived by using data from S1601 shows English versus non-English along with the four highlighted language categories other than English in STEP Transportation’s population service area.

This breakdown will allow us to target specific languages when determining the frequency with which LEP persons interact with STEP Transportation’s programs, activities, and/or services.

Table 2. Ability to Speak English by Language Spoken at Home for the Population 5 Years & Universe: Population 5 Years & Over

Geographic Area: Lycoming & Clinton Counties

Language Spoken at Home	Speaks English "Very Well"		Speaks English "Not Very Well"		TOTAL	
	Number	Percent	Number	Percent	Number	Percent
Total Population	142,083	99%	1,735	1%	143,818	100.0
Speaks language other than English	4,952	74%	1,735	26%	6,687	5.0%
Spanish	1,032	65%	553	35%	1,585	1.0%
Other Indo-European languages	3,285	78%	908	22%	4,193	3.0%
Asian & Pacific Island languages	496	65%	268	35%	764	0.5%
Other languages	139	96%	6	4%	145	0.1%

The following table illustrates a concentration of the top eight specific languages other than English within our population coverage area. The table was derived by using data from S1601, American Community Survey 2022 5-Year estimates, Languages Spoken at Home by the Ability to Speak English for the Population 5 Years and Older, and Table S0101. Using the Census data for Lycoming & Clinton Counties and the main population cities of Williamsport & Lock Haven. This analysis will allow us to target specific languages when determining the frequency with which LEP persons interact with STEP Transportation's programs, activities, and/or services.

Geographic Area	Total Population 5 Yrs. of Age and Older	% of Total Pop. 5 Yrs of Age and Older	Spanish	Other Indo-European Languages	Asian & Pacific Island Languages	Other Languages
Combined Counties	143,818	95%	1,585	4,193	764	145
Lycoming County	108,006	95%	1,318	2,151	581	120
Clinton County	35,812	96%	267	2,042	183	25
City of Williamsport	26,062	94%	459	481	157	72
City of Lock Haven	7,989	99%	95	102	64	6

Factor 2: The frequency with which LEP persons come into contact with STEP Transportation’s programs, activities, or services.

In July 2024, STEP Transportation reviewed a report from its interpreting services Language Service Associates for the time period 7/1/21-6/30/24 to assess the frequency with which LEP persons interact with our programs, activities, or services. The following chart summarizes the LEP Exposure Compilation results:

Exposure				Outcome			
	Rarely	Occasionally	Frequently		Don't Know	Successful	Unsuccessful
Spanish	16	0	0	Spanish	0	16	0
Haitian Creole	21	0	0	Haitian Creole	0	21	0
Italian	0	0	0	Italian	0	0	0
German	0	0	0	German	0	0	0
Russian	0	0	0	Russian	0	0	0
Polish	0	0	0	Polish	0	0	0
Urdu	0	0	0	Urdu	0	0	0
Chinese	0	0	0	Chinese	0	0	0
Unknown	0	0	0	Unknown	0	0	0
Total	37	0	0	Total	0	37	0
%	100.00%	0.00%	0.00%	%	0.00%	100.00%	0.00%

The table illustrates the number of encounters, not the number of customers all levels of staff have experienced from 7/1/21-6/30/24. Approximately 10% of staff has experienced an encounter with an identified LEP individual while providing service. This highlights the importance of the LEP plan, the plan’s continued development, and staff training initiatives. Furthermore, 100% of encounters were deemed to be successful utilizing established procedures.

Based on this staff survey, the Transportation Department will continue utilizing Language Identification Materials to further ascertain and track the specific encounters and language(s) of the LEP population. This process will enable STEP Transportation to review and continue to develop programs to address the needs of the LEP population.

Factor 3: The nature and importance of programs, activities, or services provided by STEP Transportation to the LEP population.

The transportation services provided by STEP are high-need services that provide access for passengers to work, medical appointments, and shopping opportunities. Based on 2023-24 Ecolane Operating System Data, STEP Transportation Trip Purposes/Services were as follows:

STEP Transportation Trips-July 1, 2023-June 30, 2024		
Trip Purpose	# of Trips	% of Trips
Education	1,020	0.2%
Shopping	3,157	2.6%
Work	12,293	13.0%
Medical	58,080	81.3%
Recreation	3,342	2.0%
Social Services/Visiting	622	0.1%
Senior Centers	3,847	0.6%
TOTAL TRIPS	82,361	100%

Access to our services is critical to the LEP individual due to the locations and destinations that the system provides access to (i.e., employment centers, grocery stores, medical facilities, shopping, and social and recreational facilities). We will continue to examine schedules, fare and payment information, system rules, ride guides, and consumer complaint forms with the intent on developing/revising instruments that could be used to increase the LEP individual's access to our services.

STEP's Transportation Program utilizes Language Services Associates (LSA), (455 Business Center Drive-Suite 100, Horsham, PA 19044) for its Interpretive Services and Document Translation. This agreement allows us to provide interpretation services to assist LEP individuals obtain vital information about our system, which increases the independence of the individual and their trust within our service.

Additionally, Language Interpreter Identification Cards ("I speak" cards) are stored in each revenue vehicle and are utilized to provide information to the LEP individual and a guide of how to process the encounter for the Vehicle Operator. Efforts are made to coordinate and channel LEP individuals in need of translation services to Language Services Associates. In addition, language interpretive services posters/signs are posted on STEP vehicles and placed on our website directing LEP individuals to call our office if language services are needed.

Factor 4: The resources available and overall cost to provide LEP assistance.

STEP Transportation is committed to ensuring LEP persons have meaningful access to our programs, services, and activities, and will devote the necessary resources to accomplish service goals. Our department will continue to monitor LEP populations and will provide language services on an as need basis.

Based on current data, Transportation will continue to focus on LEP persons whose primary language is Spanish; however, resources will be utilized for all eight languages referenced above.

As previously stated, STEP Transportation will continue to utilize LSA to provide professional interpreter/translation services. Further development of the LEP plan provides a mechanism for the Transportation Program to monitor LEP persons in its service area, define LEP needs, and implement LEP assistance.

NON-ELECTED COMMITTEES AND COUNCILS

STEP is a non-profit Community Action Agency which is governed by a Board of Directors which is comprised of 15 members. The representation is 1/3 Public Sector, 1/3 Private Sector, and 1/3 Low Income population representation. STEP Transportation does not appoint Board of Director members nor any other committee or subcommittee members.

TITLE VI FACILITY EQUITY ANALYSIS

STEP will be locating a transportation vehicle storage facility adjacent to the Fairfield Ford Facility in Williamsport. The facility will house STEP vehicles as well as provide minimal space for training activities. In determining the site for the facility, STEP reviewed to what if any extent the selected site would have on consumers or potential consumers. After reviewing options, it was determined that the chosen site would not result in a disparate impact on the basis of race, color, or national origin. A primary driver of this analysis is the fact that this facility will be used for vehicle storage and program operations directly accessed by consumers will not occur at this site. In addition, the facility will be in a location convenient to the provider of vehicle maintenance for STEP Transportation.

STEP TRANSPORTATION PUBLIC PARTICIPATION PLAN

STEP Transportation has thoroughly reviewed the established LEP Plan and is preparing to further develop the plan to provide more education to staff, human service organizations, and businesses that may service a high population of LEP individuals.

To ensure proper and effective communication, STEP Transportation has reviewed all documentation, procedures, and processes concerning the LEP Plan. Therefore, after careful review, STEP Transportation has committed to the following initiatives to further develop the LEP Plan and assist individuals in accessing and effectively utilizing our services.

1. Plan Notification Methods

- a. Revise Title VI Notification, Complaint Procedures, and Complaint Form to account for staff changes.

- b. Developed a dedicated link on company website for Title VI information, enabling easier access to vital information.
- c. Distributing Title VI information and LEP Plan to local Human Service organizations to assist in providing notifications directly to population in need (see section entitled Dissemination of STEP TRANSPORTATION's LEP Plan).
- d. Post information at STEP Transportation office locations.
- e. Utilize Notification posters in the interior of transit vehicles.
- f. Revised "I Speak" cards have been distributed to all transit vehicles - include the seven (7) most spoken foreign languages (as determined through census data) and contact information for STEP TRANSPORTATION Customer Service. LEP individual will be asked to identify preferred language and then to contact STEP TRANSPORTATION customer Service for further assistance.
- g. Revised "I Speak" cards for Dispatch- revised cards detail LEP procedures; as well as contain contact information and process for contacting Language Service Associates.

2. Language Assistance Measures

- a. Develop schedule of Information Sessions that target Human Service organizations to provide information about our system and services, including the LEP Plan. STEP will coordinate with Human Service organizations to obtain information regarding contact with LEP individuals to tailor service strategies. Language assistance tools will be provided to Human Service organizations for more direct distribution to LEP individuals as appropriate; Information Session to be scheduled twice per year.
- b. Obtain translation of vital documents for distribution as needed that include:
 - Title VI Notification
 - Complaint Procedures
 - Complaint Form
 - Description of Services
- c. Utilize local businesses to distribute LEP materials and information regarding STEP Transportation services in preferred languages.
 - Human Service Organizations
 - James V. Brown and the Ross Public Library
 - Lycoming & Clinton County Offices of the PA Department of Human Service Transit Centers
- d. Work with the Lycoming & Clinton County Metropolitan Planning Organization for public outreach on all transit initiatives.
- e. Survey operators, dispatchers, maintenance, administrators, and customer service staff annually on their experience and contact with LEP persons during the previous year.
- f. Review service materials for increasing symbolic signs.

3. Staff Training

- a. Revised LEP procedures, process, roles, and responsibilities (see Appendix E).
- b. Enhanced training- STEP Transportation staff will conduct LEP training for front line employees (see Appendix F). The training consisted of a review of revised process and procedures, a video entitled: During the training, employees will discuss an LEP encounter and the importance of following each step of the process. It is believed that staff will benefit by reviewing the entire process from beginning to end so they can understand their role is in identifying and then referring the encounter to the proper staff.

- c. Incorporate new training materials referenced above into new employee orientation plan.
4. Monitoring and Updating the LEP Plan
- a. Development of a LEP encounter tracking tool to document LEP encounters and provide analytical information that can be used to better service LEP individuals. This document will be reviewed on a quarterly basis.
 - b. Revised LEP procedures, process, roles, and responsibilities based on LEP encounter survey data.
 - c. Implement Information Sessions to target local Human Service organizations to more effectively provide information regarding our system, services, and programs to LEP individuals.
 - Developed outline for Information Sessions (see section entitled Dissemination of STEP Transportation's LEP Plan)
 - d. Annually review & update demographics.
 - Change and/or concentration in LEP population
 - e. Annually review & update plan.
 - Evaluate plan- based upon LEP encounters survey
 - Determine if needs of LEP have been addressed
 - Determine if needs of LEP services have changed
 - Determine financial resources
 - Determine whether complaints have been received relative to the needs of LEP individuals
5. Monitor changes and update the LEP plan where appropriate.

DISSEMINATION OF STEP TRANSPORTATION'S TITLE VI/LEP PLAN

STEP Transportation's LEP Plan, Title VI Policy, and complaint form will be included on the STEP Transportation website at stepcorp.org.

Additionally, this LEP Plan will also be shared with human service organizations in its service area. These organizations, listed below, will be targeted for Information Sessions, which are designed to provide information about STEP Transportation's system, services, and programs to more effectively and efficiently distribute vital information to end users and LEP individuals.

- Roads to Freedom/Center for Independent Living
- North Central Sight Services
- STEP Area Agency on Aging
- STEP Head Start
- STEP Service Navigation
- Hope Enterprises
- Community Services Group
- River Valley Health & Dental Clinic
- Lycoming College-Disability Services
- Pennsylvania College of Technology-Disability Services
- Lycoming County Assistance Office-Department of Human Services

- Clinton County Assistance Office-Department of Human Services
- Housing Authority of Lycoming County
- Clinton County Housing Authority

The information sessions will be offered to additional agencies as identified. Any person or agency with internet access will be able to access and download the plan from STEP Transportation's website. Alternatively, any person or agency may request a copy of the plan via telephone, fax, mail, or in person, and shall be provided a copy of the plan at no cost.

Finally, a Statement of Notification will be posted at the following STEP Transportation locations:

STEP Transportation-Administrative Offices
2138 Lincoln Street
Williamsport, PA 17701

STEP Transportation-Operation Center
Clinton County Community Center
124 East Walnut Street
Lock Haven, PA 17745

Questions or comments regarding the LEP Plan may be submitted to STEP TRANSPORTATION's Program Director:

Dan Merk, Transportation Program Director
STEP Transportation
2138 Lincoln Street
Williamsport, PA 17701
Telephone: (570) 601-9675

APPENDIX A

Title VI Investigations

Title VI Notice to Public

Title VI Complaint Procedures

Title VI Complaint Form

“I Speak” Card

Office Procedures

STEP TRANSPORTATION TRANSIT-RELATED TITLE VI INVESTIGATIONS, COMPLAINTS & LAWSUITS

Program Years:

1. July 1, 2021-June 30, 2022
2. July 1, 2022-June 30, 2023
3. July 1, 2023-June 30, 2024

Nature	Date (Month, Day, Year)	Summary (Basis of Complaint: Race, Color, or National Origin)	Status	Action(s) Taken
Investigations				
1. N/A				
2.				
Lawsuits				
1. N/A				
2.				
Complaints				
1. N/A				
2.				

STEP, Inc. Transportation PUBLIC NOTICE

STEP, Inc. Transportation Program Title VI Statement of Policy and Public Notice

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

Any person who believes that they have individually or as a member of any specific class of persons been unlawfully discriminated against may file a formal complaint with STEP, Inc. within 180 days following the date of the alleged incident.

For more information regarding civil rights complaints, please contact:

Ms. Ellen Keegan
Chief Human Resources Officer
STEP, Inc.
2138 Lincoln Street
Williamsport, PA 17701
Phone: 570-326-0587
Fax: 570-601-9517
Email: elkeegan@stepcorp.org

To file a complaint directly with the Federal Transit Administration, submit to:

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



Success Through Engagement & Partnership

STEP, Inc. Transportation Title VI Complaint Procedure

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STEP, Inc. has 60 days to investigate the complaint. If more information is needed to resolve the case, STEP Transportation may contact the complainant. The complainant has 15 business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within 15 business days, STEP Transportation can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

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

Federal Transit Administration Office of Civil Rights
Attn: Title VI Coordinator
East Building 5th Floor-TCR
1200 New Jersey Avenue SE
Washington, DC 20590
(888) 446-4511 (Phone)

POSTING OF PUBLIC NOTICE

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STEP Transportation

Title VI Complaint Form

STEP Transportation Title VI Complaint Procedure is made available in the following locations:

- Agency website, either as a reference in the Notice to Public or in its entirety
- Hard copy in the central office
- Available in appropriate languages for LEP populations, meeting the Safe Harbor Threshold.
- Other, _____

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?	
<input type="checkbox"/> Yes	<input type="checkbox"/> No
If yes, check all that apply:	
<input type="checkbox"/> Federal Agency: _____	
<input type="checkbox"/> Federal Court: _____	<input type="checkbox"/> State Agency: _____
<input type="checkbox"/> State Court: _____	<input type="checkbox"/> 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

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

Ellen Keegan
 Chief Human Resources Officer
STEP, Inc.
 2138 Lincoln Street
 Williamsport, PA 17701
 Email: elkeegan@stepcorp.org
 Phone: 570-326-0587
 Fax: 570-601-9517



LANGUAGE IDENTIFICATION GUIDE

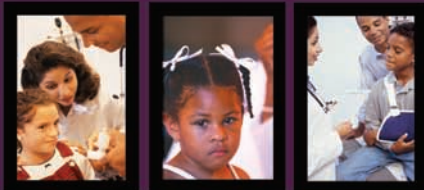
A useful guide to help diverse patients identify their primary language



HEALTH RESEARCH AND EDUCATIONAL TRUST OF NEW JERSEY

760 Alexander Road, Princeton, NJ 08543-0001 | www.njha.com

Produced by the Health Research and Educational Trust of New Jersey, a nonprofit affiliate of the New Jersey Hospital Association, as part of the Patient Race and Ethnicity: Education Campaign to Improve Hospital Data Collection and Reporting project, supported by a grant from the Robert Wood Johnson Foundation.



I SPEAK ...



ARABIC أنا أتحدث اللغة العربية

ARMENIAN Ես խոսում եմ հայերենի

BENGLI আমি বাংলা কথা বলতে পারি

BOSNIAN Ja govorim bosanski

BULGARIAN Аз говоря български

BURMESE ကျွန်တော်/ကျွန်မ မြန်မာလို ပြောတတ်ပါတယ်။

CAMBODIAN ខ្ញុំនិយាយភាសាខ្មែរ

CANTONESE (CHINESE) 我講廣東話
我讲广东话

CROATIAN Govorim hrvatski

CZECH Mluvím česky

DUTCH Ik spreek het Nederlands

FARSI (PERSIAN) من فارسی صحبت می کنم

FRENCH Je parle français

FRENCH CREOLE
(HAITIAN CREOLE) M pale kreyòl ayisyen

GERMAN Ich spreche Deutsch

GREEK Μιλώ τα ελληνικά

GUJARATI ુ ગુજરાતી બોલુ છુ

HEBREW אני מדבר עברית

HINDI मैं हिंदी बोलता हूँ ।

HMONG Kuv has lug Moob

HUNGARIAN Beszélek magyarul

ITALIAN Parlo italiano

JAPANESE 私は日本語を話す

KOREAN 한국어 합니다

LAOTIAN ຂ້ອຍປາກພາສາລາວ

LITHUANIAN Aš kalbu lietuviškai

MANDARIN (CHINESE) 我講國語
我讲国语/普通话

NORWEGIAN Jeg snakker norsk

POLISH Mówi' po polsku

PORTUGUESE Eu falo português do Brasil (Brasil)

Eu falo português de Portugal (Portugal)

PUNJABI ਮੈਂ ਪੰਜਾਬੀ ਬੋਲਦਾ/ਬੋਲਦੀ ਹਾਂ।

ROMANIAN Vorbesc românește

RUSSIAN Я говорю по-русски

SERBIAN Ja говорим српски

SLOVAK Hovorím po slovensky

SPANISH Yo hablo español

SWAHILI Ninaongea Kiswahili

SWEDISH Jag talar svenska

TAGALOG Marunong akong mag-Tagalog

THAI พูดภาษาไทย

TURKISH Türkçe konuşurum

UKRAINIAN Я розмовляю українською мовою

URDU میں اردو بولتا ہوں

VIETNAMESE Tôi nói tiếng Việt

YORUBA Mo nso Yooba

* Registrars should use this tool to guide patients in identifying their spoken language when they do not speak English at all.

SOURCE: Adapted from the State of Ohio's Office of Criminal Justice Services and recommended by the US Department of Health and Human Services - Office of Civil Rights for use by healthcare facilities

LEP OPERATIONAL PROCEDURES

In order to make transportation service available to non-English speaking residents, STEP Transportation contracts with Language Services Associates to utilize the Interpreter Translation Services. This service is available 24/7/365 and provides access to over 230 languages for translation.

In all cases, STEP Transportation staff need to be keenly aware of the process to provide assistance to customers with Limited English Proficiency (LEP). The following is the process for all STEP Transportation staff to follow:

Operator (Driver)

- A. Identify need of LEP individual.
 - Person is unable to speak or understand English “well.”
- B. Utilize “I Speak Card” to obtain preferred language of LEP individual.
- C. Inform passenger that they need to contact main office for assistance.
 - Point to STEP Transportation Phone # on “I Speak Card.”
- D. Contact main office to inform them that LEP individual will be contacting them.
 - Alert them of preferred language requested by LEP individual.

Office Staff

- A. Obtain information from Operator (Driver).
 - Preferred language of LEP individual.
- B. Once contacted by LEP individual, contact Language Service Associates.
- C. When greeted by a Coordinator, identify that you are calling from STEP, Inc and provide our account code.
 - Please request that LEP individual “hold for assistance.”
- D. Identify what language you need or ask for assistance in identifying the language.
- E. Hold momentarily while your interpreter is connected. Once on the line, you will be notified and provided with the interpreter’s ID number.
- F. Explain the objective of the call to the interpreter. Then proceed by speaking directly to the Limited English Proficient speaker in the first person.

Upon completion of the call, all parties should simply hang up. The time will automatically be recorded. It is important for staff to be patient during the process. It can be time consuming depending upon the customers understanding of the process.

APPENDIX B

List of Local Human Service Organizations

STEP Transportation Community Outreach Partners

The following organizations are Transportation Partners who will be involved in the community outreach process. It is anticipated that other agencies will be added as identified.

Center for Independent Living/Roads to Freedom

Clinton County Commissioners

Clinton County Community Center

Clinton County Department of Human Services

Clinton County Housing Authority

Clinton County Planning Department

Community Services Group

Geisinger Medical Center Danville

Hope Enterprises

Housing Authority of Lycoming County

Lycoming College Disability Services

Lycoming County Commissioners

Lycoming County Department of Human Services

Lycoming-Clinton Mental Health/Intellectual Disabilities

North Central Dialysis

North Central Sight Services

Pennsylvania College of Technology Disability Services

River Valley Health & Dental Clinic

River Valley Transit Authority

SEDA-COG MPO

STEP Area Agency on Aging

STEP Head Start

STEP Service Navigation

UPMC - Williamsport

Williamsport Area Transportation Study (WATS) Metropolitan Planning Organization

Williamsport Family Medicine

APPENDIX C

Title VI Training Presentation



Success Through Engagement & Partnership

Transportation Title VI Training

Title VI Overview

- Civil Rights Act of 1964
- Prohibits discrimination of persons based on:
 - Race
 - Color
 - National Origin
- Applies to any Transportation Program receiving Federal financial assistance
 - Institution-wide application Federal requirement

Title VI Requirements

- Notify public of rights
- Establish and publicize program procedures and complaint process/form
- Document and report transit-related Title VI investigations, complaints, and lawsuits
- Promote public participation
- Limited English Proficiency (LEP) plan
 - Census data
- Develop system standards and policies

LEP 2022 Census numbers Lycoming & Clinton County

- According to the 2022 American Community Survey 5-Year Estimates, there are a total of 143,818 persons in Lycoming & Clinton County aged five years and older. A total of 6,687 persons (4.6%) speak a language other than English at home, and 1,735 persons (1.2%) speak English less than very well. Lycoming & Clinton County is lower than the statewide percent of 5.0% primary non English speaking population. This LEP population breakdown for Lycoming & Clinton County is illustrated below.

Four Factor Analysis

- Goal is to provide meaningful access to the benefits, services, information and other important portions of programs and activities to LEP persons.
- What are the four factors?
 1. The number and proportion of LEP persons served in the eligible population.

STEP has determined that number to be less than 1% based on census data.
 2. The frequency with which LEP individuals come into contact with the program.

Via data from it's Interpretac reports and surveys of operators and staff STEP has determined it to be "rare."

Four Factor Analysis

3. The nature and importance to people's lives of the program, activity or service provided.

STEP provides transportation services for more than 3,000 passengers annually. To assist LEP persons STEP has 35 vans equipped with bi-lingual interior signage. We do not believe any language barriers exist that prevent LEP persons from benefitting from our services.

4. The resources available to the recipient for LEP outreach and associated costs.

Translation services upon advanced notification, LEP translation services through Language Service Associates. STEP Transportation will continue to monitor LEP requests .

LEP Procedures – Operator

- Identify need of LEP individual
 - Person is unable to speak or understand English “well”
- Utilize “I Speak Card” to obtain preferred language of LEP individual
- Inform passenger that they need to contact main office for assistance
 - Point to STEP Transportation Phone # on “I Speak Card”
- Contact main office to inform them that LEP individual will be contacting them
 - Alert them of preferred language requested by LEP individual

LEP Procedures – Office Staff

- Obtain information from Operator
 - Preferred language of LEP individual
- Once contacted by LEP individual, contact Language Service Associates
 - Please request that LEP individual “hold for assistance”
- Identify you are calling from STEP Transportation, provide your name and phone # and provide “Customer Code”
- Identify what language you need, or ask for assistance
- Hold until connected. Once on the line, you will be provided with the interpreter’s ID number
- Explain the objective of the call. Then proceed.