

***Federal Transit Administration
Title VI Program***

**Hilltown Community Development
Corporation**

June 8th, 2023

(Plan expires 3 years from date approved by the board)

Title VI Plan Table of Contents

The **Hilltown Community Development Corporation** Title VI plan includes the following elements:

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Section 1: Title VI Plan Approval & Compliance Requirements

Title VI Plan 6/8/2023
Adopted on: _____

Adopted by: Hilltown Community Development
Corporation's Board of Directors

Signature: Dave _____

Title: EXECUTIVE DIRECTOR _____

Approval: See next page for meeting minutes.

Annual Certifications and Assurances

In accordance with 49 CFR Section 21.7(a), every application for financial assistance from FTA must be accompanied by an assurance that the applicant will carry out the program in compliance with Title VI regulations. This requirement shall be fulfilled when the applicant/recipient submits its annual certifications and assurances. Primary recipients will collect Title VI assurances from sub-recipients prior to passing through FTA funds.

Hilltown Community Development Corporation will remain in compliance with this requirement by annual submission of certifications and assurances as required by MassDOT.

The date of last submission of these certifications and assurances (at the time of this Plan's approval) is: June 7, 2023

Title VI Plan Revision Log

Date Month/day/year	Section Revised	Summary of Revisions

Hilltown CDC Board Meeting Minutes

Thursday, June 8, 2023 4pm

In Attendance: Sarah Hamilton, Susan Slattery, Krissy Zdaniewicz, Michele Morris

Absent: Liam Gude and Shelley Moreau

Staff: Dave Christopolis

Due to vacations the May board meeting was scheduled for June 8.

Meeting was called to order at 4pm.

Executive Director Dave Christopolis provided an update on the agency's cash flow. A \$50k line of credit was accessed last month to help pay some vendors. Dave reported that the closing for Chester Commons is scheduled for mid-May. This will help with much of the cash flow issue.

The board had to discuss some business and review some requests from the Executive Director

Dave requested that two new accounts be open at Florence Bank for the Chester Commons project. A motion was made by Susan Slattery to open an account for Chester Commons LLC. Second by Michele Morris. All voted in favor. Motion passed.

Michel Morris made a motion to open an account for Chester Commons MM LLC. Second by Kris Z. All voted in favor. Motion passed.

Dave requested approval for an additional \$50k line of credit at Florence Bank to manage the current cash flow shortage. Sarah asked how long we expect to use the line of credit. Dave stated that once Chester Commons closes, we should not need the line of credit anymore. The line of credit should be zeroed out by September/October. Susan S. made a motion to approve an additional \$50k LOC. Second by Kris Z. All voted in favor. Motion passed.

Kris Z. made a motion to remove Susan Bronstein as a signatory on all Florence Bank accounts and add Susan Slattery, the current Board President.

Dave also reported that the agency just went through a civil rights review with MA DOT for our transportation funding. This review resulted in the agency having to update a number of policies. The following policies were reviewed by the board.

- Title VI civil rights plan
- ADA policy
- Driver Pool policy
- Billing and Collections for driver pool program

Susan S. made a motion to approve all four policies. Second by Michele M. All voted in favor. Motion passed.

Dave discussed the FY 2022 audit schedule and requested keeping the June 20 meeting for any Chester Commons business and reschedule the July board meeting to accommodate the audit review. Dave will check with the auditors and get a date for the July meeting where the board will review and approve the FY 2022 audit.

Meeting adjourned at 6:05p.m.

Respectfully submitted,

Dave Christopolis

Section 2: Title VI Policy Statement

Policy Statement

The **Hilltown Community Development Corporation**, operating transit provider, as a recipient of Federal Transit Administration (FTA) grant dollars either directly from FTA or through the Massachusetts Department of Transportation (MassDOT), will comply with the Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), the U.S. Department of Transportation implementing regulations, FTA Circular 4702.1B, and MassDOT Public Transportation requirements as specified in Master Grant Agreement, and State Management Plan. **Hilltown Community Development Corporation** operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act.

Section 3: Notice to the Public

Title VI Notice to the Public

The Hilltown Community Development Corporation's Notice to the Public is as follows:

Notifying the Public of Rights Under Title VI

Hilltown Community Development Corporation

- The **Hilltown Community Development Corporation** operates its programs 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 the Hilltown Community Development Corporation.
- For more information on the **Hilltown Community Development Corporation's** civil rights program, the procedures to file a complaint, or to file a complaint, please contact **Ed Pelletier, Transportation Coordinator** at **413-296-4232**, email ride@hilltowncdc.org or visit our administrative office 387 Main Road, Chesterfield MA 01012. For more information, visit www.hilltowncdc.org
- For transportation-related Title VI matters, a complaint may also be filed directly with the:
Massachusetts Department of Transportation, Office of Diversity and Civil Rights, Attn: Title VI Specialist, 10 Park Plaza, Suite 3800, Boston, MA 02116; (857) 368-8580; TTY: 711; MassDOT.CivilRights@dot.state.ma.us

Federal Transit Administration, Office of Civil Rights, Attention: Complaint Team, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.
- If information is needed in another language, contact 413-296-4536 x 116.

The Hilltown Community Development Corporation's Notice to the Public is posted in the public areas of the office and inside the transit vehicles.

1. Website: www.hilltowncdc.org/transportation

Section 4: Title VI Complaint Procedure

The **Hilltown Community Development Corporation's** Title VI Complaint Procedure is made available in the following locations:

- Agency website, if available: hilltowncdc.org
 - Hard copy in the central office
 - Agency Title VI Plan
-

Any individual, group of individuals or entity that believes they have been discriminated against on the basis of race, color, or national origin by the **Hilltown Community Development Corporation** may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form.

Any individual having filed a complaint or participated in the investigation of a complaint shall not be subjected to any form of intimidation or retaliation. Individuals who have cause to think that they have been subjected to intimidation or retaliation can file a complaint of retaliation following the same procedure for filing a discrimination complaint.

A complaint must be filed with the **Hilltown Community Development Corporation** no later than 180 days after the following:

1. The date of the alleged act of discrimination; or
2. The date when the person(s) became aware of the alleged discrimination; or
3. Where there has been a continuing course of conduct, the date on which that conduct was discontinued of the latest instance of the conduct.

Once the complaint is received, the **Hilltown Community Development Corporation** will review it to determine if our office has jurisdiction. A copy of each Title VI complaint received will be forwarded to the Massachusetts Department of Transportation within ten (10) calendar days of receipt. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office.

The **Hilltown Community Development Corporation** has 45 days to investigate the complaint. If more information is needed to resolve the case, the **Hilltown Community Development Corporation** may contact the complainant requesting further information. The complainant has 7 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 # business days, the **Hilltown Community Development Corporation** can administratively close the case.

After the investigator reviews the complaint, the agency will issue one of two (2) letters to the complainant: a closure letter or a letter of finding (LOF).

- ✓ A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed.
- ✓ A letter of finding (LOF) summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member, or other action will occur.

If the complainant wishes to appeal the decision it must direct the appeal to the agency initially. The complainant has 10 days after the date of the closure letter or the letter of finding to do so. If there is

outstanding concern, the appeal may be directed to the state DOT or FTA. The appeal process information will be included in the letter.

A person may also file a complaint directly with the: Massachusetts Department of Transportation, Office of Diversity and Civil Rights, Attn: Title VI Specialist, 10 Park Plaza, Suite 3800, Boston, MA 02116; (857) 368-8580; TTY: 711; MassDOT.CivilRights@dot.state.ma.us;

Or

Federal Transit Administration, Office of Civil Rights, Attention: Complaint Team, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.

If information is needed in another language, then contact **413-296-4536 x 116**

Section 5: Title VI Complaint Form

The Hilltown Community Development Corporation's ADA/Title VI Complaint Form is made available in the following locations:

- Agency website, if available: www.hilltowncdc.org
- Hard copy in the central office
- Agency Title VI Plan

Please check one of the following below:

ADA Complaint or Title VI Complaint

Part I.

Name: _____

Address: _____

Telephone: _____

Email Address: _____

Additional Formats Needed:

- None
- TDD
- Large Print
- Audio Tape
- Other

Part II.

Are you filing this complaint on your own behalf?

- Yes – Proceed to Part III
- No – Please provide the name of and your relationship with this person:

Name of Individual: _____

Your Relationship: _____

Please explain why you have filed for a third party:

Confirm:

- I have obtained permission of the aggrieved party to file this form on his or her behalf.
- I have not confirmed permission to file this form on behalf of the aggrieved party.

Part III.

I believe the discrimination I experienced was based on:

<u>Title VI</u>	<u>ADA</u>
<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin	<input type="checkbox"/> Disability

Other: _____

Date of the alleged discrimination: _____

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.

Part IV.

Have you previously filed an ADA and/or Title VI complaint with this agency?

Yes

No

Part 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 the contact information for a person at the agency or court where the complaint was filed:

Name: _____

Title: _____

Agency: _____

Address: _____

Telephone: _____

Email: _____

Part VI.

Name of agency complaint is against: _____

Contact person: _____

Title: _____

Telephone number: _____

Important Notice: To protect your rights, your complaint must be filed within 180 days following the date of the alleged discrimination. Failure to file within 180 days may result in dismissal of the complaint. You may attach any additional written materials or other information that you think is relevant to your complaint to this form.

Signature and date required below.

Signature of Person Filing Complaint

Date

Please submit this form to:

Hilltown Community Development Corporation
387 Main Road, PO Box 17
413-296-4232
ride@hilltowncdc.org

Section 6: List of Transit Related Title VI Investigations, Complaints and Lawsuits

The **Hilltown Community Development Corporation** maintains a list or log of all Title VI investigations, complaints and lawsuits, pertaining to its transit-related activities.

Check One:

 X There have been no investigations, complaints and/or lawsuits filed against us since the last plan submission.

 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
Investigations				
1.				
2.				
Lawsuits				
1.				
2.				
Complaints				
1.				
2.				

Section 7: Public Participation Plan

Strategies and Desired Outcomes

To promote inclusive public participation, the **Hilltown Community Development Corporation** will employ the following strategies, as appropriate (make these determinations based on a demographic analysis of the population(s) affected, type of plan, program and/or service under consideration, and the resources available):

- ✓ Provide for early, frequent and continuous engagement by the public
- ✓ Select accessible and varied meeting locations and times
- ✓ Employ different meeting sizes and formats
- ✓ Use social media in addition to other resources as a way to gain public involvement
- ✓ Use radio, television or newspaper ads on stations and in publications that serve LEP populations. Outreach to LEP populations may also include audio programming available on podcasts.
- ✓ Expand traditional outreach methods by visiting minority-owned or oriented stores/markets and restaurants, community centers, libraries, faith-based institutions, local festivals, etc.

Public Outreach Activities

The public outreach and involvement activities conducted by the **Hilltown Community Development Corporation** since the last Title VI Program submission are summarized in the table below.

Specific Public Participation activities are listed in the table below:

Event Date	Partner Agencies	Activity	Communication Method (Public notice, posters, social media)	Notes
On Going	Hilltown Health Centers	Outreach	Brochures, Fliers	
On Going	Hilltown Council on Aging	Outreach	Brochures, Fliers	

Section 8: Language Assistance Plan

Plan Components

As a recipient of federal US DOT funding, the **Hilltown Community Development Corporation** is required to take reasonable steps to ensure meaningful access to our programs and activities by limited-English proficient (LEP) persons.

Limited English Proficient (LEP) refers to persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. This includes those who have reported to the U.S. Census that they speak English less than very well, not well, or not at all.

The **Hilltown Community Development Corporation's** Language Assistance Plan includes the following elements:

Item #1: The results of the *Four Factor Analysis*, including a description of the LEP population(s), served.

Item #2: A description of how language assistance services are provided by language

Item #3: A description of how LEP persons are informed of the availability of language assistance service

Item #4: A description of how the language assistance plan is monitored and updated

Item #5: A description of how employees are trained to provide language assistance to LEP persons

Four Factor Analysis Methodology

To determine if an individual is entitled to language assistance and what specific services are appropriate, the **Hilltown Community Development Corporation** has conducted a *Four Factor Analysis* of the following areas: 1) Limited-English Proficient (LEP) Speaker Demography, 2) Contact Frequency, 3) Importance of Service, and 4) Resources and Costs.

Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient. In addition to the number or proportion of LEP persons served, the **Hilltown Community Development Corporation's** will identify:

- (a) How LEP persons interact with the recipient's agency;
- (b) Identification of LEP communities, and assessing the number or proportion of LEP persons from each language group to determine the appropriate language services for each language;
- (c) The literacy skills of LEP populations in their native languages, in order to determine whether translation of documents will be an effective practice; and
- (d) Whether LEP persons are underserved by the recipient due to language barriers.

Factor 2: The frequency with which LEP persons come into contact with the program: Identifies and assesses the frequency **Hilltown Community Development Corporation's** staff comes into contact with LEP persons. Examples of contact could include:

- (a) Use of bus and rail service;
- (b) Purchase of tickets through vending machines, outlets, websites, and over the phone;
- (c) Participation in public meetings;
- (d) Customer service interactions;
- (e) Ridership surveys;
- (f) Operator surveys.

Factor 3: The nature and importance of the program, activity, or service provided by the program to people's lives. Generally speaking, the more important the program, the more frequent the contact and the likelihood that language services will be needed.

Factor 4: The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach. Resource and cost issues can often be reduced by technological advances, reasonable business practices, and the sharing of language assistance materials and services among and between recipients, advocacy groups, LEP populations and Federal agencies. Large entities and those entities serving a significant number of LEP persons should ensure that their resource limitations are well substantiated before using this factor as a reason to limit language assistance.

Item #1 – Results of the Four Factor Analysis *(including a description of the LEP population(s) served)*

Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered.

According to the US Census Bureau, broken down by census tract, of the 10,830 residents in the **Hilltown Community Development Corporation** service area, 47 residents describe themselves as speaking English less than "very well". People of Spanish descent are the primary LEP persons likely to utilize Hilltown Community Development Corporation services. For the Hilltown Community Development Corporation service area, the latest U.S. Census Bureau data shows that among the area's population .004% speak English "*less than very well.*" **For these groups** who speak English "less than very well", the majority speak Spanish, followed by French, Haitian, Cajun, and Russian, Polish, and other Slavic languages. There is mention of other Indo-European languages but not specified on the Census Bureau report.

Factor 2: The frequency with which LEP persons come into contact with the program.

Hilltown Community Development Corporation assessed the frequency with which staff and drivers have, or could have, contact with LEP persons. Hilltown Community Development Corporation provides approximately 250 passenger trips per year. If an individual has speech limitations, the dispatcher or driver will work with the Massachusetts Department of Transportation, if needed, to ensure the individual receives access to the transit services.

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

All of Hilltown Community Development Corporation's programs are important; however, those related to safety, public transit, nondiscrimination and public involvement are among the most important. The Hilltown Community Development Corporation is committed to providing

meaningful access and will provide written translation for any of its documents, when reasonable, effective and with the available resources. In other cases, the **Hilltown Community Development Corporation** will strive to provide alternative but meaningfully accessibility. Moreover, the Hilltown Community Development Corporation continually evaluates its programs, services, and activities to ensure that persons who may be LEP are always provided with meaningful access. The Title VI policy, complaint form, and LEP policy are available in Spanish upon request.

Factor 4: The resources available for LEP outreach, as well as the costs associated with that outreach.

The **Hilltown Community Development Corporation** makes every effort to make its programs, services, and activities, accessible to LEP individuals. The **Hilltown Community Development Corporation** will use available resources, both internal and external to accommodate reasonable requests for translations.

Item # 2 – Description of how Language Assistance Services are Provided, by Language

The Hilltown Community Development Corporation has identified, developed, and uses the following:

- a) Individuals who have contact with the public are provided with “I Speak” language cards to identify language needs in order to match them with available services. Language cards verified and distributed by the Director as need.
- b) The Hilltown Community Development Corporation has developed partnerships with local agencies, organizations, local school districts and social service agencies that are available to assist with it LEP responsibilities.

Item # 3 – Description of how LEP Persons are Informed of the Availability of Language Assistance Service

In order to ensure that LEP individuals are aware of **Hilltown Community Development Corporation** language assistance measures, Hilltown Community Development Corporation provides the following:

- Title VI Program including the Language Assistance Plan is made available on website, if applicable, and hard copy in central office.
- Drivers and dispatchers are provided “I Speak” language cards to identify language needs in order to match them with available services.

Item # 4 – Description of how the Language Assistance Plan is Monitored and Updated

Hilltown Community Development Corporation will continue to update the LEP plan as required by U.S. DOT. At a minimum, the Title VI Plan will continue to be reviewed and updated every three (3) years in conjunction with the Title VI submission and use data from the U.S. Decennial Census or the American Community Survey as available, or when it is clear that the concentrations of LEP individuals are present in the Hilltown Community Development Corporation service area.

Updates will continue to include the following:

- The number of documented LEP person contacts encountered annually.
- How the needs of LEP persons have been addressed.
- Determination of the current LEP population in the service area.
- Determination as to whether the need for translation services has changed.
- Determine whether local language assistance programs have been effective and sufficient to meet the need.
- Determine whether Hilltown Community Development Corporation's financial resources are sufficient to fund language assistance resources needed.
- Determine whether Hilltown Community Development Corporation has fully complied with the goals of this LEP Plan.
- Determine whether complaints have been received concerning Hilltown Community Development Corporation's failure to meet the needs of LEP individuals

Item # 5 - Description of how Employees are Trained to Provide Language Assistance to LEP Persons

The following training will continue to be provided to **Hilltown Community Development Corporation** staff:

- Information on the Hilltown Community Development Corporation Title VI Procedures and LEP responsibilities.
- Description of language assistance services offered to the public.
- Use of "I Speak" language cards (used to identify language preference).
- Documentation of language assistance requests.
- How to handle a potential Title VI / LEP complaint.

Limited English Proficient (LEP) Resource Materials:

LEP Policy

Hilltown Community Development Corporation shall provide for communication for limited English proficient riders to ensure them equal opportunity to benefit from services. Family members or friends of limited English proficient riders will not be used as translators unless specifically requested by that individual. Arrangements have been made with Insert resource/agency to obtain translators. The agency will also utilize web-based translator programs if available.

If you need help with English, please call 413-296-4536 x116.

"I Speak" Language Identification Card

Note: For additional languages visit the US Census Bureau website <http://www.lep.gov/ISpeakCards2004.pdf>

Mark this Box if you speak...	Language Identification Chart	Language
	Mark this box if you read or speak English	English
	Marque esta casilla si lee o habla español	Spanish
	Kos lub voj no yog koj paub twm thiab hais lus Hmoob	Hmong
	如果说中国在方框内打勾	Chinese
	Xin ñaunh daáu vaø oâ naøy neáu quyù vò bieát ñoïc vaø noui ñöôic Vieät Ngöô.	Vietnamese
	당신이한국어말할경우이 상자를표시	Korean
	Markahan itong kuwadrado kung kayo ay marunong magbasa o magsalita ng Tagalog.	Tagalog
	Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen	German
	Отметить этот флажок, если вы говорите по-русски	Russian
	Означите ову кућицу ако говорите српски	Serbian
	आप हिंदी बोलते हैं तो इस बक्से को चिह्नित करें	Hindi
	پر نشان لگائیں تو اس باکس بولتے ہیں اردو اگر آپ	Urdu

Log of LEP Encounters

Date	Time	Language Spoken By Individual (if available)	Name and Phone Number of Individual (if available)	Service Requested	Follow Up Required	Staff Member Providing Assistance	Notes

Section 9: Minority Representation Information

Recipients that have **transit-related**, non-elected planning boards, advisory councils or committees, or similar committees, the membership of which is selected by the recipient, must provide a table depicting the racial breakdown of the membership of those committees, and a description of efforts made to encourage the participation of minorities on such committees.

***Guidance:** Elected transit-related boards, committees, or councils, do not need to complete the table below, and write in section B that there are no non-elected transit-related boards, committees, or councils.

A. Minority Representation Table

Table Depicting Membership of Board, Committees, Councils, Broken Down by Race

Body	Caucasian	Hispanic	African American	Asian American	Native American	Two or More Races
Population	98.5%	.5%	0%	.2%	.3%	0%
Board of Directors	100%	0%	0%	0%	0%	0%

B. Efforts to Encourage Minority Participation

*To encourage participation on its boards, committees, and councils, the **Hilltown Community Development Corporation** will make every effort to encourage minority participation on the boards.*

Section 10: Providing Assistance to and Monitoring Subrecipients

1. Does agency provide funding to subrecipients?

No, the agency does not have subrecipients.

Section 11: Title VI Equity Analysis for Facility Acquisition

Title 49 CFR, Appendix C, Section (3)(iv) requires “the location of projects requiring land acquisition and the displacement of persons from their residences and business 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 they are considered transit amenities. It also does not include transit stations, power substations, or any other project evaluated by the National Environmental Policy Act (NEPA) process. Facilities included in the provision include, but are not limited to, storage facilities, maintenance facilities, operations centers, etc. Has the agency built a facility? (check a response below)

No, the agency has not built a facility.

Section 12: Fixed Route Transit Providers Service Standards and Policies

FTA Circular 4702.1B, Chapter III, Paragraph 10: All fixed route transit providers shall set service standards and policies for each specific fixed route mode of service they provide.

Hilltown Community Development Corporation:

is a fixed route transit provider

is **not** a fixed route transit provider

