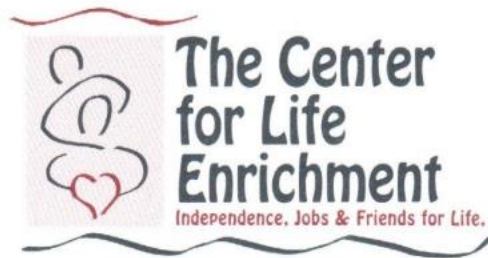


TITLE VI
2025-2026 IMPLEMENTATION PLAN
TITLE VI OF THE CIVIL RIGHTS ACT OF 1964



Updated October 2025

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INTRODUCTION

Title VI of the Civil Rights Act of 1964 prohibits discrimination based on race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that "no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance." (42 U.S.C. Section 2000d).

The Civil Rights Restoration Act of 1987 clarified the intent of Title VI to include all programs and activities of Federal-aid recipients, sub-recipients, and contractors whether those programs and activities are federally funded or not.

Recently, the Federal Transit Administration (FTA) has placed renewed emphasis on Title VI issues, including providing meaningful access to persons with Limited English Proficiency.

Recipients of public transportation funding from FTA and the Maryland Transit Administration (MTA) are required to develop policies, programs, and practices that ensure that federal and state transit dollars are used in a manner that is nondiscriminatory as required under Title VI.

This document details how The Center for Life Enrichment, a private non-profit organization, incorporates nondiscrimination policies and practices in providing transportation services to its clients.

OVERVIEW OF SERVICES

The mission of The Center for Life Enrichment is to provide programs and support services that will increase the vocational and personal potential of individuals with disabilities.

The vision of the Center for Life Enrichment is to provide individuals we support with access to community opportunities to the same degree as individuals without disabilities

- Life Choices
- Employment (Competitive and Integrated)
- Recreation and Leisure activities
- Companions

The Center for Life Enrichment (previously St. Mary's County Developmental Center) has over a forty-year history of providing pre-vocational, vocational, socialization, recreation and advocacy services to adult individuals with disabilities in St. Mary's and Calvert Counties. Our licensing or auditing entities include, United States Department of Labor, Maryland Department of Health and Mental Hygiene, Maryland Department of Education and National Industries for the Severely Handicapped.

In addition to the 160 individuals with developmental disabilities, funded by the Department of Health and Mental Hygiene, the center also provides job development, job coaching and work adjustment training for the Maryland Department of Education - Division of Rehabilitation Services, and employs disabled individuals to fulfill contract obligations.

The Center has two programming sites located in St. Mary's and Calvert Counties:

1. Meaningful Day services at our main facility located in Hollywood, MD.
2. Meaningful Day services at our additional location in Prince Frederick, MD.

The Center has two employment training facilities in St. Mary's County:

1. Vintage Values in Leonardtown, MD.
2. Vintage Values in Lexington, MD.

Work training is provided to consumers in the areas of custodial maintenance, shelf stocking, retail sales, and commercial domestic services. In conjunction with vocational training the center also provides training in self-help skills. The Supported Employment Program develops employment opportunities where disabled individuals supported by the Center, are hired by local businesses. Listed below are highlights of programs and opportunities provided by The Center for Life Enrichment:

The Supported Employment Program:

Designed to provide an employment support system with the primary goal of individual job placement and continued support in the community. Our facility is the only program in the county which provides such a range of support to people with disabilities.

Jobs in the Competitive Market:

The Center presently assists disabled individuals in obtaining and then retaining community-based employment. Positions held include food service, custodial, housekeeping, data entry, laundry and shelf stocking. In the past year TCLE assisted 40 disabled individuals in finding or maintaining competitive employment or finding volunteer opportunities.

Utilizing the center's extensive database, individuals are assisted with locating and obtaining desired positions. The Center for Life Enrichment then provides one-to-one training by a job coach, beginning intensely and fading as the person becomes independent. This training is goal-orientated and also includes participation in seminars and Employment Club gatherings.

Service Jobs in the Community:

1. Vintage Values Thrift Stores/Training Facilities

Vintage Values are thrift/convenience stores operated by the Center to teach skills in retail sales such as stocking, pricing, inventory, operating a cash register and social skills.

2. Volunteer Opportunities

In the past year The Center for Life Enrichment also offered expanded volunteer opportunities to disabled individuals supported by the Center. This was in response to a soft economy where regular employment opportunities were scarce or non-existent. Assisting the County with litter pick-up at County transfer stations, policing County Parks to help with litter control, and collecting aluminum cans from local business for recycling were all activities that disabled individuals participated in. Consumers also participate in daily routes for Meals on Wheels. Through volunteering in nature, these activities assisted individuals in learning basic work skills.

The Center for Life Enrichment also provides job coaching and transportation for individuals with disabilities to various volunteer opportunities in our local community. These opportunities include the hospital, health department, animal shelters, Petco and other county areas.

Vocational Training

This area offers training in cognitive and vocational skills, communication and mobility. Paid work from area businesses and product manufacturing are the emphasis here.

Day Habilitation

The Center's Day Habilitation program provides a wide range of services for adults with disabilities. Individuals can access opportunities for education and self-help, and for the development of interpersonal, vocational and employment skills. Communication, socialization, health and personal growth are the foundations of the program. Individuals may request and receive:

Nursing Delegation

Family and Individual Support Services

Individual support services provide the opportunity for people with disabilities to be supported in their homes, with a wide range of natural and community-based services, so that everyone can function as independently as possible. This service is created to be flexible and meet the needs of those individuals requesting the service. Individuals may request and receive:

- Training and support for self-advocacy
- Therapeutic services
- Individual and family counseling
- Respite services
- Transportation assistance
- Community integration services
- Maximize the individual's independence in the community
- Supports necessary to maintain family unity

Peer Activities and Learning Services

Peer Activities and Learning Skills (PALS) is a program that provides disabled individuals in the community who need support services an opportunity to participate in an activity program. This program provides five evenings per week of community sponsored activities with transportation assistance to and from each event. Events include social events, dances, movies, dinner, shopping and living skills such as cooking, money skills, and writing skills. The program serves up to 62 individuals with the opportunity to utilize 25 to 30 hours of support each week.

Transportation

Due to the limited availability of public transportation, in both St. Mary's and Calvert counties, The Center for Life Enrichment must provide transportation services for all Center programs.

To carry out this service, the Center maintains a fleet of 67 vehicles, with 16 vehicles being wheelchair accessible.

Last year TCLE vehicles traveled over eight hundred thousand miles. Agency Drivers are not required to have CDL licensing due to the size of our vehicles, however, bus drivers are required to pass a DOT physical, maintain a good driving record, pass random drug screening, complete all State mandated and safety training. All Center staff receive training in operating wheelchair equipment, driving and proper inspection of Agency vehicles.

Buses acquired through the 5310 grants are utilized to provide transport from home to employment and Center programming. During the midday they are utilized to take Consumers to paid and volunteer employment opportunities.

Requests for transportation have been submitted by STS [the local transit service], the Department of Aging, the Department of Social Services and the St. Mary's Health Department

from Individuals with disabilities. These needs are accepted and provided when we are able to work the individual's needs into one of the fixed routes.

POLICY STATEMENT AND AUTHORITIES

Title VI Policy Statement

The Center for Life Enrichment is committed to ensuring that no person shall, on the grounds of race, color, national origin, as provided by Title VI of the Civil Rights Act of 1964 and the Civil Rights Restoration Act of 1987 (PL 100.259), be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity, whether those programs and activities are federally funded or not.

The Center for Life Enrichment is an organization described in section 501(c) (3) of the Internal Revenue Code

The Center for Life Enrichment's Title VI Manager is responsible for initiating and monitoring Title VI activities, preparing required reports, and other responsibilities as required by Title 23 Code of Federal Regulations (CFR) Part 200, and Title 49 CFR Part 21.

Signature of Authorizing Official

Date

Randall Ferguson, Executive Director

The Center for Life Enrichment

Title VI Authorities

TITLE VI OF THE 1964 CIVIL RIGHTS ACT PROVIDES THAT NO PERSON IN THE UNITED STATES SHALL, ON THE GROUNDS OF RACE, COLOR, NATIONAL ORIGIN, OR SEX, BE EXCLUDED FROM PARTICIPATION IN, BE DENIED THE BENEFITS OF, OR BE OTHERWISE SUBJECTED TO DISCRIMINATION UNDER ANY PROGRAM OR ACTIVITY RECEIVING FEDERAL FINANCIAL ASSISTANCE (REFER TO 49 CFR PART 21). THE CIVIL RIGHTS RESTORATION ACT OF 1987 BROADENED THE SCOPE OF TITLE VI COVERAGE BY EXPANDING THE DEFINITION OF THE TERMS “PROGRAMS OR ACTIVITIES” TO INCLUDE ALL PROGRAMS OR ACTIVITIES OF FEDERAL AID RECIPIENTS, SUB RECIPIENTS, AND CONTRACTORS, WHETHER SUCH PROGRAMS AND ACTIVITIES ARE FEDERALLY ASSISTED OR NOT.

Additional authorities and citations include: Title VI of the Civil Rights Act of 1964 (42 U.S.C. Section 2000d); Federal Transit Laws, as amended (49 U.S.C. Chapter 53 et seq.); Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 U.S.C. 4601, et seq.); Department of Justice regulation, 28 CFR part 42, Subpart F, “Coordination of Enforcement of Nondiscrimination in Federally-Assisted Programs” (December 1, 1976, unless otherwise noted); U.S. DOT regulation, 49 CFR part 21, “Nondiscrimination in Federally-Assisted Programs of the Department of Transportation—Effectuation of Title VI of the Civil Rights Act of 1964” (June 18, 1970, unless otherwise noted); Joint FTA/Federal Highway Administration (FHWA) regulation, 23 CFR part 771, “Environmental Impact and Related Procedures” (August 28, 1987); Joint FTA/FHWA regulation, 23 CFR part 450 and 49 CFR part 613, “Planning Assistance and Standards,” (October 28, 1993, unless otherwise noted);

U.S. DOT Order 5610.2, “U.S. DOT Order on Environmental Justice to Address Environmental Justice in Minority Populations and Low-Income Populations,” (April 15, 1997); U.S. DOT Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient Persons, (December 14, 2005), and Section 12 of FTA’s Master Agreement, FTA MA 13 (October 1, 2006).

Confirmation Letter Internal Revenue Code 501(c)(3)

[View the scanned facsimile of the April 2, 2007 letter](#)

Internal Revenue Service
Department of the Treasury
P. O. Box 2508
Cincinnati, OH 45201

Date: April 2, 2007

Center for Life Enrichment Inc
P. O. Box 610
Hollywood, MD 20636-0610

Person to Contact:
Stephanie Swartzbaugh 31-07594
Customer Service Specialist

Toll Free Telephone Number: 877-829-5500

Federal Identification Number: 52-0799313

Dear Sir or Madam:

This is in response to your request of April 2, 2007, regarding your organization's tax-exempt status.

In January 1965 we issued a determination letter that recognized your organization as exempt from federal income tax. Our records indicate that your organization is currently exempt under section 501(c)(3) of the Internal Revenue Code.

Our records indicate that your organization is also classified as a public charity under sections 509(a)(1) and 170(b)(1)(A)(vi) of the Internal Revenue Code.

Our records indicate that contributions to your organization are deductible under section 170 of the Code, and that you are qualified to receive tax deductible bequests, devises, transfers or gifts under section 2055, 2106 or 2522 of the Internal Revenue Code.

If you have any questions, please call us at the telephone number shown in the heading of this letter.

Sincerely,
Michele M. Sullivan, Oper. Mgr.
Accounts Management Operations 1

NONDISCRIMINATION ASSURANCES TO MTA

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

As part of the Certifications and Assurances submitted to MTA at the time of grant application and award, **The Center for Life Enrichment** submits a Nondiscrimination Assurance which addresses compliance with Title VI as well as nondiscrimination in hiring (EEO) and contracting (DBE), and nondiscrimination on the basis of disability (ADA).

In signing and submitting the assurance, **The Center for Life Enrichment** confirms to MTA our commitment to nondiscrimination and compliance with federal and state requirements.

[View the Minority Representation on Committees by Race](#)

PLAN APPROVAL DOCUMENT

I hereby acknowledge the receipt of the Center for Life Enrichment Title VI Implementation Plan 2018-2020. I have reviewed and approve the Plan. I am committed to ensuring that no person is excluded from participating in or denied the benefits of The Center for Life Enrichment's transportation services on the basis of race, color, or national origin, as protected by Title VI according to C 4702.1B Title VI requirements and guidelines for Federal Transit Administration sub-recipients.

Randall M. Ferguson

October 9, 2025

[Signature of Authorizing Official]

Date

The Center for Life Enrichment

BOARD OF DIRECTORS RESOLUTION

WHEREAS, the Board of Directors of The Center for Life Enrichment (the Employer) has assembled in a meeting this: 28 days of October 2025.

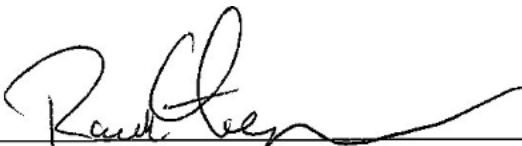
WHEREAS, the Board of Directors approved and reviewed the Title VI Implementation Plan for the MTA Vehicle Grant Program.

WHEREAS, the Board of Directors has adopted the plan as written.

NOW, THEREFORE, BE RESOLVED THAT:

- 1) All sections -of the Plan have been reviewed and approved.
- 2) Description of services complies with current service plan set forth by TCLE.
- 3) The Non-Discrimination Act has been reviewed.
- 4) The plan has been signed by the President of the Board and Executive Director

The undersigned, Randall Ferguson, Executive Director, of the Employer hereby certifies That the foregoing resolutions were duly adopted by the Board of Directors on the ____ day of December 2017.



Executive Director

ORGANIZATION AND TITLE VI PROGRAM RESPONSIBILITIES

Under the authority of The Center for Life Enrichment the Human Resource Director will serve as the Title VI Manager and is responsible for ensuring implementation of the agency's Title VI program. The specific areas of responsibility are described below.

Overall Organization for Title VI

The Title VI Manager and staff are responsible for coordinating the overall administration of the Title VI program, plan, and assurances, including complaint handling, data collection and reporting, annual review and updates, and internal education.

Title VI Manager Responsibilities

The Title VI Manager is charged with the responsibility for implementing, monitoring, and ensuring compliance with Title VI regulations. Title VI responsibilities are as follows:

1. Process the disposition of Title VI complaints received.
2. Collect statistical data (race, color or national origin) of participants in and beneficiaries of agency programs, (e.g., affected citizens, and impacted communities).
3. Conduct annual Title VI reviews of agency to determine the effectiveness of program activities at all levels.
4. Conduct Title VI reviews of construction contractors, consultant contractors, suppliers, and other recipients of federal-aid fund contracts administered through the agency.
5. Conduct training programs on Title VI and other related statutes for agency employees.
6. Prepare a yearly report of Title VI accomplishments and goals, as required.
7. Develop Title VI information for dissemination to the public client group(s) served and, where appropriate, in languages other than English.
8. Identify and eliminate discrimination.
9. Establish procedures for promptly resolving deficiency status and writing the remedial action necessary, all within a period not to exceed 90 days.

General Title VI Responsibilities of the Agency

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

1. Data Collection

To ensure that Title VI reporting requirements are met, The Center for Life Enrichment will maintain:

- A database or log of Title VI complaints received. The investigation of and response to each complaint is tracked within the database or log.

- A written log of the public outreach and involvement activities undertaken to ensure that minority and low-income people had meaningful access to these activities.

2. Annual Report and Updates

As a sub-recipient of FTA funds, The Center for Life Enrichment is required to submit a Quarterly Report Form to the MTA that documents any Title VI complaints received during the preceding quarter and for each year. The Center for Life Enrichment will also maintain and provide to the MTA on an annual basis, the log of public outreach and involvement activities undertaken to ensure that client minority and low-income people have had meaningful access to these activities.

Further, we will submit to MTA updates to any of the following items since the previous submission, or a statement to the effect that these items have not been changed since the previous submission, indicating date:

- A copy of any compliance review report for reviews conducted in the last three years, along with the purpose or reason for the review, the name of the organization that performed the review, a summary of findings and recommendations, and a report on the status or disposition of the findings and recommendations
- Public Participation Plan (PPP)
- Language Assistance Plan (LAP)
- Procedures for tracking and investigating Title VI complaints
- A list of Title VI investigations, complaints or lawsuits filed with the agency since the last submission
- A copy of the agency notices to the public that it complies with Title VI and instructions on how to file a discrimination complaint
- Minority representation on Committees by race

3. Annual Review of Title VI Program

Each year, in preparing for the Annual Report and Updates, the Title VI Manager will review the agency's Title VI program to assure implementation of the Title VI plan. In addition, they will review agency operational guidelines and publications, including those for contractors, to verify that Title VI language and provisions are incorporated as appropriate.

4. Dissemination of Information Related to the Title VI Program

Information on our Title VI program will be disseminated to agency employees, contractors, and beneficiaries, as well as to program beneficiaries, as described in the "Public Outreach and Involvement" section of this document, and in other languages when needed according to the LAP plan as well as Federal and State laws/regulations.

5. Resolution of Complaints

Any individual may exercise his or her right to file a complaint if that person believes that he, she or any other program beneficiaries have been subjected to prohibited non-discrimination requirements or to unequal treatment or discrimination in the receipt of benefits/services. The

Center for Life Enrichment will report the complaint to MTA within three business days (per MTA requirements), and make a concerted effort to resolve complaints locally, using the agency's Title VI Complaint Procedures. All Title VI complaints and their resolutions will be logged as described under Element 1, Data Collection, and reported annually (in addition to immediately) to MTA.

6. Written Policies and Procedures

Our Title VI policies and procedures are documented in this plan and its appendices and attachments. This plan will be updated periodically to incorporate changes and additional responsibilities that arise. During the Annual Title VI Program Review (Element 3 above), the Title VI Manager will determine whether an update is needed.

7. Internal Education

Our employees will receive training in Title VI policies and procedures upon hiring and upon promotion. This training will include requirements of Title VI, our obligations under Title VI (LEP requirements included), and required data that must be gathered and maintained. In addition, training will be provided when any Title VI-related policies or procedures change (agency-wide training), or when appropriate in resolving a complaint. Title VI training is the responsibility of Human Resources Director

8. Title VI Clauses in Contracts

In all Federal procurements requiring a written contract or Purchase Order (PO), The Center for Life Enrichment's contract/PO will include appropriate non-discrimination clauses. The Title VI Manager will work with the Executive Director, who is/are responsible for procurement contracts and POs to ensure appropriate Federal non-discrimination clauses are included.

TITLE VI COMPLAINT PROCEDURES

In order to comply with the reporting requirements established in 49CFR Section 21.9(b), The Center for Life Enrichment shall develop procedures for investigating and tracking Title VI complaints filed against us and will make procedures for filing a complaint available to members of the public. The Center for Life Enrichment has also developed a [Title VI Complaint Form in the Appendices](#). The form and procedure for filing a complaint are available on the Center for Life Enrichment website and at their facilities.

Any individual may exercise his or her right to file a complaint with The Center for Life Enrichment if that person believes that he or she has been subjected to unequal treatment or discrimination in the receipt of benefits or services. We will report the complaint to MTA within three business days (per MTA requirements), and make a concerted effort to resolve complaints locally, using the agency's Nondiscrimination Complaint Procedures. All Title VI complaints and their resolution will be logged and reported annually (in addition to immediately) to MTA.

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

The Center for Life Enrichment includes the following language on all printed information materials, on the agency's website, in press releases, in public notices, in published documents, and on posters on the interior of each vehicle operated in passenger service:

The Center for Life Enrichment is committed to ensuring that no person is excluded from participating in, or denied the benefits of its transportation services based on race, color or national origin, as protected by Title VI in the Federal Transit Administration (FTA) Circular 4702.1B. For additional information on The Center for Life Enrichment's nondiscrimination policies and procedures, or to file a complaint, please visit the website at www.tcle.org or contact Felecia Sorrells, Human Resource Director, P. O. Box 610, Hollywood, MD 20636

Procedures for Handling and Reporting Investigations/Complaints and Lawsuits

Instructions for filing Title VI complaints are posted on the agency's website and provided below. Should any Title VI investigations be initiated by FTA or MTA, or should any Title VI lawsuits be filed against The Center for Life Enrichment, the agency will follow these procedures:

Procedures

- 1) Any individual, group of individuals or entity that believes they have been subjected to discrimination based on race, color, or national origin may file a written complaint with the Title VI Manager.

The complaint is to be filed in the following manner:

- a) A formal complaint must be filed within 180 calendar days of the alleged occurrence.
 - b) The complaint should include:
 - i) complainant's name, address, and contact information (i.e., telephone number, email address, etc.)
 - ii) date(s) of the alleged act of discrimination (if multiple days, include the date when the complainant(s) became aware of the alleged discrimination and the date on which the alleged discrimination was discontinued or the latest instance)
 - iii) Description of the alleged act of discrimination
 - iv) location(s) of the alleged act of discrimination (include vehicle number if appropriate)
 - v) explanation of why the complainant believes the act to have been discriminatory based on race, color, or national origin
 - vi) if known, the names and/or job titles of those individuals perceived as parties in the incident
 - vii) contact information for any witnesses
 - viii) indication of any related complaint activity (i.e., was the complaint also submitted to MTA or FTA?)
 - c) The complaint shall be submitted to the Title VI Manager at **P.O. Box 610, Hollywood, MD 20636** and/or sorrellsfs@tcle.org.
 - d) In the case where a complainant is unable or incapable of providing a written statement, a verbal complaint of discrimination may be made to the Title VI Manager.
- 2) Upon receipt of the complaint, the Title VI Manager will immediately:
 - a) notify MTA (no later than 3 business days from receipt)
 - b) notify The Center for Life Enrichment Authorizing Official
 - c) ensure that the complaint is entered in the complaint database.

- 3) Within 3 business days of receipt of the complaint, the Title VI Manager will contact the complainant by telephone to set up an interview.
- 4) The complainant will be informed that they have a right to have a witness or representative present during the interview and can submit any documentation he/she perceives as relevant to proving his/her complaint.
- 5) If MTA has assigned staff to assist with the investigation, the Title VI Manager will offer an opportunity to participate in the interview.
- 6) The alleged discriminatory service or program official will be given the opportunity to respond to all aspects of the complainant's allegations.
- 7) The Title VI Manager will determine, based on relevancy or duplication of evidence, which witnesses will be contacted and questioned.
- 8) The investigation may also include:
 - a) investigating contractor operating records, policies or procedures
 - b) reviewing routes, schedules, and fare policies
 - c) reviewing operating policies and procedures
 - d) reviewing scheduling and dispatch records
 - e) observing behavior of the individual whose actions were cited in the complaint.
- 9) All steps taken and findings in the investigation will be documented in writing and included in the complaint file.
- 10) The Title VI Manager will contact the complainant at the conclusion of the investigation (but prior to writing the final report) and give the complainant an opportunity to give a rebuttal statement at the end of the investigation process.
- 11) At the conclusion of the investigation and within 60 days of the interview with the complainant, the Title VI Manager will prepare a report that includes a narrative description of the incident, identification of persons interviewed, findings, and recommendations for disposition. This report will be provided to the Authorizing Official, the MTA, and if appropriate our legal counsel.
- 12) The Title VI Manager will send a letter to the complainant notifying them of the outcome of the investigation. If the complaint was substantiated, the letter will indicate the course of action that will be followed to correct the situation. If the complaint is determined to be unfounded, the letter will explain the reasoning and refer the complainant to MTA in the event the complainant wishes to appeal the determination. This letter will be copied to MTA.
- 13) A complaint may be dismissed for the following reasons:
 - a) the complainant requests the withdrawal of the complaint
 - b) an interview cannot be scheduled with the complainant after reasonable attempts
 - c) The complainant fails to respond to repeated requests for additional information needed to process the complaint

TRANSPORTATION-RELATED TITLE VI INVESTIGATIONS, COMPLAINTS, AND LAWSUITS

Background

All sub-recipients shall prepare and maintain a list/log of any of the following that alleges discrimination on the basis of race, color, or national origin:

- Active investigations conducted by FTA and entities other than FTA.
- Lawsuits; and
- Complaints naming the recipient.

This list/log shall include the date that the transportation-related Title VI investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by the recipient in response, or final findings related to the investigation, lawsuit, or complaint. This list/log shall be included in the Title VI Program submitted to MTA every three years and information shall be provided to MTA quarterly and annually.

Public Participation Plan (PPP)

Introduction

The Public Participation Plan (PPP) is a guide for ongoing public participation endeavors. Its purpose is to ensure that The Center for Life Enrichment utilizes effective means of providing information and receiving public input on transportation decisions from low income, minority and limited English proficient (LEP) populations, as required by Title VI of the Civil Rights Act of 1964 and its implementing regulations.

Under Federal regulations, 5310 service providers must take reasonable steps to ensure that Limited English Proficient (LEP) persons have meaningful access to their programs and activities. This means that public participation opportunities, normally provided in English, should be accessible to persons who have a limited ability to speak, read, write, or understand English.

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

The Center for Life Enrichment established a public participation plan or process that will determine how, when, and how often specific public participation activities should take place, and which specific measures are most appropriate.

The Center for Life Enrichment will make these determinations based on a demographic analysis of the population(s) affected, the type of plan, program, and/or service under consideration, and the resources available. Efforts to involve minority and LEP populations in public participation activities may include both comprehensive measures, such as placing public notices at all transit stations, stops, and vehicles, as well as targeted measures to address linguistic, institutional, economic, historical, or other barriers that may prevent minority and LEP persons from effectively participating in our decision-making process.

As a non-profit, all decisions are made either by the Board of Directors, or to a lesser degree by the Executive Director and the Heads of all the Departments.

However, The Transportation Coordinator is part of three Transportation based committees; one based in the home county of St. Mary's, the Regional Transportation Coordination Committee and the Transportation Advisory Committee. All three committees have representations from agencies that provide services to people with low incomes, seniors and minorities. The Transportation Advisory Committee meetings are held at the Local Transit company, STS, and are open to members of the public

Participating Agencies include:

- St. Mary's Department of Aging & Human Services (Senior Rides)
- St. Mary's Adult Medical Day Care

- St. Mary's Co. Dept. of Social Services
- Southern Maryland Center for Independent Living
- St. Mary's Nursing Center
- St. Mary's Health Dept.
- Cedar Lane Apartments
- Spring Dell Center
- Charles County Nursing and Rehabilitation Center
- Veteran based and church-based representatives
- Abilities Network
- Adult Day Care of Calvert County
- Arc of Southern Maryland
- Bay Community Support Services
- Calvert County Health Department
- Calvert County Public Transportation (CCPT)
- Catholic Charities
- Charles County Freedom Landing, Inc.
- Charlotte Hall Veterans Home
- Friendly Health Services
- Greater Baden Medical Services, Inc.
- Lifestyles of Maryland Foundation, Inc. (Senior Rides)
- Maryland's Commitment to Veterans
- Partners In Care (Senior Rides)
- Pathways, Inc.
- Southern Maryland Center for Independent Living
- New Horizons Supported Services, Inc. (NHSSI)
- Patriot Medical Transport System, LLC
- Southern Maryland Community Network (SMCN)
- Southern Maryland Tri-County Community Action Committee, Inc. (SMTCCAC)
- The Center for Life Enrichment

March 2017 – The TAC committee of St. Mary's Transit in partnership with the MPO Planner of the St. Mary's Department of Land Use & Growth Management have created a survey to seek the needs of transportation in St. Mary's County. Members of the committee take turns riding buses and collecting information from users of local transit services. This information will hopefully give us a better understanding where and when services are needed and where we should focus our Coordination efforts.

Language Assistance Plan (LAP) Plan

Introduction and Legal Basis

LEP is a term that defines any individual not proficient in the use of the English language. The establishment and operation of an LEP program meets objectives set forth in Title VI of the civil Rights Act and Executive Order 13116, Improving Access to Services for Persons with Limited English Proficiency (LEP). This Executive Order requires federal agencies receiving financial assistance to address the needs of non-English speaking persons. The Executive Order also establishes compliance standards to ensure that the programs and activities that are provided by a transportation provider in English are accessible to LEP communities.

Based on census data gathered as required, the data supports that The Center for Life Enrichment is not required to develop a written LEP Plan. Based on American Community Survey (ACS) Census data [2011-2015] and updated February 2017 for MDOT, the Center for Life Enrichment has evaluated data to determine the extent of need for translation services of its vital documents and materials.

LEP persons can be a significant market for public transit, and reaching out to these individuals can help increase their utilization of transit. Therefore, it also makes good business sense to translate vital information into languages that the larger LEP populations in the community can understand.

Assessment of Needs and Resources

The need and resources for LEP language assistance were determined through a four-factor analysis as recommended by FTA guidance.

Factor One: Assessment of the number and proportion of LEP Persons likely to be served or encountered in the eligible service population.

The Center for Life Enrichment has reviewed the 2008-2012 American Community Survey 5-year estimates, from the U.S. Census Bureau, for the number of individuals in its tri-county area that have limited English proficiency [LEP]. The following are our findings:

Charles County – 143,532 residents 5 years old and older – 2.21% state they speak English “less than very well”

Calvert County – 85,049 residents 5 years old and older – 1.35% state they speak English “less than very well”

St. Mary’s County – 102,192 residents 5 years old and older – 2.14% state they speak English “less than very well”

With this data, it is noted that within the tri-county area of the Center for Life Enrichment there is a low number of residents, in the service area, with LEP.

Factor Two: Assessment of frequency with which LEP individuals meet the Transit services or system

The Center for Life Enrichment has reviewed and continues to monitor the number of potential LEP clients. The facility monitors clients seeking information relevant to the following:

- DDA and DORS Consumers that have LEP to determine additional services needed
- agency satisfaction surveys
- telephone inquiries relevant to services we provide

The Center for Life Enrichment will continue monitoring the growth in the tri-county service area and any increases in the number of LEP people.

Factor Three: Assessment of nature and importance of the transit services to the LEP population

The Center for Life Enrichment is a private non-profit providing a variety of services for individuals with mental and physical disabilities and licensed by the Department of Health and Mental Hygiene. Our mission is to provide programs and support services that will increase the vocational and personal potential of individuals with disabilities.

Our transportation program is utilized primarily by our Consumers for day habilitation, vocational, recreational and medical services. It is occasionally utilized by Special Olympics of St. Mary's County to assist the transportation needs of athletes with disabilities.

Factor Four: Assessment of the resources available to the Agency and costs

The Center for Life Enrichment has an excellent rapport with the College of Southern Maryland for Services for consumers who need any type of communication service, i.e. sign language, language interpretation, etc. The agency also has staff who are fluent in other languages.

There is no cost for these services.

Based on demographic analysis and from the internal data gathered, in response to Factor Two, The Center for Life Enrichment determines that at this time it does not have to provide additional services.

In completion of the Four Factor analysis, it is determined that the Center for Life Enrichment does not have to provide a written Language Access Plan, which is permissible under FTA Circular 4702.1A. The Center for Life Enrichment does, however, understand that it must continue to monitor the increase in LEP Consumers and educate staff on the increased need of LEP Consumers.

Language Access Plan

I. Introduction

The Center for Life Enrichment has prepared this Language Access Plan (“LAP” or “Plan”), which defines the actions to be taken by The Center for Life Enrichment to ensure meaningful access to agency services, programs and activities on the part of persons who have limited English proficiency. The Center for Life Enrichment will review and update this LAP in order to ensure continued responsiveness to community needs. This Plan meets objectives set forth in Title VI of the Civil Rights Act and Executive Order 13116, Improving Access to Services for Persons with Limited English Proficiency (LEP).

II. Purpose

The purpose of this plan is to ensure clients of the Center for Life Enrichment have meaningful access to services, programs and activities although they may be limited in their English language proficiency.

The Center for Life Enrichment is committed to this Language Access Plan as the appropriate response to meeting our clients’ needs.

Consistent with the guidance of objectives set forth in Title VI of the Civil Rights Act and Executive Order 13116, Improving Access to Services for Persons with Limited English Proficiency (LEP), a Limited English Proficient (“LEP”) person is someone who is not able to speak, read, write or understand the English language at a level that allows him/her to interact effectively with Center for Life Enrichment staff. A client maintains the right to self-identify as a LEP person.

III. Agency Description

Mission Statement

The mission of The Center for Life Enrichment is to provide programs and support services that will increase the vocational and personal potential of individuals with disabilities.

Our goal is to provide these services in a unique and individualized manner for each of our clients, helping to improve their overall quality of life in the form of increased independence, integration into the workforce, and the opportunity for social interaction with others.

The Center for Life Enrichment (previously St. Mary’s County Developmental Center) has over a forty-year history of providing pre-vocational, vocational, socialization, recreation and advocacy services to adult individuals with disabilities in St. Mary’s County. Our licensing or auditing entities include, United States Department of Labor, Maryland Department of Health and Mental Hygiene, Maryland Department of Educational and National Industries for the Severely Handicapped.

The Center has three training facilities located in St. Mary’s County

- Training Center, prevocational and day habilitation programs at our main facility located in Hollywood, MD.
- Training Center and Thrift Store (Vintage Values II) located in Lexington Park, MD.
- Training Center and Thrift Store (Vintage Values) located in Leonardtown, MD.

And two training facilities in Calvert County

- Training Center, prevocational and day habilitation programs in Prince Frederick, MD
- Training Center and Thrift Store (Vintage Values III) located on Route 4 in Prince Frederick, MD.

In addition to the 267 individuals with developmental disabilities, funded by the Department of Health and Mental Hygiene, the center also provides job development, job coaching and work adjustment training for the Maryland Department of Education - Division of Rehabilitation Services and employs disabled individuals to fulfill contract obligations.

Work training is provided to consumers in the areas of custodial maintenance, shelf stocking, retail sales, commercial domestic services and meter reading. In conjunction with vocational training the center also provides training in self-help skills. The Supported Employment Program develops employment opportunities where disabled individuals supported by the Center, are hired by local businesses. Listed below are highlights of programs and opportunities provided by The Center for Life Enrichment:

The Supported Employment Program

Designed to provide an employment support system with the primary goal of individual job placement and continued support in the community. Our facility is the only program in the county which provides such a range of support to people with disabilities.

Jobs in the Competitive Market

The Center presently assists disabled individuals in obtaining and then retaining community-based employment. Positions held include food service, custodial, housekeeping, data entry, laundry and shelf stocking. In the past year TCLE assisted 40 disabled individuals in finding or maintaining competitive employment or finding volunteer opportunities.

Utilizing the center's extensive database, individuals are assisted with locating and obtaining desired positions. The Center for Life Enrichment then provides one-to-one training by a job coach, beginning intensely and fading as the person becomes independent. This training is goal-orientated and includes participation in seminars and Employment Club gatherings.

Service Jobs in the Community

The Center provides a variety of enclave employment opportunities. (An enclave is composed of two or more people working with a supervisor). All opportunities are paid work.

Vintage Values Thrift Stores/Training Facilities

Volunteer Opportunities

The Center for Life Enrichment also provides job coaching and transportation for individuals with disabilities to various volunteer opportunities in our local community. These opportunities include the hospital, health department, meals on wheels, animal shelter, County facilities and other areas.

Day Habilitation

The Center's Day Habilitation program provides a wide range of services for adults with disabilities. Individuals can access opportunities for education and self-help, and for the development of interpersonal, vocational and employment skills. Communication, socialization, health and personal growth are the foundations of the program. Individuals may request and receive:

- Physical Therapy
- Occupational Therapy
- Speech Therapy
- Individual Counseling by a licensed psychologist or licensed therapist

Nursing Delegation

Family and Individual Support Services

Individual support services provide the opportunity for people with disabilities to be supported in their homes, with a wide range of natural and community-based services, so that everyone can function as independently as possible. This service is created to be flexible and meet the needs of those individuals requesting the service. Individuals may request and receive:

- Training and support for self-advocacy
- Therapeutic services
- Individual and family counseling
- Respite services
- Transportation assistance
- Community integration services
- Maximize the individual's independence in the community
- Supports necessary to maintain family unity

Peer Activities and Learning Services

Peer Activities and Learning Skills (PALS) is a program that provides disabled individuals in the community who need support services an opportunity to participate in an activity program. This program provides five evenings per week of community sponsored activities with transportation assistance to and from each event. Events include social events, dances, movies, dinner, shopping and living skills such as cooking, money skills, and writing skills. The program serves

up to 62 individuals with the opportunity to utilize 25 to 30 hours of support each week.

Transportation

Due to the limited availability of public transportation, in both St. Mary's and Calvert counties, The Center for Life Enrichment must provide transportation services for all Center programs.

To carry out this service, the Center maintains a fleet of 67 vehicles, with 16 vehicles being wheelchair accessible.

Last year TCLE vehicles traveled over eight hundred thousand miles. Agency Drivers are not required to have CDL licensing due to the size of our vehicles, however, bus drivers are required to pass a DOT physical, maintain a good driving record, pass random drug screening, complete all State mandated and safety training. All Center staff receive training in operating wheelchair equipment, driving and proper inspection of Agency vehicles.

Buses acquired through the 5310 grants are utilized to provide transport from home to employment and Center programming. During the midday they are utilized to take Consumers to paid and volunteer employment opportunities.

In 2016, these eleven [11] buses transported Consumers 269,350 miles, making 44,816 trips and were on the road 19,146 hours. Transportation is primarily offered to Consumers of the Center.

Requests for transportation have been submitted by STS [the local transit service], the Department of Aging, the Department of Social Services and the St. Mary's Health Department from Individuals with disabilities. These needs are accepted and provided when we are able to work the individual's needs into one of the fixed routes.

Each month a request for a vehicle is approved for transport of athletes to and from Special Olympics events.

The Executive Director donates use of a Bus and Driver for Veteran events. This includes the annual Veterans Day parade held in Leonardtown and dubbed the second largest in the Country. And three times a year for V4V [vacation for Vets]; a program in St. Mary's County providing recovering Veterans and their family a free weekend in the country.

Agency Language Access Coordinator

Taylor Brown, Programming Director
25089 Three Notch Road, P. O. Box 610
Hollywood, MD 20636
301-373-8100, *16
freemana@tcle.org

Agency Language Access Needs Assessment

- 1) The Center for Life Enrichment has completed an assessment on the current individuals utilizing services and an assessment on future needs:

- a) Currently, TCLE does not have any individuals who are non-English speaking – all communication is either verbal or thru written documents.
 - b) All potential individuals who may require services in the future will go through an intake process that addresses needs and possible barriers. If language barriers are present, the intake process will include implementation strategies on alleviating the communication barrier. This may include, but not limited to, purchasing interpreter services, developing language communication books and seeking additional staff.
 - c) TCLE understands the importance of providing services to the overall population and will obtain the necessary support to address all barriers, including language. With population changes TCLE will contract out with Interpreter Services. Interpreter Services may include, but not limited to, identifying specific language barriers which would include sign language.
 - d) Resources used would be identified through existing state funds, or in some cases developing contractual agreements.
- 2) Language Makeup of Client Population:
- a) There is currently only one client that speaks a second language [Korean], however English is her primary language
- 3) Points of Contact between Agency and Client Population:
- a) Resource Coordination, St. Mary's County Health Department; 301-475-4389

Language Resources Assessment

- 1) Identification of existing staff who are linguistically, culturally, and technically able to deliver services in a language other than English and/or to serve as interpreters:
 - a) Two of our current staff can deliver services in German; one at the Calvert Facility and one at the Hollywood Facility
- 2) Community-based resources available to be deployed to assist agency in meeting language access needs:
 - a) Department of Mental Health and Hygiene and the College of Southern Maryland

Language Service Protocols

- 1) Which language services are required to implement the Language Access Plan:
 - a) At this time no language services are needed.
- 2) All potential individuals who may require services in the future will go through an intake process that addresses needs and possible barriers. If language barriers are present, the intake process will include implementation strategies on alleviating the communication barrier.

Vital Document Translation

Document translation would be sent to SMIS services for translations- TCLE would establish contractual services through an area school system which will offer instructors as consultants

Stakeholder Consultations

Annually the Personnel Manual and Policies are reviewed with our stakeholders' areas of concern which address language barriers are addressed.

Staff Training

Any vehicle providing services to individuals not able to speak the English language will be provided documentation in the language of need. Signs will be addressed in the same manner.

Notice to Public

Through the intake process, the individual will be notified of all resources attainable for their needs.

Complaints

The Center for Life Enrichment is committed to ensuring that no person is excluded from participating in or denied the benefits of its transportation services based on race, color or national origin, as protected by Title VI in the Federal Transit Administration (FTA) Circular 4702.1B. For additional information on The Center for Life Enrichment's nondiscrimination policies and procedures, or to file a complaint, please visit the website at www.tcle.org or contact Tiffany Lawrence, Human Resources Director, P. O. Box 610, Hollywood, MD 20636.

Randall Ferguson

RANDALL FERGUSON, EXECUTIVE DIRECTOR

10-9-29025

DATE

You may file a complaint with the Agency Title VI Manager if you believe you have been denied the benefits of this Plan. You must file your written complaint within 30 days of the alleged denial. Submit the written complaint to:

Felecia Sorrells
Human Resources Director
The Center for Life Enrichment
P. O. Box 610
Hollywood, MD 20636

Appendices

Confirmation Letter – Internal Revenue code 501(c)(3)

[Read the accessible transcript of the Confirmation Letter.](#)

Internal Revenue Service

Department of the Treasury
P. O. Box 2500
Cincinnati, OH 45201

Date: April 2, 2007

Person to Contact:
Stephanie Swartzbaugh 31-07594
Customer Service Specialist
Toll Free Telephone Number:
877-829-5500
Federal Identification Number:
52-0799313

CENTER FOR LIFE ENRICHMENT INC
PO BOX 610
HOLLYWOOD MD 20636-0610

Dear Sir or Madam:

This is in response to your request of April 2, 2007, regarding your organization's tax-exempt status.

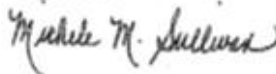
In January 1965 we issued a determination letter that recognized your organization as exempt from federal income tax. Our records indicate that your organization is currently exempt under section 501(c)(3) of the Internal Revenue Code.

Our records indicate that your organization is also classified as a public charity under sections 509(a)(1) and 170(b)(1)(A)(vi) of the Internal Revenue Code.

Our records indicate that contributions to your organization are deductible under section 170 of the Code, and that you are qualified to receive tax deductible bequests, devises, transfers or gifts under section 2055, 2106 or 2522 of the Internal Revenue Code.

If you have any questions, please call us at the telephone number shown in the heading of this letter.

Sincerely,



Michele M. Sullivan, Oper. Mgr.
Accounts Management Operations 1

Title VI Public Notice

Title VI of the Civil Rights Act of 1964 prohibits discrimination based on race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that "no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance" (42 U.S.C. Section 2000d).

The Center for Life Enrichment is committed to ensuring that no person is excluded from participation in or denied the benefits of its transportation services based on race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1B. If you need more information or feel you are being denied participation in or being denied benefits of the transit services provided by The Center for Life Enrichment, or otherwise being discriminated against because of your race, color, national origin, gender, age, or disability, our contact information is:

Felecia Sorrells
Human Resource Director
The Center for Life Enrichment
P. O. Box 610
25089 Three Notch Road
Hollywood, Maryland 20636
301-373-8100, *13
sorrellsfs@tcle.org

Title VI Complaint Form



Section I

Name: _____

Address: _____

Home #: _____

Work #: _____

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 questions, 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, as well as the names and contact information of any witnesses. If more space is needed, please use the back of the form.

Section IV

Have you previously filed a Title VI complaint with this agency?

Yes

No

Have you filed this complaint with any other Federal, State, or local agency, or with a Federal or State court?

Yes

No

If yes, check all that apply

Federal Agency

Federal Court

State Agency

State Court

Local Agency

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

Name: _____

Title: _____

Agency: _____

Address: _____

Telephone: _____

Section VI

Name of Agency complaint is against: _____

Contact Person: _____

Title: _____

Telephone Number: _____

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

Signature and date required below

Signature

Date

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

The Center for Life Enrichment
Title VI Manager
25089 Three Notch Road
P. O. Box 610
Hollywood, MD 20636

List of Investigations, Lawsuits and Complaints

Date (Month, Day, Year)	Investigation, Lawsuit or Complaint	Summary (include basis of complaint: race, color or national origin)	Status	Action(s) taken

Minority representation on Committees by Race

Title 49 CFR Section 21.5(b)(1)(vii) states that a recipient may not, on the grounds of race, color, or national origin, “deny a person the opportunity to participate as a member of a planning, advisory, or similar body which is an integral part of the program.”

The Center for Life Enrichment has a representative participate in transit-related, non-elected planning boards, advisory councils or committees, and participates in the Transportation Advisory committee for St. Mary’s County as requested by The County Commissioners.

Committee	Board of Directors	% of BOD
Black or African American	1	14%
White / Caucasian	6	86%
Latino / Hispanic		
American Indian or Alaska Native		
Asian		
Native Hawaiian or other Pacific Islander		
Other		
Totals	7	100%