Federal Transit Administration

Title VI Program

Panhandle Developmental Disabilities Services

2026

Reviewed and Approved by Bruce D Meredith

County Commissioners
Panhandle Developmental Disabilities Services

4-9-26

Date

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Non-Discrimination Statement of Policy

Under Title VI of the Civil Rights Act of 1964 and related statutes, the Panhandle Developmental Disabilities Services is committed to ensuring that no person shall, on the grounds of race, color, or national origin, be excluded from participation in, denied the benefits or services of, or be otherwise subjected to discrimination in all programs, services, or activities administered by the Panhandle Developmental Disabilities Services.

Bruce D Meredith

Chair
County Commissioners

4-9-26

Date

All entities who receive Federal Transit Administration (FTA) grant dollars either directly from the FTA or through the Nebraska Department of Transportation (NDOT) are subject to the Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the U.S. Department of Transportation's implementing regulations. This manual provides technical assistance on Title VI compliance requirements.

1 Introduction and Overview

1.1 Plan Statement

Panhandle Developmental Disabilities Services operates a demand response transit program serving individuals with developmental and intellectual disabilities in the 11 counties included in the Nebraska Panhandle region. As a condition of receiving federal financial assistance to operate these services, the agency ensures that its programs, policies, and activities comply with Title VI of the Civil Rights Act of 1964. The following program details how Panhandle Developmental Disabilities Services meets the Title VI requirements set forth in the Federal Transit Administration (FTA) Circular 4702.1B.

Panhandle Developmental Disabilities Services receives federal FTA funding through the Nebraska Department of Transportation (NDOT) Transit Section. NDOT administers Panhandle Developmental Disabilities Services FTA transit service funding and provides all Title VI program oversight for Panhandle Developmental Disabilities Services.

1.2 Policy

Section 601 under Title VI of the Civil Rights Act of 1964 states the following:

"No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefit of, or be subjected to discrimination under any program or activity receiving Federal financial assistance."

Panhandle Developmental Disabilities Services is committed to ensuring that no person, on the basis of race, color, or national origin, shall be excluded from participation in or subjected to discrimination under its programs or services, or be denied the benefits of the level and quality of transit services provided by the agency's employees, affiliates, and contractors.

1.3 Authorizing Legislation

Most federal transit laws are codified at Title 49 U.S.C. Chapter 53. Authorizing legislation is substantive legislation enacted by Congress that establishes or continues the operation of a federal program or agency. FTA's most recent authorizing legislation is entitled the *Bipartisan Infrastructure Law*, signed into law on November 15, 2021.

1.4 How to Contact FTA and Panhandle Developmental Disabilities Services

For more information regarding Panhandle Developmental Disabilities Services's Title VI Program, please contact the agency at:

Panhandle Developmental Disabilities Services
Attn: Robert C. Davis, Executive Director
P.O. Box 1327
Scottsbluff, NE 69361
308-635-3444
rdavis@regohd.org

FTA may be contacted at:

Federal Transit Administration
Region 7
901 Locust Street, Suite 404
Kansas City, MO 64106
Phone: 816-329-3920

or

Federal Transit Administration
Office of Civil Rights
Attention: Title VI coordinator
East Building, 5th Floor-TCR
1200 New Jersey Ave., SE,
Washington, D.C. 20590

NDOT may be contacted at:

Nebraska Department of Transportation
Kimberly Baker, Civil Rights Compliance Manager
1500 Nebraska Parkway
P.O. Box 94759
Lincoln, NE 68509-4759
402-479-4544
ndot.civilrights@nebraska.gov

1.5 Governing Body

The governing body of Panhandle Developmental Disabilities Services consists of 11 County Commissioners representing each county in the Nebraska Panhandle region.

1.6 FTA Circular 4702.1B

The Panhandle Developmental Disabilities Services Title VI Plan has been developed to address FTA's Title VI requirements and oversight responsibilities. The plan follows the guidelines set forth in FTA Circular 4702.1B.

2 General Reporting Requirements

2.1 Assurances

Panhandle Developmental Disabilities Services annually submits its Certifications and Assurances to NDOT. NDOT collects the Panhandle Developmental Disabilities Services Title VI Assurances prior to passing through FTA funds.

2.2 Prepare and Submit a Title VI Program

Panhandle Developmental Disabilities Services submitted its previous Title VI Program to the NDOT Civil Rights Office in April 2023. The current Title VI Program is intended to fulfill submission requirements for the 2026–2029 reporting period.

The County Commissioners will review and approve the current Title VI Program prior to its submission to NDOT. This approval is documented via the signature line on the cover of this Title VI

Program, and subsequent documentation will be submitted with the Panhandle Developmental Disabilities Services Title VI Program. The effective date of the Program will be the date of the resolution.

Panhandle Developmental Disabilities Services will submit its Title VI Program to the NDOT Civil Rights Office for review and approval.

2.3 Title VI Notice

Panhandle Developmental Disabilities Services complies with Title VI and notifies the public of the protections against discrimination afforded to them by Title VI. The notice is posted in the following public locations: (a) on the Panhandle Developmental Disabilities Services website (https://regohd.org/resources/); (b) at a visible public location at the Panhandle Developmental Disabilities Services main office; and (c) at a visible location in transit vehicles. This notice has been translated in accordance with NDOT's limited English proficiency (LEP) plan.[1] See **Appendix A** for a copy of the Panhandle Developmental Disabilities Services Title VI notice to the public.

2.4 Title VI Complaint Procedure and Complaint Form

Panhandle Developmental Disabilities Services has adopted the NDOT procedures and forms for investigating and tracking Title VI complaints of discrimination. The following complaint procedures are patterned after the FTA's requirements and guidance.

All FTA-related Title VI complaints filed against Panhandle Developmental Disabilities Services are forwarded to both the NDOT Civil Rights Compliance Manager and the NDOT Transit Program Manager in the Local Assistance Division for processing, in coordination with the NDOT Civil Rights Office. Panhandle Developmental Disabilities Services will maintain a log of all complaints received (see **Appendix D**), including the following:

- The date the complaint was filed
- A description of the complaint
- Dates of all significant actions taken
- All correspondence with the complainant or respondent

NDOT will review all complaints for programs and activities receiving FTA financial assistance.

The Panhandle Developmental Disabilities Services Title VI complaint procedures and forms are available to members of the public at https://regohd.org/resources/ or by request. The Title VI Complaint Form has been translated in accordance with NDOT's LEP plan and is provided in **Appendix B**.

The following section describes the Panhandle Developmental Disabilities Services Title VI complaint procedures.

[1] https://dot.nebraska.gov/media/rngflsav/ndot-limited-english-proficiency-plan.pdf

2.4.1 Filing a Transit-Related Complaint with Panhandle Developmental Disabilities Services

Persons Eligible to File

Any person who believes they, or any program beneficiary, has been subjected to unequal treatment or discrimination in their receipt of transit benefits and/or services on the basis of race, color, or national origin may file a Title VI complaint with Panhandle Developmental Disabilities Services. Complaints may be filed directly by the affected individual(s) or by a representative on their behalf.

Complaint Substance and Format

To file a complaint with Panhandle Developmental Disabilities Services, complainants should complete and submit the agency's Title VI Complaint Form or submit a written letter containing the following information:

- The name(s) of the persons(s) filing the complaint (the complainant)
- Mailing address and phone number of the complainant(s)
- Name of the person(s) or entity alleged to have engaged in discrimination
- Date of the incident
- A detailed description of the incident
- An explanation of how the incident involved discrimination based on race, color, or national origin
- The names, mailing addresses, and phone numbers of witnesses or third parties to the incident
- Any additional information relevant to the complaint

A complaint may be filed on behalf of another person with their expressed written consent. The Title VI Complaint Form or letter of complaint must be signed by the complainant or by their authorized representative.

Time Frame for Filing Complaints

Complaints must be received no more than 180 calendar days after the alleged incident and must involve allegations of discrimination on the basis of race, color, or national origin to be investigated as an unlawful discriminatory practice under Title VI. FTA may grant an extension.

If Panhandle Developmental Disabilities Services receives a complaint, Panhandle Developmental Disabilities Services will submit the complaint to the NDOT Civil Rights Office for review.

After a complaint is received, an NDOT investigator will determine whether it meets the criteria and whether NDOT has jurisdiction. The complainant will receive an acknowledgement letter by mail about whether the investigation will proceed.

Processing and Investigating Complaints

NDOT strives to complete investigations within 90 days. At any time during the investigation, the investigator may request additional information to assist in the investigation of the incident. The complainant will be given 15 business days to respond to the request for additional information. If NDOT is not contacted by the complainant or does not receive the additional information within 15

business days, NDOT can administratively close the case. The case can be administratively closed if the complainant no longer wants to pursue the case.

Closing a Complaint

After NDOT reviews the complaint, one of two letters will be issued to the complainant: a closure letter or a letter of finding. 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 findings 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. Complainants have 30 days to appeal the findings of the investigation.

Contact Information

Complaint forms are available on the Panhandle Developmental Disabilities Services website at https://regohd.org/resources/. For additional questions regarding the Panhandle Developmental Disabilities Services Title VI complaint procedures or Title VI Program, individuals may contact Panhandle Developmental Disabilities Services at the contact information provided in **Section 1.4**. For more information on NDOT's Title VI complaints procedure or Title VI Program, or for assistance placing a complaint in writing or for language assistance, contact the NDOT Civil Rights Office using the information in **Section 1.4**.

2.4.2 Panhandle Developmental Disabilities Services Title VI Complaint Form

See **Appendix B** for a copy of the Panhandle Developmental Disabilities Services Title VI Discrimination Complaint Form.

2.5 List of Title VI Investigations, Complaints, and Lawsuits

As of the current Title VI Program submission, no transit-related complaints specific to Title VI were filed; therefore, there are no incidents to track or report. Panhandle Developmental Disabilities Services would use the Complaint and Lawsuit Tracking Form in **Appendix D** to conduct an investigation, receive a complaint, or file a lawsuit alleging discrimination on the basis of race, color, or national origin. Panhandle Developmental Disabilities Services will report all Title VI complaints to the NDOT Civil Rights Office and FTA.

2.6 Inclusive Public Participation

The Panhandle Developmental Disabilities Services public involvement strategy is intended to promote awareness and provide ample opportunity for the public to participate in the Panhandle Developmental Disabilities Services transportation decision-making surrounding projects, fares and/or service charges, and application for federal operating assistance. Examples include the following:

- Ensuring the timely dissemination of information to the public
- Considering the input and encouraging the participation of underserved groups in the Panhandle Developmental Disabilities Services transportation decision-making process
- Granting timely public notice and an adequate review period through this process
- Facilitating adequate public review of major project revisions
- Granting the opportunity for the review of proposed and final plans
- Encouraging and documenting public comment

For these purposes, Panhandle Developmental Disabilities Services will announce and hold a public hearing in the event of a fare increase, major change in service, or capital construction project. Additionally, the Panhandle Developmental Disabilities Services will provide adequate public notice in the event of a vehicle purchase or when submitting an application for state or federal operating assistance funds with no major service changes or fare increases.

For the purpose of definition, a major change or reduction service will include a reduction in total system vehicle-hours of 10 percent or more, the elimination of service in an area with a population of 2,000 or more, the elimination of service on one or more days of the week, or a change in the type of transit service in an area with a population of 2,000 or more. A fare increase will include an increase in single ride fare for any transit service including other fare categories or a decrease in the discount(s) offered for fare categories.

Public hearings will be advertised in a newspaper of general circulation in the geographic area the project will serve at least 15 calendar days in advance of the public hearing, and the comment period will extend 15 days following the public hearing. Notice of hearings will include a concise description of the proposed project and will advertise the availability of translated copies of said hearing notice and/or other publicly released meeting documents in accordance with the Panhandle Developmental Disabilities Services Language Assistance Plan (LAP). Hearings will be held in accessible locations and at times convenient for public attendance.

Written or verbal comments from the public will be accepted during and for 15 days following the public hearing. These comments will be reviewed as part of the agency's decision-making process surrounding transportation projects.

An agency staff member will record and prepare formal minutes of the public hearing. These minutes will be available to the public on request. Translations of these minutes, as well as other publicly released meeting documents (e.g., announcements, surveys, comment cards), will be made available to members of the public on request. The availability of translated minutes and other public documents will be advertised on the agency's public hearing notice.

2.6.1 Summary of Past Outreach Efforts

Because Panhandle Developmental Disabilities Services provides services in addition to transportation, it engages in public outreach strategies that differ from traditional promotional activities for public transit, including partnerships with local agencies and participation in community events. However, Panhandle Developmental Disabilities Services will continue to follow the public participation strategy for requests for operating assistance or acquisitions of new technologies, services, or equipment. Reasonable steps will be taken to accommodate LEP persons encountered as a result of this process.

Panhandle Developmental Disabilities Services personnel report no contact with LEP clients – an estimate supported by the LAP four-factor analysis. The agency's current public participation strategy has been reviewed and revised to provide opportunities for meaningful access and participation by LEP persons.

2.7 Providing Meaningful Access to LEP Persons

Panhandle Developmental Disabilities Services does not provide transportation to the general public; transportation is provided exclusively to the eligible individuals with developmental and intellectual disabilities residing in the 11 counties in the Nebraska Panhandle region. Panhandle Developmental Disabilities Services personnel report that contact with LEP persons is rare, with no LEP persons currently in contact with the agency. However, the following analysis was completed to inform a LAP

that considers the needs of LEP persons who could potentially be encountered by the agency as it administers its programs in the service area.

To facilitate this analysis, 2020–2024 American Community Survey data were analyzed for the agency's service area to inform the four-factor analysis. The data show that the number and proportion of LEP persons in the service area is low, with approximately 92.7 percent of the population estimated to speak only English. These results and the Panhandle Developmental Disabilities Services four-factor analysis can be found in **Appendix C**.

2.7.1 Service Area Profile Conclusions

Based on the four-factor analysis, the number and proportion of non-English-speaking LEP persons in the Panhandle Developmental Disabilities Services area is low, with a very low number and proportion of Spanish-speaking LEP persons in the Panhandle Developmental Disabilities Services area and no other non-English language groups exceeding the Safe Harbor Threshold of 1,000 or more LEP persons or greater than 5 percent of the service area population. However, if staff encounter LEP individuals, employees are trained to respond appropriately and provide meaningful access to services using language assistance resources, as detailed in the LAP.

2.7.2 Language Assistance Plan

Panhandle Developmental Disabilities Services has access to language assistance resources through publicly available translation applications, and there are Spanish-speaking staff employed at the facility to provide translations as necessary. If Panhandle Developmental Disabilities Services holds a public hearing, distributed meeting documents, including meeting minutes, can be translated using these resources. These services can be used whenever in-person or over-the-phone interpretation is required to assist riders. The agency will also take reasonable steps to support LEP individuals who may choose to access its programs and services in the future.

Using NDOT resources, Panhandle Developmental Disabilities Services' Title VI Notice to the Public, Discrimination Complaint Form, and Discrimination Complaint Procedures Form have been translated into Spanish for public distribution and for posting on the agency's website.

Additionally, "I Speak" cards will be available at the agency's main office. These cards allow LEP individuals to quickly identify their spoken language when it cannot be easily determined by staff. This tool will help Panhandle Developmental Disabilities Services identify language assistance needs as they arise and ensure appropriate support is provided.

2.7.3 Monitoring and Updating the Panhandle Developmental Disabilities Services LAP

Panhandle Developmental Disabilities Services understands that language needs will change as the service area population changes. Panhandle Developmental Disabilities Services will revisit the LAP every 3 years and make appropriate changes. Updates may include the following:

- The number of documented LEP person contacts encountered since the last update
- Description of how the needs of LEP persons have been addressed
- Determination of the current LEP population in the agency service area
- Determination of whether the need for language assistance has changed
- Determination of whether local language assistance has been effective and sufficient at meeting needs

- Determination of whether the agency's available outreach resources are sufficient to supply necessary language assistance
- Determination of whether complaints have been received concerning the agency's failure to meet the needs of LEP persons

2.7.4 Employee Training

The Panhandle Developmental Disabilities Services personnel are required to review the current Title VI Program document and sign a written statement declaring their understanding of their obligation to provide service regardless of race, color, or national origin.

Necessary personnel will be familiar with the agency's procedures for handling a potential Title VI complaint.

Additional resources for employee training include a Title VI training course hosted by NDOT and ongoing Title VI assistance and oversight provided by the NDOT Civil Rights Office.

2.8 Planning and Advisory Bodies

Panhandle Developmental Disabilities Services maintains a Planning Advisory Board to provide guidance on transportation planning activities and ensure compliance with Title VI requirements. The responsibilities of the Planning Advisory Board include the following:

- Review and advise on transportation plans, programs, and policies
- Ensure planning processes are inclusive and provide meaningful opportunities for minority and low-income populations
- Monitor compliance with Title VI and related nondiscrimination requirements

The Planning Advisory Board consists of members who represent the diversity of the service area. The subrecipient tracks and reports the composition of the board by race to demonstrate compliance with Title VI.

Panhandle Developmental Disabilities Services Planning Advisory Board – Racial Breakdown

Total Members	Hispanic	White
10	1	1

Interested members are appointed by other advisory board members or staff members. The process is designed to ensure equitable representation and transparency.

2.9 Equity Analysis to Determine Site or Location of Facilities

Panhandle Developmental Disabilities Services will complete a Title VI equity analysis during the planning stage for construction projects using FTA funds with regard to where a project is located or sited and to compare the impact of siting alternatives. The purpose of the equity analysis will be to ensure that the determination of the site or location of facilities was made without denying anyone the benefits of the federally funded program or subjecting anyone to discrimination on the basis of race, color, or national origin. Copies of subsequent equity analyses will be included in NDOT's 2029 Title VI Program submission. Panhandle Developmental Disabilities Services will complete an equity analysis

for projects related to facilities, including storage facilities, maintenance facilities, and operations centers. NDOT follows the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970.

As of the publication of this Title VI Program Plan, no new location or existing facility upgrade is programmed for the time period of this plan. If one is programmed after approval, it will be amended into this document as an appendix.

3 Requests for Additional Information

Panhandle Developmental Disabilities Services will fully cooperate with any FTA investigation of discrimination complaints to the extent required by Title VI regulations of FTA Circular 4702.1B.

Appendix A

Panhandle Developmental Disabilities Services Title VI Notice

Title VI Notice to the Public

Panhandle Developmental Disabilities Services operates its programs and services without regard to race, color, or national origin in accordance with Title VI of the Civil Rights Act. Any person who believes they have been aggrieved by an unlawful discriminatory practice under Title VI may file a complaint of discrimination by completing and submitting the agency's Title VI Discrimination Complaint Form. This form can be downloaded on the subrecipient's website at https://regohd.org/resources/ or requested by contacting Robert C. Davis, Executive Director, at the address provided below.

To request more information on the agency's Title VI obligations or to obtain a detailed description of the agency's Title VI discrimination complaint procedures, please visit the agency website or contact the agency using the information provided. A telephone interpreter can be provided to assist persons of limited English proficiency.

Questions about Title VI? Please contact:

¿Preguntas sobre el Título VI? Por favor comuníquese con:

Subrecipient Organization: Panhandle Developmental Disabilities Services

Attn: Robert C. Davis, Executive Director

Mailing Address: P.O. Box 1327
City, State, ZIP: Scottsbluff, NE 69361

Phone: 308-635-3444

Email: rdavis@regohd.org

Website: https://regohd.org/resources/

Notificación al Público sobre el Título VI

Panhandle Developmental Disabilities Services opera sus programas y servicios sin tomar en cuenta raza, color, u origen nacionalidad de conformidad con el Título VI del Acta de Derechos Civiles. Cualquier persona que crea que ha sido agraviada por cualquier práctica discriminatoria ilegal bajo el Título VI puede presentar una queja de discriminación al completar y enviar el Formulario de Queja de Discriminación de Título VI de la agencia. Este formulario se puede descargar del sitio web del subreceptor en https://regohd.org/resources/ o solicitarse comunicándose con Robert C. Davis, Executive Director, a la dirección proporcionada arriba.

Para solicitar mas información sobre las obligaciones de Título VI de la agencia o para obtener una descripción detallada del procedimiento de Quejas de Discriminación del Título VI, favor de visitar la pagina de la agencia o contactar la agencia a la dirección proporcionada arriba. Un interprete telefónico está disponible para asistir personas de dominio de Inglés limitado.

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Appendix B

Panhandle Developmental Disabilities Services
Title VI Discrimination Complaint Form

Title VI Discrimination Complaint Form

Please complete, sign, and return this form to the address listed at the bottom of the page.

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Complainant name							
Address		City		State		Zip code	
Phone		Email					

Person discriminated against, if different from complainant							
Address		City		State		Zip code	
Phone		Email					

Type of discrimination:	☐ Race/Color	☐ Age	☐ Sex	☐ National origin	☐ Disability	☐ Other
Date of incident						

Please provide the date and location of the alleged discriminatory actions, including both the earliest and most recent incidents.

Please provide a brief and clear account of the discriminatory incident, including details of what happened, who was involved and any differential treatment compared to others. You may also include supporting materials for your complaint. Please attach any additional written or supporting information that you believe is relevant to this complaint.

Please provide the names and contact information of persons, including witnesses or others, whom we may contact for additional information to investigate your complaint.

To process your complaint, please ensure it is signed and dated below.	
Signature	
Date	

MAIL

EMAIL

Panhandle Developmental Disabilities Services
P.O. Box 1327
Scottsbluff, NE 69361

rdavis@regohd.org

OFFICE USE ONLY			
Received by		Date received	

Título VI Formulario de queja por discriminación

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Complete, firme y envíe este formulario a la dirección que aparece en la parte inferior de la página.

Nombre del denunciante							
Dirección		Ciudad		Estado		Código postal	
Teléfono		Correo electrónico					

Víctima de la discriminación, si es diferente del denunciante							
Dirección		Cuidad		Estado		Código postal	
Teléfono		Correo electrónico					

Tipo de discriminación:	☐ Raza/Color	☐ Edad	☐ Sexo	☐ Nación de origen	☐ Discapacidad	☐ Otra opción
Fecha del incidente						

Proporcione la fecha y el lugar de las supuestas acciones discriminatorias, incluidos tanto los incidentes más tempranos como los más recientes.

Proporcione un informe breve y claro del incidente discriminatorio, incluidos los detalles de lo que sucedió, quién estuvo involucrado y cualquier tratamiento diferencial en comparación con otros. También puede incluir materiales de respaldo para su queja. Adjunte cualquier información adicional por escrito o de apoyo que considere relevante para esta queja.

Proporcione los nombres y la información de contacto de las personas, incluidos los testigos u otras personas, con quienes podamos comunicarnos para obtener información adicional para investigar su queja.

Para procesar su queja, asegúrese de que esté firmada y fechada a continuación.	
Firma	
Fecha	

DIRECCIÓN POSTAL

Panhandle Developmental Disabilities Services
P.O. Box 1327
Scottsbluff, NE 69361

CORREO ELECTRÓNICO

rdavis@regohd.org

SOLO PARA USO DEL OFICINA			
Recibido por		Fecha de recepción	

Appendix C

Panhandle Developmental Disabilities Services
Four-Factor Analysis and Language Assistance Plan

Panhandle Developmental Disabilities Services Four-Factor Analysis

Panhandle Developmental Disabilities Services does not provide transportation to the general public; transportation is provided exclusively to the eligible individuals with developmental and intellectual disabilities residing in the 11 counties in the Nebraska Panhandle region. Panhandle Developmental Disabilities Services personnel report that contact with limited English proficiency (LEP) persons is rare, with no LEP persons currently in contact with the agency. However, the following analysis was completed to inform a Language Assistance Plan that considers the needs of LEP persons who could potentially be encountered by the agency as it administers its programs in the service area.

To facilitate this analysis, 2020–2024 American Community Survey data were analyzed for the agency's service area to inform the four-factor analysis. The data show that the number and proportion of LEP persons in the service area is low, with approximately 92.7 percent of the population estimated to speak only English.

Based on the four-factor analysis, the number and proportion of non-English-speaking LEP persons in the Panhandle Developmental Disabilities Services area is low, with a very low number and proportion of Spanish-speaking LEP persons in the Panhandle Developmental Disabilities Services area and no other non-English language groups exceeding the Safe Harbor Threshold of 1,000 or more LEP persons or greater than 5 percent of the service area population. However, if staff encounter LEP individuals, employees are trained to respond appropriately and provide meaningful access to services using language assistance resources, as detailed in the Language Assistance Plan.

Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient

Panhandle Developmental Disabilities Services does not provide transportation to the general public; transportation is provided exclusively to eligible individuals with developmental and intellectual disabilities residing Banner, Box Butte, Cheyenne, Dawes, Deuel, Garden, Kimball, Morrill, Scotts Bluff, Sioux, and Sheridan Counties in Nebraska. To estimate the number and proportion of LEP individuals in the service area, data from the 2020–2024 American Community Survey were reviewed. For this analysis, "LEP" is defined as individuals who speak English less than "very well." LEP may also refer to individuals with limited ability to read, write, or understand English.

The following explains the Panhandle Developmental Disabilities Services service area LEP profile:

- The total number of persons over the age of 5 in the 11 counties in the Nebraska Panhandle region is 77,826.
- Approximately 92.7 percent of this total population speak English only.
- Spanish is the largest non-English language group in the Panhandle Developmental Disabilities Services service area. This language group is estimated to be 1,582 LEP persons, or approximately 2.0 percent of the area's total population.
- Other language groups in the service area contained a low number or proportion of LEP persons that did not surpass the Safe Harbor Threshold of 1,000 LEP persons or greater than 5 percent proportion of LEP persons in the service area.

Factor 1a: How LEP persons interact with the agency

Panhandle Developmental Disabilities Services does not provide transportation to the public; transportation is provided exclusively to individuals with developmental and intellectual disabilities in the Panhandle Developmental Disabilities Services network. Any LEP interactions will most likely occur while scheduling or providing transportation.

Factor 1b: Literacy skills of LEP persons in their native language to determine whether the translation of written documents will be an effective practice

No data could be obtained regarding the native language literacy of LEP persons in the Panhandle Developmental Disabilities Services service area nor does the agency maintain such data at this time. If additional data becomes available, it will be incorporated into future analyses. Based on current resources and practices, the agency does not anticipate significant barriers to service due to literacy limitations.

Factor 1c: Whether LEP persons are underserved due to language barriers

Given the low number and proportion of LEP individuals in the service area and the limited contact reported by staff, the agency does not anticipate language to be a barrier to accessing services.

Factor 2: Frequency of contact with LEP persons

Based on the current interactions with LEP individuals, the agency does not anticipate language to be a barrier to accessing services.

Factor 3: Nature and importance of the Program, Activity, or Service

Panhandle Developmental Disabilities Services offers transportation for clients, providing greater mobility and access to critical services. Trip purposes include doctor appointments, traveling to work or residences, social activities, and engaging in regular daily activities. These services are deemed important for its clients' lives.

Factor 4: Resources available and associated costs

Panhandle Developmental Disabilities Services has access to Title VI template documents (e.g., Title VI Notice to the Public, Title VI Complaint Form), and general Title VI assistance and oversight.

Language Assistance Plan

Panhandle Developmental Disabilities Services has access to language assistance resources through publicly available translation applications, and there are Spanish-speaking staff employed at the facility to provide translations as necessary. If Panhandle Developmental Disabilities Services holds a public hearing, distributed meeting documents, including meeting minutes, can be translated using these resources. These services can be used whenever in-person or over-the-phone interpretation is required to assist riders. The agency will also take reasonable steps to support LEP individuals who may choose to access its programs and services in the future.

Using NDOT resources, the Panhandle Developmental Disabilities Services Title VI Notice to the Public, Discrimination Complaint Form, and Discrimination Complaint Procedures Form have been translated into Spanish for public distribution and for posting on the agency's website.

Additionally, "I Speak" cards will be available at the agency's main office. These cards allow LEP individuals to quickly identify their spoken language when it cannot be easily determined by staff. This tool will help Panhandle Developmental Disabilities Services identify language assistance needs as they arise and ensure appropriate support is provided.

Appendix D

Panhandle Developmental Disabilities Services
Title VI Complaint Investigation Log