

**Title VI**

**2018 – 2020 Implementation Plan**

**Title VI of the Civil Rights Act of 1964**

**Way Station Inc.**



**Adopted date**

**January 1, 2018**

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## I. INTRODUCTION

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of 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 *Way Station Inc.*, a **private non-profit (501c3) organization**, incorporates nondiscrimination policies and practices in providing services to its clients.

See *IRS Certification of 501c3 status* in *Appendix G*.

## II. OVERVIEW OF SERVICES

Mission: Way Station, Inc. is *a not-for-profit (501c3) organization* dedicated to providing compassionate and quality behavioral health care, housing, and employment services to: adults with mental illness, developmental disabilities, and substance addictions; children and adolescents with emotional and behavioral challenges; and veterans with service needs.

Way Station embraces the principles of recovery and resiliency and is committed to providing evidence-based, consumer-driven, and family-focused services.

Founded in 1978, Way Station has a rich history of providing high quality care and achieving exceptional results. Way Station's advocacy role within the Maryland Public Mental Health System for the past quarter of a century demonstrates its ability to build and reform integrated and collaborative systems of care for individuals at-risk of institutional placement, and to effectively shift the focus of care away from institutions and back to community settings. In the 1970's, Way Station provided technical support to the Mental Hygiene Administration in shifting the locus of care for individuals with mental illness from institutions to communities by amending the State Medicaid Plan to provide coverage for community-based psychiatric rehabilitation day programs in the 1980's, Way Station was instrumental in assisting the Mental Hygiene Administration to make the next shift from facility-based community mental health care to more natural and integrated community settings such as an individual's home by amending the State Medicaid Plan again to allow for coverage of non-facility based services. Several years ago, Way Station was influential in taking the next step in system reform to allow more flexibility in community-based services, increase provider accountability and risk-sharing, and promote a "wraparound" model of care by changing the financing system.

Way Station services are licensed and approved by the Maryland Department of Health, Maryland Department of Human Resources, Maryland Division of Rehabilitation Services, and the Maryland Developmental Disabilities Administration, and are nationally accredited by the Commission on Accreditation of Rehabilitation Facilities (CARF). Way Station has been endorsed as a national exemplary model program by the National Institute of Mental Health and the National Alliance of the Mentally Ill, recognized by *USA Today* as the "bright spot" in Maryland's mental health system, and honored by the White House as one of America's "Points of Light."

**In 1996**, Way Station affiliated with the Sheppard and Enoch Pratt Health Foundation, a 100-year old, not-for-profit behavioral health system that has been recognized by *U.S. News & World Report* as operating one of the top ten psychiatric hospitals in the nation.

Services consist of:

- Child and Adolescent Services
- Community Employment Services
- Day Psychiatric Rehabilitation Services
- Developmental Disabilities Programs
- Homeless Outreach Program
- Mobile Crisis Program
- Assertive Community Treatment (ACT) Programs
- Outpatient Mental Health Clinic
- Residential Rehabilitation Programs
- Supported Living Programs
- Transition Age Youth Programs
- Veterans Programs
- Substance Abuse Services Program
- Behavioral Health Home

The Services provided by WSI are eligibility based (for example diagnosis, income) and available to the public as indicated by eligibility requirements. Once determined to be eligible for services our support service array is established by regulations that outline expectations. These regulations include Code of Maryland, Federal, State and local grants, etc. WSI policies, Protection and Promotion of Persons Served and Equal Access to Services and Benefits outline obligations of the organization related to client rights.

### III. POLICY STATEMENT AND AUTHORITIES

#### Title VI Policy Statement

*Way Station Inc.* 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.

*Way Station Inc.* 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.

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Scott Rose, Chief Executive Office

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December 11, 2017

#### 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).

#### **IV. 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, *Way Station Inc.* 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, *Way Station Inc.* confirms to MTA our commitment to nondiscrimination and compliance with federal and state requirements.

#### **V. PLAN APPROVAL DOCUMENT**

**I hereby acknowledge the receipt of the *Way Station Inc.* Title VI Implementation Plan 2018-2020. I have reviewed and approve the Plan. I am committed to ensuring that no person is excluded from participation in, or denied the benefits of *Way Station Inc.*'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.**

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Scott Rose, Chief Executive Officer

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December 11, 2017

#### **Way Station Inc. Board Approval**

**I hereby certify that the 2018 - 2020 Title VI Plan was presented and approved by the Executive Committee of Way Station's Board of Directors through a specially scheduled virtual meeting on 12/5/17. After previously reviewing the Plan in detail, the following members of the Executive Committee unanimously voted to approve the 2018 – 2020 Title VI Plan on December 5<sup>th</sup>: Martha Kirkland (Board Chair), Fred Hinze, Bill Haugh, and Beth Beam.**

Jean Moise, Executive Vice President

December 11, 2017

## **VI. ORGANIZATION AND TITLE VI PROGRAM RESPONSIBILITIES**

Under the authority of *Way Station Inc.*, **Jean R. Moise, Executive Vice President**, 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 general public 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, *Way Station Inc.* 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 log of the public outreach and involvement activities undertaken to ensure that minority and low-income people had a meaningful access to these activities.

### **2. Annual Report and Updates**

As a sub-recipient of FTA funds, *Way Station Inc.* 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. *Way Station Inc.* will also maintain and provide to the MTA an annual basis, the log of public outreach and involvement activities undertaken to ensure that minority and low-income people had a 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
- 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 notice 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 the public, as described in the “public outreach and involvement” section of this document, and in other languages when needed according to the LEP 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 unequal treatment or discrimination in the receipt of benefits/services or prohibited by non-discrimination requirements. **Way Station Inc.** 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 resolution will be logged as described under Section 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 course of the Annual Title VI Program Review (item 3 above), the Title VI Manager will determine whether or not an update is needed.

**7. Internal education** - Our employees will receive training on 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), 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 *Jean R. Moise, Executive Vice President.***

**8. Title VI clauses in contracts** - In all federal procurements requiring a written contract or Purchase Order (PO), **Way Station Inc.**’s contract/PO will include appropriate non-discrimination clauses. The Title VI Manager will work with the ***Gordon G. Rothrock, Chief Financial Officer***, who is/are responsible for procurement contracts and PO’s to ensure appropriate non-discrimination clauses are included.

## VII. GENERAL REPORTING REQUIREMENTS

### REQUIREMENT TO PROVIDE A TITLE VI PUBLIC NOTICE – SEE APPENDIX A

Title 49 CFR Section 21.9(d) requires recipients to provide information to the public regarding the recipient's obligations under DOT's Title VI regulations and apprise members of the public of the protections against discrimination afforded to them by Title VI. At a minimum, **Way Station Inc.** shall disseminate this information to the public by posting a Title VI notice on the agency's website and in public areas of the agency's office(s), including the reception desk, meeting rooms, in federally-funded vehicles, etc.

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of 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).

**Way Station Inc.** is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transportation services on the basis of race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1B. If you feel you are being denied participation in or being denied benefits of the transit services provided by **Way Station Inc.** or otherwise being discriminated against because of your race, color, national origin, gender, age, or disability, please contact the following representative:

**Jean R. Moise**

**Executive Vice President**

Way Station Inc.

230 West Patrick Street; PO Box 3826

Frederick, MD 21705-3826

301-662-0099 ext. 1219

[jmoise@waystationinc.org](mailto:jmoise@waystationinc.org)

## **TITLE VI COMPLAINT PROCEDURES**

### **REQUIREMENT TO DEVELOP TITLE VI COMPLAINT PROCEDURES AND COMPLAINT FORM. – SEE APPENDIX B**

In order to comply with the reporting requirements established in 49 CFR Section 21.9(b), all recipients shall develop procedures for investigating and tracking Title VI complaints filed against them and make their procedures for filing a complaint available to members of the public. Recipients must also develop a Title VI complaint form. The form and procedure for filing a complaint shall be available on the recipient's website and at their facilities.

### **Sample of Narrative**

Any individual may exercise his or her right to file a complaint with *Way Station Inc.* if that person believes that he or she have 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, 5<sup>th</sup> floor – TCR, 1200 New Jersey Avenue SE, Washington, DC 20590.**

*Way Station Inc.* 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:

*Way Station Inc. is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transportation services on the basis of race, color or national origin, as protected by Title VI in the Federal Transit Administration (FTA) Circular 4702.1B. For additional information on Way Station Inc.'s nondiscrimination policies and procedures, or to file a complaint, please contact Jean R. Moise, Executive Vice President, [jmoise@waystationinc.org](mailto:jmoise@waystationinc.org), (301) 662-0099 ext. 1219, P.O. Box 3826, Frederick, Md. 21705-3826.*

Instructions for filing Title VI complaints are posted on the agency's website and in posters on the interior of each vehicle operated in passenger service and agency's facilities, and are also included with *Way Station Inc.*'s policies and related brochures.

A copy of *Way Station Inc.*'s Title VI Complaint Form is attached in *Appendix B*.

## **Procedures for Handling and Reporting Investigations/Complaints and Lawsuits – SEE APPENDIX C**

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 any Title VI lawsuits are filed against *Way Station Inc.*, the agency will follow these procedures:

### **Procedures**

- a. Any individual, group of individuals or entity that believes they have been subjected to discrimination on the basis of 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 formal complaint must be filed within 180 calendar days of the alleged occurrence.
  - b. The complaint should include:
    - the complainant’s name, address, and contact information (i.e., telephone number, email address, etc.)
    - the 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)
    - a description of the alleged act of discrimination
    - the location(s) of the alleged act of discrimination (include vehicle number if appropriate)
    - an explanation of why the complainant believes the act to have been discriminatory on the basis of race, color, and national origin
    - if known, the names and/or job titles of those individuals perceived as parties in the incident
    - contact information for any witnesses
    - 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 **230 West Patrick Street PO Box 3826 Frederick MD 21705** and or [jmoise@waystationinc.org](mailto:jmoise@waystationinc.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.
1. Upon receipt of the complaint, the Title VI Manager will immediately:
    - a. notify MTA (no later than 3 business days from receipt)
    - b. notify *Way Station Inc.* Authorizing Official
    - c. ensure that the complaint is entered in the complaint database.
  2. Within 3 business days of receipt of the complaint, the Title VI Manager will contact the complainant by telephone to set up an interview.

3. 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.
4. If MTA has assigned staff to assist with the investigation, the Title VI Manager will offer an opportunity to participate in the interview.
5. The alleged discriminatory service or program official will be given the opportunity to respond to all aspects of the complainant's allegations.
6. The Title VI Manager will determine, based on relevancy or duplication of evidence, which witnesses will be contacted and questioned.
7. 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.
8. All steps taken and findings in the investigation will be documented in writing and included in the complaint file.
9. 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.
10. 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.
11. 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.
12. 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 – *SEE APPENDIX C***

### **Background**

All recipients shall prepare and maintain a list of any of the following that allege 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 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 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 OUTREACH EFFORTS AND INVOLVEMENT –**

### ***SEE APPENDIX D***

### **Public Participation Plan**

#### **Introduction**

The Public Participation Plan (PPP) is a guide for ongoing public participation endeavors. Its purpose is to ensure that **Way Station Inc.** 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, transit operators 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.

**Way Station Inc.** 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.

**Way Station Inc.** 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, cultural, economic, historical, or other barriers that may prevent minority and LEP persons from effectively participating in our decision-making process.

**Way Station Inc.** seeks and values stakeholder input at all levels of the organization and solicits, analyzes, and uses stakeholder input to develop, evaluate, and improve its services. Input is obtained on an ongoing basis from consumers, employees, and other stakeholders including consumer family members, licensing and funding entities, and other community service providers to help the organization determine and meet the expectations and preferences of its stakeholders. Input is used for a variety of other purposes such as program planning, performance improvement, strategic planning, advocacy, and financial resource allocations.



**Way Station** uses a variety of formal and informal mechanisms to obtain stakeholder input including, but not limited to the following:

- a. Individual Planning – Way Station encourages its clients to participate in the development of their individual service plans at least every six months. Individual employee goals and objectives are developed by employees and their supervisors at least annually via the employee evaluation process.
- b. Input Forums – Way Station clients and staff are encouraged to actively participate in program evaluation and planning processes through a number of regularly scheduled forums including community meetings, house meetings, staff meetings, and semi-annual organizational “State of the Station” meetings. Special focus groups are organized on an as needed basis.
- c. Surveys – Surveys are useful and appropriate tools to gather stakeholder input regarding a variety of organizational concerns and are developed and distributed on an as needed basis. Consumer satisfaction surveys are conducted at least annually. Employee surveys are conducted at least every two years.
- d. Grievance Procedures – A formal grievance procedure is available to consumers, employees and the community at large. Grievances are reviewed by the Director of Compliance and Quality Improvement at least once a year to identify any trends that may suggest a need for training of systemic changes. A summary of grievances/trends is reviewed with the Board of Directors at their annual meeting. Incident reports are summarized and reviewed by the management teams on a quarterly basis.
- e. Incident Reporting – Significant incidents regarding matters of safety, security, breeches of policy or conflicts with outside agencies or individuals are to be reported through the organization’s internal Incident Report System. These reports are copied to the the appropriate department supervisors, managers, or directors involved and to the Director of Compliance and Quality Improvement who tracks and summarizes the reports for review by the management teams on a quarterly basis.
- f. Strategic Planning – Way Station’s Strategic Plan is reviewed and revised annually by the Strategic Planning Committee with input from stakeholders. At least every three years the committee solicits input from the stakeholders including consumers, families, employees, licensing and funding entities, and other community organizations. Members of the Strategic Planning Committee also consider stakeholder input through other mechanisms such as through their relationships with stakeholders.
- g. Open Door Policy – Management staff maintain an open door policy. Stakeholders are welcome to schedule individual meetings to discuss ideas and air concerns.

- h. Program and Service Development – Way Station collects and analyzes planning information from local community agencies such as County Core Service Agencies, local management boards, and other government agencies to pursue program and service development opportunities accordingly.
- i. Relationships with other Organizations – Way Station is committed to having positive, collaborative relationships with other agencies and organizations, regulatory and licensing bodies, funding sources, and other community stakeholders. These ongoing relationships provide a mechanism to coordinate a continuum of care for mutually served consumers and to work together to creatively solve problems. These relationships also provide an ongoing opportunity to obtain feedback and input into our evaluation and planning processes. Through its relationships with other organizations, Way Station is able to remain knowledgeable about changes in the environment in which it operates including opportunities for growth and development and how it could effectively have an impact on external policy development.

**SEE APPENDIX D: SUMMARY OF OUTREACH EFFORTS**

## **ACCESS FOR LIMITED ENGLISH PROFICIENT (LEP) PERSONS**

### **LANGUAGE ASSISTANCE PLAN – *SEE APPENDIX E***

#### **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.

As required, *Way Station Inc.* developed a written LAP Plan (Appendix E). Using 2010 and American Community Survey (ACS) Census data, *Way Station Inc.* 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 1:      Assessment of the Number and Proportion of LEP Persons Likely to be Served or Encountered in the Eligible Service Population**
  
- Factor 2:      Assessment of Frequency with Which LEP Individuals Come Into Contact with the Transit Services or System**
  
- Factor 3:      Assessment of the Nature and Importance of the Transit Services to the LEP Population**
  
- Factor 4:      Assessment of the Resources Available to the Agency and Costs**

**Factor 1:** Language Needs Assessment: The number or proportion of LEP persons in the service area who may be served or are likely to encounter a Way Station program, activity, or service.

Upon review of The Reference Guide of Languages Spoken by LEP Individuals by County provided to Way Station by the MDOT, and by applying data from Way Station, Inc. enrollment in FY17, Way Station has determined the potential number of LEP persons served or encountered in its enrolled clients.

According to the provided guide data in the counties where Way Station, Inc. operates behavioral health services and utilizes MTA vehicles to transport clients include, the total LEP population is:

- Carroll County 1.30%
- Frederick County 4.31%
- Howard County 7.65%
- Washington County 2.18%

Way Station, Inc. data (see below) indicates that our potential LEP population is very small. Data is collected at the time of enrollment in to services. The largest identified potential language is Spanish. It is noted that there are holes in our data. Individuals with “other” languages need to be able to identify the language in our records and that will be addressed if possible. There are a significant number of individuals that did not have data, which will be addressed.

Way Station does not have data organized to be able to indicate the percentage of potential LEP by County. Looking at our total enrollment with or without the clients not identified in the data properly, Way Station’s potential LEP population is 1.1%.

**Factor 2:** The frequency with which LEP persons come in contact with Way Station programs, activities, or services.

The most frequent contact between LEP persons and Way Station occurs through Way Station’s Receptionists/Phone Operators and Enrollment Departments in each county/program, which report minimal but an increase in interaction with LEP persons. Special language assistance is required 2-3 times per year for most departments. Our newest program PROMISE (which does not use MTA vehicles), a 5-year grant designed is implementing through services provided to youth in the State of Maryland. Way Station, Inc. is providing employment support services to assist youth/families who currently receive SSI with a goal of helping folks become less dependent on entitlements. Since starting to provide services in April, they have already encountered 6 families requiring interpreters. Way Station’s automated phone system offers instruction in Spanish. We have updated our centralized phone system to improve the Spanish option.

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

Way Station provides programs, activities, and services that meet basic human needs (e.g., housing) and enhance the overall quality of life (e.g., behavioral health services). For this reason, Way Station has developed and implemented a language implementation plan that is intended to enhance access to its programs, activities, and services for LEP persons.

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

Way Station assessed its available resources that could be used for providing LEP assistance, including identifying bilingual staff, determining how much a professional interpreter and translation service would cost on an as-needed basis, and which of its documents would be the most valuable to be translated. This year we have discovered free translation services in one of our communities, specifically for Spanish. PROMISE has developed enrollment paperwork in Spanish and is in the process of reviewing for implementation. The type and amount of staff training that might be needed was also considered. Based on the four-factor analysis, Way Station developed its LEP Plan as documented in the following section.

(See complete Way Station LAP at Appendix E)

## **EQUAL ACCESS TO SERVICES AND BENEFITS**

It is the goal of Way Station to implement a philosophy which values and supports human diversity. We recognize that individual differences enrich and contribute to Way Station's variety of role models, cultural heterogeneity, open-mindedness and atmosphere of acceptance. Our hope is to develop an organizational environment which counters stigma with celebration and encourages positive integration of all individuals of the Way Station community.

Way Station's policy is set forth below (also see "Compliance with State and Federal Labor and Employment Statutes" policy):

- 1) General Discrimination Prohibited  
No person, whether client or employee, volunteer or student, on the ground of race, color, age, sex, national origin, marital status, disability, sexual orientation, economic situation, religion or political affiliation shall be excluded from participation in, be denied the services or benefits of, or be otherwise subjected to discrimination by Way Station, Inc. This policy applies to unequal treatment in priority, quality, quantity, methods or charges for service, occupancy or benefit, participation in the service or in the use, occupancy or benefit of any personnel policy, facility or in implementation.
- 2) Specific Discriminatory Actions Prohibited

Way Station or its employees shall not directly or through contractual or other arrangements, based upon race, color, age, sex, national origin, marital status, disability, sexual orientation, economic situation, religion or political affiliation:

- a) Deny an individual any service, financial aid, privilege or other benefit provided by the organization or through the program.
  - b) Provide any service, financial aid, or other benefit, to an individual who is different, or is provided in a different manner, from that provided to others in the organization or through program services;
  - c) Subject an individual to segregation or separate treatment in any matter related to his/her receipt of any service, financial aid, or other benefit provided by the organization or through the program.
  - d) Restrict an individual in any way in the enjoyment of advantage, or privilege, enjoyed by others receiving any service, financial aid, or other benefit provided by the organization or through the program;
  - f) Assign members to employees;
  - g) Deny an individual an opportunity to participate in the program through the provision of services or otherwise afford him/her an opportunity to do so which is different from that afforded others in the organization or through program services;
  - h) Deny an individual the utilization of any or all facilities of this organization.
- 3) Discriminatory Effects Prohibited  
Way Station may not utilize criteria or methods of administration which have the effect of subjecting individuals to discrimination, or have the effect of defeating or substantially impairing the accomplishment of equal access for individuals of a particular race, color, age, sex, national origin, marital status, disability, sexual orientation, economic situation, religion or political affiliation.
- 4) Complaint Procedures
- a) Questions, criticisms, complaints and charges of discrimination should be resolved, to extent possible, at the level at which the problem is identified.
  - b) Complaints not resolved at that level may be pursued in accordance with Way Station's grievance procedures (e.g. Client Grievance/Complaints procedure, Employee Grievance Procedure), and in any other manner permitted by law.

Policy Reference: Client Grievance/Complaints  
Employee Grievance Procedure  
Compliance with State and Federal Labor and Employment Statutes

**MINORITY REPRESENTATION ON PLANNING AND ADVISORY BODIES –*****SEE APPENDIX F***

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.”

As an out-patient Mental Health (MH) Treatment facility primarily, providing transportation services in support of MH support and treatment, ***Way Station Inc.*** has NO specific transit-related, non-elected planning boards, advisory councils or committees, or similar committees, the membership of which we select. Clients of ***Way Station Inc.*** provide input into the services they receive (including transportation) through a number of means. Please see ***Summary of Outreach Efforts (Appendix D)***.



**APPENDIX A: TITLE VI NOTICE TO THE PUBLIC****ATTENTION:**

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of 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).

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

Jean R. Moise  
Executive Vice President  
Way Station Inc.  
230 West Patrick Street PO Box 3826  
Frederick, MD 21705-3826  
301-662-0099 ext. 1219  
[jmoise@waystationinc.org](mailto:jmoise@waystationinc.org)

**APPENDIX A: List of Locations where Title VI Notices are posted:**

Reception areas of the following PRP Day Programs of our commercial buildings:

Frederick Co. PRP  
230 West Patrick St.  
Frederick Md 21701

Howard Co. PRP and MH Clinic  
9030 Route #108, Suite A  
Columbia, Md 21045

Washington Co. PRP  
328 N. Potomac St.  
Hagerstown, Md 21740

Child and Adolescent Services  
219 West Patrick St.  
Frederick, Md 21701

Segue Community Reintegration Program  
6655 Sykesville Rd.; Cottage #3  
Sykesville, Md 21784

North Point Veterans Program  
25 E. North Ave.  
Hagerstown, Md 21740

**APPENDIX B: TITLE VI COMPLAINT FORM**

Transportation Related Title VI Complaint Form

File this complaint with ***Jean R. Moise at 301-662-0099; #1219***

PO Box 3826, Frederick MD 21705-3826

Name:

Address:

Telephone Number (Home)

(Work)

Email

Accessible Format Requirements?

Large Print

TDD

Audio Tape

Other

Are you filing the complaint on your own behalf? Yes\*      No

\*If yes, go to Question Number

If no, please supply the name and relationship of the person for whom you are complaining

Why are you filing for the person?

I believe the discrimination I experienced was based on (check all that apply)

\_\_\_Race

\_\_\_Color

\_\_\_National Origin

Date of Alleged Discrimination (Month, Day, Year):

Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.

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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 any Federal or State court?

Yes No

If yes, check all that apply:

Federal Agency

Federal Court

State Court

State Agency

Local Agency

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

Name

Title

Agency/court:

Address

Phone Number

Name of the Agency complaint is against:

Contact person

Title:

Telephone Number:

Please attach any written material or other information that you think is relevant to your complaint.

Signature and Date required below

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Please submit this form in person to Way Station, attn. of Jean R. Moise, Executive Vice President, at 210 Abrecht Place, Frederick MD or mail to PO Box 3826 Frederick MD 21705-3826



## **APPENDIX D: SUMMARY OF OUTREACH EFFORTS**

As with all of the services provided by **Way Station Inc.** (including our transportation services), we continually seek and value stakeholder input at all levels of the organization and solicit, analyze, and use stakeholder input to develop, evaluate, and improve all our services. Input is obtained on an ongoing basis from consumers, employees, and other stakeholders including consumer family members, licensing and funding entities, and other community service providers to help the organization determine and meet the expectations and preferences of its stakeholders. Input is used for a variety of other purposes such as program planning, performance improvement, strategic planning, advocacy, and financial resource allocations.

**Way Station** uses a variety of formal and informal mechanisms to obtain stakeholder input including, but not limited to the following:

- j. Individual Planning – Way Station encourages its clients to participate in the development of their individual service plans at least every six months. Individual employee goals and objectives are developed by employees and their supervisors at least annually via the employee evaluation process.
- k. Input Forums – Way Station clients and staff are encouraged to actively participate in program evaluation and planning processes through a number of regularly scheduled forums including community meetings, house meetings, staff meetings, and semi-annual organizational “State of the Station” meetings. Special focus groups are organized on an as needed basis.
- l. Surveys – Surveys are useful and appropriate tools to gather stakeholder input regarding a variety of organizational concerns and are developed and distributed on an as needed basis. Consumer satisfaction surveys are conducted at least annually. Employee surveys are conducted at least every two years.
- m. Grievance Procedures – A formal grievance procedure is available to consumers, employees and the community at large. Grievances are reviewed by the Director of Compliance and Quality Improvement at least once a year to identify any trends that may suggest a need for training or systemic changes. A summary of grievances/trends is reviewed with the Board of Directors at their annual meeting. Incident reports are summarized and reviewed by the management teams on a quarterly basis.
- n. Incident Reporting – Significant incidents regarding matters of safety, security, breaches of policy or conflicts with outside agencies or individuals are to be reported through the organization’s internal Incident Report System. These reports are copied to the appropriate department supervisors, managers, or directors involved and to the Director of Compliance and Quality Improvement who tracks and summarizes the reports for review by the management teams on a quarterly basis.

- o. Strategic Planning – Way Station’s Strategic Plan is reviewed and revised annually by the Strategic Planning Committee with input from stakeholders. At least every three years the committee solicits input from the stakeholders including consumers, families, employees, licensing and funding entities, and other community organizations. Members of the Strategic Planning Committee also consider stakeholder input through other mechanisms such as through their relationships with stakeholders.
- p. Open Door Policy – Management staff maintain an open door policy. Stakeholders are welcome to schedule individual meetings to discuss ideas and air concerns.
- q. Program and Service Development – Way Station collects and analyzes planning information from local community agencies such as County Core Service Agencies, local management boards, and other government agencies to pursue program and service development opportunities accordingly.
- r. Relationships with other Organizations – Way Station is committed to having positive, collaborative relationships with other agencies and organizations, regulatory and licensing bodies, funding sources, and other community stakeholders. These ongoing relationships provide a mechanism to coordinate a continuum of care for mutually served consumers and to work together to creatively solve problems. These relationships also provide an ongoing opportunity to obtain feedback and input into our evaluation and planning processes. Through its relationships with other organizations, Way Station is able to remain knowledgeable about changes in the environment in which it operates including opportunities for growth and development and how it could effectively have an impact on external policy development.



## ***APPENDIX E:***

### **LANGUAGE ASSISTANCE PLAN**

WAY STATION INC.

#### **Introduction**

Way Station has prepared this Language Access Plan (“LAP” or “Plan”), which defines the actions to be taken by Agency to ensure meaningful access to agency services, programs and activities on the part of persons who have limited English proficiency. The Agency 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).

#### **Purpose**

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

Way Station 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 Agency staff. A client maintains the right to self-identify as a LEP person.

#### **Agency Description**

Way Station, Inc. is a not-for-profit, (501C3) organization dedicated to providing compassionate and quality behavioral health care, housing, and employment services to: adults with mental illness, developmental disabilities, and substance addictions; children and adolescents with emotional and behavioral challenges; and veterans with service needs.

Way Station embraces the principles of recovery and resiliency and is committed to providing evidence- based, consumer-driven, and family-focused services.

**Language Access Plan:**

Approach: Way Station's Language Access Plan shall be fully implemented subject to the availability of fiscal resources to implement said language access plan. This Language Access Plan represents Way Station's administrative blueprint to provide meaningful access to Agency services, programs and activities on the part of LEP individuals. This Language Access Plan outlines the tasks Way Station will undertake to meet this objective.

***Agency Language Access Coordinator:***

Jill Griffith  
Director of Compliance and Quality Improvement  
Way Station Inc.  
West Patrick Street PO Box 3826  
Frederick, MD 21705-3826  
301-662-99 . 1403  
[jgriffith@waystationinc.org](mailto:jgriffith@waystationinc.org)

**Factor 1:** Language Needs Assessment: The number or proportion of LEP persons in the service area who may be served or are likely to encounter a Way Station program, activity, or service.

Upon review of The Reference Guide of Languages Spoken by LEP Individuals by County provided to Way Station by the MDOT, and by applying data from Way Station, Inc. enrollment in FY17, Way Station has determined the potential number of LEP persons served or encountered in its enrolled clients.

According to the provided guide data in the counties where Way Station, Inc. operates behavioral health services and utilizes MTA vehicles to transport clients include, the total LEP population is:

- Carroll County 1.30%
- Frederick County 4.31%
- Howard County 7.65%
- Washington County 2.18%

Way Station, Inc. data (see below) indicates that our potential LEP population is very small. Data is collected at the time of enrollment in to services. The largest identified potential language is Spanish. It is noted that there are holes in our data. Individuals with "other" languages need to be able to identify the language in our records and that will be addressed if possible. There are a significant number of individuals that did not have data, which will be addressed.

Way Station does not have data organized to be able to indicate the percentage of potential LEP by County. Looking at our total enrollment with or without the clients not identified in the data properly, Way Station's potential LEP population is 1.1%.

**Factor 2:** The frequency with which LEP persons come in contact with Way Station programs, activities, or services.

The most frequent contact between LEP persons and Way Station occurs through Way Station's Receptionists/Phone Operators and Enrollment Departments in each county/program, which report minimal but an increase in interaction with LEP persons. Special language assistance is required 2-3 times per year for most departments. Our newest program PROMISE (which does not use MTA vehicles), a 5-year grant designed is implementing through services provided to youth in the State of Maryland. Way Station, Inc. is providing employment support services to assist youth/families who currently receive SSI with a goal of helping folks become less dependent on entitlements. Since starting to provide services in April, they have already encountered 6 families requiring interpreters. Way Station's automated phone system offers instruction in Spanish. We have updated our centralized phone system to improve the Spanish option.

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

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

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***Vital Document Translation:***

There are numerous language assistance measures available to LEP persons, including both oral and written language services. There are also various ways in which Way Station staff

respond to LEP persons. Resources are listed on the Homepage under Information Links/ Corporate Compliance.

***Stakeholder Consultations:***

Receptionists/telephone operators, enrollment staff, and managers of all Way Station, Inc. programs will be surveyed on their experience concerning contacts with LEP persons.

***Staff Training:***

Way Station personnel are oriented to Way Station's commitment to maintaining and enhancing an accessible environment for persons served and other stakeholders and to the provisions it makes to enhance accessibility in its policies and procedures. On an annual basis, staff are required to review these policies and procedures and to successfully complete cultural competency training.

The following training will be integrated with existing training provided to Way Station staff:

- Information about Title VI and LEP responsibilities.
- Description of language assistance offered to the public.
- Use of Language Line and interpreters.
- How to handle a potential Title VI/LEP complaint.

***Notice to Clients:***

Clients are informed notified of free language assistance and how they may access such assistance by enrollment staff.

***To be included as an attachment to LAP:***

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

***Jean R. Moise***

***Executive Vice President***

Way Station Inc.

230 West Patrick Street PO Box 3826

Frederick, MD 21705-3826

301-662-0099 ext. 1219

[jmoise@waystationinc.org](mailto:jmoise@waystationinc.org)

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Scott Rose, Chief Executive Officer

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December 11, 2017

**Language Access Complaint Procedure:** See above process using Title VI Complaint Form which accepts LEP/LAP complaints as well.

## ***APPENDIX F: MINORITY COMMITTEE REPRESENTATION***

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.”

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