

## **Title VI Program Compliance Plan: We Reach Inc**

### **Policy Statement**

We Reach Inc adopted this Title VI Program Compliance Plan to ensure the college is in compliance with the provision of Title VI of the Civil Rights Act of 1964 and related non-discrimination authorities. We Reach Inc prohibits discrimination on the basis of race, color, gender/sex including pregnancy gender identity, sexual orientation, age, marital status, religion, national or ethnic origin, veteran status, non-disqualifying disability, income status, or LEP. This applies to all our departments and activities.

Any inquiries or grievances concerning these regulations may be directed to the Safety & Compliance Manager, We Reach Inc, 974 Bennington St, East Boston, MA, 02128, (857) 557-5027. The Company will promptly address any such discrimination once informed.

We Reach Inc's Safety & Compliance Manager is ultimately responsible for and committed to the effective implementation of the Title VI Program to achieve compliance with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, and related non-discrimination authorities as identified in the Federal Motor Carrier Safety Administration's Title VI Program Assurance, including 49 CFR Part 21 and 49 CFR Part 303. Responsibility for the day-to-day administration of the program will be that of the Title VI Program Coordinator, who is currently the Director of Campus Operation & Institutional Effectiveness. The Title VI Program Coordinator has the authority and responsibility to effectively carry out his/her duties. The Title VI Program Coordinator and organizational staff ensure We Reach Inc 's compliance with Title VI and its implementing regulations. We Reach Inc is committed to ensuring that the fundamental principles of equal opportunity are upheld in all decisions involving our employees and students. This policy statement will be circulated throughout We Reach Inc and incorporated by reference in all contracts, agreements and services administered by We Reach Inc.

  
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Jose Perez  
Executive Director  
We Reach Inc

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Date

June 13, 2022

## **FMCSA Title VI Program Assurance**

See Exhibit A, The United States Department of Transportation Standard Title VI/Non-Discrimination Assurances DOT Order No. 1050.2A

## **Description of Federal-Aid Programs**

We Reach Inc, through its curriculum and CDL training programs, works to reduce crashes, fatalities and injuries involving commercial motor vehicles (CMVs) through enforcement of CMV safety regulations and outreach to the CMV community, enforcement personnel and the general public. Through a partnership with FMCSA, PHMSA, state, provincial, territorial and local members, as well as industry, CVSA helps ensure that both industry and enforcement understand the CMV safety regulations. This leads to uniformity of enforcement and improved compliance, promotes safe practices and fosters a better appreciation for the CMV industry. CVSA will achieve improvements in driver, vehicle and hazardous materials safety through the activities such as national enforcement campaigns, in-person and web-based education initiatives roadside enforcement and inspection data quality improvements, performance- based brake testers, and production of roadside enforcement and inspection training videos. These CVSA programs address multiple priority areas identified in FMCSA's Motor Carrier Safety Assistance Program's (MCSAP) High Priority Grant Program (HP) and PHMSA's Community Safety Grant (CSG) Notice of Funding Opportunities (NOFO), including targeting unsafe driving in high-risk crash corridors, improving CMV safety and compliance with safety regulations, and public awareness and education.

"Guardian" is a quarterly publication designed to foster awareness, inform and educate relevant North American commercial motor vehicle enforcement and industry segments on the latest CMV safety-related information and topics. With multiple jurisdictions throughout North America all doing their part to advance the ultimate goal of reducing the number of traffic crashes, injuries and fatalities, CVSA will develop, edit and publish a quarterly magazine, "Guardian," to help enhance and maintain core competencies in areas of roadside inspections, traffic enforcement, safety audits and compliance reviews for enforcement, motor carriers and industry, and to increase public awareness of commercial motor vehicles and educate both the public and private sectors. Specific audiences include: program directors, MCSAP managers, We Reach Inc - and FMCSA-certified inspectors and investigators, FMCSA and PHMSA personnel; departments of transportation, public utility and service commissions, state police, highway patrols, departments of motor vehicles and ministries of transport; related associations, agencies and organizations; as well as academia, transportation safety organizations and trade associations, trucking and bus companies, manufacturers, industry suppliers and vendors, training institutions, consultants, insurance companies, state and provincial trucking associations, and small fleet owner operators. The magazine also provides an opportunity for various members of law enforcement, as well as industry members, to share experiences, knowledge and best practices.

## **Notification to Beneficiaries/Participants**

See Exhibit B, Public Notice of Title VI Program Rights.

For the beneficiaries' consideration, We Reach Inc is providing:

- The Title VI Program Compliance Plan
- Instructions in Filing a Title VI Complaint
- Title VI Complaint Form
- Reference Documents

We Reach Inc has included the Public Notice of Title VI Program Rights on our website at <https://wereach.us/titlevi>. In addition, the Public Notice of Title VI Program Rights will also be posted in the headquarters facility where activity or services are conducted.

### **Sub-Recipient Compliance Reports**

We Reach Inc does not intend to sub-award FMCSA or PHMSA funds.

### **Training**

We Reach Inc has assigned the responsibility for Title VI and nondiscrimination program compliance regarding FMCSA and/or PHMSA program activities and services to the project manager responsible for each grant award. That person has reviewed the FMCSA- and/or PHMSA-related responsibilities assigned to the project staff and the Title VI Program Coordinator. The staff and Title VI Program Coordinator have received a copy of the combined FMCSA and PHMSA Basis Title VI Program Training. Training is conducted annually by the project manager using the Title VI Program Policy Statement and other program information, and routine training is conducted using college email, newsletters and other communications methods. The training provides comprehensive information on Title VI Program requirements and its application to specific programs or operations; assistance on the identification of Title VI Program-related issues; and an overview of the complaint process.

All persons with responsibility under the program, or receiving training under the program, will sign an acknowledgement indicating that they understand the We Reach Inc Title VI Program and have received appropriate training.

### **Access to Records**

We Reach Inc is responsible for ensuring all records relating to the effective implementation of Title VI Program requirements are available for review by FMCSA and/or PHMSA. The corporation will make documents available to FMCSA and/or PHMSA staff upon request. This includes documents required for compliance reviews and/or complaint investigations conducted by FMCSA and/or PHMSA.

### **Complaint Disposition Process**

We Reach Inc is committed to a policy of nondiscrimination in the conduct of its business, including its Title VI Program responsibilities. We Reach Inc prohibits discrimination on the basis of race, color, gender/sex including pregnancy's gender identity, sexual orientation, age, marital

status, religion, national or ethnic origin, veteran status, non-disqualifying disability, income status, or LEP. This applies to our educational, admissions and employment policies, treatment of students, and other college-administered programs and activities.

A copy of the Title VI Complaint Form is available by calling 857-557-5027 or by email info@wereach.us. Complaints should be addressed to: We Reach Inc, Title VI Program Coordinator, 974 Bennington St, East Boston, MA, 02128.

All complaints will be investigated promptly. Listed below is the process for disposition of the complaint.

1. Any person who believes he or she has been subjected to discrimination under Title VI may file a Title VI Program complaint with Bay State College within 180 days from the date of the alleged discrimination by completing a Title VI Program Complaint Form (See attached. A copy of this form is also available at the above locations).
2. In instances where additional information is needed, the Title VI Program Coordinator will contact the complainant in writing. Failure of the complainant to provide the requested information by a certain date may result in the administrative closure of the complaint or a delay in complaint resolution.
3. Following receipt of all required information, the Title VI Program Coordinator will complete the investigation, produce a formal report (Report of Investigation) and respond to the complainant in writing within 90 days of receipt of all complaint information. Receipt of additional relevant information and/or the simultaneous filing of complaints with Bay State College and other external entities may delay the timing of the complaint resolution.

The We Reach Inc Title VI Program Coordinator will maintain a Title VI Program Complaint Log to include the following information, name of complainant, identification by demography (i.e., race, color, national origin, etc.), allegation(s), complaint date, date of report of investigation, determination made and date, and any other relevant information as deemed appropriate. The Complaint Log will be available to FMCSA and/or PHMSA upon request.

#### **Status of Corrective Actions Implemented by Applicant to Address Deficiencies Previously Identified During a Title VI Program Compliance Review**

The We Reach Inc Title VI Program has not been audited and is not operating under any corrective action plan.

#### **Community Participation Process**

This requirement is not applicable to We Reach Inc.