

## Title VI Program Compliance Plan

### Title VI Program Policy Statement

See Exhibit C.

### 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 Program

Through a partnership with FMCSA, Lehigh Carbon Community College (LCCC) will provide a Class A Truck Driving Program that accommodates the varying needs of students by offering the convenience of both weekday and weekend courses with new classes starting every three weeks.

The program is accredited by the Accrediting Commission for Career Schools and Colleges of Technology and is licensed by the State Department of Education in PA, MD, OH, DE, and FL.

Students complete 172 hours of instruction that includes 50 hours of online instruction, which combines synchronous, instructor-led classes using Zoom and asynchronous online training modules. Students meet for an additional 10 hours at LCCC's main campus for face-to-face classroom training. In addition, students complete their required 110 hours of road/range work and a two-hour test session with LCCC's third party state examiners. Module One covers the basic operation of a CMV. It uses visual aids and handouts with instructor lectures using the PA Commercial Driver's Manual along with the Career Publishing Textbook. Modules Two and Three run simultaneously. The modules combine driving practice on LCCC's driving range as well as on-the-road experience. Throughout the course, students learn basic skills such as straight line backing, alley docking, situational backing techniques, and driver inspection reporting. In Module Three, students must demonstrate safe driving practices in preparation for their Class A CDL Road Skills Test. All FMCSA entry-level driver training requirements are reflected in curriculum components.

The student's range and road skills are thoroughly tested prior to taking the Class A CDL test. To take the CDL tests, students must score 80% or higher on the pre-test. Those students who do not meet that standard are given remediation.

Veterans, active service members, reservists and National Guard members enrolled during fall 2021 numbered 200 strong. An additional 260 spouses and dependents of veterans are also identified among LCCC's students. Veterans and active military personnel are a vital part of LCCC's campus community. The College is recognized on the Military Friendly Schools list, which honors educational institutions that most effectively serve America's military service members, veterans, and spouses. In addition to that distinction, LCCC has earned the Guard-Friendly School designation from the Pennsylvania National Guard Associations. LCCC has formed well-established partnerships with the CareerLink Veterans Employment Representatives and numerous other community agencies that serve veterans in Lehigh, Carbon, and Schuylkill counties.

As a college, LCCC values equity and embraces diverse backgrounds and viewpoints by providing inclusive experiences. With 28% (fall 2021) of the student population identifying as Hispanic, LCCC is a federally

designated Hispanic Serving Institution. A strategic committee related to diversity, equity, and inclusion is charged to develop, research, and plan specific initiatives aimed at raising awareness, implementing strategies, updating policies, and holding events that are related to the changing needs of an increasingly diverse college community. LCCC's campus includes designated "safe-spaces" and provides information sessions for students, professional development for staff, and other resources that support traditionally marginalized students

### Notification to Beneficiaries/Participants

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

For the beneficiaries' consideration, LCCC is providing:

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

LCCC will include the Public Notice of Title VI Program Rights on our website at [www.lccc.edu](http://www.lccc.edu). In addition, the Public Notice of Title VI Program Rights will also be posted in the Department of Transportation Technologies where training activity and services are conducted.

### Sub-Recipient Compliance Reports

LCCC does not intend to sub-award FMCSA funds.

### Training

LCCC has assigned the responsibility for Title VI and nondiscrimination program compliance regarding FMCSA program activities and services to the Director of Human Resources and Title IX/Equity Coordinator. That person has reviewed the FMCSA-related responsibilities assigned to the project staff and the Title VI Officer. The staff and Title VI Officer have received a copy of the FMCSA Basic Title VI Program Training. Training is conducted annually by LCCC Human Resources, LCCC's School of Workforce, Community Engagement, and Technical Education, and/or LCCC's CDL Director using the Title VI Program Policy Statement and other program information, and routine training is conducted via facilitated training utilizing a power point presentation. 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 LCCC Title VI Program and have received appropriate training.

### Access to Records

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

## Complaint Disposition Process

LCCC is committed to a policy of nondiscrimination in the conduct of its business, including its Title VI Program responsibilities. No person is excluded from participating in or denied the benefits of its services, programs or activities receiving federal financial assistance on the basis of race, color, sex, age, national origin, income status, limited English proficiency (LEP) or disability.

All reports of discrimination, harassment, and/or retaliation shall be promptly made to the Title VI Officer. The Director of Human Resources/Title IX/Equity Coordinator serves as the Title VI Officer and oversees implementation of the College's Policy on Discrimination, Harassment, and Sexual Misconduct and may be reached via (610) 799-1107.

All College employees who are aware of or witness discrimination, harassment, sexual misconduct, or retaliation are required to promptly report to the Title VI Officer or a Title VI Deputy Coordinator. Any stakeholder who is aware of or who witnesses discrimination or retaliation is encouraged to promptly report to the Title VI Officer or a Title VI Deputy Coordinator. All initial contacts will be treated with the maximum possible privacy: specific information on any complaint received by any party will be reported to the Title VI Officer, but, subject to the College's obligation to investigate and redress violations, every reasonable effort will be made to maintain the privacy of those initiating a report of a complaint. In all cases, the College will give consideration to the complainant with respect to how the complaint is pursued but reserves the right, when necessary to protect the community, to investigate and pursue a resolution when an alleged victim chooses not to initiate or participate in a formal complaint.

Individuals who wish to file a complaint of discrimination under the College's Title VI Policy are encouraged to speak to College officials, such as the Title VI Officer or Deputy Coordinators, to make formal reports. Complainants have the right, and can expect, to have complaints taken seriously by the College when formally reported and to have those incidents investigated and properly resolved through these procedures. Formal reporting still affords privacy to the reporter and only a small group of officials who need to know will be told. Information will be shared as necessary with investigator(s), witnesses, the respondent, and a hearing board if deemed appropriate. The number of people with this knowledge will be kept as few as reasonably possible to preserve a complainant's rights and privacy.

The College will follow up on and investigate such reports. The individual making the report is encouraged to provide as much detailed information as possible to allow the Title VI Officer or Deputy Coordinators to investigate and respond as appropriate. The College may be limited in its ability to investigate an anonymous or third party report unless sufficient information is provided.

All complaints will be investigated promptly. Listed below is the process for disposition of a complaint under the College's Title VI Policy:

1. Any person who believes he or she has been subjected to discrimination under Title VI may file a complaint of discrimination as described hereinabove.
2. In instances where additional information is needed, the Title VI Officer or a Deputy Coordinator will contact the complainant. 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 LCCC and other external entities may delay the timing of the complaint resolution.

The LCCC Title VI Officer 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 upon request.

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

LCCC's Title VI Program has not been audited and is not operating under any corrective action plan.

### Community Participation Process

This Section is not applicable to Lehigh Carbon Community College.

### Commercial Motor Vehicle Inspection Selection & Unbiased Enforcement Policies

This Section is not applicable to Lehigh Carbon Community College as the College does not conduct enforcement activities.

**Exhibit B****Lehigh Carbon Community College****Public Notice of Title VI Program Rights**

Lehigh Carbon Community College (LCCC) gives public notice of its policy to uphold and ensure full compliance with the non-discrimination requirements of Title VI of the Civil Rights Act of 1964 and related non-discrimination authorities. Title VI and related non-discrimination authorities stipulate that no person in the United States of America shall on the grounds of race, color, national origin, sex, age, disability, income level or limited English proficiency be excluded from the participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving federal financial assistance.

Any person who desires more information regarding LCCC's Title VI Program, contact its Title VI Coordinator at (610) 799-1107.

Any person who believes they have, individually or as a member of any specific class of persons, been subjected to discrimination on the basis of race, color, national origin, sex, age, disability, income level or limited English proficiency has the right to file a formal complaint. Any such complaint must be in writing and submitted within 180 days following the date of the alleged occurrence to:

Title VI Officer  
Lehigh Carbon Community College  
4525 Education Park Drive  
Schnecksville, PA 18078  
Phone: 610-799-1107  
Email: [dwilliams@lccc.edu](mailto:dwilliams@lccc.edu)