

# **Shores of Hope of the Greater Sacramento Area, Inc.**

## **TITLE VI PROGRAM**

**Developed: August 18, 2014**  
**Approved by Shores of Hope of the Greater Sacramento  
Area, Inc. Board of Directors:**

**110 Sixth Street**  
**West Sacramento, CA 95605**  
[sergeishkurkin@shoresofhope.org](mailto:sergeishkurkin@shoresofhope.org)  
**www.shoresofhope.org**

### INTRODUCTION

This document was prepared by Shores of Hope of the Greater Sacramento Area to comply with Title VI of the Civil Rights Act of 1964, including new provisions detailed in U.S. Department of Transportation's FTA Circular 4702.1B, "Title VI Requirement and Guidelines for Federal Transit Administration Recipients."

## Table of Contents

Title VI Notice to the Public	Pg. 4
List of Locations Where Title VI Notice Is Posted	Pg. 6
Title VI Complaint Procedures	Pg. 7
Title VI Complaint Form	Pg. 8
List of Transit-Related Title VI Investigations, Complaints, and Lawsuits	Pg. 10
Public Participation Plan	Pg. 11
Summary of Outreach Efforts Made Since 2009 Title VI Submission	Pg. 12
Language Assistance Plan	Pg. 14
Table Depicting the Membership of Non-Elected Committees and Councils	Pg. 23
Title VI Equity Analysis	Pg. 23
Board of Directors Approval of Title VI Program	Pg. 24

## Shores of Hope Title VI Notice to the Public

### Notifying the Public of Rights Under Title VI

#### **Shores of Hope of the Greater Sacramento Area, Inc •**

Shores of Hope operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with Shores of Hope

- For more information on Shores of Hope civil rights program, and the procedures to file a complaint, contact Sergei Shkurkin 916-372-0200 Ext 1030 here, or visit our administrative office at 110 Sixth Street. For more information, visit [www.shoresofhope.org](http://www.shoresofhope.org).
- A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590
- If information is needed in another language, contact 916-372-0200 Ext 1030

Notificar al público de los derechos bajo el título VI  
**Shores of Hope of the Greater Sacramento**

**Area, Inc** opera sus programas y servicios sin respecto a

raza, color y origen nacional con arreglo al título VI de la Civil  
Ley de derechos. Cualquier persona que cree que él o ella ha sido agraviado por  
cualquier práctica discriminatoria ilegal bajo el título VI puede presentar una queja con  
Shores of Hope

- Para obtener más información sobre el programa derechos civiles capaz de industrias y el  
procedimientos para presentar una queja, llame al (559) 651-8150, o visite nuestra oficina  
administrativa en 110 Sixth Street West Sacramento, 95605 Para más información  
información, visite [www.shoresofhope.org](http://www.shoresofhope.org)
- Un demandante puede presentar una queja directamente con el Federal Transit  
Administration por archivar una queja con la Office of Civil Rights,  
Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR,  
1200 New Jersey Ave., SE, Washington, DC 20590
- Si se necesita información en otro idioma, contacte al 916-372-0200

**List of Locations Where Title VI Notice Is Posted**  
**Shores of Hope of the Greater Sacramento Area, Inc** notice  
to the public is currently posted at the following locations:

Location Name	Address	City
2008 Ford Braun	110 Sixth Street	West Sacramento
2010 StarCraft	110 Sixth Street	West Sacramento
2011 Ford E-450	110 Sixth Street	West Sacramento
2006 Ford	110 Sixth Street	West Sacramento
2013 Dodge Amerivan	110 Sixth Street	West Sacramento
2016 Dodge BraunAbility	110 Sixth Street	West Sacramento
Office, Reception Area and Meeting Rooms	110 Sixth Street	West Sacramento

The Title VI notice and program information is also provided on Shores of Hope website at [www.shoresofhope.org](http://www.shoresofhope.org)

## **Title VI Complaint Procedures**

As a recipient of federal dollars, Shores of Hope is required to comply with Title VI of the Civil Rights Act of 1964 and ensure that services and benefits are provided on a non-discriminatory basis. Shores of Hope has in place a Title VI Complaint Procedure, which outlines a process for local disposition of Title VI complaints and is consistent with guidelines found in the Federal Transit Administration Circular 4702.1B, dated October 1, 2012.

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by Shores of Hope may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form. Shores of Hope investigates complaints received no more than 180 days after the alleged incident. Shores of Hope will only process complaints that are complete.

Within 10 business days of receiving the complaint, Shores of Hope will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office. Shores of Hope has 30 days to investigate the complaint. The complainant will be notified in writing of the cause to any planned extension to the 30-day rule.

If more information is needed to resolve the case, Shores of Hope may contact the complainant. The complainant has 10 business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within 10 business days Shores of Hope administratively close the case.

A case can be administratively closed also if the complainant no longer wishes to pursue their case. After the investigator reviews the complaint, she/he will issue one of two letters to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. An LOF 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. If the complainant wishes to appeal the decision, she/he has 10 business days after the date of the letter or the LOF to do so.

A person may also file a complaint directly with the Federal Transit Administration, at FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.

## Shores of Hope Title VI Complaint Form

### COMPLAINT FORM

<b>Section I: Please write legibly</b>		
1. Name:		
2. Address:		
3. Telephone:	3.a. Secondary Phone (Optional):	
4. Email Address:		
5. Accessible Format Requirements?	<input type="checkbox"/> Large Print	<input type="checkbox"/> Audio Tape
	<input type="checkbox"/> TDD	<input type="checkbox"/> Other
<b>Section II:</b>		
6. Are you filing this complaint on your own behalf?	YES*	NO
*If you answered "yes" to #6, go to Section III.		
7. If you answered "no" to #6, what is the name of the person for whom you are filing this complaint? Name:		
8. What is your relationship with this individual:		
9. Please explain why you have filed for a third party:		
10. Please confirm that you have obtained permission of the aggrieved party to file on their behalf.	YES	NO
<b>Section III:</b>		
11. I believe the discrimination I experienced was based on (check all that apply):		
<input type="checkbox"/> Race	<input type="checkbox"/> Color	<input type="checkbox"/> National Origin
12. Date of alleged discrimination: (mm/dd/yyyy)		
13. 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 attach additional sheets of paper.		

## Shores of Hope Title VI Complaint Form, Page 2

### COMPLAINT FORM

<b>Section IV:</b>		
14. Have you previously filed a Title VI complaint with Shores of Hope?	YES	NO
<b>Section V:</b>		
15. Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court? <input type="checkbox"/> YES* <input type="checkbox"/> NO If yes, check all that apply: <input type="checkbox"/> Federal Agency _____ <input type="checkbox"/> State Agency _____ <input type="checkbox"/> Federal Court _____ <input type="checkbox"/> Local Agency _____ <input type="checkbox"/> State Court _____		
16. If you answered "yes" to #15, provide information about a contact person at the agency/court where the complaint was filed.		
Name:		
Title:		
Agency:		
Address:		
Telephone:		Email:
<b>Section VI:</b>		
Name of Transit Agency complaint is against:		
Contact Person:		
Telephone:		

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

Signature and date are required below to complete form:

Signature \_\_\_\_\_ Date \_\_\_\_\_

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

Shores of Hope, Title VI Coordinator  
 110 Sixth Street  
 West Sacramento, CA 94605

## Titulo VI Procedimiento de Queja

Como un receptor de dólares federales, Shores of Hope. tiene que cumplir con lo dispuesto en el Título VI de la ley de los derechos civiles de 1964 y asegúrese de que los servicios y los beneficios se proporcionen sobre una base no discriminatoria. Shores of Hope. ha puesto en marcha un procedimiento de queja Título VI, que emboza un proceso de disposición local de quejas del Título VI y es consistente con las pautas de Administración Federal de Transito Circular 4702.1B, de Octubre 1, 2012.

Cualquier persona que cree que ha sido objeto de discriminación por motivos de raza, color, u origen nacional por Shores of Hope. puede presentar al Título VI su denuncia. Shores of Hope. investiga las quejas no mas de 180 días después del incidente. Shores of Hope. solo tramitara las quejas que están completas.

En un periodo de 10 días de haber recibido la demanda Shores of Hope. la revisara para determinar si nuestra oficina tiene la jurisdicción. El autor de la queja, recibirá un acuse de recibo informándole al denunciante que será notificado por escrito si el caso de él/ella el será investigado por nuestra oficina Shores of Hope. tiene 30 días para investigar la queja.

Si necesita mas información para resolver el caso, Shores of Hope. puede contactar al autor de la queja. El autor de la queja tiene 10 días de la fecha que recibió la carta para solicitar un investigador que sea asignado al caso.

El caso se puede cerrar también si el autor de la queja no desea proseguir con el caso. Después de que el investigador analice la queja, el / ella emitirá una de las dos cartas a la denunciante.

## FORMA DE QUEJA

Seccion I: <i>Escribir en forma legible</i>		
1. Nombre:		
2. Direccion:		
3. Telefono:	3.a. Telefono secundario( <i>opcional</i> ):	
4. Direccion de correo electronico:		
5. Reuistos de forma accesible?	<input type="checkbox"/> Impresion grande	<input type="checkbox"/> Cinta de audio
	<input type="checkbox"/> TDD	<input type="checkbox"/> Otros
Seccion II:		
6. Esta presentando esta queja en su propio nombre?	Si	No
*Si usted contesto "Si" to #6, vaya a la Seccion III.		
7. If you answered "no" to #6, what is the name of the person for whom you are filing this complaint? Name:		
8. Cual es su relacion con este individuo:		
9. Por favor, explique por que han presentado para una tercera parte:		
10. Por favor, confirme que ha obtenido el permiso de la parte agraviada en el archivo en su nombre.	Si	No
Seccion III:		
11. Creo que la discriminacion que he experimentado fue basado en ( <i>marqu todas las que correspondan</i> ):		
<input type="checkbox"/> Raza	<input type="checkbox"/> Color	<input type="checkbox"/> Origin nacional
12. Fecha de supuesta discriminacion: ( <i>mm/dd/aaaa</i> )		
13. Explica lo mas claramente posible lo que ocurrio y por que usted cree que son objeto discriminacion. Describir todas las personas que han participado. Incluir el nombre y la informacion de contacto de la(s) persona(s) que discrimina contra usted (si se conoce), asi como los nombres y la informacion de contacto de los testigos. Si se necesita mas espacio, por favor adjunte hojas adicionales de papel.		

<b>Seccion IV:</b>		
14. 14. Anteriormente ha presentado un Titulo VI denuncia con la Shores of Hope.	Si	No
<b>Seccion V:</b>		
15. Ha presentado esta queja con cualquier otro local, estado o federal, o con cualquier Federal o Estado?		
[ ] Si*    [ ] No si la respuesta es si		
Marque todo lo que aplica		
[ ] Agencia Federal _____	[ ] Agencia Estatal _____	
[ ] Federal Tribunal _____	[ ] Agencia Local _____	
[ ] Tribunal Estatal _____		
16. Si usted contesto "si" a la posicion #15, proporcionan informacion acerca de una persona de contacto en la agencia/tribunal donde se presento la denuncia.		
Nombre:		
Titulo:		
Organismo:		
Direccion:		
Telefono:		Correo electronico:
<b>Seccion VI:</b>		
Nombre de organismo Transito denuncia es contra:		
Persona de contacto:		
Telefono:		

## List of Transit-Related Title VI Investigations, Complaints, and Lawsuits

Shores of Hope has not been involved in any transportation-related Title VI investigations, lawsuits or complaints.

### Shores of Hope List of Investigations, Lawsuits and Complaints

Type of Process	Date	Summary (including basis of complaint)	Status	Action(s) Taken
Investigations				
1. None				
2.				
Lawsuits				
1. None				
2.				
Complaints				
1. None				
2.				

## Public Participation Plan

### ***About Shores of Hope***

Shores of Hope is a non-profit 501 c (3) organization that provides transportation to adults with disabilities. Services for the program are purchased by Alta Regional Centers or (other organizations serving disabled) that refer eligible consumers to enroll in the program. The program does not serve the general public but rather a limited population of adults with disabilities that is first served by Alta Regional Center and is then referred to the Shores of Hope. As such, the program works in conjunction with Alta Regional Center and other agencies to achieve various outreach opportunities.

Alta Regional Center participants have developmental disabilities and typically range in the moderate to low functioning level. While it is beyond the scope of this program to measure specific literacy skills, participants generally require a high level of supervision and **have little to no literacy skills**. Generally, any **documents presented to participants are translated orally** due to the level of disability. Additionally, participants have not mastered basic work skills and need assistance. Currently, 100% of participants receive SSI benefits, which are largely determined by limited resources and income.

The programs we transport to includes training in the areas of social skills, self-advocacy, vocational skills, personal health and safety, technology, vocational skills, cognitive skills, community integration and recreation. Our program provides transportation to as many clients as Alta Regional Center requests. Given the relatively small size of the program and its limited exposure, the scope and provision of transportation service would have insignificant impact on the general public and minority and low-income populations in the geographic area. This agency, however, does maintain systems to gather stakeholder input regarding agency services and conducts public relations and outreach activities in order to create meaningful opportunities for public engagement as part of our other program efforts as outlined below.

### ***Purposes of this Plan***

Public participation is the process through which stakeholders can partake directly in agency decision-making, and express their concerns, desires, and values. It is the part of the mission of this agency to "improve the lives of people with disabilities by creating opportunities to maximize their independence." At every opportunity through prescribed methods the agency will solicit input from stakeholders in order to best support persons served without creating disproportionately high and adverse human health or environmental effects on minority and/or low-income populations.

### ***Summary of Outreach Efforts***

The following is a summary of outreach efforts conducted by Shores of Hope as they relate to Title VI requirements under the Public Participation Plan. Many of our activities are conducted

in partnership or ad hoc outreach with other service organizations and non-profit agencies within the community. This is in no way a complete list but rather documents the agency's outreach efforts as they relate specifically to minority and low-income populations.

**Board Meetings Open to the Public**

Shores of Hope Monthly Board meetings are open to the public and announced on the agency's website.

**Volunteer Opportunities**

Shores of Hope provides meaningful volunteer opportunities for community members through their weekly food distribution and job training programs. These volunteers in turn inform the community about the services that are available.

**Services to Local Non-Profit Housing**

Shores of Hope has an agreement with the West Sacramento Housing Development Corporation that has over 200 units of affordable housing within a five-block area of our center, to provide social services to the residents of those units. Leaflets go out every week advertising our job training, GED, and women's support and 12 step meetings.

**Yolo County Continuum of Care**

Shores of Hope is a founding and executive committee member for a coalition of agencies focusing on the homeless and homeless disabled populations.

**Slavic Chamber of Commerce**

Shores of Hope is a member of the Slavic of Commerce providing networking and support to emerging Slavic businesses.

## Language Assistance Plan

### Overview

The first section in this document describes the purpose of the Language Assistance Plan (LAP). The second section in this document provides the four-factor Limited English Proficient (LEP) analysis (as outlined by the Department of Transportation (DOT) used to identify LEP needs and assistance measures. The four-factor LEP analysis includes:

- **Factor 1:** The number or proportion of LEP persons in the service area who may be served or are likely to encounter the Life Skills Learning Center program, activity or service.
- **Factor 2:** The frequency with which LEP persons come in contact with the Life Skills Learning Center program, activity or service.
- **Factor 3:** The nature and importance of programs, activities or services provided by Life Skills Learning Center to the LEP population.
- **Factor 4:** The resources available to Shores of Hope and overall cost to provide LEP assistance.

The third and final section discusses the implementation of the Language Assistance Plan, which includes methodologies for identifying LEP individuals, providing services, establishing policies, monitoring the LAP, and recommendations for future LAP implementations.

### *Purpose of the Language Assistance Plan*

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance. One critical concern addressed by Title VI is the language barrier that Limited English Proficiency (LEP) persons face with respect to accessing information about and using transit service. Transit operators must ensure that this group has adequate access to the agency's programs and activities, including public participation opportunities.

Executive Order 13166, titled "Improving Access to Services for Persons with Limited English Proficiency," forbids funding recipients from "restricting an individual in any way in the enjoyment of any advantage or privilege enjoyed by others receiving any service, financial aid, or other benefit under the program," or from "utilize[ing] criteria or methods of administration which have the effect of subjecting individuals to discrimination because of their race, color, or national origin, or have the effect of defeating or substantially impairing accomplishment of the objectives of the program as respects to individuals of a particular race, color, or national origin."

FTA Circular 4702.1B was developed by the Federal Transit Administration (FTA) and details the administrative and reporting requirements for recipients of FTA financial assistance to comply with Title VI and related executive orders including on LEP.

The United States Department of Transportation (DOT) published guidance that directed its recipients to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for LEP customers. Shores of Hope language assistance plan (LAP) includes a four-factor analysis and implementation plan that complies with the requirements of DOT LEP guidance.

## Four Factor Analysis

### **Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by Shores of Hope.**

**Shores of Hope** hold a unique position in regard to meeting the Title VI requirements. As a sub-recipient of FTA 5310 Grant funding, the agency's focus is primarily to transport adults with disabilities where current public transit options are insufficient or do not exist. Eligible program participants or "riders" must be referred into the program by Alta Regional Center. As such, **Shores of Hope** does not offer transportation to the general public other than in situations involving a coordinated plan with other entities. Therefore, an analysis of public demographic data in Yolo County does not represent actual populations served by this program but is offered for comparison purposes only.

There are two sources of data that most accurately represent LEP persons likely to be served by the program. The Alta Regional Center Purchase of Service Expenditure and Demographic Data for fiscal year 2012/2013 shows Alta Regional Center purchase of service (POS) authorizations, expenditures and utilization by different demographic categories including language. **Shores of Hope** receives case histories of each program participant and maintains a database of information. A historical analysis of this database in regard to language proficiency of all past and present participants will reflect actual proportions of LEP persons served.

### **American Community Survey**

The U.S. Census Bureau 2008-2012 American Community Survey (ACS) Language Spoken at Home by the Ability to Speak English estimates that of the 204,593 Yolo County residents 34% or 69,561 speak a language other than English at home. \* Information on Russian, Hmong, Mien, Punjabi and Pashtun that speak English less than well not from American Community service but community based estimates.

<b>Yolo County, California</b>	<b>Estimate</b>	<b>Percentage</b>
<b>Total:</b>	<b>204,593</b>	<b>100%</b>
<b>Speak only English</b>	<b>130,393</b>	<b>66%</b>
<b>Spanish</b>	<b>42,351</b>	<b>21%</b>
<b>Russian *</b>	<b>7,000</b>	<b>3%</b>
<b>Hmong, Mien, Punjabi, Pashtun *</b>	<b>20,459</b>	<b>10%</b>

### **..... Regional Center (....RC) Expenditures**

The Alta RC Purchase of Service and Demographic Data Report for Fiscal Year 2012/2013 identifies total annual expenditures and authorized services purchased. The report shows expenditures for services by primary language spoken but does not ascertain whether English is also spoken "very well" or less than "very well". As indicated in the Yolo County analysis above, Spanish is consistently the primary language for LEP populations. The report further breaks down by age group for ages 22 and older. Shores of Hope would be included in this category as a provider of services that are purchased by Alta RC.

The report indicates that authorized services for ages 22 and older in FY 2012-2013 totaled \$136,650,740. Of that total, \$118,487,160 (**86.7%**) was spent on English speaking consumers and \$14,065,809 (**10.3%**) was spent on Spanish speaking consumers. Expenditures for other languages totaled less than 1%.

<b>Authorized Services by Language</b>	<b>Amount</b>	<b>Percent</b>
<b>Total Authorized Services Purchased</b>	<b>\$136,650,740</b>	<b>100%</b>
<b>English</b>	<b>\$118,487,160</b>	<b>86.7%</b>
<b>Spanish</b>	<b>\$14,065,809</b>	<b>10.3%</b>

By comparison, the Shore of Hope revenue of \$113,207 received from Alta RC in FY 2012-2013 amounts to approximately **0.00008%** of the total Alta RC authorized services purchased.

Additionally, consumers of this program who speak English or any other language less than "very well" typically have developmental disabilities that cause barriers to speech or other forms of communication. **Limited English Proficiency is not present in this population solely due to a language barrier.** Thus, translation of vital documents into a native language is generally ineffective. In fact, the majority of the consumers we transport do not speak at all.

An examination of consumers who have exited the program reveals that consumers exited primarily for reasons such as ineligibility because of their level of disability, successful transition to higher programs or other factors such as insufficient or non-existent transportation options. There were no clients that were underserved or exited the program due to language barriers.

**Factor 2: The frequency with which LEP persons come into contact with the program.**

Shores of Hope has served most of these Alta Regional Clients for years, so we know the families quite well and communicate with them regularly. We have not needed interpreter services in most cases. We do have staff who speak Spanish and Russian and have been able to talk to families in both of those languages. Currently we have one family that requires to be spoken to in Russian.

**Factor 3: The nature and importance of the program, activity, or service provided by the program to people's lives.**

The primary purpose of the Shores of Hope transportation program is to provide transportation to individuals with disabilities. Currently, Shores of Hope serves 30 consumers. The length of time an individual is typically enrolled in the program can range from a few months to many years. Consumers are not required to "graduate" and may remain in the program as long as their needs can continue to be met.

While, the Shores of Hope program is relatively small and is not an "essential" program, it does create opportunities that can enhance the quality of life for adults with disabilities.

**Factor 4: The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach.**

The Shores of Hope operating budget does not have a specific line item for providing language access and outreach. We do have funding for other outreach programs that are utilized to generally publicize our services in the community. We had a volunteer do a Russian version of our website that assisted in outreach to that community. Our staff includes Spanish and Russian speaking members. As members of the community locally, there is a natural flow of information about our services from those staff members.

**SUMMARY**

The results of the Four Factor Analysis can be summarized with the following points:

- It is likely that Alta RC provided funding for **only 4 consumers** that spoke Spanish as a primary language in the 2012-2013 fiscal year. English proficiency of those four is unknown.
- No "true" LEP persons have been served by the program in the last 14 years.
- Language proficiency is primarily affected by disability rather than a language barrier alone.
- No consumers were underserved or exited the program due to language barriers.
- Surveyed Agency staff reported 3-4 LEP phone calls per week.
- Surveyed staff reported **never** receiving LEP phone calls.
- Five family members of consumers were LEP in the last 14 years.
- Provision of transit is not considered an "essential" service but is a component of the Shores of Hope program.
- Shores of Hope does not have an LEP specific budget line.
- Shores of Hope spends less than \$1000 per year on all outreach efforts.

## ***Language Assistance Implementation Plan***

### **Methodologies**

#### **Identifying LEP Individuals**

As evidenced by the Four Factor Analysis, very few "true" LEP individuals are referred to the Shores of Hope program. The predominant minority language in the region is Spanish as well as Russian. The consumers that are primarily served by the Shores of Hope program have disabilities that affect language proficiency rather than a language barrier alone.

While there is a substantial minority population in the region, according to the Alta RC Purchase of Service and Demographic Data Report, the funds allocated to the Hispanic language population is minimal and even less to Russian. In the 26-year history of the program there were very few consumers served who were LEP due strictly to a language barrier. The agency does, however, have systems in place to provide access to minority populations.

#### **Providing Services**

While the agency does not currently have an on-going need for professional translation services, on-site agency staff who are fluent in Spanish and Russian provide translation services at both facilities as needed. Documents that are offered in Spanish and Russian include:

- Title VI Notice to the Public
- Title VI Complaint Form
- Title VI Complaint Procedures
- Consumer Program Handbook including ABLE Grievance Policy
- Agency website Title VI information

Other documents can be translated to Spanish and Russian orally as appropriate. Due to the low literacy rate of consumers in the Shores of Hope program, most documents are translated orally.

#### **Communicating Availability of Language Assistance**

Individuals who are referred to Shores of Hope programs for services are assigned a Case Service Counselor who provides one-on-one guidance and program planning. Case Service Counselors can offer Spanish and Russian translation services as needed. Agency reception staff can also offer translation services to guests and consumers' family members as appropriate.

The new agency website will also contain summary information in Spanish and Russian with instructions on how to obtain more information.

#### **Monitoring**

Shores of Hope maintains an Agency Accessibility Plan which is designed to minimize barriers that are created by architectural factors, environmental factors, attitudinal factors, financial and employment barriers and communication barriers such as language. This plan is reviewed and updated annually.

There is a monthly meeting for our drivers where we provide training in accessibility and cultural diversity as well as monitor performance in these areas. We hire an outside firm to provide first aid and CPR training on an annual basis. This is including our child development and our transportation staff.

Agency name Annual Report is analyzed for trends and patterns that indicate a need for additional services. This report includes ethnicity and can be used as a guide to determine the need for additional translation services.

Satisfaction Surveys for the program offer an opportunity for consumers and their care givers to provide input or suggest additional services. To date, translation services have not been requested. The Title VI Plan will also be evaluated and updated every three years.

### **Employee Training**

Shores of Hope conducts regular In-Service training for staff that can include Customer Service and Language Assistance training.

### ***Safe Harbor Provision***

The Federal Transit Authority Circular 4702.1B states:

*"DOT has adopted DOJ's Safe Harbor Provision, which outlines circumstances that can provide a "safe harbor" for recipients regarding translation of written materials for LEP populations. The Safe Harbor Provision stipulates that, if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with the recipient's written translation obligations. Translation of non-vital documents, if needed, can be provided orally. If there are fewer than 50 persons in a language group that reaches the five percent (5%) trigger, the recipient is not required to translate vital written materials but should provide written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost.*

*These safe harbor provisions apply to the translation of written documents only. They do not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable. A recipient may determine, based on the Four Factor Analysis, that even though a language group meets the threshold specified by the Safe Harbor Provision, written translation may not be an effective means to provide language assistance measures. For example, a recipient may determine that a large number of persons in that language group have low literacy skills in their native language and therefore require oral interpretation. In such cases, background documentation regarding the determination shall be provided to FTA in the Title VI Program."*

As previously stated, the Shores of Hope program serves individuals with moderate to severe developmental disabilities who require a high level of supervision. As such, the majority of consumers have very limited literacy skills and are unable to read or write. Program documents are generally interpreted orally by Case Service Counselors.

## **Membership of Non-Elected Committees and Councils**

Shores of Hope does not have a non-elected transit related advisory council at this time.

## **Title VI Equity Analysis**

Shores of Hope does not have transit related facilities.

## **Board of Directors Approval of Shores of Hope Title VI Program**

### **A RESOLUTION OF THE Shores of Hope BOARD OF DIRECTORS AUTHORIZING THE TITLE VI COMPLIANCE PLAN FOR THE AGENCY.**

WHEREAS, Shores of Hope desires to comply with Title VI of the Civil Rights Act of 1964, including new provisions detailed in U.S. Department of Transportation's FTA Circular 4702.1B, "Title VI Requirement and Guidelines for Federal Transit Administration Recipients,"

WHEREAS, the Board of Directors wishes to authorize approval of the compliance plan developed by staff to comply with necessary provisions of the Civil Rights Act,

NOW, THEREFORE BE IT RESOLVED, by the Board of Directors of Shores of Hope as follows:

1. The Executive Director is authorized to implement the components of the plan in order to meet Federal requirements.
2. The Executive Director is authorized to implement policies that may be necessary to comply with subsequent revisions or interpretations to the Civil Rights Act.

PASSED AND ADOPTED by the Board of Directors of Shores of Hope State of California, on this 20th day of August , 2014.

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**President of the Board**