

# **Villa Esperanza Services**

## **TITLE VI PROGRAM**

**Developed: 6/27/14**

**2060 East Villa Street, Pasadena, CA 91107**

**626-449-2919 Kelly White (CEO)**

**Kwhite@villaesperanzaservices.org**

**INTRODUCTION**

This document was prepared by Villa Esperanza Services 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	P. 3
Title VI Notice to the Public (Spanish)	P. 4
List of Locations Where Title VI Notice Is Posted	P. 5
Title VI Complaint Procedures	P. 6
Title VI Complaint Form	P. 7-8
Title VI Complaint Procedures Spanish	P. 9
Title VI Complaint Form Spanish	P.10-11
List of Transit-Related Title VI Investigations, Complaints, and Lawsuits	P. 12
Public Participation Plan	P. 13
Summary of Outreach Efforts Made Since 2009 Title VI Submission	P. 14-15
Language Assistance Plan	P. 16-22
Table Depicting the Membership of Non-Elected Committees And Councils	P. 23
Title VI Equity Analysis	P. 23
Board of Directors Approval of Title VI Program	P. 24

**Villa Esperanza Services Title VI Notice to the Public**

Notifying the Public of Rights Under Title VI

**Villa Esperanza Services**

- Villa Esperanza Services 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 Villa Esperanza Services.
- For more information on Villa Esperanza Services civil rights program, and the procedures to file a complaint, contact Villa Esperanza Services 626-449-2919, or visit our administrative office at 2060 East Villa Street, Pasadena, Ca 91107. For more information, visit Villa Esperanza Services.
  - 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 626-449-2919.

Notificar al público de los derechos bajo el título VI  
Villa Esperanza Services

- Villa Esperanza Services 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  
Villa Esperanza Services
- 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 2060 East Villa Street, Pasadena, Ca 91107. Para más información información, visite [Villaesperanzaservices.org](http://Villaesperanzaservices.org).
- Un demandante puede presentar una queja directamente con el Federal Transita Administración por archivar una queja con la Office of Civil Rights, Atención: 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 626-449-2919.

**List of Locations Where Title VI Notice Is Posted**

Villa Esperanza Services notice to the public is currently posted at the following locations:

Location Name	Address	City
Maintenance/Transportation Department	2088 East Villa Street	Pasadena
Villa Esperanza Services Adult Day Program	1757 North Lake Ave	Pasadena
Dimensions Adult Day Program	2031 East Villa Street	Pasadena
In Each Cal Trans Vehicle	2088 East Villa Street	Pasadena

The Title VI notice and program information is also provided on Villa Esperanza Services website at: [www.villaesperanzaservices.org](http://www.villaesperanzaservices.org)

## **Title VI Complaint Procedures**

As a recipient of federal dollars, Villa Esperanza Services 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. Villa Esperanza Services 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 Villa Esperanza Services may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form. Villa Esperanza Services investigates complaints received no more than 180 days after the alleged incident. Villa Esperanza Services will only process complaints that are complete.

Within 10 business days of receiving the complaint, Villa Esperanza Services 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. Villa Esperanza Services 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, Villa Esperanza Services 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 Villa Esperanza Services can 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.

Villa Esperanza Services 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.		

Villa Esperanza Services Title VI Complaint Form, Page 2

**COMPLAINT FORM**

<b>Section IV:</b>		
14. Have you previously filed a Title VI complaint with Villa Esperanza Services?	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:

Villa Esperanza Services, Title VI Coordinator  
 2060 East Villa Street  
 Pasadena, CA 91107



### **Titulo VI Procedimiento de Queja**

Como un receptor de dólares federales, Villa Esperanza Services tiene que cumplir con lo dispuesto en el Titulo 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. Villa Esperanza Services ha puesto en marcha un procedimiento de queja Titulo VI, que emboza un proceso de disposición local de quejas del Titulo 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 Villa Esperanza Services. puede presentar al Titulo VI su denuncia. Villa Esperanza Services investiga las quejas no mas de 180 días después del incidente. Villa Esperanza Services solo tramitara las quejas que están completas.

En un periodo de 10 días de haber recibido la demanda, Villa Esperanza Services 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. Villa Esperanza Services tiene 30 días para investigar la queja.

Si necesita mas información para resolver el caso, Villa Esperanza Services 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.

Villa Esperanza Services – Forma De Queja

<b>Seccion I: Escribir en forma legible</b>		
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
<b>Seccion II:</b>		
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
<b>Seccion III:</b>		
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.		

Villa Esperanza Services – Forma De Queja – Pagina 2

Seccion IV:		
14. 14. Anteriormente ha presentado un Titulo VI denuncia con la *****.	Si	No
Seccion V:		
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:
Seccion VI:		
Nombre de organismo Transito denuncia es contra:		
Persona de contacto:		
Telefono:		

Puede adjuntar cualquier material escrito o cualquier otra información que usted considere relevante para su queja.

Firma y fecha están obligados a continuación para completar el formulario:

Signature \_\_\_\_\_ Fecha \_\_\_\_\_

Por favor envíe este formulario en persona o por correo este formulario a la siguiente dirección:

Villa Esperanza Services, Title VI Coordinator  
 2060 East Villa Street  
 Pasadena, CA 91107

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

Villa Esperanza Services has not been involved in any transportation-related Title VI investigations, lawsuits or complaints.

**Villa Esperanza Services 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 - Villa Esperanza Services***

Villa Esperanza Services is a non-profit 501 c (3) organization that provides training and employment services to children, adults & seniors with disabilities. The agency is licensed by the State of California Health and Human Services Department of Social Services Community Care Licensing Division. Services for the program are purchased by Regional Centers and/or School districts that refer eligible individuals to enroll in the program. Regional Centers and/or School district is the sole referral agency for Villa Esperanza Services. The program does not serve the general public but rather a population of children, adults and senior with developmental disabilities that is first served by Regional Centers/School Districts and is then referred to Villa Esperanza Services. As such, the program works in conjunction with Regional Centers/School Districts and other agencies to achieve various outreach opportunities.

All of the individuals we support have developmental disabilities and typically range in the mild/moderate to severe level of functioning. 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 intellectual disability. Additionally, participants have not mastered basic work skills and are unable to earn an income. Currently, 90% of the individuals we support receive SSI benefits, which are largely determined by limited resources and income.

The programs curriculum includes training in the areas of social skills, self-advocacy, vocational skills, personal health and safety, technology, cognitive skills, community integration and recreation. The program provides limited transportation with **one** small bus to and from the program and conducts daily community integration trips with various individuals we support. Villa Esperanza Services is licensed to serve a maximum of 64 consumers. 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 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 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.

***Villa Esperanza Services - Summary of Outreach Efforts***

The following is a summary of outreach efforts conducted by Villa Esperanza Services 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**

Villa Esperanza Services monthly Board meetings are open to the public and announced on the agency's website.

**Los Angeles County Office of Emergency Services**

Villa Esperanza Services has worked in conjunction with the Los Angeles County Office of Emergency Services for the last three years in the development of the Los Angeles County Evacuation Plan. This plan specifically addresses the needs of populations at risk including disabled, minority and low-income. This partnership also includes a coordinated plan in which this agency will provide vehicles, transportation and shelter during evacuation emergencies.

**Regional Center Transition Fair**

Villa Esperanza Services participates annually in the Regional Center Transition Fairs. This event is designed to connect families of children with disabilities who are preparing to leave school and enter adulthood to service providers and training programs such as employment programs, community integration programs, and adult day programs. The event typically attracts 75-100 guests and is translated in Spanish with a live interpreter in order to reach Limited English Proficient individuals.

**Kiwanis Club**

Villa Esperanza Services maintains an on-going partnership with the Kiwanis Club to provide coordinated transportation assistance via the agency's FTA 5310 vehicle. Additionally, several members of the Villa Esperanza Services staff maintain membership with the Kiwanis Club, which serves low-income and minority populations.

**Villa Esperanza Services Annual Open House**

Villa Esperanza Services hosts an Open House and Awards Ceremony annually to recognize the achievements of both program participants and members of the community. This is a public event that is publicized with press releases to a number of various media outlets and also serves as a forum for public input. This event typically attracts 100-150 guests.

**Annual Satisfaction Surveys**

Villa Esperanza Services conducts Annual Satisfaction Surveys with program participants and stakeholders of the agency to determine level of satisfaction and gain input regarding unmet needs.

**Lions Club Presentation**

Agency staff presented a synopsis of Villa Esperanza Services in 2013 to the Lions Club, which serves low-income populations.

**Villa Esperanza Services Website**

Currently, Villa Esperanza Services posts notices and announcement on the agency's website. Additional public input can be obtained by the Title VI Complaint Form, which is available as a download in English and Spanish. The agency also maintains a Public Relations Committee that meets on a quarterly basis and sets annual marketing and outreach goals. The Committee conducts various comprehensive outreach activities throughout the year including public engagements, newsletters, open houses and press releases. Additionally, on an annual basis the agency develops a comprehensive Strategic Marketing Plan that includes Public Relations, Employee and Consumer Relations, Production and Manufacturing, New Products and Program Development. An annual In-Service training program for staff is included in this plan.

## 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 [Villa Esperanza Services](#) 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. Villa Esperanza Services 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 Villa Esperanza Services.**

Villa Esperanza Services 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 ..... As such, Villa Esperanza Services 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 Los Angeles 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 Purchase of Service Expenditure and Demographic Data for fiscal year 2012/2013 shows purchase of service (POS) authorizations, expenditures and utilization by different demographic categories including language. Villa Esperanza Services 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 5000 Los Angeles County residents, 170,000 speak Spanish at home and 82,682, or 20.6%, speak English less than "very well". All other non-English languages resulted in less than 1% of the population.

<b>Los Angeles County, California</b>	<b>Estimate</b>	<b>Percentage</b>
<b>Total:</b>	<b>400,712</b>	<b>100%</b>
<b>Speak only English</b>	<b>207,274</b>	<b>51.7%</b>
<b>Spanish</b>	<b>176,380</b>	<b>44%</b>
<b>Speak English "very well"</b>	<b>93,698</b>	<b>23.3%</b>
<b>Speak English less than "very well".</b>	<b>82,682</b>	<b>20.6%</b>

**Regional Center (RC) Expenditures**

The 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 Los Angeles 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. Villa Esperanza Services would be included in this category as a provider of services that are purchased by 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%.

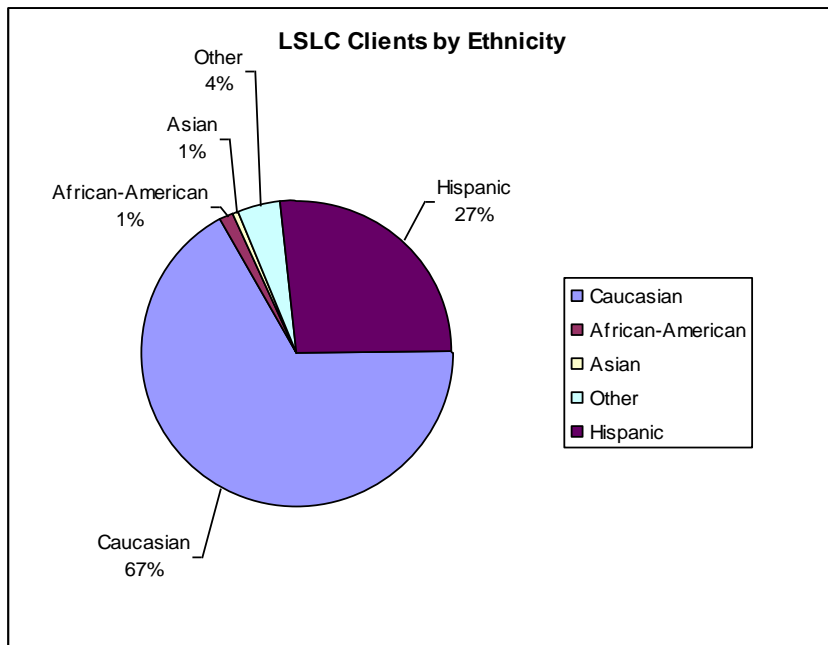
<b>Authorized Services by Language</b>	<b>Amount</b>	<b>Percent</b>
--	---------------	----------------

<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 Villa Esperanza Services revenue received from RC in FY 2012-2013 amounts to approximately **0.3%** of the total RC authorized services purchased. Theoretically, if this percentage were applied to the services purchased for Spanish speaking individuals (\$14,065,809) it would equate to the revenue necessary to provide service to only **4** Villa Esperanza Services individuals. If it is assumed that these four individuals speak Spanish as a primary language, it remains unclear how many would speak English less than "very well".

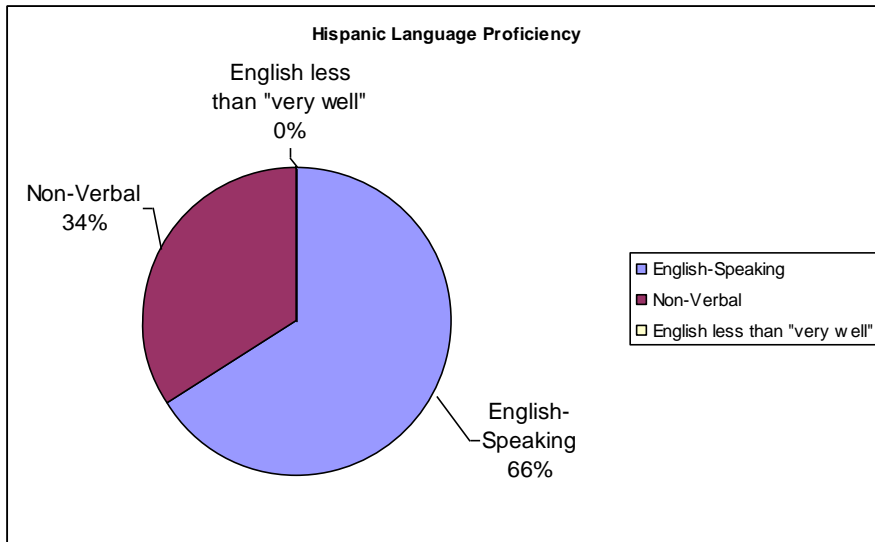
**Historical Analysis of LEP Persons Served by Life Skills Learning Center**

A final source of data to be considered to determine the number of LEP persons likely to be served by this program is a client-by-client analysis of all individuals served in the 14 year history of the program. The Villa Esperanza Services program has served a total of 141 persons including the individuals currently enrolled. Of that total, 27% are listed as Hispanic and 67% are listed as Caucasian. Other ethnicities were less than 5%.



In an analysis of the language proficiency of the Hispanic population served, **66%** spoke English "very well" and **34%** were non-verbal due to

their disability. There were **no clients** that spoke English less than "very well".



Additionally, individuals 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.

An examination of individuals who have exited the program reveals that the individual 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.**

As indicated above, historically, contact with LEP individuals has not yet occurred in this program. However, a survey of the agency's phone Transportation Coordinator indicated calls from LEP persons are received 3-4 times per week. The Transportation Coordinator indicated that these calls are primarily received from families of individuals rather than actual program participants (riders).

In a similar survey in the [Villa Esperanza Services](#) program, Transportation Coordinator revealed that they **never** receive phone calls from LEP persons and have encountered only five family members of individuals who were LEP in the 14 year history of the program.

Annual individual and care provider surveys provide an opportunity for input and suggested services. Surveys have not contained requests for translation services. Translation services are provided by agency staff as appropriate and, at times, by staff during client planning meetings. Again, the majority of translation occurs with family members, not the individuals we support.

**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 [Villa Esperanza Services](#) program is to provide training opportunities that foster personal growth for individuals with disabilities. Transportation during Community Integration training is offered daily as a part of the service in addition to limited transportation to/from the program. Annual client surveys indicate that transportation for Community Integration activities is an important part of the services offered to the individuals we support, [Villa Esperanza Services](#) serves 43 individuals. The length of time an individual is typically enrolled in the program can range from a few months to many years. The individuals we support are not required to "graduate" and may remain in the program as long as their needs can continue to be met.

While, the [Villa Esperanza Services Transportation](#) 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 [Villa Esperanza Services](#) operating budget does not have a specific line item for providing language access and outreach. Outreach expenses as they relate to LEP populations are split among several departments depending on which department is responsible for the outreach. Costs for translation of documents are minimal and has not been quantified. The majorities of larger expenses are allocated to annual Open Houses and print/email marketing. Significant outreach budget allocations for the entire agency this fiscal year include but are not limited to:

- Redesign of agency web page: \$10,000
- Ads in local publications and email blasts: \$6000
- Annual Open Houses for two facilities: \$10,500

The budget for [Villa Esperanza Services](#), which provides services through the FTA 5310 grant, is a small fraction of the agency's budget. The total annual expenditures for Life Skills Learning Center's outreach activities are less than \$1000. This includes an annual public Open House and bi-annual newsletters. Specific outreach to LEP populations has not been conducted as a reasonably significant number of LEP persons have not been served by this program, as indicated in Factor 1.

The rates for purchase of service that [Villa Esperanza Services](#) receives from .....RC as its sole source of service revenue was originally set in 1998. These rates were set with the cost-of-living index from 1998 and have not increased in the last 16 years, while the cost of living has continued to rise. In fact, rates, and subsequently the program's revenue, were reduced for a number of years by up to 4.25%, further compounding the effects of a rate system that has not grown with the economy. Several cost-cutting measures have been implemented in order to remain financially solvent, including areas such as advertising and outreach.

**SUMMARY**

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

- It is likely that .....RC provided funding for **only 4 consumers** that spoke Spanish as a primary language in the 2012-2013 fiscal years. 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 individuals 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 individuals were LEP in the last 14 years.
- Provision of transit is not considered an "essential" service but is a component of the [Villa Esperanza Services](#) program.
- Villa Esperanza Services does not have an LEP specific budget line.
- [Villa Esperanza Services](#) spends less than \$1000 per year on all outreach efforts.
- Daily revenue rate for program services is 16 years old with no cost-of-living adjustment.

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

### **Methodologies**

#### **Identifying LEP Individuals**

As evidenced by the Four Factor Analysis, very few "true" LEP individuals are referred to the [Villa Esperanza Services](#) program. The predominant minority language in the region is Spanish. The individuals that are primarily served by the [Villa Esperanza Services](#) 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 .....RC Purchase of Service and Demographic Data Report, the funds allocated to the Hispanic language population is minimal. In the 14 year history of the program there were no individuals served who LEP were 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 that are fluent in Spanish provide translation services at both facilities as needed. Documents that are offered in Spanish 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 orally as appropriate. Due to the low literacy rate of consumers in the [Villa Esperanza Services](#) program, most documents are translated orally.

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

Individuals who are referred to [Villa Esperanza Services](#) programs for services are met by the Program Case Coordinator who provides one-on-one guidance and program planning. Case Coordinator can offer Spanish translation services as needed. Transportation Coordinator can also offer translation services to guests and the individual's family members as appropriate.

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

#### **Monitoring**

[Villa Esperanza Services](#) 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.

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 clients and their family/care providers 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**

Villa Esperanza Services conducts monthly In-Service training for staff that can include Customer Service and Language Assistance training.

As a part of the Accessibility Plan, the agency encourages staff interest and education in learning to more effectively communicate with individuals served in ABLÉ's programs. The agency through its continuing education benefits program encourages staff to enroll in college classes and will reimburse tuition and books upon successful completion of the course up to \$100.

### **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 [Villa Esperanza Services](#) program serves individuals with moderate to severe developmental disabilities who require a high level of supervision. As such, the majorities of individual have very limited literacy skills and are unable to read or write. Program documents are generally interpreted orally by the Program Case Coordinator.

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

Villa Esperanza Services does not have a non-elected transit related advisory council at this time.

**Title VI Equity Analysis**

Villa Esperanza Services does not have transit related facilities.

**Board of Directors Approval of Villa Esperanza Services Title VI Program**

**A RESOLUTION OF THE Villa Esperanza Services BOARD OF DIRECTORS AUTHORIZING THE TITLE VI COMPLIANCE PLAN FOR THE AGENCY.**

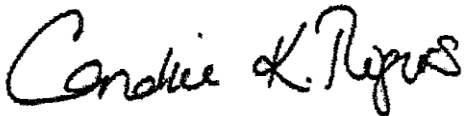
WHEREAS, Villa Esperanza Services desires to comply with Title VI of the Civil Rights Act of 1964, including new provisions detailed in U.S. Department of Transportation's FTA Circular 4702.1B, "Title VI Requirement and Guidelines for Federal Transit Administration Recipients,"

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 Villa Esperanza Services 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 Villa Esperanza Services, State of California, on this June 30<sup>th</sup>, 2014.



---

**President of the Board**

---