

HELP of Ojai, Inc.

TITLE VI PROGRAM

Developed: May 2014
Updated October 2020
Approved by HELP of Ojai, Inc.
Board of Directors

HELP of Ojai, Inc.
P. O. Box 621
111 W. Santa Ana St.
Ojai, CA 93024

INTRODUCTION

This document was prepared by HELP of Ojai, Inc. and approved by its Board of Directors 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."

HELP of Ojai, Inc. Title VI Notice to the Public

Notifying the Public of Rights under Title VI HELP of Ojai, Inc.

- HELP of Ojai, Inc. 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 HELP of Ojai, Inc.
- For more information on HELP of Ojai, Inc.'s civil rights program, and the procedures to file a complaint, contact (805) 646-5122, or visit our administrative office at 111 W. Santa Ana St., Ojai, CA For more information, visit www.helpofojai.org
- A complainant may file a complaint directly with the Ventura County Transportation Commission, Director of Transit, 950 County Square Drive, Suite 207, Ventura, CA 93003 or with the Federal Transit Administration 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 (805) 646-5122.

Notificar al público de los derechos bajo el título VI HELP of Ojai, Inc.

- HELP of Ojai, 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 HELP of Ojai, Inc.
- Para obtener más información sobre el programa derechos civiles capaz de industrias y el procedimientos para presentar una queja, llame al (805) 646-5122, o visite nuestra oficina administrativa en 111 W. Santa Ana St., Ojai, CA 93023 Para más información información, visite www.helpofojai
- Un demandante puede presentar una queja directamente con el Ventura County Transportación Comisión, Director of Transita, 950 County Square Drive, Suite 207, Ventura, CA 93003 o 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 (805) 646-5122

List of Locations Where Title VI Notice Is Posted

HELP of Ojai, Inc.'s Title VI notice to the public is currently posted at the following locations:

Location Name	Address	City
HELP of Ojai's Little House	111 W. Santa Ana St.	Ojai, CA
HELP of Ojai's Community Assistance & Valley Outreach office	108 E. Fox St.	Ojai, CA
HELP of Ojai's West Campus kitchen and administrative office	370 Baldwin Rd.	Ojai, CA
Agency 5310 Vehicles	111 W. Santa Ana St.	Ojai, CA
Website	www.helpofojai.org	

Title VI Complaint Procedures

As a recipient of federal dollars, HELP of Ojai, Inc. 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. HELP of Ojai, Inc. 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 HELP of Ojai, Inc. may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form. HELP of Ojai, Inc. investigates complaints received no more than 180 days after the alleged incident. HELP of Ojai, Inc. will only process complaints that are complete. Complaint forms can be found on our website at www.helpofojai.org.

Within 10 business days of receiving the complaint, HELP of Ojai, Inc., 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. HELP of Ojai, Inc. has 30 days to investigate the complaint. The complainant will be notified in writing of the cause of any planned extension to the 30-day rule.

If more information is needed to resolve the case, HELP of Ojai, Inc. 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 HELP of Ojai, Inc. 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.

HELP of Ojai, Inc. Title VI Complaint Form

COMPLAINT FORM

Section I: <i>Please write legibly</i>		
1. Name:		
2. Address:		
3. Telephone:	3.a. Secondary Phone <i>(Optional)</i> :	
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
Section II:		
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
Section III:		
11. I believe the discrimination I experienced was based on <i>(check all that apply)</i> :		
<input type="checkbox"/> Race Origin	<input type="checkbox"/> Color	<input type="checkbox"/> National
12. Date of alleged discrimination: <i>(mm/dd/yyyy)</i>		

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.

HELP of Ojai, Inc. Title VI Complaint Form, Page 2

COMPLAINT FORM

Section IV:		
14. Have you previously filed a Title VI complaint with HELP of Ojai, Inc.?	YES	NO
Section V:		
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:
Section VI:		
Name of Transit Agency complaint is against:		
Contact Person:		
Telephone:		

HELP of Ojai Transportation Program Title VI Program

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:

HELP of Ojai, Inc. Title VI Coordinator

111 W. Santa Ana St.

P. O. Box 621

Ojai, CA 93024

Titulo VI Procedimiento de Queja

Como un receptor de dólares federales, HELP of Ojai, Inc. 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. HELP of Ojai, Inc. 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 HELP of Ojai, Inc. puede presentar al Título VI su denuncia. HELP of Ojai, Inc. investiga las quejas no mas de 180 días después del incidente. HELP of Ojai, Inc. solo tramitara las quejas que están completas.

En un periodo de 10 días de haber recibido la demanda, HELP of Ojai, Inc. 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. HELP of Ojai, Inc. tiene 30 días para investigar la queja.

Si necesita mas información para resolver el caso, HELP of Ojai, Inc. 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:		

HELP of Ojai Transportation Program Title VI Program

Direccion:	
Telefono:	Correo electronico:
Seccion VI:	
Nombre de organismo Transito denuncia es contra:	
Persona de contacto:	
Telefono:	

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

HELP of Ojai, Inc. has not been involved in any transportation-related Title VI investigations, lawsuits or complaints.

HELP of Ojai, Inc. 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

HELP of Ojai, Inc. is a local 501 (c) 3 non-profit with the mission statement “To combine individual and community resources to respond to the unmet basic human needs of Ojai Valley residents.”

Our transportation program provides door-to-door rides for seniors over the age of 60 and the disabled. We serve residents living in the city of Ojai and in the surrounding unincorporated areas of the 80 square mile Ojai valley. The transportation program is overseen by one staff member and supported by a rotating crew of 23 volunteer drivers. HELP of Ojai is the only social service non-profit in the Ojai valley and is, therefore, well-known in the community. All medical facilities, nursing homes and businesses are familiar with our services. We publish a bi-monthly community bulletin outlining our programs and activities, which is available at all of our sites and can be received by mail and electronically. In addition, the Ventura County Area Agency on Aging and the Ventura County Transportation Commission partner with us in referring seniors and the disabled to our transportation program. We reach the public as follows: our board meetings are open to the public; we have numerous public functions throughout the year; our executive director speaks to local groups (Rotary Club, Lion’s Club, Retired Businessmen’s Club, PEO, a philanthropic educational organization, school groups, etc.) to keep members and the public updated on HELP’s services; we offer our facilities to other programs focused on the Hispanic community; and we have staff that regularly reaches out to the Hispanic population with an invitation to our senior nutrition congregate meal.

The total population (according to 2010 statistics) in the geographic area we serve (ZIP codes 93022 and 93023) is 29,323. Of that population 7,331 are age 60 and over. We have English and Spanish notification of our services placed in various businesses in the geographic area we serve. We have bi-lingual staff at two of three service locations.

FOUR FACTOR ANALYSIS

Factor 1: The number or proportion of LEP (Limited English Proficiency) persons eligible to be served or likely to be encountered by HELP of Ojai.

HELP of Ojai is a local 501 (c) 3 non-profit with the mission statement “To combine individual and community resources to respond to the unmet basic human needs of Ojai valley residents.”

We are a recipient of FTA Section 5310 vehicles used to provide transportation to seniors and the disabled. Our program serves those persons 60 years of age and older and the disabled by offering door-to-door transportation within the 80 square mile Ojai valley. The total population (according to 2010 county-wide statistics) in the geographic area we serve (ZIP codes 93022 and 93023) is 29,323. Of that population, 7,331 are age 60 and over.

Based on available County of Ventura data, we estimate there are approximately 67 LEP seniors in the valley. We are the only non-profit social service agency in our small town and are, therefore, very well known to all medical facilities and businesses. Clients are referred to us also by the Ventura County Area Agency on Aging and Ventura County Adult Protective Services.

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

Through HELP of Ojai’s Community Assistance Program and Valley Outreach Program (CAP/VO), approximately 10-15 (duplicated) Limited English Proficiency clients age 60 and above access services each month. These HELP programs are usually the first stop for our local neighbors who are looking for help with basic needs.

The staff of these programs makes referrals as appropriate for all clients. The Ojai Valley is a small community where word-of-mouth is a major source of communication, and this is especially true with our Hispanic population. HELP staff has worked hard over the years to gain the trust of our Hispanic neighbors, but there is an underlying fear of accessing services. There is no local Spanish newspaper to use to reach this group.

Ojai has a very efficient trolley system that is used very heavily by our Hispanic neighbors. Additionally, HELP of Ojai runs a thrift store that is frequented by LEP persons.

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

HELP of Ojai’s door-to-door transportation program ensures that seniors have access to basic services in our community, medical and other health-related appointments, shopping, and opportunities to remain independent and active. Having available transportation plays a vital role in ensuring quality of life.

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

HELP of Ojai Transportation Program Title VI Program

HELP of Ojai's operating budget does not have a specific line item for providing language access outreach. Our organization has a staff of 17 (full and part-time) employees, who work with and oversee approximately 250 volunteers at four separate locations. HELP of Ojai has reviewed its available resources that could be used for providing LEP assistance, which of its documents would be most valuable to be translated if the need should arise and determined that we have staff members available for such translation. Funds are designated for outreach on an as-needed basis.

There has been no cost for translation of documents. There has been minimal expenditure to prepare fliers advertising our transportation service, and our website is maintained by a volunteer.

LANGUAGE ASSISTANCE IMPLEMENTATION PLAN

Identifying LEP Individuals

Spanish is the predominant minority language in our service area.

Providing Services

HELP of Ojai does not have available funds to employ the services of a professional translation staff person, but we do have staff at two of three service locations available for translation as needed. The documents that we offer in Spanish are:

Title VI Notice to the Public
Title VI Complaint Form
Title VI Complaint Procedures
Agency website Title VI information

Communicating Availability of Language Assistance

Individuals who access services at HELP of Ojai, either by referral from another agency or as a result of community outreach, are interviewed or provided guidance into the programs that fit their needs. Within those programs, Spanish translation is available as needed.

Monitoring

The HELP of Ojai continuously analyzes trends and patterns that indicate a need for additional services. We determine this by the number of direct agency requests received, monitoring demographic trends in the local community, communications from City of Ojai and County of Ventura government agencies and feedback from periodic articles outlining our services in both English and Spanish publications. As needs emerge, we seek input from affected groups and work to implement suggestions for services within the scope of our agency mission.

Employee and Volunteer Training

HELP of Ojai conducts in-service training for staff that can include Customer Service and Language Assistance training. HELP of Ojai encourages staff and volunteer interest and education in learning to more effectively communicate with individuals served in all of HELP'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.

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

HELP of Ojai Transportation Program Title VI Program

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."

HELP of Ojai has written translation of the most important documents for the Safe Harbor provisions. Any further translation needed is provided by one of two bi-lingual staff at any one of three locations. These staff members are available during working hours and on-call for translation within any HELP program.

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 "utilizing 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

HELP of Ojai Transportation Program Title VI Program

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. The HELP of Ojai, Inc. language assistance plan (LAP) includes a four factor analysis and implementation plan that complies with the requirements of DOT LEP guidance.

HELP of Ojai Transportation Program Title VI Document

**Board of Directors Approval of HELP of Ojai, Inc.
Title VI Program**

**A RESOLUTION OF HELP OF OJAI, INC. AUTHORIZING THE
TITLE VI
COMPLIANCE PLAN FOR THE AGENCY**

WHEREAS, HELP of Ojai, Inc., 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 Requirements 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 HELP of Ojai, Inc. 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 HELP of Ojai, Inc. in Ventura County, State of California, on this 19th day of October 2020.

President of the Board

Severo Lara

HELP of Ojai Transportation Program Title VI Program