

Choice in Aging

TITLE VI PROGRAM

Developed: May 5, 2023

Approved by Choice in Aging's Board of Directors:

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<https://choiceinaging.org/>**

INTRODUCTION

This document was prepared by [Choice in Aging](https://choiceinaging.org/) 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."

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Choice in Aging Title VI Notice to the Public

Notifying the Public of Rights Under Title VI

Choice in Aging

- **Choice in Aging** 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 **Choice in Aging**.
- For more information on **Choice in Aging's** civil rights program, and the procedures to file a complaint, contact **925.682.6330**, or visit our administrative office at **490 Golf Club Road, Pleasant Hill, CA 94523**. For more information, visit <https://choiceinaging.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 **925.682.6330**.

Notificar al público de los derechos bajo el título VI

Choice in Aging

- **Choice in Aging** 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 **Choice in Aging**
- 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 **490 Golf Club Road, Pleasant Hill, CA 944523**. Para más información información, visite <https://choiceinaging.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 **925.683.6330**.

List of Locations Where Title VI Notice Is Posted

Choice in Aging's notice to the public is currently posted at the following locations:

Location Name	Address	City
Reception Area	490 Golf Club Road	Pleasant Hill, CA
5310 Vehicles	490 Golf Club Road	Pleasant Hill, CA
Conference Room	490 Golf Club Road	Pleasant Hill, CA

The Title VI notice and program information is also provided on Choice in Aging's website at <https://choiceinaging.org/>.

Title VI Complaint Procedures

As a recipient of federal dollars, [Choice in Aging](#) 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. [Choice in Aging](#) 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 [Choice in Aging](#) may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form. [Choice in Aging](#) investigates complaints received no more than 180 days after the alleged incident. [Choice in Aging](#) will only process complaints that are complete.

Within 10 business days of receiving the complaint, [Choice in Aging](#) 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. [Choice in Aging](#) 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, [Choice in Aging](#) 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 [Choice in Aging](#) 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.

Choice in Aging Title VI Complaint Form

COMPLAINT FORM

Section I: Please write legibly		
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	<input type="checkbox"/> Color	<input type="checkbox"/> National Origin
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.		

Choice in Aging Title VI Complaint Form, Page 2

COMPLAINT FORM

Section IV:		
14. Have you previously filed a Title VI complaint with Choice in Aging ?	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? [] YES* [] NO If yes, check all that apply: [] Federal Agency _____ [] State Agency _____ [] Federal Court _____ [] Local Agency _____ [] 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:		

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:

[Choice in Aging](#), Title VI Coordinator
490 Golf Club Road
Pleasant Hill, CA 94523

Titulo VI Procedimiento de Queja

Como un receptor de dólares federales, [Choice in Aging](#), 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. [Choice in Aging](#) 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 [Choice in Aging](#) puede presentar al Título VI su denuncia. [Choice in Aging](#) investiga las quejas no mas de 180 días después del incidente. [Choice in Aging](#) solo tramitara las quejas que están completas.

En un periodo de 10 días de haber recibido la demanda, [Choice in Aging](#) 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. [Choice in Aging](#) tiene 30 días para investigar la queja.

Si necesita mas información para resolver el caso, [Choice in Aging](#) 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.		

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

Choice in Aging has not been involved in any transportation-related Title VI investigations, lawsuits or complaints.

Choice in Aging

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 Choice in Aging

Choice in Aging (CiA), a nonprofit 501(c)3 organization, is one of the oldest and most innovative providers of coordinated health and social services for frail seniors and adults with disabilities in Contra Costa County. CiA provides comprehensive, coordinated, culturally appropriate long term health and social services to some of the Bay Area's most vulnerable seniors and people with disabilities, to help them remain living in their own homes and prevent more costly health care interventions such as emergency room visits, hospitalizations, and premature nursing home placement.

CiA is the only state-licensed provider of Adult Day Health Care (ADHC) in Contra Costa County, located in the fast-growing central part of the county. CiA's ADHC program offers a medical model of care through an outpatient day program for seniors and other adults with multiple, chronic medical, cognitive or mental health disabilities who are at risk of being institutionalized. A coordinated team of licensed professional, including nurses; social workers; and physical, speech and occupational therapists, focus on medical, preventive, and social care to improve health outcomes for high cost/high risk patients. The program also provides social activities, personal care, hot meals, and nutritional counseling. An intergenerational program with CiA participants and Choice in Learning Montessori Preschool students, provides activities for seniors and preschoolers, and has been a huge success after starting several years ago.

The majority of participants in the ADHC program are Medi-Cal beneficiaries. Two bicultural/bilingual programs also serve monolingual Russian and Afghani refugees.

Choice in Aging's small bus meets the unique transportation needs of the ADHC participants. The vehicle offers convertible seating that can accommodate a range of wheelchair sizes and ambulatory riders. Clients using the bus may not have the cognitive or physical ability to withstand long rides on the LINK paratransit service, which services multiple stops before reaching CiA's doors. CiA offers "door-through-door" service, meaning that the driver assists clients from the front door to the vehicle and through CiA's front door, and back again at the end of the day. The transportation services are provided at no charge for ADHC participants.

Choice in Aging has a number of other programs: The Multipurpose Senior Services Program (MSSP) helps prevent or delay institutionalization by providing a complete assessment of the client's physical, mental, and social status to determine what services are necessary. The program then coordinates with the participant, doctor, caregiver, and family to prepare a personalized care plan to support living safely at home. California Community Transitions helps Medi-Cal eligible Californians who live in skilled nursing facilities move into their own homes or other community living setting with appropriate supports to help them live comfortably, safely, and independently. CiA is also an Alzheimer's Day Care Resource Center for central, south, and east Contra Costa County. CiA's Prevention and Early Access for Seniors Program in Solano County is a mental health case management program that identifies 60+ adults who are struggling to maintain a positive quality of life. The program provides intake, assessment, referral, case management, housing, transportation resources, and other services aimed at improving quality of life. Finally, CiA offers caregiver support programs and education.

SUMMARY: Choice in Aging Outreach Efforts

The following is a summary of outreach efforts conducted by Choice in Aging related to Title VI requirements under the Public Participation Plan:

Outreach to adult and aging services and disability-related agencies by the CEO, social workers, and the Mt. Diablo Center staff is ongoing throughout the year. Staff not only make individual presentations to agencies with elderly, disabled, and/or minority clients, they attend several public resource events geared toward the aging population. Reception staff is trained to answer questions and provide information about the services provided and transportation choices to and from CiA. Working collaboratively with the Concord Senior Center, County Connection's LINK paratransit service, Contra Costa Transportation Authority's Paratransit Coordinating Council, and many other agencies and organizations, keeps CiA and its programs connected to the community and their needs.

Paratransit Coordinating Council (PCC)

CiA's CEO (or designee) holds a position on the Contra Costa Transportation Authority's Paratransit Coordinating Council (meeting every other month).

Advisory Council on Aging (ACOA) Transportation Work Group

These monthly meetings provide an opportunity to develop and maintain best practices in working with the elder and disabled population as well as discussing the population needs and possibilities for funding to keep these programs running. The elder and disabled populations continue to grow and continue to have needs far beyond those of mandatory transportation services.

Senior Mobility Action Council (SMAC)

CiA's CEO (or designee) holds a position on SMAC. These monthly meetings provide an opportunity to meet with other agencies in the county to ensure access to transportation. Additionally, SMAC holds annual or bi-annual events which bring together members of the community to discuss and provide education on senior transportation issues.

Annual Satisfaction Surveys

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

Agency and Government Partners

CiA partners with many agencies on projects, funding applications, brainstorming sessions, and advocating for additional services and resources for seniors and people with disabilities, transportation for participants, etc. Some of these agencies and government entities are: The Alzheimer's Association, Disability Rights California, California Senior Legislature, Justice in Aging, Family Caregiver Alliance, Meals on Wheels, Contra Costa/Solano/Sacramento/Napa Health Services, Adult Protective Services, and Senior Legal Services.

Choice in Aging's Support Groups

CiA provides an Alzheimer's Support Group and a Caregiver Support Group that meet approximately quarterly. These groups are open to everyone and are free of charge.

Dishing with Debbie

CiA hosts a Facebook Live series titled, "Dishing with Debbie," where President & CEO Debbie Toth speaks with a special guest (or guests!) on relevant topics such as transportation, policy, elder issues, disability rights, the future of adult day health care, etc.

Choice in Aging's Website

Choice in Aging 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.

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 [Choice in Aging](#) program, activity or service.
- **Factor 2:** The frequency with which LEP persons come in contact with the [Choice in Aging](#) program, activity or service.
- **Factor 3:** The nature and importance of programs, activities or services provided by [Choice in Aging](#) to the LEP population.
- **Factor 4:** The resources available to [Choice in Aging](#) 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. Choice in Aging's language assistance plan (LAP) includes a four factor analysis and implementation plan that complies with the requirements of DOT LEP guidance.

Choice in Aging Four Factor Analysis

Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by Choice in Aging.

Choice in Aging holds 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 older adults, most having age-based disabilities where current public transit options are insufficient or do not exist.

CiA serves individuals in Contra Costa County where the population is diverse, with a number of residents speaking a language other than English. The CiA staff is also diverse with several native languages represented.

Determination of Need

Approximately 10% of the people served by Choice in Aging represent communities of color including Hispanic/Latino 8% and Asian Pacific Islanders at 2%. CiA also serves cultures within the larger Caucasian group, including Russians and Afghans. CiA has an extensive history of serving Russian and Afghani participants and providing services in their native languages.

According to U.S. Census Bureau data, as of 2015, there were an estimated 1,000 to 1,400 people of Russian descent living in Walnut Creek, and another estimated 6,000 to 7,000 living in Concord, Pleasant Hill, San Ramon and other Contra Costa cities. These cities are CiA's primary services area. Additionally, since the US military departure from Afghanistan, many more Afghans have arrived in the United States. According to the Migration Policy Institute, immigrants from Afghanistan were concentrated in California (41 percent) and Virginia (18 percent), followed by New York and Texas (7 percent each) during the 2015-19 period. The top four counties by Afghan population were Sacramento County in California, Fairfax County in Virginia, and Alameda County and Contra Costa County in California. Together these four counties were home to 27 percent of Afghan immigrants in the United States.

American Community Survey:

Data from the American Community Survey 2016 to 2020 5-Year Estimates, Contra Costa County has 1,147,788 residents. Of those, 382,538 (35.3%) speak a language other than English at home and 139,475 speak English "less than very well." There are 195,737 Spanish speakers and of those, 76,116 speak English less than "very well." There are 107,800 Asian and Pacific Islander speakers and of those, 41,352 speak English less than "very well." There are 13,975 speakers of other languages, and of those, 3,616 speak English less than "very well."

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

Individuals who have a limited ability to read, write, speak, or understand English are limited English proficient, or “LEP.” Choice in Aging will continue to take reasonable steps to ensure that all persons have meaningful access to its programs, services, and information at no cost. Several CiA staff are bilingual and speak English and Spanish, English and Farsi, and English and Russian since most of our clients who are monolingual speak those three languages.

Outreach to adult and aging services and disabled-related agencies by the President/CEO and the staff is ongoing throughout the year. Staff not only make individual presentations to agencies whose clients are elderly, who have disabilities, and are minorities, they attend several public resource events geared toward the aging population. Reception staff is trained to answer questions and provide information about the transportation choices to and from CiA and about the programs offered. CiA’s social workers are able to assess LEP needs from prospective participants and their families, and to insure that translations services are provided, if needed.

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

Choice in Aging is one of the oldest and most innovative providers of coordinated health and social services for frail seniors and others with disabilities in Contra Costa County (and several neighboring counties). CiA provides comprehensive, coordinated, and culturally appropriate long-term health and social services to some of the Bay Area’s most vulnerable frail seniors and other adults with disabilities to help them remain living in their own homes and prevent more costly health care interventions such as emergency room visits, hospitalizations, and premature nursing home placement. CiA is the only state-licensed provider of Adult Day Health Care (ADHC) in Contra Costa County, and the only one easily accessible to residents of the county’s fast-growing central region.

The ADHC program offers a medical model of care through an outpatient day program for seniors and other adults with multiple, chronic medical, cognitive, or mental health disabilities who are at risk of needing institutional care. A coordinated team of licensed professionals, including nurses, social workers and physical, speech and occupational therapists, focus on medical, preventive and social care to improve health outcomes for high cost/high risk patients. The program also provides social activities, personal care, hot meals, and nutritional counseling. The majority of participants are Medi-Cal beneficiaries. Two bicultural/bilingual programs also serve monolingual Russian and Afghani refugees.

Without Choice in Aging, many of the participants would not be thriving.

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

Choice in Aging currently has the ability to provide information and speak to participants/families/caregivers in English, Spanish, Russian, or Farsi. In the event that a non-English speaking client or client’s family/caregiver requires additional translation services, Choice in Aging’s staff (primarily the social workers, adult day health care program assistants,

the Program Director, or receptionist) will assess the need and provide a solution. For example, CiA works very closely with Contra Costa Health Services which provide free interpretive services to their health plan patients. In the event CiA needs, assistance, Contra Costa Health Plan staff are a resource. Additionally, private interpretive services can be utilized if needed for languages including Mandarin, Cantonese, Vietnamese, French, German, Filipino, Korean, etc. Written materials may be translated by contacting Choice in Aging at 925.683.6330. CiA can also utilize staff or the family members with appropriate language to communicate with the client.

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 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 person 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.”

Staff Training:

Choice in Aging works to instill its staff with an awareness of and sensitivity to the needs of LEP participants and residents. Additionally, staff are encouraged to participate in trainings on working with multicultural populations in order to accommodate non-English speaking populations. Best practices guidelines for accommodating LEP populations are included in Choice in Aging’s Policies and Procedures.

Notification to LEP Persons:

The public must be informed of their rights under Title VI. This will be done in a number of ways:

- The availability of free interpretive services or other assistance is conveyed in the New Participant packet that is signed by new clients or a family member/caregiver.

- Routine use of language on printed or electronic announcements that alert interested individuals on how to request translation assistance.
- Monitoring and Updating the LEP Plan.

Choice in Aging will continue to monitor requests for translation and adjust practices to meet the demand for languages other than spoken by staff.

SUMMARY

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

Choice in Aging has served Russian and Farsi speaking participants for many years and offers programs in Russian and Farsi, as well as translated print materials such as lunch menus.

Choice in Aging has staff that speak English, Spanish, Russian, and Farsi and those are the primary languages of the participants.

No consumers were underserved or exited the program due to language barriers.

Choice in Aging provides transportation to and from its adult day health care program. The bus driver speaks English, but has been trained on basic words and phrases in Farsi and Russian, as well as on cultural sensitivities, so as to best serve CiA's participants. Russian and Farsi staff meet the participants at the bus in the morning, and escort the participants to the bus in the afternoon.

Provision of transit is not considered an “essential” service but is a component of the Choice in Aging program.

Choice in Aging does not have an LEP specific budget line item. However, if private translation services were needed, CiA would cover the cost of the services.

Choice in Aging spends less than \$1,000 per year on all outreach efforts.

Membership of Non-Elected Committees and Councils

Choice in Aging does not have a non-elected transit related advisory council at this time.

Title VI Equity Analysis

Choice in Aging does not have transit related facilities.