



Redwood Coast Senior Center
Title VI Program
& Limited English Proficiency Plan

Transit Service

2023



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Redwood Coast Senior Center Title VI Program Transit System

Introduction:

Redwood Coast Seniors, Inc. is a 501(c)(3) tax-exempt corporation formed in 1973 for the purpose of operating a Senior Center offering programs and services in support of healthy aging of elder residents on the Mendocino North Coast of California. The Center has now been in continuous operation for the past 40 years.

For the past three decades Redwood Coast Senior Center has operated an elder nutrition program providing both congregate meals, and home delivered meals. The center has always provided a full range of Outreach/Information and Assistance Services to our older adult client population. For the past 2 1/2 decades we have also operated an Alzheimer's Day Care Program which is licensed by the California Department Of Social Services. In addition, the center operates a Senior Transportation Service providing on-call bus rides to over 1000 elders monthly, under contract with the Mendocino Transit Authority. Redwood Coast Seniors, Inc. operates the oldest and largest Senior Center in Lake and Mendocino Counties.

Redwood Coast Senior Center employs a highly professional staff with long years of experience working with seniors. In addition the center recruits and trains a volunteer organization which includes over 60 individuals who provide a wide range of staff services every week, serving in the dining room, helping in the kitchen, operating the Thrift Store, assisting in the Day Care Center, providing office and outreach support, operating the kitchen garden, and delivering meals on wheels.

Current staff include: Executive Director with 30 years experience administering multi-service community support organizations; Finance Director with 20 years experience in accounting, financial management and contract administration; Food Service Manager with 20 years food and restaurant experience. In addition we have the Meals on Wheels program operating at the center. We are currently recruiting for a Day Program Manager with experience in caring for elders with Alzheimer. The additional full and part-time staff at Redwood Coast Senior Center average between five and 10 years experience working in their respective positions at the center.

Redwood Coast Senior Center is one half of the way through a 99 year no-cost lease of a surplus school building owned by the Fort Bragg Unified School District. The historic Redwood single-story structure is the oldest school building in the community. It has a commercial kitchen, dining room that seats 120, a day program center, thrift store, multiple activity rooms, and extensive parking. The center is located six blocks off Main Street in Fort Bragg, approximately at the center of its Mendocino North Coast geographic service area. Redwood Coast Senior Center maintains business hours from 8 AM to 4 PM Monday through Friday. All staff, services, and transportation are available during those hours. In addition, the center hosts a variety of evening and weekend activities.

Food Service Director develops and menus, purchases food and supplies, and directly supervises the preparation of all dining room and delivered meals. Food service staff arrives at 6AM Monday through Friday to operate kitchen. First round of delivered meals is prepared and packed in hot cases by 10:30 for distribution by volunteer drivers to approximately 120 home locations. Crew continues preparing the congregate lunch meal which is served from 11:30AM to 1:30PM

Center office opens at 8 AM Monday through Friday. Phones are answered all day taking transportation, consultation and service requests from clients. Two Outreach Workers and Executive Director are on duty all day to work directly with clients providing support and consultation services, and identifying appropriate resources and making referrals.

The Adult Day Program Manager arrives at 8:AM, opens the Day Care Center, and prepares programs and materials for the arrival of daycare clients at 9 AM. With the assistance of volunteers, the day program manager works directly with clients, including serving lunch, until 2:30 PM.

Bus drivers provide through door pickup and delivery service of daycare clients in the morning and afternoon. During the rest of the day drivers respond to call in requests for transportation services from seniors and support referrals from outreach staff. Bus Service hours are 7:30AM to 3:30PM.

A regular program of educational, social and recreational programs is provided every day, with logistical support from center staff, and program operation generally supervised by volunteers.

The Executive Director and Finance Director manage the business affairs of the center, with support from an eight member, highly active Board of Directors. Finance director is responsible for all fiscal reporting relative to contracts, and the Executive Director and Program Manager are responsible for operational reporting relative to contracts. Full information regarding the operation of Redwood Coast Senior Center is available on the website – <http://www.rcscenter.org> – including financial statements, a strategic operating plan, and board minutes. Redwood Coast Seniors annual operating budget is approximately \$900,000. The Center's income comes from three main sources: 30% from cash and in kind community donations; 45% from contract service fees; and about 25% from client service fees and donations. Redwood Coast Seniors, Inc. maintains approximately a \$250,000 capital development and emergency operating reserve fund.

Plan Statement:

The Redwood Coast Senior Center operates their transit service in the Greater Fort Bragg area. As a condition of receiving Federal Transit Administration (FTA) financial assistance from the U.S. Department of Transportation (DOT) to operate this service, the Redwood Coast Senior Center must ensure that their programs, policies, and activities comply with DOT's Title VI regulations. The following program was developed to guide the Redwood Coast Senior Center in its administration and management of Title VI-related activities, and details how the Redwood Coast Senior Center meets the requirements as set forth in FTA Circular 4702.1B.

Section 601 under Title VI of the Civil Rights Act of 1964 states the following:

“No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.”

Policy:

The Redwood Coast Senior Center is committed to ensuring that no person on the basis of race, color, or national origin will be excluded from participation or subjected to discrimination in the level and quality of transit services or related benefits provided by the Redwood Coast Senior Center’s employees, affiliates, and contractors.

Governing Board:

The governing board for Redwood Coast Senior Center’s transit system is made up of eight members that are elected by the Center’s membership.

General Reporting Requirements:

Chapter III of FTA Circular 4702.1B addresses the general reporting requirements for recipients and sub-recipients of Federal Transit Administration (FTA) funding to ensure that their activities comply with DOT Title VI regulations. Below are summaries of each requirement and how the Redwood Coast Senior Center’s Title VI Program fulfills that requirement.

1. REQUIREMENT TO PROVIDE TITLE VI ASSURANCES.

In accordance with 49 CFR Section 21.7(a), every application for financial assistance from FTA must be accompanied by an assurance that the applicant will carry out the program in compliance with DOT’s Title VI regulations. This requirement shall be fulfilled when the applicant/recipient submits its annual certifications and assurances to FTA.

The Redwood Coast Senior Center submits its Certifications and Assurances to Caltrans when they receive a grant.

2. REQUIREMENT TO PREPARE AND SUBMIT A TITLE VI PROGRAM.

FTA requires that all direct and primary recipients document their compliance with DOT’s Title VI regulations by submitting a Title VI Program to their FTA regional civil rights officer once every three years or as otherwise directed by FTA. For all recipients (including sub-recipients), the Title VI Program must be approved by the recipient’s board of directors or appropriate governing entity or official(s) responsible for policy decisions prior to submission to FTA. Sub-recipients shall submit Title VI Programs to the primary recipient from whom they receive funding in order to assist the primary recipient in its compliance efforts.

Redwood Coast Senior Center’s Board of Directors will approve this Title VI Program by resolution. The effective date will be the date of the resolution.

3. REQUIREMENT TO NOTIFY BENEFICIARIES OF PROTECTION UNDER TITLE VI

The Title VI Program shall include recipient’s Title VI notice to the public that indicates the recipient complies with Title VI, and informs members of the public of the protections against discrimination afforded to them by Title VI. Include a list of locations where the notice is posted.

The Redwood Coast Senior Center has developed a public Title VI Notice to Beneficiaries following the guidelines of Circular FTA C 4702.1B, Appendix B. A copy of this notice is found in Appendix A of this Title VI Program. The notice is displayed in the lobby of the Redwood Coast Senior Center and on the bus. The notice is also posted on the following website: <http://www.rcscenter.org/transport.php>.

4. REQUIREMENT TO HAVE TITLE VI COMPLAINT PROCEDURES AND A COMPLAINT FORM

All recipients shall develop procedures for investigating and tracking Title VI complaints filed against them and make their procedures for filing a complaint available to members of the public. Recipients must also develop a Title VI complaint form, and the form and procedure for filing a complaint shall be available on the recipient's website.

The Redwood Coast Senior Center has developed a Title VI complaint procedure and form. In this Title VI Program, Appendix B outlines the Center's Title VI Complaint Procedures, and Appendix C is a copy of the Center's Title VI Complaint form.

The complaint procedures and form are available in English and Spanish on the bus, at the Center's front desk, and on the Center's transit webpage, <http://www.rcscenter.org/transport.php>. Individuals who do not have access to the internet may request that the Center mail them a paper copy of the procedures and form.

5. REQUIREMENT TO RECORD AND REPORT TRANSIT-RELATED TITLE VI INVESTIGATIONS, COMPLAINTS, AND LAWSUITS

In order to comply with the reporting requirements of 49 CFR Section 21.9(b), FTA requires all recipients to prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, or national origin: active investigations conducted by entities other than FTA; lawsuits; and complaints naming the recipient. This list shall include the date that the investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by the recipient in response, or final findings related to, the investigation, lawsuit, or complaint.

The Redwood Coast Senior Center will maintain a list of all investigations, lawsuits and complaints naming Redwood Coast Senior Center according to the guidelines of Circular FTA C 4702.1B, Appendix E. A copy of this list is provided in Appendix E of this Title VI Program. In addition, the Center will maintain permanent records of all related documents. The Redwood Coast Senior Center has not received any Title VI complaints of discrimination and therefore does not have any investigations or lawsuits to report, however the processes are in place in the instance that complaints are made.

6. REQUIREMENT TO PROMOTE INCLUSIVE PUBLIC PARTICIPATION

The content and considerations of Title VI, the Executive Order on LEP, and the DOT LEP Guidance shall be integrated into each recipient's established public participation plan or process (i.e., the document that explicitly describes the proactive strategies, procedures, and desired outcomes that underpin the recipient's public participation activities).

The Redwood Coast Senior Center's public participation policy is shown in Appendix F of this Title VI Program. The Redwood Coast Senior Center ensures that minority and LEP

populations, as with all members of the Center, will be empowered to participate in decisions involved with the Redwood Coast Senior Center's transit system.

7. REQUIREMENT TO PROVIDE MEANINGFUL ACCESS TO LEP PERSONS.

Consistent with Title VI of the Civil Rights Act of 1964, DOT's implementing regulations, and Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency" (65 FR 50121, Aug. 11, 2000), recipients shall take reasonable steps to ensure meaningful access to benefits, services, information, and other important portions of their programs and activities for individuals who are limited-English proficient (LEP).

Please see the Redwood Coast Senior Center Limited English Proficiency Plan page 7 of the Title VI plan. The Redwood Coast Senior Center's Four Factor Analysis and action plan are contained therein.

8. MINORITY REPRESENTATION ON PLANNING AND ADVISORY BODIES.

Title 49 CFR Section 21.5(b)(1)(vii) states that a recipient may not, on the grounds of race, color, or national origin, "deny a person the opportunity to participate as a member of a planning, advisory, or similar body which is an integral part of the program." Recipients that have transit-related, non-elected planning boards, advisory councils or committees, or similar committees, the membership of which is selected by the recipient, must provide a table depicting the racial breakdown of the membership of those committees, and a description of efforts made to encourage the participation of minorities on such committees.

The Redwood Coast Senior Center does not have a non-elected transit board or advisory council, however in the event that one were established, the Center would ensure proper minority representation on such board or council.

9. REQUIREMENT TO PROVIDE ASSISTANCE TO SUBRECIPIENTS

Title 49 CFR Section 21.9(b) states that if "a primary recipient extends Federal financial assistance to any other recipient, such other recipient shall also submit such compliance reports to the primary recipient as may be necessary to enable the primary recipient to carry out its obligations under this part." Primary recipients should assist their subrecipients in complying with DOT's Title VI regulations, including the general reporting requirements. Assistance shall be provided to the subrecipient as necessary and appropriate by the primary recipient.

Caltrans only.

10. REQUIREMENT TO MONITOR SUBRECIPIENTS

In accordance with 49 CFR 21.9(b), and to ensure that subrecipients are complying with the DOT Title VI regulations, primary recipients must monitor their subrecipients for compliance with the regulations. Importantly, if a subrecipient is not in compliance with Title VI requirements, then the primary recipient is also not in compliance.

Caltrans only.

11. DETERMINATION OF SITE OR LOCATION OF FACILITIES.

Title 49 CFR Section 21.9(b)(3) states, "In determining the site or location of facilities, a recipient or applicant may not make selections with the purpose or effect of excluding persons from, denying them the benefits of, or subjecting them to discrimination under any program to which this regulation applies, on the grounds of race, color, or national origin; or with the purpose or effect of defeating or substantially impairing the accomplishment of the objectives of the Act or this part." Title 49 CFR part 21, Appendix C, Section (3)(iv) provides, "The location of projects requiring land acquisition and the displacement of persons from their residences and businesses may not be determined on the basis of race, color, or national origin." For the purposes of this requirement, "facilities" does not include bus shelters, as these are transit amenities and are covered in Chapter IV, nor does it include transit stations, power substations, etc. as those are evaluated during project development and the NEPA process. Facilities included in this provision include, but are not limited to, storage facilities, maintenance facilities, operations centers, etc.

The Redwood Coast Senior Center does not construct transit facilities.

12. REQUIREMENT TO PROVIDE ADDITIONAL INFORMATION UPON REQUEST.

FTA may request, at its discretion, information other than that required by this Circular from a recipient in order for FTA to investigate complaints of discrimination or to resolve concerns about possible noncompliance with DOT's Title VI regulations.

The Redwood Coast Senior Center will fully cooperate with any FTA investigation of discrimination complaints to the extent required by Title VI regulations.

Redwood Coast Senior Center Limited English Proficiency Plan

Introduction

The purpose of this Language Assistance Plan is to clarify the responsibilities of the Redwood Coast Senior Center, as a recipient of federal financial assistance from the U.S. Department of Transportation (DOT), to persons with limited English proficiency (LEP), pursuant to Title VI of the Civil Rights Act of 1964 and implementing regulations. It was prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq., and its implementing regulations provide that no person shall be subjected to discrimination on the basis of race, color, or national origin under any program or activity that receives federal financial assistance.

Executive Order 13166 "Improving Access to Services for Persons With Limited English Proficiency," reprinted at 65 FR 50121 (August 11, 2000), directs each Federal agency that is subject to the requirements of Title VI to publish guidance for its respective recipients clarifying that obligation. Executive Order 13166 further directs that all such guidance documents be consistent with the compliance standards and framework detailed in the Department of Justice's (DOJ's) Policy Guidance entitled "Enforcement of Title VI of the Civil Rights Act of 1964--National Origin Discrimination Against Persons With Limited English Proficiency." (See 65 FR 50123, August 16, 2000 DOJ's General LEP Guidance). Different treatment based upon a person's inability to speak, read, write, or understand English may be a type of national origin discrimination.

Executive Order 13166 applies to all federal agencies and all programs and operations of entities that receive funding from the federal government, including state agencies, local agencies and governments, private and non-profit entities (such as Redwood Coast Senior Center), and sub-recipients.

Plan Summary

The Redwood Coast Senior Center has developed this Limited English Proficiency (LEP) plan to help identify reasonable steps to provide language assistance for LEP persons who seek meaningful access to Redwood Coast Senior Center services as required by Executive Order 13166. As defined by this order, a person with Limited English Proficiency is one who does not speak English as their primary language and who has a limited ability to read, write, speak, or understand English.

This plan details procedures for identifying a person who may need language assistance, the ways in which assistance may be provided, staff training, how to notify LEP persons that assistance is available, and potential future updates to the plan.

Four Factor Analysis

The U. S. Department of Transportation (DOT) issued its Policy Guidance Concerning Recipient's Responsibilities to Limited English Proficient (LEP) Persons [Federal Register: December 14, 2005 (Volume 70, Number 239)]. This policy states that DOT recipients are required to take reasonable steps to ensure

meaningful access to programs by LEP persons. This coverage extends to the recipient's entire program. There are four factors for agencies to consider when assessing language needs and determining what steps they should take to ensure access for LEP persons, regardless of whether or not the agency chooses not to prepare a written LEP plan. A brief description of the self-assessment undertaken in each of these areas follows.

In developing the plan, the Redwood Coast Senior Center undertook a Four Factor Analysis as required by U.S. DOT. This considers the following factors:

- 1) The number or proportion of LEP persons eligible to be served or likely to be encountered by the Redwood Coast Senior Center.
- 2) The frequency with which LEP persons come into contact with Redwood Coast Senior Center programs, activities, or services;
- 3) The nature and importance of the programs, activities or services provided by the Redwood Coast Senior Center to the population; and
- 4) The resources available to the Redwood Coast Senior Center for LEP outreach, as well as the costs associated with that outreach.

A summation of these considerations is provided in the following section.

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by the Redwood Coast Senior Center's transit service.

In order to understand the proportion of LEP persons eligible to be served or likely to be encountered by the Redwood Coast Senior Center's transit service, the total population served by the Center's transit service must first be defined. The Redwood Coast Senior Center's transit system serves anyone that is 55 years of age or older and anyone that is disabled. The range of the Center's transit system is the Greater Fort Bragg Area and the communities of Caspar, Cleone, and Mendocino. Based on the geographic locations available within the American Community Survey, data for the Caspar CDP¹, Cleone CDP, the City of Fort Bragg, and Mendocino CDP were examined. To calculate the total potential population, the following tables from the 2012-2016 American Community Survey 5-Year Estimates were used:

1. B16004 – Age by Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over
2. DP02 – Selected Social Characteristics in the United States
3. S0101 – Age and Sex

¹ Census Designated Place (CDP) – Statistical counterpart of incorporated places, delineated to provide data for settled concentrations of population identifiable by name but not legally incorporated under the laws of the state in which they are located. CDPs are delineated cooperatively by state and local officials and the Census Bureau, following Census Bureau guidelines.

Using data from the three tables listed above, the total potential population served by the Redwood Coast Senior Center’s transit system can be split into three categories: everyone 65 years of age and older, everyone with a disability under the age of 65, and everyone between the ages of 55 and 64 without a disability. Table B16004 provides the number of people age 65 and older and Table DP02 provides the number of people with a disability under the age of 65. The only piece of data that needs to be calculated is the number of people without a disability between the ages of 55 and 64.

Table DP02 does not provide data on the specific age bracket of 55 to 64 however table S0101 does provide the percentage of the population between these ages. With this data, the number of people between these ages without a disability can be calculated. One important difference to note between these two tables is the difference in total population for the City of Fort Bragg. S0101 shows a total population of 7,260 whereas table DP02 uses a total “Civilian Noninstitutionalized Population²” of 7,147. Table B16004 shows different total populations for Cleone CDP, the City of Fort Bragg, and Mendocino CDP but the parameters for this table are all people age 5 and over. As a result, an assumption has been made in all calculations that the population percentage breakdown found in table S0101 is the same as in tables DP02 and B16004.

To calculate the number of people without a disability between the ages of 55 and 64, simply take the difference between total population and the number of people who have a disability, found in table DP02, and multiply it by the percent of the population that is between the ages of 55 and 64, found in S0101.

The following table shows the total potential population to be served by the Redwood Coast Senior Center’s transit system based on the three categories and geographic areas discussed above.

Potential Population Served by the Redwood Coast Senior Center Transit Service				
Group	Caspar CDP	Cleone CDP	Fort Bragg City	Mendocino CDP
Age 65+	263	157	1,245	228
Under 65 w/ a Disability	2	24	900	0
Between 55 and 64 w/o a disability	131	67	562	142
Subtotal:	396	248	2,707	371
Total Potential Population:	3,722			

Based on the total potential population, the number or proportion of LEP persons eligible to be served can now be calculated. Executive Order 13166 defines a LEP person as one who does not speak English as their primary language and who has a limited ability to read, write, speak, or understand English. The data found in table B16004 is separated into three age groups: 5 to 17 years, 18 to 64 years, and age 65

² All U.S. civilians not residing in institutional group quarters facilities such as correctional institutions, juvenile facilities, skilled nursing facilities, and other long-term care living arrangements.

plus. The data in each age group is broken down by the language spoken at home. Finally, for each language spoken at home, the data is separated into four categories based on how well the person speaks English: “very well”, “well”, “not well”, and “not at all”. For the purpose of identifying a LEP person, the Redwood Coast Senior Center examined data for those who speak English “well”, “not well”, or “not at all”.

The table in Appendix L shows the language breakdown for the four geographic areas served by the Redwood Coast Senior Center’s transit service. This table will be instrumental for calculating the number of LEP who may be served or are likely to require the Center’s transit service. The table shows that for all people age 65 and over, there are 18 people who speak a language other than English at home and are not very proficient with the English language. It also provides the data necessary to calculate the number of LEP persons who have a disability and are under the age of 65 as well as those who are between ages 55 and 64 who do not have a disability.

The table below shows disability data from table DP02 that the Redwood Coast Senior Center was able to use to calculate the percentage of the population under the age of 65.

Population Under Age 65 With a Disability			
Geographic Region	Total Pop <65	Pop <65 w/Disability	% Pop <65 w/Disability
Caspar CDP	526	2	0.4%
Cleone CDP	450	24	5.3%
Fort Bragg City	5,968	900	15.1%
Mendocino CDP	549	0	0.0%

To calculate the number of LEP people with a disability under the age of 65, the Redwood Coast Senior Center used the percentages from the table above and multiplied them by the total number of LEP persons under the age of 65 (found in Appendix L) with respect to each geographic region. The table below reflects these calculations:

Population Under Age 65 With a Disability			
Geographic Region	Total LEP Pop <65	% Pop <65 w/Disability	# LEP <65 w/Disability
Caspar CDP	1	0.4%	0
Cleone CDP	80	5.3%	4
Fort Bragg City	1,168	15.1%	176
Mendocino CDP	22	0.0%	0
Total LEP Persons <65 w/Disability:			180

The last piece of data that needs to be calculated is the number of LEP people without a disability who are between the ages of 55 and 64. To do this, the Center multiplied the percentage of the populations

between those ages (found in table S0101) by the total number of LEP people (found in table B16004). The table below reflects these calculations for the four geographic regions.

Population Between Ages 55 and 64 Without a Disability			
Geographic Region	Total LEP Pop	% Pop Ages 55 to 64	# LEP Ages 55 and 64 w/o Disability
Caspar CDP	1	18.0%	0
Cleone CDP	80	13.6%	11
Fort Bragg City	1,168	9.9%	116
Mendocino CDP	22	21.0%	5
Total LEP Persons Between Ages 55 and 64 w/o Disability:			132

The following table depicts the total number of LEP persons in the service area who may be served or are likely to require the Redwood Coast Senior Center’s transit services.

Total LEP Population Potentially Served by the Redwood Coast Senior Center Transit Service					
Group	Caspar CDP	Cleone CDP	Fort Bragg City	Mendocino CDP	Subtotal
Age 65+	0	0	18	0	18
Under 65 w/ a Disability	0	2	96	0	98
Between 55 and 64 w/o a disability	0	11	116	5	132
Total LEP Population:					247
% LEP of the Total Potential Population:					6.6%

DOT has adopted Department of Justice’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’ as defined by Department of Justice, 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 encountered, then such action will be considered strong evidence of compliance with the recipient’s written translation obligations.”

The Redwood Coast Senior Center further examined specific languages using the *2011-2015 American Community Survey 5-Year Estimates: Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over* (Table B16001). This data allowed the Center to determine whether or not those speaking languages other than Spanish fall under the ‘Safe Harbor Provision’. Please refer to Appendix M: 2011-15 American Community Survey 5-Year Estimates: Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over.

All language groups other than Spanish have estimated populations of less than 1,000 persons and 5% of the total population. There are no languages that may approach the Safe Harbor Provision threshold in the foreseeable future.

2. The frequency with which LEP persons come into contact with Redwood Coast Senior Center programs, activities, or services.

According to the *2011-2015 American Community Survey 5-Year Estimates*, the largest geographic concentration of LEP individuals in the Redwood Coast Senior Center's service area is Spanish-speaking. This population is approximately 24.8% of the population over 5 years of age, or an estimated population of 2,140. Those that speak English less than “very well” are 13.5% of the population or an estimated 1,164 people. The Redwood Coast Senior Center regularly assesses the frequency at which staff and drivers have or could possibly have contact with LEP persons. This includes documenting phone inquiries and verbally surveying drivers. The Redwood Coast Senior Center staff and drivers have infrequent interactions with Spanish speaking passengers.

3. The nature and importance of the programs, activities or services provided by the Redwood Coast Senior Center to the population.

The transit service provided by the Redwood Coast Senior Center is an essential service for members of Redwood Coast Senior Center. The Center’s ‘transit-dependent’ population includes elderly persons and people with disabilities. This service provides these people with access to shopping, healthcare, and other facilities in and around the Greater Fort Bragg Area.

4. The resources available to the Redwood Coast Senior Center for LEP outreach, as well as the costs associated with that outreach.

The Redwood Coast Senior Center has assessed its available resources that could be used for providing LEP assistance. Because a small percentage of the riders have been identified as Spanish speaking, the Redwood Coast Senior Center has two Spanish-speaking employees who are available to translate in-person and over the phone. In the event that neither employee is unavailable, the Center has a working agreement with the Safe Passage Family Resource Center for interpretive services. Language interpretation may be available for other languages in cooperation with Mendocino County Social Services. In addition, the Center’s Title VI Notice, Complaint Procedures and Form, and Passenger Conduct Guidelines (Appendices A – D) are available in both English and Spanish and can be found at the Center’s main office, on the bus, and on the website. Over the next year, the Redwood Coast Senior Center plans to have all pamphlets and brochures translated in Spanish.

Language Assistance Plan

A person who does not speak English as their primary language and who has a limited ability to read, write, speak, or understand English may be a Limited English Proficient person and may be entitled to language assistance with respect to the Redwood Coast Senior Center’s services. Language assistance can include interpretation, which means oral or spoken transfer of a message from one language into another language and/or translation, which means the written transfer of a message from one language into another language.

How the Redwood Coast Senior Center Staff may identify an LEP person who needs language assistance:

- Post notice of LEP Plan and the availability of interpretation or translation services free of charge

in languages LEP persons would understand

- All Redwood Coast Senior Center staff will be provided with “I Speak” cards to assist in identifying the language interpretation needed if the occasion arises.
- All Redwood Coast Senior Center staff will be informally surveyed periodically on their experience concerning any contacts with LEP persons during the previous year.
- When the Redwood Coast Senior Center sponsors an informational meeting or event, an advanced public notice of the event should be published including special needs related to offering a translator (LEP) or interpreter (sign language for hearing impaired individuals). The Center will handout a Title VI survey (See Appendix J) in an effort to collect LEP data. Additionally, a staff person may greet participants as they arrive. By informally engaging participants in conversation it is possible to gauge each attendee’s ability to speak and understand English. Although translation may not be able to be provided at the event, it will help identify the need for future events.

Language Assistance Measures

Although there is a very low percentage in the Redwood Coast Senior Center of LEP individuals, that is, persons who speak English “not well” or “not at all”, it will strive to offer the following measures:

1. The Redwood Coast Senior Center staff will take reasonable steps to provide the opportunity for meaningful access to LEP clients who have difficulty communicating in English.
2. The following resources will be available to accommodate LEP persons:
 - a. If an individual is a Spanish-speaker, the Redwood Coast Senior Center has two Spanish-speaking employees who are available to translate in-person and over the phone. In the event that neither employee is unavailable, the Center has a working agreement with the Safe Passage Family Resource Center for interpretive services.
 - b. Language interpretation may be available for other languages in cooperation with Mendocino County Social Services.
3. The Redwood Coast Senior Center will publish meeting notices and minutes in both English and Spanish and they will be posted in the Center’s lobby and on their website. These documents will be available in other languages upon request.

Staff Training

Redwood Coast Senior Center staff has and will continue to receive training on a quarterly basis. The following will be covered during these trainings:

- Information on the Title VI policy and LEP responsibilities.
- The policy and procedures for interaction with LEP persons
- Description of language assistance services offered to the public.
- Use of the “I Speak” cards.
- Documentation of language assistance requests.
- How to handle a Title VI/LEP complaint.

See Appendix K for Training Materials.

Monitoring and Updating

The Redwood Coast Senior Center's Language Assistance Plan is designed to be easily updated. At a minimum, the Redwood Coast Senior Center will follow the Title VI Program update schedule of submission every 3 years.

Each update of the LEP Plan will examine plan components including:

- The number of documented LEP person contacts encountered annually.
- How the needs of LEP persons have been addressed.
- Determination of the current LEP population in the service area.
- Determination as whether the need for translation services has changed.
- Determine whether local language assistance programs have been effective and sufficient to meet the need.
- Determine whether the Redwood Coast Senior Center fully complies with the goals of this LEP Plan.
- Determine whether complaints have been received concerning the agency's failure to meet the needs of LEP individuals.
- Maintain a Title VI complaint log, including LEP to determine issues and basis of complaints.

Dissemination of the Redwood Coast Senior Center Language Assistance Plan

The Redwood Coast Senior Center will include the Language Assistance Plan along with the Title VI Program on the Redwood Coast Senior Center transit website (<http://www.rcscenter.org>) Any person, including social service, non-profit, and law enforcement agencies and other community partners with internet access will be able to access the plan. Copies of the Language Assistance Plan will be provided, on request, to any person(s) requesting the document via phone, in person, by mail or email. LEP persons may obtain copies/translations of the plan upon request.

Any questions regarding this plan should be directed to the Redwood Coast Senior Center Title VI Coordinator:

Redwood Coast Senior Center Title VI Coordinator
490 North Harold Street
Fort Bragg, CA 95437
Phone: (707) 964-0443

Appendix A: Title VI Notice to Beneficiaries

The Redwood Coast Senior Center 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 the Redwood Coast Senior Center.

For more information on the Redwood Coast Senior Center's civil rights program and the procedures to file a complaint, contact (707) 964-0443; go online at <http://www.rcscenter.org/transport.php>; or visit our administrative office at 490 North Harold Street, Fort Bragg, CA 95437.

A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint 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 (707) 964-0443.

Si se necesita información en otro idioma, llame al (707) 964-0443.

Appendix A: Título VI Aviso a los beneficiarios

El Senior Center Redwood Coast opera sus programas y servicios sin tener en cuenta raza, color y origen nacional, de conformidad con el Título VI del Acta de Derechos Civiles. Cualquier persona que cree que él o ella ha sido agraviada por cualquier práctica discriminatoria ilegal bajo el Título VI puede presentar una queja ante el Centro de Ancianos de Redwood Coast.

Para obtener más información sobre el programa de derechos civiles del Senior Center Redwood Coast y los procedimientos para presentar una queja, contacte a (707) 964-0443; ir en línea en <http://www.rcscenter.org/transport.php>, o visite nuestra oficina administrativa en 490 North Harold Street, Fort Bragg, CA 95437.

Un demandante puede presentar una queja directamente con la Administración Federal de Tránsito mediante la presentación de una queja ante la Oficina de Tránsito Administración Federal de Derechos Civiles, Atención: Coordinador del Programa del Título VI, East Building, 5th Floor-TCR, 1200 New Jersey Ave., NW, Washington DC 20590.

Si se necesita información en otro idioma, llame al (707) 964-0443.

Appendix B: Title VI Complaint Procedures

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

All Title VI and related statute complaints are considered formal- there is no informal process. Complaints must be in writing and signed by the complainant on the form provided. Complaints must include the complainant's name, address and phone number and be detailed to specify all issues and circumstances of the alleged discrimination. Allegations must be based on issues involving race, color or national origin. Title VI Complaints of discrimination may be filed with:

Redwood Coast Senior Center
Attn: Title VI Coordinator
490 North Harold Street
Fort Bragg, CA 95437

Once the complaint is received, the Redwood Coast Senior Center 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 the Redwood Coast Senior Center.

The Redwood Coast Senior Center has 30 days to investigate the complaint. If more information is needed to resolve the case, the Redwood Coast Senior Center may contact the complainant. The complainant has 15 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 15 business days, the Redwood Coast Senior Center 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 30 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, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Avenue SE, Washington, DC 20590.

Appendix B: Procedimientos de Quejas del Título VI

Cualquier persona que cree que él o ella ha sido víctima de discriminación en base a raza, color, u origen nacional por el sistema de tránsito de Redwood Coast Senior Center puede presentar una queja del Título VI, completando y enviando el Formulario de Quejas del Título VI de la agencia. El Senior Center Redwood Coast investiga las quejas recibidas no más tardar 180 días después del supuesto incidente. El Senior Center Redwood Coast procesará las denuncias que son completos.

Todos Título VI y las quejas de estatutos relacionados son considerados formales-no existe un proceso informal. Las quejas deben ser por escrito y firmado por el demandante en la forma proporcionada. Las quejas deben incluir el nombre del autor, dirección y número de teléfono y se detalla para especificar todas las cuestiones y circunstancias de la supuesta discriminación. Las denuncias deben basarse en cuestiones relacionadas con la raza, el color o el origen nacional. Quejas del Título VI de discriminación se pueden presentar con:

Redwood Coast Senior Center
Attn: Title VI Coordinator
490 North Harold Street
Fort Bragg, CA 95437

Una vez recibida la denuncia, el Senior Center Redwood Coast lo revisará para determinar si nuestra oficina tiene jurisdicción. El demandante recibirá una carta de acuse de recibo informando a él / ella si la queja será investigada por el Senior Center Redwood Coast.

El Senior Center Redwood Coast tiene 30 días para investigar la denuncia. Si se necesita más información para resolver el caso, el Senior Center Redwood Coast puede ponerse en contacto con el demandante. El demandante tiene 15 días hábiles desde la fecha de la carta a enviar la información solicitada para el investigador asignado al caso. Si el investigador no está en contacto con el reclamante o no reciba la información adicional dentro de los 15 días hábiles, el Senior Center Redwood Coast puede cerrar administrativamente el caso. Un caso puede ser cerrado administrativamente también si el autor ya no desea seguir su caso.

Después de que el investigador revisa la queja, él / ella va a emitir una de las dos cartas a la denunciante: una carta de cierre o una carta de la búsqueda (LOF). Una carta de conclusión resume los hechos denunciados, y afirma que no hubo una violación del Título VI, y que el caso se cerrará. Un LOF resume los hechos denunciados y las entrevistas sobre el supuesto incidente y explica si alguna acción disciplinaria, la formación adicional del miembro del personal, u otra acción ocurrirá. Si el demandante desea apelar la decisión, él / ella tiene 30 días después de la fecha de la carta o el LOF para hacerlo.

Una persona también puede presentar una queja directamente con la Administración Federal de Tránsito, al TLC Oficina de Derechos Civiles, Atención: Coordinador de Programa del Título VI, Edificio Este, 5^º Piso-TCR, 1200 New Jersey Avenue NW, Washington, DC 20590.

Appendix C: Title VI Complaint Form

Section 601 under Title VI of the Civil Rights Act of 1964 states that “No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.” **If you feel you have been discriminated against, please provide the following information in order to assist the Redwood Coast Senior Center in processing your complaint.**

SECTION 1 (Please print clearly):

Name: _____

Address: _____

City, State, Zip Code: _____

Telephone Number: _____ (Home) _____ (Work)

Accessible format requirements? ____ (Large print) ____ (Audiotape) ____ (TDD) ____ (Other)

SECTION 2

Are you filing this complaint on your own behalf? ____ (Yes) ____ (No)

If you answered yes to this question, go to Section 3.

If not, please supply the name and relationship of the person for whom you are complaining:

Name: _____ Relationship: _____

Please explain why you have filed for a third party: _____

Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of the third party. ____ (Yes) ____ (No)

SECTION 3

I believe the discrimination I experienced was based on (check all that apply):

_____ Race _____ Color _____ National Origin

Date and Place of Occurrence: _____

Name (s) and Title(s) of the person (s) who I believe discriminated against me:

The action or decision which caused me to believe I was discriminated against is as follows:

(Please include a description of what happened and how your benefits were denied, delayed or affected):

Please list any and all witnesses' names and phone numbers:

What type of corrective action would you like to see taken?

SECTION 4

Have you previously filed a Title VI complaint with this agency? ____ (Yes) ____ (No)

SECTION 5

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 ____ Federal Court ____ State Agency ____ State Court ____ Local Agency ____

Please provide information about a contact person at the agency/court where the complaint was filed.

Name: _____ Title: _____

Agency: _____

Address: _____

Telephone Number: _____

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

I believe the above information is true and correct to the best of my knowledge.

Signature and date required below:

Signature

Printed Name

Date

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

Redwood Coast Senior Center Title VI Coordinator
490 North Harold Street
Fort Bragg, CA 95437

Appendix C: Formulario de Quejas del Título VI

Sección 601 del Título VI del Acta de Derechos Civiles de 1964 establece que "Ninguna persona en los Estados Unidos, por motivos de raza, color u origen nacional, ser excluida de participar en, ser negado los beneficios de, o ser sometido a la discriminación bajo cualquier programa o actividad que reciba asistencia financiera federal. **"Si usted siente que ha sido discriminado, por favor proporcione la siguiente información con el fin de asistir al Centro de Ancianos Redwood Coast en el procesamiento de su queja.**

SECCIÓN 1 (Por favor escriba claramente):

Nombre: _____
Dirección: _____
Ciudad, Estado, Código Postal: _____
Número de teléfono: _____(Casa) _____(Trabajo)
Requisitos de formato accesible? ____ (Tipografía grande) ____ (Cinta de audio) ____ (TDD) ____ (Otros)

SECCION 2

¿Está usted presentando esta queja en su propio nombre? ____ (Sí) ____ (No)

Si usted contestó sí a esta pregunta, pase a la Sección 3.

Si no es así, por favor proporcione el nombre y la relación de la persona a la que usted se queja:

Nombre: _____ Relación: _____

Por favor, explique por qué usted ha presentado para un tercero: _____

Por favor, confirme que ha obtenido el permiso de la parte perjudicada, si usted está presentando en nombre de la tercera parte. ____ (Sí) ____ (No)

SECCIÓN 3

Creo que la discriminación que experimenté fue basada en (marque todo lo que corresponda):

_____ Raza _____ Color _____ Origen Nacional

Fecha y lugar del accidente: _____

Nombre (s) y cargo (s) de la persona (s) que creo que me discriminó:

La acción o decisión que me hizo creer que fui discriminado es el siguiente:

(Por favor, incluya una descripción de lo que pasó y cómo se les negaba sus beneficios, retraso o afectados):

Por favor escriba los nombres de todas y todos los testigos y los números de teléfono:

¿Qué tipo de acción correctiva le gustaría que se tomar?

SECCIÓN 4

¿Ha presentado anteriormente una queja del Título VI con esta agencia? _____(Sí) _____(No)

SECCIÓN 5

¿Ha presentado esta queja con cualquier otro federal, estatal o local, o ante cualquier tribunal federal o estatal? _____(Sí) _____(No)

En caso afirmativo, marque todo lo que corresponda:

Agencia Federal _____ Tribunal Federal _____ Agencia Estatal _____ Tribunal Estatal _____ Agencia Local _____

Sírvanse proporcionar información acerca de una persona de contacto en la agencia / tribunal donde se presentó la queja.

Nombre: _____ Título: _____

Agencia: _____

Dirección: _____

Teléfono: _____

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

Creo que la información anterior es verdadera y correcta a lo mejor de mi conocimiento.

Firma y fecha requerida a continuación:

Firma

Nombre Impreso

Fecha

Por favor, envíe este formulario en persona en la dirección indicada más abajo o envíe por correo este formulario a:

Redwood Coast Senior Center Title VI Coordinator
490 North Harold Street
Fort Bragg, CA 95437

Appendix D

Redwood Coast Senior Center Passenger Conduct Guidelines

The Redwood Coast Senior Center is dedicated to maintaining a pleasant environment for all of our passengers. To assure the safety and comfort of all our passengers, we ask that all riders abide by the following passenger conduct guidelines.

Passengers Shall:

1. Not evade payment of correct fare.
2. Not misuse any transfer, pass, ticket or token with the intent to evade the payment of any fare.
3. Not play sound equipment on, or in, any RCSC facility or vehicle unless headphones are used and the volume does not disturb other passengers or the driver.
4. Not smoke or drink alcoholic beverages.
5. Not eat food or drink non-alcoholic beverages in open containers on trips less than one hour in duration.
6. Not willfully disturb others by engaging in boisterous or unruly behavior.
7. Not carry any potential harmful concentration or quantities of any toxic or hazardous material including flammable liquid.
8. Not block the free movement of another person in any RCSC facility or vehicle.
9. Not physically or verbally assault or intimidate the driver or passengers.
10. Not steal property or panhandle from the driver or passengers.
11. Not carry weapons of any type onto RCSC vehicles.
12. Not offend other passengers through unacceptable personal hygiene.
13. For the health and safety of the driver and passengers, expelling bodily excrements, either voluntarily or involuntarily, is prohibited.

The Redwood Coast Senior Center transports passengers in accordance with these passenger conduct guidelines to ensure that:

- ❖ The Redwood Coast Senior Center complies with all pertinent State and Federal regulations governing general public transportation.
- ❖ The general public riders and RCSC employees experience safe, comfortable and reliable service.

It is the RCSC's intent to require all passengers to abide by these passenger conduct guidelines. In all cases, our drivers maintain full discretion in the application and enforcement of these guidelines. Enforcement of these passengers conduct guidelines may include, but is not limited to:

- ❖ Requesting a passenger follow all applicable guidelines
- ❖ Removing a passenger from the vehicle
- ❖ Temporarily suspending a passenger's privileges*
- ❖ Revoking a passenger's privileges indefinitely*

*Offenders will be notified by letter, if possible, detailing the offence and the action or actions taken.

Appendix D

Redwood Coast Senior Center Pautas de Conducta del Pasajero

El Senior Center Redwood Coast se dedica a mantener un ambiente agradable para todos nuestros pasajeros. Para garantizar la seguridad y comodidad de todos nuestros pasajeros, pedimos que todos los pilotos se rigen por las siguientes pautas de conducta de los pasajeros.

Los Pasajeros Deberán:

1. No eludir el pago de la tarifa correcta.
2. No abusar de cualquier transferencia, pase, boleto o ficha con la intención de evadir el pago de cualquier tarifa.
3. No jugar en el equipo de sonido, o en, cualquier instalación de RCSC o vehículo salvo que se utilicen los auriculares y el volumen no molesta a otros pasajeros o al conductor.
4. No fumar ni consumir bebidas alcohólicas.
5. No comer alimentos o tomar bebidas no alcohólicas en envases abiertos en los viajes de menos de una hora de duración.
6. No molestar deliberadamente a otros con un comportamiento bullicioso ni de rebeldía.
7. No llevar ningún potencial concentración nociva o cantidades de cualquier material tóxico o peligroso incluyendo líquido inflamable.
8. No bloquear la libre circulación de otra persona en cualquier centro de RCSC o vehículo.
9. No físicamente o verbalmente asalto o intimidar al conductor oa los pasajeros.
10. No robar la propiedad o la lengua de territorio del conductor o los pasajeros.
11. No llevar armas de cualquier tipo en los vehículos de la RCSC.
12. No ofender a otros pasajeros a través de la higiene personal inaceptable.
13. Para la salud y la seguridad del conductor y de los pasajeros, la expulsión de los excrementos corporales, ya sea voluntaria o involuntariamente, está prohibido.

El Senior Center Redwood Coast transporta pasajeros de acuerdo con estas pautas de conducta del pasajero asegurarse de que:

- ❖ El Senior Center Redwood Coast cumple con todas las regulaciones estatales y federales pertinentes que rigen el transporte público en general.
- ❖ Los jinetes del público en general y los empleados de la RCSC experimentan un servicio seguro, cómodo y fiable.

Es la intención de la RCSC para requerir a todos los pasajeros a cumplir con estas pautas de conducta de los pasajeros. En todos los casos, nuestros conductores a mantener plena discrecionalidad en la aplicación y cumplimiento de estas directrices. La aplicación de estas pasajeros realizar directrices pueden incluir, pero no se limita a:

- ❖ Solicitud de un pasajero siga todas las directrices aplicables
- ❖ Extracción de un pasajero del vehículo
- ❖ La suspensión temporal de los privilegios de un pasajero *
- ❖ La revocación de los privilegios de un pasajero de forma indefinida *

* Los infractores serán notificados por carta, si es posible, detallando la ofensa y la acción o acciones tomadas.

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

Per FTA Circular 4702.1B, “all recipients are required to prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, or national origin”:

- Active investigations conducted by FTA and entities other than FTA
- Lawsuits; and
- Complaints naming the recipient

Thus far, the Redwood Coast Senior Center has not received Title VI Investigations, Complaints or Lawsuits. Below is the list that will be used for tracking these incidents:

Investigations, Lawsuits and Complaints

	Date (Month, Day, Year)	Summary (Include basis of complaint: race, color, or national origin)	Status	Action(s) Taken
Investigations				
1.	N/A			
2.	N/A			
Lawsuits				
1.	N/A			
2.	N/A			
Complaints				
1.	N/A			
2.	N/A			

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Appendix F: Public Participation Plan

Summary of Outreach Efforts Made

In an effort to reach out to as many potential clients as possible, the Redwood Coast Senior Center promotes itself in the following ways:

- Their [Facebook](#) page
- Their website (<http://www.rcscenter.org/>)
- The phone book
- Word of mouth
- Their monthly newsletter
- Placement of brochures in places such as:
 - Nursing homes
 - Doctors' offices
 - Hospitals
 - Social Services
 - Restaurants
- Referrals from other agencies such as:
 - Nursing homes
 - Doctors' offices
 - Hospitals
 - Social Services

Outreach Plan to Engage Minority and LEP Populations

The Redwood Coast Senior Center reviewed the population data for the areas that it serves and found that the only statistically significant minority, and LEP, population is the Hispanic community. As such, the Center plans to increase their outreach efforts to further engage the Hispanic community. The Ukiah Senior Center will ensure that their Spanish brochures are placed in the various places listed above. They will also place their brochures in places often frequented by the Hispanic community such as:

- La Bamba Imports
- Zapateria La Mexicana
- Our Lady of Good Counsel Parish
- Mexican Restaurants

Appendix G: Letter Acknowledging Receipt of Title VI Complaint

Today's Date

Ms. Jane Doe
1234 Main St.
Fort Bragg, CA 95437

Dear Ms. Doe:

This letter is to acknowledge receipt of your complaint against the Redwood Coast Senior Center alleging

An investigation will begin shortly. If you have additional information you wish to convey or questions concerning this matter, please feel free to contact this office by telephoning (707) 964-0443, or write to:

Redwood Coast Senior Center
Attn: Title VI Coordinator
490 North Harold Street
Fort Bragg, CA 95437

Sincerely,

Redwood Coast Senior Center Title VI Coordinator

Appendix H: Letter of Finding (Notifying Complainant that Complaint Is Substantiated)

Today's Date

Ms. Jane Doe
1234 Main St.
Fort Bragg, CA 95437

Dear Ms. Doe:

The matter referenced in your letter of _____ (date) against the Redwood Coast Senior Center alleging a Title VI violation has been investigated.

(An/Several) apparent violation(s) of Title VI of the Civil Rights Act of 1964, including those mentioned in your letter (was/were) identified. Efforts are underway to correct these deficiencies.

Thank you for calling this important matter to our attention. You were extremely helpful during our review of this matter. ***(If a hearing is requested, the following sentence may be appropriate.)*** You may be hearing from this office, or from Federal authorities, if your services should be needed during the administrative hearing process.

Sincerely,

Redwood Coast Senior Center Title VI Coordinator

Appendix I: Closure Letter (Notifying Complainant that the Complaint Is Not Substantiated)

Today's Date

Ms. Jane Doe
1234 Main St.
Fort Bragg, CA 95437

Dear Ms. Doe:

The matter referenced in your complaint of _____ (date) against the Redwood Coast Senior Center alleging _____ has been investigated.

The results of the investigation did not indicate that the provisions of Title VI of the Civil Rights Act of 1964, have in fact been violated. As you know, Title VI prohibits discrimination based on race, color, or national origin in any program receiving Federal financial assistance.

The Redwood Coast Senior Center has analyzed the materials and facts pertaining to your case for evidence of the Redwood Coast Senior Center's failure to comply with any of the civil rights laws. There was no evidence found that any of these laws have been violated.

I therefore advise you that your complaint has not been substantiated, and that I am closing this matter in our files.

You have the right to appeal this decision within thirty calendar days of receipt of this final written decision from the Redwood Coast Senior Center.

Thank you for taking the time to contact us. If I can be of assistance to you in the future, do not hesitate to contact me.

Sincerely,

Redwood Coast Senior Center Title VI Coordinator

Appendix J

Caltrans Public Participation Survey

Participating Agency: Redwood Coast Senior Center

The following information is being collected by the California Department of Transportation (Caltrans) in order to comply with Title VI of the Civil Rights Act of 1964, *Nondiscrimination in Federally Assisted Programs*. Please take a few moments to complete the following questions. The data you provide will enable Caltrans to identify residents and communities impacted by federally funded projects/or activities. Please check the appropriate boxes with an "X" that best describes you and return the completed survey to the event coordinator. Submittal of this information is *voluntary*.

Sex

Male Female

Ethnicity

Hispanic or Latino Not Hispanic or Latino

Race

American Indian or Alaska Native
 Black or African American
 Native Hawaiian or other Pacific Islander
 Asian
 White
 Other: _____

Disability

Yes No

Age

Under 40 Over 40

Income

\$22,050 or Less
 Over \$22,051

Language

What language is primarily spoken in your household? _____

Categories and Definitions

The minimum categories for data on race and ethnicity for federal statistics, program administrative reporting, and civil rights compliance reporting are defined as follows:

- a. **American Indian or Alaska Native:** A person having origins in any of the original peoples of North and South America (including Central America), and who maintains tribal affiliation or community attachment.
- b. **Asian:** A person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.
- c. **Black or African American:** A person having origins in any of the black racial groups of Africa.
- d. **Hispanic or Latino:** A person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race.
- e. **Native Hawaiian or other Pacific Islander:** A person having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.
- f. **White:** A person having origins in any of the original peoples of Europe, the Middle East, or North Africa.

Appendix J

Caltrans Encuesta de Participación Pública

Agencia participante: Redwood Coast Senior Center

La siguiente información está siendo recopilada por el Departamento de Transporte de California (Caltrans) con el fin de cumplir con el Título VI del Acta de Derechos Civiles de 1964, No discriminación en los programas de asistencia federal. Por favor tómese unos minutos para completar las siguientes preguntas. Los datos que proporcione permitirá Caltrans para identificar los residentes y las comunidades afectadas por los proyectos financiados por el gobierno federal / o actividades. Por favor, marque las casillas correspondientes wiht una "X" que mejor te describes y devuelva la encuesta completada a la coordinadora del evento. La presentación de esta información es voluntario.

Sexo

Hombre Mujer

Etnicidad

Hispano or Latino No Hispano or Latino

Raza

- Indio Americano o Nativo de Alaska
- Americano Negro o Africano
- Hawaiano Nativo o otra Isla del Pacifico
- Asiático
- Blanco
- Otro: _____

Discapacidad

Sí No

Edad

Menos de 40 Más de 40

Ingresos

- \$22.050 o Menos
- Más de \$22.051

Idioma

¿Qué idioma se habla principalmente en su hogar? _____

Categorías y Definiciones

Las categorías mínimas para datos de raza y origen étnico de las estadísticas federales, informes administrativos del programa, y los informes de cumplimiento de los derechos civiles se definen como sigue:

- a. **Indio Americano o Nativo de Alaska:** Una persona que tiene orígenes en cualquiera de los pueblos originales de Norte y Sudamérica (incluyendo América Central), y que mantiene una afiliación tribal o de comunidad.
- b. **Asiático:** Una persona que tiene orígenes en cualquiera de los pueblos originales del Lejano Oriente, Sureste de Asia o el subcontinente indio, incluyendo, por ejemplo, Camboya, China, India, Japón, Corea, Malasia, Pakistán, las Filipinas, Tailandia y Vietnam.
- c. **Americano Negro o Africano:** Una persona que tiene orígenes en cualquiera de los grupos raciales negros de África.
- d. **Hispano or Latino:** Una persona de origen Cubano, Mexicano, Puertorriqueño, Centro o Sudamericano o de otra cultura u origen Español, sin importar la raza.
- e. **Hawaiano Nativo o otra Isla del Pacífico:** Una persona que tiene orígenes en cualquiera de los pueblos originales de Hawaii, Guam, Samoa u otras Islas del Pacífico.
- f. **Blanco:** Una persona que tiene orígenes en cualquiera de los pueblos originales de Europa, el Medio Oriente o África del Norte.

Appendix K
Training Materials

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POLICY AND PROCEDURES FOR INTERACTIONS WITH LEP PERSONS

POLICY:

The Redwood Coast Senior Center will take reasonable steps to ensure that persons with Limited English Proficiency (LEP) have meaningful access and an equal opportunity to participate in our services, activities, programs and other benefits. The policy of the Redwood Coast Senior Center is to ensure meaningful communication with LEP clients and their representatives. All interpreters, translators and other aids needed to comply with this policy shall be provided without cost to the person being served, and clients will be informed of the availability of such assistance free of charge.

Language assistance will be provided through use of competent bilingual staff and arrangements with local organizations providing interpretation or translation services. All staff will be provided notice of this policy and procedure, and staff that may have direct contact with LEP individuals will be trained in effective communication techniques.

PROCEDURES:

1. IDENTIFYING LEP PERSONS AND THEIR LANGUAGE

The Redwood Coast Senior Center will promptly attempt to identify the language and communication needs of the LEP person. If necessary, staff will use a language identification card (the "I Speak" cards). In addition, when records are kept of past interactions with clients the language used to communicate with the LEP person will be included as part of the record.

2. OBTAINING A QUALIFIED INTERPRETER

Redwood Coast Senior Center staff is responsible for maintaining an accurate and current list showing the name, language, phone number and hours of availability of bilingual resources (including staff). Staff is also responsible for contacting the appropriate bilingual resource to interpret, in the event that an interpreter is needed;

If the LEP person's native language is Spanish, utilize the Center's Spanish speaking employees for any communication needs. If the employees are unavailable, call the Safe Passage Family Resource Center for assistance.

If the LEP person's native language is not English or Spanish, contact the Mendocino County Social Services for available resources. If no resources are available, document the interaction so that resources for the particular language will be available in the future.

3. DOCUMENTING INTERACTIONS WITH LEP PERSONS

When Redwood Coast Senior Center staff interacts with a LEP person, they must document the encounter using the LEP Documentation Form. This will help the Center track which languages may be needed in the future to assist LEP clients.

LEP Documentation Form

Date of Contact: _____

Location of Contact: _____

Name of staff member filling out form: _____

Indicate language of LEP person: SPANISH Other: _____

How were the LEP language needs met? _____

Please describe the nature of the LEP person's visit: _____

Were their needs met by the end of the visit? Yes No

<input type="checkbox"/> ضع علامة في هذا المربع إذا كنت تقرأ أو تتحدث العربية.	1. Arabic
<input type="checkbox"/> Մարդկանք կրնան «նշանակ» կամ «արտահայտվել» լեզուներով, կամ լեզուներով նշանակվել:	2. Armenian
<input type="checkbox"/> যদি আপনি বাংলা পড়েন বা বলেন তা হলে এই বক্সে দাগ দিন।	3. Bengali
<input type="checkbox"/> ល្អប្រសើរណាស់បើអ្នកនិយាយ: ប្រើអក្សរសាស្ត្រ ខ្មែរ ។	4. Cambodian
<input type="checkbox"/> Motka i kahhon ya yangin ñntüñgnu' manaitai pat ñntüñgnu' kumentos Chamorro.	5. Chamorro
<input type="checkbox"/> 如果你能读中文或讲中文，请选择此框。	6. Simplified Chinese
<input type="checkbox"/> 如果你能读中文或讲中文，请选择此框。	7. Traditional Chinese
<input type="checkbox"/> Označite ovaj kvadratić ako čitate ili govorite hrvatski jezik.	8. Croatian
<input type="checkbox"/> Zaškrtněte tuto kolonku, pokud čtete a hovoříte česky.	9. Czech
<input type="checkbox"/> Knus dit vakje aan als u Nederlands kunt lezen of spreken.	10. Dutch
<input type="checkbox"/> Mark this box if you read or speak English.	11. English
<input type="checkbox"/> اگر خواندن و نوشتن فارسی، بلد هستید این مربع را علامت بزنید.	12. Farsi

<input type="checkbox"/> Cocher ici si vous lisez ou parlez le français.	13. French
<input type="checkbox"/> Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen.	14. German
<input type="checkbox"/> Σημειώστε αυτό το πλαίσιο αν διαβάζετε ή μιλάτε Ελληνικά.	15. Greek
<input type="checkbox"/> Make kazyé sa a si ou li oswa ou pale kreyòl ayisyen.	16. Haitian Creole
<input type="checkbox"/> अगर आप हिन्दी बोलते या पढ़ सकते हैं तो इस बक्स पर चिह्न लगाएँ।	17. Hindi
<input type="checkbox"/> Kos lub voj no yog koj paub twm thiab hais lus Hmoob.	18. Hmong
<input type="checkbox"/> Jelölje meg ezt a kockát, ha megérti vagy beszéli a magyar nyelvet.	19. Hungarian
<input type="checkbox"/> Markaam daytoy nga kahon no makabasa wenno makasaoka iti Ilocano.	20. Ilocano
<input type="checkbox"/> Marchi questa casella se legge o parla italiano.	21. Italian
<input type="checkbox"/> 日本語を購んだり、話せる場合はここに印を付けてください。	22. Japanese
<input type="checkbox"/> 한국어를 읽거나 말할 수 있으면 이 칸에 표시하십시오.	23. Korean
<input type="checkbox"/> ພ້ອມເຂົ້າຂອງ ຕົວນິທະຍານຸກົມພາສາ.	24. Laotian
<input type="checkbox"/> Prosimy o zaznaczenie tego kwadratu, jeżeli posługuje się Pan/Pani językiem polskim.	25. Polish

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<input type="checkbox"/>	Assinale este quadrado se você lê ou fala português.	26. Portuguese
<input type="checkbox"/>	Încercăți accesați câmpul dacă citiți sau vorbiți românește.	27. Romanian
<input type="checkbox"/>	Пометьте этот квадратик, если вы читаете или говорите по-русски.	28. Russian
<input type="checkbox"/>	Обележите ovaj kvadratić ukoliko čitate или говорите српски језик.	29. Serbian
<input type="checkbox"/>	Označte tento štvorček, ak viete čítať alebo hovoriť po slovensky.	30. Slovak
<input type="checkbox"/>	Marque esta casilla si lee o habla español.	31. Spanish
<input type="checkbox"/>	Markahan itong kuwadrado kung kayo ay marunong magbasa o magsalita ng Tagalog.	32. Tagalog
<input type="checkbox"/>	ใช้การคลิกวงกลมในช่องถ้าท่านสามารถพูดภาษาไทย.	33. Thai
<input type="checkbox"/>	Maaka 'i he puha ni kapau 'oku ke lau pe lea fakatonga.	34. Tongan
<input type="checkbox"/>	Відмітьте цю клітинку, якщо ви читаете або говорите українською мовою.	35. Ukrainian
<input type="checkbox"/>	اگر آپ اردو پڑھتے یا بولتے ہیں تو اس خانے میں نشان لگائیں۔	36. Urdu
<input type="checkbox"/>	Xin đánh dấu vào ô này nếu quý vị biết đọc và nói được Việt Ngữ.	37. Vietnamese
<input type="checkbox"/>	באמצעות דעם קעסטל אויב איר לייענט אדער רעדט אידיש.	38. Yiddish

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Appendix L: 2012-2016 American Community Survey 5-Year Estimates

2012-2016 American Community Survey 5-Year Estimates					
Language Spoken at Home	Caspar CDP	Cleone CDP	Fort Bragg City	Mendocino CDP	Total
Total:	782	529	6,806	740	8,857
<u>5 to 17 Years</u>	52	30	1,318	27	1,427
English only:	52	30	607	27	716
Spanish	0	0	649	0	649
<i>Speak English less than "very well"</i>	0	0	91	0	91
Other Indo-European languages:	0	0	62	0	62
<i>Speak English less than "very well"</i>	0	0	62	0	62
Asian and Pacific Island languages:	0	0	0	0	0
<i>Speak English less than "very well"</i>	0	0	0	0	0
Other languages:	0	0	0	0	0
<i>Speak English less than "very well"</i>	0	0	0	0	0
<u>18 to 64 Years</u>	410	366	4,239	505	5,520
English only:	409	274	2,694	423	3,800
Spanish	0	92	1,426	0	1,518
<i>Speak English less than "very well"</i>	0	80	1,047	0	1,127
Other Indo-European languages:	0	0	100	82	182
<i>Speak English less than "very well"</i>	0	0	12	22	34
Asian and Pacific Island languages:	0	0	19	0	19
<i>Speak English less than "very well"</i>	1	0	0	0	1
Other languages:	0	0	0	0	0
<i>Speak English less than "very well"</i>	0	0	0	0	0
<u>65 Years and over</u>	320	133	1,249	208	1,910
English only:	320	133	1,214	208	1,875
Spanish	0	0	15	0	15
<i>Speak English less than "very well"</i>	0	0	15	0	15
Other Indo-European languages:	0	0	8	0	8
<i>Speak English less than "very well"</i>	0	0	0	0	0
Asian and Pacific Island languages:	0	0	3	0	3
<i>Speak English less than "very well"</i>	0	0	3	0	3
Other languages:	0	0	9	0	9
<i>Speak English less than "very well"</i>	0	0	0	0	0

Sources:

"2012-2016 American Community Survey 5-Year Estimates: Age by Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over" for Caspar CDP, Cleone CDP, Fort Bragg City, and Mendocino CDP

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**Appendix M: 2011-2015 American Community Survey 5-year Estimates:
Language Spoken at Home By Ability to Speak English for the Population 5 Years
and Over**

	Caspar CDP	Cleone CDP	Fort Bragg City	Mendocino CDP	Combined Populations	% of Population
Total:	743	586	6,607	684	8,620	100.0%
Speak only English	742	430	4,354	615	6,141	71.2%
Spanish or Spanish Creole:	0	156	1,984	0	2,140	24.8%
Speak English "very well"	0	38	938	0	976	11.3%
Speak English less than "very well"	0	118	1,046	0	1,164	13.5%
French (incl. Patois, Cajun):	0	0	40	15	55	0.6%
Speak English "very well"	0	0	32	15	47	0.5%
Speak English less than "very well"	0	0	8	0	8	0.1%
French Creole:	0	0	0	0	0	0.0%
Speak English "very well"	0	0	0	0	0	0.0%
Speak English less than "very well"	0	0	0	0	0	0.0%
Italian:	0	0	16	0	16	0.2%
Speak English "very well"	0	0	16	0	16	0.2%
Speak English less than "very well"	0	0	0	0	0	0.0%
Portuguese or Portuguese Creole:	0	0	7	0	7	0.1%
Speak English "very well"	0	0	7	0	7	0.1%
Speak English less than "very well"	0	0	0	0	0	0.0%
German:	0	0	8	0	8	0.1%
Speak English "very well"	0	0	8	0	8	0.1%
Speak English less than "very well"	0	0	0	0	0	0.0%
Yiddish:	0	0	0	0	0	0.0%
Speak English "very well"	0	0	0	0	0	0.0%
Speak English less than "very well"	0	0	0	0	0	0.0%
Other West Germanic languages:	0	0	0	21	21	0.2%
Speak English "very well"	0	0	0	21	21	0.2%
Speak English less than "very well"	0	0	0	0	0	0.0%
Scandinavian languages:	0	0	18	0	18	0.2%
Speak English "very well"	0	0	18	0	18	0.2%
Speak English less than "very well"	0	0	0	0	0	0.0%
Greek:	0	0	0	0	0	0.0%
Speak English "very well"	0	0	0	0	0	0.0%
Speak English less than "very well"	0	0	0	0	0	0.0%
Russian:	0	0	19	0	19	0.2%
Speak English "very well"	0	0	19	0	19	0.2%
Speak English less than "very well"	0	0	0	0	0	0.0%
Polish:	0	0	83	0	83	1.0%
Speak English "very well"	0	0	83	0	83	1.0%
Speak English less than "very well"	0	0	0	0	0	0.0%
Serbo-Croatian:	0	0	0	0	0	0.0%
Speak English "very well"	0	0	0	0	0	0.0%

Speak English less than "very well"	0	0	0	0	0	0.0%
Other Slavic languages:	0	0	0	0	0	0.0%
Speak English "very well"	0	0	0	0	0	0.0%
Speak English less than "very well"	0	0	0	0	0	0.0%
Armenian:	0	0	0	0	0	0.0%
Speak English "very well"	0	0	0	0	0	0.0%
Speak English less than "very well"	0	0	0	0	0	0.0%
Persian:	0	0	0	0	0	0.0%
Speak English "very well"	0	0	0	0	0	0.0%
Speak English less than "very well"	0	0	0	0	0	0.0%
Gujarati:	0	0	0	0	0	0.0%
Speak English "very well"	0	0	0	0	0	0.0%
Speak English less than "very well"	0	0	0	0	0	0.0%
Hindi:	0	0	0	22	22	0.3%
Speak English "very well"	0	0	0	9	9	0.1%
Speak English less than "very well"	0	0	0	13	13	0.2%
Urdu:	0	0	0	0	0	0.0%
Speak English "very well"	0	0	0	0	0	0.0%
Speak English less than "very well"	0	0	0	0	0	0.0%
Other Indic languages:	0	0	13	11	24	0.3%
Speak English "very well"	0	0	13	11	24	0.3%
Speak English less than "very well"	0	0	0	0	0	0.0%
Other Indo-European languages:	0	0	0	0	0	0.0%
Speak English "very well"	0	0	0	0	0	0.0%
Speak English less than "very well"	0	0	0	0	0	0.0%
Chinese:	1	0	0	0	1	0.0%
Speak English "very well"	0	0	0	0	0	0.0%
Speak English less than "very well"	1	0	0	0	1	0.0%
Japanese:	0	0	15	0	15	0.2%
Speak English "very well"	0	0	0	0	0	0.0%
Speak English less than "very well"	0	0	15	0	15	0.2%
Korean:	0	0	0	0	0	0.0%
Speak English "very well"	0	0	0	0	0	0.0%
Speak English less than "very well"	0	0	0	0	0	0.0%
Mon-Khmer, Cambodian:	0	0	0	0	0	0.0%
Speak English "very well"	0	0	0	0	0	0.0%
Speak English less than "very well"	0	0	0	0	0	0.0%
Hmong:	0	0	0	0	0	0.0%
Speak English "very well"	0	0	0	0	0	0.0%
Speak English less than "very well"	0	0	0	0	0	0.0%
Thai:	0	0	0	0	0	0.0%
Speak English "very well"	0	0	0	0	0	0.0%
Speak English less than "very well"	0	0	0	0	0	0.0%
Laotian:	0	0	0	0	0	0.0%
Speak English "very well"	0	0	0	0	0	0.0%
Speak English less than "very well"	0	0	0	0	0	0.0%

Vietnamese:	0	0	14	0	14	0.2%
Speak English "very well"	0	0	0	0	0	0.0%
Speak English less than "very well"	0	0	14	0	14	0.2%
Other Asian languages:	0	0	0	0	0	0.0%
Speak English "very well"	0	0	0	0	0	0.0%
Speak English less than "very well"	0	0	0	0	0	0.0%
Tagalog:	0	0	26	0	26	0.3%
Speak English "very well"	0	0	26	0	26	0.3%
Speak English less than "very well"	0	0	0	0	0	0.0%
Other Pacific Island languages:	0	0	0	0	0	0.0%
Speak English "very well"	0	0	0	0	0	0.0%
Speak English less than "very well"	0	0	0	0	0	0.0%
Navajo:	0	0	0	0	0	0.0%
Speak English "very well"	0	0	0	0	0	0.0%
Speak English less than "very well"	0	0	0	0	0	0.0%
Other Native North American languages:	0	0	0	0	0	0.0%
Speak English "very well"	0	0	0	0	0	0.0%
Speak English less than "very well"	0	0	0	0	0	0.0%
Hungarian:	0	0	0	0	0	0.0%
Speak English "very well"	0	0	0	0	0	0.0%
Speak English less than "very well"	0	0	0	0	0	0.0%
Arabic:	0	0	0	0	0	0.0%
Speak English "very well"	0	0	0	0	0	0.0%
Speak English less than "very well"	0	0	0	0	0	0.0%
Hebrew:	0	0	0	0	0	0.0%
Speak English "very well"	0	0	0	0	0	0.0%
Speak English less than "very well"	0	0	0	0	0	0.0%
African languages:	0	0	10	0	10	0.1%
Speak English "very well"	0	0	10	0	10	0.1%
Speak English less than "very well"	0	0	0	0	0	0.0%
Other and unspecified languages:	0	0	0	0	0	0.0%
Speak English "very well"	0	0	0	0	0	0.0%
Speak English less than "very well"	0	0	0	0	0	0.0%

Source:

“2011-2015 American Community Survey 5-Year Estimates: Language Spoken at Home By Ability to Speak English for the Population 5 Years and Over” for Caspar CDP, Cleone CDP, Fort Bragg City, and Mendocino CDP