



TITLE VI PROGRAM

Developed: 6/10/2014

**Approved by the Board of Directors of Easter Seals
Superior California: 6/26/2014**

EASTER SEALS SUPERIOR CA
3205 HURLEY WAY
SACRAMENTO, CA 95864
PH: (916) 485-6711
www.myeasterseals.org

INTRODUCTION

This document was prepared by Easter Seals Superior California and approved by its Board of Directors to comply with Title VI of the Civil Rights Act of 1964, including new provisions detailed in U.S. Department of Transportation's FTA Circular 4702.1B, "Title VI Requirement and Guidelines for Federal Transit Administration Recipients."



Table of Contents

Title VI Notice to the Public	Pg. 3
List of Locations Where Title VI Notice Is Posted	Pg. 5
Title VI Complaint Procedures	Pg. 6
Title VI Complaint Form	Pg. 7
List of Transit-Related Title VI Investigations, Complaints, and Lawsuits	Pg. 12
Public Participation Plan	Pg. 13
Summary of Outreach Efforts	Pg. 15
Language Assistance Plan	Pg. 17
Four Factor Analysis	Pg. 19
Table Depicting the Membership of Non-Elected Committees And Councils	Pg. 27
Title VI Equity Analysis	Pg. 27
Board of Directors Approval of Title VI Program	Pg. 28



Easter Seals Superior California

Title VI Notice to the Public

Notifying the Public of Rights Under Title VI

Easter Seals Superior California

- Easter Seals 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 Easter Seals.

- For more information on Easter Seals civil rights program, and the procedures to file a complaint, contact (916) 485-6711, or visit our administrative office at 3205 Hurley Way, Sacramento, CA 95864. For more information, visit www.myeasterseals.org.

- A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590

- If information is needed in another language, contact (916) 485-6711



Notificar al público de los derechos bajo el título VI Easter Seals Superior California

- Easter Seals 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 Easter Seals.
- Para obtener más información sobre el programa derechos civiles capaz de industrias y el procedimientos para presentar una queja, llame al (916) 485-6711, o visite nuestra oficina administrativa en 3205 Hurley Way Sacramento, CA 95864. Para más información información, visite www.myeasterseals.org.
- Un demandante puede presentar una queja directamente con el Federal Transit Administration por archivar una queja con la Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590
- Si se necesita información en otro idioma, contacte al (916) 485-6711.



List of Locations Where Title VI Notice Is Posted

Easter Seals Title VI notice to the public is currently posted at the following locations:

Location Name	Address	City
Website	www.myeasterseals.org	
Easter Seals Buses	16 Business Park Way	Sacramento
Easter Seals Buses	1670 Sierra	Yuba City
Easter Seals Corporate	3205 Hurley Way	Sacramento
Easter Seals ACE IT III	1670 Sierra	Yuba City

The Title VI notice and program information is also provided on the Easter Seals website at www.myeasterseals.org under contact/questions.



Title VI Complaint Procedures

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

Within 10 business days of receiving the complaint, Easter Seals Superior California 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. Easter Seals Superior California 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, Easter Seals Superior California 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 Easter Seals Superior California 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.



Easter Seals Superior California Title VI Complaint Form

COMPLAINT FORM

Section I: Please write legibly		
1. Name:		
2. Address:		
3. Telephone:	3.a. Secondary Phone (Optional):	
4. Email Address:		
5. Accessible Format Requirements?	<input type="checkbox"/> Large Print	<input type="checkbox"/> Audio Tape
	<input type="checkbox"/> TDD	<input type="checkbox"/> Other
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 (check all that apply):		
<input type="checkbox"/> Race	<input type="checkbox"/> Color	<input type="checkbox"/> National Origin
12. Date of alleged discrimination: (mm/dd/yyyy)		
13. Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known), as well as names and contact information of any witnesses. If more space is needed, please attach additional sheets of paper.		

Easter Seals Superior California Title VI Complaint Form, Page 2

COMPLAINT FORM

Section IV:

14. Have you previously filed a Title VI complaint with Easter Seals Superior California?

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:

Easter Seals Superior California, Title VI Coordinator

3205 Hurley Way

Sacramento, CA 95864



Titulo VI Procedimiento de Queja

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

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

En un periodo de 10 días de haber recibido la demanda, Easter Seals Superior California 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. Easter Seals Superior California tiene 30 días para investigar la queja.

Si necesita mas información para resolver el caso, Easter Seals Superior California 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: Escribir en forma legible		
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.		

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

Usted puede conectar cualquier material escrito u otra información que crees que es pertinente a su queja.

Firma y fecha están especificadas a continuación completar el formulario:

Signature _____ Date _____

Por favor envíe este formulario en persona o por correo este formulario a la siguiente dirección:
Easter Seals Superior California, Coordinador del título VI
3205 Hurley Way
Sacramento, CA 95864



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

Easter Seals Superior California has not been involved in any transportation-related Title VI investigations, lawsuits or complaints.

Easter Seals Superior California's 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

Easter Seals Superior California is a non-profit 501 c (3) organization that provides a wide range of therapies and programs to people of all ages. Easter Seals Superior California proudly serves 13 counties including Alpine, Amador, Calaveras, El Dorado, Nevada, Placer, Sacramento, San Joaquin, Stanislaus, Sutter, Tuolumne, Yolo, and Yuba. We have offices located in Stockton, Sacramento, and Yuba City to serve the members of these communities.

Easter Seals offers a warm water therapeutic pool program for all ages at its Sacramento location. **The pool** which is kept between 91-94 degrees allows therapists to use the properties of water, such as temperature, buoyancy, hydrostatic pressure, and resistance for therapeutic purposes.

Our **Pediatric department** proudly offers **speech, occupational, child development and physical therapy** treatment and intervention for children from birth through school ages that have a significant delay in at least one developmental area or are at risk for having a developmental disability. **Feeding Clinic** Therapy is also offered and provides a comprehensive oral feeding, swallowing and mealtime assessment to aide families in understanding their child's feeding problems and then trains them on the necessary techniques to advance their child's feeding skills.

SuitAbility is our dynamic and intensive intervention program for children with cerebral palsy and other neuromuscular disorders. Utilization of a TheraSuit makes it possible for children with cerebral palsy and other central nervous system dysfunction to walk and control specific motor functions.

Easter Seals Superior California **Adult Services** offers three **adult day programs** in the Sacramento area and one in Yuba City. All are licensed by the State of California. Our **ACE IT I** Program (Access to the Community through Education, Integration and Technology I), our **ACE IT II** Program (Access to the Community through Education, Integration and Technology II), and our **FILS** Program (Functional Integrated Living Skills) all serve adults with developmental disabilities in exciting and energetic atmospheres. The general community is the classroom where participants are working on Independent Living, Social, Recreational and Vocational Skills. Each program operates in a different area of Sacramento and utilizes the local

community resources to teach each participant to be as independent as they can be. These programs work and volunteer out in the community. Our ACE IT Programs operate at a 1:4 staff to client ratio, while our FILS Program operates at a 1:3 staff to client ratio. The FILS program accepts clients with greater needs.

In Yuba City, Easter Seals is proud to offer our **ACE IT III** Program (Access to the Community through Education, Integration and Technology III). Similar in kind to the other ACE IT Programs, this program which operates at a 1:3 staff to client ratio, teaches each participant to be as independent as they can be while exercising their right to choose activities and goals. ACE IT III is also known for their unique art program, fine arts studio as well as their performing arts activities. Its participants tend to be more medically fragile.

Our **HTR** Program (Help to Recovery) is an Adult Day Health Care program for adults who have suffered either an acquired or traumatic brain injury. HTR is licensed through the California Department of Aging, Adult Day Health Care/ community based adult services. Services offered are through a multidisciplinary approach and include nursing, Medical Social Work, Activities, Physical Therapy, Occupational Therapy, Speech Therapy and Nutrition. HTR offers a consistent stable environment that treats the whole person and offers family support to assist the client in reintegrating back into their lives. HTR is active in the community and partners with other Easter Seals programs to offer its clients the best experience possible.

Easter Seals Enterprises provides adults with a variety of disabilities the opportunity to learn vocational skills while earning a paycheck. ESE has several components: Custodial Services, Contract Solutions, Landscaping Services, Food Services, and Work Crews. All focus on teaching individuals vocational skills and appropriate work behavior, thus leading to greater independence.

Services for the ACE IT, FILS and Easter Seals Enterprise programs are purchased by Alta California Regional Center. This agency refers eligible consumers to enroll in the programs and is the sole referral agency for ACE IT, FILS and ESE. The HTR program is an ADHC and receives funding from MediCal and referrals from local hospitals and HMO's. These programs do not serve the general public and they work in conjunction with ACRC, the HMO's and other agencies to achieve various outreach opportunities.

The Easter Seals Adult Services program participants have developmental as well as acquired disabilities and range in their functioning levels and abilities. Many of our participants require a high level of supervision and **have little to no literacy skills**. Generally, any **documents presented to participants are translated orally** due to the level of disability. Additionally, participants have not mastered basic work skills and are unable to earn a supporting income. Currently, 81% of Easter Seals Superior California participants receive SSI benefits, which are largely determined by limited resources and income.

The programs provide limited transportation to and from the program sites daily and conduct community integration trips with various participants throughout the day. Each program is licensed to serve a maximum of 36-60 consumers. Given the relatively small size of the programs and their limited exposure, the scope and provision of the transportation service would have an insignificant impact on the general public, minority and low-income populations in the geographic area. This agency, however, does maintain systems to gather stakeholder input

regarding agency services and conducts public relations and outreach activities in order to create meaningful opportunities for public engagement as outlined below.

Purposes of this Plan

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

Summary of Outreach Efforts

The following is a summary of outreach efforts conducted by Easter Seals Superior California as they relate to Title VI requirements under the Public Participation Plan. Many of our activities are conducted in partnership or ad hoc outreach with other service organizations and non-profit agencies within the community. This is in no way a complete list but rather documents the agency's outreach efforts as they relate specifically to minority and low-income populations.

Board Meetings Open to the Public

Easter Seals Superior California conducts monthly Board meetings that are open to the public and announced on the agency's website. Annually, Easter Seals Superior California holds its Board meeting/banquet at which consumers, staff and community members are recognized for their achievements and service to the agency. Each year, a child and adult ambassador is chosen from among those who engage our services. These individuals will represent the agency at public events throughout the following year.

Alta California Regional Center Resource Fair

Easter Seals Superior California participates annually in the Alta California Regional Center Resource Fair. This event is designed to connect families of children with disabilities who are preparing to leave school and enter adulthood to service providers and training programs such as Easter Seals Adult Services programming. The event typically attracts 75-100 guests and is translated in Spanish with a live interpreter in order to reach Limited English Proficient individuals.

Warmline Family Resource Center

Easter Seals Superior California maintains a partnership with the Warmline Family Resource Center providing resources and support to families and children with special needs from birth to 22 years.

Molina Health Care Community Partner

Easter Seals Superior California has partnered with Molina Health care to raise awareness of the underserved and the disabled. Easter Seals' Chief Marketing and Donor Relations officer speaks at various events and outreach activities.

Chamber of Commerce Memberships

Easter Seals Superior California is an active member of the Sacramento Metro, the Sacramento Asian Pacific and the California Chambers of commerce.

Rotary Club Memberships

Easter Seals Superior California maintains on-going partnership with the Carmichael Rotary, the North Highlands Rotary, and the Sacramento Rotary Clubs and is able to provide coordinated transportation assistance via the agency's FTA 5310 vehicle. Additionally, several members of the Easter Seals Superior California staff maintain membership with the Carmichael Rotary Club, which serves low-income and minority populations.

Easter Seals Superior California Annual Open House

Easter Seals Superior California hosts an Open House and Awards Ceremony annually at its various programs to recognize the achievements of both program participants and members of the community. This is a public event that is publicized with press releases to a number of various media outlets and also serves as a forum for public input. This event typically attracts 80-100 guests.

Annual Satisfaction Surveys

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

Food, Clothing and Toy Drives

Annually, Easter Seals Superior California conducts food, clothing and toy drives to connect with and benefit low-income populations. These events are organized by our pediatric department and publicized through press releases to various media outlets and flyers. The toys, clothing and meals are then delivered by the Pediatric therapists.

Easter Seals Superior California Website

Currently, Easter Seals Superior California posts agency news, upcoming events, notices and announcement on the agency's website. Questions, comments, or concerns can be noted in the Contact Us section. Anyone wishing to fill out a Title VI Complaint Form, which is available as a download in English and Spanish, may also do so under the Contact heading.

Easter Seals Superior California maintains a Marketing Department that sets annual marketing and outreach goals. The marketing team conducts various comprehensive outreach activities throughout the year including public engagements, newsletters, open houses and press releases.

The Vision Team, meets on a monthly basis and is responsible for making sure that the current goals of the agency are being met. They also chart the course for the agency's future operational initiatives.



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 Easter Seals Superior California, activities or services.
- **Factor 2:** The frequency with which LEP persons come in contact with Easter Seals Superior California, activities or services.
- **Factor 3:** The nature and importance of programs, activities or services provided by Easter Seals Superior California to the LEP population.
- **Factor 4:** The resources available to Easter Seals Superior California 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. Easter Seals Superior California language assistance plan (LAP) includes a four factor analysis and implementation plan that complies with the requirements of DOT LEP guidance.



Four Factor Analysis

Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by Easter Seals Superior California.

Easter Seals Superior California 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 adults with disabilities where current public transit options are insufficient or do not exist. Eligible program participants or "riders" must be referred into the programs from ACRC and by local hospitals for our HTR program. As such, Easter Seals Superior California does not offer transportation to the general public other than in situations involving a coordinated plan with other entities. Therefore, an analysis of public demographic data in Sacramento and Yuba/Sutter Counties does not represent actual populations served by this program but is offered for comparison purposes only.

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

American Community Survey

The U.S. Census Bureau 2008-2012 American Community Survey (ACS) Language Spoken at Home by the Ability to Speak English estimates that of the 1,630,821 Sacramento and Yuba/Sutter County residents, 231,395 speak Spanish at home and 37,328, 17%, speak English less than "very well". All other non-English languages resulted in approximately 10% of the population.

Sacramento and Yuba/Sutter Counties, California	Estimate	Percentage
Total:	1,630,821	100%
Speak only English	1,235,170	75%
Speak Spanish	231,395	15%
Speak English "very well"	126,397	48%
Speak English less than "very well".	37,328	17%

Alta California Regional Center (ACRC) Expenditures

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

The report indicates that authorized services for ages 22 and older in FY 2012-2013 totaled \$194,824,592. Of that total, \$179,598,955 (92%) was spent on English speaking consumers and \$3,936,486 (2%) was spent on Spanish speaking consumers.

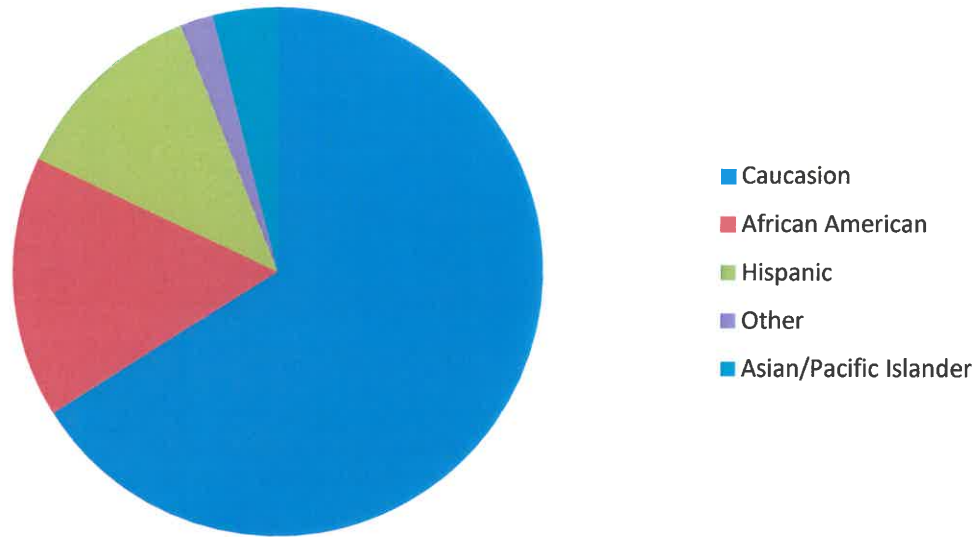
Authorized Services by Language	Amount	Percent
Total Authorized Services Purchased	\$194,824,592	100%
English	\$179,598,955	92%
Spanish	\$3,936,486	2%

By comparison, the Easter Seals Superior California Adult Services revenue received from ACRC in FY 2012-2013 amounts to approximately 4% of the total ACRC authorized services purchased. Theoretically, if this percentage were applied to the services purchased for Spanish speaking consumers (\$3,936,486) it would equate to the revenue necessary to provide service to only **10** Easter Seals Superior California consumers. If it is assumed that these ten consumers speak Spanish as a primary language, it remains unclear how many would speak English less than "very well".

Historical Analysis of LEP Persons Served by Easter Seals Superior California

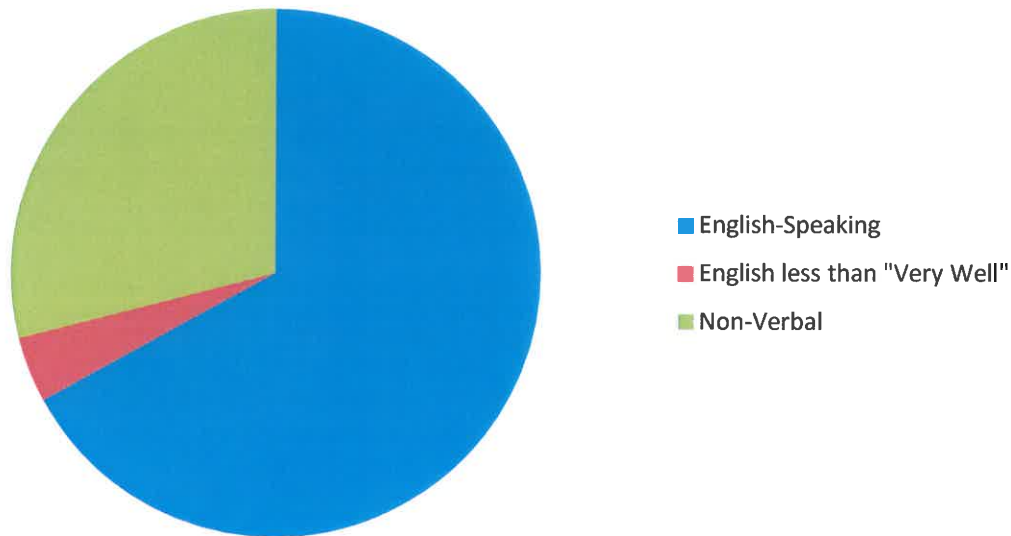
A final source of data to be considered to determine the number of LEP persons likely to be served by this program is a client-by-client analysis of all consumers served in the 26 year history of Adult Services. Easter Seals Superior California, Adult Services, has served a total of 379 persons from 2010-2014 including the consumers currently enrolled. Of that total, 12% are listed as Hispanic and 66% are listed as Caucasian. Other ethnicities were less than .1%.

Easter Seals Clients by Ethnicity



In an analysis of the language proficiency of the Hispanic population currently being served, 60% speak English "very well" and 30% are non-verbal due to their disability and 20% or 2 clients currently being served speak English less than "very well".

Hispanic Language Proficiency



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

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

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

As indicated above, contact with LEP consumers is limited in our programs. Currently, Easter Seals Superior California employs a bi-lingual receptionist to field all reception calls so no calls go unanswered. This data has just started to be collected so Easter Seals Superior California can accurately capture how many calls per week are coming in from LEP persons.

In a similar survey Easter Seals Superior California, Adult Services program staff revealed that they **never** receive phone calls from LEP persons and have encountered only five family members of consumers who were LEP within the last year. ACRC counselors, friends of the family, and Easter Seals staff may all act as interpreters, depending upon preference.

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

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

The primary purpose of Easter Seals Superior California's Adult Services programming is to provide training opportunities that foster personal growth for individuals with disabilities. Transportation during community integration training is offered daily as a part of the service in addition to transportation to/from the program as contracted through ACRC. Annual consumer satisfaction surveys indicate that transportation for program as well as for community integration activities is an important part of the services offered for consumers. Currently, Easter Seals Superior California serves 379 consumers in six adult programs. The length of time an individual is typically enrolled in the program can range from a few months to many years. Consumers are not required to "graduate" and may remain in the program as long as their needs can continue to be met.

While, each program at Easter Seals Superior California is relatively small and is not an "essential" program, it does create opportunities that can enhance the quality of life for adults with disabilities.

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

Easter Seals Superior California operating budget does not have a specific line item for providing language access and outreach. Outreach expenses as they relate to LEP populations are split among several departments depending on which department is responsible for the outreach. Costs for translation of documents is minimal and has not been quantified. The majority of larger expenses are allocated to annual Open Houses and print/email marketing. Significant outreach budget allocations for the entire agency this fiscal year include but are not limited to:

- Redesign of agency web page: \$20,000+
- Ads in local publications and email blasts: \$12,000
- Annual Open Houses for six facilities: \$10,500

The budget for Easter Seals Superior California, which provides services through the FTA 5310 grant, is a small fraction of the agency's budget. The total annual expenditures for Easter Seals Superior California's outreach activities approximately \$7500. This includes an annual public Open House and bi-annual newsletters. Outreach specific to LEP populations has not been conducted, as a reasonably significant numbers of LEP persons have not been served by Easter Seals, as indicated in Factor 1 and those needing our services seem to be captured using our regular outreach methods.

The rates for purchase of service that Easter Seals Superior California receives from ACRC were originally set in 1998. These rates were set with the cost-of-living index from 1998 and have not increased in the last 16 years, while the cost of living has continued to rise. In fact, rates, and subsequently the program's revenue, were reduced for a number of years by up to 4.25%, further compounding the effects of a rate system that has not grown with the economy. Several cost-cutting measures have been implemented in order to remain financially solvent, including areas such as advertising and outreach.



SUMMARY

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

- It is likely that ACRC provided funding for only 10 consumers that spoke Spanish as a primary language in the 2012-2013 fiscal year. English proficiency of those 10 is unknown.
- No "true" LEP persons have been served by Adult Services in the last 4 years.
- Language proficiency is primarily affected by disability rather than a language barrier alone.
- No consumers were underserved or exited the program due to language barriers.
- Surveyed staff reported receiving occasional LEP phone calls. Interpreters on staff were called to assist as necessary.
- Staff interpreters are called to assist with meetings and phone calls as needed when family members of consumers are LEP. ACRC counselors are also used as a resource. Documents will be translated, if necessary. To date, this has not been necessary.
- Provision of transit is not considered an "essential" service but is a component of Easter Seals Superior California's, Adult Services programming.
- Easter Seals Superior California does not have an LEP specific budget line.
- Easter Seals Superior California spends approximately \$7500 per year on all outreach efforts.
- Daily revenue rate for program services is 16 years old with no cost-of-living adjustment.



Language Assistance Implementation Plan

Methodologies

Identifying LEP Individuals

As evidenced by the Four Factor Analysis, very few "true" LEP individuals are referred to Easter Seals Superior California, Adult Services. The predominant minority language in the region is Spanish. The consumers that are primarily served by Easter Seals Superior California have disabilities that affect language proficiency rather than a language barrier alone.

While there is a substantial minority population in the region, according to the ACRC and Demographic Data Report, the funds allocated to the Hispanic language population are minimal. In the 26 year history of programs there were no consumers served who were LEP due strictly to a language barrier. The agency does, however, have systems and outreach in place to provide access to minority populations.

Providing Services

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

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

Other documents can be translated to Spanish orally as appropriate. Due to the low literacy rate of consumers in the Easter Seals Superior California Adult Services programming, most documents are translated orally.

Communicating Availability of Language Assistance

Individuals who are referred to Easter Seals Superior California programs for services are assigned a Program Manager who provides guidance and program planning. Program Managers can offer Spanish translation services as needed. Agency reception staff can also offer translation services to guests and consumers' family members as appropriate. Other languages in addition to Spanish are available upon request and the agency maintains an updated list of languages represented. (See Attachment A)

Monitoring

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

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

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

Employee Training

Easter Seals Superior California conducts monthly In-Service training for staff that can include Customer Service, Effective Communication and Language Assistance training. Drivers are provided additional training on a quarterly basis.

As a part of the Accessibility Plan, the agency encourages staff interest and education in learning to more effectively communicate with individuals served in Easter Seals Superior California's programs. Continuing education must have the approval of the employee's supervisor and President/CEO and be within the budgetary constraints of the Organization.

Safe Harbor Provision

The Federal Transit Authority Circular 4702.1B states:

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

These safe harbor provisions apply to the translation of written documents only. They do not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable. A recipient may determine, based on the Four Factor Analysis, that even though a language group meets the threshold

specified by the Safe Harbor Provision, written translation may not be an effective means to provide language assistance measures. For example, a recipient may determine that a large number of persons in that language group have low literacy skills in their native language and therefore require oral interpretation. In such cases, background documentation regarding the determination shall be provided to FTA in the Title VI Program."

As previously stated The Easter Seals Superior California Adult Services program participants have developmental as well as acquired disabilities and range in their functioning levels and abilities. Most require a high level of supervision. As such, the majority of consumers have very limited literacy skills and are unable to read or write. Program documents are generally interpreted orally by Intake coordinators or Program Managers.



Membership of Non-Elected Committees and Councils

Easter Seals Superior California does not have a non-elected transit related advisory council at this time.

Title VI Equity Analysis

Easter Seals Superior California does not have transit related facilities.