

Peninsula Jewish Community Center
Get Up & Go

TITLE VI PROGRAM

Developed: October 22, 2018
Approved by Peninsula Jewish Community Center
Board of Directors: December 6, 2018

800 Foster City Blvd.
Foster City, CA 94404
650-212-7422
www.pjcc.org

INTRODUCTION

This document was prepared by the Peninsula Jewish Community Center (PJCC) to comply with Title VI of the Civil Rights Act of 1964, including new provisions detailed in U.S. Department of Transportation's FTA Circular 4702.1B, "Title VI Requirement and Guidelines for Federal Transit Administration Recipients."

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PENINSULA JEWISH COMMUNITY CENTER
TITLE VI NOTICE TO THE PUBLIC

Notifying the Public of Rights Under Title VI

Peninsula Jewish Community Center

The Peninsula Jewish Community Center (PJCC) operates its programs and services without regard to race, color and national origin or English proficiency 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 PJCC.

For more information on the PJCC's civil rights program, and the procedures to file a complaint, contact (650) 212-7522 or visit our administrative office at 800 Foster City Blvd., Foster City, CA 94404. For more information, write to info@pjcc.org or visit www.pjcc.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 (650) 212-7522.

Si necesita informacion en otra idioma, contacte (650) 212-7522.

如果你需要中文譯本，請電 (650) 212-7522.

PENINSULA JEWISH COMMUNITY CENTER
NOTIFICAR AL PUBLICO DE LOS DERECHOS BAJO EL TITULO VI

Notificar al público de los derechos bajo el título VI
Peninsula Jewish Community Center

The Peninsula Jewish Community Center (PJCC) opera sus programas y servicios sin respecto a raza, color y origen nacional con arreglo al título VI de la 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 el PJCC.

Para obtener más información sobre el programa derechos civiles capaz de industrias y el procedimientos para presentar una queja, llame al (650) 212-7522, o visite nuestra oficina administrativa en 800 Foster City Blvd., Foster City, CA 94404. Para más información información, escribir a info@pjcc.org o visite www.pjcc.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 (650) 212-7522.

LIST OF LOCATIONS WHERE TITLE VI NOTICE IS POSTED

The Peninsula Jewish Community Center's notice to the public is currently posted at the following locations:

| Location Name | Address | City |
|---------------|-----------------------|-----------------------|
| Offices | 800 Foster City Blvd. | Foster City, CA 94404 |

The Title VI notice and program information is also provided on the Peninsula Jewish Community Center's website Senior Transportation homepage at www.pjcc.org/programs/senior-transportation/.

TITLE VI COMPLAINT PROCEDURES

As a recipient of federal dollars, the Peninsula Jewish Community Center (PJCC) 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. The PJCC 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 the PJCC may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form. The PJCC investigates complaints received no more than 180 days after the alleged incident. The PJCC will only process complaints that are complete.

Within 10 business days of receiving the complaint, the PJCC 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. The PJCC 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, the PJCC 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, the PJCC 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.

PENINSULA JEWISH COMMUNITY CENTER TITLE VI 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. | | |

**PENINSULA JEWISH COMMUNITY CENTER
TITLE VI COMPLAINT FORM, PAGE 2**

| | | |
|--|-----|----|
| Section IV: | | |
| 14. Have you previously filed a Title VI complaint with the Peninsula Jewish Community Center? | 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:
Peninsula Jewish Community Center, Title VI Coordinator
800 Foster City Blvd.
Foster City, CA 94404

TITULO VI PROCEDIMIENTO DE QUEJA

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

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

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

Si necesita mas información para resolver el caso, PJCC 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: una carta de cierre o una carta de encontrar (LOF). Una carta de cierre resume las acusaciones y afirma que no hubo una violación del título VI y que el caso será cerrado. Un LOF resume las denuncias y las entrevistas en relación con el incidente y explica si cualquier acción disciplinaria, formación complementaria de lo miembro del personal, u otra acción ocurrirá. Si el demandante desea apelar la decisión, ella tiene 10 días hábiles 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, en la oficina de FTA de los derechos civiles, 1200 New Jersey Avenue SE, Washington, DC 20590.

PENINSULA JEWISH COMMUNITY CENTER
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. | | |

PENINSULA JEWISH COMMUNITY CENTER
FORMA DE QUEJA, PAGINA 2

| | | |
|---|----|---------------------|
| Seccion IV: | | |
| 14. Anteriormente ha presentado un Titulo VI denuncia con la Peninsula Jewish Community Center. | Si | No |
| Seccion V: | | |
| 15. Ha presentado esta queja con cualquier otro local, estado o federal, o con cualquier Federal o Estado? <input type="checkbox"/> Si* <input type="checkbox"/> No si la respuesta es si Marque todo lo que aplica <input type="checkbox"/> Agencia Federal _____ <input type="checkbox"/> Agencia Estatal _____ <input type="checkbox"/> Federal Tribunal _____ <input type="checkbox"/> Agencia Local _____ <input type="checkbox"/> 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 relevante a su queja.

Firma y fecha son especificadas a continuación completar el formulario:

Signature _____ Date _____

Por favor enviar esta forma en persona o enviar por correo este formulario a la siguiente dirección:

Peninsula Jewish Community Center, Title VI Coordinator
 800 Foster City Blvd.
 Foster City, CA 94404

LIST OF TRANSIT-RELATED TITLE VI INVESTIGATIONS, COMPLAINTS AND LAWSUITS

The Peninsula Jewish Community Center (PJCC) has not been involved in any transportation-related Title VI investigations, lawsuits or complaints.

PJCC List of Investigations, Lawsuits and Complaints

| Type of Process | Date | Summary (including basis of complaint) | Status | Action(s) Taken |
|-----------------|------|--|--------|-----------------|
| Investigations | | | | |
| 1. None | | | | |
| 2. | | | | |
| Lawsuits | | | | |
| 1. None | | | | |
| 2. | | | | |
| Complaints | | | | |
| 1. None | | | | |
| 2. | | | | |

Public Participation Plan

About the Peninsula Jewish Community Center

The Peninsula Jewish Community Center (PJCC) is a non-profit 501 c (3) organization that Founded in 1948 in a rented home in Burlingame, the PJCC has grown and evolved in response to community needs. Today, the Center resides on a 12-acre campus in Foster City that opened in 2004 and engages an estimated 45,000 people annually who live and/or work in San Mateo County. The mission of the PJCC is to build a caring and connected community, develop leadership, and strengthen Jewish identity and values in a center with an environment that is welcoming to all people at every stage of life. The PJCC's life-enhancing programs span cultures and generations to promote wellness, prevent isolation, build knowledge and community bonds, and help to improve the world.

The Get Up & Go (GUG) transportation program is a free gap-filling supportive transportation service for non-driving seniors, many of whom are frail or disabled. Its main objective is to provide them access to basic healthcare, including medical appointments and health-related needs like grocery shopping and pharmacy visits. GUG achieves this primary objective by offering:

- Flexible accommodation of most health care appointments on days of GUG operation (Mondays, Tuesdays, Thursdays, and Fridays).
- "Arm-through-arm" personal assistance from the home to the vehicle and back.
- Trained volunteer escorts who provide ambulation assistance, help with reassurance and direction when needed, and accompaniment to appointments and errands when requested.
- The ability of personal caregivers or attendants to accompany a rider.
- Limited wait time for vehicles (small program = on-time arrival).
- A growing volunteer driver program, with use of volunteers' vehicles.
- Use of volunteer drivers' personal vehicles or staff drivers in a mini-van or wheelchair-accessible bus or minivan, depending on need.
- Ability to access harder-to-reach areas with wheelchair-accessible minivan.
- Ongoing outreach to reach those most in need of the service through senior groups and providers.
- Free errand transportation service, helping to meet the needs of low-income seniors.

Because our service addresses assessed San Mateo County needs and extends beyond ADA (Americans with Disabilities Act) requirements – offering a level of supportive transportation often not available through Redi-Wheels or shuttle services – the program has the strong endorsement of SamTrans staff.

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. GUG seeks to improve independence of older adults throughout San Mateo County by providing free, shared-ride transportation services. GUG seeks to support and enhance social relationships by providing opportunities for older adults to participate in engaging activities with others.

Summary of Outreach Efforts

The following is a summary of outreach efforts conducted by the PJCC as they relate to Title VI requirements under the Public Participation Plan. Many of our outreach activities are conducted in partnership or ad hoc 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.

Senior Fairs

GUG staff members regularly participate in senior fairs in geographical areas with populations from the Low English Proficiency (LEP) and low-income communities.

Outreach Documents

GUG has translated one of our outreach publications into Spanish, Tagalog, and Vietnamese, and this will be translated into Chinese. These documents are offered to the public at various venues, including locations within those targeted LEP communities. These materials are available at senior fairs and outreach events.

Targeted Outreach

GUG conducts specific outreach to senior populations who live in low-income housing, such as the Lesley Senior Communities housing.

Community Partnerships

GUG collaborates with the Manager of the San Mateo County Senior Mobility Ambassador outreach program to provide transportation information to professionals and seniors in the community. SamTrans has actively supported the campaign to increase volunteer drivers, and Redi-Wheels, the San Mateo County paratransit operator, refers riders to GUG. Numerous San Mateo County non-profit agencies refer clients to us, including HART (Healthy Aging Response Team, in Daly City), Vista (a program for the blind and visually impaired), senior centers throughout the County, and nurses and social workers at local hospitals, Veterans Affairs clinics, and agencies.

GUG is the referral agency of choice when non-taxi and non-paratransit rides are called for the Mills-Peninsula Medical Center's Peninsula Circle of Care, a program seeking to help seniors avoid readmission after a hospital stay. GUG also cross-refers with Jewish Family and Children's Services and Jewish Vocational Services

Annual Satisfaction Surveys

GUG conducts an Annual Satisfaction Survey with program participants to determine level of satisfaction and gain input regarding unmet needs. To reach a representative cross-section of the GUG clientele, volunteers conduct a telephone survey annually in the spring, aiming to get feedback from at least 20 percent of our riders.

Food and Clothing Drives

Annually, the PJCC conducts food and clothing drives to connect with and benefit low-income populations. These events are publicized through press releases to various media outlets and flyers.

Peninsula Jewish Community Center Website and Lobby

Currently, the PJCC posts notices and announcement on the agency's website; the GUG section can be translated into multiple languages using Google Translate. Additional public input can be obtained by the Title VI Complaint Form, which is available as a download in English and Spanish, and in other languages upon request from our Title VI coordinator. The GUG Outreach Organizer and PJCC Development Department also periodically have table space in the PJCC lobby to share information about the program with our community.

Count Me In

Count Me In is the PJCC's new social justice initiative, which launched in 2018. Through this initiative, the PJCC partners with local organizations (examples include Habitat for Humanity and JCRC) to provide resources and volunteers from our community. This is publicized on the PJCC's website.

Language Assistance Plan

Overview

The first section in this document describes the purpose of the Language Assistance Plan (LAP). The second section in this document provides the four-factor Limited English Proficient (LEP) analysis (as outlined by the Department of Transportation (DOT) used to identify LEP needs and assistance measures. The four-factor LEP analysis includes:

- **Factor 1:** The number or proportion of LEP persons in the service area who may be served or are likely to encounter the Get Up & Go transportation program.
- **Factor 2:** The frequency with which LEP persons come in contact with the Get Up & Go transportation program.
- **Factor 3:** The nature and importance of programs, activities or services provided by the Get Up & Go transportation program to the LEP population.
- **Factor 4:** The resources available to the Peninsula Jewish Community Center (PJCC) 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. The Peninsula Jewish Community Center's (PJCC) 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 Limited English Proficiency (LEP) persons to be served or likely to be encountered by the Peninsula Jewish Community Center’s Get Up & Go program.

Get Up & Go (GUG) services older adults (50 years of age and older) living and traveling within San Mateo County. For planning purposes, we looked at the 2011-2015 American Community Survey 5-year estimates for people who speak English less than “very well” as Limited English Proficient (LEP) persons. Table 1 shows the languages spoken at home, by ability to speak English, for persons five years of age and older in San Mateo County during this period.

Table 1. Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over, 2011-2015, San Mateo County

| | San Mateo County, California | |
|---|------------------------------|----------------|
| Language | Population Estimate | Percentage |
| <i>Speaks English Less Than “Very Well”</i> | | |
| Spanish or Spanish Creole | 63,435 | 9.03% |
| Portuguese or Portuguese Creole | 1,020 | 0.15% |
| Russian | 2,809 | 0.40% |
| Hindi | 1,141 | 0.16% |
| Other Indic languages | 1,062 | 0.15% |
| Chinese | 26,950 | 3.83% |
| Japanese | 2,802 | 0.40% |
| Korean | 1,707 | 0.24% |
| Vietnamese | 1,457 | 0.21% |
| Other Asian languages | 3,770 | 0.54% |
| Tagalog | 15,271 | 2.17% |
| Other Pacific Island languages | 2,264 | 0.32% |
| Arabic | 2,315 | 0.33% |
| Other and unspecified languages | 5,429 | 0.77% |
| Total Speaking English Less than “Very Well” | 131,432 | 18.70% |
| Total Speaking English “Very Well” | 193,906 | 27.59% |
| Total Speaking English Only | 377,434 | 53.71% |
| Total population | 702,772 | 100.00% |
| | | |
| | | |

Source: U.S. Census Bureau, 2011-2015 American Community Survey (ACS) 5-Year Estimates.

The majority of people in San Mateo County, GUG’s service area, are proficient in English (54% speakers of English only, 28% speakers of another language who speak English “very well”). Nineteen percent of the population consists of LEP persons. The two most frequently spoken languages other than English are Spanish (9.03%) and Chinese (3.83%), and these are our

primary target populations for LEP language assistance. Of the 702,772 San Mateo County residents, 63,435 Spanish speakers (9.03%) and 26,950 Chinese speakers (3.83%) speak English less than “very well.” Based on the Safe Harbor provision, we have translated key written materials that are given to clients into Spanish, Chinese, and Tagalog, and vital program information on our website is capable of being translated into multiple languages, covering each LEP group listed in Table 1, since each group constitutes 1,000 or more persons.

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

GUG staff reviewed the frequency with which office staff and drivers have had contact with LEP persons over the past year. The staff person who schedules rides notes that the program gets a call about twice per month from an LEP client. Our prior experience with LEP persons has been primarily with Spanish and Cantonese speakers. Over the past year, our scheduler has noted an increase in clients from India but most speak English well or very well. Out of our over 350 active clients, fewer than fifteen clients have used our LEP resources in the past year. A staff driver who is bilingual in Spanish has been very helpful with about 4-5 clients who are proficient in English but feel more comfortable communicating in Spanish. No clients were underserved or denied service due to language barriers. Annual client surveys provide an opportunity for input from our riders. Surveys have not contained requests for translation services. Translation services are provided by agency staff as needed.

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

GUG provides free shared ride transportation within San Mateo County, enabling low-income, non-driving older adults to get to medical and dental appointments and to run errands such as food shopping. Volunteer escorts are provided as needed and are able to offer a helping hand. We have buses and a minivan with wheelchair-accessibility, thus increasing the independence of individuals in wheelchairs. We are not an emergency or on-call service.

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

The PJCC operating budget does not have a specific line item for providing language access and outreach. GUG reviewed its available resources that could be used for providing LEP assistance. Currently, one of our drivers is bi-lingual, speaking Spanish and English. We have surveyed and identified volunteers and staff members with dual language abilities. The available languages that can currently be accommodated are: Spanish, Cantonese, Japanese, and Hebrew. We are actively recruiting drivers and escorts who speak both English and Spanish or Cantonese to be drivers for LEP clients. We have translated key written materials that are given to clients into Spanish, Tagalog, Vietnamese, and Chinese, and these are also available in multiple languages on our website. Additionally, the PJCC’s Senior Transportation (GUG) webpage offers Google Translate, which enables vital information to be translated into multiple languages. The cost to develop multiple-language documents, beyond our current flyers, would be prohibitive. GUG staff members are currently exploring lower cost options to expand access to target LEP populations, including using volunteers as resources.

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."

SUMMARY

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

- The two most frequently spoken languages other than English are Spanish (9.03%) and Chinese (3.83%), and these are our primary target populations for LEP language assistance.
- The program gets a call about twice per month from an LEP client. Our prior experience with LEP persons has been primarily with Spanish and Cantonese speakers.
- Out of our over 350 active clients, fewer than fifteen clients have used our LEP resources in the past year.
- No clients were underserved or denied service due to language barriers.
- Annual survey responses have not contained requests for translation services.
- Currently, one of our drivers is bi-lingual, speaking Spanish and English. Volunteers and staff members with dual language abilities include: Spanish, Cantonese, Japanese, and Hebrew.
- We have translated key written materials that are given to clients into Spanish, Tagalog and Chinese.
- The PJCC does not have an LEP specific budget line.

Language Assistance Implementation Plan **Methodologies**

Identifying LEP Individuals

As evidenced by the Four Factor Analysis, very few "true" LEP individuals are referred to the PJCC's Get Up & Go (GUG) program. The predominant minority language in the region is Spanish, followed by Chinese. The consumers that are primarily served by the GUG program are older adults who no longer drive for any reason; language barrier is not a primary reason our clients need transportation services. Although the LEP population is small in San Mateo County, the GUG service area, our program does have systems in place to provide access to LEP populations.

Providing Services

There are various ways in which GUG staff responds to LEP persons, whether in person, by telephone, or in writing. If an LEP person contacts us, we will work with that person to make them feel welcome and able to use our service.

In person/With riders:

- One of our drivers is bilingual, speaking Spanish and English, and will address questions from LEP riders directly.
- We are actively recruiting volunteer drivers and escorts who speak both English and Spanish or Cantonese who will be able to service LEP clients in their native language.

By telephone:

- We have surveyed and identified volunteers and staff members with dual language ability. The available languages that can be accommodated are: Spanish, Cantonese, Japanese, Hebrew. These staff members will translate for and accommodate requests from LEP clients.
- We have asked our Volunteer Manager to identify non-English speaking volunteers who will be available and willing to speak with potential LEP clients and/or to translate materials.
- When possible, we also identify family members of LEP clients who are proficient in English who will assist us in communicating with and accommodating the needs of these clients.

In writing:

We have translated key written materials into Spanish, Tagalog, and Chinese. These are made available and provided to LEP clients. Translation of program information into multiple languages is available on our website.

Communicating Availability of Language Assistance

GUG staff regularly participates in senior fairs in geographic areas with populations from the LEP and low-income communities. We have translated one of our outreach publications into Spanish, Tagalog, and Chinese. We will continue to offer these translated documents to the public at various venues, including at locations within those targeted LEP communities.

Monitoring

GUG monitors and reviews the LEP plan at least annually, including:

- Monitoring the frequency and type of requests for service by LEP populations, including requests for oral and written translation
- Reviewing the LEP population in the service area to ensure language assistance and outreach reflect the current LEP population
- Reviewing current sources of assistance to ensure continuing availability (e.g., identifying current staff and volunteers with dual language ability)
- Reviewing any complaints from LEP persons about their needs that were received during the past year

The GUG LEP Plan will be updated as needed based on this review, and/or when it is clear that higher concentrations of LEP individuals are present in our service area requiring plan modification. In addition will review and update the plan per the most recent FTA Title VI circular.

Staff and Volunteer Training

To ensure effective implementation of this plan, GUG conducts training at orientations, as part of the hiring and onboarding process, for new and existing GUG staff and volunteers to review:

- Information on Title VI Procedures and LEP responsibilities
- Description of GUG's Language Assistance Plan and procedures for offering LEP services to the public
- Demographic data about the local LEP population
- Documentation of language assistance

Membership of Non-Elected Committees and Councils

The Peninsula Jewish Community Center does not have a non-elected transit related advisory council at this time.

Title VI Equity Analysis

The Peninsula Jewish Community Center does not have transit related facilities.

Board of Directors Approval of the Peninsula Jewish Community Center's Title VI Program

A RESOLUTION OF THE PENINSULA JEWISH COMMUNITY CENTER'S BOARD OF DIRECTORS AUTHORIZING THE TITLE VI COMPLIANCE PLAN FOR THE AGENCY.

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

WHEREAS, the Board of Directors wishes to authorize approval of the compliance plan developed by staff to comply with necessary provisions of the Civil Rights Act,

NOW, THEREFORE BE IT RESOLVED, by the Board of Directors of the Peninsula Jewish Community Center as follows:

1. The Chief Executive Officer is authorized to implement the components of the plan in order to meet Federal requirements.
2. The Chief Executive Officer is authorized to implement policies that may be necessary to comply with subsequent revisions or interpretations to the Civil Rights Act.

PASSED AND ADOPTED by the Board of Directors of the Peninsula Jewish Community Center, State of California, on this 6th day of December, 2018.

Neal A. Rubin, President of the Board