Willits Senior Center Title VI Program & Limited English Proficiency Plan

Transit System

2023





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Willits Senior Center Title VI Program Transit System

Introducton:

Our purpose at the Willits Senior Center is to enhance, assist and improve the lives of seniors and disabled community members and their families. To provide for all who live in the Willits area, age 55 and older, a place for social gatherings, activities, education, training, and service opportunities. Foremost is our mission to provide care for seniors through programs offering nutrition, transportation, welfare calls, and visits to those who live alone. We connect seniors to other community resources if we cannot provide them with the help they are looking for.

The Willits Senior Center serves an affordable meal five days a week. The low cost, full course meals include soup in the winter and a salad bar in the summer. We are able to supply some of our fruit and vegetable needs from our own Center's Garden. This service is available to our senior community as well as the community at large. We serve between 50 and 100 meals a day Monday through Friday. We offer On-site meals served in our dining room from 11:45 am to 1 pm. We also provide meals via our Meals on Wheels Program to at risk senior and disabled community members who are homebound and physically unable to cook or shop for themselves.

Both of the Willits Senior Center vehicles, a 2015 Dodge Braun and a 2014 Ford E350 Bus are capable of transporting wheelchair passengers.

Our specialized "door through door" transportation service is essential for seniors and the disabled adults over the age of 18 facing mobility issues. Our drivers are able to assist these clients by going into their home and aid them across the threshold, for those in wheel chairs a threshold is a barrier, and return them safely back into their residences. Our drivers carry passengers from our vehicles inside their residences and place them on the counter tops. They lend a steady arm or helping hand for passengers with balance issues. We are the only ones in the greater Willits area to provide this specialized transportation service. Our transportation service connects seniors to essential services such as getting to the bank, doctor, hospital, dentist, physical therapy, surgeries, and grocery shopping This service helps them to continue living independently in their own homes.

Mendocino County Health and Human Services is our primary source of income for our Outreach department. We are seeing more mental health clients who need assistance because all their services have been cut. Due to age, emotional and physical disabilities our Outreach services are in high demand. Our Outreach ladies visit and follow-up with identified lonely, vulnerable, isolated and abused elders. They inform, monitor, and assist seniors on ways to safely reside independently in their homes through telephone checks and in-home visits. They assist with housing applications, money management services and help locate private pay care providers. They run errands, transport, accompany to medical appointments and assist with reading, comprehension and completion of forms. They provide rep-payee services to (18) elders and disabled clients who were referred from Mendocino County Adult Protective Services.



The Outreach program is also in charge of the Volunteers who transport clients to out-of-town Doctor Appointments. We also partner together with Community Care to provide transportation to their clients as well as our own.

Our Thrift Store has grown over the years from a small single room shop to our purchasing a 3,000 square foot metal building where it is currently housed. With our community's generous donations of gently used furniture, clothing and other miscellaneous items and the help of many volunteers, our Thrift Store provides 30% of the revenue needed to keep our doors open. This income enables us to continue to provide transportation, outreach and nutrition programs as well as social and health activities to our senior and disabled population.

Plan Statement:

The Willits Senior Center operates their transit service in the Greater Willits area, including Brooktrails. As a condition of receiving Federal Transit Administration (FTA) financial assistance from the U.S. Department of Transportation (DOT) to operate this service, the Willits 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 Willits Senior Center in its administration and management of Title VI-related activities, and details how the Willits 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 Willits 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 Willits Senior Center's employees, affiliates, and contractors.

Governing Board:

The governing board for Willits Senior Center's transit system is made up of nine (9) 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 Willits Senior Center's Title VI Program fulfills that requirement.

1. <u>REQUIREMENT TO PROVIDE TITLE VI AS</u>SURANCES.

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 Willits Senior Center submits its Certifications and Assurances to Caltrans when they receive a grant.

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.

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

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 Willits 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 Willits Senior Center and on the bus. The notice is also posted on the following website: http://www.willitsseniorcenter.com/transit.

4. REQUIREMENT TO HAVE TITILE 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 Willits 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.willitsseniorcenter.com/transit. 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. <u>REQUIREMENT TO RECORD AND REPORT TRANSIT-RELATED TITLE VI INVESTIGATIONS, COMPLAINTS, AND LAWSUITS</u>

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 Willits Senior Center will maintain a list of all investigations, lawsuits and complaints naming Willits Senior Center according to the guidelines of Circular FTA C 4702.1B, Appendix E. A copy of this list is provided in Appendix F of this Title VI Program. In addition, the Center will maintain permanent records of all related documents. The Willits 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 Willits Senior Center's public participation policy is shown in Appendix G of this Title VI Program. The Willits 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 Willits 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 Willits Senior Center Limited English Proficiency Plan attached to this Title VI Program. The Willits 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 Willits 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. <u>Facilities included in this provision include, but are not limited to, storage facilities, maintenance facilities, operations centers, etc.</u>

Caltrans only.

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



Willits Senior Center Limited English Proficiency Plan

Introduction

The purpose of this Language Assistance Plan is to clarify the responsibilities of the Willits 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 Willits Senior Center), and sub-recipients.

Plan Summary

The Willits 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 Willits 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 Willits 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 Willits Senior Center.
- 2) The frequency with which LEP persons come into contact with Willits Senior Center programs, activities, or services;
- 3) The nature and importance of the programs, activities or services provided by the Willits Senior Center to the population; and
- 4) The resources available to the Willits 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 Willits 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 Willits Senior Center's transit service, the total population served by the Center's transit service must first be defined. The Willits 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 Willits Area and the community of Brooktrails. Based on the geographic locations available within the American Community Survey, the Center had the option of analyzing the data for the Willits CCD¹ or the combined data for the City of Willits and the Brooktrails CDP². Although the Willits CCD included people that were outside of the area served by the Willits Senior Center, the Center felt that the combination of the City of Willits and Brooktrails CDP left out too many people who are or may be served by them.

To calculate the total potential population, the following tables from the 2016-2020 American Community Survey 5-Year Estimates were used:

¹ Census County Division (CCD) – A subdivision of a county or equivalent entity that is a relatively permanent statistical area established cooperatively by the Census Bureau and state, tribal, and local government authorities. Used for presenting census and survey data in those states that do not have well-defined and stable minor civil divisions.

² 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.



- 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

Using data from the three tables listed above, the total potential population served by the Willits Senior Center's transit system can by 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 Willits CCD. S0101 shows a total population of 13,475 whereas table DP02 uses a total "Civilian Noninstitutionalized Population³" of 13,414. Table B16004 only shows a population of 12,389 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 Willits Senior Center's transit system based on the three categories and geographic areas discussed above.

Group	Willits CCD
Age 65+	3,307
Under 65 w/ a Disability	1,466
Between 55 and 64 w/o a disability	1,203
Total Potential Population:	5,976

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

³ 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.

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data found in table B16004 is separated into three age groups: 5 to 17 years, 18 to 64 years, and age 65 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 Willits Senior Center examined data for those who speak English "well", "not well", or "not at all".

The table in Appendix M shows the language breakdown for the geographic areas served by the Willits 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 16 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 Willits 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					
Willits CCD	10,163	1,466	14.4%		

To calculate the number of LEP people with a disability under the age of 65, the Willits 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 M). The table below reflects these calculations:

Population Under Age 65 With a Disability					
Geographic Region Total LEP Pop <65 W/Disability #LEP <65 W/Disability					
Willits CCD	342	14.4%	49		

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.



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				
Willits CCD	293	11.2%	33	

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

Total LEP Population Potentially Served by the Willits Senior Center Transit Service			
Group	Willits CCD		
Age 65+	122		
Under 65 w/ a Disability	25		
Between 55 and 64 w/o a disability	33		
Total LEP Population:	180		
% LEP of the Total Potential Population:	3.0%		

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 Willits Senior Center further examined specific languages using the 2016-2020 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 English fall under the 'Safe Harbor Provision'. Please refer to Appendix N: 2016-20 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 English 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 Willits Senior Center programs, activities, or services.



According to the 2016-2020 American Community Survey 5-Year Estimates, the largest geographic concentration of LEP individuals in the Willits Senior Center's service area is Spanish-speaking. This population is approximately 10.6% of the population over 5 years of age, or an estimated population of 1,311. Those that speak English less than "very well" are 1.3% of the population or an estimated 163 people. The Willits 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 Willits Senior Center staff and drivers have infrequent interactions with Spanish speaking passengers on their transit service.

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

The Willits Senior Center's transit service is an essential service for its members. The Center's 'transit-dependent' population includes elderly persons and people with disabilities. The transit service provides these people with access to shopping, healthcare, and other facilities in and around the Greater Willits Area.

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

The Willits 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 Willits Senior Center has an employee and several volunteers who speak Spanish that are available to translate in-person and over the phone. If these people are unavailable, the Center has a working agreement with Nuestra Alianza 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 Willits 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 Willits 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 Willits 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 Willits Senior Center staff will be provided with "I Speak" cards to assist in identifying the language interpretation needed if the occasion arises.



- All Willits Senior Center staff will be informally surveyed periodically on their experience concerning any contacts with LEP persons during the previous year.
- When the Willits 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 K) 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 Willits Senior Center of LEP individuals, that is, persons who speak English "well", "not well", or "not at all", it will strive to offer the following measures:

- 1. The Willits 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 Willits Senior Center has a Spanish-speaking employee and volunteers that are available to translate. If these people are unavailable, the Center has an agreement with Nuestra Alianza for interpretive services.
 - b. Language interpretation may be available for other languages in cooperation with Mendocino County Social Services.
- 3. The Willits 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

Willits Senior Center staff will 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 L for Training Materials.



Monitoring and Updating

The Willits Senior Center's Language Assistance Plan is designed to be easily updated. At a minimum, the Willits 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 Willits 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 Willits Senior Center Language Assistance Plan

The Willits Senior Center will include the Language Assistance Plan along with the Title VI Program on the Willits Senior Center transit website (http://www.willitsseniorcenter.com/transit). 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 Willits Senior Center Title VI Coordinator:

Willits Senior Center Title VI Coordinator 1501 Baechtel Road Willits, CA 95490 Phone: (707) 459-6826



Appendix A: Title VI Notice to Beneficiaries

The Willits 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 Willits Senior Center.

For more information on the Willits Senior Center's civil rights program and the procedures to file a complaint, contact (707) 459-6826; go online at http://www.willitsseniorcenter.com/transit; or visit our administrative office at 1501 Baechtel Road, Willits, CA 95490.

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)462-4343.

Si se necesita información en otro idioma, llame al (707) 462-4343.



Appendix A: Título VI Aviso a los beneficiarios

El Senior Center Willits 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 Willits.

Para obtener más información sobre el programa de derechos civiles del Senior Center Willits y los procedimientos para presentar una queja, contacte a (707) 459-6826; ir en línea en http://www.willitsseniorcenter.com/transit, o visite nuestra oficina administrativa en 1501 Baechtel Road, Willits, CA 95490.

Un demandante puede presentar una queja directamente con la Administración Federal de Tránsito mediante la presentación de una queja ante la Oficina de Tránsito Administration 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) 462-4343.



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 Willits Senior Center transit system may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form. The Willits Senior Center investigates complaints received no more than 180 days after the alleged incident. The Willits 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:

Willits Senior Center Attn: Title VI Coordinator 1501 Baechtel Road Willits, CA 95490

Once the complaint is received, the Willits 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 Willits Senior Center.

The Willits Senior Center has 30 days to investigate the complaint. If more information is needed to resolve the case, the Willits 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 Willits 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 Willits 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 Willits investiga las quejas recibidas no más tardar 180 días después del supuesto incidente. El Senior Center Willits 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:

Willits Senior Center Attn: Title VI Coordinator 1501 Baechtel Road Willits, CA 95490

Una vez recibida la denuncia, el Senior Center Willits 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 Willits.

El Senior Center Willits tiene 30 días para investigar la denuncia. Si se necesita más información para resolver el caso, el Senior Center Willits 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 Willits 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, 5th 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 Willits Senior Center in processing your complaint.

SECTION 1 (Please print clearly):				
Name:				
Address:				
City, State, Zip Code:				
Telephone Number:	(Home)	(Work) Acc	essible
format requirements?	(Large print)	(Audiotape)	(TDD)	(Other)
SECTION 2				
Are you filing this complaint on your If you answered yes to this question If not, please supply the name and rename: Please explain why you have filed for Please confirm that you have obtain	, go to Section 3. elationship of the μ Relation r a third party:	person for whom y		
the third party(Yes)(No	•	00 1	, , ,	0
SECTION 3				
I believe the discrimination I experieRaceColor	National Origin			
Date and Place of Occurrence:				
Name (s) and Title(s) of the person (s) who I believe dis	criminated agains	st me:	
The action or decision which caused (Please include a description of what ha		,	-	
				



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 St Court?(Yes)(No)
If yes, check all that apply: Federal AgencyState AgencyState CourtLocal Agency
Please provide information about a contact person at the agency/court where the complaint was file Name:
Agency:
Address: Telephone Number:
You may attach any written materials or other information that you think is relevant to your complain 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: Willits Senior Center Title VI Coordinator 1501 Baechtel Road Willits, CA 95490



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 Willits 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:
Por favor, explique por qué usted ha presentado para un tercero:
SECCIÓN 3
Creo que la discriminación que experimenté fue basada en (marque todo lo que corresponda):RazaColorOrigen 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):



1501 Baechtel Road Willits, CA 95490

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
SECCION 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 FederalTribual FederalAgencia EstatalTribunal EstatalAgencia 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 Fecha
Por favor, envíe este formulario en persona en la dirección indicada más abajo o envíe por correo este formulario a: Willits Senior Center Title VI Coordinator

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Appendix D

Willits Senior Center Passenger Conduct Guidelines

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

- The Willits Senior Center complies with all pertinent State and Federal regulations governing general public transportation.



- The general public riders and WSC employees experience safe, comfortable and reliable service.

It is the WSC'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

Willits Senior Center Pautas de Conducta del Pasajero

El Senior Center Willits 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 WSC 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 WSC 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 WSC.
- 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 Willits transporta pasajeros de acuerdo con estas pautas de conducta del pasajero asegurarse de que:

- El Senior Center Willits 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 WSC experimentan un servicio seguro, cómodo y fiable.

Es la intención de la WSC 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.





HARRAH SENIOR CENTER

COMMUNITY MATTERS

Our mission is to enhance, assist and improve the lives of those senior and disabled community members by offering them the following services.

To assist seniors and disabled 55 years and older in the greater Willits area; to promote the general welfare of such citizens; to provide a meeting place for seniors for social gatherings, educational purposes, and service activities; and to provide services for them, including but not limited to nutritional, counseling, social, health, transportation, and in-home care programs.



Transportation - 707-459-5556 Office - 707-459-6826

willitsseniorcenter.com

Fax - 707-459-1772

SENIOR CENTER TRANSPORTATION



WEEKDAY TRANSPORTATION AVAILABLE

8am - 4pm AGE ELIGIBILITY: 55Years + or Any Disabled Person

> HARRAH SENIOR CENTER 1501 BAECHTEL ROAD

WILLITS CA 95490

707-459-5556



Appendix E: Transit Brochure

TRANSPORTATION

Our transportation service runs Monday – Friday, 8:00am – 4:00pm. Our vehicles service Brooktrails & Pine Mountain, North to Reynolds Hwy, South to Walker Road, East to Canyon Road/Hearst, and West (Hwy 20) to RR tracks.

We dispatch in house and have a seven passenger wheelchair bus and a four passenger minivan to transport clients. These calls are on demand and by appointment.

We take our clients to various appointments: the hospital, shopping, banking and to the Center for bingo, paint class, bridge and to fellowship and socialize together over lunch.

We also offer rides to our senior and disabled clients for out of town Doctor appointments to Ukiah, Santa Rosa, & Lake County. The clients are charged for this service so the Center can reimburse the volunteer drivers for their mileage.

AMERICANS WITH DISABILITIES ACT

We have specialized transportation services available and compliant with the Americans with Disabilities Act (ADA), to compliment MTA'S fixed bus route service in Willits during Contract Hours and within the Service Area.

Applications for eligibility may be obtained from our Transportation department. Any questions regarding qualifications may be answered by calling Pam @ 462-1422 ext #443.

ADA eligible riders shall call Harrah Senior Center at 707-459-5556 in advance to make reservations.

ATTENTION

Doctor appointments and other important scheduling should be made in advance to ensure getting there on time.

TRANSPORTATION HOURS MONDAY THRU FRIDAY 8am - 4pm

ONE-WAY FARES

CITY OF WILLITS - \$2.00 BUS PASS - 20 Rides for \$30.00 WILLTS VALLEY - \$2.50 BUS PASS - 20 Rides for \$40.00

BROOKTRAILS &

PINE MOUNTAIN - \$4.00
BUS PASS - 20 Rides for \$70.00
(Service not available in all areas.)

Persons actively assisting passengers ride free of charge.

TERRY BAKER Dispatch and General Information

707-459-5556

MARCUS KELLY
Transportation Supervisor
&
Lead Driver

STACY SHAUL & SID CUTHBERT Drivers



Appendix E: Transit Brochure

HARRAH SENIOR CENTER

ASUNTOS COMUNITARIOS

Nuestra misión es mejorar, ayudar y mejorar la vida de los miembros mayores y discapacitados de la comunidad, ofreciéndoles los siguientes servicios. Para ayudar a las personas mayores y con discapacidad mayores de 55 años en el área de Willits; promover el bienestar general de dichos cudadanos; para proporcionar un lugar de encuentro para las personas mayores para reuniones sociales, con fines educativos, y actividades de servicios; y proporcionar servicios para ellos, incluyendo, pero no limitado a, consejería, transporte y programas sociales nutricionales de salud en el hogar de cuidado.



HARRAH SENIOR CENTER 1501 BAECHTEL ROAD WILLITS CA 95490

Transportation - 707-439-5556
Office - 707-459-6826
Fax - 707-459-1772
willitsseniorcenter.com

SENIOR CENTER TRANSPORTATION



SEMANA DE TRANSPORTE DISPONIBLE

8am - 4pm

ELEGIBILIDAD: 55+ años o personas con discapacidad

707-459-5556



Appendix E: Transit Brochure

TRANSPORTE

Nuestro servicio de transporte funciona de lunes - viernes de 8:00 am - 4:00 pm. Los vehículos de servicio Brooktrails & Pine Mountain, North Reynolds Hwy, South Walker Road, East Canyon Road / Hearst, y Oeste (Hwy 20) al RR pistas. Nos despachar en casa y tienen un autobús de pasajeros y siete sillas de ruedas de cuatro minivan del pasajero para transportar clientes. Estas llamadas son a la carta y con cita previa.

Tomamos a nuestros clientes a varias citas: el hospital, ir de compras, la banca y el Centro para el bingo, clases de pintura, puente, a la comunión y socializamos juntos durante el almuerzo.

También ofrecemos paseos a nuestros clientes mayores y discapacitados de fuera de la ciudad Médico nombramientos en Ukiah, Santa Rosa, y el condado de Lake. Los clientes pagan por este servicio por lo que el Centro puede reembolsar a los conductores voluntarios para su kilometraje.

Por favor llame para más información sobre los costos de transporte para salir de citas con el médico del pueblo.

AMERICANS WITH DISABILITIES ACT

Nos hemos especializado servicios de transporte disponibles y que cumplan con la Ley de Estadounidenses con Discapacidades (ADA) con, para complementar el servicio de ruta fija de autobús de la MTA en Willits durante horas de contrato y dentro del área de servicio. Las solicitudes de elegibilidad se pueden obtener de nuestro departamento de Transporte. Cualquier pregunta relacionada con las calificaciones pueden ser contestadas llamando Pam @ 462-1422 ext # 443.

ADA pasajeros elegibles llamarán Harrah Senior Center al 707-459-5556 con anticipación para hacer reservaciones.

ATENCIÓN

Las citas médicas y demás programación importantes deben hacerse con anticipación para asegurarse de llegar a tiempo.

HORAS DE TRANSPORTE LUNAS A VIERNES 8am - 4pm

TARIFAS DE UNA MANERA

CIUDAD DE WILLITS - \$2.00 BUS PASS - 20 Viajes for \$30.00

VALLE WILLITS - \$2.50

BUS PASS - 20 Viajes for \$40.00

BROOKTRAILS &

PINE MOUTAIN - \$4.00 BUS PASS - 20 Viajes for \$70.00 (Servicio no disponible en todas Personas asistir activamente a los pasajeros viajen de forma gratuita.

as áreas)

TERRY BAKER

Despacho y Información General

707-459-5556

MARCUS KELLY Supervisor de Transporte STACY SHAUL & SID CUTHBERT
Conductores

Chófer



Appendix F: 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 Willits 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			





Appendix G: Public Participation Plan

Summary of Outreach Efforts Made

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

- Their Facebook page
- Their website (http://www.willitsseniorcenter.com/)
- 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
 - o Hospitals
 - Social Services

Outreach Plan to Engage Minority and LEP Populations

The Willits 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 Willits Senior Center will ensure that their Spanish brochures are placed in the various placed listed above. They will also place their brochures in places often frequented by the Hispanic community such as:

- Jara's Mexican Market
- Saint Anthony of Padua Church
- Mexican Restaurants



Appendix H: Letter Acknowledging Receipt of Title VI Complaint

Today's Date

Ms. Jane Doe 1234 Main St. Willits, CA 95490

Dear Ms. Doe:

This letter is to acknowledge receipt of your complaint against the Willits 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) 459-6826, or write to:

Willits Senior Center Attn: Title VI Coordinator 1501 Baechtel Road Willits, CA 95490

Sincerely,

Willits Senior Center Title VI Coordinator



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

Willits Senior Center Title VI Coordinator

Sincerely,



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

Today's Date
Ms. Jane Doe 1234 Main St. Willits, CA 95490
Dear Ms. Doe: The matter referenced in your complaint of (date) against the Willits Senior Center
alleginghas 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 Willits Senior Center has analyzed the materials and facts pertaining to your case for evidence of the Willits 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 Willits 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,
Willits Senior Center Title VI Coordinator



Appendix K

Caltrans Public Participation Survey

Participating Agency: Willits 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 wiht an "X" that best desribes you and return the completed survey to the event coordinator. Submittal of this information is *voluntary*.

Sex
Male Female
Ethinicity
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 K

Caltrans Encuesta de Participación Pública

Agencia participante: Willits 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 desribes 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
Discapacidad
Sí No
· · · · · · · · · · · · · · · · · · ·
☐ Sí ☐ No
Sí No Edad
Sí No Edad Menos de 40 Más de 40
Sí No Edad Menos de 40 Más de 40 Ingresos \$22.050 o Menos



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.
- 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 Pacifico**: Una persona que tiene orígenes en cualquiera de los pueblos originales de Hawai, 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 L

Training Materials





POLICY AND PROCEDURES FOR INTERACTIONS WITH LEP PERSONS

POLICY:

The Willits 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 Willits 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 Willits 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 INTEPRETER

Willits 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 employee or volunteers for any communication needs. If none of these people are available, call Nuestra Alianza 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 Willits 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?	



	Census Census LANGUAGE IDENTIFICATION FLASHCARD	
	شيع علامة في هذا العربع إذا كنت تقرأ أو تقحدث العربية.	1. Arabic
	ինչը իառաղ, քուղ, քունանուղ, ըն չումբնուր; թամեուղ, թյոն ,ոնաղ, քառանըն անո ճառաքատուղ,՝	2. Armenian
	यनि चार्थित वर्णा शरफन ना वरणम का करण और वरणम माथ निम।	3. Bengali
	ល្វាមបញ្ជាក់ក្នុងប្រលើនេះ ឃើរក្រភេន ឬនិយាយភាសា ឡែ ។	4. Cambodiar
	Motka i kabbon ya yangin ûntûngmu' manaital pat ûntûngmu' kumentos Chamorro.	5. Chamorro
	如果你能读中文或讲中文,请选择此框。	6. Simplified Chinese
	如果你能镀中文或解中文。簡獨擇此權。	7. Traditional Chinese
	Označite ovaj kvadratić ako čitate ili govorite hrvatski jezik.	8.Croatian
	Zaškrinčie tuto kolonku, pokud čtete a hovočite česky.	9. Czech
	Kruis dit vakje am als u Nederlands kunt lezen of spæken.	10. Dutch
	Murk this box if you read or speak English.	11. English
	انگر عوالدن ر توشين فارسي بلد هستيت اين مريم را ملامت يزليد.	12. Farsl
19,830B	U.S. DEPARTMENT OF COMMERCE Scottypics and Stubilities Administration 10. Commerce	



DB-3309	U.S. DEPARTMENT OF COMMERCE Economics and Bushfac Alministration U.S. CENSUS BURNEAU	
	Prosimy o zaznaczenie tego kwadratu, jeżeli posługuje się Pan/Pani językiem polskim.	25. Polish
	ໃຫ້ພາຍໃຊ່ຊ່ວງນີ້ ຖ້າສ່ານໜ້ານຫຼືປາຫພາສາລາວ.	24. Laotian
	한국어를 읽거나 말할 수 있으면 이 칸에 표시하십시오.	23. Korean
	日本語を読んだり、話せる場合はここに印を付けてください。	22. Japanese
	Marchi questa casella se legge o parla italiano.	21. Italian
	Markaam daytoy nga kahon no makabasa wenno makasaoka iti Ilocano.	20. Ilocano
	Jelölje meg ezt a kockát, ha megérti vagy beszéli a magyar nyelvet.	19. Hungarian
	Kos lub voj no yog koj paub twm thiab hais lus Hmoob.	18. Hmong
	अगर आम हिन्दी बोलते या पढ़ सकते हों तो इस बक्स मर विक्क लगाएँ।	17. Hindi
	Make kazye sa a si ou li oswa ou pale kreyòl ayisyen.	16. Haitian Creole
	Σημειώστε αυτό το πλαίσιο αν διαβάζετε ή μιλάτε Ελληνικά.	15. Greek
	Kreuzen Sie dieses Kästehen an, wenn Sie Deutsch lesen oder sprechen.	14. German
	Cocher ici si vous lisez ou parlez le français.	13. French



		Ī
	Assimile este quadrado se você lê ou fala português.	26. Portuguese
	Însemneți sceană cărujă dacă chiți neu vochiți românește.	27. Romanian
	Пометьте этот квадрятик, если вы читаете или говорите по-русски.	28. Russian
	Обележате свиј авържић уколико читате или гелорите српски јеми.	29. Serbian
	Označte tento št vorček, ak viete čítať alebo bovoriť po slovensky.	30. Slovak
	Marque esta casilla si fee o habla español.	31. Spanish
	Markahan itong kuwadrado kung kayo ay marunong magbasa o magsalita ng Tagalog.	32. Tagalog
	ให้กาเครื่องหมาสดังในช่องอักท่านสามหรือสูงภาษาใหม่,	33. Thai
	Maaka 'i he puha ni kapau 'oku ke lau pe lea fakatonga.	34: Tongan
	Відмітьте що клітивку, якщю ви читаєте або говорите українською мовою,	35. Ukranian
	اگرآپ اردو پزیمنظ یا اید لنظ بین آواس خانے بین نشان لگائیں۔	36. Urdu
	Xin đánh dấu vào ô này nếu quý vị biểi đọc và nói được Việt Ngữ.	37. Vietnamese
	באצייכנט דעם קעסטל ווויב אור לייענט אדער רעדט אידיש.	38.Yiddish
DB-3309	U.S. DEPARTMENT OF COMMERCE Expension and Madellon Administration U.S. COMMISS REPEAL)





Appendix M: 2016-2020 American Community Survey 5-Year Estimates

Language Spoken at Home	Willits CCD
otal:	12,389
<u>5 to 17 Years</u>	2,015
English only:	1,637
Spanish	335
Speak English less than " very well"	0
Other Indo-European languages:	24
Speak English less than " very well"	0
Asian and Pacific Island languages:	19
Speak English less than " very well"	0
Other languages:	1
Speak English less than " very well"	0
18 to 64 Years	7,067
English only:	6,025
Spanish	859
Speak English less than " very well"	53
Other Indo-European languages:	36
Speak English less than " very well"	0
Asian and Pacific Island languages:	143
Speak English less than " very well"	115
Other languages:	4
Speak English less than " very well"	3
65 Years and over	3,307
English only:	3,119
Spanish	118
Speak English less than " very well"	110
Other Indo-European languages:	47
Speak English less than " very well"	9
Asian and Pacific Island languages:	3
Speak English less than " very well"	3
Other languages:	20
Speak English less than " very well"	0

Sources:

"2016-2020 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 Willits CCD





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

	Willits CCD
Total:	11,736
Speak only English	10,433
Spanish or Spanish Creole:	1,146
Speak English "very well"	765
Speak English less than "very well"	381
French (incl. Patois, Cajun):	29
Speak English "very well"	0
Speak English less than "very well"	29
French Creole:	0
Speak English "very well"	0
Speak English less than "very well"	0
Italian:	14
Speak English "very well"	14
Speak English less than "very well"	0
Portuguese or Portuguese Creole:	0
Speak English "very well"	0
Speak English less than "very well"	0
German:	15
Speak English "very well"	15
Speak English less than "very well"	0
Yiddish:	11
Speak English "very well"	11
Speak English less than "very well"	0
Other West Germanic languages:	31
Speak English "very well"	31
Speak English less than "very well"	0
Scandinavian languages:	0
Speak English "very well"	0
Speak English less than "very well"	0
Greek:	0
Speak English "very well"	0
Speak English less than "very well"	0
Russian:	34
Speak English "very well"	0
Speak English less than "very well"	34
Polish:	0
Speak English "very well"	0
Speak English less than "very well"	0
Serbo-Croatian:	0
Speak English "very well"	0



Speak English less than "very well"	0
Other Slavic languages:	0
Speak English "very well"	0
Speak English less than "very well"	0
Armenian:	0
Speak English "very well"	0
	-
Speak English less than "very well" Persian:	0
	0
Speak English less than "very well"	0
Speak English less than "very well"	0
Gujarati:	0
Speak English "very well"	0
Speak English less than "very well"	0
Hindi:	0
Speak English "very well"	0
Speak English less than "very well"	0
Urdu:	0
Speak English "very well"	0
Speak English less than "very well"	0
Other Indic languages:	0
Speak English "very well"	0
Speak English less than "very well"	0
Other Indo-European languages:	0
Speak English "very well"	0
Speak English less than "very well"	0
Chinese:	0
Speak English "very well"	0
Speak English less than "very well"	0
Japanese:	5
Speak English "very well"	5
Speak English less than "very well"	0
Korean:	0
Speak English "very well"	0
Speak English less than "very well"	0
Mon-Khmer, Cambodian:	0
Speak English "very well"	0
Speak English less than "very well"	00
Hmong:	0
Speak English "very well"	0
Speak English less than "very well"	0
Thai:	0
Speak English "very well"	0
Speak English less than "very well"	0
Laotian:	0
Speak English "very well"	0
Speak English less than "very well"	0



Vietnamese:	0
Speak English "very well"	0
Speak English less than "very well"	0
Other Asian languages:	0
Speak English "very well"	0
Speak English less than "very well"	0
Tagalog:	17
Speak English "very well"	17
Speak English less than "very well"	0
Other Pacific Island languages:	0
Speak English "very well"	0
Speak English less than "very well"	0
Navajo:	0
Speak English "very well"	0
Speak English less than "very well"	0
Other Native North American languages:	1
Speak English "very well"	1
Speak English less than "very well"	0
Hungarian:	0
Speak English "very well"	0
Speak English less than "very well"	0
Arabic:	0
Speak English "very well"	0
Speak English less than "very well"	0
Hebrew:	0
Speak English "very well"	0
Speak English less than "very well"	0
African languages:	0
Speak English "very well"	0
Speak English less than "very well"	0
Other and unspecified languages:	0
Speak English "very well"	0
Speak English less than "very well"	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 Willits CCD

WILLITS SENIORS INC. TITLE VI RESOLUTION

A RESOLUTION OF THE WILLITS SENIOR CENTER APPROVING A TITLE VI POLICY PURSUANT TO THE CML RIGHTS ACT OF 1964 AND THE CIVIL RIGHTS RESTORATION ACT OF 1987; APPROVING THE ASSOCIATED LIMITED ENGLISH PROFICIENCY PLAN; AUTHORIZING THE EXECUTIVE DIRECTOR TO EXECUTE SAID POLICY ON BEHALF OF THE WILLITS SENIOR CENTER AND APPOINT A TITLE VI COORDINATOR; AND PROVIDING AN EFFECTIVE DATE.

WHEREAS, as the recipient of Federal Transit Administration (FTA) funding, the Willits Senior Center must establish and maintain a Title VI program, including a Limited English Proficiency Plan, pursuant to Title VI of the Civil Rights Act of 1964 and the Civil Rights Restoration Act of 1987; and

WHEREAS, the Willits Senior Center desires to establish a plan to ensure patrons of the Willits Senior Center are protected from civil rights violations; and

NOW THEREFORE, be it resolved by the Board of Directors of the Willits Senior Center as follows:

Section 1. That the Title VI Policy, a copy of which is attached hereto and incorporated herein by reference be, and the same hereby is, approved as to both form and substance.

Section 2. That the associated Limited English Proficiency Plan, a copy of which is attached hereto and incorporated herein by reference be, and the same hereby is, approved as to both form and substance.

Section 3. That the Executive Director is here authorized to execute the Title VI Plan and associated Limited English Proficiency Plan and appoint a Title VI Coordinator.

Section 4. That this Resolution shall be in full force and effective immediately upon its adoption and approval.

PASSED by the Board of Directors and approved by the President on the 26th day of June 2023

ATTEST:

Sue Sawvers: President

ATTEST:

Dorothy Roediger Secretary