

INYO-MONO ASSOCIATION FOR THE HANDICAPPED

TITLE VI PROGRAM

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**Approved by Inyo-Mono Association
for the Handicapped**

Board of Directors: March 20, 2014

Reviewed and Approved: April 10, 2017

Inyo-Mono Association for the Handicapped

371 South Warren Street

Bishop, CA 93514

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INTRODUCTORY:

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

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Inyo-Mono Association for the Handicapped's Title VI Notice to the Public

Notifying the Public of Rights Under Title VI Inyo-Mono Association for the Handicapped

- Inyo-Mono Association for the Handicapped 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 Inyo-Mono Association for the Handicapped.
- For more information on Inyo-Mono Association for the Handicapped's civil rights program, and the procedures to file a complaint, contact 760-873-8668; email title.vi.complaint@imahstars.org; or visit our administrative office at 371 S. Warren Street, Bishop, CA. For more information, visit www.imahstars.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 760-873-8668.

Notificación al Público de los Derechos de en Aplicación del Título VI

Inyo-Mono Association for the Handicapped

- Inyo Mono Association for the Handicapped opera sus programas y servicios con relación de la raza, de color, y origen nacional, de conformidad con el Título VI del Acta de Derechos Civil. 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 Inyo Mono Association for the Handicapped.
- Para obtener más información sobre el programa de derechos civiles de Inyo Mono Association for the Handicapped, y los procedimientos para presentar una queja, comuníquese con 760-873-8668: Email title.vi.complaint@imahstars.org, o visite nuestras oficinas administrativas en 371 S. Warren St, Bishop, CA. Para obtener más información, visite www.imahstars.org.
- Una queja puede presentarse directamente con la Administración Federal de Tránsito mediante la presentación de una queja ante la Oficina de Derechos Civiles, Atención: Coordinador de Programa del Título VI: Edificio Este, 5 ° piso-TRC, 1200 New Jersey Ave, NW, Washington, DC 20590.

● If information is needed in another language, contact 760-873-8668.

Updated: 4/30/2014, Reviewed 3/30/17

List of Locations Where Title VI Notice Is Posted

Inyo-Mono Association for the Handicapped's Title VI notice to the public is currently posted at the following locations:

Location	Address	City
Bishop Office	371 South Warren Street	Bishop, CA
Bishop Conference Room	371 South Warren Street	Bishop, CA
IMAH Vehicles	Inyo County	
Website	www.imahstars.org	

The Title VI notice and program information is also provided on Inyo-Mono Association for the Handicapped's website at:

www.imahstars.org

Title VI Complaint Procedures

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

Within 10 business days of receiving the complaint, Inyo-Mono Association for the Handicapped 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. Inyo-Mono Association for the Handicapped 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, Inyo-Mono Association for the Handicapped 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 Inyo-Mono Association for the Handicapped 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.

Inyo-Mono Association for the Handicapped Title VI Complaint Form

TITLE VI COMPLAINT FORM

Section I: Please write legibly		
1. Name:		
2. Address:		
3. Telephone:	3.a. Secondary Phone <i>(Optional)</i> :	
4. Email Address:		
5. Accessible Format Requirements?	<input type="checkbox"/> Large Print	<input type="checkbox"/> Audio Tape
	<input type="checkbox"/> TDD	<input type="checkbox"/> Other
Section II:		
6. Are you filing this complaint on your own behalf?	YES*	NO
*If you answered "yes" to #6, go to Section III.		
7. If you answered "no" to #6, what is the name of the person for whom you are filing this complaint? Name:		
8. What is your relationship with this individual:		
9. Please explain why you have filed for a third party:		
10. Please confirm that you have obtained permission of the aggrieved party to file on their behalf.	YES	NO
Section III:		
11. I believe the discrimination I experienced was based on <i>(check all that apply)</i> :		
<input type="checkbox"/> Race	<input type="checkbox"/> Color	<input type="checkbox"/> National Origin
12. Date of alleged discrimination: <i>(mm/dd/yyyy)</i>		

13. Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known), as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.

Inyo-Mono Association for the Handicapped Title VI Complaint Form, Page 2

Section IV:

14. Have you previously filed a Title VI complaint with Inyo-Mono Association for the Handicapped?

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 _____

Submit form and any additional information to:

Beth Himelhoch, Executive Director

INYO-MONO ASSOCIATION FOR THE HANDICAPPED, Executive Director

371 S. Warren St.

Bishop, CA 93514

Phone: 760.873.8668

Fax: 760.872.1377

Email: execdir@imahstars.org

Procedimientos de Queja Título VI

Como reciepiend de dólares federales, Inyo Mono Association for the Hancdicapped se requere cumplir con el Título VI del Acta de Derechos Civiles de 1964 y asegurar que los servicios y los beneficios se proporcionan en un fundamento no discriminatoria. Inyo Mono Association for the Handicapped tiene su lugar de procedimiento de queja Título VI, que describe un proceso para la disposición local de las quejas del Título VI y es coherente con las directrices que se encuentran en el Federal Administracion Circular 4702.1B, fechado en octubre de 1.2012.

Cualquier persona que cree que él o ella ha sido víctima de discriminación por su raza, color, o origen nacional por Inyo Mono Association for the Handicapped puede presentar una queja con el Título VI completando y enviar formulario de queja del Título VI de la agencia. Inyo-Mono Association for the Handicapped investiga quejas recibió no más de 180 días después de la supuesta incidenete. Inyo Mono Association for the Handicapped sólo procesará las denuncias que son completas.

the Handicapped la revisará para determinar si nuestra oficina tiene jurisdicción. La queja recibirá una carta de confirmación informándole a él / ella si la queja será investigada por nuestra oficina. Inyo Mono Association for the Handicapped tiene 30 Dentro de los 10 días hábiles después de recibir la queja, Inyo Mono Association for días para investigar la denuncia. La denuncia será notificada escritura de la causa a cualquier ampliación prevista por la regla de 30 días.

Si se necesita más información para resolver el caso, Inyo Mono Association for the Handicapped puede comunicarse con la denunciante. El demandante tiene 10 días hábiles desde la fecha de la carta a enviada la información solicitada el investigador asignado al caso. Si el investigador no está en contacto con el reclamante o no recibe la información adicional dentro de los 10 días hábiles Inyo Mono Association for the Handicapped 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 encontrar. Una carta de conclusión resume los hechos denunciados, y afirma que no hubo una violación del Título VI, y que el caso se cerrará. Una carta de conclusión resume los hechos denunciados y las entrevistas sobre el incidente alegada, y explica si una acción disciplinaria, la formación adicional del miembro del personal, o otra acción ocurrirá. Si el demandante desea apelar la decisión, él / ella tiene 10 días hábiles después de que la fecha de la carta para hacerlo.

Una persona también puede presentar una queja directamente con la Administración Federal de Tránsito, En FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590

Formulario de Queja Título VI de Inyo-Mono Association for the Handicapped

Formulario de Queja Título VI

Section I: Please write legibly		
1. Nombre:		
2. Direccion:		
3. Telefono:	3.a. Teléfono secundaria (opcional):	
4. Dirección de correo electrónico:		
5. Requisitos formato accesible?	<input type="checkbox"/> Letra Grande	<input type="checkbox"/> Cinta de audio
	<input type="checkbox"/> TDD	<input type="checkbox"/> Otros
Section II:		
6. ¿Está presentando esta queja de parte de usted?	Si*	NO
* Si usted contestó "sí" a # 6, vaya a la Sección III.		
7. Si usted contestó "no" a la # 6, ¿cuál es el nombre de la persona para la cual usted está presentando esta queja? Nombre:		
8.¿Cuál es su relación con esta persona:		
9. Por favor, explique por qué usted ha presentado para un tercero:		
10. Por favor, confirme que ha obtenido el permiso de la parte agraviada para presentar en su nombre.	Si	NO
Section III:		
11. Creo que la discriminación que experimenté fue basada en (marque todo lo que corresponda):		
<input type="checkbox"/> Raza <input type="checkbox"/> Color <input type="checkbox"/> Origen Nacional		
12. Fecha de la supuesta discriminación : (dd / mm / aaaa)		
13. Explique lo más claramente posible lo que pasó y por qué cree que fue discriminado. Describir todas las personas que estuvieron involucradas. Incluya el nombre y la información de contacto de la persona (s) que lo discriminó (si se conoce), así como los nombres y la información de los testigos en contacto. Si se necesita más espacio, por favor use el reverso de este formulario.		

Formulario de Queja de: Inyo-Mono Association for the Handicapped Titulo VI, Pagina 2

Section IV:		
14. ¿Ha presentado anteriormente una queja del Título VI con Inyo-Mono Association for the Handicapped?	SI	NO
Section V:		
15 ¿Ha presentado esta queja con cualquier otro federal, estatal o local, o ante cualquier tribunal federal o estatal? <input type="checkbox"/> SI* <input type="checkbox"/> NO		
En caso afirmativo, marque todo lo que corresponda:		
<input type="checkbox"/> Agencia Federal _____ <input type="checkbox"/> Agencia Estatal _____		
<input type="checkbox"/> Tribunal Federal _____ <input type="checkbox"/> Agencia local _____		
<input type="checkbox"/> Tribunal Estatal _____		
16. Si usted contestó "sí" a la # 15, proporcionar información acerca de una persona de contacto en la agencia / tribunal donde se presentó la queja.		
Nombre:		
Título:		
Agencia:		
Dirección:		
Telefono:		Email:
Section VI:		
Nombre de la queja es contra la Agencia de Tránsito:		
Persona de contacto:		
Telefono:		

Puede adjuntar cualquier material escrito o cualquier otra información que usted considere relevante para su queja. Signature and date are required below to complete form:

Firma _____ Fecha _____

Envíe el formulario y cualquier información adicional a:

Beth Himelhoch, Director Ejecutiva

INYO-MONO ASSOCIATION FOR THE HANDICAPPED, Director Ejecutivo

371 S. Warren St.

Bishop, CA 93514

Telefono: 760.873.8668

Fax: 760.872.1377

Email: execdir@imahstars.org

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

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 Inyo-Mono Association for the Handicapped

Inyo-Mono Association for the Handicapped is a non-profit 501(c)(3) organization that provides a variety of services and programs for adults, aged 18 and older, who are developmentally disabled.

A developmental disability is a condition that originates before an individual reaches 18 and can be expected to continue indefinitely. Developmental disabilities include mental retardation, epilepsy, cerebral palsy, autism, as well as other disabling conditions requiring treatment similar to those with mental retardation. Once a doctor makes a determination of developmental disability the client is referred to a regional center.

Inyo-Mono Association for the Handicapped works only with clients who are referred to the program by a regional center. The adults served by Inyo-Mono Association for the Handicapped have been referred by Kern Regional Center which encompasses the area of Kern, Inyo and Mono Counties.

The types of programs include an activity center, work-adjustment training, employment services, job coaching, supported living services, community integration training, micro-enterprise development and customized employment.

Inyo-Mono Association for the Handicapped is licensed by the State of California Health and Human Services Department of Social Services Community Care Licensing Division. We are licensed to serve a maximum of 30 clients. Services for the program are purchased by Kern Regional Center and is the sole referral agency for Inyo-Mono Association for the Handicapped. The program does not serve the general public but rather a limited population of adults with intellectual and developmental disabilities.

The adults Inyo-Mono Association for the Handicapped serve have intellectual and developmental disabilities. Because of our rural area and the fact that we are the only program in Inyo and Mono Counties providing these type of services to this population, we serve the entire spectrum from severely disabled to high functioning. Our lower functioning clientele require a higher level of supervision and have little to no literacy skills. Generally, any documents presented to these participants are translated orally due to the level of disability. Our higher functioning clients have various skill levels and the ability to learn job skills that enable them to seek employment. Documents presented to these participants require some oral translation and discussion as to what the written document means.

Currently 100% of our participants receive SSI benefits which are largely determined by limited resources and income.

Inyo-Mono Association for the Handicapped's program includes work-adjustment training, self-advocacy, vocational skills, personal health and safety, community integration and recreation. We also offer an educational curriculum which focuses on reading comprehension, math skills, money management and nutrition. Other programs and services include supported employment, supported living services, community integration, micro-enterprise development and customized employment.

We provide transportation to and from our agency for our clientele travelling over 600 miles a day. As stated above, we live in a very rural area with towns scattered throughout Inyo and Mono Counties. We also provide transportation for our clients to and from work, to and from medical appointments and for our various recreational outings. Because of our limited exposure, the scope and provision of transportation service has insignificant impact on the general public and minority and low-income populations in the geographic area. This agency, however, does maintain systems to gather stakeholder input regarding agency services and conducts public relations and outreach activities in order to create meaningful opportunities for public engagement as outlined below.

Inyo-Mono Association for the Handicapped is committed to providing an open and visible decision-making process to which our adults with intellectual and developmental disabilities have equal access. It is the policy of Inyo-Mono Association for the Handicapped to actively solicit the involvement of our clients and their caregivers in the decision-making process, through notification, local meetings, and personal phone calls.

Purposes of this Plan

Public participation is the process through which stakeholders can partake directly in agency decision-making, and express their concerns, desires and values. It is the mission of Inyo-Mono Association for the Handicapped to "promote an independent and fulfilling lifestyle for each adult who is intellectually disabled living in Inyo and Mono Counties." At every opportunity through prescribed methods the agency will solicit input from stakeholders in order to best support persons served without creating disproportionately high and adverse human health or environmental effects on minority and/or low-income populations.

Outreach Plan

Annual meetings are held with each client and their families and/or caregiver. At these meetings a method for communicating is discussed, whether it is in writing, phone or in person and which language (Spanish or English) they would prefer.

Inyo-Mono Association for the Handicapped has an open door policy. When there are any issues, the clients and/or caregivers feel free to discuss them with either the Executive Director, Workshop Director or the Administrator and Director of Supported Living Services. These meetings are held in the language of choice which currently is English or Spanish.

Inyo-Mono Association for the Handicapped holds monthly Board of Director meetings. These meetings are open to the public and will be translated by staff whenever requested.

Inyo-Mono Association for the Handicapped attends many meetings and networks with the public listening to comments, criticisms and needs of the population served by this program.

The Executive Director reaches out to the five Indian Reservations that are located in Inyo and Mono Counties and the other minority populations that live in the two county area. The main focus for the Executive Director is to educate others about the programs and services provided by Inyo-Mono Association for the Handicapped.

The Director has also offered services to aid in writing 5310 grants and other help as needed.

Below is a brief list of the many meetings and outreach efforts made in Calendar Years 2014 through 2017.

Summary of Outreach Efforts Made Calendar Years 2015 & 2016

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

Board Meetings Open to the Public

Inyo-Mono Association for the Handicapped monthly Board meetings are open to the public and announced in the paper and radio.

Local Transportation Committee

Inyo-Mono Association attends the monthly meetings of the Local Transportation Committee to provide any guidance on transit related issues for individuals with intellectual and developmental disabilities.

Social Service Transportation Advisory Committee – Inyo County

Inyo-Mono Association for the Handicapped is an active member in the Inyo County Social Services Transportation Advisory Committee, providing expert guidance on transit related issues for individuals with intellectual and developmental disabilities. The committee meets annually and conducts outreach to minority and low-income populations in order to address unmet needs. These workshops are held annually in Bishop the county's population center and in the southern section of the county in Independence.

Social Service Transportation Advisory Committee – Mono County

In Mono County, Inyo-Mono Association for the Handicapped is an active member in the Mono County Social Service Transportation Advisory Committee providing expert guidance on transit related issues for individuals with intellectual and developmental disabilities. The committee meets annually and conducts outreach to minority and low-income populations in order to address unmet needs. These workshops are held annually during the regularly scheduled Local Transportation Committee meeting in April of each year.

Inyo-Mono Counties Coordinated Public Transit – Human Services Transportation Plan Update

Inyo-Mono Association for the Handicapped took part in the Study Process for the plan update. IMAH's Executive Director was a participant in the Public Workshop held in Bishop on December 10, 2013. The Executive Director also made additions and corrections to the draft plan. The Director works closely with the Transit Analyst for Eastern Sierra Transit Authority making sure the updated coordinated plan meets the needs of the transit dependent public

Multi-Disciplinary Task Force

Inyo-Mono Association for the Handicapped participates in quarterly meetings where people who are at risk are brought to the attention of agencies such as law enforcement, social services, mental health, etc.

Unified Command

Inyo-Mono Association for the Handicapped has participated with this group for over seven years meeting quarterly to discuss possible emergency situations, updates on past disasters and future trainings. Inyo County's Evacuation Plan specifically addresses the needs of populations at risk including disabled, minority and low-income. The Unified Command also includes a coordinated plan in which Inyo-Mono Association for the Handicapped will provide vehicles, transportation and possible shelter during evacuation emergencies.

Inyo-Mono Advocates for Community Action

Inyo-Mono Association for the Handicapped's Executive Director has been a member of this agency for over thirteen years. This action agency provides programs and services for disabled, low-income and minority populations who live in both Inyo and Mono Counties. Inyo-Mono Association for the Handicapped provides guidance with transportation issues and attempt to coordinate transportation for the disabled, minority and low-income population.

Altrusa International

Inyo-Mono Association for the Handicapped maintains an on-going partnership with this club and provides coordinated transportation assistance via the agency's FTA 5310 vehicle.

Human Services Advisory Committee – Cerro Coso College

Inyo-Mono Association for the Handicapped's Executive Director is a member of this committee which meets quarterly. Topics of discussion include educational offerings and how to better serve the disabled, minority and low-income population. We provide guidance on types of coordinated transportation services that we can provide the disabled, minority and low-income population.

Client Annual Reviews

All adults and their families and/or caregivers and the client's respective Kern Regional Service Coordinator meet with IMAH staff to discuss their transportation needs as it pertains to our program services.

Kern Regional Center

Bi-lingual staff from Inyo-Mono Association for the Handicapped provides translation services when needed for the Spanish speaking population of developmentally disabled served by Kern Regional Center.

Annual Satisfaction Surveys

Inyo-Mono Association for the Handicapped conducts Annual Satisfaction Surveys with program participants, families, caregivers and stakeholders of the agency to determine level of satisfaction and gain input regarding unmet needs.

IMAH's Sierra Thrift Mall

Inyo-Mono Association for the Handicapped has a thrift store on site which offers work-adjustment training for adults with developmental disabilities. The store serves the economically disadvantaged which includes a large proportion of the Spanish speaking population. Notices for un-met transit needs hearings are posted in the store in both English and Spanish. Eastern Sierra Transit Agency's routes are also available to customers in both English and Spanish.

Inyo-Mono Association for the Handicapped website

Currently, Inyo-Mono Association for the Handicapped posts notices and announcements on the agency's website. Additional public input can be obtained by the Title VI Complaint Form, which is available as a download in English and Spanish.

The agency's Executive Director also sets annual marketing and outreach goals. Outreach activities throughout the year include public engagements, open houses and press releases. Our Annual Marketing Plan includes Public Relations, Employee and Consumer Relations, Program Development and Enhancement. Annual and monthly In-Service training program for staff is included in this plan.

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

Four Factor Analysis

Factor 1

The number or proportion of LEP persons in the service area who may be served or are likely to require Inyo-Mono Association for the Handicapped Services

Inyo-Mono Association for the Handicapped holds a unique position in regard to meeting the Title VI requirements. As a sub-recipient of FTA 5310 Grant funding, the agency's focus is primarily to transport adults with intellectual and developmental disabilities where current public transit options are insufficient or do not exist. Eligible program participants or "riders" must be referred into the program by Regional Centers, mainly Kern Regional Center. As such, Inyo-Mono Association for the Handicapped does not offer transportation to the general public other than in situations involving a coordinated plan with other entities. Therefore, an analysis of public demographic data in Inyo and Mono Counties does not represent actual populations served by this program but is offered for comparison purposes only.

There are two sources of data that most accurately represent LEP persons likely to be served by the program. The Kern Regional Center Performance Report for fiscal year 2012/2013 shows purchase of service (POS) authorizations, expenditures and utilization by different demographic categories including language. Inyo-Mono Association for the Handicapped receives case histories of each program participant and maintains a database of information. A historical analysis of this database in regard to language proficiency of all past and present participants will reflect actual proportions of LEP persons served.

American Community Survey

Inyo-Mono Association for the Handicapped staff reviewed the 2010 U.S. Census Report and determined that 11,752 persons in the Inyo-Mono Association for the Handicapped service area or (38.7%) of the population speak a language other than English. Of those 2,218 persons have limited English proficiency; that is they speak English "not well" or "not at all". This is only 7.3% of the overall population in the service area. Of those persons with limited English proficiency in Inyo-Mono Association for the Handicapped's service area, 2,077 (6.84%) speak Spanish. No other languages account for more than 5% of the total population.

Appendix A – Census Data

Kern Regional Center (KRC) Expenditures

The Kern Regional Center Purchase of Service and Demographic Data Report for Fiscal Year 2013 identifies total annual expenditures and authorized services purchased. The report shows expenditures for services by primary language spoken but does not ascertain whether English is also spoken “very well”. As indicated in the Inyo and Mono County analysis above, Spanish is consistently the primary language for LEP populations. The report further breaks down by age group for ages 22 and older. Inyo-Mono Association for the Handicapped would be included in this category as a provider of services that are purchased by Kern Regional Center.

The report indicates that authorized services for ages 22 and older in FY 2013 totaled \$112,656,667 with total expenditures being \$83,246,958. Of that total, \$73,916,728 (88.8%) was spent on English speaking consumers and \$7,575,025 (9.1%) was spent on Spanish speaking consumers. Expenditures for other languages totaled less than 3%.

By comparison, the Inyo-Mono Association for the Handicapped revenue received from Kern Regional Center in FY 2013 amounts to approximately .6% of the total KRC authorized services purchased. Theoretically, if this percentage were applied to the services purchased for Spanish speaking consumers (\$7,575,025), it would equate to the revenue necessary to provide service to only 1 Inyo-Mono Association for the Handicapped consumer. If it is assumed that this one consumer speaks Spanish as a primary language, it remains unclear how many would speak English less than “very well”.

Historical Analysis of LEP Persons Served by Inyo-Mono Association for the Handicapped

A final source of data to be considered to determine the number of LEP persons likely to be served by this program is a client-by-client analysis of all consumers served since 2001. (The agency has been in existence since 1973, but dependable statistics could only be obtained from 2001 on.) The Inyo-Mono Association for the Handicapped has served a total of 72 persons including the consumers currently enrolled. In analysis of the language proficiency of all the clients, 63% spoke English “very well”, 22% spoke less than “very well” and 15% were non-verbal due to their disability or spoke very little. Those clients who are non-verbal do understand spoken English.

Additionally, consumers of this program who speak English or any other language less than “very well” typically have intellectual and developmental disabilities that cause barriers to speech or other forms of communication. Limited English Proficiency is not

present in this population solely due to a language barrier. Thus, translation of vital documents into a native language is generally ineffective. Translations of vital documents may be done for the families of the client who are also ancillary beneficiaries of the program.

An examination of consumers who have exited the program reveals that consumers exited primarily for reasons such as relocation or successful transition high programs. There were no clients that were underserved or exited the program due to language barriers.

Factor 2

The frequency with which LEP persons come in contact with Inyo-Mono Association for the Handicapped Services

As indicated above, historically, contact with LEP consumers has not yet occurred in this program. We do have parents of consumers who need translation both in written and interpretation. Currently two families prefer to have all information translated and request an interpreter. Inyo-Mono Association for the Handicapped has bi-lingual staff that provide interpretation and translation of program documents and services to those clients and families/caregivers who request the service.

Factor 3

The Nature and Importance of Services Provided by Inyo-Mono Association for the Handicapped to the LEP Population

The primary purpose of the Inyo-Mono Association for the Handicapped is to provide training opportunities that foster personal growth for adults with intellectual and developmental disabilities. Transportation is offered to and from the program and daily during specific activities, medical appointments and other required functions. Because of our rural area transportation is a vital part of the services offered our consumers. Without this service most of our clients would be unable to attend our various programs.

Inyo-Mono Association for the Handicapped travels over 625 miles a day bringing our clients to and from the program. Because of our rural area, 90% of our adults would be left without any viable means of transportation.

As stated above, we live in a very rural area with towns scattered throughout Inyo and Mono Counties. We also provide transportation for our clients to and from work, to and from medical appointments and for our various recreational outings.

Our area does not have rapid transit. We are served by Eastern Sierra Transit Agency, but their transportation services offered do not reach some of the more rural areas where our clients live.

Currently, Inyo-Mono Association for the Handicapped serves 36 consumers who live in both Inyo and Mono Counties. The length of time an individual receives our services can range from several to many years. Consumers are not required to “graduate” and many remain in the program as long as their needs continue to be met.

While the Inyo-Mono Association for the Handicapped program is relatively small, it is a vital service to this population. We are the only program in this two county area that provides these programs and services. Inyo-Mono Association for the Handicapped creates opportunities that can enhance the quality of life for adults with intellectual and developmental disabilities.

Factor 4

The resources available to Inyo-Mono Association for the Handicapped and overall cost to provide LEP assistance.

The Inyo-Mono Association for the Handicapped operating budget does not have a specific line item for providing language access and outreach. Outreach expenses as they relate to LEP populations are split among several departments depending on which department is responsible for the outreach. Costs for translation of documents is minimal and has not been quantified. Significant outreach budget allocations for the agency during the last two years include but are not limited to:

- Redesign of agency web page: \$3,750
- Ads in local publications and on local radio: \$15,000
- Annual Open House: \$3,000

The budget for Inyo-Mono Association for the Handicapped, which provides transportation services through the FTA 5310 grant, is a small fraction of the agency’s budget. The total annual expenditures for outreach activities is less than \$1,000. Specific outreach to LEP populations has not been conducted as a reasonably significant number of LEP persons has not been served by this program, as indicated in Factor 1.

The rates for purchase of service that Inyo-Mono Association for the Handicapped receives from KRC as its sole source of service revenue were originally set in 1998. These rates were set with the cost-of-living index from 1998 and have not increased in

the last 16 years, while the cost of living has continued to rise. In fact, rates, and subsequently the program's revenue, were reduced for a number of years by up to 4.25%, further compounding the effects of a rate system that has not grown with the economy. Several cost-cutting measures have been implemented in order to remain financially solvent, including areas such as advertising and outreach.

Summary

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

- It is likely that Kern Regional Center provided funding for only one consumer that spoke Spanish as a primary language in the 2012-2013 fiscal year. English proficiency of that one consumer is unknown.
- Inyo-Mono Association for the Handicapped has not provided verbal or written translation services to our direct clients/consumers in the last 14 years; however, two families of the clients/consumers are currently LEP and verbal and written translation services are provided.
- Language proficiency is primarily affected by disability rather than a language barrier alone.
- No consumers were underserved or exited the program due to language barriers.
- Two families are currently LEP and receive translation and interpreter services by Inyo-Mono Association for the Handicapped bi-lingual staff.
- Provision of transit is a vital service offered our consumers. Without this service most of our clients would be unable to participate or benefit from our program.
- Inyo-Mono Association for the Handicapped does not have an LEP specific budget line.
- Inyo-Mono Association for the Handicapped spends less than \$1,000 per year on all outreach efforts.
- Daily revenue rate for program services is 16 years old with no cost-of-living adjustment.

Language Assistance Implementation Plan

Methodologies

Identifying LEP Individuals

As evidenced by the Four Factor Analysis, very few "true" LEP individuals are referred to the Inyo-Mono Association for the Handicapped program. The consumers that are primarily served by the Inyo-Mono Association for the Handicapped program have disabilities that affect language proficiency rather than a language barrier alone.

While there is a substantial minority population in the region, according to the Kern Regional Center Purchase of Service and Demographic Data Report, the funds allocated to the Hispanic language population is minimal. In the 41 year history of the program there were no consumers served who were LEP due strictly to a language barrier. The agency does, however, have systems in place to provide access to our Spanish speaking population.

Providing Services

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

- Title VI Notice to the Public
- Title VI Complaint Form
- Title VI Complaint Procedures
- Consumer Program Handbook including Grievance Policy
- Agency website Title VI information
- Monthly calendar of events

Other documents can be translated to Spanish orally as appropriate. Due to the low literacy rate of consumers in the Inyo-Mono Association for the Handicapped program, most documents are translated orally. Written documents are translated for families of LEP consumers upon request and interpretation services are offered.

Communicating Availability of Language Assistance

Individuals who are referred to Inyo-Mono Association for the Handicapped program for services are given one-on-one guidance and program planning. Staff can offer Spanish translation services as needed. Agency bi-lingual staff can also offer translation services to guests and consumers' family members as appropriate.

If an LEP person and/or family who speaks a language other than Spanish is referred to Inyo-Mono Association for the Handicapped, staff is instructed to utilize such resources as Northern Inyo Hospital which provides translation services for their consumers.

Monitoring

Translation services have been requested by two families. Bi-lingual staff are available for translation both orally and written.

Inyo-Mono Association for the Handicapped maintains an Agency Accessibility Plan which is designed to minimize barriers that are created by architectural factors, environmental factors, attitudinal factors, financial and employment barriers and communication barriers such as language. This plan is reviewed and updated annually.

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

Staff Training

The following training will be provided to Inyo-Mono Association for the Handicapped staff:

1. Information on the Inyo-Mono Association for the Handicapped Title VI procedures and LEP responsibilities.
2. Description of language assistance services offered to the public.
3. Use of "I Speak Cards".
4. Documentation of language assistance requests.
5. How to handle a Potential Title VI/LEP complaint.

Inyo-Mono Association for the Handicapped conducts monthly In-Service training for staff that can include Customer Service and Language Assistance training.

As a part of the Accessibility Plan, the agency encourages staff interest and education in learning to more effectively communicate with individuals served in Inyo-Mono Association for the Handicapped's programs. The agency through its continuing education benefits program encourages staff to enroll in college classes.

Safe Harbor Provision

The Federal Transit Authority Circular 4702.1B states:

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

These safe harbor provisions apply to the translation of written documents only. They do not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable. A recipient may determine, based on the Four Factor Analysis, that even though a language group meets the threshold specified by the Safe Harbor Provision, written translation may not be an effective means to provide language assistance measures. For example, a recipient may determine that a large number of persons in that language group have low literacy skills in their native language and therefore require oral interpretation. In such cases, background documentation regarding the determination shall be provided to FTA in the Title VI Program."

As previously stated, the Inyo-Mono Association for the Handicapped program serves individuals with minimal to severe intellectual and developmental disabilities who require a minimum to high level of supervision. As such, the majority of consumers have very limited literacy skills and most are unable to read or write. Program documents are generally interpreted orally by direct care providers.

Membership of Non-Elected Committees and Councils

Inyo-Mono Association for the Handicapped does not have a non-elected transit related advisory council at this time.

Title VI Equity Analysis

Inyo-Mono Association for the Handicapped does not have transit related facilities.

Resolution 2014-01

**Board of Directors Approval of
Inyo-Mono Association for the Handicapped, Inc.
Title VI Program**

**A RESOLUTION OF THE Inyo-Mono Association for the
Handicapped, Inc. BOARD OF DIRECTORS AUTHORIZING THE
TITLE VI COMPLIANCE PLAN FOR THE AGENCY.**

WHEREAS, Inyo-Mono Association for the Handicapped, Inc. 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 Inyo-Mono Association for the Handicapped, Inc. as follows:

1. The Executive Director is authorized to implement the components of the plan in order to meet Federal requirements.
2. The Executive Director 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 Inyo-Mono Association for the Handicapped, State of California, on this 20th day of March, 2014.

President of the Board

Appendix A

Languages Spoken at Home by Ability to Speak English for the Population 5 Years and Over

2006-2010 American Community Survey

	Inyo County, California	Mono County, California	Inyo/Mono Total	
	Estimate	Estimate	Estimate	Percent
Total:	17,374	12,992	30,366	100.00 %
Speak only English	14,627	9,863	24,490	80.65%
Spanish or Spanish Creole:	2,274	2,596	4,870	16.04%
Speak English "very well"	1,393	1,400	2,793	9.20%
Speak English less than "very well"	881	1,196	2,077	6.84%
French (incl. Patois, Cajun):	157	0	157	0.52%
Speak English "very well"	157	0	157	7.56%
Speak English less than "very well"	0	0	0	0.00%
French Creole:	0	3	3	0.01%
Speak English "very well"	0	3	3	0.01%
Speak English less than "very well"	0	0	0	#REF!
Italian:	0	39	39	0.13%
Speak English "very well"	0	39	39	0.13%
Speak English less than "very well"	0	0	0	0.00%
Portuguese or Portuguese Creole:	8	0	8	0.03%
Speak English "very well"	8	0	8	0.03%
Speak English less than "very well"	0	0	0	0.00%
German:	41	132	173	0.57%
Speak English "very well"	41	110	151	0.50%
Speak English less than "very well"	0	22	22	0.07%
Yiddish:	0	0	0	0.00%
Speak English "very well"	0	0	0	0.00%
Speak English less than "very well"	0	0	0	0.00%
Other West Germanic languages:	42	76	118	0.39%
Speak English "very well"	28	76	104	0.34%
Speak English less than "very well"	14	0	14	0.05%
Scandinavian languages:	0	35	35	0.12%
Speak English "very well"	0	35	35	0.12%
Speak English less than "very well"	0	0	0	0.00%
Greek:	0	36	36	0.12%

Updated: 4/30/2014, Reviewed 3/30/17

Inyo-Mono Association for the Handicapped
Title VI Program

Speak English "very well"	0	36	36	0.12%
Speak English less than "very well"	0	0	0	0.00%
Russian:	0	37	37	0.12%
Speak English "very well"	0	0	0	0.00%
Speak English less than "very well"	0	37	37	0.12%
Polish:	0	0	0	0.00%
Speak English "very well"	0	0	0	0.00%
Speak English less than "very well"	0	0	0	0.00%
Serbo-Croatian:	0	0	0	0.00%
Speak English "very well"	0	0	0	0.00%
Speak English less than "very well"	0	0	0	0.00%
Other Slavic languages:	0	0	0	0.00%
Speak English "very well"	0	0	0	0.00%
Speak English less than "very well"	0	0	0	0.00%
Armenian:	0	0	0	0.00%
Speak English "very well"	0	0	0	0.00%
Speak English less than "very well"	0	0	0	0.00%
Persian:	0	20	20	0.07%
Speak English "very well"	0	20	20	0.07%
Speak English less than "very well"	0	0	0	0.00%
Gujarati:	0	0	0	0.00%
Speak English "very well"	0	0	0	0.00%
Speak English less than "very well"	0	0	0	0.00%
Hindi:	0	0	0	0.00%
Speak English "very well"	0	0	0	0.00%
Speak English less than "very well"	0	0	0	0.00%
Urdu:	0	0	0	0.00%
Speak English "very well"	0	0	0	0.00%
Speak English less than "very well"	0	0	0	0.00%
Other Indic languages:	0	0	0	0.00%
Speak English "very well"	0	0	0	0.00%
Speak English less than "very well"	0	0	0	0.00%
Other Indo-European languages:	0	46	46	0.15%
Speak English "very well"	0	46	46	0.15%
Speak English less than "very well"	0	0	0	0.00%
Chinese:	25	0	25	0.08%
Speak English "very well"	15	0	15	0.05%
Speak English less than "very well"	10	0	10	0.03%
Japanese:	0	0	0	0.00%
Speak English "very well"	0	0	0	0.00%
Speak English less than "very well"	0	0	0	0.00%

Updated: 4/30/2014, Reviewed 3/30/17

Inyo-Mono Association for the Handicapped
Title VI Program

Korean:	55	0	55	0.18%
Speak English "very well"	21	0	21	0.07%
Speak English less than "very well"	34	0	34	0.11%
Mon-Khmer, Cambodian:	0	0	0	0.00%
Speak English "very well"	0	0	0	0.00%
Speak English less than "very well"	0	0	0	0.00%
Hmong:	0	0	0	0.00%
Speak English "very well"	0	0	0	0.00%
Speak English less than "very well"	0	0	0	0.00%
Thai:	0	8	8	0.03%
Speak English "very well"	0	8	8	0.03%
Speak English less than "very well"	0	0	0	0.00%
Laotian:	0	0	0	0.00%
Speak English "very well"	0	0	0	0.00%
Speak English less than "very well"	0	0	0	0.00%
Vietnamese:	0	3	3	0.01%
Speak English "very well"	0	0	0	0.00%
Speak English less than "very well"	0	3	3	0.01%
Other Asian languages:	0	0	0	0.00%
Speak English "very well"	0	0	0	0.00%
Speak English less than "very well"	0	0	0	0.00%
Tagalog:	8	94	102	0.34%
Speak English "very well"	8	94	102	0.34%
Speak English less than "very well"	0	0	0	0.00%
Other Pacific Island languages:	0	0	0	0.00%
Speak English "very well"	0	0	0	0.00%
Speak English less than "very well"	0	0	0	0.00%
Navajo:	5	0	5	0.02%
Speak English "very well"	5	0	5	0.02%
Speak English less than "very well"	0	0	0	0.00%
Other Native North American languages:	132	4	136	0.45%
Speak English "very well"	111	4	115	0.38%
Speak English less than "very well"	21	0	21	0.07%
Hungarian:	0	0	0	0.00%
Speak English "very well"	0	0	0	0.00%
Speak English less than "very well"	0	0	0	0.00%
Arabic:	0	0	0	0.00%
Speak English "very well"	0	0	0	0.00%
Speak English less than "very well"	0	0	0	0.00%
Hebrew:	0	0	0	0.00%

Updated: 4/30/2014, Reviewed 3/30/17

Inyo-Mono Association for the Handicapped
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Speak English "very well"	0	0	0	0.00%
Speak English less than "very well"	0	0	0	0.00%
African languages:	0	0	0	0.00%
Speak English "very well"	0	0	0	0.00%
Speak English less than "very well"	0	0	0	0.00%
Other and unspecified languages:	0	0	0	0.00%
Speak English "very well"	0	0	0	0.00%
Speak English less than "very well"	0	0	0	0.00%

Speak another language		11,752	38.70%
Speak English less than "very well"	2218		7.30%

100.00

%

92.70%