

Satellite Affordable Housing Associates Transportation Division (SAHA Transportation)

TITLE VI PROGRAM

**Developed: December 2014
Approved by SAHA Board**

**1521 University Avenue
Berkeley, CA 94703**

www.sahahomes.org

INTRODUCTION

This document was prepared by Satellite Affordable Housing Associates 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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SAHA Transportation Title VI Notice to the Public

Notifying the Public of Rights Under Title VI

SAHA Transportation

- SAHA Transportation 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 SAHA Transportation
- For more information on SAHA Transportation's civil rights program, and the procedures to file a complaint, contact 510-647-0700, or visit our administrative office at 1521 University Ave., Berkeley CA 94703. For more information, visit www.sahahomes.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 your building's service coordinator, or SAHA's central office 510-647-0700.

Title VI 權利公共通告

SAHA 交通

- SAHA 交通部經營之計劃和服務，根據民權法 Title VI，不論對象的種族、膚色、和原國籍，一視同仁。
- 任何人如認為她或他根據 Title VI 受到非法的歧視，可向 SAHA 交通部投訴。
- 有關 SAHA 交通部民權計劃詳情，以及提出投訴的程序，請聯絡 510-647-0700，或前往我們位於 1521 University Ave., Berkeley, CA 94703 的行政辦事處。詳情請瀏覽網頁 www.sahahomes.org。
- 投訴人可直接向聯邦交通管理局民權辦公室投訴，地址如下：Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590。
- 如需另一種語言的資料，請聯絡 510-647-0700。

Notificar al público de los derechos bajo el título VI

SAHA Transportation

- SAHA Transportation opera sus programas y servicios sin respecto a raza, color y origen nacional con arreglo al título VI de la Civil Ley de derechos.
- Cualquier persona que cree que él o ella ha sido agraviado por cualquier práctica discriminatoria ilegal bajo el título VI puede presentar una queja con SAHA Transportation
- Para obtener más información sobre el programa derechos civiles capaz de industrias y el procedimientos para presentar una queja, llame al 510-647-0700, o visite nuestra oficina administrativa en 1521 University Ave., Berkeley CA 94703. Para más información, visite www.sahahomes.org
- Un demandante puede presentar una queja directamente con el Federal Transit Administration por archivar una queja con la Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590
- Si se necesita información en otro idioma, contacte al Coordinador/a de Servicios en su edificio, o a la oficina central de SAHA al 510-647-0700.

List of Locations Where Title VI Notice Is Posted

SAHA Transportation notices to the public are currently posted at the following locations:

Location Name	Address	City
SAHA Corporate Office	1521 University Ave.	Berkeley, CA
Valdez Plaza	280 – 28 th St.	Oakland, CA
Columbia Park Manor	1780 Chester Dr.	Pittsburg, CA
Newark Gardens I	35300 Cedar Blvd.	Newark, CA
Casa Montego	1485 Montego	Walnut Creek, CA
Satellite Central	540 21 st St	Oakland, CA
Park Boulevard Apts	4135 Park Blvd	Oakland, CA
Glen Brook Terrace	4030 Panama Ct	Oakland, CA
Beth Asher	3549 Dimond Ave	Oakland, CA
Saint Andrew’s Manor	3250 San Pablo Ave	Oakland, CA
St. Patrick’s Terrace	1212 Center St	Oakland, CA
Otterbein Manor	5375 Manila Ave	Oakland ,CA
Linda Glen	32 Linda Ave	Oakland, CA
Newark Gardens II	35322 Cedar Blvd	Newark, CA
Fremont Oak Gardens	2681 Driscoll Rd	Fremont, CA
Amistad House	2050 Delaware St	Berkeley, CA
Montego Place	180 La Casa Via	Walnut Creek, CA
Harrison Towers	1621 Harrison St	Oakland, CA
Adel Court	2001 MacArthur Blvd.	Oakland, CA
Peter Babcock House	2350 Woolsey St.	Berkeley, CA
Orchard Senior Homes	2719 Foothill Blvd.	Oakland, CA
Merritt Crossing	609 Oak St.	Oakland, CA
Strawberry Creek Lodge	1320 Addison St	Berkeley, CA
SAHA Van 1	License 6AZL980	
SAHA Van 2	License 6AZL981	
SAHA Van 3	License 7ELC919	
SAHA Van 4	License 5V65561	
SAHA Van 5	License 7N17165	
SAHA Van 6	License 91216M1	

SAHA Backup Van	License 7K0304	
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When not in use, the 5310 Vehicles are stored at the following addresses:

Valdez Plaza	280 – 28 th St.	Oakland, CA
Columbia Park Manor	1780 Chester Dr.	Pittsburg, CA
Newark Gardens I	35300 Cedar Blvd.	Newark, CA
Casa Montego	1485 Montego	Walnut Creek, CA

The Title VI notice and program information is also provided on SAHA website
www.sahahomes.org

Title VI Complaint Procedures

As a recipient of federal dollars, SAHA Transportation 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. SAHA Transportation has in place a Title VI Complaint Procedure, which outlines a process for local disposition of Title VI complaints and is consistent with guidelines found in the Federal Transit Administration Circular 4702.1B, dated October 1, 2012.

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by SAHA Transportation may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form. SAHA Transportation investigates complaints received no more than 90 days after the alleged incident. SAHA Transportation will only process complaints that are complete.

Within 10 business days of receiving the complaint, SAHA Transportation will review it to determine if our office has jurisdiction. Upon completion of this 10 day review period, SAHA Transportation will send the complainant an acknowledgement letter informing her/him whether the complaint will be investigated by our office. SAHA Transportation 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, SAHA Transportation 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 SAHA Transportation can administratively close the case. The complainant may request more time to gather and provide information in support of the complaint, and must make this request in writing within the 10 business day response period. SAHA will grant the complainant an additional 10 business days upon written request.

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.

SAHA Transportation Title VI Complaint Form

COMPLAINT FORM

Section I: Please write legibly		
1. Name:		
2. Address: If in a SAHA residential building, please include Name of Building:		
3. Telephone:	3.a. Secondary Phone (<i>Optional</i>):	
4. Email Address (if applicable):		
5. Accessible Format Requirements? If not needed, put a line through this section or write N/A across section	<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 and specifically as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known), as well as names and contact information of any witnesses. If more space is needed, please attach additional sheets of paper.		

Section IV:		
14. Have you previously filed a Title VI complaint with SAHA Transportation?	YES	NO
Section V:		
15. Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court? [] YES* [] NO If yes, check all that apply: [] Federal Agency _____ [] State Agency _____ [] Federal Court _____ [] Local Agency _____ [] State Court _____		
16. If you answered "yes" to #15, provide information about a contact person at the agency/court where the complaint was filed.		
Name:		
Title:		
Agency:		
Address:		
Telephone:	Email:	
Section VI:		
Name of Transit Agency complaint is against:		
Contact Person:		
Telephone:		

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

Signature and date are required below to complete form:

Signature _____ Date _____

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

SAHA Transportation, Title VI Coordinator
1521 University Ave.
Berkeley, CA 94703

Titulo VI Procedimiento de Queja

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

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

En un periodo de 10 días de haber recibido la demanda, SAHA la revisara para determinar si nuestra oficina tiene la jurisdicción. El autor de la queja, recibirá un acuse de recibo informándole al denunciante que será notificado por escrito si el caso de él/ella el será investigado por nuestra oficina. SAHA tiene 30 días para investigar la queja.

Si necesita más información para resolver el caso, SAHA puede contactar al autor de la queja. El autor de la queja tiene 10 días de la fecha que recibió la carta para contestar el investigador del caso con más información. Si el investigador no recibe ninguna comunicación del autor de la queja en 10 días, SAHA Transportation puede cerrar el caso administrativamente. El autor puede pedir más tiempo para preparar su respuesta, y tiene que pedir más tiempo en una carta en un período de 10 días. SAHA le concederá al autor 10 días más, si el autor los solicite.

El caso se puede cerrar también si el autor de la queja no desea proseguir con el caso. Después de que el investigador analice la queja, él / ella emitirá una de las dos cartas a la denunciante.

FORMA DE QUEJA

Sección I: Escribir en forma legible		
1. Nombre:		
2. Direccion:		
3. Telefono:	3.a. Telefono secundario(<i>opcional</i>):	
4. Direccion de correo electronico:		
5. Requisa de forma accesible?	<input type="checkbox"/> Impresion grande	<input type="checkbox"/> Cinta de audio
	<input type="checkbox"/> TDD	<input type="checkbox"/> Otros
Seccion II:		
6. Está presentando esta queja en su propio nombre?	Si	No
*Si usted contesto "Si" to #6, vaya a la Sección III.		
7. If you answered "no" to #6, what is the name of the person for whom you are filing this complaint? Name:		
8.Cuál es su relación con este individuo:		
9. Por favor, explique por qué han presentado para una tercera parte:		
10. Por favor, confirme que ha obtenido el permiso de la parte agraviada en el archivo en su nombre.	Si	No
Seccion III:		
11.Creo que la discriminación que he experimentado fue basado en (<i>marque todas las que correspondan</i>):		
<input type="checkbox"/> Raza	<input type="checkbox"/> Color	<input type="checkbox"/> Origin nacional
12. Fecha de supuesta discriminación: (<i>mm/dd/aaaa</i>)		
13. Explica lo más claramente posible lo que ocurrió y por qué usted cree que son objeto discriminación. Describir todas las personas que han participado. Incluir el nombre y la información de contacto de la(s) persona(s) que discrimina contra usted (si se conoce), así como los nombres y la información de contacto de los testigos. Si se necesita más espacio, por favor adjunte hojas adicionales de papel.		

Sección IV:		
14. Anteriormente ha presentado un Título VI denuncia con la SAHA?	Si	No
Sección V:		
15. Ha presentado esta queja con cualquier otro local, estado o federal, o con cualquier Federal o Estado?		
[] Si* [] No si la respuesta es si		
Marque todo lo que aplique		
[] Agencia Federal _____ [] Agencia Estatal _____		
[] Federal Tribunal _____ [] Agencia Local _____		
[] Tribunal Estatal _____		
16. Si usted contesto "si" a la posición #15, proporcionan información acerca de una persona de contacto en la agencia/tribunal donde se presentó la denuncia.		
Nombre:		
Título:		
Organismo:		
Dirección:		
Teléfono:		Correo electrónico:
Sección VI:		
Nombre de organismo Transito denuncia es contra:		
Persona de contacto: Título		
Teléfono:		

Por favor de entregar esta forma a:

SAHA Title VI Coordinator
1521 University Ave
Berkeley California 94703

Title VI 投訴程序

作為受聯邦資助者，SAHA交通部需要遵守1964年民權法Title VI之規定，確保以無歧視性的方式提供服務和福利。SAHA交通部設定Title VI投訴程序，訂出本地處理Title VI投訴的程序，而該程序亦與2012年十月一日聯邦交通管理通告第4702.1B一致。

任何人如認為她或他因為種族、膚色、或原國籍而受到SAHA交通部之歧視，可填交機構的Title VI投訴表格，提出Title VI投訴。SAHA交通部在收到指控之事件的90天內，將進行投訴調查。SAHA交通部只處理填交資料完整之投訴。

在收到投訴的10個工作天內，SAHA交通部將評審投訴，決定是我們的辦公室是否具管轄權。投訴人將收到一封信件，告訴她／他我們的辦公室是否會調查投訴。SAHA交通部有30天的時間調查投訴。如有任何計劃需須延長30天規定者，投訴人將收到一份延長原因之通知書。

如需要更多資料以解決案件，SAHA交通部可聯絡投訴人。投訴人有10個工作天向被指派負責調查案件之調查員提供所需資料。如投訴人未有聯絡調查員或調查員在10個工作天內未有收到額外的資料，SAHA交通部可行政上結束案件。投訴人可以要求延長時間以蒐集並提供額外的資料以作投訴之用，而該請求必須在回復期限內即10個工作天內以書面形式提交。當收到書面請求後，SAHA將給予投訴人從額外10個工作天的時間回復。

如投訴人不想繼續案件，案件亦可在行政上予以結束。在調查員評審投訴後，她／他將發出兩信其中之一給投訴人：結束信或發現信（LOF）。結束信摘要指控和說明此並非一個Title VI的違例，因而案件乃告結束。LOF信摘要指控和有關指控事件之面談，並說明是否有採取任何紀律行動、職員之額外訓練，或其他行動。如投訴人想上訴決定，她／他在收到信件或LOF後有10個工作天可提出。

任何人亦可直接向聯邦運輸管理局投訴，地址如下：FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590。

SAHA 交通部 Title VI 投訴表格

投訴表格

第 I 部份：請清楚填寫		
1. 姓名:		
2. 地址: 如在 SAHA 的住宅大廈內，請包括住宅大廈的名稱:		
3. 電話:		3.a. 第二個電話 (可選擇性):
4. 電子郵件 (如適用):		
5. 是否需要方便格式? 如不, 請在此部份格劃上一條刪除線, 或寫上 N/A 不適用字樣。		<input type="checkbox"/> 大字印本 <input type="checkbox"/> 錄音帶
		<input type="checkbox"/> TDD <input type="checkbox"/> 其他
第 II 部份:		
6. 你是否為自己提出投訴?		是*
*如第 6 題答「是」, 請續填第 III 部份。		
7. 如第 6 題答「否」, 你代提出投訴者是誰? 姓名:		
8. 你和此人的關係是什麼:		
9. 請說明你為什麼為第三者提出投訴:		
10. 請確認你已取得受委屈者之同意代其提出投訴。		是
第 III 部份:		
11. 我相信我所受之歧視, 是基於以下原因(勾選所有適用者):		
<input type="checkbox"/> 種族 <input type="checkbox"/> 顏色 <input type="checkbox"/> 原國籍		
12. 指控歧視之日期: (月月/日日/年年年年)		
13. 請儘量清楚和具體的說明發生什麼, 以及為什麼你認為你被歧視。說明所有涉及之人士。 包括歧視你的人的姓名和聯絡資料 (如知道), 以及任何證人的姓名和聯絡資料。 如需要更多空白填寫, 請附上額外紙張。		
第 IV 部份:		
14. 你以前曾否向 SAHA 交通部提出 Title VI 投訴?		是 否
第 V 部份:		

15. 你有沒有向任何其他聯邦、州或本地部門，或任何聯邦或州法庭？	
[] 是* [] 否	
如答是，請勾選所有適用者：	
[] 聯邦部門_____	[] 州部門_____
[] 聯邦法庭_____	[] 本地部門_____
[] 州法庭_____	
16. 如第 15 題答「是」，請提供提交投訴之政府部門／法庭的聯絡人資料。	
姓名：	
職稱：	
部門：	
地址：	
電話：	電郵：
第 VI 部份：	
投訴之交通部門名稱：	
聯絡人：	
電話：	

你可以附上任何你認為與你投訴有關之任何書面材料或其他資料。

完成表格必須在下面簽名和署上日期：

簽名_____

日期_____

請將此表格親自遞交或郵寄至下址：
 SAHA Transportation, Title VI Coordinator
 1521 University Ave.
 Berkeley, CA 94703

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

SAHA Transportation **has not been involved in** any transportation-related Title VI investigations, lawsuits or complaints.

SAHA Transportation List of Investigations, Lawsuits and Complaints

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

Public Participation Plan

Satellite Affordable Housing Associates (SAHA) is a non-profit 501 c (3) housing and social services organization. Satellite Affordable Housing Associates (SAHA) provides quality affordable homes and services that empower people and strengthen neighborhoods.

SAHA begins from the idea that every person deserves a home. Our work is inspired by a belief that quality homes and empowering services should be in reach for all of the Bay Area's community members and that despite the many obstacles to providing housing for people with low-incomes and special needs, this goal is possible.

SAHA's innovative properties provide more than 3,000 residents in seven counties in northern California with much-needed affordable housing and services. With a commitment to high-quality design and thoughtful, ongoing supportive services, we empower our residents to build better lives and create healthier, safer communities.

SAHA was created out of the strengths of two of the Bay Area's leaders in providing affordable housing for low-income and special needs populations, Satellite Housing and Affordable Housing Associates. We want to advance the field of affordable housing, and guide our work in housing development, property management, and resident services by the following principles:

- We believe that every person deserves a home
- We commit to communities for the long term
- Our comprehensive housing services empower our residents to thrive
- High quality design inspires people and builds community
- Green building practices lead to a healthy, sustainable society
- Innovation and thoughtful risk-taking are part of how we pursue excellence
- Financial health and sustainability are essential to the endurance of our mission
- Diversity and inclusion are fundamental to our work that provides treatment, housing, job assistance, case management and other social services for persons with severe and persistent mental illness and co-occurring disorders.

SAHA Transportation provides wheelchair-accessible van service between many of SAHA's residential communities and destinations in the community. Residents sign up for and receive transportation to shopping, medical appointments and recreational trips. SAHA Transportation does not serve the general public but rather a limited population of residents of affordable, primarily senior housing. SAHA partners with other such agencies in the community to increase access to services needed and fosters aging in place for seniors and people with disabilities. Approximately 83% of residents in our buildings served by SAHA Transportation live below the federal poverty level (FPL), and 91% live at 133% FPL or less. Nearly 70% of residents in buildings served by SAHA Transportation are dually eligible for Medicare and MediCal.

The program provides transportation during regular business hours only, with 4 to 16 scheduled hours per week per housing site.

Given the limited scope of SAHA Transportation, the scope and provision of transportation service impacts exclusively the populations of SAHA buildings rather than the general public. SAHA has individual, professional relationships with every one of its potential riders and maintains various systems to gather stakeholder input regarding agency services, conducting public relations and outreach activities for public engagement as outlined below.

Purposes of this Plan

Public participation is the process through which stakeholders can partake directly in agency decision-making, and express their concerns, desires, and values. We have resident and low-income representation on our Board of Directors, and solicit input from stakeholders and residents annually or more frequently through a resident survey. We utilize this feedback to support our residents without creating disproportionately high and adverse human health or environmental effects on minority and/or low-income populations.

Summary of Outreach Efforts

The following is a summary of outreach efforts conducted by SAHA Transportation as related to Title VI requirements under the Public Participation Plan.

This is not meant to be an exhaustive list but rather highlights a few of the agency's outreach efforts as they relate specifically to minority and low-income populations.

Service Coordination Staffing

SAHA employs approximately 30 in-house staff and 10 contract staff as service coordinators in its buildings under the Department of Resident Services. These service coordinators provide general case management and referral services to all residents; educate company staff and residents on service availability, application procedure, client rights, etc., and refer tenants who need assistance to community resources. Coordinating with SAHA Transportation is part of the service coordinator's responsibilities to secure social services for SAHA residents and to create regular activity programming such as social hours, arts & crafts, wellness, community based activities with an intergenerational focus and other related activities and events.

The service coordinator meets with new residents and educates them about transportation options that are available, and explains to them the SAHA Transportation policies. Periodically, the service coordinator does verbal and written surveys and collects feedback at Town Hall (Community) Meetings to determine what are the most appropriate destinations for each community. They also publicize SAHA Transportation through postings of calendars of all trips,

sign-up sheets, flyers and newsletters, translated to other languages as needed within each building.

Translation of publications, meetings and materials

SAHA's resident services department has 12 fluent Cantonese speakers, four fluent Spanish speakers, and three Vietnamese speakers on staff to assist residents with understanding and communicating in their maternal language. We additionally have volunteers who provide translation in Russian, Cantonese and Farsi as needed, and utilize Language Link over-the-phone translation services to meet with residents speaking other less-common languages.

Working with the entire family as client

When appropriate and only at request of the resident, SAHA service coordinators frequently work together with the entire family in order to collaboratively address barriers to aging in place. In cases with LEP clients who have bilingual family members, this often results in translation to languages in which SAHA cannot have in-house language competency.

Paratransit, special local transportation providers

SAHA coordinates education and training for commuters with disabilities by accessing the services of East Bay Paratransit, Easy Does It Disability Assistance, the South Berkeley Senior Center and other transportation providers when appropriate. We also assist residents upon intake and upon request to enroll in programs for taxi vouchers and reduced or free public transportation.

Annual Satisfaction Surveys

SAHA Transportation conducts Annual Satisfaction Surveys with program participants and stakeholders of the agency to determine level of satisfaction and gain input regarding unmet needs.

SAHA Website

Currently, SAHA Transportation posts notices and announcements on the agency's website. Additional public input can be obtained by the Title VI Complaint Form, which is now available in English, Chinese and Spanish.

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

Four Factor Analysis

Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by SAHA Transportation

SAHA Transportation 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 senior SAHA residents and SAHA residents with disabilities where current public transit options are insufficient or do not exist. Eligible program participants or "riders" must be referred into the program as per agency admissions policy (must be a SAHA resident, or caretaker of a SAHA resident, and sign the Transportation policies) and does not discriminate based on race, color, or national origin based per Title VI guidelines. In addition to Title VI protections, SAHA does not discriminate based on religion, sex, sexual orientation, age, or any other characteristic protected by law. This is standard across all programs.

SAHA Transportation does not offer transportation to the general public other than in situations involving a coordinated care plan with other partnering entities. Therefore, an analysis of public demographic data in Alameda and Contra Costa County does not represent actual populations served by this program.

Instead, SAHA maintains actual data on the ethnicities of residents served through its social services database.

While as explained above, an analysis of public demographic data in Alameda and Contra Costa Counties does not represent actual populations served by this program it is offered below for informational purposes only:

American Community Survey

The U.S. Census Bureau 2008-2012 American Community Survey (ACS) Language Spoken at Home by the Ability to Speak English estimates that of the 1,416,951 Alameda County residents, 236,796 speak Spanish at home (or 16.7%) and 122,828 speak Chinese (8.6%). Vietnamese is spoken by 1.8% of residents and Farsi/Persian by 1.0%. Russian is spoken by less than 1% of Alameda County residents.

In Contra Costa County, English only is spoken at home by 659,098 of more than 985,200 million residents, or 66.9 percent. 17.6 percent speak Spanish, 1.24 percent speaks Chinese, 0.6 percent speak Farsi/Persian, 0.46 percent speak Vietnamese, and 0.26 percent speak Russian.

Subject	Alameda County, California		
	Total	Percent of specified language speakers	
		Speak English "very well"	Speak English less than "very well"
	Estimate	Estimate	Estimate
Population 5 years and over	1,416,951	81.1%	18.9%
Speak only English	57.2%	(X)	(X)
Speak a language other than English	42.8%	56.0%	44.0%
Spanish or Spanish Creole	16.7%	52.9%	47.1%
Other Indo-European languages	7.1%	73.5%	26.5%
Asian and Pacific Island languages	18.0%	51.5%	48.5%
Other languages	1.1%	63.7%	36.3%
SPEAK A LANGUAGE OTHER THAN ENGLISH			
Spanish or Spanish Creole	236,796	52.9%	47.1%
Other Indo-European languages	100,728	73.5%	26.5%
Asian and Pacific Island languages	254,484	51.5%	48.5%
Other languages	15,149	63.7%	36.3%

Subject	Contra Costa County, California		
	Total	Percent of specified language speakers	
		Speak English "very well"	Speak English less than "very well"
	Estimate	Estimate	Estimate
Population 5 years and over	985,200	86.4%	13.6%
Speak only English	66.9%	(X)	(X)
Speak a language other than English	33.1%	58.9%	41.1%
Spanish or	17.6%	54.3%	45.7%

Subject	Contra Costa County, California		
	Total	Percent of specified language speakers	
		Speak English "very well"	Speak English less than "very well"
	Estimate	Estimate	Estimate
Spanish Creole			
Other Indo-European languages	5.5%	70.9%	29.1%
Asian and Pacific Island languages	9.1%	58.8%	41.2%
Other languages	0.9%	74.5%	25.5%
SPEAK A LANGUAGE OTHER THAN ENGLISH			
Spanish or Spanish Creole	173,303	54.3%	45.7%
Other Indo-European languages	54,294	70.9%	29.1%
Asian and Pacific Island languages	89,644	58.8%	41.2%
Other languages	9,074	74.5%	25.5%

A true sampling from 2013 and present year of LEP Persons Served by SAHA Transportation reflects the following:

SAHA collects extensive data about the residents of all sites served by SAHA Transportation. There were 1,988 residents at these buildings and SAHA had complete language data on 1,895 residents. Residents reported the following to staff as of October 2014:

Chinese (all languages and dialects): 1053 residents, 53.0 percent
 English (including as a second language): 1039 residents, 52.3 percent
 Farsi/Persian: 79 residents, 3.9 percent
 Japanese: 13 residents, 0.6 percent
 Korean: 27 residents, 1.4 percent
 Russian: 79 residents, 4.0 percent
 Spanish: 78 residents, 3.9 percent
 Vietnamese: 27 residents, 1.4 percent

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

As indicated above, historically, our Resident Services program is built around daily and constant contact with LEP consumers, as evidenced by our multi-lingual staff and publicity materials, and constant use of translation services (Language Link). Translation services are available to be provided by agency staff as appropriate and when requested by LEP persons free of charge to the resident.

Client surveys, team meetings, case planning conferences and other events provide an opportunity for input and suggested services. Materials are provided in multiple languages and translation services are provided by agency staff as appropriate and, at times, by staff during town hall meetings.

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

The primary purpose of SAHA Transportation program is to empower individuals with specialized transportation needs to access shopping, medical appointments, and entertainment opportunities with the goal of aging in place.

We offer programs and services focusing on each person's strengths to develop the skills and abilities which break the cycle of institutionalization and homelessness. Among low-income seniors, transportation provides critical access to medical providers and lifeline services, food access, and socialization activities. Transportation thus provides an enormous benefit to the quality of resident life at the buildings it serves, increases independence, and addresses conditions of isolation which create mental and physical health risks for seniors.

SAHA Transportation is available to clients for as long as they continue living in SAHA housing. A preliminary study of SAHA residents indicates the success of our program in clients aging in place:

- The average length of stay in SAHA senior housing is more than 12 years
- SAHA Seniors remain in the community an average of 3.4 years longer than the national average. The average age of moving to assisted living or nursing care is 87.6 years old among SAHA Seniors, while the national average is 84.2.
- The life expectancy of SAHA senior residents is 10 years longer than the life expectancy for all Americans of similar incomes

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

SAHA Transportation specifically employs a multilingual staff for purposes of reaching our resident population better, and we have drivers fluent in Cantonese, Mandarin, Vietnamese and Spanish. Numerous SAHA Service coordinators working at housing sites are additionally fluent in Cantonese, Mandarin, Vietnamese and Spanish, and we also have volunteers that assist us with translating to Russian, Cantonese, Mandarin and Farsi. Each SAHA building's budget and

SAHA Transportation's operating budget have specific line items for providing language access and LEP outreach, which primarily purchases the service of Language Link over-the-phone translation in any language, and written translations of larger documents from contractors. The budget for this translation at all sites is \$26,560 in 2014-15.

SUMMARY

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

- By staffing our transportation and service coordination components with numerous multi-lingual staff, SAHA provides substantial direct communication to our primary language groups that are served by the program.
- SAHA additionally purchases services from contractors and Language Link and receives donated translation services from volunteers and family members in order to achieve language access for all LEP groups.
- More than 50 percent of our program's recipients are LEP persons, and we serve LEP persons daily.
- No consumers were underserved or exited the program due to language barriers.
- SAHA as an organization has budgeted \$26,560 at all sites for the purchase of contract translation services, and this amount is greatly exceeded by the value of time spent by multi-lingual staff on translation and outreach to LEP populations.

Language Assistance Implementation Plan

Methodologies

Identifying LEP Individuals

SAHA identifies LEP individuals at sites served by SAHA Transportation through its initial services assessment. We have thorough language skills data for virtually every potential SAHA Transportation client—their preferred language for receiving materials, their language spoken at home, and what languages are spoken by their family members and primary emergency contacts.

Providing Services

As evidenced by the Four Factor Analysis, SAHA has dedicated substantial resources toward serving LEP individuals based on findings from these assessments, and provides these services thousands of times per year. Our services, which are voluntary, are utilized by 98.6 percent of our residents in the last quarter alone, which demonstrates great success by all individuals including LEP individuals in accessing the program. Furthermore, we have no evidence or complaint of any resident who has not accessed services due to language barriers. Our formal grievance procedure is available to all residents and posted at all sites. Should residents wish to complain for a matter regulated by Title VI, we will offer the following written methods in English, Spanish and Chinese:

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

Other documents can be translated to Farsi, Russian and Vietnamese orally upon request. Language groups who are less represented can access these documents through oral interpretation to their language facilitated with our service coordinator, translated through Language Link.

Communicating Availability of Language Assistance

SAHA is fortunate to have a multi-lingual staff that can assist residents with understanding their options and rights. In cases where such a staff member is not available or the resident speaks a less-represented language and there is no corresponding staff language capacity, we communicate with them according to the following strategies. Residents have emergency contact information in their file and our staff maintains contact with family members whenever consent is given by the resident. In such cases, family members can provide helpful facilitation of communication. In situations where this is not practical or available, all SAHA Resident Services staff has a chart that allows new residents to indicate the language they speak and indicates that language assistance is available. By indicating the language they need on the chart, the resident prompts the SAHA staff member to request translation in the correct language through Language Link.

Monitoring

As a developer of high-quality living spaces, SAHA works with its architects and designers to minimize barriers that are created by architectural factors and environmental factors. As a service provider SAHA addresses barriers that exist due to attitudinal factors, financial and employment barriers and communication barriers such as language. SAHA receives input and keeps up to date regarding any barriers related to limited English proficiency and access to services for minority populations by hosting monthly town hall meetings with translation available, having a robust and responsive grievance procedure available to LEP residents, and conducting an annual resident survey to track patterns and deficiencies over time. Further periodic satisfaction surveys and discharge planning and exit information for the program offers opportunity for clients and their care givers to provide input or suggest additional services. The Title VI Plan will also be evaluated and updated as required.

Employee Training

SAHA Transportation conducts a monthly In-Service training for staff that may include engaging LEP and other “hard to reach” consumers, customer service and language assistance training. Working effectively with LEP individuals in the context of community trips is a regular training topic at these meetings.

SAHA encourages staff education in learning to more effectively communicate with individuals served throughout SAHA's Resident Services program. Staff are required to attend monthly In-Service trainings, and are encouraged to attend various external trainings as well.

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, SAHA serves LEP individuals constantly and daily, and customer service to LEP individuals is an organizational value which is expected of all drivers and other direct service staff to help increase fair and equitable access to quality services.

Membership of Non-Elected Committees and Councils

SAHA Transportation does not have a non-elected transit related advisory council at this time.

Title VI Equity Analysis

SAHA Transportation does not have transit related facilities.