

Catholic Charities of the Diocese of Stockton

Title VI Program

And limited English Proficiency Plan

Locations

Main Office
San Joaquin County
1106 N El Dorado Street
Stockton, CA 95202

Stanislaus Office
1506 H Street
Modesto, CA 95354

Mother Lode Office
88 Bradford Street
Sonora, CA 95370

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INTRODUCTION

Title VI of the Civil Rights Act of 1964, a federal statute, provides that no person shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance. In addition, Presidential Executive Order 13166 requires recipients of federal funds to take reasonable steps to address the needs of individuals who have limited-English proficiency in order to ensure no discrimination occurs based upon national origin.

On October 1, 2012, the Federal Transit Administration (FTA) released Circular 4702.1B to comply with the newly revised Department of Transportation (DOT) regulations issued to implement the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, and Executive Order 13166. Catholic Charities of the Diocese of Stockton Transit Services' Title VI Program has been written to reflect the requirements of the new circular. This plan and report highlight Catholic Charities' efforts to support and comply with all aspects of Title VI.

Program Objectives

Catholic Charities' Title VI Program goals are:

- Ensuring that the quality of Catholic Charities' Senior Assisted Transportation service is provided in a nondiscriminatory manner;
- Promoting full and fair participation in transportation decision-making without regard to race, color, or national origin;
- Ensuring meaningful access to senior assisted transportation programs and activities by persons with limited-English proficiency

Title VI Public Notice

Catholic Charities does not discriminate against any person with respect to any federally-assisted transit program or service. Catholic Charities provides information regarding its Title VI obligations to the public using a variety of methods. Information, including references to FTA circulars, the Transit Title VI program, and the Title VI complaint procedure, is available on the Catholic Charities web site and at the Modesto and Stockton offices. It is also provided to staff, citizens, and clients. Notice of non-discrimination policy (**Appendix A**) is posted in the agency vehicles and included in materials for program participants and staff and volunteer drivers.

COMPLAINTS

Catholic Charities has a formal complaint process in place. The Title VI Complaint Procedures and Complaint Forms are available in English and in Spanish on the website, at the Modesto and Stockton offices. Copies of these documents are located in **Appendix B**.

Title VI complaints are made to the Main office of Catholic Charities. All individuals making a Title VI complaint shall be notified in writing of the protections and due process procedures available to them as provided by Title VI. All Title VI complaints are recorded in a special Title VI file. Following the filing of a complaint, Catholic Charities will conduct an investigation and ensure that all necessary follow-up actions are conducted. As required by the FTA, the Title VI complaint file includes the date of the complaint, the date(s) of the investigation, summary of the allegation, current status of the investigation, and legal or administrative actions taken as a result of the complaint.

LIST OF TITLE VI COMPLAINTS, INVESTIGATIONS, OR LAWSUITS

Due to the absence of any Title VI complaints, local state or federal agency investigations, or lawsuits during the preceding years, no list is included in this document.

PUBLIC PARTICIPATION

Catholic Charities relies upon Stanislaus Council of Governments' (StanCOG) and San Joaquin Council of Governments' (SJCOG) for ensuring compliance with FTA requirements for a locally developed public participation process to consider public comment before carrying out a major change in transportation service.

Catholic Charities recognizes the importance of participating in a wide variety of public meetings and workshops to share information about transit programs, activities, and services in order to collect information from users of Catholic Charities services and make others aware of the service as an option for future use. We work closely with the Area Agency on Aging (AAA) and Coordinated Transportation Services Agency (CTSA), where staff of both agencies regularly interface with older residents. At these public outreach activities staff receives input regarding transit issues and concerns from disadvantaged citizens, including senior citizens older residents who are limited English speakers.

Information on public outreach meetings is widely disseminated and coordinated to ensure that the public is aware that they can participate in these activities through the use of readily available transit services and that the meetings are ADA accessible.

LANGUAGE ASSISTANCE PLAN (LEP)

Consistent with Title VI, DOT's implementing regulations, and Executive Order 13166, Catholic Charities takes reasonable steps to ensure meaningful access to benefits, services, information, and other important transit activities for individuals who are limited-English proficient (LEP).

To provide meaningful access to Catholic Charities programs and services for persons who have limited English proficiency, a LEP plan was developed (**Appendix D**). This plan is a training tool and guide for transportation staff members on how to recognize a person who may need language assistance and how to provide that assistance.

Local demographic data revealed a need to provide language assistance in the Spanish-speaking community. Although Catholic Charities Senior Assisted Transportation Program uses very few printed client materials, under Catholic Charities' LEP program, we plan to provide bi-lingual English/Spanish editions of information materials that are designed to assist clients.

Catholic Charities operations have staff members who are bi-lingual and are trained to assist persons with limited English language proficiency. In recognition of the level of support needed, Catholic Charities' operations staff is bi-lingual. Staff and volunteers from other programs are also available to assist Spanish, Portuguese, Hindi, Punjabi, and Laotian speaking riders.

COMMITTEE MEMBERSHIP

Title 49 CFR Section 21.5(b)(1)(vii) states that the recipient of a federal transit grant may not, on the grounds of race, color, or national origin, deny a person the opportunity to participate as a member of a planning, advisory, or similar body which is an integral part of a program. Catholic Charities has no advisory body for our transportation program. The agency's board of directors is made of volunteers. Of the 10 board members, two are bilingual in English and Spanish, and one is bilingual in English and Portuguese.

No table of committee member racial breakdown is included in this report as Catholic Charities has no committee that pertains to transportation services.

SUBRECIPIENTS

Catholic Charities has no subrecipients.

CONSTRUCTED FACILITIES

Catholic Charities has no constructed facilities.

STANDARDS AND POLICIES

In addition to the above general reporting requirements, FTA Circular 4702.1B requires providers of fixed route public transportation to submit additional information specific to fixed route service. Since Catholic Charities does **NOT** operate fixed route vehicles in peak service, it is subject only to the requirements for system-wide standards and policies.

Title 40 CFR Section 21.5(b)(2) specifies that a recipient shall not utilize criteria or methods of administration which have the effect of subjecting persons to discrimination because of their race, color, or national origin. In addition, Appendix C to Title 49 CFR part 21 establishes that "no person or group of persons shall be discriminated against with regard to routing, scheduling, or quality of service on the basis of race, color, or national origin. Frequency of service, age and quality of vehicles assigned to routes, quality of stations serving different routes, and locations of routes may not be determined on the basis of race, color, or national origin."

On-Time Performance Standard

Catholic Charities attempts to fulfill all requests for rides and to deliver the rides within 30 minutes of their scheduled times.

Vehicle Assignment Policy

The assignment of drivers and clients are based on the location of the client's starting point and client need (wheel chair accessibility). We specifically recruit volunteer drivers who live in various locations throughout the count so we can maximize program efficiencies by matching drivers and clients based in locations throughout the county.

APPENDICES

APPENDIX A

Catholic Charities' Non-Discrimination Statement

Catholic Charities is committed to a policy of non-discrimination in program services pursuant to the requirements of Title VI of the Civil Rights Act of 1964. Any person who believes that he or she has been subjected to discrimination under Title VI on the basis of race, color or national origin may file a complaint with Catholic Charities. To receive additional information on Catholic Charities' non-discrimination obligations, or to file a complaint, please call the Catholic Charities Main office at 209-444-5945 or write to: Catholic Charities, Attn: Executive Director, 1106 N El Dorado Street, Stockton, CA 95202.

Caridades Católicas se compromete a una norma de no discriminación en sus programas de servicio de acuerdo a los requisitos del Artículo VI del Acto Derechos Civiles de 1964. Cualquier persona que crea que ha sido discriminada bajo el Artículo VI basado en raza, color, u origen nacional puede asentar una demanda con Caridades Católicas. Para recibir más información acerca de las obligaciones de no discriminación de Caridades Católicas o para archivar una demanda, favor de llamar al 209-444-5945 o escriba a: Caridades Católicas, Directora Ejecutiva, 1106 N El Dorado Street, Stockton, CA 95202.

APPENDIX B

Complaint Procedures & Forms

Catholic Charities Civil Rights Complaint Procedure

Catholic Charities operates its transportation services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes he or she has been aggrieved by an unlawful discriminatory practice under Title VI may file a complaint with Catholic Charities. Any such complaint must be in writing and filed with the Catholic Charities within 180 days following the date of the alleged discriminatory occurrence.

Catholic Charities Title VI Complaint forms are available at the Catholic Charities office located at 1106 N El Dorado Street, Stockton, CA 95202 and online at www.ccstockton.org. Completed forms should be mailed to:

Catholic Charities
Attn: Executive Director
1106 N El Dorado Street
Stockton, CA 95202

Verbal complaints will be accepted and transcribed for any complainant unable to complete the form. Verbal complaints may be filed in person at 1106 N El Dorado Street, Stockton CA 95202 or by phone at 209-444-5945.

A complainant may file a complaint directly with the United States Department of Transportation and/or the California Department of Transportation. If a complaint is filed with the Catholic Charities and an external entity simultaneously, the external complaint may supersede the complaint to Catholic Charities and the internal complaint procedures will be suspended pending the external entity's findings.

Within 15 business days of receipt of a formal complaint, the Title VI Program Coordinator will send the complainant an acknowledgement letter and begin an investigation (unless the complaint is filed with an external entity first or simultaneously). The investigation will address complaints filed against transit service offered by the Catholic Charities and will include discussion(s) of the complaint with all affected parties. Catholic Charities will provide appropriate assistance to complainants who have difficulty with disabilities, or who are limited in their ability to communicate in English. Failure of the complainant to provide requested information within 15 business days of the date of Catholic Charities' information request letter may result in the administrative closure of the complaint. The complainant may be represented by a representative of his or her choosing and may bring witnesses and present testimony and evidence in the course of the investigation. The investigation will be conducted and completed

within 60 days of the receipt of the formal complaint. Catholic Charities will send a letter to the address provided by the complainant stating the final decision of the Chief Executive Officer by the end of the 60-day time limit. The complainant shall be notified of his/her right to appeal the decision. Appeals may be made to the California and/or United States department of transportation.

For more information on how to file a complaint, contact the Title VI Coordinator by any of the following methods:

By Phone: (209) 444-5945

By Mail: Catholic Charities, 1106 N El Dorado Street, Stockton CA 95202

E-mail: marevalos@ccstockton.org

Website: www.ccstockton.org

Título VI Procedimientos Para Quejas

El Programa de Transportación de Caridades Católicas opera sus programas sin distinción de raza, color, religión, género, orientación sexual, origen nacional, estado civil, edad o discapacidad de conformidad con el título VI de la ley de derechos civiles, o de otras leyes aplicables. Para más información:

Llame a Teléfono: (209) 444-5945
O Escriba a: Caridades Católicas
1106 N El Dorado Street
Stockton, CA 95202

O envíe un Correo electrónico: marevalos@ccstockton.org

Caridades Católicas Declaración de política de tránsito

Título VI de la ley de derechos civiles de 1964 declara que:

Ninguna persona en los Estados Unidos, por motivos de raza, color u origen nacional, se excluirá de la participación en, ser negado los beneficios de o ser objeto de discriminación bajo ningún programa o actividad que reciba asistencia financiera Federal.

Caridades Católicas se compromete a cumplir con los requisitos del Título VI en todas sus actividades y programas financiados por el Gobierno Federal.

Haciendo una Queja bajo la ley de Título VI

Cualquier persona que cree que él o ella ha sido perjudicada por una práctica discriminatoria ilegal bajo el título VI puede presentar una queja con la ciudad. Cualquier queja debe ser por escrito y presentada con la ciudad dentro de los 180 días siguientes a la fecha de la supuesta ocurrencia discriminatoria. Para obtener información sobre cómo presentar una queja, comuníquese con la Sección de Tránsito de la Ciudad de Modesto por cualquiera de los siguientes métodos:

Correo: Caridades Católicas
1106 N El Dorado Street
Stockton, CA 95202

Teléfono: (209) 444-5945
FAX: (209) 444-5933
Correo electrónico: marevalos@ccstockton.org
Página Web: www.ccstockton.org

**Title VI Complaint Form
Catholic Charities of the Diocese of Stockton
Office of Compliance**

Catholic Charities is committed to ensuring that no person is excluded from participation in or denied the benefits of its services on the basis of race, color, or national origin, pursuant to Title VI of the Civil Rights Act of 1964, as amended. Title VI complaints must be filed within 180 days from the date of the alleged discrimination.

The following information is necessary to assist us in processing your complaint. If you require any assistance in completing this form, please contact Yolanda Ochoa, HR, by calling (209) 444-5900. The completed form must be returned to Catholic Charities, Title VI Coordinator, 1106 N El Dorado Street, Stockton, CA 95202.

Your Name:	Phone:
Street Address:	Other Phone:
	City, State, Zip:
Person(s) Discriminated against (if someone other than complainant): Name(s):	
Street Address. City, State. And Zip Code:	

Which of the following best describes the reason for the alleged discrimination: (Check one)

- | | |
|--|-------------------------|
| <input type="checkbox"/> Race | Date of Incident: _____ |
| <input type="checkbox"/> Color | |
| <input type="checkbox"/> National Origin | Time of Incident: _____ |

Please describe the alleged discrimination incident. Provide the names and titles of all persons involved. Explain what happened, whom you believe was responsible, and other specific relevant information. Please use the next page of this form if additional space is required.

(Complete next page of form)

Title VI Complaint Form
Catholic Charities of the Diocese of Stockton
Office of Compliance

Please describe the alleged discrimination incident (continued)

Have you filed a complaint with any other federal, state, or local agencies? (check one)

YES NO

If so. List agency / agencies and contact info below:

Agency: _____ Contact Name: _____
Street Address, City, State & Zip Phone:

Agency: _____ Contact Name: _____
Street Address, City, State & Zip Phone:

I affirm that I have read the above charge and it is true to the best of my knowledge.

Complainant Signature

Date:

Print or Type Name of Complainant

Date Received: _____

Received By: _____

Formulario de Quejas Titulo VI
Caridades Católicas Servicio de Transito
Oficina de Cumplimiento

Caridades Católicas centra sus esfuerzos en garantizar que nadie sea excluido de la participación de sus servicios ni que se nieguen los beneficios de estos, en base de raza, color, origen nacional, edad , sexo, y discapacidad en conformidad con las disposiciones del Título VI de la Ley de Derechos Civiles de 1964.

Las quejas bajo el Titulo VI deben presentarse en el transcurso de 180 días a partir de que ocurre la discriminación supuesta.

La siguiente información es necesaria para ayudarnos en el procesamiento de su queja. Si requiere ayuda para llenar este formulario, le agradecemos que se dirija a Yolanda Ochoa, HR, al teléfono (209)444-5900. El formulario completo deberá devolverse a Caridades Católicas, 1106 N El Dorado Street, Stockton CA 95202.

Su nombre:	Teléfono
Dirección:	Segundo Teléfono
	Ciudad, Estado, y Código Postal
Persona(s) que sufrieron discriminación (si es otra que el afirmante): Nombre(s):	
Dirección, Ciudad, Estado, y Código Postal	

¿Cuál de los siguientes describe mejor la razón de la supuesta discriminación? (Marque uno)

- RAZA
- COLOR
- ORIGEN NACIONAL

Fecha del incidente: _____

Hora del incidente: _____

Por favor, describa el supuesto incidente de discriminación. Proporcione los nombres y títulos de todos los involucrados, si usted cuenta con la información. Explique lo sucedido: quien considera que fue responsable; y otra información específica pertinente. Por favor, use el reverso de este formulario si requiere espacio adicional.

Formulario de Quejas Titulo VI
Caridades Católicas Servicio de Transito
Oficina de Cumplimiento

Por favor, describa el supuesto incidente de discriminación (Continuación)

¿Ha presentado alguna queja ante otra agencia federal, estatal o local con respecto a este incidente?

(Marque Uno)

Sí No

Si la respuesta es afirmativa, por favor, a continuación, enumere la agencia o agencias y la información de contacto:

Agencia: _____ Nombre de contacto: _____
Dirección, Ciudad, Estado y Código Postal: _____ Teléfono _____

Agencia: _____ Nombre de contacto: _____

Confirmo que he leído el cargo que se indica arriba y que es verdadero hasta donde tengo conocimiento.

Firma del reclamante

Fecha:

Firme o escriba en letra de imprenta el nombre del declarante

Fecha de recepción: _____

Recibido por: _____

APPENDIX C

Public Participation Plan

Catholic Charities continually strives to inform the community about our many services and programs including our Transportation program via staff outreach, marketing materials and our website (www.ccstockton.org).

Catholic Charities staff disseminates information about the services/ changes at outreach opportunities by attending in-person and virtually during the COVID-19 pandemic. The following represents an example of the outreach opportunities:

- Age with Movement
- Stanislaus County Health Services Agency
- Stanislaus County Community Services Agency
- Healthy Aging Summit
- Senior Awareness Days
- International Rescue Committee (IRC)
- Senior Congregate Meal Sites throughout Stanislaus County
- Senior Information Day, City of Oakdale

Recurring Outreach Efforts

Catholic Charities benefits from additional outreach when the Executive Director and staff attend regularly scheduled meetings to promote the benefits of the Catholic Charities programs:

- Commission on Aging
- Senior Coalition of Stanislaus Meetings
- Serving our Seniors (SOS) meetings
- The Social Services Transportation Advisory Council (SSTAC) meetings
- Veteran Advisory Commission (VAC)

APPENDIX D

Limited English Proficiency and Language Assistance Plan

Individuals who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English, can be Limited English Proficient (LEP) and, therefore, are entitled to language assistance under Executive Order 13166 and Title VI of the Civil Rights Act of 1964.

Language for LEP individuals can be a barrier to accessing important benefits or services, understanding and exercising important rights, complying with applicable responsibilities, or understanding other information provided by federally funded programs and activities. As a recipient of FTA funds, Catholic Charities is obligated to reduce language barriers that can preclude meaningful access by LEP persons to transit services.

This plan establishes guidance for Catholic Charities' LEP plan. It is Catholic Charities' policy to provide meaningful access to its programs and services to persons who, as a result of national origin, are limited in English proficiency. This plan is established pursuant to and in accordance with Executive Order 13166 for "Improving Access to Services for Persons with Limited English Proficiency."

Catholic Charities is required to take reasonable action to ensure LEP people who are otherwise eligible for assisted transportation services, have meaningful access to our services. In order to determine the appropriate mix of LEP services to offer, Catholic Charities performed an analysis of the following four factors:

1. The number of or proportion of LEP Persons served or encountered in the Catholic Charities service population:

Catholic Charities relied upon the 2020 census data, table C16001.

Census data identifies two major language groups in Stanislaus County as English and Spanish, with approximately 57.2% of the population identified as English speaking only, and 33.9% identified as speaking Spanish only. All other LEPs combined equal approximately 9% of the population, with Asian and Pacific Island languages totaling approximately .9%.

Census data identifies two major language groups in San Joaquin County as English and Spanish, with approximately 56.6% of the population identified as English speaking only, and 27.9% identified as speaking Spanish only. All other LEPs combined equal approximately 15.4% of the population, with Asian and Pacific Island languages totaling approximately 4%.

Given these demographics the most likely language need at Catholic Charities' would be English and Spanish.

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2. The frequency with which LEP individuals come in contact with the program:

Catholic Charities serves LEP persons weekly with door through door transportation services. We estimate contact with 2-4 people per week including for reservations that are made in Spanish only conversations.

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

Catholic Charities provides important transportation services to the elderly through its door through door transportation services. Catholic Charities is a primary resource for individuals who are age 60 and older and for a variety of reasons are unable to rely on public transit services to complete daily life tasks such as attending medical appointments and shopping.

4. The resources available to the recipients and costs:

Catholic Charities currently provides information in Spanish, including information brochures. We have bilingual staff providing verbal assistance to LEP individuals who may also have limited reading skills in their native language.

Language Assistance Plan

Catholic Charities is committed to making its services and programs available to LEP persons and recognizes the need to continue providing language services in Stanislaus County. Catholic Charities is committed to continuing the following practices:

- Providing staff members who are bi-lingual and are trained to assist persons with limited English language proficiency
- Providing bi-lingual drivers to assist Spanish speaking riders
- In addition, Catholic Charities will work with community organizations to determine other areas of need and coordinate with other agencies to reach any additional LEP populations.

1. Results of the Four Factor Analysis and Description of LEP Population(s) Served

[FTA C4702.1B, Chapter III-7]

Factor 1: Numbers of LEPs eligible to be served [FTA C4702.1B, Chapter III-7]

The service area for Catholic Charities Assisted Transportation includes the entire county Stanislaus, in the central valley of California.

Most current census data estimates the total service area population to be 551,275 people. The assisted transportation program serves only those residents who are at least 60 years old and who have a physical or mental disability which limits their ability to access public transit options. It is estimated that there are 73,871 residents over age 59. Past studies suggest approximately 15% of older residents have one or more disabilities, (12,834). The American Community Survey does not include detailed information regarding the number of limited English speakers age 60 and older specific to Stanislaus County. Overall, it is estimated that Hispanics comprise 49.5% of the county population. While it is suggested that the percentage is actually slightly lower for older residents, we conservatively estimate the older Hispanic

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population at 5,378, (41% of 12,834). If half of them are limited English speakers/readers, we would be dealing with a potential of 2,644 persons who would need assistance reading or interpreting information in English.

Outreach to LEPs is provided throughout the county and in areas where concentrations can be found to reside. Faith based communities and Spanish language radio are used as common means of reaching this population with information regarding our services. We also rely heavily on our relationship with the Information and Referral staff at the Area Agency on Aging. They distribute approximately 200 resource guides per month that are printed in Spanish.

Factor 2: Frequency with which LEPs come into contact with your program [FTA C4702.1B, Chapter III-7]

The first contact that callers encounter at Catholic Charities' Modesto office is a bilingual speaker whose native language is Spanish. She is fluent in both English and Spanish and almost always available to assist monolingual Spanish speakers. Two of the three employed drivers are also bilingual speakers as are several volunteer drivers.

Outreach to LEPS suggests that most access the program directly or with assistance from bilingual family members. In most cases they have become aware of our service by referral from the Area Agency on Aging, their doctor's office staff, or from information gathered at community events including those sponsored by their faith community in which we have participated.

Factor 3: The nature and importance of program to LEPs lives [FTA C4702.1B, Chapter III-7]

Catholic Charities Assisted Transportation Program serves a very small subset of the total population. As previously described, our service is treated as a last resort for those who are unable to use public transit and have no other options. The clients we serve have special needs, often described as requiring door-through-door transportation services.

Given the limited funds available to operate Catholic Charities' program, we have always prioritized trip purposes focusing primarily on medical appointments. We recognize the value in providing trips for other purposes such as for grocery shopping, conducting other household errands, and for personal or social purposes. The very nature of our service that relies heavily on volunteer drivers requires advanced scheduling, usually one week in advance. That feature creates a barrier for all riders, regardless of their preferred language, as we have limited ability to respond to impromptu needs.

Based on the address to which clients are delivered, most clients use our service to access medical services. Approximately 8% of our riders are scheduled for multiple recurring appointments, such as those receiving dialysis and other therapy treatments.

Factor 4: Resources available for LEP Outreach and Costs of outreach [FTA C4702.1B, Chapter III-8]

While Catholic Charities resources for encouraging Public Participation are very limited, we have a long history of working with other programs and effectively participating in outreach. For more than 20 years, Catholic Charities has coordinated the Stanislaus Elder Abuse Prevention Alliance (SEAPA) project that conducts multiple events during the year in various communities throughout the county, which offer opportunities to outreach with older residents.

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2. Implementation Plan

Responsibility for Implementation

The Senior Assisted Transportation program is responsible for implementing the policies pertaining to Title VI provisions impacting older Stanislaus and San Joaquin County residents who seek rides from the program. The Program Coordinator will work with the Executive Director.

Language Service Provision [FTA C4702.1B, Chapter III-8]

- Existing staff will be available to meet the communication/translation needs of most LEP callers and visitors. If no employed or volunteer staff is available, we will seek translation services from other local agencies including the United Way of which Catholic Charities is a partner agency.
- Most contact with program participants is conducted orally, both on the telephone and in face to face interactions.
- The Senior Assisted Transportation Program utilizes very few printed materials for program clients. Flyers describing and promoting the service are printed and distributed in both English and Spanish. The general Catholic Charities brochure which includes a brief description of the transportation service is printed in both English and Spanish and is frequently distributed at outreach events/opportunities. Both materials describe the essential features of the service.
- Safe Harbor Provision: written translation not required if LEP population is less than 5% or 1,000 persons of total population. Language assistance still required.

Safe Harbor Provision

The Federal Transit Authority Circular 4702.1B states:

DOT has adopted DOJ's Safe Harbor Provisions 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. "DOT has adopted DOJ's Safe Harbor Provision, which outlines Catholic Charities 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.

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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."

Outreach/Notice of Availability of Language Assistance [FTA C4702.1B, Chapter III-8]

- The website includes basic descriptions and contact information on various Catholic Charities programs and services. A statement referring to Title VI requirements is included on the transportation page on the Catholic Charities website, www.ccstockton.org and copies can be obtained at 1106 N El Dorado Street, Stockton CA 95202.

3. Monitoring, Evaluating and Updating the LAP

[FTA C4702.1B, Chapter III-8]

- The Language Assistance Plan will be reviewed and updated at least every three years.
- We will seek to involve at least one client and one volunteer in the review process.
- We will continue to monitor changes in the LEP population
- We will continue to seek opportunities to outreach and engage with various cultures and ethnic groups whose members may communicate with LEP speakers.

4. Staff Training

[FTA C4702.1B, Chapter III-8]

- Paid and volunteer staff in-service training is conducted at least quarterly. Customer Service and Language Assistance can be included in the training. All drivers and other program staff are encouraged to take part in training opportunities including webinars that address strategies for improving communication skills with clients.

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Catholic Charities Transportation Vital Documents

Document Title	Spanish Version	English/ Spanish Version	Comments
General Program Brochure	Yes		
Service Flyer	Yes		

06/2023

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CATHOLIC CHARITIES CONTACTS

For further information regarding Catholic Charities Title VI Program, please contact the Title VI Program coordinator or the Executive Director at 209-444-5945 or 1106 N El Dorado Street, Stockton, CA 95202.

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Authorizing Resolution

Resolution 2022-23

A RESOLUTION OF THE CATHOLIC CHARITIES DIOCESE OF STOCKTON BOARD OF DIRECTORS AUTHORIZING THE TITLE VI COMPLIANCE PLAN FOR THE AGENCY.

WHEREAS, Catholic Charities of the Diocese of Stockton 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 Requirements 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 Catholic Charities of the Diocese of Stockton as follows:

- The Executive Director is authorized to implement the components of the plan in order to meet federal requirements.
- The Executive Director is authorized to implement policies that may be necessary to comply with subsequent revisions or interpretations of the Civil Rights Act.

PASSED AND ADOPTED by the Board of Directors of Catholic Charities of the Diocese of Stockton, State of California on this __07__ Day of June, 2023.

Mark Croce, Board of Directors Chairman
June ____, 2023