



DATE: June 25, 2014

TO: Honorable Mayor and City Councilmembers

FROM: Neighborhood Services Department

SUBJECT: **RESOLUTION AUTHORIZING THE ADOPTION OF THE TITLE VI COMPLIANCE PLAN FOR THE "SOLUTIONS FOR SENIORS ON THE GO" SENIOR TRANSPORTATION PROGRAM**

SYNOPSIS

Staff recommends that the City Council adopt a resolution authorizing the adoption of the Title VI Compliance Plan for the "Solutions For Seniors on the Go" Senior Transportation Program, and authorizing the Senior Transportation program staff to implement the components of the program and policies that may be necessary to comply with subsequent revisions or interpretations to the Civil Rights Act in order to meet the Federal requirements for funding by the New Freedom Grant Program.

BACKGROUND

The Federal Transit Administration (FTA) Section 5317 New Freedom (NF) Program is authorized under the provisions set forth in SAFETEA-LU, of which provisions authorize the U.S. Secretary of Transportation to apportion funds to each state for grants to these programs. The Governor of California has designated the California Department of Transportation (Caltrans) Division of Mass Transportation as the recipient of all FTA grants for the purpose of administering those funds in accordance to state and federal laws, statues, and regulations.

In February 2013 Caltrans opened a competitive grant opportunity for local agencies that included support for enhancement of same day, door-to-door services, voucher programs, and expansion of volunteer driver programs. The City of Oceanside has been operating such programs for five years for seniors over the age of 65 years that cannot access other modes of publicly available transportation.

The City of Oceanside's "Solutions For Seniors on the Go" Transportation Program applied for funding through the Section 5317 New Freedom (NF) Program and was awarded \$116,308 in funds for program year 2014-15.

A requirement for executing the Standard Agreement to begin program service delivery is the development and adoption of a Title VI Compliance Plan (Attachment I). The purpose of the document is to comply with Title VI of the Civil Rights Act of 1964, including new provisions detailed in the U.S. Department of Transportation's Federal Transportation Administration (FTA) Circular 4702.1B, "Title VI Requirements and Guidelines for Federal Transportation Administration Recipients". (Attachment II). This Plan serves as a procedural guide and a framework for assessment of the population status and determines an appropriate Public Participation Plan to promote inclusive public participation in the "Solutions For Seniors on the Go" Transportation Program.

ANALYSIS

"Solutions for Seniors on the Go" is the City of Oceanside's transportation program for senior residents. The program provides transportation to needed medical appointments, the pharmacy, and the grocery store for 1,200 senior residents that are registered in the program. Many seniors report that without the rides, they would have to cancel their appointments. Grant funds are vital to the sustainability of Oceanside senior transportation services which include shuttle, taxi scrip, and volunteer driver service.

The NF Program funds are available to local government organizations that support new public transportation services beyond those required by the Americans with Disabilities Act of 1990 (ADA). The definition of "new service" is any service or activity that was not implemented or operational before August 10, 2005. Services beyond those required by ADA include services to seniors who are not ADA eligible, yet still cannot access other publicly available services.

As sub-recipients of a federally funded program, the City of Oceanside must carry out U.S. Department of Transportation (DOT) Title VI regulations and integrate into the existing programs, considerations expressed in the DOT's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons.

Staff conducted a Four Factor Analysis to determine:

1. The number or proportion of Limited English Proficiency (LEP) persons eligible to be served or likely to be encountered by the program;
2. The frequency with which LEP persons come into contact with the program;
3. The nature and importance of the service provided by the program to these people's lives; and
4. The resources available to the recipient for LEP outreach.

Based on the findings of the Four Factor Analysis, the Title VI Compliance Plan was developed to include practices for ensuring the "Solutions For Seniors on the Go" Transportation Program can provide language assistance to LEP persons and serve those who are non-English speaking.

FISCAL IMPACT

The California Department of Transportation (Caltrans) Division of Mass Transportation's New Freedom Grant Program has committed \$116,308 in program funds for Fiscal Year 2014-15, (BU 817136800273.4376). An adopted Title VI Compliance Plan is required in order to fully execute the Standard Agreement and begin program delivery. These funds are required to maintain the current level of service to Oceanside Seniors.

COMMISSION OR COMMITTEE REPORT

Does not apply

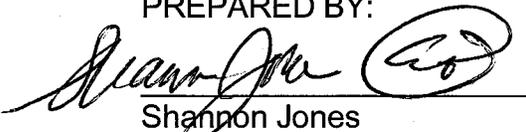
CITY ATTORNEY'S ANALYSIS

The referenced documents have been reviewed by the City Attorney and approved as to form.

RECOMMENDATION

Staff recommends that the City Council adopt a resolution authorizing the adoption of the Title VI Compliance Plan for the "Solutions For Seniors on the Go" Senior Transportation Program, and authorizing the Senior Transportation program staff to implement the components of the program and policies that may be necessary to comply with subsequent revisions or interpretations to the Civil Rights Act in order to meet the Federal requirements for funding by the New Freedom Grant Program.

PREPARED BY:



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SUBMITTED BY:



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REVIEWED BY:

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Attachments: Title VI Compliance Plan
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Purpose

TITLE VI OF THE CIVIL RIGHTS ACT OF 1964, 42 U.S.C LIMITED ENGLISH PROFICIENCY (LEP)

This document was prepared by The Neighborhood Services Department of the City of Oceanside and approved by the Oceanside City Council to comply with Title VI of the Civil Rights Act of 1964, including new provisions detailed in the U.S. Department of Transportation's FTA Circular 4702.1B, "Title VI Requirements and Guidelines for Federal Transit Administration Recipients". This procedural guide provides a framework for assessment of the population status and determining an appropriate Public Participation Plan to promote inclusive public participation in the "Solutions For Senior's on the Go" Senior Transportation Program .

Notice to the Public

Notifying the Public of Rights Under Title VI

The City of Oceanside



The City of Oceanside is committed to ensuring that no person shall be excluded from the equal distribution of its services and amenities because of race, color, or national origin in accordance with Title VI of the Civil Rights Act of 1964.

- “Solutions for Senior on the Go” provides services and operates its programs without regard to race, color, or national origin in full compliance with Title VI.
- Any person who believes he or she has been aggrieved by any unlawful discriminatory practice under Title VI while participating in the “Solutions For Seniors on the Go” may file a complaint. All complaints will be fairly and objectively reviewed and investigated.
- For information about the “Solutions For Seniors on the Go” Title VI complaint process, contact 760-435-5253 or visit <http://www.ci.oceanside.ca.us/gov/ns/parks/senior/transit.asp>
- To file a complaint by phone, contact **760-435-5253**
- To file a complaint by email, email recadmin@ci.oceanside.ca.us
- To file a complaint by mail, mail complaint form to:
City of Oceanside, Neighborhood Services
C/o “Solutions For Seniors on the Go” Program
300 North Coast Highway
Oceanside, CA 92054
- A complaint may also be filed directly with the Federal Transit Administration by filing directly with the Title VI Programs Coordinator, FTA Office of Civil Rights, East Building, 5th Floor – TCR, 1200 New Jersey Avenue, S.E., Washington, D.C. 20590.

Si se necessita informacion en espanol, llame [760-435-5041](tel:760-435-5041)

If information is required in another language, contact Language Link [888 338 7394](tel:888-338-7394)

Posted Locations

Location	Address	City
Oceanside Senior Center	455 Country Club Lane	Oceanside
El Corazon Senior Center	3302 Senior Center Drive	Oceanside
Neighborhood Services- Housing Offices	321 North Nevada Street	Oceanside
Neighborhood Services – Parks and Recreation Offices	300 North Coast Highway	Oceanside
City of Oceanside – City Hall	300 North Coast Highway	Oceanside

The “Solutions For Senior on the Go” Title VI Plan information is also provided on the City of Oceanside’s website at <http://www.ci.oceanside.ca.us/gov/ns/parks/senior/transit.asp>

This information can also be accessed directly through the City of Oceanside’s Parks and Recreation website at www.oceansiderec.com by selecting Senior Services, Transportation Services.

City of Oceanside, "Solutions for Seniors on the Go" Complaint Form, Page 2

Section IV:		
Have you previously filed a Title VI complaint with the City of Oceanside?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Section V:		
Have you filed this complaint with any other Federal, State, or local agency, or with and Federal or State Court?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
If "Yes", please check all that apply and supply the contact information for the agency/court where the complaint was filed:	<input type="checkbox"/> federal Agency	<input type="checkbox"/> State Agency
	<input type="checkbox"/> Local Agency	
	<input type="checkbox"/> Federal Court	<input type="checkbox"/> Local Court
Name:		
Title:		
Agency:		
Address:		
Telephone:		Email:
Section VI:		
Name of agency complaint is against:		
Please indicate program (if applicable):		
<input type="checkbox"/> Volunteer Driver <input type="checkbox"/> Shuttle/Van Service <input type="checkbox"/> Taxi Voucher		
Agency Contact Person:		
Telephone:		

Please include additional written material or other information that you believe is relevant to your complaint.

Signature and date are **REQUIRED** below to complete form:

Signature _____

Date: _____

Please submit this form in person or by mail to:

Parks and Recreation
Attn: "Solutions For Seniors on the Go" Transportation Manger
300 North Coast Highway
Oceanside, CA 92054

Complaint Procedures

Title VI Complaint Process

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by the "Solutions For Seniors on the Go" Program may file a Title VI complaint by completing and submitting the Complaint Form. "Solutions For Seniors on the Go" investigates complaints received no more than 180 days after the alleged incident. Only complete complaints will be processed.

The following procedures will be followed to investigate a formal Title VI complaint:

- Within 10 business days of receiving the complaint, the "Solutions For Seniors on the Go" Program Coordinator will determine if the "Solutions For Seniors on the Go" has jurisdiction. The complainant will receive a letter stating whether the complaint will be investigated by the "Solutions For Seniors on the Go" program staff.
- The investigation will be conducted and completed within 30 days of the receipt of the formal complaint.
- If additional information is needed, "Solutions For Senior's on the Go" Program Coordinator may contact the complainant. The complainant has 10 business days from the date additional information was requested to reply with the requested information. If the Program Coordinator is not contacted within this 10 day period, "Solutions For Seniors on the Go" can administratively close the case.
- The complainant will be notified in writing as to any delay or extension in the 30-day rule.
- A case can be administratively closed if the complainant no longer wished to pursue the case.
- Following the investigation, the "Solutions For Senior's on the Go" Coordinator will issue one of two letters to the complainant: (1) Closure Letter or (2) Letter of Finding
 - A Closure Letter summarizes the allegations and states that upon review there was not a Title VI violation and that as such, the case will be closed.
 - A Letter of Finding summarizes the allegations and the interviews regarding the alleged incident and explains whether any disciplinary action, additional staff training of the staff member or other appropriate action will take place.
- If the complainant disagrees with the decision, he/she has 30 days after the date of either the Closure Letter or the Letter of Finding to appeal to the Neighborhood Services Department's Section 504 Coordinator. The complainant is entitled to review the denial and or present additional information and arguments. Upon review of the appeal, the Neighborhood Services Department's Section 504 Coordinator will issue written notification of the decision of this appeal and the reasoning for it within in 30 days of filed appeal. Appeals must be in writing, include the original complaint form and either Closure Letter or Letter of Finding and must be issued to:

Neighborhood Services

Attn: Cecilia Barandiaran, Section 504 Coordinator
300 North Coast Highway
Oceanside, CA 92054

- The complainant may also file a complaint directly with the Federal Transit Administration (FTA):
Title VI Program Coordinator, FTA Office of Civil Rights, East Building, 5th Floor – TCR, 1200
Noew Jersey Avenue, S.E. Washington, D.C. 20590

Transportation Investigations, Complaints, Lawsuits

The “Solutions For Seniors on the Go” Program has not been involved in any transit-related Title VI investigations, complaints or lawsuits.

Public Participation Plan

The “Solutions For Seniors on the Go” program is a small transportation program run through the Parks and Recreation Division of the City of Oceanside’s Neighborhood Services Department. This program does not have a Board of Directors making transit or transportation program decisions on behalf of the program. If transportation related items are scheduled for the Oceanside City Council and discussion or action is taken at these meetings, the City of Oceanside is required to publicly notice the meeting to meet the specific needs of the current demographics.

The “Solution’s For Senior’s on the Go” has collected the following faith-based, commercial and media-related contact list to assist in the noticing of transportation program related matters that would provide notice to LEP of public participation opportunities.

Spanish LEP Persons

Public Participation Noticing Possibilities:

- Local Media (Television, Newspaper and Radio)
- Postings (Commercial and Faith-Based)

Local Media:

Television		
Channel	Name	Contact
Channel 12	Notivisa (XEWT)	Notivisa, Tijuana (ch. 12) Phone: (619) 585-9398 637 3 rd Ave Suite B Fax: (619) 585-9463 Chula Vista, CA 91910 notivisaregional@televisa.com.mx
Channel 15	TV Azteca (AZTECA)	TV Azteca, Tijuana (ch. 15) contacto@tvazteca.com Phone: 01800 727 1919
Channel 17	Univision (KBNTCA)	Univision/Telemundo/Galavision, San Diego (ch. 17/20/64) 5770 Ruffin Road San Diego, CA 92123
Channel 20	Telemundo (XHAS)	
Channel 64	Galavision (GALAP)	Alejandra Molinari - promotions & events Operator/Receptionist (858) 503-6009 (858) 576-1919 amolinari@entravision.com (858) 715-6423

Newspaper	
Publication	Contact
Hispanos Unidos (this may currently only be a digital publication)	PO Box 462016 Escondido, CA. 92046 Phone: (760) 740-9561 Fax: (760) 737-3035
El Latino San Diego	Mail: PO Box 120550 San Diego, CA 92112 Physical: 555 H Street Chula Vista, CA 91910 Phone: (760) 743-3838 Fax: (760) 743-6620
La Prensa San Diego	651 Third Avenue Suite C Chula Vista, CA 91910 Phone: (619) 425-7400 Phone: (619) 231-2873 laprensa@ix.netcom.com

Radio:

All Spanish-language FM radio stations broadcasting to the southern California/northern Baja California region:

- 91.7 XHGLX Exa FM (Tijuana) MVS Radio
- 94.5 XHA La Invasora (Tijuana) Uniradio
- 95.3 XHHIT La Caliente (Tecate) Multimedios Radio
- 97.7 XHTIM La Mejor FM Bien Parada (Tijuana) MVS Radio
- 99.3 XHOCL La Preciosa 99.3FM (Tijuana) Clear Channel
- 102.5 XHUAN Fusion 102.5FM (Tijuana) Imer Instituto Mexicano De La Radio
- 102.9 KLQV Recuerdo 102.9FM (San Diego) Univision
- 104.5 XHLTN Radio Latina (Tijuana) Radio Imagen
- 106.5 KLVN La Nueva 106.5 (San Diego) Univision
- 107.3 XHFG Pulsar FM (Tijuana) Uniradio
- 107.7 XHRST Los 40 Principales (Tijuana) Grupo Radiofonico Internacional

Radio Contacts:

- MVS Radio: email link on web site only
- Uniradio: Jim Smith (619) 497-0600 xt.307
- Multimedios Radio: email link on web site only
- Clear Channel: (210) 822-2828
- Mexican Institute of Radio: email link on web site only
- Univision: (858) 503-6535
- Radio Imagen: 1-866-817-1712
- Grupo Radiofonico Internacional: email link on web site only

Postings:

Intended Locations of Postings:

- Mexican Market Places
- Catholic Churches

Markets/Carnicerias:

Primo Foods
606 Morse street
Oceanside, CA 92054
(760) 439-8711

Autlan Carniceria Y Taqueria
608 Crouch Street
Oceanside, CA 92054
(760) 757-8332

Alfredo's
602 N. Coast Highway
Oceanside, CA 92054
(760) 433-3504

El Torito Meat Market
418 San Diego Street
Oceanside, CA 92058
(760) 433-1312

Rodeos Meat Market
3858 Mission Avenue
Oceanside, CA 92058
(760) 439-1630

Viva Super Mercado
2031 Mission Avenue
Oceanside, CA 92058
(760) 444-0471

Catholic Churches:

Saint Mary, Star of the Sea
609 Pier View Way
Oceanside, CA 92054
(760) 722-1688

Saint Margaret Parish
4300 Oceanside Boulevard
Oceanside, CA 92056
(760) 941-5560

Old Mission San Luis Rey
4050 Mission Avenue
Oceanside, CA 92057
(760) 757-3651

Filipino (Tagalog) LEP Persons

Public Participation Noticing Possibilities:

- Local Media (Newspaper)
- Postings (Commercial and Faith-Based)
- Regional Contacts

Newspaper:

Filipino Press
600 East 8th Street Suite 3
National City, CA 91950

Asian Journal
550 East 8th Street Suite 6
National City, CA 91950
(619) 474-0588
asianjournal@aol.com

Churches:

First Baptist Church of Oceanside
855 Brotherton Road
Oceanside, CA 92054
(760) 739-8969
*Filipino service Sundays @ 10:45
<http://www.1baptist oceanside.org>

Bethel Filipino Mission
240 Grace Street
Escondido, CA
(760) 433-8233

Market Places:

Mission Asian Market
3320 Mission Ave Suite L
Oceanside, CA 92054
(760) 722-8024
Lita's Fish & Oriental Food Market
3864 Mission Ave
Oceanside, CA 92054
(760) 439-9198

Mission Oriental Market
3753 Mission Ave Suite 121
Oceanside, CA 92058
(760) 722-7963

Regional Contacts

Organizations:

Filipino-American Chamber of Commerce of San Diego County

415 Laurel Street PMB#218

San Diego, CA 92101

info@faccsd.com

Council of Philippine American Organizations of San Diego County, Inc.

P.O. Box 1504

National City, CA 91951-1504

(619) 477-4090

Non-Profit Organizations:

Filipino-American Cultural Association of North San Diego County

P.O. Box 6276

Oceanside, CA 92052-6276

Contact through email option on the website

Limited English Proficiency Plan (LEP)

Four Factor Analysis

- 1. Number or proportion of LEP persons eligible to be served or likely to be encountered by the program or grantee.**

Measure:

Five percent or 1,000 persons of total population speaks English less than “very well”

Population	Estimated Population	Percentage
Total Oceanside Population	154,860	100%
Speak only English	101,507	65.5%
Spanish or Spanish Creole:	40,428	26%
Speak English less than “very well”	22,268	14%
Tagalog:	3,256	2.1%
Speak English less than “very well”	1,157	0.75%

2005-2009 American Community Survey

According to the table above, Spanish or Spanish Creole speaking residents are triggered as LEP persons at 14 % of the population speaking English less than “very well”. Additionally, Tagalog speaking residents are triggered as LEP persons as 1,157 persons of the total population speak English less than “very well”.

- 2. Frequency of LEP person’s contact with program.**

Front-line staff who have the most frequent encounters with individuals of the “Solutions For Senior’s on the Go” program were questioned regarding the frequency of contact with LEP persons. (survey attachment 1) The results of the survey with regard to frequency of LEP person’s contact with the Program are below.

Of the 4 staff who were surveyed regarding past experience with LEP's, 2 (50%) indicated having no contact with individuals who are non-English speaking or Limited English Proficient.

One (1) respondent indicated they come into contact with LEP's rarely or infrequently; 3 to 4 times per year.

One (1) respondent indicated that they come into contact with an LEP person on average one (1) time per month.

All four (4) respondents indicated that all encounters with LEP's were with those who spoke Spanish as their primary language.

No encounters with other LEP's speaking other languages were identified in this survey process.

3. Determine the nature and importance of the program, activity, or service by the program to people's lives.

The "Solution's For Senior's on the Go" is a Senior (65 and older) transportation program designed to provide three transportation services to Oceanside Senior Citizens; (1) Taxi Voucher Program, (2) Van/Shuttle Service, (3) Volunteer Driver Program. There is *not* a predominant number of Spanish speaking seniors currently seeking out and or receiving services from the programs on a daily basis. According to the interviews with front-line personnel, Spanish speaking seniors are contacting the program less than once per month to learn about and or apply for services. Furthermore, according to the interviews with front-line personnel, Spanish Creole speaking seniors have *never* contacted program staff seeking services. Asian speaking families were not identified as having contact with program staff and are identified as *never* contacting the program apply for services. Despite the rather low number of contacts with the program, the City of Oceanside's "Solutions For Senior's on the Go" program staff understand that there may be a need to enhance the ability of our LEP's to access these necessary transportation services. Therefore the translation of vital program documents will be implemented into the program's marketing strategies to ensure that the low-response by LEP's is not due, in part, to the lack of ability to understand the services offered by "Solutions For Senior's on the Go".

4. Determine the resources available to grantee/recipient and the costs to provide language services.

Resources for implementing language services for Spanish speaking LEP persons are sufficient. A total of nine personnel (within the Neighborhood Services Department) are available to assist with translation and interpretation. Written vital documents are translated into Spanish and are been reviewed by alternate personnel. Partnering organizations and active community members also currently provide language services for Spanish speaking LEP persons. Staff training resources are limited, but potential free services can be sought. “Solutions For Senior’s on the Go” program site has one (1) full-time staff person who can provide both written and verbal (via phone and in person) translation for LEP’s – Spanish speaking. (This staff person is not funded by the program but is onsite at the program’s location and available to assist).

Resources for implementing language services for Tagalog speaking LEP persons are uncertain. An assessment of resources should be conducted as part of a Language Access Plan.

Conclusion:

Considering the balance of the four factor analysis with City of Oceanside’s “Solutions For Senior’s on the Go” program, language access services should be provided to *Spanish speaking LEP persons to the fullest extent allowable with available resources*. While the four factor analysis also identifies Spanish Creole as qualifying for access to resources, the program staff survey data did not indicate a strong need for the provision of full language access services at this time. Spanish Creole is a language derived from the Spanish language but is spoken in up to three separate dialects for which resources are not available for full document translation at this time. Language access services should be provided to *Tagalog speaking and Spanish Creole speaking LEP persons at a good faith effort* to include the possible translation of an application document, translation of notices, and access to an interpretation service should it be needed.

Safe Harbor Provision

The Safe Harbor Provision applies to the translation of written documents for LEP populations. The “Solutions For Seniors on the Go” transportation program will ensure that written translation for the vital program and Title VI documents are made available as per the Four Factor Analysis determination of language groups in Oceanside that constitute five percent or 1,000 persons, whichever is less, of the total population of persons eligible to be served.

Language Assistance

This section is to inform all “Solutions For Seniors on the Go” personnel about the ways in which language assistance shall be provided. As determined in the Four Factor Analysis (2014), the “Solutions For Seniors on the Go” shall provide some level of language assistance to LEP persons who speak Spanish and Tagalog. The level at which the program has contact with LEP persons determines the extent to which language services shall be provided.

Spanish speaking language assistance:

- 1) LEP persons who speak Spanish shall receive interpretation for general customer service by in-house personnel at all times.
- 2) The “Solutions For Seniors on The Go” shall have at least one staff member who can be available to provide interpretation for one-to-one meetings with Spanish speaking LEP participants.
- 3) The translation of vital documents shall be conducted in-house with the review of the document by a second translator. Vital documents that shall be translated to Spanish by in-house translators include:
 - a) “How to Ride” program documents and literature,
 - b) Applications,
 - c) Notice to the Public,
 - d) Complaint forms and procedures
- 4) Other non-vital outreach/marketing materials shall be translated subject to the availability of resources.

Tagalog speaking language assistance:

- 1) LEP persons who speak Tagalog shall be assisted as resources allow through the following good faith efforts:
 - a. “Solutions For Seniors on the Go” staff shall determine if the LEP person has an accompanying family member or friend that may speak English and offer interpretation for general customer service.
 - b. “Solutions For Seniors on the Go” staff shall be provided the contact information for a telephone interpretation resource.
 - c. Solutions For Seniors on the Go” staff shall monitor and further assess the level of contact with Tagalog speaking LEP persons over the 2014 program year to better determine the resources that should be made available for on-going language assistance.

Providing Notice

1. Signs shall be posted in all first contact lobbies informing Spanish speaking LEP persons of the available free interpretation services, respectively.
2. The available language assistance shall be noted on all vital outreach materials and on the “How to Ride” materials.

Monitoring the LAP

Ongoing monitoring will take place as this Plan is implemented in the 2014-15 program year. Assignment of the day-to-day administration of the outlined LEP Program will ensure regular monitoring and assessment of contact with LEP's. Routine staff questionnaires and surveys to assess the contact with LEPs will ensure proper modifications are made to the access plan to adjust for changing needs in the LEP community. Based on this information appropriate changes will be made on an ongoing basis to ensure that the “Solutions For Seniors on the Go” program is accessible by the members of the Oceanside community. Information gathered through this analysis will assist in updating and developing an ongoing LAP.

Training Employees

All “Solutions for Seniors On the Go” personnel shall be trained about the Four Factor Analysis and the Language Access Plan (LAP) annually. Training shall include, at a minimum, the following:

- 1) The results of the Four Factor Analysis and the determinations for the Program Year as written in the LAP.
- 2) Guidelines for translation and interpretation.
- 3) How to assist LEP program participants by phone or in person
 - a. use of iSpeak Language Cards to help identify the language spoken to try to assist in finding appropriate translation (attachment 2)
 - b. use of CTS LanguageLink telephone service (attachment 3)

“Solutions For Seniors on the Go” governing board information:

The “Solution’s For Seniors on the Go” program is a service provided by the Parks and Recreation Department, a Division of the Neighborhood Services Department of the City of Oceanside. This program does not have a transit-related board, non-elected planning board, advisory council or committee. The City of Oceanside’s five-member City Council is the legislative body of the City, serves as it corporate board of directors, and is responsible for establishing City policy. The Mayor and Councilmembers are elected at-large for staggered four-year terms.

Title VI Equity Analysis

No facilities have been constructed as part of the “Solutions For Seniors on the Go” program.

**City Council Resolution – attach here upon City Council Approval of Title VI Plan on
June 25, 2014.**

(attachment 4)

Attachments:

1. Language Link User information
2. ISpeak Language Cards
3. Staff Questionnaire
4. City Council Resolution
5. Translated Documents
 - a. Notice to The Public – Spanish Translation
 - b. Complaint Form – Spanish Translation
 - c. Solutions For Seniors on the Go Program Application – Spanish Translation
 - d. “How to Ride” Card – Spanish Translation
 - e. “Interpretation Services Available Here” signage – Spanish Translation
 - f. Language Link User information – Spanish Translation



How to Use Interactive Voice Response (IVR)

- Step 1:** Call 1 888-338-7394
- Step 2:** Enter Account Number **10197**, followed by # sign
- Step 3:** Select 1 to be connected directly to your Spanish interpreter, *or* Select 2 to be connected directly to your Russian Interpreter, *or* Select 9 for all other languages
- *If you require a 3rd party call, press 9 to reach a Customer Service Representative
- Step 4:** Enter Cost Center Number, followed by # sign
- Step 5:** Enter Location Code, followed by # sign

IVR FAQs:

What if I do not know my Account number?

You do need this information in order to reach the interpreter directly. If you are unsure of your account number, wait and the system will direct you to a live operator who will look up your account.

What is IVR?

IVR stands for Interactive Voice Response. CTS LanguageLink's IVR system allows a customer to quickly select the language desired for interpretation and be connected immediately to an interpreter without interaction with a live attendant. The benefit of this is an even faster connect time to your interpreter and better service to your limited English proficient (LEP) client.

What is a third party call?

A third party call is when you need CTS LanguageLink to call the LEP client and then bridge the call together with you and the interpreter.

How do I make a third party call with CTS LanguageLink?

If you need a third party call, press 9 (even for Spanish) to reach a Customer Service Representative (CSR) and let the operator know you need a third party call. We are happy to assist you with this at no additional charge. Our *interpreters are not able to make the third party call* directly.

I need another language other than the ones listed. How do I get my interpreter on the line?

Press 9 for other languages and let the CSR know which language you require and they will connect you. If the language is unknown, you may reference the "Point to your Language" visual for help with most requested languages or ask a representative for assistance.

Please contact our Quality Assurance Team if you have any further questions:

Email: qualityassurance@ctslanguagelink.com

Toll Free: 1 (866) 610-1338

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|--------------------------|-------------------------------------------------------------------------------|------------------------|
| <input type="checkbox"/> | ضع علامة في هذا المربع إذا كنت تقرأ أو تتحدث العربية. | 1. Arabic |
| <input type="checkbox"/> | Խորհրդով ենք նշում կատարեք այս քառակուսով, եթե խոսում կամ կարդում եք հայերեն: | 2. Armenian |
| <input type="checkbox"/> | যদি আপনি বাংলা পড়েন বা বলেন তা হলে এই বাক্স দাগ দিন। | 3. Bengali |
| <input type="checkbox"/> | ឈ្មួញក្នុងប្រអប់នេះ បើអ្នកអាន ឬនិយាយភាសា ខ្មែរ ។ | 4. Cambodian |
| <input type="checkbox"/> | Motka i kakhon ya yangin ûntûngnu' manaitai pat ûntûngnu' kumentos Chamorro. | 5. Chamorro |
| <input type="checkbox"/> | 如果你能读中文或讲中文，请选择此框。 | 6. Simplified Chinese |
| <input type="checkbox"/> | 如果你能讀中文或講中文，請選擇此框。 | 7. Traditional Chinese |
| <input type="checkbox"/> | Označite ovaj kvadratić ako čitate ili govorite hrvatski jezik. | 8. Croatian |
| <input type="checkbox"/> | Zaškrtněte tuto kolonku, pokud čtete a hovoříte česky. | 9. Czech |
| <input type="checkbox"/> | Kruis dit vakje aan als u Nederlands kunt lezen of spreken. | 10. Dutch |
| <input type="checkbox"/> | Mark this box if you read or speak English. | 11. English |
| <input type="checkbox"/> | اگر خواندن و نوشتن فارسی بلد هستید، این مربع را علامت بزنید. | 12. Farsi |

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

- Assinale este quadrado se você lê ou fala português. 26. Portuguese
- Însemnați această căsuță dacă citiți sau vorbiți românește. 27. Romanian
- Пометьте этот квадратик, если вы читаете или говорите по-русски. 28. Russian
- Обележите овај квадратик уколико читате или говорите српски језик. 29. Serbian
- Označte tento štvorček, ak viete čítať alebo hovoriť po slovensky. 30. Slovak
- Marque esta casilla si lee o habla español. 31. Spanish
- Markahan itong kuwadrado kung kayo ay marunong magbasa o magsalita ng Tagalog. 32. Tagalog
- ให้กาเครื่องหมายลงในช่องถ้าท่านอ่านหรือพูดภาษาไทย. 33. Thai
- Maaka 'i he puha ni kapau 'oku ke lau pe lea fakatonga. 34. Tongan
- Відмітьте цю клітинку, якщо ви читаете або говорите українською мовою. 35. Ukrainian
- اگر آپ اردو پڑھتے یا بولتے ہیں تو اس خانے میں نشان لگائیں۔ 36. Urdu
- Xin đánh dấu vào ô này nếu quý vị biết đọc và nói được Việt Ngữ. 37. Vietnamese
- באצייכנט דעם קעסטל אויב איר לייענט אדער רעדט אידיש. 38. Yiddish

STAFF SURVEY – FOUR FACTOR ANALYSIS

To begin qualifying the “Solutions For Seniors on The Go” program staff and support staff’s previous experience with the Limited English Proficiency (LEP) individuals, please complete the survey below:

1. While performing work functions or while providing support to “Solutions For Senior’s on the Go” program staff and participants, have you ever come in contact with individuals who are non-English speaking or Limited English Proficient (LEP)?
2. How frequently do you come in contact with LEP individuals participating in “Solutions For Senior’s on the Go”?
3. Can you identify the languages spoken (non-English)?
4. What questions about the program were asked by LEP individuals?
5. (if applicable) Were you able to successfully communicate with LEP individuals?

Como Usar Respuesta de Voz Interactiva (IVR)

Paso 1: Llamar 1 888-338-7394

Paso 2: Entroduzca numero de cuenta 10197, y enseguida el signo de #

Paso 3: Seleccione 1 para ser conectado con un interprete en Espanol, o
Seleccione 2 para ser conectado con su interprete Ruso, o
Seleccione 9 para otros lenguajes

*Si usted requiere una llamada de tercer partido, presione 9 para alcanzar a un Representante de Servicio al Cliente

Paso 4: Entre el numero de Cost Center, y enseguida el signo de #

Paso 5: Entre el codigo de locacion, y enseguido el signo de #

Preguntas recuentes de IVR:

Que si no se mi numero de cuenta?

Usted si necesita esta información a fin de alcanzar al intérprete directamente. Si usted esta inseguro de su número de cuenta, espera y el sistema le dirigirá a un operador en vivo que buscará su cuenta.

Que es IVR?

IVR significa respuesta de voz interactiva. El Sistema IVR permite que un cliente seleccione rápidamente el lenguaje deseado para la interpretación y sea conectado inmediatamente con un intérprete sin la interacción de un asistente en vivo. La ventaja de este es un tiempo de conexión aún más rápido a su intérprete y mejor servicio a su cliente (LEP) competente de ingles limitado.

Que es una llamado de tercer partido?

Una llamada de tercer partido es cuando usted necesita que CTS LanguageLink llame al cliente LEP y luego conectar la llamada junto con usted y el intérprete.

Como puedo hacer una llama de tercer partido con CTS LanguageLink?

Si necesita una llamada de tercer partido, **presione 9 (aun para espanol)** para hablar con un Representante de Servicio al Cliente (CSR) y dejarle saber al operador que necesita una llamada de tercer partido. Somos felices asistirle con esto sin cargo adicional. Nuestros **intérpretes no son capaces de hacer la llamada de tercero partido directamente.**

Necesito otro lenguaje además de los que están en la lista. ¿Como consigo a mi intérprete en la línea?

Presione 9 para otras lenguas y dejan al representante saber qué lenguaje usted requiere y ellos le conectaran. Si el lenguaje es desconocido, usted puede referirse al "apunte a su Lenguaje" visual para la ayuda con los lenguajes más solicitados o pedir ayude a un representante.

Por favor póngase en contacto con nuestro Equipo de Garantía de Calidad si usted tiene algunas otras preguntas:

Correo electronico: qualityassurance@ctslanguagelink.com

Llamada Gratis: 1 (866) 610-1338

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RESOLUTION NO.

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF OCEANSIDE AUTHORIZING THE ADOPTION OF THE TITLE VI COMPLIANCE PLAN FOR THE "SOLUTIONS FOR SENIOR ON THE GO", SENIOR TRANSPORTATION PROGRAM.

WHEREAS, the "Solutions For Seniors on the Go" Senior Transportation Title VI Plan is required 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".

WHEREAS, the City of Oceanside wishes to authorize approval of the Title VI Compliance Plan developed by staff to comply with the necessary provisions of the Civil Rights Act of 1964;

WHEREAS, the City of Oceanside understands that projects funded through the CalTrans New Freedom Grant Program for Senior Transportation Services require an approved Title VI Compliance Plan prior to the execution of the program Standard Agreement and before the commencement of program delivery;

NOW, THEREFORE, the City Council of the City of Oceanside does resolve as follows:

SECTION 1. The City of Oceanside approves the Title VI Compliance Plan for the "Solutions for Seniors on the Go" program and authorizes the "Solutions For Seniors on the Go" program coordinator to implement the components of the plan in order to meet the Federal requirements.

SECTION 2. The City of Oceanside authorizes the "Solutions For Seniors on the Go" program manager to implement policies that may be necessary to comply with subsequent revisions or interpretations to the Civil Rights Act.

1 PASSED AND ADOPTED by the City Council of the City of Oceanside, California, this
2 _____ day of _____, 2014 by the following vote:

3 AYES:

4 NAYS:

5 ABSENT:

6 ABSTAIN:

7
8
9 _____
10 Mayor Of The City Of Oceanside

11 ATTEST:

11 APPROVED AS TO FORM:

12
13
14 _____
15 City Clerk

14
15 
16 City Attorney