



TITLE VI PROGRAM

Developed: May 2014
Updated: April 2019
Approved by AgingNext
Board of Directors:
April 3, 2019

AgingNext
141 Spring St.
Claremont, CA 91711
909-621-9900
WWW.AgingNext.ORG

This document was prepared by Pomona Valley Community Services, Inc. (hereinafter referred to as "AgingNext") and approved by its Board of Directors to comply with Title VI of the Civil Rights Act of 1964, including new provisions detailed in U.S. Department of Transportation's FTA Circular 4702.1B "Title VI Requirements and Guidelines for Federal Transit Administration Recipients"

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AgingNext Title VI Notice to the Public

Notifying the Public of Rights Under Title VI

AgingNext

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

- AgingNext operates its programs and services without regard to race, color, and national origin in full compliance with Title VI.
- Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with AgingNext. All complaints will be fairly and objectively investigated.
- To file a complaint, you may contact AgingNext at (909)621-9900 or visit our administrative office at 141 Spring St. Claremont, CA 91711
- For more information about AgingNext' Title VI program and complaint procedure, contact (909)621-9900; or visit AgingNext website: www.agingnext.org
- A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Title VI Program Coordinator, FTA Office of Civil Rights, East Building, 5th Floor- TCR, 1200 New Jersey Ave., S.E., Washington D.C. 20590
- If information is needed in another language, contact (909)621-9900
- Si se necesita información en español, llame (909)621-9900
- 如果信息是需要另一种语言接触 (909) 621-9900
- Kung ang impormasyon ay kinakailangan sa ibang wika, tumawag sa (909)621-9900
- 다른 언어로 정보가 필요하다면 (909) 621-9900으로 연락하십시오.
- Nếu cần thông tin bằng ngôn ngữ khác, hãy liên hệ (909)621-9900

AgingNext Título VI Notificación al Público

Notificación al Público de los Derechos Bajo el Título VI AgingNext

AgingNext se compromete a garantizar que ninguna persona debe ser excluida de la distribución igualitaria de servicios y comodidades a causa de raza, color y el origen nacional, de conformidad con el Título VI del Acta de Derechos Civiles de 1964.

• AgingNext opera sus programas y servicios sin tener en cuenta raza, color y origen nacional en plena conformidad con el Título VI. • Cualquier persona que cree que él o ella ha sido agraviada por cualquier práctica discriminatoria ilegal bajo el Título VI puede presentar una queja a AgingNext. Todas las quejas serán investigadas de manera justa y objetiva.

• Para presentar una queja, puede comunicarse con AgingNext (909)621-9900 o visite nuestra oficina administrativa en 141 Spring St. Claremont, CA 91711

• Para obtener más información sobre el programa de AgingNext Título VI y el procedimiento para presentar una queja, llame al (909) 621-9900; o

visite la página web de AgingNext:
www.agingnext.org

• Un demandante puede presentar una queja directamente con Federal Transit Administration mediante la presentación de una queja ante Title VI Program Coordinator, FTA Office of Civil Rights, East Building, 5th Floor- TCR, 1200 New Jersey Ave., S.E., Washington D.C. 20590

• If information is needed in another language, contact (909)621-9900

• Si se necesita información en español, llame (909)621-9900

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List of Locations Where Title VI Notice Is Posted

AgingNext notice to the public is currently posted at the following locations:

Location Name	Address	City
AgingNext office	141 Spring St.	Claremont
Website	www.agingnext.org	

The Title VI notice and program information is also provided to all new and existing participants.

AgingNext Title VI Complaint Procedures

As a recipient of federal dollars, Pomona Valley Community Services, Inc. (hereinafter referred to as "AgingNext") 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. AgingNext 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. The Complaint Procedures and Complaint Form are posted on our website at www.agingnext.org

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by AgingNext may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form. AgingNext investigates complaints received no more than 180 days after the alleged incident. AgingNext will only process complaints that are complete.

Within 10 business days of receiving the complaint, AgingNext Title VI Program Administrator, Floy Biggs, will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office. AgingNext 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, AgingNext 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 AgingNext can administratively close the case.

A case can be administratively closed also if the complainant no longer wishes to pursue their case. After the investigator reviews the complaint, she/he will issue one of two letters to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. An LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member, or other action will occur. If the complainant wishes to appeal the decision, she/he has 30 days after the date of the closure letter or the LOF to appeal to the AgingNext Board of Directors or its designee. The complainant is entitled to review the denial, to present additional information and arguments, and to a separation of functions (i.e. a decision by a person not involved in with initial decision to deny eligibility). The complainant is entitled to receive written notification of the decision of the appeal and the reasons for it.

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

AgingNext Title VI Complaint Form

Section I: Please write legibly		
1. Name:		
2. Address:		
3. Telephone:	3.a. Secondary Phone <i>(Optional)</i> :	
4. Email Address:		
5. Accessible Format Requirements?	<input type="checkbox"/> Large Print	<input type="checkbox"/> Audio Tape
	<input type="checkbox"/> TDD	<input type="checkbox"/> Other
Section II:		
6. Are you filing this complaint on your own behalf?	YES*	NO
*If you answered "yes" to #6, go to Section III.		
7. If you answered "no" to #6, what is the name of the person for whom you are filing this complaint? Name:		
8. What is your relationship with this individual:		
9. Please explain why you have filed for a third party:		
10. Please confirm that you have obtained permission of the aggrieved party to file on their behalf.	YES	NO
Section III:		
11. I believe the discrimination I experienced was based on <i>(check all that apply)</i> :		
<input type="checkbox"/> Race	<input type="checkbox"/> Color	<input type="checkbox"/> National Origin
12. Date of alleged discrimination: <i>(mm/dd/yyyy)</i>		
13. Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known), as well as names and contact information of any witnesses. If more space is needed, please attach additional sheets of paper		

AgingNext Title VI Complaint Form, Page 2

Section IV:		
14. Have you previously filed a Title VI complaint with AgingNext ?	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:

AgingNext Title VI Administrator:

Floy Biggs, CEO

AgingNext

141 Spring St.

Claremont, CA 91711

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

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

AgingNext 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.				



TITLE VI PROGRAM

Public Participation Plan

Developed: May 2014

Updated: April 2019

Approved by AgingNext

Board of Directors:

April 3, 2019

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Public Participation Plan

About AgingNext

AgingNext is a 501(c) (3) not-for-profit organization that provides a broad array of programs, services, and support for older adults, caregivers, and others interested in enhancing aging services in our community. Well into our fourth decade of service, we play a unique role as a convener, information resource and collaborator on senior issues throughout the Inland, Pomona and East San Gabriel Valleys. AgingNext is recognized for its multi-community scope and service area. We work in concert with a range of community leaders, social, healthcare, city and county organizations, businesses and service providers whose collaborative engagement is essential to meet the needs of the burgeoning senior population.

Purposes of This Plan

Public participation is the process through which stakeholders can partake directly in agency decision-making, and express their concerns, desires, and values. It is the mission of this agency to make sure we are “To support and educate adults and their families to maintain independence and to age well at home and in the community.” At every opportunity through prescribed methods the agency will solicit input from stakeholders in order to best support persons served without creating disproportionately high and adverse human health or environmental effects on minority and/or low-income populations. AgingNext will engage the public if there is a decrease in mileage reimbursement due to lack of federal funds or discontinuation of the program Community Connections due to lack of federal funds.

Outreach Requirements and Activities

The following activities are intended to serve as guidelines for outreach to ensure that all riders and potential riders have equal access and opportunity to participate in transportation planning and decision-making. These also provide strategies for soliciting input and engaging various communities.

Any notices will be posted at least two weeks prior to the public event.

- Notices may be posted at AgingNext office, at key community centers/ senior centers with whom AgingNext has relationship.
- Information about public participation opportunities will also be posted on AgingNext website at least two weeks prior to the event.
- Comments will be accepted via the AgingNext website, at public outreach events, via email, by mail, and by phone to ensure that all populations have the opportunity to participate

Meetings

- AgingNext will host public meetings in facilities that are ADA accessible and at time that will allow the majority of participants to attend.

Outreach Methods to Engage Minority and Limited English Proficient Populations

- Spanish, Chinese, Tagalog, Korean, and other Asian and Pacific Island Languages notices will be developed and posted with English notices.
- Event information on AgingNext website will be posted in English, Spanish, Chinese, Tagalog, Korean, and other Asian and Pacific Island Languages as appropriate and necessary.
- AgingNext will distribute event information to community groups and agencies that work with LEP populations, if such contacts exist.
- AgingNext staff as is possible will provide interpretation or translation at any public meetings or workshop. When it is appropriate or necessary, AgingNext will insure non-English language interpretation in additional language is available.

Currently, Spanish, Chinese, Tagalog, Korean, and other Asian and Pacific Island Languages are the only quantifiable population within AgingNext' service area that is limited English proficiency. AgingNext will continue assessing the language needs of citizens in its service area through its Language Assistance Plan. At such time, as another group with limited English proficiency reaches significant mass, AgingNext will review this plan and its strategies to engaging with non-English speaking populations.

Outreach methods to engage minority and limited English proficient populations

- AgingNext will continue cultivating relationships with community agencies that serves LEP populations.
- Public outreach events may include attending already existing community meetings and gatherings, such as school meetings, farmer's markets, faith-based events, and other community activities in order to invite participation from LEP populations who may not attend AgingNext hosted public events.
- AgingNext will ensure that non-English language interpretation will be available at any public meeting or workshop as is appropriate and necessary.

Summary of Outreach Efforts Made Over the Last Three Years

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

- **Board Meetings Open to the Public-** AgingNext bi-monthly Board meetings are open to the public and announced on the agency's website.
- **Presentations to Senior Centers-** AgingNext has done presentation's in all Senior Centers in the 16 cities we cover; Azusa, Chino, Chino Hills, Claremont, Covina, Diamond Bar, Glendora, La Verne, Montclair, Ontario, Pomona, Rancho Cucamonga, San Dimas, Upland, Walnut, and West Covina. The presentations cover AgingNext 8 different programs which serve disabled individuals and seniors; Community Connections, Senior Companion Program, Foothill Communities RSVP, Get About, REAL Connections, The Enrichment Center, Family Caregiver Support Program, and Senior Helpline. As a portion of each presentation there is an opportunity to ask questions and provide feedback to AgingNext staff about service issues and needs. Presentations have been made in both English and Spanish as needed. Informational materials, such as, brochures were provided in both languages as well.
- **Senior Health Fairs and Other Special Events-** AgingNext staff participates in local transportation and senior events held in our covered areas. Most recently AgingNext staff participated in the Chaffey College 12th annual volunteer fair on October 17, 2018.
- **Connections Newsletter for Seniors-** AgingNext distributes 2,000 copies monthly of its Connections Newsletter to social service agencies, community centers and medical facilities.
- **Chaffey Community College and University of La Verne-** When invited AgingNext will present to classes. These presentations are not open to the public as they occur on school property.

- **San Bernardino County Transportation Authority** - Public and Specialized Transportation Advisory and Coordination Council meets quarterly and is open to the public.
- **Village Movement California Coalition**- is a statewide coalition that will provide leadership that can leverage the power and collective intelligence of a widely diverse group of villages and individuals. By building strategic alliances, increasing public awareness, and advocating for middle class solutions, a statewide coalition will give voice to the positive impact villages have on local economies, social capital, public health and well-being.
- **Senior Housing**- AgingNext has partnered with many senior housing facilities like; Claremont Place, Hillcrest, Pilgrims Place, Atria del Rey, Briarwood Manor, Emerson Village, Serenity Villas etc. AgingNext will do presentations at these facilities and will send staff to participate in health fairs.
- **Annual Satisfaction Surveys**- AgingNext conducts annual surveys with program participants of the agency to determine level of satisfaction and gain input regarding unmet needs.
- **Claremont Committee of Aging**- Group of seniors and professionals dedicated to making Claremont an age friendly city.



TITLE VI PROGRAM Language Assistance Plan

**Developed: May 2014
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1. Introduction

This Language Assistance Plan was developed during the process of preparing AgingNext Title VI Program to ensure that AgingNext programs are accessible to Limited English Proficient (LEP) individuals. Title VI of the 1964 Civil Right Act is one of two federal mandates that guarantee the provision of meaningful access to federally-funded services for LEP individuals:

- Title VI of the 1964 Civil Right Act prohibits federally-funded agencies from discriminating against individuals based on race, color, and national origin and includes meaningful access to LEP customers.
- President's Executive Order 13166, "improving Access to Services for Persons with Limited English Proficiency" (August 11, 2000): Instructs federal agencies to improve access to services by mandating that any federally conducted or assisted programs of activities (e.g. recipients of federal funding) must provide meaningful access to LEP customers.
- 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 population. 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 of 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 requirements 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.

AgingNext Title VI Program was prepared in the spring of 2014 and has since been updated in the spring of 2017 in accordance with FTA Circular 4702.1B, Title VI Requirements and Guidelines for Federal Transit Administration Recipients, October 1, 2012.

AgingNext Title VI Program Administrator is:

Floy Biggs, CEO

AgingNext

141 Spring St.

Claremont, CA 91711

(909) 621-9900

Email – Floy@agingnext.org

More information about AgingNext Title VI Program is available at: www.agingnext.org

2. Overview of AgingNext Service Area and Services

AgingNext is serving the cities of Azusa, Chino, Chino Hills, Claremont, Covina, Diamond Bar, Glendora, La Verne, Montclair, Ontario, Pomona, Rancho Cucamonga, San Dimas, Upland, Walnut, and West Covina.

AgingNext houses Community Connections. Community Connections is an innovative volunteer driver program that provides door-through-door assisted transportation service to seniors and individuals with disabilities who cannot easily use other transportation services. The key to the program is providing mileage reimbursement for volunteers to transport individuals who are too frail, ill or unable to use public transportation for other reasons.

3. Language Assistance Goals

AgingNext goal is to provide meaningful access to LEP customers of AgingNext programs, information and materials by developing a Language Assistance Plan and by regular evaluation of the developed methods and strategies.

4. Results of the Four Factor Analysis

Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient.

AgingNext used available census data to determine the geographic boundaries of its service area and identify LEP populations within that area. AgingNext utilized the American Community Survey to identify languages spoken by individuals within the 16 cities that are covered.

Based on our analysis we found 5 language groups with populations of LEP individuals greater than the Safe Harbor Provision level of over 5% or 1000 individuals (whichever is less).

The results of the analysis are shown below in table 4-1

Los Angeles & San Bernardino County		
Language	Estimate # of individuals that speak English less than “very well”	Percentage
Spanish	104,096	60%
Chinese	33,698	19%
Tagalog	7893	5%
Korean	6920	4%
Asian & Pacific Island Languages	6228	3%

Source: U.S. Census Bureau, 2011-2015 American Community Survey

The 5th highest LEP language group, “Asian and Pacific Island Languages” comprising 3% of the area’s population that speaks English less than “Very well”. Informed by previous experience, past community and staff surveys and anecdotal evidence, CSS determined that Vietnamese is the most common Asian language in its service language. While CSS will not immediately translate vital documents into Asian languages, as this percentage is below the Safe Harbor Provision, it will continue to monitor the proportions of LEP individuals and corresponding languages as detailed in Section 6 in the following pages.

The next highest LEP language groups after Spanish, Chinese, Tagalog, Korean, and other Asian and Pacific Island Languages are other Indo-European languages, Vietnamese, and Arabic. After considering the margin of error with these languages AgingNext will not immediately translate vital documents into, Indo-European

languages, Vietnamese, and Arabic the languages currently below the Safe Harbor Provision, it will continue to monitor proportions of LEP individuals among these groups.

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

A survey of AgingNext phone reception staff indicated calls from LEP persons are received 3-4 times per week. Primarily these calls are made by Spanish speakers, but about 1 call per month come from Chinese speakers.

Based on the information from the staff survey, Spanish speaking individuals are accessing AgingNext programs weekly. Other LEP individuals are accessing the AgingNext, programs far less often. Based on information derived from the development of the Title VI plan, AgingNext will continue outreach using Spanish, Chinese, Tagalog, Korean, and other Asian and Pacific Island Languages information and materials. AgingNext will continue to monitor contact with the agency by other LEP individuals.

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

AgingNext transportation program, Community Connections, provides our riders with access to many vital resources. These include medical appointments, therapy, shopping, and employment as well as centers of social activities like senior centers.

Results of LEP Outreach Activity (as it relates to importance of services)

The importance of AgingNext program, Community Connections is illustrated by the results of a survey of 182 Community Connections riders conducted in August 2016.

2018 Community Connections Rider Survey

88% - Have used Community Connections for medical appointments

67% - Have used Community Connections for shopping and personal errands

97% - Indicate they are more engaged in life as a result of
Community Connections

94%- Indicate that Community Connections is meeting their transportation
needs

Based on this information it is clear that AgingNext serves many transit dependent individuals for whom its services are the primary transportation resource. For this reason, AgingNext is committed to translating vital documents relating to its services. Vital documents are those that demonstrate how to use AgingNext, how to access services and additional information, and information about AgingNext Title VI program.

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

In AgingNext Public Participation Plan, we laid out the types of outreach activities that will be undertaken for various public events. A large portion of outreach will be accomplished through cultivating relationships with key contacts within the LEP populations. AgingNext will keep this network of contacts informed of activities, service and events. AgingNext will work with them to connect with the LEP populations. Use of this network will be a key element in AgingNext outreach strategy and will have little or no associated costs.

We provide the Community Connections brochures, applications, and other documents in Spanish. Promotional materials and announcements for these services are provided in Spanish in communities with high concentrations of LEP individuals. We utilize bilingual personnel in positions coming into frequent contact with LEP individuals. Currently, three (2) of our twelve (11) employees are fluent in both English and Spanish, one (1) of our twelve (11) employees are fluent in both English and Tagalog, and one (1) of our twelve (11) employees are fluent in both English and German.

Table 4-2, below, identifies several potential outreach strategies that may be utilized as is appropriate and their associated costs.

AGINGNEXT TITLE VI PROGRAM FOUR FACTOR ANALYSIS: FACTOR 4

Translation of Written Documents		Interpretation & Translation Services		Advertisements & Outreach	
Specific elements	Unit Costs (range)	Specific elements	Unit Costs	Specific elements	Unit Costs
<i>Vital Documents:</i>		Language Line	\$150/year	Availability of language assistance poster development and printing	No Cost (part of Language Line Contract)
Title VI Notice to the Public		Simultaneous interpreter for level two public events	TBD	LEP-language radio spots (optional)	TBD
Complaint Form	\$100-\$200			Adverts in LEP-language publications (optional)	
Complaint Procedures	\$100-\$200				
Rider Guide	\$100-\$200				
ADA Application	\$100-\$200				
Signage advertising AgingNext language assistance program	\$100-\$200				
System Map	N/A				
Individual route schedules where practical	N/A				
<i>Ad-hoc Documents:</i>					
Fliers/advertisements for public events	TBD				
<i>Website</i>	No Cost				

5. Implementation Plan

Timeline/ Major Milestones

Table 5-1 below lists the major activities associated with this Plan and assigns each an anticipated date to be started or completed. Activities that have been labeled with the “NOW” category are those that have already been completed or are currently in progress.

Table 5-1

Task 1: Identifying LEP Individuals Who Need Language Assistance

ITEM		NOW	
1.1	Assess the LEP population in AgingNext Services service area <ul style="list-style-type: none"> • Four Factor Framework Analysis • Outreach to community groups serving LEP persons • Interview/survey AgingNext staff and contractor personnel about previous experience with LEP individuals 	X	
1.1	Identify areas within the service district and routes serving areas with high concentrations of LEP individuals.	X	

Task 2: Language Assistance Measures

Developing Assistance Procedures

ITEM		NOW	
2.1	Develop a list of language assistance products and methods and how AgingNext can access these.	X	
2.2	Develop procedures for customer service staff regarding: <ul style="list-style-type: none"> • how to respond to LEP callers • how to respond to correspondence from LEPs • how to respond to LEPs in person • how to document LEP needs • how to respond to civil rights complaints. 	X	

Table 5-1, Continued

Task 2: Language Assistance Measures
Translating documents

ITEM		NOW	
2.4	Develop a process for determining: <ul style="list-style-type: none"> • If a particular document needs to be translated into which languages it should be translated. 	X	
2.5	Translate vital documents, including: <ul style="list-style-type: none"> • AgingNext brochures • Polices • Title VI Civil Rights Notice, Complaint Form and Procedures • Community Connections Application 	X	

Task 2: Language Assistance Measures
Live Interpretation or Translation

ITEM		NOW	
2.6	Develop a list of language assistance products and methods and how AgingNext can access these.	X	
2.7	Establish competency standards for interpreters and translators; including: <p style="margin-left: 40px;">AgingNext will determine the interpreter or translator's competency in English and the other language; AgingNext will train the interpreter in specialized terms;</p> <p style="margin-left: 40px;">AgingNext will instruct the interpreter or translator that he or she should not deviate into a role as counselor, legal advisor, or any other role aside from interpreting;</p> <p style="margin-left: 40px;">AgingNext will ask the interpreter to attest that s/he does not have a conflict of interest on the issues that they would be providing interpretation services.</p>	X	
2.8	Develop a AgingNext policy that states that all interpretation and written translation must be performed by approved vendors/individuals whose competency has been established.	X	

Task 3: Training Staff

ITEM		NOW	
3.1	Identify which AgingNext staff and contractor personnel are likely to come into contact with LEP individuals	X	
3.2	Develop procedure/schedule for LEP training for identified AgingNext staff and contractor personnel, for new-hires, and continued training	X	
3.3	Develop curriculum for and train frontline, customer service, and staff likely to interact (operators, etc.) with LEPs in language assistance procedures identified in 2.1 and 2.2 and 2.3	X	

Task 4: Providing Notice to LEP Persons

ITEM		NOW	
4.1	Inventory the existing public service announcements and community outreach AgingNext currently performs.	X	
4.2	<p>Incorporate notice of the availability of language assistance into existing outreach methods</p> <p>Develop language regarding language assistance in multiple languages for posters/signage/notices</p> <p>Develop non-English outreach materials: Place foreign-language ads in publications serving second language populations to share current significant, service-related announcements</p> <p>Place a notice of right to language assistance, at no cost, on important outreach documents and on AgingNext website.</p>	X	
4.3	Create sign in multiple languages informing LEP clients about available language services and post	X	
4.4	<p>Undertake targeted community outreach to LEP populations.</p> <ul style="list-style-type: none"> Continue developing relationships with community leaders & LEP populations identified during Four Factor Analysis Develop policy for when (what type of service changes/announcements) to conduct targeted community meetings for LEP populations 	X	

Task 5: Monitor and Update the Language Assistance Plan

ITEM		NOW	
5.1	Assign Day-to-day administration of LEP program, ensuring compliance and correct implementation.	X	
5.2	Develop a process for receiving feedback on language assistance measures Add a question to any surveys to assess respondents' English proficiency and primary spoken language. On-going dialogue with groups serving LEP populations Review demographic changes reported by ACS and Census data	X	
5.3	Conduct internal monitoring regarding language assistance measures Routinely survey/interview AgingNext staff about interaction with LEP individuals and their ability to successfully interact	X	
5.4	Make changes to the language assistance plan based on feedback received	X	
5.5	Consider new language assistance needs when expanding service Identify service changes affecting areas with high concentrations of LEP individuals and develop mitigation strategies	X	

Responsibility for Implementing the Language Assistance Plan

The Title VI Program Administrator will be responsible for overseeing the implementation of this plan and assigning tasks as appropriate.

AgingNext Title VI Program Administrator is:

Floy Biggs, CEO

AgingNext 141 Spring St.

Claremont, CA 91711

(909) 621-9900 ext. 229

Email – floy@agingnext.org

Language Service Provision

Interpretation Services

1. AgingNext has a contract with Language Line Personal Interpreter to provide simultaneous interpretation for callers with whom staff can't communicate.
2. When a customer calls AgingNext directly and with whom a staff member can't communicate, staff will connect with Language Line to translate. This step will be followed for customers at AgingNext office and other service centers. If there isn't a staff member available who can translate, Language Line services will be used.
3. Simultaneous interpretation at public events will be determined on a case-by-case basis by examining several factors, such as:
 - the type and size of event;
 - the availability of a AgingNext staff member to interpret;
 - the availability of a staff member of a host organization to interpret, etc.

For small outreach events and proactive outreach, bilingual staff members will assist with translation where appropriate and feasible. For large outreach events, where it is appropriate and necessary to do so, AgingNext will hire an interpreter through a local or regional service.

Translation of Vital Documents

1. Based on the results of the four factor analysis, the following vital documents have been translated Spanish, Chinese, Tagalog, Korean, and other Asian and Pacific Island Languages, the LEP languages within AgingNext service area.

Vital Documents - Stage 1

- 1) Title VI Program
 - Title VI Notice to the Public
 - Complaint Form
 - Complaint Procedures
- 2) AgingNext Information
 - Brochure

Vital Documents - Stage 2

1. Signage advertising AgingNext Language Assistance

Program and translated information will be posted on the website.

2. Going forward, the extent of AgingNext ability and obligation to translate written documents will be determined on a case-by-case basis, by looking at all elements presented in the Four Factor Analysis.

AgingNext Website

1. All translated vital documents will be posted on AgingNext website on their respective pages.
2. AgingNext website can be translated in Spanish, Chinese, Tagalog, Korean, and other Asian and Pacific Island Languages
3. and other languages depending on the customer's needs.

Outreach

1. To ensure that LEP individuals are aware of AgingNext language assistance measures AgingNext will develop simple signage that advertise
 - AgingNext number offering free-of-charge interpretation services
 - Information is available in other languages on the website.
2. Language assistance signage will be posted at the following locations:
 - AgingNext offices
 - Community centers and/or popular destinations identified during the Four Factor Analysis and ongoing outreach
3. AgingNext outreach staff will continue developing relationships with organizations that serve LEP individuals and developing strategies to spread awareness of AgingNext language assistance services.

6. Monitoring, Evaluating, and Updating the LAP

1. A thorough review of this Language Assistance Plan will be undertaken every three years concurrent with updating and submitting the AgingNext Title VI Program. At that time, the LEP population will be reassessed, to ensure all significant LEP languages are included in AgingNext language assistance efforts. The following reoccurring reporting and evaluation measures will be used to update the Language Assistance Plan:
2. AgingNext will regularly assess the effectiveness of how AgingNext communicates with LEP individuals by:
 - Including questions about language assistance and information needs on any community surveys
 - Conversations with key contacts that work with LEPs
 - Ad-hoc outreach with LEP groups
3. AgingNext will track its language assistance efforts, including:
 - Reporting front-line staff's interactions with LEP
 - Language Line reports

7. Staff Training

AgingNext holds a Title VI meeting with current employees every 6 months. Any new employee is also trained as soon as they are hired on the following:

- How to respond to LEP callers
- How to respond to correspondence from LEPs
- How to respond to LEPs in person
- How to document LEP needs
- How to respond to civil rights complaints

Membership of Non-Elected Committees and Councils

Focus is not on the representative who serve on the committee. We invite agencies who represent minority groups.

Community Advisory Group

	Caucasian	Latino	African American	Asian American
Number of people	4	3	1	1
Percentage of people	44%	33%	11%	11%

Data was taken on March 1, 2019 9AM

Title VI Equity Analysis

AgingNext does not have transit related facilities. Therefore, the requirements to conduct a Title VI Equity Analysis did not apply to our agency



To support and educate older adults and their families
to maintain independence and to age well
at home and in the community

**COMMUNITY SENIOR SERVICES
BOARD OF DIRECTORS MEETING
Wednesday, April 3, 2019**

MINUTES

The Board of Directors of Community Senior Services met on Wednesday, April 3, 2019 at Mt. San Antonio Gardens located at 900 E. Harrison Avenue, Pomona, CA 91767.

Attending: Kelly Niles-Yokum (Chair), Ryan Samples (Vice Chair), Pauline Abbott (Treasurer), Maureen Beith, Jeffrey Laguna, Mike Nelson, and Sue Yoakum

Absent: Pam Bergman-Swartz and Marivel Zialcita

Staff Present: Floy Biggs, CEO and Abby Nuyda, Vice President

Kelly Niles-Yoakum, Chair called the meeting to order at 7:31 A. M.

Approval of Minutes

Kelly Niles-Yoakum asked if there were any changes or corrections to the minutes of the February board meeting. **Ryan Samples moved and Sue Yoakum seconded the motion that the minutes be accepted as submitted. MOTION CARRIED.**

Board Development

Kelly Niles-Yokum reported the following in developing the Board culture statement:

- the goal is to think who and what we are as a board
- have the board culture statement ready before recruiting new board members
- incorporate the words shared by the board in creating the statement
- board development is in phases in alignment with the roll out of the new name and the strategic plan development
- tentative board orientation in July

The following ideas were voiced:

- Jeffrey Laguna shared that the board should start exploring what the board is not but what we could be. Start thinking about the things that the board could be better at and address areas that the board is uncomfortable pursuing
- Pauline stated that creating the board culture statement is a way of formalizing CSS' board recruitment process

- Kelly thanked the board for their feedback

Philanthropy Committee Report

Jeffrey Laguna reported that the committee met twice and reviewed Philanthropy Plan and its goals. The committee is working on the following goals:

- Expand donor base by 20% (currently ~350) resulting in more diversified sources of revenue and less reliance on government grants: quarterly coffee with donors; brown bag education; a non-ask donor invite event.
- Create donor stewardship plan for robust donor engagement resulting in retention of a least 45% (from 22%): donor appreciation event; sending an impact report; VIP reception for donors who gave two years in a row; creating a donor survey
- Create a culture of philanthropy where all volunteers and staff can articulate the story of impact: this goal is on hold until launch of AgingNext
- Expand the philanthropy team to achieve goals hiring a part-time Philanthropy Manager. Floy Biggs and Cindi Phalen are working on development of the job description.

Financial Report

Abby Nuyda presented the January financial summary. At the next meeting, proposed FY 19/20 budget will be presented. Jeffrey Laguna suggested to have a 10-year budget trend in addition to the budget comparison. He volunteered to help putting together this report.

Title VI Compliance Update

Abby Nuyda, presented the updated Title VI program. As a recipient of Federal Transit Funds, CSS is required to comply with the Title VI compliance program. **Kelly Niles-Yokum moved and Jeffrey Laguna seconded the motion to approve the updated Title VI compliance program. MOTION CARRIED.**

CEO Report

Branding Update

Floy Biggs, Abby Nuyda, and Bea Kirkman met with BLM creative team on March 28th. The team will give the formal timeline in a couple of weeks.

Get About Transportation

Partnership with Pomona Valley Transportation Authority ending on June 30, 2019. PVTA will be taking on customer service of Get About and its dial a ride services.

CCGG Conference

The 39th Annual CCGG conference will be held at University of La Verne. Bea Kirkman, REAL Connections Village Director will be presenting.

Older Americans Month

On May 3rd, Community Senior Services will be holding Artist Gallery Reception at Sanctuary Coffee in celebration of Older American's Month.

Volunteer Recognition Event

Volunteer Recognition Event will be held on June 27th at Claremont Manor. Details to follow

Annual Event

Floy presented this year's annual event theme "Havana Bingo Night". Annual event will be held on Friday, October 11th at Padua Hills Theatre. First committee meeting will be April 24th.

Old Business

There was no old business to discuss.

New Business

There was no new business to discuss.

Meeting was adjourned at 8:23 A. M.

By:

Abby Nuyda

Recorder of Minutes

Community Senior Services
Title VI Program

**Board of Directors Approval of Community Senior Services
Title VI Program
Action Item No. 3**

**AN ACTION ITEM OF THE COMMUNITY SENIOR SERVICES BOARD OF
DIRECTORS AUTHORIZING THE TITLE VI
COMPLIANCE PLAN FOR THE AGENCY.**

WHEREAS, Community Senior Services desires to comply with Title VI of the Civil Rights Act of 1964, including provisions detailed in U.S. Department of Transportation's FTA Circular 4702.1B, "Title VI Requirement and Guidelines for Federal TRANSIT Administration Recipients,"

WHEREAS, the Board of Directors wishes to authorize approval of the compliance plan developed by staff to comply with necessary provisions of the Civil Rights Act,

NOW, THEREFORE BE IT RESOLVED, by the Board of Directors of Community Senior Services as follows:

1. The Chief Executive Officer is authorized to implement the components of the plan in order to meet Federal requirements.
2. The Chief Executive Officer is authorized to implement policies that may be necessary to comply with subsequent revisions or interpretations to the Civil Rights Act.

PASSED AND ADOPTED by the Board of Directors of Community Senior Services, State of California, on this 3rd day of April, 2019



Chair of the Board



To support and educate older adults and their families to maintain independence and to age well at home and in the community.

Title VI Training Checklist
2019

Name:	Signature:	Date:
Floy Biggs	<i>Floy Biggs</i>	4-17-19
Abby Nuyda	<i>Abby Nuyda</i>	4/17/19
Lydia Bourroumand	<i>Lydia Bourroumand</i>	4/16/19
Susan Dominguez	<i>Susan Dominguez</i>	4/17/19
Hannah DeGiuseppe	<i>Hannah DeGiuseppe</i>	4/17/19
Cynthia Angulo	<i>Cynthia Angulo</i>	4/17/19
Linda Chavez	<i>Linda Chavez</i>	4/17/19
Angelika Pittet	<i>Angelika Pittet</i>	4-19-19
Beatrice Kirkman	<i>Beatrice Kirkman</i>	4-19-19
Henry Soleto	<i>Henry Soleto</i>	4-30-19
Angela Montgomery	<i>Angela Montgomery</i>	4/17/19