# Reach Out Morongo Basin Twentynine Palms, CA

## **TITLE VI PROGRAM**

Developed: February 7, 2022

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#### INTRODUCTION

This document was prepared by Reach Out Morongo Basin, Twentynine Palms, CA, to comply with Title VI of the Civil Rights Act of 1964, including new provisions detailed in U.S. Department of Transportation's FTA Circular 4702.1B, "Title VI Requirement and Guidelines for Federal Transit Administration Recipients."



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## Reach Out Morongo Basin - Title VI Notice to the Public

# Notifying the Public of Rights Under Title VI

Reach Out Morongo Basin

- Reach Out Morongo Basin operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the Executive Director, Reach Out Morongo Basin.
- For more information on Reach Out Morongo Basin civil rights program, and the procedures to file a complaint, contact 760-361-1410, or visit our administrative office at 6539 Adobe Rd, Twentynine Palms, CA 92277. For more information, visit www.reachoutmb.org
  - A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590
  - If information is needed in another language, contact 760-361-1410.

## Notificar al público de los derechos bajo el título VI Reach Out Morongo Basin

- Reach Out Morongo Basin opera sus programas y servicios sin respecto a raza, color y origen nacional con arreglo al título VI de la Civil
- Ley de derechos. Cualquier persona que cree que él o ella ha sido agraviado por cualquier práctica discriminatoria ilegal bajo el título VI puede presentar una queja con Executive Director, Reach Out Morongo Basin
- Para obtener más información sobre el programa derechos civiles capaz de industrias y el procedimientos para presentar una queja, llame al 760-361-1410, o visite nuestra oficina administrativa en 6539 Adobe Rd, Twentynine Palms, CA 92277. Para más información información, visite www.reachoutmb.org
  - Un demandante puede presentar una queja directamente con el Federal Transit
     Administration por archivar una queja con la Office of Civil Rights,
     Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR,
     1200 New Jersey Ave., SE, Washington, DC 20590
    - · Si se necesita información en otro idioma, contacte al 760-361-1410.



## **List of Locations Where Title VI Notice Is Posted**

Reach Out Morongo Basin notice to the public is currently posted at the following locations:

Location Name	Address	City
Reach Out Morongo Basin	6539 Adobe Rd	Twentynine Palms, CA
Reach Out Morongo Basin	57088 29 Palms Hwy	Yucca Valley, CA
Organization Owned Vehicles	6539 Adobe Rd	Twentynine Palms, CA

The Title VI notice and program information is also provided on Reach Out Morongo Basin's website at <a href="https://www.reachoutmb.org">www.reachoutmb.org</a>. The email address is: <a href="mailto:director@reachout29.org">director@reachout29.org</a>



## **Title VI Complaint Procedures**

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

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

Within 10 business days of receiving the complaint, Reach Out Morongo Basin 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. Reach Out Morongo Basin 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, Reach Out Morongo Basin or the Executive Director 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 Reach Out Morongo Basin or the Executive Director can administratively close the case.

A case can be administratively closed also if the complainant no longer wishes to pursue their case. After the investigator reviews the complaint, she/he will issue one of two letters to the Complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. An LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member, or other action will occur. If the complainant wishes to appeal the decision, she/he has 10 business days after the date of the letter or the LOF to do so.

A person may also file a complaint directly with the Federal Transit Administration, at FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.



### **Reach Out Morongo Basin Title VI Complaint Form** Page 1 Section I: Please write legibly 1. Name: 2. Address: 3. Telephone: 3.a. Secondary Phone (Optional): 4. Email Address: [ ] Large Print [ ] Audio Tape 5. Accessible Format Requirements? [] TDD [] 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 YES NO the aggrieved party to file on their behalf. Section III: 11. I believe the discrimination I experienced was based on (check all that apply): [ ] National [ ] Color [ ] Race Origin 12. Date of alleged discrimination: (mm/dd/yyyy) 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.



Reach Out Morongo Basin Title VI Complaint Form Page 2 Section IV: 14. Have you previously filed a Title VI complaint with YES NO Reach Out Morongo Basin? **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 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:



Reach Out Morongo Basin Title VI Coordinator 6539 Adobe Rd, Twentynine Palms, CA 92277

## Titulo VI Procedimiento de Queja

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

Cualquier persona que cree que ha sido objeto de discriminación por motives de raza, color, u origen nacional por Reach Out Morongo Basin puede presentar al Titulo VI su denuncia. Reach Out Morongo Basin investiga las quejas no mas de 180 días después del incidente. Reach Out Morongo Basin solo tramitara las quejas que están completas.

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

Si necesita mas información para resolver el caso, Reach Out Morongo Basin o la Executive Director puede contactar al autor de la queja. El autor de la queja tiene 10 días de la fecha que recibió la carta para solicitar un investigador que sea asignado al caso.

El caso se puede cerrar también si el autor de la queja no desea proseguir con el caso. Después de que el investigador analice la queja, el / ella emitirá una de las dos cartas a la denunciante: 1) una carta de cierre o 2) una carta de encontrar. En una carta de cierre se resume las alegaciones y afirma que no había una violación del Título VI, y que el caso se cerrará. En carta de encontrar resume los hechos denunciados y de las entrevistas sobre el supuesto incidente, y explica si alguna acción disciplinaria, se producirá la formación adicional del miembro del personal, u otra acción.

Si el demandante no está satisfecho con la decisión, él / ella tiene 10 días después de la fecha de la carta de cierre o carta de encontrar para apelar a la junta directive.

El demandante también puede presentar una queja directamente con la Administración Federal de Tránsito, de la siguiente manera : Coordinador del Título VI del Programa , FTA Oficina de Derechos Civiles, Edificio Este , 5  $^{\rm o}$  piso - TCR , 1200 New Jersey Ave, SE, Washington, DC 20590.



## Reach Out Morongo Basin Titulo VI Forma de Queja

## Pagina 1

Seccion I: Escribir en forma	ı legible				
1. Nombre:					
2. Direccion:					
3. Telefono: 3.a. Telefono secundario(opcional):				l):	
4. Direccion de correo elec	tronico:				
5.Reuistos de forma	[ ] Impresion grande [ ] Cinta de audio				
accesible?	[] TDD			Otros	
Seccion II:					
6.Esta presentando esta qu			Si		No
*Si usted contesto "Si" to #					
7. If you answered "no" to a complaint? Name:	<sup>‡</sup> 6, what is the r	name of the per	rson	for whom you a	are filing this
8. Cual es su relacion con es	cto individuo.				
o. cuar es su relación con es	ste marviduo:				
9. Por favor, explique por q	ue han presenta	ado para una t	ercei	ra parte:	
				_	
10. Por favor, confirme que			Si		No
la parte agraviada en el archivo en su nombre.			110		
Seccion III:					
11.Creo que la discriminacion que he experimentado fue basado en (marqu todas las que					
correspondan):					
[ ] Raza	[ ] Col	or		[] Origin na	acional
[]	[] Gor			[] Origin no	deloliai
12. Fecha de supuesta discriminacion: (mm/dd/aaaa)					

## Reach Out Morongo Basin Titulo VI Forma de Queja

Pagina 2

13.Explica lo mas claramente posible lo que ocurrio y por que usted cree que son objeto discriminacion. Describir todas las personas que han participado. Incluir el nombre y la informacion de contacto de la(s) persona(s) que discrimina contra usted (si se conoce), asi como los nombres y la informacion de contacto de los testigos. Si se necesita mas espacio, por favor adjunte hojas adicionales de papel.

Seccion IV:			
14. Anteriormente ha presentado un Titulo VI	Si	N.Y	
denuncia con la Reach Out Morongo Basin	51	No	
Seccion V:			
15. Ha presentado esta queja con cualquier otro local, Estato?	estato o federal, o c	on cualquier Federal o	
[ ] Si* [ ] No si la respuesta es si			
Marque todo lo que apliqua			
[ ] Agencia Federal [ ] Agencia	Estatal		
[] Federal Tribunal [] Agencia	Local		
[ ] Tribunal Estatal			
16. Si usted contesto "si" a la posicion #15, proporcion		rca de una persona de	
contacto en la agencia/tribunal donde se presento la denuncia.			
Nombre:			
Titulo:			
Organismo:			
Direccion:			
Telefono: Correo ele	ctronico:		
Seccion VI:			
Nombre de organismo Transito denuncia es contra:			
Persona de contacto:			
Telefono:			



## Reach Out Morongo Basin Titulo VI Forma de Queja

Pagina 3

Puede adjuntar cualquier material escrito u otra información que considere relevante para su queja.

Se requiere la firma y la fecha a continuación para completar el formulario:

r.	- 1	
Firma	Facha	
1 11 111u	reclia	

Envíe este formulario en persona o envíelo por correo a la siguiente dirección: Reach Out Morongo Basin Title VI Coordinator 6539 Adobe Rd., Twentynine Palms, CA 92277

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

Reach Out Morongo Basin has not been involved in any transportation-related Title VI investigations, lawsuits or complaints.

# Reach Out Morongo Basin List of Investigations, Lawsuits and Complaints

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

## **Public Participation Plan**

#### About Reach Out Morongo Basin

Reach Out Morongo Basin is a volunteer caregiving organization that provides supportive, training and referral services to low income, senior and disabled residents of the Morongo Basin region of San Bernardino County. We are the only non-profit driver program serving low income, senior and disabled individuals in our region.

Services include homemaker and chore assistance, friendly visits and reassuring phone calls, pickup and delivery of prescriptions, delivery of meals and food boxes, transportation services to medical and social service appointments, grocery and sundry shopping, and to other quality of life destinations. We also provide family caregiver support services with all the above programs as well as in-home respite and out of home day care services. Our target population is primarily low income disabled and seniors age 60+ with age-based disabilities – such as having balance, vision, hearing, or memory challenges. Some use walkers or other mobility assistive devices.

Reach Out Morongo Basin, formerly Reach Out 29, was formed in 1998 by a coalition of community members and faith-based organizations to fill in the gaps in traditional social services in our rural area. Starting with a small staff of two and utilizing primarily volunteers the services offered were homemaker and chore assistance and pick up of prescriptions and groceries within the City of Twentynine Palms. In 2007 we added an additional office in the Town of Yucca Valley and expanded our service area to encompass the entire Morongo Basin. Our current service area is approximately 1800 square miles with approximately 80% extremely rural and unmaintained dirt roads.

To meet the ever-changing needs of our community, Reach Out Morongo Basin began our transportation program in 2004. This program was born out of gaps identified by senior and disabled individuals while providing other services in our extremely rural area. Time after time transportation came to the top of the list of issues isolating these seniors from their community with no means to get to doctors, shopping or other needs. As a result of these reports our organization researched many transportation models for older adults and developed a volunteer driver program to help utilizing volunteer vehicles and a donated van. The first rides were delivered in mid-2004.

The program has grown and expanded beyond the volunteer model to encompass full time staff drivers with four organization owned vehicles. Transportation is provided within our region to medical, shopping and sundry shopping and other quality of life destinations. Rides are also provided to the San Bernardino and Coachella Valley regions for medical providers and specialists not available in our area. Our transportation program provides services to all adults over the age of 18 with transportation needs and continues to expand year over year. Multiple funding sources are sought to meet the ever-increasing demand.



#### About our Services and Programs

Homemaker and chore assistance as well as friendly visiting and phone calls are provided by staff and volunteers who are recruited, trained and overseen by staff. Services include light housekeeping assistance, minor home repairs and yard work. Many of the volunteers are active duty military personnel from the Marine Corps Air Ground Combat Center which is headquartered in Twentynine Palms or are local community members.

In 2011, Reach Out Morongo Basin began providing Family Caregiver Support Services to unpaid caregivers caring for a senior parent or spouse, or individuals of any age with Alzheimer's Disease or other organic brain dysfunctions. Services provided include pick up and delivery of prescriptions or groceries, peer counseling, peer support groups, caregiver training, in-home respite services, out-of-home day care service, homemaker and chore assistance and transportation service for caregivers and care recipients.

Our governing Board of Directors also actively promote services and programs to the community through various activities and engagements. With members including the Editor of our local newspaper, an Evangelist for a local minority church, a manager of a local senior only mobile home park, business owners as well as senior community members and long term residents of our region, they provide a solid and diverse outreach network.

In addition, offices in the Twentynine Palms Senior Center and Yucca Valley Senior Center provide a unique position to reach our primary client base of senior and disabled individuals. We have two full-time coordinators whose primary duties are to promote services and link clients to programs to meet their needs. Our coordinators work, not only with the individual clients, but also with family members/caregivers who are responsible for the older adult when applicable. Every effort is made to ensure that our clients are well-served and can be safely transported to their destinations.

## 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 "enable seniors to age in place safely and comfortably by providing transportation services, telephone relationships, information and referrals; and offer opportunities for seniors and others who care about aging issues to become agents of change for our communities". Annually a survey is mailed out to all Reach Out Morongo Basin clients to solicit direct input on how we are doing. A sincere effort is made to make these programs to a solid link for our clients to their community through sensitivity, accessibility and a commitment to professionalism.



#### Minimum Outreach Requirements

This section details guidelines Reach Out Morongo Basin follows to ensure our outreach is proactive and inclusive.

- Reach out Morongo Basin routinely Coordinates with local government agencies, congregations and faith-based organizations, community groups and networks and through community events help our engagement strategies to raise awareness of our programs and services.
- To promote our services we utilize public service announcements in local newspapers, on community radio stations and through social media help to reach isolated individuals that may not be reached through other conventional means.
- Brochures, flyers and our e-Newsletter are distributed widely, as detailed in Summary of Outreach Efforts.
- Our governing Board of Directors also actively promote services and programs to the
  community through various activities and engagements. With members including Editor
  of our local newspaper, an Evangelist for a local minority church, a manager of a local
  senior only mobile home park, business owners as well as senior community members
  and long term residents of our region, they provide a solid and diverse outreach network.
- We coordinated with the Yucca Valley Senior Center and Twentynine Palms Senior Center (where our offices are located) to promote our services and events.
- Reach Out Morongo Basin is a member of SBCTA's PASTACC (Public and Special Public and Specialized Transportation Advisory and Coordination Council). Social Services Transportation Advisory Council includes agencies serve older adults, persons with disabilities, persons of low-income, Limited-English Proficient persons and others. This group enables Reach Out Morongo Basin to promote its services and coordinate other agencies in San Bernardino County, as well as provides additional resources
- Reach Out Morongo Basin collaborates is a member of multiple regional bodies and coalitions and routinely makes presentations to promote our services.



# Outreach Methods to Engage Minority and Limited English Proficient Populations

The one significant LEP population that meets the Safe Harbor Threshold is for Spanish speaking households and written translation of brochures and documents is provided. Reach Out Morongo Basin is committed to making its services accessible to all low income, senior and disabled residents of the Morongo Basin. Reach Out Morongo Basin undertakes the following activities to provide access to LEP and other traditionally underserved populations:

- Offices located in the Twentynine Palms Senior Center and Yucca Valley Senior Center where our target population congregates provide unique opportunities for outreach and to be accessible for them.
- Monday through Friday we drive through low income areas and areas where other languages are spoken, making us visible to the general public. Our vans have prominent lettering with organization name, phone number and "Free Medical Transportation" on them.
- We distribute our brochures all over the region where seniors, low income individuals and people with disabilities gather.
- Bi-monthly Public Service Announcements are made through local newspaper and radio stations to promote services to the community at large and to reach extremely rural clients.
- Promotional and vital information may be translated into Spanish in the future if appropriate and funding permits.



## Summary of Outreach Efforts

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

- Offices located in the Twentynine Palms Senior Center and Yucca Valley Senior Center where our target population congregates provide unique opportunities for outreach and to be accessible for them.
- Our drivers are identified to our clients by badges with their pictures and the name of the program.

#### Information

- We distribute our brochures all over the region where seniors, low-income individuals and people with disabilities gather.
- We write articles about senior transportation issues that are published in local papers.
- Bi-monthly Public Service Announcements are made through local newspaper and radio stations to promote services to the community at large and to reach extremely rural clients.
- Monthly E-newsletters are sent and bi-weekly posts on social media sites Facebook, Twitter and Instagram are made to promote programs and services.
- Transportation flyers are on display at older adult events and at community events in which we are asked to participate.
- Our brochures are available at medical offices and local businesses. Volunteers have taken our flyers to churches, club meetings and community events.
- Monday through Friday we drive through low-income areas and areas where other languages are spoken, making us visible to the general public. Our vans have prominent lettering with organization name, phone number and "Free Medical Transportation" on them.

#### Coordination, Memberships and Presentations

• We coordinate with the only other no-cost driver program and cross refer clients to ensure they receive the most appropriate referral.



- Reach Out Morongo Basin holds membership in civic, professional and faith-based groups such as the 29 Palms Chamber of Commerce, Yucca Valley Chamber of Commerce, Alzheimer's Foundation of America, National Volunteer Caregiver Association, Twentynine Palms Ministerial Association and Academy of Grassroots Organizations that help in promoting programs and services.
- Agency staff attend and participate in regional senior coalitions to make our services available to a diverse group of seniors and gather opportunities to serve others.
- Reach Out Morongo Basin is a member of SBCTA's PASTACC.
- Reach Out Morongo Basin has made presentations to local Rotary Club and supports their programs and services.
- Reach Out Morongo Basin makes bi-annual presentations to our local Kiwanis Club International and supports their programs and services.

#### **Events**

- Reach Out Morongo Basin hosts an annual Volunteer and Staff Appreciation Brunch to recognize the achievements of volunteers, drivers, and program staff, to solicit input, and to provide education and training. Clients and stakeholders are invited, and event is open to the public.
- Reach Out Morongo Basin hosts or participates in multiple community events throughout the year where staff and volunteers connect with the public to promote services and programs.

#### **Annual Satisfaction Survey**

Reach Out Morongo Basin conducts annual satisfaction surveys with program
participants and stakeholders of the organization to determine level of satisfaction and
gain input regarding unmet needs.



## Language Assistance Plan

#### Overview

The first section in this document describes the purpose of the Language Assistance Plan (LAP). The second section in this document provides the four-factor Limited English Proficient (LEP) analysis (as outlined by the Department of Transportation (DOT) used to identify LEP needs and assistance measures. The four-factor LEP analysis includes:

- Factor 1: The number or proportion of LEP persons in the service area who may be served or are likely to encounter Reach Out Morongo Basin's support services and transportation program.
- Factor 2: The frequency with which LEP persons come in contact with Reach Out Morongo Basin's support services and transportation program.
- **Factor 3:** The nature and importance of programs and services provided by Reach Out Morongo Basin to the LEP population.
- **Factor 4:** The resources available to Reach Out Morongo Basin and overall cost to provide LEP assistance.

The third and final section discusses the implementation of the Language Assistance Plan, which includes methodologies for identifying LEP individuals, providing services, establishing policies, monitoring the LAP, and recommendations for future LAP implementations.



## Purpose of the Language Assistance Plan

<u>Title VI of the Civil Rights Act of 1964</u> prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance. One critical concern addressed by Title VI is the language barrier that Limited English Proficiency (LEP) persons face with respect to accessing information about and using transit service. Transit operators must ensure that this group has adequate access to the agency's programs and activities, including public participation opportunities.

Executive Order 13166, titled "Improving Access to Services for Persons with Limited English Proficiency," forbids funding recipients from "restricting an individual in any way in the enjoyment of any advantage or privilege enjoyed by others receiving any service, financial aid, or other benefit under the program," or from "utilize[ing] criteria or methods of administration which have the effect of subjecting individuals to discrimination because of their race, color, or national origin, or have the effect of defeating or substantially impairing accomplishment of the objectives of the program as respects to individuals of a particular race, color, or national origin."

<u>FTA Circular 4702.1B</u> was developed by the Federal Transit Administration (FTA) and details the administrative and reporting requirements for recipients of FTA financial assistance to comply with Title VI and related executive orders including on LEP.

The United States Department of Transportation (DOT) published guidance that directed its recipients to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for LEP customers. Reach Out Morongo Basin language assistance plan (LAP) includes a four-factor analysis and implementation plan that complies with the requirements of DOT LEP guidance.



## Four Factor Analysis Reach Out Morongo Basin

# <u>Factor 1:</u> The number or proportion of LEP persons eligible to be served or likely to be encountered by Reach Out Morongo Basin

Reach Out Morongo Basin holds a unique position regarding meeting the Title VI requirements. As a sub-recipient of FTA 5310 Grant funding, the agency's focus is primarily to transport low income, disabled and older adults, most having age-based disabilities where current public transit options are insufficient or do not exist.

Reach Out Morongo Basin is committed to providing full access to all residents of its service area and target population by ensuring that any person who is otherwise unable to secure supportive services or transportation based on economical or situational circumstances will be afforded the benefit of free services or transportation.

#### **American Community Survey**

The U.S. Census Bureau 2019 American Community Survey 5-Year Estimates Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over estimates that of the 56,617 residents in Reach Out Morongo Basin's target/service area (Zip codes 92252, 92268, 92277, 92284, and 92285), 5422 speak Spanish at home and 1614 (or 3%) speak English less than "very well". All other non-English languages resulted in less than 1% of the population.

ZCTA5 - Zip Codes 92252, 92268, 92277, 92284 & 92285	ESTIMATE	PERCENTAGE
TOTAL:	56617	100%
Speak only English	49429	87%
Spanish	5422	9.6%
Speak English "very well"	3808	6.7%
Speak English less than "very well"	1614	3%

<sup>\*</sup>Joshua Tree, Pioneertown, Twentynine Palms, Yucca Valley, Landers

As noted in the U.S. Census Bureau American Community Survey, the number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient for our Target Population is at 3% of the reporting area identified as Spanish speaking with a limited ability to speak English.



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

Historically, contact with LEP consumers occurs only periodically in this program. We have had very few limited English-speaking Hispanic passengers who used our support and transportation services. We have bilingual staff or use bilingual volunteers when this occurs and have translated brochures and information sheets into Spanish as required. We have transported non-English-speaking Asian individuals by coordinating with English speaking family members ahead of time. We do not want someone's ability to speak English to ever deny them access to services.

Annual consumer and care provider surveys provide an opportunity for input and suggested services. Surveys have not contained requests for translation services.

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

Reach Out Morongo Basin transportation program is available to individuals age 18 and up to go to medical appointments and grocery shopping though primary clients are disabled and age 60+. Other support services are available to disabled individuals of any age, seniors 60+ or unpaid caregivers age 18+ of seniors or individuals with Alzheimer's Disease or other organic brain dysfunction. Our programs help people to maintain their independence and live in their own home rather than become institutionalized.

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

- Reach Out Morongo Basin is a small organization with a limited budget and endeavors to keep outreach costs to a minimum. As a non-profit organization we have the support of local newspaper and radio stations that will publish and air Public Service Announcements about available programs and services at no cost. We heavily utilize social media platforms and e-newsletters to send out weekly and monthly promotions for outreach.
- We have bilingual staff or use bilingual volunteers or coordinate with English speaking family members ahead of time, as appropriate.
- Reach Out Morongo Basin holds membership in civic, professional and faith-based groups such as the 29 Palms Chamber of Commerce, Yucca Valley Chamber of Commerce, Alzheimer's Foundation of America, National Volunteer Caregiver Association, Twentynine Palms Ministerial Association, Academy of Grassroots Organizations and Basin-Wide Foundation that help in outreach and promoting programs and services with no additional fees above membership dues.



• Assistance with translation and LEP outreach may also be provided by SBCTA, as appropriate.

#### **SUMMARY**

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

- Only 3% of the Morongo Basin population, age 5 and above, speaks English "less than very well."
- No consumers were underserved or exited the program due to language barriers.
- Reach Out Morongo Basin does not have an LEP specific budget line, but has successfully utilized bilingual staff and volunteers or found another way to communicate with LEPs.
- Reach Out Morongo Basin spends less than \$3000 per year on all outreach efforts.



### Language Assistance Implementation Plan – Reach Out Morongo Basin

### Methodologies/Providing Services/Communicating Availability of Language Assistance

- If a mono-lingual person's family member/friend/care giver calls us, we will work with that person to make their mono-lingual family member/friend/client feel welcome and able to use our supportive and transportation services.
- Some of our staff and volunteer drivers speak, read and write some Spanish and were successful in communicating with Hispanic individuals who do not speak much English.
- We have volunteers in the community we can call on to translate for mono-lingual passengers when necessary that speak Tagalog and Samoan.
- We will continue to reach out to low income, senior and disabled residents so they become acclimated to using our services. If they are limited English speaking, we will ask their friends or family members to translate.
- We have translated brochures into Spanish as the primary LEP language to facilitate outreach to LEP residents as necessary.

#### **Monitoring**

- Staff and volunteer drivers have been asked to report challenging passenger circumstances including language barriers and needs to the volunteer coordinators. To date, our staff has been able to communicate with clients, passengers and prospective passengers.
- Annual Satisfaction Surveys for Reach Out Morongo Basin offers an opportunity for consumers and their care givers to provide input or suggest additional services. To date, translation services have not been requested.
- Clients of support services and transportation passengers often express appreciation verbally or in writing about our drivers and staff for the way our paid and volunteer staff go above and beyond.



#### **Employee Training**

- The executive director trains new staff and volunteers to be sensitive to our clients' needs and boundaries. Training to promote positive communication and courtesy while providing supportive services in the home or in public. Training is also provided for communication around securing seatbelts during transportation so that passengers understand that their personal boundaries are being respected and their personal safety is assured.
- As part of the Accessibility Plan, the executive director works with staff of multiple senior apartments and mobile home parks to promote the use of Reach Out Morongo Basin support programs and transportation services and to learn more about their residents' needs and challenges and to develop strategies for resolving any challenges, in addition in how to help volunteers in addressing language assistance needs for clients with LEP.
- Reach Out Morongo Basin staff periodically make presentations at senior housing complexes to promote support services and transportation program. Communication has been open and comfortable. Those with strong English skills translate as needed.
- The executive director trains program coordinators as situations arise.
- Staff are encouraged to attend community educational events such as senior symposiums where information on a variety of topics is provided.

#### **Safe Harbor Provision**

The Federal Transit Authority Circular 4702.1B states:

"DOT has adopted DOJ's Safe Harbor Provision, which outlines circumstances that can provide a "safe harbor" for recipients regarding translation of written materials for LEP populations. The Safe Harbor Provision stipulates that, if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with the recipient's written translation obligations.

Translation of non-vital documents, if needed, can be provided orally. If there are fewer than 50 persons in a language group that reaches the five percent (5%) trigger, the recipient is not required to translate vital written materials but should provide written notice in the primary



language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost.

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

The LEP population of the Morongo Basin is at 3%, and that 3% is comprised of many languages though primarily Spanish. The only language that meets the threshold that would require having our documents translated at this time is Spanish. Reach Out Morongo Basin translated and has been providing documents in Spanish as the primary LEP language identified.

## **Membership of Non-Elected Committees and Councils**

Reach Out Morongo Basin does not have a non-elected transit related advisory council at this time.

## **Subrecipient Assistance and Monitoring**

This requirement is not applicable as Reach Out Morongo Basin does not have any subrecipients at this time and does not anticipate expanding to include subrecipients.

## **Title VI Equity Analysis**

Reach Out Morongo Basin does not have transit related facilities.





#### **Authorizing Resolution**

RESOLUTION AUTHORIZING THE FEDERAL FUNDING UNDER FTA SECTION 5310

(49 U.S.C. SECTION 5310) WITH CALIFORNIA DEPARTMENT OF TRANSPORTATION

WHEREAS, the U. S. Department of Transportation is authorized to make grants to states through the Federal Transit Administration to support capital projects for non-urbanized public transportation systems under Section 5310 of the Federal Transit Act (FTA C 9070.1G); and

WHEREAS, the California Department of Transportation (Department) has been designated by the Governor of the State of California to administer Section 5310 grants for transportation projects for seniors and individuals with disabilities; and

WHEREAS, [Reach Out Morongo Basin] desires to apply for said financial assistance to permit operation of paratransit service in the area of the [Morongo Basin]; and

WHEREAS, the [subrecipient] has, to the maximum extent feasible, coordinated with other transportation providers and users in the region (including social service agencies).

NOW, THEREFORE, BE IT RESOLVED AND ORDERED that the [Reach Out Morongo Basin] does hereby authorize [Robin Schlosser, ED], to file and execute applications on behalf of [Reach Out Morongo Basin] with the Department to aid in the financing of capital projects pursuant to Section 5310 of the Federal Transit Act (FTA C 9070.1G), as amended.

That [Robin Schlosser, ED] is authorized to execute and file all certification of assurances, contracts or agreements or any other document required by the Department.

That [Robin Schlosser, ED] is authorized to provide additional information as the Department may require in connection with the application for the Section 5310 projects.

That [Robin Schlosser, ED] is authorized to submit and approve request for reimbursement of funds from the Department for the Section 5310 project/s.

Kurt Schauppner

**Board President** 

Date

