



Orange County Adult Achievement Center

TITLE VI PROGRAM

Developed: April 2014, Revised May 2017

**Approved by Orange County Adult Achievement Center's
Board of Directors**

Orange County Adult Achievement Center

225 W. Carl Karcher Way

Anaheim, CA 92801

(714) 744-5301

www.mydaycounts.org

INTRODUCTION

This document was prepared by Orange County Adult Achievement Center 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 Requirement and Guidelines for Federal Transit Administration Recipients." While Orange County Adult Achievement Center is our legal name, My Day Counts is a DBA that we recently created to help market our agency to the greater community.

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**Orange County Adult Achievement Center's
Title VI Notice to the Public**

Notifying the Public of Rights Under Title VI

**Orange County Adult Achievement Center
(OCAAC)**

- OCAAC 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 OCAAC.
 - For more information on OCAAC's civil rights program, and the procedures to file a complaint, contact (714) 744-5301, or visit our administrative office at 225 W. Carl Karcher Way, Anaheim, CA 92801.
For more information, visit www.mydaycounts.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 (714) 744-5301.

Notificar al público de los derechos bajo el título VI
**Orange County Adult Achievement
Center (OCAAC)**

- OCAAC opera sus programas y servicios sin respecto a raza, color y origen nacional con arreglo al título VI de la Ley de derechos Civiles. Cualquier persona que cree que él o ella ha sido agredido por cualquier práctica discriminatoria ilegal bajo el título VI puede presentar una queja con OCAAC.
- Para obtener más información sobre el programa derechos civiles y el procedimientos para presentar una queja, llame al (714) 744-5301, o visite nuestra oficina administrativa en
225 W. Carl Karcher Way, Anaheim, CA 92801.
Para más información, visite www.mydaycounts.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 (714) 744-5301.

List of Locations Where Title VI Notice Is Posted

Orange County Adult Achievement Center's Title VI notice to the public is currently posted at the following locations:

Location Name	Address	City
OCAAC Lobby	225 W. Carl Karcher Way	Anaheim
OCAAC Break Room	225 W. Carl Karcher Way	Anaheim
OCAAC Vehicles	225 W. Carl Karcher Way	Anaheim
Life Unlimited Lobby	1147 N. Anaheim Blvd.	Anaheim
Life Unlimited Break Room	1147 N. Anaheim Blvd.	Anaheim
Website	www.mydaycounts.org	

Title VI Complaint Procedures

As a recipient of federal dollars, Orange County Adult Achievement Center 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. Orange County Adult Achievement Center 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 Orange County Adult Achievement Center may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form. Orange County Adult Achievement Center investigates complaints received no more than 180 days after the alleged incident. Orange County Adult Achievement Center will only process complaints that are complete. Instructions and Title VI Complaint Form may be found on our website (www.mydaycounts.org).

Within 10 business days of receiving the complaint, Orange County Adult Achievement Center 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. Orange County Adult Achievement Center 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, Orange County Adult Achievement Center 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 Orange County Adult Achievement Center 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.

Orange County Adult Achievement Center 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.		

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

Orange County Adult Achievement Center has not been involved in any transportation-related Title VI investigations, lawsuits or 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

Introduction - About Orange County Adult Achievement Center

Orange County Adult Achievement Center (OCAAC) is a non-profit 501(c)(3) organization founded in 1951 by a group of parents who wished to promote education and life skills developmental services for their children. The organization was formally incorporated in 1955 and has been in continuous operation since then. OCAAC is governed by a Board of Directors comprised of 13 members who represent and live in Orange County and who offer a wide range of professional experience as well as personal and philanthropic interests, i.e. business executives, education, finance, health care, legal, and parents of consumers.

OCAAC is a community-based organization located in Anaheim, California. The organization provides a range of services and program options to nearly 600 adults with developmental disabilities living in Orange County, including:

Community Employment Services (CES) provides individualized pre-employment assessments, job development and support services to adults with disabilities so that they can become successfully employed in a job of their choice.

CES is accredited by CARF; having been awarded a three-year accreditation in the fall of 2015. Referrals to CES are made by Department of Rehabilitation (DOR) as well as the Regional Center of Orange County (RCOC). DOR is the funding agent for pre-employment assessments, job development, job placement, and job coaching services for the initial 90-180 days of the consumer's employment. RCOC funds job coaching services once the consumer has successfully completed the initial employment phase, which is typically 90 days for a consumer in an individual placement and 180 days for an individual working in a group. CES also provides case management, advocacy, and other ancillary services needed to support consumers involved in community-based employment. The program does not serve the general public but rather a limited population of adults who have a qualifying disability or developmental disability that are first served by DOR and/or RCOC and are then referred to CES. As such, the program works in conjunction with DOR and RCOC and other agencies to achieve various outreach opportunities. CES currently provides services to approximately 100 consumers.

Consumer Choice Day Activity Program (CCDAP) provides services using a combination of site-based and community-based environments to meet the needs of adults with developmental disabilities whose diversified needs indicate the desirability for an individually structured day program. CCDAP offers program participants a menu of activities designed to meet their needs in a range of domains, including: adult daily living skills, community integration, consumer rights, advocacy and self-advocacy, cognitive and functional skills, personal health and safety, recreation, interpersonal relationships, meal preparation, emergency skill development, personal hygiene and grooming, nutrition, life issues and transitions, adapted exercise, and wellness. CCDAP is licensed to serve a maximum of 100 consumers in its site-based facility.

CCDAP is licensed by the State of California Health and Human Services Department of Social Services Community Care Licensing Division. Referrals to CCDAP are made by Regional Center of Orange County (RCOC), which also acts as the funding agent of services for CCDAP participants. RCOC is the sole referral agency for CCDAP. The program does not serve the general public but rather a limited population of adults with developmental and intellectual disabilities that are first served by RCOC and are then referred to CCDAP. As such, the program works in conjunction with RCOC and other agencies to achieve various outreach opportunities.

Family Connections provides adults with developmental disabilities a family-centered living environment that encourages inclusion in family activities and authentic relationships. Family Connections services target the fostering of a purposeful life by promoting independence, self-determination, self-advocacy and personal growth. Family Connections services include: family home provider (FHP) recruitment, comprehensive evaluation and screening of FHPs, home study, FHP training, consumer intake to identify needs and choices for a family home, transition services, monitoring, case management, advocacy, arranges for specialized services (physical therapist, occupational therapist, medical care, behavior specialist) and adult daily living skill development. Family Connections currently serves approximately 40 consumers.

The California Department of Development Services (DDS) and Regional Center of Orange County (RCOC) provides oversight to Family Connections through bi-annual audits. Referrals to Family Connections are made by RCOC, which also acts as the funding agent of services for Family Connections participants. RCOC is the sole referral agency for Family Connections. The program does not serve the general public but rather a limited population of adults with developmental and intellectual disabilities that are first served by RCOC and are then referred to Family Connections. As such, the program works in conjunction with RCOC and other agencies to achieve various outreach opportunities.

Independent Living Services (ILS) provides individualized services to support persons with intellectual and developmental disabilities in their desire to live more independently and participate in their local communities. ILS services are tailored to meet the needs of consumers and develop those skills needed to live independently, including: living skills assessment to identify needs, cleaning, shopping, menu planning, meal preparation, money management, public transportation utilization, personal health and hygiene, recreation and leisure, accessing medical and dental care, accessing community resources, personal safety, emergency planning, socialization, time management, case management, and advocacy. ILS currently serves 35 consumers.

The Regional Center of Orange County (RCOC) provides oversight to ILS through bi-annual audits. Referrals to ILS are made by RCOC, which also acts as the funding agent of services for ILS participants. RCOC is the sole referral agency for ILS. The program does not serve the general public but rather a limited population of adults with developmental and intellectual disabilities that are first served by RCOC and are then referred to ILS. As such, the program works in conjunction with RCOC and other agencies to achieve various outreach opportunities.

Life Unlimited provides the far majority of its day services in a site-based environment with some community-based activities offered to meet the needs of adults with significant physical and developmental disabilities. Consumers participating in Life Unlimited are provided with a menu of activities that are tailored to meet individual needs while maintaining safety and are designed to encourage choice, provide a wide range of multi-sensory experiences, and promote improvement in overall health. Life Unlimited program services include: sensory stimulation using equipment and experiences (auditory, gustatory, olfactory, proprioceptive, tactile, vestibular, visual), adult daily living skills, community integration, consumer rights, advocacy and self-advocacy, cognitive and functional skills, personal health and safety, recreation, interpersonal relationships, meal preparation, emergency skill development, personal hygiene and grooming, nutrition, life issues and transitions, adapted exercise, physical therapy, and wellness. Life Unlimited is licensed to serve a maximum of 64 consumers in its site-based facility.

Life Unlimited is licensed by the State of California Health and Human Services Department of Social Services Community Care Licensing Division. Referrals to Life Unlimited are made by Regional Center of Orange County (RCOC), which also acts as the funding agent of services for Life Unlimited participants. RCOC is the sole referral agency for Life Unlimited. The program does not serve the general public but rather a limited population of adults with physical and developmental disabilities that are first served by RCOC and are then referred to Life Unlimited. As such, the program works in conjunction with RCOC and other agencies to achieve various outreach opportunities.

Parenting Services provides individualized support and education to parents with intellectual and developmental disabilities needing assistance in learning how to provide a safe and nurturing environment for their children. Parenting Services are tailored to meet the needs of consumers in the following areas: accessing prenatal health care, preparing for labor and delivery, infant/toddler/child care, accessing benefits, identifying high risk issues, perinatal bonding, perinatal health care, health and safety education specific to child's age, infant/toddler/child development intervention, home safety, emergency planning, socialization, time management, case management, and advocacy. Parenting Services currently serves 14 consumers.

The Regional Center of Orange County (RCOC) provides oversight to Parenting Services through bi-annual audits. Referrals to Parenting Services are made by RCOC, which also acts as the funding agent of services for Parenting Services participants. RCOC is the sole referral agency for Parenting Services. The program does not serve the general public but rather a limited population of adults with developmental and intellectual disabilities that are first served by RCOC and are then referred to Parenting Services. As such, the program works in conjunction with RCOC and other agencies to achieve various outreach opportunities.

Work Activity Program (WAP) provides site-based services and skill training to consumers with barriers to competitive employment, including: remunerative wages commensurate with the consumer's level of productivity, vocational skill training, work adjustment, mobility and community transportation skill development, personal safety, accessing community resources, social skills development, personal hygiene and grooming, case management, advocacy, and progress assessments throughout the year. WAP currently provides services to approximately 170 consumers.

As of July 2014, RCOC no longer sends referrals to WAP in accordance with the Department of Labor's Employment First initiative; however, funding by RCOC for the program continues. The program does not serve the general public but rather a limited population of adults who have a qualifying disability or developmental disability that are first served by RCOC and are then referred to WAP. As such, the program works in conjunction with RCOC and other agencies to achieve various outreach opportunities.

Consumers in all of our programs have a wide range of diagnosis ranging from mild to profound intellectual or developmental disabilities. While it is beyond the scope of this program to measure specific literacy skills, consumers require a moderate to high level of supervision and have literacy skills ranging from no reading aptitude to approximately third grade reading abilities. It should be noted the predominate majority of consumers have little to no literacy skills. Generally, any documents presented to consumers are translated orally accompanied by the use of basic graphics or pictures due to the level of intellectual disability.

Given the relatively small size of the program and its limited exposure, the scope and provision of transportation service would not have a significant impact on the general public and minority and low-income populations in the geographic area. OCAAC, however, does maintain systems to gather stakeholder input regarding agency services and conducts public relations and outreach activities in order to create meaningful opportunities for public engagement as outlined in this plan.

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. OCAAC's Mission is "To make life better for people with disabilities." 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/or adverse human health or environmental effects on minority and/or low-income populations.

Summary of Outreach Efforts

The following is a summary of outreach efforts conducted by OCAAC as they relate to Title VI requirements under the Public Participation Plan. Many of OCAAC's 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.

Board Meetings

OCAAC's Board meetings are open to the public and are held every other month.

Orange County Emergency Management Services

OCAAC has received feedback from Orange County Emergency Management Services, American Red Cross, and the Regional Center of Orange County in the development of OCAAC's Emergency Plan. This plan specifically addresses the needs of populations at risk including disabled, minority and low-income. This partnership also includes a coordinated plan in which this agency will provide vehicles, transportation and shelter during evacuation emergencies.

High School Transition Fairs

OCAAC has a long history of active participation in transition fairs that are held on an annual basis by various school systems in Orange County. Transition fairs are designed to connect families of children with disabilities who are preparing to leave school and enter adulthood to service providers and training programs such as OCAAC. Examples of school districts offering annual transition fairs attended by OCAAC include: Anaheim, Buena Park, Garden Grove, Huntington Beach, Orange Unified, Saddleback Valley Unified, and Santa Ana. Transition fairs vary in size and typically attract 50-400 people. Translators are available during transition fairs to provide translation of information in multiple languages to individuals with limited English proficiency.

Chinese Parents Association For The Disabled – Orange County

OCAAC opens its facility to the Orange County Chinese Parents Association for the Disabled (CPAD) chapter on a monthly basis for meetings and other recreational activities. CPAD is a non-profit organization dedicated to help individuals with Autism, Down Syndrome, Cerebral Palsy and other developmental disabilities and their families to achieve a meaningful and productive life. CPAD serves minority populations.

RCOC - Homeless Individuals With Intellectual Disabilities

On occasion, OCAAC receives referrals from RCOC for low-income individuals with disabilities that are homeless and in need of services. OCAAC's services focuses on helping low-income and homeless consumers to find a suitable place to live by offering two living options: Family Connections and Independent Living Services.

Knights of Columbus

OCAAC has an on-going partnership with the Brea and Placentia/Yorba Linda Knights of Columbus. The Knights of Columbus provides philanthropic support to help low-income individuals gain economic security and help fund programs serving individuals with disabilities.

Multiple Foundations

OCAAC has formed partnerships with multiple corporate foundations that focus on providing philanthropic support for causes connected to low-income, minorities, the disadvantaged, and individuals with disabilities. The following corporate foundations have a partnership with OCAAC: The Allergan Foundation, Employee Community Fund of Boeing Corporation, The Carl E. Wynn Foundation, Fleur Employee Giving Campaign, George Hoag Family Foundation, The Lloyd E. & Elizabeth H. Klein Family Foundation, O.L. Halsell Foundation, and Sidney Stern Memorial Trust.

OCAAC Annual Consumer Awards Banquet

OCAAC hosts an annual Awards Ceremony and Banquet to recognize the achievements of both program participants and members of the community. This is a public event that is publicized and also serves as a forum for public input. This event typically attracts around 250 guests.

Annual Satisfaction Surveys

OCAAC distributes a Satisfaction Survey to stakeholders of the agency on an annual basis to determine their level of satisfaction and gain input regarding unmet needs. Stakeholders include but are not limited to: consumers, family members, care providers, funding agents (RCOC and DOR), legal representatives, spouses of consumers, and companies that employ consumers.

Angel Tree

Annually, OCAAC has an "Angel Tree" allowing employees and the public to support a child in need during the holidays. The child's parent has developmental disabilities and they do not have sufficient income to purchase Christmas gifts for their child. These events are publicized through the use of flyers and social media.

OCAAC's Website

OCAAC posts notices and announcement on the agency's website. Additional public input can be obtained by the Title VI Complaint Form, which is available as a download in English and Spanish.

Language Assistance Plan

Overview

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

- **Factor 1:** The number or proportion of LEP persons in the service area who may be served or are likely to encounter an OCAAC program, activity or service.
- **Factor 2:** The frequency with which LEP persons come in contact with an OCAAC program, activity or service.
- **Factor 3:** The nature and importance of programs, activities or services provided by OCAAC to the LEP population.
- **Factor 4:** The resources available to OCAAC and overall cost to provide LEP assistance.

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

Purpose of the Language Assistance Plan

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

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

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

The United States Department of Transportation (DOT) published guidance that directed its recipients to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for LEP customers. Orange County Adult Achievement Center's Language Assistance Plan (LAP) includes a four factor analysis and implementation plan that complies with the requirements of DOT LEP guidance.

Four Factor Analysis

Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by the Orange County Adult Achievement Center.

Orange County Adult Achievement Center (OCAAC) holds a unique position in regard to meeting the Title VI requirements. As a sub-recipient of FTA 5310 Grant funding, the agency's focus is primarily to transport adults with disabilities where current public transit options are insufficient or do not exist. Eligible participants or "riders" must be referred into the program from Regional Center Orange County (RCOC). As such, OCAAC does not offer transportation to the general public other than in situations involving a coordinated plan with other entities. Therefore, an analysis of public demographic data in Orange County does not represent actual populations served by this program *but is offered for comparison purposes only*.

There are two sources of data that most accurately represent LEP persons likely to be served by the program. The RCOC Expenditure Data for Fiscal Year 2015-16 provides information pertaining to RCOC purchase of service (POS) authorizations, expenditures and utilization by different demographic categories, including language. OCAAC maintains electronic information for each person served specific to ethnicity and their primary language. A historical analysis of this database in regard to language proficiency of all past and present participants will reflect actual proportions of LEP persons served.

American Community Survey

The U.S. Census Bureau 2015 American Community Survey (ACS) Language Spoken at Home by the Ability to Speak English for the Population 5 Years and Over estimates that of the 2,924,969 Orange County residents, 770,012 speak Spanish at home and 342,794 or 11.7% speak English less than "very well". 415,839 (or 14.2%) residents speak an Asian or Pacific Islander language.

Orange County, California	Estimate	Percentage
Total:	2,924,969	100%
Speak only English	1,587,426	54.3%
Spanish	770,012	26.3%
Speak English less than "very well"	342,794	11.7%

Source:

https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_15_5YR_B16001&prodType=table

Regional Center Orange County (RCOC) Expenditures

The RCOC Expenditure Data for Fiscal Year 2015-16 identifies total annual expenditures and authorized services purchased. The report shows expenditures for services by primary language spoken but does not ascertain whether English is also spoken "very well" or less than "very well". As indicated in the Orange County analysis above, Spanish is consistently the primary language for LEP populations. OCAAC would be included in this category as a provider of services that are purchased by RCOC.

The report indicates that authorized services in FY 2015-16 totaled \$291,600,000. The percentage of persons served receiving service coordination only by primary language was 15.6% English, 26.4% Spanish, 12.8% Korean, and 22.0% Vietnamese.

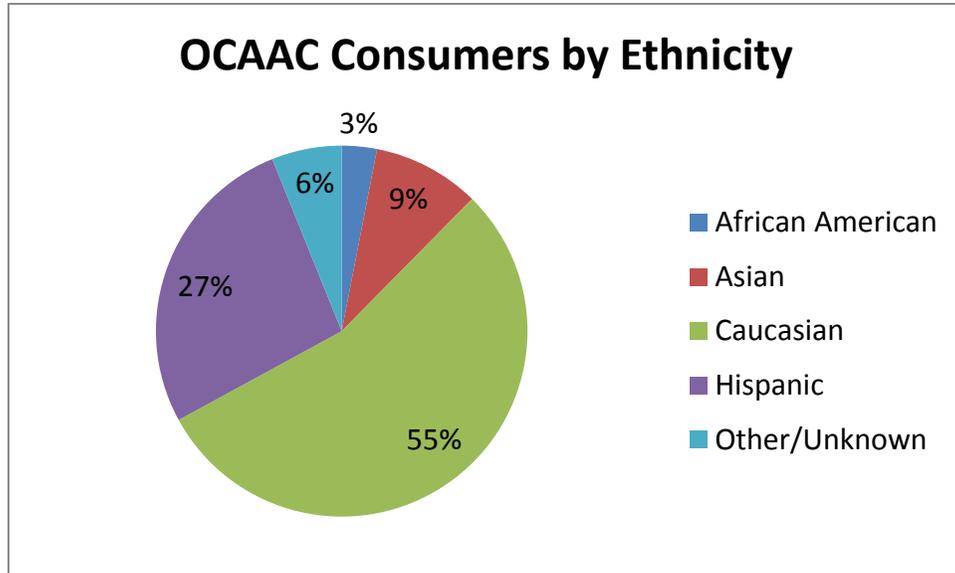
Authorized Services by Primary Language	Amount	Percent
Total Authorized Services Purchased	\$291,600,000	100%
English	\$45,489,600	15.6%
Spanish	\$76,982,400	26.4%

Source: <http://www.rcocdd.com/wp-content/uploads/2017/03/ENG-POS-Expenditure-Public-Meeting-03152017Rev031017.pdf>

By comparison, OCAAC's revenue received from RCOC in FY 2015-16 was \$6,658,633, which amounts to approximately **2.3%** of the total RCOC authorized services purchased. Theoretically, if this percentage were applied to the services purchased for Spanish speaking consumers, it would equate to the revenue necessary to provide service to **139** OCAAC consumers.

Historical Analysis of LEP Persons Served by OCAAC

A final source of data to be considered to determine the number of LEP persons likely to be served by this program is a consumer-by-consumer analysis of all OCAAC consumers. In FY 2015-16, the program served approximately 525 adults. Of that total, 27% are listed as Hispanic, 55% are listed as Caucasian, and 9% are listed as Asian. (See chart on next page)



Consumers of this program who speak English or any other language less than "very well" typically have developmental disabilities that cause barriers to speech or other forms of communication. **Limited English Proficiency is not present in this population solely due to a language barrier.** Thus, translation of vital documents into a native language is generally ineffective.

An examination of consumers who have exited the program reveals that consumers exited primarily for reasons such as aging, behavioral support needs, or they moved or transferred agencies. There were no consumers that were underserved or exited the program due to language barriers.

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

A survey of the agency's phone reception staff indicated calls from LEP persons are received only a few times a month. The staff indicated that these calls are primarily received from families of consumers or Regional Center coordinators rather than actual program participants (riders).

Translation services are provided by agency staff as appropriate during meetings with consumers. A fair majority of translation occurs with family members, not always consumers exclusively. Our staff is very capable to aid with such translation services.

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

The primary purpose of OCAAC's program is to provide training opportunities that foster personal growth for individuals with disabilities. Transportation to and from the program is offered daily as a part of the service through a third-party provider, Keolis Transit. Transportation for the program is an important part of the services offered for consumers.

The length of time an individual is typically enrolled in the program can range from a few months to many years. Consumers are not required to "graduate" and may remain in the program as long as their needs can continue to be met.

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

OCAAC's operating budget does not have a specific line item for providing language access and outreach. Outreach expenses as they relate to LEP populations are split among several departments depending on which department is responsible for the outreach. Expense for translation of documents is minimal and has not been quantified. We have a very diverse staff that is fluent in many languages, including Spanish, and are able to meet the translation needs of our consumers when needed. If there is a language we are not able to accommodate, we are able to contact the Regional Center for assistance.

SUMMARY

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

- It is likely that RCOC provided funding for **139 consumers** that spoke Spanish as a primary language in the 2015-16 fiscal year. English proficiency of this group is unknown.
- Language proficiency is primarily affected by disability rather than a language barrier alone.
- No consumers were underserved or exited the program due to language barriers.
- Surveyed reception staff reported very few LEP phone calls.
- Provision of transit services is an important aspect for our programs and our consumers.
- OCAAC does not have an LEP specific budget line, and expenses related to LEP are very minimal.

Language Assistance Implementation Plan

Methodologies

Identifying LEP Individuals

As evidenced by the Four Factor Analysis, very few "true" LEP individuals are referred to Orange County Adult Achievement Center (OCAAC). The predominant minority language in the region is Spanish. The consumers that are primarily served by OCAAC have disabilities that affect language proficiency rather than a language barrier alone. The agency does, however, have systems in place to provide access to minority populations.

Providing Services

While the agency does not currently have an on-going need for professional translation services, on-site agency staff fluent in Spanish provide translation services as needed. Documents that are offered in Spanish include:

- Title VI Notice to the Public
- Title VI Complaint Form
- Title VI Complaint Procedures
- Consumer Handbook
- Multiple documents informing staff of their responsibilities

Other documents can be translated to Spanish or orally as appropriate. Due to the low literacy rate of consumers at OCAAC, most documents are translated orally.

Communicating Availability of Language Assistance

Individuals who are referred to OCAAC are assigned a Program Coordinator who provides one-on-one guidance and program planning. Program Coordinators can offer Spanish translation services as needed. Agency reception staff can also offer translation services to guests and consumers' family members as appropriate.

Monitoring

OCAAC continually analyzes for trends and patterns that indicate a need for additional services. This analysis also serves as a guide to determine the need for additional translation services. The Title VI Plan will also be evaluated and updated every three years.

Employee Training

OCAAC provides initial training to new hires as well as annual training days for all staff that among other things, focuses on how to properly treat, respect and care for our consumers.

Safe Harbor Provision

The Federal Transit Authority Circular 4702.1B states:

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

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

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

As previously stated, Orange County Adult Achievement Center serves individuals with mild to profound developmental disabilities who require a high level of supervision. As such, the majority of consumers has very limited literacy skills and is unable to read or write. Program documents are generally interpreted orally by Program Coordinators.

Membership of Non-Elected Committees and Councils

Orange County Adult Achievement Center does not have a non-elected transit related advisory council at this time.

Title VI Equity Analysis

Orange County Adult Achievement Center does not have transit related facilities.

**Board of Directors Approval of Orange County Adult Achievement
Center's Title VI Program**

**A RESOLUTION OF THE ORANGE COUNTY ADULT ACHIEVEMENT CENTER
BOARD OF DIRECTORS AUTHORIZING THE TITLE VI COMPLIANCE PLAN
FOR THE AGENCY.**

WHEREAS, Orange County Adult Achievement Center desires to comply with Title VI of the Civil Rights Act of 1964, including new provisions detailed in U.S. Department of Transportation's FTA Circular 4702. Ib., "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 Orange County Adult Achievement Center 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 Orange County Adult Achievement Center in Orange County, State of California, on this 22nd day of June 2017.



Ed O'Hara
Chairman of the Board