

## **Title VI Complaint Policy and Procedures & Limited English Proficiency Plan Notification**

**Title VI** of the Civil Rights Act of 1964 prohibits discrimination on the basis of color, race or national origin. Community Senior Services (CSS) is committed to providing non-discriminatory services to ensure that no person is excluded from participation in, or is denied the benefits of services on the basis of race, color, national origin, or income. CSS also takes steps to ensure meaningful access to the benefits, services, information and other important portions of their programs and activities for Limited English Proficient ("LEP") persons.

**LEP persons** include those individuals whose primary language is not English and who have a limited ability to read, write, speak or understand English and have reported to the U.S. Census that they do not speak English well or do not speak English at all. A link to the CSS LEP Plan and the Title VI Procedures is included on the CSS website.

Any person or agency with internet access will be able to access and download the plan from the CSS website. Alternatively, any person or agency may request a copy of the plan via telephone, fax, mail, or in person and shall be provided a copy of the plan at no cost. LEP individuals may request copies of the plan in transition which CSS will provide if feasible.

Questions or comments regarding the LEP Plan may be submitted to Community Senior Services' President/CEO:

141 Spring Street  
Claremont, CA 91711  
(909) 621-9900  
Fax: (909) 621-9914  
Email: [cssfloy@linkline.com](mailto:cssfloy@linkline.com) (CSS President/CEO)

### **PROCEDURE FOR FILING A COMPLAINT**

If you believe you have been discriminated against, or that there has been a violation of any laws or regulations, or if you have a problem regarding services received, you have the right to file a grievance.

When a complaint or grievance is filed, the following will happen:

- CSS staff will contact you to meet to resolve the situation.
- Meeting will be documented in writing and all parties will receive a copy of the meeting notes.
- If the issue is resolved, no further actions will be taken.
- If no resolution is apparent, a formal, written complaint may be filed with:

Floy Biggs, President/CEO  
Community Senior Services

141 Spring Street  
Claremont, CA 91711  
(909) 621-9900 (phone)  
(909) 621-9914 (Fax)  
cssfloy@linkline.com (e-mail)

If a resolution of the situation is not apparent in a reasonable time, the complaint or grievance may be forwarded to: U.S. Department of Transportation, Federal Transit Administration, Office of Civil Rights. The regional office is located at Federal Transportation, Region IX 201 Mission Street, Suite 1650, San Francisco CA 94105-1839

## LIMITED ENGLISH PROFICIENCY (LEP) PLAN

### **Community Senior Services (CSS)**

This Limited English Proficiency (LEP) Plan has been prepared to address Community Senior Services responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, Federal Transit Administration Circular 4702.1A dated May 13, 2007, which state that no person shall be subjected to discrimination on the basis of race, color or national origin.

Executive Order 13166, titled Improving Access to Services for Persons with Limited English Proficiency, indicates that differing treatment based upon a person's inability to speak, read, write or understands English is a type of national origin discrimination. It directs each federal agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discrimination does not take place. This order applies to all state and local agencies which receive federal funds.

### **Plan Summary**

CSS is the operator of Community Connections. CSS has developed this LEP Plan to help identify reasonable steps for providing language assistance to persons with limited English proficiency who wish to access services provided by CSS. As defined in Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write or understand English. This plan outlines how to identify a person who may need language assistance, and the ways in which assistance may be provided.

In order to prepare this plan, CSS undertook the U.S. Department of Transportation (U.S. DOT) four-factor LEP analysis which considers the following factors:

1. The number or proportion of LEP persons in the service area who may be served or are likely to encounter a CSS program, activity or service.
2. The frequency with which LEP persons come in contact with CSS programs, activities or services.

3. The nature and importance of programs, activities or services provided by CSS to the LEP population.
4. The resources available to CSS and overall cost to provide LEP assistance.

### **LEP Assistance**

CSS assessed its available resources that could be used for providing LEP assistance, including determining how much a professional interpreter and translation service would cost on an as needed basis, which of its documents would be the most valuable to be translated if the need should arise, and taking an inventory of available organizations that CSS could partner with for outreach and translation efforts. The amount of staff and vehicle operating training that might be needed was also considered.

Based on the four-factor analysis, CSS developed its LEP Plan as outlined in the following section.

### **Limited English Proficiency (LEP) Plan**

#### **Limited English Proficiency (LEP) Plan Outline**

How CSS and staff may identify an LEP person who needs language assistance:

1. Examine records to see if requests for language assistance have been received in the past, either at meetings or over the phone, to determine whether language assistance might be needed at future events or meetings.
2. Have a staff person greet participants as they arrive to CSS sponsored events. By informally engaging participants in conversation it is possible to gauge each attendee's ability to speak and understand English.
3. Have Census Bureau Language Identification Flashcards available at CSS meetings. This will assist CSS in identifying language assistance needs for future events and meetings.

### **Language Assistance Measures**

There are numerous language assistance measures available to LEP persons, including both oral and written language services. There are also various ways in which CSS staff responds to LEP persons, whether in person, by telephone or in writing.

- Network with local human service organizations that provide services to LEP individuals and seek opportunities to provide information on CSS programs and services;
- Provide a bilingual staff at community events, public hearings and Board of Director meetings and on the Community Connections customer service phone lines.

- Placement of statements in notices and publications that interpreter services are available for these meetings, with seven day advance notice;
- Post the CSS Title VI Policy and LEP Plan on the agency website, [www.communityseniorservices.com](http://www.communityseniorservices.com);
- When an interpreter is needed, for a language other than Spanish, in person or on the telephone, staff will attempt to access language assistance services from a professional translation service or qualified community volunteers. A list of volunteers will need to be developed.

### **Staff Training**

The following training will be provided to CSS staff:

1. Information on the CSS Title VI Procedures and LEP responsibilities
2. Description of language assistance services offered to the public
3. Use of Language Identification Flashcards
4. Documentation of language assistance requests
5. How to handle a potential Title VI/LEP complaint

### **Outreach Techniques**

When staff prepares a document or schedules a meeting, for which the target audience is expected to include LEP individuals, then documents, meeting notices, flyers, and agendas will be printed in an alternative language based on the known LEP population. Interpreters will be available as needed.

### **Monitoring and Updating the LEP Plan**

CSS will update the LEP as required by U.S. DOT. At minimum, the plan will be reviewed and updated when data from the 2010 U.S. Census is available, or when it is clear that higher concentrations of LEP individuals are present in the CSS service area. Updates will include the following:

- The number of documented LEP person contacts encountered annually
- How the needs of LEP persons have been addressed
- Determination of the current LEP population in the service area
- Determination as to whether the need for translation services has changed
- Determine whether local language assistance programs have been effective and sufficient to meet the need

- Determine whether CSS' financial resources are sufficient to fund language assistance resources needed
- Determine whether CSS has fully complied with the goals of this LEP Plan
- Determine whether complaints have been received concerning CSS' failure to meet the needs of LEP individuals

**Dissemination of CSS LEP Plan**

A link to the CSS LEP Plan and the Title VI Procedures is included on the CSS website.

Any person or agency with internet access will be able to access and download the plan from the CSS website. Alternatively, any person or agency may request a copy of the plan via telephone, fax, mail, or in person and shall be provided a copy of the plan at no cost. LEP individuals may request copies of the plan in translation which CSS will provide, if feasible.

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