



**Dignity Health®**  
Connected Living

# **CONNECTED LIVING**

## **TITLE VI PROGRAM**

**DEVELOPED: SEPTEMBER 22, 2017**  
**APPROVED BY DIGNITY HEALTH BOARD OF DIRECTORS**  
**200 MERCY OAKS DRIVE, REDDING CA 96003**  
**530-223-6034**

This document was prepared by Connected Living 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.”

## **TABLE OF CONTENTS**

3-4	TITLE VI NOTICE TO THE PUBLIC NOTIFYING THE PUBLIC OF RIGHTS UNDER TITLE VI
5	WHAT IS TITLE VI OF THE CIVIL RIGHTS ACT OF 1964?
6	HOW TO FILE A TITLE VI COMPLAINT?
7	WHAT HAPPENS TO MY COMPLAINT AFTER IT IS SUBMITTED?
8	HOW WILL I BE NOTIFIED OF THE OUTCOME?
9	CLIENT COMPLAINT PROCESS
10-11	CONNECTED LIVING COMPLAINT FORM
12	LIST OF TRANSIT-RELATED TITLE VI INVESTIGATIONS, ETC.
13-15	CONNECTED LIVING PUBLIC PARTICIPATION PLAN ABOUT CONNECTED LIVING
15	SUMMARY OF OUTREACH EFFORTS
15	CONNECTED LIVING WEBSITE
16	LIMITED ENGLISH PROFICIENCY PLAN
17	INTRODUCTION PLAN SUMMARY
18	MEANINGFUL ACCESS: FOUR- FACTOR ANALYSIS
19	SAFE HARBOR PROVISION AND TRANSLATION OF DOCUMENTS LANGUAGE ASSISTANCE LANGUAGE MEASURES
20	MONITORING STAFF TRAINING AVAILABILITY OF THE CONNECTED LIVING LEP PLAN
21	MEMBERSHIP OF NON-ELECTED COMMITTEES AND COUNCILS EQUITY ANALYSIS
22	CONNECTED LIVING BOARD RESOLUTION <b>CONNECTED LIVING TITLE VI NOTICE TO THE PUBLIC</b>

## NOTIFYING THE PUBLIC OF RIGHTS UNDER TITLE VI

### Notifying the Public of Rights Under Title VI Connected Living

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 he or she has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with **Connected Living**.

For more information on **Connected Living's** civil right program and/or procedures to file please contact:

Staci Wadley ADA Compliance Coordinator

200 Mercy Oaks Drive

Redding, CA 96002

Phone: 530-226-3013

[staci.wadley@dignityhealth.org](mailto:staci.wadley@dignityhealth.org)

[connectedliving.org](http://connectedliving.org)

**Connected Living** notice to the public is posted at:

- 200 Mercy Oaks Drive, Redding CA 96003 – Administration – Receptionist desk
- Website – [connectedliving.org](http://connectedliving.org)
- Transit Vehicles 100 Mercy Oaks Drive, Redding CA 96003
- Transit Vehicles 37477 Main Street, Burney CA 96013
- Dining Facilities
  - 100 Mercy Oaks Drive, Redding CA 96003
  - 37477 Main Street, Burney CA 96013

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 530-226-3013.

Individuals who require auxiliary aids for effective communication in programs and services of **Connected Living** are invited to make their needs and preferences known to ADA Compliance Coordinator.

# NOTIFICACIÓN PARA EL PÚBLICO SOBRE LOS DERECHOS DEL TÍTULO VI

## Notificación al público de sus derechos bajo el título VI Dignity Health Connected Living

Realiza sus programas y servicios sin distinción de raza, color y origen nacional según el Título VI de la Ley de Derechos Civiles. Cualquier persona que crea que ha sido agraviado por cualquier práctica discriminatoria ilegal incluida en el Título VI puede presentar una queja en **Connected Living**.

Para más información sobre el programa de derechos civiles de **Connected Living** o los procedimientos de presentación, por favor póngase en contacto con:

Staci Wadley ADA Compliance Coordinator  
200 Mercy Oaks Drive Redding, CA 96002  
Teléfono: 530-226-3013  
staci.wadley@dignityhealth.org  
connectedliving.org

El aviso de **Connected Living** para el público se encuentra anunciado en:

- 200 Mercy Oaks Drive, Redding CA 96003. Mostrador de administración-recepción
- Página web – [connectedliving.org](http://connectedliving.org)

El demandante puede presentar una queja directamente ante la Administración Federal de Tránsito entregando una queja a la Oficina de Derechos Civiles

A la atención de: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590

Si necesita información en otro idioma, póngase en contacto con el 530-226-3013.

Las personas que requieran ayudas complementarias para la comunicación efectiva sobre los programas y servicios de **Connected Living** pueden informar de sus necesidades y preferencias al Coordinador de Cumplimiento ADA.

## **WHAT IS TITLE VI OF THE CIVIL RIGHTS ACT OF 1964?**

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.

**Connected Living** is committed to ensuring that no person is excluded from participation in, or denied benefits of, its transit services on the basis of race, color, or national origin, as protected by Title VI Federal Transit Administration (FTA) Circular 4702.1.A. If you believe you have been subjected to discrimination under Title VI, you may file a complaint.

## **¿CUÁL ES EL TÍTULO VI DE LA LEY DE DERECHOS CIVILES DE 1964?**

El Título VI de la Ley de Derechos Civiles de 1964 prohíbe la discriminación basándose en la raza, color y origen nacional en programas y actividades que reciban asistencia financiera federal.

**Connected Living** se compromete a garantizar que ninguna persona sea excluida de la participación en, o se le nieguen los beneficios de sus servicios de transporte debido a su raza, color u origen nacional, según protege el Título VI de la Administración de Tránsito Federal (FTA), circular 4702.1.A.

Si usted cree que ha sido sometido a una discriminación incluida en el Título VI, puede presentar una queja.

## HOW TO FILE A TITLE VI COMPLAINT?

You may file a signed, written complaint one hundred and eighty (180) days from the date of the alleged discrimination. The complaint should include the following information:

Your name, mailing address, and how to contact you (i.e., telephone number or email address); how, when, where and why you believe you were discriminated against. Include the location, names and contact information of any witnesses and other information that you deem significant. The complaint may be filed in writing with Connected Living at the following address:

**Connected Living**  
Title VI Coordinator  
200 Mercy Oaks Drive  
Redding, CA 96003  
By phone: (530) 223-6034  
By Facsimile: (530) 223-0658

**Note:** **Connected Living** encourages all complaints to certify all mail that is sent through the US Postal Service and/or ensure that all written correspondence can be tracked easily. For complaints originally submitted by facsimile or email, an original signed copy of the complaint must be mailed to the Title VI Coordinator as soon as possible, but no later than 180 days from the alleged date of discrimination.

## ¿CÓMO PRESENTAR UNA QUEJA DEL TÍTULO VI?

Usted puede presentar una queja por escrito firmada ciento ochenta días (180) desde la fecha de la supuesta discriminación. La queja debe incluir la siguiente información:

Su nombre, dirección postal y cómo ponerse en contacto con usted (es decir, número de teléfono o dirección de e-mail). Cómo, cuándo, dónde y por qué cree que usted fue discriminado. Incluya la ubicación, nombres e información de contacto de cualquier testigo u otra información que considere importante. La queja puede ser presentada por escrito a Golden Umbrella en la siguiente dirección:

**Connected Living**  
Title VI Coordinador  
200 Mercy Oaks Drive  
Redding, CA 96003  
Por teléfono: (530) 223-6034  
Por fax: (530) 223-0658

**Nota:** paraguas de oro anima a todas las quejas que certifiquen todo el correo que sea enviado a través de US Postal Service o se aseguren de que toda la correspondencia escrita pueda ser rastreada fácilmente. Para quejas enviadas originariamente por fax o por e-mail, se debe enviar por correo una copia original firmada de la queja al Coordinador del Título VI lo antes posible, pero no más tarde de 180 días desde la fecha de la presunta discriminación.

## WHAT HAPPENS TO MY COMPLAINT AFTER IT IS SUBMITTED TO CONNECTED LIVING?

All complaints alleging discrimination based on race, color or national origin in a service or benefit provided by **Connected Living** will be directly addressed by **Connected Living**. **Connected Living** shall also provide appropriate assistance to complaints, including those persons with disabilities or who are limited in their ability to communicate in English. Additionally, **Connected Living** shall make every effort to address complaints in an expeditious and thorough manner.

In instances where additional information is needed for investigation of the complaint, **Connected Living** will contact the complainant in writing. Please note that in responding to any requests for additional information, a complainant's failure to provide the requested information will result in administrative closure of the complaint.

Once sufficient information for investigation of the complaint is received by **Connected Living**, a written response will be drafted subject to review by **Connected Living's** attorney. If appropriate, **Connected Living's** attorney may administratively close the complaint. In this case, **Connected Living** will notify the complainant of the action as soon as possible.

## ¿QUÉ PASA CON MI QUEJA DESPUÉS DE QUE SE PRESENTE A CONNECTED LIVING?

Todas las quejas que aleguen discriminación debido a raza, color u origen nacional en un servicio o beneficio proporcionado por **Connected Living** será tratado directamente por **Connected Living**. **Connected Living** también proporcionará asistencia apropiada a las quejas, incluyendo a las personas con discapacidad o que tengan capacidad limitada para comunicarse en inglés. Además, **Connected Living** hará el máximo esfuerzo para tratar las quejas de manera rápida y minuciosa.

En los casos en los que se necesite información adicional para la investigación de la queja, **Connected Living** se pondrá en contacto con el demandante por escrito. Por favor, tenga en cuenta que para responder a cualquier solicitud de información adicional, si un denunciante no proporciona la información solicitada, dará como resultado el cierre administrativo de la queja.

Una vez **Connected Living** reciba información suficiente para la investigación de la queja, se redactará una respuesta por escrito sujeta a revisión por parte del abogado de **Connected Living**. Si es pertinente, el abogado de **Connected Living** podría cerrar administrativamente la queja. En este caso, **Connected Living** notificará la acción al denunciante lo antes posible.

## HOW WILL I BE NOTIFIED OF THE OUTCOME OF MY COMPLAINT?

**Connected Living** will send a final written response to the complainant and advise the complainant of his or her right to 1) appeal within 7 calendar days of receipt of the final written decision from **Connected Living** and/or 2) file a complaint externally with the U.S. Department of Transportation and/or the Federal Transit Administration. Every effort will be made to respond to Title VI complaints within 60 working days of receipt of such complaints, if not sooner.

In addition to the complaint process described above, a complainant may file a Title VI complaint with the following offices:

Office of Civil Rights  
Federal Transit Administration  
915 Second Avenue, Ste 3142  
Seattle, WA 98174  
Phone: 206-220-7954

Director  
FTA Office of Civil Rights  
East Building, 5<sup>th</sup> Floor  
1200 New Jersey Ave, SE  
Washington, DC 20590  
Fax: 206-220-7959

## ¿CÓMO SE ME NOTIFICARÁ EL RESULTADO DE MI QUEJA?

**Connected Living** enviará una respuesta final por escrito al demandante e informará al demandante acerca de su derecho a 1) apelar antes de 7 días desde la recepción de la decisión final escrita de **Connected Living** o 2) presentar una denuncia de forma externa al Departamento de Transporte de EE. UU. o la Administración Federal de Tránsito. Se realizará el máximo esfuerzo para responder a las quejas del Título VI antes de 60 días hábiles desde la recepción de tales quejas, si no antes.

Además del proceso de queja descrito anteriormente, el demandante puede presentar una queja de Título VI en las siguientes oficinas:

Office of Civil Rights  
Federal Transit Administration  
915 Second Avenue, Ste 3142  
Seattle, WA 98174  
Teléfono: 206-220-7954

Director  
FTA Office of Civil Rights  
East Building, 5<sup>th</sup> Floor  
1200 New Jersey Ave, SE  
Washington, DC 20590  
Fax: 206-220-7959



## **CLIENT COMPLAINT PROCESS**

Citizens may contact **Connected Living** to lodge a complaint or comment. All complaints and/or comments are put into a database, researched, followed-up and a response is made to the citizen. This process can be initiated by calling **Connected Living** at (530) 223-6034.

## **PROCESO DE QUEJAS DEL CLIENTE**

Los ciudadanos pueden contactar con **Connected Living** para presentar una queja o comentario. Todas las quejas y comentarios se guardan en una base de datos, se investigan, se siguen y se da una respuesta al ciudadano. Este proceso puede iniciarse mediante una llamada a **Connected Living** (530) 223-6034.

# CONNECTED LIVING COMPLAINT FORM

## Section I:

Name:

Address:

Telephone (Home):

Telephone (Work):

Electronic Mail Address:

Accessible Format

Requirements? (Circle one below)

Large Print

Audio Tape

TDD

Other

## Section II:

Are you filing this complaint on your own behalf?

Yes\*

No

*\*If you answered "yes" to this question, go to Section III.*

If not, please supply the name and relationship of the person for whom you are complaining:

Please explain why you have filed for a third party:

If you are filing on behalf of a third party, please confirm that you have obtained the permission of the aggrieved party.

Yes

No

## Section III:

I believe the discrimination I experienced was based on (check all that apply):

Race  Color  National Origin

Date of Alleged Discrimination (Month, Day, Year): \_\_\_\_\_

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. Please use additional paper and attach if needed:

# FORMULARIO DE QUEJA DE CONNECTED LIVING

## Sección I:

Nombre:

Dirección:

Teléfono (casa):

Teléfono (trabajo):

Dirección de correo electrónico:

¿Requisitos de formato accesible? (Rodee con un círculo uno de los siguientes)

Letras grandes

Cinta de Audio

TDD (dispositivo para sordos)

Otro

## Sección II:

¿Está presentando esta queja en su nombre?

Sí\*

No

*\* Si ha respondido "Sí" a esta pregunta, vaya a la Sección III.*

Si no es así, por favor proporcione el nombre y la relación con la persona por la que presenta la queja:

Explique por qué ha presentado una queja por un tercero:

Por favor, confirme que ha obtenido el permiso de la parte agraviada si presenta la queja en nombre de un tercero.

Sí

No

## Sección III:

Creo que la discriminación que he sufrido se basa en (marque todos los aplicables):

Raza  Color  Origen nacional

Fecha de la supuesta discriminación (mes, día, año): \_\_\_\_

Explique lo más claramente posible qué pasó y por qué cree usted que fue discriminado. Describa todas las personas que estuvieron involucradas. Incluya el nombre y la información de contacto de la persona o personas que le discriminaron (si las conoce), así como sus nombres y datos de contacto. Por favor, utilice papel adicional y anexos si es necesario:

## **LIST OF TRANSIT-RELATED TITLE VI INVESTIGATIONS, COMPLAINTS AND LAWSUITS**

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

# CONNECTED LIVING PUBLIC PARTICIPATION PLAN

## ABOUT CONNECTED LIVING

In July 2017, Shasta Senior Nutrition Program and Golden Umbrella merged to become Dignity Health Connected Living, a private non-profit agency, a subsidiary of Mercy Medical Center, and Dignity Health member. Animated by a spirit of compassion, caring and collaboration, we provide nutritious meals, adult daycare programs, case-management, social services, health-related services, in-home support services, financial management and assistance, representative payee services, transportation, supportive services and community impact volunteer opportunities that promote and enhance the physical, social and spiritual health of seniors and under-served families.

- **Senior Services and Resources:**  
**Connected Living** Advocates provide information, assistance and referrals, representative payee services and assistance with problem resolution. Telecare service provides telephone reassurance with a friendly call. Registry lists are available, which include names of potential caregivers or handymen workers. The Advocates work closely with other agencies and organizations to ensure the safety of participants and that all needed services are provided.

This program is available in Shasta County.

- **Senior Corps Programs Foster Grandparent Program (FGP) and Senior Companion Program (SCP):**  
These programs offer seniors age 55 and older and on a limited income an opportunity to assist children or other senior citizens. Participants are screened, trained and placed at volunteer stations. Participants receive \$2.65 an hour and mileage reimbursement, which is not taxed or considered income in order to qualify for other senior programs.

The Grandparents spend 15 to 40 hours a week working with children in various school settings, while the Senior Companions assist frail elderly in their homes.

These programs are available in Shasta, Siskiyou, Tehama and Trinity Counties.

- **Retired and Senior Volunteer Program (RSVP):**  
Provides a wide variety of opportunities for people 55 and over to make a difference in their community through volunteer service. Volunteer opportunities can include transportation, companionship, meal delivery to the homebound, frail seniors and disabled adults. RSVP offers maximum flexibility and choice, matching personal interests and skills of seniors with opportunities to help solve community issues. Supplemental insurance and mileage reimbursement are offered.

This program is available in Shasta, Siskiyou and Tehama counties.

- **Multi-Purpose-Senior Service Program (MSSP):**  
This is a Medi-Cal program funded through the Health Care Financing Administration in Washington D.C. and the Department of Health Care Services and the California Department of Aging. MSSP's goal is to help the frail elderly live an independent life of dignity at home delaying or preventing institutional placement. These seniors are 65 years of age or older and receive MediCal benefits.

This program serves Shasta, Lassen, Trinity and Siskiyou Counties.

- **Adult Day Programs:**  
Provides non-medical care to persons 18 years of age and older who need personal care services, supervision and assistance with daily living activities on less than a 24-hour basis. Meals, entertainment and activities are provided. Hours are 8:30 a.m. to 2:30 p.m., Monday through Friday.

This program serves Shasta County.

- **Adult Day Health Care:**  
Provides care, transportation, activities, physical, occupational and speech therapies, hot meal at lunchtime, therapeutic groups and family support. Any adult whose health problems are such that support services are needed to maintain independence is eligible to enroll.

For caregivers, we provide support groups, resources, education, guest speakers and encouragement. Help for planning for the future and the means to keep family members in their homes longer is our goal.

This program serves Shasta County.

- **Senior Transportation/CTSA/Lifeline:**  
Provides door-to-door service, Monday through Friday, for any person or persons 60 years of age or older, regardless of income, and mobility impaired persons 18 years of age or older and live outside the Demand Response service area. A twenty-four hour advance reservation is requested. Each vehicle is equipped with a wheelchair lift.

- **Meals On Wheels:**  
Seniors who are no longer able to prepare their own meals and have reached the age of 60 qualify, and a nutritious meal is delivered to their homes. Frozen meals are available on the weekends. This service provides personal daily contact to the frail elderly and helps prevent premature institutionalization.

- **Brown Bag Program:**  
Seniors who meet income guidelines are offered nutritious food monthly at Anderson, Burney, Happy Valley, Shasta Lake, Redding, Lakehead and Shingletown. Volunteers collect, warehouse and distribute food items that supplement seniors' diets.

- **Emergency Food Assistance:**  
This program offers a three day supply of food based on family size for emergency situations. Qualified families may receive assistance once a month only and must attend an informational class on nutrition, budgeting or cooking if they use the service for three consecutive months.
- **TEFAP- The Emergency Food Assistance Program:**  
The Shasta Senior Nutrition Program Food Bank distributes surplus commodities as available on a monthly basis to low-income families at one of 13 different distribution sites throughout Shasta County. Families must qualify under USDA income guidelines.

## **SUMMARY OF OUTREACH EFFORTS**

The following is a summary of outreach efforts conducted by **Connected Living** as they relate to Title VI requirements under the Public Participation Plan. Many of our activities are conducted in partnership or outreach with many 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.

- Website postings
- Community Need Assessments Committee (CNAC)
- Senior Round Tables and Committee Meetings in multiple counties
- Shasta Regional Transportation Advisory Committee public meetings
- CTSA meetings with local transit providers

## **CONNECTED LIVING WEBSITE**

Currently, **Connected Living** posts notices and announcements on the agency's website. Additional public input can be obtained by the Title VI Compliant Form, which is available as download in English and Spanish.

# **Limited English Proficiency Plan**

## **Connected Living**

### **September 22, 2017**

#### **TITLE VI COORDINATOR**

**Alan Masden**  
**200 Mercy Oaks Drive**  
**Redding, CA**  
**530-226-3013**



# INTRODUCTION

This **Limited English Proficiency Plan** has been prepared to address **Connected Living** responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English proficiency language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq, and its implementing regulations, 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 understand English is a type of national origin discrimination. It directs each 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 that receive federal funds, including all **Connected Living's** departments receiving federal grant funds.

## PLAN SUMMARY

Golden Umbrella has developed this **Limited English Proficiency Plan** to help identify reasonable steps for providing language assistance to persons with limited English proficiency (LEP) who wish to access services provided. As defined 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, the ways in which assistance may be provided, staff training that may be required and how to notify LEP persons where assistance is available.

In order to prepare this plan, **Connected Living** used the 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 by **Connected Living**.
2. The frequency with which LEP persons come in contact with **Connected Living** services.
3. The nature and importance of services provided by the **Connected Living** to the LEP population.
4. The interpretation services available to **Connected Living** and overall cost to provide LEP assistance. A summary of the results of the four-factor analysis is in the following section.

## MEANINGFUL ACCESS: FOUR-FACTOR ANALYSIS

1. **The number or proportion of LEP persons in the service area who may be served or are likely to require Connected Living services.**

**Connected Living** staff reviewed the 2010 U.S. Census Report and determined that of the 331,447 persons in the five counties that Golden Umbrella serves; Shasta 14,676 (8.2%), Tehama 12,107 (19.2%), Trinity 901 (6.7%), Siskiyou 4,511 (10.3%) and Lassen 5,628 (17.5%) 37,823 people speak a language other than English. In Shasta County, of those persons with limited English proficiency, 1,801 speak Spanish, 1,760 speak Asian languages of which 1,185 speak Miao-Yao and 575 speak Laotian, and 395 speak other Indo-European languages.

2. **The frequency with which LEP persons come in contact with Golden Umbrella services.**

The **Connected Living** staff reviewed the frequency with which the office staff have or could have had contact with LEP persons. This includes documenting phone inquiries or office visits LEP passengers to poll for a period of 1 month. To date, **Connected Living** has had no requests for interpreters and no requests for translated program documents. **Connected Living** staff has had very little contact with LEP persons.

3. **The nature and importance of services provided by Connected Living to the LEP population.**

There is no large geographic concentration of any type of LEP individuals in the service area for **Connected Living**. The overwhelming majority of the population speaks only English. As a result, there is little social, service, professional and leadership organizations within **Connected Living's** service area that focus on outreach to LEP individuals. **Connected Living's** office staff and drivers are most likely to encounter LEP individuals through phone conversations or email.

4. **The resources available to Connected Living and overall cost to provide LEP assistance.**

**Connected Living** reviewed its available resources that could be used for providing LEP assistance, which of its documents would be most valuable to be translated if the need should arise, and contacted local citizens that would be willing to provide Spanish translation, if needed, within a reasonable time period. Other language translation, if needed, would be provided by Shasta County Opportunity Center or Mercy Medical Center.

## SAFE HARBOR PROVISION AND TRANSLATION OF DOCUMENTS

Factor 1 analysis revealed that Spanish and Mien languages exceed the Safe Harbor Threshold. Vital documents for **Connected Living** include the Title VI Notice, Title VI Complaint Procedure and Form, and the **Connected Living** Intake form. **Connected Living** has translated the Title VI Notices, Title VI Complaint Procedure and Form into Spanish.

## LANGUAGE ASSISTANCE

A person who does not speak English as their primary language and who has a limited ability to read, write, speak or understand English may be a *Limited English Proficient* person and may be entitled to language assistance with respect to **Connected Living's** Language assistance. This assistance can include interpretation, which means oral or spoken transfer of a message from one language into another language and/or translation, and means the written transfer of a message from one language into another language.

How **Connected Living's** staff may identify an LEP person who needs language assistance:

- All **Connected Living's** staff would be provided with "I Speak" cards to assist in identifying the language interpretation needed if the occasion arises.
- All **Connected Living's** staff will be informally surveyed periodically on their experience concerning any contacts with LEP persons during the previous year.

## LANGUAGE ASSISTANCE MEASURES

Although there is a very low percentage in **Connected Living** of LEP individuals, that is, persons who speak English "not well" or "not at all," it will strive to offer the following measures:

1. **Connected Living** staff will take reasonable steps to provide the opportunity for meaningful access to LEP clients who have difficulty communicating English.
2. The following resources will be available to accommodate LEP persons:
  - Paid interpreters for 240+ languages through a telephone interpretation service, including Spanish, are available and will be provided within a reasonable time period.
  - **Connected Living's** website content pertaining to senior services will be translated into the LEP language that meet the four factor criteria for **Connected Living** service area: Spanish.
  - **Connected Living** telephone system prompts will be translated into both English and Spanish.
  - Spanish language assistance cards will be provided to individuals identified as LEP Spanish speaking clients.

## **MONITORING**

**Monitoring and Updating the LEP Plan- Connected Living** will update the LEP Plan every three years. 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 the **Connected Living** financial resources are sufficient to fund language assistance resources needed.
- Determine whether **Connected Living** fully complies with the goals of this LEP Plan.
- Determine whether complaints have been received concerning the agency's failure to meet the needs of LEP individuals.
- Maintain a Title VI complaint log, including LEP to determine issues and basis of complaints.

## **STAFF TRAINING**

**The following training is provided to all staff:**

- Information on the Title VI Policy and LEP responsibilities.
- Description of language assistance services offered.
- Use of the "I Speak" Cards.
- Documentation of language assistance requests.
- How to handle the potential Title VI/LEP complaint.
- Use of professional interpreter services from Shasta County Opportunity Center or Mercy Medical Center (over the phone interpretation provider).

## **AVAILABILITY OF THE CONNECTED LIVING LEP PLAN**

State on public notices in the language that LEP person would understand that documents are available in the language upon request at [www.goldenumbrella.org](http://www.goldenumbrella.org)

**MEMBERSHIP OF NON-ELECTED COMMITTEES AND COUNCILS:**

At this time Connected Living does not have any non-elected planning board.

**EQUITY ANALYSIS:**

At this time Connected Living does not use FTA funds for the construction or transit related facilities.