

Center for Elders' Independence



TITLE VI PROGRAM

Developed: 5.12.2023
Submitted for Approval by Center for Elders'
Independence Board of Directors
June 14, 2023

510 - 17th Street
Oakland, CA 94612
510.433.1150
www.cei.elders.org

INTRODUCTION

This document was prepared by Center for Elders' Independence 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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Center for Elders' Independence Title VI Notice to the Public

Notifying the Public of Rights Under Title VI

Center for Elders' Independence

- Center for Elders' Independence complies with applicable Federal civil rights laws and does not discriminate on the basis of race, color, national origin, age, disability, or sex. Center for Elders' Independence does not exclude people or treat them differently because of race, color, national origin, age, disability, or sex. Center for Elders' Independence provides:
- Free aids and services to people with disabilities to communicate effectively with us, such as: Qualified sign language interpreters
- Written information in other formats (large print, audio, accessible electronic formats, other formats)

Free language services to people whose primary language is not English, such as:

- Qualified interpreters
- Information written in other languages

If you need these services, contact Alice Ceruzzi, Compliance Officer.

Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with Center for Elders' Independence.

- For more information on Center for Elders' Independence civil rights program, and the procedures to file a complaint, contact 510.433.1150, or visit our administrative office at 510 – 17th Street, Oakland, CA 94612. For more information, visit compliance@cei.elders.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 510.433-1150.

Notificar al público de los derechos bajo el título VI

Center for Elders' Independence

- Center for Elders' Independence no excluye a las personas ni las trata de manera diferente debido a su raza, color, origen nacional, edad, discapacidad, o sexo. Center for Elders' Independence no excluye a las personas ni las trata de manera diferente debido a su raza, color, origen nacional, edad, discapacidad, o sexo.

Center for Elders' Independence ofrece:

Ayudas y servicios gratuitos a las personas con discapacidad para comunicarse con nosotros de manera eficaz, tales como:

- Intérpretes calificados de lenguaje de señas
- Información escrita en otros formatos (letra grande, audio, formatos electrónicos accesibles, otros formatos)

Servicios de idiomas sin costo a personas cuyo idioma principal no es el inglés, tales como:

- Intérpretes calificados
- Información escrita en otros idiomas

Si usted necesita estos servicios, comuníquese con Alice Ceruzzi, Compliance Officer. .

- Para obtener más información sobre el programa derechos civiles capaz de industrias y el procedimientos para presentar una queja, llame al (559) 651-8150, o visite nuestra oficina administrativa en 510 – 17th Street, Oakland, CA 94612. Para más información información, visite compliance@cei.elders.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 510.433.1150.

List of Locations Where Title VI Notice Is Posted

Center for Elders' Independence notice to the public is currently posted at the following locations:

Location Name	Address	City
CEI Berkeley PACE Center	1497 Alcatraz Ave.	Berkeley, CA
CEI Downtown Oakland Clinic	1955 San Pablo Ave.	Oakland, CA
CEI Downtown Oakland Center	510-17 th Street	Oakland, CA
CEI East Oakland PACE Center	7200 Bancroft Ave., Suite 188	Oakland, CA
CEI San Leandro PACE Center	1850 Fairway Drive	San Leandro, CA
CEI Concord PACE Center	1465 Civic Court	Concord, CA
CEI Administrative Headquarters	510-17 th Street	Oakland, CA
5310 vehicles	1601 Poplar Street	Oakland, CA

The Title VI notice and program information is also provided on Center for Elders' Independence website at www.cei.elders.org

Title VI Complaint Procedures

As a recipient of federal dollars, Center for Elders' Independence 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. Center for Elders' Independence 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, national origin, age, disability, or sex by Center for Elders' Independence may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form. Center for Elders' Independence investigates complaints received no more than 180 days after the alleged incident. Center for Elders' Independence will only process complaints that are complete.

Within 10 business days of receiving the complaint, Center for Elders' Independence 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. Center for Elders' Independence 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, Center for Elders' Independence 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 Center for Elders' Independence 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.

Center for Elders' Independence Title VI Complaint Form

COMPLAINT FORM

Section I: Please write legibly		
1. Name:		
2. Address:		
3. Telephone:	3.a. Secondary Phone (Optional):	
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 (check all that apply):		
<input type="checkbox"/> Race	<input type="checkbox"/> Color	<input type="checkbox"/> National 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.		

Center for Elders' Independence Title VI Complaint Form, Page 2**COMPLAINT FORM**

Section IV:		
14. Have you previously filed a Title VI complaint with Center for Elders' Independence?	YES	NO
Section V:		
15. Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court? [] YES* [] NO If yes, check all that apply: [] Federal Agency _____ [] State Agency _____ [] Federal Court _____ [] Local Agency _____ [] State Court _____		
16. If you answered "yes" to #15, provide information about a contact person at the agency/court where the complaint was filed.		
Name:		
Title:		
Agency:		
Address:		
Telephone:		Email:
Section VI:		
Name of Transit Agency complaint is against:		
Contact Person:		
Telephone:		

You may attach any written materials or other information that you think is relevant to your complaint.

Signature and date are required below to complete form:

Signature _____ Date _____

Please submit this form in person or mail this form to the address below:

Center for Elders' Independence, Compliance Officer
510 – 17th Street
Oakland, CA 94612

Titulo VI Procedimiento de Queja

Como un receptor de dólares federales, Center for Elders' Independence tiene que cumplir con lo dispuesto en el Título 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. Center for Elders' Independence ha puesto en marcha un procedimiento de queja Título VI, que emboza un proceso de disposición local de quejas del Título 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 motivos de raza, color, u origen nacional por Center for Elders' Independence puede presentar al Título VI su denuncia. Center for Elders' Independence investiga las quejas no mas de 180 días después del incidente. Center for Elders' Independence solo tramitara las quejas que están completas.

En un periodo de 10 días de haber recibido la demanda, Center for Elders' Independence 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 Center for Elders' Independence tiene 30 días para investigar la queja.

Si necesita mas información para resolver el caso, Center for Elders' Independence 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.

FORMA DE QUEJA

Seccion I: Escribir en forma legible		
1. Nombre:		
2. Direccion:		
3. Telefono:	3.a. Telefono secundario(<i>opcional</i>):	
4. Direccion de correo electronico:		
5. Reuistos de forma accesible?	<input type="checkbox"/> Impresion grande	<input type="checkbox"/> Cinta de audio
	<input type="checkbox"/> TDD	<input type="checkbox"/> Otros
Seccion II:		
6. Esta presentando esta queja en su propio nombre?	Si	No
*Si usted contesto "Si" to #6, vaya a la Seccion III.		
7. If you answered "no" to #6, what is the name of the person for whom you are filing this complaint? Name:		
8. Cual es su relacion con este individuo:		
9. Por favor, explique por que han presentado para una tercera parte:		
10. Por favor, confirme que ha obtenido el permiso de la parte agraviada en el archivo en su nombre.	Si	No
Seccion III:		
11.Creo que la discriminacion que he experimentado fue basado en (<i>marqu todas las que correspondan</i>):		
<input type="checkbox"/> Raza	<input type="checkbox"/> Color	<input type="checkbox"/> Origin nacional
12. Fecha de supuesta discriminacion: (<i>mm/dd/aaaa</i>)		
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. 14. Anteriormente ha presentado un Titulo VI denuncia con la Center for Elders' Independence.	Si	No
Seccion V:		
15. Ha presentado esta queja con cualquier otro local, estado o federal, o con cualquier Federal o Estado?		
[] Si* [] No si la respuesta es si		
Marque todo lo que aplica		
[] Agencia Federal _____	[] Agencia Estatal _____	
[] Federal Tribunal _____	[] Agencia Local _____	
[] Tribunal Estatal _____		
16. Si usted contesto "si" a la posicion #15, proporcionan informacion acerca de una persona de contacto en la agencia/tribunal donde se presento la denuncia.		
Nombre:		
Titulo:		
Organismo:		
Direccion:		
Telefono:		Correo electronico:
Seccion VI:		
Nombre de organismo Transito denuncia es contra:		
Persona de contacto:		
Telefono:		

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

Center for Elders' Independence has not been involved in any transportation-related Title VI investigations, lawsuits or complaints.

Center for Elders' Independence 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 Center for Elders' Independence

Center for Elders' Independence (CEI) is a Program of All-inclusive Care for the Elderly (PACE), a managed health care plan that provides medical and social services to frail, chronically ill, medically complex adults age 55 and over. The PACE model uses an interdisciplinary team to provide comprehensive, integrated, coordinated care and case management aimed at keeping seniors living in the community and out of nursing homes for as long as medically and socially feasible. Care teams at each PACE Center consist of physicians; nurse practitioners; clinic and home care nurses; social workers; dietitians; physical, occupational, and speech therapists; activity/recreation therapists; geriatric aides; transportation drivers. The teams meet often to discuss and implement participant care plans, which are developed jointly with the participant and family caregivers.

This cost-effective approach is designed to optimize health, quality of life, and autonomy for chronically ill seniors and to offer support/respite/education for their family caregivers. It is considered the Gold Standard for senior health care and was emulated by the provisions of the Affordable Care Act health care reform.

CEI's transportation services are an integral part of the PACE model. CEI staff drivers transport our participants between their homes and the PACE centers, and to and from outside specialist appointments, hospital admissions/discharges, etc. CEI does not offer transit services to the public, nor operate a fixed route system. This agency, 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 below.

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 "provide high quality, affordable, integrated health care services to the elderly, which promote autonomy, quality of life, and the ability of individuals to live in their communities." At every opportunity, CEI solicits input from stakeholders in order to best support persons served without creating disproportionately high and adverse human health or environmental effects on minority and/or low-income populations.

Summary of Outreach Efforts

CEI conducts extensive, ongoing outreach activities throughout our service area. CEI markets to seniors, their families, and other service providers through in-person presentations at venues such as senior centers, residential facilities, community organizations, and other agencies that serve or refer seniors; public events; referral/directory listings; and media outreach. We advertise in senior publications; African American, Spanish and Chinese language publications; Chinese and Spanish language streaming TV and social media platforms. CEI has received favorable coverage in many articles and programs during our 30 years as a PACE provider.

The following is a summary of outreach efforts conducted by Center for Elders' Independence 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.

1. CEI staff partners with local government commissions on aging (Oakland, San Leandro, etc.) to inform and amplify their outreach efforts to constituents; and participates in Age-Friendly Oakland initiatives. CEI also participates in Oakland's annual Older Americans Month celebration in May with an information booth and demonstration class.
2. CEI coordinates with the Alameda County Office of Homeland Security and Emergency Services by providing a list of our vehicles and their capacities in case they are needed in an area-wide disaster. This partnership includes a coordinated plan in which this agency will provide vehicles, transportation and shelter during evacuation emergencies. Our Transportation Training/Fleet Coordinator has spoken with County OES staff regarding ways in which our lift-equipped vehicles could be used as a resource in emergency evacuations or for training purposes. CEI transportation staff has also attended MTC's Critical Transportation Regional Tabletop Exercise.
3. CEI staff attends and participates in the Alameda County social service transportation planning process – staff attends joint meetings of the Paratransit Advisory Planning and Technical Advisory Committees.
4. CEI participates in the annual Healthy Living Festival presented by United Seniors of Oakland and Alameda County.
5. CEI partners with University of California, Berkeley, to train the next generation of doctors and nurses to go into geriatric care. Medical and nursing students spend a rotation in our PACE centers learning about our team-based approach to caring for diverse frail, low-income seniors.
6. CEI conducts Annual Satisfaction Surveys with program participants and their caregivers to determine level of satisfaction and gain input regarding unmet needs.
7. Every two years, CEI partners with On Lok Lifeways to present the Bay Area Senior Health Policy Forum, which brings together advocates, providers, policymakers and

stakeholders to inform policy and create a healthy aging environment in the Bay Area. We also partner with On Lok Lifeways on planning and hosting the yearly CA Master Plan on Aging event for the Bay area. Co sponsors were Alzheimer's association, Family Caregiver Alliance and Contra Costa County Commission on Aging

8. CEI's fund development department and supporting foundation raise funds for projects that enhance our services, including: the Language Bridge Fund, which purchases handheld translation devices and trains staff to use them for communication with participants who speak a language other than English; WebLinks Program, which trains seniors to use the Internet and provides each program graduate with an iPad; Helping Hands Emergency Assistance Fund, which provides help in situations that might compromise a participant's health, such as home safety improvements, rental deposits for safe housing, or replacing vital possessions damaged in a fire or flood.
9. The CEI Board of Directors has a Professional Medical Advisory Committee composed of community health care professionals who donate their time and expertise. This committee is chaired by a board member and it advises the board on matters of best practices, ethics, end-of-life care, policies and procedures.
10. Multiple in-person presentations made at the following:
 - Senior residential facilities, including several for Asian American elders
 - Churches, including Oakland Chinese Christian Church
 - Senior/community centers, including Vietnamese Community Center
 - Business/fraternal organizations
 - Social/health service agencies, including Asian Community Mental Health Services
 - Government (city, county) agencies
11. Listings in a printed resource directory, and in multiple online and telephone referral services
12. Open House events are held when we open a new PACE center (most recently in Concord). These are open to the public and are publicized with press releases to a number of various media outlets. They introduce the community to the services available to frail, low-income, LEP seniors through PACE.
13. Ads and articles in newspapers and magazines, including Vision Hispana, Sing Tao Daily, and the Oakland Post (African American weekly)
14. Ads in public buses, outdoor billboards, and bus shelters
15. Social media posts (Facebook, Instagram, LinkedIn, Twitter and TicToc) and digital marketing campaigns
16. Blog posts with information for seniors and their caregivers on CEI's website

Most of the above activities are carried out or coordinated by the Communications Department staff, which sets annual marketing and outreach goals, and develops a comprehensive strategic marketing plan.

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 the Center for Elders' Independence (CEI) Program of All-inclusive Care for the Elderly (PACE) program, activity or service.
- **Factor 2:** The frequency with which LEP persons come in contact with CEI-PACE program, activity or service.
- **Factor 3:** The nature and importance of programs, activities or services provided by CEI-PACE to the LEP population.
- **Factor 4:** The resources available to CEI-PACE 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. Center for Elders' Independence 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 Center for Elders' Independence.

CEI's service area covers central and northern Alameda County and all of Contra Costa County. According to U.S. Census data, 43% of residents in our service area speak a language other than English at home and 30% are foreign-born. Among the Medi-Cal population in these two counties, the threshold languages (spoken by at least 5% of Medi-Cal recipients) are Spanish, Vietnamese, Cantonese and Mandarin Chinese. All of CEI's participants are low-income Medi-Cal beneficiaries.

Currently enrolled CEI participants speak 23 different languages – 59% have a primary language other than English and need interpreters for clear oral communication and translations of written materials. Primary languages spoken by CEI participants are: Chinese (Mandarin, Cantonese, or other dialect), 32%; Spanish, 15%; Korean 5%; Tagalog 2%; Vietnamese 3%; others, less than 1% each. CEI's current 1,080 participants are 41% Asian/Pacific Islander; 30% African American; 15% Latino; 13% White; 1% Native American.

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

CEI actively markets to frail seniors age 55 and over, through in-person presentations at venues such as a Vietnamese Community Center, residential facilities for Chinese seniors, and Hispanic organizations; and via media outreach. We advertise in Spanish and Chinese language publications and cable TV stations, and have received favorable coverage in many articles and programs. These ethnic media have a high penetration rate within their communities.

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

CEI-PACE is a long-term care safety-net program that serves the most vulnerable, frail, low-income seniors in the East Bay. Research has shown that PACE participants nationwide are healthier, live longer, spend fewer days in hospitals, and are more satisfied with life and their health care plan than comparable non-PACE seniors. Prospective enrollees often tell Intake staff that they have not been able to access health care services in the community at large due to language barrier issues and/or lack of transportation, thus endangering their health. PACE provides culturally competent care in the languages our participants understand. Without our comprehensive community-based health care and social services, including transportation, many would need to move to nursing homes at greater expense to the State.

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

CEI is a capitated health plan. We receive a set monthly payment from Medicare and/or Medi-Cal for each enrolled member, for which we are required to provide all needed medical and social services, including some that are not available through traditional Medicare/Medi-Cal. We allocate a portion of that revenue for outreach/marketing activities and LEP services, including hiring bilingual staff (who receive a pay premium for their language skills); contracting with interpreters (in-person and online/telephonic); purchasing handheld translation devices (through donations to our supporting foundation); and translating and printing written materials into multiple languages. Estimated annual cost for all LEP services is approximately \$700,000.

SUMMARY

The results of the Four Factor Analysis can be summarized as follow: The majority of CEI participants speak a language other than English. To ensure clear communication and effective healthcare for them, CEI uses a variety of strategies, including hiring bilingual staff; contracting with interpreters (in-person and online/telephonic); purchasing handheld translation devices and training staff to use them; translating our written materials into multiple languages, including Spanish and Chinese versions of our website; and advertising in vernacular media/publications.

CEI's brochure, information handouts about our services, enrollment forms, and the member handbook have been translated and printed in the Medi-Cal "threshold" languages for our service area: English Spanish, Chinese, and Vietnamese. We also print these documents in Korean and some are also available in Tagalog and Hindi. This exceeds the Title VI requirement for our area and agency size, which only requires Spanish translations.

Language Assistance Implementation Plan

Methodologies

Identifying LEP Individuals

As evidenced by the Four Factor Analysis, the majority of Center for Elders' Independence participants identify themselves to us as speaking a primary language other than English and CEI makes substantial efforts to ensure that they receive services in the language they understand. We reach out to and work with local agencies that serve diverse ethnic communities to let them know we can serve their clients' language needs. These agencies often refer their PACE-eligible clients to CEI.

Providing Services

As noted above, CEI provides services and written materials in multiple languages via interpreters (in-person or online), bilingual staff, and translated documents. Regarding Title VI specifically, documents that are offered in Spanish include:

- Title VI Notice to the Public
- Title VI Complaint Form
- Title VI Complaint Procedures
- Member Handbook including Grievance Policy and procedures
- Agency website Title VI information

Other documents can be translated orally or in writing as appropriate.

Communicating Availability of Language Assistance

Individuals who enroll in Center for Elders' Independence are assigned a Social Worker who provides one-on-one guidance. Social workers can offer services in other languages as needed, using interpreters, handheld devices, and written translations as needed. Agency reception staff can also offer translation services to participants and their family members as appropriate.

The agency website also contains summary information in Spanish and Chinese with instructions on how to obtain more information in other languages, as well.

Monitoring

- Activity Coordinators review Monthly Activity Calendars to ensure cultural diversity.
- Director of Communication ensures that Marketing Department is aware of changes in the threshold language needs.
- All program related policies and procedures are reviewed annually the Director of Compliance, and any other relevant management/ leadership staff. Documents are revised as needed to meet all applicable regulations.
- Satisfaction Surveys for the program offer an opportunity for consumers and their caregivers to provide input or suggest additional services. The Title VI Plan will also be evaluated and updated as required by the 5310 Program.

Employee Training

- CEI conducts mandatory annual cultural sensitivity/diversity training for all staff.

- Introduction to the availability of translated materials and interpreter services is part of new-hire orientation for all departments.
- Written protocols instruct staff on how to access these services.

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, the Center for Elders' Independence brochure, information handouts about our services, enrollment forms, and the member handbook have been translated and printed in the Medi-Cal "threshold" languages for our service area: Spanish, Chinese, Vietnamese, and English. We also print these documents in Korean and some are also available in Tagalog and Hindi. This exceeds the Title VI requirement for our area and agency size, which only requires Spanish translations.

Membership of Non-Elected Committees and Councils

Center for Elders' Independence does not have a non-elected transit related advisory council. [Note: Our agency's volunteer board of directors includes African Americans, Asian Americans and our Latina CEO. We also have a Professional Medical Advisory Committee composed of community health care professionals who donate their time and expertise.]

Title VI Equity Analysis

Center for Elders' Independence does not have transit related facilities.

Board of Directors Approval of Center for Elders' Independence Title VI Program

A RESOLUTION OF THE Center for Elders' Independence BOARD OF DIRECTORS AUTHORIZING THE TITLE VI COMPLIANCE PLAN FOR THE AGENCY.

WHEREAS, Center for Elders' Independence 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 4702.1B, "Title VI Requirement and Guidelines for Federal Transit Administration Recipients,"

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

NOW, THEREFORE BE IT RESOLVED, by the Board of Directors of Center for Elders' Independence 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 Center for Elders' Independence, State of California, on this 15th day of June, 2023.

Florence Raskin

President of the Board