

**COMMUNITY PARTNERS IN CARING  
TITLE VI PLAN**

**Title VI of the Civil Rights Act of 1964**

**ADOPTED AUGUST 22,  
2014**

Contact Information:  
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## TITLE VI PLAN

### I. PLAN STATEMENT

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that "no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance" (42 U.S.C. Section 2000d).

Community Partners in Caring is committed to ensuring that no person is excluded from participation in, or denied the benefits of its services on the basis of race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1.B.

This plan was developed to guide Community Partners in Caring in its administration and management of Title VI-related activities.

Title VI Coordinator Contact information:

**Vilma Contreras, Executive Director**  
**Community Partners in Caring**  
**120 East Jones Street, Suite 123**  
**Santa Maria, CA 93454**

### II. TITLE VI INFORMATION DISSEMINATION

Title VI information posters shall be prominently and publicly displayed in Community Partners in Caring's facility. The name of the Title VI coordinator is available on Community Partners in Caring's website, at [www.partnersincaring.org](http://www.partnersincaring.org). Additional information relating to nondiscrimination obligation can be obtained from Community Partners in Caring's Executive Director the Title VI Coordinator.

Title VI information shall be disseminated to Community Partners in Caring employees annually via the Employee Education form (see Appendix A) at the beginning of the calendar year. This form reminds employees of Community Partners in Caring policy statement, and of their Title VI responsibilities in their daily work and duties.

During New Employee Orientation, new employees shall be informed of the provisions of Title VI, and the Community Partners in Caring expectations to perform their duties accordingly.

All employees shall be provided a copy of the Title VI Plan and are required to sign the Acknowledgement of Receipt (see Appendix B).

### III. SUBCONTRACTS AND VENDORS

All subcontractors and vendors who receive payments from Community Partners in Caring where funding originates from any federal assistance are subject to the provisions of Title VI of the Civil Rights Act of 1964 as amended.

Written contracts shall contain non-discrimination language, either directly or through the bid specification package which becomes an associated component of the contract.

#### **IV. RECORD KEEPING:**

The Title VI Coordinator will maintain permanent records, which include, but are not limited to, signed acknowledgements of receipt from the employees indicating the receipt of the Community Partners in Caring Title VI Plan, copies of Title VI complaints or lawsuits and related documentation, and records of correspondence to and from complainants, and Title VI investigations.

#### **V. TITLE VI COMPLAINT PROCEDURES How to file a Title VI Complaint?**

The complainant may file a signed, written complaint up to thirty (30) 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, email address, etc.).
- How, when, where and why you believe you were discriminated against. Include the location, names and contact information of any witnesses.
  - Other information that you deem significant.

The Title VI Complaint Form (see Appendix C) may be used to submit the complaint information. The complaint may be filed in writing with Community Partners in Caring at the following address:

**Vilma Contreras, Executive Director**  
**Community Partners in Caring**  
**120 East Jones Street Suite 123**  
**Santa Maria, CA 93454**

NOTE: Community Partners in Caring encourages all complainants to certify all mail that is sent through the U.S. Postal Service and/or ensure that all written correspondence can be tracked easily. For complaints originally submitted by facsimile, an original, signed copy of the complaint must be mailed to the Title VI Coordinator as soon as possible, but no later than 30 days from the alleged date of discrimination.

#### **What happens to the complaint after it is submitted?**

All complaints alleging discrimination based on race, color or national origin in a service provided by Community Partners in Caring will be directly addressed by the Executive Director. Community Partners in Caring shall also provide appropriate assistance to complainants, including those persons with disabilities, or who are limited in their ability to communicate in English. Additionally, Community Partners in Caring's Executive Director shall make every effort to address all complaints in an expeditious and thorough manner.

A letter of acknowledging receipt of complaint will be mailed within thirty (30) days (Appendix D). Please note that in responding to any requests for additional information, a complainant's failure to provide the requested information may result in the administrative closure of the complaint.

**How will the complainant be notified of the outcome of the complaint?**

Community Partners in Caring will send a final written response letter (see Appendix E or F) to the complainant. In the letter notifying complainant that the complaint is not substantiated (Appendix F), the complainant is also advised of his or her right to 1) appeal within seven calendar days of receipt of the final written decision from Community Partners in Caring, and/or 2) file a complaint externally with the U.S. Department of Transportation and/or the FTA. 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:

**Federal Transit Administration Office of Civil Rights  
Attention: Title VI Program Coordinator  
East Building, 5th Floor – TCR  
1200 New Jersey Ave., SE Washington, DC 20590**

**VI. LIMITED ENGLISH PROFICIENCY (LEP) PLAN**

Community Partners in Caring (CPIC) has developed a Limited English Proficiency Plan (LEP) to help identify reasonable steps to provide language assistance for LEP persons seeking meaningful access to CPIC services as required by Executive Order 13166. A Limited English Proficiency person is one who does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English. This plan has detailed procedures on how to identify a person who may need language assistance, the ways in which assistance may be provided, training staff, how to notify LEP persons that assistance is available, and information for future plan updates. In developing the plan to determine the extent of obligation to provide LEP services, CPIC analyzed the U.S. Department of Transportation four factor LEP, which considers the following: 1) The number or proportion of LEP persons to be served or likely to be encountered in a CPIC program, activity, or service; 2) the frequency with which LEP individuals come in contact with CPIC programs; 3) the nature and importance of programs, activities or service provided by CPIC to the LEP population; and 4) the resources available to CPIC and overall costs to provide LEP assistance.

**VII. COMMUNITY OUTREACH**

As an agency receiving federal financial assistance, we have made the following community outreach efforts:

Community Partners in Caring attends and outreaches at health, family, and senior fairs throughout the year. CPIC also holds monthly meeting that are open to the public. At these meetings the public is welcome to attend and share in discussion with a variety of topics.

Community Partners in Caring receives from the California Department of Transportation and Federal Transit Administration an annual allocation for Federal Transit Administration (FTA) Section 5317 revenue. In addition, Community Partners in Caring submits grant requests for FTA Section 5317 revenue.

## **VIII. ACTIVE INVESTIGATION, LAWSUIT OR COMPLAINT**

Community Partners in Caring has had no active investigations, lawsuits or complaints alleging discrimination on the basis of race, color or national origin.

## **IX. SUBRECIPIENTS MONITORING**

Primary recipients shall ensure subrecipients are complying with Title VI. Subrecipient Title VI program shall be submitted every three years in line with the primary recipients program. Subrecipients will also submit annual complaint logs to primary recipient which will be kept in an electronic storage device for further review by FTA as necessary.

## **X. BOARD DEMOGRAPHICS**

CPCI board members are comprised of nine (9) members. Please see Appendix H for table with their ethnicity.

## **XI. EQUITY ANALYSIS FOR BUILDING SITE**

We do not own our own building. Therefore, this does not apply.

## **XII. RESOLUTION APPROVING TITLE VI PLAN**

A copy of this resolution can be found in Appendix I of this Plan.

## **Appendix A Employee Annual Education Form**

### **Title VI Policy**

No person shall, on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.

All employees of Community Partners in Caring are expected to consider, respect, and observe this policy in their daily work and duties. If a citizen approaches you with a question or complaint, direct him or her to the Executive Director, who is the Title VI Coordinator.

In all dealings with citizens, use courtesy titles (i.e. Mr., Mrs., Ms., or Miss) to address them without regard to race, color or national origin.

**Appendix B Acknowledgement of Receipt of Title VI Plan**

I hereby acknowledge the receipt of Community Partners in Caring’s Title VI Plan. I have read the plan and am committed to ensuring that no person is excluded from participation in, or denied the services on the basis of race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1.B.

\_\_\_\_\_  
Your signature

\_\_\_\_\_  
Print your name

\_\_\_\_\_  
Date

**Appendix C TITLE VI COMPLAINT FORM**

Title VI of the 1964 Civil Rights Act requires that “No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.” If you feel you have been discriminated against in CPIC services, please provide the following information in order to assist us in processing your complaint and send it to:

Provide address here

Please print clearly:

Name: \_\_\_\_\_

Address: \_\_\_\_\_

City, State, Zip Code: \_\_\_\_\_

Telephone Number: \_\_\_(home)\_\_\_(cell)\_\_\_(work)

Person discriminated against: \_\_\_\_\_

Address of person discriminated against: \_\_\_\_\_

City, State, Zip Code: \_\_\_\_\_

Please indicate why you believe the discrimination occurred:

- Race
- Color
- National Origin
- Other

What was the date of the alleged discrimination? \_\_\_\_\_

Where did the alleged discrimination take place? \_\_\_\_\_

Please describe the circumstances as you saw it: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Please list any and all witnesses' names and phone numbers:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_



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Have you previously filed a Title VI complaint with this agency?

Yes  No

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: \_\_\_\_\_

Federal Court \_\_\_\_\_  State

Agency \_\_\_\_\_

State Court \_\_\_\_\_  Local Agency \_\_\_\_\_

Please provide information about a contact person at the agency/court where the complaint was filed.

Name: \_\_\_\_\_

Title: \_\_\_\_\_

Agency: \_\_\_\_\_

Address: \_\_\_\_\_

Telephone: \_\_\_\_\_

Please attach any documents you have which support the allegation. Then date and sign this form and send to the Title VI Coordinator at:

Executive Director  
Community Partners in Caring  
120 East Jones Street Suite 123  
Santa Maria, CA 93454

\_\_\_\_\_  
Your signature                      Date

\_\_\_\_\_

\_\_\_\_\_  
Print your name

## **APPENDIX D Sample Letter Acknowledging Receipt of Complaint**

Today's Date

Ms. Jo Doe  
1234 Main St.  
Santa maria, CA 93454

Dear Ms. Doe:

This letter is to acknowledge receipt of your complaint against Community Partners in Caring alleging\_\_\_\_\_.

An investigation will begin shortly. If you have additional information you wish to convey or questions concerning this matter, please feel free to contact this office by telephoning Vilma Contreras at 805-925-8000, or write to me at this address.

Sincerely,

Vilma Contreras, Executive Director  
Community Partners in Caring  
120 East Jones Street Suite 123  
Santa Maria, CA 93454

## APPENDIX E Sample Letter Notifying Complainant that the Complaint Is Substantiated

Today's Date

Ms. Jo Doe  
1234 Main St.  
Santa Maria, CA 93454

Dear Ms. Doe:

The matter referenced in your letter of \_\_\_\_ (date) against Community Partners in Caring alleging Title VI violation has been investigated.

(An/Several) apparent violation(s) of Title VI of the Civil Rights Act of 1964, including those mentioned in your letter (was/were) identified. Efforts are underway to correct these deficiencies.

Thank you for calling this important matter to our attention. You were extremely helpful during our review of the program. ***(If a hearing is requested, the following sentence may be appropriate.)*** You may be hearing from this office, or from federal authorities, if your services should be needed during the administrative hearing process.

Sincerely,

Vilma Contreras, Executive Director  
Community Partners in Caring  
120 East Jones Street Suite 123  
Santa Maria, CA 93454

**APPENDIX F Sample Letter Notifying Complainant that the Complaint Is Not Substantiated**

Today's Date

Ms. Jo Doe  
1234 Main St.  
Santa Maria, CA 93454

Dear Ms. Doe:

The matter referenced in your complaint of \_\_\_\_\_(date) against the Community Partners in Caring alleging \_\_\_\_\_ has been investigated.

The results of the investigation did not indicate that the provisions of Title VI of the Civil Rights Act of 1964, had in fact been violated. As you know, Title VI prohibits discrimination based on race, color, or national origin in any program receiving federal financial assistance.

Community Partners in Caring has analyzed the materials and facts pertaining to your case for evidence of the CPIC's failure to comply with any of the civil rights laws. There was no evidence found that any of these laws have been violated.

I therefore advise you that your complaint has not been substantiated, and that I am closing this matter in our files.

You have the right to 1) appeal within seven calendar days of receipt of this final written decision from Community Partners in Caring, and/or 2) file a complaint externally with the U.S. Department of Transportation and/or the Federal Transit Administration at

Federal Transit Administration  
Office of Civil Rights  
Attention: Title VI Program Coordinator  
East Building, 5th Floor - TCR  
1200 New Jersey Ave., SE  
Washington, DC 20590

Thank you for taking the time to contact us. If I can be of assistance to you in the future, do not hesitate to call me.

Sincerely,

Vilma Contreras, Executive Director  
Community Partners in Caring  
120 East Jones Street Suite 123  
Santa Maria, CA 93454

**APPENDIX G Samples of Narrative to be Displayed in Facilities**

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that "no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance" (42 U.S.C. Section 2000d).

Community Partners in Caring is committed to ensuring that no person is excluded from participation in, or denied the benefits of its services on the basis of race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1.B. **If you feel you are being denied participation in or being denied benefits of the services provided by Community Partners in Caring, or otherwise being discriminated against because of your race, color, national origin, gender, age, or disability, you may contact our office at:**

**Vilma Contreras, Executive Director  
Community Partners in Caring  
120 East Jones Street Suite 123  
Santa Maria, CA 93454**

For more information, visit our website at  
[www.partnersincaring.org](http://www.partnersincaring.org)

# LIMITED ENGLISH PROFICIENCY (LEP) PLAN

## COMMUNITY PARTNERS IN CARING (CPIC)

### Introduction

This Limited English Proficiency (LEP) Plan has been prepared to address Community Partners in Caring's 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 4702.1B dated October 1, 2012, which states 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 (LEP)", indicates that differing treatment based upon a person's inability to speak, read, write or understand English is a type of national origin's 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 CPIC as a recipient of Federal transit funds.

### Plan Summary

CPIC has developed this LEP Plan to help identify reasonable steps for providing language assistance to persons with Limited English Proficiency who wish to access transportation services provided by recipients of FTA assistance for persons residing, visiting or working in the CPIC region. 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, the ways in which assistance may be provided, staff training that may be required, and how to notify LEP persons that assistance is available.

The guidance outlines four factors recipients are to consider when assessing language needs and determining appropriate steps to ensure meaningful access to services for LEP persons. In order to prepare this plan, CPIC undertook the U.S. Department of Transportation (U.S. DOT) four-factor LEP analysis which considers the following:

1. The number or proportion of LEP persons to be served or likely to be encountered in a CPIC program, activity or service.
2. The frequency with which LEP persons come in contact with CPIC programs, activities or services.
3. The nature and importance of programs, activities or services provided by CPIC to the LEP population.
4. The resources available to CPIC and overall cost to provide LEP assistance.

A summary of the results of the CPIC four-factor analysis is in the following section.

## LIMITED ENGLISH PROFICIENCY (LEP) PLAN Continued

### Four-Factor Analysis

1. The number or proportion of LEP persons in the region who may be served or are likely to encounter a CPIC program, activity or service.

CPIC used the 2006-2010 American Community Survey Report and determined that 39.9% of the population in Santa Barbara County speak a language other than English.

2. The frequency with which LEP persons come in contact with CPIC programs, activities or services.

CPIC assessed the frequency with which staff have or could have contact with LEP persons. This includes documenting Traveler Information and phone inquiries.

Records indicate

Translated documents are prepared for the annual report (posting in all transit vehicles, distribution in public libraries, community centers, health centers, and posting on the web site).

3. The nature and importance of programs, activities or services provided by CPIC to the LEP population.

The largest proportion of LEP individuals in the CPIC service area speaks Spanish (i.e. 85%). Due to the very small representation of other foreign languages, CPIC has not historically taken special language accommodation measures for those non Spanish speaking groups.

Other planning activities involving riders' surveys (bi-lingual forms). Lastly, all information pieces and collateral associated with Community Partners in Caring's program have been developed in both English and Spanish.

4. The resources available to CPIC and overall cost to provide LEP assistance.

CPIC assessed its available resources that could be used for providing LEP assistance, including determining the amount of staff time and training that might be needed was also considered. Based on the four-factor analysis, CPIC developed its LEP Plan as outlined in the following section.



## LIMITED ENGLISH PROFICIENCY (LEP) PLAN

### Limited English Proficiency (LEP) Plan Outline

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

1. Review prior requests for language assistance to determine if language assistance might be needed at future travelers.
2. Front-line staff will be surveyed annually on their experience concerning any contacts with LEP persons during the previous year.

### Language Assistance Measures

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

- Front-line staff, and program coordinators will be surveyed annually on their experience concerning any contacts with LEP persons during the previous year.
- Network with local human service organizations providing services to LEP individuals and seek opportunities to provide information on CPIC programs and services within their agency setting or at jointly sponsored functions.
- Provide a bilingual Community Outreach Coordinator at community events and Board meetings when deemed necessary.
- Provide Translated collateral at offices.
- Post the CPIC Title VI Policy and LEP Plan on the agency website, [www.partnersincaring.org](http://www.partnersincaring.org)
- 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 CPIC staff:

1. Information on the CPIC 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 may be available as needed.

## Monitoring and Updating the LEP Plan

CPIC will update the LEP as required by U.S. DOT. At minimum, the plan will be reviewed and updated when data from new ACS counts are available, or when it is clear that higher concentrations of LEP individuals are present in the CPIC region. 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 per the latest Census reports at the community level
- Determination as to whether the need for translation services has changed or whether a change in the contractor used for translation services is warranted based on geographical proximity or availability at times needed
- Determine whether CPIC's financial resources are sufficient to fund bi-lingual language assistance resources needed

## LIMITED ENGLISH PROFICIENCY (LEP) PLAN

- Determine whether CPIC has fully complied with the goals of this LEP Plan
- Determine whether complaints have been received concerning CPIC's failure to meet the needs of LEP individuals

### Dissemination of the CPIC LEP Plan

A link to the CPIC LEP Plan and the Title VI Procedures is included on the CPIC website at [www.partnersincaring.org](http://www.partnersincaring.org).

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

Questions or comments regarding the LEP Plan may be submitted to Community Partners in Caring, Title VI Coordinator:

**Vilma Contreras, Executive Director**  
**Community Partners in Caring**  
**120 East Jones Street Suite 123**  
**Santa Maria, CA 93454**

Phone: 805-925-8000

Fax: 805-925-8170

Email: [vilma@partnersincaring.org](mailto:vilma@partnersincaring.org)