

Golden Rain Foundation of Walnut Creek

TITLE VI PROGRAM

Developed: October 2020
**Approved by Golden Rain Foundation of Walnut Creek Board of
Directors**

Golden Rain Foundation
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www.Rossmoor.com

INTRODUCTION

This document was prepared by Golden Rain Foundation 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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Golden Rain Foundation of Walnut Creek Title VI Notice to the Public

Notifying the Public of Rights Under Title VI Golden Rain Foundation of Walnut Creek

- Golden Rain Foundation of Walnut Creek operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with Golden Rain Foundation of Walnut Creek.
- For more information on Golden Rain Foundation of Walnut Creek civil rights program, and the procedures to file a complaint, contact Golden Rain Foundation of Walnut Creek, or visit our administrative office at 1001 Golden Rain Rd. Walnut Creek, CA 94595. For more information, visit www.Rossmoor.com.
- A complainant may be directly filed 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 (925) 988-7700.

Notificar al público de los derechos bajo el título VI Golden Rain Foundation of Walnut Creek

- Golden Rain Foundation of Walnut Creek opera sus programas y servicios sin respecto a raza, color y origen nacional con arreglo al título VI de la Civil Ley de derechos. Cualquier persona que cree que él o ella ha sido agraviado por cualquier práctica discriminatoria ilegal bajo el título VI puede presentar una queja con Golden Rain Foundation of Walnut Creek
- 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 1001 Golden Rain Rd. Walnut Creek. Para más información, visite www.Rossmoor.com
- 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 (925) 988-7700.

List of Locations Where Title VI Notice Is Posted

Golden Rain Foundation of Walnut Creek notice to the public is currently posted at the following locations:

Location Name	Address	City
Administration Offices	1001 Golden Rain Rd.	Walnut Creek
Bus Transportation Office	800 Rockview Dr.	Walnut Creek
Bus Transportation Fleet (All Buses)	800 Rockview Dr.	Walnut Creek
Website	www.rossmoor.com	

When not in use, the 5310 Vehicles are stored at the following address:

Bus Transportation
800 Rockview Dr.
Walnut Creek, CA 94595

The Title VI notice and program information is also provided on Golden Rain Foundation of Walnut Creek website at www.Rossmoor.com

Title VI Complaint Procedures

As a recipient of federal dollars, Golden Rain Foundation 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. Golden Rain Foundation has in place a Title VI Complaint Procedure, which outlines a process for local disposition of Title VI complaints and is consistent with guidelines found in the Federal Transit Administration Circular 4702.1B, dated October 1, 2012.

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by Golden Rain Foundation may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form. Golden Rain Foundation investigates complaints received no more than 180 days after the alleged incident. Golden Rain Foundation will only process complaints that are complete.

Within 10 business days of receiving the complaint, Golden Rain Foundation 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. Golden Rain Foundation 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, Golden Rain Foundation 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 Golden Rain Foundation 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.

Golden Rain Foundation of Walnut Creek Title VI Complaint Form

COMPLAINT FORM

Section I: Please write legibly		
1. Name:		
2. Address:		
3. Telephone:	3.a. Secondary Phone <i>(Optional)</i> :	
4. Email Address:		
5. Accessible Format Requirements?	<input type="checkbox"/> Large Print	<input type="checkbox"/> Audio Tape
	<input type="checkbox"/> TDD	<input type="checkbox"/> Other
Section II:		
6. Are you filing this complaint on your own behalf?	YES*	NO
*If you answered "yes" to #6, go to Section III.		
7. If you answered "no" to #6, what is the name of the person for whom you are filing this complaint? Name:		
8. What is your relationship with this individual:		
9. Please explain why you have filed for a third party:		
10. Please confirm that you have obtained permission of the aggrieved party to file on their behalf.	YES	NO
Section III:		
11. I believe the discrimination I experienced was based on <i>(check all that apply)</i> :		
<input type="checkbox"/> Race	<input type="checkbox"/> Color	<input type="checkbox"/> National Origin
12. Date of alleged discrimination: <i>(mm/dd/yyyy)</i>		
13. Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known), as well as names and contact information of any witnesses. If more space is needed, please attach additional sheets of paper.		

Golden Rain Foundation of Walnut Creek Title VI Complaint Form, Page 2

COMPLAINT FORM

Section IV:		
14. Have you previously filed a Title VI complaint with Golden Rain Foundation of Walnut Creek?	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:

Golden Rain Foundation of Walnut Creek
Title VI Coordinator
1001 Golden Rain Rd.
Walnut Creek, CA 94595

Titulo VI Procedimiento de Queja

Como un receptor de dólares federales, Golden Rain Foundation tiene que cumplir con lo dispuesto en el Titulo 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. Golden Rain Foundation ha puesto en marcha un procedimiento de queja Titulo VI, que emboza un proceso de disposición local de quejas del Titulo 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 Golden Rain Foundation puede presentar al Titulo VI su denuncia. Golden Rain Foundation investiga las quejas no mas de 180 días después del incidente. Golden Rain solo tramitara las quejas que están completas.

En un periodo de 10 días de haber recibido la demanda, Golden Rain Foundation 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. Golden Rain tiene 30 días para investigar la queja.

Si necesita mas información para resolver el caso, Golden Rain Foundation 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 Golden Rain Foundation.	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:		

Por favor de entregar esta forma a:

Golden Rain Foundation of Walnut Creek
 Title VI Coordinator
 1001 Golden Rain Rd.
 Walnut Creek, CA 94595

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

Golden Rain Foundation of Walnut Creek has **not been involved in** any transportation-related Title VI investigations, lawsuits or complaints.

Golden Rain Foundation of Walnut Creek

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 Golden Rain Foundation of Walnut Creek

Golden Rain Foundation of Walnut Creek (GRF) is a non-profit corporation that provides property management and community services to a defined population of senior adults living within the Rossmoor community in Walnut Creek, CA. Rossmoor is a gated senior adult community within the city limits of Walnut Creek. Rossmoor has a population of just over 9,400 residents. The Rossmoor community is made up from adults over 55 years of age, from a wide range of income levels. The average age of the residents is over 77 years.

The residents of the Rossmoor community are members of GRF. The GRF board of directors is elected from the resident population. Services for all programs are provided by GRF, funded by monthly coupon payments made by the members in the community. The program does not serve the general public but rather a defined population of seniors that are members of GRF, along with their guests, employees and caregivers.

GRF is licensed by the State of California Public Utilities Commission as a Private Carrier to provide bus transportation for the members of GRF, along with their guests, employees and caregivers.

The GRF transportation program provides bus transportation for the community of Rossmoor. The transportation service types provided by GRF include Modified Fixed-Route, Dial-A-Bus and Paratransit service.

GRF also provides accommodations for many other types of activities and services, among these are a Public Safety contract with a security company, two golf courses, a fitness center, bowling greens, and three community swimming pools.

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 “improve the lives of seniors, with and without disabilities by creating an environment to maintain and maximize their independence.” At every opportunity through prescribed methods the agency will solicit input from stakeholders in order to best support persons served without creating disproportionately high and adverse human health or environmental effects on minority and/or low-income populations.

Summary of Outreach Efforts

The following is a summary of outreach efforts conducted by Golden Rain Foundation of Walnut Creek 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.

Board Meetings Open to the Public

Golden Rain Foundation Monthly Board meetings are open to all residents of the Rossmoor community and announced on the agency's website and in the Rossmoor News.

Rossmoor Community Clubs

Golden Rain Foundation of Walnut Creek provides accommodation for meetings and operations of many clubs and organizations, including:

B'nai Brith	Italian American Club
B'nai Israel	Japanese-American Club
Chinese-American Association	Korean-American Club
Filipino-American Association	Shalom Club
Greek Club	Voices for Justice in Palestine

City of Walnut Creek, Community Emergency Response Teams (CERT)

Golden Rain Foundation of Walnut Creek cooperates with The City of Walnut Creek CERT, providing personnel, space and transportation accommodations for the semi-annual emergency response training and drills.

Coordinated Public Transit/Human Services Transportation

Golden Rain Foundation of Walnut Creek is included in the Coordinated Public Transit/Human Services Transportation Plan, Elderly and Disabled Component. This plan is on file with Metropolitan Transportation Commission, which serves the nine county San Francisco Bay Area.

Lions Club

Golden Rain Foundation of Walnut Creek hosts the Lions Club, and provides accommodations for their activities such as White Cane Days, eyeglasses collections, etc.

Rossmoor News/Channel 28

Golden Rain Foundation of Walnut Creek operates a media outlet, publishing the Rossmoor News, a local weekly newspaper. Golden Rain Foundation also operates Channel 28, an in-house television channel that is available to all Rossmoor residents in the basic cable package that is part of their community amenities.

Food, Clothing and Toy Drives

Annually, Golden Rain Foundation conducts food, clothing and toy drives to connect with and benefit low-income populations. These events are publicized through press releases to various media outlets and flyers.

Golden Rain Foundation of Walnut Creek Website

Currently, Golden Rain Foundation of Walnut Creek posts notices and announcement on the agency's website. Additional public input can be obtained by the Title VI Complaint Form, which is available in English and Spanish.

The agency also maintains a Public Relations Committee that meets on a quarterly basis and sets annual marketing and outreach goals. The Committee conducts various comprehensive outreach activities throughout the year including public engagements, newsletters, open houses and press releases. Additionally, on an annual basis the agency develops a comprehensive Strategic Marketing Plan that includes Public Relations, Employee and Consumer Relations, Production and Manufacturing, New Products and Program Development. An annual In-Service training program for staff is included in this 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 Life Skills Learning Center program, activity or service.
- **Factor 2:** The frequency with which LEP persons come in contact with the Life Skills Learning Center program, activity or service.
- **Factor 3:** The nature and importance of programs, activities or services provided by Life Skills Learning Center to the LEP population.
- **Factor 4:** The resources available to [Golden Rain Foundation](#) 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. Golden Rain Foundation of Walnut Creek 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 Golden Rain Foundation of Walnut Creek.

Golden Rain Foundation of Walnut Creek holds a unique position in regard to meeting the Title VI requirements. As a sub-recipient of FTA 5310 Grant funding, the agency's focus is primarily to transport senior adults, with and without disabilities where current public transit options are insufficient or do not exist. Eligible program participants or "riders" must be residents, guests and/or employees of the Rossmoor community. As such, Golden Rain Foundation of Walnut Creek does not offer transportation to the general public other than in situations involving a coordinated plan with other entities. Therefore, an analysis of public demographic data in Contra Costa County, or even the city of Walnut Creek does not represent actual populations served by this program but is offered for comparison purposes only.

The source of data that most accurately represents LEP persons likely to be served by the program is the demographic data from the city-data.com for zip code 94595.

In the Saranap area of Walnut Creek, CA, of the 16,170 residents living there:

84.8 % of residents of 94595 zip code speak English at home.

6.4% of residents speak Spanish at home (65% speak English very well, 22% well, 9% not well, 3% not at all).

5.5% of residents speak other Indo-European language at home (74% speak English very well, 21% well, 5% not well).

3.4% of residents speak Asian or Pacific Island language at home (57% speak English very well, 15% well, 20% not well, 7% not at all).

0.9% of residents speak other language at home (68% speak English very well, 20% well, 12% not well).

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

As indicated above, historically, LEP consumers constitute less than 2% of our clientele. However, a survey of the agency's phone dispatching staff indicated calls from LEP persons are received 1-3 times per week. The staff indicated that these calls are primarily received from families of caregivers rather than actual program participants (residents).

Occasional consumer and care provider surveys provide an opportunity for input and suggested services. Surveys have not contained requests for translation services. Translation services are provided by agency staff as appropriate. Again, the majority of translation occurs with caregivers, not member residents.

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

The primary purpose of the Golden Rain Foundation of Walnut Creek program is to provide property management and community services for the senior population of the Rossmoor community. These services allow the residents to age in place, rather than having to move out once they can no longer drive, care for their homes, etc. Transportation during Community Integration training is offered daily as a part of the service in addition to bus transportation to/from the area shopping, medical, social and religious facilities. Occasional resident surveys indicate that transportation is an important part of the services offered for consumers.

Currently, Golden Rain Foundation of Walnut Creek serves 9,436 consumers. The length of time an individual is typically a member of the Rossmoor community can range from a few months to many years.

While, the Golden Rain Foundation of Walnut Creek program is relatively small and is not an "essential" program, it does create opportunities that can enhance the quality of life for seniors, with and without disabilities.

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

The Golden Rain Foundation of Walnut Creek operating budget does not have a specific line item for providing language access and outreach. Outreach expenses as they relate to LEP populations are split among several departments depending on which department is responsible for the outreach. The costs for translation of documents are minimal and have not been quantified. Significant outreach budget allocations for the entire agency this fiscal year include but are not limited to redesign of agency web page: \$12,500.

The budget for the Bus Transportation Department of Golden Rain Foundation of Walnut Creek, which provides services through the FTA 5310 grant, is a small fraction of the Foundation's budget. The total annual expenditures for the Bus Transportation Department's outreach activities are less than \$200. Specific outreach to LEP populations has not been conducted as a reasonably significant number of LEP persons have not been served by this program, as indicated in Factor 1.

SUMMARY

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

- It is likely that FTA Section 5310 provided funding for very few residents that spoke something other than English as a primary language in past year. English proficiency of those few is unknown.
- No "true" LEP persons are known to have been served by the program in past years.
- No residents were underserved or filed complaints due to language barriers.
- Surveyed dispatching staff reported 1-3 LEP phone calls per week.
- Provision of transit is not considered an "essential" service but is a component of the Golden Rain Foundation of Walnut Creek program.
- Golden Rain Foundation of Walnut Creek does not have an LEP specific budget line.
- Golden Rain Foundation of Walnut Creek, Bus Transportation Department spends less than \$200 per year on all outreach efforts.

Language Assistance Implementation Plan

Methodologies

Identifying LEP Individuals

As evidenced by the Four Factor Analysis, very few "true" LEP individuals are members of the Golden Rain Foundation of Walnut Creek. The predominant minority language in the region is Spanish. The consumers that are primarily served by the Golden Rain Foundation of Walnut Creek, Bus Transportation Department have age-related disabilities that affect articulating language rather than a language barrier alone.

There is no substantial minority population in the region, according to the City-Data.com census collection data. The agency does, however, have systems in place to provide access to minority populations.

Providing Services

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

- Title VI Notice to the Public
- Title VI Complaint Form
- Title VI Complaint Procedures
- Consumer Program Handbook including ABLE Grievance Policy
- Agency website Title VI information

Other documents can be translated to Spanish orally as appropriate.

Communicating Availability of Language Assistance

Individuals who are referred to Golden Rain Foundation of Walnut Creek, Bus Transportation Department for services are assessed by a Travel Coordinator who provides one-on-one guidance and program planning. The Travel Coordinator can offer Spanish translation services through alternate agency staff as needed. Agency dispatching staff can also offer translation services to guests and consumers' family members as appropriate.

The new agency website will also contain summary information in Spanish with instructions on how to obtain more information.

Monitoring

Golden Rain Foundation of Walnut Creek maintains an Accessibility Plan which is designed to minimize barriers that are created by architectural factors, environmental factors, attitudinal factors, financial and employment barriers and communication barriers such as language. This plan is reviewed and updated periodically.

Golden Rain Foundation of Walnut Creek, Bus Transportation Department Operating Productivity Report is analyzed for trends and patterns that indicate a need for additional services.

Satisfaction Surveys for the program offer an opportunity for consumers and their care givers to provide input or suggest additional services. To date, translation services have not been requested. The Title VI Plan will also be evaluated and updated every three years.

Employee Training

Golden Rain Foundation of Walnut Creek conducts regular In-Service training for staff that can include Customer Service, Language Assistance training and Lift Procedures for Wheelchair Passenger.

As a part of the Accessibility Plan, the agency encourages staff interest and education in learning to communicate with senior individuals more effectively.

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 Golden Rain Foundation of Walnut Creek serves seniors, with and without moderate to severe disabilities. When requested, program documents are generally interpreted orally by the appropriate agency staff.

Membership of Non-Elected Committees and Councils

Golden Rain Foundation of Walnut Creek does not have a non-elected transit related advisory council at this time.

Title VI Equity Analysis

The Golden Rain Foundation Bus Transportation Department operates only five fixed routes during peak service hours.

Golden Rain Foundation of Walnut Creek is funded through monthly coupon payments, which are determined by a Board of Directors elected from and by the residents of the Rossmoor community. The cost is allocated by manor (individual household) and all manors are charged the same amount for the services received from the Bus Transportation Department. All areas of the Rossmoor community receive equal coverage by the Bus Transportation Department.

Board of Directors Approval of Golden Rain Foundation of Walnut Creek Title VI Program

A RESOLUTION OF THE Golden Rain Foundation of Walnut Creek BOARD OF DIRECTORS AUTHORIZING THE TITLE VI COMPLIANCE PLAN FOR THE AGENCY.

WHEREAS, Golden Rain Foundation of Walnut Creek 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 Golden Rain Foundation of Walnut Creek as follows:

1. Chief Executive Officer (CEO) is authorized to implement the components of the plan in order to meet Federal requirements.
2. The CEO 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 Golden Rain Foundation of Walnut Creek, State of California, on this 30th Day of December 2020.

President of the Board