

Jewish Family Service of San Diego

TITLE VI PROGRAM

Program with Federally Funded Transportation Components:

On the Go: Transportation Solutions for Older Adults (Section 5310 funding)

Updated: April 2019

Approved by Jewish Family Service of San Diego Board of Directors: TBD

Dana Toppel, Chief Operating Officer
Jewish Family Service of San Diego
JOAN & IRWIN JACOBS CAMPUS
Community Services Building
8804 Balboa Avenue
San Diego, CA 92123
Phone: (858)637-3000
Email: COOOffice@JFSSD.org

INTRODUCTION

This document was prepared by Jewish Family Service to comply with Title VI of the Civil Rights Act of 1964, including new provisions detailed in U.S. Department of Transportation's FTA Circular 4702.1B, "Title VI Requirement and Guidelines for Federal Transit Administration Recipients."



Table of Contents

Title VI Notice to the Public	Pg. 3
List of Locations Where Title VI Notice Is Posted	Pg. 5
Title VI Complaint Procedures	Pg. 6
Title VI Complaint Form	Pg. 8
Transit-Related Title VI Investigations, Complaints, and Lawsuits	Pg. 15
Public Participation Plan	Pg. 15
Summary of Outreach Efforts	Pg. 15
Language Assistance Plan	Pg. 17
Membership of Non-Elected Committees and Councils	Pg. 25
Title VI Equity Analysis	Pg. 25
Board of Directors Approval of Title VI Program	Pg. 26
Appendix	Pg. 27

1a JFS Title VI Notice to the Public

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).

Jewish Family Service of San Diego (JFSSD) is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transportation 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 JFSSD in its administration and management of Title VI-related activities in the federally funded transportation components of its programs. Complaint forms and procedures are available on the JFSSD website in both English and Spanish.

http://www.jfssd.org/site/PageServer?pagename=programs_older_on_the_go

Title VI Coordinator Contact Information:

Dana Toppel, Chief Operating Officer
Jewish Family Service of San Diego
JOAN & IRWIN JACOBS CAMPUS
Community Services Building
8788 Balboa Avenue
San Diego, CA 92123
Phone: (858)637-3000
Email: COOOffice@JFSSD.org

1b

Notifying the Public of Rights Under Title VI

Jewish Family Service of San Diego

- Jewish Family Service of San Diego 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 Jewish Family Service of San Diego
- For more information on Jewish Family Service of San Diego civil rights program, and the procedures to file a complaint, contact us by phone at (858) 637-3000 or email at COOOffice@JFSSD.org, or visit our administrative office at the JOAN & IRWIN JACOBS CAMPUS, Community Services Building, 8788 Balboa Avenue, San Diego, CA 92123.
- 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 the Title VI Coordinator. Si se necesita información en otro idioma, contacte al Title VI Coordinator.

Title VI Coordinator Contact Information:

Dana Toppel, Chief Operating Officer
Jewish Family Service of San Diego
JOAN & IRWIN JACOBS CAMPUS
Community Services Building
8804 Balboa Avenue
San Diego, CA 92123
Phone: (858)637-3000
Email: COOOffice@JFSSD.org

Notificar al público de los derechos bajo el título VI
Jewish Family Service de San Diego

- Jewish Family Service de San Diego 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 Jewish Family Service de San Diego
- Para obtener más información sobre el programa derechos civiles capaz de industrias y los procedimientos para presentar una queja, llame al (559) 651-8150, o visite nuestra oficina administrativa en Jewish Family Service de San Diego. Para más información información, contáctenos por teléfono al 858-637-3000 o envíenos un correo electrónico a COOOffice@JFSSD.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:

Title VI Coordinator Contact Information:

Dana Toppel, Chief Operating Officer
Jewish Family Service of San Diego
JOAN & IRWIN JACOBS CAMPUS
Community Services Building
8804 Balboa Avenue
San Diego, CA 92123
Phone: (858)637-3000
Email: COOOffice@JFSSD.org

2 List of Locations Where Title VI Notice Is Posted

Jewish Family Service of San Diego notice to the public is currently posted at the following locations:

- **2a** Agency Website: http://www.jfssd.org/site/PageServer?pagename=programs_older_on_the_go
Our Service Commitment
On the Go: Transportation Solutions for Older Adults operates its transportation service without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes they have been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the Chief Operating Officer at (858) 637-3000 or [click here](#) to complete a complaint form ([haga clic aquí](#) para obtener la versión en español).
- **2b** Public Areas of Agency Offices Located at:
8804 Balboa Ave., San Diego, CA 92123
8788 Balboa Ave., San Diego, CA 92123
North County Inland Rides & Smiles -13094 Civic Center Dr., Poway, CA 92064
- **2c** JFSSD Aging & Wellness Centers located at:
8788 Balboa Ave., San Diego, CA 92123
6299 Capri Dr., San Diego, CA 92120
- **2d** On all federally funded vehicles used for transportation in JFSSD's programs.
Vehicles are located at:
8804 Balboa Ave., San Diego, CA 92123
8788 Balboa Ave., San Diego, CA 92123
18402 West Bernardo Drive, San Diego, CA 92064
6299 Capri Dr., San Diego, CA 92120

3 Title VI Complaint Procedures

Jewish Family Service of San Diego 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.

When is it appropriate to file a Title VI Complaint?

The following complaint procedures are applicable to all persons who believe that they have been subject to discrimination by Jewish Family Service of San Diego related to *On the Go*: Transportation Solutions for Older Adults, which is funded in whole or in part by federal funds. In general, it is designed to address disputes, including but not limited to the following:

- Disagreements regarding a requested service, accommodation, or modification of a Jewish Family Service practice or requirement.
- Inaccessibility of a program, publication, or activity.
- Harassment or discrimination prohibited by California or federal law.

How To File A Title VI Complaint

Prior to submitting a formal complaint, the complaining party shall contact the Title VI Coordinator for assistance in resolving the matter informally as soon as is practical, generally within 15 calendar days of the time from when the subject of the complaint occurred or the complaining party became aware of Jewish Family Service of San Diego's (JFSSD) alleged non-compliance with state or federal non-discrimination laws.

JFSSD will notify SANDAG of the complaint within 72 hours of receiving the complaint and record the complaint and steps taken toward resolution. JFSSD is responsible for informing the complaining party about JFSSD's complaint procedure, including the opportunity to file a formal complaint with SANDAG and/or the Federal Transit Administration (FTA).

JFSSD's Title VI Complaint forms and procedures may be requested by phone, in writing or via agency website.

A written and signed agency complaint form may be filed up to one hundred and eighty (180) days from the date of the alleged discrimination. JFSSD will only process complete agency complaint forms.

The Title VI Complaint Form may be used to submit the complaint information. The complaint must be filed in writing with JFSSD at the following address in order for JFSSD to properly investigate any allegation of discrimination.

JFSSD Title VI Coordinator:

Dana Toppel, Chief Operating Officer
Jewish Family Service of San Diego
JOAN & IRWIN JACOBS CAMPUS
Community Services Building
8788 Balboa Avenue
San Diego, CA 92123
Fax: (858) 637-3001
Email: COOOffice@JFSSD.org

NOTE: JFSSD encourages all persons filing a complaint for discrimination to use Certified Mail through the U.S. Postal Service and/or ensure that all written correspondence can be tracked easily. For complaints originally submitted by fax or email, an original, signed complaint must also be mailed to the Title VI Coordinator as soon as possible, but not later than one hundred eighty (180) days from the alleged date of discrimination.

Alternatively, the Title VI Complaint Form may be filed in writing with SANDAG at the following address:

Title VI Coordinator
SANDAG
401 B Street, Suite 800
San Diego, CA 92101
Telephone: 619-699-1900; Fax: 619-699-1995; TTY 619-699-1904

See the SANDAG Title VI Complaint Procedures below.

What Happens To The Complaint After It Is Submitted?

All complaints alleging discrimination based on race, color or national origin in a transportation service or benefit provided by JFSSD will be directly addressed by JFSSD for investigation. JFSSD shall also provide appropriate assistance to anyone who files a complaint, including those persons with disabilities, or who are limited in their ability to communicate in English.

JFSSD shall make every effort to address all complaints in a timely and thorough manner. A letter acknowledging receipt of the complaint will be mailed within ten (10) days. Please note that if a person who has filed a complaint does not respond to any request(s) for additional information from JFSSD within ten (10) days, the complaint may be closed and no further investigation will take place.

JFSSD has thirty (30) days to investigate the complaint. The complainant will be notified in writing of the cause to any planned extension to the thirty (30) day rule.

How Will The Complainant Be Notified Of The Outcome Of The Complaint?

A representative of JFSSD will send a final written response letter to SANDAG and the person filing the complaint within 30 calendar days of receiving the complaint. Various methods of resolution exist.

1. ***Substantiated Complaints*** -- If the complaint is substantiated and it appears that discrimination on the basis of race, color or national origin has occurred, this Title VI program and procedures prohibiting discrimination will be reviewed with the offender. Appropriate disciplinary action and/or training will be taken according to the agency's disciplinary procedures.
2. ***Unsubstantiated Complaints*** -- If there is insufficient evidence to either prove or disprove the allegation(s) of Title VI discrimination, both parties to the complaint will be informed of the reason(s) for this disposition.
3. ***Unfounded Complaint*** – If it is determined that an act reported pursuant to this Title VI program/procedure did not in fact occur, a finding of “unfounded” shall be made.

If a complaint is found to be unsubstantiated, JFSSD will send a letter notifying the person filing the complaint. In the letter, the person who filed the complaint will also be advised of his or her right to:

1. Provide additional information to JFSSD for consideration of the complaint within ten (10) calendar days of receipt of the final written decision from the Title VI Coordinator, and/or
2. File a complaint externally with SANDAG, the U.S. Department of Transportation and/or the FTA.

What happens if the complainant is not satisfied with JFSSD's finding?

If the complaining party is not satisfied with JFSSD's disposition of the matter, the complaining party may file a formal complaint with SANDAG following the procedure described below.

SANDAG Title VI Complaint Procedures

Filing

The complaining party may file a formal, written complaint with SANDAG in the manner described below. SANDAG materials can be made available in alternative languages. To make a request, call (619) 699-1900. Los materiales de SANDAG están disponibles en otros idiomas. Para hacer una solicitud, llame al (619) 699-1900.

- Complaints must be filed within ten (10) calendar days of the complaining party's receipt of notice of the end of the JFSSD review process described above.

- Complaints must be in writing and must include an attached copy of any correspondence concerning the complaint with JFSSD.
- Complaints must be filed with the SANDAG Title VI Compliance Officer at 401 B Street, Suite 800, San Diego, CA 92101; Fax number (619) 699-1995; TTY (619) 699-1904.

Investigation

The SANDAG Title VI Compliance Officer will initiate an investigation, which may include interviewing, consulting with, and/or requesting a written response to the issues raised in the complaint from any individual the SANDAG Title VI Compliance Officer believes to have relevant information, including the ADA Compliance Officer, JFSSD staff and members of the public. SANDAG may also hold an informal hearing.

Review Panel

The SANDAG Title VI Compliance Officer will convene a review panel that will consist of the Title VI Compliance Officer, the ADA Compliance Officer if applicable, a member of the SANDAG management staff, the Chief Deputy Executive Director (or designee), and (depending on the issues) other personnel as may be appropriate. This panel will review the request, investigate, and attempt to resolve the issues within 30 calendar days of receipt by SANDAG of the complaint. The complaining party, and any party against whom the complaint is directed, have the right to have a representative.

Findings and Notification

The SANDAG Title VI Compliance Officer and/or ADA Compliance Officer will prepare and provide the complaining party, and all other parties involved, a final report containing a summary of the investigation, written findings, and a proposed disposition. This report will be provided to the complaining party and JFSSD within 45 calendar days of the filing of the formal complaint.

Final Disposition

The disposition proposed by the review panel will be put into effect promptly. The complaining party or any party against whom the complaint or the proposed disposition is directed may appeal. The appeal to the Executive Director (as set forth below) will not suspend the implementation of the disposition proposed by the SANDAG review panel, except in those circumstances where the SANDAG Executive Director decides that good cause exists making the suspension of implementation appropriate.

Appeal

Within 10 calendar days of the issuance of the final report, the complaining party may appeal to the SANDAG Executive Director.

- An appeal is taken by filing a written request for review by the SANDAG Executive Director.

- The written request for review must specify the particular substantive, and/or procedural basis for the appeal, and must be made on grounds other than general dissatisfaction with the proposed disposition. Furthermore, the appeal must be directed only to issues raised in the formal complaint as filed or to procedural errors in the conduct of the complaint procedure itself, and not to new issues.
- The review by the Executive Director or his or her designee normally shall be limited to the following considerations: Were the proper facts and criteria brought to bear on the decision? Were improper or extraneous facts or criteria brought to bear on the decision that substantially affected the decision to the detriment of the complaining party? Were there any procedural irregularities that substantially affected the outcome of the matter to the detriment of the complaining party? Given proper facts, criteria, and procedure, was the decision one that a person in the position of the decision-maker might reasonably have made?
- A copy of the Executive Director's written decision will be expected within 30 calendar days of the filing of the appeal and shall be sent to all parties involved and, if appropriate, to persons whose authority will be needed to carry out the disposition. The deadline may be extended by the Executive Director for good cause. The decision of the Executive Director on the appeal will be SANDAG's final decision.

How to file a complaint directly with the FTA

File with the FTA. Any person who believes himself or herself or any specific class of persons to be subjected to discrimination prohibited by Title VI also may file a written complaint with the FTA. A complaint should be filed no later than 180 days after the date of the alleged discrimination, unless the time for filing is extended by FTA. Title VI complaints regarding federally funded programs at JFSSD can be sent to the applicable funding agency below:

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

TITLE VI COMPLAINT FORM ENGLISH

Title VI Complaint Form

Name _____ Date _____

Address _____

City _____ State _____ Zip Code _____

Home Telephone (include area code) _____ Best Time to Reach You _____

Were you discriminated against because of:

Race National Origin Color Other _____

Date of alleged incident _____

Explain as clearly as possible what happened and how you were discriminated against. Indicate who was involved. Be sure to include names and contact information of any witnesses (please use back of form if more space is needed).

Have you filed this complaint with any other federal, state, or local agencies? **(Circle one) Yes/No**

If so, list agency/agencies and contact information below:

Agency _____ Contact Name _____

Address _____

City _____ State _____ Zip Code _____ Phone _____

Agency _____ Contact Name _____

Address _____

City _____ State _____ Zip Code _____ Phone _____

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

Signature

Date

Please complete and mail this form to:
Dana Toppel, Chief Operating Officer
Jewish Family Service of San Diego
JOAN & IRWIN JACOBS CAMPUS
Community Services Building
8788 Balboa Avenue
San Diego, CA 92123

Alternatively, the Title VI Complaint Form may be filed in writing with SANDAG at the following address:

Title VI Coordinator
SANDAG
401 B Street, Suite 800
San Diego, CA 92101
Telephone: 619-699-1900; Fax: 619-699-1995; TTY 619-699-1904

TITLE VI COMPLAINT PROCEDURE TRANSLATED IN SPANISH

Formulario para procedimientos de reclamos por discriminación

Cómo presentar una queja del Título VI

1. Aplicabilidad. Los siguientes procedimientos de reclamos son pertinentes a todas las personas que consideren que han sido sujetas a discriminación por Jewish Family Service of San Diego (JFSSD) con relación a *On the Go*: Transportation Solutions for Older Adults que es financiado total o parcialmente por la Asociación de Gobiernos de San Diego, (San Diego Association of Governments, SANDAG). En general, está diseñado para tratar disputas, incluidas, entre otras, las siguientes:
 - Desacuerdos en relación con un servicio solicitado, sitio o modificación de una práctica o requisito de JFSSD.
 - Falta de accesibilidad a un programa, publicación o actividad.
 - Acoso o discriminación prohibidos según la ley de California o la ley federal.
2. Proceso de revisión preliminar. El siguiente proceso debe completarse antes de presentar un reclamo formal ante SANDAG.
 - Resolución informal: antes de presentar un reclamo formal, la parte demandante deberá comunicarse con el Director de Operaciones para obtener asistencia en la resolución del asunto de manera informal tan pronto como sea práctico, por lo general, dentro de un plazo de quince (15) días calendario a partir de la fecha en que el asunto del reclamo ocurrió o la parte demandante tuvo conocimiento de la presunta falta de cumplimiento por parte de JFSSD en relación con las leyes estatales o federales contra la discriminación.

El Director de Operaciones puede ser contactado en:

Jewish Family Service de San Diego
JOAN Y IRWIN JACOBS CAMPUS
Edificio de Servicios Comunitarios
8788 Avenida Balboa
San Diego, CA 92123
Fax: (858) 637-3001
Email: COOoffice@JFSSD.org

JFSSD le notificará a SANDAG sobre el reclamo dentro de un plazo de setenta y dos (72) horas a partir de su recepción y lo registrará junto con los pasos que se tomaron para su resolución. JFSSD es responsable de informarle a la parte demandante sobre el procedimiento de reclamos de JFSSD, incluida la oportunidad para presentar un reclamo formal ante SANDAG o la Administración Federal de Transporte Público (Federal Transit Administration, FTA) de la manera que se describe a continuación.

- Informe de los resultados a SANDAG y a la parte demandante: JFSSD le enviará a SANDAG y a la parte demandante, a través de correo electrónico o correspondencia, los resultados del proceso de resolución informal dentro de un plazo de treinta (30) días calendario a partir de la recepción del reclamo. Si la parte demandante no está satisfecha con la disposición de JFSSD con relación al asunto, la parte demandante podrá presentar un reclamo formal ante SANDAG según el procedimiento que se describe a continuación.
3. Reclamo formal. Si el procedimiento de revisión preliminar y resolución informal de JFSSD no produce una resolución satisfactoria, la parte demandante podrá presentar un reclamo formal por escrito ante SANDAG de la manera que se describe a continuación. Los materiales de SANDAG están disponibles en otros idiomas. Para hacer una solicitud, llame al (619) 699-1900.
4. Los reclamos deben presentarse dentro de un plazo de diez (10) días calendario a partir de la fecha en que la parte demandante reciba el aviso de finalización del proceso de revisión preliminar descrito anteriormente.
- Los reclamos deben presentarse por escrito y deben incluir una copia de cualquier correspondencia con relación al reclamo a JFSSD.
 - Los reclamos deben presentarse ante el Oficial de Cumplimiento del Título VI de SANDAG en 401 B Street, Suite 800, San Diego, CA 92101; número de fax (619) 699-1995; TTY (619) 699-1904.
 - Investigación: el Oficial de Cumplimiento del Título VI de SANDAG iniciará una investigación, que podrá incluir entrevistar, consultar o solicitar una respuesta por escrito sobre los temas que surgieron en el reclamo a cualquier individuo que el Oficial de Cumplimiento del Título VI de SANDAG considere que tenga información relevante, incluido el Oficial de Cumplimiento de la Ley sobre Estadounidenses con Discapacidades (Americans with Disabilities Act, ADA), personal de [Organización] y miembros del público. SANDAG también podrá sostener una audiencia informal.
 - Panel de revisión: el Oficial de Cumplimiento del Título VI de SANDAG convocará a un panel de revisión que estará compuesto por el Oficial de Cumplimiento del Título VI de SANDAG, el Oficial de Cumplimiento de la ADA, si corresponde, un miembro del personal de administración de SANDAG, el Director Ejecutivo Adjunto (o su designado) y (dependiendo de los temas) cualquier otro personal, según sea necesario. Este panel revisará la solicitud, investigará e intentará resolver los temas dentro de un plazo de treinta (30) días calendario a partir de que SANDAG reciba el reclamo.
 - Representación: la parte demandante y cualquier otra parte a quien esté dirigido el reclamo tendrán derecho a tener un representante.

Conclusiones y notificación: el Oficial de Cumplimiento del Título VI de SANDAG o el Oficial de Cumplimiento de la ADA preparará y le suministrará a la parte demandante, y a todas las otras partes involucradas, un informe final que contenga un resumen de la investigación, conclusiones

por escrito y una disposición propuesta. Este informe se le suministrará a la parte demandante y a JFSSD dentro de un plazo de cuarenta y cinco (45) días calendario a partir de la presentación del reclamo formal.

- Disposición final: la disposición propuesta por el panel de revisión entrará en vigencia de inmediato. La parte demandante o cualquier otra parte a quien esté dirigido el reclamo o la disposición propuesta podrán apelar. La apelación ante el Director Ejecutivo (como se establece a continuación) no suspenderá la implementación de la disposición propuesta por el panel de revisión de SANDAG, excepto en aquellas circunstancias en las cuales el Director Ejecutivo de SANDAG decida que existe un motivo suficiente para que corresponda la suspensión de la implementación.

4. Apelación

- 4.1 Dentro de un plazo de diez (10) días calendario a partir de la emisión del informe final, la parte demandante podrá apelar ante el Director Ejecutivo de SANDAG.
- 4.2 Para que se acepte una apelación, debe presentarse una solicitud de revisión por escrito ante el Director Ejecutivo de SANDAG.
- 4.3 La solicitud de revisión por escrito debe especificar la base particular fundamental, procesal o ambas, de la apelación y debe efectuarse por motivos que no sean la insatisfacción general con la disposición propuesta. Además, la apelación debe estar dirigida solo a los temas planteados en el reclamo formal presentado o a los errores procesales en la gestión del procedimiento de reclamo, y no a temas nuevos.
- 4.4 La revisión del Director Ejecutivo o su persona designada normalmente deberá limitarse a las siguientes consideraciones: ¿Influyeron los hechos y criterios correctos sobre la decisión? ¿Influyeron fundamentalmente hechos o criterios incorrectos o irrelevantes sobre la decisión en perjuicio de la parte demandante? ¿Hubo alguna irregularidad procesal que influyó fundamentalmente sobre el resultado de la cuestión en perjuicio de la parte demandante? Dados los hechos, los criterios y el procedimiento correcto, ¿fue esta la decisión que hubiese tomado razonablemente una persona responsable de tomar decisiones?
- 4.5 Se espera una copia de la decisión por escrito del Director Ejecutivo dentro de un plazo de treinta (30) días calendario a partir de la presentación de la apelación, la cual se enviará a todas las partes involucradas y, si corresponde, a las personas cuya autoridad será necesaria para llevar a cabo la disposición. El Director Ejecutivo podrá extender el plazo por un motivo justificado. La decisión del Director Ejecutivo sobre la apelación será la decisión definitiva de SANDAG.

Presentación de un reclamo ante la FTA. Cualquier persona que considere que ella misma, o cualquier clase específica de personas esté sometida a la discriminación prohibida bajo el Título VI, también podrá presentar un reclamo por escrito ante la FTA. Un reclamo debe presentarse antes de los 180 días a partir de la fecha de la presunta discriminación, a menos que la FTA extienda el plazo de presentación. Los reclamos del Título VI con relación a programas con financiamiento federal en [Organización] podrán enviarse a la agencia de financiamiento que corresponda a:

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

TITLE VI COMPLAINT FORM SPANISH

FORMULARIO DE QUEJAS RELACIONADAS CON EL TÍTULO VI

El Título VI de la Ley de Derechos Civiles de 1964 requiere que “Ninguna persona en los Estados Unidos será excluida de participar en, ni se le negará los beneficios de, o será objeto de discriminación debido a su raza, color u origen nacional, en cualquier programa o actividad que recibe ayuda financiera federal.”

1. Indique su nombre y dirección.

Nombre: _____

Dirección: _____

Nº de teléfono: Casa: () _____ Trabajo: () _____ Otro: () _____

2. Persona(s) discriminada(s), si no son las mismas indicadas anteriormente:

Nombre: _____

Dirección: _____

Nº de teléfono: Casa: () _____ Trabajo: () _____ Otro: () _____

Por favor describa su relación con esta persona(s): _____

3. ¿Tiene que ver su queja con la discriminación en la prestación de servicios o con otros actos discriminatorios por parte del departamento o agencia contra usted o contra otros? Si es el caso, indique abajo la base, en su opinión, de estos actos discriminatorios.

___ Raza/grupo étnico: _____

___ Origen nacional: _____

___ Sexo: _____

___ Religión: _____

___ Edad: _____

___ Discapacidad: _____

4. ¿Cuál es la mejor hora y lugar para comunicarnos con usted sobre esta queja?

5. Si usted está representado por un abogado en este caso, por favor indique lo siguiente:

Nombre: _____

Dirección: _____

Nº de teléfono: () _____

6. Según recuerde, ¿en qué fecha(s) sucedió la discriminación alegada?

Fecha de la discriminación inicial: _____

Fecha de la discriminación más reciente: _____

7. Las quejas de discriminación por lo general deben presentarse durante los ciento ochenta (180) días siguientes a la discriminación alegada. Si la fecha de la discriminación más reciente (mencionada anteriormente) fue hace más de ciento ochenta (180) días, usted puede pedir una dispensa del requisito para presentar la queja durante este tiempo. Si desea solicitar una dispensa, por favor explique por qué esperó usted hasta ahora antes de presentar su queja.

8. Explique lo más claramente posible lo que sucedió, las razones por las que en su opinión sucedió y la manera como usted fue discriminado/a. Indique quiénes son las personas involucradas y explique cómo otras personas recibieron un trato diferente al trato que usted recibió. (Use hojas adicionales si es necesario y adjunte una copia de cualquier documento relacionado con su caso.)

9. Indique los nombres y datos de cualquier persona (testigos, pasajeros que viajaban con usted, empleados y otras personas), si los conocen, con quienes nos podamos comunicar para solicitar más información que fundamente o aclare su queja.

Nombre / Dirección / N° de teléfono

()

10. ¿Tiene usted alguna otra información que le parezca relevante para nuestra investigación sobre sus alegaciones?

11. ¿Qué remedio jurídico o decisión desea usted recibir como resolución final por la discriminación alegada?

12. ¿Ha presentado usted (o la persona sometida a la discriminación alegada) la misma o alguna otra queja ante alguna otra oficina gubernamental (la Administración Federal de Tránsito o el Departamento de Derechos Civiles, entre otras)?

Sí _____ No _____

Si su respuesta es sí, por favor díganos el nombre, la dirección y los datos de la agencia a la cual se presentó la queja y describa la situación actual de esa apelación:

Agencia: _____

Persona de contacto: _____

Dirección: _____

Nº de teléfono: () _____

13. No podemos aceptar su queja sin su firma. Por favor ponga su firma y la fecha a continuación.

Firma

Fecha

Nombre en letra de molde

Adjunte cualquier documento que fundamente su alegación. Firme y feche el formulario y envíelo a la coordinadora de asuntos relacionados con el Título VI:

Dana Toppel, Chief Operating Officer
Jewish Family Service of San Diego
JOAN & IRWIN JACOBS CAMPUS
Community Services Building
8788 Balboa Avenue
San Diego, CA 92123
Fax: (858) 637-3001
Email: COOOffice@JFSSD.org

Alternativamente, devuélvalo a:

Title VI Coordinator
SANDAG
401 B Street, Suite 800
San Diego, CA 92101
Teléfono: 619-699-1900; Fax: 619-699-1995; TTY 619-699-1904

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

Jewish Family Service of San Diego has not been involved in any transportation-related Title VI investigations, lawsuits or complaints.

5 Public Participation Plan

About JFSSD, *On the Go*: Transportation Solutions for Older Adults

Jewish Family Service of San Diego (JFSSD) is a non-profit 501 c (3) organization founded in 1918. Today, it is a comprehensive human services organization with locations throughout San Diego County that serves more than 25,000 people annually. *On the Go*: Transportation Solutions for Older Adults is a JFSSD program to provide transportation services for adults over the age of 60 residing in the following San Diego County zip codes:

North County Inland: 92025, 92029, 92064, 92126, 92127, 92128, 92129, 92131

Eastern San Diego: 91941, 91942, 92103, 92108, 92109, 92111, 92115, 92116, 92119, 92120, 92123, 92124

Northern San Diego: 92007, 92014, 92024, 92037, 92067, 92075, 92091, 92110, 92117, 92121, 92122, 92130

Purpose 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 purpose of this agency to be a "client-centered, impact-driven organization working to build a stronger, healthier, more resilient San Diego."

5a&b Summary of Outreach Efforts

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

San Diego Association of Governments (SANDAG) – Councils & Programs

The JFSSD Senior Director of Social & Wellness Services serves on SANDAG's San Diego Coordinated Plan Ad Hoc group and provides counsel on plan contents and methods of communication regarding community access to the plan.

On the Go's Senior Director of Social & Wellness Services serves as Chair of the Council of Access and Mobility (CAM). CAM is comprised of transportation stakeholders from San Diego to improve the availability, quality and efficient delivery of transportation services to people with disabilities, older adults and people with low incomes.

JFSSD is currently on referral from the Coordinated Transportation Service Agency (CTSA). The CTSA is an information connection for specialized transportation providers. The CTSA offers technical assistance and public outreach in a professional friendly manner as a means of increasing awareness of specialized transportation options.

On the Go staff occasionally attend SANDAG's Social Services Transportation Advisory Council meetings where Council members and members of the public work to respond to federal and state requirements, as well as local concerns, regarding accessibility issues. This Council meets bi-monthly and conducts outreach to minority and low-income populations in order to address unmet needs.

County of San Diego Department of Health & Human Services Agency (HHS)

JFSSD staffs a community outreach booth at the HHS Aging & Independent Service (AIS) annual Aging Summit event.

JFSSD are active members in the following AIS committees and councils: Caregiver Coalition, Fall Prevention Task Force, Health Promotions and Nutrition.

Annual & Quarterly Satisfaction Surveys

On the Go conducts both Annual & Quarterly Satisfaction Surveys with program participants and stakeholders of the agency to determine level of satisfaction and gain input regarding unmet needs.

San Diego City Council & San Diego County Board of Supervisors

JFSSD regularly conducts meetings, attends planning committees and participates in activities and events with Council Members and Supervisors.

San Di-CAN, E-CAN and Nor-CAN

JFSSD participates in these community based action partnerships of providers, volunteers and consumers of services advocating for older adults and people with disabilities.

JFSSD Website

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

General Community Outreach

JFSSD participates in continuous and various outreach activities throughout the county every year including community street fairs, senior health fairs, volunteer recognition events, and presentations for libraries, health care providers, and community clubs/organizations.

6 Language Assistance Plan

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. Jewish Family Service language assistance plan (LAP) includes a four-factor analysis and implementation plan that complies with the requirements of DOT LEP.

Currently, Jewish Family Service of San Diego serves 32 zip codes comprising 1,061,784 individuals.

However, during the term of this Title VI Plan, Jewish Family Service of San Diego will begin serving the entire county, as does the San Diego Association of Governments (SANDAG). SANDAG currently has an excellent LAP in place updated as of August 2015 that analyzes the same population served by Jewish Family Service of San Diego. Jewish Family Service of San Diego has utilized, with permission, SANDAG's population analysis. To review SANDAG's original plan visit

http://www.sandag.org/uploads/publicationid/publicationid_1659_14384.pdf

6a Jewish Family Service of San Diego has developed a plan, utilizing SANDAG's analysis, to address the needs of the LEP populations in San Diego County. Following U.S. DOT LEP Guidance, included in this report are the following five sections:

1. Identifying LEP individuals who need language assistance
2. Providing language assistance measures
3. Training staff

4. Providing notice to LEP persons
5. Monitoring and updating the Plan

Four Factor Analysis

6ai Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the recipient or grantee. Factor 1 Analysis findings indicate that 8 percent of the population speaks English less than well. The top four languages spoken other than English are Spanish, Vietnamese, Tagalog, and Chinese. Combined, these four languages include 86 percent of the LEP population in San Diego. To review SANDAG’s in depth analysis please see Appendix A.

6aii Factor 2: The frequency with which LEP individuals come in contact with the program. *On the Go* currently provides transportation to adults over the age of 60 in 32 zip codes within San Diego County. The majority of participants in the *On the Go* program are not newly immigrated to the United States. *On the Go* participants immigrated anywhere from five to forty years ago. While English is not their native language, it is relatively mastered, at least to a level of spoken comprehension. **Demographic data, including primary language, are collected for JFS/OTG clients. Based on these data, LEP individuals represent 3-4% of the client population for JFS.**

JFS Clients 60+, Primary Language	% of clients
English	70%
Spanish	4%
Russian	3%
Chinese	3%
All others combined (range .01% - 1.2%)	20%

And for OTG, based on these data, LEP individuals represent 1-2% of the client population for JFS.

OTG Clients 60+, Primary Language	% of clients
English	90%
Spanish	1%
Russian	2%
All others combined (range .01% - 1.4%)	7%

During daily operations, *On the Go* encounters the need for translation services sporadically.

Over a 30-day period, staff will receive a request for a Spanish speaking reservationist approximately three times. For the majority of these requests it appears to be the comfort of familiarity of language rather than a necessity to access service. For example, a rider will call in and request a particular reservationist who speaks Spanish. If the Spanish speaking reservationist is unavailable, the staff will offer to take a message and most often the rider will decline to wait for the Spanish speaking reservationist and place their ride request with the Non-Spanish speaking reservationist. Vital Documents are available in Spanish. However, there is no record of the Spanish documents being requested and/or returned in the last ten years.

During periods of particular JFSSD programming, *On the Go* will ask for assistance with translation in Russian. JFSSD has specialized programming for an elderly Russian population and utilizes *On the Go* for transportation. Approximately 25 *On the Go* riders speak Russian, representing approximately 1.25% of *On the Go's* clientele. During these specific programming events (approximately four times per year) a Russian speaking JFSSD staff member is available to explain the transportation service and coordinate reservations. Written translation of documents into Russian has not been required.

6a.iii Factor 3: The nature and importance of the program, activity, or service provided by the recipient to people's lives.

The Aging & Wellness Division of Jewish Family Service of San Diego provides services that maximize independence, dignity, and quality of life for older adults and their families and support their connection to the Jewish and general San Diego Community. Through the Aging & Wellness programs older adults have increased access to services and management of basic needs as a single point of entry. The programs inter-refer clients to appropriate program services as needs are assessed.

As a part of the Aging & Wellness Division, ***On the Go, Transportation Solutions for Older Adults***, specifically addresses access to services and community involvement through mobilizing older adults via

multiple transportation options. For older adults who don't drive, limited mobility is a practical issue that can undermine physical, social and emotional health and can also present barriers to participating in religious, cultural and recreational activities.

As illustrated above by demographic data, we provide those who speak other languages the same services and value that English speaking clients receive.

6aiv Factor 4: The resources available to the recipient and costs. *On the Go* is a tightly budgeted program and unplanned expenditures result in impacts to providing services to older adults. Grant funding, therefore budgets, are often planned up to three years in advance. It is *On the Go's* intention to provide translation services and create vital documents in compliance with Title VI requirements with little to no fiscal impact by collaborating both internally and externally.

Currently, *On the Go* employs one bilingual Spanish speaking staff and one bilingual Russian speaking staff. As a program of JFSSD, *On the Go* relies on JFSSD staff in other programs as a resource for translation of approximately 13 different languages. As the need for written translation arises for languages not utilizing the Latin-based alphabet, *On the Go* will collaborate with other social service agencies, community organizations and newspapers for translation services. Lastly, *On the Go* will utilize Google Translate <https://translate.google.com/> as well as assist clients in using when appropriate.

6b Language Translation Threshold (Safe Harbor Provision)

Based on the analysis conducted in Factor 1, Factor 2 and Factor 3 *On the Go* has determined that the only language to meet its immediate Language Translation Threshold is Spanish. While *On the Go* encounters Russian speaking clients, currently the only language immediately requiring written translation is Spanish. As part of the ongoing monitoring and updating process, *On the Go* will reevaluate this threshold based on LEP tracking data to determine if additional languages should be added.

Vital Documents Guidelines

In accordance with Title VI and Executive Order 13166, *On the Go* will take reasonable steps to ensure that LEP persons receive the language assistance necessary to allow them meaningful access to *On the Go* services. Under this Guidance, an effective LEP Plan includes the translation of "vital" written materials or Vital Documents into the languages of frequently-encountered LEP groups. Federal funding recipients must determine which vital documents should be translated. Failure to ensure that LEP persons can effectively participate in or benefit from *On the Go* programs and activities, by providing language assistance measures or written translations, may violate the prohibition under Title VI against national origin discrimination.

On the Go has identified Spanish as the only language to meet its Language Translation Threshold. Vital Documents are any document that is critical for obtaining services and have been identified as follows:

- Rider Enrollment Packet
- Rider Liability Waiver

- Rider Agreement
- Title VI Plan Notice to the Public
- Title VI Complaint Procedures
- Title VI Complaint Form

The determination of the “vital” status of a document is an ongoing process. Moving forward, other documents will be translated on a case-by-case basis, as these documents are published. In some cases, translation of abbreviated summary document(s) of non-vital documents may be the most appropriate. In some cases, notice of language assistance may be sufficient.

6c Language Assistance Measures

Current and future language assistance measures are outlined in this section of the Language Assistance Plan. To gather all the current language assistance measures, staff who regularly work on outreach efforts and in customer service or customer facing capacities were interviewed and surveyed.

Current Language Assistance Measures

Currently, JFSSD provides a variety of language assistance services including the translation of documents. To date, translation has been primarily in Spanish due to the high concentration of Spanish LEP individuals who utilize JFSSD programs and services.

JFSSD currently has bilingual staff speaking and writing approximately 14 different languages to serve clients on a daily basis with a range of language preferences and other needs.

A recent language census taken by JFS Family & Community Services reports the following languages are spoken and/or read by JFSSD staff:

- Spanish- Spoken & Read
- Filipino (Tagalog)- Spoken & Read
- Mandarin-Spoken
- Arabic-Spoken & Read
- Chaldean-Spoken
- Albanian - Spoken
- Burmese-Spoken & Read
- Cebuano-Spoken & Read
- French-Spoken & Read
- Hebrew-Spoken & Read
- Korean - Spoken & Read
- Portuguese-Spoken & Read
- Russian-Spoken & Read
- Ukrainian-Spoken & Read

JFSSD employees, particularly front-line receptionists, are trained to assess the language/communication needs of an individual and connect them with the appropriate bilingual staff member. The most common language requiring assistance is Spanish.

Jewish Family Service of San Diego oversees multiple programs, activities and services. The chart below details some of the LEP public outreach components Jewish Family Service of San Diego's *On the Go* currently has in place.

Program, Activity, Service	LEP Component
Outreach and Public Appearances	<ul style="list-style-type: none"> • Bilingual English/Spanish staff attending. • Flyer in Spanish educates about and invites eligible community members (60+ years) to call in and learn more about the program.
Quarterly & Annual Quality / Satisfaction Surveys	<ul style="list-style-type: none"> • Quarterly Survey's by mail provided in both English and Spanish. • Annual Survey's by phone conducted by bilingual English/Spanish staff.
Intake / Enrollment/ General <i>On the Go</i>	<ul style="list-style-type: none"> • Enrollment forms provided in both English and Spanish. • Assistance in completing forms available from bilingual English/Spanish staff. • Bilingual English/Spanish reservationists on staff to provide assistance by phone and in person. • Internal translation review by native Spanish speakers. • Agency web site provides notice of the availability of translation of <i>On the Go</i> materials in English and Spanish. • Agency web site posts notice of Title VI rights, complaint procedures and complaint form in English and Spanish.

Future Language Assistance Measures

1. Review Vital Documents Guidelines to determine if any additional documents need to be translated
2. Establish a self-monitoring mechanism for project managers to document LEP participation at all community meetings through sign-in sheets
3. Create community specific guidelines and key partner contacts for project managers to use when working in neighborhoods with high concentrations of LEP residents
4. Increase usage of Spanish language media announcements when possible

5. Place multi-language information and notices in publications serving LEP populations to increase comfort levels regarding access to information in a native language
6. Update Public Participation Plan if required as a result of Four Factor Analysis
7. Create staff Language Assistance Guidelines for how to interact and provide services to LEP populations
8. Consider making a language line (e.g., Language Line Solutions) available to provide immediate interpretation in Spanish, Vietnamese, Tagalog, Chinese and Arabic to meet the needs of the top five LEP populations San Diego county.
9. Pursue further language assistance and translation, if needed, with community-based organizations (CBO's) with which JFS partners for the benefit of specific cultural communities.

6d Providing Notice to LEP Persons

On the Go currently provides notice to LEP individuals in a number of ways. These include:

- Translated program fact sheets and vital documents as identified above
- Access to multiple language customer service representatives
- Presence at community events with LEP attendees
- Some web translations
- Providing notice of the availability of translation services in marketing materials

Moving forward, several other methods will be implemented to provide notice to LEP persons.

6e Monitoring/Updating the Plan

The Four Factor Analysis and Language Assistance Plan, upon implementation, will be monitored and calendared for review every three years.

The Plan will be monitored using the following measures:

- Assigning a staff person (LAP Coordinator) to provide day-to-day administration of the Plan to ensure compliance and correct implementation
- Seeking feedback from LEP communities regarding the effectiveness and usefulness of the LAP when possible
- Seeking staff feedback to determine the effectiveness and usefulness of the Language Assistance Plan Establishing a procedure requiring all written translation requests be routed through and managed by a single LAP Coordinator to ensure consistency
- Utilizing LEP Language Assistance Guidelines for all staff

The following is a list of the elements to be reviewed regularly:

- Assessment of the number of LEP persons eligible to be served by *On the Go*
- The frequency of encounters with LEP language groups
- Nature and importance of activities to LEP persons
- Availability of resources, including technological advances and sources of additional resources, and the costs imposed
- Assessment of the language needs of LEP individuals in order to determine whether interpreters and/or translated materials are needed.
- Assessment of whether existing language assistance services are meeting the needs of LEP individuals
- Assessment of whether staff members understand LEP policies, procedures, and how to access and carry them out
- Assessment of whether language assistance resources and arrangements for those resources are current
- Feedback from LEP communities and community organizations about the Language Assistance Plan
- Define a system for ensuring ongoing translation or oral interpretation for vital documents

6f Training Staff

Currently, Jewish Family Service and *On the Go* reception desk and customer service staff have been provided instruction on how to address LEP populations.

JFS, which started as a refugee resettlement agency nearly 100 years ago, has been serving culturally diverse populations since its inception. As such, JFS is committed to providing bilingual/bicultural services as a part of all of its programs to best serve the linguistically isolated and diverse needs in San Diego County.

Moving forward, a number of policies will be implemented to train staff on working with LEP populations. These include:

- Create LEP Language Assistance Guidelines for all *On the Go* staff to reference
- Providing an initial Language Assistance Plan training to all *On the Go* staff
- Annual LEP training during *On the Go* staff meetings.

- Integrating LEP training into monthly staff meetings identifying any LEP issues, assessing the effectiveness of LEP training materials and updating as necessary

The initial training of *On the Go* staff on the Language Assistance Plan and how to work with LEP individuals will include the following elements:

- A summary of *On the Go's* responsibilities under the U.S. DOT LEP Guidance
- A summary of *On the Go's* Language Assistance Plan
- A summary of *On the Go's* Four Factor Analysis
- A description of the type of language assistance *On the Go* currently provides and instructions on how staff can access these products and services
- How to respond to calls from LEP persons
- How to respond to correspondence from LEP persons
- How to respond to LEP persons in person
- How to document the needs of LEP persons
- How to respond to Civil Rights Act Title VI complaints

Changes to the Language Assistance Plan will be made based on the input provided from staff and LEP persons.

7 Membership of Non-Elected Committees and Councils

Jewish Family Service does not have a non-elected transit related advisory council at this time.

8 Title VI Equity Analysis

Jewish Family Service does not have transit related facilities.



BOARD RESOLUTION
AUTHORIZING THE TITLE VI COMPLIANCE PLAN FOR JFS

Jewish Family Service of San Diego 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."

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

Therefore, be it resolved by the Board of Directors that:

1. The Chief Executive Officer (CEO) is authorized to implement the components of the plan in order to meet Federal requirements.
2. The Chief Executive Officer (CEO) is authorized to implement policies that may be necessary to comply with subsequent revisions or interpretations of the Civil Rights Act.

PASSED AND ADOPTED by the Board of Directors of Jewish Family Service, State of California, on April 16, 2019.



Marcia Foster Hazan, Secretary of the Board

Appendix A

SANDAG Analysis Detail

Identifying LEP Individuals Who Need Language Assistance

There were several key findings revealed in the analysis of the data:

- More than 750,000 persons or 23.5 percent of the San Diego region, are foreign born;
- 38 percent of persons in San Diego County speak a language other than English at home, 16 percent of the County’s population speak English less than “very well” (includes those that speak English “well,” “not well” and “not at all”);
- 8.05 percent speak English less than “well” (includes those that speak English “not well” and “not at all”);
- Spanish is the second most predominant language, other than English, spoken in the region;
- Of the languages spoken in the region, Table 1 shows the languages with over 1,000 LEP persons; and
- San Diego County Public School and Behavioral Health Services data primarily confirms the ACS data above.

Table 1 LEP Speakers by Language in San Diego County

Language*	LEP Population	Percent of All LEP Speakers	Percent of Total Population (Age 5+)
Spanish	174,923	73.1%	5.89%
Vietnamese	15,723	6.6%	0.53%
Tagalog	9,140	3.8%	0.31%
Chinese	5,857	2.4%	0.20%
Arabic	5,592	2.3%	0.19%
Korean	3,464	1.4%	0.12%
Syriac	2,730	1.1%	0.09%
Persian	2,252	0.9%	0.08%
Russian	1,651	0.7%	0.06%
Mandarin	1,518	0.6%	0.05%
Japanese	1,477	0.6%	0.05%
Laotian	1,467	0.6%	0.05%
Cantonese	1,118	0.5%	0.04%

Language*	LEP Population	Percent of All LEP Speakers	Percent of Total Population (Age 5+)
Cushite	1,115	0.5%	0.04%
Hindi	1,046	0.4%	0.04%

Source: 2013 ACS 3-Year Public Use Microdata Sample (PUMS) *Restricted to languages spoken by at least 1,000 limited English speakers

LEP POPULATION SOURCES

Several data sources were utilized to conduct the Factor 1 Analysis in San Diego County to understand the number or proportion of LEP persons eligible to be served by SANDAG or encountered by a SANDAG program or service. Unlike the evaluation of any particular defined geographical area (such as a transit district) the SANDAG analysis is inclusive of only one county (San Diego County), which simplified some of the data analysis.

Based on FTA guidelines, several federal, state, and local data sources were evaluated, including:

- U.S. Census, 2013 American Community Survey (ACS) 3-Year Public Use Micro Sample (PUMS)
- California Department of Education (CDE) English Learner Data, 2015-2016
- San Diego County Department of Mental Health, Database of Interpreter Services, Fiscal Years 2012-2014.

LEP POPULATION ANALYSIS

ACS 2011-2013

The U.S. DOT describes LEP as having a limited ability to read, write, speak, or understand English. The U.S. DOT and FTA (in both the LEP guidance and Title VI Circular), define this population as people who reported that they speak English “not well” or “not at all.” Table 2 shows this analysis for San Diego County. The table shows that the overall LEP population in the County is 8.05percent of persons age five years and older.

Table 2 Community Survey 2013 3-Year Estimates, Age by Language Spoken

County	Total Population Age 5 and Over	Speaks English Only	Speaks English		Percentage Less than “Well”
			“Well” or “Very Well”	Less than “Well”	
San Diego	2,966,752	1,848,070	879,874	238,808	8.05%

Source: U.S. Census Bureau, 2013 ACS 3-Year Estimates, B16004

The data shown in Table 2 also is available for four language types: Spanish, Indo-European, Asian or Pacific Islander, and Other Languages. This analysis is shown in Table 3, which revealed that the Spanish LEP percentage is the highest at 5.84 percent of the total San Diego County population.

Table 3
English Proficiency by Language Category in the San Diego Region

English Proficiency	Spanish		Indo-European		Asian or Pacific Islander		Other Languages	
	Population	% Total Population	Population	% Total Population	Population	% Total Population	Population	% Total Population
Speak English "Very Well"	416,815	14.05%	68,165	2.30%	127,453	4.30%	25,919	0.87%
Speak English "Well"	146,495	4.94%	16,382	0.55%	66,170	2.23%	12,475	0.42%
Limited English Proficient								
Speak English "Not Well"	119,119	4.02%	7,541	0.25%	36,096	1.22%	7,751	0.26%
Speak English "Not at All"	54,265	1.83%	2,231	0.08%	8,251	0.28%	3,554	0.12%
LEP Subtotal	173,384	5.84%	9,772	0.33%	44,347	1.49%	11,305	0.38%
Total	736,694	24.83%	94,319	3.18%	237,970	8.02%	49,699	1.68%

The ACS data also includes information on languages spoken for 39 different language groups (but not by ability to speak English per the U.S. DOT guidance definition as previously mentioned). Table 4 shows the top five non-English languages spoken at home in the San Diego region based on data collected from 2011-2013 among the total population ages five and older (including both LEP and non-LEP populations). While there were respondents from all 39 language groups, Spanish, Tagalog, Vietnamese, Chinese and Arabic were the primary languages.

Table 4 Languages Spoken at Home in the San Diego Region

Language	Language Spoken at Home for the Population 5 and Over	Percent of Total Population
Spanish or Spanish Creole	736,694	24.83%
Tagalog	93,144	3.14%
Vietnamese	44,925	1.51%
Chinese	40,228	1.36%
Arabic	17,696	.73%
All Other Languages	181,897	6.13%

Source: 2013 ACS 3 Year Estimates, Table B16001

Figure 1 below shows the presence of all LEP persons in the County using Census tracts 2013 5-Year data. The map illustrates the Census tracts where the proportion of the population speaking English less than “very well” for all languages is greater than 16.25 percent, the service area average. Figure 2 shows the Census Tracts where the proportion of LEP Spanish speakers who speak English less than “well” is greater than 10.91 percent, the service area average.

Figure 1 - Limited English Proficient (LEP) Census Tracts

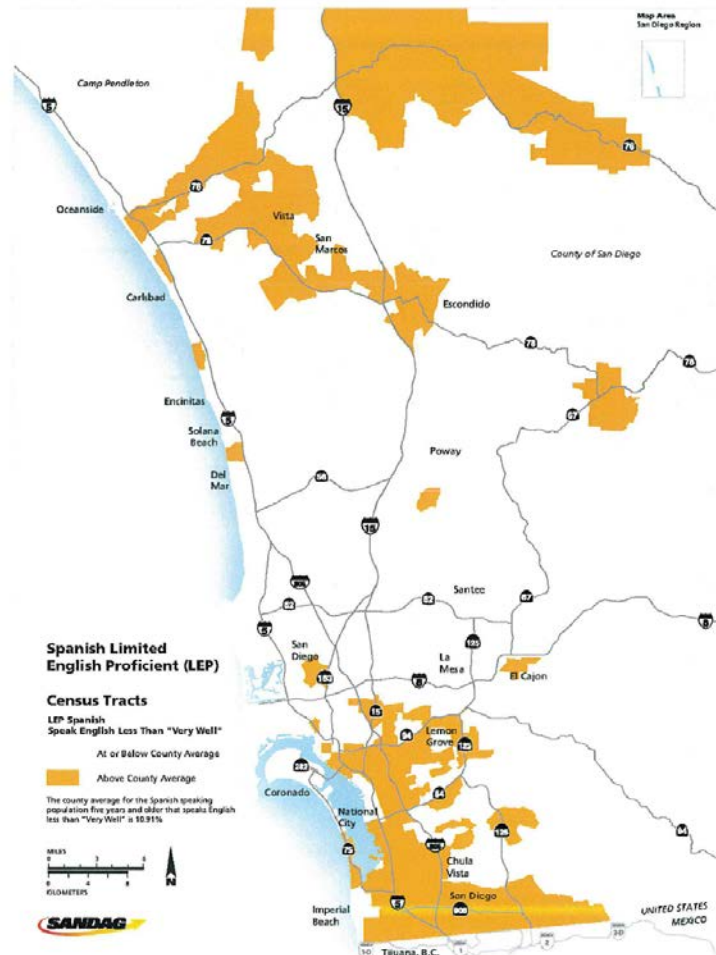
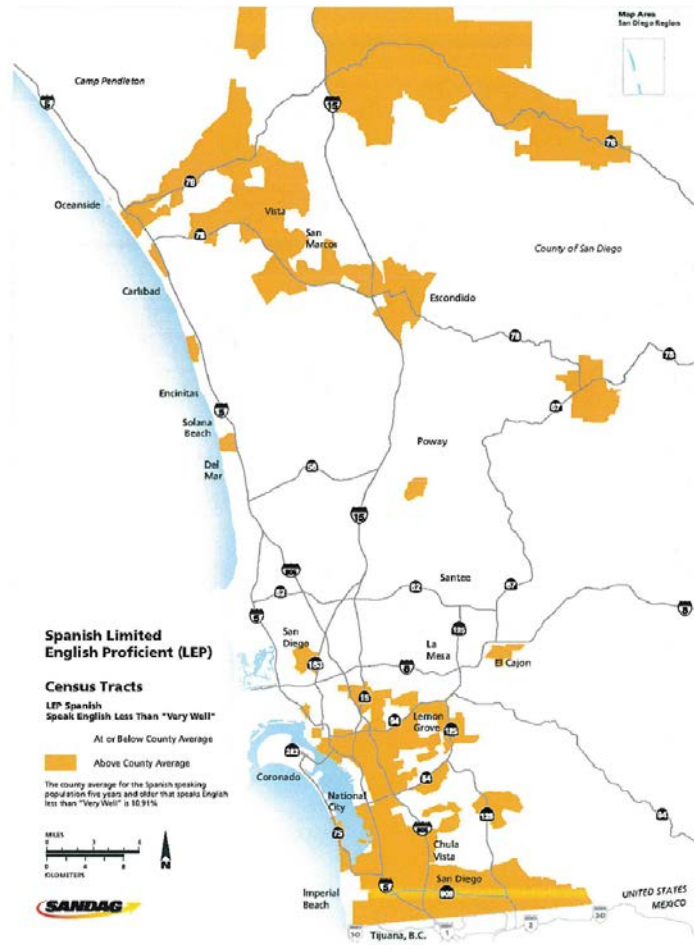


Figure 2 - Spanish Limited English Proficient Census Tracts



California Department of Education (CDE) English Learner Data

The California Department of Education (CDE) English Learner data was analyzed to enhance the language list obtained through the Census, ACS, and U.S. DOL. In particular, the CDE data was used to determine the existence of other prevalent languages that may have fallen under the more vague Census categories such as “Other and Unspecified Languages” and “African Languages.” Table 5 shows the top 10 languages including the number of students who identify as speaking a particular language at home, along with the associated percentages.

Table 5 English Learner Data for San Diego County Public Schools

Language	English Learners by Language	Percent of English Learners
Spanish	89,972	80.8%
Arabic	3,077	2.7%
Tagalog	2,901	2.6%
Vietnamese	2,495	2.2%
Chaldean	2,022	1.8%
Other non-English Languages	1,742	1.5%
Somali	1,138	1.0%
Mandarin	1,039	0.9%
Korean	797	0.7%
Farsi	773	0.6%

Source: California Department of Education (CDE) English Learner data for San Diego County, 2015-2016

The majority (81%) of limited English speakers are native Spanish speakers. The number is down slightly from 84 percent identified in the 2014 CDE analysis. The analysis of the CDE English Learner data roughly correlates to the analysis of Census LEP speakers (by languages spoken) shown in Table 1. The CDE data, unlike the ACS data, shows that the Somali and Chaldean languages are included in the top ten list of languages for school children. Percentages for these two languages are consistent with the percentages included in the Census data under the names Cushite (Somali, 0.5 percent and Syriac (Chaldean, 1.1 percent). The Cushitic languages are a branch of the Afro-Asiatic language family spoken primarily in the Horn of Africa. It is therefore possible that Somali could be substituted for Cushite. Similarly, Syriac is a Middle-Eastern language considered Chaldean or Aramaic by the Middle Eastern community.

San Diego County, Department of Behavioral Health Interpreter Services

Table 6 shows the top ten languages requested for translation in fiscal years 2012-2014 through the Department of Behavioral Health Services.

**Table 6 San Diego County Department of Behavioral Health
Interpretation Services Requested by Language**

Language	Languages by Translation Services Requested	Percent of Translation Services Requested
Spanish	21,582	45.
Arabic	9,638	20.0
Vietnamese	6,301	12.7
Cambodian	3,988	8.7
Farsi	1,744	2.7
Laotian	1,542	3.7
Tagalog	456	1.0
Somali	392	1.0
Chaldean	184	0.3
Mandarin	125	0.3
Totals	45,952	95.3

Source: San Diego County, Department of Behavioral Health, Interpretation Services,
Fiscal Years 2012-2014

The data roughly correlates to the ACS identification of LEP individuals by language type. The interpretation services data includes Somali, Chaldean, Cambodian and Farsi in the top ten, each of which were not identified in the top ten ACS data. As discussed in the CDE analysis, it is possible that Cushite and Somali and Syriac and Chaldean are the same languages. The majority of the translation requests tracked by the Department of Behavioral Health Services, 45 percent, are for Spanish. This is consistent with the ACS and CDE data.

CONCLUSION

The analysis of the data sources discussed revealed 15 specific languages in San Diego County with more than 1,000 individuals who are LEP. Those languages and corresponding LEP populations are shown in Table 7 below.

Table 7 Languages in San Diego County with more than 1,000 LEP Persons

Language	LEP Population	Percent of All LEP Speakers	Percent of Total Population (Age 5+)
Spanish	174,923	73.1%	5.89%
Vietnamese	15,723	6.6%	0.53%
Tagalog	9,140	3.8%	0.31%
Chinese	5,857	2.4%	0.20%
Arabic	5,592	2.3%	0.19%
Korean	3,464	1.4%	0.12%
Syriac	2,730	1.1%	0.09%
Persian	2,252	0.9%	0.08%
Russian	1,651	0.7%	0.06%
Mandarin	1,518	0.6%	0.05%
Japanese	1,477	0.6%	0.05%
Laotian	1,467	0.6%	0.05%
Cantonese	1,118	0.5%	0.04%
Cushite	1,115	0.5%	0.04%
Hindi	1,046	0.4%	0.04%

Source: 2013 ACS 3-Year Public Use Microdata Sample (PUMS) *Restricted to languages spoken by at least 1,000 limited English Speakers

The languages included in Table 7 were identified through ACS data for individuals who reported speaking English “not well” or “not at all.” This analysis was based on the LEP definition included in U.S. DOT LEP guidance. Spanish speakers remain the largest LEP population in San Diego by a significant margin. Outliers identified in the analysis of CDE and County data indicate higher than average pockets of LEP populations who access certain programs and services.

The 15 languages included in Table 7 will be further evaluated in Factors 2, 3, and 4 per the recommended U.S. DOT LEP guidance.