

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: March 2022

Approved by Jewish Family Service of San Diego Board of Directors: 03/15/22

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JOAN & IRWIN JACOBS CAMPUS

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INTRODUCTION

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



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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](http://www.jfssd.org/site/PageServer?pagename=programs%20older%20on%20the%20go)

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: danat@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's civil rights program, and the procedures to file a complaint, contact us by phone at (858) 637-3000 or email at danat@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 below.

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: danat@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 de derechos civiles de Jewish Family Service of San Diego y los procedimientos para presentar una queja, contáctenos por teléfono al (858) 637-3000 o envíe un correo electrónico a danat@jfssd.org o visite nuestra oficina administrativa en JOAN & IRWIN JACOBS CAMPUS, Edificio de Servicios Comunitarios, 8788 Balboa Avenue, San Diego, CA 92123
- 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:

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: danat@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
4669 Murphy Canyon Rd, San Diego, CA 92123
- **2c** JFSSD Aging & Wellness Center located at:
8788 Balboa Ave., San Diego, CA 92123
- **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
4669 Murphy Canyon Rd, San Diego, CA 92123

3 Title VI and ADA 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 or ADA Complaint?

Applicability. The following complaint procedures are applicable to all persons who believe that they have been subject to discrimination on the basis of race, color, and national origin by Jewish Family Service of San Diego (JFSSD) related to its *On the Go* transportation program, which is funded in whole or in part by SANDAG.

How to File a Title VI Complaint

1. **Preliminary Review Process.** The following process must be completed prior to filing a Formal Complaint with SANDAG.
 - 2.1 Informal Resolution: Prior to submitting a formal complaint, the complaining party shall contact the Jewish Family Service of San Diego (JFSSD) 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 JFSSD's alleged non-compliance with state or federal non-discrimination laws. Complaints must be filed within 180 days of the alleged incident.

The JFSSD Title VI Coordinator can be reached at:

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

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 above address for JFSSD to properly investigate any allegation of discrimination.

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) as described 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 of any planned extension to the thirty (30) day rule.

How Will the Complainant Be Notified of the Outcome of the Complaint?

- 2.2 Report of Results to SANDAG and Complaining Party – JFSSD will email or mail SANDAG and the complaining party the results of the informal resolution process 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 following the procedure described below.

SANDAG Title VI Complaint Procedures

3. **Formal Complaint.** If the procedure for Preliminary Review and informal resolution by JFSSD does not yield a successful resolution, then 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.
 - 3.1 Complaints must be filed within 180 calendar days of the alleged incident of notice of the end of the Preliminary Review process described above.
 - 3.2 Complaints must be in writing and must include an attached copy of any correspondence concerning the complaint with JFSSD.
 - 3.3 Complaints must be filed with the Discrimination Compliance Officer – Special Office of General Counsel, SANDAG at 401 B Street, Suite 800, San Diego, CA 92101; Fax number (619) 699-1995; TTY (619) 699-1904.
 - 3.4 Investigation – The SANDAG Discrimination 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 Discrimination Compliance Officer believes to have relevant information, including the applicable Compliance Officers, JFSSD staff and members of the public. SANDAG may also hold an informal hearing.

- 3.5 Review Panel – The SANDAG Discrimination Compliance Officer will convene a review panel that will consist of the applicable Compliance Officers, 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.
 - 3.6 Representation – The complaining party, and any party against whom the complaint is directed, have the right to have a representative.
 - 3.7 Findings and Notification – The SANDAG Discrimination 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.
 - 3.8 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.
4. **Appeal.** Within 10 calendar days of the issuance of the final report, the complaining party may appeal to the SANDAG Executive Director.
- 4.1 An appeal is taken by filing a written request for review by the SANDAG Executive Director.
 - 4.2 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.
 - 4.3 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?

- 4.4 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.
5. **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 AND ADA COMPLAINT FORM ENGLISH 7.1.22

Title VI and ADA 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 _____

Is this an ADA complaint ☐ Yes ☐ No

Describe 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 the back of the form if more space is needed.)

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

If yes, please 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
8804 Balboa Avenue
San Diego, CA 92123

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

Discrimination Compliance Officer – Special Office of General Counsel
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

Procedimientos de Quejas del Título VI y la ADA

Jewish Family Service de San Diego cuenta con un Procedimiento de Quejas del Título VI, que describe un proceso para la disposición local de las quejas del Título VI y es consistente con las pautas que se encuentran en la Circular de la Administración Federal de Tránsito 4702.1B, con fecha del 1 de octubre de 2012.

¿Cuándo es Apropiado 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 raza, color y origen nacional 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).

Cómo presentar una queja del Título VI

2. **Proceso de revisión preliminar.** El siguiente proceso debe completarse antes de presentar un reclamo formal ante SANDAG.
 - 2.1 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:

Dana Toppel, Chief Operating Officer
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: danat@jfssd.org

NOTA: JFSSD alienta a todas las personas que presenten una queja por discriminación a usar el correo certificado a través del Servicio Postal de los EE. UU. y/o asegurarse de que toda la

correspondencia escrita se pueda rastrear fácilmente. Para las quejas presentadas originalmente por fax o correo electrónico, también se debe enviar por correo una queja original y firmada al Coordinador del Título VI lo antes posible, pero a más tardar ciento ochenta (180) días a partir de la supuesta fecha de discriminación.

Los formularios y procedimientos de quejas del Título VI de JFSSD se pueden solicitar por teléfono, por escrito o a través del sitio web de la agencia.

Se puede presentar un formulario de queja de la agencia por escrito y firmado hasta ciento ochenta (180) días a partir de la fecha de la supuesta discriminación. JFSSD solo procesará formularios completos de quejas de la agencia.

El Formulario de Quejas del Título VI se puede usar para enviar la información de la queja. La queja debe presentarse por escrito ante JFSSD en la dirección anterior para que JFSSD investigue adecuadamente cualquier alegación de discriminación.

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.

¿Qué Sucede con la Queja Después de que se Presenta?

Todas las quejas que aleguen discriminación por motivos de raza, color u origen nacional en un servicio o beneficio de transporte proporcionado por JFSSD serán abordadas directamente por JFSSD para su investigación. JFSSD también brindará la asistencia adecuada a cualquier persona que presente una queja, incluidas aquellas personas con discapacidades o que tengan una capacidad limitada para comunicarse en inglés.

JFSSD hará todo lo posible para abordar todas las quejas de manera oportuna y completa. Se enviará por correo una carta acusando recibo de la queja dentro de los diez (10) días. Tenga en cuenta que si una persona que ha presentado una queja no responde a ninguna solicitud de información adicional de JFSSD dentro de los diez (10) días, la queja puede cerrarse y no se llevará a cabo ninguna investigación adicional.

JFSSD tiene treinta (30) días para investigar la queja. El denunciante será notificado por escrito de la causa de cualquier extensión planificada a la regla de los treinta (30) días.

¿Cómo se Notificará al Denunciante sobre el Resultado de la Denuncia?

- 2.2 Informe de resultados para SANDAG y la parte reclamante: JFSSD enviará por correo electrónico o correo postal a SANDAG y a la parte reclamante los resultados del proceso de

resolución informal dentro de los 30 días calendario posteriores a la recepción de la queja. Existen varios métodos de resolución.

1. **Quejas Comprobadas:** Si la queja está fundamentada y parece que se ha producido discriminación por motivos de raza, color u origen nacional, este programa y los procedimientos del Título VI que prohíben la discriminación se revisarán con el infractor. Se tomarán las medidas disciplinarias y/o capacitación apropiadas de acuerdo con los procedimientos disciplinarios de la agencia.
2. **Quejas sin Fundamento:** Si no hay pruebas suficientes para probar o refutar la(s) acusación(es) de discriminación del Título VI, ambas partes de la queja serán informadas del motivo(s) de esta disposición.
3. **Queja infundada:** Si se determina que un acto denunciado de conformidad con este programa/procedimiento del Título VI en realidad no ocurrió, se hará una determinación de “infundada”.

Si se determina que una queja no tiene fundamento, JFSSD enviará una carta notificando a la persona que presenta la queja. En la carta, también se informará a la persona que presentó la denuncia sobre su derecho a:

1. Proporcionar información adicional a JFSSD para la consideración de la queja dentro de los diez (10) días calendario posteriores a la recepción de la decisión final por escrito del Coordinador del Título VI, y/o
2. Presentar una queja externamente ante SANDAG, el Departamento de Transporte de los EE. UU. y/o la FTA.

¿Qué sucede si el demandante no está satisfecho con el hallazgo de JFSSD?

Si la parte reclamante no está satisfecha con la disposición del asunto por parte de JFSSD, la parte reclamante puede presentar una queja formal siguiendo el procedimiento que se describe a continuación.

Procedimientos de quejas del Título VI de SANDAG

- 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. Los materiales de SANDAG están disponibles en otros idiomas. Para aplicar, llame al 619-699-1900.
- 3.1 Los reclamos deben presentarse dentro de los 180 días calendario posteriores al supuesto incidente de notificación del final del proceso de Revisión Preliminar descrito anteriormente.
 - 3.2 Los reclamos deben presentarse por escrito y deben incluir una copia adjunta de cualquier correspondencia con relación al reclamo a JFSSD.
 - 3.3 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.
 - 3.4 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 JFSSD y miembros del público. SANDAG también podrá sostener una audiencia informal.
 - 3.5 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.
 - 3.6 Representación: la parte demandante y cualquier otra parte a quien esté dirigido el reclamo tendrán derecho a tener un representante.
 - 3.7 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.

- 3.8 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. 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.

- 4.1 Para que se acepte una apelación, debe presentarse una solicitud de revisión por escrito ante el Director Ejecutivo de SANDAG.
- 4.2 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.
- 4.3 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?
- 4.4 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.

5. 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 JFSSDpodrán 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 Queja del Título VI

Nombre: _____ Fecha: _____

Dirección: _____

Ciudad: _____ Estado: _____ Código Postal: _____

Nº de teléfono: (____) _____ Mejor hora para llamar: _____

¿Fue discriminado por:

☐ Raza ☐ Origen Nacional ☐ Color ☐ Otro (por favor explique) _____

Fecha del presunto incidente: _____

Describa lo más claramente posible lo que sucedió y cómo fue discriminado. Indique quién estuvo involucrado. Asegúrese de incluir los nombres y la información de contacto de los testigos. (utilice el reverso del formulario si necesita más espacio).

¿Ha presentado esta queja ante alguna otra agencia federal, estatal o local? **(Circule uno) Si/No**

En caso afirmativo, indique la agencia/agencia(s) y la información de contacto a continuación:

Agencia _____ Nombre de Contacto _____

Dirección _____

Ciudad _____ Estado _____ Código Postal _____ Telefono _____

Agencia _____ Nombre de Contacto _____

Dirección _____

Ciudad _____ Estado _____ Código Postal _____ Telefono _____

Por favor firme abajo. Puede adjuntar cualquier material escrito u otra información que considere relevante para su queja.

Firma

Fecha

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: danat@jfssd.org

Alternativamente, el Formulario de Queja del Título VI se puede presentar por escrito con SANDAG en la siguiente dirección:

Discrimination Compliance Officer – Special Office of General Counsel
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's *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 served more than 46,500 people last year. *On the Go*: Transportation Solutions for Older Adults is a JFSSD program that provides 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, 91945, 92019, 92020, 92021, 92040, 92071, 92102, 92103, 92104, 92105, 92108, 92111, 92114, 92115, 92116, 92117, 92119, 92120, 92123, 92124, 92139

Northern San Diego: 92007, 92014, 92024, 92037, 92067, 92075, 92091, 92106, 92107, 92109, 92110, 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 Public 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, many meetings allow community members to participate. 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.

Councils & Programs

On the Go's Senior Director of Nutrition and Aging Care Services and Director of Transportation attend Council on Access and Mobility (CAM) meetings. CAM is comprised of transportation stakeholders from San Diego working together 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 resource 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's Senior Director of Nutrition and Aging Care Services occasionally attends 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 staff are active members in the following AIS committees, subcommittees, and councils: Caregiver Coalition; County of San Diego's AIS Advisory Council, including work on the Health and Nutrition Subcommittee; Fall Prevention Task Force; the County of San Diego's Dementia Friendly Theme Team; Young Professionals for Seniors. These community meetings provide JFSSD *On the Go* staff with a variety of stakeholders to engage with. Community members are invited to share input.

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. These meetings provide *On the Go* staff with outreach to potential clients and other older adult agencies. Meetings are open to the public and virtual.

San Diego County Volunteer Driver Coalition (SDCVDC)

The *On the Go* Director of Transportation chairs the SDCVDC which comprises San Diego County organizations that provide transportation for older adults. The Coalition meets on a regular basis to support one another and share best practices. The Coalition also organizes and hosts a yearly volunteer training and appreciation event.

5c&d Program Marketing & Outreach

JFSSD Website

Currently, JFSSD posts notices and announcements on the agency's website regarding enrolling in the program, outlining services and providing contact information. Information is provided in English. The JFSSD website also has outreach information in Spanish and a Spanish contact form. Additional public input can be obtained by the Title VI Complaint Form, which is available as a download in both English and Spanish.

General Community Outreach

JFSSD participates in continuous and various outreach activities throughout the county every year including senior health fairs, Villages, volunteer recognition events, and presentations for libraries, health care providers, and community clubs/organizations. JFSSD *On the Go* has a Facebook page that highlights ride information, volunteer information and community resources targeted to individuals 60 years and older. The JFSSD marketing team engages with local community papers, Union Tribune and Spanish-language media when sending press releases and program information. JFSSD also conducts outreach through television and radio interviews. These various efforts provide a variety of ways for potential riders to learn about *On the Go* services. JFSSD also creates rider marketing materials in English and Spanish. Please see **Appendix B**

5e&f Program Monitoring

On the Go conducts Quarterly Satisfaction Surveys with program participants and agency stakeholders to determine level of satisfaction and gain input regarding unmet needs. Quarterly surveys focus on questions about program satisfaction and impact. Program satisfaction includes inquiries about the driver's punctuality, rider's feeling of safety, if the rider would recommend the service to others and how the rider would rate the program. Impact questions focus on if the program increased the rider's sense of community, if the program helped the rider maintain independence and if the program helped the rider maintain their health. Surveys are sent in English and Spanish to individuals that received a ride in the last quarter. Riders can mail back the completed survey. Survey results are tabulated and compared with previous quarters to ensure that the riders continue to express satisfaction and high impact from the service.

Furthermore, JFSSD *On the Go* staff are available via telephone for all client feedback. Feedback is captured within the ride scheduling software and reviewed by program leadership. In the event that a client with limited English proficiency calls with feedback, bilingual staff are available to receive and document the feedback. In the future, staff will continue to explore ways for LEP clients to easily provide program feedback.

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 "utiliz[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's Language Assistance Plan (LAP) includes a four-factor analysis and implementation plan that complies with the requirements of DOT LEP. JFSSD offers programs throughout County of San Diego, as does the San Diego Association of Governments (SANDAG). SANDAG currently has an excellent LAP in place updated as of December 2019 and has created a guide to creating Title VI plans. These were referenced to pull census information.

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 as described in 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 the program.

Factor 1 Analysis of Census data from 2015-2019 was gathered to help better understand the LEP population. The analysis found more than 12% (12.32%) of the population (5 years and older) in the *On the Go* service area speaks limited English. A further analysis was conducted to compare the *On the Go* service area with the entirety of San Diego County. This analysis also which found that the county has about a 12% LEP population.

In the *On the Go* service area, the top five languages spoken other than English by LEP speakers are Spanish at 5.50%, Vietnamese at 1.26%, Chinese at 1.13%, Tagalog at 0.95%, Other Indo-European at 0.79% and Arabic at 0.70%.

Table 1

LEP Speakers by Language in OTG Service Area (5 years and older)

Primary Language (ranked by highest number of LEP Persons*)	Total LEP Speakers (OTG Service Area)	% of All LEP Persons (OTG Service Area)	% of Total OTG Service Area Population	Total LEP Speakers (SD County)	% of Total SD County Population
Spanish	92,764	44.62%	5.50%	245,246	7.82%
Vietnamese	21,403	10.30%	1.26%	24,601	0.78%
Chinese	19,025	9.15%	1.13%	22,033	0.70%
Tagalog	15,973	7.68%	0.95%	29,583	0.94%
Other Indo-European	13,338	6.42%	0.79%	16,898	0.54%
Arabic	11,865	5.71%	0.70%	15,274	0.49%
Other Asian/PI	11,334	5.45%	0.67%	14,978	0.48%
Other/Unspecified	10,062	4.84%	0.60%	13,757	0.44%
Korean	5,107	2.46%	0.30%	7,824	0.25%
Russian/Polish/Slavic	5,031	2.42%	0.30%	7,066	0.22%
German/Other West Germanic	1,025	0.49%	.060%	836	0.026%
French/Haitian/Cajun	949	0.46%	.056%	1,110	0.035%
Totals	207,876	100%	12.32%	399,206	12.73%

*Source: Table C16001, 2015-19 ACS 5-Year Estimates

*Source: Table B16004, 2015-2019 ACS-Year Estimates

A further analysis was conducted to identify areas that have high concentrations of individuals that speak Spanish to help determine outreach strategies. The census data identified four zip codes (92025, 92102,

92105, 92114) with high populations of Spanish speakers (more than 20,000 per zip code). These four zip codes contain 31.86% of Limited English Spanish speakers age 65+ within the OTG service area. OTG is starting service in two (2) of these high concentration zip codes (92102 and 92114) in April 2022, so this provides an opportunity to conduct outreach specifically geared toward Spanish speakers. Details may be found below in Table 2:

Table 2

Zip Codes with a High Concentration* of Spanish Speakers within OTG Service Area

Zip Code	Number of Spanish Speakers (age 65+)	Number of LEP Spanish Speakers (age 65+)
92025	1,173	818
92102	1,812	1,246
92105	1,542	854
92114	1,794	841
Totals	6,321	3,759

***Number of Spanish Speakers More than 20,000**

Total Spanish Population of OTG Service Area: 279,475

Total Spanish LEP 65+ Population of OTG Service Area: 11,795

Source: Table B16004, 2015-19 ASC 5-Year Estimates Detailed Tables

JFSSD *On the Go* utilizes various verbal and written strategies to effectively communicate with Spanish-speaking individuals. Bilingual staff and phone interpretation services are available for individuals. Vital documents are translated, including the enrollment information and the “welcome packet” provided to riders after enrollment. Marketing materials are created in English and Spanish. This variety of communication tactics helps individuals learn about the program, enroll, reserve rides, and quickly get answers to any program questions or concerns. Please see Appendix A for the in-depth analysis.

6aii Factor 2: The frequency with which LEP individuals come in contact with the program, activity, or service.

On the Go currently provides transportation to adults over the age of 60 in 45 zip codes within San Diego County. The majority (91%) of *On the Go* clients speak English. During daily operations, *On the Go* encounters the need for translation services sporadically. According to a recent survey of *On the Go* staff, the program receives ride requests from LEP clients approximately once per month, the majority of which are from Spanish speakers. In these instances, JFSSD uses a variety of methods to ensure effective communication, including working directly with the client’s English-speaking caregiver, utilizing bilingual staff, or contacting a phone interpretation service.

Demographic data, including primary language, are collected for JFS/OTG clients:

JFS Clients 60+, Primary Language	% of clients
English	79%
Spanish	6%
Russian	3%
Chinese	2%
All others combined (range .01% - 1.2%)	10%

OTG Clients 60+, Primary Language	% of clients
English	91%
Russian	3%
Spanish	1.5%
Farsi	1.5%
All others combined (range .05% - 0.36%)	3%

JFSSD has a variety of social service programs. An analysis of all JFSSD clients found that English is the most common primary language at 79%, Spanish was the second most common at 6%, and Russian was the third most common at 3%. Among *On the Go* clients only, English is the most common primary language at 91%, Russian is the second most common at 3%, and Spanish and Farsi are tied at 1.5%.

The analysis highlighted the potential need for increased outreach focused on Spanish speaking individuals. The analysis also highlighted the success of collaboration across JFSSD to serve Russian-speaking individuals. *On the Go* staff collaborate with a specialized JFSSD program that serves a high number of elderly Russian individuals. Approximately 63 *On the Go* riders speak Russian, representing approximately 3.0% of *On the Go's* clientele. During these specific programming events (which have historically occurred 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 but could be translated by JFSSD staff as needed.

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

The Aging Division of Jewish Family Service of San Diego includes Nutrition, Aging Care, Transportation, and Fix-It (minor home safety modifications) 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 JFSSD's Aging & Wellness programs, older adults have increased access to services and management of basic needs through a single point of entry. The programs inter-refer clients to appropriate program services as needs are assessed.

As a part of the Aging Division, *On the Go*: Transportation Solutions for Older Adults specifically addresses access to services and community involvement by 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. A recent community meeting by Age Well San Diego identified that older adults expressed concern about accessing services without the ability to drive. Individuals reported that public transit was not within walking distance or was too expensive. Other adults expressed mobility challenges with using public transit.

For older adults, transportation plays a crucial role in maintaining independence. An analysis of *On the Go* riders' reasons for needing transportation during fiscal year 2020-2021 shows the majority of riders (79%) utilized *On the Go* for transportation to medical appointments. The chart below shows a breakdown of ride reasons:

Reason for Transportation	Percent of Rides in 2020-2021
Medical	79.0%
Grocery/ Shopping	8.0%
Personal Care (Hair salon, gym, etc)	5.0%
Recreation (classes, library)	3.0%
Visiting Friends/ Loved Ones	2.5%
Spiritual	1.3%
Other	1.2%

On the Go rider surveys conducted in 2021 showed the value of providing reliable, safe transportation. 98.58% of respondents reported that the *On the Go* program helped to maximize their independence. 94.70% reported that the program helped increase their sense of community connectedness. The survey also highlighted how access to transportation impacts older adult health. 88.96% of respondents reported that the *On the Go* program helped clients maintain better health.

6aiv Factor 4: The resources available to the recipient and costs.

On the Go is a tightly budgeted program expenditures result in impacts to providing services to older adults. Grant funding, and therefore budgets, are often planned up to three years in advance. It is *On the Go*'s intention to provide interpretation services and create translated vital documents in compliance with Title VI requirements while also following a tight program budget.

Currently, *On the Go* utilizes various language translation methods. JFSSD's *On the Go* department employs two bilingual Spanish-speaking staff members. Staff help LEP clients reserve rides, answer program questions and help translate documents. As a program of JFSSD, *On the Go* also relies on JFSSD staff in other programs for translation and interpretation of approximately 35 different languages. JFSSD

also has existing contracts with various language translation and interpretation services. JFSSD uses LanguageLink for phone interpretation in over 300 languages. This service is used by *On the Go* if staff who speak the client's language are not available. JFSSD has also used companies for written translation of documents. If staff are not able to translate, *On the Go* explores using these contracted entities.

JFSSD uses cost-effective practices to provide outreach. The JFSSD *On the Go* webpage includes both a program flyer and a digital help request form in Spanish. The JFSSD marketing team works with English and Spanish-speaking media to promote transportation information, including rides to obtain vaccines during the COVID-19 pandemic. The media coverage provides free marketing. Furthermore, word of mouth across the agency provides high-impact ways to reach people.

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. The Factor 1 analysis found that 5.5% of the OTG service population are LEP Spanish speakers. 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 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:

1. Rider Enrollment Packet
2. Rider Liability Waiver
3. Rider Agreement
4. Title VI Plan Notice to the Public
5. Title VI Complaint Procedures
6. 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 who speak and/or write approximately 35 different languages to serve clients with a range of language 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
- Albanian – Spoken & Read
- American Sign Language – Spoken
- Amharic – Spoken
- Arabic – Spoken & Read
- Azerbaijani – Spoken & Read
- Bisaya (Filipino Dialect) – Spoken & Read
- Bulgarian – Spoken & Read
- Chinese – Spoken & Read
- Farsi/Persian/Dari – Spoken & Read
- French – Spoken & Read
- German – Spoken & Read
- Greek – Spoken & Read
- Guarani – Spoken
- Hebrew – Spoken & Read
- Hindi – Spoken
- Italian – Spoken & Read
- Japanese – Spoken & Read
- Kikuyu – Spoken & Read
- Kiswahili – Spoken & Read
- Lebanese – Spoken
- Macedonian – Spoken
- Pashto – Spoken & Read

- Portuguese – Spoken & Read
- Punjabi – Spoken & Read
- Russian – Spoken & Read
- Serbo-Croatian – Spoken & Read
- Somali – Spoken & Read
- Swiss German – Spoken & Read
- Tagalog – Spoken & Read
- Twi – Spoken & Read
- Ukrainian – Spoken & Read
- Urdu – Spoken & Read
- Xhosa – Read
- Yiddish – 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 administers multiple programs. The chart below details some of the LEP public outreach components the *On the Go* program currently has in place.

Program, Activity, Service	LEP Component
Outreach and Public Appearances	<ol style="list-style-type: none"> 1. Bilingual English/Spanish staff attend and represent the program 2. Flyers in Spanish provide information about the program and invite eligible community members (60+ years) to call in and learn more.
Quarterly & Annual Quality / Satisfaction Surveys	Quarterly surveys by mail provided in both English and Spanish.
Intake / Enrollment/ General <i>On the Go</i>	<ol style="list-style-type: none"> 1. Enrollment forms provided in both English and Spanish. 2. Assistance in completing forms available from bilingual English/Spanish staff. 3. Bilingual English/Spanish reservationists on staff to provide assistance by phone and in person. 4. Internal translation review by native Spanish speakers. 5. Agency web site provides notice of the availability of translation of <i>On the Go</i> materials in English and Spanish. 6. Agency web site posts notice of Title VI rights, complaint procedures and complaint form in English and Spanish. 7. Phone interpretation in over 300 languages

Future Language Assistance Measures

- Continue to review Vital Documents Guidelines to determine if any additional documents need to be translated
- Establish a self-monitoring mechanism for project managers to document LEP participation at all community meetings through sign-in sheets
- Create community-specific guidelines and key partner contacts for project managers to use when working in neighborhoods with high concentrations of LEP residents
- Increase usage of Spanish language media announcements when possible
- Place multi-language information and notices in publications serving LEP populations to increase access to information in a native language
- Update Public Participation Plan if required as a result of Four Factor Analysis

- Create staff Language Assistance Guidelines for how to interact with and provide services to LEP populations
- Pursue further language assistance and translation, if needed, with community-based organizations (CBOs) 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 customer service representatives who speak multiple languages
- Presence at community events with LEP attendees
- Some web translations
- Providing notice of the availability of translation services in marketing materials

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:

- Senior Director of Aging will act as the LEP Coordinator and monitor Plan to ensure compliance and correct implementation
- Staff will seek feedback from LEP communities regarding the effectiveness and usefulness of the LAP when possible
- Staff will seek 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 LEP Coordinator to ensure consistency

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 individuals
- Nature and importance of activities to LEP persons
- Availability of resources, including technological advances, 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

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 diverse needs in San Diego County.

Jewish Family Service customer service and reception staff are trained on how to address LEP populations.

As part of staff training, *On the Go* staff review the Language Assistance Plan and how to work with LEP individuals. This will include the following elements:

1. Review of JFSSD Title VI Document as part of onboarding process and after JFSSD board approval
2. A summary of *On the Go's* responsibilities under the U.S. DOT LEP Guidance
3. A summary of *On the Go's* Language Assistance Plan
4. A summary of *On the Go's* Four Factor Analysis
5. A description of the type of language assistance *On the Go* currently provides and instructions on how staff can access these products and services
6. How to respond to calls from LEP persons
7. How to respond to correspondence from LEP persons
8. How to respond to LEP persons in person
9. How to document the needs of LEP persons
10. How to respond to Civil Rights Act Title VI complaints
11. How to track Civil Rights Act Title VI complaints

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

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

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.

9 Board Resolution



BOARD RESOLUTION

AUTHORIZING THE TITLE VI COMPLAINT PLAN FOR JEWISH FAMILY SERVICE

WHEREAS, pursuant to Title VI of the Civil Rights Act of 1964, 42 U.S.C. §2000d et seq (the Act) and 49 CFR Part 21, the U.S. Department of Transportation and the Federal Transit Administration (FTA) prohibit discrimination on the basis of race, color or national origin; and

WHEREAS, as a subrecipient of federal funds, Jewish Family Service is required to comply with the requirements of the Act and applicable implementing regulations; and


WHEREAS, pursuant to FTA Circular 4702.1B, Jewish Family Service is required to submit its Title VI program to its governing entity for approval; and

WHEREAS, the Board of Directors for Jewish Family Service has considered and determined to approve the organization's 2022 Title VI program and policies as set forth in the attached Exhibit A entitled "Title VI Program," including but not limited to carry out a Limited English Proficiency Four Factor Analysis and adopt a Language Assistance Plan.

NOW, THEREFORE, BE IT RESOLVED:

That the Board of Directors hereby approves the organization's 2022 Title VI program and policies as set forth in the attached Exhibit A entitled "Title VI Program".

Dated: 3-15-22


Secretary of the Board
Jenny Meiselman, PhD

Appendix A

Analysis Detail

Identifying LEP Individuals Who Need Language Assistance

LEP POPULATION SOURCES

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

1. Spanish is the second most predominant language, after English, spoken in the OTG service area.
2. More than 12% of the OTG service area population speaks English less than “very well” (includes those that speak English “well”, “not well” and “not at all”).
3. More than 15% (15.88%) of people age 65+ in the OTG service area speak English less than “very well.” (includes those that speak English “well”, “not well” and “not at all”).
4. Spanish speaking LEP individuals age 65+ comprise over 44% of the OTG Service Area LEP population

JFSSD/*On the Go* evaluated the following federal, state, and local data sources to assist with the analysis of the LEP population:

- U.S. Census, 2015-2019 American Community Survey (ACS) 5-Year Public Use Micro Sample (PUMS).
- California Department of Education (CDE) English Learner Data, 2020-2021.
- County of San Diego Department of Behavioral Health Interpretation Services, Interpreter Services Report, Fiscal Year 2017-2018. Please note: Due to a change in the county’s methodology, interpretation services data in the current report have been updated, and therefore, are not comparable to data in previous LAP reports.

Table 3

English Proficiency of the 65+ Population in the *On the Go* Service Area

Service Area	Total Population Age 65 and Over	Speaks English Only	Speaks English		Percentage LEP
			“Very Well”	“Well”, “Not Well” or “Not at All”	
<i>On the Go</i>	247,156	181,166	26,728	39,262	15.88%

Source: U.S. Census Bureau, 2015-19 ACS 5-Year Estimates, B16004

An analysis was conducted using census data from 2015-2019 to understand the number and percentage of LEP individuals in the *On the Go* service area and their level of English proficiency. Individuals who speak English “well,” “not well,” or “not at all” (as opposed to “very well”) are considered to have limited English proficiency. Table 3 above highlights that 15.88 % of individuals aged 65+ living in the *On the Go* service area have limited English proficiency.

Table 4
LEP Persons Age 65+ in OTG Service Area by Primary Language

	# of Speakers in OTG Service Area	% of Service Area Population	# of Speakers in OTG Service Area	% of Service Area Population	# of Speakers in OTG Service Area	% of Service Area Population	# of Speakers in OTG Service Area	% of Service Area Population
	Spanish		Indo-European languages		Asian and Pacific Island languages		Other Languages	
English Proficiency								
Speaks English “Very Well”	10,226	4.14%	6,415	2.60%	8,982	3.63%	1,105	0.45%
Limited English Proficiency								
Speaks English “Well”	3,704	1.50%	3,269	1.32%	7,456	3.02%	1,213	0.49%
Speaks English “not well”	4,490	1.82%	1,868	0.76%	7,197	2.91%	1,248	0.50%
Speaks English “not at all”	3,601	1.46%	1125	0.46%	3,164	1.28%	927	0.38%
LEP Subtotal	11,795	4.78%	6,262	2.54%	17,817	7.21%	3,388	1.37%
Total	22,021	8.92%	12,677	5.14%	26,799	10.84%	4,493	1.82%

Source: Table B16004, 2015-2019 ACS 5-Year Estimates

A further analysis of the *On the Go* service area using census data provided a breakdown of English proficiency for individuals age 65+ who speak Spanish, Indo-European languages, Asian and Pacific Islander languages, and other languages. This information is presented in Table 4 above. The analysis found that individuals who speak Asian and Pacific Islander languages make up the highest percentage of LEP persons age 65+ in the *On the Go* Service area at 7.21%. Spanish speakers are the second most prevalent among this population at 4.78%. Third was 65+ individuals who spoke Indo-European Languages at 2.54% and lately other languages at 1.37%.

This analysis highlights the importance of having translation and interpretation services for *On the Go*, which serves a population with a high rate of limited English proficiency. JFSSD utilizes staff and third-party interpretation and translation services to assist with effective communication.

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 and ACS. In particular, the CDE data was used to determine the existence of other prevalent languages that may have fallen under the vaguer Census categories such as “Other and Unspecified Languages.”

Table 5 shows the top 12 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	67,620	80.30%
Arabic	2,668	3.17%
Chaldean	1,718	2.05%
Filipino (Pilipino or Tagalog)	1,702	2.02%
Vietnamese	1,562	1.85%
Other non-English languages	1,539	1.83%
Farsi (Persian)	905	1.07%
Mandarin (Putonghua)	851	1.01%
Somali	796	0.95%
Korean	574	0.96%
Russian	537	0.64%
Japanese	510	0.61%

Source: California Department of Education (CDE) English Learner data for San Diego County, 2020-2021

The data shows the majority of English learners are native Spanish speakers (80.30%). This constitutes a slightly larger share of Spanish-speaking English learners than previously identified in the 2017 CDE analysis (79.43%).

The analysis of the CDE English learner data roughly correlates to the analysis of Census LEP speakers in the OTG service area (by languages spoken) shown in Table 1. The CDE data, unlike the ACS data, shows that the Chaldean and Somali languages are included in the top ten list of languages for schoolchildren.

Table 6
Languages Spoken at Home in San Diego County

Language	Language Spoken at Home for the Population 5 and Older	Percent of Total Population
English Only	1,984,789	63.20%
Spanish	744,787	23.7%
All Other Languages	189,953	6.10%
Tagalog (incl. Filipino)	93,280	2.97%
Chinese (incl. Mandarin, Cantonese)	51,997	1.66%
Vietnamese	41,220	1.31%
Arabic	29,178	0.93%

Source: 2015-2019 ACS 5-Year Estimates, Table B16001

An analysis of 5 years of census data, displayed in Table 6 above, shows the breakdown of languages spoken at home in San Diego county. 63.20% of the population speaks English at home, making it the most common language spoken at home. Spanish is the second most common language spoken at home at 23.7%. Those who speak other languages at home comprise 6.10% of the population. People who speak Tagalog, Chinese, Vietnamese and Arabic each comprise less than 3% of the total population respectively.

Table 7
Languages Spoken by LEP Persons in OTG Service Area

Language	Estimated Total Speakers Who Speak English "Less than well" - 2016	Percentage of Service Area Population - 2016	Estimated Total Speakers Who Speak English "Less than well" - 2019	Percentage of Service Area Population - 2019	Percentage Increase/Decrease of Population
Arabic	10,000	0.61%	11,865	0.70%	18.65%
Russian/Polish/Slavic	4,619	0.28%	5,031	0.30%	8.92%
Chinese	17,734	1.07%	19,025	1.13%	7.28%
Other Indo-European	12,733	0.77%	13,338	0.79%	4.75%
Vietnamese	20,815	1.26%	21,403	1.27%	2.82%
Korean	5,043	0.31%	5,107	0.30%	1.27%
Spanish	95,020	5.75%	92,764	5.50%	-2.37%
German/Other West Germanic	1,143	0.07%	1,025	0.06%	-10.32%
Other Asian/Pacific Island	13,043	0.79%	11,334	0.67%	-13.10%
Tagalog	18,775	1.14%	15,973	0.95%	-14.92%
Other/Unspecified	9,548	0.58%	7,774	0.46%	-18.58%
French/Haitian/Cajun	1,197	0.07%	949	0.06%	-20.72%

Source: Table B16004, 2016 and 2019

An additional analysis shown in Table 7 above was completed comparing LEP population numbers from 2016 and 2019 within the *On the Go* service area. This helped to understand the population trends. The analysis shows that Arabic and Russian/ Polish/ Slavic speakers population rose the most, but the population size is less than 1% of the population. The population of individuals that speak Chinese also grew and comprises more than 1% of the total population. Additionally, individuals that speak Vietnamese and Korean grew, but the population is less than 1% of the overall population.

The population of individuals that speak Spanish decreased by 2%, but the population is more than 5% of the total population. Decreasing populations does not mean that translation services are not needed but does indicate that JFSSD should continue to track this change in population to see about other languages that may require further translation services in the future.

Appendix B



On the Go

Transportation Solutions for Older Adults

Stay connected with your loved ones and favorite places.

When you make the difficult decision to hand over your car keys, our team of volunteers are here to drive you where you need to go — whether it's to the doctor, the grocery store, or out to lunch with friends. More than transportation, *On the Go* promotes the connection, independence, and mobility that defines aging well.

Flexible options for adults ages 60+

Rides & Smiles

Individual transportation for personal or medical appointments, social activities, errands or any destination within 25 miles of your home. Trips must be scheduled at least one week in advance.

Navigator

On-demand transportation anywhere in San Diego County using services like Lyft. We monitor the journey in real time, ensuring that everything runs smoothly from the moment you are picked up to your destination. Trips must be scheduled at least one hour in advance.

On the Go Silver

A premium service that offers door-to-door transportation services for individual passengers and can be customized to include large groups. It offers special features including programming freedom, personalized assistance, and accessibility, including wheelchair transport.

Private Charter Transportation Services and Group Transportation

Group transportation services to social and wellness centers of JFS, shopping excursions, cultural events, and personalized destinations.

On the Go®

Transportation Solutions for Older Adults

Book your ride now!

(858) 637-3210 | www.jfssd.org/onthego



On the Go is a program of Charitable Adult Rides and Services (CARS) and is operated by Jewish Family Service





Programa "On the Go"

Soluciones de Transporte Para Adultos Mayores

Manténgase conectado con sus seres queridos y los lugares preferidos.

Cuando tome la difícil decisión de entregar sus llaves del coche, nuestro equipo de voluntarios está para conducir y llevarlo a donde necesite ir — ya al médico, al mercado, o a almorzar con amigos. Mas que transportación, el programa "On the Go" trata de promover la sensación de conexión, independencia, y movilidad que define el envejecer bien.

Opciones flexibles para adultos de edades 60+

Navegador

Transporte bajo demanda en cualquier parte del condado de San Diego usando servicios como Lyft. Monitoreamos el viaje en tiempo real, asegurando que todo salga bien desde el momento en que lo recogen hasta su destino. Podemos programar con una hora de anticipación mínimo.

On the Go Servicio Plata

Un servicio premium que ofrece servicios de transporte de puerta a puerta para pasajeros individuales y puede ser personalizado para incluir grupos grandes. Ofrece características especiales incluyendo libertad de programación, asistencia personalizada y accesibilidad, incluyendo transporte para silla de ruedas.

Transporte & Sonrisas

Transporte individual para citas médicas personales, actividades sociales, diligencias o a donde guste ir dentro de 25 millas de su domicilio. Estos viajes deben ser programados con mínimo una semana de anticipación y máximo un mes.

Servicios de transporte privado (charter) y transportación de grupos.

Ofrece servicios de transportación a los centros sociales y de bienestar de JFS, así como a tiendas, eventos culturales y opciones personalizadas.

On the Go®

Transportation Solutions for Older Adults

¡Reserva su transporte ahora!
(858) 637-7320 | www.jfssd.org/onthego



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