



Title VI Complaint Procedure How to File a Complaint And Complaint Form

Tracking and Investigating Process

It is the policy of OUTREACH to employ its best efforts to ensure that all programs, services, activities and benefits are implemented without discrimination. OUTREACH follows complaint investigation and format procedures which are in keeping with Title VI requirements. The following is the OUTREACH procedure for tracking and investigating complaints alleging discrimination on the basis of race, color or national origin.

Any person who believes that he or she, individually or as a member of any specific class of persons, has been subjected to discrimination on the basis of race, color, or national origin may file a written complaint with OUTREACH, the Federal Transit Administration (FTA) or the Secretary of Transportation. Further, OUTREACH prohibits intimidation, coercion or engagement in other discriminatory conduct against anyone because he or she has filed a complaint to secure rights protected by Title VI.

A signed complaint must be filed within 180 days after the date of the alleged discrimination, unless the time for filing is extended by the Secretary of Transportation. OUTREACH encourages complaints to be initially filed with OUTREACH for resolution. However, in those cases where the complainant is dissatisfied with the resolution by OUTREACH, the same complaint may be submitted to the FTA or the Secretary of Transportation for investigation. Unless otherwise permitted, the final determination of all the Title VI complaints affecting programs administered by the FTA will be made by the Office of the Secretary, Department of Transportation (DOT).

Complainants may submit signed written complaints to OUTREACH and/or directly to the FTA offices identified below:

Mr. Marvin Custodio, Title VI Administrator

OUTREACH Administration

2221 Oakland Road

San Jose, California 95131

Phone: 408-678-8585

Email: marvinc@outreach2.org

Caltrans Headquarters

California Department of

Transportation

Civil Rights, Equal Employment

Opportunity Program

Sacramento, Ca. 95811

Phone: 1-916-324-0988

Fax: 1-916-324-8430

Federal Transit Administration

Office of Civil Rights

Title VI Program

1200 New Jersey Avenue, SE

Washington, DC 20590

Phone: 1-888-446-4511

Federal Highway Administration

Washington DC Office

Civil Rights Program/Title VI

1200 New Jersey Ave., SE

8th Floor E81-105

Washington DC

Phone: 1-202-336-0693

Fax: 1-202-366-1599

In cases where the complainant is unable or incapable of providing a written statement but wishes OUTREACH or the FTA to investigate alleged discrimination, a verbal complaint of discrimination may be made. The complainant will be interviewed by an appropriate official authorized to

receive complaints. If necessary, the official will assist the complainant in converting the verbal complaint to writing. Translation services will be provided to all complainants, as necessary. All complaints must, however, be signed by the complainant or his/her representative.

Information for filing a Title VI complaint can be accessed on the OUTREACH website at www.outreach3.org or by contacting:

OUTREACH Administration - Mr. Marvin Custodio at 408-678-8585

E-mail inquiries or initial complaints can be sent directly to OUTREACH Administration at marvinc@outreach2.org.

English, Spanish, Vietnamese and Chinese language Title VI protection notification information is available in printed form at OUTREACH business office location (posted in multiple locations open to the public). Multi-lingual translation services are available by calling: 408-678-8585.

Complaint Format

1. All complaints must be in writing and signed by the complainant or his/her representative before action can be taken. Complaints shall state, as fully as possible, the facts and circumstances surrounding the alleged discrimination.
2. OUTREACH will provide the complainant or his/her representative with a written acknowledgement that OUTREACH has received the complaint within ten working days.
3. The following complaint information will be tracked by the Office of Civil Rights on the OUTREACH Title VI Complaint/Investigation log:
 - a. Date the complaint was received by OUTREACH
 - b. Date an acknowledgement letter was sent to the complainant
 - c. Entity
 - d. Protected category
 - e. Program/Activity/Service
 - f. Summary of the allegation
 - g. Status of the complaint
 - h. Was the complaint investigated? Yes or No.
 - i. Action taken
 - j. The response letter was sent to the complainant Action taken

Determination of Investigative Merit

OUTREACH will begin an investigation within fifteen (15) working days of receipt of a valid complaint. A complaint shall be regarded as meriting investigation unless:

1. It clearly appears on its face to be frivolous or trivial.
2. When the time allotted for making the determination of jurisdiction and investigative merit, the party complained against voluntarily concedes noncompliance and agrees to take appropriate remedial action.
3. Within the time allotted for making the determination of jurisdiction and investigative merit, the complainant withdraws the complaint; or
4. Other good cause for not investigation the complaint exists (e.g. respondent is presently under investigation by another Federal

agency.)

Request for Additional Information from Complainant and/or Respondent

In the event that the complainant or respondent has not submitted sufficient information to make a determination of jurisdiction or investigative merit, OUTREACH may request additional information from either party. This request shall be made within 15 working days of the receipt of the complaint and will require that the party submit the information within 60 working days from the date of the original request. Failure of the complainant to submit additional information within the designated time may be considered good cause for a determination of no investigative merit. Failure of respondent to submit additional information within the designated time frame may be considered good cause for a determination of noncompliance.

Investigative Report

OUTREACH will complete an investigation within ninety (90) days of receipt of the complaint. If additional time for the investigation is needed, the complainant will be contacted. A written report will be prepared by the responsible investigator at the conclusion of the investigation. The investigative report will include the following:

1. Summary of the complaint, including a statement of the issues raised by the complainant and the respondent's reply to each of the allegations, citations of relevant Federal, State, and Local laws, rules, regulations and guidelines, etc.
2. Description of the investigation, including a list of the persons contracted by the investigator and a summary of the interviews conducted; and a statement of the investigator's findings and recommendations. A closing letter will be provided to the complainant.



**Outreach & Escort, Inc. (OUTREACH)
TITLE VI COMPLAINT FORM**

Mr. Marvin Custodio, Title VI Administrator

OUTREACH Administration

2221 Oakland Road

San Jose, California 95131

Phone: 408-678-8585

Email: marvinc@outreach2.org

Section I

Name: _____

Address: _____

Telephone Numbers:

(Home or Cell) _____ (Work) _____

Email Address _____

Accessible Format Requirements?

Large Print: _____ Audio tape: _____

TDD: _____ Other: _____

The Federal Transit Administration (FTA) Office of Civil Rights is responsible for civil rights compliance and monitoring, which includes ensuring that providers of public transportation properly abide by Title VI of the Civil Rights Act of 1964, Executive Order 12898, "Federal Actions To Address Environmental Justice in Minority Populations and Low Income Populations," and the Department of Transportation's Guidance to



Recipients on Special Language Services to limited English Proficient (LEP) Beneficiaries.

In the FTA compliant investigation process, we analyze the complainant's allegations for possible Title VI and related deficiencies by the transit provider. If deficiencies are identified, they are presented to the transit provider and assistance is offered to correct the inadequacies within a predetermined timeframe. FTA may also refer the matter to the U.S. Department of Justice for enforcement.

Section II

Are you filing this complaint on your own behalf?

Yes _____ No _____

(If you answered "yes" to this question, go to Section III.)

If not, please supply the name and relationship of the person for whom you are complaining:

Please explain why you have filed for a third party:



Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.

Yes _____ No _____

Section III

Have you previously filed a Title VI complaint with FTA?

Yes _____ No _____

If yes, what was your FTA Complaint Number? _____

(Note: This information is needed for administrative purposes; the same complaint number may be assigned to the new complaint.)

Have you filed this complaint with any of the following agencies?

Transit Provider: _____ Department of Transportation: _____

Department of Justice: _____ Other: _____

Equal Employment Opportunity Commission: _____

Have you filed a lawsuit regarding this complaint?

Yes _____ No _____

If yes, please provide a copy of the complaint form.

(Note: This above information is helpful for administrative tracking purposes. However, if litigation is pending regarding the same issues, parties defer to the decision of the court.)



Section IV

Name of public transit or paratransit provider complaint is against:

Contact person: _____ Title: _____

Telephone Number: _____

On separate sheets, please describe your complaint. You should include specific details such as names, dates, times, route numbers, witnesses, and any other information that would assist us in our investigation of your allegations. Please also provide any other documentation that is relevant to this complaint.

Section V

May we release a copy of your complaint to the transit/paratransit provider?

Yes _____ No _____

May we release a copy of your identity to the transit/paratransit provider?

Yes _____ No _____

Please sign here: _____ Date: _____

(Note: A signature is required for complaint acceptance.)



COMPLAINT FORM

Mr. Marvin Custodio, Title VI Administrator

OUTREACH Administration

2221 Oakland Road

San Jose, California 95131

Phone: 408-678-8585

Email: marvinc@outreach2.org

California Department of
Transportation
Civil Rights, Equal Employment
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Sacramento, Ca. 95811
Phone: 1-916-324-0988
Fax: 1-916-324-8430

Federal Transit Administration
Office of Civil Rights
Attention: Complaint Team
1200 New Jersey Ave., SE
Washington, DC 20590
Phone: 1-888-446-4511

Federal Highway Administration
Washington DC Office
Civil Rights Program/Title VI
1200 New Jersey Ave., SE
8th Floor E81-105
Washington DC
Phone: 1-202-336-0693
Fax: 1-202-366-1599



Notification of Title VI Protection

Protecting Your Rights: What is Title VI?

Title VI of the Civil Rights Act of 1964 is a Federal statute that ensures that no person shall be discriminated against or denied benefits on the ground of race, color, or national origin, in programs and services that receive federal financial assistance. As such, to ensure that OUTREACH customers are not discriminated against, we have adopted policies that promote equal access and quality service to all our customers.

How Do I File a Title VI Complaint?

If you believe you have been discriminated against, you may file a signed, written complaint within one hundred and eighty (180) days of the date of alleged discrimination. The complaint should include the following information:

1. Your name, address and how to contact you (e.g. telephone number, e-mail address, etc.), and
2. How, when, where and why you believe you were discriminated against. Include the location, names and contact information of any witnesses.

The complaint may be filed in writing to OUTREACH directly at:

Marvin Custodio, Title VI Administrator
OUTREACH Administration
2221 Oakland Road
San Jose, California 95131

Phone: 408-678-8585
Email: marvinc@outreach2.org



Printable Title VI Form Title VI Complaint Procedure

E-mail: marvinc@outreach2.org

Telephone: 408-678-8585

Hearing & Speaking Impaired: Dial 711 to Reach California Relay Service

Complaint Assistance

An OUTREACH Customer Service representative will assist with writing a complaint if the complainant is unable to do so. We will accommodate any language requirement and will provide accessible formats and accommodations.

Complainants may also file a Title VI complaint with an external entity such as FTA, other federal and state agencies or federal or state court. However, should a complainant be filed with OUTREACH and an external entity simultaneously, the external complaint will supersede the OUTREACH complaint and OUTREACH complaint procedures will be suspended pending the external entity's findings.

Thank you. *Dennis Wootten* Outreach CEO
Dennis Wootten

Outreach & Escort, Inc. (OUTREACH)
2221 Oakland Road
San Jose, California 95131
408-678-8585
marvinc@outreach2.org

Location of this Notification: This notification is posted in public area of building/lobby of business location open to the public; this notification is posted on agency website; this notification is routinely included in informational materials to public/riders for services.



Outreach & Escort, Inc. (OUTREACH)

Limited English Proficiency (LEP) Plan

And ADA Accommodation

**Approved by Outreach & Escort Board of Directors _____ 2022
For FY22–FY24**

I. Introduction

This *Limited English Proficiency Plan* has been prepared to address OUTREACH's responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq, and the implementing regulations, which state that no person shall be subjected to discrimination on the basis of race, color or national origin.

Executive Order 13166 - "Improving Access to Services for Persons with Limited English Proficiency", requires that recipients of Federal financial assistance provide meaningful access to LEP applicants and beneficiaries. The Executive Order establishes that differing treatment based upon a person's inability to speak, read, write or understand English is a type of national origin discrimination. It directs each federal agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discrimination does not take place. This order applies to all State and local agencies that receive federal funds.

II. Plan Summary

OUTREACH has developed this *Limited English Proficiency Plan* to help identify reasonable steps for providing language assistance to persons with limited English proficiency (LEP) who wish to access services provided by OUTREACH. As defined in Executive Order 13166, LEP persons are: Those who do not speak English as their primary language; and have a limited ability to read, write, speak or understand-English, as a result of national origin.

This plan outlines how to identify a person who may need language assistance, the way in which assistance may be provided, staff training that may be required, and how to notify LEP persons that assistance is available.

In order to prepare this plan, OUTREACH undertook the U.S. DOT four-factor LEP analysis which considers the following factors:

1. The number or proportion of LEP persons in the service area who may be served or are likely to encounter an OUTREACH program, activity or service,
2. The frequency with which LEP persons come in contact with OUTREACH programs, activities or services,

3. The nature and importance of programs, activities or services provided by OUTREACH to LEP individuals, and
4. The resources available to OUTREACH and overall cost to provide LEP assistance.

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

III. Four-Factor Analysis

1. *The number or proportion of LEP persons in the service area who may be served or are likely to encounter an OUTREACH program, activity or service.*

The Census Bureau has a range of four classifications of how well people speak English. The classifications are “very well,” “well,” “not well,” and “not at all” as Limited English Proficient persons.

Table 1: LANGUAGE SPOKEN AT HOME FOR THE POPULATION 5 YEARS AND OVER. Language Spoken at Home by Ability to Speak English, Persons Age 5 years and Over, 2016-2020, San Francisco Bay Area, American Community Survey 2016-2020
Data for Santa Clara County

Speaks English Less than “Very Well”	2012-2016 Number	2012-2016 Percentage	2020 Number	2020 Percentage
Spanish	131,546	7.5%	118,954	6.57%
Korean	2,968	0.7%	10,719	0.59%
Chinese	15,265	3.6%	78,198	4.32%
Vietnamese	17,386	4.1%	75,218	4.15%
Tagalog	4,664	1.1%	19,062	1.05%
Other Languages	219,186	12.4%	302,151	14.7%
Total Speaking English Less than “Very Well”	391,015	22.2%	354,229	20%
Speaks English “Very Well”	1,373,357	77.8%	1,462,377	80%
TOTAL	1,764,372	100%	1,816,606	100%

Notes: Tabulation prepared by VTA staff based on data from the American Community Survey (ACS) 2016-2020.

Updated information from the 2016-2020 ACS survey is based on estimates but the ACS survey did specifically break out **the Spanish number and percentile and Spanish is the one language that exceeded the 5% threshold.**

A. The Total Population for Santa Clara County was 1,894,783, although this number may not be precise due to independent rounding. The source was the U.S. Census, State of California, Department of Finance, Demographic Research Unit. This was cited in the Santa Clara Valley Transportation Authority’s Annual Comprehensive Financial Report for the Fiscal year Ended June 30, 2022. (Page 3-18).

B. Other sources may vary such as the State of California Department of Finance with a 2020

population estimated at 1,996,394. Per the 2017 American Community Survey, 5-Year Estimates, 12% of the population in the county is 50-74 years of age, consistent with the state at 13% (Sourcewise page 29).

C. The 2019 data from the U.S. Census Bureau American Community Survey 5-Year Estimates, Table B01001; 2050 data from the MTC Plan Bay Area, reports older adults in SCC at 12% in 2019 and expected to go to 13% by 2035; same data sets reported 8% of the populations in SCC living with a disability in 2019 and for that to remain at that level by 2035 but for persons over 60 years of age that percentage was higher at 31% in 2019.

D. Per the California Department of Finance, the older adult population of 60 plus years is becoming more diverse in Santa Clara County (Area Plan on Aging, 2020-2024) between 2010 and 2020. (Marvin, pages 3 and 5 in Nelson Nygaard's "MTC Coordinated Plan TAC Third Meeting May 2, 2002, draft).).

E. Languages Spoken at Home (U.S. Census) 2021 provides additional data to the United Census Bureau, 2016-2020 American Community Survey. Table B16001: 5-year estimate based on 2015 data. As reflected in the table, the top five non-English Languages Spoken in Santa Clara County for persons over 5 years of age "who speak English less than well" are in descending order: 6.57% Spanish (118,954); 4.32% Chinese (Mandarin and Cantonese) (78,198; 4.15% Vietnamese (75,218); 1.09% Tagalog (19,062); and 0.59% Korean (10,719). (VTA Title VI page 97).

As a non-profit organization, special attention is focused on meeting the needs of older adults and persons with disabilities. Per the California Department of Finance, the older adult population of 60 plus became more diverse between 2010 and 2020 in SCC (Area Plan on Aging, 2020-2024) and Outreach will accommodate this cultural and language diversity. Per the 2019 data from the U.S. Census Bureau American Community Survey 5-Year Estimates, Table B01001; 2050 data from the MTC Plan Bay Area, older adults in SCC were reported at 12% in 2019 and expected to go to 13% by 2035; same data sets reported 8% of the populations in SCC living with a disability in 2019 and for that to remain at that level by 2035. ADA accommodations shall also be made.

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

OUTREACH assessed the frequency with which staff and drivers have, or could have, contact with LEP persons. The following “touch points” and frequencies have been identified:

PRIMARY TOUCH POINTS	FREQUENCY
Drivers	Frequently
OUTREACH Eligibility	Frequently
Rider’s Guide	Often- Frequently
Dispatchers/Schedulers	Often
Mobility Managers	Often
Website	Occasionally
Social Workers/Case Managers	Often

SECONDARY “TOUCH POINTS”	FREQUENCY
Office Staff	Occasionally
Road Supervisors	Rarely
Print Media	Occasionally

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

The largest geographic concentration of LEP individuals in the OUTREACH service area are speakers of Spanish followed by Asian languages. Community transportation and social services targeting low-income individuals, persons with disabilities, and older adults are most likely to encounter LEP individuals.

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

OUTREACH assessed available resources that could be used for providing LEP assistance, including determining: how much a professional interpreter and translation service would cost on an as-needed basis, how to access quality translation services or tools at no cost, which of documents would be the most valuable to be translated if the need should arise, and an inventory of available organizations that OUTREACH could partner with for OUTREACH’s translation efforts.

Safe Harbor Provision – The Federal Transit Administration Circular 4702.1B states: “The Safe Harbor Provision stipulates that, *if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with*

the recipient's written translation obligations. Translation of non-vital documents, if needed, can be provided orally. If there are fewer than 50 persons in a language group that reaches the five percent (5%) trigger, the recipient is not required to translate vital written materials but should provide written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost.

These safe harbor provisions apply to the translation of written documents only. They do not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable. A recipient may determine, based on the Four Factor Analysis, that even though a language group meets the threshold specified by the Safe Harbor Provision, written translation may not be an effective means to provide language assistance measures. For example, a recipient may determine that a large number of persons in that language group have low literacy skills in their native language and therefore require oral interpretation. In such cases, background documentation regarding determination shall be provided to FTA in the Title VI Program."

Based on the four-factor analysis, Spanish is the quantifiable population that are limited-English proficient. However, vital documents, including all Title VI related documents, are available not only in Spanish but also Chinese and Vietnamese.

IV. Limited English Proficiency (LEP) Plan Outline

There are five areas that comprise OUTREACH's LEP Plan:

1. Identifying LEP individuals who need language assistance
2. Language assistance measures
3. Training Staff
4. Providing Notice to LEP Plan
5. Monitoring and updating the LEP Plan

1. Identifying LEP individuals who need language assistance

How OUTREACH may identify an LEP person who needs language assistance

- Examine records for language assistance that had been received in the past, to determine what kinds of language assistance may be needed in the future.
- Examine applications that are currently in languages other than English (e.g. Spanish, and Vietnamese, etc.) to see demand and also track any requests for other language assistance to apply for agency programs and services.
- When OUTREACH sponsors an event, have a staff person greet participants as they arrive. By informally engaging participants in conversation determine if they will need language assistance to fully participate. Track such information for future events.
- Have Census Bureau *Language Identification Flashcards* available at OUTREACH events near the registration table of event, and at front desk of business office location. Individuals self-identify as persons not proficient in English may not be able to be accommodated with translation assistance at the event, but it will assist in identifying language assistance needs for future events.
- Have *Language Identifying Flashcards* on all vehicles to assist coach operators in identifying specific language assistance needs of passengers. If such individuals are encountered, vehicle operators will be instructed to record and report so OUTREACH staff can follow-up with the client.
- Mobility Management and other staff who interact with the public and clients or who deliver trips will also be instructed to maintain records of LEP individuals needing assistance in person or over the phone so that requests for language assistance can be tracked in the appropriate database.
- OUTREACH provides emergency specific *Language Identifying Assistance* flash cards in multiple languages to assist drivers to communicate with LEP riders during or after an emergency/disaster. Drivers will report back to dispatch any instances of

the use of these tools for purposes of recording and follow-up with the customer to determine any future assistance needed.

2. Language Assistance Measures

There were and will continue to be numerous language assistance measures available to LEP persons, including both oral and written language services. There are also various ways in which OUTREACH staff responded to LEP persons, whether in person, by telephone or in writing.

How OUTREACH assisted or will assist an LEP person who needs language assistance.

- OUTREACH continued and will continue to provide vital information to LEP groups on OUTREACH programs and services;
- Networked with human service organizations and internal agency programs that provide services to LEP individuals and sought opportunities to provide information on OUTREACH programs and services;
- Provided a bilingual Community OUTREACH Coordinator at community events, other public events, and meetings as needed;
- Placed statements in notices and publications that interpreter services are available for these meetings, with reasonable advance notice;
- Tracked information from front-line staff concerning any contacts with LEP persons during the previous year;
- Provided *Language Identification Flashcards* at the front desk, onboard OUTREACH vehicles and other locations as appropriate;
- Posted the OUTREACH Title VI Policy and LEP Plan on the agency website, www.outreach3.org;
- Provided group travel training to LEP persons with the assistance of bilingual staff;
- Included language “Spanish a plus” and “Bilingual a plus” on employee and volunteer recruitment materials;
- OUTREACH website has the capability for a person to select a language, click and have automatic translation services via Yahoo! Babelfish and google Translate;
- When an interpreter is needed for a language other than English in person or on the telephone, staff will attempt to access language assistance from a professional translation service or qualified community volunteers or social workers/case

managers.

- For the hearing impaired: Sign-language interpreters will be provided upon request. Video Relay Services (VRS) which is always and VRS is a form of the Telecommunications Relay Service (TRS) that enables persons with hearing disabilities to use American Sign Language (ASL) to communicate with voice telephone users through video equipment, rather than through typed text.

3. Staff Training

How OUTREACH trained staff and continues to train staff on its role and responsibilities in providing meaningful access to services for LEP persons

- Developed curriculum and corresponding PowerPoint presentations to educate OUTREACH staff on Title VI LEP requirements for providing meaningful access to services for LEP persons;
- Provided staff with a description of language assistance services offered by OUTREACH;
- Provided staff with specific procedures to be followed when encountering an LEP person, including how to handle a potential Title VI/LEP complaint;
- Instructed staff on the use of FTA *Language Identification Flashcards*;
- Instructed staff on the use of on-line translation tools via <http://translate.google.com> or <http://babelfish.yahoo.com/> with appropriate editing for accuracy by qualified persons, etc.

4. Providing Notice to LEP Persons

How OUTREACH provided and continues to provide Notice to LEP Persons, both oral and written communications;

- Offered general information, such as operation hours and services through phone system.
- Used greetings, both Spanish and English, directing callers to select which language they prefer;
- Continued to provide the Rider's Guide in English and Spanish and accessible formats

- Continued to translate vital documents and ensure they are accurate (vital documents are defined as those documents without which a person would be unable to access services)

The following are written communications printed in both English and Spanish:

- Riders Guide which contains information on fares, accessibility, and general riding information;
 - Applications for services; and
 - All Title VI and LEP materials
- Provided printed information in multiple languages about OUTREACH's non-discrimination policies and information on the local/federal complaint process, place them on the agency's website and have them available at public meetings;
 - Provided a tagline affirming OUTREACH will make reasonable accommodations to translate any materials into Spanish or provide an interpreter at public hearings and meetings;

5. **Monitoring and updating the LEP Plan**

This plan is designed to be flexible, and should be viewed as a work in progress. As such, it is important to consider whether new documents and services need to be made accessible for LEP persons, and also to monitor changes in demographics and types of services.

OUTREACH updates the LEP every three (3) years, as required by U.S. DOT.

How OUTREACH will examine and update its LEP Plan:

- Record and report how on the number of LEP persons were encountered annually through OUTREACH's compliance efforts; Determine if needs were reasonably met through OUTREACH's bilingual staff, language and translation assistance, etc.
- Determine how the needs of LEP persons have been addressed;
- Participate with external entities authorized to do transportation planning in the state, region and local level as they assess the needs and plan for current LEP population in the service area;
- Determine whether agency financial resources are sufficient to fund language assistance resources needed;

- Determine whether OUTREACH and its Contractor(s) have fully complied with the goals of this LEP Plan;
- Determine whether complaints have been received concerning the agency's failure to meet the needs of LEP individuals; and
- Obtain input from customers on a regular basis about their language needs.

IV. Dissemination of the OUTREACH LEP Plan

How the OUTREACH LEP Plan will be disseminated to customers and the community;

A link to the OUTREACH LEP Plan and the Title VI Plan will be included on the OUTREACH website: www.OUTREACH3.org

OUTREACH's LEP Plan will also be shared with human service organizations in its service area.

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

Questions or comments regarding the LEP Plan may be submitted to the OUTREACH Executive Director as follows:

Marvin Custodio, Title VI Administrator
2221 Oakland Rd. Suite #200
San Jose, CA 95131
(408) 678-8585

Appendix A: Title VI Program Limited English Proficiency (LEP) Reporting Form and ADA Accommodation Form

**Title VI Program Limited English Proficiency (LEP)
Reporting Form and ADA Accommodation Form**

Name: _____

Date: _____

Walk-In/Direct Contact: _____ Telephone: _____ In Writing: _____

In Public Setting: _____

How was the interpreter/translation services provided?

Staff: _____

Contractor Staff: _____

Volunteer: _____

Phone Interpreter Service: _____

Other: _____

Language: _____

ADA Accommodation Need: _____

ADA Format or Method: _____

Length of Time to Provide Service: _____



Outreach & Escort Inc. (OUTREACH)
Title VI Notice to the Public
POLÍTICA DE NO-DISCRIMINACIÓN DE OUTREACH

OUTREACH & Escort Inc. (OUTREACH), bajo el Título VI de la ley de derechos civiles de 1964 y estatutos relacionados, asegura que ninguna persona por motivos de raza, color o origen nacional sea excluida de participar, o sean negados beneficios o sea sujeta a discriminación en cualquier programa o actividad que se dirija.

Para más información u orientación sobre cómo presentar una queja por motivos en raza, color o origen nacional, visite la siguiente página web: <http://www.outreach3.org> o llame al teléfono (408) 678-8585.

Si usted necesita traducción y / o ayuda con otros materiales en inglés, y / o en otro formato, como por ejemplo material en método Braille, audio, impresión con letras en grande, póngase en contacto con Marvin Custodio, Administrador del Título VI, OUTREACH & Escort Inc., PO Box 640910, San Jose, California 95164. El teléfono es (408) 678-8585, o por correo electrónico: marvinc@outreach2.org

Dennis Wootten

Dennis Wootten, CEO

11/28/2022

Date

Aprobado por el Consejo Directivo de Outreach & Escort Inc. en 8/31/22.



Outreach & Escort, Inc. (OUTREACH)
TITLE VI COMPLAINT FORM

Mr. Marvin Custodio
OUTREACH Administration
2221 Oakland Road
San Jose, California 95131
Phone: 408-678-8585
Email: marvinc@outreach2.org

Sección I

Nombre: _____

Dirección: _____

Números de Teléfonos:

(Casa o Celular): _____ (Trabajo): _____

Correo Electrónico: _____

Requerimientos de formatos accesibles?

Letra Grande: ____ Cinta de Audio: ____

Discapacidad Auditiva/TDD: ____ Otro: ____

La Administración Federal de Tránsito (FTA) Oficina de Derechos Civiles es responsable del cumplimiento de los derechos civiles y

monitoreo, que incluye garantizar que los proveedores de transporte publico cumplan debidamente con el Título VI del Acta de Derechos Civiles de 1964, la Orden Ejecutiva 12898, "Acciones federlaes para abordar un ambiente de justicia en poblaciones minoritarias y de bajos ingresos", y el Departamento de Transporte de Orientación a los Destinatarios en servicios de idiomas a personas de Inglés limitado (LEP) Beneficiarios.

En el proceso de investigacion de quejas FTA, se analiza las alegaciones del demandante por el título VI possible deficiencias relacionadas con el proveedor de tránsito. Si se detectan deficiencias, se presentan al proveedor de tránsito y se ofrece ayuda para corregir las deficiencias en un plazo predeterminado. FTA también podrá remitir el asunto al Departamento de Justicia de EEUU para la ejecución.

Sección II

¿Está presentando esta queja por su propia cuenta?

Sí _____ No _____

(Si usted contestó "sí" a esta pregunta, ir a la seccion III.)

Si no es así, favor de proporcionar el nombre y relación de la perosona por quien usted se está quejando:

Por favor explique por qué usted ha presentado por un tercero:

Por favor, confirme que ha obtenido el permiso de la parte agraviada, si usted está presentando en nombre de un tercero.

Sí _____ No _____

Sección III

¿ Ha presentado anteriormente una queja del Título VI con FTA?

Sí _____ No _____

En caso afirmativo, ¿cuál fue su número de queja con FTA? _____
(Nota: Esta información es necesaria con fines administrativos; el mismo numero de queja puede ser asignado a la nueva queja.)

¿Ha presentado esta queja ante cualquiera de las siguientes agencias?

Transit Provider: _____ Departamento de Transporte: _____

Departamento de Justicia: _____ Otro: _____
Equal Employment Opportunity Commission: _____

¿Ha presentado una demanda con respect a esta queja?

Sí _____ No _____

En caso afirmativo, por favor proporcione una copia del formulario de queja.

(Nota: Esta información en útil con fines de seguimiento administrativo. Sin embargo, si el litigio en relacion con los mismos problemas esta pendiente, las partes aplazaran la decisión de la corte.)

Sección IV

Nombre de Tránsito public o proveedor de paratransito que esta en contra de:

Persona a contactar: _____ Título: _____

Numero de teléfono : _____

En hojas por separado, por favor describa su queja. Usted puede incluir detalles específicos, tales como nombres, fechas, horas, numeros de ruta, testigos y cualquier otra información que nos ayude en nuestra investigación de sus denuncias. Sirvase también proporcionar cualquier otra documentación que sea relevante para la presente queja.

Sección V

Podemos proporcionar una copia de su queja al proveedor de tránsito/paratránsito?

Sí _____ No _____

Podemos proporcionar una copia de su identidad al proveedor de tránsito/paratránsito?

Sí _____ No _____

Por favor firme aquí: _____ Fecha: _____

(Note: Se requiere una firma para la aceptación de la queja.)

FORMULARIO DE QUEJA

Mr. Marvin Custodio
OUTREACH Administration
2221 Oakland Road
San Jose, California 95131
Phone: 408-678-8585
Email: marvinc@outreach2.org

Caltrans Department of
Transportation
Civil Rights, Equal Employment
Opportunity Program
700 N. 10th Street, Suite
102B
Sacramento, California
95814
Phone: 916- 324-9461

Federal Transit Administration
Office of Civil Rights
Attention: Complaint Team
1200 New Jersey Ave., SE
Washington, DC 20590
Phone: 1-888-446-4511

Federal Highway
Administration
Washington DC
Office of
Civil Rights Program/Title VI
1200 New Jersey Ave., SE
8th floor E81-105
Washington DC 20590
Phone: 1-202-336-0693
Fax: 1-202-366-1599



TITLE VI PROGRAM

Updated November 2022

Board Approved 11/28/ 2022

**Outreach & Escort, Inc.
2221 Oakland Road
San Jose, California 95131
1-408-678-8585**

Index

1. Notice of Title VI Protections to the public including list of locations where notice is posted
2. Title VI Complaint Procedures, How to file a Complaint and Complaint Form
3. Title VI Tracking Form – List of any public transportation Title VI investigations, complaints or lawsuits filed since last submission (none to report)
4. Title VI Public Participation Plan – Promoting Inclusive Public Participation
5. Limited English Proficiency (LEP) Plan
6. Table depicting racial breakdown of transit-related, non-elected planning boards, advisory councils or committees (Outreach is a non-profit; racial breakdown provided)
7. No facility has been constructed so no Title VI equity analysis needed – Not applicable
8. Sub-recipient not a fixed route provider or public agency – Not applicable
9. Outreach Non-profit Board Approval Action for Title VI Program

1. Notification of Title VI Protections



Notification of Title VI Protection

Protecting Your Rights: What is Title VI?

Title VI of the Civil Rights Act of 1964 is a Federal statute that ensures that no person shall be discriminated against or denied benefits on the ground of race, color, or national origin, in programs and services that receive federal financial assistance. As such, to ensure that OUTREACH customers are not discriminated against, we have adopted policies that promote equal access and quality service to all our customers.

How Do I File a Title VI Complaint?

If you believe you have been discriminated against, you may file a signed, written complaint within one hundred and eighty (180) days of the date of alleged discrimination. The complaint should include the following information:

1. Your name, address and how to contact you (e.g. telephone number, e-mail address, etc.), and
2. How, when, where and why you believe you were discriminated against. Include the location, names and contact information of any witnesses.

The complaint may be filed in writing to OUTREACH directly at:

Marvin Custodio, Title VI Administrator
OUTREACH Administration
2221 Oakland Road
San Jose, California 95131

Phone: 408-678-8585
Email: marvinc@outreach2.org



Printable Title VI Form Title VI Complaint Procedure

E-mail: marvinc@outreach2.org

Telephone: 408-678-8585

Hearing & Speaking Impaired: Dial 711 to Reach California Relay Service

Complaint Assistance

An OUTREACH Customer Service representative will assist with writing a complaint if the complainant is unable to do so. We will accommodate any language requirement and will provide accessible formats and accommodations.

Complainants may also file a Title VI complaint with an external entity such as FTA, other federal and state agencies or federal or state court. However, should a complainant be filed with OUTREACH and an external entity simultaneously, the external complaint will supersede the OUTREACH complaint and OUTREACH complaint procedures will be suspended pending the external entity's findings.

Thank you.  Outreach CEO
Dennis Wooten

Outreach & Escort, Inc. (OUTREACH)
2221 Oakland Road
San Jose, California 95131
408-678-8585
marvinc@outreach2.org

Location of this Notification: This notification is posted in public area of building/lobby of business location open to the public; this notification is posted on agency website; this notification is routinely included in informational materials to public/riders for services.



List of Locations Where Title VI Notice Is Posted

Outreach & Escort, Inc. notice to the public is currently posted at the following locations:

Location Name	Address	City
Public Lobby	2221 Oakland Rd.	San Jose
Main Shared Office Space	2221 Oakland Rd.	San Jose
Agency Vehicle #160	2221 Oakland Rd.	San Jose
Agency Vehicle #170	2221 Oakland Rd.	San Jose

Title VI notice and program information is also provided on OUTREACH's website at <http://www.outreach3.org>.

You may wish to send a request for a copy of our public notification and Title VI program information by contacting marvinc@outreach2.org.



Outreach & Escort Inc. (OUTREACH)
Title VI Notice to the Public
POLÍTICA DE NO-DISCRIMINACIÓN DE OUTREACH

OUTREACH & Escort Inc. (OUTREACH), bajo el Título VI de la ley de derechos civiles de 1964 y estatutos relacionados, asegura que ninguna persona por motivos de raza, color o origen nacional sea excluida de participar, o sean negados beneficios o sea sujeta a discriminación en cualquier programa o actividad que se dirija.

Para más información u orientación sobre cómo presentar una queja por motivos en raza, color o origen nacional, visite la siguiente página web: <http://www.outreach3.org> o llame al teléfono (408) 678-8585.

Si usted necesita traducción y / o ayuda con otros materiales en inglés, y / o en otro formato, como por ejemplo material en método Braille, audio, impresión con letras en grande, póngase en contacto con Marvin Custodio, Administrador del Título VI, OUTREACH & Escort Inc., PO Box 640910, San Jose, California 95164. El teléfono es (408) 678-8585, o por correo electrónico: marvinc@outreach2.org

Dennis Wootten

Dennis Wootten, CEO

11/28/2022

Date

Aprobado por el Consejo Directivo de Outreach & Escort Inc. en 8/31/22.



If information is needed in Chinese, please
contact: (408)678-8585

如果需要中文本的信息，请致电：(408)678-8585

If information is needed in Spanish, please
contact: (408)678-8585

Si necesita información en español, por favor
de contactar: (408)678-8585

If information is needed in Vietnamese, please
contact: (408)678-8585

Nếu cần chi tiết bằng tiếng Việt, xin vui lòng liên
lạc: (408)678-8585



NOTIFICATIONS

Copies of these
notifications* may be
obtained from an Office
Staff

Or

By visiting OUTREACH's
website at

www.outreach3.org

*Alternate formats are
available upon request

2. Title VI Complaint Procedures, How to file a Complaint and Complaint Form.



**Title VI Complaint Procedure
How to File a Complaint
And Complaint Form**

Tracking and Investigating Process

It is the policy of OUTREACH to employ its best efforts to ensure that all programs, services, activities and benefits are implemented without discrimination. OUTREACH follows complaint investigation and format procedures which are in keeping with Title VI requirements. The following is the OUTREACH procedure for tracking and investigating complaints alleging discrimination on the basis of race, color or national origin.

Any person who believes that he or she, individually or as a member of any specific class of persons, has been subjected to discrimination on the basis of race, color, or national origin may file a written complaint with OUTREACH, the Federal Transit Administration (FTA) or the Secretary of Transportation. Further, OUTREACH prohibits intimidation, coercion or engagement in other discriminatory conduct against anyone because he or she has filed a complaint to secure rights protected by Title VI.

A signed complaint must be filed within 180 days after the date of the alleged discrimination, unless the time for filing is extended by the Secretary of Transportation. OUTREACH encourages complaints to be initially filed with OUTREACH for resolution. However, in those cases where the complainant is dissatisfied with the resolution by OUTREACH, the same complaint may be submitted to the FTA or the Secretary of Transportation for investigation. Unless otherwise permitted, the final determination of all the Title VI complaints affecting programs administered by the FTA will be made by the Office of the Secretary, Department of Transportation (DOT).

Complainants may submit signed written complaints to OUTREACH and/or directly to the FTA offices identified below:

Mr. Marvin Custodio, Title VI Administrator

OUTREACH Administration

2221 Oakland Road

San Jose, California 95131

Phone: 408-678-8585

Email: marvinc@outreach2.org

Caltrans Headquarters

California Department of

Transportation

Civil Rights, Equal Employment

Opportunity Program

Sacramento, Ca. 95811

Phone: 1-916-324-0988

Fax: 1-916-324-8430

Federal Transit Administration

Office of Civil Rights

Title VI Program

1200 New Jersey Avenue, SE

Washington, DC 20590

Phone: 1-888-446-4511

Federal Highway Administration

Washington DC Office

Civil Rights Program/Title VI

1200 New Jersey Ave., SE

8th Floor E81-105

Washington DC

Phone: 1-202-336-0693

Fax: 1-202-366-1599

In cases where the complainant is unable or incapable of providing a written statement but wishes OUTREACH or the FTA to investigate alleged discrimination, a verbal complaint of discrimination may be made. The complainant will be interviewed by an appropriate official authorized to

receive complaints. If necessary, the official will assist the complainant in converting the verbal complaint to writing. Translation services will be provided to all complainants, as necessary. All complaints must, however, be signed by the complainant or his/her representative.

Information for filing a Title VI complaint can be accessed on the OUTREACH website at www.outreach3.org or by contacting:

OUTREACH Administration - Mr. Marvin Custodio at 408-678-8585

E-mail inquiries or initial complaints can be sent directly to OUTREACH Administration at marvinc@outreach2.org.

English, Spanish, Vietnamese and Chinese language Title VI protection notification information is available in printed form at OUTREACH business office location (posted in multiple locations open to the public). Multi-lingual translation services are available by calling: 408-678-8585.

Complaint Format

1. All complaints must be in writing and signed by the complainant or his/her representative before action can be taken. Complaints shall state, as fully as possible, the facts and circumstances surrounding the alleged discrimination.
2. OUTREACH will provide the complainant or his/her representative with a written acknowledgement that OUTREACH has received the complaint within ten working days.
3. The following complaint information will be tracked by the Office of Civil Rights on the OUTREACH Title VI Complaint/Investigation log:
 - a. Date the complaint was received by OUTREACH
 - b. Date an acknowledgement letter was sent to the complainant
 - c. Entity
 - d. Protected category
 - e. Program/Activity/Service
 - f. Summary of the allegation
 - g. Status of the complaint
 - h. Was the complaint investigated? Yes or No.
 - i. Action taken
 - j. The response letter was sent to the complainant Action taken

Determination of Investigative Merit

OUTREACH will begin an investigation within fifteen (15) working days of receipt of a valid complaint. A complaint shall be regarded as meriting investigation unless:

1. It clearly appears on its face to be frivolous or trivial.
2. When the time allotted for making the determination of jurisdiction and investigative merit, the party complained against voluntarily concedes noncompliance and agrees to take appropriate remedial action.
3. Within the time allotted for making the determination of jurisdiction and investigative merit, the complainant withdraws the complaint; or
4. Other good cause for not investigation the complaint exists (e.g. respondent is presently under investigation by another Federal

agency.)

Request for Additional Information from Complainant and/or Respondent

In the event that the complainant or respondent has not submitted sufficient information to make a determination of jurisdiction or investigative merit, OUTREACH may request additional information from either party. This request shall be made within 15 working days of the receipt of the complaint and will require that the party submit the information within 60 working days from the date of the original request. Failure of the complainant to submit additional information within the designated time may be considered good cause for a determination of no investigative merit. Failure of respondent to submit additional information within the designated time frame may be considered good cause for a determination of noncompliance.

Investigative Report

OUTREACH will complete an investigation within ninety (90) days of receipt of the complaint. If additional time for the investigation is needed, the complainant will be contacted. A written report will be prepared by the responsible investigator at the conclusion of the investigation. The investigative report will include the following:

1. Summary of the complaint, including a statement of the issues raised by the complainant and the respondent's reply to each of the allegations, citations of relevant Federal, State, and Local laws, rules, regulations and guidelines, etc.
2. Description of the investigation, including a list of the persons contracted by the investigator and a summary of the interviews conducted; and a statement of the investigator's findings and recommendations. A closing letter will be provided to the complainant.



Outreach & Escort, Inc. (OUTREACH)
TITLE VI COMPLAINT FORM

Mr. Marvin Custodio, Title VI Administrator
OUTREACH Administration
2221 Oakland Road
San Jose, California 95131
Phone: 408-678-8585
Email: marvinc@outreach2.org

Section I

Name: _____

Address: _____

Telephone Numbers:

(Home or Cell) _____ (Work) _____

Email Address _____

Accessible Format Requirements?

Large Print: _____ Audio tape: _____

TDD: _____ Other: _____

The Federal Transit Administration (FTA) Office of Civil Rights is responsible for civil rights compliance and monitoring, which includes ensuring that providers of public transportation properly abide by Title VI of the Civil Rights Act of 1964, Executive Order 12898, "Federal Actions To Address Environmental Justice in Minority Populations and Low Income Populations," and the Department of Transportation's Guidance to



Recipients on Special Language Services to limited English Proficient (LEP) Beneficiaries.

In the FTA compliant investigation process, we analyze the complainant's allegations for possible Title VI and related deficiencies by the transit provider. If deficiencies are identified, they are presented to the transit provider and assistance is offered to correct the inadequacies within a predetermined timeframe. FTA may also refer the matter to the U.S. Department of Justice for enforcement.

Section II

Are you filing this complaint on your own behalf?

Yes _____ No _____

(If you answered "yes" to this question, go to Section III.)

If not, please supply the name and relationship of the person for whom you are complaining:

Please explain why you have filed for a third party:



Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.

Yes _____ No _____

Section III

Have you previously filed a Title VI complaint with FTA?

Yes _____ No _____

If yes, what was your FTA Complaint Number? _____

(Note: This information is needed for administrative purposes; the same complaint number may be assigned to the new complaint.)

Have you filed this complaint with any of the following agencies?

Transit Provider: _____ Department of Transportation: _____

Department of Justice: _____ Other: _____

Equal Employment Opportunity Commission: _____

Have you filed a lawsuit regarding this complaint?

Yes _____ No _____

If yes, please provide a copy of the complaint form.

(Note: This above information is helpful for administrative tracking purposes. However, if litigation is pending regarding the same issues, parties defer to the decision of the court.)



Section IV

Name of public transit or paratransit provider complaint is against:

Contact person: _____ Title: _____

Telephone Number: _____

On separate sheets, please describe your complaint. You should include specific details such as names, dates, times, route numbers, witnesses, and any other information that would assist us in our investigation of your allegations. Please also provide any other documentation that is relevant to this complaint.

Section V

May we release a copy of your complaint to the transit/paratransit provider?

Yes _____ No _____

May we release a copy of your identity to the transit/paratransit provider?

Yes _____ No _____

Please sign here: _____ Date: _____

(Note: A signature is required for complaint acceptance.)



COMPLAINT FORM

Mr. Marvin Custodio, Title VI Administrator

OUTREACH Administration

2221 Oakland Road

San Jose, California 95131

Phone: 408-678-8585

Email: marvinc@outreach2.org

California Department of
Transportation
Civil Rights, Equal Employment
Opportunity Program
Sacramento, Ca. 95811
Phone: 1-916-324-0988
Fax: 1-916-324-8430

Federal Transit Administration
Office of Civil Rights
Attention: Complaint Team
1200 New Jersey Ave., SE
Washington, DC 20590
Phone: 1-888-446-4511

Federal Highway Administration
Washington DC Office
Civil Rights Program/Title VI
1200 New Jersey Ave., SE
8th Floor E81-105
Washington DC
Phone: 1-202-336-0693
Fax: 1-202-366-1599



Politica y Procedimiento

Seguimiento e Investigacion de quejas bajo el Titulo VI

Es la política de OUTREACH utilizar sus mejores esfuerzos para asegurar que todos los programas, servicios, actividades y beneficios se implementen sin discriminación. OUTREACH sigue los procedimientos de investigación y el formato de quejas de acuerdo a los requisitos del Título VI. Lo siguiente es el procedimiento de OUTREACH para el seguimiento y la investigación de las denuncias que alegan discriminación por motivos de raza, color u origen nacional.

Cualquier persona que cree que él o ella, de forma individual o como miembro de un grupo específico de personas, ha sido objeto de discriminación por motivos de raza, color, u origen nacional puede presentar una queja con OUTREACH, la Administración Federal de Tránsito (FTA) o la Secretaría del Departamento de Transporte. Además, OUTREACH prohíbe la intimidación, la coacción o la participación en cualquier otra conducta discriminatoria contra cualquier persona porque él o ella ha presentado una demanda para garantizar los derechos protegidos por el Título VI.

Una queja firmada debe ser presentada dentro de los 180 días después de la fecha de la presunta discriminación, a menos que el plazo de la presentación sea extendida por la Secretaría del Departamento de Transporte. OUTREACH exhorta a que las quejas sean inicialmente presentadas a OUTREACH para su resolución. Sin embargo, en casos en que el denunciante no esté satisfecho con la resolución dada por OUTREACH, la misma queja podrá ser presentada a la Administración Federal de Tránsito (FTA) o la Secretaría de Transporte para su investigación. A menos que se permita lo contrario, la determinación final de todas las quejas del Título VI que afecten los programas administrados por FTA serán hechas por la Oficina de la Secretaría del Departamento de Transporte (DOT). El denunciante podrá remitir las quejas por escrito y firmadas a OUTREACH directamente o a las oficinas de FTA como se indica a continuación:

OUTREACH Administration

Mr. Marvin Custodio

2221 Oakland Road

San Jose, California 95131

Phone: 1-408-678-8585

Email: marvinc@outreach2.org

Caltrans Department of Transportation

Civil Rights, Equal Employment
Opportunity Program

700 N. 10th Street, Suite 102B

Sacramento, California 95814

Phone: 916- 324-9461

Federal Transit Administration Office of Civil Rights

Attention: Complaint Team

1200 New Jersey Ave., SE

Washington, DC 20590

Phone: 1-888-446-4511

Federal Highway Administration

Washington DC Office of

Civil Rights Program/Title VI

1200 New Jersey Ave., SE

8th floor E81-105

Washington DC 20590

Phone: 1-202-336-0693

Fax: 1-202-366-1599



En los casos en que el denunciante no esté en condiciones de proporcionar una declaración por escrito, pero desea que OUTREACH o FTA investigue el presunto caso de discriminación, se puede hacer una queja verbal de la discriminación. El denunciante será entrevistado por un funcionario apropiado autorizado para recibir quejas. Si es necesario, el funcionario ayudará al denunciante en la conversión de la queja verbal a la escrita. Los servicios de traducción serán proporcionados a todos los denunciantes como sea necesario. Todas las quejas deben ser firmadas por el denunciante o su representante.

La información para presentar una queja del Título VI se encuentra en el sitio web de OUTREACH en www.outreach3.org o puede ponerse en contacto con: La Administración OUTREACH - Sr. Marvin Custodio at 408-678-8585.

Las quejas por correo electrónico o quejas iniciales pueden ser enviadas directamente a la administración de OUTREACH al admin@outreach2.org.

La información de notificación de protección del Título VI en inglés, español, vietnamés y chino se encuentra disponible en forma impresa en las oficinas de OUTREACH (publicada en múltiple oficinas abiertas al público). Los servicios de traducción para diferentes idiomas se encuentran disponibles llamando al: 408-678-8585.

Dennis Wootten

Mr. Dennis Wootten, CEO



Aprobado por la Junta Directiva de Outreach & Escort el _____.

Formato de quejas bajo el Título VI

1. Todas las quejas deben ser por escrito y firmadas por el denunciante o su representante antes de que se tome acción. Las quejas deberán indicar, en todo lo posible, los hechos y las circunstancias que rodean la presunta discriminación.
2. OUTREACH proporcionará al demandante o su representante / con un acuse de recibo por escrito que OUTREACH ha recibido la queja dentro de un periodo de diez (10) días hábiles.
3. A la siguiente información de la queja se le dará seguimiento por la Oficina de Derechos Civiles en el registro de quejas /investigaciones de OUTREACH Título VI:
 - a. Fecha en que la queja fue recibida por OUTREACH
 - b. Fecha y acuse de recibo fue enviado al denunciante
 - c. Entidad
 - d. Categoría protegida
 - e. Programa/Actividad/Servicio
 - f. Resumen de alegaciones
 - g. Situación actual de la queja
 - h. Se investigó la queja? Sí o No.
 - i. Medidas Adoptadas
 - j. La carta de respuesta fue enviada con la acción tomada al denunciante

Determinación del Mérito Investigativo

OUTREACH iniciará una investigación dentro de quince (15) días hábiles después de haber recibido la queja. Una queja será considerada digna de investigación a menos que:

1. Aparenta claramente a primera vista de ser frívola o trivial.



2. Cuando el tiempo asignado para hacer la determinación de la jurisdicción y el mérito investigativo, la parte demandada reconoce voluntariamente incumplimiento y se compromete a tomar las medidas correctivas apropiadas.
3. Dentro del plazo concedido para efectuar la determinación de la jurisdicción, el denunciante retira la queja, o
4. Existe otra buena causa para no investigar la queja (por ejemplo el demandado está siendo investigando por otra agencia federal.)

Solicitud de información adicional del denunciante y/o demandado En el caso de que el denunciante y/o el demandado no ha presentado suficiente información para hacer una determinación de la jurisdicción o el mérito de investigación, OUTREACH podría solicitar información adicional a cualquiera de las partes. Esta solicitud deberá hacerse dentro de 15 días hábiles apartir de la recepción de la queja y requerirá que la parte que presente la información dentro de los 60 días hábiles apartir de la fecha de solicitud inicial.

En caso que el demandante falle en presentar informacion adicional dentro del plazo estipulado se puede considerer como una buena causa para determinarse sin mérito investigativo. En caso que el demandado falle en presentar información adicional dentro del plazo estipulado, se podría considerar una buena causa para una determinación de incumplimiento.

Informe de Investigación

OUTREACH concluirá una investigación dentro de los noventa (90) días siguientes a la recepción de la queja. Si se necesita más tiempo para la investigación, se le comunicara al denunciante. Se preparara un informe por escrito por el investigador responsable en la conclusión de la investigación. El informe de investigación incluirá lo siguiente:

1. Resumen de la queja, incluyendo una declaración de las cuestiones planteadas por el denunciante y la respuesta del demandado a cada una de las denuncias, citaciones de relevancia Federales, estatales, y las leyes locales, normas y lineamientos, etc.
2. Descripción de la investigación, incluyendo una lista de las personas contratadas por el investigador y un resumen de las entrevistas realizadas; Y una declaración de las conclusiones y recomendaciones. Una carta de conclusion de la investigación se le proporcionara al demandante.



Outreach & Escort, Inc. (OUTREACH)
TITLE VI COMPLAINT FORM

Mr. Marvin Custodio
OUTREACH Administration
2221 Oakland Road
San Jose, California 95131
Phone: 408-678-8585
Email: marvinc@outreach2.org

Sección I

Nombre: _____

Dirección: _____

Números de Teléfonos:

(Casa o Celular): _____ (Trabajo): _____

Correo Electrónico: _____

Requerimientos de formatos accesibles?

Letra Grande: ____ Cinta de Audio: ____

Discapacidad Auditiva/TDD: ____ Otro: ____

La Administración Federal de Tránsito (FTA) Oficina de Derechos Civiles es responsable del cumplimiento de los derechos civiles y

monitoreo, que incluye garantizar que los proveedores de transporte público cumplan debidamente con el Título VI del Acta de Derechos Civiles de 1964, la Orden Ejecutiva 12898, "Acciones federales para abordar un ambiente de justicia en poblaciones minoritarias y de bajos ingresos", y el Departamento de Transporte de Orientación a los Destinatarios en servicios de idiomas a personas de Inglés limitado (LEP) Beneficiarios.

En el proceso de investigación de quejas FTA, se analiza las alegaciones del demandante por el título VI posibles deficiencias relacionadas con el proveedor de tránsito. Si se detectan deficiencias, se presentan al proveedor de tránsito y se ofrece ayuda para corregir las deficiencias en un plazo predeterminado. FTA también podrá remitir el asunto al Departamento de Justicia de EE.UU. para la ejecución.

Sección II

¿Está presentando esta queja por su propia cuenta?

Sí _____ No _____

(Si usted contestó "sí" a esta pregunta, ir a la sección III.)

Si no es así, favor de proporcionar el nombre y relación de la persona por quien usted se está quejando:

Por favor explique por qué usted ha presentado por un tercero:

Por favor, confirme que ha obtenido el permiso de la parte agraviada, si usted está presentando en nombre de un tercero.

Sí _____ No _____

Sección III

¿Ha presentado anteriormente una queja del Título VI con FTA?

Sí _____ No _____

En caso afirmativo, ¿cuál fue su número de queja con FTA? _____
(Nota: Esta información es necesaria con fines administrativos; el mismo numero de queja puede ser asignado a la nueva queja.)

¿Ha presentado esta queja ante cualquiera de las siguientes agencias?

Transit Provider: _____ Departamento de Transporte: _____

Departamento de Justicia: _____ Otro: _____
Equal Employment Opportunity Commission: _____

¿Ha presentado una demanda con respect a esta queja?

Sí _____ No _____

En caso afirmativo, por favor proporcione una copia del formulario de queja.

(Nota: Esta información en útil con fines de seguimiento administrativo. Sin embargo, si el litigio en relacion con los mismos problemas esta pendiente, las partes aplazaran la decisión de la corte.)

Sección IV

Nombre de Tránsito public o proveedor de paratransito que esta en contra de:

Persona a contactar: _____ Título: _____

Numero de teléfono : _____

En hojas por separado, por favor describa su queja. Usted puede incluir detalles específicos, tales como nombres, fechas, horas, numeros de ruta, testigos y cualquier otra información que nos ayude en nuestra investigación de sus denuncias. Sirvase también proporcionar cualquier otra documentación que sea relevante para la presente queja.

Sección V

Podemos proporcionar una copia de su queja al proveedor de tránsito/paratransito?

Sí _____ No _____

Podemos proporcionar una copia de su identidad al proveedor de tránsito/paratransito?

Sí _____ No _____

Por favor firme aquí: _____ Fecha: _____

(Note: Se requiere una firma para la aceptación de la queja.)

FORMULARIO DE QUEJA

Mr. Marvin Custodio
OUTREACH Administration
2221 Oakland Road
San Jose, California 95131
Phone: 408-678-8585
Email: marvinc@outreach2.org

Caltrans Department of
Transportation
Civil Rights, Equal Employment
Opportunity Program
700 N. 10th Street, Suite
102B
Sacramento, California
95814
Phone: 916- 324-9461

Federal Transit Administration
Office of Civil Rights
Attention: Complaint Team
1200 New Jersey Ave., SE
Washington, DC 20590
Phone: 1-888-446-4511

Federal Highway
Administration
Washington DC
Office of
Civil Rights Program/Title VI
1200 New Jersey Ave., SE
8th floor E81-105
Washington DC 20590
Phone: 1-202-336-0693
Fax: 1-202-366-1599

#3. Title VI Tracking Form – List of any public Transportation Title VI investigations, complaints or lawsuits filed since last submission
(none to report)

Outreach & Escort, Inc. Title VI Tracking Form

Title VI Tracking Report						
Date Submitted	Tracking Number	Description of Concern	Submitted By Employee (E) Constituent (C) Vendor (V) Stakeholder (S) Other (O)	Current Status: R – Resolved UI – Under Investigation D – Dismissed W – Withdrawn P – Pending/ No Action	Actions Taken	
					Date	Comments

41

#4. Title VI Public Participation Plan – Promoting Inclusive Public Participation



Outreach & Escort, Inc. Title VI Public Participation Plan

I. Background

In accordance with Title VI of the Civil Rights Act of 1964, Executive Orders 12898 and 13166 and Federal Transit Administration (FTA) Circular 4702.1B, Outreach & Escort, Inc. (AKA Outreach) has developed this Public Participation Plan (PPP) to guide public involvement efforts and improve the ability of public involvement in Outreach Programs' decision making process by low-income, minority and Limited English Proficiency (LEP) communities.

Purpose

Outreach's primary goal in developing this program is to ensure that all individuals who rely upon Outreach services either as direct customers, family members, care assistants, care center or hospital staff, etc. are able to have a voice in the decision making for services and programs. It is also a goal of Outreach to ensure that individuals and communities who may have historically had difficulty participating in public decision-making are able to participate in future decision-making, including low-income, minority and Limited English Proficiency (LEP) communities.

To this end, Outreach does not duplicate or replicate the Title VI participation efforts and plans of public agencies in the region. In contrast, Outreach participates, contributes, and whenever possible helps to a) inform vulnerable populations of the ability to participate, voice their opinions, and help craft decisions for desired outcomes at public agencies; and b) Outreach often transports or provides free mobility options to reduce barriers to attending such public meetings.

Outreach also offers and participates in various meetings and community



outreach with the hope of empowering low income, minority, and LEP communities throughout our service area in playing an active role in Outreach's planning process.

FTA Circular 4702.1B states that with respect to planning public involvement measures:

The content and considerations of Title VI, the Executive Order on LEP, established public participation plan or process (i.e., the document that explicitly describes the proactive strategies, procedures, and desired outcomes that underpin the recipient public participation activities).

Outreach, as a 501(c)3 non-profit, is generally a sub-recipient of funding). Sub-recipients have latitude to determine how, when, and how often specific public participation activities should take place, and which specific measures are most appropriate.

Sub-recipients of Federal funding should make determinations based on the type of public involvement process planned by the sub-recipient and the resources available to a non-profit agency. Efforts to involve minority and low-income people in public involvement activities can include both comprehensive measures, such as placing public notices at community centers and in vehicles and measures to overcome linguistic, institutional, cultural, economic, historical, or other barriers that may prevent minority and low-income people and populations from effectively participating in - making process (FTA C 4702.1B, p IV-5).

The Public Participation Plan describes the overall goals, guiding principles and methods that Outreach uses regularly to reach out to low-income, minority and LEP communities. Outreach stays informed about public agency opportunities for public input and works with our customers and the other agencies that serve vulnerable populations to facilitate participation and involvement in the identification of social, economic and environmental impacts of proposed transportation decisions at recipient/grantee



organizations such as governmental bodies. Concurrently, Outreach interacts with our customers, care-givers, and the service entities to provide early and continuous input on current as well as future services offered by Outreach as a sub-recipient agency.

Ways to do this include group, small-group and individual one-on-one meetings aimed at accommodating minority and LEP communities, coordinating closely with community- and faith based organizations, educational institutions, and other organizations in conducting outreach targeted at minority and LEP communities; the consideration of effective strategy using various culturally and linguistically appropriate sources who are part of the LEP populations; utilizing other means of communication other than writing, including the use of audio or video recording, translations, and ADA accommodations; and using volunteers from various ethnic minority and LEP communities to inform their peers in the community by phone and in-person. Most important, since our War on Poverty days in the 1970s, Outreach has always had social workers, case managers, and more recently mobility managers who are well trained in effective outreach, information and referral, information and assistance, and who can engage LEP communities as they are multi-cultural and multi-lingual professionals.

This Public Participation Plan is a tailored plan that describes how Outreach will undertake public involvement, information, education, participation and/or outreach activities.

Historical Context

Outreach is a local non-profit entity that has had a history of functioning as a CTSA for Santa Clara County and as a Mobility Management Center. Outreach began as a "War on Poverty" organization and continues to provide coordinated services to persons with disabilities, seniors, veterans, low-income individuals, and other vulnerable populations.



Since the last Title VI Plan, Outreach provided ADA Paratransit services through November 2016. Outreach is a local brand name and continues to get many calls for paratransit services. Outreach supports VTA's new program by taking calls from the public and doing I&R (information and referral) and I&A (information and assistance) to connect the public to VTA's current paratransit program.

Since the last Title VI Plan, Outreach provided increased access to services having applied for and become the sub-recipient of a VTCLI (Veterans Transportation and Community Living Grant). The purpose was to connect Veterans not only to transportation and mobility resources but to health and human resources as well. Outreach's "One Call & One-Click" center will continue to be updated to remain current with resources that serve not only Veterans, but LED populations, seniors, economically disadvantaged, persons with disabilities among others.

On a day to day basis, the work that O&E performs is on a very "human scale", as each rider interactively arranges their reservation for transport and the vehicles Outreach utilize carry a small number of passengers. This one-on-one "human scale" and person-centered approach, enables the customers/the public have an opportunity to communicate with and influence changes and improvements made to the service, as well as voice any of their concerns. Outreach adheres to a "person-centered" and "rider-choice" approach one-on-one with the public.

II. Outreach Services Public Involvement Opportunities

Outreach provides/participates in a variety of committees that are designed to take comments from the public, from community organizations, faith-based groups, and customers. Committee meetings are held at locations that are accessible for individuals with disabilities and in locations that are accessible to public transit routes (as well as easily accessible by Outreach's own services). Furthermore, every effort is made for meetings to be held at convenient times to the maximum extent practicable.



Outreach attended and participated in fewer face to face activities with other agencies, nonprofits and public groups due to the Covid pandemic. Like others, Outreach participated in zoom meetings and other strategies to stay connected.

Outreach regularly goes to where our target population lives such as low-income housing for diverse and disabused seniors. During the pandemic, strategies needed to change but contacts by phone continued

Outreach has a history of serving Veterans with mobility options and reaches out to this population through various contact strategies.

Outreach participates with MTC's Coordinated Plan update process and communicates internally, with local non-profits, faith-based groups, service groups, and advocacy groups.

Outreach participated in meetings as feasible to better serve populations/LED/low-income/ethnic minorities/seniors/persons with disabilities/individuals living in communities of concern who have challenges accessing healthy food and wellness services.

Outreach makes one-on-one travel arrangements for customers when paratransit or transit are not an option; and/or if advocacy is best done outside of the local area and transportation for attending key meetings in the region or Sacramento is desired.

Outreach provides presentations throughout the community and at a variety of locations to inform members of the public of mobility options, including but not limited to walking programs Outreach hosts, volunteer driver programs Outreach offers, access to bus passes for low-income persons across ethnic, cultural and linguistic groups, demand responsive services, among other resources. At such presentations, one-on-one follow-up with individuals is offered.



III. Methods of Notifying Customers of Upcoming Meetings, Services and Resources

Outreach utilizes a variety of methods to reach out to the community to both inform the community as to the work that Outreach is doing and also to inform Outreach customers about changes that may come to the service that they rely upon and to attend meetings sponsored by local public agencies, Outreach, or other entities serving vulnerable populations.

Phone Announcements

Recordings on call center phone system inform individuals of coming meetings, service changes, and other opportunities to participate and influence services. Callers can reach a live call agent/mobility manager for additional information and options. In FY 20-21, outreach engaged in 23,204 call specific to mobility options and 20% of the calls were in Spanish and 10% in Vietnamese.

Websites

Outreach's website is a helpful tool and source of information for its customers. Dates, times and locations of upcoming meetings are all posted on the front page of the website, including any important notifications such as a fare change. In addition, there is a plethora of information to be found on the website, including rider guides, applications for services, and links to resources including our One Call & One-Click web site, and all websites can be viewed and/or translated into language of choice using Google translate already built into the site.

In-vehicle Flyers & Mail-Outs

Inserting flyers in Outreach vehicles is a method for announcing upcoming meetings to the customers. Information is available in accessible formats and in multiple languages and translations available. Flyers are also enclosed in correspondence to program participants, care-givers, family



members and service organizations about meetings, changes in services, and ways to voice opinions by phone, mail, email, web page access and so forth.

Advertisement with Partner Organizations

Outreach, due to its nature of providing specialized transportation to individuals with disabilities, older adults, Veterans, low-income individuals and families, has a variety of partner organizations in the human services and transportation services. When Outreach wishes to share information, it can advertise with managers of these human service and transportation service partners at centers/program or by center/program staff sharing such information

Customer Satisfaction Survey

Outreach is a nonprofit organization that serves minority, low-income, limited-English speaking populations, many of whom are disabled, older adults, reside in low-income households and communities of concern and some are Veterans. What these populations have in common are challenges to information, resources, and barriers to mobility. Outreach surveys its customers to assess the impact of services provided towards addressing individual challenges. Feedback enables one to better design and deliver agency services as well as to bring forth needs and strategies to the broader community through public agency forums, meetings, and planning opportunities.

Mobility Managers & Multi-Cultural and Multi-Lingual Volunteers

Outreach utilizes multi-cultural and multi-lingual mobility managers with training in social services, case management and transportation services. Mobility managers go into the households, community centers, and other locations to work one-on-one to assess mobility needs and mobility options



resources. Participants of these sessions can better articulate their own needs and preferences through this process. Participants become advocates for themselves and their communities. Participants are informed of meetings and planning sessions or other such opportunities so they can voice their opinions. Outreach provides transportation options to any such meeting at no cost to the participants.

Outreach mobility managers work directly with multi-lingual and multi-cultural volunteers from various communities in order to provide more authentic communication and improved understanding. Alternative advertising/marketing/information strategies are used that involve more organized meetings out in the community at centers/programs or hosted by Outreach at our meeting rooms; small group interactions with the public to ensure informational resources are understood and questions can be asked and participation can be encouraged; and one-on-one individual assistance and continued support. These varying community interactions and group vs individual approaches better ensure that underserved members of the public and our customers can have a voice in their communities and for themselves.

VIII. Moving Forward

Outreach's goal is to continue to provide services without excluding or discriminating against individuals on the basis of race, color and national origin. In addition to the Title VI protected categories, Outreach shall continue to take steps to ensure that our programs and activities do not exclude or discriminate against low-income individuals or other classes protected by Federal or State law.

Outreach shall continue to engage in the strategies in I – VII above and adapt as needed.

Outreach shall continue to find ways to make transportation affordable and accessible to target populations as has been one of our objectives for decades.



Outreach shall continue to be a voice for equity, social justice, environmental justice, by participating with the public, public agencies responsible for decision-making, engaging with the non-profit and faith based communities of service providers and organizations, and most importantly working one-on-one with individuals regardless of race, color, national origin and with limited-English capabilities.

Diversity: Outreach staff and volunteers who engage on committees or help deliver information to protect and vulnerable populations remain very diverse and comparable to the diversity of the population at large.

IX. Closing

Outreach is not a public agency but a nonprofit organization who engages in a large variety of means of communication with both its own customers based of individuals as well as to share information about Outreach services at public/community/program meetings and locations through the area.

Outreach utilizes many strategies and means to inform our customers, care-givers, community programs and service providers of opportunity to engage in decision making at public agencies.

Outreach provides mobility options to reduce barriers to attending meetings and often provides free transportation.

Outreach provides advocacy and other means of soliciting input and organizing that input to get to public agency decision makers on behalf of low-income, minority and LEP populations among other vulnerable populations.

Outreach engages our customers and the broad public in a range of meeting sizes and accessible locations, focusing on participation out in the community in small groups and one-on-one with the target populations.



Outreach surveys participants of services for feedback and continuous improvement.

Our participation plan is meant to be a living document that will continuously be updated and Outreach graciously accepts recommendations on how to improve our efforts.

#5. Limited English Proficiency (LEP) Plan



Outreach & Escort, Inc. (OUTREACH)

Limited English Proficiency (LEP) Plan

And ADA Accommodation

Approved by Outreach & Escort Board of Directors 11/28 2022
For FY22–FY24

I. Introduction

This *Limited English Proficiency Plan* has been prepared to address OUTREACH's responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq, and the implementing regulations, which state that no person shall be subjected to discrimination on the basis of race, color or national origin.

Executive Order 13166 - "Improving Access to Services for Persons with Limited English Proficiency", requires that recipients of Federal financial assistance provide meaningful access to LEP applicants and beneficiaries. The Executive Order establishes that differing treatment based upon a person's inability to speak, read, write or understand English is a type of national origin discrimination. It directs each federal agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discrimination does not take place. This order applies to all State and local agencies that receive federal funds.

II. Plan Summary

OUTREACH has developed this *Limited English Proficiency Plan* to help identify reasonable steps for providing language assistance to persons with limited English proficiency (LEP) who wish to access services provided by OUTREACH. As defined in Executive Order 13166, LEP persons are: Those who do not speak English as their primary language; and have a limited ability to read, write, speak or understand-English, as a result of national origin.

This plan outlines how to identify a person who may need language assistance, the way in which assistance may be provided, staff training that may be required, and how to notify LEP persons that assistance is available.

In order to prepare this plan, OUTREACH undertook the U.S. DOT four-factor LEP analysis which considers the following factors:

1. The number or proportion of LEP persons in the service area who may be served or are likely to encounter an OUTREACH program, activity or service,
2. The frequency with which LEP persons come in contact with OUTREACH programs, activities or services,

3. The nature and importance of programs, activities or services provided by OUTREACH to LEP individuals, and
4. The resources available to OUTREACH and overall cost to provide LEP assistance.

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

III. Four-Factor Analysis

1. *The number or proportion of LEP persons in the service area who may be served or are likely to encounter an OUTREACH program, activity or service.*

The Census Bureau has a range of four classifications of how well people speak English. The classifications are “very well,” “well,” “not well,” and “not at all” as Limited English Proficient persons.

Table 1: LANGUAGE SPOKEN AT HOME FOR THE POPULATION 5 YEARS AND OVER. Language Spoken at Home by Ability to Speak English, Persons Age 5 years and Over, 2016-2020, San Francisco Bay Area, American Community Survey 2016-2020
Data for Santa Clara County

Speaks English Less than “Very Well”	2012-2016 Number	2012-2016 Percentage	2020 Number	2020 Percentage
Spanish	131,546	7.5%	118,954	6.57%
Korean	2,968	0.7%	10,719	0.59%
Chinese	15,265	3.6%	78,198	4.32%
Vietnamese	17,386	4.1%	75,218	4.15%
Tagalog	4,664	1.1%	19,062	1.05%
Other Languages	219,186	12.4%	302,151	14.7%
Total Speaking English Less than “Very Well”	391,015	22.2%	354,229	20%
Speaks English “Very Well”	1,373,357	77.8%	1,462,377	80%
TOTAL	1,764,372	100%	1,816,606	100%

Notes: Tabulation prepared by VTA staff based on data from the American Community Survey (ACS) 2016-2020.

Updated information from the 2016-2020 ACS survey is based on estimates but the ACS survey did specifically break out **the Spanish number and percentile and Spanish is the one language that exceeded the 5% threshold.**

A. The Total Population for Santa Clara County was 1,894,783, although this number may not be precise due to independent rounding. The source was the U.S. Census, State of California, Department of Finance, Demographic Research Unit. This was cited in the Santa Clara Valley Transportation Authority’s Annual Comprehensive Financial Report for the Fiscal year Ended June 30, 2022. (Page 3-18).

B. Other sources may vary such as the State of California Department of Finance with a 2020

population estimated at 1,996,394. Per the 2017 American Community Survey, 5-Year Estimates, 12% of the population in the county is 50-74 years of age, consistent with the state at 13% (Sourcewise page 29).

C. The 2019 data from the U.S. Census Bureau American Community Survey 5-Year Estimates, Table B01001; 2050 data from the MTC Plan Bay Area, reports older adults in SCC at 12% in 2019 and expected to go to 13% by 2035; same data sets reported 8% of the populations in SCC living with a disability in 2019 and for that to remain at that level by 2035 but for persons over 60 years of age that percentage was higher at 31% in 2019.

D. Per the California Department of Finance, the older adult population of 60 plus years is becoming more diverse in Santa Clara County (Area Plan on Aging, 2020-2024) between 2010 and 2020. (Marvin, pages 3 and 5 in Nelson Nygaard's "MTC Coordinated Plan TAC Third Meeting May 2, 2002, draft).).

E. Languages Spoken at Home (U.S. Census) 2021 provides additional data to the United Census Bureau, 2016-2020 American Community Survey. Table B16001: 5-year estimate based on 2015 data. As reflected in the table, the top five non-English Languages Spoken in Santa Clara County for persons over 5 years of age "who speak English less than well" are in descending order: 6.57% Spanish (118,954); 4.32% Chinese (Mandarin and Cantonese) (78,198; 4.15% Vietnamese (75,218); 1.09% Tagalog (19,062); and 0.59% Korean (10,719). (VTA Title VI page 97).

As a non-profit organization, special attention is focused on meeting the needs of older adults and persons with disabilities. Per the California Department of Finance, the older adult population of 60 plus became more diverse between 2010 and 2020 in SCC (Area Plan on Aging, 2020-2024) and Outreach will accommodate this cultural and language diversity. Per the 2019 data from the U.S. Census Bureau American Community Survey 5-Year Estimates, Table B01001; 2050 data from the MTC Plan Bay Area, older adults in SCC were reported at 12% in 2019 and expected to go to 13% by 2035; same data sets reported 8% of the populations in SCC living with a disability in 2019 and for that to remain at that level by 2035. ADA accommodations shall also be made.

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

OUTREACH assessed the frequency with which staff and drivers have, or could have, contact with LEP persons. The following “touch points” and frequencies have been identified:

PRIMARY TOUCH POINTS	FREQUENCY
Drivers	Frequently
OUTREACH Eligibility	Frequently
Rider’s Guide	Often- Frequently
Dispatchers/Schedulers	Often
Mobility Managers	Often
Website	Occasionally
Social Workers/Case Managers	Often

SECONDARY “TOUCH POINTS”	FREQUENCY
Office Staff	Occasionally
Road Supervisors	Rarely
Print Media	Occasionally

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

The largest geographic concentration of LEP individuals in the OUTREACH service area are speakers of Spanish followed by Asian languages. Community transportation and social services targeting low-income individuals, persons with disabilities, and older adults are most likely to encounter LEP individuals.

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

OUTREACH assessed available resources that could be used for providing LEP assistance, including determining: how much a professional interpreter and translation service would cost on an as-needed basis, how to access quality translation services or tools at no cost, which of documents would be the most valuable to be translated if the need should arise, and an inventory of available organizations that OUTREACH could partner with for OUTREACH’s translation efforts.

Safe Harbor Provision – The Federal Transit Administration Circular 4702.1B states: “The Safe Harbor Provision stipulates that, *if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with*

the recipient's written translation obligations. Translation of non-vital documents, if needed, can be provided orally. If there are fewer than 50 persons in a language group that reaches the five percent (5%) trigger, the recipient is not required to translate vital written materials but should provide written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost.

These safe harbor provisions apply to the translation of written documents only. They do not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable. A recipient may determine, based on the Four Factor Analysis, that even though a language group meets the threshold specified by the Safe Harbor Provision, written translation may not be an effective means to provide language assistance measures. For example, a recipient may determine that a large number of persons in that language group have low literacy skills in their native language and therefore require oral interpretation. In such cases, background documentation regarding determination shall be provided to FTA in the Title VI Program."

Based on the four-factor analysis, Spanish is the quantifiable population that are limited-English proficient. However, vital documents, including all Title VI related documents, are available not only in Spanish but also Chinese and Vietnamese.

IV. Limited English Proficiency (LEP) Plan Outline

There are five areas that comprise OUTREACH's LEP Plan:

1. Identifying LEP individuals who need language assistance
2. Language assistance measures
3. Training Staff
4. Providing Notice to LEP Plan
5. Monitoring and updating the LEP Plan

1. Identifying LEP individuals who need language assistance

How OUTREACH may identify an LEP person who needs language assistance

- Examine records for language assistance that had been received in the past, to determine what kinds of language assistance may be needed in the future.
- Examine applications that are currently in languages other than English (e.g. Spanish, and Vietnamese, etc.) to see demand and also track any requests for other language assistance to apply for agency programs and services.
- When OUTREACH sponsors an event, have a staff person greet participants as they arrive. By informally engaging participants in conversation determine if they will need language assistance to fully participate. Track such information for future events.
- Have Census Bureau *Language Identification Flashcards* available at OUTREACH events near the registration table of event, and at front desk of business office location. Individuals self-identify as persons not proficient in English may not be able to be accommodated with translation assistance at the event, but it will assist in identifying language assistance needs for future events.
- Have *Language Identifying Flashcards* on all vehicles to assist coach operators in identifying specific language assistance needs of passengers. If such individuals are encountered, vehicle operators will be instructed to record and report so OUTREACH staff can follow-up with the client.
- Mobility Management and other staff who interact with the public and clients or who deliver trips will also be instructed to maintain records of LEP individuals needing assistance in person or over the phone so that requests for language assistance can be tracked in the appropriate database.
- OUTREACH provides emergency specific *Language Identifying Assistance* flash cards in multiple languages to assist drivers to communicate with LEP riders during or after an emergency/disaster. Drivers will report back to dispatch any instances of

the use of these tools for purposes of recording and follow-up with the customer to determine any future assistance needed.

2. Language Assistance Measures

There were and will continue to be numerous language assistance measures available to LEP persons, including both oral and written language services. There are also various ways in which OUTREACH staff responded to LEP persons, whether in person, by telephone or in writing.

How OUTREACH assisted or will assist an LEP person who needs language assistance.

- OUTREACH continued and will continue to provide vital information to LEP groups on OUTREACH programs and services;
- Networked with human service organizations and internal agency programs that provide services to LEP individuals and sought opportunities to provide information on OUTREACH programs and services;
- Provided a bilingual Community OUTREACH Coordinator at community events, other public events, and meetings as needed;
- Placed statements in notices and publications that interpreter services are available for these meetings, with reasonable advance notice;
- Tracked information from front-line staff concerning any contacts with LEP persons during the previous year;
- Provided *Language Identification Flashcards* at the front desk, onboard OUTREACH vehicles and other locations as appropriate;
- Posted the OUTREACH Title VI Policy and LEP Plan on the agency website, www.outreach3.org;
- Provided group travel training to LEP persons with the assistance of bilingual staff;
- Included language “Spanish a plus” and “Bilingual a plus” on employee and volunteer recruitment materials;
- OUTREACH website has the capability for a person to select a language, click and have automatic translation services via Yahoo! Babelfish and google Translate;
- When an interpreter is needed for a language other than English in person or on the telephone, staff will attempt to access language assistance from a professional translation service or qualified community volunteers or social workers/case

managers.

- For the hearing impaired: Sign-language interpreters will be provided upon request. Video Relay Services (VRS) which is always and VRS is a form of the Telecommunications Relay Service (TRS) that enables persons with hearing disabilities to use American Sign Language (ASL) to communicate with voice telephone users through video equipment, rather than through typed text.

3. **Staff Training**

How OUTREACH trained staff and continues to train staff on its role and responsibilities in providing meaningful access to services for LEP persons

- Developed curriculum and corresponding PowerPoint presentations to educate OUTREACH staff on Title VI LEP requirements for providing meaningful access to services for LEP persons;
- Provided staff with a description of language assistance services offered by OUTREACH;
- Provided staff with specific procedures to be followed when encountering an LEP person, including how to handle a potential Title VI/LEP complaint;
- Instructed staff on the use of FTA *Language Identification Flashcards*;
- Instructed staff on the use of on-line translation tools via <http://translate.google.com> or <http://babelfish.yahoo.com/> with appropriate editing for accuracy by qualified persons, etc.

4. **Providing Notice to LEP Persons**

How OUTREACH provided and continues to provide Notice to LEP Persons, both oral and written communications;

- Offered general information, such as operation hours and services through phone system.
- Used greetings, both Spanish and English, directing callers to select which language they prefer;
- Continued to provide the Rider's Guide in English and Spanish and accessible formats

- Continued to translate vital documents and ensure they are accurate (vital documents are defined as those documents without which a person would be unable to access services)

The following are written communications printed in both English and Spanish:

- Riders Guide which contains information on fares, accessibility, and general riding information;
- Applications for services; and
- All Title VI and LEP materials
- Provided printed information in multiple languages about OUTREACH's non-discrimination policies and information on the local/federal complaint process, place them on the agency's website and have them available at public meetings;
- Provided a tagline affirming OUTREACH will make reasonable accommodations to translate any materials into Spanish or provide an interpreter at public hearings and meetings;

5. **Monitoring and updating the LEP Plan**

This plan is designed to be flexible, and should be viewed as a work in progress. As such, it is important to consider whether new documents and services need to be made accessible for LEP persons, and also to monitor changes in demographics and types of services.

OUTREACH updates the LEP every three (3) years, as required by U.S. DOT.

How OUTREACH will examine and update its LEP Plan:

- Record and report how on the number of LEP persons were encountered annually through OUTREACH's compliance efforts; Determine if needs were reasonably met through OUTREACH's bilingual staff, language and translation assistance, etc.
- Determine how the needs of LEP persons have been addressed;
- Participate with external entities authorized to do transportation planning in the state, region and local level as they assess the needs and plan for current LEP population in the service area;
- Determine whether agency financial resources are sufficient to fund language assistance resources needed;

- Determine whether OUTREACH and its Contractor(s) have fully complied with the goals of this LEP Plan;
- Determine whether complaints have been received concerning the agency's failure to meet the needs of LEP individuals; and
- Obtain input from customers on a regular basis about their language needs.

IV. Dissemination of the OUTREACH LEP Plan

How the OUTREACH LEP Plan will be disseminated to customers and the community;

A link to the OUTREACH LEP Plan and the Title VI Plan will be included on the OUTREACH website: www.OUTREACH3.org

OUTREACH's LEP Plan will also be shared with human service organizations in its service area.

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

Questions or comments regarding the LEP Plan may be submitted to the OUTREACH Executive Director as follows:

Marvin Custodio, Title VI Administrator
2221 Oakland Rd. Suite #200
San Jose, CA 95131
(408) 678-8585

Appendix A: Title VI Program Limited English Proficiency (LEP) Reporting Form and ADA Accommodation Form

**Title VI Program Limited English Proficiency (LEP)
Reporting Form and ADA Accommodation Form**

Name: _____

Date: _____

Walk-In/Direct Contact: _____ Telephone: _____ In Writing: _____

In Public Setting: _____

How was the interpreter/translation services provided?

Staff: _____

Contractor Staff: _____

Volunteer: _____

Phone Interpreter Service: _____

Other: _____

Language: _____

ADA Accommodation Need: _____

ADA Format or Method: _____

Length of Time to Provide Service: _____

#6. Table depicting racial breakdown of transit-related, non-elected planning boards, advisory councils or committees (Outreach is a non-profit).

Outreach & Escort, Inc.

Non-profit

Board of Directors and Advisory/Volunteer

Racial Characteristics

Race	Percent
Caucasian	37.5
Hispanic	25
African American	12.5
Asian American	25
Native American	0
Total	100

Outreach reaches out to members of the community, business community, to clients and care-givers, and to the general public to engage and encourage diverse participation. In addition to race/ethnicity, Outreach attempts to attract persons with varying functional abilities/disabilities and age as the agency serves persons with disabilities, older adults and low-income persons of all ages.

#7. No facility has been constructed so no Title VI equity analysis needed –
Not applicable.

#8. Sub-recipient is not a fixed route provider or public agency – Not applicable.

#9. Outreach non-profit Board Approval Action for Title VI Program



OUTREACH & ESCORT, INC. RECORD OF BOARD ACTION

On 11/28/22, the Outreach & Escort, Inc. Board of Directors approved the following:

FTA Certifications and Assurances

Title VI Materials and Documentation including but not limited to:

- Notification of Title VI Protections with Locations of Notice
- Title VI Complaint Procedure, How to File A Complaint and Complaint Form (Tracking and Investigating Process)
- Outreach & Escort, Inc. Title VI Tracking Form (No complaints to report)
- Outreach & Escort, Inc. Title VI Public Participation Plan
- Outreach & Escort, Inc.'s Limited English Proficiency Plan

By:


Signature

Russell Klein, Chairman



Title VI Complaint Procedure How to File a Complaint And Complaint Form

Tracking and Investigating Process

It is the policy of OUTREACH to employ its best efforts to ensure that all programs, services, activities and benefits are implemented without discrimination. OUTREACH follows complaint investigation and format procedures which are in keeping with Title VI requirements. The following is the OUTREACH procedure for tracking and investigating complaints alleging discrimination on the basis of race, color or national origin.

Any person who believes that he or she, individually or as a member of any specific class of persons, has been subjected to discrimination on the basis of race, color, or national origin may file a written complaint with OUTREACH, the Federal Transit Administration (FTA) or the Secretary of Transportation. Further, OUTREACH prohibits intimidation, coercion or engagement in other discriminatory conduct against anyone because he or she has filed a complaint to secure rights protected by Title VI.

A signed complaint must be filed within 180 days after the date of the alleged discrimination, unless the time for filing is extended by the Secretary of Transportation. OUTREACH encourages complaints to be initially filed with OUTREACH for resolution. However, in those cases where the complainant is dissatisfied with the resolution by OUTREACH, the same complaint may be submitted to the FTA or the Secretary of Transportation for investigation. Unless otherwise permitted, the final determination of all the Title VI complaints affecting programs administered by the FTA will be made by the Office of the Secretary, Department of Transportation (DOT).

Complainants may submit signed written complaints to OUTREACH and/or directly to the FTA offices identified below:

Mr. Marvin Custodio, Title VI Administrator

OUTREACH Administration

2221 Oakland Road

San Jose, California 95131

Phone: 408-678-8585

Email: marvinc@outreach2.org

Caltrans Headquarters

California Department of

Transportation

Civil Rights, Equal Employment

Opportunity Program

Sacramento, Ca. 95811

Phone: 1-916-324-0988

Fax: 1-916-324-8430

Federal Transit Administration

Office of Civil Rights

Title VI Program

1200 New Jersey Avenue, SE

Washington, DC 20590

Phone: 1-888-446-4511

Federal Highway Administration

Washington DC Office

Civil Rights Program/Title VI

1200 New Jersey Ave., SE

8th Floor E81-105

Washington DC

Phone: 1-202-336-0693

Fax: 1-202-366-1599

In cases where the complainant is unable or incapable of providing a written statement but wishes OUTREACH or the FTA to investigate alleged discrimination, a verbal complaint of discrimination may be made. The complainant will be interviewed by an appropriate official authorized to

receive complaints. If necessary, the official will assist the complainant in converting the verbal complaint to writing. Translation services will be provided to all complainants, as necessary. All complaints must, however, be signed by the complainant or his/her representative.

Information for filing a Title VI complaint can be accessed on the OUTREACH website at www.outreach3.org or by contacting:

OUTREACH Administration - Mr. Marvin Custodio at 408-678-8585

E-mail inquiries or initial complaints can be sent directly to OUTREACH Administration at marvinc@outreach2.org.

English, Spanish, Vietnamese and Chinese language Title VI protection notification information is available in printed form at OUTREACH business office location (posted in multiple locations open to the public). Multi-lingual translation services are available by calling: 408-678-8585.

Complaint Format

1. All complaints must be in writing and signed by the complainant or his/her representative before action can be taken. Complaints shall state, as fully as possible, the facts and circumstances surrounding the alleged discrimination.
2. OUTREACH will provide the complainant or his/her representative with a written acknowledgement that OUTREACH has received the complaint within ten working days.
3. The following complaint information will be tracked by the Office of Civil Rights on the OUTREACH Title VI Complaint/Investigation log:
 - a. Date the complaint was received by OUTREACH
 - b. Date an acknowledgement letter was sent to the complainant
 - c. Entity
 - d. Protected category
 - e. Program/Activity/Service
 - f. Summary of the allegation
 - g. Status of the complaint
 - h. Was the complaint investigated? Yes or No.
 - i. Action taken
 - j. The response letter was sent to the complainant Action taken

Determination of Investigative Merit

OUTREACH will begin an investigation within fifteen (15) working days of receipt of a valid complaint. A complaint shall be regarded as meriting investigation unless:

1. It clearly appears on its face to be frivolous or trivial.
2. When the time allotted for making the determination of jurisdiction and investigative merit, the party complained against voluntarily concedes noncompliance and agrees to take appropriate remedial action.
3. Within the time allotted for making the determination of jurisdiction and investigative merit, the complainant withdraws the complaint; or
4. Other good cause for not investigation the complaint exists (e.g. respondent is presently under investigation by another Federal

agency.)

Request for Additional Information from Complainant and/or Respondent

In the event that the complainant or respondent has not submitted sufficient information to make a determination of jurisdiction or investigative merit, OUTREACH may request additional information from either party. This request shall be made within 15 working days of the receipt of the complaint and will require that the party submit the information within 60 working days from the date of the original request. Failure of the complainant to submit additional information within the designated time may be considered good cause for a determination of no investigative merit. Failure of respondent to submit additional information within the designated time frame may be considered good cause for a determination of noncompliance.

Investigative Report

OUTREACH will complete an investigation within ninety (90) days of receipt of the complaint. If additional time for the investigation is needed, the complainant will be contacted. A written report will be prepared by the responsible investigator at the conclusion of the investigation. The investigative report will include the following:

1. Summary of the complaint, including a statement of the issues raised by the complainant and the respondent's reply to each of the allegations, citations of relevant Federal, State, and Local laws, rules, regulations and guidelines, etc.
2. Description of the investigation, including a list of the persons contracted by the investigator and a summary of the interviews conducted; and a statement of the investigator's findings and recommendations. A closing letter will be provided to the complainant.



**Outreach & Escort, Inc. (OUTREACH)
TITLE VI COMPLAINT FORM**

Mr. Marvin Custodio, Title VI Administrator

OUTREACH Administration

2221 Oakland Road

San Jose, California 95131

Phone: 408-678-8585

Email: marvinc@outreach2.org

Section I

Name: _____

Address: _____

Telephone Numbers:

(Home or Cell) _____ (Work) _____

Email Address _____

Accessible Format Requirements?

Large Print: _____ Audio tape: _____

TDD: _____ Other: _____

The Federal Transit Administration (FTA) Office of Civil Rights is responsible for civil rights compliance and monitoring, which includes ensuring that providers of public transportation properly abide by Title VI of the Civil Rights Act of 1964, Executive Order 12898, "Federal Actions To Address Environmental Justice in Minority Populations and Low Income Populations," and the Department of Transportation's Guidance to



Recipients on Special Language Services to limited English Proficient (LEP) Beneficiaries.

In the FTA compliant investigation process, we analyze the complainant's allegations for possible Title VI and related deficiencies by the transit provider. If deficiencies are identified, they are presented to the transit provider and assistance is offered to correct the inadequacies within a predetermined timeframe. FTA may also refer the matter to the U.S. Department of Justice for enforcement.

Section II

Are you filing this complaint on your own behalf?

Yes _____ No _____

(If you answered "yes" to this question, go to Section III.)

If not, please supply the name and relationship of the person for whom you are complaining:

Please explain why you have filed for a third party:



Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.

Yes _____ No _____

Section III

Have you previously filed a Title VI complaint with FTA?

Yes _____ No _____

If yes, what was your FTA Complaint Number? _____

(Note: This information is needed for administrative purposes; the same complaint number may be assigned to the new complaint.)

Have you filed this complaint with any of the following agencies?

Transit Provider: _____ Department of Transportation: _____

Department of Justice: _____ Other: _____

Equal Employment Opportunity Commission: _____

Have you filed a lawsuit regarding this complaint?

Yes _____ No _____

If yes, please provide a copy of the complaint form.

(Note: This above information is helpful for administrative tracking purposes. However, if litigation is pending regarding the same issues, parties defer to the decision of the court.)



Section IV

Name of public transit or paratransit provider complaint is against:

Contact person: _____ Title: _____

Telephone Number: _____

On separate sheets, please describe your complaint. You should include specific details such as names, dates, times, route numbers, witnesses, and any other information that would assist us in our investigation of your allegations. Please also provide any other documentation that is relevant to this complaint.

Section V

May we release a copy of your complaint to the transit/paratransit provider?

Yes _____ No _____

May we release a copy of your identity to the transit/paratransit provider?

Yes _____ No _____

Please sign here: _____ Date: _____

(Note: A signature is required for complaint acceptance.)



COMPLAINT FORM

Mr. Marvin Custodio, Title VI Administrator

OUTREACH Administration

2221 Oakland Road

San Jose, California 95131

Phone: 408-678-8585

Email: marvinc@outreach2.org

California Department of
Transportation
Civil Rights, Equal Employment
Opportunity Program
Sacramento, Ca. 95811
Phone: 1-916-324-0988
Fax: 1-916-324-8430

Federal Transit Administration
Office of Civil Rights
Attention: Complaint Team
1200 New Jersey Ave., SE
Washington, DC 20590
Phone: 1-888-446-4511

Federal Highway Administration
Washington DC Office
Civil Rights Program/Title VI
1200 New Jersey Ave., SE
8th Floor E81-105
Washington DC
Phone: 1-202-336-0693
Fax: 1-202-366-1599



Notification of Title VI Protection

Protecting Your Rights: What is Title VI?

Title VI of the Civil Rights Act of 1964 is a Federal statute that ensures that no person shall be discriminated against or denied benefits on the ground of race, color, or national origin, in programs and services that receive federal financial assistance. As such, to ensure that OUTREACH customers are not discriminated against, we have adopted policies that promote equal access and quality service to all our customers.

How Do I File a Title VI Complaint?

If you believe you have been discriminated against, you may file a signed, written complaint within one hundred and eighty (180) days of the date of alleged discrimination. The complaint should include the following information:

1. Your name, address and how to contact you (e.g. telephone number, e-mail address, etc.), and
2. How, when, where and why you believe you were discriminated against. Include the location, names and contact information of any witnesses.

The complaint may be filed in writing to OUTREACH directly at:

Marvin Custodio, Title VI Administrator
OUTREACH Administration
2221 Oakland Road
San Jose, California 95131

Phone: 408-678-8585
Email: marvinc@outreach2.org



Printable Title VI Form Title VI Complaint Procedure

E-mail: marvinc@outreach2.org

Telephone: 408-678-8585

Hearing & Speaking Impaired: Dial 711 to Reach California Relay Service

Complaint Assistance

An OUTREACH Customer Service representative will assist with writing a complaint if the complainant is unable to do so. We will accommodate any language requirement and will provide accessible formats and accommodations.

Complainants may also file a Title VI complaint with an external entity such as FTA, other federal and state agencies or federal or state court. However, should a complainant be filed with OUTREACH and an external entity simultaneously, the external complaint will supersede the OUTREACH complaint and OUTREACH complaint procedures will be suspended pending the external entity's findings.

Thank you. *Dennis Wootten* Outreach CEO
Dennis Wootten

Outreach & Escort, Inc. (OUTREACH)
2221 Oakland Road
San Jose, California 95131
408-678-8585
marvinc@outreach2.org

Location of this Notification: This notification is posted in public area of building/lobby of business location open to the public; this notification is posted on agency website; this notification is routinely included in informational materials to public/riders for services.



Outreach & Escort, Inc. (OUTREACH)

Limited English Proficiency (LEP) Plan

And ADA Accommodation

**Approved by Outreach & Escort Board of Directors _____ 2022
For FY22–FY24**

I. Introduction

This *Limited English Proficiency Plan* has been prepared to address OUTREACH's responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq, and the implementing regulations, which state that no person shall be subjected to discrimination on the basis of race, color or national origin.

Executive Order 13166 - "Improving Access to Services for Persons with Limited English Proficiency", requires that recipients of Federal financial assistance provide meaningful access to LEP applicants and beneficiaries. The Executive Order establishes that differing treatment based upon a person's inability to speak, read, write or understand English is a type of national origin discrimination. It directs each federal agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discrimination does not take place. This order applies to all State and local agencies that receive federal funds.

II. Plan Summary

OUTREACH has developed this *Limited English Proficiency Plan* to help identify reasonable steps for providing language assistance to persons with limited English proficiency (LEP) who wish to access services provided by OUTREACH. As defined in Executive Order 13166, LEP persons are: Those who do not speak English as their primary language; and have a limited ability to read, write, speak or understand-English, as a result of national origin.

This plan outlines how to identify a person who may need language assistance, the way in which assistance may be provided, staff training that may be required, and how to notify LEP persons that assistance is available.

In order to prepare this plan, OUTREACH undertook the U.S. DOT four-factor LEP analysis which considers the following factors:

1. The number or proportion of LEP persons in the service area who may be served or are likely to encounter an OUTREACH program, activity or service,
2. The frequency with which LEP persons come in contact with OUTREACH programs, activities or services,

3. The nature and importance of programs, activities or services provided by OUTREACH to LEP individuals, and
4. The resources available to OUTREACH and overall cost to provide LEP assistance.

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

III. Four-Factor Analysis

1. *The number or proportion of LEP persons in the service area who may be served or are likely to encounter an OUTREACH program, activity or service.*

The Census Bureau has a range of four classifications of how well people speak English. The classifications are “very well,” “well,” “not well,” and “not at all” as Limited English Proficient persons.

Table 1: LANGUAGE SPOKEN AT HOME FOR THE POPULATION 5 YEARS AND OVER. Language Spoken at Home by Ability to Speak English, Persons Age 5 years and Over, 2016-2020, San Francisco Bay Area, American Community Survey 2016-2020
Data for Santa Clara County

Speaks English Less than “Very Well”	2012-2016 Number	2012-2016 Percentage	2020 Number	2020 Percentage
Spanish	131,546	7.5%	118,954	6.57%
Korean	2,968	0.7%	10,719	0.59%
Chinese	15,265	3.6%	78,198	4.32%
Vietnamese	17,386	4.1%	75,218	4.15%
Tagalog	4,664	1.1%	19,062	1.05%
Other Languages	219,186	12.4%	302,151	14.7%
Total Speaking English Less than “Very Well”	391,015	22.2%	354,229	20%
Speaks English “Very Well”	1,373,357	77.8%	1,462,377	80%
TOTAL	1,764,372	100%	1,816,606	100%

Notes: Tabulation prepared by VTA staff based on data from the American Community Survey (ACS) 2016-2020.

Updated information from the 2016-2020 ACS survey is based on estimates but the ACS survey did specifically break out **the Spanish number and percentile and Spanish is the one language that exceeded the 5% threshold.**

A. The Total Population for Santa Clara County was 1,894,783, although this number may not be precise due to independent rounding. The source was the U.S. Census, State of California, Department of Finance, Demographic Research Unit. This was cited in the Santa Clara Valley Transportation Authority’s Annual Comprehensive Financial Report for the Fiscal year Ended June 30, 2022. (Page 3-18).

B. Other sources may vary such as the State of California Department of Finance with a 2020

population estimated at 1,996,394. Per the 2017 American Community Survey, 5-Year Estimates, 12% of the population in the county is 50-74 years of age, consistent with the state at 13% (Sourcewise page 29).

C. The 2019 data from the U.S. Census Bureau American Community Survey 5-Year Estimates, Table B01001; 2050 data from the MTC Plan Bay Area, reports older adults in SCC at 12% in 2019 and expected to go to 13% by 2035; same data sets reported 8% of the populations in SCC living with a disability in 2019 and for that to remain at that level by 2035 but for persons over 60 years of age that percentage was higher at 31% in 2019.

D. Per the California Department of Finance, the older adult population of 60 plus years is becoming more diverse in Santa Clara County (Area Plan on Aging, 2020-2024) between 2010 and 2020. (Marvin, pages 3 and 5 in Nelson Nygaard's "MTC Coordinated Plan TAC Third Meeting May 2, 2002, draft).).

E. Languages Spoken at Home (U.S. Census) 2021 provides additional data to the United Census Bureau, 2016-2020 American Community Survey. Table B16001: 5-year estimate based on 2015 data. As reflected in the table, the top five non-English Languages Spoken in Santa Clara County for persons over 5 years of age "who speak English less than well" are in descending order: 6.57% Spanish (118,954); 4.32% Chinese (Mandarin and Cantonese) (78,198; 4.15% Vietnamese (75,218); 1.09% Tagalog (19,062); and 0.59% Korean (10,719). (VTA Title VI page 97).

As a non-profit organization, special attention is focused on meeting the needs of older adults and persons with disabilities. Per the California Department of Finance, the older adult population of 60 plus became more diverse between 2010 and 2020 in SCC (Area Plan on Aging, 2020-2024) and Outreach will accommodate this cultural and language diversity. Per the 2019 data from the U.S. Census Bureau American Community Survey 5-Year Estimates, Table B01001; 2050 data from the MTC Plan Bay Area, older adults in SCC were reported at 12% in 2019 and expected to go to 13% by 2035; same data sets reported 8% of the populations in SCC living with a disability in 2019 and for that to remain at that level by 2035. ADA accommodations shall also be made.

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

OUTREACH assessed the frequency with which staff and drivers have, or could have, contact with LEP persons. The following “touch points” and frequencies have been identified:

PRIMARY TOUCH POINTS	FREQUENCY
Drivers	Frequently
OUTREACH Eligibility	Frequently
Rider’s Guide	Often- Frequently
Dispatchers/Schedulers	Often
Mobility Managers	Often
Website	Occasionally
Social Workers/Case Managers	Often

SECONDARY “TOUCH POINTS”	FREQUENCY
Office Staff	Occasionally
Road Supervisors	Rarely
Print Media	Occasionally

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

The largest geographic concentration of LEP individuals in the OUTREACH service area are speakers of Spanish followed by Asian languages. Community transportation and social services targeting low-income individuals, persons with disabilities, and older adults are most likely to encounter LEP individuals.

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

OUTREACH assessed available resources that could be used for providing LEP assistance, including determining: how much a professional interpreter and translation service would cost on an as-needed basis, how to access quality translation services or tools at no cost, which of documents would be the most valuable to be translated if the need should arise, and an inventory of available organizations that OUTREACH could partner with for OUTREACH’s translation efforts.

Safe Harbor Provision – The Federal Transit Administration Circular 4702.1B states: “The Safe Harbor Provision stipulates that, *if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with*

the recipient's written translation obligations. Translation of non-vital documents, if needed, can be provided orally. If there are fewer than 50 persons in a language group that reaches the five percent (5%) trigger, the recipient is not required to translate vital written materials but should provide written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost.

These safe harbor provisions apply to the translation of written documents only. They do not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable. A recipient may determine, based on the Four Factor Analysis, that even though a language group meets the threshold specified by the Safe Harbor Provision, written translation may not be an effective means to provide language assistance measures. For example, a recipient may determine that a large number of persons in that language group have low literacy skills in their native language and therefore require oral interpretation. In such cases, background documentation regarding determination shall be provided to FTA in the Title VI Program."

Based on the four-factor analysis, Spanish is the quantifiable population that are limited-English proficient. However, vital documents, including all Title VI related documents, are available not only in Spanish but also Chinese and Vietnamese.

IV. Limited English Proficiency (LEP) Plan Outline

There are five areas that comprise OUTREACH's LEP Plan:

1. Identifying LEP individuals who need language assistance
2. Language assistance measures
3. Training Staff
4. Providing Notice to LEP Plan
5. Monitoring and updating the LEP Plan

1. Identifying LEP individuals who need language assistance

How OUTREACH may identify an LEP person who needs language assistance

- Examine records for language assistance that had been received in the past, to determine what kinds of language assistance may be needed in the future.
- Examine applications that are currently in languages other than English (e.g. Spanish, and Vietnamese, etc.) to see demand and also track any requests for other language assistance to apply for agency programs and services.
- When OUTREACH sponsors an event, have a staff person greet participants as they arrive. By informally engaging participants in conversation determine if they will need language assistance to fully participate. Track such information for future events.
- Have Census Bureau *Language Identification Flashcards* available at OUTREACH events near the registration table of event, and at front desk of business office location. Individuals self-identify as persons not proficient in English may not be able to be accommodated with translation assistance at the event, but it will assist in identifying language assistance needs for future events.
- Have *Language Identifying Flashcards* on all vehicles to assist coach operators in identifying specific language assistance needs of passengers. If such individuals are encountered, vehicle operators will be instructed to record and report so OUTREACH staff can follow-up with the client.
- Mobility Management and other staff who interact with the public and clients or who deliver trips will also be instructed to maintain records of LEP individuals needing assistance in person or over the phone so that requests for language assistance can be tracked in the appropriate database.
- OUTREACH provides emergency specific *Language Identifying Assistance* flash cards in multiple languages to assist drivers to communicate with LEP riders during or after an emergency/disaster. Drivers will report back to dispatch any instances of

the use of these tools for purposes of recording and follow-up with the customer to determine any future assistance needed.

2. Language Assistance Measures

There were and will continue to be numerous language assistance measures available to LEP persons, including both oral and written language services. There are also various ways in which OUTREACH staff responded to LEP persons, whether in person, by telephone or in writing.

How OUTREACH assisted or will assist an LEP person who needs language assistance.

- OUTREACH continued and will continue to provide vital information to LEP groups on OUTREACH programs and services;
- Networked with human service organizations and internal agency programs that provide services to LEP individuals and sought opportunities to provide information on OUTREACH programs and services;
- Provided a bilingual Community OUTREACH Coordinator at community events, other public events, and meetings as needed;
- Placed statements in notices and publications that interpreter services are available for these meetings, with reasonable advance notice;
- Tracked information from front-line staff concerning any contacts with LEP persons during the previous year;
- Provided *Language Identification Flashcards* at the front desk, onboard OUTREACH vehicles and other locations as appropriate;
- Posted the OUTREACH Title VI Policy and LEP Plan on the agency website, www.outreach3.org;
- Provided group travel training to LEP persons with the assistance of bilingual staff;
- Included language “Spanish a plus” and “Bilingual a plus” on employee and volunteer recruitment materials;
- OUTREACH website has the capability for a person to select a language, click and have automatic translation services via Yahoo! Babelfish and google Translate;
- When an interpreter is needed for a language other than English in person or on the telephone, staff will attempt to access language assistance from a professional translation service or qualified community volunteers or social workers/case

managers.

- For the hearing impaired: Sign-language interpreters will be provided upon request. Video Relay Services (VRS) which is always and VRS is a form of the Telecommunications Relay Service (TRS) that enables persons with hearing disabilities to use American Sign Language (ASL) to communicate with voice telephone users through video equipment, rather than through typed text.

3. Staff Training

How OUTREACH trained staff and continues to train staff on its role and responsibilities in providing meaningful access to services for LEP persons

- Developed curriculum and corresponding PowerPoint presentations to educate OUTREACH staff on Title VI LEP requirements for providing meaningful access to services for LEP persons;
- Provided staff with a description of language assistance services offered by OUTREACH;
- Provided staff with specific procedures to be followed when encountering an LEP person, including how to handle a potential Title VI/LEP complaint;
- Instructed staff on the use of FTA *Language Identification Flashcards*;
- Instructed staff on the use of on-line translation tools via <http://translate.google.com> or <http://babelfish.yahoo.com/> with appropriate editing for accuracy by qualified persons, etc.

4. Providing Notice to LEP Persons

How OUTREACH provided and continues to provide Notice to LEP Persons, both oral and written communications;

- Offered general information, such as operation hours and services through phone system.
- Used greetings, both Spanish and English, directing callers to select which language they prefer;
- Continued to provide the Rider's Guide in English and Spanish and accessible formats

- Continued to translate vital documents and ensure they are accurate (vital documents are defined as those documents without which a person would be unable to access services)

The following are written communications printed in both English and Spanish:

- Riders Guide which contains information on fares, accessibility, and general riding information;
 - Applications for services; and
 - All Title VI and LEP materials
- Provided printed information in multiple languages about OUTREACH's non-discrimination policies and information on the local/federal complaint process, place them on the agency's website and have them available at public meetings;
 - Provided a tagline affirming OUTREACH will make reasonable accommodations to translate any materials into Spanish or provide an interpreter at public hearings and meetings;

5. **Monitoring and updating the LEP Plan**

This plan is designed to be flexible, and should be viewed as a work in progress. As such, it is important to consider whether new documents and services need to be made accessible for LEP persons, and also to monitor changes in demographics and types of services.

OUTREACH updates the LEP every three (3) years, as required by U.S. DOT.

How OUTREACH will examine and update its LEP Plan:

- Record and report how on the number of LEP persons were encountered annually through OUTREACH's compliance efforts; Determine if needs were reasonably met through OUTREACH's bilingual staff, language and translation assistance, etc.
- Determine how the needs of LEP persons have been addressed;
- Participate with external entities authorized to do transportation planning in the state, region and local level as they assess the needs and plan for current LEP population in the service area;
- Determine whether agency financial resources are sufficient to fund language assistance resources needed;

- Determine whether OUTREACH and its Contractor(s) have fully complied with the goals of this LEP Plan;
- Determine whether complaints have been received concerning the agency's failure to meet the needs of LEP individuals; and
- Obtain input from customers on a regular basis about their language needs.

IV. Dissemination of the OUTREACH LEP Plan

How the OUTREACH LEP Plan will be disseminated to customers and the community;

A link to the OUTREACH LEP Plan and the Title VI Plan will be included on the OUTREACH website: www.OUTREACH3.org

OUTREACH's LEP Plan will also be shared with human service organizations in its service area.

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

Questions or comments regarding the LEP Plan may be submitted to the OUTREACH Executive Director as follows:

Marvin Custodio, Title VI Administrator
2221 Oakland Rd. Suite #200
San Jose, CA 95131
(408) 678-8585

Appendix A: Title VI Program Limited English Proficiency (LEP) Reporting Form and ADA Accommodation Form

**Title VI Program Limited English Proficiency (LEP)
Reporting Form and ADA Accommodation Form**

Name: _____

Date: _____

Walk-In/Direct Contact: _____ Telephone: _____ In Writing: _____

In Public Setting: _____

How was the interpreter/translation services provided?

Staff: _____

Contractor Staff: _____

Volunteer: _____

Phone Interpreter Service: _____

Other: _____

Language: _____

ADA Accommodation Need: _____

ADA Format or Method: _____

Length of Time to Provide Service: _____



Outreach & Escort Inc. (OUTREACH)
Title VI Notice to the Public
POLÍTICA DE NO-DISCRIMINACIÓN DE OUTREACH

OUTREACH & Escort Inc. (OUTREACH), bajo el Título VI de la ley de derechos civiles de 1964 y estatutos relacionados, asegura que ninguna persona por motivos de raza, color o origen nacional sea excluida de participar, o sean negados beneficios o sea sujeta a discriminación en cualquier programa o actividad que se dirija.

Para más información u orientación sobre cómo presentar una queja por motivos en raza, color o origen nacional, visite la siguiente página web: <http://www.outreach3.org> o llame al teléfono (408) 678-8585.

Si usted necesita traducción y / o ayuda con otros materiales en inglés, y / o en otro formato, como por ejemplo material en método Braille, audio, impresión con letras en grande, póngase en contacto con Marvin Custodio, Administrador del Título VI, OUTREACH & Escort Inc., PO Box 640910, San Jose, California 95164. El teléfono es (408) 678-8585, o por correo electrónico: marvinc@outreach2.org

Dennis Wootten

Dennis Wootten, CEO

11/28/2022

Date

Aprobado por el Consejo Directivo de Outreach & Escort Inc. en 8/31/22.



Outreach & Escort, Inc. (OUTREACH)
TITLE VI COMPLAINT FORM

Mr. Marvin Custodio
OUTREACH Administration
2221 Oakland Road
San Jose, California 95131
Phone: 408-678-8585
Email: marvinc@outreach2.org

Sección I

Nombre: _____

Dirección: _____

Números de Teléfonos:

(Casa o Celular): _____ (Trabajo): _____

Correo Electrónico: _____

Requerimientos de formatos accesibles?

Letra Grande: ____ Cinta de Audio: ____

Discapacidad Auditiva/TDD: ____ Otro: ____

La Administración Federal de Tránsito (FTA) Oficina de Derechos Civiles es responsable del cumplimiento de los derechos civiles y

monitoreo, que incluye garantizar que los proveedores de transporte publico cumplan debidamente con el Título VI del Acta de Derechos Civiles de 1964, la Orden Ejecutiva 12898, "Acciones federales para abordar un ambiente de justicia en poblaciones minoritarias y de bajos ingresos", y el Departamento de Transporte de Orientación a los Destinatarios en servicios de idiomas a personas de Inglés limitado (LEP) Beneficiarios.

En el proceso de investigación de quejas FTA, se analiza las alegaciones del demandante por el título VI posibles deficiencias relacionadas con el proveedor de tránsito. Si se detectan deficiencias, se presentan al proveedor de tránsito y se ofrece ayuda para corregir las deficiencias en un plazo predeterminado. FTA también podrá remitir el asunto al Departamento de Justicia de EE.UU. para la ejecución.

Sección II

¿Está presentando esta queja por su propia cuenta?

Sí _____ No _____

(Si usted contestó "sí" a esta pregunta, ir a la sección III.)

Si no es así, favor de proporcionar el nombre y relación de la persona por quien usted se está quejando:

Por favor explique por qué usted ha presentado por un tercero:

Por favor, confirme que ha obtenido el permiso de la parte agraviada, si usted está presentando en nombre de un tercero.

Sí _____ No _____

Sección III

¿Ha presentado anteriormente una queja del Título VI con FTA?

Sí _____ No _____

En caso afirmativo, ¿cuál fue su número de queja con FTA? _____
(Nota: Esta información es necesaria con fines administrativos; el mismo número de queja puede ser asignado a la nueva queja.)

¿Ha presentado esta queja ante cualquiera de las siguientes agencias?

Transit Provider: _____ Departamento de Transporte: _____

Departamento de Justicia: _____ Otro: _____
Equal Employment Opportunity Commission: _____

¿Ha presentado una demanda con respecto a esta queja?

Sí _____ No _____

En caso afirmativo, por favor proporcione una copia del formulario de queja.

(Nota: Esta información es útil con fines de seguimiento administrativo. Sin embargo, si el litigio en relación con los mismos problemas está pendiente, las partes aplazarán la decisión de la corte.)

Sección IV

Nombre de Tránsito público o proveedor de paratransito que está en contra de:

Persona a contactar: _____ Título: _____

Numero de teléfono : _____

En hojas por separado, por favor describa su queja. Usted puede incluir detalles específicos, tales como nombres, fechas, horas, números de ruta, testigos y cualquier otra información que nos ayude en nuestra investigación de sus denuncias. Sirvase también proporcionar cualquier otra documentación que sea relevante para la presente queja.

Sección V

Podemos proporcionar una copia de su queja al proveedor de tránsito/paratránsito?

Sí _____ No _____

Podemos proporcionar una copia de su identidad al proveedor de tránsito/paratránsito?

Sí _____ No _____

Por favor firme aquí: _____ Fecha: _____

(Note: Se requiere una firma para la aceptación de la queja.)

FORMULARIO DE QUEJA

Mr. Marvin Custodio
OUTREACH Administration
2221 Oakland Road
San Jose, California 95131
Phone: 408-678-8585
Email: marvinc@outreach2.org

Caltrans Department of
Transportation
Civil Rights, Equal Employment
Opportunity Program
700 N. 10th Street, Suite
102B
Sacramento, California
95814
Phone: 916- 324-9461

Federal Transit Administration
Office of Civil Rights
Attention: Complaint Team
1200 New Jersey Ave., SE
Washington, DC 20590
Phone: 1-888-446-4511

Federal Highway
Administration
Washington DC
Office of
Civil Rights Program/Title VI
1200 New Jersey Ave., SE
8th floor E81-105
Washington DC 20590
Phone: 1-202-336-0693
Fax: 1-202-366-1599



TITLE VI PROGRAM

Updated November 2022

Board Approved 11/28/ 2022

Outreach & Escort, Inc.

2221 Oakland Road

San Jose, California 95131

1-408-678-8585

Index

1. Notice of Title VI Protections to the public including list of locations where notice is posted
2. Title VI Complaint Procedures, How to file a Complaint and Complaint Form
3. Title VI Tracking Form – List of any public transportation Title VI investigations, complaints or lawsuits filed since last submission (none to report)
4. Title VI Public Participation Plan – Promoting Inclusive Public Participation
5. Limited English Proficiency (LEP) Plan
6. Table depicting racial breakdown of transit-related, non-elected planning boards, advisory councils or committees (Outreach is a non-profit; racial breakdown provided)
7. No facility has been constructed so no Title VI equity analysis needed – Not applicable
8. Sub-recipient not a fixed route provider or public agency – Not applicable
9. Outreach Non-profit Board Approval Action for Title VI Program

1. Notification of Title VI Protections



Notification of Title VI Protection

Protecting Your Rights: What is Title VI?

Title VI of the Civil Rights Act of 1964 is a Federal statute that ensures that no person shall be discriminated against or denied benefits on the ground of race, color, or national origin, in programs and services that receive federal financial assistance. As such, to ensure that OUTREACH customers are not discriminated against, we have adopted policies that promote equal access and quality service to all our customers.

How Do I File a Title VI Complaint?

If you believe you have been discriminated against, you may file a signed, written complaint within one hundred and eighty (180) days of the date of alleged discrimination. The complaint should include the following information:

1. Your name, address and how to contact you (e.g. telephone number, e-mail address, etc.), and
2. How, when, where and why you believe you were discriminated against. Include the location, names and contact information of any witnesses.

The complaint may be filed in writing to OUTREACH directly at:

Marvin Custodio, Title VI Administrator
OUTREACH Administration
2221 Oakland Road
San Jose, California 95131

Phone: 408-678-8585
Email: marvinc@outreach2.org



Printable Title VI Form Title VI Complaint Procedure

E-mail: marvinc@outreach2.org

Telephone: 408-678-8585

Hearing & Speaking Impaired: Dial 711 to Reach California Relay Service

Complaint Assistance

An OUTREACH Customer Service representative will assist with writing a complaint if the complainant is unable to do so. We will accommodate any language requirement and will provide accessible formats and accommodations.

Complainants may also file a Title VI complaint with an external entity such as FTA, other federal and state agencies or federal or state court. However, should a complainant be filed with OUTREACH and an external entity simultaneously, the external complaint will supersede the OUTREACH complaint and OUTREACH complaint procedures will be suspended pending the external entity's findings.

Thank you.  Outreach CEO
Dennis Wooten

Outreach & Escort, Inc. (OUTREACH)
2221 Oakland Road
San Jose, California 95131
408-678-8585
marvinc@outreach2.org

Location of this Notification: This notification is posted in public area of building/lobby of business location open to the public; this notification is posted on agency website; this notification is routinely included in informational materials to public/riders for services.



List of Locations Where Title VI Notice Is Posted

Outreach & Escort, Inc. notice to the public is currently posted at the following locations:

Location Name	Address	City
Public Lobby	2221 Oakland Rd.	San Jose
Main Shared Office Space	2221 Oakland Rd.	San Jose
Agency Vehicle #160	2221 Oakland Rd.	San Jose
Agency Vehicle #170	2221 Oakland Rd.	San Jose

Title VI notice and program information is also provided on OUTREACH's website at <http://www.outreach3.org>.

You may wish to send a request for a copy of our public notification and Title VI program information by contacting marvinc@outreach2.org.



Outreach & Escort Inc. (OUTREACH)
Title VI Notice to the Public
POLÍTICA DE NO-DISCRIMINACIÓN DE OUTREACH

OUTREACH & Escort Inc. (OUTREACH), bajo el Título VI de la ley de derechos civiles de 1964 y estatutos relacionados, asegura que ninguna persona por motivos de raza, color o origen nacional sea excluida de participar, o sean negados beneficios o sea sujeta a discriminación en cualquier programa o actividad que se dirija.

Para más información u orientación sobre cómo presentar una queja por motivos en raza, color o origen nacional, visite la siguiente página web: <http://www.outreach3.org> o llame al teléfono (408) 678-8585.

Si usted necesita traducción y / o ayuda con otros materiales en inglés, y / o en otro formato, como por ejemplo material en método Braille, audio, impresión con letras en grande, póngase en contacto con Marvin Custodio, Administrador del Título VI, OUTREACH & Escort Inc., PO Box 640910, San Jose, California 95164. El teléfono es (408) 678-8585, o por correo electrónico: marvinc@outreach2.org

Dennis Wootten

Dennis Wootten, CEO

11/28/2022

Date

Aprobado por el Consejo Directivo de Outreach & Escort Inc. en 8/31/22.



If information is needed in Chinese, please
contact: (408)678-8585

如果需要中文本的信息，请致电：(408)678-8585

If information is needed in Spanish, please
contact: (408)678-8585

Si necesita información en español, por favor
de contactar: (408)678-8585

If information is needed in Vietnamese, please
contact: (408)678-8585

Nếu cần chi tiết bằng tiếng Việt, xin vui lòng liên
lạc: (408)678-8585



NOTIFICATIONS

Copies of these
notifications* may be
obtained from an Office
Staff

Or

By visiting OUTREACH's
website at

www.outreach3.org

*Alternate formats are
available upon request

2. Title VI Complaint Procedures, How to file a Complaint and Complaint Form.



**Title VI Complaint Procedure
How to File a Complaint
And Complaint Form**

Tracking and Investigating Process

It is the policy of OUTREACH to employ its best efforts to ensure that all programs, services, activities and benefits are implemented without discrimination. OUTREACH follows complaint investigation and format procedures which are in keeping with Title VI requirements. The following is the OUTREACH procedure for tracking and investigating complaints alleging discrimination on the basis of race, color or national origin.

Any person who believes that he or she, individually or as a member of any specific class of persons, has been subjected to discrimination on the basis of race, color, or national origin may file a written complaint with OUTREACH, the Federal Transit Administration (FTA) or the Secretary of Transportation. Further, OUTREACH prohibits intimidation, coercion or engagement in other discriminatory conduct against anyone because he or she has filed a complaint to secure rights protected by Title VI.

A signed complaint must be filed within 180 days after the date of the alleged discrimination, unless the time for filing is extended by the Secretary of Transportation. OUTREACH encourages complaints to be initially filed with OUTREACH for resolution. However, in those cases where the complainant is dissatisfied with the resolution by OUTREACH, the same complaint may be submitted to the FTA or the Secretary of Transportation for investigation. Unless otherwise permitted, the final determination of all the Title VI complaints affecting programs administered by the FTA will be made by the Office of the Secretary, Department of Transportation (DOT).

Complainants may submit signed written complaints to OUTREACH and/or directly to the FTA offices identified below:

Mr. Marvin Custodio, Title VI Administrator

OUTREACH Administration

2221 Oakland Road

San Jose, California 95131

Phone: 408-678-8585

Email: marvinc@outreach2.org

Caltrans Headquarters

California Department of

Transportation

Civil Rights, Equal Employment

Opportunity Program

Sacramento, Ca. 95811

Phone: 1-916-324-0988

Fax: 1-916-324-8430

Federal Transit Administration

Office of Civil Rights

Title VI Program

1200 New Jersey Avenue, SE

Washington, DC 20590

Phone: 1-888-446-4511

Federal Highway Administration

Washington DC Office

Civil Rights Program/Title VI

1200 New Jersey Ave., SE

8th Floor E81-105

Washington DC

Phone: 1-202-336-0693

Fax: 1-202-366-1599

In cases where the complainant is unable or incapable of providing a written statement but wishes OUTREACH or the FTA to investigate alleged discrimination, a verbal complaint of discrimination may be made. The complainant will be interviewed by an appropriate official authorized to

receive complaints. If necessary, the official will assist the complainant in converting the verbal complaint to writing. Translation services will be provided to all complainants, as necessary. All complaints must, however, be signed by the complainant or his/her representative.

Information for filing a Title VI complaint can be accessed on the OUTREACH website at www.outreach3.org or by contacting:

OUTREACH Administration - Mr. Marvin Custodio at 408-678-8585

E-mail inquiries or initial complaints can be sent directly to OUTREACH Administration at marvinc@outreach2.org.

English, Spanish, Vietnamese and Chinese language Title VI protection notification information is available in printed form at OUTREACH business office location (posted in multiple locations open to the public). Multi-lingual translation services are available by calling: 408-678-8585.

Complaint Format

1. All complaints must be in writing and signed by the complainant or his/her representative before action can be taken. Complaints shall state, as fully as possible, the facts and circumstances surrounding the alleged discrimination.
2. OUTREACH will provide the complainant or his/her representative with a written acknowledgement that OUTREACH has received the complaint within ten working days.
3. The following complaint information will be tracked by the Office of Civil Rights on the OUTREACH Title VI Complaint/Investigation log:
 - a. Date the complaint was received by OUTREACH
 - b. Date an acknowledgement letter was sent to the complainant
 - c. Entity
 - d. Protected category
 - e. Program/Activity/Service
 - f. Summary of the allegation
 - g. Status of the complaint
 - h. Was the complaint investigated? Yes or No.
 - i. Action taken
 - j. The response letter was sent to the complainant Action taken

Determination of Investigative Merit

OUTREACH will begin an investigation within fifteen (15) working days of receipt of a valid complaint. A complaint shall be regarded as meriting investigation unless:

1. It clearly appears on its face to be frivolous or trivial.
2. When the time allotted for making the determination of jurisdiction and investigative merit, the party complained against voluntarily concedes noncompliance and agrees to take appropriate remedial action.
3. Within the time allotted for making the determination of jurisdiction and investigative merit, the complainant withdraws the complaint; or
4. Other good cause for not investigation the complaint exists (e.g. respondent is presently under investigation by another Federal

agency.)

Request for Additional Information from Complainant and/or Respondent

In the event that the complainant or respondent has not submitted sufficient information to make a determination of jurisdiction or investigative merit, OUTREACH may request additional information from either party. This request shall be made within 15 working days of the receipt of the complaint and will require that the party submit the information within 60 working days from the date of the original request. Failure of the complainant to submit additional information within the designated time may be considered good cause for a determination of no investigative merit. Failure of respondent to submit additional information within the designated time frame may be considered good cause for a determination of noncompliance.

Investigative Report

OUTREACH will complete an investigation within ninety (90) days of receipt of the complaint. If additional time for the investigation is needed, the complainant will be contacted. A written report will be prepared by the responsible investigator at the conclusion of the investigation. The investigative report will include the following:

1. Summary of the complaint, including a statement of the issues raised by the complainant and the respondent's reply to each of the allegations, citations of relevant Federal, State, and Local laws, rules, regulations and guidelines, etc.
2. Description of the investigation, including a list of the persons contracted by the investigator and a summary of the interviews conducted; and a statement of the investigator's findings and recommendations. A closing letter will be provided to the complainant.



Outreach & Escort, Inc. (OUTREACH)
TITLE VI COMPLAINT FORM

Mr. Marvin Custodio, Title VI Administrator
OUTREACH Administration
2221 Oakland Road
San Jose, California 95131
Phone: 408-678-8585
Email: marvinc@outreach2.org

Section I

Name: _____

Address: _____

Telephone Numbers:

(Home or Cell) _____ (Work) _____

Email Address _____

Accessible Format Requirements?

Large Print: _____ Audio tape: _____

TDD: _____ Other: _____

The Federal Transit Administration (FTA) Office of Civil Rights is responsible for civil rights compliance and monitoring, which includes ensuring that providers of public transportation properly abide by Title VI of the Civil Rights Act of 1964, Executive Order 12898, "Federal Actions To Address Environmental Justice in Minority Populations and Low Income Populations," and the Department of Transportation's Guidance to



Recipients on Special Language Services to limited English Proficient (LEP) Beneficiaries.

In the FTA compliant investigation process, we analyze the complainant's allegations for possible Title VI and related deficiencies by the transit provider. If deficiencies are identified, they are presented to the transit provider and assistance is offered to correct the inadequacies within a predetermined timeframe. FTA may also refer the matter to the U.S. Department of Justice for enforcement.

Section II

Are you filing this complaint on your own behalf?

Yes _____ No _____

(If you answered "yes" to this question, go to Section III.)

If not, please supply the name and relationship of the person for whom you are complaining:

Please explain why you have filed for a third party:



Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.

Yes _____ No _____

Section III

Have you previously filed a Title VI complaint with FTA?

Yes _____ No _____

If yes, what was your FTA Complaint Number? _____

(Note: This information is needed for administrative purposes; the same complaint number may be assigned to the new complaint.)

Have you filed this complaint with any of the following agencies?

Transit Provider: _____ Department of Transportation: _____

Department of Justice: _____ Other: _____

Equal Employment Opportunity Commission: _____

Have you filed a lawsuit regarding this complaint?

Yes _____ No _____

If yes, please provide a copy of the complaint form.

(Note: This above information is helpful for administrative tracking purposes. However, if litigation is pending regarding the same issues, parties defer to the decision of the court.)



Section IV

Name of public transit or paratransit provider complaint is against:

Contact person: _____ Title: _____

Telephone Number: _____

On separate sheets, please describe your complaint. You should include specific details such as names, dates, times, route numbers, witnesses, and any other information that would assist us in our investigation of your allegations. Please also provide any other documentation that is relevant to this complaint.

Section V

May we release a copy of your complaint to the transit/paratransit provider?

Yes _____ No _____

May we release a copy of your identity to the transit/paratransit provider?

Yes _____ No _____

Please sign here: _____ Date: _____

(Note: A signature is required for complaint acceptance.)



COMPLAINT FORM

Mr. Marvin Custodio, Title VI Administrator

OUTREACH Administration

2221 Oakland Road

San Jose, California 95131

Phone: 408-678-8585

Email: marvinc@outreach2.org

California Department of
Transportation
Civil Rights, Equal Employment
Opportunity Program
Sacramento, Ca. 95811
Phone: 1-916-324-0988
Fax: 1-916-324-8430

Federal Transit Administration
Office of Civil Rights
Attention: Complaint Team
1200 New Jersey Ave., SE
Washington, DC 20590
Phone: 1-888-446-4511

Federal Highway Administration
Washington DC Office
Civil Rights Program/Title VI
1200 New Jersey Ave., SE
8th Floor E81-105
Washington DC
Phone: 1-202-336-0693
Fax: 1-202-366-1599



Politica y Procedimiento Seguimiento e Investigacion de quejas bajo el Titulo VI

Es la política de OUTREACH utilizar sus mejores esfuerzos para asegurar que todos los programas, servicios, actividades y beneficios se implementen sin discriminación. OUTREACH sigue los procedimientos de investigación y el formato de quejas de acuerdo a los requisitos del Título VI. Lo siguiente es el procedimiento de OUTREACH para el seguimiento y la investigación de las denuncias que alegan discriminación por motivos de raza, color u origen nacional.

Cualquier persona que cree que él o ella, de forma individual o como miembro de un grupo específico de personas, ha sido objeto de discriminación por motivos de raza, color, u origen nacional puede presentar una queja con OUTREACH, la Administración Federal de Tránsito (FTA) o la Secretaría del Departamento de Transporte. Además, OUTREACH prohíbe la intimidación, la coacción o la participación en cualquier otra conducta discriminatoria contra cualquier persona porque él o ella ha presentado una demanda para garantizar los derechos protegidos por el Título VI.

Una queja firmada debe ser presentada dentro de los 180 días después de la fecha de la presunta discriminación, a menos que el plazo de la presentación sea extendida por la Secretaría del Departamento de Transporte. OUTREACH exhorta a que las quejas sean inicialmente presentadas a OUTREACH para su resolución. Sin embargo, en casos en que el denunciante no esté satisfecho con la resolución dada por OUTREACH, la misma queja podrá ser presentada a la Administración Federal de Tránsito (FTA) o la Secretaría de Transporte para su investigación. A menos que se permita lo contrario, la determinación final de todas las quejas del Título VI que afecten los programas administrados por FTA serán hechas por la Oficina de la Secretaría del Departamento de Transporte (DOT). El denunciante podrá remitir las quejas por escrito y firmadas a OUTREACH directamente o a las oficinas de FTA como se indica a continuación:

OUTREACH Administration

Mr. Marvin Custodio

2221 Oakland Road

San Jose, California 95131

Phone: 1-408-678-8585

Email: marvinc@outreach2.org

Caltrans Department of Transportation

Civil Rights, Equal Employment
Opportunity Program

700 N. 10th Street, Suite 102B

Sacramento, California 95814

Phone: 916- 324-9461

Federal Transit Administration Office of Civil Rights

Attention: Complaint Team

1200 New Jersey Ave., SE

Washington, DC 20590

Phone: 1-888-446-4511

Federal Highway Administration

Washington DC Office of

Civil Rights Program/Title VI

1200 New Jersey Ave., SE

8th floor E81-105

Washington DC 20590

Phone: 1-202-336-0693

Fax: 1-202-366-1599



En los casos en que el denunciante no esté en condiciones de proporcionar una declaración por escrito, pero desea que OUTREACH o FTA investigue el presunto caso de discriminación, se puede hacer una queja verbal de la discriminación. El denunciante será entrevistado por un funcionario apropiado autorizado para recibir quejas. Si es necesario, el funcionario ayudará al denunciante en la conversión de la queja verbal a la escrita. Los servicios de traducción serán proporcionados a todos los denunciantes como sea necesario. Todas las quejas deben ser firmadas por el denunciante o su representante.

La información para presentar una queja del Título VI se encuentra en el sitio web de OUTREACH en www.outreach3.org o puede ponerse en contacto con: La Administración OUTREACH - Sr. Marvin Custodio at 408-678-8585.

Las quejas por correo electrónico o quejas iniciales pueden ser enviadas directamente a la administración de OUTREACH al admin@outreach2.org.

La información de notificación de protección del Título VI en inglés, español, vietnamés y chino se encuentra disponible en forma impresa en las oficinas de OUTREACH (publicada en múltiple oficinas abiertas al público). Los servicios de traducción para diferentes idiomas se encuentran disponibles llamando al: 408-678-8585.

Mr. Dennis Wootten, CEO



Aprobado por la Junta Directiva de Outreach & Escort el _____.

Formato de quejas bajo el Título VI

1. Todas las quejas deben ser por escrito y firmadas por el denunciante o su representante antes de que se tome acción. Las quejas deberán indicar, en todo lo posible, los hechos y las circunstancias que rodean la presunta discriminación.
2. OUTREACH proporcionará al demandante o su representante / con un acuse de recibo por escrito que OUTREACH ha recibido la queja dentro de un periodo de diez (10) días hábiles.
3. A la siguiente información de la queja se le dará seguimiento por la Oficina de Derechos Civiles en el registro de quejas /investigaciones de OUTREACH Título VI:
 - a. Fecha en que la queja fue recibida por OUTREACH
 - b. Fecha y acuse de recibo fue enviado al denunciante
 - c. Entidad
 - d. Categoría protegida
 - e. Programa/Actividad/Servicio
 - f. Resumen de alegaciones
 - g. Situación actual de la queja
 - h. Se investigó la queja? Sí o No.
 - i. Medidas Adoptadas
 - j. La carta de respuesta fue enviada con la acción tomada al denunciante

Determinación del Mérito Investigativo

OUTREACH iniciará una investigación dentro de quince (15) días hábiles después de haber recibido la queja. Una queja será considerada digna de investigación aménos que:

1. Aparenta claramente a primera vista de ser frívola o trivial.



2. Cuando el tiempo asignado para hacer la determinación de la jurisdicción y el mérito investigativo, la parte demandada reconoce voluntariamente incumplimiento y se compromete a tomar las medidas correctivas apropiadas.
3. Dentro del plazo concedido para efectuar la determinación de la jurisdicción, el denunciante retira la queja, o
4. Existe otra buena causa para no investigar la queja (por ejemplo el demandado está siendo investigando por otra agencia federal.)

Solicitud de información adicional del denunciante y/o demandado En el caso de que el denunciante y/o el demandado no ha presentado suficiente información para hacer una determinación de la jurisdicción o el mérito de investigación, OUTREACH podría solicitar información adicional a cualquiera de las partes. Esta solicitud deberá hacerse dentro de 15 días hábiles apartir de la recepción de la queja y requerirá que la parte que presente la información dentro de los 60 días hábiles apartir de la fecha de solicitud inicial.

En caso que el demandante falle en presentar información adicional dentro del plazo estipulado se puede considerer como una buena causa para determinarse sin mérito investigativo. En caso que el demandado falle en presentar información adicional dentro del plazo estipulado, se podría considerar una buena causa para una determinación de incumplimiento.

Informe de Investigación

OUTREACH concluirá una investigación dentro de los noventa (90) días siguientes a la recepción de la queja. Si se necesita más tiempo para la investigación, se le comunicara al denunciante. Se preparara un informe por escrito por el investigador responsable en la conclusión de la investigación. El informe de investigación incluirá lo siguiente:

1. Resumen de la queja, incluyendo una declaración de las cuestiones planteadas por el denunciante y la respuesta del demandado a cada una de las denuncias, citaciones de relevancia Federales, estatales, y las leyes locales, normas y lineamientos, etc.
2. Descripción de la investigación, incluyendo una lista de las personas contratadas por el investigador y un resumen de las entrevistas realizadas; Y una declaración de las conclusiones y recomendaciones. Una carta de conclusión de la investigación se le proporcionara al demandante.



Outreach & Escort, Inc. (OUTREACH)
TITLE VI COMPLAINT FORM

Mr. Marvin Custodio
OUTREACH Administration
2221 Oakland Road
San Jose, California 95131
Phone: 408-678-8585
Email: marvinc@outreach2.org

Sección I

Nombre: _____

Dirección: _____

Números de Teléfonos:

(Casa o Celular): _____ (Trabajo): _____

Correo Electrónico: _____

Requerimientos de formatos accesibles?

Letra Grande: ____ Cinta de Audio: ____

Discapacidad Auditiva/TDD: ____ Otro: ____

La Administración Federal de Tránsito (FTA) Oficina de Derechos Civiles es responsable del cumplimiento de los derechos civiles y

monitoreo, que incluye garantizar que los proveedores de transporte público cumplan debidamente con el Título VI del Acta de Derechos Civiles de 1964, la Orden Ejecutiva 12898, "Acciones federales para abordar un ambiente de justicia en poblaciones minoritarias y de bajos ingresos", y el Departamento de Transporte de Orientación a los Destinatarios en servicios de idiomas a personas de Inglés limitado (LEP) Beneficiarios.

En el proceso de investigación de quejas FTA, se analiza las alegaciones del demandante por el título VI posibles deficiencias relacionadas con el proveedor de tránsito. Si se detectan deficiencias, se presentan al proveedor de tránsito y se ofrece ayuda para corregir las deficiencias en un plazo predeterminado. FTA también podrá remitir el asunto al Departamento de Justicia de EE.UU. para la ejecución.

Sección II

¿Está presentando esta queja por su propia cuenta?

Sí _____ No _____

(Si usted contestó "sí" a esta pregunta, ir a la sección III.)

Si no es así, favor de proporcionar el nombre y relación de la persona por quien usted se está quejando:

Por favor explique por qué usted ha presentado por un tercero:

Por favor, confirme que ha obtenido el permiso de la parte agraviada, si usted está presentando en nombre de un tercero.

Sí _____ No _____

Sección III

¿Ha presentado anteriormente una queja del Título VI con FTA?

Sí _____ No _____

En caso afirmativo, ¿cuál fue su número de queja con FTA? _____
(Nota: Esta información es necesaria con fines administrativos; el mismo numero de queja puede ser asignado a la nueva queja.)

¿Ha presentado esta queja ante cualquiera de las siguientes agencias?

Transit Provider: _____ Departamento de Transporte: _____

Departamento de Justicia: _____ Otro: _____
Equal Employment Opportunity Commission: _____

¿Ha presentado una demanda con respect a esta queja?

Sí _____ No _____

En caso afirmativo, por favor proporcione una copia del formulario de queja.

(Nota: Esta información en útil con fines de seguimiento administrativo. Sin embargo, si el litigio en relacion con los mismos problemas esta pendiente, las partes aplazaran la decisión de la corte.)

Sección IV

Nombre de Tránsito public o proveedor de paratransito que esta en contra de:

Persona a contactar: _____ Título: _____

Numero de teléfono : _____

En hojas por separado, por favor describa su queja. Usted puede incluir detalles específicos, tales como nombres, fechas, horas, numeros de ruta, testigos y cualquier otra información que nos ayude en nuestra investigación de sus denuncias. Sirvase también proporcionar cualquier otra documentación que sea relevante para la presente queja.

Sección V

Podemos proporcionar una copia de su queja al proveedor de tránsito/paratransito?

Sí _____ No _____

Podemos proporcionar una copia de su identidad al proveedor de tránsito/paratransito?

Sí _____ No _____

Por favor firme aquí: _____ Fecha: _____

(Note: Se requiere una firma para la aceptación de la queja.)

FORMULARIO DE QUEJA

Mr. Marvin Custodio
OUTREACH Administration
2221 Oakland Road
San Jose, California 95131
Phone: 408-678-8585
Email: marvinc@outreach2.org

Caltrans Department of
Transportation
Civil Rights, Equal Employment
Opportunity Program
700 N. 10th Street, Suite
102B
Sacramento, California
95814
Phone: 916- 324-9461

Federal Transit Administration
Office of Civil Rights
Attention: Complaint Team
1200 New Jersey Ave., SE
Washington, DC 20590
Phone: 1-888-446-4511

Federal Highway
Administration
Washington DC
Office of
Civil Rights Program/Title VI
1200 New Jersey Ave., SE
8th floor E81-105
Washington DC 20590
Phone: 1-202-336-0693
Fax: 1-202-366-1599

#3. Title VI Tracking Form – List of any public Transportation Title VI investigations, complaints or lawsuits filed since last submission
(none to report)

Outreach & Escort, Inc. Title VI Tracking Form

Title VI Tracking Report						
Date Submitted	Tracking Number	Description of Concern	Submitted By Employee (E) Constituent (C) Vendor (V) Stakeholder (S) Other (O)	Current Status: R – Resolved UI – Under Investigation D – Dismissed W – Withdrawn P – Pending/ No Action	Actions Taken	
					Date	Comments

41

#4. Title VI Public Participation Plan – Promoting Inclusive Public Participation



Outreach & Escort, Inc. Title VI Public Participation Plan

I. Background

In accordance with Title VI of the Civil Rights Act of 1964, Executive Orders 12898 and 13166 and Federal Transit Administration (FTA) Circular 4702.1B, Outreach & Escort, Inc. (AKA Outreach) has developed this Public Participation Plan (PPP) to guide public involvement efforts and improve the ability of public involvement in Outreach Programs' decision making process by low-income, minority and Limited English Proficiency (LEP) communities.

Purpose

Outreach's primary goal in developing this program is to ensure that all individuals who rely upon Outreach services either as direct customers, family members, care assistants, care center or hospital staff, etc. are able to have a voice in the decision making for services and programs. It is also a goal of Outreach to ensure that individuals and communities who may have historically had difficulty participating in public decision-making are able to participate in future decision-making, including low-income, minority and Limited English Proficiency (LEP) communities.

To this end, Outreach does not duplicate or replicate the Title VI participation efforts and plans of public agencies in the region. In contrast, Outreach participates, contributes, and whenever possible helps to a) inform vulnerable populations of the ability to participate, voice their opinions, and help craft decisions for desired outcomes at public agencies; and b) Outreach often transports or provides free mobility options to reduce barriers to attending such public meetings.

Outreach also offers and participates in various meetings and community



outreach with the hope of empowering low income, minority, and LEP communities throughout our service area in playing an active role in Outreach's planning process.

FTA Circular 4702.1B states that with respect to planning public involvement measures:

The content and considerations of Title VI, the Executive Order on LEP, established public participation plan or process (i.e., the document that explicitly describes the proactive strategies, procedures, and desired outcomes that underpin the recipient public participation activities).

Outreach, as a 501(c)3 non-profit, is generally a sub-recipient of funding). Sub-recipients have latitude to determine how, when, and how often specific public participation activities should take place, and which specific measures are most appropriate.

Sub-recipients of Federal funding should make determinations based on the type of public involvement process planned by the sub-recipient and the resources available to a non-profit agency. Efforts to involve minority and low-income people in public involvement activities can include both comprehensive measures, such as placing public notices at community centers and in vehicles and measures to overcome linguistic, institutional, cultural, economic, historical, or other barriers that may prevent minority and low-income people and populations from effectively participating in - making process (FTA C 4702.1B, p IV-5).

The Public Participation Plan describes the overall goals, guiding principles and methods that Outreach uses regularly to reach out to low-income, minority and LEP communities. Outreach stays informed about public agency opportunities for public input and works with our customers and the other agencies that serve vulnerable populations to facilitate participation and involvement in the identification of social, economic and environmental impacts of proposed transportation decisions at recipient/grantee



organizations such as governmental bodies. Concurrently, Outreach interacts with our customers, care-givers, and the service entities to provide early and continuous input on current as well as future services offered by Outreach as a sub-recipient agency.

Ways to do this include group, small-group and individual one-on-one meetings aimed at accommodating minority and LEP communities, coordinating closely with community- and faith based organizations, educational institutions, and other organizations in conducting outreach targeted at minority and LEP communities; the consideration of effective strategy using various culturally and linguistically appropriate sources who are part of the LEP populations; utilizing other means of communication other than writing, including the use of audio or video recording, translations, and ADA accommodations; and using volunteers from various ethnic minority and LEP communities to inform their peers in the community by phone and in-person. Most important, since our War on Poverty days in the 1970s, Outreach has always had social workers, case managers, and more recently mobility managers who are well trained in effective outreach, information and referral, information and assistance, and who can engage LEP communities as they are multi-cultural and multi-lingual professionals.

This Public Participation Plan is a tailored plan that describes how Outreach will undertake public involvement, information, education, participation and/or outreach activities.

Historical Context

Outreach is a local non-profit entity that has had a history of functioning as a CTSA for Santa Clara County and as a Mobility Management Center. Outreach began as a "War on Poverty" organization and continues to provide coordinated services to persons with disabilities, seniors, veterans, low-income individuals, and other vulnerable populations.



Since the last Title VI Plan, Outreach provided ADA Paratransit services through November 2016. Outreach is a local brand name and continues to get many calls for paratransit services. Outreach supports VTA's new program by taking calls from the public and doing I&R (information and referral) and I&A (information and assistance) to connect the public to VTA's current paratransit program.

Since the last Title VI Plan, Outreach provided increased access to services having applied for and become the sub-recipient of a VTCLI (Veterans Transportation and Community Living Grant). The purpose was to connect Veterans not only to transportation and mobility resources but to health and human resources as well. Outreach's "One Call & One-Click" center will continue to be updated to remain current with resources that serve not only Veterans, but LED populations, seniors, economically disadvantaged, persons with disabilities among others.

On a day to day basis, the work that O&E performs is on a very "human scale", as each rider interactively arranges their reservation for transport and the vehicles Outreach utilize carry a small number of passengers. This one-on-one "human scale" and person-centered approach, enables the customers/the public have an opportunity to communicate with and influence changes and improvements made to the service, as well as voice any of their concerns. Outreach adheres to a "person-centered" and "rider-choice" approach one-on-one with the public.

II. Outreach Services Public Involvement Opportunities

Outreach provides/participates in a variety of committees that are designed to take comments from the public, from community organizations, faith-based groups, and customers. Committee meetings are held at locations that are accessible for individuals with disabilities and in locations that are accessible to public transit routes (as well as easily accessible by Outreach's own services). Furthermore, every effort is made for meetings to be held at convenient times to the maximum extent practicable.



Outreach attended and participated in fewer face to face activities with other agencies, nonprofits and public groups due to the Covid pandemic. Like others, Outreach participated in zoom meetings and other strategies to stay connected.

Outreach regularly goes to where our target population lives such as low-income housing for diverse and disabused seniors. During the pandemic, strategies needed to change but contacts by phone continued

Outreach has a history of serving Veterans with mobility options and reaches out to this population through various contact strategies.

Outreach participates with MTC's Coordinated Plan update process and communicates internally, with local non-profits, faith-based groups, service groups, and advocacy groups.

Outreach participated in meetings as feasible to better serve populations/LED/low-income/ethnic minorities/seniors/persons with disabilities/individuals living in communities of concern who have challenges accessing healthy food and wellness services.

Outreach makes one-on-one travel arrangements for customers when paratransit or transit are not an option; and/or if advocacy is best done outside of the local area and transportation for attending key meetings in the region or Sacramento is desired.

Outreach provides presentations throughout the community and at a variety of locations to inform members of the public of mobility options, including but not limited to walking programs Outreach hosts, volunteer driver programs Outreach offers, access to bus passes for low-income persons across ethnic, cultural and linguistic groups, demand responsive services, among other resources. At such presentations, one-on-one follow-up with individuals is offered.



III. Methods of Notifying Customers of Upcoming Meetings, Services and Resources

Outreach utilizes a variety of methods to reach out to the community to both inform the community as to the work that Outreach is doing and also to inform Outreach customers about changes that may come to the service that they rely upon and to attend meetings sponsored by local public agencies, Outreach, or other entities serving vulnerable populations.

Phone Announcements

Recordings on call center phone system inform individuals of coming meetings, service changes, and other opportunities to participate and influence services. Callers can reach a live call agent/mobility manager for additional information and options. In FY 20-21, outreach engaged in 23,204 call specific to mobility options and 20% of the calls were in Spanish and 10% in Vietnamese.

Websites

Outreach's website is a helpful tool and source of information for its customers. Dates, times and locations of upcoming meetings are all posted on the front page of the website, including any important notifications such as a fare change. In addition, there is a plethora of information to be found on the website, including rider guides, applications for services, and links to resources including our One Call & One-Click web site, and all websites can be viewed and/or translated into language of choice using Google translate already built into the site.

In-vehicle Flyers & Mail-Outs

Inserting flyers in Outreach vehicles is a method for announcing upcoming meetings to the customers. Information is available in accessible formats and in multiple languages and translations available. Flyers are also enclosed in correspondence to program participants, care-givers, family



members and service organizations about meetings, changes in services, and ways to voice opinions by phone, mail, email, web page access and so forth.

Advertisement with Partner Organizations

Outreach, due to its nature of providing specialized transportation to individuals with disabilities, older adults, Veterans, low-income individuals and families, has a variety of partner organizations in the human services and transportation services. When Outreach wishes to share information, it can advertise with managers of these human service and transportation service partners at centers/program or by center/program staff sharing such information

Customer Satisfaction Survey

Outreach is a nonprofit organization that serves minority, low-income, limited-English speaking populations, many of whom are disabled, older adults, reside in low-income households and communities of concern and some are Veterans. What these populations have in common are challenges to information, resources, and barriers to mobility. Outreach surveys its customers to assess the impact of services provided towards addressing individual challenges. Feedback enables one to better design and deliver agency services as well as to bring forth needs and strategies to the broader community through public agency forums, meetings, and planning opportunities.

Mobility Managers & Multi-Cultural and Multi-Lingual Volunteers

Outreach utilizes multi-cultural and multi-lingual mobility managers with training in social services, case management and transportation services. Mobility managers go into the households, community centers, and other locations to work one-on-one to assess mobility needs and mobility options



resources. Participants of these sessions can better articulate their own needs and preferences through this process. Participants become advocates for themselves and their communities. Participants are informed of meetings and planning sessions or other such opportunities so they can voice their opinions. Outreach provides transportation options to any such meeting at no cost to the participants.

Outreach mobility managers work directly with multi-lingual and multi-cultural volunteers from various communities in order to provide more authentic communication and improved understanding. Alternative advertising/marketing/information strategies are used that involve more organized meetings out in the community at centers/programs or hosted by Outreach at our meeting rooms; small group interactions with the public to ensure informational resources are understood and questions can be asked and participation can be encouraged; and one-on-one individual assistance and continued support. These varying community interactions and group vs individual approaches better ensure that underserved members of the public and our customers can have a voice in their communities and for themselves.

VIII. Moving Forward

Outreach's goal is to continue to provide services without excluding or discriminating against individuals on the basis of race, color and national origin. In addition to the Title VI protected categories, Outreach shall continue to take steps to ensure that our programs and activities do not exclude or discriminate against low-income individuals or other classes protected by Federal or State law.

Outreach shall continue to engage in the strategies in I – VII above and adapt as needed.

Outreach shall continue to find ways to make transportation affordable and accessible to target populations as has been one of our objectives for decades.



Outreach shall continue to be a voice for equity, social justice, environmental justice, by participating with the public, public agencies responsible for decision-making, engaging with the non-profit and faith based communities of service providers and organizations, and most importantly working one-on-one with individuals regardless of race, color, national origin and with limited-English capabilities.

Diversity: Outreach staff and volunteers who engage on committees or help deliver information to protect and vulnerable populations remain very diverse and comparable to the diversity of the population at large.

IX. Closing

Outreach is not a public agency but a nonprofit organization who engages in a large variety of means of communication with both its own customers based of individuals as well as to share information about Outreach services at public/community/program meetings and locations through the area.

Outreach utilizes many strategies and means to inform our customers, care-givers, community programs and service providers of opportunity to engage in decision making at public agencies.

Outreach provides mobility options to reduce barriers to attending meetings and often provides free transportation.

Outreach provides advocacy and other means of soliciting input and organizing that input to get to public agency decision makers on behalf of low-income, minority and LEP populations among other vulnerable populations.

Outreach engages our customers and the broad public in a range of meeting sizes and accessible locations, focusing on participation out in the community in small groups and one-on-one with the target populations.



Outreach surveys participants of services for feedback and continuous improvement.

Our participation plan is meant to be a living document that will continuously be updated and Outreach graciously accepts recommendations on how to improve our efforts.

#5. Limited English Proficiency (LEP) Plan



Outreach & Escort, Inc. (OUTREACH)

Limited English Proficiency (LEP) Plan

And ADA Accommodation

Approved by Outreach & Escort Board of Directors 11/28 2022
For FY22–FY24

I. Introduction

This *Limited English Proficiency Plan* has been prepared to address OUTREACH's responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq, and the implementing regulations, which state that no person shall be subjected to discrimination on the basis of race, color or national origin.

Executive Order 13166 - "Improving Access to Services for Persons with Limited English Proficiency", requires that recipients of Federal financial assistance provide meaningful access to LEP applicants and beneficiaries. The Executive Order establishes that differing treatment based upon a person's inability to speak, read, write or understand English is a type of national origin discrimination. It directs each federal agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discrimination does not take place. This order applies to all State and local agencies that receive federal funds.

II. Plan Summary

OUTREACH has developed this *Limited English Proficiency Plan* to help identify reasonable steps for providing language assistance to persons with limited English proficiency (LEP) who wish to access services provided by OUTREACH. As defined in Executive Order 13166, LEP persons are: Those who do not speak English as their primary language; and have a limited ability to read, write, speak or understand-English, as a result of national origin.

This plan outlines how to identify a person who may need language assistance, the way in which assistance may be provided, staff training that may be required, and how to notify LEP persons that assistance is available.

In order to prepare this plan, OUTREACH undertook the U.S. DOT four-factor LEP analysis which considers the following factors:

1. The number or proportion of LEP persons in the service area who may be served or are likely to encounter an OUTREACH program, activity or service,
2. The frequency with which LEP persons come in contact with OUTREACH programs, activities or services,

3. The nature and importance of programs, activities or services provided by OUTREACH to LEP individuals, and
4. The resources available to OUTREACH and overall cost to provide LEP assistance.

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

III. Four-Factor Analysis

1. *The number or proportion of LEP persons in the service area who may be served or are likely to encounter an OUTREACH program, activity or service.*

The Census Bureau has a range of four classifications of how well people speak English. The classifications are “very well,” “well,” “not well,” and “not at all” as Limited English Proficient persons.

Table 1: LANGUAGE SPOKEN AT HOME FOR THE POPULATION 5 YEARS AND OVER. Language Spoken at Home by Ability to Speak English, Persons Age 5 years and Over, 2016-2020, San Francisco Bay Area, American Community Survey 2016-2020
Data for Santa Clara County

Speaks English Less than “Very Well”	2012-2016 Number	2012-2016 Percentage	2020 Number	2020 Percentage
Spanish	131,546	7.5%	118,954	6.57%
Korean	2,968	0.7%	10,719	0.59%
Chinese	15,265	3.6%	78,198	4.32%
Vietnamese	17,386	4.1%	75,218	4.15%
Tagalog	4,664	1.1%	19,062	1.05%
Other Languages	219,186	12.4%	302,151	14.7%
Total Speaking English Less than “Very Well”	391,015	22.2%	354,229	20%
Speaks English “Very Well”	1,373,357	77.8%	1,462,377	80%
TOTAL	1,764,372	100%	1,816,606	100%

Notes: Tabulation prepared by VTA staff based on data from the American Community Survey (ACS) 2016-2020.

Updated information from the 2016-2020 ACS survey is based on estimates but the ACS survey did specifically break out **the Spanish number and percentile and Spanish is the one language that exceeded the 5% threshold.**

A. The Total Population for Santa Clara County was 1,894,783, although this number may not be precise due to independent rounding. The source was the U.S. Census, State of California, Department of Finance, Demographic Research Unit. This was cited in the Santa Clara Valley Transportation Authority’s Annual Comprehensive Financial Report for the Fiscal year Ended June 30, 2022. (Page 3-18).

B. Other sources may vary such as the State of California Department of Finance with a 2020

population estimated at 1,996,394. Per the 2017 American Community Survey, 5-Year Estimates, 12% of the population in the county is 50-74 years of age, consistent with the state at 13% (Sourcewise page 29).

C. The 2019 data from the U.S. Census Bureau American Community Survey 5-Year Estimates, Table B01001; 2050 data from the MTC Plan Bay Area, reports older adults in SCC at 12% in 2019 and expected to go to 13% by 2035; same data sets reported 8% of the populations in SCC living with a disability in 2019 and for that to remain at that level by 2035 but for persons over 60 years of age that percentage was higher at 31% in 2019.

D. Per the California Department of Finance, the older adult population of 60 plus years is becoming more diverse in Santa Clara County (Area Plan on Aging, 2020-2024) between 2010 and 2020. (Marvin, pages 3 and 5 in Nelson Nygaard's "MTC Coordinated Plan TAC Third Meeting May 2, 2002, draft).).

E. Languages Spoken at Home (U.S. Census) 2021 provides additional data to the United Census Bureau, 2016-2020 American Community Survey. Table B16001: 5-year estimate based on 2015 data. As reflected in the table, the top five non-English Languages Spoken in Santa Clara County for persons over 5 years of age "who speak English less than well" are in descending order: 6.57% Spanish (118,954); 4.32% Chinese (Mandarin and Cantonese) (78,198; 4.15% Vietnamese (75,218); 1.09% Tagalog (19,062); and 0.59% Korean (10,719). (VTA Title VI page 97).

As a non-profit organization, special attention is focused on meeting the needs of older adults and persons with disabilities. Per the California Department of Finance, the older adult population of 60 plus became more diverse between 2010 and 2020 in SCC (Area Plan on Aging, 2020-2024) and Outreach will accommodate this cultural and language diversity. Per the 2019 data from the U.S. Census Bureau American Community Survey 5-Year Estimates, Table B01001; 2050 data from the MTC Plan Bay Area, older adults in SCC were reported at 12% in 2019 and expected to go to 13% by 2035; same data sets reported 8% of the populations in SCC living with a disability in 2019 and for that to remain at that level by 2035. ADA accommodations shall also be made.

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

OUTREACH assessed the frequency with which staff and drivers have, or could have, contact with LEP persons. The following “touch points” and frequencies have been identified:

PRIMARY TOUCH POINTS	FREQUENCY
Drivers	Frequently
OUTREACH Eligibility	Frequently
Rider’s Guide	Often- Frequently
Dispatchers/Schedulers	Often
Mobility Managers	Often
Website	Occasionally
Social Workers/Case Managers	Often

SECONDARY “TOUCH POINTS”	FREQUENCY
Office Staff	Occasionally
Road Supervisors	Rarely
Print Media	Occasionally

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

The largest geographic concentration of LEP individuals in the OUTREACH service area are speakers of Spanish followed by Asian languages. Community transportation and social services targeting low-income individuals, persons with disabilities, and older adults are most likely to encounter LEP individuals.

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

OUTREACH assessed available resources that could be used for providing LEP assistance, including determining: how much a professional interpreter and translation service would cost on an as-needed basis, how to access quality translation services or tools at no cost, which of documents would be the most valuable to be translated if the need should arise, and an inventory of available organizations that OUTREACH could partner with for OUTREACH’s translation efforts.

Safe Harbor Provision – The Federal Transit Administration Circular 4702.1B states: “The Safe Harbor Provision stipulates that, *if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with*

the recipient's written translation obligations. Translation of non-vital documents, if needed, can be provided orally. If there are fewer than 50 persons in a language group that reaches the five percent (5%) trigger, the recipient is not required to translate vital written materials but should provide written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost.

These safe harbor provisions apply to the translation of written documents only. They do not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable. A recipient may determine, based on the Four Factor Analysis, that even though a language group meets the threshold specified by the Safe Harbor Provision, written translation may not be an effective means to provide language assistance measures. For example, a recipient may determine that a large number of persons in that language group have low literacy skills in their native language and therefore require oral interpretation. In such cases, background documentation regarding determination shall be provided to FTA in the Title VI Program."

Based on the four-factor analysis, Spanish is the quantifiable population that are limited-English proficient. However, vital documents, including all Title VI related documents, are available not only in Spanish but also Chinese and Vietnamese.

IV. Limited English Proficiency (LEP) Plan Outline

There are five areas that comprise OUTREACH's LEP Plan:

1. Identifying LEP individuals who need language assistance
2. Language assistance measures
3. Training Staff
4. Providing Notice to LEP Plan
5. Monitoring and updating the LEP Plan

1. Identifying LEP individuals who need language assistance

How OUTREACH may identify an LEP person who needs language assistance

- Examine records for language assistance that had been received in the past, to determine what kinds of language assistance may be needed in the future.
- Examine applications that are currently in languages other than English (e.g. Spanish, and Vietnamese, etc.) to see demand and also track any requests for other language assistance to apply for agency programs and services.
- When OUTREACH sponsors an event, have a staff person greet participants as they arrive. By informally engaging participants in conversation determine if they will need language assistance to fully participate. Track such information for future events.
- Have Census Bureau *Language Identification Flashcards* available at OUTREACH events near the registration table of event, and at front desk of business office location. Individuals self-identify as persons not proficient in English may not be able to be accommodated with translation assistance at the event, but it will assist in identifying language assistance needs for future events.
- Have *Language Identifying Flashcards* on all vehicles to assist coach operators in identifying specific language assistance needs of passengers. If such individuals are encountered, vehicle operators will be instructed to record and report so OUTREACH staff can follow-up with the client.
- Mobility Management and other staff who interact with the public and clients or who deliver trips will also be instructed to maintain records of LEP individuals needing assistance in person or over the phone so that requests for language assistance can be tracked in the appropriate database.
- OUTREACH provides emergency specific *Language Identifying Assistance* flash cards in multiple languages to assist drivers to communicate with LEP riders during or after an emergency/disaster. Drivers will report back to dispatch any instances of

the use of these tools for purposes of recording and follow-up with the customer to determine any future assistance needed.

2. Language Assistance Measures

There were and will continue to be numerous language assistance measures available to LEP persons, including both oral and written language services. There are also various ways in which OUTREACH staff responded to LEP persons, whether in person, by telephone or in writing.

How OUTREACH assisted or will assist an LEP person who needs language assistance.

- OUTREACH continued and will continue to provide vital information to LEP groups on OUTREACH programs and services;
- Networked with human service organizations and internal agency programs that provide services to LEP individuals and sought opportunities to provide information on OUTREACH programs and services;
- Provided a bilingual Community OUTREACH Coordinator at community events, other public events, and meetings as needed;
- Placed statements in notices and publications that interpreter services are available for these meetings, with reasonable advance notice;
- Tracked information from front-line staff concerning any contacts with LEP persons during the previous year;
- Provided *Language Identification Flashcards* at the front desk, onboard OUTREACH vehicles and other locations as appropriate;
- Posted the OUTREACH Title VI Policy and LEP Plan on the agency website, www.outreach3.org;
- Provided group travel training to LEP persons with the assistance of bilingual staff;
- Included language “Spanish a plus” and “Bilingual a plus” on employee and volunteer recruitment materials;
- OUTREACH website has the capability for a person to select a language, click and have automatic translation services via Yahoo! Babelfish and google Translate;
- When an interpreter is needed for a language other than English in person or on the telephone, staff will attempt to access language assistance from a professional translation service or qualified community volunteers or social workers/case

managers.

- For the hearing impaired: Sign-language interpreters will be provided upon request. Video Relay Services (VRS) which is always and VRS is a form of the Telecommunications Relay Service (TRS) that enables persons with hearing disabilities to use American Sign Language (ASL) to communicate with voice telephone users through video equipment, rather than through typed text.

3. **Staff Training**

How OUTREACH trained staff and continues to train staff on its role and responsibilities in providing meaningful access to services for LEP persons

- Developed curriculum and corresponding PowerPoint presentations to educate OUTREACH staff on Title VI LEP requirements for providing meaningful access to services for LEP persons;
- Provided staff with a description of language assistance services offered by OUTREACH;
- Provided staff with specific procedures to be followed when encountering an LEP person, including how to handle a potential Title VI/LEP complaint;
- Instructed staff on the use of FTA *Language Identification Flashcards*;
- Instructed staff on the use of on-line translation tools via <http://translate.google.com> or <http://babelfish.yahoo.com/> with appropriate editing for accuracy by qualified persons, etc.

4. **Providing Notice to LEP Persons**

How OUTREACH provided and continues to provide Notice to LEP Persons, both oral and written communications;

- Offered general information, such as operation hours and services through phone system.
- Used greetings, both Spanish and English, directing callers to select which language they prefer;
- Continued to provide the Rider's Guide in English and Spanish and accessible formats

- Continued to translate vital documents and ensure they are accurate (vital documents are defined as those documents without which a person would be unable to access services)

The following are written communications printed in both English and Spanish:

- Riders Guide which contains information on fares, accessibility, and general riding information;
- Applications for services; and
- All Title VI and LEP materials
- Provided printed information in multiple languages about OUTREACH's non-discrimination policies and information on the local/federal complaint process, place them on the agency's website and have them available at public meetings;
- Provided a tagline affirming OUTREACH will make reasonable accommodations to translate any materials into Spanish or provide an interpreter at public hearings and meetings;

5. **Monitoring and updating the LEP Plan**

This plan is designed to be flexible, and should be viewed as a work in progress. As such, it is important to consider whether new documents and services need to be made accessible for LEP persons, and also to monitor changes in demographics and types of services.

OUTREACH updates the LEP every three (3) years, as required by U.S. DOT.

How OUTREACH will examine and update its LEP Plan:

- Record and report how on the number of LEP persons were encountered annually through OUTREACH's compliance efforts; Determine if needs were reasonably met through OUTREACH's bilingual staff, language and translation assistance, etc.
- Determine how the needs of LEP persons have been addressed;
- Participate with external entities authorized to do transportation planning in the state, region and local level as they assess the needs and plan for current LEP population in the service area;
- Determine whether agency financial resources are sufficient to fund language assistance resources needed;

- Determine whether OUTREACH and its Contractor(s) have fully complied with the goals of this LEP Plan;
- Determine whether complaints have been received concerning the agency's failure to meet the needs of LEP individuals; and
- Obtain input from customers on a regular basis about their language needs.

IV. Dissemination of the OUTREACH LEP Plan

How the OUTREACH LEP Plan will be disseminated to customers and the community;

A link to the OUTREACH LEP Plan and the Title VI Plan will be included on the OUTREACH website: www.OUTREACH3.org

OUTREACH's LEP Plan will also be shared with human service organizations in its service area.

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

Questions or comments regarding the LEP Plan may be submitted to the OUTREACH Executive Director as follows:

Marvin Custodio, Title VI Administrator
2221 Oakland Rd. Suite #200
San Jose, CA 95131
(408) 678-8585

Appendix A: Title VI Program Limited English Proficiency (LEP) Reporting Form and ADA Accommodation Form

**Title VI Program Limited English Proficiency (LEP)
Reporting Form and ADA Accommodation Form**

Name: _____

Date: _____

Walk-In/Direct Contact: _____ Telephone: _____ In Writing: _____

In Public Setting: _____

How was the interpreter/translation services provided?

Staff: _____

Contractor Staff: _____

Volunteer: _____

Phone Interpreter Service: _____

Other: _____

Language: _____

ADA Accommodation Need: _____

ADA Format or Method: _____

Length of Time to Provide Service: _____

#6. Table depicting racial breakdown of transit-related, non-elected planning boards, advisory councils or committees (Outreach is a non-profit).

Outreach & Escort, Inc.

Non-profit

Board of Directors and Advisory/Volunteer

Racial Characteristics

Race	Percent
Caucasian	37.5
Hispanic	25
African American	12.5
Asian American	25
Native American	0
Total	100

Outreach reaches out to members of the community, business community, to clients and care-givers, and to the general public to engage and encourage diverse participation. In addition to race/ethnicity, Outreach attempts to attract persons with varying functional abilities/disabilities and age as the agency serves persons with disabilities, older adults and low-income persons of all ages.

#7. No facility has been constructed so no Title VI equity analysis needed –
Not applicable.

#8. Sub-recipient is not a fixed route provider or public agency – Not applicable.

#9. Outreach non-profit Board Approval Action for Title VI Program



OUTREACH & ESCORT, INC. RECORD OF BOARD ACTION

On 11/28/22, the Outreach & Escort, Inc. Board of Directors approved the following:

FTA Certifications and Assurances

Title VI Materials and Documentation including but not limited to:

- Notification of Title VI Protections with Locations of Notice
- Title VI Complaint Procedure, How to File A Complaint and Complaint Form (Tracking and Investigating Process)
- Outreach & Escort, Inc. Title VI Tracking Form (No complaints to report)
- Outreach & Escort, Inc. Title VI Public Participation Plan
- Outreach & Escort, Inc.'s Limited English Proficiency Plan

By:


Signature

Russell Klein, Chairman