



TITLE VI PROGRAM

UPDATED: JUNE, 2017

Approved by WestCare California, Inc.

1505 N Chestnut Avenue, Fresno, CA 93703

559.251.4800

www.westcare.com

Introduction

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

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WestCare California, Inc. Title VI Notice to the Public

Notifying the Public of Rights Under Title VI

WestCare California, Inc.

- WestCare California, Inc. operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with WestCare California, Inc.
- For more information on WestCare California, Inc. civil rights program, and the procedures to file a complaint, contact 559.251.4800, or visit our administrative office at 1505 N Chestnut Avenue, Fresno, CA 93703. For more Information, visit www.westcare.com.
- A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590
- If information is needed in another language, contact 559.251.4800

**Notificar al público de los derechos bajo el título VI
WestCare California, Inc.**

Notificar al público de los derechos bajo el título VI

WestCare California, Inc.

- WestCare California, Inc. opera sus programas y servicios sin respecto a raza, color y origen nacional con arreglo al título VI de la Civil Ley de derechos. Cualquier persona que cree que él o ella ha sido agraviado por cualquier práctica discriminatoria ilegal bajo el título VI puede presentar una queja con WestCare California, Inc.
- Para obtener más información sobre el programa derechos civiles capaz de industrias y el procedimientos para presentar una queja, llame al (559) 651-8150, o visite nuestra oficina administrativa en 1505 N. Chestnut Avenue, Fresno, CA 93703. Para más información, visite www.westcare.com
- Un demandante puede presentar una queja directamente con el Federal Transit Administration por archivar una queja con la Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590
- Si se necesita información en otro idioma, contacte al 559.251.4800.

List of Locations Where Title VI Notice Is Posted

WestCare California, Inc. notice to the public is currently posted at the following locations:

Location Name	Address	City
Administrative Offices	1505 N Chestnut Avenue	Fresno
Admissions Office	601-625 E Belmont	Fresno
Front Business Offices, Residential Facility	2772 S Martin Luther King Jr. Blvd	Fresno
VAN 81347S1	2772 S Martin Luther King Jr. Blvd	Fresno

The Title VI notice and program information is also provided on WestCare California, Inc. website at www.westcare.com

Title VI Complaint Procedures

As a recipient of federal dollars WestCare California, Inc. is required to comply with Title VI of the Civil Rights Act of 1964 and ensure that services and benefits are provided on a non-discriminatory basis. WestCare California, Inc. has in place a Title VI Complaint Procedure, which outlines a process for local disposition of Title VI complaints and is consistent with guidelines found in the Federal Transit Administration Circular 4702.1B, dated October 1, 2012.

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

Within 10 business days of receiving the complaint, WestCare California, Inc. will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office. WestCare California, Inc. has 30 days to investigate the complaint. The complainant will be notified in writing of the cause to any planned extension to the 30-day rule.

If more information is needed to resolve the case, WestCare California, Inc. may contact the complainant. The complainant has 10 business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within 10 business days WestCare California, Inc. can administratively close the case.

A case can be administratively closed also if the complainant no longer wishes to pursue their case. After the investigator reviews the complaint, she/he will issue one of two letters to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. An LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member, or other action will occur. If the complainant wishes to appeal the decision, she/he has 10 business days after the date of the letter or the LOF to do so.

A person may also file a complaint directly with the Federal Transit Administration, at FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.

WestCare California, Inc. Title VI Complaint Form

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

WestCare California, Inc. Title VI Complaint Form, Page 2

Section IV:		
14. Have you previously filed a Title VI complaint with WestCare California, Inc.?	YES	NO
Section V:		
15. Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court? <input type="checkbox"/> YES* <input type="checkbox"/> NO If yes, check all that apply: <input type="checkbox"/> Federal Agency _____ <input type="checkbox"/> State Agency _____ <input type="checkbox"/> Federal Court _____ <input type="checkbox"/> Local Agency _____ <input type="checkbox"/> State Court _____		
16. If you answered "yes" to #15, provide information about a contact person at the agency/court where the complaint was filed.		
Name:		
Title:		
Agency:		
Address:		
Telephone:		Email:
Section VI:		
Name of Transit Agency complaint is against:		
Contact Person:		
Telephone:		

You may attach any written materials or other information that you think is relevant to your complaint. Signature and date are required below to complete form:

Signature _____ Date _____

Please submit this form in person or mail this form to the address below:
 WestCare California, Inc.
 Director of Contract Compliance, Title VI Coordinator
 1505 N Chestnut Avenue
 Fresno, CA 93703

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

WestCare California, Inc. has not been involved in any transportation-related Title VI investigations, lawsuits or complaints.

WestCare California, Inc. List of Investigations, Lawsuits and Complaints

Type of Process	Date	Summary (including basis of complaint)	Status	Action(s) Taken
Investigations				
1. None				
2.				
Lawsuits				
1. None				
2.				
Complaints				
1. None				
2.				

Public Participation Plan

About WestCare California, Inc.

WestCare California, Inc. is a non-profit 501 c (3) organization that provides health and human services to adults and adolescents with mental health, and substance use disorders related disabilities. WestCare California, Inc. facilities are licensed and certified by the State of California Department of Health and Human Services. Services for the program participants may be funded by Federal, State, County contracts, Medi-Cal or private pay.

WestCare California, Inc. maintains systems to gather stakeholder input regarding agency services and conducts public relations and outreach activities in order to create meaningful opportunities for public engagement.

VISION, MISSION

Vision

WestCare devotes our best collective and individual efforts toward "uplifting the human spirit" by consistently improving, expanding and strengthening the quality, efficacy and cost-effectiveness of everything we do in building for the future.

Mission

WestCare empowers everyone with whom we come into contact to engage in a process of healing, growth and change benefiting themselves, their families, coworkers and communities.

Motto

Uplifting the Human Spirit

Purposes of this Plan

Public participation is the process through which stakeholders can partake directly in agency decision-making, and express their concerns, desires, and values. It is the mission of WestCare California, Inc. empower everyone with whom we come into contact to engage in a process of healing, growth and change benefiting themselves, their families, coworkers and communities. At every opportunity through prescribed methods the agency will solicit input from stakeholders in order to best support persons served without creating disproportionately high and adverse human health or environmental effects on minority and/or low-income populations.

Summary of Outreach Efforts

The following is a summary of outreach efforts conducted by WestCare California, Inc. as they relate to Title VI requirements under the Public Participation Plan. Many of our activities are conducted in partnership or ad hoc outreach with other service organizations and non-profit agencies within the community. This is in no way a complete list but rather documents the agency's outreach efforts as they relate specifically to minority and low-income populations.

Board Meetings Open to the Public

WestCare California, Inc. quarterly Board meetings are open to the public and meeting date may be obtained by contacting our office.

Community Action Council

WestCare California, Inc. has monthly Community Action Council (CAC) meeting and its makeup include but not limited to consumers, veterans, legal, housing, higher education and the American Indian, African American and Hispanic community. The CAC reviews services and facilities and recommendations are sent to administrative staff and the Board of Directors.

Care for Homeless

WestCare California, Inc. is a participating member of the Fresno Madera Continuum of Care with our Sr. Vice President, serving as Vice-President of the Continuum. Additionally, we have several members of staff that serve on various sub-committees for the continuum. The fundamental components of a continuum of care are to facilitate a coordinated, unduplicated and seamless service provision for our community's homeless population.

WestCare California, Inc. Semi-Annual Graduation

WestCare California, Inc. hosts a Graduation Ceremony semi-annually annually to recognize the achievements of both program participants and members of the community. This is a public event that is publicized with press releases to a number of various media outlets and also serves as a forum for public input. This event typically attracts 200-300 guests.

Satisfaction Surveys

WestCare California, Inc. conducts Satisfaction Surveys with stakeholders of the agency to determine level of satisfaction and gain input regarding unmet needs.

Exit Satisfaction Surveys

WestCare California, Inc. conducts Exit Satisfaction Surveys with program participants of the agency to determine level of satisfaction and gain input regarding unmet needs.

Food, Clothing and Toy Drives

Annually, (at a minimum) WestCare California, Inc. conducts food, clothing and toy drives to connect with and benefit low-income populations. These events are publicized through press releases to various media outlets and flyers.

WestCare California, Inc. Website

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

The agency also maintains an Outreach Department that meets on a regular basis and sets annual marketing and outreach goals. The Department, in conjunction with other community partners, conducts various comprehensive outreach activities throughout the year including public engagements, newsletters, open houses, job fairs, health & wellness events and press releases. Additionally, on a bi-annual basis WestCare California, Inc. develops a comprehensive strategic marketing plan that includes public relations, employee and consumer relations, and new program development. An annual In-Service training program for staff is included in this plan.

Language Assistance Plan

Overview

The first section in this document describes the purpose of the Language Assistance Plan (LAP). The second section in this document provides the four-factor Limited English Proficient (LEP) analysis (as outlined by the Department of Transportation (DOT) used to identify LEP needs and assistance measures. The four-factor LEP analysis includes:

- Factor 1:** The number or proportion of LEP persons in the service area who may be served or are likely to enter WestCare.
- Factor 2:** The frequency with which LEP persons come in contact with WestCare services.
- Factor 3:** The nature and importance of programs, activities or services provided by WestCare California, Inc. to the LEP population.
- Factor 4:** The resources available to WestCare California, Inc. and overall cost to provide LEP assistance.

The third and final section discusses the implementation of the Language Assistance Plan, which includes methodologies for identifying LEP individuals, providing services, establishing policies, monitoring the LAP, and recommendations for future LAP implementations.

Purpose of the Language Assistance Plan

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance. One critical concern addressed by Title VI is the language barrier that Limited English Proficiency (LEP) persons face with respect to accessing information about and using transit service. Transit operators must ensure that this group has adequate access to the agency's programs and activities, including public participation opportunities.

Executive Order 13166, titled "Improving Access to Services for Persons with Limited English Proficiency," forbids funding recipients from "restricting an individual in any way in the enjoyment of any advantage or privilege enjoyed by others receiving any service, financial aid, or other benefit under the program," or from "utilize[ing] criteria or methods of administration which have the effect of subjecting individuals to discrimination because of their race, color, or national origin, or have the effect of defeating or substantially impairing accomplishment of the objectives of the program as respects to individuals of a particular race, color, or national origin."

FTA Circular 4702.1B was developed by the Federal Transit Administration (FTA) and details the administrative and reporting requirements for recipients of FTA financial assistance to comply with Title VI and related executive orders including on LEP.

The United States Department of Transportation (DOT) published guidance that directed its recipients to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for LEP customers.

WestCare California, Inc. ensures that participant whom have Limited English Proficiency are provided with the necessary assistance by assigned staff member, outside agencies or referrals in order to meet their needs.

Language Assistance Implementation Plan

Methodologies

Identifying LEP Individuals

Minority individuals referred to the WestCare California, Inc. programs are predominant English speaking with the second highest population being Hispanic. The consumers that are primarily served by the WestCare California, Inc. program have disabilities but over 98% speak English.

While there is a substantial minority population in the region, the majority is Hispanic with most of them also speaking English. In the 41 year history of the WestCare California, Inc. there were not many consumers served who were LEP. The agency does, however, have systems in place to provide access to minority populations.

Providing Services

While the transit operations of WestCare California Inc. does not currently have an on-going need for professional translation services, on-site agency staff who are fluent in Spanish provide translation services at all facilities as needed. Documents that are offered in Spanish include:

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

Other documents can be translated to Spanish orally as appropriate.

Communicating Availability of Language Assistance

Individuals who are referred to WestCare California, Inc. programs for services are assigned a counselor or case manager who provides one-on-one guidance and program planning. The counselor or case manager can offer Spanish translation services as needed. Most agency reception staff can also offer translation services to guests and consumers' family members as appropriate or have quick and easy access to them.

Monitoring

WestCare California, Inc. maintains an Agency Accessibility Plan which is designed to minimize barriers that are created by architectural factors, environmental factors, attitudinal factors, financial and employment barriers and communication barriers such as language. This plan is reviewed and updated annually.

WestCare California, Inc.'s Annual Report is analyzed for trends and patterns that indicate a need for additional services. This report includes ethnicity and can be used as a guide to determine the need for additional translation services.

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

Employee Training

WestCare California, Inc. conducts monthly In-Service training for staff that can include Customer Service and Language Assistance training.

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

Safe Harbor Provision

The Federal Transit Authority Circular 4702.1B states:

"DOT has adopted DOJ's Safe Harbor Provision, which outlines circumstances that can provide a "safe harbor" for recipients regarding translation of written materials for LEP populations. The Safe Harbor Provision stipulates that, if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with the recipient's written translation obligations. Translation of non-vital documents, if needed, can be provided orally. If there are fewer than 50 persons in a language group that reaches the five percent (5%) trigger, the recipient is not required to translate vital written materials but should provide written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost.

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

Membership of Non-Elected Committees and Councils

WestCare California, Inc. does not have a non-elected transit related advisory council at this time.

Title VI Equity Analysis

WestCare California, Inc. does not have transit related facilities.

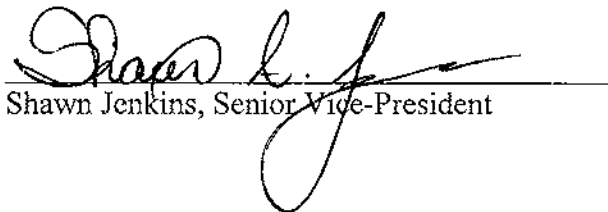
Approval of WestCare California Inc. Title VI Program

WestCare California, Inc. desires to comply with Title VI of the Civil Rights Act of 1964, including new provisions detailed in U.S. Department of Transportation's FTA Circular 4702.1B, "Title VI Requirement and Guidelines for Federal Transit Administration Recipients,"

Senior Vice-President, Shawn Jenkins authorizes approval of the compliance plan developed by Contract Compliance to comply with necessary provisions of the Civil Rights Act.¹

WestCare California, Inc. will implement the components of the plan in order to meet Federal requirements.

WestCare California, Inc. will further implement policies that may be necessary to comply with subsequent revisions or interpretations to the Civil Rights Act.


Shawn Jenkins, Senior Vice-President

6/8/17
Date

¹ Attached is the resolution of the WestCare California, Inc. Board of Directors authorizing the contracting powers of the officers of the corporation.



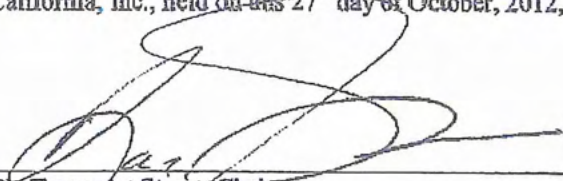
RESOLUTION WCCA 2012-03

RESOLUTION OF WESTCARE CALIFORNIA, INC. BOARD OF DIRECTORS AUTHORIZING THE CONTRACTING POWERS OF THE OFFICERS OF THE CORPORATION.

WHEREAS, the following organizational resolution was passed at a regular meeting of the Directors of WestCare California, Inc. (the "Corporation"), held on October 27, 2012, at which a quorum was present.


THEREFORE, BE IT RESOLVED that, subject to any Contract Policy as may be adopted by the Board, in its discretion, and in addition to those authorizations expressly set forth in Section 5 of *The Amended and Restated Bylaws of WestCare California, Inc.* dated October 27, 2012, and unless otherwise limited or directed by the Board, the President, Chief Executive Officer, Chief Financial Officer, Chief Operating Officer, and Regional Senior Vice President be, and each of them hereby is, authorized to sign and execute in the name and on behalf of the Corporation all applications, contracts, licenses, permits, leases and other deeds and documents or instruments in writing of whatever nature that may be reasonably required in the ordinary course of business of the Corporation, and pursuant to the mission and purpose of the Corporation, and that may be necessary for, and incidental to, the lawful operation of the business of the Corporation, and to do such other acts and things as such officers deem necessary or advisable to fulfill such legal requirements as are applicable to the Corporation, its mission and purpose.

PASSED AND ADOPTED at its regular meeting of the Board of Directors of WestCare California, Inc., held on this 27th day of October, 2012, by a unanimous vote:



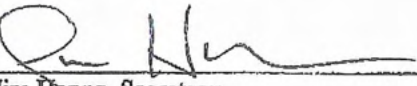
Dr. Toussaint Streat, Chair
Board of Directors
WestCare California, Inc.

October 27, 2012
Date



Richard Steinberg, President
Board of Directors
WestCare California, Inc.

October 27, 2012
Date



Jim Hanna, Secretary
Board of Directors
WestCare California, Inc.

October 27, 2012
Date