

# TITLE VI PROGRAM

Approved by Common Ground Senior Services  
Board of Directors on March 1, 2021

Common Ground Senior Services  
serving Amador, Calaveras and Tuolumne Counties  
80 Ridge Road, Suite A  
Sutter Creek, CA 95685  
Phone: 209-223-3015  
[www.commongroundseniorservices.org](http://www.commongroundseniorservices.org)

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## Introduction

This document was prepared by Common Ground Senior Services and its Board of Directors 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."

Common Ground Senior Services, a non-profit agency founded in 2000 was developed to empower, enhance, and maintain the dignity of our communities' older adults by assisting them with aging-in-place in Amador, Calaveras and Tuolumne Counties. In addition to being the provider of the home-delivered Meals on Wheels program, the agency also provides transports to health and wellness appointments. Common Ground holds contracts for services with Caltrans, LogistiCare, Calaveras Community Development Block Grant and the local Area Agency on Aging.

The agency's staff works in collaboration with other similarly involved groups who are engaged in complimentary activities, and advocates for older adults at the county, state, and federal level. Agency staff actively participates in the following Boards and Committees: Amador, Tuolumne Commissions on Aging, Amador, Calaveras and Tuolumne Social Services Transportation Advisory Committees (SSTAC), Meals on Wheels America, Meals on Wheels California, Amador and Calaveras Chamber of Commerce, Area Agency on Aging Advisory Council, Calaveras Mariposa Community Action Agency, Calaveras and Amador County Office of Emergency Services. Staff attends Board of Supervisor's Meetings.

Common Ground has six full-time employees and 8 parttime employees and provides opportunities for individuals to participate in activities that encourage their continued involvement in the community through volunteerism.

## Notice to the Public

### Notifying the Public of Rights Under Title VI

#### **Common Ground Senior Services**

- Common Ground Senior Services 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 Common Ground Senior Services.
- For more information on Common Ground Senior Services' civil rights program, and the procedures to file a complaint, contact (209) 223-3015, or visit our administrative office at 80 Ridge Road, Suite A, Sutter Creek, CA 95685  
For more information, visit [www.commongroundseniorservices](http://www.commongroundseniorservices)
- 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, 5<sup>th</sup> Floor-TCR, 1200 New Jersey Ave., SE, Washington DC 20590

Notificar al Publico de los Derechos Bajo el Titulo VI

### **Common Ground Senior Services**

- Common Ground Senior Services opera sus programas y servicios sin respect a raza, color, y origen nacional con arreglo al titulo VI de la Civil Ley de Derechos. Cualquier persona que cree que el o ella ha sido agraviado por cualquier practica Common Ground Senior Services.
- Para obtener mas informacion sobre el programa derechos civiles capaz de industrias y el procedimientos para presentar una queja, llame at (209) 223-3015, o visite nuestra oficina administrative en 80 Ridge Road, Suite A, Sutter Creek, CA 95685  
Para mas informacion, visite [www.commongroundseniorservices.org](http://www.commongroundseniorservices.org)
- Un demandante puede presentar una queja directamente con el Federal Transit Administration por achivar una queja con la Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5<sup>th</sup> Floor-TCR, 1200 New Jersey Ave., SE, Washington DC 20590

**List of Locations Where Title VI Notice is Posted**

Common Ground Senior Services' Title VI notice to the public is currently posted at the following locations:

Location Name	Address	City
Common Ground Offices (Amador)	80 Ridge Road, Suite A	Sutter Creek, CA
Common Ground Offices (Calaveras)	423 E. St. Charles St.	San Andreas, CA
All Common Ground Vehicles		
Website	<a href="http://www.commongroundseniorservices.org">www.commongroundseniorservices.org</a>	

## Title VI Complaint Procedures

As a recipient of federal dollars, Common Ground Senior Services 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. Common Ground Senior Services has in place a Title VI consistent with guidelines found in the Federal Transit Administration Circular 4702.1B.

Any person who believes she or he has been discriminated against on the basis of race, color, creed, gender, religion, marital status, registered domestic partner status, age, national origin or ancestry, physical or mental disability, medical condition including genetic characteristics, sexual orientation, or any other consideration made unlawful by federal, state, or local laws, by Common Ground Senior Services may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form. Common Ground Senior Services investigates complaints received no more than 180 days after the alleged incident. Common Ground Senior Services will only process complaints that are complete.

Within 10 business days of receiving the complaint, Common Ground Senior Services 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. Common Ground Senior Services 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, Common Ground Senior Services 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 Common Ground Senior Services 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.

# Complaint Form

<b>Section I: Please write legibly</b>		
1. Name:		
2. Address:		
3. Phone:	3.a. 2 <sup>nd</sup> Phone:	
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
<b>Section II:</b>		
6. Are you filing this complaint on your own behalf?	<input type="checkbox"/> YES*	<input type="checkbox"/> 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 to 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.	<input type="checkbox"/> YES	<input type="checkbox"/> NO
<b>Section III:</b>		
11. I believe the discrimination I have experienced was based on (check all that apply): <input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin <input type="checkbox"/> Other _____		
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.		
<b>Section IV:</b>		
14. Have you previously filed a Title VI complaint with Common Ground Senior Services?	<input type="checkbox"/> YES	<input type="checkbox"/> NO



**Section V:**

15. Have you filed this complaint with any other Federal, State, Local Agency, or with any Federal or State Court?

YES\*       NO

\* If yes, check all that apply:

Federal Agency \_\_\_\_\_  State Agency \_\_\_\_\_

Federal Court \_\_\_\_\_  Local Agency \_\_\_\_\_

State Court \_\_\_\_\_

16. If you answered "yes" to #15, provide information about a contact person at the agency/court where the complaint was filed:

Name: \_\_\_\_\_

Title: \_\_\_\_\_

Agency: \_\_\_\_\_

Address: \_\_\_\_\_

Phone: \_\_\_\_\_

Email: \_\_\_\_\_

**Section VI:**

Name of Transit Agency complaint is against: \_\_\_\_\_

Contact Person: \_\_\_\_\_

Phone: \_\_\_\_\_

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 the form:

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Please submit this form in person or mail this form to the address below:

Common Ground Senior Services Title VI Coordinator  
80 Ridge Road, Suite A, Sutter Creek, CA 965685

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

Common Ground Senior Services has not been involved in any transportation-related Title VI investigations, lawsuits or complaints.

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

## Public Participation Plan

Common Ground's staff actively participates in various community events and conducts presentations at various organizations, in addition to participation in local events with exhibit booths as a way to disseminate information on its program.

The staff of Common Ground spends approximately 200 hours per year making presentations to groups regarding services that the agency provides to older adults, veterans, and disabled individuals. The agency is usually invited to make these presentations by a member of the group. Listed below is only a sample of organizations where the agency has been invited to make presentations in the past year: Calaveras Senior Peer Counselors, Calaveras Senior Network, Rotary of San Andreas, Valley Springs Business Association, Calaveras Newcomer's Group, Veteran Groups, American Legion, and Valley Springs Veteran Hall, Lions and Rotary Clubs in both Calaveras and Amador counties, Dignity Health Hospital in San Andreas and Sutter Amador Hospital in Jackson, Alzheimer's Association of Amador, and the Amador, Calaveras and Tuolumne Senior Centers.

Additionally, the agency participates in local events where Common Ground has an exhibit booth. These include yearly events such as the Amador Vet's Yearly Outreach Event, Local Health Fairs including hospital and several other organization's health fairs, Calaveras County Elder Abuse Awareness Day, San Andreas Community Health Walk, West Point's Logging Jamboree, Jackson & Lone Business & Community Association events, Dandelion Days, and Senior Expos.

### Reoccurring Outreach Plan:

The existing coordination within Amador, Calaveras and Tuolumne are favorable with many agencies already working together to solve the mobility needs of county residents. The designated Regional Transportation Planning Agency in Amador, Calaveras and Tuolumne assists by facilitating the coordination of agencies that contribute to conversations about the mobility needs of the community.

Common Ground standing sources and avenues for feedback and participation include: The Social Services Transportation Advisory Council (SSTAC) meetings • Community meetings • Surveys • Steering committees • Local websites • County Behavioral health departments, ARC of Amador and Calaveras • Creative Support Alternatives, Disability Resource Agency for Independent Living (DRAIL), Valley Mountain Regional Center. These agencies contribute transit-related recommendations that result from their significant collaboration. The Network of Care for Service Members, Veterans, and their Families organization and collaborative initiatives of the Area Agency on Aging and Catholic Charities have a multi-county focus in terms of their coordination efforts.

## **Outreach/Notice of Availability of Language Assistance**

It is not currently feasible for Common Ground Senior Services to translate all portions of its website.

1. To ensure that LEP individuals are aware of language assistance measures, Common Ground has included information about language assistance in its Title VI Notice to the Public.
2. Title VI information is available on the website in English and Spanish.
3. Staff will inform residents about the Language Assistance Program during any outreach and transit-orientation activities.
4. Staff will continue developing relationships with organizations that serve LEP individuals and developing strategies to spread awareness of Common Ground Language Assistance Program and transportation services.

## **Language Assistance**

### **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 analysis includes:

#### **Factor 1**

The number or proportion of LEP persons in the service area who may be served or are likely to encounter Common Ground Senior Services program, activity or service.

#### **Factor 2**

The frequency with which LEP persons come in contact with Common Ground Senior Services program, activity or service.

#### **Factor 3**

The nature and importance of programs, activities or services provided by Common Ground Senior Services to the LEP population.

#### **Factor 4**

The resources available to Common Ground Senior Services 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 (LAP)**

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, creed, gender, religion, marital status, registered domestic partner status, age, national origin or ancestry, physical or mental disability, medical condition including genetic characteristics, sexual orientation, or any other consideration made unlawful by federal, state, or local laws 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 an 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. Common Ground Senior Services language assistance plan (LAP) includes a four factor analysis and implementation plan that complies with the requirements of DOT LEP guidance.

## Four Factor Analysis

### Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by Common Ground Senior Services

Common Ground Senior Services hold a unique position in regard to meeting the Title VI requirements. As a recipient of FTA 5310 Grant funding, the agency's focus is to transport seniors, veterans and adults with disabilities where current public transit options are insufficient or do not exist. As such, Common Ground Senior Services does not offer transportation to the general public other than in situations involving a coordinated plan with other entities. Therefore, an analysis of public demographic data in Amador, Calaveras and Tuolumne does not represent actual populations but only those served by the agency's programs.

#### Demographic Data

American Community Survey 2017 reports the following statistics for **Amador County** on residents over the age of 55. Total residents: 40,099.

Amador County	Population
55 – 59 years	3,003
60 – 64 years	3,387
65 – 74 years	6,144
75 – 84 years	2,555
85 years and over	1,253
<b>Totals</b>	<b>16,342</b>

#### Demographic Data

American Community Survey reports the following statistics for **Calaveras County** on residents over the age of 55. Total residents: 46,112.

Calaveras County	Population
55 – 59 years	3,966
60 – 64 years	4,403
65 – 74 years	7,469
75 – 84 years	3,517
85 years and over	1,272
<b>Totals</b>	<b>20,627</b>

#### Demographic Data

American Community Survey reports the following statistics for **Tuolumne County** on residents over the age of 55

Tuolumne County	Population
55 – 59 years	4,214
60 – 64 years	4,967
65 – 74 years	7,859
75 – 84 years	3,739
85 years and over	1,753
<b>Totals</b>	<b>22,532</b>

According to the 2019 American Community Survey, of the older adult population 60+: Amador - 2.3% speaks less English other than well. Calaveras - 1.6% speaks less English other than well. Tuolumne County - 1.8% speaks less English other than well.

### 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.*

According to the above-mentioned survey data, there are no languages that may approach the Safe Harbor Provision threshold in the foreseeable future for Amador, Calaveras and Tuolumne Counties for our client population.

While this safe harbor provision applies to the translation of written documents only, this does not affect the requirement to provide meaningful access to LEP individuals. Common Ground will make every effort to assist LEP individuals when oral language services are necessary.

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

In the past year, contact with LEP consumers has not occurred for our clients or family members. Additionally, since Common Ground began in 2000, not once has the agency come in contact with any person who needed language assistance.

**Factor 3: The nature and importance of the program, activity, or service provided by Common Ground Senior Services to the LEP population.**

The primary purpose of Common Ground Senior Services program is to enhance the lives of all home-bound senior citizens by promoting independence and self-sufficiency by providing affordable and accessible transportation and reducing social isolation. The two-part program include senior shuttle service which provides door-thru-door individual services, and a mileage reimbursement component which utilizes volunteers in the community to provide transportation in privately owned vehicles filling the service gaps. This comprehensive approach supports group and individual trips for shopping, medical appointments, social activities and other errands within county boundaries, as well as outside of the county. The combination of solutions meets many different needs, while maximizing cost effectiveness and efficiency. To date, the agency has not encountered anyone needing language assistance. However, should this be necessary, Common Ground will make every effort to meet those clients’ needs.

**Factor 4: The resources available to Common Ground Senior Services and overall cost to provide LEP assistance.**

In the event that a non-English speaking client requires services, Common Ground has access to the Calaveras County Language Line Services.

## Language Assistance Implementation Plan

### Methodologies

#### Identifying LEP Individuals

LEP individuals can be identified when contacting the agency for services, or when identified at events and presentations.

#### Providing Services

While the agency does not currently have an on-going need for professional translation services, the agency does have access to the county's Language Line.

#### Communicating Availability of Language Assistance

Senior transportation staff is trained to refer clients and/or make arrangements for bi-lingual translation services if required. This includes accessing the Language Line, or working with county staff for bi-lingual translation.

#### Monitoring

Common Ground Senior Services 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.

Satisfaction Surveys offer an opportunity for clients and their caregivers to provide input or suggest additional services. To date, translation services for satisfaction surveys have not been requested. This report includes ethnicity and can be used as a guide to determine the need for additional translation services.

#### Employee Training

Common Ground Senior Services conducts In-Service trainings four times per year for staff that includes Customer Service and Language Assistance training.

As a part of the Accessibility Plan, the agency encourages staff interest and education on learning to more effectively communicate with individuals served by Common Ground Senior Services' programs.

### Membership of Non-Elected Committees and Councils

Common Ground Senior Services does not have a non-elected transit related advisory council at this time. However, the agency has an active five member Board of Directors.

### Title VI Equity Analysis

Common Ground Senior Services does not have transit related facilities.



## Board Resolution

### Common Ground Senior Services A California Corporation

#### A RESOLUTION OF COMMON GROUND SENIOR SERVICES BOARD OF DIRECTORS ADOPTING THE TITLE VI COMPLIANCE PROGRAM

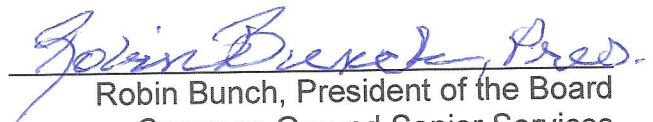
WHEREAS, Common Ground Senior Services desires to comply with Title VI of the Civil Rights Act of 1964, including new provisions detailed in US Department of Transportation's FTA Circular 4702.1B, "Title VI Requirement and Guidelines for Federal Transit Administration Recipients."

WHEREAS, the Board of Directors wishes to authorize approval of the compliance plan developed by staff to comply with necessary provision of the Civil Rights Act.

NOW, THEREFORE BE IT RESOLVED AND ORDERED that the Board of Directors of Common Ground Senior Services hereby adopts the Title VI Program as presented.

BE IT FURTHER RESOLVED, the Executive Director is authorized to implement the components of the Title VI Program in order to meet federal requirements and to implement policies that may be necessary to comply with subsequent revisions or interpretations to the Civil Rights Act.

PASSED AND ADOPTED by the Board of Directors of Common Ground Senior Services in Calaveras County, State of California, on this 1st day of March, 2021.

  
Robin Bunch, President of the Board  
Common Ground Senior Services