



Surprise the world.

Title VI Program

Howard Prep

1424 Stonum Road, Modesto, CA 95351

Phone: 209-538-4000 * Fax: 209-538-6406

Web Site: www.howardtrainingcenter.com

Adult Day Programs* Job Skills Training*

Residential Programs * Catering

Executive Director: Carla J. Strong

Board of Directors Adopted: February 17, 2016

Revised and Adopted: March 5, 2021



Howard Prep

Title VI & LEP Plan

Table of Contents

Introduction	1
Agency Overview	2
Public Rights under Title VI Notice	5
Notice to the public in Spanish	6
List of Locations of the Title VI Notice	7
Title VI Complaint Procedures	8
Title VI Complaint Form	9
Title VI Complaint Procedures in Spanish	12
Title VI Complaint Form in Spanish	13
List of Public Title VI investigations	17
Public Participation Plan	18
Language Assistance Plan	19
Introduction	21
Meaningful Access: Four -Factor Analysis	22
Safe Harbor Provision	23
Language Assistance Measures	24
Monitoring	26

Appendices

Resolution	27
California Relay Deaf and Disabled Telecommunications Program	28

INTRODUCTION

Title VI of the Civil Rights Act of 1964, a federal statute, provides that no person shall, on the grounds of LEP, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance. In addition, Presidential Executive Order 13166 requires recipients, sub-recipients of federal funds to take reasonable steps to address the needs of individuals who have limited-English proficiency in order to ensure no discrimination occurs based upon national origin.

On October 1, 2012, the Federal Transit Administration (FTA) released Circular 4702.1B to comply with the newly revised Department of Transportation (DOT) regulation issued to implement the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, and Executive Order 13166. Howard Prep's Title VI Program has been established to reflect the requirements of the new circular. As a part of the program implementation, HP is also required to submit a Title VI compliance report to the Caltrans Division of Mass Transportation every three years. This plan and report highlight HP's efforts to support and comply with all aspects of Title VI.

Program Objectives

Howard Prep's Title VI Program goals are to:

- Ensure that the level and quality of our community service transportation is provided in a nondiscriminatory manner;
- Promote full and fair participation in community service transportation decision-making without regard to LEP, color, or national origin;
- Ensure meaningful access to community service transit-related programs and activities for persons with limited English proficiency.
- Howard Prep's mission is to achieve full inclusion of individuals with disabilities in the community through the development of personal and occupation capabilities, the development and delivery of educational programs, providing services and community advocacy, and lending support to individuals so they may hold a meaningful place in the community to the fullest extent of their abilities.

AGENCY OVERVIEW

Howard Prep

Howard Prep's mission is to achieve full inclusion of individuals with disabilities in the community through the development of personal and occupation capabilities, the development and delivery of educational programs, providing services and community advocacy, and lending support to individuals so they may hold a meaningful place in the community to the fullest extent of their abilities.

June 1950, four couples met at Graceada Park in Modesto for a potluck dinner and discussion of their concern for their children. There were no suitable education opportunities available to children with developmental disabilities in Stanislaus County. By 1953 the organization incorporated as a private, nonprofit dedicated to serving all citizens in Stanislaus County living with developmental disabilities. Currently all programs at HP are designed for adults living with developmental disabilities.

The non-profit, 501 (c) (3) organization is governed by a board of directors. The board is composed of 6-12 volunteer community members. As a group, they bring experience and expertise in non-profit management, community development, and healthcare, the practice of law, education and finance. They also have knowledge of Stanislaus County and an understanding of the area's cultural and ethnic diversity. The board gives policy direction to the Executive Director who manages the day-to-day operation of the agency.

Howard Prep provides three Community Care Licensed day programs designed to meet the interest and needs of a diverse adult community with disabilities. All programs are person centered; emphasize communication, social skills training and behavioral supports. All programs are person centered and highly individualized.

Personal and Social Training Programs:

- Personal Achievement (PSA) is a facility-based day program, which focuses on remediation and reduction of significantly challenging behaviors which impact an individual's quality of life.
- Community Integration (CT) is a community-based day program providing social and recreational activities; functional skills training and community volunteer activities.
- Golden Opportunities (GOP) is a day program focused on leisure activities for seniors while maintaining their functional capacities.

Work Activity Programs:

- Community Employment (CE) offers long term support depending on the individual's disability and need. Support Services such as External Situation Assessment, Job Exploration, and Personal/Social Adjustment allow individuals to explore different job options while learning new skills.

- Production Unlimited (PU) operates as a traditional sheltered workshop providing opportunities to develop and improve work habits, skills, and productivity. Work assignments include such things as labeling, assembly, salvage, quality control, packaging and bench work.
- HP Catering and Specialties (FS) is a nontraditional sheltered workshop providing opportunities to develop and improve work habits, skills, and productivity in food service. Work activities include such things as food preparation, baking, customer service, measuring, mixing, presentation and sanitation.

Supported Employment Programs

- Enclaves are small, community-based employment groups operating with supervision. Employment opportunities are available in a wide range of jobs including HP landscape/custodial, food service, retail shipping/receiving, order picking and warehouse maintenance.
- Individual Placement provides long term, community-based employment. Employment opportunities are dependent on individual interests and positions available in the community.
- Transportation is offered and may be provided to and from work for participants in vocational programs when public transportation services are not available.

Family Living

- Home-At-Last develops alternative individual home living opportunities for those with developmental disabilities. Host families are private families who have chosen to welcome a person with a disability into their family. After Host families are trained, the individual and family are carefully matched to provide the basis for a stable, long-term family living option which is mutually satisfying.

Four programs provide transportation to participants; PSA, CT, GOP, CE. These programs share resources whenever possible, including the transportation fleet. All programs currently share the campus located on Stonum Road in Modesto. A portion of CE is operated offsite at the multiple contracted work locations.

All of the adult population taking part in programs at HP live with at least one developmental disability, in some cases many are confined to a wheelchair at all times. Many of the clients are not able to use public transportation and of those who can, they often do not have a safe path of travel to public transit. The clients in PSA are in need of attendant care and hands-on assistance for even their basic needs.

PSA programs are community-based programs, required by approved program design to organize community outings for the clients while teaching community integration skills; the program also encourages volunteerism on the part of the clients. The GOP program focuses on clients staying physically and mentally active in order to enhance their independence and quality of life. All

clients are referred through Valley Mountain Regional Center (VMRC) to HP. HP Case Coordinators work closely with VMRC, the client and the family to ensure the client is being afforded a strong program which encourages learning and independence to the highest level possible.

The Community Employment program is required by agreement with VMRC to provide transportation to participants from their homes to their job site and return trip home five days each week. While many of the participants have learned how to access public transportation, they seldom have a safe path of travel to do so. Many of the participants spend as much as 4 hours each day in a vehicle. On average there are 58 clients in the CE program; of that number 40 will require at least one-way transportation each and every work day. There is a projected 10% growth in the program each fiscal year once the COVID restrictions are lifted.

Howard Prep serves all of Stanislaus County which includes nine incorporated cities. While the county is spread across approximately 1500 square miles the primary service area would include Ceres, Modesto, Oakdale, Turlock, Waterford and the unincorporated areas bordering these cities. CDC figures from 2019 indicate that 26% of people living in the US, age 18 to 64, live with a disability; that equates 26% or 1 in every 4 adults living with a disability. 13.7% live with a physical disability and at the same time have a mobility disability. Approximately 17% of the Stanislaus County population reports having a disability. Due to the current COVID-19 restrictions of 2020/2021, on average HP provides services to approximately 80 adults with disabilities. Once the COVID restrictions are lifted that number will return to approximately 225.

HP unveiled a new website design (www.howardprep.org) in the Spring of 2020. The new web site takes advantage of advances in technology and functions on the various mobile devices the public now uses. The website has also been optimized to increase traffic to the site. There is a much greater focus on the work programs and the benefit provided to the disabled adults with the jobs they are being trained to do as they learn. The website includes a link on the homepage via which the public can access HP's **a)** Title VI Notice, **b)** Title VI complaint procedure, and **c)** Title VI complaint form, all provided in English and Spanish.

Public Rights under Title VI Notice

Howard Prep

Title VI Notice to the Public

HP is committed to ensuring that no person shall be excluded from the equal distribution of its services and amenities because of LEP, color or national origin in accordance with Title VI of the Civil Rights Act of 1964.

- HP provides services and operates programs without regard to LEP, color or national origin in full compliance with Title VI.
- Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI while using HP services may file a complaint with HP. All complaints will be fairly and objectively investigated.
- To file a complaint, you may contact our Title VI Program Administrator, Carla Strong, at (209)-538-4000 or by email: cstrong@howardprep.org; or visit HP's headquarters at **1424 Stonum Road, Modesto, CA 95351**
- **For more information about HP's Title VI program and complaint procedure, contact (209)-538-4000 or visit HP's website: www.howardprep.org**
- **A complainant may file a complaint directly with Federal Transit Administration by filing a complaint with the Title VI Program Coordinator, FTA Office of Civil Rights, East Building, 5th floor -TCR, 1200 New Jersey Avenue, S.E., Washington, DC 20590.**
- If information is needed in another language, contact (209)-538-4000.

Notice to the public in Spanish

Howard Prep

Notificar al publico de derechos en virtud del Titulo VI

Howard Prep se compromete a garantizar que ninguna persona debe ser excluida de la distribución equitativa de sus servicios e instalaciones por motivos de raza, color u origen nacional, de conformidad con el Título VI del Acta de Derechos Civiles de 1964.

- proporciona servicios y opera programas sin tener en cuenta raza, color u origen nacional en plena conformidad con el Título VI.
- Cualquier persona que cree que el o ella ha sido agraviada por cualquier practica discriminatoria ilegal bajo el Título VI durante el uso de HP servicios pueden presentar una queja ante HP. Todas las quejas seran investigadas de manera justa y objetiva.
- Para presentar una queja, puede comunicarse con nuestro Administrador de Programa del Título VI, Carla Strong, al 209-538-4000 o por correo electrónico: cstrong@howardprep.org; o visite el sitio HP's la sede en **1424 Stonum Road, Modesto, CA 95351**.
- **Para obtener mas información sobre el programa de HP Título VI y el procedimiento de queja, contacte a 209-538-4000 o visite el sitio web de HP: www.howardprep.org**
- **Un demandante puede presentar una queja directamente con la Administración Federal de Transito mediante la presentación de una queja ante el Coordinador del Programa del Título VI, FTA Office of Civil Rights, East Building, 5th floor-TCR, 1200 New Jersey Avenue, S.E., Washington, DC 20590.**

Si se necesita información en otro idioma, llame al 209-538-4000

LIST OF LOCATIONS WHERE TITLE VI NOTICE IS POSTED

Howard Prep's Title VI notice to the public is currently posted at the following locations:

Location Name	Address	City
Howard Prep: Administrative Office - Staff Bulletin Board	1424 Stonum Road Building 1	Modesto, CA
Adult Services - Staff Bulletin Board	Building 2	
Culinary Services - Staff Bulletin Board	Building 3	
Community Training Program Staff Bulletin Board	1424 Stonum Road	Modesto, CA
Production Unlimited Staff Bulletin Board	1424 Stonum Road	Modesto, CA
Interior of Buses & Vans	1424 Stonum Road	Modesto, CA

Title VI Complaint Procedures

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

The following procedures will be followed to investigate formal Title VI complaints:

- Within 10 business days of receiving the complaint, the Executive Director, who is the Title VI Program Administrator, will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter informing her/him whether 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.
- The investigation will be conducted and completed within 30 days of the receipt of the formal complaint.
- If more information is needed to resolve the case, HP may contact the complainant. The complainant has 10 business days from the date of the letter to send requested information to the Title VI Administrator investigator. If the investigator is not contacted by the complainant or does not receive the additional information within 10 business days, HP may administratively close the case.
- The complainant will be notified in writing of the cause to any planned extension to the 30-day rule.
- A case may be administratively closed also if complainant no longer wishes to pursue their case. Following the investigation, the Title VI administrator will issue one of the two letters to the complainant: 1) closure letter or 2) 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. A LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of staff member, or other action will occur.
- If the complainant is unsatisfied with the decision, he/she has 30 days after the date of HP's closure letter or LOF to appeal to the HP Board of Directors or its designee. The complainant is entitled to review the denial, to present additional information and arguments, and to separation of functions (i.e., a decision by a person not involved with the initial decision to deny eligibility). The complainant is entitled to receive written notification of the decision of the appeal and reasons for the decision.
- The complainant may also file a complaint directly with the Federal Transit Administration, as follows: Title VI Program Coordinator, FTA Office of Civil Rights, East Building, 5th floor- TCR, 1200 New Jersey Ave., S.E., Washington, C.C. 20590

Howard Prep Title VI Complaint Form

Section I: Please write legibly	
1. Name:	
2. Address:	
3. Telephone	3a. Secondary Phone (Optional)
4. Email Address:	
5. Accessible Format <input type="checkbox"/> Large Print <input type="checkbox"/> Audio Tape <input type="checkbox"/> TDD <input type="checkbox"/> Other	
Requirements?	
Section II	
6. Are you filing this complaint on your own behalf: Yes <input type="checkbox"/> * No <input type="checkbox"/>	
*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.	
Section III	
11. I believe the discrimination I experienced was based on (check all that apply): <input type="checkbox"/> LEP <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 use the back of this form.

Section IV

14. Have you previously filed a Title VI complaint with HP? 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?

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:

Telephone:

Section VI

Name of Transit Agency complaint is against:

Contact Person:

Telephone:

You may attach any written mail or other information that you thing is relevant to your complaint.

Signature: _____

Date: _____

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

Howard Prep
Title VI
1424 Stonum Road
Modesto, CA 95351

You may attach any written mail 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:

Howard Prep Title **VI**
Program Coordinator 1424
Stonum Road
Modesto, CA, 95351

Complaint Procedures in Spanish

Procedimientos de Quejas del Título VI

Cualquier persona que cree que el o ella ha sido discriminado por HP sobre la base de raza, color u origen nacional puede presentar una queja del Título VI, completando y enviando el formulario de quejas HP. HP investiga las quejas recibidas no mas tardar 180 días después del supuesto incidente. HP solo procesara las denuncias que son completos

Se seguiran las siguientes procedimientos para investigar las quejas formales del Título VI:

- Dentro de las 10 días hábiles de haber recibido la queja, el Director Ejecutivo, quien es el administrador del programa del Título VI, la revisara para determinar si nuestra oficina tiene jurisdicción. El demandante recibirá una carta de acuse de recibo informando a el/ ella ya sea para determinar si nuestra oficina tiene jurisdicción. El demandante recibirá una carta de acuse de recibo informando a el/ ella si la queja será investigada por nuestra oficina.
- La investigación se llevará a cabo y completado dentro de las 30 días siguientes a la recepción de la queja formal.
- Si se necesita más información para resolver el caso, HP puede ponerse en contacto con el demandante. El demandante tiene 10 días hábiles desde la fecha de la carta a enviar la información solicitada para el investigador Administrador Título VI. Si el investigador no está en contacto con el reclamante o no reciba la información adicional dentro de las 10 días hábiles, HP puede cerrar administrativamente el caso.
- El denunciante será notificado por escrito de la causa a cualquier ampliación prevista de la norma de las 30 días.
- Un caso puede ser cerrado administrativamente también si la queja ya no desea seguir su caso. Tras la investigación, el administrador del Título VI emitirá una de las dos cartas al demandante: 1) carta de cierre o 2) una carta de encontrar (LOF). Una carta de conclusión resume los hechos denunciados, y afirma que no hubo una violación del Título VI, y que el caso se cerrará. Un LOF resume los hechos denunciados y las entrevistas sobre el supuesto incidente, y explica si y explica si alguna acción disciplinaria, la formación adicional de miembro del personal, u otra acción ocurrirá.
- Si el demandante no está satisfecho con la decisión que el/ ella tiene 30 días después de la fecha de la carta de cierre de HP o LOF de apelar a la Junta de HP de Administración o su representante. El denunciante tiene derecho a revisar la negación, para presentar información y argumentos adicionales, y para la separación de funciones (es decir, una decisión de una persona no involucrada con la decisión inicial de negar la elegibilidad). El demandante tiene derecho a recibir una notificación por escrito de la decisión de la apelación y los motivos de la decisión.
- El demandante también puede presentar una queja directamente con la Administración Federal de Tránsito, de la siguiente manera: Title VI Program Coordinator, FTA Office of Civil Rights, East Building, 5th floor - TCR, 1200 New Jersey Ave., NW, Washington, C.C. 20590

Howard Prep Formulario de queja del Título VI

Sección I: Por favor, escriba de manera legible		
I. Nombre:		
2. Dirección:		
3. Telefono:	3.a. Telefono Secundario (Opcional):	
4. Dirección de correo electrónico:		
5. Requisitos formato accesible?	<input type="checkbox"/> Letra Grande	<input type="checkbox"/> Cinta de audio
	<input type="checkbox"/> TDD	<input type="checkbox"/> Otro
Sección II:		
6. ¿Esta su presentación esta queja en su propio nombre?	sf*	NO
* Si usted contestó "sf" a# 6, vaya a la Sección III.		
7. Si su respuesta es "no" a la# 6, ¿Cual es el nombre de la persona para la cual usted esta presentando esta queja?		
Nombre:		
8. ¿Cual es su relación con esta persona?:		
9. Par favor, explique par que usted ha presentado para 1111 tercero:		

I 0. Por favor, confirme que ha obtenido el permiso de la
pmie agraviada para presentar en su nombre.

SI*

NO

Sección III:

11. Creo que la discriminación que experimente fue basada en (marque todo lo que correspond a):

☐ Carrera

☐ Color

☐ Origen Nacional

12. Fecha de la supuesta discriminación: (mm/ dd / yyyy)

13. Explique lo mas claramente posible lo que pasó y por que cree que fue discriminado. Describir todas las personas que estuvieron involucradas. Incluya el nombre y la información de contacto de la persona (s) que lo discriminó (si se conoce), así como los nombres y la información de los testigos en contacto. Sise necesita mas espacio, por favor use el reverso de este formulario.

Sección IV:

14. ¿Ha presentado anteriormente una queja de! Título
VI con [AGENCIA]?

SI*

NO

Sección V:

15. ¿Ha presentado esta queja con cualquier otro federal, estatal o local, o ante cualquier tribunal federal o estatal?

☐ SI* ☐ NO

En caso afirmativo, marque todo lo que corresponda:

☐ Agencia Federal _____

☐ Agencia Estatal _____

☐ Tribunal Federal _____

☐ Agencia Local _____

☐ Tribunal Estatal _____

16. Si usted contestó "si" a la # 15, proporcionar información acerca de una persona de contacto en la agencia / tribunal donde se presentó la queja.

Nombre:

Título:

Agencia:

Dirección:

Teléfono:

Email:

Sección VI

Nombre de la Agencia de Tránsito queja es en contra:

Persona de contacto:

Teléfono:

Puede adjuntar cualquier material escrito o cualquier otra información que usted considere relevante para su queja.

Firma y fecha están obligados a continuación para completar el formulario:

Firma: _____

Fecha: _____

Por favor envíe este formulario en persona o por correo este formulario a la siguiente dirección:

Howard Prep Title VI Program Coordinator 1424 Stonum
Road
Modesto, CA 95351

HOWARD PREP

LIST OF TRANSIT-RELATED TITLE VI INVESTIGATIONS, COMPLAINTS, AND
LAWSUITS

	Date (Month, Day, Year)	Summary (include basis of complaint: LEP , color, or national origin)	Status	Action (s) Taken
Investigations				
1.	None			
2.				
Lawsuits				
1.	None			
2.				
Complaints				
1.	None			
2.				

NOTE: This list shall be included in the Title VI Program submitted to FTA every three years.

PUBLIC PARTICIPATION PLAN

OUT REACHPROCEDURE

HP continually strives to inform the community about our many services and programs including Culinary Services, via staff outreach, brochures and other marketing materials, our website (www.howardprep.org), and our community fundraising events.

Annual fundraisers include: 27nd Annual Crab Fest in February 2020; McNulty Raffle Ticket Sales. In addition, at our large event we contract with a professional auction company to hold silent auctions while we also conduct raffles.

HP benefits from additional outreach when the Executive Director and staff act as guest speakers for various service clubs in the area as well as hosting tours of the facility. Witmer Hall is a 425-person capacity hall which can be leased for events. In addition to contract catering for 4 mental health facilities, off-site catering events add to our outreach. All these efforts bring the public to HP, promote awareness of the challenges our clients face in their daily lives and the benefit our programs have provided for over 67 years.

Valley Mountain Regional Center in Modesto is the government agency tasked with referring participants to HP programs. VRMC, and HP work closely with clients and their families to ensure our person-centered programs fit the needs of the clients, building their confidence while they learn to manage their disability. Since we only receive clients by referral from VRMC, HP does not have a formal LEP outreach procedure. The Social Workers, Case Coordinators at VMRC and several HP staff are bilingual in Spanish for when the need arises. However, when and if the need arises for an LEP outreach program Howard Prep will develop a process to accommodate the needs of our clients as outlined below.

Howard Prep's
Adult Day Programs Job Skills Training*
*Residential Programs * & Catering*

Language Assistance Plan

Adopted: February 17, 2016
Revised: March 5, 2021

INTRODUCTION

The Limited English Proficiency Plan has been prepared to address Howard Prep's responsibilities as a recipient of federal financial assistance as relates to the needs of individuals with limited English proficiency. The plan has been prepared in accordance with the Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq., and its implementing regulations, which state that no person shall be subjected to discrimination on the basis of LEP, color or nation origin.

Title VI of the 1964 Civil Rights Act prohibits federally-funded agencies from discriminating against individuals based on race, color, and national origin and includes meaningful access to LEP customers.

Presidential Executive Order 13166, titled Improving **Access to Services for Persons with Limited English Proficiency**, indicates 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 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 which receive federal funds, including Howard Prep programs.

Howard Preps' Title VI Program Administrator is:

Carla Strong, Executive Director 209-538-4000
Howard Prep
1424 Stonum Road cstrong@howardprep.org
Modesto, CA 95351

More information about HP's Title VI Program is available at: www.howardprep.org

Plan Summary

Howard Prep has developed this Limited English Proficiency Plan to identify reasonable steps for providing language assistance to persons with limited English proficiency (LEP) who wish to access services provided. As defined by Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write or understand English. This plan outlines how to identify who may need language assistance, the ways 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, Howard Prep used the four-factor LEP analysis which considers the following factors:

1. The number or proportion of LEP persons in the service area of Stanislaus County who may be served by the Howard Prep.

2. The frequency with which LEP persons come in contact with Howard Prep services.
3. The nature and importance of services provided by the Howard Prep to the LEP population.
4. The interpretation services available to the Howard Prep and overall cost to provide LEP assistance. A summary of the results of the four-factor is in the following section.

MEANINGFUL ACCESS: FOUR-FACTOR ANALYSIS

1. The numbers of proportion of LEP persons in the service area who may be served or are likely to require Howard Prep services.

Language	Percentage	Population Count
Speak English Only	37.1%	183,001
Speak Spanish Only	22.2%	109,733

The 2010 census identifies the two major language groups in Stanislaus County as English and Spanish, with approximately 37.1% of the population identified as English speaking only, and 22.2% identified as speaking Spanish only. All other LEPs combined equal approximately 10% of the population, with Asian and Pacific Island languages totaling approximately 2.3%.

Given these demographics the most likely language need at HP would be English or Spanish.

2. The frequency with which LEP persons come in contact with Howard Prep services.

Consistent with the data for the area, LEP persons who do not speak either English or Spanish would not be the most likely to request services from HP. Since we operate in conjunction with VMRC, those LEP persons rarely come in contact with the Howard Prep directly. During the past year, there have been **no** requests for translation services that HP staff has not been able to provide. HP currently has 11 members of our staff who speak Spanish.

3. The nature and importance of services provided by the Howard Prep to the LEP population.

HP's mission is to achieve full inclusion of individuals with disabilities in the community through the development of personal and occupation capabilities, the development and delivery of educational programs, providing services and community advocacy, and lending support to individuals so they may hold a meaningful place in the community to the fullest extent of their abilities.

HP provides three Community Care Licensed day programs designed to meet the interest and needs of a diverse adult community with disabilities. All programs emphasize communication, social skills training and behavioral supports. All programs are person centered and highly individualized.

Enclaves, the small community-based employment groups, operate with supervision providing employment opportunities in a wide range of jobs including landscape/custodial, food service, retail shipping/receiving, order picking and warehouse maintenance.

Production Unlimited (PU) operates as a traditional sheltered workshop providing opportunities to develop and improve work habits, skills, and productivity. ARC Catering (FS) is a

nontraditional sheltered workshop providing opportunities to develop and improve work habits, skills, and productivity in food service. Individual Placement provides long term, community-based employment. Employment opportunities are dependent on individual interests and positions available in the community. All these programs are vitally important to our mission of lending support to individuals with disabilities so they may hold a meaningful place in the community to the fullest extent of their abilities.

4. The resources available to the Howard Prep and overall cost to provide LEP assistance.

HP employs 11 staff members who are available for Spanish speaking individuals. All clients are referred to HP from VMRC therefore; individuals speaking languages other than Spanish in our area would initially go directly to VMRC. As a government agency VMRC would assist those clients with a translator when the need arises. In addition to the Case Coordinators at VMRC, HP makes use of our employees who are Spanish speaking for translation services.

For persons who are hearing impaired or disabled, HP directs anyone who needs service to use the free California Relay Service (711).

VMRC Case Coordinators are active during the enrollment process when assisting an LEP person. Those individuals who speak languages other than English or Spanish in our service area would be referred to VMRC who would assist with a translator.

There is no cost for these services.

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 these 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."

HP will provide vital documents to include Title VI Instructions, Title VI Complaint Form, and Enrollment Forms in English and Spanish. There are no other vital documents that are maintained by HP. All assessment and referral packets are generated by the Valley Mountain Regional Center. Individuals receiving services and their family members may request translated documents directly from Valley Mountain Regional Center Service Coordinator.

LANGUAGE ASSISTANCE

A person who does not speak English as their primary language and who has a limited ability to read, write, speak, or understand English may be a Limited English Proficient person and may be entitled to language assistance with respect to Howard Prep services. Language assistance can include interpretation, which means oral or spoken transfer of a message from one language into another language and/or translation, which means the written transfer of a message from one language into another language.

LANGUAGE ASSISTANCE MEASURES

HP is committed to making its services and programs available to LEP persons and to continue with the following practices:

- An LEP person interested in becoming a participant is almost always accompanied by a family member or friend who provides language assistance. In the event this is not the case, Spanish speaking HP staff will assist. In addition, the staff of VMRC is always involved as part of the enrollment team and remains directly involved during the entire time a client is part of an HP program. Individuals speaking languages other than English or Spanish will be referred back to VMRC for assistance.
- HP enrollment or program staff will note the need for language assistance on the in-take form, and program staff will report other encounters in the monthly report. Using monthly reports from the Case Managers, the Title VI Administrator will analyze annually the number of LEP encounters to evaluate HP's interpretation/translation needs and services.
- HP will post the Title VI Notice and the Complaint Procedures and forms in English and Spanish on the agency website, www.howardtrainingcenter.com, and post the availability of

translators in the locations where staff and volunteers are most likely to encounter LEP persons.

- The HP website home page offers Google Translate for Spanish speaking individuals.
- Instructions for callers who want to use the Language Line or the California Relay service are posted on the HP website.
- The HP staff most likely to encounter LEP persons will be trained on using these resources.

LANGUAGE ASSISTANCE MEASURES

1. Howard Prep employees take reasonable steps to provide the opportunity for meaningful access to LEP clients who have difficulty communicating English.
2. The following resources are available to accommodate LEP persons:
 - a. HP has posted notice of Title VI Policy Statement and Complaint Procedures on the agency website, www.howardtrainingcenter.com, and post the availability of interpretation or translation services free of charge in the locations where staff and volunteers are most likely to encounter **LEP** persons (notices in English only).
 - b. Copies of the Policy Statement and Complaint Procedures in both English and Spanish can also be obtained at 1424 Stonum Road, Modesto, CA 95351.

STAFF TRAINING

The staff most likely to encounter LEP individuals who participate, or are interested participating in the programs, and their family members or caregivers has been identified as:

- The receptionists 1424 Stonum Road, Modesto, CA 95351
- The case coordinators
- The drivers of busses and vans
- Staff members who participate in outreach outside the agency

These interactions may take place on the phone or in person, in transit, or on job sites.

Because any HP staff member may encounter LEP individuals, training is be provided to all upon hire and is reviewed annually. The training will include:

- Information on the Title VI Policy and LEP responsibilities.
- Description of language assistance services offered to the public.
- How to handle a potential Title VI/LEP complaint.
- Documentation of language assistance requests and complaints.

MONITORING

Howard Prep (HP)
Title VI Program

Monitoring and Updating the LEP Plan - HP reviews and updates the LEP Plan every three years, at a minimum, or as requested when data from the Census is available that demonstrates higher concentrations of LEP individuals are present in the HP service area. Updates include the following:

- How the needs of LEP persons have been addressed.
- Determination of the amount of LEP population in the service area.
- Determination whether the need for translation services has changed.
- The Title VI complaint log.

DISSEMINATION OF THE HP LEP PLAN

A link to the Howard Prep LEP Plan and the Title VI Procedures is included on the HP's website, www.howardprep.org and copies can also be obtained at 1424 Stonum Road, Modesto, CA 95351.

Any person or agency with internet access is able to access and download the plan from the Howard Prep's website in both English and Spanish. Alternatively, any person or agency may request a copy of the plan via email, telephone, fax, mail, or in person and shall be provided a copy of the plan at no cost.

Questions or comments regarding the LEP Plan may be submitted to:

Title VI Administrator

Howard Prep

1424 Stonum Road

Modesto, CA 95351

Main: 209-538-4000

Fax: 209-538-6406

Email: cstrong@howardprep.org

Board Resolution

Board of Directors Approval of Howard Preps (HP) Title VI Program

A RESOLUTION OF THE HP BOARD OF DIRECTORS AUTHORIZING THE TITLE VI COMPLIANCE PLAN FOR THE AGENCY

WHEREAS, HP 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.IB, "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 provisions of the Civil Rights Act,

NOW, THEREFORE BE IT RESOLVED, by the Board of Directors of HP as follows:

The Executive Director is authorized to implement the components of the plan in order to meet Federal Requirements.

The Executive Director is authorized to implement policies that may be necessary to comply with subsequent revisions of interpretations to the Civil Rights Act.

PASSED AND ADOPTED by the Board of Directors of HP, State of California, on March 5, 2021



Jo Anne Mooney, Board President



California Relay Service (CRS) for the deaf and disabled.

For help communicating with people who have limitations **in** hearing or speaking, a specially-trained Communications Assistant (CA) can relay telephone conversations for all of your calls. This is a free service to aid Californians who are deaf or disabled and available during **HP** business hours.

Dial 711 to reach the California Relay Service (CRS). Dialing 711 is for everyone, not just those who have difficulty hearing on a standard telephone. Friends, family, and business contacts can dial 711 for relay calls, too.

If the person prefers having the calls immediately answered in their mode of communication, they should dial one of the toll-free modalities- and language-specific numbers below. The call will be routed to the CRS provider.

Type of Call	Language	Toll-free 800 Number
TTYNCO/HCO to Voice	English	1-800-735-2929
	Spanish	1-800-855-3000
Voice to TTYNCOIHCO	English	1-800-735-2922
	Spanish	1-800-855-3000
From or to Speech-to- Speech	English & Spanish	1-800-854-7784

Federal regulations specify very strict confidentiality requirements for CAs of all relay services. No part of the conversation that takes place between callers is revealed or recorded in written, verbal, or any other form. CRS CAs do not participate in the conversation and acquire no benefit from information relayed.

For more information on how to place a call, visit the California Relay Website:

