



VILLA ESPERANZA SERVICES

*Where Hope is Hard at Work for Individuals
with Intellectual/Developmental Disabilities*

TITLE VI PROGRAM

Developed: October 22, 2018

**Approved by the Villa Esperanza Services Board of Directors:
November 19, 2018**

**2116 E Villa St Pasadena California 91107
626.449.2919**

WWW.VillaEsperanzaServices.org

This program has been prepared by Villa Esperanza Services in accordance with Section 601 of Title VI of the Civil Rights Act of 1964 and Executive Order 13116 (Improving Access to Services for Persons with Limited English Proficiency).

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Introduction

Your Agency's Commitment to Civil Rights

Villa Esperanza Services (VES or Villa) is a thriving multi-service non-profit agency that provides programs and services for individuals with intellectual/developmental disabilities (I/DD). We offer the tools and support necessary for children, adults, and seniors with special needs to achieve their goals, live fulfilling lives, and embrace a sense of belonging and acceptance.

Our organization serves over 750 individuals diagnosed with I/DD including more than 30 different disabilities. Villa offers a continuum of care that includes early intervention services for infants and toddlers, special education for children age 5 to 22, and a wide variety of adult and senior services. These services include employment programs, day programs, and residential programs.

Since Villa was founded in 1961, we have been true to our mission of "Providing Love, Care, and Hope for Individuals with Intellectual/Developmental Disabilities and their Families." Our culture is immersed in the core values of Integrity, Courage, Respect, Innovation, and Perseverance. We are committed to our leadership role in offering progressive and innovative services by forecasting the needs of the individuals we serve throughout the course of their lifetimes.

Villa recently became a recipient of federal funds and takes measures to adhere to Title VI of the Civil Rights Act of 1964. This act prohibits discrimination on the basis of race, color, and national origin in programs and services receiving federal financial assistance. In all circumstances services at VES are provided in a nondiscriminatory manner and the opportunity for full and fair participation is offered to both the people we serve and to other community members. In addition, Villa has examined the need for services and materials for persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. In order to do this we have relied on census data as well as our own internal demographic reports that gather information on persons served at the time of intake.

General Requirements

Notice to the Public

Notifying the Public of Rights Under Title VI

Villa Esperanza Services

Villa Esperanza 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 Villa Esperanza Services.

For more information on Villa Esperanza Services civil rights program, and the procedures to file a complaint, contact Villa Esperanza Services at (626) 449-2919, or visit our administrative office at 2116 E Villa St. Pasadena California 91107. For more information, visit:
WWW.VillaEsperanzaServices.org

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 (626) 449-2919

Notificar al público de los derechos bajo el título VI

Villa Esperanza Services

- Villa Esperanza Services 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 **Villa Esperanza Services**
- 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 **2116 E. Villa Street Pasadena CA 91107**. Para más información, visite www.villaesperanzaservices.org
- Un demandante puede presentar una queja directamente con el Federal Transit Administration por archivar una queja con la Office of Civil Rights, Atención: 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 (626) 449 2919

List of Locations Where Title VI Notice Is Posted

Villa Esperanza Services notice to the public is currently posted at the following locations:

Location Name	Address	City
Villa Esperanza Services Adult Day Program	1757 N. Lake Ave	Pasadena
Dimensions Adult Day Program	1990 E. Walnut St.	Pasadena
In each Metro vehicle	1757 N. Lake Ave and 1990 E. Walnut St.	Pasadena Pasadena
Villa headquarters	2116 E Villa St	Pasadena

The Title VI notice and program information is also provided on Villa Esperanza Services website at www.VillaEsperanzaServices.org

Discrimination Complaint Procedures

As a sub recipient of federal dollars, Villa Esperanza 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. Villa Esperanza Services 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 Villa Esperanza Services may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form. Villa Esperanza Services investigates complaints received no more than 180 days after the alleged incident. Villa Esperanza Services will only process complaints that are complete.

Within 10 business days of receiving the complaint, Villa Esperanza 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. Villa Esperanza 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, Villa Esperanza 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 Villa Esperanza 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. A 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

The Title VI Complaint Procedures and Complaint Form are available at our administrative offices and on our website: www.villaesperanzaservices.org

Discrimination Complaint Form

Villa Esperanza Services 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 Origin	<input type="checkbox"/> Color	<input type="checkbox"/> National
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.		

COMPLAINT FORM

Section IV:		
14. Have you previously filed a Title VI complaint with Villa Esperanza Services?	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: _____ 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:
 Vicky Castillo, Title VI Coordinator
 2116 E. Villa St.
 Pasadena California, 91107

Active Lawsuits, Complaints or Inquiries Alleging Discrimination

As of the writing of this program, there are no open/active transit-related Title VI investigations.

Type (Investigation, Lawsuit, Complaint)	Date	Summary of Complaint	Status	Action(s) Taken

PUBLIC PARTICIPATION PLAN

About - Villa Esperanza Services

Villa Esperanza Services is a non-profit 501 c (3) organization that provides training and employment services to children, adults, and seniors with disabilities. The agency is licensed by the State of California Health and Human Services Department, Social Services Community Care Licensing Division. Services for the program are purchased by regional centers and/or school districts that refer eligible individuals to enroll in the program. Regional centers and/or school districts are the sole referral agencies for Villa Esperanza Services. The program does not serve the general public but rather a population of children, adults, and seniors with developmental disabilities that is first served by regional centers/school districts and is then referred to Villa Esperanza Services. As such, the program works in conjunction with regional centers/school districts and other agencies to achieve various outreach opportunities.

All of the individuals we support have developmental disabilities and typically range from the mild/moderate to severe level of functioning. While it is beyond the scope of this program to measure specific literacy skills, participants generally require a high level of supervision and have little to no literacy skills. Generally, any documents presented to participants are translated orally due to the level of intellectual disability. Additionally, participants have not mastered basic work skills and are unable to earn an income. Currently, 90% of the individuals we support receive SSI benefits, which are largely determined by limited resources and income.

The programs curriculum includes training in the areas of social skills, self-advocacy, vocational skills, personal health and safety, technology, cognitive skills, community integration, and recreation. The program provides limited transportation and conducts daily community integration trips with various individuals we support. Villa Esperanza Services provides an estimated 221 clients with moderate to severe I/DD transportation services. Given the relatively small size of the program and its limited exposure, the scope and provision of transportation service would have insignificant impact on the general public and minority and low-income populations in the geographic area. This agency, however, does maintain systems to gather stakeholder input regarding agency services and conducts public relations and outreach activities in order to create meaningful opportunities for public engagement as outlined below.

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. This agency endeavors to improve the lives of people with disabilities by creating opportunities to maximize their independence.

Villa Esperanza Services - Summary of Outreach Efforts

The following is a summary of outreach efforts conducted by Villa Esperanza Services 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

Villa Esperanza Services monthly Board meetings are open to the public and announced on the agency's website.

Regional Center Transition Fair

Villa Esperanza Services participates annually in multiple Regional Center Transition Fairs. These events are designed to connect families of children with disabilities who are preparing to leave school and enter adulthood to service providers and training programs such as employment programs, community integration programs, and adult day programs. The event typically attracts 75-100 guests and is translated in Spanish with a live interpreter in order to reach Limited English Proficient individuals.

Service Clubs

Several members of the Villa Esperanza Services staff maintain membership with the Kiwanis Club, Rotary Club, Civitan Club, and Lions Club.

Villa Esperanza Services Annual Open House

Villa Esperanza Services hosts an Open House and information seminars annually for program participants and members of the community. These are public events promoted through Villa's various social media outlets and also serve as a forum for public input. These events typically attract 100 plus guests.

Annual Satisfaction Surveys

Villa Esperanza Services conducts Annual Satisfaction Surveys with program participants and stakeholders of the agency to determine level of satisfaction and gain input regarding unmet needs.

Villa Esperanza Services Website

Currently, Villa Esperanza Services posts notices and announcements on the agency's website. We also use social media accounts to publish information (Facebook, Twitter, Instagram). Additional public input can be obtained by the Title VI Complaint Form, which is available as a download. The agency also maintains a Public Relations Committee that meets seven times per year and sets annual marketing and outreach goals. The Committee conducts various comprehensive outreach activities throughout the year including public engagements, newsletters, open houses, and press releases. Additionally, on an annual basis the agency develops a comprehensive Strategic Marketing Plan.

LANGUAGE ASSISTANCE PLAN

Purpose of the Language Assistance Plan

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

Executive Order 13166, titled "Improving Access to Services for Persons with Limited English Proficiency," forbids funding recipients from "restricting an individual in any way in the enjoyment of any advantage or privilege enjoyed by others receiving any service, financial aid, or other benefit under the program," or from "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. Villa Esperanza Services language assistance plan (LAP) includes two sections. The first section consists of a four factor analysis and implementation plan that complies with the requirements of DOT LEP guidance. The second section of this document discusses the results of the Four-Factor Analysis and the implementation of the Language Assistance Plan.

Improving Access for People with Limited English Proficiency:

In order to ensure meaningful access to programs and activities, Villa Esperanza Services uses the information obtained in a Four Factor Analysis to determine the specific language services that are appropriate. This analysis helps Villa Esperanza Services to determine if it communicates effectively with LEP persons and informs language access planning.

The **Four Factor Analysis** is a local assessment that considers:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by Your Agency's Program;
2. The frequency with which LEP persons come into contact with Your Agency's Program;
3. The nature and importance of Your Agency's Program in people's lives; and

4. The resources available to Your Agency’s Program for LEP outreach, as well as the costs associated with that outreach.

Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by Villa Esperanza Services.

Villa Esperanza Services holds a unique position in regard to meeting the Title VI requirements. As a sub-recipient of FTA 5310 Grant funding, the agency's focus is primarily to transport adults with I/DD where current public transit options are insufficient or do not exist. Eligible program participants or "riders" must be referred into the program. As such, Villa Esperanza 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 Los Angeles County does not represent actual populations served by this program but is offered for comparison purposes only.

There are two sources of data that most accurately represent LEP persons likely to be served by the program. The Purchase of Service Expenditure and Demographic Data for fiscal year 2017/2018 shows purchase of service (POS) authorizations, expenditures and utilization by different demographic categories including language. Villa Esperanza Services receives case histories of each program participant and maintains a database of information. A historical analysis of this database in regard to language proficiency of all past and present participants will reflect actual proportions of LEP persons served.

American Community Survey

To determine this number, Villa referred to demographic information provided by the U.S. Census Bureau. Data from the Census Bureau’s Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over report from 2011-2015 -- American Community Survey 5-Year Estimates. This report indicates that the population of the City of Pasadena, zip code 91107, above 5 years of age is 29,845. From this total, residents were divided by language into those who can speak English “very well” or “less than very well.” For the purposes of determining the number of LEP persons eligible to be served by Villa Esperanza Services, this analysis focuses on those who speak English “less than very well,” in accordance with the normal definition of LEP persons from the FTA. The analysis results showed that of the various languages spoken in Pasadena (91107), two languages had over 1,000 speakers who could speak English “less than very well,” thus falling under the FTA’s “Safe Harbor Provision” threshold. Based on the results from the American Community Survey, the languages of Spanish and Chinese meet the LEP “Safe Harbor” threshold, as shown in the table below:

Total Population for Villa Headquarters (91107) 5 Years and Older		29,845	
LEP “Safe Harbor” Threshold Languages	Total	Speaks English “Less Than Very Well”	Percentage of Total Population
Spanish or Spanish Creole	5,104	1,836	.06%
Chinese	2,264	1,234	.04%

Regional Center (RC) Expenditures

The RC Purchase of Service and Demographic Data Report for Fiscal Year 2016/2017 identifies total annual expenditures and authorized services purchased. The report shows expenditures for services by primary language spoken but does not ascertain whether English is spoken "very well" or “less than very well.” As indicated in the Pasadena analysis above, Spanish is consistently the primary language for LEP populations. The report further breaks down by age group for ages

22 and older. Villa Esperanza Services would be included in this category as a provider of services that are purchased by regional centers.

The report indicates that authorized services FY 2016/2017 totaled approximately \$4.6 billion. Of that total, 201,924 individuals, or 75.47%, of the people served spoke English while 65,629 individuals, or 24.53%, spoke Spanish as their primary language. The data does not allow the reader to determine if the person speaks English "less than very well"

In an analysis of the people Villa Esperanza Serves, it was noted that the majority self-identify as Caucasian and English speaking while none identify as speaking English "less than very well." Additionally, individuals in this program who speak English or any other language "less than very well" have intellectual / developmental disabilities that cause barriers to speech or other forms of communication. As a result, Limited English Proficiency is not typically present in this population solely due to a language barrier. Thus, translation of vital documents into a native language is generally ineffective.

An examination of individuals who have exited the program reveals that the individual exited primarily for reasons such as ineligibility because of their level of disability, successful transition to higher programs, or other factors such as insufficient or non-existent transportation options. There were no clients that were underserved or exited the program due to language barriers.

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

As indicated above, historically, contact with LEP individuals has not occurred in this program. However, a recent survey of the agency's Transportation Department indicated that calls from parents or caregivers (not of our actual clients) of persons served whose primary language is Spanish occurs 3-4 times per week. The transportation department does not report receiving phone calls where the individual speaks a language other than English or Spanish.

Annual individual and care provider surveys provide an opportunity for input and suggested services. Surveys have not contained requests for translation services. Translation services are provided by agency staff as appropriate and, at times, by staff during client planning meetings. Again, the majority of translation occurs with family members, not the individuals we support who directly access transportation services.

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

The primary purpose of the Villa Esperanza Services program is to provide training opportunities that foster personal growth for individuals with disabilities. Transportation during Community Integration training is offered daily as a part of the service in addition to limited transportation to/from the program. Annual client surveys indicate that transportation for Community Integration activities is an important part of the services offered to the individuals we support. Villa Esperanza Services serves approximately 150 individuals in this way. The length of time an individual is typically enrolled in the program can range from a few months to many years. The individuals we support are not required to "graduate" and may remain in the program as long as their needs can continue to be met.

While the Villa Esperanza Services transportation program is relatively small and is not an "essential" program, it does create opportunities that can enhance the quality of life for adults with disabilities.

Factor 4: The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach.

The Villa Esperanza Services operating budget does not have a specific line item for providing language access and outreach. Outreach expenses as they relate to LEP populations are split among several departments depending on which

department is responsible for the outreach. Costs for translation of documents are minimal and has not been quantified. The majorities of larger expenses are allocated to the annual Open House/ information seminars and print/email marketing. Significant outreach budget allocations for the entire agency this fiscal year include but are not limited to:

- Redesign of agency web page: \$6,000
- Ads in local publications and email blasts: \$4,000
- Annual Open House/ information seminars: \$2,000

The budget for outreach as noted above, is a small fraction of the agency's operating budget. The total annual expenditures for this is approximately \$12,000 out of an approximate annual budget of \$14 million. The rates for purchase of service that Villa Esperanza Services receives from RC as its sole source of service revenue was originally set in 1998. These rates, with minimal exceptions and or pass through funds, were set with the cost-of-living index from 1998 and have not increased since that time, while the cost of living has continued to rise. In fact, rates, and subsequently the program's revenue, were reduced for a number of years by up to 4.25%, further compounding the effects of a rate system that has not grown with the economy. Several cost-cutting measures have been implemented in order to remain financially solvent, including areas such as advertising and outreach.

SUMMARY

The results of the Four Factor Analysis can be summarized with the following points:

- Language proficiency is primarily affected by disability rather than a language barrier alone.
- No individuals were underserved or exited the program due to language barriers.
- Surveyed Agency staff reported 3-4 LEP phone calls per week.
- Surveyed staff reported never receiving LEP phone calls from our clients, however there are calls received from our client's family members or caregivers. With existing staff we have been able to accommodate those individuals (we have staff who are fluent in their spoken language).
- Provision of transit is not considered an "essential" service but is a component of the Villa Esperanza Services program.
- Villa Esperanza Services does not have an LEP specific budget line.
- Villa Esperanza Services spends approximately \$12,000 per year on all outreach efforts.
- Daily revenue rate for program services is 3 years old with no cost-of-living adjustment.

DECISION MAKING BODIES

It is important that the people empowered to make decisions on behalf of the agency represent the communities we serve. As such, Villa has included a goal in its strategic plan to address this need. The goal states that we will:

Increase Board and Organizational Diversity and Capacity: Villa’s Board of Directors is committed to our mission and its members are the driving force behind our organizational fundraising. In addition to sharing their expertise, all 21 members contribute financially to support Villa. Our Board also includes a client member who provides a voice for her peers and shares her unique perspective as a recipient of the services Villa provides. Board members come to Villa with diverse backgrounds and broad areas of expertise. Many potential members are cultivated through service on Villa's key steering and fundraising committees. We forecast upcoming needs to balance and strengthen the makeup of our Board. Members are extremely proactive and engaged, continually strategizing ways to broaden our donor base by inviting friends and colleagues to volunteer, participate in fundraising events, or tour our classrooms and programs. They are vocal and passionate advocates for Villa, sharing the impact that our services have on the I/DD population as well as the local communities.

Here is a chart outlining the demographic profile of Villa’s current Board of Directors:

Body	Caucasian	Latino	African American	Asian American	Native American	Other
Board of Directors	14	3	0	4	0	0

In addition, Villa utilizes community members with specific expertise who sit on committees and provide valuable insight towards our operational priorities. The following is a chart of the demographic categories for those individuals:

Body	Caucasian	Latino	African American	Asian American	Native American	Other
Community Members	19	2	1	5	0	0

PROGRAM SPECIFIC REQUIREMENTS

- Villa Esperanza Services does not meet the requirements for any service outlined in this section.

CONTACT

For additional information on Villa Esperanza Services Title VI Plan, or its efforts to comply with the Civil Rights Act of 1964 or Executive Order 13166 Improving Access to Services for Persons with Limited English Proficiency, please contact:

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