

Pace Solano

TITLE VI PROGRAM

Developed: June 2014

Revised: November 2020

Approved by Pace Solano Board of Directors

Pace Solano

419 Mason Street, Suite 118

Vacaville, CA 95688

Phone (707) 448-2283

www.pacesolano.org

INTRODUCTION

This document was prepared by Pace Solano and approved by its Board of Directors to comply with Title VI of the Civil Rights Act of 1964; including new provisions detailed in the U.S. Department of Transportation's FTA Circular 4702.1B "Title VI Requirement and Guidelines for Federal Transit Administration Recipients."

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Pace Solano Title VI Notice to the Public

Notifying the Public of Rights Under Title VI

Pace Solano

- Pace Solano operates its programs and services without regard to race, color, and national origin in accordance with Title VI and 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 Pace Solano.
- For more information on Pace Solano's civil rights program, and the procedures to file a complaint, contact (707) 448-2283, or visit our administrative office at 419 Mason Street, Suite 118, Vacaville, CA 95688. For more information, visit www.pacesolano.org
- A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with:
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 (707) 448-2283.

Notificación al Público de los Derechos Bajo el Título VI

Pace Solano

- Pace Solano opera sus programas y servicios sin tener en cuenta raza, color y origen nacional, de conformidad con el Título VI y la Ley de Derechos Civiles. Cualquier persona que cree que él o ella ha sido agraviada por cualquier proactiva discriminatoria ilegal bajo el Título VI puede presentar una queja ante Pace Solano.
- Para más información sobre el programa de derechos civiles de Pace Solano, y los procedimientos para presentar una queja, Contacto (707) 448-2283, o visite nuestra oficina administrativa en 419 Mason Street, Suite 118, Vacaville, CA 95688. Para obtener más información, visite www.pacesolano.org
- Un demandante puede presentar una queja directamente con la Administración Federal de Tránsito mediante la presentación de una queja ante:
Oficina de Derechos Civiles
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, el contacto (707) 448-2283.

List of Locations Where Title VI Notice Is Posted

Pace Solano notice to the public is currently posted at the following locations:

Location Name	Address	City
Pace Solano Main Office	419 Mason Street, #118	Vacaville, CA
Pace Parkway	950 Mason Street	Vacaville, CA
Pace Vacaville	848-A Alamo Drive	Vacaville, CA
Pace Winery Square	1955 West Texas Street, #190	Fairfield, CA
Pace Fairfield	350 Chadbourne Road	Fairfield, CA
Pace Benicia	425-E Military East	Benicia, CA
Pace Georgia	1330 Georgia Street	Vallejo, CA
Website	www.pacesolano.org	

The Title VI notice and program information is also provided on the Pace Solano website at:
www.pacesolano.org

Title VI Complaint Procedures

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

Within 10 business days of receiving the complaint, Pace Solano 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. Pace Solano 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, Pace Solano may contact the complainant. The complainant has 10 business days from the date of the letter to send the 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 Pace Solano 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 Civil Rights Division, Attention Complaint Team, East Building 5th Floor, 1200 New Jersey Avenue SE, Washington, DC 20590.

Pace Solano Title VI Complaint Form

COMPLAINT FORM

Section I: Please write legibly		
1. Name:		
2. Address		
3. Telephone	3.a. Secondary Phone (Optional)	
4. Email Address:		
5. Accessible Format Requirements?	<input type="checkbox"/> Large Print	<input type="checkbox"/> Audio Tape
	<input type="checkbox"/> TDD	<input type="checkbox"/> Other
Section II:		
6. Are you filing this complaint on your own behalf?	YES*	NO
*If you answered "yes" to #6, go to Section III		
7. If you answered "no" to #6, what is the name of the person for whom you are filing this complaint? Name:		
8. What is your relationship with this individual:		
9. Please explain why you have filed for a third party:		
10. Please confirm that you have obtained permission of the aggrieved party to file on their behalf.	YES	NO
Section III:		
11. I believe the discrimination I experienced was based on (check all that apply) <input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin		
Date of alleged discrimination: (mm/dd/yyyy)		
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.		

Pace Solano Title VI Complaint Form, Page 2

COMPLAINT FORM

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

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

Signature and date are required below to complete form:

Signature: _____

Date: _____

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

Pace Solano Title VI Coordinator
419 Mason Street, #118
Vacaville, CA 95688

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

Pace Solano has not been involved in any transportation-related Title VI investigations, lawsuits or complaints.

Pace Solano List of Investigations, Lawsuits and Complaints

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

Public Participation Plan

About Pace Solano

Pace Solano is a private, non-profit corporation, serving adults with intellectual and developmental disabilities in Solano County. Pace Solano is open Monday thru Friday and provides 6 hours of daily programming time. Our day programs are dedicated to improving the lives of the individuals we serve. We provide life skills training, job opportunities, educational classes and transportation services to approximately 360 adults with intellectual and developmental disabilities.

Pace Solano was established in Fairfield in 1960 by a group of very motivated parents seeking educational opportunities for their children. At this time "special education" as we currently know it looked very different and the schools were not mandated to provide support for "severely disabled children". Eventually state mandates changed and districts were required to provide schooling for all children regardless of their disability. Also, landmark legislation was passed enabling individuals with developmental disabilities to live independent and productive lives in their communities. The changes in the schools, coupled with new legislation, caused the agency to re-assess our mission and direction. The decision was made to provide support to adults rather than children. Over the years, we have grown under the watchful eye of the founding members, a committed Board of Directors, caring employees and resources from North Bay Regional Center.

Currently Pace operates six (6) center-based program sites; 2 sites in Vacaville, 2 sites in Fairfield, and 1 location in both the Vallejo and Benicia area.

Pace Solano Transportation provides daily set-route, curb-to-curb service for approximately 187 passengers attending our program sites. Pace Transportation works in conjunction with R & D Transportation Services to determine efficient daily routes to meet the transportation needs of our participants. We are currently running 14 buses to accommodate 50 morning and afternoon routes. Of the individuals we serve, many are physically and mentally unable to use any form of public transportation. Pace Solano drivers are trained to provide the unique, one-to-one service that many of our passengers require.

In addition to the 187 passengers using the daily set-route service we provide, our buses are available, during and after program hours, to the additional 173 Pace Solano individuals who are transported to our program sites by other transportation vendors. Pace provides transportation services for the majority of individuals attending our programs to jobsites and various community activities such as shopping trips, lunch out; as well as, educational and recreational activities. Also, our buses are used after regular program hours to attend special events in and around the Sacramento and Bay Area.

Purposes of the Plan

Public participation is the process through which the public can partake directly in agency decision-making, and express their concerns, desires, and values. The mission statement of Pace Solano is " **Working together for meaningful lives**". Pace Solano will solicit input from the public in order to best support persons served without creating disproportionately high and adverse human health or environmental effects on minority and/or low-income populations.

Summary of Outreach Efforts

The following is a summary of outreach efforts conducted by Pace Solano 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

Pace Solano quarterly Board meetings are open to the public.

Solano County Medical Services Cooperative (SEMSC)

Pace Solano has worked in conjunction with the Solano County Emergency Services Bureau to develop a disaster evacuation plan. This plan specifically addresses the needs of the populations at risk including disabled, minority and low-income. This partnership also includes a coordinated plan in which Pace Solano will provide vehicles, transportation and shelter during evacuation emergencies.

Solano County Transition Fair

Pace Solano participates annually in the Solano County Transition Fair. This event is 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 Pace Solano.

Annual Satisfaction Surveys

Pace Solano conducts Satisfaction Surveys with program participants, and care providers to determine the level of satisfaction and to gain input regarding unmet needs.

Kiwanis Club

To further integrate and enhance our community involvement, on April 26, 2019, Pace Solano Chartered Northern California's first ever Aktion Club, a service club of Kiwanis International for adults with intellectual and developmental disabilities.

Solano County Food Bank

Pace Solano individuals volunteer weekly at the Solano County Food Bank, which serves low-income populations.

Board of Directors – CASA (Court Appointed Special Advocates) of Solano County

CASA of Solano County advocates for abused, neglected, and other identified children within the court system with the belief that each child is entitled to a safe and stable home. The Pace Solano Executive Director has served on this board for over five years.

North Bay Regional Center

Pace Solano is part of the North Bay Regional Center (NBRC) who refers eligible individuals to our programs. NBRC is the sole referral agency for Pace Solano. The program does not serve the general public but rather a limited population of individuals with intellectual and developmental disabilities. NBRC works in conjunction with Pace Solano and other agencies to achieve various outreach opportunities and goals.

R&D Transportation Services

Pace Solano works closely with R&D Transportation to provide routed transportation services to the population served by Pace Solano. R&D Transportation has multilingual staff to assist the LEP populations.

Pace Solano Website

Pace Solano posts notices and announcements on the agency's website. Additional public input can be obtained by the Title VI Complaint Form, which is available as a download in English and Spanish.

The Pace Solano Strategic Plan is developed every five years. On an annual basis, the Pace Solano Board of Directors; in conjunction with, Pace Solano management, review the goals and objectives of the Pace Solano Strategic Plan to assess the agency's progress throughout the year and determine if new goals should be established.

Language Assistance Plan

Overview

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

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

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

Purpose of the Language Assistance Plan

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

Executive Order 13166, titled "Improving Access to Services for Persons with Limited English Proficiency", forbids funding recipients for "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. Pace Solano language assistance plan (LAP) includes a four factor analysis and implementation plan that complies with the requirement for 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 Pace Solano.

Pace Solano 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 intellectual and developmental disabilities where current public transit options are insufficient or do not exist. Eligible Pace Solano program individuals or "riders" must be referred into the program from North Bay Regional Center (NBRC). As such, Pace Solano 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 Solano 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 NBRC Purchase of Service Expenditure and Demographic Data for the fiscal year 2018/2019 shows NBRC purchase of service (POS) authorizations, expenditures and utilization by demographic categories including language. Pace Solano receives case histories of each program individual and maintains a database of information. A historical analysis of this database in regard to language proficiency of all past and present individuals will reflect actual proportions of LEP persons served.

American Community Survey

The U.S. Census Bureau 2019 American Community Survey (ACS) Language Spoken at Home by the Ability to Speak English estimates that of the 447,653 Solano County residents, 23,911 speak Spanish at home and 4,613 or 4.3% speak English less than "very well". All other non-English languages resulted in less than 5% of the population.

Solano County, California	Estimate	Percentage
Total:	447,653	100%
Speak only English	105,102	23%
Spanish	23,911	5.3%
Speak English "very well"	19,298	19.3%
Speak English less than "very well"	4,613	4.3%

North Bay Regional Center (NBRC) Expenditures

The NBRC Purchase of Service and Demographic Data Report for Fiscal Year 2018-2019 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

also spoken “very well” or less than “very well”. As indicated in the Solano County analysis on previous page, Spanish is consistently the primary language for LEP populations. The report further breaks down by age group for ages 22 and older. Pace Solano would be included this category as a provider of services that are purchased by NBRC.

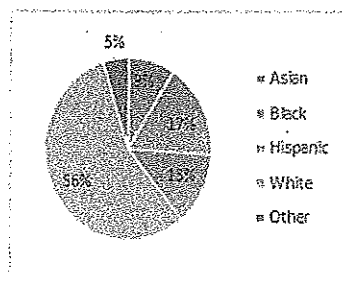
The report indicates that authorized services for ages 22 and older FY 2018-2019 totaled \$208,716,277. Of that total, \$194,964,982 (93.41%) was spent on English speaking individuals and \$9,566,496 (4.58%) was spent on Spanish speaking individuals. Expenditures for other languages totaled less than 3%.

Authorized Services by Languages	Amount	Percent
Total Authorized Services Purchased	\$208,716,277	100%
English	\$194,964,982	93.41%
Spanish	\$9,566,496	4.58%

By comparison, Pace Solano revenue received from NBRC in FY 2018-2019 amounts to approximately 3.64% of the total NBRC authorized services purchased. Theoretically, if this percentage were applied to the services purchased for Spanish speaking individuals (\$190,373) it would equate to the annual revenue necessary to provide services to only 12 Pace Solano Individuals. If it is assumed that these 12 individuals speak Spanish as a primary language, it remains unclear how many would speak English less than “very well” of the remaining English speaking clients.

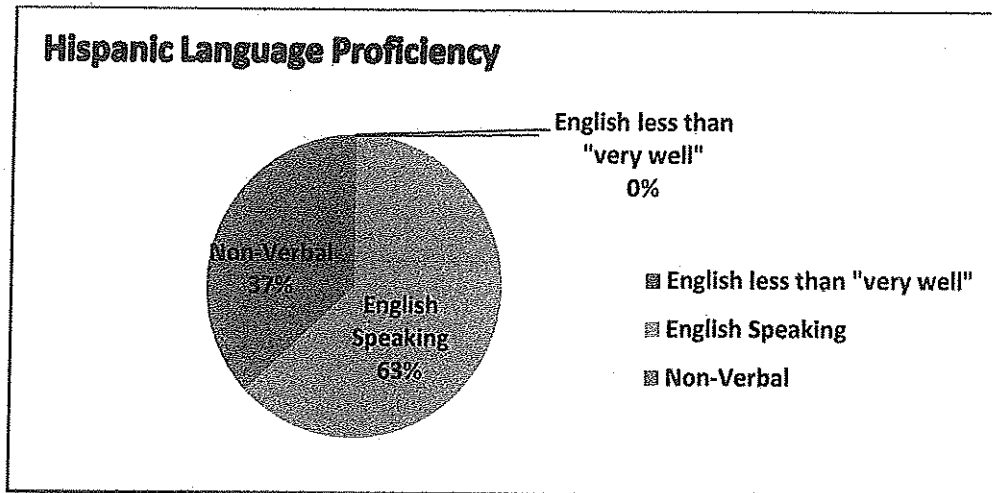
Historical Analysis of LEP Persons Served by Pace Solano

A final source of data to be considered to determine the number of LEP persons likely to be served by this program is a client-by-client analysis of Individuals served by Pace Solano. Pace Solano has served a 6-year average of 395 individuals including those currently enrolled. Of that total, 13% are listed as Hispanic, 17% as Black or African American and 56% are listed as Caucasian. All other ethnicities combined were less than 14%.



Pace Solano Individuals by Ethnicity

In an analysis of the language proficiency of the Hispanic population served, 63% spoke English "very well" and 37% were non-verbal due to their disability. There were **no individuals** that spoke English less than "very well".



Additionally, individuals of this program who speak English or any other language less than "very well" typically have intellectual and developmental disabilities that cause barriers to speech or other forms of communication. **Limited English Proficiency is not 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 individuals 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 yet occurred in this program. However, a survey of the agency's phone reception staff indicated calls from LEP persons are received less than 7 per week. The staff indicated that these calls are primarily received from families of individuals rather than actual program individuals (riders).

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 NBRC staff during planning meetings. Again, the majority of translation occurs with family members, not individuals.

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

The primary purpose of Pace Solano is to provide training opportunities that foster personal growth for individuals with intellectual and developmental disabilities. Transportation during Community Integration training is offered daily as part of the service in addition to daily curb-to-curb transportation services to and from the program. Annual individual surveys indicate that transportation of Community Integration activities, as well as, daily curb-to-curb transportation services are an important part of the services offered for individuals.

Pace Solano serves 360 individuals. The length of time an individual is typically enrolled in the program can range from a few months to many years. Individuals are not required to "graduate" and may remain in the program as long as their needs can continue to be met.

Pace Solano creates opportunities for our individuals with intellectual and developmental disabilities that can enhance the quality of life.

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

The Pace Solano 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 have not been quantified. The majority of larger expenses are allocated to on-line media and publications. Significant outreach budget allocations for the entire agency over the past couple of fiscal years include but are not limited to:

- Redesign of agency web page: \$7,000
- Publications: \$3,000

The transportation budget for Pace Solano, which provides services through the FTA 5310 Grant is approximately \$938,000. The total annual expenditures for Pace Solano outreach activities are less than \$1,000. This includes publications. Specific outreach to LEP populations has not been conducted as a reasonably significant number of LEP persons have not been served by this program, as indicated in Factor 1.

The rates for purchase of service that Pace Solano receives from NBRC as its sole source of service revenue were originally set in 1998. These rates were set with cost-of-living index from 1998 and have not been increased more than 12% in the past two decades, while the cost of living has continued to rise each year. In fact, rates, and subsequently the program's revenue, was decreased a number of years ago further compounding the effects of a rate system that changes infrequently and has not grown with the economy. Several cost-cutting measures have been implemented over the years 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:

- It is likely that NBRC provided funding to Pace Solano for an average of 40 individuals that spoke Spanish as their primary language. English proficiency of those 40 is unknown.
- No “true” LEP persons have been served by Pace Solano.
- Language proficiency is primarily affected by disability rather than a language barrier alone.
- No individual was underserved or exited the program due to language barriers.
- Agency staff reported an average of less than 7 LEP phone calls per week.
- Provision of transportation is considered an “essential” service for the Individuals attending Pace Solano.
- Pace Solano spends \$5,000 per year on all outreach efforts.
- Daily revenue rate for program services is decades old with minimal cost-of-living adjustments over the years.

Language Assistance Implementation Plan

Methodologies

Identifying LEP Individuals

As evidenced by the Four Factor Analysis, very few “true” LEP individuals are referred to the Pace Solano program. The predominant minority language in the region is Spanish. The individuals that are primarily served by Pace Solano have intellectual and developmental disabilities that influence language proficiency rather than a language barrier alone.

While there is a substantial minority population in the region, according to the NBRC Purchase of Service and Demographic Data Report, the funds allocated to the Hispanic language population are minimal. In the history of Pace Solano, there were no individuals served who were LEP due strictly to a language barrier. This agency does, however, have systems in place to provide access to minority populations.

Providing Services

While the agency does not currently have an on-going need for professional translation services, on-site agency staff, fluent in Spanish, provide translation services at the program sites as needed. Documents that are offered in Spanish include:

- Title VI Notice to the Public
- Title VI Complaint Form
- Title VI Complaint Procedures
- Agency Website Title VI information

Other documents can be translated to Spanish orally as appropriate. Due to the low literacy rate of individuals in the Pace Solano program, most documents are translated orally.

Communicating Availability of Language Assistance

Individuals who are referred to Pace Solano for services have a NBRC Service Coordinator who can provide one-on-one guidance and assist with program planning. Both Pace Solano and NBRC will provide Spanish services as needed. Agency staff can also offer translation services to guests and individuals’ family members as appropriate.

The new agency website contains summary information regarding Title VI in Spanish with instructions on how to obtain more information.

Monitoring

Pace Solano 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.

The Pace Solano Annual Report is analyzed for trends and patterns that indicate a need for additional services. This report includes ethnicity and can be used as a guide to determine the need for additional translation services.

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

Employee Training

Pace Solano conducts monthly In-Service training for staff that can include Customer Service and Language Assistance training as it relates to Person Centered Planning for individuals served.

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

Safe Harbor Provision

The Federal Transit Authority Circular 4702.1B states:

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

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

As previously stated, Pace Solano serves adults with moderate to severe intellectual and developmental disabilities who require a high level of supervision. As such, the majority of individuals have limited literacy skills and are unable to read or write. Program documents are generally interpreted orally by Pace Solano staff.

Membership of Non-Elected Committees and Councils

Pace Solano does not have a non-elected transit related advisory council.

Title VI Equity Analysis

Pace Solano does not have transit related facilities.

Board of Directors Approval of Pace Solano Title VI Program

**A RESOLUTION OF PACE SOLANO BOARD OF
DIRECTORS AUTHORIZING THE TITLE VI COMPLIANCE
PLAN FOR THE AGENCY.**


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

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 Pace Solano as follows:

1. The Executive Director is authorized to implement the components of the plan in order to meet Federal requirements.
2. The Executive Director is authorized 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 Pace Solano, State of California, on this March 9, 2021.



President of the Board