Home of Guiding Hands

TITLE VI PROGRAM

Developed: 8/21/18
Approved by Home of Guiding Hands
Board of Directors: 9/11/18

Home of Guiding Hand
1908 Friendship Drive, El Cajon, CA 92020-0501
619-938-2850
www.guidinghands.org
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Updated: 9/11/2018
INTRODUCTION

This document was prepared by Home of Guiding Hands to comply with Title VI of the Civil Rights Act of 1964, including new provisions detailed in U.S. Department of Transportation's Federal Transit Administration (FTA) Circular 4702.1B, “Title VI Requirement and Guidelines for Federal Transit Administration Recipients”; and also Executive Order 12898 on Environmental Justice to address environmental justice in minority populations and low-income populations.

Home of Guiding Hands (HGH) has a 51-year history of providing excellent service to persons with developmental disabilities. HGH provides residential services to about 200 persons with intellectual and developmental disabilities. HGH also provides transportation service to approximately 300 persons who are not HGH residents. HGH picks up these individuals from various group homes and private residences and transports them to various day programs. Many of these individuals have a significant cognitive impairment and are either non-ambulatory and/or medically fragile.

All services provided by HGH are funded under contract with the San Diego Regional Center. The State of California has authorized 21 privately owned regional centers to provide services for persons with intellectual and/or developmental disabilities. HGH does not solicit or advertise for new clients.

Typically, individuals are referred to the San Diego Regional Center (SDRC) by family, friends, or school districts based on a perceived need that additional services might be needed for the person to live and thrive in the community. SDRC completes a comprehensive assessment to determine if additional services are needed and then prepares an Individualized Program Plan or IPP. The IPP is developed entirely by SDRC by an interdisciplinary team of medical professionals, mental health professionals, the individual’s family, and any other necessary input. SDRC selects an organization to provide necessary services and opportunities.

HGH then develops an Individualized Service Plan or ISP, which clearly outlines the steps and activities that HGH will take in order to provide the best opportunity for the individual (client) to successfully meet the goals and requirements of their IPP. SDRC IPP’s may include goals of increased independent living skills, social and community integration. Therefore, transportation services are a critical component of every aspect of HGH operations. SDRC must approve HGH’s ISP for each client.

HGH clients have the opportunity to decline services. For instance, if a client’s ISP includes attending a day program three times a week, the HGH staff will verbally confirm that HGH client wants to go to the day program. The client may choose to stay home and not go to a day program on that particular day.

HGH utilizes staff to verbally communicate with clients in their primary language. Currently, HGH clients, all of whom have the very limited cognitive ability, communicate primarily in English or Spanish. Therefore, HGH manages staffing to ensure they have personnel on site to communicate using either English or Spanish.
There are several incentives for HGH to consistently provide excellent transportation services:

- **Financial Incentive**
  - Most transportation services are paid by SDRC, which provides needed revenue to help offset some of the operating costs for HGH to provide transportation services.

- **Compliance Incentive**
  - SDRC vendor agencies/partner organizations are audited at least annually to confirm compliance with IPP and ISP, including providing transportation services.

- **On-Going Relationship with SDRC**
  - SDRC has a Service Coordinator assigned to each client. Service Coordinators routinely visit the vendor agency/partner organization to observe and verify that all services and opportunities identified in an IPP are being addressed and met by the agency’s ISP.

- **The consistency of Services by Same Organization**
  - By having residential and transportation services under the same organization the two departments are able to maintain an efficient communication line as well as ensure clients receive consistent care no matter whether they are under transportation or residential care.

There are internal policies and procedures, on-going licensing audits, and the involvement of SDRC staff to ensure that HGH consistently serves each client in a manner that provides personal integrity and individuality in the pursuit of goals and objectives in the client’s IPP established by SDRC.

HGH has ethical, financial, and operational compliance incentives to successfully remove all possible barriers to transportation and mobility management services for all of their clients. HGH continues to operate professionally and provide excellent and caring service, which encourages SDRC to continue to support existing placements and to continue to refer additional clients to HGH.
Home of Guiding Hands Title VI Notice to the Public

Notifying the Public of Rights Under Title VI

Home of Guiding Hands

- Home of Guiding Hands operates its programs and services without regard to race, color, or national origin in accordance with Title VI of the Civil Rights Act of 1964. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with Home of Guiding Hands.
- For more information on Home of Guiding Hands' civil rights program, and the procedures to file a complaint, contact 619-938-2850 or visit our administrative office at 1908 Friendship Drive, El Cajon, CA 92020. For more information, visit www.guidinghands.org/title-vi-plan/
- 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 the information is needed in another language, contact 619-938-2850

Notificar al público de los derechos bajo el título VI

Home of Guiding Hands

- Home of Guiding Hands opera sus programas y servicios sin respecto a raza, color o 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 Home of Guiding Hands.
- 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 1908 Friendship Drive, El Cajon, CA 92020. Para más información información, visite www.guidinghands.org/title-vi-plan/
- Un demandante puede presentar una queja directamente con el Federal Transit Administration por archivar una queja con la Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590
- Si se necesita información en otro idioma, contacte al 619-938-2850

Updated: 9/11/2018
List of Locations Where Title VI Notice Is Posted

Home of Guiding hands notice to the public is currently posted at the following locations:

<table>
<thead>
<tr>
<th>Location Name</th>
<th>Address</th>
<th>City</th>
</tr>
</thead>
<tbody>
<tr>
<td>Verbeck Resource Center</td>
<td>1908 Friendship Drive</td>
<td>El Cajon, CA</td>
</tr>
<tr>
<td>South Bay Satellite Office</td>
<td>3030 Market St</td>
<td>San Diego, CA</td>
</tr>
<tr>
<td>El Centro Satellite Office</td>
<td>605 Wake Avenue, Suite 7</td>
<td>El Centro, CA</td>
</tr>
<tr>
<td>Each of 31 groups homes</td>
<td>Various</td>
<td>Various</td>
</tr>
<tr>
<td>All Buses owned and operated by HGH</td>
<td>1908 Friendship Drive</td>
<td>El Cajon, CA</td>
</tr>
<tr>
<td></td>
<td>3030 Market St</td>
<td>San Diego, CA</td>
</tr>
</tbody>
</table>

The Title VI notice and program information is also provided on the Home of Guiding Hands website at guidinghands.org/title-vi-plan/ Information is provided in English and Spanish.

HGH Residential Home Locations

El Cajon            13 Homes
Santee              9 Homes
Lakeside            5 Homes
Spring Valley       1 Homes
Lemon Grove         1 Home
San Diego           2 Homes

NOTE: HGH is prohibited from publishing street addresses of residential homes.

Updated: 9/11/2018
As a sub-recipient of federal dollars, HGH 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. HGH 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 FTA Circular 4702.1B, dated October 1, 2012.

**Discrimination Complaint Procedures**

**Applicability.** The following complaint procedures are applicable to all persons who believe that they have been subject to discrimination by Home of Guiding Hands related to its Transportation Department, which is funded in part by SANDAG. In general, it is designed to address disputes, including but not limited to the following:

- Disagreements regarding a requested service, accommodation, or modification of a Home of Guiding Hands practice or requirement.
- Inaccessibility of a program, publication, or activity.
- Harassment or discrimination prohibited by California or federal law.

**Preliminary Review Process.** The following process must be completed prior to filing a Formal Complaint with SANDAG.

Informal Resolution - Prior to submitting a formal complaint, the complaining party shall contact the Vice President of Operations for assistance in resolving the matter informally as soon as is practical, generally within 15 calendar days of the time from when the subject of the complaint occurred or the complaining party became aware of Home of Guiding Hands' alleged non-compliance with state or federal non-discrimination laws.

The Vice President of Operations can be reached at 1908 Friendship Drive, El Cajon, CA 92020 or 619-938-3067

Home of Guiding Hands will notify SANDAG of the complaint within 72 hours of receiving the complaint and record the complaint and steps taken toward resolution. Home of Guiding Hands is responsible for informing the complaining party about Home of Guiding Hand's complaint procedure, including the opportunity to file a formal complaint with SANDAG and/or the Federal Transit Administration (FTA) as described below.

Report of Results to SANDAG and Complaining Party – Home of Guiding Hands will email or mail SANDAG and the complaining party the results of the informal resolution process within 30 calendar days of receiving the complaint. If the complaining party is not satisfied with [Organization]'s disposition of the matter, the complaining party may file a formal complaint with SANDAG following the procedure described below.

**Formal Complaint.** If the procedure for Preliminary Review and informal resolution by Home of Guiding Hands does not yield a successful resolution, then the complaining party may file a formal, written complaint with SANDAG in the manner described below. SANDAG materials can be made available in
alternative languages. To make a request, call (619) 699-1900. Los materiales de SANDAG están disponibles en otros idiomas. Para hacer una solicitud, llame al (619) 699-1900

Complaints must be filed within ten (10) calendar days of the complaining party's receipt of notice of the end of the Preliminary Review process described above.

Complaints must be in writing and must include an attached copy of any correspondence concerning the complaint with Home of Guiding Hands.

Complaints must be filed with the SANDAG Title VI Compliance Officer at 401 B Street, Suite 800, San Diego, CA 92101; Fax number (619) 699-1995; TTY (619) 699-1904.

Investigation – The SANDAG Title VI Compliance Officer will initiate an investigation, which may include interviewing, consulting with, and/or requesting a written response to the issues raised in the complaint from any individual the SANDAG Title VI Compliance Officer believes to have relevant information, including the ADA Compliance Officer, Home of Guiding Hands staff and members of the public. SANDAG may also hold an informal hearing.

Review Panel – The SANDAG Title VI Compliance Officer will convene a review panel that will consist of the Title VI Compliance Officer, the ADA Compliance Officer if applicable, a member of the SANDAG management staff, the Chief Deputy Executive Director (or designee), and (depending on the issues) other personnel as may be appropriate. This panel will review the request, investigate, and attempt to resolve the issues within 30 calendar days of receipt by SANDAG of the complaint.

Representation - The complaining party, and any party against whom the complaint is directed, have the right to have a representative.

Findings and Notification - The SANDAG Title VI Compliance Officer and/or ADA Compliance Officer will prepare and provide the complaining party, and all other parties involved, a final report containing a summary of the investigation, written findings, and a proposed disposition. This report will be provided to the complaining party and Home of Guiding Hands within 45 calendar days of the filing of the formal complaint.

Final Disposition - The disposition proposed by the review panel will be put into effect promptly. The complaining party or any party against whom the complaint or the proposed disposition is directed may appeal. The appeal to the Executive Director (as set forth below) will not suspend the implementation of the disposition proposed by the SANDAG review panel, except in those circumstances where the SANDAG Executive Director decides that good cause exists making the suspension of implementation appropriate.

**Appeal**

Within 10 calendar days of the issuance of the final report, the complaining party may appeal to the SANDAG Executive Director.

An appeal is taken by filing a written request for review by the SANDAG Executive Director.

The written request for review must specify the particular substantive, and/or procedural basis for the appeal, and must be made on grounds other than general dissatisfaction with the proposed
disposition. Furthermore, the appeal must be directed only to issues raised in the formal complaint as filed or to procedural errors in the conduct of the complaint procedure itself, and not to new issues.

The review by the Executive Director or his or her designee normally shall be limited to the following considerations: Were the proper facts and criteria brought to bear on the decision? Were improper or extraneous facts or criteria brought to bear on the decision that substantially affected the decision to the detriment of the complaining party? Were there any procedural irregularities that substantially affected the outcome of the matter to the detriment of the complaining party? Given proper facts, criteria, and the procedure was the decision one that a person in the position of the decision-maker might reasonably have made?

A copy of the Executive Director’s written decision will be expected within 30 calendar days of the filing of the appeal and shall be sent to all parties involved and, if appropriate, to persons whose authority will be needed to carry out the disposition. The deadline may be extended by the Executive Director for good cause. The decision of the Executive Director on the appeal will be SANDAG’s final decision.

File with the FTA. Any person who believes himself or herself or any specific class of persons to be subjected to discrimination prohibited by Title VI also may file a written complaint with the FTA. A complaint should be filed no later than 180 days after the date of the alleged discrimination unless the time for filing is extended by FTA. Title VI complaints regarding federally funded programs at [Organization] can be sent to the applicable funding agency below:

Federal Transit Administration Office of Civil Rights
Attention: Title VI Program Coordinator
East Building, 5th Floor - TCR
1200 New Jersey Ave., SE
Washington, DC 20590
Discrimination Complaint Form

Instructions: If you believe, Home of Guiding Hands has engaged in discrimination against one or more persons relating to its [name of SANDAG-funded transportation service or program] and you have already attempted to informally resolve your complaint with Home of Guiding Hands without success, please fill out this form completely, in black ink or type-written form. Sign and return to the address below. Alternative means of filing complaints, such as personal interviews or a tape recording of the complaint will be made available for persons with disabilities upon request to SANDAG.

SANDAG materials can be made available in alternative languages. To make a request, call (619) 699-1900. Los materiales de SANDAG están disponibles en otros idiomas. Para hacer una solicitud, llame al (619) 699-1900.

Complainant: ____________________________
Address: ________________________________
City: __________________ State: ___________ Zip Code: __________
Telephone: Home: ___________________________ Business: __________________________
When did the discrimination occur? Date: __________

Describe the acts of discrimination providing the name(s) where possible of the individuals who were responsible for the discriminatory acts (attach additional pages if necessary):

________________________________________________________________________
________________________________________________________________________
________________________________________________________________________
________________________________________________________________________
________________________________________________________________________
________________________________________________________________________
________________________________________________________________________

Return to:
Title VI Coordinator
SANDAG
401 B Street, Suite 800
San Diego, CA 92101
Phone: 619-699-1900; Fax: 619-699-1995; TTY 619-699-1904

Updated: 9/11/2018
Formulario para procedimientos de reclamos por discriminación (SANDAG)

Aplicabilidad. Los siguientes procedimientos de reclamos son pertinentes a todas las personas que consideren que han sido sujetas a discriminación por Home of Guiding Hands con relación a Transportation Departamento, que es financiado total o parcialmente por SANDAG. En general, está diseñado para tratar disputas, incluidas, entre otras, las siguientes:

- Desacuerdos en relación con un servicio solicitado, sitio o modificación de una práctica o requisito de Home of Guiding Hands
- Falta de accesibilidad a un programa, publicación o actividad.
- Acoso o discriminación prohibidos según la ley de California o la ley federal.

Proceso de revisión preliminar. El siguiente proceso debe completarse antes de presentar un reclamo formal ante SANDAG.

Resolución informal: antes de presentar un reclamo formal, la parte demandante deberá comunicarse con [título del cargo dentro de la organización responsable por el cumplimiento del Título VI o reclamos por discriminación] para obtener asistencia en la resolución del asunto de manera informal tan pronto como sea práctico, por lo general, dentro de un plazo de quince (15) días calendario a partir de la fecha en que el asunto del reclamo ocurrió o la parte demandante tuvo conocimiento de la presunta falta de cumplimiento por parte de Home of Guiding Hands en relación con las leyes estatales o federales contra la discriminación.

El Vice President of Operations can be reached at 1908 Friendship Drive, El Cajon, CA 92020 or 619-938-3067

Home of Guiding Hands le notificará a SANDAG sobre el reclamo dentro de un plazo de setenta y dos (72) horas a partir de su recepción y lo registrará junto con los pasos que se tomaron para su resolución. [La Organización] es responsable de informarle a la parte demandante sobre el procedimiento de reclamos de [la Organización], incluida la oportunidad para presentar un reclamo formal ante SANDAG o la Administración Federal de Transporte Público (Federal Transit Administration, FTA) de la manera que se describe a continuación.

Informe de los resultados a SANDAG y a la parte demandante: Home of Guiding Hands le enviará a SANDAG y a la parte demandante, a través de correo electrónico o correspondencia, los resultados del proceso de resolución informal dentro de un plazo de treinta (30) días calendario a partir de la recepción del reclamo. Si la parte demandante no está satisfecha con la disposición de [Organización] con relación al asunto, la parte demandante podrá presentar un reclamo formal ante SANDAG según el procedimiento que se describe a continuación.

Reclamo formal. Si el procedimiento de revisión preliminar y resolución informal de Home of Guiding Hands no produce una resolución satisfactoria, la parte demandante podrá presentar un reclamo formal por escrito ante SANDAG de la manera que se describe a continuación. Los materiales de SANDAG están disponibles en otros idiomas. Para hacer una solicitud, llame al (619) 699-1900.

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Los reclamos deben presentarse dentro de un plazo de diez (10) días calendario a partir de la fecha en que la parte demandante reciba el aviso de finalización del proceso de revisión preliminar descrito anteriormente.

Los reclamos deben presentarse por escrito y deben incluir una copia de cualquier correspondencia con relación al reclamo a [Organización].

Los reclamos deben presentarse ante el Oficial de Cumplimiento del Título VI de SANDAG en 401 B Street, Suite 800, San Diego, CA 92101; número de fax (619) 699-1995; TTY (619) 699-1904.

Investigación: el Oficial de Cumplimiento del Título VI de SANDAG iniciará una investigación, que podrá incluir entrevistar, consultar o solicitar una respuesta por escrito sobre los temas que surgieron en el reclamo a cualquier individuo que el Oficial de Cumplimiento del Título VI de SANDAG considere que tenga información relevante, incluido el Oficial de Cumplimiento de la Ley sobre Estadounidenses con Discapacidades (Americans with Disabilities Act, ADA), personal de [Organización] y miembros del público. SANDAG también podrá sostener una audiencia informal.

Panel de revisión: el Oficial de Cumplimiento del Título VI de SANDAG convocará a un panel de revisión que estará compuesto por el Oficial de Cumplimiento del Título VI de SANDAG, el Oficial de Cumplimiento de la ADA, si corresponde, un miembro del personal de administración de SANDAG, el Director Ejecutivo Adjunto (o su designado) y (dependiendo de los temas) cualquier otro personal, según sea necesario. Este panel revisará la solicitud, investigará e intentará resolver los temas dentro de un plazo de treinta (30) días calendario a partir de que SANDAG reciba el reclamo.

Representación: la parte demandante y cualquier otra parte a quien esté dirigido el reclamo tendrán derecho a tener un representante.

Conclusiones y notificación: el Oficial de Cumplimiento del Título VI de SANDAG o el Oficial de Cumplimiento de la ADA preparará y le suministrará a la parte demandante, y a todas las otras partes involucradas, un informe final que contenga un resumen de la investigación, conclusiones por escrito y una disposición propuesta. Este informe se le suministrará a la parte demandante y a [la Organización] dentro de un plazo de cuarenta y cinco (45) días calendario a partir de la presentación del reclamo formal.

Disposición final: la disposición propuesta por el panel de revisión entrará en vigencia de inmediato. La parte demandante o cualquier otra parte a quien esté dirigido el reclamo o la disposición propuesta podrán apelar. La apelación ante el Director Ejecutivo (como se establece en continuación) no suspenderá la implementación de la disposición propuesta por el panel de revisión de SANDAG, excepto en aquellas circunstancias en las cuales el Director Ejecutivo de SANDAG decida que existe un motivo suficiente para que corresponda la suspensión de la implementación.

Apelación

Dentro de un plazo de diez (10) días calendario a partir de la emisión del informe final, la parte demandante podrá apelar ante el Director Ejecutivo de SANDAG.

Para que se acepte una apelación, debe presentarse una solicitud de revisión por escrito ante el Director Ejecutivo de SANDAG.

Updated: 9/11/2018
La solicitud de revisión por escrito debe especificar la base particular fundamental, procesal o ambas, de la apelación y debe efectuarse por motivos que no sean la insatisfacción general con la disposición propuesta. Además, la apelación debe estar dirigida solo a los temas planteados en el reclamo formal presentado o a los errores procesales en la gestión del procedimiento de reclamo, y no a temas nuevos.

La revisión del Director Ejecutivo o su persona designada normalmente deberá limitarse a las siguientes consideraciones: ¿Influyeron los hechos y criterios correctos sobre la decisión? ¿Influyeron fundamentalmente hechos o criterios incorrectos o irrelevantes sobre la decisión en perjuicio de la parte demandante? ¿Hubo alguna irregularidad procesal que influyó fundamentalmente sobre el resultado de la cuestión en perjuicio de la parte demandante? Dados los hechos, los criterios y el procedimiento correcto, ¿fue esta la decisión que hubiese tomado razonablemente una persona responsable de tomar decisiones?

Se espera una copia de la decisión por escrito del Director Ejecutivo dentro de un plazo de treinta (30) días calendario a partir de la presentación de la apelación, la cual se enviará a todas las partes involucradas y, si corresponde, a las personas cuya autoridad será necesaria para llevar a cabo la disposición. El Director Ejecutivo podrá extender el plazo por un motivo justificado. La decisión del Director Ejecutivo sobre la apelación será la decisión definitiva de SANDAG.

**Presentación de un reclamo ante la FTA.** Cualquier persona que considere que ella misma, o cualquier clase específica de personas esté sometida a la discriminación prohibida bajo el Título VI, también podrá presentar un reclamo por escrito ante la FTA. Un reclamo debe presentarse antes de los 180 días a partir de la fecha de la presunta discriminación, a menos que la FTA extienda el plazo de presentación. Los reclamos de Título VI con relación a programas con financiamiento federal en [Organización] podrán enviarse a la agencia de financiamiento que corresponda a:

Federal Transit Administration Office of Civil Rights  
Attention: Title VI Program Coordinator  
East Building, 5th Floor - TCR  
1200 New Jersey Ave., SE  
Washington, DC 20590

*Updated: 9/11/2018*
Formulario de reclamo por discriminación

Instrucciones: Si considera que [nombre de la Organización] cometió discriminación en contra de una o más personas con relación a su [nombre del servicio o programa financiado por SANDAG] y ya intentó resolver su reclamo de manera informal con Home of Guiding Hands sin tener éxito, por favor, complete en su totalidad este formulario con tinta negra o a máquina. Fírmelo y devuélvalo a la dirección que se indica a continuación. Varios medios para presentar reclamos, como por ejemplo entrevistas personales o una grabación del reclamo, estarán disponibles para las personas con discapacidades, con la previa petición a SANDAG.


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Demandante: ____________________________

Dirección: ____________________________

Ciudad: ____________________________ Estado: ____________________________ Código postal: ____________________________

Teléfono: ____________________________ Residencia: ____________________________ Trabajo: ____________________________

¿Cuándo ocurrió el acto de discriminación? Fecha: ____________________________

Describa los actos de discriminación, suministrando el/los nombre(s), de ser posible, de los individuos responsables de los actos discriminatorios (anexe páginas adicionales de ser necesario):

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Devuélvalo a:
Title VI Coordinator
SANDAG
401 B Street, Suite 800
San Diego, CA 92101

Updated: 9/11/2018
List of Transit-Related Title VI Investigations, Complaints, and Lawsuits

Home of Guiding Hands has not been involved in any transportation-related Title VI investigations, lawsuits or complaints.

As of August 21, 2018

<table>
<thead>
<tr>
<th>Type of Process</th>
<th>Date</th>
<th>Summary (including the basis of complaint)</th>
<th>Status</th>
<th>Action(s) Taken</th>
</tr>
</thead>
<tbody>
<tr>
<td>Investigations</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1. None</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

| Lawsuits        |      |                                            |        |                |
| 1. None         |      |                                            |        |                |

| Complaints      |      |                                            |        |                |
| 1. None         |      |                                            |        |                |

Updated: 9/11/2018
Public Participation Plan

About Home of Guiding Hands

Home of Guiding Hands (HGH) is a 501 (c)(3), nonprofit organization, and has been committed to providing quality community support, critical housing, and life skills training for children, adolescents, and adults with developmental disabilities since its inception in 1961. HGH believes that a self-directed life is a birthright, and considers themselves as partners, facilitators, community members, and teachers.

To be eligible for services, individuals must have a primary diagnosis of a developmental disability. This diagnosis may be compounded by other developmental or physical disabilities such as autism, cerebral palsy, epilepsy or impairment in vision or hearing. Referrals are coordinated with the San Diego Regional Center for the developmentally disabled.

HGH provides services to over 3,200 children and adults throughout San Diego and Imperial County. The basis for the services that HGH provides is their belief that individuals can thrive in a setting that offers a more fulfilling lifestyle, provides individualized attention, stresses increased opportunities for self-sufficiency, and encourages greater community integration and access.

HGH maintains an active email and US Mailing list of over 2,500 individuals and organizations who are “friends of HGH”. Additionally, HGH maintains an active donor base of over 700 individuals and organizations. HGH ongoing communication and funding requests to these companies and individuals is a critical component to HGH’s on-going, effective outreach plan.

HGH Primary programs include:

Residential Services: HGH serves 31 residential homes providing support to children, adolescents, and adults with intellectual and developmental disabilities that include autism, cerebral palsy, and epilepsy. HGH residents range in age from 14 to 84 and live in comfortable, friendly environments with varying levels of support and training. All HGH residential units include 24-hour care and trained, competent supervision. Each person receives individualized support to live, work, and play in their own community. [Approximately 250 HGH staff serve 182 HGH client/residents]

The Community Living Program: This HGH program supports and encourages the greatest level of independence for individuals living in their own homes or apartments while assisting them to maximize their self-sufficiency. Each week a trained counselor provides one-on-one support in the areas of money management, meal preparation and planning, transportation, shopping, and accessing community resources. Community integration is a critical component of this HGH program. [Approximately 12 HGH staff serve 35 HGH clients: all of whom use public transportation]

The Adult Family Home Agency (AFHA): The AFHA program is ideal for individuals transitioning from their existing residential setting to live with a new family. The individual is integrated into family life, receives support from the family, and is involved in the everyday happenings and joys of a home. Host families receive a stipend from SDRC. [Approximately 2 HGH Staff and 12 families serving 14 participants]
Early Childhood Development: A dual purpose program which provides therapeutic and educational early intervention to young children ages birth to three years old who are at risk of delay or have been diagnosed with a developmental disability. HGH currently supports over 180 infants and toddlers. [Approximately 25 HGH teaching staff serve over 400 HGH client families]

Transportation: A specialized transportation service for around 300 individuals who experience significant physical and/or medical challenges. HGH transports adults to day programs in Eastern, Central, and Southern San Diego County. This service enables adults with profound medical needs to connect with others in their community. Roughly 150 of the 300 clients live in HGH residential homes. This improves the continuity of services and supports those living in HGH homes. HGH also provides transportation during weekends and evenings for social, educational, and religious meetings and events and also for medical appointments. [Approximately 37 HGH staff serve approximately 150 HGH Clients and 150 non-HGH clients]

Respite Services: HGH provides in-home support to enable a family and/or caregiver to feel comfortable taking a break from the intensive supervision and care of their family member. HGH honors and respects the physical and emotional energy necessary to keep a family member in their home. [Approximately 400 HGH staff serve approximately 1,109 client families]

Counseling & Family Support Service: HGH provides therapeutic counseling services in a confidential and supportive environment. Individualized therapy, as well as caregiver and sibling support groups, are available. Services are provided either by a licensed marriage and family therapist (MFT) or by registered MFT interns. HGH clinicians have extensive experience working with people with developmental and intellectual disabilities and their families. [3 HGH Staff spend approximately 7 hours each week providing services to approximately 45 clients]

Life Planning Services: The Life Planning Program provides the opportunity for families to identify the factors that will ensure the quality of life for their child throughout his or her lifetime. Parents consider what needs to be in place for the quality of life to continue when they are no longer able to provide care. The program consists of a six-session workshop series designed to give families the tools they need to develop a life plan that incorporates the future needs and desires of the entire family, focusing particularly on the needs of the family member with an intellectual disability. [One HGH Staff works with approximately 50-60 families each year]

Infant Development Assessment (IDA): The IDA Program is a broad-based, comprehensive, multidisciplinary, family oriented development assessment. HGH employees evaluate children from four months to three years of age for the purpose of establishing eligibility for CA Early Start services. Evaluators have extensive pediatric experience and are highly trained in the areas of cognitive, speech, gross/motor, and social/emotional development. [11 HGH Staff complete approximately 1,060 IDAs each year]

HGH provides a residential living, training, and other support services for adults and children with a wide range of emotional, behavioral, and physical disabilities, while also providing support to their families. Services for the programs are funded under contract with the San Diego Regional Center (SDRC), which refers eligible individuals to enroll in the programs provided by HGH. SDRC is the sole referral agency for HGH. Generally, most documents presented to HGH clients are presented directly by SDRC. HGH reviews a Resident Rights form with new residents. This form is available in English and Spanish. The Resident

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Rights form also is reviewed with clients’ families if appropriate. The service worker from SDRC is aware of HGH procedures for new clients and is welcome to observe this intake process.

There is a wide range of individualized goals established for HGH clients utilizing various programs depending on the goals and needs of each person. Curricula can include training in the areas of social skills, self-advocacy, vocational skills, personal health and safety, technology, vocational skills, cognitive skills, community integration, and recreation. Currently, approximately 98% of all people living in HGH’s residential group homes receive either SSI or SSA benefits.

**Purposes of the HGH Public Participation Plan**

Public participation is the process through which stakeholders can participate directly in agency decision-making, and express their concerns, desires, and values. It is the mission of HGH to "improve the lives of people with disabilities by creating opportunities to maximize their independence." At every opportunity, through established and ad-hoc methods, HGH will solicit input from stakeholders to help support persons served by HGH 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 HGH. Many activities are conducted as collaboration, partnership, or ad hoc outreach with other service organizations and non-profit agencies within the community. HGH’s outreach efforts include, but are not limited to, the following as they relate specifically to minority and low-income populations.

**Board Meetings Open to the Public**

HGH has monthly Board meetings, which are open to the public.

**FACT (Full Access and Coordinated Transportation)**

FACT serves as a one-stop mobility center for San Diego County. It provides free telephone and web referrals to transportation services and also provides a dial-a-ride service, RideFACT, for seniors and persons with disabilities. The Transportation Manager at HGH participates in FACT board meetings and provides expert guidance on transit-related issues for individuals with disabilities. The FACT Board meets monthly and conducts outreach to minority and low-income populations in order to address unmet needs. Forms provided by FACT are in English and Spanish.

**Stellar Care**

Stellar Care is an assisted living and residential care facility located in the San Diego area. They specialize in Alzheimer’s and Memory Care services and prioritize meeting the physical and emotional needs of their clients on a daily basis. HGH is contracted with Stellar Care to provide transportation to and from doctors’ appointments, group outings and other necessary services related to transportation for the organization.

**San Diego County Office of Emergency Services**

HGH has worked in conjunction with the San Diego County Office of Emergency Services (OES) for the last three years in the development of the San Diego County Evacuation Plan. This plan specifically addresses the needs of populations at risk including disabled, minority, and low-income individuals. This
partnership also includes a coordinated plan in which HGH will provide vehicles, transportation, and shelter during emergency evacuations. Forms provided by OES are in English and Spanish.

**Community Events**

HGH participates annually in the following community events: Grossmont Healthcare District Health Fair, Involved Exceptional Parent’s Day Conference, Developmental Disabilities Provider Network Legislative Forum, San Diego People First Conference, Grossmont Healthcare District Kids Care Fest, Fiesta Educativa, Buddy Walk, Autism Speaks Walk, and the Infant Development Association Conference. These events are designed to bring awareness to the different services and programs Home of Guiding Hands’ offers. Most events are free others have a minimal fee to the public to participate. Community events vary from 100-4,500 participants. The events are held in a variety of locations in San Diego including the courtyard of the Grossmont Center shopping mall, Balboa Park Club, Handlery Hotel, San Diego Mission Valley Marriott, Liberty Station Point Loma, and Lakeside Rodeo Grounds. HGH provides information in English and Spanish and is represented by bi-lingual staff at these community events.

**East County Regional Chamber of Commerce**

HGH is a member of the San Diego Regional East County Chamber of Commerce, which serves over 800 business and individuals in San Diego’s East County region.

**San Diego Regional Chamber of Commerce:**

HGH is a member of the San Diego Regional County Chamber of Commerce, which boasts 3,000 members who represent 400,000 San Diego employees in San Diego’s region

**Home of Guiding Hands Annual Meeting**

HGH hosts an Annual Meeting and Awards Ceremony annually to recognize the achievements of both Board members and members of the community.

**Annual Satisfaction Surveys**

HGH conducts annual satisfaction surveys with program participants and stakeholders of the agency to determine the level of satisfaction and gain input regarding unmet needs. Survey forms translated into Spanish are provided for clients and their families whose primary language is Spanish.

**Home of Guiding Hands Website**

HGH website provides information about the organization and programs it offers. The HGH website also lists ways to support HGH, news about upcoming events, grants received, and career positions that are available.

**Service Clubs**

HGH maintains an on-going partnership with several service clubs in the San Diego area. Clubs that support HGH include the El Cajon Rotary Club, La Mesa Rotary Club, The Rotary Club of Mission Valley Sunset, Rancho San Diego Kiwanis Club, La Mesa Lions Club, Boy Scouts of America, Santee VFW, Alpine Kiwanis Club, and the La Jolla Kiwanis Club.

**Outreach**

HGH sends out bi-monthly email blasts to over 2,500 people in their managed database. HGH updates its website and Facebook page weekly, posts their annual report on the website, and hosts a Young Professional Event twice a year. E-mail and social media outreach have proven to be excellent, effective activities for HGH to communicate with the public on a consistent basis.
HGH also utilizes US Postal Service to mail community updates and marketing material to HGH supporters during the year.

Language Assistance Plan

Overview

The first section of this document describes the purpose of the Language Assistance Plan (LAP). The second section in this document provides the Four Factor Analysis, used to identify Limited English Proficiency (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 by an activity or program provided by the Home of Guiding Hands (HGH).

Factor 2: The frequency with which LEP persons come in contact with any service or program provided by HGH.

Factor 3: The nature and importance of programs, activities or services provided by HGH to the LEP population.

Factor 4: The resources available to HGH and overall cost to provide LEP assistance.

Additional sections discuss the implementation of the LAP, which includes methodologies for identifying LEP individuals, providing services, establishing policies, and monitoring the LAP, and also includes 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 LEP persons have 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 and sub-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 and sub-recipients of FTA financial assistance to comply with Title VI and related executive orders including those pertaining to LEP persons.

The United States Department of Transportation (DOT) published guidance that directed its recipients and sub-recipients to ensure meaningful access to the benefits, services, information, and other

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important portions of their programs and activities for LEP persons. HGH's LAP) includes a Four-Factor Analysis and implementation plan that complies with DOT requirements.

Four Factor Analysis

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

HGH maintains a unique position in regard to meeting the Title VI requirements. As a sub-recipient of FTA Section 5310 Grant funding, the agency's focus is primarily to transport adults with disabilities where current public transit options are insufficient or do not exist. Eligible program participants or "riders" must be referred into the program by the San Diego Regional Center (SDRC). As such, HGH does not offer transportation to the general public other than in specific situations, such as in emergencies or through contracts with memory care homes. Therefore, an analysis of public demographic data in San Diego County does not represent actual populations served by HGH.

The following two data sources were used to evaluate the LEP persons eligible to be served by HGH:

U.S. Census, 2011-2013 American Community Survey (ACS) 3-Year Data; and
The San Diego Regional Center’s Demographic Data

American Community Survey

According to the U.S. Census 2011-2013 American Community Survey (ACS), approximately 25% of the population in the County of San Diego speaks Spanish. Other languages that account for at least 1% of the population include Tagalog, Vietnamese, and Chinese. Table 1 shows the top five languages spoken at home by the ability to speak English in the County of San Diego.

Table 1: Language Spoken at Home by Ability to Speak English in the San Diego County

<table>
<thead>
<tr>
<th>San Diego County, CA</th>
<th>Estimate</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total:</td>
<td>2,966,752</td>
<td>100.00%</td>
</tr>
<tr>
<td>Speak only English</td>
<td>1,848,070</td>
<td>62.29%</td>
</tr>
<tr>
<td>Spanish or Spanish Creole:</td>
<td>736,694</td>
<td>24.83%</td>
</tr>
<tr>
<td>Speak English &quot;very well&quot;</td>
<td>416,815</td>
<td>14.05%</td>
</tr>
<tr>
<td>Speak English less than &quot;very well&quot;</td>
<td>319,879</td>
<td>10.78%</td>
</tr>
<tr>
<td>Tagalog:</td>
<td>93,144</td>
<td>3.14%</td>
</tr>
<tr>
<td>Speak English &quot;very well&quot;</td>
<td>56,088</td>
<td>1.89%</td>
</tr>
<tr>
<td>Speak English less than &quot;very well&quot;</td>
<td>37,056</td>
<td>1.25%</td>
</tr>
<tr>
<td>Vietnamese:</td>
<td>44,925</td>
<td>1.51%</td>
</tr>
<tr>
<td>Speak English &quot;very well&quot;</td>
<td>17,570</td>
<td>0.59%</td>
</tr>
<tr>
<td>Speak English less than &quot;very well&quot;</td>
<td>27,355</td>
<td>0.92%</td>
</tr>
<tr>
<td>Chinese:</td>
<td>40,228</td>
<td>1.36%</td>
</tr>
<tr>
<td>Speak English &quot;very well&quot;</td>
<td>19,981</td>
<td>0.67%</td>
</tr>
<tr>
<td>Speak English less than &quot;very well&quot;</td>
<td>20,247</td>
<td>0.68%</td>
</tr>
</tbody>
</table>

Source: U.S. Census Bureau, 2011-2013 American Community Survey 3-Year Data, Table B16001

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The ACS also estimates that 291,614 individuals in San Diego County have a disability, which accounts for approximately 9.5% of the population within the County. Table 2 shows the disability status of the San Diego County population. There is no data available to determine the languages spoken at home or ability to speak English for the disabled population.

Table 2: Disability Status in San Diego County

<table>
<thead>
<tr>
<th>San Diego County, CA</th>
<th>Total</th>
<th>With a disability</th>
<th>Percent with a disability</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total civilian noninstitutionalized population</td>
<td>3,074,879</td>
<td>291,614</td>
<td>9.5%</td>
</tr>
</tbody>
</table>

Source: U.S. Census Bureau, 2011-2013 American Community Survey 3-Year Data, Table S1810

San Diego Regional Center (SDRC) Expenditures
SDRC serves approximately 23,100 persons and provides them with authorized services amounting to $276,559,538. Approximately 7,206 or 31% of the persons SDRC serves self-identified Spanish as their primary language. The report indicates that 70% of authorized services for ages 22 and older in FY 2012-2013 was spent on English and other languages, and 30% was spent on Spanish-speaking clients.

The SDRC expenditure report shows expenditures for services to clients by their primary language spoken but does not ascertain whether English is also spoken "very well" or less than "very well".

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

Historical Analysis of LEP Persons Served by Home of Guiding Hands

HGH internal records confirm 90% of HGH clients for the past 48 years have been English-speaking and less than 15% have been Spanish-speaking. Less than 2% of HGH clients at any one time in HGH's history have spoken a language other than English or Spanish.

HGH also analyzed the communication proficiency of the English and Spanish-speaking clients and identified over 35% were communication-challenged due to their disability. This confirms that for HGH, Limited English Proficiency in this population is not solely due to a language barrier but a disability as well. Critical documents are provided in English and Spanish. HGH staff verbally reviews critical documents with clients in the appropriate language.

A review of previous HGH clients indicates that no clients have exited HGH's services due to language barriers. The most common reasons for the conclusion of services are the passing away of clients, medical needs beyond what our scope provides and personal choice.

A recent internal survey from HGH phone reception staff indicated that approximately 2 to 3 phone calls are received weekly from Spanish-speaking persons. These persons are usually family members of existing or potential future HGH clients. HGH bilingual staff are able to manage these inquiries.

Translation services are provided by agency staff, and the majority of translation occurs with family members, guardians, and the SDRC assigned service coordinator.

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<table>
<thead>
<tr>
<th>Primary Language (ranked by most number of LEP persons)</th>
<th>Number of speakers</th>
<th>Percent of Total Clients</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. English</td>
<td>189</td>
<td>64%</td>
</tr>
<tr>
<td>2. Spanish</td>
<td>104</td>
<td>35%</td>
</tr>
<tr>
<td>3. Other</td>
<td>2</td>
<td>1%</td>
</tr>
</tbody>
</table>

**Home of Guiding Hands Transportation Clients**

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

The primary purpose of HGH programs and services is to provide training and other opportunities that foster personal growth for individuals with intellectual and/or developmental disabilities. HGH was started by a small group of East San Diego County leaders and today HGH provides a multitude of services to over 3,200 children and adults throughout San Diego County. Without HGH, people with developmental disabilities would a significant reduction in opportunities for education, recreation, socialization, job training, and community integration. Also, because of the staff and community partners and outreach efforts of HGH in providing information at various events, many other members of the community benefit from HGH.

**Factor 4: The resources available to the recipient for LEP outreach**

Over 100 members of HGH staff are bilingual, and there is always an HGH staff member on duty who speaks Spanish.

If HGH receives a phone call from an individual who speaks a language other than English or Spanish, HGH has an additional resource in SDRC. Based on HGH’s long-term working relationship with SDRC, HGH is able to utilize SDRC staff as an additional resource. The HGH phone system displays the unblocked caller’s phone number. When possible and/or appropriate, HGH staff can call SDRC, notify them of the phone call, and provide SDRC with the non-English or Spanish-speaking person’s phone number. SDRC has administrative staff and caseworkers who speak Farsi, Arabic, and Tagalog. These languages are present in HGH’s service area, however, HGH does not have any clients who speak a language other than English or Spanish.

HGH has an Individualized Service Plan (ISP) for each person it serves and receives a consistent flow of referrals from the San Diego Regional Center.

**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 the 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."

Based on Factor I analysis, Spanish exceeds the Safe Harbor Threshold.

Documents that are offered in Spanish by HGH include:

**Vital Documents**
- Title VI Notice to the Public
- Title VI Complaint Procedures
- Title VI Complaint Form
- Admission Agreement, including Resident Rights

**Outreach Documents**
- HGH Client Survey Forms
- HGH Electronic Newsletters
- Brochures describing critical programs and services provided by HGH

HGH exists to serve persons with intellectual and/or developmental disabilities. HGH has a rich and robust history of removing barriers and providing many new opportunities for self-improvement and community integration. Many HGH clients can be considered LEP persons based on their diagnoses. HGH has existing policies and procedures, and well trained and caring staff members to continue to provide excellent services to our client base.

**Language Assistance Implementation Plan for Home of Guiding Hands: Methodologies**

**How HGH provides language assistance services**
HGH provides language assistance to LEP persons by;
- Providing bilingual (English/Spanish) professional staff
- Providing documents translated into Spanish
- Providing documents and information translated into Spanish on the HGH website
- Providing oral translation services when appropriate
- Referring LEP persons to SDRC for additional language assistance

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Communicating availability of language assistance
Individuals referred to HGH are assigned a case service counselor by SDRC who provides one-on-one guidance and program planning. Case service counselors can offer Spanish translation services as needed. HGH reception staff can also offer translation services to guests and consumers’ family members as appropriate.

The HGH website also contains contact information regarding programs and services in Spanish with instructions on how to obtain more information.

Monitoring
HGH is assessed by internal committees and external licensing entities based on HGH efforts and results to remove and/or to minimize any barriers to transportation and other services. Any potential communication and/or language barriers are also reviewed annually.

To date, HGH has not received any request for translation services in languages other than English or Spanish. HGH policy regarding any new request for translation services is to record the following information:
- Date of request
- Language other than English or Spanish for which translation is requested
- Type of translation requested (either oral or written translation)
- The document requested to be translated

Employee Training
HGH conducts monthly in-service training for staff that includes sensitivity training, customer service, and language assistance training. These monthly in-service meetings are mandatory for all staff.

Minority Representation on Planning and Advisory Bodies
Home of Guiding Hands does not have a non-elected transit-related planning board, advisory council, or committees at this time.

Title VI Equity Analysis
Home of Guiding Hands does not have transit-related facilities.
Board of Directors Approval of Home of Guiding Hands Title VI Program

A RESOLUTION OF THE Home of Guiding Hands BOARD OF DIRECTORS
AUTHORIZING THE TITLE VI COMPLIANCE PLAN FOR THE AGENCY.

WHEREAS, Home of Guiding Hands 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 Home of Guiding Hands as follows:

1. The President and CEO is authorized to implement the components of the plan in order to meet Federal requirements.
2. The President and CEO 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 Home of Guiding Hands, State of California, on this 11 day of September 2018.

________________________________________
President of the Board

Updated: 9/11/2018
Board of Directors Approval of Home of Guiding Hands Title VI Program

A RESOLUTION OF THE Home of Guiding Hands BOARD OF DIRECTORS AUTHORIZING THE TITLE VI COMPLIANCE PLAN FOR THE AGENCY.

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PASSED AND ADOPTED by the Board of Directors of Home of Guiding Hands, State of California, on this 11 day of September 2018.

[Signature]
President of the Board

Updated: 9/5/2018