



# TITLE VI PLAN

Adopted by the EXCEED Board of Directors  
January 26, 2021

Valley Resource Center Inc. dba EXCEED

This document was prepared by EXCEED and approved by its Board of Directors to comply with Title VI of the Civil Rights Act of 1964, including new provisions detailed in U.S. Department of Transportation's FTA Circular 4702.18, "Title VI Requirement and Guidelines for Federal Transit Administration Recipients."

EXCEED's purpose is to enhance the quality of life for adults with developmental disabilities by providing opportunities for education, social skills development, community integration, self-advocacy, pre-vocational and daily living skills development, and mobility possibilities, so they have the opportunity to reach their maximum potential.

EXCEED does not provide fixed-route public transportation. Our transportation services include assisted door-to-door, on-time transportation to EXCEED's site-based and community-based programs for EXCEED program participants. EXCEED's current fleet of vehicles includes 12 buses and 7 vans used to transport client on a regular basis to day programs, medical appointment and community activities.

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## **Title VI Notice to the Public**

### **Notifying the Public of Rights Under Title VI**

EXCEED operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with EXCEED.

For more information on EXCEED's civil rights program, and the procedures to file a complaint, contact 951-658-0000 x 262 or email [sandraaldridge@weexceed.org](mailto:sandraaldridge@weexceed.org); or visit our Administration office at 1285 N. Santa Fe, Hemet, CA 92543

For more information, visit <https://weexceed.org/titlevi>

A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.

If information is needed in another language, contact 951-658-0000 x262

### **Notificar al Publico de los Derechos Bajo el Titulo VI**

EXCEED opera sus programas y servicios, sin distincion de raza, color y origen nacional, de conformidad con el Titulo VI de la Ley de Derechos Civiles. Cualquier persona que cree que el o ella ha sido agraviada por cualquier practica discriminatoria ilegal bajo el Titulo VI, puede presentar una queja ante EXCEED.

Para obtener mas informacion sobre la EXCEED programa de derechos civiles, y los procedimientos para presentar una queja, contacte 951-658-0000 x 262 o por correo electronico [sandraaldridge@weexceed.org](mailto:sandraaldridge@weexceed.org); o visite nuestra oficina de Administraci6n en 1285 N. Santa Fe, Hemet, CA 92543. Para obtener mas informaci6n, visite <https://weexceed.org/titlevi>

El demandante puede presentar una queja directamente con la Administraci6n Federal de Transporte mediante la presentaci6n de una queja ante la Oficina de Derechos Civiles, Atenci6n: Coordinador de Programa del Titulo VI, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590 .

Si se necesita informacion en otro idioma, comuniquese con 951-658-0000 x 262.

## **List of Locations Where Title VI Notice Is Posted**

EXCEED's Title VI Notice to the Public is posted in the following locations in English & Spanish.

<b>LOCATION</b>	<b>ADDRESS</b>
EXCEED Website	<a href="https://weexceed.org/titlevi">https://weexceed.org/titlevi</a>
EXCEED Administration	1285 North Santa Fe St. Hemet, CA 95243
EXCEED Hemet Facility	1285 North Santa Fe St. Hemet, CA 92543
EXCEED Perris	170 Wilkerson Ave. Perris, CA 92571
EXCEED Perris	2050 Trumble Rd. Perris, CA 92571
EXCEED Riverside	7893 Mission Grove Parkway South, Suite C Riverside, CA 92508
EXCEED Riverside	7891 Mission Grove Parkway South, Suite A Riverside, CA 92508
EXCEED Murrieta	40119 Murrieta Hot Springs Rd. Ste B104 Murrieta, CA 92563
EXCEED Residential Facility (Casa del Valle)	789 E. Main St. San Jacinto, CA 92583
Varied	Inside all 5310 and other transportation vehicles throughout Perris, Hemet, Riverside, Murrieta, and San Jacinto

## **Title VI Complaint Procedures**

As a recipient of federal dollars, EXCEED 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. EXCEED has a Title VI Complaint Procedure in place, which outlines the 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 EXCEED may file a Title VI complaint by completing and submitting the Title VI Complaint Form. The form is available on our website at <https://weexceed.org/titlevi>.

EXCEED investigates complaints received no more than 180 days after the alleged incident. EXCEED will only process complaints that are complete. Within 10 business days of receiving the complaint, EXCEED will review it to determine if our organization has jurisdiction. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our organization. EXCEED 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, EXCEED may contact the complainant. The complainant has 10 business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within 10 business days EXCEED can administratively close the case.

A case can be administratively closed if the complainant no longer wishes to pursue their case. After the investigator reviews the complaint, she/he will issue one of two letters to the complainant: a closure letter, or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. An LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member, or other action will occur.

If the complainant wishes to appeal the decision, she/he has 10 business days after the date of the letter or the LOF to do so.

A person may also file a complaint directly with the Federal Transit Administration, at FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590

## Titulo VI Procedimiento de Queja

Como un receptor de dólares federales, EXCEED tiene que cumplir con lo dispuesto en el Titulo VI de la ley de los derechos civiles de 1964 y asegurarse de que los servicios y los beneficios se proporcionen sobre una base no discriminatoria. EXCEED ha puesto en marcha un procedimiento de queja Titulo VI, que emboza un proceso de disposición local de quejas del Titulo VI y es consistente con las pautas de Administración Federal de Transite Circular 4702.1B, de Octubre 1, 2012.

Cualquier persona que cree que ha sido objeto de discriminación por motivos de raza, color, u origen nacional por EXCEED puede presentar al Titulo VI su denuncia. EXCEED investiga las quejas no mas de 180 dias despues del incidente. EXCEED . solo tramitara las quejas que estan completas. El formulario está disponible en nuestra página web: <https://weexceed.org/titlevi>

En un periodo de 10 dias de haber recibido la demanda, EXCEED la revisara para determinar si nuestra oficina tiene la jurisdicción. El autor de la queja, recibira un acuse de recibo informandole al denunciante que sera notificado por escrito si el caso de el/ella el sera investigado por nuestra oficina. EXCEED tiene 30 dias para investigar la queja.

Si necesita mas información para resolver el caso, EXCEED puede contactar al autor de la queja. El autor de la queja tiene 10 dias de la fecha que recibió la carta para solicitar un investigador que sea asignado al caso.

El caso se puede cerrar tambien si el autor de la queja no desea proseguir con el caso. Despues de que el investigador analice la queja, el / ella emitira una de las dos cartas a la denunciante.

Una persona tambien puede presentar una queja directamente con la Administración Federal de Transito, en TLC Oficina de Derechos Civiles, 1200 New Jersey Avenue SE, Washington, DC 20590.

# Title VI Complaint Form

<b>Section I:</b>				
Name:				
Address:				
Telephone (Home):			Telephone (Work):	
Electronic Mail Address:				
Accessible Format Requirements?	Large Print		Audio Tape	
	TDD		Other	
<b>Section II:</b>				
Are you filing this complaint on your own behalf?			Yes*	No
*If you answered "yes" to this question, go to Section III.				
If not, please supply the name and relationship of the person for whom you are complaining:				
Please explain why you have filed for a third party:				
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.			Yes	No
<b>Section III:</b>				
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 (Month, Day, Year): _____ Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.				
<b>Section IV</b>				
Have you previously filed a Title VI complaint with this agency?			Yes	No
<b>Section V</b>				
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"/> Federal Court <input type="checkbox"/> State Agency <input type="checkbox"/> State Court <input type="checkbox"/> Local Agency				
Please provide information about a contact person at the agency/court where the complaint was filed.				
Name:				
Title:				
Agency:				
Address:				
Telephone:				
<b>Section VI</b>				
Name of Transit Agency complaint is against:				
Contact person:				
Title:				
Telephone number:				

You may attach any written materials or other information that you think is relevant to your complaint. Signature and signature date required below.

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

Please submit this form in person at the address below, or mail this form to:  
 EXCEED Title VI Coordinator, 1285 North Santa Fe St., Hemet, CA 92543



## Formulario de reclamación del Título VI

<b>Sección I:</b>				
Nombre:				
Dirección:				
Teléfono (casa):			Teléfono (trabajo):	
Dirección de correo electrónico:				
Requisitos de formato accesible?	Con letras grandes?		Cinta de audio	
	TDD		Otro	
<b>Sección II:</b>				
¿Presenta esta queja en su propio nombre?			Sí*	No
*Si respondió "sí" a esta pregunta, vaya a la Sección III.				
Si no, por favor proporcione el nombre y la relación de la persona por la que se está quejando:				
Por favor, explique por qué ha solicitado a un tercero:				
Por favor, confirme que ha obtenido el permiso de la parte agraviada si está			Sí	No
<b>Sección III:</b>				
Creo que la discriminación que experimenté se basó en (marque todo lo que corresponda): <input type="checkbox"/> Raza <input type="checkbox"/> Color <input type="checkbox"/> <input type="checkbox"/> Origen nacional Fecha de la supuesta discriminación (mes, día, año): _____ Explique lo más claramente posible lo que pasó y por qué cree que fue discriminado. Describa a todas las personas que estuvieron involucradas. Incluya el nombre y la información de contacto de la(s) persona(s) que lo discriminó (si se conoce), así como los nombres y la información de contacto de los testigos. Si necesita más espacio, por favor use el reverso de este formulario. Traducción realizada con la versión gratuita del traductor				
<b>Sección IV:</b>				
¿Ha presentado anteriormente una queja del Título VI en esta agencia?			Sí	No
<b>Sección V</b>				
¿Ha presentado esta queja ante alguna otra agencia federal, estatal o local, o ante algún tribunal federal o estatal? <input type="checkbox"/> Si <input type="checkbox"/> No Si es así, marque todo lo que corresponda: <input type="checkbox"/> Agencia Federal: <input type="checkbox"/> Corte Federal <input type="checkbox"/> Agencia Estatal <input type="checkbox"/> Corte Estatal <input type="checkbox"/> Agencia Local				
Sírvese proporcionar información sobre una persona de contacto en la agencia/tribunal donde se presentó la denuncia.				
Nombre y apellido:				
Título:				
Agencia:				
Dirección:				
Teléfono:				
<b>Sección VI</b>				
El nombre de la Agencia de Tránsito es la queja en contra:				
Persona de contacto:				
Título:				
Número de teléfono:				

Puede adjuntar cualquier material escrito u otra información que considere relev. A continuación se requiere la firma y la fecha de la firma.

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

Por favor, envíe este formulario en persona a la dirección que figura a continuación, o envíelo por correo a:  
 EXCEED Coordinador del Título VI, 1285 North Santa Fe St., Hemet, CA 92543

## **List of Transit Related Title VI Investigations, Complaints & Lawsuits**

EXCEED has not received any Title VI transit-related complaints or has had any Title VI transit-related complaints or lawsuits.

# **Public Participation Plan**

## ***Purpose of this Plan***

Public participation is the process through which stakeholders can partake directly in agency decision-making and express their concerns, desires, and values. It is the mission of this agency to provide service and advocacy, which creates choices and opportunities, for adults with disabilities to reach their maximum potential. At every opportunity through prescribed methods, the agency will solicit input from stakeholders in order to best support our program participants without creating disproportionately high and adverse human health or environmental effects on minority and/or low-income populations.

## ***Demographic Analysis of Program Participants***

EXCEED serves approximately 600 persons, in all programs, each year. During 2020, 37% identified as Hispanic, 21% African-American, and 38% identified as Caucasian. Other ethnicities (Asian, Pacific Islander, Native American and Other) made up 4% of the EXCEED population.

In 2020, our consumers by language were 89% English, 7% Spanish and 4% American Sign Language. In an analysis of the language proficiency of the Spanish Speakers, 76% of those spoke English "very well", 18% were non-verbal due to their disability and 6% that spoke English, spoke less than "very well".

## ***Demographic Analysis of the Region***

Western Riverside County has a population of 2,097,923 (81% of the total population of Riverside County) with 242,875 residents of Western Riverside County having limited-English Proficiency. In Western Riverside County there are 210,423 people with a disability and 27% of that population lives in poverty. The population of Riverside County residents with disabilities has grown by 5.9% from 2014 to 2018. The estimated number of Riverside County residents that speak a language other than English less than "very well" is approximately 15% of the population, with Spanish speakers comprising 83% of that group.

## ***Outreach Methods to Engage Minority and Limited English Proficient Populations***

EXCEED is a federally recognized 501(c)(3) non-profit organization that provides a range of essential services for adults with intellectual and other disabilities.

Programs include a 14 bed residential facility, Adult Developmental Centers, Community Integrated Services Program, Exploration & Enrichment Services, External Situational Assessments and Supported Employment Programs.

EXCEED serves adults with developmental and other disabilities through the Regional Center system and the Department of Rehabilitation as a contracted service provider. Although EXCEED does not serve the general public directly, we refer anyone with an interest in our services to Inland Regional Center (IRC) or the Department of Rehabilitation (DOR). As such, we work in conjunction with IRC and other agencies to achieve various outreach opportunities.

EXCEED is also licensed through State of California Department of Social Services, Community Care Licensing for the Residential Program and the Adult Developmental Centers and certified by the State of California Department of Developmental Services for the Community Programs and by The Department of Rehabilitation for Supported Employment Programs. The Situational Assessment Program, Personal, Vocational and Social Adjustment Program and Supported Employment Programs are accredited by Commission on the Accreditation of Rehabilitation Facilities (CARF).

EXCEED residents and program participants primarily have developmental and intellectual disabilities which cause them to function at a low to moderate cognitive level. While it is beyond the scope of this agency to measure specific literacy skills, program participants generally require a high level of supervision and have little to no literacy skills. Generally, any documents presented to clients are translated orally due to the level of disability.

Additionally, some program participants have not mastered basic work skills and are unable to earn any income.

Most EXCEED program participants receive SSI benefits, which are largely determined by their limited resources and income.

Given the relatively small size of the program and its limited exposure, the scope and provision of transportation services would have an insignificant impact on the general public, and minority and low-income populations in the geographic area.

Our agency does maintain systems to gather stakeholder input regarding agency services and conducts public relations and outreach activities in order to create meaningful opportunities for public engagement as outlined below. We send out annual surveys to parents and care providers and transportation users in English and Spanish, we conduct program participant surveys every 6 months, employ case manager and direct service staff that speak Spanish (and other languages), and hold virtual parent/care provider meetings with a Spanish interpreter on hand.

EXCEED partners with numerous organizations within our local communities to conduct public outreach and have members of our outreach team that speak Spanish. We also provide most of our outreach materials in English and Spanish and attend a number of events every month.

## **Summary of Outreach Efforts to Engage Minority and Limited English Proficient Populations**

The following is a summary of outreach efforts conducted by EXCEED 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 with the communities we serve. This is in no way a complete list but rather documents the agency's outreach efforts as they relate specifically to minority, low-income, disability and low English proficiency populations.

### ***Riverside County Office of Emergency Services***

EXCEED has worked in conjunction with the Riverside County Office of Emergency Services to establish an MOU that states that the RCOES will be able to use EXCEED vehicles in an emergency once EXCEED clients are safe and stable. In the event of an emergency, The Riverside County Office of Emergency Services will work collaboratively with EXCEED to meet the needs of its citizens. This means that the County of Riverside will also enlist the service of EXCEED vehicles in the event of an emergency. This plan specifically addresses the needs of populations at risk including disabled, minority and low-income.

### ***Inland Regional Center***

EXCEED participates in many events with our Inland Regional Center partner including well-attended Transition Fairs throughout the local School District offices where we are able to connect with families of children with disabilities that are preparing to leave high school and enter adulthood;

### ***Community Events***

EXCEED participates in many Chambers of Commerce and local community partner events. Local Healthcare/Health Fair/City events enable us to reach out to low-income and diverse populations. When attending events, we typically have a Spanish speaking staff person available.

### ***Service Clubs***

Staff members and Board members of EXCEED are active in a variety of service clubs throughout Riverside County, all of which serve minority populations in some way.

### ***EXCEED Website***

Currently, EXCEED posts notices and announcements on the agency's website. Additional public input can be obtained through the Title VI Complaint Form, which is available in English and Spanish. We also have a dedicated email address [info@weexceed.org](mailto:info@weexceed.org), for all EXCEED inquiries.

### ***EXCEED Marketing Committee***

The agency also maintains a Marketing Committee that meets on at least a quarterly basis and sets annual marketing and outreach goals. Various outreach activities are conducted throughout the year to educate the community on the resources that EXCEED provides to adults with disabilities. These activities include presentations to church members, service clubs or any group requesting a presentation. If content translation is needed at a presentation, every effort is made to have a Spanish speaking staff person attend. The hope with any presentation is that a dialogue can occur so that participants understand the services that are available. Other vehicles of communication include newsletters, open houses and press releases. At any time, if a person has a question and calls the agency to clarify questions about the services provided, every effort is made to answer questions to the satisfaction of the caller.

## **Limited English Proficiency (LEP) 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 EXCEED program, activity, or service.

**Factor 2:** The frequency with which LEP persons come in contact with the EXCEED program, activity or service.

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

**Factor 4:** The resources available to EXCEED and the 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 implementation.

### ***Purpose of the Language Assistance Plan***

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

**Executive Order 13166**, titled "Improving Access to Services for Persons with Limited English Proficiency," forbids funding recipients from "restricting an individual in any way in the enjoyment of any advantage or privilege enjoyed by others receiving any service, financial aid, or other benefit under the program," or from "utilize[ing] criteria or methods of administration which have the effect of subjecting individuals to discrimination because of their race, color, or national origin, or have the effect of defeating or substantially impairing accomplishment of the objectives of the program as respects to individuals of a particular race, color, or national origin."

**FTA Circular 4702.1B** was developed by the Federal Transit Administration (FTA) and details the administrative and reporting requirements for recipients of FTA financial assistance to comply with Title VI and related executive orders including on LEP.

The United States Department of Transportation (DOT) published guidance that directed its recipients to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for LEP customers. EXCEED's language assistance plan (LAP) includes a four factor analysis and implementation plan that complies with the requirements of DOT LEP guidance.

### ***Four Factor Analysis***

#### **Factor 1: The number or proportion of LEP persons in the service area who may be served or are likely to encounter the EXCEED program, activity, or service.**

EXCEED holds a unique position in regards to meeting the Title VI requirements. As a sub-recipient of FTA 5310 grant funds, the agency's focus is primarily to transport adults with disabilities where current public transit options are insufficient or do not exist.

Eligible EXCEED program participants or "riders" must be referred into the program from Inland Regional Center (IRC). As such, EXCEED does not offer transportation to the general public other than in an emergency as outlined in an MOU with the Riverside County Office of Emergency Services. Therefore, an analysis of public demographic data in Riverside 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 EXCEED. The IRC "Purchase of Service Expenditure and Demographic Data for fiscal year 2018/2019" shows IRC purchase of service (POS) authorizations, expenditures and utilization by different demographic categories including language. EXCEED receives case histories of served clients and maintains a database of pertinent information. A 5 year historical analysis of this data in regard to language proficiency 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 2,281,746 Riverside County residents, 938,885 speak a language other than English. The total number of non-English speakers that speak English less than "Very Well" is 342,543 or 15% of the total population of Riverside County.

<b>Riverside County California</b>	<b>Population Estimate</b>	<b>Percentage</b>
Total Population over 5 yrs of age	2,281,746	
Speak only English	1,342,861	58.9%
Speak a Language other than English	938,885	41.1%
Spanish Speaking	779,766	34.2%
Speak English less than "Very Well"	284,348	12.5%
Other Languages	159,119	7.0%
Speak English less than "Very Well"	58,195	2.6%

### ***Inland Regional Center (IRC) Expenditures***

The IRC Purchase of Service and Demographic Data Report for Fiscal Year 2021-2022 identifies the total annual number of people authorized to receive services. The report shows expenditures and consumer count 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 Riverside County analysis above, Spanish is consistently the primary language for LEP populations. The data from Inland Regional Center is broken down by age groups. EXCEED clients are included in the "22 and older" category as EXCEED is a provider of services purchased by IRC.

The report indicates that authorized services for those consumers 22 and older in FY 2021-2022 totaled 116,431. Of that total, 13,003 (79.1%) were English speaking and 3,104 (18.9%) were Spanish speaking. Total consumers speaking all other languages (33) totaled 2%.

<b>Language</b>	<b>All Ages</b>	<b>22 &amp; Older</b>	<b>Percentage</b>
Total clients eligible for services	45,242	16,431	
English Speakers	36,821	13,003	79.1%
Spanish Speakers	7,814	3,104	18.9%
All other Languages (33)	607	324	2.0%

### ***Historical Analysis of LEP Persons Served by EXCEED***

A final source of data to be considered to determine the number of EXCEED clients likely to be served is a client-by-client analysis. EXCEED serves approximately 600 persons during any given year. Of that total in 2021, 37% identified as Hispanic, 20% African-American, and 39% identified as Caucasian. Other ethnicities (Asian, Pacific Islander, Native American and Other) made up 4% of the EXCEED population.

As of June 30, 2021, our consumers by language were 89% English, 7% Spanish and 4% American Sign Language. In an analysis of the language proficiency of those 7% Spanish Speakers, 76% of those spoke English "very well", 18% were non-verbal due to their disability and 6% that spoke English, spoke it less than "very well".

Clients of EXCEED who speak English or any other language less than "very well" typically have developmental or other disabilities that cause barriers to speaking at all. **Therefore, this clientele experiences limited English proficiency because of their developmental disabilities rather than their inability to speak English well.** Because of their disability, many cannot read or write, thus, translation of vital documents into a native language is generally not needed. When vital information needs to be relayed, it is done orally or through ASL.

An examination of clients who have exited the program reveals that clients exited primarily because of their level of disability. There were no clients that were underserved or exited the program due to language barriers.

### **Factor 2: The frequency with which LEP persons come in contact with the EXCEED program, activity or service.**

As indicated above, historically, contact with LEP clients has not yet occurred at EXCEED. However, a survey of the agency's phone reception staff indicated calls from LEP persons are received a few times a year. The staff indicated that these calls are primarily received from people investigating job opportunities rather than clients (riders).

Annual and semi-annual client reviews provide an opportunity for input and suggested services. Requests by clients for translation services has occurred rarely, if ever, since many of the clients served are illiterate. In the event that a person who is visiting the campus needs translation, a Spanish speaking staff member would intercede and translate as necessary.

### **Factor 3: The nature and importance of programs, activities or services provided by EXCEED to the LEP population;**

The primary purpose of EXCEED is to provide quality services to the individuals placed in its care. Transportation to day program, employment, medical appointments, community events and other activities is a vital to the agency's ability to deliver its mission. EXCEED served 685 clients during the 2020-2021 fiscal year.

Approximately half of our clients have no active family in their lives – they live in group homes or independently. The staff and other residents have become their family. The primary cause for a person's exit from EXCEED usually stems from a significant change in a client's medical or behavioral status.

### **Factor 4: The resources available to EXCEED and the overall cost to provide LEP assistance.**

The EXCEED operating budget is \$ 8.0 million and does not have a specific line item for providing language access and outreach since the population currently, and historically served, has a very low concentration of LEP persons as discussed in Factors 1 and 2. Costs for translation of documents are minimal and has not been quantified. American Sign Language instruction is included in EXCEED's training curriculum and provided to interested staff at no cost.

General outreach efforts to promote the mission of EXCEED are conducted by the Chief Executive Officer, the Director of Marketing & Resource Development and the Directors of Training Center Programs in the day to day duties of their jobs. Although EXCEED does not have an LEP specific budget line, language assistance and LEP are part of its regular service provision and marketing efforts.

EXCEED has a staff member manage its website and the contents therein. In the course of doing so, the agency maintains current information related to Title VI requirements: The Notice to the Public, the Complaint Policy and a downloadable complaint form in both English and Spanish. If a staff member comes in contact with a family member who needs Spanish translation, there are enough bilingual staff available throughout the EXCEED to accommodate this need in a timely manner. As more LEP persons receive services at EXCEED, appropriate accommodations will be made in the budget to meet these changing needs.

As outlined in the "Summary of Outreach Efforts" section of this document (page 12), EXCEED collaborates with a number of service clubs, County departments and business associations that serve LEP populations. These partnerships create a very low cost referral source for EXCEED and the entities as well.

### ***Summary***

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

- In 2021, 7% of our clients identified as Spanish Speaking.
- No "true" LEP persons have been served by EXCEED in the last five years.
- Language proficiency is primarily affected by disability rather than a language barrier alone.
- No clients were underserved or exited the program due to language barriers.
- Surveyed agency staff reported a few calls a year from LEP persons and those were seeking employment rather than EXCEED services.
- Providing transportation services to clients is vital to quality care, but the client's inability to speak does not hinder quality of service provided.
- EXCEED does not have an LEP specific budget line.
- EXCEED complies with the requirements outlined by Title VI.

### ***Language Assistance Implementation Plan Methodologies***

#### ***Identifying LEP Individuals***

While the predominant minority language in the region is Spanish, the Four Factor Analysis reveals that there have been no "true" LEP individuals referred to EXCEED through the primary referral source, Inland Regional



Center. The clients served by EXCEED have disabilities that affect language proficiency rather than a language barrier.

### ***Providing Services***

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

Title VI Notice to the Public	Title VI Complaint Form	Title VI Complaint Procedures
Client Handbook	The Road to Independence	Fact Sheet
Intake Agreement	Tablet Loan Agreement	Mission, Vision, Values, Statement

Other documents can be translated to Spanish, orally, as appropriate. Due to the low literacy rate of consumers at EXCEED, most documents are translated orally.

### ***Communicating Availability of Language Assistance***

EXCEED services are provided on-site and in the community and program participants are referred by the Department of Rehabilitation or Inland Regional Center. Upon referral to our program, access to translation services is communicated to the program participant and their family member or care provider. In addition, all EXCEED facilities have staff available during regular business hours for translation services for clients, family members or others as needed. The weexceed.org website also contains information about who to call if Spanish translation is needed to understand services provided by EXCEED.

### ***Monitoring***

EXCEED will update the LEP Plan as required per FTA Title VI Circular 4702.1B and Caltrans State Management Plan. At a minimum, the plan will be reviewed and updated when it is clear that a higher concentration of LEP individuals are present in the community at EXCEED.

### ***Employee Training***

EXCEED conducts monthly In-Service training for staff on a variety of topics. Effective ways to communicate with clients who have limited language proficiency is discussed on a regular basis. Communication training is also conducted in each facility to meet the specific communication needs of each client receiving services.

### ***Safe Harbor Provision***

The Federal Transit Authority Circular 4702.1B states:

*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, EXCEED serves individuals with moderate to severe developmental disabilities who require a high level of supervision. As such, the majorities of clients have very limited literacy skills and are unable to read or write. Program documents are generally interpreted orally by staff members at each facility.

## **Table Depicting Racial Breakdown of transit-Related, Non-Elected Committees and Councils**

EXCEED does not have a non-elected transit related advisory council at this time.

## **Title VI Equity Analysis**

EXCEED does not have transit related facilities.

## **Monitoring and Providing Assistance to Subrecipients**

EXCEED does not have any subrecipients.

## **Board Resolution Approving the EXCEED Title VI Plan**

Board of Director's Approval of EXCEED's Title VI Plan

RESOLUTION No: 01-26-2021

A Resolution of the Board of Directors of Valley Resource Center for the Retarded Inc. dba EXCEED, Affirming and Approving the 2021 Title VI Program.

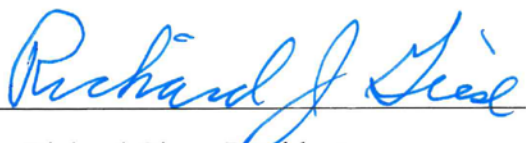
WHEREAS, Pursuant to Title VI of the Civil Rights Act of 1964, 42 U.S.C. §2000d et seq ("the Act") and 49 CFR Part 212, the U.S. Department of Transportation and the Federal Transit Administration (FTA) prohibit discrimination on the basis of race, color or national origin; and

WHEREAS, as a recipient of federal funds, Valley Resource Center for the Retarded Inc. dba EXCEED, is required to comply with the requirements of the Act and applicable implementing regulations; and

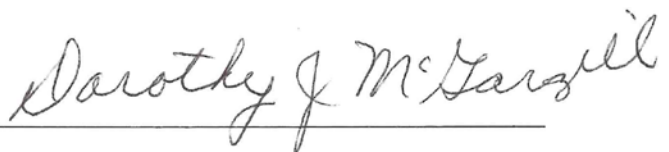
WHEREAS, pursuant to FTA Circular 4702.1B, Valley Resource Center for the Retarded Inc. dba EXCEED, is required to submit its Title VI Program to its governing entity for approval.

NOW THEREFORE, BE IT RESOLVED by the Board of Directors of Valley Resource Center for the Retarded Inc. dba EXCEED, does hereby affirm and approve EXCEED's 2021 Title VI Program as set forth in the attachment entitled 2021 EXCEED Title VI Program.

PASSED and ADOPTED this 26<sup>th</sup> day of January 2021.



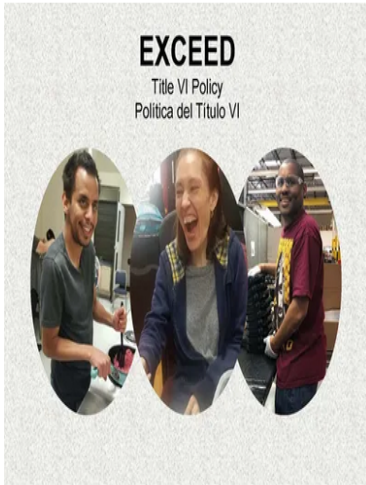
Dr. Richard Giese, President



Dorothy McGargill, Secretary

## Appendix I

### Website Screenshots



#### Title VI Notice to the Public

##### Notifying the Public of Rights Under Title VI

EXCEED operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with EXCEED.

For more information on EXCEED's civil rights program, and the procedures to file a complaint, contact 951-658-0000 x 262 or email [sandraaldridge@weexceed.org](mailto:sandraaldridge@weexceed.org); or visit our Administration office at 1285 N. Santa Fe, Hemet, CA 92543 For more information, visit <https://weexceed.org/titlevi>

A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.

If information is needed in another language, contact 951-658-0000 x 262



#### Aviso del Título VI al público

[HOME](#) [PROGRAMS](#) [HOW YOU CAN HELP](#) [COVID-19 RESOURCES](#) [NEWS](#) [PHOTO GALLERY](#)

#### Notificar al Público de los Derechos Bajo el Título VI

EXCEED opera sus programas y servicios, sin distinción de raza, color y origen nacional, de conformidad con el Título VI de la Ley de Derechos Civiles. Cualquier persona que cree que el o ella ha sido agraviada por cualquier práctica discriminatoria ilegal bajo el Título VI, puede presentar una queja ante EXCEED.

Para obtener mas información sobre la EXCEED programa de derechos civiles, y los procedimientos para presentar una queja, contacte 951-658-0000 x 262 o por correo electrónico [sandraaldridge@weexceed.org](mailto:sandraaldridge@weexceed.org); o visite nuestra oficina de Administración en 1285 N. Santa Fe, Hemet, CA 92543. Para obtener mas información, visite <https://weexceed.org/titlevi>

El demandante puede presentar una queja directamente con la Administración Federal de Transporte mediante la presentación de una queja ante la Oficina de Derechos Civiles, Atención: Coordinador de Programa del Título VI, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590 .

Si se necesita información en otro idioma, comuníquese con 951-658-0000 x 262