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**COUNTY OF LOS ANGELES  
 WORKFORCE DEVELOPMENT, AGING  
 AND COMMUNITY SERVICES**

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*"Connecting communities and improving the lives of all generations"*



wdacs.lacounty.gov  
 Cynthia D. Banks  
 Director  
 Otto Solórzano  
 Chief Deputy

December 04, 2018

The Honorable Board of Supervisors  
 County of Los Angeles  
 383 Kenneth Hahn Hall of Administration  
 500 West Temple Street  
 Los Angeles, California 90012

Dear Supervisors:

**ADOPTED**

BOARD OF SUPERVISORS  
 COUNTY OF LOS ANGELES

24 December 4, 2018

CELIA ZAVALA  
 EXECUTIVE OFFICER

**DELEGATE AUTHORITY TO EXECUTE NEW FREEDOM (NF): DOOR-ASSISTANCE  
 TRANSPORTATION PROGRAM (DATP) SUBAWARD WITH AMBIANCE TRANSPORTATION,  
 LLC AND TO APPROVE THE TITLE VI PLAN  
 (ALL SUPERVISORIAL DISTRICTS) (3 VOTES)**

**SUBJECT**

Workforce Development, Aging and Community Services (WDACS) seeks delegated authority from your Board to execute a subaward with Ambiance Transportation LLC to implement the New Freedom: Door-Assistance Transportation Program (NF: DATP). NF: DATP is a new, innovative transportation program in the County of Los Angeles (County) that provides countywide escort transportation services to older adults and adults with disabilities (Clients) to expand their mobility options when public transit is insufficient, inaccessible or unavailable to meet their needs. Escort transportation consists of door-to-door and door-through-door assistance.

In addition, WDACS seeks your approval of the attached Title VI Plan mandated by the Civil Rights Act of 1964 for all NF programs (NF: DATP, New Freedom Volunteer Driver Mileage Reimbursement Program (NF: VDMR) and New Freedom: Taxicab Services Program (NF: TSP)). As a recipient of federal funding through the Federal Transit Authority (FTA), WDACS is required to abide by Title VI, which requires that "no person shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal assistance."

**IT IS RECOMMENDED THAT THE BOARD:**

1. Delegate authority to the Director of WDACS, or designee, to execute a subaward with Ambiance Transportation, LLC for the provision of NF: DATP services for a contract term effective January 1,

2019 through September 26, 2020, for \$1,073,820, with an option to extend for an additional one (1) year term, upon Board approval and County Counsel approval of the contract as to form.

2. Delegate authority to the Director of WDACS, or designee, to execute any future amendments with the subrecipient as follows: 1) add new, relevant or updated federal, State, and/or County subaward terms; 2) increase or decrease the subaward amounts that may exceed 10% based on the availability of funding and/or based on subrecipient's performance provided that: (a) the total allocation does not exceed available funding and (b) WDACS obtains County Counsel approval as to form of the amendment prior to any such amendment; and 3) accept and allocate any new or additional funding for New Freedom transportation programs. These actions will ensure full expenditure of New Freedom funds and are consistent with your Board's policy requiring review of each service provider's performance. WDACS shall provide written confirmation to your Board and CEO within thirty (30) working days of completing these actions.

3. Delegate authority to the Director of WDACS, or designee, to approve and implement the attached Title VI Plan mandated by the Civil Rights Act of 1964 for all NF programs.

### **PURPOSE/JUSTIFICATION OF RECOMMENDED ACTION**

The recommended actions, if approved, will enable WDACS to execute a contract with Ambiance Transportation, LLC to implement the NF: DATP. WDACS conducted a transportation needs assessment targeting older adults and adults with disabilities, which identified lack of access to affordable, same-day transportation services as a major issue negatively impacting their quality of life. The total funding for the NF: DATP is \$1,073,820 for a term lasting through September 26, 2020.

This is the third NF program WDACS is implementing, in collaboration with the Los Angeles County Metropolitan Transportation Authority (LACMTA), to enhance transportation services to older adults and adults with disabilities. On August 8, 2017, your Board approved the New Freedom Volunteer Driver Mileage Reimbursement Program (NF: VDMR), which enables participants to select and recruit one or more volunteer drivers to aid in meeting their transportation needs. On November 14, 2017 your Board approved the New Freedom: Taxicab Services Program (NF: TSP), which provides participants with free taxi rides. There are no income requirements for NF services with priority of service reserved for elderly and disabled adults.

NF: DATP will complement and expand on these services by providing Door-Assistance Transportation services consisting of both door-to-door and door-through-door assistance to clients throughout the County.

Door-to-Door: A form of escorted transportation services that includes client assistance between the vehicle and the door of the client's residence or other approved destinations, but does not include the escort driver going inside the residence or their final destination.

Door-through-Door: A gatekeeper/hands-on service for clients with significant mobility limitations in which an escort driver assists the client through the doors of their residence or approved destinations and may provide assistance with their groceries and/or assisted mobility devices.

The County will refer potential clients to Ambiance Transportation, LLC, in addition to Ambiance recruiting clients. Ambiance Transportation, LLC will conduct a client assessment, determine eligibility and provide the required transportation needs and services. Transportation services will be

available to clients throughout the County. Clients will receive the needed special accommodations to ensure ADA accessible requirements (vans, ramps and wheelchair access).

Dedicated outreach and enrollment efforts will be conducted by WDACS staff through our vast aging and disability network, which includes other County departments that serve older adults, our Area Agency on Aging (AAA) program providers countywide, our fourteen (14) departmental Community and Senior Centers, and electronically through our New Freedom website. Once the program is fully implemented, we anticipate serving between 400 and 800 clients per month.

The recommended Title VI action, if approved, will bring WDACS into compliance with the Department of Justice and the Federal Transit Authority (FTA), which require all funding recipients to prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, or national origin: active investigations conducted by entities other than FTA; lawsuits; and complaints naming the recipient. As of the writing of this letter, no Title VI complaints of discrimination have been filed against WDACS. In addition, WDACS will implement and continuously re-evaluate its Title VI Plan to ensure all services provided through the NF programs are operated in a nondiscriminatory manner.

### **Implementation of Strategic Plan Goals**

The recommended actions support Countywide Strategic Plan Goal 1: Make Investments that Transform Lives, specifically, the following areas: (1) Strategy I.2 - Enhance Our Delivery of Comprehensive Interventions; (2) Objective I.2.7: Plan for Age-Friendly Communities for Older Adults; (3) Strategy II.3 - Make Environmental Sustainability Our Daily Reality; and (4) Objective II.3.5 Support a clean, flexible, and integrated multi-modal transportation system that improves mobility.

### **PERFORMANCE MEASURES**

The Program's success will be measured based on the indicators established by WDACS. These measures include the timeliness of the dispatch of transportation services, the number of trips for NF: DATP clients, and the cost-per-trip. Additionally, the County and the contractor will distribute Client Satisfaction Surveys to measure how the Program impacts the clients' quality of life.

Regarding Title VI, WDACS will maintain a list of any of the following that allege discrimination based on race, color, or national origin: active investigations conducted by entities other than FTA; lawsuits; and complaints naming the recipient.

### **FISCAL IMPACT/FINANCING**

There is no Net County Cost associated with the recommended actions. The NF: DATP is funded by the U.S. Department of Transportation Federal Transit Authority (DOT FTA) New Freedom Program. It is estimated that approximately \$1,073,820 will be available to fund the NF: DATP for the two years. Funding for the contractor is subject to the availability of funds, and the contractor's performance in meeting the goals and contract requirements of the NF: DATP. The Catalog of Federal Domestic Assistance number is 20.521.

### **FACTS AND PROVISIONS/LEGAL REQUIREMENTS**

On September 3, 2015, WDACS entered into a Memorandum of Understanding with the LACMTA to address gaps in the existing transportation network for older adults and persons with disabilities.

LACMTA is the pass-through entity of the DOT FTA. The MOU was amended on September 1, 2017.

As a federal funding recipient, WDACS is committed to the requirements mandated by Title VI of the Civil Rights Act of 1964.

### **CONTRACTING PROCESS**

On May 21, 2018, WDACS released a Request for Proposals (RFP) to procure contractors for the NF: DATP. The RFP was advertised in greater Los Angeles County newspapers, such as The Los Angeles Times, Los Angeles Daily News, San Gabriel Valley Tribune, Hoy, Long Beach Press Telegram, Antelope Valley Press, Daily Breeze and Los Angeles Sentinel. The RFP and all related documents were also posted and available on the WDACS and Internal Services Department (ISD) websites, which additionally notified approximately five-hundred (500) registered vendors.

One contractor, Ambiance Transportation, LLC, submitted a proposal to serve Supervisorial Districts 1, 3 and 5. Since there were no other bidders, WDACS negotiated with this contractor to also provide service in Supervisorial District 2 and 4. Ambiance Transportation indicated it had the capacity to provide this service countywide. WDACS staff visited the contractor's headquarters to verify their capacity to provide required services and were satisfied with the operation.

This contractor is being recommended for funding having met all the RFP requirements, and having agreed to expand their services to provide transportation services countywide. Ambiance Transportation has both the capability and capacity to provide these services countywide and is in compliance with all Board and CEO insurance requirements. It operates a green fleet taxicab program, which requires eighty percent (80%) of their vehicles to be hybrids. It has extensive experience in operating several Dial-A-Ride transportation services for elderly and disabled adults and has been providing its clients and passengers with medical, non-medical, emergency, non-emergency and paratransit services since 2010. It operates a fleet of over 70 vehicles and employs a workforce of approximately 100 vehicle operators and attendants. Its core mission is to provide services to the underserved community in the County. LACMTA has reviewed and approved the NF: DATP and the attached Title VI Plan.

### **MONITORING**

WDACS will ensure that the approved contractor will be monitored for contract compliance, and adherence to administrative, and programmatic requirements, through the Department's Contract Compliance Division. In addition, fiscal monitoring will be conducted by the Department of the Auditor-Controller.

### **IMPACT ON CURRENT SERVICES (OR PROJECTS)**

Transportation has been a major issue identified by older adults in the County, and this program will increase their access to important destinations, such as medical offices, grocery stores, and social functions. The NF: DATP complements the NF: VDMR which was approved by your Board on August 8, 2017, and the NF: TSP, which was approved by your Board on November 14, 2017.

### **CONCLUSION**

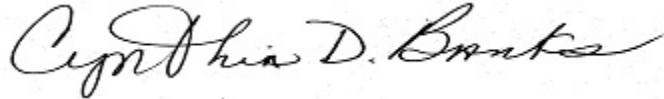
The Honorable Board of Supervisors

12/4/2018

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Should you have any questions, you may contact me directly, or your staff may contact Mr. Kevin Anderson, Special Assistant, at (213) 738-2593 or kanderson@wdacs.lacounty.gov

Respectfully submitted,

A handwritten signature in cursive script that reads "Cynthia D. Banks". The signature is written in black ink on a white background.

CYNTHIA D. BANKS

Director

CB:OS:PG:CD:RB

Enclosures

c: Chief Executive Officer  
County Counsel  
Executive Officer, Board of Supervisors



**Workforce Development, Aging and Community Services  
Title VI Civil Rights Program Policy**



# **TITLE VI PROGRAM**

COUNTY OF LOS ANGELES  
WORKFORCE DEVELOPMENT, AGING AND COMMUNITY SERVICES  
3175 West Sixth Street, Los Angeles CA 90020  
Tel: 213-738-2600





## Workforce Development, Aging and Community Services Title VI Civil Rights Program Policy



The County of Los Angeles, Workforce Development, Aging and Community Services (WDACS) department administers several programs to help enrich the lives of constituents residing in Los Angeles County, including Adult Protective Services (APS), Area Agency on Aging (AAA), Workforce Innovation and Opportunity Act (WIOA), Dispute Resolution, Community & Senior Centers, and Human Relations Commission. To further complement its range of services, WDACS has formulated the New Freedom program, which seeks to expand access to public transportation through mobility management and door-to-door or door-through-door demand-response transit.

As a federal funding recipient, WDACS is committed to the requirements mandated by Title VI of the Civil Rights Act of 1964, which requires that “No person shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal assistance.” As such, WDACS will implement and continuously re-evaluate its Title VI Program to ensure all services provided through the New Freedom program are operated in a nondiscriminatory manner.

### **Notice to the Public**

To make WDACS’ program participants aware of its commitment to Title VI compliance, and to their right to file a complaint, WDACS will have present the statement below on the Department’s website. All WDACS’ contractors providing services will be required to post the statement in client areas. The statement will also be posted in the lobbies of Los Angeles County Workforce Development, Aging and Community Services public access facilities.

#### **Workforce Development, Aging and Community Services Notice of Civil Rights**

The County of Los Angeles Workforce Development, Aging and Community Services (WDACS) department operates its programs and services without regard to race, color and/or national origin in accordance with Title VI of the Civil Rights Act. In addition to Title VI, WDACS prohibits discrimination based on sex, age, disability, religion, medical condition, gender or gender expression, marital status or sexual orientation. Any person who believes he or she has been aggrieved by any unlawful discriminatory practice may file a complaint with WDACS. For more information on WDACS’ Civil Rights program and procedures to file a complaint, please contact the Departmental Human Resources Manager at **(213) 738-2604**.

For transportation related issues, a complainant may file a complaint directly with the Federal Transit Administration by contacting the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5<sup>th</sup> Floor-TCR, 1200 New Jersey Avenue SE, Washington, D.C. 20590.



## Workforce Development, Aging and Community Services Title VI Civil Rights Program Policy



### **Discrimination Complaint Procedures**

The following complaint procedures will be available on our program website [www.newfreedom.lacounty.gov](http://www.newfreedom.lacounty.gov)

Any person who believes that he or she has been discriminated against on the basis of race, color, national origin, sex, age, disability, religion, medical condition, marital status, and/or sexual orientation by Los Angeles County Workforce Development, Aging and Community Services or any of its contracted service providers may file a discrimination complaint by completing and submitting the WDACS Discrimination Complaint Form. WDACS will investigate complaints received no more than 180 days after the alleged incident. WDACS will only process complaints that are complete.

Once a complaint is received, WDACS will review it to determine if its office has jurisdiction. The complainant will receive an acknowledgement letter informing him/her whether the complaint will be investigated.

WDACS has 30 days to investigate the complaint. If more information is needed to resolve the case, WDACS may contact the complainant with a letter requesting additional information. The complainant has 15 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 by the 30<sup>th</sup> business day following the request, WDACS can administratively close the case. A case may also be closed if the complainant no longer wishes to pursue the complaint.

After the investigator reviews the complaint, he or she 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 the case will be closed. An LOF summarizes the allegations and the interviews regarding the incident, and explains whether any disciplinary, or other, action will occur. If the complainant wishes to appeal the decision, he or she will have 30 days after the date of the closure letter or the LOF to do so.

For transportation related issues, a complainant may file a complaint directly with the Federal Transit Administration by contacting the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5<sup>th</sup> Floor-TCR, 1200 New Jersey Avenue SE, Washington, D.C. 20590.

If information is needed in another language, contact (213) 738-2604. (This portion will be provided in safe harbor languages as well.)





## Workforce Development, Aging and Community Services Title VI Civil Rights Program Policy



### **Title VI Discrimination Complaint Form**

The WDACS Discrimination Complaint Form will be available on WDACS' New Freedom website or can be requested from WDACS' Departmental Human Resources Manager. Complaint forms will be available in English and Spanish. Anyone filing a complaint may request that the form be translated into another language. The WDACS Discrimination Complaint Form can be found in **Appendix A**.

### **Active Investigations, Complaints, and Lawsuits**

The Department of Justice and the FTA require all recipients to prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, or national origin: active investigations conducted by entities other than FTA; lawsuits; and complaints naming the recipient. This list shall include the date that the investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by the recipient in response, or final findings related to, the investigation, lawsuit, or complaint. WDACS will maintain a list of active investigations conducted by entities other than FTA; lawsuits; and complaints with regard to discrimination during the implementation of its specialized transportation program. At the writing of this report, **no** Title VI complaints of discrimination have been filed against WDACS. A template for this investigation list is referenced in **Appendix B**.

### **Public Participation Plan**

WDACS has developed a public participation plan (PPP) to help guide the direction of its mobility management and transportation services. The plan provides a voice to the diverse population of Los Angeles County as the WDACS programs continue to evolve. WDACS found it important to consider public engagement from low-income, limited English proficient (LEP), and minority communities early in program development and continuously through the course of the program.

### **Public Hearings and Focus Groups**

As a countywide provider of services, WDACS, in collaboration with the City of Los Angeles, conducts public hearings at multiple locations representing the Los Angeles County area on an annual basis. During these hearings, members of the public can share their concerns with WDACS about the needs in their individual communities. Transportation services for the elderly and disabled were identified as a priority for WDACS during several of these public forums. To make the hearings accessible to low-income, minority, and LEP communities they are held in County or City senior, community, or multipurpose facilities which are commonly accessible via public transportation. They are conducted in buildings that are compliant with the Americans



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with Disability Act (ADA) and hearing notices inform residents of a number to call 72 hours in advance to request reasonable accommodations for disability, including assistive devices. Residents are notified through bulletins in community centers, libraries, senior centers, AAA contractors, and through newspaper ads 2-3 weeks in advance of the scheduled event. These notices are written in English and Spanish.

Additionally, the County and City of Los Angeles' Area Agencies on Aging conduct focus groups at various senior centers for our California Department of Aging 4-year Area Plan, which garnered many of the same conclusions pertaining to the need for non-fixed route, on-demand transportation services.

WDACS considered the comments and suggestions received from these public platforms in the development of its programs. Public feedback is critical in designing a program that meets the needs of communities, increases the likelihood of use; and, expands access to vital services.

As the program progresses, WDACS will utilize future public hearings and focus groups to help tailor the program's response to the diverse and changing needs of LA County residents, improve service delivery, and address service gaps specific to specialized public transit.

### **Outreach**

To date, WDACS has developed a New Freedom Program website (<http://newfreedom.lacounty.gov/>) as well as additional printed material (**Appendix C**).

- WDACS is committed to reaching a wide range of participants throughout the County by developing an outreach and referral campaign using different modes and media, such as posting of program flyers and information brochures in community and senior centers; social media; New Freedom Website; Toll free hotline
- Coordination for referrals from the Los Angeles County Aging & Adult Services Information & Referral hotline; and,
- Direct mail to WDACS' AAA providers for referral and distribution.

### **Continuous Improvement**

WDACS' programs will continue to involve the public as it will solicit feedback through client satisfaction surveys designed to provide detailed information on improving service delivery. This, in addition to registration data, public hearings, and future focus groups.



## Workforce Development, Aging and Community Services Title VI Civil Rights Program Policy



### LANGUAGE ASSISTANCE PLAN

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

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

Executive Order 13166, titled "Improving Access to Services for Persons with Limited English Proficiency," requires Federal agencies to examine the services they provide, identify any need for services to those with LEP, and develop and implement a system to provide those services so LEP persons can have meaningful access to them. It is expected that agency plans will provide for such meaningful access consistent with, and without unduly burdening, the fundamental mission of the agency.

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 LEP customers.

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. WDACS' Language Assistance Plan (LAP) includes two sections. The first section consists of a Four-Factor analysis and implementation plan that complies with the requirements of DOT LEP guidance. The second section of this document discusses the results of the Four-Factor Analysis and the implementation of the Language Assistance Plan.

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

To ensure program services are fully accessible by those persons of limited English Proficiency (LEP), WDACS has implemented the findings of a 'Four-Factor Analysis' in creating a language accessibility plan. The Four-Factor Analysis is a localized view of resident needs considering:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by WDACS' New Freedom Program;
2. The frequency with which LEP persons come into contact with WDACS' New Freedom Program materials and service providers;
3. The nature and importance of WDACS' New Freedom Program in people's



## Workforce Development, Aging and Community Services Title VI Civil Rights Program Policy



lives; and

4. The resources available to WDACS' New Freedom Program for LEP outreach, as well as the costs associated with that outreach.

**Factor 1** – The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient.

WDACS provides services to residents across the County of Los Angeles. Thus, its Four-Factor analysis takes into account the language needs of residents across the County's total geographical area. WDACS used the 2015 American Community Survey 5-Year Estimate to determine the proportion of LEP residents within the County of Los Angeles, by home language. The table below shows residents who identified themselves as speaking English less than "very well." It is categorized by the primary language of the resident. Percentages listed compare the proportion of the specific LEP group to the population of the County as a whole.

Los Angeles County		
		Speaks English Less Than Very Well
<b>Total Number of People:</b>	<b>9,396,753</b>	
<b>Spanish or Spanish Creole:</b>	<b>1,627,354</b>	<b>17.32%</b>
<b>Chinese:</b>	<b>219,912</b>	<b>2.34%</b>
<b>Korean</b>	<b>110,976</b>	<b>1.18%</b>
<b>Armenian:</b>	<b>84,435</b>	<b>0.90%</b>
<b>Tagalog:</b>	<b>73,397</b>	<b>0.78%</b>
<b>Vietnamese:</b>	<b>48,582</b>	<b>0.52%</b>
<b>Persian:</b>	<b>30,929</b>	<b>0.33%</b>
<b>Japanese:</b>	<b>25,857</b>	<b>0.28%</b>
<b>Russian:</b>	<b>25,344</b>	<b>0.27%</b>
<b>Arabic:</b>	<b>17,109</b>	<b>0.18%</b>
<b>Mon-Khmer, Cambodian:</b>	<b>16,883</b>	<b>0.18%</b>
<b>Other Indic languages:</b>	<b>16,005</b>	<b>0.17%</b>
<b>Thai:</b>	<b>13,569</b>	<b>0.14%</b>
<b>Other Asian languages:</b>	<b>10,113</b>	<b>0.11%</b>
<b>Other Pacific Island languages:</b>	<b>9,563</b>	<b>0.10%</b>
<b>French (incl. Patois, Cajun):</b>	<b>6,384</b>	<b>0.07%</b>
<b>African languages:</b>	<b>5,668</b>	<b>0.06%</b>
<b>Hindi:</b>	<b>4,902</b>	<b>0.05%</b>
<b>Hebrew:</b>	<b>4,632</b>	<b>0.05%</b>
<b>Other Indo-European languages:</b>	<b>3,882</b>	<b>0.04%</b>



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<b>Portuguese or Portuguese Creole:</b>	<b>3,160</b>	<b>0.03%</b>
<b>Urdu:</b>	<b>3,110</b>	<b>0.03%</b>
<b>Italian:</b>	<b>2,867</b>	<b>0.03%</b>
<b>Gujarati:</b>	<b>2,714</b>	<b>0.03%</b>
<b>German:</b>	<b>2,538</b>	<b>0.03%</b>
<b>Other and unspecified languages:</b>	<b>2,393</b>	<b>0.03%</b>
<b>Other Slavic languages:</b>	<b>2,003</b>	<b>0.02%</b>
<b>Laotian:</b>	<b>1,602</b>	<b>0.02%</b>
<b>Greek:</b>	<b>1,545</b>	<b>0.02%</b>
<b>Serbo-Croatian:</b>	<b>1,520</b>	<b>0.02%</b>
<b>Polish:</b>	<b>1,502</b>	<b>0.02%</b>
<b>Hungarian:</b>	<b>1,452</b>	<b>0.02%</b>
<b>Other West Germanic languages:</b>	<b>785</b>	<b>0.01%</b>
<b>Scandinavian languages:</b>	<b>755</b>	<b>0.01%</b>
<b>French Creole:</b>	<b>419</b>	<b>0.004%</b>
<b>Hmong:</b>	<b>343</b>	<b>0.004%</b>
<b>Yiddish:</b>	<b>243</b>	<b>0.003%</b>
<b>Other Native North American languages:</b>	<b>105</b>	<b>0.001%</b>
<b>Navajo:</b>	<b>25</b>	<b>0.0003%</b>

Source: American Community Survey 5-Year Estimate (2015)

This data indicates that an overwhelming portion of WDACS' potential participant pool may need language assistance in Spanish (17.32%). LEP populations identifying Chinese (2.34%), Korean (1.88%) and Armenian (0.90 %) as their primary language may also represent a significant frequency of WDACS' New Freedom participant pool.

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

WDACS collects language data for other programs it operates, including participants in Area Agency on Aging (AAA) and Adult Protective Service (APS) programs. Using enrolled participant intake data for these programs as a proxy, WDACS is able to indirectly project the frequency with which the New Freedom program will be in contact with LEP persons.



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### Area Agency on Aging

Primary Language of AAA Clients Served  
FY 2016-17

Primary Language	Client Count	Percent of Total Client Count	Translation Needed	
			Yes	Percent of Total
American Sign Language	102	0.24%	10	0.02%
Arabic	59	0.14%	12	0.03%
Armenian	533	1.24%	352	0.82%
Cambodian	117	0.27%	86	0.20%
Cantonese	645	1.50%	338	0.79%
Chinese	1,322	3.07%	336	0.78%
Declined to State	1,627	3.78%	16	0.04%
English	25,527	59.31%	340	0.79%
Farsi	72	0.17%	23	0.05%
French	14	0.03%	1	0.00%
Japanese	146	0.34%	51	0.12%
Korean	403	0.94%	203	0.47%
Laotian	22	0.05%	6	0.01%
Mandarin	426	0.99%	262	0.61%
Russian	295	0.69%	157	0.36%
Spanish	8,613	20.01%	4,488	10.43%
Tagalog	599	1.39%	41	0.10%
Thai	35	0.08%	4	0.01%
Vietnamese	119	0.28%	31	0.07%
Other	478	1.11%	93	0.22%
Missing	1,888	4.39%	15	0.03%
<b>Total</b>	<b>43,042</b>		<b>6,865</b>	

Analysis of the current participant base for Aging and Adult Service programs indicates that similar to the data from the 2015 American Community Survey 5-Year Estimate, Spanish speakers comprise the largest proportion (20.01 %) of AAA participants, with over half (10.43%) requesting translation services. Those with a primary language of Chinese make up the second largest portion of participants.



## Workforce Development, Aging and Community Services Title VI Civil Rights Program Policy



### Adult Protective Services

Primary Language of Alleged Victims  
FY 2016-17

Primary Language	Total Clients	Percent of Total
Arabic	28	0.08%
Armenian	199	0.54%
Chinese-Cantonese	108	0.29%
Chinese-Mandarin	139	0.38%
English	29,659	80.49%
Farsi	108	0.29%
Japanese	64	0.17%
Khmer (Cambodia)	26	0.07%
Korean	210	0.57%
Non-Verbal	202	0.55%
Russian	96	0.26%
Sign Language	35	0.09%
Spanish	3,830	10.39%
Tagalog	89	0.24%
Vietnamese	41	0.11%
Other	161	0.44%
Unknown	1,855	5.03%
<b>Total</b>	<b>36,850</b>	

Analysis of the current participant base for the Adult Protective Services indicates that Spanish speakers comprise the largest proportion (10.39%) of APS clients who speak a language other than English.

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

WDACS’ program seeks to serve the public, which includes the frail elderly and disabled populations, in two ways: The first is in serving as a resource to link clients with the variety of options necessary to be well integrated with society. Mobility Management will accomplish this by coordinating transportation services for clients through a network of available resources. The second is through contracting with non-profits, private, and public agencies to provide much-needed support and transportation services. As the elder population continues to grow and as more residents are limited in their ability to drive, the ability to access these programs will increase in importance. As such, the ability for WDACS to make such services available to LEP populations will also continue to grow.



## Workforce Development, Aging and Community Services Title VI Civil Rights Program Policy



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

Across the department, WDACS has multi-lingual staff that is able to provide translation, including 70 bilingual APS Field Operations Social Workers. WDACS has also previously obtained agreements with vendors for translation services with Lazar Translation Services and Magus Corp who can provide documentation translation at a cost of approximately \$2,500 per page of document.

### **Language Accessibility Plan**

WDACS is committed to ensuring participants are able to access services regardless of their ability to speak English and has developed a plan based upon gathering participant information, providing language assistance, and staff development.

### **Language Assistance**

Reflection on Factor 3 makes provision of language assistance to WDACS' participants very clear. Demographic data from the 2015 American Community Survey 5-Year Estimate as well as WDACS' AAA participant information (references Factors 1 and 2) clearly indicate that Spanish is a threshold language. As such, WDACS' participants will be provided with the following in-language resources:

- Nearly all printed materials in English/Spanish.
- To the extent possible, staff and contract services providers with translation software on mobile devices.
- Vital Documents such as the Title VI Discrimination Complaint form in WDACS' New Freedom public areas in Spanish.
- Vital Documents such as the Title VI Discrimination Complaint forms and procedures in Spanish, Chinese, Korean, Armenian, Vietnamese, Japanese, Russian, Cambodian, Thai, and Tagalog upon request.
- In-language phone assistance in other languages available depending on staff availability.
- Standard terms and conditions on all contracts states providers shall have multi-language staff capabilities

Individuals will be informed of these language assistance measures through a notice stating their availability in each language listed above. These notices will be available on the program website (<http://newfreedom.lacounty.gov/>).

In addition to the language assistance provisions above, WDACS' New Freedom will also strive to hire staff to provide in-language phone assistance in Spanish as well as provide staff regularly interfacing with LEP participants with sensitivity training. WDACS' New Freedom staff will also partner with APS Bilingual Social Workers for translation services





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as needed and available. WDACS' New Freedom Website is also designed with Google Translation capabilities. WDACS has also included contractual language for all department contracts indicating providers shall have multi-language staff capabilities.

WDACS' New Freedom will reassess the threshold every three years and make reasonable adjustments as updated data on language groups and participant information becomes available.

### **Safe Harbor Provision**

*The FTA Circular 4702.1B states, "DOT has adopted DOJ's Safe Harbor Provision, which outlines circumstances that can provide a "safe harbor" for recipients regarding translation of written materials for LEP populations. The Safe Harbor Provision stipulates that, if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with the recipient's written translation obligations. Translation of non-vital documents, if needed, can be provided orally. If there are fewer than 50 persons in a language group that reaches the five percent (5%) trigger, the recipient is not required to translate vital written materials but should provide written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost.*

*These safe harbor provisions apply to the translation of written documents only. They do not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable. A recipient may determine, based on the Four-Factor Analysis, that even though a language group meets the threshold specified by the Safe Harbor Provisions, 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."*

Although WDACS strives to adhere to the Safe Harbor Provision, WDACS operates from a limited budget, thus making it financially prohibitive to translate all vital documents that constitutes the lesser of 5% or 1,000 persons of the total population of persons eligible to be served or likely to encounter our transportation services. Given that, historically, the demographic served by WDACS falls primarily within the Spanish-speaking community, and the Notice to the Public, Discrimination Complaint Procedures and the Title VI Discrimination Complaint form are translated into Spanish. Additionally, upon request,



## Workforce Development, Aging and Community Services Title VI Civil Rights Program Policy



WDACS will provide translation of these documents into Chinese, Korean, Armenian, Vietnamese, Japanese, Russian, Cambodian, Thai, and Tagalog.

### **Monitoring and Evaluation**

To help better gauge the language needs of program participants, WDACS will gather and pre-analyze participant needs prior to providing service. The following delineates the steps that will be taken when a referral for a potential LEP client is received:

1. WDACS receives referral for participant including demographic, primary language, and secondary language information.
2. If the client needs language assistance that is not readily available, a mobility management consultation and assessment is scheduled.
3. WDACS will coordinate language assistance at the consultation by either sending bilingual staff when possible or equipping the staff member with strategies in using translation applications such as mobile web conferencing, etc.
4. Participant language data will be logged for further program analysis and to ensure language assistance is provided to the participant in the future.

WDACS strives to have multi-language staff as well as contractually obligate service providers to have multi-language staff and capabilities. WDACS' Compliance Division will verify service providers have multi-language staff and capabilities in place during their semi-annual monitoring visits. WDACS' Research and Statistics Section will collect language data for mobility management staff to further analyze. Primary language information is collected at the time of application through the New Freedom database.

### **Staff Training**

Current WDACS staff has been instrumental in developing the Language Assistance Plan and thus are very knowledgeable about the plan. Effective May 2018, New Freedom staff will have undergone the Implicit Bias and Cultural Competency training, and the County Policy of Equity training. The Implicit Bias and Cultural Competency training aims to heighten awareness of issues related to diversity, such as perception, cultural differences, language, stereotyping, sexual orientation and biases. The County Policy Equity training is designed to help employees understand their rights to be free from discrimination, unlawful harassment, retaliation, and other inappropriate conduct. The goal of this training is to help promote more inclusive work and service environments.

Future staff will be required to read the Language Assistance Plan, will be directed on the procedures for helping services those with language assistance needs, and will be involved with future iterations of plan development.



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### **Diagram of Non-Elected Officials**

WDACS does not have an unelected committee or council, therefore this requirement does not apply.

### **Title VI Equity Analysis**

WDACS did not use the New Freedom funds for the construction of a facility; therefore, this requirement does not apply.

### **Title VI Monitoring**

The results of the ongoing monitoring of services standards can be obtained by contacting WDACS' Departmental Human Resources Manager.

### **Sub-Recipient Compliance**

For transportation related programs, WDACS is contracted through Los Angeles County Metropolitan Transportation Authority (LACMTA).

### **Grants, Reviews and Certifications**

WDACS has no pending applications for federal assistance. It has no open or pending FTA grants. WDACS has not had any Civil Rights Compliance Reviews in the past three years.

### **Contact**

For additional information on WDACS' Title VI Plan, please contact: The Departmental Human Resources Manager, Los Angeles County Workforce Development, Aging and Community Services, 3175 West 6<sup>th</sup> Street, Los Angeles, CA 90020, 213.738.2604.

### **Appendices**



1. Appendix A – WDACS' New Freedom Program Discrimination Complaint Form
2. Appendix B – WDACS' New Freedom Program Complaint Log
3. Appendix C – WDACS' New Freedom Program Flyer



# Workforce Development, Aging and Community Services Title VI Civil Rights Program Policy



## APPENDIX – A

	County of Los Angeles – Workforce Development, Aging and Community Services <b>DISCRIMINATION COMPLAINT FORM</b>	
<b>SECTION I: COMPLAINANT INFORMATION</b>		
First Name:		Last Name:
Home Phone:		Work/Cell Phone:
Current address:		
City:	State:	ZIP Code:
<b>ACCESSIBLE FORMATS REQUIRED (CHECK ALL THAT APPLY)</b>		
<input type="checkbox"/> Large Print <input type="checkbox"/> Audio Tape <input type="checkbox"/> TOD <input type="checkbox"/> Other (Specify):		
<b>SECTION II: INFORMATION ON THIRD PARTY FILER</b>		
Are you filing this complaint on your own behalf (please circle)?      YES      NO		
If you answered "YES" to the question above, go to Section IV.		
If you answered "NO" please supply the name and relationship of the person for whom you are complaining:		
First Name:		Last Name:
Please explain why you have filed for a third party.		
Please confirm that you have obtained permission of the aggrieved party if you are filing on behalf of a third party (please circle).		
YES      NO		
<b>SECTION III: COMPLAINT HISTORY</b>		
Have you previously filed a discrimination complaint (please circle)?      YES      NO		
If yes, what was the complaint number?		Complaint number:
Please note: This information is needed for administrative purposes we will assign the same complaint number to the new complaint.		
Transit Provider:		
Department of Transportation:		
Department of Justice:		
Equal Employment Opportunity Commission:		
Other (be specific):		
Have you ever filed a lawsuit regarding your complaint (please circle)?		YES      NO
Please note: This information is helpful for administrative tracking purposes. However, if litigation is pending regarding the same issue, we defer to the decision of the court.		
<b>SECTION IV: DESCRIPTION OF DISCRIMINATION</b>		
Which of the following best describes the reason you believe the discrimination took place? Was it because of your (please check all that apply):		
<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin <input type="checkbox"/> Age <input type="checkbox"/> Gender or Gender Expression <input type="checkbox"/> Sex  <input type="checkbox"/> Disability <input type="checkbox"/> Religion <input type="checkbox"/> Marital Status <input type="checkbox"/> Sexual Orientation <input type="checkbox"/> Medical Condition		
On a separate sheet please describe your complaint. You should include specific details such as name, dates, times, witnesses, and any other information that would assist us in our investigation of your allegations. Please also provide any other documentation that is relevant to this complaint.		
This form continues on the back of this page or on the next sheet.		



# Workforce Development, Aging and Community Services Title VI Civil Rights Program Policy



## APPENDIX – A

SECTION V: RELEASE OF INFORMATION		
May we release a copy of your complaint to the transit provider (please circle)?	YES	NO
May we release your identity to the transit provider (please circle)?	YES	NO
SECTION VI: SIGNATURE		
Signature:		
Printed Name:		
Date:		
Note: We cannot accept your complaint without a signature.		

Please submit this form with attachments in person at the address below or mail the form to:  
 Departmental Human Resources Manager  
 WDACS  
 3175 6<sup>th</sup> Street  
 Los Angeles, CA 90020

Spanish Si usted necesita este formulario traducido, por favor contáctenos al (888)863-7411.

Chinese 如果您需要翻译此表格, 请联系我们 (888) 863-7411.

Korean 이 양식 번역 필요 하면, (888)863-7411 에 문의 하시기 바랍니다.

Vietnamese Nếu bạn cần mẫu đơn này dịch, xin vui lòng liên hệ với chúng tôi tại (888)863-7411.

Japanese このフォームの翻訳が必要な場合は、(888)863-7411 (お問い合わせください)。

Russian Если вам нужна эта форма перевода, пожалуйста, свяжитесь с нами по (888)863-7411.

Thai ถ้าคุณต้องการแบบฟอร์มนี้ โปรดติดต่อเราที่ (888)863-7411

Armenian Եթե Ձեր գործընկերության կարգիչ ունեք, խնդրում ենք կապվել մեզ (888) 863-7411 հեռախոսահամարով:

Tagalog Kung kailangan mo ang form na ito maisalin sa wikang tagalog, mangyaring makipag-ugnay sa amin sa (888)863-7411

Cambodian ប្រសិនបើអ្នកត្រូវការការបកប្រែទម្រង់នេះទៅជាភាសាខ្មែរ ទាក់ទងមកយើងផ្ដោសលេខ (888) 863-7411



# Workforce Development, Aging and Community Services Title VI Civil Rights Program Policy



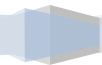
## APPENDIX – B



### WDACS New Freedom Title VI Program Complaint Investigation Log



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





## Workforce Development, Aging and Community Services Title VI Civil Rights Program Policy



### APPENDIX – C

#### WHO IS ELIGIBLE?

This program is available to anyone planning to travel within Los Angeles County; however, priority of service is reserved for individuals meeting the following criteria:

- Applicant is at least 60 years of age and/or
- Applicant is disabled

Program acceptance will be made on a first come first serve basis

#### WHERE CAN I GO?

Clients will be able to travel to any destination within Los Angeles County, including:

- Medical therapy and personal appointments;
- Grocery stores and other shopping destinations;
- Social and recreational events; worship services and other outings;
- Senior centers, recreation centers, and adult day programs;
- Employment, education, and volunteer sites.

#### HOW CAN I SELECT MY VOLUNTEER DRIVER?

Clients may select anyone they trust as a volunteer driver, such as a caregiver, neighbor, family member or friend.



**1-888-863-7411**

#### HOW DO I APPLY?

- Applicants may request a New Freedom application by e-mail at [newfreedom@wdacs.lacounty.gov](mailto:newfreedom@wdacs.lacounty.gov) or complete the application through the New Freedom website at: <http://newfreedom.lacounty.gov>
- Applicants may also call the New Freedom hotline at (888) 863-7411 to speak to a mobility specialist who can provide assistance. Mobility specialists are available Monday thru Friday from 8 am to 5 pm.





# Workforce Development, Aging and Community Services Title VI Civil Rights Program Policy



## APPENDIX – C



County of Los Angeles Workforce Development, Aging and Community Services has been granted funding to provide transportation programs throughout Los Angeles County. The program goal is to enhance transportation services provided to older adults and persons with disabilities at no cost to eligible clients.

We are pleased to announce the New Freedom Volunteer Driver Mileage Reimbursement Program in which eligible clients have the opportunity to select and recruit Volunteer Drivers to provide rides to designated destinations. The drivers are then reimbursed through the program.



Hilda L. Solis  
First District

Mark Ridley-Thomas  
Second District

Sheila Kuehl  
Third District

Janice Hahn  
Fourth District

Kathryn Barger  
Fifth District



Provided by  
**Workforce Development  
Aging and Community Services**

Funded by  
**U.S Department of Transportation  
Federal Transit Authority**



**Los Angeles County**

**Workforce Development  
Aging and  
Community Services**

**Volunteer Driver Mileage  
Reimbursement Program**



*Get where you need to go,  
and maintain your*

*Independence, health and  
well-being...*

**1-888-863-7411**

□