



United Ways serving  
San Bernardino County



# United Way 211-VetLink

## TITLE VI PROGRAM

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**Last Updated** March 16, 2018

**Approved by IEUW Board of Directors** June 13, 2018

## **I. Introduction**

This document was prepared by United Way 211-VetLink and was 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. 1B "Title VI Requirements and Guidelines for Federal Transit Administration Recipients" This Title VI program only applies to the VetLink program of United Way 211.

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## II. Title VI Notice to the Public

### A. Notifying the Public of Rights under Title VI

#### United Way 211-VetLink

United Way 211-VetLink is committed to ensuring that no person shall be excluded from the equal distribution of services because of race, color or national origin in accordance with Title VI of the Civil Rights Act of 1964.

- United Way 211-VetLink operates its services without regard to race, color, and national origin in full compliance with Title VI.
- Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with 211 San Bernardino County-VetLink. All complaints will be fairly and objectively investigated.
- To file a complaint, you may contact United Way 211-VetLink at (909) 980-2857 or visit our administrative office at, 9624 Hermosa Avenue, Rancho Cucamonga, CA 91730 or visit [211vetlink.org](http://211vetlink.org)
- For more information about United Way 211-VetLink's Title VI program and complaint procedure, contact (909) 980-2857; or visit United Way 211-VetLink's website: [211vetlink.org](http://211vetlink.org)
- A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the FTA Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5<sup>th</sup> Floor- TCR, 1200 New Jersey Ave., SE, Washington, DC 20590
- If information is needed in another language, contact (909) 980-2857

Español/Spanish	Si tiene preguntas acerca de 211-VetLink, usted tiene derecho a obtener información en su idioma, para hablar con un intérprete, llame al (909) 980-2857
فارسی/Persian	980-2857 (909) بگیریڈ تماس، کنید صحبت مترجم با، دارید خود زبان در را اطلاعات دریافت حق شما، دارید سوال 211-VetLink مورد در اگر
中文/Chinese	如果您对 211-VetLink 有疑问，您有权以您的语言获得信息，与口译员交谈，致电 (909) 980-2857
日本/Japanese	211-VetLink に関する質問がある場合は、あなたの言語で情報を入手する権利、通訳者と話す権利、電話 (909) 980-2857
한국어/Korean	211-VetLink 에 관해 궁금한 점이 있으시면 한국어로 정보를 얻거나 통역사와 통화 할 수있는 권리가 있습니다. 전화 (909) 980-2857
ไทย/Thai	หากคุณมีคำถามเกี่ยวกับ 211-VetLink คุณมีสิทธิ์ที่จะได้รับข้อมูลในภาษาของคุณเพื่อพูดคุยกับล่ามโทร (909) 980-2857
Tiếng Việt/Vietnamese	Nếu bạn có thắc mắc về 211-VetLink, bạn có quyền nhận thông tin bằng ngôn ngữ của bạn, để nói chuyện với một thông dịch viên, gọi số (909) 980-2857
Tagalog/Filipino	Kung mayroon kang mga katanungan tungkol sa 211-VetLink, mayroon kang karapatan na makakuha ng impormasyon sa iyong wika, upang makipag-usap sa isang interpreter, tumawag sa (909) 980-2857
عربي/Arabic	980-2857 (909) برقم الاتصال ، مترجم مع للتحدث ، بلغتك معلومات على الحصول في الحق فلدك ، 211-VetLink حول أسئلة لديك كان إذا

## ***B. Notificación al Público de los Derechos Bajo el Título VI***

### **United Way 211-VetLink**

United Way 211-VetLink se compromete a garantizar que ninguna persona será excluida de la distribución igualitaria de servicios a causa de raza, color y el origen nacional, en conformidad con el Título VI del Acta de Derechos Civiles de 1964.

- United Way 211-VetLink opera sus servicios sin tener en cuenta raza, color y origen nacional en plena conformidad con el Título VI.
- Cualquier persona que cree que él o ella ha sido agraviada por cualquier práctica discriminatoria ilegal bajo el Título VI puede presentar una queja a United Way 211-VetLink. Todas las quejas serán investigadas de manera justa y objetiva.
- Para presentar una queja, puede comunicarse con United Way 211-VetLink al (909) 980-2857 o visite nuestra oficina administrativa en 9624 Hermosa Avenue, Rancho Cucamonga, CA 91730
- Para obtener más información sobre el programa de Título VI de United Way 211-VetLink y el procedimiento para presentar una queja, llame al (909) 980-2857; o visite la página web de United Way 211-VetLink: 211vetlink.org
- Un demandante puede presentar una queja directamente con el Federal Transit Administration mediante la presentación de una queja ante el FTA Office of Civil Rights, Atención: Title VI Program Coordinator, East Building, 5th Floor - TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.

Español/Spanish	Si tiene preguntas acerca de 211-VetLink, usted tiene derecho a obtener información en su idioma, para hablar con un intérprete, llame al (909) 980-2857
فارسی/Persian	980-2857 (909) بگيريد تماس، كنيد صحبت مترجم با، داريد خود زبان در را اطلاعات دريافت حق شما، داريد سوال 211-VetLink مورد در اگر
中文/Chinese	如果您对 211-VetLink 有疑问，您有权以您的语言获得信息，与口译员交谈，致电 (909) 980-2857
日本/Japanese	211-VetLink に関する質問がある場合は、あなたの言語で情報を入手する権利、通訳者と話す権利、電話 (909) 980-2857
한국어/Korean	211-VetLink 에 관해 궁금한 점이 있으시면 한국어로 정보를 얻거나 통역사와 통화 할 수있는 권리가 있습니다. 전화 (909) 980-2857
ไทย/Thai	หากคุณมีคำถามเกี่ยวกับ 211-VetLink คุณมีสิทธิที่จะได้รับข้อมูลในภาษาของคุณเพื่อพูดคุยกับสามโทร (909) 980-2857
Tiếng Việt/Vietnamese	Nếu bạn có thắc mắc về 211-VetLink, bạn có quyền nhận thông tin bằng ngôn ngữ của bạn, để nói chuyện với một thông dịch viên, gọi số (909) 980-2857
Tagalog/Filipino	Kung mayroon kang mga katanungan tungkol sa 211-VetLink, mayroon kang karapatan na makakuha ng impormasyon sa iyong wika, upang makipag-usap sa isang interpreter, tumawag sa (909) 980-2857
عربي/Arabic	980-2857 (909) برقم الاتصال ، مترجم مع للتحدث ، بلغتك معلومات على الحصول في الحق فديك ، 211-VetLink حول أسئلة لديك كان إذا

### **III. List of locations where Title VI is posted**

United Way 211-VetLink's notice to the public is currently posted at the following locations:

Location Name	Address	City
United Way 211-VetLink office	9624 Hermosa Avenue	Rancho Cucamonga, CA 91730
Website	<a href="http://211vetlink.org">211vetlink.org</a>	

The Title VI notice and program information is also provided to all new and existing employees and participants.

#### **IV. Title VI Complaint Procedures (English)**

As a sub-recipient of federal dollars, the Inland Empire United Way's program United Way 211-VetLink (hereinafter referred to as "United Way 211-VetLink") is required to comply with Title VI of the Civil Rights Act of 1964 and ensure that services are provided on a non-discriminatory basis. This Title VI program only applies to the VetLink project of United Way 211. United Way 211-VetLink has in place a Title VI Complaint Procedure, which outlines a process for local disposition of Title VI complaints and is consistent with guidelines found in the Federal Transit Administration Circular 4702. 1B, dated October 1, 2012. The Complaint Procedures and Complaint Form are posted on our website at [211vetlink.org](http://211vetlink.org).

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by United Way 211-VetLink may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form. United Way 211-VetLink investigates complaints received no more than 60 days after the alleged incident. United Way 211-VetLink will only process complaints that are complete.

Within 30 business days of receiving the complaint, United Way 211-VetLink Title VI Administrator, will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office. United Way 211-VetLink 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, United Way 211-VetLink may contact the complainant. 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 within 15 business days, United Way 211-VetLink can administratively close the case.



A case can be administratively closed also if the complainant no longer wishes to pursue their case. After the investigator reviews the complaint, she/he will issue one of two letters to the complainant: a closure letter or a Letter of Finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. An LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member, or other action will occur. If the complainant wishes to appeal the decision, she/he has 30 days after the date of the closure letter or the LOF to appeal to the United Way 211-VetLink designee. The complainant is entitled to review the denial, to present additional information and arguments, and to a separation of functions (i. e. a decision by a person not involved in with initial decision to deny eligibility). The complainant is entitled to receive written notification of the decision of the appeal and the reasons for it.

The complainant may also file a complaint directly with the Federal Transit Administration, as follows: Title VI Program Coordinator, FTA Office of Civil Rights, East Building, 5<sup>th</sup> Floor-TCR, 1200 New Jersey Avenue, SE, Washington, DC 20590.

## A. Title VI Complaint Form (English)

<b>Section I: Please write legibly</b>		
1. Name:		
2. Address:		
3. Telephone:	3. a. Secondary Phone( <i>Optional</i> ):	
4. Email Address:		
5. Accessible Format Requirements?	<input type="checkbox"/> Large Print	<input type="checkbox"/> Audio Tape
	<input type="checkbox"/> TDD	<input type="checkbox"/> Other
<b>Section II:</b>		
6. Are you filing this complaint on your own behalf?	YES*	NO
*If you answered "yes" to #6, go to Section III.		
7. If you answered "no" to #6, what is the name of the person for whom you are filing this complaint? Name:		
8. What is your relationship with this individual:		
9. Please explain why you have filed for a third party:		
10. Please confirm that you have obtained permission of the aggrieved party to file on their behalf.	YES	NO
<b>Section III:</b>		
11. I believe the discrimination I experienced was based on ( <i>check all that apply</i> ):  <input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin		
12. Date of alleged discrimination: ( <i>mm/dd/yyyy</i> )		
13. Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known), as well as names and contact information of any witnesses. If more space is needed, please attach additional sheets of paper		

<b>Section IV:</b>		
14. Have you previously filed a Title VI complaint with United Way 211-VetLink?	YES	NO
<b>Section V:</b>		
15. Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?		
[ ] YES* [ ] NO		
If yes, check all that apply:		
[ ] Federal Agency _____	[ ] State Agency _____	
[ ] Federal Court _____	[ ] Local Agency _____	
[ ] State Court _____		
16. If you answered "yes" to #15, provide information about a contact person at the agency/court where the complaint was filed.		
Name:		
Title:		
Agency:		
Address:		
Telephone:	Email:	
<b>Section VI:</b>		
Name of Agency complaint is against:		
Contact Person:		
Telephone::	Email:	

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

Signature and date are required below to complete form; by signing you agree that all the information herein is accurate and truthful.

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

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

Gary Madden  
Director, United Way 211  
Title VI Administrator  
United Way 211-VetLink  
9624 Hermosa Avenue  
Rancho Cucamonga, CA 91730

## **V. Procedimiento para Queja - Título VI (Español)**

Como sub-recipiente de fondos federales, el programa de Inland Empire United Way, United Way 211-VetLink (en lo sucesivo, "United Way 211- VetLink") es necesario para cumplir con el Título VI de la Ley de Derechos Civiles de 1964 y garantizar que los servicios se proporcionan en base no discriminatoria. Este programa Título VI sólo se aplica al proyecto VetLink de United Way 211. United Way 211-VetLink tiene un Procedimiento de Queja Título VI, que describe un proceso para la disposición local de las quejas del Título VI y está en consonancia con las directrices que se encuentran en la Administración Federal de Tránsito 4702. 1B Circular, de fecha 1ro de Octubre de 2012. Los Procedimientos de Reclamación y Formulario de Queja se publican en nuestro sitio web [211vetlink.org](http://211vetlink.org)

Cualquier persona que cree que él o ella ha sido objeto de discriminación por motivos de raza, color u origen nacional por United Way 211- VetLink puede presentar una queja del Título VI, completando y enviando el Formulario de Queja Título VI de la agencia. United Way 211- VetLink investiga quejas recibidas no más de 60 días después del supuesto incidente. United Way 211- VetLink solo investiga quejas cuyas formas se someten completas. Dentro de los 30 días hábiles de haber recibido la queja, el administrador del United Way 211- VetLink Título VI, la revisará para determinar si nuestra oficina tiene jurisdicción. El denunciante recibirá una carta de reconocimiento a él/ella informando si la denuncia será investigada por nuestra oficina. United Way 211- VetLink tiene 30 días para investigar la denuncia. El demandante será notificado por escrito de causa a cualquier extensión prevista a la norma de los 30 días.

Si se necesita más información para resolver el caso, United Way 211-VetLink puede ponerse en contacto con el denunciante. El demandante tiene 15 días hábiles desde la fecha de la carta para enviar información solicitada al investigador asignado al caso. Si el investigador no está en contacto con el denunciante o no recibe la información adicional dentro de los 15 días hábiles, United Way 211- VetLink puede cerrar el caso administrativamente.

Un caso puede ser administrativamente cerrado también Si el demandante ya no desea seguir su caso. Después de que el investigador revisa la queja, él/ella emitirá una de las dos cartas a el denunciante: una carta de cierre o una carta de falla (LOF). Una carta cierre resume las acusaciones y afirma que no hubo una violación del Título VI y que el caso se cerrará. Una LOF resume los hechos denunciados y las entrevistas sobre el presunto incidente, y explica

Si alguna acción disciplinaria, formación adicional del funcionario, o de otra acción voluntaria. Si el demandante desea apelar la decisión, él/ella tiene 30 días después de la fecha de la carta de cierre o la LOF de apelar a United Way 211-VetLink Advisory o su representante. El denunciante tiene derecho a revisar la negación, de presentar información y argumentos adicionales, y para una separación de funciones (es decir, una decisión de una persona ajena a la decisión inicial de negar la elegibilidad). El demandante tiene derecho a recibir una notificación por escrito de la decisión de la apelación y las razones para ello El demandante también puede presentar una queja directamente con la Administración Federal de Tránsito, de la siguiente manera: Coordinador de Programa del Título VI, FTA Oficina de Derechos Civiles, East Building, 5th Floor - TCR, 1200 New Jersey Avenue, SE, Washington, DC 20590.

## A. Formulario de Queja (Español)

<b>Sección 1: Por favor escriba en letra legible</b>		
1. Nombre:		
2. Domicilio:		
3. Teléfono:	3. a. Teléfono alterno (opcional):	
4. Correo Electrónico:		
5. ¿Usted requiere formatos accesibles? ¿Cuáles?:	<input type="checkbox"/> Letra Grande	<input type="checkbox"/> Cinta de Audio
	<input type="checkbox"/> TDD	<input type="checkbox"/> Otra
<b>Sección 2:</b>		
6. Es esta queja en su propia representación? *Si: No: (*Si marcó que "Si" pase a la Sección 3)		
7. Nombre y Domicilio		
8. Su relación con la persona presentando la queja:		
9. Explique la razón por la que presenta la queja como tercera persona:		
10. Confirme que cuenta, con el permiso de la parte agravada para presentar esta queja como tercera persona:	SI	NO
<b>Sección 3:</b>		
11. ¿Cuáles de las siguientes razones describe mejor el motivo de su queja? Fue por su: (Marque todas las que apliquen) <input type="checkbox"/> Raza <input type="checkbox"/> Color <input type="checkbox"/> Origen nacional		
12. ¿Cuándo ocurrió la supuesta discriminación?		
13. En sus propias palabras, describa la supuesta discriminación. Explique lo que pasó y quién considera usted que fue responsable. Por favor utilice el reverso de este formulario Si necesita espacio adicional.		

<b>Sección 4:</b>			
14. ¿Cuenta con alguna queja previa sobre discriminación según el Título VI con United Way 211-VetLink?	Sí, por este incidente	Sí, por otro incidente	No
<b>Sección 5:</b>			
15. ¿Ha llevado esta queja a alguna otra agencia o a una corte? <input type="checkbox"/> SI* <input type="checkbox"/> NO *En caso afirmativo, marque cada casilla que corresponda: <input type="checkbox"/> Agencia Federal _____ <input type="checkbox"/> Agencia Estatal _____ <input type="checkbox"/> Corte Federal _____ <input type="checkbox"/> Agencia Local _____ <input type="checkbox"/> Corte Estatal _____			
16. Por favor proporcione información sobre una persona de contacto en la agencia o corte donde se presentó la denuncia:			
Nombre:			
Dirección:			
Agencia:			
Teléfono:			
Correo Electrónico:			

Usted puede adjuntar cualquier material escrito o cualquier otra información que considere relevante para esta denuncia.

Firma y fecha es requerida para completar este formulario; su firma constituye afirmación que la información aquí contenida es correcta y verdadera.

Firma del denunciante \_\_\_\_\_ Fecha \_\_\_\_\_

Complete y envíe este formulario a:

Gary Madden  
Administrador del Título VI  
United Way 211-VetLink  
9624 Hermosa Avenue  
Rancho Cucamonga, CA 91730

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

United Way 211-VetLink program has not been involved in any transportation-related Title VI investigations, lawsuits or complaints.





United Ways serving  
San Bernardino County



United Way 211-VetLink

## TITLE VI - Public Participation Plan

**Last Updated** March 16, 2018

**Approved by IEUW Board of Directors** June 13, 2018

## **VII. Public Participation Plan**

### ***A. About United Way 211***

United Way 211 is a program of Inland Empire United Way, a 501(c) (3) not-for-profit organization that provides several programs, services, and funding support for other local non-profit organizations who serve children, families, individuals. Inland Empire United Way refers to these non-profit organizations as “community impact partners” who provide vital services in our community. We work in concert with a range of community leaders, social, healthcare, city and county organizations, and service providers whose collaborative engagement is essential to meet the needs of the residents of all of San Bernardino County.

211 San Bernardino County is the central source for providing free and confidential information and referrals for all health and human services in San Bernardino County through our 211sb.org website or our 2-1-1 call line. Our phone lines are open 24 hours a day, 7 days a week, with trained Community Resource Advisors prepared to offer help with any situation, any time, whether financial, domestic, health, or disaster-related. With detailed information on more than 1,300 agencies and the 3,500 programs we operate plus hundreds of state and national resources, we provide information about:

- Supplemental food and nutrition programs
- Shelter and housing options and utilities assistance
- Emergency information and disaster relief
- Employment resources
- Services for veterans
- Health care, vaccination, and health epidemic information
- Addiction prevention and rehabilitation programs
- Reentry help for ex-offenders
- Support groups for individuals with mental illnesses or special needs
- Child and elder abuse
- A safe, confidential path out of physical and/or emotional domestic abuse
- And many other services

211 is committed to be the first, most essential resource to anyone who needs help. Help is available in English, Spanish, and 150 languages.

This Title VI program only applies to the VetLink program of United Way 211. United Way 211-VetLink does not provide transportation services. The VetLink project of United Way 211 is an information and referral service about transportation and community resources for Veterans, their families, and for the local organizations serving them. Initial funding for VetLink was from the Veterans Transportation and Community Living Initiative, a grant initiative from the Federal Transit Administration to “make it easier” for U.S. Veterans, active service members, military families, and others to learn about and arrange for locally available transportation services that connect them with work, education, health care, and other vital services in their communities.

### ***B. Purpose of This Plan***

Public participation plan describes the process through which stakeholders can partake directly in expressing their concerns, desires, and values. It is important to note that outreach activities performed by United Way 211-VetLink are different from outreach performed by United Way 211. United Way 211 performs outreach mainly in English and Spanish. About 87% of calls to United Way 211 are by English speaking callers. About 12% of calls to United Way 211 are by Spanish speaking callers. Less than 1% of calls to United Way 211 are from callers who speak languages other than English or Spanish, those calls are immediately handled through a contracted translation service available to our Community Resource Advisors (CRA) 24/7 every day of the year. United Way 211-VetLink performs outreach only at Veteran related events where either Veterans, or Veteran Service Agencies meet. The official language of business of the United States Armed Forces is English, thus all service members must be proficient in English. Consequently, Veterans are proficient in the English language.

It is the mission of United Way 211 to make sure we connect people to information and resources to ensure they have the tools they need to thrive. At every opportunity through prescribed methods the agency solicits input from stakeholders to best support persons served without creating disproportionately low and adverse effects on information access for minority and/or low-income populations. United Way 211-VetLink notifies the public if there is a need to discontinue the United Way 211-VetLink information services due to lack of federal funding.

## **Outreach Requirements and Activities**

The following activities are intended to serve as guidelines for outreach to ensure that all Veteran callers, their families, and potential callers have equal access and opportunity to participate in information access, transportation discovery and planning, and decision-making. These also provide strategies for soliciting input and engaging various communities.

Any notices will be posted at least one week prior to any public outreach event.

- Any notices are posted at [www.211vetlink.org](http://www.211vetlink.org), and at key community centers with which United Way 211-VetLink has a relationship.
- Comments will be accepted via the United Way 211-VetLink website, at public outreach events, via email, by mail, and by phone to ensure that all populations can participate.

## **Meetings**

United Way 211-VetLink hosts public meetings in facilities that are ADA accessible and during normal business hours to allow for good attendance.

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

- United Way 211-VetLink's printed material are available in English and Spanish. We will continue to monitor the language proficiency composition of the Veteran population and adjust as necessary.
- Event information on United Way 211-VetLink's website is posted in English, with Spanish translation option available.
- United Way 211-VetLink distributes and will continue to distribute event information to community groups and agencies that work with LEP populations.
- United Way 211-VetLink continues cultivating relationships with community agencies that serve LEP populations.

- Public outreach events may include attending already existing community meetings and gatherings, such as resource fairs, faith-based events, and other community activities to invite participation from LEP populations who may not attend United Way 211-VetLink hosted public events.
- United Way 211-VetLink ensures that non-English language interpretations are available at any public meeting or workshop as is appropriate and necessary, and if requested in a timely manner.

Currently, Spanish speaking population is the only population within United Way 211-VetLink's service area that is limited English proficient and that uses United Way 211 with any measurable frequency, as demonstrated in the Language Assistance Plan. United Way 211-VetLink continues to assess the language needs of citizens in its service area through its Language Assistance Plan. At such time, as another group with limited English proficiency reaches significant mass, United Way 211-VetLink continues to review this plan and its strategies to engage with non-English speaking populations.

## **VIII. Summary of Outreach Efforts**

The following is a summary of outreach efforts conducted by United Way 211-VetLink as they relate to Title VI requirements under the Public Participation Plan. Many of our activities are conducted in partnership with other service organizations and non-profit agencies within the community. This is in no way a complete list but rather documents the agency's outreach efforts as they relate specifically to minority and low-income populations.

### ***A. Veterans Outreach***

United Way 211-VetLink has participated in Veterans' community outreach events in conjunction with the major Veteran Service Organizations present in the County whenever it has been possible. Due to the great size of the County of San Bernardino most of these outreach events have meant to reach Veterans in all of the regions of the County of San Bernardino which are: the Central Valley of San Bernardino, the West End of the County, the High Desert, and the Morongo Basin.

### ***B. Presentations to Community Partners***

United Way 211-VetLink has done presentations to staff of a multitude of agencies and organizations who serve Veterans. United Way 211-VetLink also performs informational presentations. These presentations have taken place during the Inland Empire Women Veterans Collaborative, the Inland Empire Quarterly Summit on Veteran Homelessness, Clay Hunt Mental Health Summit, Veterans Awareness Subcommittee and the Inland Empire Collaborative on Veteran Education.

### ***C. SBCTA (San Bernardino County Transportation Authority)***

Public and Specialized Transportation Advisory and Coordination Council meets quarterly and is open to the public. The ***Public and Specialized Transportation Advisory and Coordinating Council*** or PASTACC was created by SBCTA (former SANBAG) during the 1990's in response to AB120, the Social Services Transportation Improvement Act. PASTACC has historically served several purposes. PASTACC serves as an advisory body to SBCTA in matters of transportation as it relates to specialized transportation and serving consumers who are typically represented by social service agencies. Secondly, PASTACC serves to comply with the Transportation Development Act (TDA) Section 99238 requiring the establishment of a social services transportation advisory council specifically to deal with the required annual Unmet Transit Needs Hearings for those areas not using their total LTF allocation on transit (upper and lower desert and the mountain area). Finally, PASTACC provided a mechanism for agencies to come together to develop standardized, countywide approaches to the implementation of the complex Americans with Disabilities Act regulation and to monitor and be apprised of changes in ADA requirements.

### ***D. Customer Satisfaction Surveys (follow-ups)***

United Way211 conducts follow-up surveys with at least 8% of past callers to determine level of satisfaction.

## ***Committees***

United Way 211-VetLink continues to outreach and actively host and participate in relevant meetings to strengthen collaboration and to continue achieving the goals of the initiative which created the project. VetLink's meets and coordinates with representatives of various stakeholder agencies of the Inland Empire, some of them are:

- VAMC Loma Linda Healthcare System
- Riverside County Transportation Commission
- Valley Transportation Services
- Omnitrans
- San Bernardino County Transportation Authority (SBCTA)
- 211 San Bernardino
- 211 Riverside
- IE511
- RCTC
- Riverside Transit Agency
- Victor Valley Transit Agency
- Valley Transportation Services
- Independent Living Partnership
- Mountain Area Regional Transit Authority
- Homeless Veteran Community Planning Group (HVCPG)
- Keys Non-Profit
- LightHouse Community Centers
- U.S. VETS
- Mercy House
- Catholic Charities
- Community Action
- Independent Living Partnership





United Ways serving  
San Bernardino County



United Way 211-VetLink

## TITLE VI – Language Assistance Plan

**Last Updated** March 16, 2018

**Approved by IEUW Board of Directors** June 13, 2018

## IX. Language Assistance Plan, Introduction

This language Assistance Plan was developed during the process of preparing United Way 211-VetLink's Title VI Program to ensure that the service provided by United Way 211-VetLink is accessible to Limited English Proficient (LEP) individuals. Title VI of the 1964 Civil Right Act is one of two federal mandates that guarantee the provision of meaningful access to federally-funded services for LEP individuals:

- Title VI of the 1964 Civil Right Act prohibits federally-funded agencies from discriminating against individuals based on race, color, and national origin and includes meaningful access to LEP customers.
- President's Executive Order 13166, "improving Access to Services for Persons with Limited English Proficiency" (August 11, 2000): Instructs federal agencies to improve access to services by mandating that any federally conducted or assisted programs of activities (e.g. recipients of federal funding) must provide meaningful access to LEP customers.

- Safe Harbor Provision- The Federal Transit Authority Circular 4702. 1B states:

*"DOT has adopted DOJ's Safe Harbor Provision, which outlines circumstances that can provide a "safe harbor" for recipients regarding translation of written materials for LEP population. 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 of 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 requirements 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.*

The United Way 211-VetLink's Title VI Program was prepared in the fall of 2014 and updated in winter of 2018 in accordance with FTA Circular 4702. 1B, Title VI Requirements and Guidelines for Federal Transit Administration Recipients, October 1, 2012.

United Way 211-VetLink's Title VI Program Administrator is:

Gary Madden

Director 211 San Bernardino County

9624 Hermosa Avenue

Rancho Cucamonga, CA 91730

(909) 980-2857

More information about San Bernardino County-VetLink's Title VI Program is available at:  
[www.211Vetlink.org](http://www.211Vetlink.org)

### ***A. Overview of United Way 211-VetLink's Service Area***

United Way 211-VetLink serves the San Bernardino County of California. The cities that comprise San Bernardino County are: Adelanto, Apple Valley, Barstow, Big Bear Chino, Chino Hills, Colton, Crestline, Fontana, Grand Terrace, Hesperia, Highland, Joshua-Tree, Lake Arrowhead, Loma Linda, Lucerne Valley, Montclair, Needles, Ontario, Rancho Cucamonga, Redlands, Rialto, Running Springs, San Bernardino, Twenty-nine Palms, Upland, Victorville, Wrightwood, Yermo, Yucaipa, and Yucca Valley.

United Way 211 San Bernardino County houses the One-Call portion of the VetLink Project, an ambitious and unprecedented project along with 211 Riverside County and several other partners to improve access to transportation for those who served our nation in the U.S. Armed Forces. VetLink's objective is to maximize 211's framework to effectively close the loop between community resources and the Veterans who need them.

## ***B. Language Assistance Goals***

United Way 211-VetLink's goal is to provide meaningful access to LEP customers of United Way 211-VetLink's information and materials by developing a Language Assistance Plan and by periodic evaluation of the developed methods and strategies.

## ***C. Results of the Four Factor Analysis***

### **Factor 1:**

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

United Way 211-VetLink used available census data to determine the geographic boundaries of its service area and identify LEP populations within that area. United Way 211-VetLink utilized the American Community Survey to identify languages other than English spoken by individuals within San Bernardino County. Based on our analysis we found 10+ language groups with populations of LEP individuals greater than the Safe Harbor Provision level of over 5% or 1000 individuals (whichever is less).

The results of the analysis are shown here.

5-Year Estimates Speaks English Less than "Very Well"	San Bernardino County, California		
	Estimate	Margin of Error	Percent of Total Population
<b>Total Population:</b>	1,939,554	*****	100%
Spanish or Spanish Creole	<b>245,345</b>	<b>+/-4,212</b>	<b>12. 65%</b>
Persian	1,079	+/-328	0. 06%
Chinese	14,542	+/-1,236	0. 75%
Japanese	1,123	+/-256	0. 06%
Korean	6,441	+/-888	0. 33%
Mon-Khmer, Cambodian	1,844	+/-557	0. 10%
Thai	1,835	+/-576	0. 09%
Vietnamese	6,365	+/-861	0. 33%
Tagalog	8,387	+/-904	0. 43%
Arabic	4,034	+/-859	0. 21%

Source: U. S. Census Bureau, 2011-2015 American Community Survey

While there are ten LEP groups with populations over the Safe Harbor threshold of 1,000 persons, other than Spanish-speaking LEP's, these groups do not measure even one percent of the service area population and the census data may include a considerable margin of error. Furthermore, while these LEP groups are likely to be encountered to be served by United Way 2-1-1's many programs, they are extremely unlikely to be served by VetLink: VetLink is for the exclusive use of U.S. Veterans and to serve in the U.S. Armed Forces, an individual must speak English well.

**Factor 2:**

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

United Way 211-VetLink started operating since October 2012. United Way 211 has existed and operated in San Bernardino County since 2006. A survey of United Way 211's contracted interpreter services usage reports over the period of October 2012 to October 2017 indicated calls from LEP persons who require interpreter service constitute less than 1% of our total yearly calls. Though there may be some months where no calls requiring interpreter service are received. When we do; these calls are made primarily by Spanish speakers, 3% of our calls come in via the Spanish Line option.

Based on the information from the call log survey, Spanish speaking LEP individuals have accessed United Way 211-VetLink less than 1% of the total calls received the first 5 years of operation. Other LEP individuals have not accessed the United Way 211-VetLink service. No LEP callers have accessed United Way 211-VetLink services other than Spanish. The United Way 211-VetLink Veterans Specialist was able to successfully complete each Spanish speaking call due to being bilingual.

To further validate the data from our call log report, we surveyed United Way 211's call center staff to ask about how many LEP callers they had to assist via a translator. 97% of United Way 211's call center staff (Veterans Specialist included) is bilingual in English and Spanish, which virtually eliminates need for translation services for our Spanish speaking callers. This

demonstrates that LEP populations, other than Spanish-Speaking LEPs, DO NOT frequently access our services.

**Factor 3:**

**The nature and importance of the program, activity, or service provided by the program to people's lives**

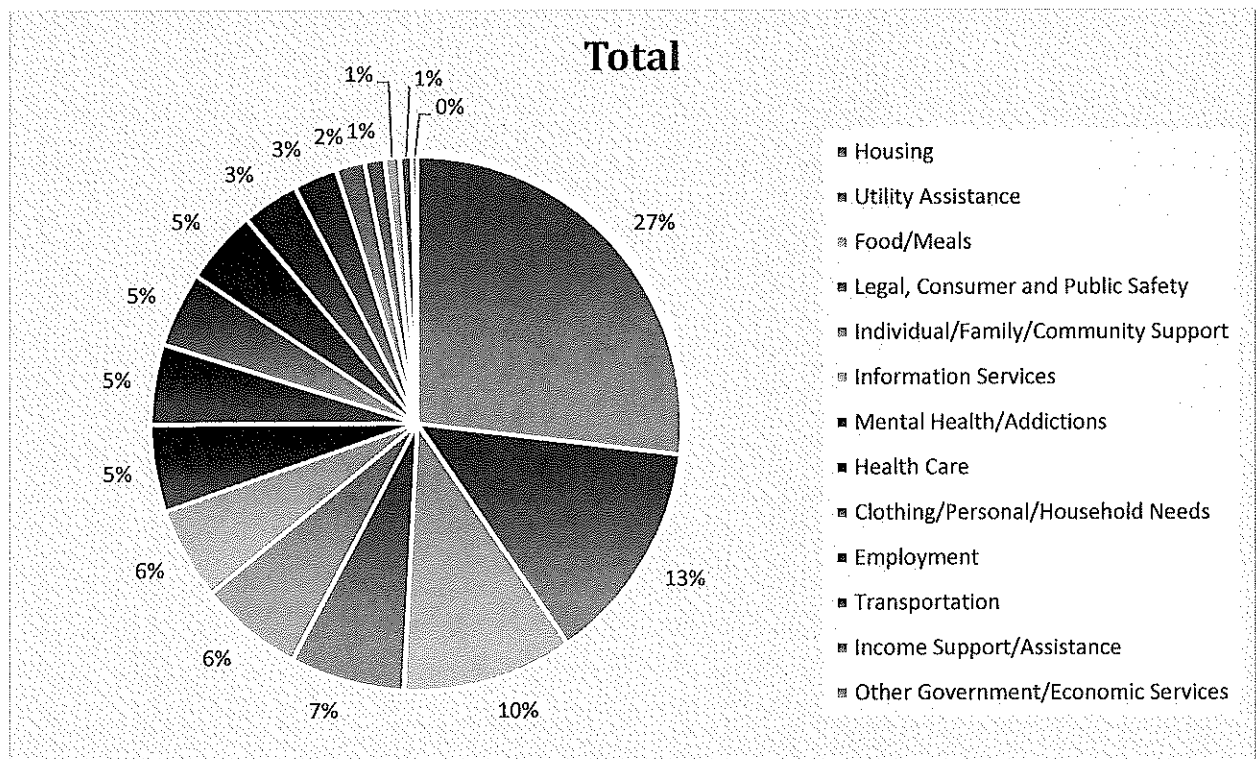
United Way 211-VetLink's transportation information program provides our callers with information access to many vital resources. United Way 211-VetLink began operations on October 2012. This service provides information about community and transportation resources to Veterans, active duty service members, their families, and those who work serving this population. United Way 211-VetLink's program, occasionally assists with 211's Housing Program, Pathways Home the hub for the Coordinated Entry System (CES) in San Bernardino County and conducts outreach and one on one assessments with Veterans that are facing homelessness. 211 VetLink believes that Veterans are most effective at helping Veterans. 211's Certified Veteran Peer Support Specialists are Veterans who have successfully made their own transition back to civilian life; and are helping those who have served our country, along with their families, to connect to the resources they need to survive and thrive.

**Results of LEP Outreach Activity (as it relates to importance of services)**

United Way 211-VetLink is a lifeline service; most callers come to learn about 211 when they are experiencing a life-altering event. Veteran callers to the United Way 211-VetLink are no different than the callers to United Way 211. United Way 211 is a Community Information Center where callers can learn about local community resources. Regardless of the language our callers speak, their needs seem to be the same across the board. When callers reach to United Way 211's services for information, typically they are in a situation they have never been in the past. Most callers have never needed assistance from anyone, and hardship circumstances have placed them in foreign life circumstances. The importance of United Way 211's services is illustrated by our year-end report last published in February 2017. See graph in next page.

## Countywide Caller Needs

No other source of information is as comprehensive as 211 for understanding the needs of low income and vulnerable people in San Bernardino County. The 65,000 – 70,000 calls, texts and emails from community members per year requesting assistance becomes a rich source of local data at the countywide, city, and zip code levels. Although there are only 24 cities and townships in the county, the County website lists 31 cities and towns (<https://www.sbcounty.gov/main/pages/Cities.aspx>). So, for the purposes of continuity, we have chosen to represent 211 data in terms of all 31 areas, whenever possible. Some more granular data analysis descends below the level of statistical significance and is therefore left out for some of the smaller geographical areas.



## United Way 211 2017 Year End Report Highlights

### About

- 12% of callers share income information and more than
- 75% of those fall into low or very low-income levels.
- 45% of caller share the sources of income.
- 12% of those indicate employment as one source of their income.
- 10% indicate employment as the sole source of income.
- 8% indicate no current income with 7% indicating TANF and
- 7% indicating SSI as sole source of income.

Calls continue to be originated by women at a 3 to 1 ratio, consistent over the year life of 211. There has been a steady increase in calls from seniors, with housing becoming more critical. We looked at eight specific needs expressed in the calls to the 2-1-1 number in relationship to the population of 31 cities and towns listed on the San Bernardino County website to see if we could identify higher need areas. Housing needs dominate, at nearly double the requests for the next highest need, utility payment assistance.

The City of Barstow shows the highest rate of calls for help that any other city or town of significant size, followed by the City of San Bernardino. In fact, Barstow, Victorville, Adelanto, Apple Valley, and Hesperia make up five of the top ten cities/towns.

Barstow, Adelanto, Victorville, and Apple Valley show by far the highest need for utility payment assistance. In short, the residents of and around the Victor Valley are desperate for additional economic and other resources, according to their use of the 211 system.

It is no surprise that San Bernardino shows high in all but utilities assistance, and with three cities higher in transportation requests. San Bernardino also generated a much greater volume of calls for help per capita for substance abuse services, 54% higher than the next highest, Yucca Valley. San Bernardino, with the highest concentration of resources, generates the second highest proportional requests for assistance overall.

Redlands shows a surprisingly high need for mental health services, nearly as high as San Bernardino followed by Victorville, Lucerne Valley and Barstow.



**Factor 4:**

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

In United Way 211-VetLink's Public Participation Plan, we laid out the types of outreach activities we undertake. A large portion of outreach is accomplished through cultivating relationships with key contacts who also serve the LEP populations of San Bernardino County such as transportation providers and community resources such as health and human service providers both in the government and nonprofit sectors. United Way 211-VetLink will keep this network of contacts informed of activities, service and events. United Way 211-VetLink's collaborative/partner agencies provide additional ways to get our services information to our LEP populations. Use of this network is a key element in United Way 211's outreach strategy and has little or no associated costs.

We provide the United Way 211-VetLink leaflet in English and Spanish. We utilize bilingual personnel.

- Currently, twenty-seven (27) of our thirty-two (32) employees in 211 are fluent in both English and Spanish
- 24/7 translator service paid for by United Way 211 San Bernardino County
- United Way 211 San Bernardino website [www.211sb.org](http://www.211sb.org)
- Twitter (@211VetLink)
- Facebook (211VetLink)
- Web Widget

***D. Four Factor Analysis Conclusion***

The Four Factor Analysis demonstrates that United Way 211 serves many Spanish speaking transit dependent individuals who do not possess their own mode of transportation. While there are many other LEP groups in San Bernardino County, individually, they do not measure even one percent of the service area population, they do not use United Way 211 services with any frequency, and, finally, are not likely to be eligible for VetLink services as speaking English is a prerequisite for serving in the US Armed Forces. For this reason, United Way 211-VetLink is committed to providing vital documents relating to its services in Spanish as well as English. Vital documents are those that demonstrate how to use services, how to access services and additional information. Last Updated March 2018

While United Way 211-VetLink will currently translate vital documents into Spanish, we will continue to monitor contact with the agency by other LEP individuals and the growth of LEP populations groups in the service area.

United Way 211-VetLink's services being only based on the web and phone service do not produce any vital documents that provide any additional information about its services. All the necessary information about our services is equally accessible through a phone call by dialing 2-1-1 or accessing [www.211vetlink.org](http://www.211vetlink.org) or accessing 211 San Bernardino County's website at [www.211sb.org](http://www.211sb.org).

## **X. Implementation Plan**

### ***1. Monitor and Update the Language Assistance Plan***

#### ***a. Responsibility for Implementing the Language Assistance Plan***

The Title VI Program Administrator will be responsible for overseeing the implementation of this plan and assigning tasks as appropriate.

- 5.1. Assign Day-to-day administration of LEP program, ensuring compliance and correct implementation.
- 5.2. Develop a process for receiving feedback on language assistance measures
  - 5.2.1 Add mandatory question to be asked before ending the call to assess respondents' satisfaction with language assistance
- 5.3. Internal monitoring of language assistance measures
  - 5.3.1 Survey/interview United Way 211-VetLink staff about interaction with LEP individuals and their ability to interact successfully
- 5.4. Make changes to the language assistance plan based on feedback received

United Way 211-VetLink's Title VI Program Administrator is:

Gary Madden

Director of 211 San Bernardino County

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Rancho Cucamonga, CA 91730

(909) 980-2857

Email – [gmadden@ieuw.org](mailto:gmadden@ieuw.org)

Information about United Way 211-VetLink's Title VI Program available at:

[www.211vetlink.org](http://www.211vetlink.org)

#### ***b. Language Service Provision***

### **Interpretation Services**

- 1. VetLink San Bernardino's host agency, United Way 211 contracts services of Tele-Interpreters to provide simultaneous interpretation for callers with whom staff can't communicate due to language barrier.

2. When a caller discloses that they do not speak either English or Spanish, the Community Resource Advisor (CRA) can immediately offer an in-call translation service in order to complete the Information and Referral service.
3. Simultaneous interpretation at public events will be determined on a case-by-case basis by examining several factors, such as:
  - the type and size of event; and
  - the availability of a Community Senior Service staff member to interpret; or
  - the availability of a staff member of a host organization to interpret, etc.

For small outreach events and proactive outreach, bilingual staff members will assist with translation where appropriate and feasible. For large outreach events, where it is appropriate and necessary to do so, United Way 211-VetLink will hire an interpreter through a local or regional service.

### ***c. Translation of Vital Documents***

1. Based on the results of the four-factor analysis, the following vital documents are translated into Spanish (the one predominant LEP language within 211 San Bernardino-VetLink's service area):
  - 1.1 United Way 211-VetLink's brochure/leaflet
  - 1.2 Title VI Notice to the Public
  - 1.3 Title VI Complaint Form
  - 1.4 Title VI Complaint Procedures

### ***d. United Way 211-VetLink's Website***

1. The United Way 211-VetLink's website [www.211vetlink.org](http://www.211vetlink.org) is currently set at English as default language. The website's visitor has the current ability to translate the contents of the website into Spanish via a conspicuous translator hyperlink at the bottom of the page.

***e. Outreach***

1. To ensure that LEP individuals are aware of United Way 211-VetLink's language assistance measures United Way 211-VetLink:
  - Clearly state that interpretation services are available to the caller upon request
  - Information on the website is translatable to Spanish
2. Bi-lingual posters are posted at the following locations:
  - United Way 211-VetLink's call center
  - Community centers and/or popular destinations identified during the Four Factor Analysis and ongoing outreach
3. United Way 211-VetLink staff continues developing relationships with organizations that serve LEP individuals and developing strategies to spread awareness of United Way 211-VetLink's language assistance services.

***2. Monitoring, Evaluating, and Updating the LAP***

1. A thorough review of this Language Assistance Plan will be undertaken every three years concurrent with updating and submitting the United Way 211-VetLink's Title VI Program. At that time, the LEP population will be reassessed, to ensure all significant LEP languages are included in United Way 211-VetLink's language assistance efforts.
2. United Way 211-VetLink regularly assess the effectiveness of how it communicates with LEP individuals by:
  - Including questions about language assistance and information needs on follow-up surveys

3. United Way 211-VetLink will track its language assistance efforts, including:

- Reporting Veterans Community Resource Advisor interactions with LEP
- Translation service reports/invoices

### ***3. Staff Training***

United Way 211's Training Manual provides proper procedures for all pertinent staff to handle LEP calls. This training includes the following:

- How to respond to LEP callers
- How to respond to LEPs in person
- How to document LEP needs
- How to respond to civil rights complaints

The United Way 211 Call Center Manager develops a schedule for periodic refresher training after initial, new-hire training.

## **XI. Membership of Non-Elected Committees and Councils**

United Way 211-VetLink does not have any non-elected Committees or councils. While their initially was a Steering Committee composed of members of public and community-based transportation programs, Veterans services organizations and the VA, this group has not continued to meet, since it was created for the development and initial phase of this project.

## **XII. Equity Analysis**

United Way 211 San Bernardino-VetLink does not have transit related facilities as we do not provide transportation. United Way 211-VetLink manages and provides information. Therefore, the requirements to conduct a Title VI Equity Analysis does not apply to our agency.

## **Board of Directors Approval**

### **Action Item No. 1**

#### **AN ACTION ITEM OF THE INLAND EMPIRE UNITED WAY BOARD OF DIRECTORS AUTHORIZING THE TITLE VI COMPLIANCE PLAN FOR UNITED WAY 211's VETLINK.**

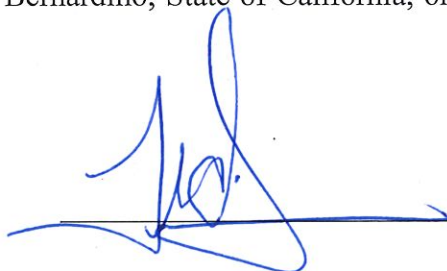
WHEREAS, Inland Empire United Way desires to comply with Title VI of the Civil Rights Act of 1964, including new provisions detailed in U. S. Department of Transportation's FTA Circular 4702. 1B, "Title VI Requirement and Guidelines for Federal Transit Administration Recipients,"

WHEREAS, the Board of Directors wishes to authorize approval of the compliance plan developed by staff to comply with necessary provisions of the Civil Rights Act,

NOW, THEREFORE BE IT RESOLVED, by the Board of Directors of Inland Empire United Way follows:

1. The Chief Executive Officer is authorized to implement the components of the plan to meet Federal requirements.
2. The Chief Executive Officer is authorized to implement policies that may be necessary to comply with subsequent revisions or interpretations to the Civil Rights Act.

PASSED AND ADOPTED by the Board of Directors of Inland Empire United Way and its program United Way 211-VetLink San Bernardino, State of California, on this 13<sup>th</sup> day of June 2018.



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**Chair of the Board**