

Service First of Northern California, INC.

TITLE VI PROGRAM

Revised: July 7, 2026

Approved by Service First of Northern, California Inc.

Board of Directors:

102 W. Bianchi Road,

Stockton, CA 95207

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www.servicefirstnc.org

Introduction

This document was prepared by Service First of Northern California, Inc. to comply with Title VI of the Civil Rights Act of 1964, including new provisions detailed in the U.S Department of Transportation's FTA Circular 4702.1B, "Title VI Requirements and Guidelines for Federal Transit Administration Recipients".

Table of Contents

Title VI Notice to the public	Pg. 3
List of Locations Where Title VI is Posted	Pg. 4
Title VI Complaint Procedures	Pg. 5
Title VI Complaint Form	Pg. 8
List of Transit-Related Title VI Investigations, Complaints, and Lawsuits	Pg. 11
Public Participation Plan	Pg. 12
Language Assistance Plan	Pg. 15
Table Depicting the Membership of Non-Elected Committees And Councils	Pg. 23
Title VI Equity Analysis	Pg. 23
Board of Directors Approval of Title VI Program	Pg. 24

Service First of Northern California Inc.

Title VI Notice to the Public

Notifying the Public of Rights under Title VI

Service First of Northern, California Inc.

- Service First of Northern California Inc. Operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act.
- Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with Service First of Northern, California Inc.
- For more Information on Service First of Northern, California Inc. civil rights program, and the procedures to file a complaint, contact (209) 644-6300, or visit our administrative office at 102 W. Bianchi Road, Stockton, CA 95207. For more information, visit www.servicefirstnc.org.
- A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Pacific Region: U.S. Department of Health and Human Services 90 7th street, suite 4-100 San Francisco, CA 94103. Customer Response Center: (800) 368-1019 Fax: (202) 619-3818 TDD: (800) 537-7697 Email: OCRMAIL@HHS.gov
- If Information is needed in another language, contact (209) 644-6300.

Notificar al publico de los derechos bajo el titulo VI

Service First of Northern, California Inc.

- Service First of Northern California Inc. opera sus programas y servicios sin distinción de raza, color u origen nacional, de conformidad con el Título VI de la Ley de Derechos Civiles.
- • Cualquier persona que crea que ha sido agraviada por cualquier práctica discriminatoria ilegal según el Título VI puede presentar una queja ante Service First of Northern California Inc.
- • Para obtener más información sobre el programa de derechos civiles de Service First of Northern California Inc. y los procedimientos para presentar una queja, comuníquese al (209) 644-6300 o visite nuestra oficina administrativa en 102 W. Bianchi Road, Stockton, CA 95207. Para más información, visite www.servicefirstnc.org.
- • Un denunciante puede presentar una queja directamente ante la Administración Federal de Tránsito presentando una queja en la Oficina de Derechos Civiles, Atención U.S. Department of Health and Human Services 90 7th street, suite 4-100 San Francisco, CA 94103. Customer Response Center: (800) 368-1019 Fax: (202) 619-3818 TDD: (800) 537-7697 Email: OCRMAIL@HHS.gov
- • Si se necesita información en otro idioma, comuníquese al (209) 644-6300.

List of Locations Where Title VI Is Posted

Service First of Northern, California Inc. notice to the public is currently posted at the following locations in both English and Spanish of the Title VI: Notice, Complaint Procedures and Complaint Procedures and Complaint Form:

Location Name	Address	City
Service First Administrative Offices	102 W Bianchi Road	Stockton
Treatment Services	3422 West Hammer Lane	Stockton
Treatment Services	1011 N. Center Street	Stockton
5310 Vehicles Storage	4825 Kentfield Road	Stockton
Rep Payee Services	7 West Acacia Street	Stockton
Modesto Office	1124 11 th Street Suite A	Modesto

The Title VI notice and program information is also provided on Service First of Northern, California Inc. website at www.servicefirstnc.org . Title VI: Notice, Complaint Procedures and Complaint Form: will also be laminated and posted in all 5310 vehicles in English and Spanish.

Title VI Complaint Procedures

As a recipient of federal dollars, Service First of Northern, California Inc. is required to comply with Title VI of the Civil Rights Act of 1964 and ensure that services and benefits are provided on a non-discriminatory basis. Service First of Northern, California Inc 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 Federal Transit Administration Circular 4702.1B, dated October 1, 2012.

Any person who believes she or her has been discriminated against on the basis of race, color, or national origin by Service First of Northern, California Inc. may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form. Service First of Northern, California Inc. investigates complaints received no more than 180 days after the alleged incident. Service First of Northern, California Inc. will only process complaints that are complete.

Within 10 business days of receiving the complaint, Service First of Northern California Inc. 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. Service First of Northern, California Inc. 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, Service First of Northern, California Inc. may contact the complainant. The complainant has 10 business days from the date of the letter to send request information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within 10 business days Service First of Northern, California Inc. can administratively close the case.

A case can 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 the two letters to the complainant: A closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. An LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member or other action will occur. If the complainant wishes to appeal the decision, she/he has 10 business days after the date of the letter or the LOF to do so.

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

Service First of Northern, California Inc.

Title VI Complaint Form

COMPLAINT FORM

Section 1: Please write legibly		
1. Name:		
2. Address:		
3. Telephone:		3.a. Secondary Phone (optional):
4. Email Address:		
5. Accessible Format Requirements?	☐ Large print	☐ Audio Tape
	☐ TDD	☐ Other
Section 11:		
6. Are you filing this complaint on your own Behalf?	YES*	NO
*If you answered "yes" to #6, go to Section 111.		
7. If you answered "no" to #6, what is the name of the person for whom you are filing this complaint Name:		
8. What is your relationship with this individual?		
9. Please explain why you have filed for a third party:		
10. Please confirm that you have obtained permission of the aggrieved party to file on their behalf.	Yes	No
Section 111:		
11. I believe the discrimination I experienced was based on (check all that apply) ☐ Race ☐ Color ☐ National Origin		
12. Date of alleged discrimination: (mm/dd/yyyy)		
13. Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include 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.		

Service First of Northern California Inc.

Title VI Complaint Form, Page 2

COMPLAINT FORM

Section IV:		
14. Have you previously filed a Title VI complaint with Service First of Northern, California?	YES	NO
Section V:		
15. Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?		
☐ 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:
Section VI:		
Name of Transit Agency complaint is against:		
Contact Person:		
Telephone:		

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

Signature and date are required below to complete form:

Signature _____ Date _____

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

Service First of Northern California, Inc., Title VI Coordinator

102 W. Bianchi Road, Stockton, CA 95207

Titulo VI Procedimiento de Queja

Como un receptor de dólares federales, Service First of Northern California Inc. Tiene que cumplir con lo dispuesto en el Titulo VI de la ley de los derechos civiles de 1964 y asegúrese de que los servicios y los beneficio se proporcionen sobre una base no discriminatoria. Service First of Northern California Inc ha puesto en marcha un procedimiento de queja Titulo VI, que emboza un proceso de disposición local de quejas del Titulo VI y es consistente con las pautas de Administración Federal de Transito Circular 4702.1B, de Octubre 1, 2012.

Cualquier persona que cree que ha sido objeto de discriminación por motivos de raza, color, u origen nacional por Service First of Northern California Inc. Puede presentar al Titulo VI su denuncia. Service First of Northern California Inc. Investiga las quejas no mas de 180 dias despues del incidente. Service first of Northern California Inc... Solo tramitara las quejas que están completas.

En un periodo de 10 dias de haber recibido la demanda, Service First of Northern California Inc. La revisara para determinar si nuestra oficina tiene la jurisdicción. El autor de la queja, recibirá un acuse de recibo informándole al denunciante que será notificado por escrito si el caso de el/ella el será investigado por nuestra oficina. Service First of Northern California Inc. Tiene 30 dias para investigar la queja.

Si necesita mas informacion para resolver el caso, Service First of Northern California Inc. Puede contactar al autor de la queja. El autor de la queja tiene 10 dias de la fecha que recibió la carta para solicitar un investigador que sea asignado al caso.

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

FORMA DE QUEJA

Seccion 1: Escribir en forma legible		
1. Nombre:		
2. Direccion:		
3. Telefono:	3.a. Telefono secundario (opcional):	
4. Direccion de correo electronico:		
5. Reuistos de forma accessible?	☐ Impresion Grande	☐ Cinta de audio
	☐ TDD	☐ Otros
Section 11:		
6. Esta presentando esta queja en su propio nombre	SI	NO
*Si usted contesto "si" to #6, vaya a la Seccion III.		
7. Si usted contesto "no" Cuál es el nombre de la persona para quien está presentando esta denuncia? Name:		
8. Cual es su relacion con este individuo:		
9. Por favor, explique por que han presentado para una tercer parte:		
10. Por Favor, confirme que ha obtenido el permiso de la parte agraviada en el archivo en su nombre.	Si	No
Section 111:		
11. Creo que la discriminacion que he experimentado fue basado en (marqu todas las que corresponden): ☐ Raza ☐ Color ☐ Origin nacional		
12. Fecha de supuesta discriminacion: (mm/dd/aaaa)		
13. Explica lo mas claramente posible lo que ocurrió y por que usted cree que son objeto discriminación. Describir todas Las personas que han participado. Incluir el nombre y la información de contacto de la(s) persona(s) que descrimina contra usted (si se conoce), así como los nombres y la información de contacto de los testigos. Si se necesita mas espacio, por favor adjunte hojas adicionales de papel.		

Section IV:		
14. Anteriormente ha presentado un Titulo VI denuncia con la Service First of Northern California Inc	SI	NO
Section V:		
15. Ha presentado esta queja con cualquier otro local, estado o federal, o con cualquier Federal o Estado?		
[] SI* [] NO		
Marque todo lo que aplica :		
[] Agencia Federal _____	[] Agencia Estatal _____	
[] Federal Tribunal _____	[] Agencia Local _____	
[] Tribunal Estatal _____		
16. Si usted contesto "si" a la posición #15, proporcionan información acerca de una persona de contacto en la agencia/tribunal donde se presento la denuncia		
Nombre:		
Título:		
Organismo:		
Dirección:		
Teléfono:		Correo electrónico:
Section VI:		
Nombre de organismo Transito denuncia es contra:		
Persona de contacto:		
Teléfono:		

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

Service First of Northern California, Inc. has not been involved in any transportation related Title VI investigations, lawsuits or complaints.

Service First of Northern California, Inc.

Lists of Investigation, lawsuits and complaints.

Type of Process	Date	Summary (Including Basis of complaint	Status	Action(s) Taken
Investigations				
1. None				
Lawsuits				
1. None				
Complaints				
1. None				

Service First of Northern California, Inc.

Public Participation Plan

Service First of Northern California, Inc. is a non-profit 501 c (3) mental health and social services organization that provides treatment, housing, job assistance, case management and other social services for the homeless, SSI recipients, disabled adults and veterans. This agency is licensed by the State of California Department of Social Services, Community Care Licensing Division and further certified by California Department of Mental Health. Services for the program are funded by the San Joaquin County Department of Mental Health with referrals from same agency, Department of Social Services, and the Valley Mountain Regional Center.

Service First serves the general public and also a limited population of adults with developmental disabilities with a mission of achieving the highest level of independence and stabilization. Service First partners with other such agencies in the community to increase access to services needed and foster a continuum of care for the developmentally disabled.

Service Firsts clients have physical and mental disabilities, mental health disorders such as schizophrenia, bipolar disorder, major depression, Post Traumatic Stress Disorder as well as often with a co-occurring disorder of substance use and abuse. Some clients also have physical manifestations of their illness which carries over to health conditions such as diabetes, obesity, high blood pressure and other traumas to their body. These clients continue to be at risk for relapse which hinders their ability to navigate public transportation. Clients generally require a high level of supervision and have limited ability to navigate transportation in the community. About 98% of Service First clients are eligible for and receive SSI and Medi-Cal benefits, determined largely by disability and limited resources and income.

The program provides limited transportation to and from the programs and conducts weekly community integration trips. Trips include various health care appointments, shopping for groceries, community recreation, job search and educational opportunities. Given the relatively small size of the program and our limited exposure, the scope and provision of transportation service do not have significant impact on the general public and minority and low-income populations in the geographic area. Service First is focused on clients referred to, and referred from mental health and social services programs. While small scale, Service First does maintain systems to gather

stakeholder input regarding agency services and conducts public relations and outreach activities in order to create meaningful opportunities for public engagement as outlined below.

Purposes of this Plan

Public participation is the process through which stakeholders can partake directly in agency decision-making, and express their concerns, desires, and values. It is the mission of this Service First to "improve the lives of people with disabilities by creating opportunities to maximize their independence." At every opportunity through prescribed methods Service First will solicit input from stakeholders in order to best support persons served without creating disproportionately high and adverse human health or environmental effects on minority and/or low-income populations.

Summary of Outreach Efforts

The following is a summary of outreach efforts conducted by Service First as related to Title VI requirements under the Public Participation Plan. Many of our activities are conducted in partnership or ad hoc outreach with other service organizations and non-profit agencies within the community.

This is not meant to be an exhaustive list but rather highlights a few of the agency's outreach efforts as they relate specifically to minority and low-income populations.

Valley Mountain Regional Center (VMRC) Transition Fair

Service First participates annually in the Valley Mountain Regional Center (VMRC) Transition Fair by hosting an informational booth. The fair provides an opportunity to connect with transition – age youth, individuals with disabilities, families, and community partners.

As our booth, we share information about the full range of services offered by Service First, including:

- Employment Services
- Transportation Services
- State – Licensed Day Program
- Gaming and Social Engagement Program
- Food Services Transportation and Wellness Program

Food Services Transportation Program

Our Food services Transportation Program assists low-income individuals and people with disabilities who lack reliable transportation. The program provides transportation to local farmers markets and grocery stores, helping participants access fresh food and essential household necessities while promoting independence and community inclusion.

Continuum of Care Participation

Service First actively participates in the San Joaquin County Continuum of Care meetings on a monthly basis. These meetings provide an opportunity to inform community partners about the services we offer and collaborate with organizations serving vulnerable populations. Regular participation helps us stay informed about emerging needs, strengthens partnerships, and ensures our programs remain responsive to the individuals and families we serve.

Senior Awareness Day

As a booth participant Service First uses this event to make seniors aware of the available services through this agency. Our Ticket to work jobs program as well as the aquatic therapy wellness program has frequently participated in this event. This event is publicized through flyers and emails to facility staff who work with clients meeting the criteria who can benefit from these items.

Recovery Happens

Service First has been an annual booth participant at Recovery Happens. It is a national observance that educates Americans on the fact that addiction treatment and mental health services can support those with as substance use and/or mental disorder to live a healthy and rewarding life. This is an annual event hosted by the San Joaquin County Behavioral Health Services. Not only does Service First utilize the event for client awareness it is also makes the agency more visible to other agencies as well as San Joaquin County Department that refer clients with developmental disabilities.

“Options” Learning Center

"Options" is Service First's adult day center for developmental disabled adults. Weekly the clients take bus trips to various places around the City: movies, museums, parks, ball games and restaurants. The clients are moving billboards of the transportation service provided by the agency. Their trips give them a chance to integrate with the community and to explore parts of the City not usually available to them.

Representative Payee Program

The program serves developmental disabled, the homeless and veterans. Most of the clients are on Supplemental Security Income and the payee service is charged with paying their bills for a fee. Client in the program benefit from staff that is fluent in Spanish, Vietnamese and Tagalog.

Valley Mountain Regional Services

Valley Mountain is a grant funded agency that serves children and adults with developmental disabilities. Clients are referred to Service First from Valley Mountain to the "Options" Learning Center, the Supported Living Services and our housing program. Management meet with regularly Valley Mountain staff to insure that Service First is meeting their Agency's need in regarding to meeting the agency's need for a standard of care.

Service First of Northern California, Inc. Website

Currently, Service First of Northern California, Inc. posts notices and announcements on the agency's website. Additional public input can be obtained by the Title VI: Notice, Complaint Procedures and Complaint Form, which is available as a download in English and Spanish.

The agency is also is in the planning stages of creating a Public Relations Committee. The Committee will meet quarterly and conduct various comprehensive outreach activities throughout the year including public engagements, newsletter's, open houses and press releases. Additionally, as part of this committee we will develop a comprehensive Strategic Marketing Plan that includes Public Relations, Employee and Consumer Relations, and an annual In-Service training.

Language Assistance Plan

Overview

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

Factor 1:

The number or proportion of LEP persons in the service area who may be served or are likely to encounter the Life Skills Learning Center program, activity or service.

Factor 2:

The frequency with which LEP persons come in contact with the Life Skills Learning Center program, activity or service.

Factor 3:

The nature and importance of programs, activities or services provided by life Skills Learning Center to the LEP population.

Factor 4:

The resources available to Service First of Northern California, Inc. and overall cost to provide LEP assistance.

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

Purpose of the Language Assistance Plan

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

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

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

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

Four Factor Analyses

Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by Service First of Northern California, Inc.

Service First of Northern California, Inc. holds a unique position in regard to meeting the Title VI requirements. As a sub-recipient of FTA 5310 Grant funding, the agency's focus is primarily to transport adults with disabilities where current public transit options are insufficient or do not exist. Eligible program participants or "riders" must be referred into the program by Valley Mountain Regional Services. As such, Service First of Northern California, Inc. offers transportation to the general public other than in situations involving a coordinated plan with other entities or a medical transport. Therefore, an analysis of public demographic data in San Joaquin County does not represent actual populations served by this program but is offered for comparison purposes only.

U.S. Census Bureau

The U.S. Census Bureau 2020-2024 American Community Survey (ACS) Language Spoken at Home by the ability to Speak English estimates that of the 823,815 San Joaquin County residents, 354,240, or 43%, speak language other than English at home and 112,122, or 14.4% speak English less than “very well”. All other non-English language resulted in less than 1% of the population.

San Joaquin County, California	Estimate	Percentage
Total:	823,815	100%
Speak only English	469,575	57%
Other non English Language	354,240	43%
Speak English less than “very well”.	118,629	14.4%

Valley Mountain Regional Center Expenditures

The Valley Mountain Regional Center purchase of Service and Demographic Data Report for Fiscal year 2012/2013 identifies total annual expenditures for services by nprimary language spoken but does not ascertain whether English is also spoken “very well” or less then “very well. As indicated in Valley Mountain analysis above, Spanish has shown consistently to be the primary language for our LEP populations. Other languages make up less than 5% of the LEP population. The report further breaks down by age group for ages 22 and older. Service First would be included in this category as a provider of service that are purchased by Valley Mountain Regional Center.

The report indicates that authorized services for age 22 and older in FY 2012-2013 totaled \$160,245,079. Of that total, \$136,543,657 (85.2%) was spent on English speaking consumers and \$19,744,258 (12.3%) was spent on Spanish speaking consumers. Expenditures for other languages totaled less than 3%.

Authorized Services by Language	Amount	Percent
Total Authorized Services Purchased	\$160,245,079	100%
English	\$136,534,657	85.2%
Spanish	\$19,744,258	12.3%

By comparison, the Service First received from Valley Mountain in FY 2012-2013 amounts to approximately .26% of the total Valley Mountain RC authorized services purchased. Theoretically, if this percentage were applied to the service purchased for Spanish speaking consumers (19,744,258) it would equate to the revenue necessary to

provide service to only 2 Service First consumers. If it is assumed that these four consumers speak Spanish as a primary language; it remains unclear how many would speak English less than "very well".

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

As indicated above, historically, contact with LEP consumers is very infrequent in this program. However, a survey of the agency's phone reception staff indicated calls from LEP persons are received 3-4 times per month. The staff indicated that these calls are primarily received from clients inquiring about services. Currently, there is one client who speaks Spanish and does not speak English very well. Two other clients with disabilities have difficulty speaking as well.

In a similar survey in the Service First of Northern California, Inc. program, reception staff revealed that they seldom receive phone calls from LEP persons and have encountered only a few consumers who were LEP in the history of the program.

The Aquatic Therapy and Wellness programs serve 80-100 clients per week. Out of that group, there are usually 5-8 who are Spanish speaking only or very limited English speaking who attend on a weekly basis. Spanish speaking staff provides their initial intake and after the forms are completed and the baseline stats are measured a translator is not needed until more forms and stats are needed.

Annual consumer and care provider surveys provide an opportunity for input and suggested services. Surveys have not contained requests for translation services. Translation services are provided by a translation agency on an as needed basis.

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

The primary purpose of the Service First of Northern California, Inc. program is to provide training opportunities that foster personal growth for individuals with disabilities. Transportation during Community Integration training is offered weekly as a part of the service in addition to limited transportation to/from the program. Annual consumer surveys indicate that transportation for Community Integration activities is an important part of the services offered for consumers.

Currently, Service First of Northern California, Inc. "Options" Learning Center serves 45-50 clients at different intervals on monthly basis. The length of time an individual is

Typically enrolled in the program can range from a few months to many years. Clients are not required to "graduate" and may remain in the program as long as their needs can continue to be met.

The Aquatic Therapy and Wellness program clients are referred to by physicians. Clients will be treated as long as they are in pain or graduate to a different therapy program. It is the only warm water therapy pool within a 50-mile radius.

While the number of clients treated by Service First of Northern California, inc. programs are relatively small in proportion to the San Joaquin County's population they are "essential" programs. They create opportunities that can enhance the quality of life for adults with disabilities or who are living in pain.

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

The Service First of Northern California, Inc. operating budget does not have a specific line item for providing language access and outreach. Outreach expenses as they relate to LEP populations are split among several departments depending on which department is responsible for the outreach. Costs for translation of documents are minimal and has not been quantified. The majority of the larger expenses are allocated to the Aquatic Therapy. Service First other programs are contract programs where clients are referred by Valley Mountain Regional Services or San Joaquin County Mental Health.

The budget for Service First of Northern California, Inc, which provides services through the FT A 5310 grant, is a small portion of the agency's budget. The total annual expenditure for "Options" Learning Center and Aquatic Therapy and Wellness Center outreach activities are less than \$1000. They include clients' holiday productions, brochures and occasional newsletters. Specific outreach to LEP populations has not been conducted, thereby showing that a reasonably significant number of LEP people have not been served by this program, a Factor 1s indicated in factor 1.

SUMMARY

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

- **It is likely that Valley Mountain provided funding for only 2 consumers that spoke Spanish as a primary language in the 2012-2013 fiscal year. English proficiency of those four is unknown.**
- **Service First serves roughly 3-5 LEP clients weekly on an annual basis through the "Options" Learning Center and 5-8 clients weekly on an annual basis through the Aquatic Therapy Program.**
- **Language proficiency is primarily affected by both disability and limited English.**
- **No consumers were underserved or excited by the program due to language barriers.**
- **Surveyed Agency staff reported 3-4 LEP phone calls per week.**
- **Surveyed staff reported seldom receiving LEP phone calls.**
- **Provision of transit is not considered an "essential" service but is a component of the Service First of Northern California, Inc. program.**
- **Service First of Northern California, Inc. does not have an LEP specific budget line.**
- **Service First of Northern California, Inc., spends less than \$1000 per year on all outreach efforts.**
- **Daily revenue rate for program services is based on a contracted rate and adjusted on an annual basis.**

Language Assistance Implementation Plan Methodologies

Identifying LEP Individuals

As evidenced by the Four Factor Analysis, very few "true" LEP individuals are referred to the Service First of Northern California, Inc. program. The predominant minority language in the region is Spanish. The consumers that are primarily served by Service First of Northern California, Inc. program have both disabilities that affect language proficiency and limited English clients with a language barrier.

While there is a substantial minority population in the region, according to the Valley Mountain Purchase of Service and Demographic Data Report, the funds allocated to the Hispanic language population are minimal. Over the past few years, the agency served 3-5 clients per week with disabilities affecting their ability to speak and 5-8 with language barriers. The agency does, however, have systems in place to provide access to minority populations.

Providing Services

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

- Title VI Notice to the Public
- Title VI Complaint Form
- Title VI Complaint Procedures
- Consumer Program Handbook including ABLE Grievance Policy
- Agency website Title VI information

Other documents can be translated to Spanish orally as appropriate. Due to the low literacy rate of consumers in the Service First of Northern California, Inc. program, most documents are translated orally.

Communicating Availability of Language Assistance

Individuals who are referred to Service First of Northern California, Inc. programs for services are assigned based on the level of their disability and their ability to communicate, Staff can offer Spanish translation services as needed. Staff can also offer translation services to guests and consumers' family members when needed.

As the new agency website is further developed the goal is to also contain summary information in Spanish with instructions on how to obtain more information.

Monitoring

Management and staff Service First of Northern California, Inc. are constantly looking for ways to minimize barriers that are created by architectural factors, environmental factors, attitudinal factors, financial and employment barriers and communication barriers such as language. This is ongoing activity.

Employee Training

Another ongoing activity is the monthly one-on-one meetings between the Service First of Northern California, Inc. the staff, the management teams and the President. It is at these meetings that issues are discussed that include Customer Service and Language Assistance training.

The agency also encourages staff to live up to it motto of "serious about service". Great customer service is what has made the agency successful. Management is constantly training staff in various ways to improve service, through education, through in-house training, through hiring staff from different backgrounds and language skills. Staff is always given the first chance at promotions. Service First has many employees with over 10 years of service and most have been promoted to a management position.

Safe Harbor Provision

The Federal Transit Authority Circular 4702.1B states:

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

These safe harbor provisions apply to the translation of written documents only. They do not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable. A recipient May determine, based on the Four Factor Analysis, that even though a language group meets the threshold specified by the Safe Harbor Provision, written translation may not be effective means to provide language assistance measures. For example, a Recipients may determine that a large number of people 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 VT Program."

As previously stated, Service First of Northern California, Inc. program serves individuals with moderate to severe developmental disabilities who require a high level of supervision. As such, the majority of consumers have very limited literacy skills and are unable to read or write. Program documents are generally interpreted orally by Case Service Counselors.

Membership of Non-Elected Committees and Councils

Service First of Northern California, Inc. does not have a non-elected transit-related advisory council at this time.

Title VI Equity Analysis

Service First of Northern California, Inc., does not have transit-related facilities.

Board of Directors Approval of Service First of Northern California, Inc. Title VI Program

A RESOLUTION OF THE SERVICE FIRST OF NORTHERN CALIFORNIA, INC. BOARD OF DIRECTORS AUTHORIZING THE TITLE Compliance PLAN FOR THE AGENCY.

WHEREAS Service First of Northern California, Inc. 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 4702.1 B, "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 Service First of Northern California, Inc. as follows:

- 1. The President/CEO authorized to implement the components of the plan in order to meet Federal requirements.**

- 2. The President/CEO is authorized to implement policies that may be necessary to comply with subsequent revisions or interpretations to the Civil Rights Act.**

PASSED AND ADOPTED by the Board of Directors of Service First of Northern California, Inc., State of California, on this 28th day of April 2026.

Greg Brazile

President of the Board