

TITLE VI PROGRAM



8608 Live Oak Avenue

Fontana, CA 92335

909-428-3833

FX: 909-428-3835

www.industrial-support.org

www.facebook.com/IndustrialSupportSystems

FRW/ISS Transit Coordinator

Program Manager

lporter@industrial-support.org

Quality Assurance Manager

jvarela@industrial-support.org

**FRW/ISS Board Resolution
November 18, 2015**

**RESOLUTION
BOARD OF DIRECTORS
Fontana Resources At Work**

WHEREAS, Fontana Resources At Work dba Industrial Support Systems (FRW/ISS) as a recipient of Federal Transit Administration (FTA) revenues and is required to meet federal regulatory requirements through the Title VI as required by FTA Circular 4702.1A and in compliance with Department of Transportations' Title VI regulations 49 C.F.R. part 21.7; and

WHEREAS, the FTA requested that FRW/ISS provide a Title VI Complaint Procedures and Limited English Proficiency Plan that ensures that no person or group of persons on the basis of race, color, or national origin is subjected to discrimination in the level and quality of transportation services and benefits and that steps are taken to ensure that persons with limited English proficiency are provided these rights; and

WHEREAS, FRW/ISS developed an updated Title VI Complaint and Limited English Proficiency Plan based on best practices that meet FTA Guidelines.

NOW, THEREFORE, BE IT RESOLVED that the transit Coordinator or designee shall be able to file the Title VI Complaint Procedures and Limited English Proficiency Plan.

PASSED, APPROVED AND ADOPTED this 18th day of November 2014.

Jim Coulson, Secretary/Treasurer,
Board of Directors

TITLE VI NOTICE TO THE PUBLIC

Fontana Resources at Work d.b.a. Industrial Support Systems (FRW/ISS) is committed to ensuring that no person is excluded from participation in, or denied the benefits of its services on the basis of race, color or national origin as provided by Title VI of the Civil Rights Act of 1964, including new provisions detailed in U.S. Department of Transportation FTA circular 4702.1B "Title VI Requirements and guidelines for Federal Transit Administration Recipients."

FRW/ISS operates its programs and services without regard to race, color and national origin, in full compliance with Title VI, as amended. It is our objective to:

- Promote full and fair participation of all affected populations in transportation decision making;
- Prevent denial, reduction, or delay in benefits related to programs and activities that benefit minority populations or low-income populations;
- Ensure access to programs and activities by persons with limited English proficiency.

FRW/ISS is committed to a policy of non-discrimination in the conduct of its business, including its Title VI responsibilities and to the delivery of equitable and accessible transportation services. Any person who believes she/he has been aggrieved by an unlawful discriminatory practice under Title VI may file a complaint with FRW/ISS. All complaints will be fairly and objectively investigated.

- To file a complaint, you may contact FRW/ISS at 909-428-3833 x 120, or visit our administrative office at 8608 Live Oak Avenue, Fontana, CA 92335. You may also submit your complaint directly to our Transit Coordinator at jvarela@industrial-support.org
- FRW/ISS phone system currently includes a Spanish option (reached by dialing 6 when prompted to do so) on the recorded greeting. A bilingual receptionist is available to answer phone inquiries for Spanish speaking customers during business hours (Monday – Friday 7:30 am -4:15 pm). After business hours inquiries can be left on the bilingual voice mail and are responded to promptly the next business day.
- For more information about the Title VI program and complaint procedure at FRW/ISS, contact 909-428-3833; or visit FRW/ISS' website: www.industrial-support.org
- A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Title VI Program Coordinator, FTA Office of Civil Rights, East Building 5th Floor-TCR, 1200 New Jersey Ave., S.E., Washington, D.C. 20590.
- Si necesita información en española llame al 909-428-3833.
- Kung ang impormasyon ay kinakailangan sa ibang wika, makipag-ugnay sa 909-428-3833.*

Título VI aviso al público

Fontana Resources at Work d.b.a. Industrial Support Systems (FRW/ISS) se compromete a garantizar que ninguna persona está excluida de la participación en, o negada los beneficios de sus servicios sobre la base de raza, color u origen nacional lo dispuesto por el título VI de la ley de derechos civiles de 1964, incluyendo nuevas disposiciones detalladas en TLC del Departamento de Transporte de Estados Unidos 4702.1B circular "Título VI requisitos y directrices para los receptores de administración de tránsito Federal."

FRW/ISS opera sus programas y servicios sin distinción de raza, color y origen nacional, en plena conformidad con el Título VI, en su forma enmendada. Nuestro objetivo es:

- Promover la participación plena y justa de todas las poblaciones afectadas en la toma de decisiones de transporte;
- Evitar la denegación, reducción o retraso en beneficios relacionados a los programas y actividades que benefician a las poblaciones minoritarias o poblaciones de bajos ingresos;
- Garantizar el acceso a los programas y las actividades de las personas con dominio limitado del inglés.

FRW/ISS está comprometida con una política de no discriminación en la conducta de su negocio, incluyendo sus responsabilidades título VI y a la prestación de servicios de transporte accesible y equitativa. Cualquier persona que cree que él/ella ha sido agraviada por una práctica discriminatoria ilegal bajo el título VI puede presentar una queja con FRW/ISS. Todas las quejas serán justa y objetivamente investigadas.

- Para presentar una queja, puede contactar con FRW/ISS en 909-428-3833 x 260, o visite nuestra oficina administrativa en 8608 Live Oak Avenue, Fontana, CA 92335. Usted también puede presentar su queja directamente a nuestro coordinador de tránsito en jvarela@industrial-support.org
- FRW/ISS sistema telefónico actualmente incluye una opción española (alcanzada marcando 6 cuando se le pida hacerlo) en el saludo grabado. Una recepcionista bilingüe está disponible para responder consultas teléfono para clientes de habla españolas durante el horario comercial (el lunes al viernes 7:30 a.m. -4:15 p.m.). Después de horas hábiles consultas pueden dejarse en el correo de voz bilingüe y se responden rápidamente al siguiente día hábil.
- Para obtener más información sobre el procedimiento de quejas o programa Título VI en PFR/ISS, póngase en contacto con 909-428-3833; o visite el sitio web de FRW/ISS: www.industrial-support.org
- El demandante puede presentar una queja directamente ante la Administración Federal de tránsito por archivar una queja con el Coordinador del programa Título VI, FTA oficina de derechos civiles, East Building 5th Floor-TCR, 1200 New Jersey Ave., S.E., Washington, D.C. 20590.

- Si necesita información en española, llame al 909-428-3833.
- If information is needed in another language, contact 909-428-3833.
- Kung ang impormasyon ay kinakailangan sa ibang wika, makipag-ugnay sa 909-428-3833.

List of Locations where Title VI Notice is Posted

Location Name	Address	City
FRW/ISS Admin office	8608 Live Oak Ave.	Fontana
Website	www.industrial-support.org	
Posted in vehicles	To file a TITLE VI complaint or make comment regarding our services jvarela@industrial-support.org www.industrial-support.org 909-428-3833 x 260	

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

TITLE VI COMPLAINT PROCEDURES

FRW/ISS, as a recipient of federal dollars, is required to comply with Title VI Civil Rights Act of 1964 and ensure that services, programs, and benefits are provided on a non-discriminatory basis. This complaint procedure outlines the process for local disposition of the Title VI complaints and is consistent with guidelines in the Federal Transit Administration Circular 4702.1B, dated 1, 2012. Complaint Procedures and Complaint Form are published on our website www.industrial-support.org or you may request a form by emailing your contact information to our Transit Coordinator at isshotline@industrial-support.org.

FRW/ISS does not deny the complainant the right to file a formal complaint(s) with any other federal, state, or local agencies or seek private counsel for complaints alleging discrimination, intimidation, or retaliation of any kind that is prohibited by law.

TITLE VI QUESTIONS AND ANSWERS

What is Title VI?

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.

How do I file a Title VI Complaint?

If you believe you have been discriminated against, you may file a signed, written complaint within one hundred and eighty (180) days of the date of alleged discrimination. The complaint should include the following:

- Your name, address, and how to contact you (i.e., telephone number, email address, etc.)
- How, when, where, and why you believe you were discriminated against. Include the location, names, and contact information of any witnesses.

The complaint may be filed in writing to:

- Industrial Support Systems
Quality Assurance Manager
8608 Live Oak Avenue
Fontana, CA 92335

Printable form: Online at www.industrial-support.org

Email: jvarela@industrial-support.org

Phone: 909-428-3835 x 120

FAX to: 909-428-3835

Complaint Assistance: FRW/ISS will assist with writing a complaint if the complainant is unable to do so. Si necesita información en español, llame al (909) 428-3833

Complaints may also be filed directly with the Federal Transit Administration as follows:

- Title VI Program coordinator

FTA Office of civil Rights, East Building, 5th Floor-TCR
1200 New Jersey Avenue, S.E.
Washington, D.C. 2059

Who can I file a complaint?

FRW/ISS does not deny the complainant the right to file a formal complaint(s) with any other federal, state, or local agencies or seek private counsel for complaints alleging discrimination, intimidation, or retaliation of any kind that is prohibited by law.

What happens to my complaint?

All complaints alleging discrimination based on race, color or national origin (in compliance with Title VI Civil Rights Act of 1964) in a service or program operated by FRW/ISS will be investigated to full resolution in no more than one hundred eighty (180) days after the alleged incident, by our Transit Coordinator (the person in the position of Program Manager or his/her designee). FRW/ISS will process only complaints that are complete.

Within ten (10) business day of receiving the complaint, the Transit Coordinator will review it to determine if FRW/ISS has jurisdiction. The complainant will receive an acknowledgment letter informing the complainant whether the complaint will be investigated by FRW/ISS. FRW/ISS has thirty (30) days to investigate the complaint. The complainant will be notified in writing of the cause to any planned extension the 30-day rule.

If more information is needed to resolve the case, FRW/ISS may contact the complainant. The complainant has 10 business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within 10 business day FRW/ISS can administratively close the case. A case can also be administratively close if the complainant no longer wishes to pursue their case.

How will I be notified of the outcome?

After the investigator reviews the complaint, he/she will issue of one 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, he/she has thirty (30) days after the date of the closure letter or the LOF to appeal to the FRW/ISS Board of Directors or their 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).

FRW/ISS TITLE VI COMPLAINT FORM

(please print)

Section I.		
1. Name		
2. Address		
3. Telephone	(1)	(2optional)
4. Email		
5. Accessibility Requirement	<input type="checkbox"/> Large Print	<input type="checkbox"/> Audio Tape
	<input type="checkbox"/> TDD	<input type="checkbox"/> Other (explain)
Section II:		
6. Are you filing this complaint on your own behalf?	Yes ()*	No ()
If you answered "yes" go to Section III, If you answered no, complete Section II		
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 III:		
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: ____/____/____		
13. Explain as clearly as possible what 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.		

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FRW/ISS Title VI Complaint Form, Page 2

Section IV:

14. Have you previously filed a Title VI complaint with FRW/ISS?	() Yes	() No
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Section V:

15. Have filed this complaint with any other Federal, State, or local agency, or with an Federal or State Court?

() Yes* () No

If yes, check and identify all that apply (if "No" go to Section VI):

() 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 to the address below:

**Quality Assurance Manager
Industrial Support Systems
8608 Live Oak Avenue
Fontana, CA 92335**

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

FRW/ISS has not been involved in any transportation related Title I Investigations, lawsuits or complaints.

List of Investigations, Lawsuits and Complaints

Type of Process	Date	Summary (including basis of complaint)	Action(s) Taken
Investigations			
1. None			
2.			
Lawsuits			
1. None			
2.			
Complaint			
1. None			
2.			

Public Participation Plan

OUR MISSION

Fontana Resources At Work doing business as Industrial Support Systems, is committed to maintaining a stable environment wherein people with disabilities are provided with those services and supports that enable them to overcome barriers to employment and empower them to maximize their employment potential.

OUR VALUES

Quality

Exceeding Customer
Expectations

Advocacy

Breaking Down Barriers

Self-Worth

Be Proud of Yourself

Teamwork

One Mission, One Goal

Stewardship

Managing Resources through Personal
Commitment

Choice

Options for Growth

Empowerment

Freedom to Excel

OUR VISION

Fontana Resources At Work doing business as Industrial Support Systems, is committed to be a leader in the Inland Empire in providing high quality products and services in support of employment opportunities for people with disabilities.

About FRW/ISS

Fontana Resources at Work was founded in 1964 to meet the needs of individuals with developmental disabilities. Primarily the at Work was established to provide continued program and activities for the growing number of individuals with cognitive/intellectual disabilities graduating from Slover Special School in Fontana, and special education classes through the Fontana Unified School District. The Parent Teachers Association (PTA) for the Slover Special School, Virginia Primrose, principal; and Nathan Simon, a local businessman, were the leaders behind the development of the workshop.

In 1965, the workshop separated from the school district. Locating space in the “old post office building” on Wheeler Avenue, Fontana, the facility received a grant from the Dept. of Mental Health. A director was hired, and a staff of volunteer workers assisted adults with disabilities in the first activities of making pot scrubbers out of nylon net, wrapping dates in aluminum foil, packaging hobby stamps, and other simple assembly-type jobs.

In 1974, FRW filed a fictitious business statement and the name, Industrial Support Systems became the company’s dba (doing business as). Fontana Resources at Work continues to remain a California Corporation and is a non-profit, tax exempt organization under the IRS Code 501 (c) 3.

With the expansion of services and population, the organization had outgrown the facility on Wheeler Avenue and some of its programs had to be relocated to other sites in the San Bernardino and Rialto areas.

The dream of someday having all programs under one roof became a reality in 1993. With the assistance of a Community Block Grant from the County of San Bernardino, the site on Almeria Avenue was purchased. On September 29, 2014 we moved our facility into our current location 8608 Live Oak Avenue, Fontana.

Purpose of this Plan

Public participation is the process through which stakeholders can partake directly in agency decision making, and express concerns, desires, and values. It is the goal of this organization to make sure we are connecting people, information, resources and communities to enrich the lives of people with disabilities. FRW/ISS will solicit information 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. FRW/ISS will engage the public if there is a change in Nova Transportation services should there be a

significant reduction in funding and/or an elimination of funding, or should there be a significant increase in services provided.

Outreach Requirements and Activities

The following activities are intended to serve as guidelines for outreach to ensure that all riders and potential riders have equal access and opportunity to participate in transportation planning and decision-making. These also provide strategies for soliciting input and engaging stakeholders.

Public meetings: Any notices will be posted at least two weeks prior to the public event.

- Notices will be posted at FRW/ISS offices, on website and social media sites.
- Information about public participation opportunities will also be posted on FRW/ISS website at least two (2) weeks prior to the event.
- Comments will be accepted at public outreach events via email, by mail, and by phone to ensure that all populations have the opportunity to participate.

If a public meeting is held, FRW/ISS will host the meeting in facilities that are ADA accessible and at a time that will allow the majority of participants to have the opportunity to attend.

Outreach Methods to engage Minority and Limited English Proficient (LEP) Population

- As deemed necessary FRW/ISS will develop/provide postings in Spanish and any other identified language.
- Event information on FRW/ISS's website and social media sites will be posted in English and Spanish and any other language deemed necessary.
- Interpretation or translation at any public meetings will be provided as necessary.

Spanish is the only quantifiable population identified in FRW/ISS service and surrounding area as limited English proficiency. FRW/ISS will continue assessing 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, FRW/ISS will review this plan and its strategies to engage non-English speaking populations.

- FRW/ISS will continue to cultivate relationships with regional center and other stakeholders that serve LEP populations

- Public outreach events may include notification to regional centers and other stakeholders in order to invite participation from LEP populations who may not attend FRWISS hosted public events.
- If deemed necessary and/or appropriate, FRW/ISS will ensure that non-English language interpretation will be available at any public meeting.

Summary of Outreach Efforts Made Over the Last Three Years

The following is a summary of outreach efforts conducted by FRW/ISS 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 organizations within our and surrounding communities.

- **Fairs and Other Special Events** – FRW/ISS staff and management participates in local events and holds fund-raising events focused on individuals with intellectual/cognitive disabilities.
- **Service Clubs and Chambers**- FRW/ISS management and Board of Directors participate in service oriented organizations within the community addressing social concerns, especially those of limited means. Through Chambers it is able to stay abreast of business needs and concerns within our community.
- **Annual Reports** – FRW/ISS conducts annual satisfaction surveys with its stakeholders. It also completes and Annual Performance Improvement Assessment, Risk Management Assessment and Accessibility Plan Assessment to determine stakeholder satisfaction and organizational improvement to meet the needs of persons served within our programs and to meet the needs of our community.
- **PASTACC:** It is the intention of FW/ISS to participate in the PASTACC (Public and Specialized Transportation Advisory and Coordination Council) a SANBAG (San Bernardino Associated Governments) sponsored advisory body established under the California Transportation Development Act §99238. In San Bernardino County, PASTACC brings together public transit operators and social service transportation providers to discuss the mobility issues and challenges that confront seniors, persons with disabilities or persons of limited means.

FRW/ISS will maintain a Transportation committee that will meet no less than quarterly. (This committee will consist of Transit Coordinator, Office (HR) Manager, Marketing Development Specialist, Consumer Council member and one Board of Director member).

Language Assistance Plan

Introduction

This Language Assistance Plan was developed during the process of preparing FRW/ISS's Title VI Program to ensure that FRW/ISS programs are accessible to Limited English Proficient (LEP) individuals. Title VI of the 1964 Civil Rights 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 Rights Act prohibits federally-funded agencies from discriminating against individuals based on of race, color or national origin and includes meaningful access to LEP customers.
- President's Executive Order 13166 (August 11, 2000) *"Improving Access to Services for Persons with Limited English Proficiency"*. The Executive Order requires Federal agencies to examine the services they provide, identify any need for services to those with limited English proficiency (LEP), and develop and implement a system to provide those services so LEP persons can have meaningful access to them.
- *Safe Harbor Provision. DOT has adopted DOJ's Safe Harbor Provision, which outlines circumstances that can provide a "safe harbor" for recipients regarding translation of written materials for LEP populations. The Safe Harbor Provision stipulates that, if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with the recipient's written translation obligations. Translation of non-vital documents, if needed, can be provided orally. If there are fewer than 50 persons in a language group that reaches the five percent (5%) trigger, the recipient is not required to translate vital written materials but should provide written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost. These safe harbor provisions apply to the translation of written documents only. They do not affect the requirement to provide meaningful access to LEP individuals through*

competent oral interpreters where oral language services are needed and are reasonable. A recipient may determine, based on the Four Factor Analysis, that even though a language group meets the threshold specified by the Safe Harbor 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.

FRW/ISS' Title VI program was prepared in November of 2014 in accordance with FTA Circular 47022.1b, TVI requirements and guidelines for federal Transit Administration Recipients October 1, 2012.

FRW/ISS' Title VI Program Administrator is:

Program Manager

Fontana Resources At Work dba Industrial Support Systems

8608 Live Oak Avenue

Fontana, CA 92335

[Email - lporter@industrial-support.org](mailto:lporter@industrial-support.org)

More information about FRW/ISS' Title VI Program is available at: www.industrial-support.org

FRW/ISS service area is mainly the City of and unincorporated areas of Fontana. A small number of consumers are referred from parts of Eastern San Bernardino County. In general cities may include Rialto, Bloomington, Colton, San Bernardino and Highland.

FRW operates Nova Transportation, a program that offers curb-to-curb transportation services to and from work for individuals with intellectual/cognitive and other disabilities who are also served by FRW/ISS programming.

Language Assistance Goals

FRW/ISS' goal is to provide meaningful access to LEP customers of FRW/ISS' programs, information and materials by developing a Language Assistance Plan and by regular evaluation of the developed methods and strategies.

Four Factor Analysis

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

FRW/ISS used available census data to determine the geographic boundaries of its service area and identify LEP populations within the area. FRW/ISS utilized the website www.usa.com to identify languages spoken by individuals within its service area.

Based on our analysis we found 3 language groups with populations greater than the Safe Harbor Provision level of over 5% or 1000 individuals (whichever is less).

Language Spoken at Home

	Fontana, CA		% California	U.S.
English	18,935	39.84%, see rank	58.28%	79.64%
Spanish	24,136	50.78%, see rank	24.75%	11.57%
Other Indo-European Languages	892	1.88%, see rank	5.78%	4.61%
Asian and Pacific Islander Languages	2,829	5.95%, see rank	10.14%	3.24%
Other	734	1.54%, see rank	1.05%	0.94%

*Based on 2008-2012 data. <http://www.usa.com/fontana-ca-population-and-races.htm#LanguageSpoken>

(FRW/ISS has chosen to identify Filipino [Tagalog] as the Asian language as Filipino populations and in-home language is used 3 to 1 times more frequently than other Asian languages.)

The next highest levels of language groups after Spanish and Tagalog are Chinese and Vietnamese. However, percentages fall below the Safe Harbor Provision and FRW/ISS will monitor proportions and will translate as needed among these groups.

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

A survey of FRW/ISS' phone reception staff indicates calls from LEP persons are received at least 1 times per week. These calls are more times than not Spanish speakers. Based on the information from the staff survey, Spanish speaking individuals are accessing FRW/ISS' programs daily. Other LEP individuals are accessing FRW/ISS' programs far less if at all. FRW/ISS will begin outreach using Tagalog or other Asian languages as needed or requested.

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

FRW's Nova Transportation provides ridership with access to work. For the ridership this is a vital resource. Results of FRW.ISS's program will be reflected in surveys completed

annually by riders and addressing the satisfaction of their ridership. FRW/ISS serves transit dependent individuals for whom its services are the primary transportation resource. For this reason FRW/ISS is committed to translating vital documents related to its services as needed or requested. Vital documents are those that demonstrate how to access services and information about FRW/ISS's Title VI program.

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

Outreach activities are addressed earlier in this document. A large portion of outreach will be accomplished through cultivating relationships with key contacts at referral sources. FRW/ISS will keep this network of contacts informed of activities, services and events. Use of this network is a key element in our outreach strategy and will have little or no associated costs.

The only significant group requiring language assistance at this time is the Hispanic/Latino population; however, we will continue to seek to identify other groups needing language assistance and will monitor the need of LP persons in order to design its communication and public transportation efforts to include people regardless of language barriers.

FRW/ISS resource materials can be translated into Spanish as needed or requested. FRW/ISS has bilingual personnel in positions. They include:

- Spanish
 - Receptionist (1)
 - Production Supervisors (2)

Responsibility for implementing the Language Assistance Plan

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

Implementation Plan on Language Assistance

Identifying LEP Persons who Need Language Assistance:

As previously noted, the only significant group requiring language assistance at this time is the Hispanic/Latino population; however, FRW/ISS will continue to seek to identify other groups needing language assistance and will monitor the need of LEP persons in order to design its communication and public participation efforts to include people regardless of language barriers.

Providing Language Assistance:

FRW/ISS will use a variety of techniques/practices to provide meaningful opportunities for LEP persons to access information and provide input that may impact key decisions. These techniques may include:

- Use of Google Translator to make the website accessible in all languages supported by Google Translator
- Availability of bilingual staff to aid LEP persons whether in person, on the phone and/or in written correspondence
- Maintaining awareness and sensitivity to LEP persons needs in the continuing development of the FRW/ISS Accessibility Plan
- Simultaneous interpretation at public events will be determined on a case-by-case basis by examining several factors, such as:
 - Type size of event;
 - 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, FRW/ISS may consider hiring an interpreter through a local or regional source.

Timeline: Translation of Vital Documents:

- Based on the results of the four factor analysis, the following vital documents will be translated into Spanish. Translation into Tagalog will be done as necessary and/or

requested.

- Going forward, the extent of FRW/ISS' ability and obligation to translate written documents will be determined on a case-by-case basis, by looking at all elements resented in the Four Factor Analysis.
- Vital Documents are defined as:
 - Title VI Notice to the Public
 - Complaint Form
 - Complaint Procedures
 - Appropriate FRW/ISS Information regarding FRW Nova Transportation

FRW/ISS' Website

- All translated vital documents will be posted on FRW/ISS' website on their respective pages.
- FRW/ISS will pursue the most appropriate and feasible option for translating information on its website. Elements included in the Four Factor Analysis will be used in recommending a best course.

Outreach

- FRW/ISS management staff will continue developing relationships with organizations that serve LEP individuals
- Language assistance information will be posted at administrative offices and on website.

Monitoring, Evaluating, and Updating the LAP

- A thorough review of this Language Assistance Plan will be undertaken every three (3) years concurrent with updating and submitting the Title VI Program. Reassessment of the LEP population will occur at this time in order to ensure all significant LEP languages are included. The following reoccurring reporting and evaluation measures will be used to update the LAP:
 - FRW/ISS will regularly assess the effectiveness of communications with LEP individuals by:
 - Including questions about language assistance and information needs on any stakeholder surveys
 - Conversations with key contacts of referral and funder sites that work with LEP's
 - FRW/ISS will track its language assistance efforts, including:
 - Reporting front-line staff's interactions with LEP

Staff Training

FRW/ISS' Title VI Transit Coordinator will develop, with staff Training Specialist, guidelines for training staff to be conducted through calendar year until all pertinent staff has been trained. Training will be given to all new staff during their first 6 month introductory period. Training will reoccur annually with schedule to be made available to all staff. This training will include:

- How to respond to LEP callers
- How to respond to correspondence from LEP's
- How to respond to LEP's in person
- How to document LEP needs
- How to respond to civil rights complaints

Membership of Non-Elected Committees and Councils

The Steering Committee for this report is made up of the Management Team of FRW/ISS. The ethnic breakdown includes: 3 Caucasian origin (33.3%); 3 African/American (33.3%); 3 from Hispanic origin (33.3%).

Title VI Equity Analysis

FRW/ISS does not have transit related facilities. Therefore the requirements to conduct a Title VI Equity Analysis did not apply.

