



Institute for the Redesign of Learning
Almansor/Westmoreland

TITLE VI PROGRAM

March 2023

**Institute for the Redesign of Learning
Board of Directors:**

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www.redesignlearning.org

INTRODUCTION

This document was prepared by The Institute for the Redesign of Learning 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."

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The Institute for the Redesign of Learning's Title VI Notice to the Public

Notifying the Public of Rights under Title VI Institute for the Redesign of Learning

- Institute for the Redesign of Learning 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 the Institute for the Redesign of Learning.
- For more information on the Institute for the Redesign of Learning's civil rights program, and the procedures to file a complaint, contact 323-341-5580, or visit our administrative office at 99 Pasadena Ave. Suite 10C; South Pasadena, CA; 91030.

For more information, visit www.redesignlearning.org.

- A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590
- If information is needed in another language, contact 323-341-5580.

Notificar al público de los derechos bajo el título VI Instituto para el Redeseno de Aprendizaje

- Intituto para el Rediseno de Aprendizaje opera sus programas y servicios sin respecto a raza, color y origen nacional con arreglo al título VI de la Civil Ley de derechos. Cualquier persona que cree que él o ella ha sido agraviado por cualquier práctica discriminatoria ilegal bajo el título VI puede presentar una queja con Instituto para el Rediseno de Aprendizaje.
- Para obtener más información sobre el programa derechos civiles capaz de industrias y el procedimientos para presentar una queja, llame al (323) 341-5580, o visite nuestra oficina administrativa en 99 Pasadena Ave. Suite 10C South Pasadena, CA 91030. Para más información información, visite www.redesignlearning.org.
- Un demandante puede presentar una queja directamente con el Federal Transit Administration por archivar una queja con la Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590
 - Si se necesita información en otro idioma, contacte al 323-341-5580

List of Locations Where Title VI Notice Is Posted

Institute for the Redesign of Learning notice to the public is currently posted at the following locations:

Location Name	Address	City
Administrative Office	1317 Huntington Dr.	South Pasadena
Almanson Transition & Adult Services	211 Pasadena Ave.	South Pasadena
Almanson Academy & Almanson Early Childhood Education Services	1955 Fremont Ave.	South Pasadena
Westmoreland Academy	5 & 6 Westmoreland Place	Pasadena
5310 Vehicles	1955 Fremont Ave.	South Pasadena

The Title VI notice and program information is also provided on the Institute for the Redesign of Learning's website at www.redesignlearning.org

Title VI Complaint Procedures

As a recipient of federal dollars, the Institute for the Redesign of Learning 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. The Institute for the Redesign of Learning 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.

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

Within 10 business days of receiving the complaint, The Institute for the Redesign of Learning 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. The Institute for the Redesign of Learning 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, the Institute for the Redesign of Learning may contact the complainant. The complainant has 10 business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within 10 business days the Institute for the Redesign of Learning 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 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.

Institute for the Redesign of Learning Title VI Complaint Form

COMPLAINT FORM

Section I: Please write legibly		
1. Name:		
2. Address:		
3. Telephone:	3.a. Secondary Phone (<i>Optional</i>):	
4. Email Address:		
5. Accessible Format Requirements?	☐ Large Print	☐ Audio Tape
	☐ TDD	☐ Other
Section II:		
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
Section III:		
11. I believe the discrimination I experienced was based on (<i>check all that apply</i>):		
☐ Race	☐ Color	☐ 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.		

Institute for the Redesign of Learning Title VI Complaint Form, Page 2

COMPLAINT FORM

Section IV:		
14. Have you previously filed a Title VI complaint with the Institute for the Redesign of Learning?	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:
Institute for the Redesign of Learning, Title VI Coordinator
625 Fair Oaks Ave., Suite 300
South Pasadena, CA 91030

Título VI Procedimientos de Reclamación

Como un receptor de dólares federales, el Instituto para el Rediseño de Aprendizaje es necesario para cumplir con el Título VI de la ley de derechos civiles de 1964 y asegurar que los servicios y beneficios son proporcionados en una base no discriminatoria. El Instituto para el Rediseño de Aprendizaje tiene en lugar un procedimiento de queja de título VI, que describe un proceso para disposición local de las quejas del título VI y es consistente con las directrices encontramos la C Administración Circular Federal de Tránsito 4702.1B, de fecha 01 de octubre del 2012.

Cualquier persona que cree que él o ella ha sido discriminado en base a raza, color u origen nacional por el Instituto para el Rediseño de Aprendizaje puede presentar una queja de título VI llenando y enviando el formulario de denuncia de la Agencia título VI. El Instituto para el Rediseño de Aprendizaje investiga denuncias recibidas a más tardar 180 días después del supuesto incidente. El Instituto para el Rediseño de Aprendizaje será sólo las quejas de proceso completos

Dentro de los 10 días siguientes a la recepción de la demanda, el Instituto para el Rediseño del aprendizaje lo revisará para determinar si nuestra oficina tiene jurisdicción. El autor recibirá un acuse de recibo que él/ella si la denuncia será investigada por nuestra oficina. El Instituto para la reformulación del Aprendizaje tiene 30 días para investigar la denuncia. El demandante será notificado por escrito de la causa de cualquier prórroga prevista en la norma de los 30 días.

Si se necesita más información para resolver el caso, el Instituto para el rediseño de Aprendizaje pueden ponerse en contacto con el demandante. El demandante tiene 10 días hábiles, contado a partir de la fecha de la carta para enviar información solicitada por el investigador asignado al caso. Si el investigador no es contactado por el demandante, o no recibe la información adicional dentro de los 10 días hábiles siguientes el Instituto para el rediseño de Aprendizaje pueden administrativamente cerrar el caso.

Un caso puede ser cerrado administrativamente también si el demandante ya no desea seguir su caso. Después de que el investigador comentarios sobre la queja, él/ella emitirá uno de dos cartas al demandante: una carta de cierre (closure letter) o una carta de encontrar (letter of finding; LOF). Una carta de cierre (closure letter) resume las acusaciones y afirma que no hubo una violación del título VI y que el caso será cerrado. Una (letter of finding) LOF resume las denuncias y las entrevistas sobre el presunto incidente y explica si cualquier acción disciplinaria, entrenamiento adicional de la funcionaria u otra acción ocurrirá. Si el demandante desea apelar la decisión, él/ella tiene 10 días hábiles después de la fecha de la carta o el (letter of finding) LOF para hacerlo.

Una persona también puede presentar una queja directamente ante la Administración Federal de tránsito, en FTA oficina de derechos civiles, 1200 New Jersey Avenue SE, Washington, DC 20590.

Instituto de la Modernización de Aprendizaje Título VI forma de queja

Secciom I: <i>Por favor, escribir de manera legible</i>		
1. Nombre:		
2. Direccion		
3. Telefono:	3.a. # de Telefono Secundario <i>(Opcional)</i>	
4. Coreo Electronico:		
5. Requisitos de formato accesible	☐ Letra Grande	☐ Cinta de Audio
	☐ DTS	☐ Otro
Seccion II:		
6. La presentación de la denuncia en su propio nombre?	SI	NO
*Sin contest "si" a la #6, vaya a al Seccion III.		
7. Si contest "no" a la #6, Cuál es el nombre de la persona a quien está presentando esta queja? Nombre:		
8. Cual es su relacion con este individuo?		
9. Por favor, explique por qué se a presentado para una tercera parte:		
10. Por favor, confirme que ha obtenido el permiso de la parte agraviada en el archivo en su nombre	SI	NO
Seccion III:		
11. Creo que la discriminación que he experimentado fue basado en (marque todas las que correspondan):		
☐ Raza	☐ Color	☐ Origen Nacional
12. Fecha de la supuesta discriminación. (mm/dd/yyyy)		
13. Fecha de la supuesta. Explicar lo más claramente posible lo que ocurrió y por qué usted cree que son objeto de discriminación. Describir todas las personas que han participado. Incluir el nombre y la información de contacto de la(s) persona(s) que discriminan a usted (si se conoce), así como los nombres y la información de contacto de los testigos. Si se necesita más espacio, por favor adjunte hojas adicionales de papel discriminación: .		

Instituto para el Rediseño del Aprendizaje Título VI Formulario de Queja, Página 2

FORMULARIO DE RECLAMACIÓN

Seccion IV:		
14. Anteriormente ha presentado un Título VI denuncia con el Instituto para el nuevo diseño del aprendizaje?	SI	NO
Seccion V:		
15. Ha presentado esta queja con cualquier otro local, estatal o federal, o con cualquier tribunal Federal o Estatal? ☐ SI* ☐ NO Si la respuesta es sí, marque todo lo que aplique: ☐ Agencia Federal _____ ☐ State Agency _____ ☐ Tribunal Federal _____ ☐ Agencia Legal _____ ☐ Tribunal de Justicia del Estado _____		
16. Si usted contestó "sí" a la posición #15, proporcionan información acerca de una persona de contacto en la agencia/tribunal donde se presentó la denuncia .		
Nombre:		
Titulo:		
Agencia:		
Direccion:		
Telefono:		Correo Electronico:
Section VI:		
Nombre agencia de Tránsito denuncia es contra:		
Persona de contacto:		
Telefono:		

Usted puede adjuntar cualquier material escrito u otra información que considere relevante para su reclamación.

Firma y fecha son necesarios para completar la forma siguiente:

Firma: _____ Fecha: _____

Por favor, envíe este formulario en persona o por correo este formulario a la siguiente dirección:

Instituto para la Reformulación de la Enseñanza, Título VI Coordinador

625 Fair Oaks Ave., Suite 300
South Pasadena, CA 91030

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

The Institute for the Redesign of Learning has not been involved in any transportation-related Title VI investigations, lawsuits or complaints.

Public Participation Plan

About The Institute for the Redesign of Learning

As a leader in special education, The Institute for the Redesign of Learning, a 501(c)3 nonprofit organization, has been meeting the unique needs of students with cognitive, learning, and emotional disabilities since 1974. The Institute annually serves 3,700 children and adults from 37 communities in Los Angeles and the San Gabriel Valley, all of whom have developmental, emotional, learning or language difficulties, or multiple diagnoses, including individuals with Autism. We currently operate an Early Education Program, a Special Education non-public Day School (the Almansor Academy), and Transition and Adult Services all in South Pasadena. The Institute's Autism Spectrum Disorders Special Education non-public Day School (the Westmoreland Academy) is located in Pasadena, CA. Additionally, our Mental Health Department offers Mental Health Services on 50 public school campuses, as well as in community settings and at two clinical sites. Our Community Outreach Program provides early-intervention services at over 270 Head Start Classrooms throughout Los Angeles County. Our mission is to empower at-risk individuals to take charge of their own learning and become competent, caring, and contributing members of society; and to provide training opportunities for families and professionals to support those efforts.

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 agency to "improve the lives of people with disabilities by creating opportunities to maximize their independence." At every opportunity through prescribed methods the agency 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 Institute for the Redesign of Learning takes great care in collaborating with the School Districts and Regional Centers with which it is contracted. Due to pre-existing relationships and not being a public transportation organization, communication with the School Districts, Regional Centers and the individuals/families we serve is ongoing activity. In order to communicate Title VI requirements under the Public Participation Plan, the Public Notification Form (found on page three) is included in all of the intake paperwork for the four programs that provide transportation services. These four programs include our Transition and Adult Services program, our Early Childhood Education program and our Special Education non-public schools (the Almansor and Westmoreland Academies).

Local Highway Patrol Department

The Institute for the Redesign of Learning has worked in conjunction with the local Highway Patrol to offer training to both staff and drills for students to ensure safety in the case of emergency. This training specifically addresses the needs of populations at risk including disabled, minority and low-income.

Community Resource Fairs

Each year the four programs listed above attended various community resource fairs on numerous occasions in order to educate the community about our program offerings and during these fairs, our transportation program is emphasized and serves as a strong “selling point” for many individuals/families. These resource fairs will attract anywhere from 100 people up to thousands depending on the size of the venue/event. At the majority of these events, a bi-lingual representative is present in order to accommodate any Spanish speakers in order to reach attendees who may be Limited English Proficient.

Local Schools

The Institute for the Redesign of Learning communicates its transportation offerings to schools throughout the South Pasadena community and to date has provided transportation services to El Sereno Middle school in order for their non-ambulatory students to participate in field trips. These services are open to other upon request as well.

Kiwanis Club

The Institute for the Redesign of Learning maintains an on-going partnership with the South Pasadena Kiwanis Club to provide coordinated transportation assistance via the agency's FTA 5310 when requested. Additionally, the Institute's Managing Director maintains membership with the Kiwanis Club, which serves low-income and minority populations.

Annual Satisfaction Surveys

Each year the Institute for the Redesign of Learning conducts Annual Satisfaction Surveys with program participants and stakeholders of the agency to determine level of satisfaction and gain input regarding unmet needs. A portion of this survey is focused on the Institute's transportation services. Results continually yield a high rate of satisfaction as it relates to the Institute's transportation services.

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 the Institute for the Redesign of Learning and overall cost to provide LEP assistance.

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

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

Four Factor Analysis

Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by the Institute for the Redesign of Learning.

The Institute for the Redesign of Learning 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 children, youth and 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 referring school districts or their local regional center. As such, the Institute does not offer transportation to the general public other than in situations involving a coordinated plan with other entities. Therefore, an analysis of public demographic data in Los Angeles County does not represent actual populations served by this program but is offered for comparison purposes only.

The U.S. Census Bureau 2014-2018 American Community Survey (ACS) Language Spoken at Home by the Ability to Speak English estimates that 43.22% of Los Angeles County residents speak English only in their household, leaving 56.78% that speak another language. The table below provides a more detailed breakdown of the languages spoken throughout Los Angeles County.

[U.S. Census Bureau](#)

Los Angeles County, California	Estimate	Percentage
Population Over 5 years	9,396,753	100%
Speak only English	4,062,062	43.22%
Spanish	3,703,685	39.41%
Speak English "very well"	2,076,331	22.09%
Speak English less than "very well"	1,627,354	17.31%
Other Indo-European Languages	513,467	5.4%
Speak English less than "very well"	191,716	2.04%
Asian and Pacific Islander Languages	1,022,270	10.8%
Speak English less than "very well"	530,797	5.6%
Other Languages	110,844	1.1%
Speak English less than "very well"	39,966	0.4%

Historical Analysis of LEP Persons Served by the Institute for the Redesign of Learning

A final source of data to be considered to determine the number of LEP persons likely to be served by this program is a client-by-client analysis of all consumers served in the nearly 46 year history of the program. The Institute started with four students and one classroom in Alhambra in 1974 and has since diversified into six program areas to serve 3,700 children, teens and adults throughout the greater Los Angeles and San Gabriel Valley communities. The demographic breakdown shows that 90% live at or below the poverty level with 72% being Latino/Hispanic, 14% white/Caucasian, 8% Asian/Pacific Islander, and 6% African-American/Black.

In an analysis of the language proficiency of the Hispanic population served, 83% spoke English "very well" and 17% were non-verbal due to their disability. There were **no clients** that spoke English less than "very well". However, in surveying the parents/caregivers of our students/clients, it was found that 37% of parents/caregivers spoke English **less than** "very well".

Additionally, students/clients of the Institute's programs who speak English or any other language less than "very well" typically have developmental disabilities that cause barriers to speech or other forms of communication. **Limited English Proficiency is not present in this population solely due to a language barrier.** Thus, translation of vital documents into a native language is generally ineffective.

An examination of consumers who have exited the program reveals that consumers exited primarily for reasons such as returning to their home district, graduating from the non-public day school programs and/or a change in address causing the Regional Center to refer clients to a program closer to the new address. There were no clients that were underserved or exited the program due to language barriers.

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

As indicated above, historically, contact with LEP consumers has not yet occurred in this program. However, a survey of the agency's phone reception staff indicated calls from LEP persons are received over 50 times per week. The staff indicated that these calls are primarily received from families of students/clients rather than actual program participants (riders).

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 agency staff as appropriate and, at times, by staff during Individual Education Plan (IEP) meetings with the parents/caregivers of our students/clients. Again, the majority of translation occurs with family members, not consumers.

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 Institute for the Redesign of Learning's programming is to provide learning and training opportunities that empower at-risk individuals to take charge of their own learning in order to become competent, caring, and contributing members of their communities. Transportation to and from school/programs is offered daily as a part of the programming. Annual consumer surveys indicate that transportation for Community Integration activities is an important part of the services offered for consumers.

Currently, the Institute for the Redesign of Learning serves 280 students/clients through its transportation program. The length of time an individual is typically enrolled in the program can range from a few months to many years. Consumers are not required to "graduate" and may remain in the program as long as their needs can continue to be met.

While, the Institute for the Redesign of Learning's program is moderate in size, it fills an essential need in the communities it serves and creates opportunities that can enhance the quality of life for children, youth and adults with disabilities.

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

The Institute for the Redesign of Learning's 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 is minimal and has not been quantified. The majority of larger expenses are allocated to programming expenses.

The budget for the Institute for the Redesign of Learning, which provides services through the FTA 5310 grant, is a small fraction of the agency's overall budget. The total annual expenditures for outreach activities is less than \$3,000. This includes enrollment packets that are translated into Spanish, Cantonese, Mandarin and Vietnamese and cultural sensitivity is emphasized. Specific outreach to LEP populations has not been conducted as a reasonably significant number of LEP persons are not been served by this program, as indicated in Factor 1.

SUMMARY

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

- Language proficiency is primarily affected by disability rather than a language barrier alone.
- No consumers were underserved or exited the program due to language barriers.
- Surveyed Agency staff reported over 50 LEP phone calls per week.
- Provision of transit is not considered an "essential" service but is a component of the Institute for the Redesign of Learning's programming.
- The Institute for the Redesign of Learning does not have an LEP specific budget line.
- The Institute for the Redesign of Learning spends less than \$3000 per year on all outreach efforts.

Language Assistance Implementation Plan

Methodologies

Identifying LEP Individuals

As evidenced by the Four Factor Analysis, very few "true" LEP individuals are referred to the Institute for the Redesign of Learning's programs. The predominant minority language in the region is Spanish. The students/clients that are primarily served by the Institute's programs have cognitive, learning, and/or emotional disabilities that affect language proficiency rather than a language barrier alone.

In the nearly 46 year history of the Institute, there were no consumers served who were LEP due strictly to a language barrier. 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 who are fluent in Spanish, Cantonese, Mandarin and Vietnamese provide translation services at all facilities as needed. Documents that are offered in Spanish include:

- Title VI Notice to the Public
- Title VI Complaint Form
- Title VI Complaint Procedures
- 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 Institute's programs, most documents are translated orally.

Communicating Availability of Language Assistance

Individuals who are referred to the Institute for the Redesign of Learning's programs for services are assigned a Case Service Counselor or Program Manager who provides one-on-one guidance and program planning. Case Service Counselors and Program Managers can offer Spanish translation services as needed. Agency reception staff can also offer translation services to guests and consumers' family members as appropriate.

The diverse language options offered by the Institute are also shared by the School Districts and Regional Centers who refer to the agency.

Monitoring

The Institute for the Redesign of Learning maintains an Agency Accessibility Plan which is designed to minimize barriers that are created by architectural factors, environmental factors, attitudinal factors, financial and employment barriers and communication barriers such as language. This plan is reviewed and updated annually.

Satisfaction Surveys for the programs offer an opportunity for consumers and their care givers to provide input or suggest additional services. To date, more options as they relate to translation services have not been requested. The Title VI Plan will also be evaluated and updated every three years.

Employee Training

The Institute for the Redesign of Learning conducts monthly trainings for staff that can include Customer Service and Language Assistance training. We conduct bi-annual trainings prior (prior to the start of the school year) and in the spring that covers Title VI. We inform our employees about Title VI, the complaint procedures and the purpose of the program.

As a part of the Accessibility Plan, the agency encourages staff interest and education in learning to more effectively communicate with individuals served in ABLE's programs. The agency, through its continuing education benefits program, encourages staff to enroll in college and continuing education classes and will reimburse tuition and books upon successful completion of the course up to \$1,200 annually.

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 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."

As previously stated, the Institute for the Redesign of Learning serves individuals with cognitive, learning and/or emotional disabilities who require a high level of supervision. As such, the ability of our students/clients to read and write varies drastically across the program areas. Program documents are generally interpreted orally by Case Service Counselors and Program Managers as needed.

Membership of Non-Elected Committees and Councils

The Institute for the Redesign of Learning does not have a non-elected transit related advisory council at this time.

Title VI Equity Analysis

The Institute for the Redesign of Learning does not have transit related facilities.

Board of Directors Approval of The Institute for the Redesign of Learning's Title VI Program

A RESOLUTION OF THE Institute for the Redesign of Learning's BOARD OF DIRECTORS AUTHORIZING THE TITLE VI COMPLIANCE PLAN FOR THE AGENCY.

WHEREAS, The Institute for the Redesign of Learning 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 the Institute for the Redesign of Learning as follows:

1. The Managing Director is authorized to implement the components of the plan in order to meet Federal requirements.
2. The Managing Director 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 the Institute for the Redesign of Learning, State of California, on this. (Date)

President of the Board