



# **Title VI**

## **Program Update**

Effective: September 20, 2017

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# Introduction

## New Horizons Commitment to Civil Rights

New Horizons is a private, nonprofit organization providing a range of programs and services to individuals with special needs. New Horizons' Greenlight to Mobility (GLM) program provides travel training services to empower individuals to safely access their communities by encouraging further independence, confidence, and mobility through METRO transit education in the San Fernando Valley and City of Santa Clarita, CA. As a recipient of the federally funded New Freedom Grant which provides funding for the GLM Program, New Horizons adheres to Title VI of the Civil Rights Act of 1964 which prohibits discrimination on the basis of race, color, and national origin in programs and services receiving federal financial assistance. New Horizons' Title VI Program has been prepared to ensure that the level and quality of all of its business and the GLM's Travel Training services are provided in a nondiscriminatory manner and that the opportunity for full and fair participation is offered to GLM's participants and other community members. Additionally, through this program, New Horizons has examined the need for services and materials for persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English.

While it is a matter of principle that New Horizons is committed to ensuring that no person is excluded from participation in, or denied the benefits of, or subjected to discrimination in the receipt of any of GLM's services on the basis of race, color or national origin, the contents of this program have been prepared in accordance with Section 601 of Title VI of the Civil Rights Act of 1964 and Executive Order 13116 (Improving Access to Services for Persons with Limited English Proficiency).

**"No person shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal assistance." –Civil Rights Act of 1964**

***“Federal agencies are to examine the services they provide, identify any need for services to those with limited English proficiency, and develop and implement a system to provide those services so LEP persons can have meaningful access to them.” --Executive Order 13166***

Under the Civil Rights Act of 1964, and as a recipient of federal funding under the programs of the Federal Transit Administration (FTA) of the U.S. Department of Transportation (US DOT), New Horizons’ GLM program has an obligation to ensure that:

- The benefits of its Travel Training services are shared equitably throughout the service area;
- The level and quality of Travel Training services are sufficient to provide equal access to all participants in its service area;
- No one is precluded from participating in New Horizons’ GLM’s service planning and development process;
- Decisions regarding service are made without regard to race, color or national origin and that development and urban renewal benefitting a community as a whole not be unjustifiably purchased through the disproportionate allocation of its adverse environmental and health burdens on the community’s minority population; and
- A program is in place for correcting any discrimination, whether intentional or unintentional.

New Horizons’ GLM has engaged the community in the development of this program which included multiple nonprofit organizations and the North Los Angeles Regional Center. To develop a system to provide services to those with limited English proficiency, GLM engaged a number of community organizations and participants.

New Horizons’ Executive Planning Committee governing the GLM program was involved in the development of this program. In March 2014, the Committee approved the content of the program and has now officially adopted this three year update. The responsibility for carrying out New Horizons’ commitment to the Title VI compliance program has been delegated to the VP, Program Operations by the President and Chief Executive Officer of New Horizons. The Human Resources Director is responsible for obtaining, reviewing, and investigating any and all complaints which may come through the complaint procedure. The Title IV program has been prepared using data from the most recent (Year 2010) U.S. Census Data.

# General Requirements

## Notice to the Public

To make New Horizons' GLM participants aware of its commitment to Title VI compliance, and of their right to file a civil rights complaint, New Horizons has presented the following language, in both English and Spanish, on its website [www.newhorizons-sfv.org](http://www.newhorizons-sfv.org), on bulletins at its main offices, and its enrollment package of material distributed to each participant. Translation of the notice to the public in both Armenian and Tagalog will be complete by May 2014.

## Your Civil Rights (Translated materials will be done by 5.2014)

New Horizons operates its programs and services without regard to race, color, and national origin, religion, sex, disability (physical or mental), age, genetic information, marital status, sexual orientation or identity, AIDs/HIV status, medical condition, political views or affiliations in accordance with Title VI Civil Rights Act. Any person who believes they have been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with New Horizons.

For more information on New Horizons' civil rights program and the procedures to file a complaint, please contact Diane Thorsell, Human Resources Director at 818-894-9301; email [dthorsell@newhorizons-sfv.org](mailto:dthorsell@newhorizons-sfv.org) or visit our administrative office at 15725 Parthenia Street, North Hills, CA 91343 from 8:30 am to 4:30 pm Monday through Friday.

A complainant may file a complaint directly with the Federal Transit Administration by filling a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5<sup>th</sup> Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590

If information is needed in another language, contact 800-555-1212.

For more information about New Horizons programs and services, visit [www.newhorizons-sfv.org](http://www.newhorizons-sfv.org).

## Discrimination Complaint Procedures

New Horizons has established a process for participants to file a complaint under Title VI. Any person who believes that she or he has been discriminated against on the basis of race, color, national origin, religion, sex, disability (physical or mental), age, genetic information, marital status, sexual orientation or identity, AIDs/HIV status, medical condition, political views or affiliations by New Horizons staff may file and submit a Title VI complaint. The agency's Title VI Complaint form and complaint procedures are available at our administrative offices and on our website.

The image shows two pages of a form titled 'New Horizons Complaint Form'. The left page is the cover sheet with sections for 'SECTION 1: Filing Information', 'SECTION 2: Filing Information', and 'SECTION 3: Filing Information'. The right page is the main complaint form with sections for 'SECTION 4: Filing Information', 'SECTION 5: Filing Information', and 'SECTION 6: Filing Information'. The form includes fields for name, address, phone, and email, as well as checkboxes for various types of discrimination.

All vital documents, including the Title VI Complaint Procedures, Complaint Form, and Title VI Notice, will be translated into Spanish, Armenian and Tagalog by May 2014.

## The Procedure

Civil rights complaints should be filed immediately. However, New Horizons will investigate complaints up to 180 days after the alleged incident. New Horizons will process complaints that are complete. Once the complaint is received, New Horizons will review it and the complainant will receive an acknowledgement letter informing them whether the complaint will be investigated by New Horizons. New Horizons shall provide appropriate assistance to complainants, including persons with disabilities, or who are limited in their ability to communicate in English. Additionally, New Horizons shall make every effort to address all complaints in an expeditious and thorough manner.

New Horizons has up to thirty days to investigate the complaint. If more information is needed to resolve the case, New Horizons may contact the complainant. The complainant has 30 days from the date of the letter to send requested information to the investigator assigned to the case.

If New Horizons' investigator (from the Department of Human Resources) is not contacted by the complainant or does not receive the additional information within 30 days, New Horizons 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, one of two letters will be issued 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. The letter may be drafted by New Horizons' legal counsel,

and if appropriate, New Horizons’ legal counsel may administratively close the complaint. If this is the case, New Horizons will notify the complainant of the action as soon as possible.

A 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 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:

Federal Transit Administration  
 Office of Civil Rights  
 1200 New Jersey Avenue SE  
 Washington, DC 20590.  
 Title VI Complaint Form

### Active Lawsuits, Complaints or Inquiries Alleging Discrimination

New Horizons’ Human Resources Department maintains a list of active investigations conducted by the Federal Transit Authority (FTA) and entities other than FTA, including lawsuits and complaints naming New Horizons that allege discrimination on the basis of race, color, national origin, religion, sex, disability (physical or mental), age, genetic information, marital status, sexual orientation or identity, AIDs/HIV status, medical condition, political views or affiliations. This list includes the date that the Title VI investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by New Horizons in response, or final findings related to the investigation, lawsuit, or complaint.

As of the writing of this program, there are no complaints pending which alleges discrimination on the grounds of race color, national origin, religion, sex, disability (physical or mental), age, genetic information, marital status, sexual orientation or identity, AIDs/HIV status, medical condition, political views or affiliations.

### Active Lawsuits, Complaints or Inquiries Alleging Discrimination – None.

Type (Investigation, Lawsuit, Complaint)	Date	Summary of Complaint	Status	Action(s) Taken
Race Discrimination	6/15/2012	A manager complained to the Department of Fair Employment and Housing that he was not provided requested financial information because of his race.	DFEH closed the file on 11/26/2012 due to "insufficient evidence."	None.

# New Horizons' GLM PUBLIC PARTICIPATION PLAN

## Key Principles:

New Horizons' GLM's Public Participation Plan (PPP) has been prepared to ensure that no one is precluded from participating in GLM's service planning and development process. It ensures that:

- Potentially affected community members will have an appropriate opportunity to participate in decisions about a proposed activity that will affect their environment and/or health;
- The public's contribution can and will influence New Horizons' GLM program decision making;
- The concerns of all participants involved will be considered in the decision-making process; and
- New Horizons' GLM will seek out and facilitate the involvement of those potentially affected.

Through an open public process, New Horizons' GLM has developed a PPP to encourage and guide public involvement efforts and enhance access to GLM's Travel Training service decision-making process by minority and Limited English Proficient (LEP) populations. The public participation plan describes the overall goals, guiding principles and outreach methods that GLM uses to reach its participants.

## Limited English Proficient (LEP)

LEP refers to persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. It includes people who reported to the U.S. Census that they speak English less than very well, not well, or not at all.

## Early, Continuous and Meaningful:

The steps outlined in the PPP offer continuous and meaningful opportunities for the public to be involved in the identification of social, economic and environmental impacts of proposed program decisions at New Horizons' GLM. It is a guide for how New Horizons' GLM engages its diverse community. New Horizons' GLM may continue to improve its public participation methods over time based on feedback from all of its participants and community members including low-income, minority, and LEP populations, as well as customer and community-based organizations.

## Goals of the Public Participation Plan

The overarching goals of GLM's PPP include:

- **Clear Lines of Influence** - The process clearly identifies and communicates where and how participants can have influence and direct impact on decision making.
- **Diversity** - Participants represent a range of socioeconomic, ethnic and cultural perspectives, with representative participants including residents from low income neighborhoods, ethnic communities and residents from Limited English Proficiency
- **Accessibility** - Every reasonable effort is made to ensure that opportunities to participate are physically, geographically, temporally, linguistically, and culturally accessible.
- **Participant Satisfaction** - People who take the time to participate feel it is worth the effort to join the discussion and provide feedback.
- **Partnerships** - GLM develops and maintains partnerships with communities through the methods described in its public participation plan.

## Objectives of the PPP:

New Horizons' GLM uses its PPP when considering curriculum changes, service hours, and to provide feedback to Metro on challenges presented on bus and train routes while providing travel training services.

## Regional Partnership/Capital Programming:

Not applicable to New Horizons' GLM Travel Training Services.

## GLM's Public Participation Process

### Outreach Efforts – Alerting Potential Participants and Encouraging Engagement:

New Horizons' GLM program is excited to reach out to the greater San Fernando Valley and the City of Santa Clarita community and invite their participation into programs services. Noting the diversity of the Valley, and our commitment to inclusion, we have developed outreach initiatives using various platforms, languages, visuals, and tools. As the GLM program advances, we may adapt and enhance these methods to better reach participants and expand our messaging and methods, which to date include:

- Press releases to local newspapers including Spanish, Armenian and Tagalog;
- Program announcement brochure;
- Direct Mail of brochure to non-profit agencies serving special needs population;
- Website page on the GLM program found on [www.newhorizons-sfv.org](http://www.newhorizons-sfv.org);
- Social Media announcements on GLM using Facebook and Twitter;
- E-blast announcements of program;
- Participation in community expos to share brochure and talk with people regarding or about GLM;
- Placement of flyers in community centers.

## Public Meetings

When considering a program change, New Horizons' GLM program will:

- Publicize or promote proposed changes and public meetings to the public using the methods listed in *Section Outreach Efforts – Alerting Potential Participants and Encouraging Engagement (Page 7)*;
- Schedule meetings at times and locations that are convenient and accessible for minority, low-income, and LEP communities;
- Employ different meeting sizes and formats, including town hall, social media, and community based;
- Coordinate with community organizations, educational institutions, and other organizations to implement public engagement strategies that reach out specifically to members of affected minority and/or LEP communities;
- Host meetings in locations that are ADA complaint and accessible to people with disabilities;
- Consider newspaper ads and local media as well as podcasts that serve LEP populations;
- Utilize press release, mailers or e-blasts to announce public meetings, specifically identifying the time, place, and meeting topic(s);
- All materials, program opportunities, and program policies will be discussed at meetings, as to create an inclusive and transparent program for community members and program participants;
- Materials sent out will be translated into Spanish, Armenian and Tagalog;
  - Other languages will be translated upon request or based on need;
  - A translator will be available, if requested;
- Provide opportunities for public participation through means other than written communication, such as one-on-one interviews or use of audio or video recording devices to capture oral comments;
- Once public meeting is held there will be a week long “comment period” (7 days), where community members can submit feedback on the meetings topic(s);
- Once complete, the GLM team will analyze and summarize all program feedback and present it to the GLM task force for decision making;
- Vital program policies and procedures will be available on New Horizons' GLM program website landing page;
- Additional policies and procedures will be available upon request to community members or program participants.

## New Horizons' GLM Mediums (Bi-lingual)

- Print – Newspapers and other periodicals
- Outdoor – Advertising on-board buses (interior and exterior) and in bus shelters
- Email – [travel@newhorizons-sfv.org](mailto:travel@newhorizons-sfv.org) is established to provide feedback from users
- Social Media – New Horizons' is on Facebook and Twitter with over 600 followers
- Email – New Horizons GLM uses e-blast that reaches over 1500 people
- Direct Mail to Community Partners
- Public Information Sessions

Announcing...



new horizons  
greenlight  
to mobility

Funded by METRO, this program empowers people to use public transportation throughout the San Fernando Valley and City of Santa Clarita by providing free travel training services.

To learn how to successfully and safely take a bus or train to your next destination, contact New Horizons' Travel Training Manager at 818-894-9301 or [travel@newhorizons-fv.org](mailto:travel@newhorizons-fv.org).

[www.newhorizons-fv.org](http://www.newhorizons-fv.org)




new horizons

New Horizons envisions a brighter world in which all individuals are valued for their strengths, courage and joy; where each person is afforded compassion and dignity, equal rights and opportunities; and where there is no longer a difference between the culture of caring we provide at New Horizons and the quality of acceptance and caring provided by the community.



**Partnering for a Brighter Future**  
15725 Parthenia Street, North Hills, CA 91343

Printed materials have been translated in Spanish. Other languages

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new horizons

**Partnering for a Brighter Future**  
SERVING ADULTS WITH DEVELOPMENTAL DISABILITIES SINCE 1954

Home | Who We Are | What We Do | Support Us | Get Involved | Events | Business Solutions | News | Contact Us




New Horizons' **Green Light to Mobility** Program is funded by the Los Angeles County Metropolitan Transportation Authority (Metro). The program is designed to help encourage the use of public transportation through individual and small group instruction and support throughout the San Fernando Valley and City of Santa Clarita.

15725 Parthenia Street | North Hills, CA 91343 | (P) 818-894-9301 (F) 818-894-7301

[GLM Travel Trainers' Prospective Blog](#)  
Coming soon!

[Green Light to Mobility Forms](#)  
Referral Assessment Form  
Consent Form  
Photo Release Form



It starts with a team!

## **Addressing Comments**

### **The Incorporation of Public Comments into Decisions:**

All comments received through the PPP are given careful, thoughtful consideration. Because there are a number of different ways participants or members of the community can comment on proposed curriculum or training service changes, all comments are assembled into a single document for presentation to New Horizons' GLM Task Force.

## **Identification of Stakeholders**

### **Our Community Partners:**

Stakeholders are those who are either directly or indirectly affected by a plan, or the recommendations of that plan. Those who may be adversely affected, or who may be denied benefit of a plan's recommendation(s), are of particular interest in the identification of specific stakeholders. Stakeholders can come from a number of groups including general citizens/residents, minority and low-income persons, public agencies, and private organizations and businesses. While stakeholders may vary based on the plan or program being considered, New Horizons' GLM has assembled a listing of stakeholders with whom we regularly communicate through email and direct mail. A complete list of New Horizons GLM community stakeholders can be obtained by contacting New Horizons' Development Department.

### **Stakeholder List:**

Any community organization or person can be added to New Horizons' GLM stakeholder list and receive regular communications regarding travel training services by contacting the GLM administrative office at (818) 894-9301 Extension 320. Local organizations and businesses can also request that a speaker from GLM attend their regular meeting at the same number or through the New Horizons' website at [www.newhorizons-sfv.org](http://www.newhorizons-sfv.org).

# LANGUAGE ASSISTANCE PLAN

## **Improving Access for People with Limited English Proficiency:**

In order to ensure meaningful access to programs and activities, New Horizons' GLM uses the information obtained in a Four Factor Analysis to determine the specific language services that are appropriate. This analysis helps New Horizons' GLM to determine if it communicates effectively with LEP persons and informs language access planning.

The **Four Factor Analysis** is a local assessment that considers:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by New Horizons' GLM Program;
2. The frequency with which LEP persons come into contact with New Horizons' GLM Program;
3. The nature and importance of New Horizons' GLM Program in people's lives; and
4. The resources available to New Horizons' GLM Program for LEP outreach, as well as the costs associated with that outreach.

## **Factor 1 - Number of LEP Persons in Service Region:**

The first step in determining the appropriate components of a Language Assistance Plan is understanding the proportion of LEP persons who may encounter New Horizons' GLM Program, their literacy skills in English and their native language, the location of their communities and neighborhoods, and, more importantly, if any are underserved as a result of a language barrier.

To do this, New Horizons' GLM program evaluated the level of English literacy and to what degree people in its service area speak a language other than English and what those languages are. Data for this review is derived from the United States Census Bureau "American Fact Finder" web portal data from 2008-2012. Data was reviewed for New Horizons' GLM program service area, which includes: Burbank, Sherman Oaks, Valley Village, Studio City, Fallbrook, Valley Glen, Toluca Lake, Van Nuys, Panorama City, Lake Balboa, Woodland Hills, Tarzana, Encino, Kegal Canyon, Lake View Terrace, Sylmar, San Fernando, Shadow Hills, Mission Hills, North Hills, Granada Hills, La Tuna Canyon, Sun Valley, Pacoima, Northridge, Chatsworth, West Hills, Canoga Park, Hidden Hills, Calabasas, and the City of Santa Clarita.

The information provided has been broken down into two categories: Los Angeles County and the San Fernando Valley, including the City of Santa Clarita.

## Los Angeles County Overview:

Los Angeles County encompasses approximately four-thousand-seven-hundred-fifty-two square miles. Los Angeles County is home to a diverse population speaking more than one-hundred-thirty-five languages. Of Los Angeles Counties total population (9,312,312), 26.5% (2,438,809) residents report speaking English “less than very well.” The most populous groups in the category are shown below. Of the remaining populations, those reporting speaking English “less than very well” range from 0% to 2% of the total County Population.

### Speak English Less than Very Well (County):

Speak English “Less than Very Well”	Population	Total Percentage
Spanish	1,625,989	17.46%
Chinese	206,655	.022%
Tagalog	72,359	.007%
Korean	114,892	.012%
Armenian	89,073	.009%

This data reveals that at the county level, while there are numerous languages spoken at home, there is a significant Spanish speaking population which reports speaking English “less than well.”

### San Fernando Valley (Including the City of Santa Clarita):

New Horizons’ GLM program service area encompasses approximately two-hundred-sixty square miles of Los Angeles County, identified as the San Fernando Valley and the city of Santa Clarita. The San Fernando Valley and the City of Santa Clarita is home to a diverse population speaking more than forty languages (or language groups). Within the San Fernando Valley and the City of Santa Clarita, 24.08% (466,395) of the population of 1,949,026, report speaking a language other than English “less than well”. As suggested by the county-wide data, 39.5% (3,679,358) of Los Angeles County total population speaks Spanish or Spanish Creole, while 32.14% (626,466) of San Fernando Valley residents speak Spanish or Spanish Creole, of which 14.66% (285,809) speak English “less than well.” Second to Spanish is Armenian (130,053) or 6.67%, with approximately half (66,238) or 3.40% reporting speaking English “less than well.” Third to Spanish is Tagalog (62,862) or 3.32%, with approximately (17,860) or .92% reporting speaking English “less than well.”

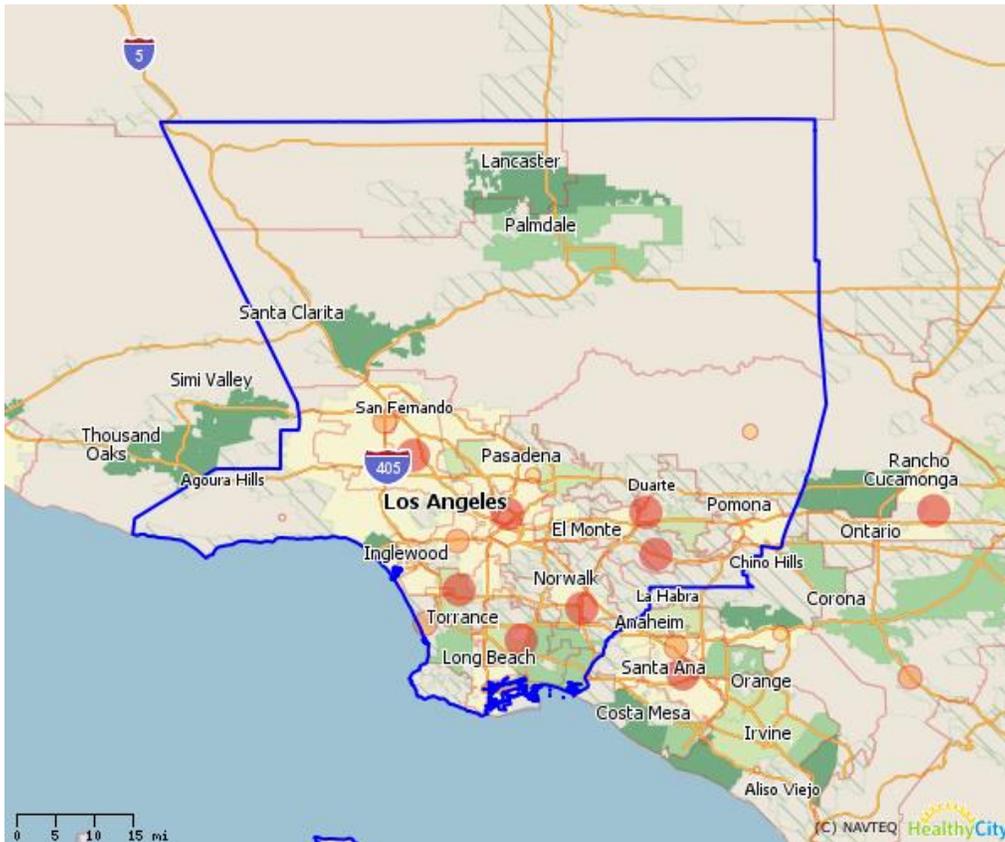
Speak English “Less than Very Well”	Population	Total Percentage
Spanish	285,809	14.66%
Armenian	130,053	6.67%
Tagalog	17,860	.92%

The data reveals that within the serve area, while there are numerous languages spoken at home, there is a significant Spanish speaking population which reports speaking English “less than well.”

## The Locations of the LEP Community

While the need to provide language services to the Spanish speaking population in the New Horizons' GLM program service area is clearly demonstrated in the tables above; it is helpful to understand where in the service area populations of limited English proficiency reside. The map below provides a spatial display of residents who speak Spanish at home and report speaking English "less than well."

### Los Angeles County:



**Language Spoken at Home: Spanish**  
Population, age 5 and over, who primarily speak Spanish and Spanish creole (Spanish, Ladino) in the home.

- 7.1 % - 16.59 %
- 16.6 % - 24.79 %
- 24.8 % - 40.59 %
- 40.6 % - 72.6 %

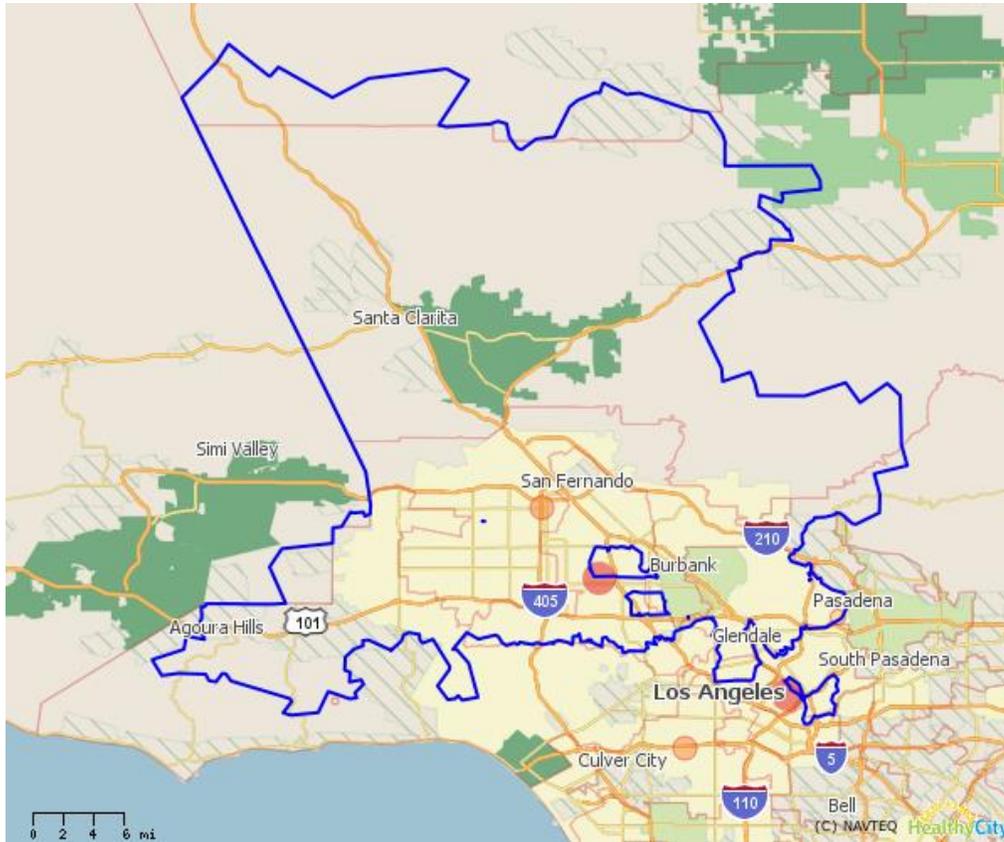
Universe: Population 5 Years and Older. Datasource: American Community Survey 1-Year Estimates. Data Year: 2011. Data Level: Congressional District (2011)

**Language Spoken at Home: English only**  
Population, age 5 and over, who primarily speak English in the home.

- 13.1 % - 45.19 %
- 45.2 % - 56.19 %
- 56.2 % - 65.09 %
- 65.1 % - 82.2 %

Universe: Population 5 Years and Older. Datasource: American Community Survey 1-Year Estimates. Data Year: 2011. Data Level: City / Place (2010)

## San Fernando:



### Language Spoken at Home: Spanish

Population, age 5 and over, who primarily speak Spanish and Spanish creole (Spanish, Ladino) in the home.

- 7.1 % - 16.59 %
- 16.6 % - 24.79 %
- 24.8 % - 40.59 %
- 40.6 % - 72.6 %

Universe: Population 5 Years and Older. Datasource: American Community Survey 1-Year Estimates. Data Year: 2011. Data Level: Congressional District (2011)

### Language Spoken at Home: English only

Population, age 5 and over, who primarily speak English in the home.

- 13.1 % - 45.19 %
- 45.2 % - 56.19 %
- 56.2 % - 65.09 %
- 65.1 % - 82.2 %

Universe: Population 5 Years and Older. Datasource: American Community Survey 1-Year Estimates. Data Year: 2011. Data Level: City / Place (2010)

New Horizons' GLM program has long been aware of the significant Spanish speaking population in its service area. The above map(s) indicate locations where this population is concentrated in the service area; most notably in the Van Nuys, Panorama City and North Hills areas. It is also noteworthy that there are "pockets" of residents reporting speaking English "Less than Well" in Northridge and Granada Hills.

Several conclusions can be drawn from this review:

- 24.08% of residents of the San Fernando Valley report speaking English “less than well”:
- Of those reporting speaking English “less than well”, the largest population speaks Spanish or Spanish Creole;
- The LEP population Spanish or Spanish Creole speaking has a concentrated presence in and around New Horizon’s GLM program service area;
- Beyond those reporting speaking Spanish or Spanish Creole at home and speaking English “less than very well,” there is two other LEP populations including Armenian and Tagalog (populations are 130,053 and 8,887, respectively) for the San Fernando area, which meet the “Safe Harbor” threshold for which translation of vital documents will occur;
- Beyond those reporting speaking Spanish or Spanish Creole at home and speaking English “less than very well,” there are two other LEP populations including Armenian and Tagalog (populations are 66,238 and 17,860, respectively) for New Horizons’ GLM program, which meet the “Safe Harbor” threshold for which translation of vital documents will occur.

## **Factor 2 - Frequency of LEP Use**

There are a fair number of places where New Horizons’ GLM program participants and members of the LEP population can come into contact with agency services, including the use of fixed route buses and trains, calls to agency representatives, travel trainers, and agency outreach materials. An important part of the development of New Horizons’ GLM Language Access Plan is the assessment of major points of contact including:

- Communication with New Horizons’ GLM program staff;
- Printed outreach materials;
- Web-based outreach materials;
- Social Media;
- Public meetings;
- Local news media (print and radio).

To better understand the frequency with which LEP riders come into contact with New Horizons’ GLM services, data is collected on each participant. The objective is to evaluate the needs of New Horizons’ GLM participants who are not able to communicate in English. Here are the steps taken to collect this data:

1. A referral is received, which indicates all demographic data, including primary and secondary language(s);
2. An assessment is scheduled at a time most convenient to the participant;
3. An assessor will be matched, based on language(s) known if possible, to what was indicated on the referral;
4. While conducting the assessment, verification of language(s) spoken occurs;

- If approved for travel training, the travel trainer will, if possible, speak the language(s) spoken in the home to help encourage participation and the transference of learning.

In addition to the above, the GLM team routinely discusses the program’s inclusive practices at the staff meeting. The predominate language encountered, other than English, is Spanish. We have five travel trainers who are bilingual in Spanish. GLM staff are able to access Farsi, Armenian and Tagalog speaking staff who are currently employed at New Horizons, to provide both verbal and written translations.

The table below indicates languages currently represented in the GLM program and the number of times each language has come into contact. The table also indicates individuals who requested additional assistance for translation.

	<b>Number encountered</b>	<b>Number Requested Assistance</b>
Spanish	146	100
Korean	26	26
Armenian	7	0
Farsi	35	35

In order to better meet the language needs of current or future GLM participants, all vital program materials have been translated into Spanish. Notices for program services have been translated into Armenian and Tagalog. In the event a language is spoken that is not available through current GLM staff, a volunteer or contracted translator will be utilized.

To ensure that the GLM program is monitoring and evaluating the language needs of participants, an internal language audit will be conducted once a year. The internal audit looks at data collected over the prior six month period, in both the physical participant file and the data base. The information gathered will help the decision making process on how to better reach and teach individuals, or small groups, on how to use public transportation in a safe and effective manner.

To further explore the language needs, every three years the GLM program will explore the US Census information to see how the language needs of the community have changed. Feedback from community meetings is obtained regarding our services and any need to make significant changes. Over the past three years, there has been no significant changes to our program. Should a community forum be needed in the future, the following questions will be examined:

- Did the public know there was an opportunity to participate in travel training activities?
- Was the purpose of the participation clearly articulated to the public?
- Did the public have access to appropriate resources and information to allow for meaningful participation?
- Did the decision making process allow for consideration and incorporation of public input?
- Were there complaints about the public engagement process?
- Should the Public Participation Process or Language Assistance Plan be amended?

# Community Partners

We have continued to explore, with all of our many partners, the extent to which they come into contact with LEP populations and how we can better out to those clients with LEP. Responses are in line with the numbers we have obtained over the past three years through our program services. Spanish is the language spoken most often where there is limited English proficiency.

## Community Partners

- North Los Angeles County Regional Center
- Tierra Del Sol Foundation
- The Help Group
- Valley Village
- Miller Career Transition Center
- WorkSource Centers
- Leichman Career Transition Center
- Kennedy High School
- Sylmar High School
- Villa Esperanza Services
- New Economic for Women

## Factor 3: The Importance of New Horizons' GLM Program to People's Lives

The use of public transportation is important to individuals, as it allows for greater access to community resources, employment and education. Access to an individual's community has shown an increase in an individual's sense of belonging, helps to develop a stronger self-esteem, encourages socialization and motivates individuals to gain employment or pursue higher education. Critical services that are offered by New Horizons' GLM program include: (1) route familiarization and (2) travel training, both of which encourage an individual's access to their community, and in many cases, beyond.

New Horizons' GLM program aims to encourage the skills needed for a person to engage in their community, by assisting in the development of the following skills:

- Identifying Information on how to ride;
- Safety and security information based on one's route(s);

- Specifically targeting community safety and emergency response.
- How to locate fare and payment information;
- How to locate, read and interpret route and schedule information;
- Personal and community based advocacy;
- Communication related to travel training planning;
- How to build and maintain natural support systems;
- How to apply for a discounted TAP Card, if applicable;
- And, if applicable how to transfer from one mode of transportation to another (i.e. bus to train).

If limited English is a barrier to these services, then the consequences to the individuals may include and is not limited to access to employment and vocational training, socialization with peers, healthcare, community independence with daily living skills (i.e. grocery shopping, medical appointments, and banking), and educational opportunities. Important information from New Horizons' GLM program which may affect access includes:

- Information on how to ride
- Safety and security information based on one's route
- Fare and payment information
- Route and schedule information
- Complaint forms and feedback surveys
- Communication related to travel training planning
- What to do in an emergency.

**Factor 4:** Internal resources for outreach for disadvantaged populations/LEP

New Horizons' GLM program has committed resources to improving access to its services and programs for LEP persons. Bilingual information (English/Spanish) will be distributed in a number of mediums which will include and is not limited to:

- A bi-lingual English/Spanish website;
- Multi-language informational material to include English/Spanish/Armenian/Tagalog;
- Bilingual English/Spanish outreach materials (brochures, announcement cards);
- Bilingual English/Spanish representations at public meetings or reasonable accommodations for other language interpreter requests;
- Bilingual English/Spanish (or other language as needed by the participant) travel trainers;
- Bilingual English/Spanish training materials.

# Oversight Monitoring

The result of the Four Factor Analysis concludes that Spanish or Spanish Creole, Armenian and Tagalog are the LEP language groups that meet the “Safe Harbor” threshold. New Horizons will provide outreach and language assistance including, translation of vital documents, to LEP individuals that speak Spanish, Armenian, and Tagalog speaking individuals. New Horizons will inform LEP community members of our language assistance by publishing translated materials, posting translated messages on New Horizons’ website, communicating translated services during one-on-one and small group trainings, and program presentations.

## Translation of Vital Documents

GLM will be translated into Spanish, Armenian and Tagalog:

- Civil Rights Notice, Civil Rights Policy, and Civil Rights Complaint Form – Translated into Spanish, Armenian and Tagalog;
- Program Informational Announcement Card—Translated into Spanish by; and will be translated into Armenian and Tagalog as needed;
- Other marketing materials translated into Spanish, Armenian and Tagalog on an as needed basis.

Additionally:

- There is a need to translate documents and outreach materials into Spanish (New Horizons’ GLM program uses Spanish for “Latin Americans living in the United States” for its translations);
- Additional language services would benefit other LEP populations, although the likely encounters with the service are significantly lower than the Spanish speaking group.

## Evaluating and Updating the Language Assistance Plan and Public Participation Process

Marketing and Outreach to the community we serve is ongoing; the responsibility for this outreach has been delegated to the Mobility Training Services Administrator to ensure compliance with New Horizons’ GLM program Title VI Plan, PPP, Language Assistance Plan, and other community outreach efforts. The monitoring of the Language Assistance Plan will include:

- Annual reviews of regional census data for changing patterns of LEP populations;
- Ongoing collaboration with community organizations;
- Annual Assessment(s) of the Plan.

## **Annual Assessments**

In order to ensure this policy is effectively reaching minorities, low-income, and LEP populations, an overall evaluation of its effectiveness will be conducted every three years. As with the language assistance plan, the evaluation will look at the following information:

- Total number of individuals who participated who are considered a protected class under Title VI and the outreach efforts utilized to reach those participants;
- Total number of community engagement activities GLM participated, which will identify the who, what, where and when;
- A review of community engagement activities, including feedback from current or future participants, community members or partnered agencies;
- A review of documented complaints regarding community engagements, participation or the overall travel training process;
- A summary of expected changes to be implemented to reasonably rectify any complaints regarding community engagements, participation, or the overall travel training process;
- Should any part of this policy be amended?

## **Training Employees**

As part of regular and on-going training for GLM Travel Trainers, staff receive ongoing training on diversity, inclusive practices and language. Trainings are based on current information and where available evidence based training reports and research.

# DECISION MAKING BODIES

## GLM Task Force:

This employee-based internal committee is comprised of staff from marketing and development, Mobility Training Services Administrator, travel trainers, and program coordinator. It meets regularly to discuss possible service and outreach modifications.

To encourage diverse representation, the GLM Task force pulls from multiple New Horizons’ departments, which represents a diverse offering of protected Title VI populations. A need to look outside of New Horizons’ is currently not done because the onsite Human Resource department does recruiting at multi-locational job fairs and outreach to community churches, academic institutions, business and forums to encourage a diverse work force, representing a large number of protected Title VI populations. For example, New Horizons’ current workforce is made of up the following:

Below is a current breakdown of the GLM Task Force, by race or ethnicity:

Body	Caucasian	Latino	African American	Asian American	Native American	Other
GLM Task Force	8	1	1	1	0	1

# PROGRAM SPECIFIC REQUIREMENTS

## Title VI Monitoring:

The results of the ongoing monitoring of service standards can be obtained by contacting the VP Program Operations or Human Resources Director at New Horizons.

## Sub-recipient Compliance:

New Horizons is a sub-recipient of Los Angeles Metro.

## DETERMINATION of SITE—FTA PASS-THROUGH FUNDS

Title 49 CFR Section 21.9(b)(3) states “In determining the site or location of facilities, a recipient or applicant may not make selections with the purpose or effect of excluding persons from, denying them the benefits of,

or subjecting them to discrimination under any program to which this regulation applies, on the grounds of race, color, national origin, [religion, sex, disability (physical or mental), age, genetic information, marital status, sexual orientation or identity, AIDs/HIV status, medical condition or political views or affiliations]; or with the purpose or effect of defeating or substantially impairing the accomplishment of the Act or this part.” Title CFR part 21, Appendix C, Section (3) (iv) provides, “The location of projects requiring land acquisition and the displacement of persons from their residences and businesses may not be determined on the basis of race, color, national origin, [religion, sex, disability (physical or mental), age, genetic information, marital status, sexual orientation or identity, AIDs/HIV status, medical condition or political views or affiliations].”

New Horizons’ has not used any FTA Pass-through funds for the purpose of determining a site or location for facilities, land acquisition, or displacing persons for any reason, therefor no equity analysis is needed.

## **GRANTS, REVIEWS and CERTIFICATIONS**

### **Pending Applications for Financial Assistance:**

New Horizons has one pending application for federal assistance under the Housing and Urban Development Section 811 program, Housing for Persons with Special Needs.

### **Pending FTA Grants:**

- None

### **Open FTA Grants:**

- None

### **Civil Rights Compliance Reviews in the Past 3 Years:**

New Horizons has not had any Civil Rights Compliance Reviews in the past three years.

# CONTACT

For additional information on New Horizons' GLM program Title VI Plan, or its efforts to comply with the Civil Rights Act of 1964 or Executive Order 13166 Improving Access to Services for Persons with Limited English Proficiency, please contact:

Roschell Ashley, Interim CEO, New Horizons  
New Horizons: Serving Individuals with Special Needs  
15725 Parthenia Street  
North Hills, CA 91343  
Tel: (818)894-9301 Extension 328  
E-Mail: [rashley@newhorizons-sfv.org](mailto:rashley@newhorizons-sfv.org)

