

# work**training** center

A NON PROFIT

## 2023 Title VI Plan

Approved by Work Training Center Board of Directors

This document was prepared by Work Training Center to comply with the 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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## INTRODUCTION

### *What is Title VI?*

Title VI is a Federal statute that prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance.

### *To whom does the authority of Title VI apply?*

Title VI is a Federal law that applies to recipients and sub-recipients of Federal financial assistance, and not to the United States Department of Transportation (DOT) itself. As a recipient of federal funds, Work Training Center's Transportation Department is required to prepare a Title VI Plan and make it available at all locations.

Under Title VI, DOT has the responsibility to provide oversight of recipients (WTC) and to enforce their compliance with Title VI, to ensure that recipients do not use DOT funds to subsidize discrimination based on race, color, or national origin.

## OPERATIONS

Incorporated in 1960, Work Training Center's (WTC) mission is, "to assist and support people with disabilities to enhance the quality of their lives through increased independence in work and leisure activities." Each day, WTC provides services to individuals with minor to severe physical and/or developmental disabilities throughout Butte County.

WTC Transportation provides door-to-door round trip services for individuals attending WTC programs, as well as other Far Northern Regional Center programs. Rides are provided Monday through Friday, 6:00am to 6:00pm. Additionally, transportation vehicles are used at varying times throughout the year based on the needs of other local agencies that WTC assists. Work Training Center works in cooperation with B-Line Paratransit, Dial-A-Ride services, Far Northern Regional Center, Chico Area Recreation District (CARD), Durham Recreation & Park District, ARC of Butte County, Ability First, and Special Olympics of Butte County. WTC vehicles are also made available for emergency backup use by the B-Line Paratransit.

## WORK TRAINING CENTER TITLE VI NOTICE TO THE PUBLIC

### **Work Training Center Title VI Notice to the Public Notifying the Public of Rights Under Title VI**

Work Training Center 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 Work Training Center.

For more information of Work Training Center's civil rights program, and the procedures to file a complaint, contact (530) 343-7994, or visit our administrative office to 80 Independence Cir. Suite 200 Chico, Ca 95973. For more information, visit [www.wtcinc.org](http://www.wtcinc.org).

A complaint may file a complaint directly with the Federal Transit Administration 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 (530) 343-7994.

**Notificar al publico de los derechos bajo el titulo VI  
Work Training Center**

Work Training Center, opera sus programas y servicios sin respect a raza, color y origen nacional con arreglo al titulo VI de la Civil Ley de derechos. Cualquier persona que cree que el o ella ha sido agraviado por cualquier practica discriminatoria illegal bajo el titulo VI puede presentar una queja con Work Training Center.

Para obtener mas informacion sobre el programa derechos civiles capaz de industrias y el procedimientos para presentar una queja, llame al (530) 343-7994, o visite nuestra oficina administrative en 80 Independence Cir. Suite 200. Para mas informacion visite [www.wtcinc.org](http://www.wtcinc.org).

Un demandante puede presentar una queja directamente con el Federal Transit Administration por archivar una queja directamente con la Office of Civil Rights, Attention: Title VI ProgramCoordinator, East Building, 5th floor-TV, 1200 New Jersey, SE, Washington, DC 20590

Si se necesita información en otro idioma, contact al (530) 343-7994.

## LOCATIONS WHERE TITLE VI NOTICE IS POSTED

Work Training Center Title VI notice to the public is currently posted at the following locations:

<b>Location Name</b>	<b>Address</b>	<b>City</b>
Administration	80 Independence Circle, Suite 200	Chico, CA 95973
Client Services Building	2952 Esplanade, Suite 100	Chico, CA 95973
Fair Earth Nursery	2234 Park Avenue	Chico, CA 95928
Feather River Industries	1811 Kusel Road	Oroville, CA 95966
Inside Out Landscaping & Janitorial	2230 Park Avenue	Chico, CA 95928
Nexus - Chico	2201 Pillsbury Road, Suite 142	Chico, CA 95926
Nexus - Oroville	2075 Baldwin Avenue, Suite 6	Oroville, CA 95966
Park Ave. Shop	2230 Park Avenue	Chico, CA 95928
Website	wtcinc.org	
Fleet Vehicles Binders		Chico/Oroville

## TITLE VI COMPLAINT PROCEDURES

As a recipient of federal dollars, Work Training Center 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. Work Training Center's Title VI Complaint Procedure is consistent with guidelines found in the Federal Transit Administration Circular 4702.1B, dated October 1, 2012.

### **Discrimination Complaint Procedure**

1. Any person who believes that he or she, individually, as a member of any specific class, or in connection with any disadvantaged business enterprise, has been subjected to discrimination prohibited by Title VI of the Civil Rights Act of 1964, the American with Disabilities Act of 1990, Section 504 of the Vocational Rehabilitation Act of 1973 and the Civil Rights Restoration Act of 1987, as amended, may file a complaint with Work Training Center. A complaint may also be filed by a representative on behalf of such a person(s). All complaints will be referred to the Work Training Center Director of Operations and/or HR Generalist for review and action.
2. To have the complaint considered under this procedure, the complainant must file the complaint no later than 180 days after:
  - a. The date of alleged act of discrimination; or
  - b. Where there has been a continuing course of conduct, the date on which that conduct was discontinued.

Work Training Center's Director of Operations and/or HR Generalist may extend the time for filing or waive the time limit in the interest of justice, as long as the reason for so doing is specified in writing.

3. Complaints shall be in writing and shall be signed by the complainant and/or the complainant's representative. Complaints shall set forth as fully as possible the facts and circumstances surrounding the alleged discrimination. In the event that a person makes a verbal complaint of discrimination to an officer or employee of Work Training Center and/or volunteers, the person shall be interviewed by Work Training Center's Director of Operations. The Work Training Center Director of Operations or HR Generalist will assist the person in putting the complaint in writing and submitting the written version of the complaint to the person for signature. The complaint shall then be handled according to Work Training Center's investigative procedures.
4. Within 10 days, the Work Training Center Director of Operations and/or HR Generalist will acknowledge receipt of the allegation, inform the complainant of action taken or proposed action to process the allegation, and advise the complainant of other avenues

of redress available, such as the California Department of Transportation (Caltrans) and the Federal Transit Administration (FTA).

5. The recipient will advise Caltrans and/or FTA within 10 days of receipt of the allegations. Generally, the following information will be included in every notification to Caltrans and/or FTA
  - a. Name, address, and phone number of the complainant
  - b. Name(s) and address(es) of alleged discriminating staff/volunteer(s)
  - c. Basis of complaint (i.e., race, color, or national origin)
  - d. Date of alleged discriminatory act(s)
  - e. Date of complaint received by the recipient
  - f. A statement of the complaint
  - g. Other agencies (local, state, or Federal) where the complaint has been filed
  - h. An explanation of the actions Work Training Center has taken or proposed to resolve the issue in the complaint
6. Within 60 days, the Director of Operations and/or HR Generalist will conduct an investigation of the allegation and based on the information obtained, will render a recommendation for action in a report of findings. The complaint should be resolved by informal means whenever possible. Such informal attempts and their results will be summarized in the report of findings.
7. Within 90 days of receipt of the complaint, the Director of Operations and/or HR Generalist will notify the complainant in writing of the final decision reached, including the proposed disposition of the matter. The notification will advise the complainant of his/her appeal rights with Caltrans and/or FTA, if they are dissatisfied with the final decision rendered by Work Training Center. The Work Training Center Director of Operations will also provide Caltrans and/or FTA with a copy of this decision and summary of findings upon completion of the investigation.

A case can be administratively closed if the complainant no longer wishes to pursue their case. After the investigator reviews the complaint, he/she will issue one of two letters to the complainant: a closure letter, or a letter of finding (LOF). A closure letter summarizes the allegations, states that there was not a Title VI violation, and that the case will be closed. An LOF summarizes the allegations, the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of staff, or other action will occur. If the complainant wishes to appeal the decision, he/she has 10 business days after the date of the letter to do so.



8. Contact information for the Title VI administrative jurisdictions is as follows:

Federal Transit Administration

Office of Civil Rights

Attn: Title VI Program Coordinator East Building, Fifth Floor – TCR

1200 New Jersey Avenue

SE Washington, DC 20590

**TITLE VI COMPLAINT FORM**

**COMPLAINT FORM (Please write legibly)**

<b>Section I:</b>		
1. Name		
2. Address:		
3. Primary Phone:		Secondary Phone:
4. Email Address:		
5. Accessible Format Requirements	<input type="checkbox"/> Large Print	<input type="checkbox"/> Audio Tape
	<input type="checkbox"/> TDD	<input type="checkbox"/> Other
<b>Section II:</b>		
6. Are you filing this complaint on your own behalf?	Yes*	No
*If you answered "yes" to #6, go to Section III.		
7. If you answered "no" to #6, what is the name of the person for whom you are filing this complaint? Name:		
8. What is your relationship with this individual:		
9. Please explain why you have filed for a third party:		
10. Please confirm that you have obtained permission of the aggrieved party to file on their behalf.	Yes	No
<b>Section III:</b>		
11. I believe the discrimination I experienced was based on (check all that apply)		
<input type="checkbox"/> Race	<input type="checkbox"/> Color	<input type="checkbox"/> National Origin
12. Date of alleged discrimination (mm/dd/yyyy):		

13. Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include 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.

**Section IV:**

14. Have you previously filed a Title VI complaint with Work Training Center?

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 \_\_\_\_\_  State Court \_\_\_\_\_

Local Agency \_\_\_\_\_

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 of other information that you think is relevant to your complaint.

Signature and date are required below to complete form.

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Signature

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Date

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

Work Training Center  
Director of Operations - Julie Ellen  
PO Box 9319  
Chico, Ca 95927

## LIST OF TRANSIT-RELATED TITLE VI INVESTIGATIONS, COMPLAINS, AND LAWSUITS

Work Training Center has not been involved in any transportation-related Title VI investigations, lawsuits or complaints.

**Work Training Center List of Investigations, Lawsuits, and Complaints**

Type of Process	Date	Summary (including basis of complaint)	Status	Action(s) Taken
<b>Investigations</b>				
1. None				
2				
<b>Lawsuits</b>				
1. None				
2				
<b>Complaints</b>				
1. None				
2				

## PUBLIC PARTICIPATION PLAN

### Background

Work Training Center (WTC) is a non-profit 501(c)(3) organization whose mission is to assist and support people with disabilities to enhance the quality of their lives through increased independence in work and leisure activities. Individuals who receive WTC transportation services are referred to WTC by Far Northern Regional Center (FNRC). WTC programs work in conjunction with FNRC and other agencies in the area to achieve various outreach opportunities.

WTC program participants have developmental and/or physical disabilities that range from moderate to severe. Generally, any documents presented to participants are translated orally depending on level of disability. An estimated 85% WTC participants live in care homes or with their families.

Given the private nature of the program and its limited exposure, the scope and provision of transportation services would have minimal impact on the general public in the geographic area. Nevertheless, WTC does maintain systems to gather stakeholder input regarding agency services and conducts public relations and outreach activities in order to create meaningful opportunities for public engagement as outlined below.

## **Purpose 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 “assist and support people with disabilities to enhance the quality of their lives through increased independence in work and leisure activities.” At every opportunity through prescribed methods the agency will solicit input from stakeholders to best support persons served without creating disproportionately high and adverse human health or environmental effects on minority and/or low-income populations.

## **Summary of Outreach Efforts**

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

### **Board Meetings Open to the Public**

Work Training Center’s monthly board meetings are open to the public and announced on the agency’s website.

### **Butte County Office of Emergency Services**

Work Training Center has worked in conjunction with Butte County Office of Emergency Services for several years on the Butte County Evacuation Plan. This plan specifically addresses the needs of populations at risk including disabled, minority, and low-income. This partnership also includes a coordinated plan in which this agency will provide vehicles, transportation, and shelter during evacuation emergencies.

### **Community Events**

Work Training Center participates in community events throughout the year to promote the services available.

### **Social Media**

Work Training Center posts notices and announcements on the agency’s social media.

### **Work Training Center Website**

Work Training Center posts notices and announcements on the agency’s website.

## LIMITED ENGLISH PROFICIENCY (LEP) PLAN

### Purpose of 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 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 organization'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.

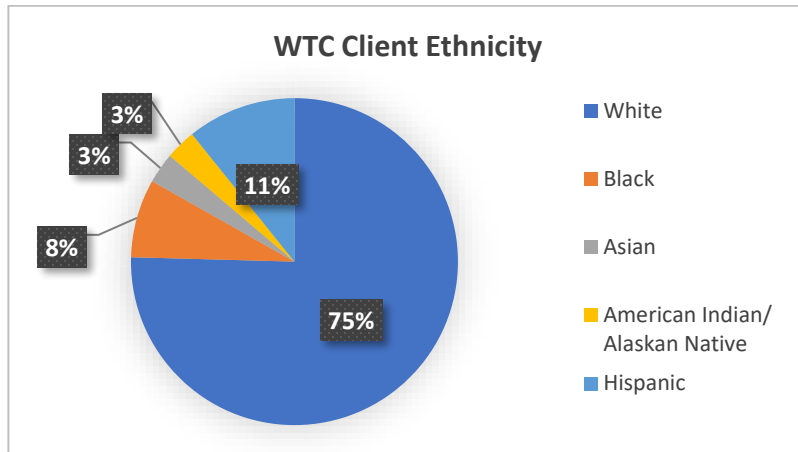
The United States Department of Transportation (DOT) published guidance that directed its recipients to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for LEP customers. ACC Senior Services Language Assistance Plan includes a four factor analysis and implementation plan that complies with the requirements of DOT LEP guidance.

### Four Factor Analysis

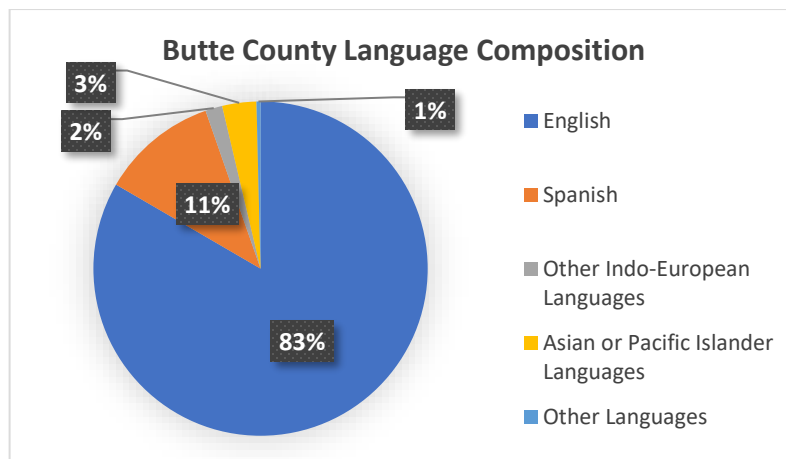
#### **Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by Work Training Center.**

Work Training Center holds a unique position regarding meeting the Title VI requirements. As a sub-recipient of FTA 3010 grant funding, the agency's focus is primarily to transport adults with disabilities where current public transit options are insufficient or do not exist. Eligible WTC program participants or "riders" are referred into the program from Far Northern Regional Center (FNRC). As such, WTC 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 Butte County does not represent actual populations served by this program but is offered for comparison purposes only.

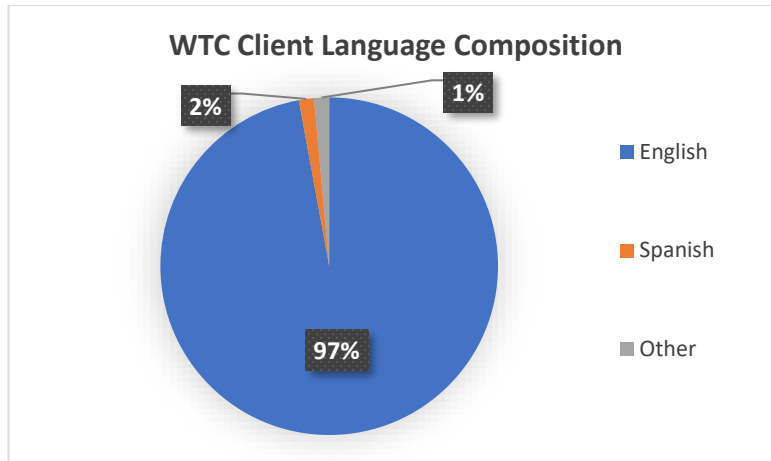
There are two sources of data that most accurately represent LEP persons likely to be served by WTC. The FNRC purchase of services (POS) authorizations, expenditures and utilization by different demographic categories including language. WTC receives cases histories of each program participant and maintains database of information. A historical analysis of this database regarding language proficiency of all past and present participants will reflect actual proportions of LEP persons served.



**American Community Survey:** The U.S. Census Bureau 2017-2021 American Community Survey (ACS) "Social Characteristics in the United States" estimates that of the 197,399 Butte County Residents 5 years and over, 8,774 state that they speak English less than "very well". Of the same total number of County residents, 32,802 speak languages other than English; such as 22,273 speak Spanish; 3,240 speak other Indo-European languages; 6,522 speak Asian or Pacific Islander; and 767 speak other languages.







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

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, at most, 1-2 times per month. The staff indicated that these calls are primarily received from families or care providers of consumers rather than actual program participants (riders). In a similar survey at WTC, reception staff revealed that they very seldom receive phone calls from LEP persons and have encountered only a few family members or care providers of consumers who are LEP over their time with the program.

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 FNRC staff during consumer planning meetings. 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 WTC is to provide training opportunities that foster personal growth for individuals with disabilities. Transportation during community integration training is offered daily as part of the service in addition to transportation to and from adult day programs. Annual consumer surveys indicate that transportation for community integration activities is an important part of the services offered to consumers.

The length of time an individual is typically enrolled in the program can range from few months to many years. Consumers are not required to “graduate” and may remain in the programs as long as their needs can continue to be met. WTC does create opportunities that can enhance the quality of life for adults with disabilities.

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

WTC'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 and programs. The cost for translation of documents is minimal and has not been quantified.

The budget for WTC Transportation Department, which provides services through the FTA 5310 grant, is a small fraction of the organization's budget. Specific outreach to LEP populations has not been conducted as we do not have a reasonably significant number of LEP persons needing translated materials. If a request for translated materials is requested, WTC would gladly make every effort to accommodate.

## **LANGUAGE ASSISTANCE IMPLEMENTATION PLAN**

### **Identifying LEP Individuals**

As explained in the Four Factor Analysis, very few true LEP individuals are referred to the Work Training Center programs. The predominant minority language in the region is Spanish. The consumers that are served by WTC programs have disabilities that affect language proficiency rather than a language barrier alone.

While there is a substantial minority population in the region, no funds were allocated to language translation. WTC does, however, have systems in place to provide access to minority populations.

Upon acceptance into WTC programs, each individual goes through an intake process where potential language barriers are assessed and appropriate translation materials are provided.

### **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 can provide translation services as needed for documents including:

- Title VI Notice to the public
- Title VI Complaint Form
- Title VI Complaint Procedures
- Consumer Program Handbook including ABLE Grievance Policy

Other documents can be translated to Spanish orally and/or written as appropriate or upon request. Due to the low literacy rate of consumers in the Work Training Center programs, most documents are translated orally.

### **Communicating Availability of Language Assistance**

Individuals who are referred to WTC programs for services undergo an intake process where language barriers are assessed. If appropriate, the individual is assigned to a staff for one-on-

one guidance in their preferred language. Administrative staff can also offer translation services to guests and consumers' family members as appropriate.

### **Monitoring**

WTC tracks and observes our processes to ensure compliance with Title VI. Satisfaction Surveys for the program offer an opportunity for participants and their care givers to provide input or suggest additional services. To date, translation services have not been requested.

The Title VI plan will also be evaluated and updated every three years.

### **Employee Training**

WTC conducts monthly in-service training for staff that can include Customer Service and Language Assistance training. As part of the Accessibility Plan, the agency encourages staff interest and education in learning to more effectively communicate with individuals served in programs.

### **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, WTC programs serve individuals with developmental disabilities who benefit from oral communication. Program documents are generally translated by staff as needed.

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

Work Training Center for the Handicapped, Inc. does not have a non-elected transit related advisory council at this time.

### **Title VI Equity Analysis**

Work Training Center for the Handicapped, Inc. does not have transit related facilities.

### **RACIAL BOARD BREAKDOWN**

There are currently 6 Board members on the Work Training Center Board of Directors. The racial makeup of the board is 100% Caucasian.

## **BOARD OF DIRECTORS APPROVAL OF WORK TRAINING CENTER TITLE VI PROGRAM**

A RESOLUTION OF THE WORK TRAINING CENTER BOARD OF DIRECTORS AUTHORIZING THE TITLE VI COMPLIANCE PLAN FOR THE AGENCY.

WHEREAS, Work Training Center 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 Requirements 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 Work Training Center as follows:

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

PASSED AND ADOPTED by the Board of Directors of Work Training Center for the Handicapped, Inc. in Butte County, State of California, on this 13th day of April, 2023.

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Lance McClung, Board President