

Help Central Inc

Butte County Information and Referral
Connecting People to Health and Human Services

www.helpcentral.org 530.774.2191 helpcentral@ncen.org

TITLE VI PROGRAM

Developed: October 30, 2015

**Revised and Approved by Help Central Inc. Board of Directors:
April 13, 2021**

**Help Central Inc.
326 Huss Dr. Suite 100
Chico, CA 95928
530-774-2191**

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INTRODUCTION

This document was prepared by Help Central Inc. 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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Help Central Inc. Title VI Notice to the Public

Notifying the Public of Rights Under Title VI

Help Central Inc.

- Help Central Inc. operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with Help Central Inc..
- For more information on Help Central Inc. civil rights program, and the procedures to file a complaint, contact 530-774-2191, or visit our administrative office at 326 Huss Dr. Suite 100, Chico, CA. For more information, visit www.HelpCentral.org or email helpcentral@ncen.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 530-774-2191.

Notificar al público de los derechos bajo el título VI

Help Central Inc.

- Help Central Inc. 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 Help Central Inc.
- Para obtener más información sobre el programa derechos civiles capaz de industrias y el procedimientos para presentar una queja, llame al (530) 774-2191, o visite nuestra oficina administrativa en 326 Huss Dr. Suite 100, Chico, CA. Para más información información, visite www.HelpCentral.org or email helpcentral@ncen.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 530-774-2191.

List of Locations Where Title VI Notice Is Posted

Help Central Inc. notice to the public is currently posted at the following locations:

Location Name	Address	City
Help Central Inc. Butte-Glenn 211 Call Center Public Lobby	326 Huss Dr. Suite 100	Chico, CA

The Title VI notice and program information is also provided on Help Central Inc.'s website at www.HelpCentral.org.

Title VI Complaint Procedures

As a recipient of federal dollars, Help Central Inc. is required to comply with Title VI of the Civil Rights Act of 1964 and ensure that services and benefits are provided on a non-discriminatory basis. Help Central Inc. has in place a Title VI Complaint Procedure, which outlines a process for local disposition of Title VI complaints and is consistent with guidelines found in 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 Help Central Inc. may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form. Help Central Inc. investigates complaints received no more than 180 days after the alleged incident. Help Central Inc. will only process complaints that are complete.

Within 10 business days of receiving the complaint, Help Central Inc. will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office. Help Central Inc. has 30 days to investigate the complaint. The complainant will be notified in writing of the cause to any planned extension to the 30-day rule.

If more information is needed to resolve the case, Help Central Inc. 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 Help Central Inc. 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.

Help Central Inc. Title VI Complaint Form

COMPLAINT FORM

Section I: Please write legibly		
1. Name:		
2. Address:		
3. Telephone:		3.a. Secondary Phone (Optional):
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
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 (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.		

Help Central Inc. Title VI Complaint Form, Page 2

COMPLAINT FORM

Section IV:		
14. Have you previously filed a Title VI complaint with Help Central Inc. ?	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:

Help Central Inc., Title VI Coordinator
326 Huss Dr. Suite 100
Chico, CA 95928

Titulo VI Procedimiento de Queja

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

Cualquier persona que cree que ha sido objeto de discriminación por motivos de raza, color, u origen nacional por Help Central Inc. puede presentar al Título VI su denuncia. Help Central Inc. investiga las quejas no mas de 180 días después del incidente. Help Central Inc. solo tramitara las quejas que están completas.

En un periodo de 10 días de haber recibido la demanda, Help Central Inc. la revisara para determinar si nuestra oficina tiene la jurisdicción. El autor de la queja, recibirá un acuse de recibo informándole al denunciante que será notificado por escrito si el caso de él/ella el será investigado por nuestra oficina. Help Central Inc. tiene 30 días para investigar la queja.

Si necesita mas información para resolver el caso, Help Central Inc. puede contactar al autor de la queja. El autor de la queja tiene 10 días de la fecha que recibió la carta para solicitar un investigador que sea asignado al caso.

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

Help Central Inc.

FORMA DE QUEJA

Seccion I: <i>Escribir en forma legible</i>		
1. Nombre:		
2. Direccion:		
3. Telefono:		3.a. Telefono secundario(<i>opcional</i>):
4. Direccion de correo electronico:		
5. Reuistos de forma accesible?	<input type="checkbox"/> Impresion grande	<input type="checkbox"/> Cinta de audio
	<input type="checkbox"/> TDD	<input type="checkbox"/> Otros
Seccion II:		
6. Esta presentando esta queja en su propio nombre?		Si No
*Si usted contesto "Si" to #6, vaya a la Seccion III.		
7. If you answered "no" to #6, what is the name of the person for whom you are filing this complaint? Name:		
8. Cual es su relacion con este individuo:		
9. Por favor, explique por que han 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 discriminacion que he experimentado fue basado en (<i>marqu todas las que correspondan</i>):		
<input type="checkbox"/> Raza	<input type="checkbox"/> Color	<input type="checkbox"/> Origin nacional
12. Fecha de supuesta discriminacion: (<i>mm/dd/aaaa</i>)		
13. Explica lo mas claramente posible lo que ocurrio y por que usted cree que son objeto discriminacion. Describir todas las personas que han participado. Incluir el nombre y la informacion de contacto de la(s) persona(s) que discrimina contra usted (si se conoce), asi como los nombres y la informacion de contacto de los testigos. Si se necesita mas espacio, por favor adjunte hojas adicionales de papel.		

Seccion IV:		
14. 14. Anteriormente ha presentado un Titulo VI denuncia con la Help Central Inc.	Si	No
Seccion V:		
15. Ha presentado esta queja con cualquier otro local, estado o federal, o con cualquier Federal o Estado?		
[] Si* [] No si la respuesta es si		
Marque todo lo que aplica		
[] Agencia Federal _____	[] Agencia Estatal _____	
[] Federal Tribunal _____	[] Agencia Local _____	
[] Tribunal Estatal _____		
16. Si usted contesto "si" a la posicion #15, proporcionan informacion acerca de una persona de contacto en la agencia/tribunal donde se presento la denuncia.		
Nombre:		
Titulo:		
Organismo:		
Direccion:		
Telefono:		Correo electronico:
Seccion VI:		
Nombre de organismo Transito denuncia es contra:		
Persona de contacto:		
Telefono:		

Please submit this form in person or mail this form to the address below:
 Help Central Inc., Title VI Coordinator
 326 Huss Dr. Suite 100
 Chico, CA 95928

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

Help Central Inc. has not been involved in any transportation-related Title VI investigations, lawsuits or complaints.

Help Central Inc. List of Investigations, Lawsuits and Complaints

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

Public Participation Plan

About Help Central Inc.

Help Central Inc. is a non-profit 501 c (3) organization and is the local agency authorized by the California Public Utilities Commission to provide comprehensive 2-1-1 telephone information and referral services in Butte and Glenn counties, California. 2-1-1 connects people in need with available health and human services by providing a centralized and easy to access 24 hour helpline. Help Central Inc. serves low income, elderly, disabled, and non-English speaking individuals and families as well as the general public through operation of the Butte-Glenn 2-1-1 helpline. Callers who dial 2-1-1 are connected to a trained community resource specialist who assesses needs, researches available services in a comprehensive community resource database, provides information, referrals, and offers service options. Callers are connected to food, shelter, housing, job training, transportation, health care, mental health services, child care, benefits programs, Veterans services, family support programs, crisis intervention services, and more. Trip planning and transportation assistance is offered through Help Central Inc.'s 2-1-1 helpline for Butte and Glenn County residents.

As a central hub of community resource information and assistance, Butte-Glenn 2-1-1 services are free, confidential and multilingual. A bilingual 2-1-1 specialist assists Spanish speakers who contact Butte-Glenn 2-1-1. A language line service is utilized to assist callers who speak other languages. The public can access Butte-Glenn 2-1-1 services through the telephone helpline, the web site and by text. Butte and Glenn County residents can dial 2-1-1, text 2-1-1, or contact ButteGlenn- 2-1-1 through the HelpCentral.org website. Internet users can also search the full Butte-Glenn 2-1-1 community resource database online. Vulnerable and at-risk callers receive follow up contacts from Butte-Glenn 2-1-1 specialists to provide further assistance and safety net services.

Help Central Inc. has dual membership in the national and state affiliate organizations of the Alliance of Information and Referral Services (AIRS). AIRS provides national standards, training, and quality assurance for 2-1-1 services nationwide. Help Central Inc. participates in the 2-1-1 California network for establishing statewide best practices and continuing education and professional development for 2-1-1 staff and organizations.

Help Central Inc. works closely in partnership with an extensive group of local government agencies and community based service providers to streamline access to services and strengthen outcomes for at risk residents in Butte and Glenn counties. A diverse cross section of these agencies participates in the Help Central Inc. steering committee which advises on coordination of services, policies, sustainability, and areas of mutual collaboration including outreach, publicity, and marketing to promote use of the 2-1-1 number to access services. Help Central Inc. maintains a marketing plan and conducts outreach activities and inreach processes to create meaningful opportunities for public engagement as outlined below.

Purposes of this Plan

Public participation is the process through which stakeholders can partake directly in agency decision-making, and express their concerns, desires, and values. It is the mission of this agency to connect people in need with supportive community services. 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

Help Central Inc. maintains a marketing and outreach plan to inform Butte County residents of 211 comprehensive information and referral services. The following is a summary of outreach efforts conducted by Help Central Inc. 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, local government agencies, and non-profit organizations within the community. This is in no way 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

Help Central Inc.'s general Board meetings minutes are open to the public (except for confidential personnel and financial information items) and announced on the agency's website.

Butte County Association of Governments (BCAG)

BCAG management staff work closely with Help Central Inc. and provide expert guidance on transit related issues for individuals with disabilities and transit services for the public including those communities with more concentrated LEP populations. Help Central's Executive Director serves on the BCAG Transportation Advisory Committee.

Butte County Office of Emergency Management

Help Central Inc. has worked in conjunction with the Butte County and Glenn County Office of Emergency Management in the development of strategies to improve access to critical public information during community emergencies or disasters. The counties' disaster response plans specifically address the needs of populations at risk including disabled, minority, and low-income individuals and families. This partnership is established through a Memorandum of Agreement with Help Central Inc. wherein this agency will provide critical community information regarding evacuation, shelter, and transportation during community emergencies and will provide ongoing assistance with real time disaster recovery information for the public.

Dia Del Campesino

Help Central Inc. has participated in the Dia Del Campesino event serving Butte and Glenn counties. This event is designed to reach out to the Latino community and to connect individuals and families to service providers and programs for health, mental health, housing, and transportation needs. The event typically attracts 200 guests and reaches Limited English Proficient individuals.

Hmong Cultural Center

Help Central Inc. works in partnership with the Hmong Cultural Center of Butte County to assist with providing community resource information and trip planning assistance for Hmong

residents of Butte County. Staff at the Hmong Cultural Center provide translation services for callers to Butte-Glenn 2-1-1.

Butte County Continuum of Care

Help Central Inc. maintains partnerships with local homeless shelters and transitional housing programs that offer services for low-income individuals with disabilities who are homeless. Butte 2-1-1 participates in mutual trainings with these agencies and provides information and referral services for their clients. Butte 2-1-1 is the primary point of entry for Coordinated Entry assessment and placement of unsheltered individuals and families on the County's permanent housing list.

Disability Action Center

Butte-Glenn 2-1-1 participates in mutual training with staff from the Disability Action Center (DAC) and coordinates response services with them during PG&E's PSPS public safety power shut off events. DAC provides information and assistance and case management for elderly and low income individuals with disabilities.

Help Central Inc. National 2-1-1 Day Outreach

Help Central Inc. conducts a full day of in person and virtual public outreach with our local partners to promote public awareness and utilization of the 2-1-1 helpline for access to services for low income, minority, and disabled populations. Help Central Inc. has hosted an Open House at the 2-1-1 Center to recognize and thank community partners. The Open House and National 2-1-1 Day are publicized with press releases to a number of various media outlets and also serve as a forum for public input. 2-1-1 Day outreach and the Open House typically reach 100-150 guests.

Community Outreach & Events

Help Central Inc. participates in 12-20 outreach events each year, most recently virtual due to COVID19 restrictions. These events target at risk low income families and children, low income elderly, low income tribal communities, homeless populations, Hispanic/Latino low income communities. Events include farmers markets, resource fairs, basic needs distribution events and drive-thrus, health fairs, library events, and virtual gatherings. Help Central Inc. also promotes services and access through our social media outlets and via monthly e-newsletters.

Community Agency Presentations

Help Central Inc. outreach staff present an overview of Butte-Glenn 2-1-1 services to an average of ten local agencies each year which serve low income populations in Butte and Glenn counties. Help Central Inc. participates in multiple community collaboratives that direct coordinated services toward low income residents, people with disabilities, elders, and households with children.

HelpCentral.org Website

Help Central Inc. maintains a free online searchable database of free and low cost services in Butte County on the Butte211.org we site. Notices and announcements of community resources and events and Butte-Glenn 2-1-1 services are posted on the agency's website. A web site user feedback survey is linked on the web site. Additional public input can be obtained by the Title VI Complaint Form, which is available as a download in English and Spanish.

Language Assistance Plan (LAP)

Overview

Help Central Inc. is the agency providing Butte-Glenn 211 telephone information and referral services for Butte and Glenn County residents and has developed this LAP Plan to help identify reasonable steps for providing language assistance to persons with limited English proficiency who wish to access services provided by Butte-Glenn 211. As defined in Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write or understand English. This plan outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, staff training that may be required, and how to notify LEP persons that assistance is available.

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

Purpose of the Language Assistance Plan

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

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

FTA Circular 4702.1B 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. Help Central Inc.'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 Help Central Inc.

As a sub-recipient of FTA 5310 Grant funding, Help Central Inc.'s focus is to provide a centralized 211 telephone assistance center including transit trip planning and mobility management services for residents of Butte and Glenn counties in California. There are no eligibility restrictions regarding who may call 2-1-1 to receive this assistance. As a first point of contact and centralized information hub for community resources, 211 is uniquely positioned to assist local callers with understanding travel and transit options to access critical health and human services, employment, child care, and personal health care appointments. As such, Help Central Inc does not offer direct transportation services to the general public other than through partnerships and involvement in a coordinated plan with other entities including the Butte County Association of Governments. Therefore, an analysis of public demographic data in Butte and Glenn counties does not represent actual populations served by this program but is offered for comparison purposes only.

There are three sources of data that most accurately represent LEP persons likely to be served by the program. The 2009-2013 American Community Survey, the Butte County Association of Governments (BCAG) Coordinated Public Transit-Human Services Transportation Plan for Butte County, and the Help Central Inc. Butte-Glenn 211 Contact Center Client Database. Help Central Inc. Butte-Glenn 211 collects demographic data from clients seeking information, referrals, and transportation assistance and maintains a database of client information. An historical analysis of this database in regard to language proficiency of all past and present clients will reflect actual proportions of LEP persons served.

American Community Survey

The U.S. Census Bureau 2009-2013 American Community Survey (ACS) Language Spoken at Home by the Ability to Speak English estimates that of the 208,297 Butte County residents over age 5, 14% speak a language other than English. Of those, 17,423 speak Spanish at home, 6,731 speak an Asian language at home, and all other non-English languages resulted in less than 2% of the population. Only 5.6% of these individuals speak English less than "very well". In Butte County, of those who speak English less than very well, 65% speak Spanish or Spanish Creole, 33% speak Asian and Pacific Island languages, and 2% speak other Indo-European languages.

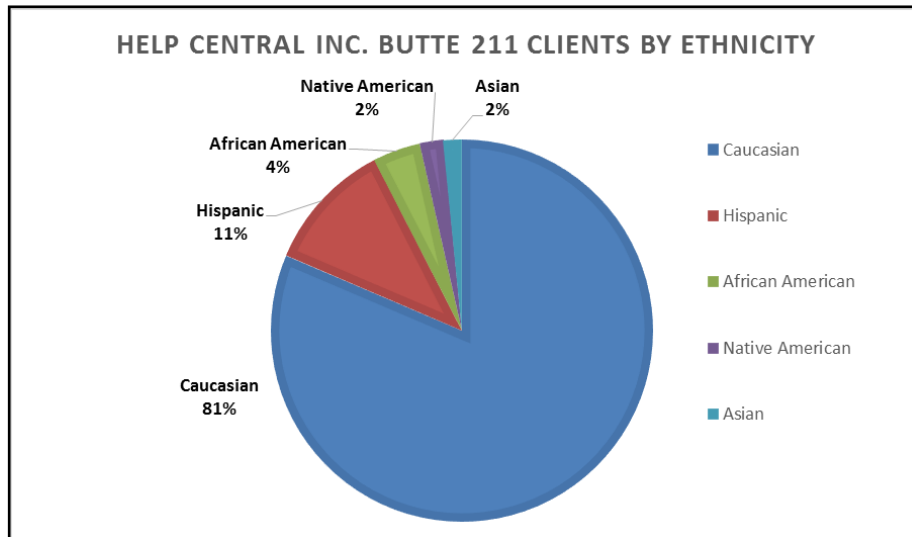
Butte County, California	Estimate	Percentage
Total:	208,297	100%
Speak only English		86.4%
Spanish	17,423	8.4%
Asian and Pacific Island (including Hmong)	6,731	3.2%
Speak English "very well"	196,632	94.4%
Speak English less than "very well".	11,665	5.6%

BCAG Coordinated Public Transit-Human Services Transportation Plan for Butte County

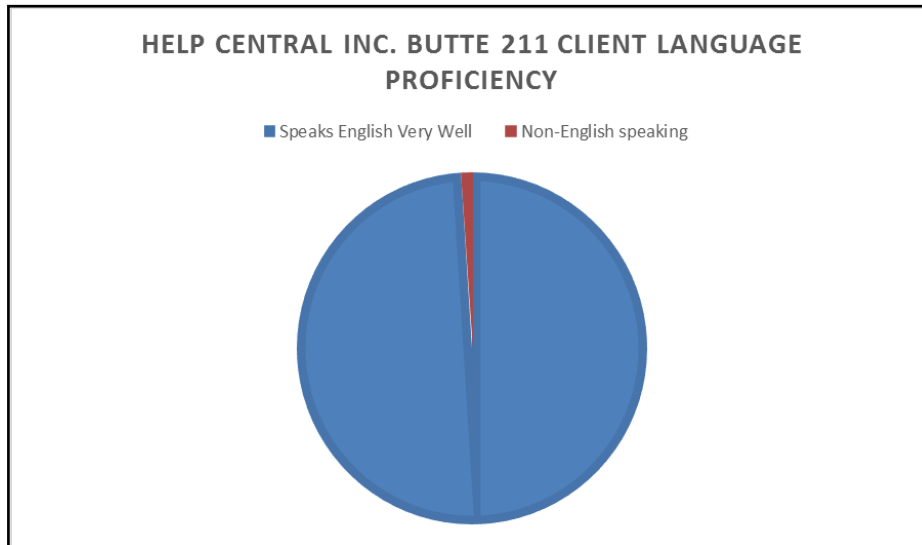
Help Central Inc.’s 211 information center coordinates public transit trip planning and guidance for callers. As such, the ridership of the B-Line, Butte County’s public transit system, helps determine geographic areas where LEP individuals may be identified and served. Ridership is addressed in the BCAG Community Coordinated Transportation Plan. BCAG identifies that the largest geographic concentration of LEP individuals in the Help Central Inc. and B-Line service area is Spanish. Two concentrated areas have been identified in Butte County. The City of Biggs has 10.3% of adult speakers who speak English less than very well. The City of Gridley has 10.2% of adult speakers who speak English less than very well. Services provided by B-Line that are most likely to encounter LEP individuals are the fixed route system which serves the general public and the demand-response (Dial-A-Ride) system which serves primarily senior and disabled persons. It is also likely that B-Line will encounter LEP individuals at the downtown Chico Transit Center where discount tickets are sold. As such, callers to Butte-Glenn 211 from these identified ridership areas are likely to represent a higher need for language assistance services.

Historical Analysis of LEP Persons Served by Help Central Inc. Butte-Glenn 211

A final source of data to be considered to determine the number of LEP persons likely to be served by this program is the Help Central Inc. Butte-Glenn 2-1-1 Center Client Database. Based on an analysis of all consumers served in the history of the program, the Help Central Inc. Butte-Glenn 211 program has served a total of 84,997 callers. Of that total, 11% are listed as Hispanic and 81% are listed as Caucasian. Other ethnicities were less than 5%.



In an analysis of the language proficiency of the Hispanic population served, 2% of clients spoke English "less than very well". In the Hmong population served, 1% clients spoke English "less than very well". 97% of the Butte-Glenn 211 callers spoke English "very well." Butte-Glenn 211 engages a live language translation service on calls from non-English speakers. There were no clients that were unserved by the program due to language barriers.



Factor 2: The frequency with which LEP persons come in contact with the Help Central Inc. Butte-Glenn 2-1-1 program, activity or service.

As indicated above, historically, contact with LEP consumers is 3% of all calls to Butte-Glenn 211. In addition, Help Central Inc. encounters LEP consumers at community outreach events as referenced above in the Summary of Outreach Events. Typically, Help Central Inc. is in contact with 30-50 additional LEP consumers annually through these outreach events.

Factor 3: The nature and importance of programs, activities or services provided by the Help Central Inc. Butte-Glenn 2-1-1 program to the LEP population.

The primary purpose of the Help Central Inc. Butte-Glenn 211 program is to connect people in need to essential health and human services, thereby improving their ability to overcome barriers to receiving help. By linking LEP consumers to concrete supports including food, shelter, job training, education, medical care, mental health care, and transportation services, 211 helps individuals develop resilience in responding to hardship experiences and helps prevent further crisis for individuals and families.

By providing a simple easy to remember three digit telephone number for accessing health and human services in Butte and Glenn counties, Butte-Glenn 211 offers a centralized hub for immediate information and assistance to LEP populations. Spanish speaking callers are assisted by a Spanish speaking 211 specialist who offers the full scope of 211 information and referral services including transit trip planning and transportation planning assistance. Other language callers are assisted seamlessly through the Language Line live translation service.

211 services, in addition to being multilingual, are confidential and non-judgmental, helping to build trust and reliance with LEP callers and establish a “pathway to services” in their local communities. 211 conducts follow up calls with vulnerable callers including LEP callers to determine if services were successfully accessed and to offer additional assistance if needed.

Factor 4: The resources available to the Help Central Inc. Butte-Glenn 2-1-1 program and overall cost to provide LEP assistance.

Help Central Inc. is a member of the Alliance of Information and Referral Services (AIRS), and is guided by the quality assurance standards established by AIRS, including those related to serving LEP clients. These standards include having bilingual or multilingual 211 call specialists on staff, use of a live Language Line translation service for seamless interpretation during 211 calls, staff training for caller assessment, cultural sensitivity, and identifying special vulnerabilities associated with LEP consumers. The Butte-Glenn 211 client software program and telephony systems are programmed and customized to capture local LEP client data and to maximize access to 211 services for LEP populations. The 211 community resource database and web site includes a translation option for Spanish literate users.

The Help Central Inc. Butte-Glenn 211 operating budget does not have a specific line item for providing language access and outreach. Outreach expenses as they relate to LEP populations are included in the overall program marketing costs, \$2000 per year for all print materials and advertising. Subscription to the Language Line is free through Help Central Inc.'s membership in the Alliance of Information and Referral Services (AIRS). There is no cost for our partnership agreement for translation services with the Hmong Cultural Center. Annual wages for a full-time Spanish speaking 211 Specialist are \$35,500 per year including benefits (this cost represents services performed for both LEP and non-LEP consumers). The language translation option on the Butte211.org web site is included in the annual 211 software licensing and web hosting cost, \$4500 per year.

Language Assistance Implementation Plan Help Central Inc.

Methodologies

Identifying LEP Individuals

As evidenced by the Four Factor Analysis, only 3% of callers to Butte-Glenn 2-1-1 are “true” LEP consumers. The predominant minority language in the counties is Spanish and higher concentrations of Spanish speaking individuals are located in certain communities within the service region. There are no dedicated marketing funds specifically earmarked for LEP outreach, however the outreach and marketing plan for Help Central Inc. includes activities and efforts to target these LEP populations and communities. Help Central Inc. works with the Glenn County Department of Health and Human Services to communicate Spanish language outreach to LEP residents in Glenn County. The Butte-Glenn 211 telephone IVR menu is programmed to identify LEP callers and to create an immediate connection to a Spanish speaking 211 specialist or for language line translation assistance. Help Central Inc. offers multiple communication platforms for LEP consumers, via 211 telephone assistance, the online searchable community resource database, and through in person contact at community outreach events.

Providing Services

Help Central Inc. implements these best practices to assure quality services are provided to LEP consumers:

- employs a full-time Spanish speaking 211 Call Specialist
- provides recorded telephone instructions and information about 211 services in Spanish when callers dial 211

- provides an automated IVR menu enabling Spanish speaking callers to reach the 211 Spanish-speaking specialist directly
- utilizes the Spanish speaking 211 Specialist to participate in community outreach events that serve LEP populations as described above in the Community Outreach Summary
- subscribes to the Language Line translation service to allow live on-call translation services in more than 250 languages to assist LEP consumers calling Butte-Glenn 211
- maintains a partnership with the Hmong Cultural Center of Butte County to provide three-way live call translation services for callers to 211 who speak only Hmong
- publishes fliers for 211 services in Spanish that are distributed widely to agencies and service providers who work with LEP populations, at outreach events targeted to LEP populations, and in retail, office, and government building outlets in communities with concentrated LEP populations
- provides a Spanish translation option for LEP consumers when searching the online public database of health and human services on the Butte211.org web site

Documents that are offered in Spanish include:

- Outreach fliers and posters promoting 211 services (digital and print)
- Title VI Notice to the Public
- Title VI Complaint Form
- Title VI Complaint Procedures
- Agency website Title VI information

Communicating Availability of Language Assistance

The Butte-Glenn 211 telephone IVR is programmed with introductory messages in Spanish and directs callers through a menu of options including direct connection to Spanish language assistance. Butte-Glenn 211 staff can immediately access the Language Line translation service during a live call with an LEP individual. Outreach fliers, other marketing materials, and web site information about 211 services are distributed in Spanish. Outreach materials specifically state that Butte-Glenn 211 services are multi-lingual. Presentations by Butte-Glenn 211 to the public and to community service providers include information about 211 multilingual services. Staff at the Hmong Cultural Center of Butte County are trained to contact 211 on behalf of LEP clients and to establish a three way live call with 211 specialists.

Dissemination of the Help Central Inc. LEP Plan

A link to the Help Central Inc. LEP Plan and the Title VI Procedures is included on the website at www.Butte211.org. Any person or agency with internet access will be able to access and download the plan from the Help Central Inc. Butte-Glenn 211 website. Alternatively, any person or agency may request a copy of the plan via telephone, mail, or in person and shall be provided a copy of the plan at no cost. LEP individuals may request copies of the plan in translation which Help Central Inc. will provide, if feasible.

Monitoring

Help Central Inc. will update the LEP as required. Updates will include the following:

- The number of documented LEP person contacts encountered annually
- How the needs of LEP persons have been addressed
- Determination of the current LEP population in the service area
- Determination as to whether the need for translation services has changed
- Determine whether local language assistance programs have been effective and sufficient to meet the need
- Determine whether Help Central Inc.'s financial resources are sufficient to fund language assistance resources needed
- Determine whether Help Central Inc. has fully complied with the goals of this LEP Plan
- Determine whether complaints have been received concerning Help Central Inc.'s failure to meet the needs of LEP individuals
- Maintain a Title VI complaint log, including LEP to determine issues and basis of complaints

Help Central Inc. will utilize an Annual Report to analyze for trends and patterns that may indicate a need for additional services. This report includes ethnicity and languages of clients served and can be used as a guide to determine the need for additional translation services, outreach efforts, and response to unmet needs.

Employee Training

Help Central Inc. staff attend annual professional training workshops provided by the California Alliance of Information and Referral Services (CAIRS), the state affiliate of AIRS. This training certifies that 211 staff receives professional development according to AIRS standards and that 211 organizations utilize AIRS best practices for service delivery quality assurance including services for LEP clients. Help Central Inc. staff attend at least quarterly In-Service trainings that include customer service, and/or cultural sensitivity, and/or outreach methods for special populations including LEP populations. Annual training is provided to 211 staff on use of the Language Line services or on an as-needed basis for refresher training.

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, Help Central Inc. serves individuals by oral communication through the 211 telephone helpline. Services in Spanish meets the threshold for Safe Harbor provisions. Translation is offered through a bilingual specialist or the Language Line whenever needed to help increase fair and equitable access to quality services. Where written documents are produced by Help Central Inc. for public use, these documents are provided or available upon request with written translation in Spanish for limited English speaking individuals.

Membership of Non-Elected Committees and Councils

Help Central Inc. does not have a non-elected transit related advisory council at this time.

Title VI Equity Analysis

Help Central Inc. does not have transit related facilities.

TITLE VI COMPLIANCE STATEMENT

Help Central Inc. desires to comply with Title VI of the Civil Rights Act of 1964, including provisions detailed in U.S. Department of Transportation’s FTA Circular 4702.1B, “Title VI Requirement and Guidelines for Federal Transit Administration Recipients.”

The Chief Executive Officer is authorized to implement the components of the plan in order to meet Federal requirements; and the Chief Executive Officer is authorized to implement policies that may be necessary to comply with subsequent revisions or interpretations to the Civil Rights Act.

SIGNED this 13th day of April, 2021



**Signatory
Executive Director
Help Central Inc.**