



**Humboldt Senior Resource Center's
Adult Day Health & Alzheimer's Services and Redwood Coast PACE
Title VI Program**

Updated: January 1, 2026

Humboldt Senior Resource Center

Adult Day Health & Alzheimer's Services and Redwood Coast PACE Title VI & LEP Plan

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INTRODUCTION

Humboldt Senior Resource Center (HSRC) is committed to ensuring all individuals have equal access to programs, services, and activities, regardless of race, color, national origin, or limited ability to speak, read, write, or understand English. Title VI of the Civil Rights Act of 1964, a federal statute, provides that 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 financial assistance. In addition, Executive Order 13166 further requires recipients and sub-recipients of federal funds to take reasonable steps to address the needs of individuals who have limited-English proficiency (LEP) to provide meaningful access and ensure no discrimination occurs based upon national origin.

This document was prepared by HSRC to comply with Title VI of the Civil Rights Act of 1964, including new provisions detailed in the U.S. Department of Transportation's FTA Circular 4702.1B, "Title VI Requirement and Guidelines for Federal Transit Administration recipients."

Program Objectives

Humboldt Senior Resource Center's Title VI Program goals are to:

- Ensure that the level and quality of our community service transportation is provided in a nondiscriminatory manner;
- Promote full and fair participation in community service transportation decision-making without regard to race, color, or national origin;
- Ensure meaningful access to community service transit-related programs and activities for persons with limited English proficiency.
- The Humboldt Senior Resource Center's mission is that seniors and their caregivers in Humboldt County will have a high quality of life with health, dignity, and self-determination in a community of respect and tolerance.

TITLE VI NOTICE TO THE PUBLIC

HSRC notifies the public of the rights under Title VI. The notice is provided in English and Spanish.

Notifying the Public of Rights Under Title VI

HSRC

- HSRC 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 HSRC.
- For more information on HSRC's civil rights program, and the procedures to file a complaint, contact 707-443-9747, or visit our administrative office at 1910 California St, Eureka, CA 95501. For more information, visit www.humsenior.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 707-443-9747.

LOCATIONS WHERE TITLE VI NOTICE IS POSTED

HSRC's Title VI notice to the public is currently posted at the following locations:

Location Name	Address	City
HSRC Eureka	1910 California St	Eureka
Adult Day Health Eureka	1901 California St, Building A	Eureka
Redwood Coast PACE Eureka	1901 California St, Building B	Eureka
Redwood Coast PACE Arcata	3798 Janes Rd	Arcata
HSRC Fortuna	3200 Newburg Rd	Fortuna
Interior of Buses and Vans	1901 California St	Eureka
Interior of Buses and Vans	3200 Newburg Rd	Fortuna
Interior of Buses and Vans	3798 Janes Rd	Arcata

Title VI notice and program information is also provided on HSRC's website at www.humsenior.org.

TITLE VI COMPLIANT PROCEDURES

As a recipient of federal dollars, HSRC 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. HSRC has in place a Title VI Complain 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.

Filing a Complaint with the Humboldt Senior Resource Center

The preferred method of filing a complaint is to file your complaint in writing using the Title VI complaint form, and sending it to:

Title VI Administrator
Humboldt Senior Resource Center
1910 California Street
Eureka, California 95501

A complaint form is available in hard copy at the Humboldt Senior Resource Center or may be downloaded from www.humsenior.org. Such complaints must be filed within 180 calendar days after the date the discrimination occurred.

The Complaint Process

Upon receipt of the complaint, the Title VI Administrator will record the complaint in the Title VI Complaints, Investigations, and Lawsuit Log. This Log includes the date of investigation, lawsuit, or complaint; summary of the allegation(s); the status of the investigation, lawsuit or complaint; and actions taken by recipient or sub-recipient in response to complaint.

Should a complaint be filed with the Humboldt Senior Resource Center and an external agency simultaneously, the external complaint shall supersede the Humboldt Senior Resource Center complaint and Humboldt Senior Resource Center's complaint procedures will be suspended pending the external agency's findings.

If filed with the Humboldt Senior Resource Center, the Title VI Administrator will begin assessment or investigation of the complaint within fifteen (15) working days of receiving the complaint. Based upon all of the information received, the Title VI Administrator will prepare a draft written response, subject to review by the Humboldt Senior Resource Center. If more time is required, the Administrator shall notify the complainant of the estimated time frame for completing the review, not to exceed (60) calendar days of the receipt of the formal complaint.

If more information is needed to resolve the case, HSRC 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, HSRC can administratively close the complaint.

A case can be administratively closed 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.

How to File a Complaint with the Federal Transit Administration

A person may also file a complaint directly with the Federal Transit Administration at:

**Federal Transit Administration Office of Civil Rights
Attention: Title VI Program Coordinator
East Building, 5th Floor – TCR
1200 New Jersey Ave., SE
Washington, DC 20590**

The complaint form may be downloaded from the FTA's website.

Go to <http://www.fta.dot.gov/civilrights/title6/civilrights5104.html> for more information.

TITLE VI COMPLAINT FORM

Before filling out this form, please read the Humboldt Senior Resource Center's Title VI Complaint Procedures located on the previous page, posted online at www.humsenior.org, or available at our office at 1910 California Street, Eureka.

The following information is necessary to assist us in processing your complaint. If you require assistance in completing this form, please call us at the phone number listed above. Complaints must be filed within 180 calendar days after the date the alleged discrimination occurred.

Complainant's Name:		
Street Address:		
City:	State:	Zip Code:
Telephone Number Home:	Other:	

Were you discriminated against because of:

Race

National Origin

Color

Date of Alleged Incident:

Time of Incident:

Person discriminated against (if someone other than complainant):

Name:		
Address:		
City:	State:	Zip Code:

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 and provide name of agency and contact information:

	Federal Agency:	Contact:
Telephone # For Contact:		Email:
	Federal Court:	Contact:
Telephone # For Contact:		Email:
	State Agency:	Contact:
Telephone # For Contact:		Email:
	State Court:	Contact:
Telephone # For Contact:		Email:
	Local Agency:	Contact:
Telephone # For Contact:		Email:
	Other:	Contact:
Telephone # For Contact:		Email:

Have you filed a lawsuit regarding this complaint: Yes No

Note: If litigation is pending regarding the same issues, we defer to the decision of the court.

In your own words, describe the alleged discrimination. Explain what happened and whom you believe was responsible. You should include specific details such as names, dates, times, route numbers, witnesses, and any other information that would assist us in our investigation of the allegations. Please provide any other documentation that is relevant to this complaint.

Please sign below. You may attach any written materials or other information that you think is relevant to your complaint.

Signature:	Date:
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Mail this form to:

Title VI Administrator
Humboldt Senior Resource Center 1910 California Street
Eureka, California 95501

Date Received:	By Whom:
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HUMBOLDT SENIOR RESOURCE CENTER

LIST OF TRANSIT-RELATED TITLE VI INVESTIGATIONS, COMPLAINTS, AND LAWSUITS

	Date (Month, Day, Year)	Summary (include basis of complaint: race, color, or national origin)	Status	Action (s) Taken
Investigations				
1.	None			
2.				
Lawsuits				
1.	None			
2.				
Complaints				
1.	None			
2.				

NOTE: This list shall be included in the Title VI Program submitted to FTA every three years.

PUBLIC PARTICIPATION PLAN

Agency Overview

The Humboldt Senior Resource Center (HSRC) has successfully provided services to Humboldt County seniors for more than 45 years. At the heart of HSRC's success is a commitment to a global vision that states: "Seniors and their caregivers in Humboldt County will have a life with dignity, health and self-determination in a community of respect and tolerance." This vision guides the board of directors, staff, and volunteers."

As a 501(c)3 non-profit organization, HSRC is governed by a board of directors consisting of 9 to 12 volunteers from the community. As a group, the board members bring experience and expertise in non-profit management, community development, healthcare, education, finance and legal.

Mission Statement

Older adults in Humboldt County will experience a high quality of life – defined by dignity, health, and self-determination – within a community that values respect, inclusion, and compassion at a level that justifies the resources expended.

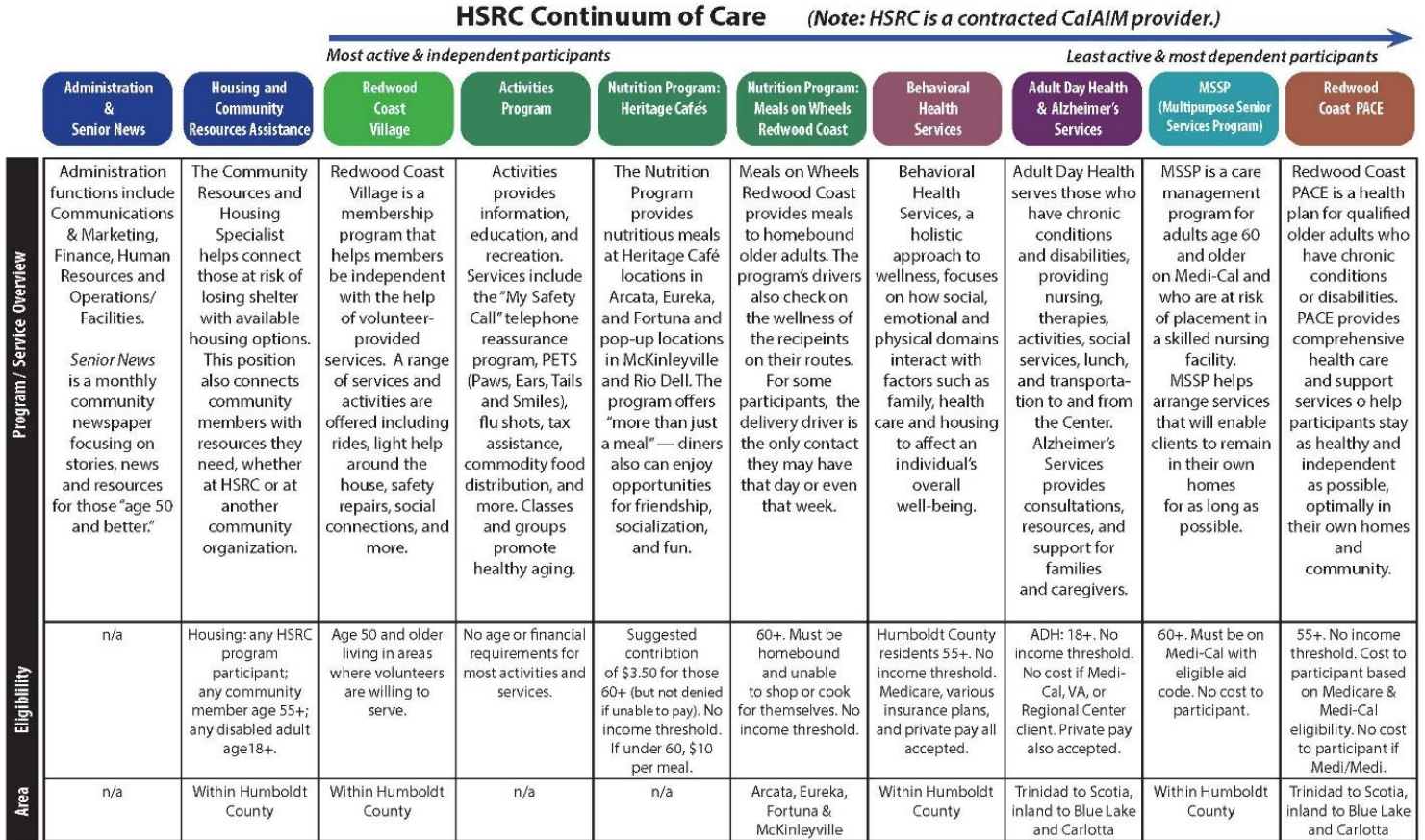
Vision Statement

Humboldt Senior Resource Center is dedicated to meeting the expanding and evolving needs of an aging population. We provide a wide range of services, resources, education, and recreational opportunities that support the well-being of older adults in Humboldt County. We envision a healthy, compassionate community that values intergenerational connection, honors the experience and wisdom of older adults, and embraces aging with awareness, sensitivity, and respect. In addition, the members have knowledge of Humboldt County and an understanding of the area's cultural and ethnic diversity. The board provides policy direction to the Chief Executive Officer (CEO)

Agency Programs

HSRC is dedicated to meeting the expanding and evolving needs of an aging population. We provide a wide range of services, resources, education, and recreational opportunities that support the well-being of older adults in Humboldt County. These services are part of our Continuum of Care Model (Exhibit A).

Exhibit A: HSRC Continuum of Care Model



HSRC's participant population is frail, disabled, and for the most part elderly, as well as adults who are disabled and dependent on others. Many are diagnosed with dementia or a mental illness and are not able to use public transportation independently. Some of the participants are in wheelchairs. Many need attendant care and hands-on assistance.

Transportation services are an essential and required component of HSRC's Adult Day Health & Alzheimer's Services and Redwood Coast PACE programs. We serve a large geographic area - about 450 square miles - reaching from north of Trinidad down to Scotia in the Eel River Valley and extending east to Blue Lake via Highway 299 and Carlotta on Route 36. As of the end of the 2025 calendar year, HSRC had 21 vehicles in operation 5 days a week.

Adult Day Health & Alzheimer's Services

Adult Day Health & Alzheimer's Services (hereafter referred to "ADH") is a therapeutic day program that provides affordable, quality care in a safe and inviting setting to enhance the independence and quality of life for adults who have physical or mental disabilities. This program is designed to provide respite and support for family caregivers in addition to the direct care provided for our participants.

With locations in Eureka and Fortuna, California, HSRC provides transport services to participants to and from their homes and our therapeutic Centers. In 2025, ADH served 84 participants.

Redwood Coast PACE

Redwood Coast PACE (hereafter referred to “PACE”) is a comprehensive health plan and healthcare provider for older adults with chronic conditions and/or disabilities. The program provides wraparound support and social services to participants and the family. The goal of PACE is to help participants stay as healthy and independent as possible, so they are able to remain in their own homes and community.

HSRC has three PACE centers located in Arcata, Eureka, and Fortuna, California. HSRC is required by the terms of the PACE contract to provide participants with transportation to and from their homes to the PACE center, and to medical appointments, seven days a week, as needed. Transportation services cannot be outsourced to other agencies.

In 2025, PACE served 424 participants.

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. 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

Due to a very small local LEP population, HSRC does not have a formal outreach procedure, as of 2025. However, when and if the need arises for LEP outreach, HSRC will consider the following options.

- HSRC continually strives to inform the community about its services and programs – including Redwood Coast PACE and Adult Day Health & Alzheimer’s Services – via staff outreach, brochures and other marketing materials, a website (www.humsenior.org), and the monthly Senior News publication.

LANGUAGE ASSISTANCE PLAN

Overview

The first section in this document describes the purpose of the Language Assistance Plan (LAP). The second section in this document provides the four-factor Limited English Proficient (LEP) analysis (as outlined by the Department of Transportation [DOT] used to identify LEP needs and assistance measures). The four-factor LEP analysis includes:

- **Factor 1:** The number or proportion of LEP persons in the service area who may be served or are likely to encounter the Life Skills Learning Center program, activity or service.
- **Factor 2:** The frequency with which LEP persons come in contact with the Life Skills Learning Center program, activity or service.
- **Factor 3:** The nature and importance of programs, activities or services provided by Life Skills Learning Center to the LEP population.
- **Factor 4:** The resources available to HSRC and overall cost to provide LEP assistance.

The third and final section discusses the implementation of the LAP, 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

The LAP outlines the policies, procedures, and actions that HSRC will implement to identify language assistance needs and ensure that participants and members of the public are not excluded from participation or denied services on the basis of national origin or language ability. This Plan also establishes standards for providing timely and appropriate language assistance – both oral interpretation and written translation – to individuals who need such services.

Through this Plan, HSRC affirms its commitment to equitable access, cultural responsiveness, and effective communication. By removing language barriers and ensuring compliance with federal nondiscrimination requirements, we support our mission to provide high-quality, inclusive services to our participants and members of the public.

Local demographic data revealed there was no need to provide additional language assistance at this time. However, the Humboldt Senior Resource Center keeps records of requests for language assistance and will continue to analyze the need.

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 services. 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. HSRC's 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 HSRC.

Humboldt County has a relatively low overall LEP rate compared to other areas in California. Roughly 3.5 % of the county residents speak a language other than English at home.

HSRC has reviewed the 2024 U.S. Census Bureau ACS Data for individuals 65 years and over and determined that of the 28,021 persons in Humboldt County, 7% speak a language other than English. Of those 7% or 1,959 non-English speaking individuals; 1040 persons (53.1%) have Limited English Proficiency; that is, they speak English "not well" or "not at all." This is only 3.7% of the overall 65 + population in the service area. Of those persons with Limited English proficiency, 44 speak Spanish, 276 speak Indo-European, 444 speak Asian or Pacific Islander Languages, and 0 speak other foreign languages.

HSRC holds a unique position in regard to meeting the Title VI requirements. As a sub-recipient of FTA 5310 Grant funding, the agency's focus is primarily on transporting adults with disabilities and older adults where current public transit options are insufficient or do not exist. Eligible program participants or "riders" must be an enrolled participant of the Redwood Coast PACE or Adult Day Health program. As such, HSRC 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 Humboldt County does not represent actual populations served by this program but is offered for informational purposes only.

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

LEP persons rarely come in contact with the Humboldt Senior Resource Center. This is primarily because of the regional racial and ethnic demographics. Based on a survey of positions that would frequently be through to encounter LEP individuals, there have been 5 requests for interpreters and translation services in the past year.

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

HSRC's mission is to assist seniors and caregivers in Humboldt County to have a high quality of life, with health, dignity, and self-determination in a community of respect and tolerance.

The Adult Day Health program provides the individually tailored therapies participants need to help avoid or delay being institutionalized in a skilled nursing or psychiatric facility.

Redwood Coast Pace offers effective and affordable healthcare to frail seniors whose only other option might previously have been to enter a skilled nursing facility, round the clock skilled nursing care at home, or leave the area. The cost of services is covered by Medi-Cal, Medicare, and private payment. The participant's share of cost, if any, depends on their Medi-Cal and Medicare eligibility and coverage.

Factor 4: The resources available to the Humboldt Senior Resource Center and overall cost to provide LEP assistance.

HSRC's website provides an online translation tool that will refresh the web page into Spanish. HSRC uses Language Line Solutions for interpretation services. For persons who are hearing impaired or disabled, HSRC directs anyone who needs service to use the free California Relay Service (711). As needed, for example during the enrollment process, HSRC may engage the service of a local translator who attends meetings in person. The cost of these services is negligible.

LANGUAGE ASSISTANCE IMPLEMENTATION PLAN

Language assistance can include interpretation, which means oral or spoken transfer of a message from one language into another language and/or translation, which means the written transfer of a message from one language into another language. Which may include:

- An LEP person interested in becoming a participant is almost always accompanied by a family member or friend who provides language assistance. If not, staff and volunteers will refer the person to the Enrollment Team, who will engage the appropriate interpretation service.
- HSRC enrollment or program staff will note the need for language assistance on the in-take form, and program staff will report other encounters in the monthly report. Using monthly reports from the Program Managers, the Title VI Administrator will analyze annually the number of LEP encounters to evaluate HSRC's interpretation/translation needs and services.
- HSRC will post the Title VI Policy Statement and the Complaint Procedures on the agency website, www.humsenior.org, and post the availability of interpretation or translation services free of charge

in the locations where staff and volunteers are most likely to encounter LEP persons (notices in English only).

- The HSRC website home page offers a translation tool that supports more than 100 languages. We inform the public on our website that further translation service is available.
- HSRC staff most likely to encounter LEP persons are trained on using these resources.

LANGUAGE ASSISTANCE MEASURES

HSRC is committed to making its services and programs available to LEP persons and to continue with the following practices:

HSRC employees will take reasonable steps to provide the opportunity for meaningful access to LEP clients who have difficulty communicating English.

1. The following resources will be available to accommodate LEP persons:
 - a. HSRC will post notice of Title VI Policy Statement and Complaint Procedures on the agency website, www.humsenior.org, and post the availability of interpretation or translation services free of charge in the locations where staff and volunteers are most likely to encounter LEP persons (notices in English only).
 - b. Copies of the Policy Statement and Complaint Procedures can also be obtained at 1910 and 1901-B California Street, Eureka, California 95501.
 - c. Interpretation/translation services are available on the web site, by telephone, and, as needed, in person.

LANGUAGE ASSISTANCE TOOLS AND RESOURCES

Interpretation Services through Language Line Solutions

HSRC uses Language Line Solutions for interpretive services in 200 languages. This service is free to the caller with limited language proficiency and available during HSRC business hours.

When a staff member gets a call from someone who needs translation services, the staff member will follow these instructions.

1. Dial **1-888-808-9008**
2. Enter our 8-digit PIN Number **546-713-06** at the prompt, then clearly state the name of the language you need assistance with.
3. You'll be asked if you need Language Line to dial a third-party member for you (either international or domestic at no additional charge). Say "yes" to be connected with an agent who will dial the number for you. Say "no" if you want to go straight to a professional interpreter.

When a caller directly telephones the Language Line phone number, Language Line will connect with HSRC and ask for HSRC's PIN number before translating the caller's conversation.

California Relay Service for the Deaf and Disabled

For help communicating with people who have limitations in hearing or speaking, a specially trained Communications Assistant (CA) can relay telephone conversations for all of your calls. This is a free service to aid Californians who are deaf or disabled and available during HSRC business hours.

Dial 711 to reach the California Relay Service (CRS). Dialing 711 is for everyone, not just those who have difficulty hearing on a standard telephone. Friends, family, and business contacts can dial 711 for relay calls, too.

If the person prefers having the calls immediately answered in their mode of communication, they should dial one of the toll-free modality- and language-specific numbers below. The call will be routed to the California Relay Service provider.

Type of Call	Language	Toll-free 800 Number
TTY, Voice, VCO, HCO, ASCII	English	1-800-855-7100
STS	English	1-800-854-7784
VA STS	English	1-800-855-7400
TTY, Voice, VCO, HCO, ASCII, STS	Spanish	1-800-855-7200

Federal regulations specify very strict confidentiality requirements for CAs of all relay services. No part of the conversation that takes place between callers is revealed or recorded in written, verbal, or any other form. CRS CAs do not participate in the conversation and acquire no benefit from information relayed.

More information on California Relay Service can be found at: <https://caconnect.org/relay/> or by calling 1-800-806-1191.

Staff Training

The staff most likely to encounter LEP individuals who participate, or are interested in participating in the programs, and their family members or caregivers have been identified as:

- Reception Staff
- Enrollment Staff
- Scheduling Staff
- Transportation Staff
- Staff who participate in outreach activities

These interactions may take place on the phone or in person, in transit, at home, at within programs, the clinic, and the lobbies.

Because any HSRC staff member may encounter LEP individuals, instructions are available to them. The instructions include:

- Information on the Title VI Policy and LEP responsibilities.
- Description of language assistance services offered to the public.
- How to handle a potential Title VI/LEP complaint.
- Documentation of language assistance requests and complaints.

Monitoring

HSRC will review and update the LEP Plan every three years, at a minimum, or as requested when data from the Census is available that demonstrates higher concentrations of LEP individuals are present in the HSRC service area. Updates will include the following:

- How the needs of LEP persons have been addressed.
- Determination of the current LEP population in the service area.
- Determination whether the need for translation services has changed.
- The Title VI complaint log.

SOCIAL SERVICES TECHNICAL ADVISORY COMMITTEE (SSTAC)

HSRC participates in the SSTAC, which advises the Humboldt County Association of Governments (HCAOG) on public transportation needs in the region. The SSTAC is required to have a minimum of nine members representing the transit community, including persons with disabilities, senior transit users, social service provider representatives, low-income representatives, and representatives of the Consolidated Transportation Service Agency (CTSA). The HCAOG Board has appointed additional members to the SSTAC in accordance with PUC 99238(b).

When seats become available on the SSTAC, HCAOG advertises in the local newspapers throughout the region and a member is selected through HCAOG Board approval. Meetings are held quarterly.

HSRC's Transportation Program Manager serves as a member of the SSTAC board, representing providers of social services for seniors.

SSTAC Board Members, as of December 2025:

Board Members	Organization
Richard Johnson - Chair	Public Representative: Advocate for Senior Transit Users
Saskia Rymer-Burnett – Vice Chair	CalTrans
Peggy Martinez	Public Representative: Advocate for People with Disabilities
Orlando Payne	Humboldt Senior Resource Center
Susan Cleverdon	Area 1 Agency on Aging
Juliannah Harris	Tri-County Independent Living
Catherine Sundquist	CAE Transport, Inc.
Isa Pritting	North Coast Children's Services
Greg Pratt	Humboldt Transit Authority

Cody Ferreira	Humboldt Transit Authority
Charlotte Merkel	County of Humboldt
Kaylyn Stainbrook	City of Fortuna
Carol Mone	Coalition for Responsible Transportation Priorities
Samuel Martinez	Yurok Tribe
Jaison Chand	Public Representative
Krista Paddock	Cal Poly Humboldt

TITLE VI EQUITY ANALYSIS

Humboldt Senior Resource Center does not have transit-related facilities.

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."