



TITLE VI PROGRAM

Updated March 1, 2026

VistAbility
1340 Arnold Drive, Suite 127
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925-370-1818
www.VistAbility.org

Introduction

This document was prepared by VistAbility and approved by its Board of Directors 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."

VistAbility is the largest organization serving people with intellectual and other developmental disabilities in the East Bay. As you will see, VistAbility employees and program participants are of diverse cultures, very similar to the demographics of Contra Costa County. While 73% of the persons served at least understand English, an additional 18% are non-verbal, due to their disabilities. For individuals served that are non-verbal, communication alternatives (yes/no symbols, Picture Exchange Communication systems) are taught, but are very basic in nature (i.e., not conversational).

In addition, 4% of our clientele at least understand Southeast Asian languages combined (Cantonese, Vietnamese, Laotian and Cambodian); while 2% at least understand Spanish. All other languages of persons served each account for less than 1% of the total.

No Limited English Proficient (LEP) group served by VistAbility meets the Safe Harbor Provision's 5% eligibility, as stated in the Federal Transit Authority Circular 4702.1B.

Due to the support needs of the persons served, VistAbility provides door-through-door transportation services to and from the day programs to approximately 50 individuals on a daily basis. In addition, the agency transports approximately 250 participants to and from daily activities as part of the day program services. VistAbility further collaborates with other non-profit agencies and special event organizers to provide accessible vehicles and/or drivers outside of our regular day program hours (i.e., evenings and weekends). Transportation services are not provided to the general public.

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Attachments:

VistAbility Board Resolution

VistAbility's Title VI Notice to the Public (English Version)

Notifying the Public of Rights Under Title VI

VistAbility

- VistAbility 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 VistAbility.
- For more information on the agency's civil rights program, and the procedures to file a complaint, contact 925-370-1818 or visit our Administrative Office at 1340 Arnold Drive, Suite 127, Martinez, CA 94553. For online information, visit our website at www.VistAbility.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 925-370-1818.

VistAbility's Title VI Notice to the Public (Spanish Version)

Notificar al Público de los Derechos Bajo el Título VI

VistAbility

- VistAbility 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 VistAbility.
- Para obtener más información sobre el programa derechos civiles capaz de industrias y el procedimientos para presentar una queja, llame al 925-370-1818, o visite nuestra Oficina Administrativa en 1340 Arnold Drive, Martinez, CA, 94553. Para más información, visite www.VistAbility.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 925-370-1818

VistAbility Title VI Notice to the Public

有關六號權益法規的公告

VistAbility

- 根據六號權益法規及公民權利法案規定, VistAbility 屬下所有訓練中心及服務部門所提供的服務不會因服務對象的種族, 膚色及國籍而有所不同. 若任何人認為他/她受六號權益法規保障之權益遭到非法歧視而受迫害, 都可向 VistAbility 提出投訴
- 若想得知VistAbility有關公民權益規章及投訴程序的詳情, 請致電 925-370-1818或是親自到本中心行政部門洽詢, 地址是:
1340 Arnold Drive, Suite 127, Martinez, CA 94553
或是上網查詢, 網址是www.VistAbility.org
- 投訴人也可以直接向聯邦運輸行政部門提出書面投訴. 投訴書請寄至: 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
- 如果您需要本資料的其他語文版本, 請致電 925-370-1818

(Cantonese Version)

List of Locations Where Title VI Notice Is Posted

VistAbility's Title VI Notice to the Public is posted at the following locations:

Location Name	Address
VistAbility Administration Office: Lobby and Conference Room	1340 Arnold Avenue, Suite 127 Martinez, CA 94553
Inroads and CAP-Antioch: Lobby, Conference Room and Vehicles	2157 Country Hills Drive Antioch, CA 94509
CAP-Concord: Lobby, Conference Room and Vehicles	4615 Clayton Road Concord, CA 94521
George Miller Center-Concord: Lobby, Conference Room and Vehicles	3020 Grant Street Concord, CA 94520
George Miller Center-Richmond: Lobby, Conference Room and Vehicles	2801 Robert Miller Drive Richmond, CA 94806
Asian Family Resource Center: Lobby, Conference Room and Vehicles	12240 San Pablo Avenue Richmond, CA 94805
Access: Lobby, Conference Room and Vehicles	33424 Alvarado Niles Rd. Union City, CA 94587
CSS-Antioch Lobby, Conference Room and Vehicles	2505 W 10th St. Antioch, CA 94509

The Title VI notice and program information is also provided on agency's website at www.VistAbility.org.

Title VI Transportation Complaint Procedures

As a recipient of federal dollars, VistAbility is required to comply with Title VI of the Civil Rights Act of 1964 and ensure that services and benefits are provided on a non-discriminatory basis. The agency has in place a Title VI Complaint Procedure, which outlines a process for local disposition of Title VI complaints and is consistent with guidelines found in the Federal Transit Administration Circular 4702.1B, dated October 1, 2012.

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

Within 10 business days of receiving the complaint, VistAbility 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. We have 30 days to investigate the complaint. The complainant will be notified in writing of the cause to any planned extension to the 30-day timeframe.

If more information is needed to resolve the complaint, VistAbility may contact the complainant. The complainant has 10 business days from the date of the letter to send requested information to the investigator. If the investigator is not contacted by the complainant or does not receive the additional information within 10 business days, VistAbility can administratively close the complaint. A complaint can also be administratively closed if the complainant no longer wishes to pursue it.

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 complaint and states that there was not a Title VI violation and that the complaint will be closed. An LOF summarizes the complaint and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff, 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.

Procedimientos de Quejas de Transporte del Título VI

Como beneficiario de fondos Federales, VistAbility debe cumplir con el Título VI de la Ley de los Derechos Civiles Acta de 1964 y asegurar que los servicios y beneficios se brinden sobre una base no discriminatoria. VistAbility tiene establecido un procedimiento de quejas Title VI, que describe un proceso para la disposición local de quejas del Título VI y es compatible con las directrices que se encuentran en la Circular 4702.1B de la Administración Federal de Tránsito de Octubre 1, 2012.

Cualquier persona que crea que ha sido objeto de discriminación por motivos de raza, color, u origen nacional por parte de VistAbility, puede presentar una queja del Título VI llenando y enviando el formulario de queja de la agencia. VistAbility investiga las quejas recibidas a mas tardar 180 días después del presunto incidente. VistAbility solo procesará las quejas que están completas.

Dentro de 10 días hábiles de haber recibido la queja, VistAbility la revisará para determinar si nuestra oficina tiene la jurisdicción. El demandante, recibirá un acuse de recibo informándole que sera notificado por escrito si el caso de él/ella sera investigado por nuestra oficina. VistAbility tiene 30 días para investigar la queja. El demandante será notificado por escrito de la causa de cualquier extension prevista de la norma de los 30 días.

Si se necesita más información para resolver el caso, VistAbility puede contactar el demandante. El demandante tiene 10 días hábiles de la fecha que recibió la carta para enviar la información solicitada a el investigador. Si el investigador no es contactado o no recibe la información adicional dentro de los 10 días hábiles, VistAbility puede cerrar el caso administrativamente. Un caso también puede ser cerrado administrativamente si el demandante no desea proseguir con el caso.

Después de que el investigador analice la queja, él/ella emitirá una de las dos cartas al Demandante: una carta de cierre o una carta de conclusines (LOF). Una carta de cierre resume la queja y afirma que no hubo una violación del Título VI, y que el caso se cerrará. Una LOF (carta de conclusiones) resume la queja y las entrevistas sobre el supuesto incidente, y explica si alguna acción disciplinaria, capacitación adicional del personal u otra acción ocurrirá. Si el demandante desea apelar la decision, él/ella tiene 10 días hábiles después de la fecha de la carta o el LOF para hacerlo.

Una persona también puede presentar una queja directamente con la Administración de Tránsito Federal (Federal Transit Administration) al FTA Oficina de Derechos Civiles, 1200 New Jersey Avenue SE, Washington, DC 20590.

VistAbility's Title VI Transportation Complaint Form

COMPLAINT FORM

Section I: Please write legibly		
1. Name:		
2. Address:		
3. Telephone:	3.a. Secondary Phone (<i>Optional</i>):	
4. Email Address:		
5. Accessible Format Requirements?	<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 (<i>check all that apply</i>):		
<input type="checkbox"/> Race	<input type="checkbox"/> Color	<input type="checkbox"/> National Origin
12. Date of incident: (<i>mm/dd/yyyy</i>)		
13. Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) (if known), as well as names and contact information of any witnesses. If more space is needed, please attach additional sheets of paper.		

VistAbility’s Title VI Transportation Complaint Form

COMPLAINT FORM, Page 2

Section IV:		
14. Have you previously filed a Title VI complaint with VistAbility?	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? <input type="checkbox"/> YES* <input type="checkbox"/> NO If yes, check all that apply: <input type="checkbox"/> Federal Agency _____ <input type="checkbox"/> State Agency _____ <input type="checkbox"/> <input type="checkbox"/> Federal Court _____ <input type="checkbox"/> Local Agency _____ <input type="checkbox"/> 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:

VistAbility
1340 Arnold Drive, Suite 127
Martinez, CA 94553

VistAbility's Título VI Formulario de Queja de Transporte

FORMULARIO DE QUEJA

Sección I: Por favor escriba en forma legible		
1. Nombre:		
2. Dirección:		
3. Teléfono:	3.a. Teléfono Secundario (<i>Opcional</i>):	
4. Dirección de correo electrónico:		
5. ¿Requisitos de formato accesible?	<input type="checkbox"/> Letra Grande	<input type="checkbox"/> Cinta de Audio
	<input type="checkbox"/> TDD	<input type="checkbox"/> Otro
Sección II:		
6. ¿Está presentando esta queja en nombre propio?	SI*	NO
*Si contestó "sí" a la pregunta #6, vaya a la Sección III.		
7. Si contestó "no" a la pregunta #6, ¿Cuál es el nombre de la persona para la cual usted está presentando esta queja? Nombre:		
Name:		
8. ¿Cuál es su relación con esta persona?		
9. Por favor explique porque presenta la queja en nombre de un tercero:		
10. Por favor confirme que ha obtenido permiso de la persona agraviada para presentar esta queja en su nombre. aggrieved party to file on their behalf.	SI	NO
Sección II:		
11. Considero que la discriminación de la que fui objeto se basó en (<i>marque todas las opciones que correspondan</i>):		
<input type="checkbox"/> Raza	<input type="checkbox"/> Color	<input type="checkbox"/> Nacionalidad
12. Fecha del incidente: (<i>mm/dd/aaaa</i>)		

13. Explique lo más claramente posible lo que ocurrió y por qué usted cree que fue objeto de discriminación. Describa a todas las personas que participaron. Incluya el nombre y la información de contacto de la(s) persona(s) que lo discriminaron (si los conoce), así como los nombres e información de contacto de cualquier testigo. Si necesita más espacio, por favor adjunte hojas adicionales.

VistAbility's Título VI Formulario de Queja de Transporte

FORMULARIO DE QUEJA, Página 2

Sección IV:		
14. ¿Ha presentado anteriormente una queja del Título VI con VistAbility?	SI	NO
Sección V:		
15. ¿Ha presentado esta queja ante cualquier otra agencia Federal, Estatal o local, o ante cualquier tribunal Federal o Estatal?		
<input type="checkbox"/> SI* <input type="checkbox"/> NO *Si contestó "sí", marque todas las opciones que correspondan:		
<input type="checkbox"/> Agencia Federal _____		<input type="checkbox"/> Agencia Estatal
<input type="checkbox"/> Tribunal Federal _____		<input type="checkbox"/> Agencia Local
<input type="checkbox"/> Tribunal Estatal		
16. Si contestó "sí" a la pregunta #15, proporcione la información acerca de una persona de contacto en la agencia/tribunal donde se presentó la queja. where the complaint was filed.		
Nombre:		
Puesto:		
Agencia:		
Dirección:		
Teléfono:		Dirección de correo electrónico:
Sección VI:		
Nombre de la Agencia de Tránsito contra la que se presenta la queja:		
Persona de contacto:		
Teléfono:		

Puede adjuntar cualquier material escrito u otra información que usted considere pertinente para su queja.

Se requiere firma y fecha a continuación para completar este formulario:

Firma

Fecha

Favor de presentar
este formulario en

persona enviarlo
por correo a la
siguiente dirección:

VistAbility
1340 Arnold Drive,
Suite 127
Martinez, CA

94553

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

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

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

Public Participation Plan: Promoting Inclusive Public Participation

About VistAbility's Adult Programs

VistAbility is a non-profit 501(c)(3) organization that provides direct services and advocacy to adults with intellectual and other developmental disabilities. Many adult day programs operated by VistAbility are licensed by the State of California Health and Human Services Agency, Community Care Licensing Division. Services for all programs are purchased by Regional Center of the East Bay (RCEB), which refers eligible participants to enroll. RCEB, Department of Rehabilitation, Public Schools and individuals may make service referrals to VistAbility. The adult programs do not serve the general public, as there is a requirement to meet Regional Center criteria for a developmental disability. As such, the programs work in conjunction with RCEB and other agencies to achieve various outreach opportunities. One main method of outreach includes participation in local Transition Fairs where information is provided to Special Education students and their families, who are leaving the public school system and entering adult day programs. In 2004, VistAbility received a State grant to serve people moving to the community as a result of the closure of Agnews Developmental Center in San Jose, CA. This project was subsequently expanded in 2016 for people moving to the community from Sonoma State Developmental Center.

The adult programs' curriculum includes training in the areas of social skills, self-advocacy, vocational skills, personal health and safety, technology, education, community integration, recreation, independent living skills, and employment. The programs provide door-through-door transportation and supervision to and from the program for approximately 65 participants under RCEB contracts, and conduct daily community integration trips for about 250 people. All others are transported by private carriers, public transit, para transit, or families.

Purposes of this Plan

Public participation is the process through which stakeholders can partake directly in agency decision-making, and express their concerns, desires, and values. It is the mission of this agency to "improve the lives of people with disabilities by creating opportunities to maximize their independence." At every opportunity, through our website, annual meetings, satisfaction surveys, and community events, the agency solicits input from stakeholders in order to best support persons served without creating disproportionately high or 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 VistAbility as they relate to Title VI requirements under the Public Participation Plan. Many of our activities are conducted in partnership with other service organizations, generic community services, and non-profit agencies within the community. This is in no way a complete list, but rather documents a sample of the agency's outreach efforts as they relate specifically to minority, low-income populations, and people with intellectual and other developmental disabilities.

Board Meetings Open to the Public

VistAbility holds quarterly Board meetings which are open to the public.

Contra Costa County Developmental Disabilities Council

VistAbility has on-going representation on our County's Developmental Disabilities Council. The Developmental Disabilities Council meets monthly and addresses all aspects of our local service systems, including transportation challenges. Representatives on this Council include residential service providers, school personnel, service providers to children and adults with disabilities, attorneys, Regional Center of the East Bay personnel, State and Federal legislative representatives, County Board of Supervisors representatives, as well as families and people with disabilities. This Council is involved in various outreach efforts in our community, with our agency's active participation and support. Examples include: two Transition Fairs, Congreso Familiar, an annual Town Hall meeting with local legislators, STAR Parent Conference (Autism), Asian Community Mental Health Services Parent Conference, and much more.

Two Annual Contra Costa County Transition Fairs

VistAbility supports the organization of and participates in two annual Transition Fairs in Contra Costa County, with outreach targeting families and students in Special Education that will be leaving the school districts. Translation services in Spanish and Southeast Asian languages are available and provided by our staff. Both fairs are held in March and April of each year. Break-out sessions, explaining adult services in Spanish are routine. Each Transition Fair typically logs 200-300 attendees.

Regional Center of the East Bay's (RCEB) Provider-Vendor Advisory Board (P-VAC)

VistAbility maintains representation on RCEB's Provider-Vendor Advisory Board

(PVAC) which meets monthly. This volunteer advisory board is made up of providers of Regional Center services, including personnel from residential homes, day programs, employment services, etc. for both Alameda and Contra Costa Counties. Community topics are addressed at each meeting, including transportation challenges for those communities.

Various Chambers of Commerce

VistAbility belongs to and employees attend numerous Chambers of Commerce including the cities of:

- Richmond, CA;
- El Cerrito, CA;
- Concord, CA;
- Antioch, CA;
- Walnut Creek, CA;
- Pleasant Hill, CA;
- Martinez, CA;
- and a County-wide Hispanic Chamber.

These outreach efforts inform City leaders and business people of the needs, abilities and challenges of people with intellectual and other developmental disabilities in our local communities. These contacts are instrumental in developing business relationships, including the hiring of our program participants or providing paid work opportunities within our employment services.

Local Meals on Wheels and Senior Outreach Programs

Several programs of the Community Access Services division of VistAbility volunteer in four local Meals on Wheels and Senior Outreach Programs in Contra Costa County and the City of Berkeley. With the support of our staff, program participants deliver meals, make safety checks, and bring good cheer to homebound seniors in three parts of our County. This is an optimal service, both in terms of therapeutic value to people with disabilities giving back to their community, as well as benefiting homebound seniors.

Respite Inn

VistAbility has volunteer board representation on the Respite Inn, a collaborative home providing respite services to families with children with developmental disabilities. This service is supported by many local non-profit agencies and local service clubs. It is vendorized by the Regional Center of the East Bay and provides much needed breaks for families and provides activities in the community for persons served. Occasionally, VistAbility shares wheelchair accessible vehicles with the Respite Inn for community access

during evenings and weekends.

Contra Costa County Accessible Transportation Strategic Plan Task Force:

VistAbility is an active volunteer member of the Contra Costa County Accessible Transportation Strategic Plan Task Force, working to implement the approved coordinated plan (2024), focusing on the travel needs of seniors, persons with disabilities and low income individuals in our community.

VistAbility continues to monitor and give input to the implementation of this Plan and actively participate as opportunities arise, to assist in bringing coordination and improve services to public transit riders.

Service Club Presentations

VistAbility routinely speaks at service clubs throughout our County, including, but not limited to, Lion's International, Rotary, and various women's groups. Continued interaction with these groups has resulted in cash donations, volunteer maintenance work, paid work opportunities for people with disabilities, and other benefits. Educating the club members as to the abilities of people with developmental disabilities is an additional benefit to these relationships.

D/AFN Coordinators for the Contra Costa County Office of Emergency Services:

VistAbility provides 2 active volunteers to the CCC Office of Emergency Services (OES) to function as Disabilities/Access and Functional Needs Co-Coordinator. These volunteers attend emergency planning meetings in communications and transportation emergency functions, give input into the OES emergency plan, participate in tabletop and in-person exercises and have seats in the Emergency Operations Center during disasters under the Care and Shelter division. In addition, they represent Contra Costa County in statewide Access and Function Needs meetings with Cal-OES.

Outreach Plan

Being the largest organization in the East Bay serving people with intellectual and other developmental disabilities since 1965, VistAbility has been a leader in providing outreach services to minorities, LEP populations and people with intellectual and other developmental disabilities and mental health needs (underserved populations).

As noted previously, our agency values and routinely considers the feedback from program participants, their families and other stakeholders. We are mission-driven with core values that reflect advocacy and outreach to all people with developmental disabilities.

One example includes the acquiring of Asian Family Resource Center in 2012. This was a day program operated by Asian Community Mental Health Services in Richmond, CA, that was closing due to financial problems. Rather than have this important service to new immigrants eliminated, VistAbility it and has expanded its enrollment to serve more non-English speaking clientele with developmental disabilities and their families. In 2020, VistAbility also took over their behavioral health services, as Asian Community Mental Health subsequently went out of business.

VistAbility maintains current outreach efforts in our community, including:

- Continued representation on the Contra Costa County Developmental Disabilities Council and sub-committees to advocate for all people with developmental disabilities;
- Continued representation on Regional Center's Provider-Vendor Advisory Board;
- Organizing and participating in two annual Transition Fairs;
- Membership and participation in various Chambers of Commerce;
- Collaboration with the Respite Inn;
- Collaboration with the local Meals on Wheels and Senior Outreach Programs;
- Continued voluntary participation in implementing the Contra Costa County Accessible Transportation Strategic Plan Task Force;
- Continued active involvement in the Contra Costa County Office of Emergency Services, as volunteer Disabilities and Access and Functional Needs Co-Coordinator.

Additional outreach efforts include:

- Notices posted and distributed in the appropriate languages on the agency's website, at the adult day programs, public schools, through the DD Council and other boards, along with our website for special projects and events;
- E-mail distribution of notices to our Friends and Families e-mail list;
- News releases both on the internet and other social media.
- Providing volunteer translation services using existing staff and purchasing translation services when necessary;
- Maintaining our translation services vendorization with Regional Center of the East Bay to provide translators to other agencies;
- Utilizing the agency's wireless headsets for translation services in meetings, trainings, and conferences;
- Continuing parent and sibling support groups in Spanish.
- Continuing a collaborative relationship with Asian Behavioral Health Services, providing support to families in multiple Asian languages.

Each program participant served by VistAbility attends an annual meeting to discuss his/her/their program goals. Meetings are held in his/her/their preferred language with translators that are volunteer agency personnel or

hired. Transportation needs are addressed in each meeting, as well. Following the meeting, Satisfaction Surveys are distributed to the participant, his/her family, the Regional Center Case Manager, and other attendees for specific feedback on services. The feedback received guides any service revisions or unmet service needs. VistAbility uses this information in its RCEB-approved Program Evaluation System to guide service changes and to determine trends in service needs.

LIMITED ENGLISH PROFICIENCY (LEP) PLAN

Overview

The first section in this document describes the Purpose of the Limited English Proficiency (LEP) Plan. 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:

- o **Factor 1:** The number or proportion of LEP persons in the service area who may be served or are likely to encounter VistAbility's adult programs, activities, or services.
- o **Factor 2:** The frequency with which LEP persons come in contact with VistAbility's activities or services.
- o **Factor 3:** The nature and importance of programs, activities or services provided by the agency to the LEP population.
- o **Factor 4:** The resources available to VistAbility and overall cost to provide LEP assistance.

The third section discusses the Implementation of the Limited English Proficiency Plan, which includes methodologies for identifying LEP individuals, providing services, communicating availability of language assistance, and updating the Plan.

Purpose of the Limited English Proficiency (LEP) Plan

This Limited English Proficiency (LEP) Plan was developed during the process of preparing VistAbility's Title VI Program to ensure the services are accessible to Limited English Proficient (LEP) individuals. Title VI of the 1964 Civil Rights Act is one of two federal mandates that guarantee the provision of meaningful access to federally-funded services for LEP individuals:

- Title VI of the Civil Rights Act of 1964 prohibits federally-funded agencies from discriminating against individuals based on race, color, and national origin and includes meaningful access to LEP customers 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.
- President's 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 respect to individuals of a particular race, color, or national original.”

- 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 an 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. VistAbility’s LEP Plan includes a four-factor analysis and implementation plan that complies with the requirements of DOT LEP guidance.

Four Factor Analyses

Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by VistAbility’s Adult Programs

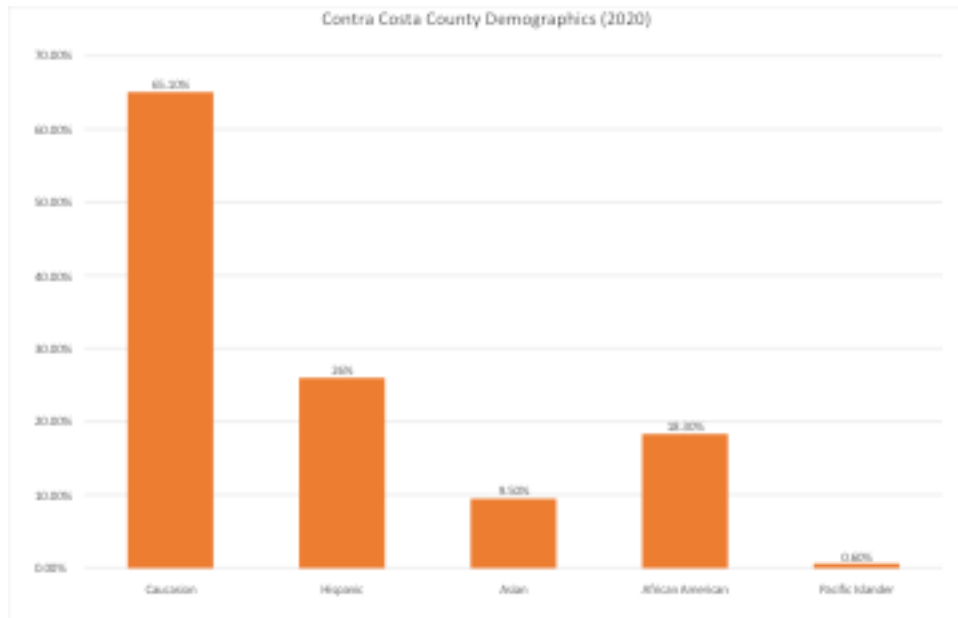
VistAbility holds a unique position in regard to meeting the Title VI requirements. As a sub-recipient of FTA 5310 Grant funding, the agency's focus is primarily to transport adults with disabilities where current public transit options are insufficient or do not exist. Our program participants or "riders" must be referred into the program by Regional Center of the East Bay (RCEB). As such, we do not offer transportation to the general public. Therefore, an analysis of public demographic data in Contra Costa County 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:

- Contra Costa County’s Demographics from the U.S. Census (2020), with regard to Language and Limited English Proficiency
- The RCEB Summary Performance Report (Summer 2025) shows RCEB demographics for the combined Counties of Alameda and Contra Costa;
- The current demographics of the adult participants served by VistAbility;
- RCEB’s Annual Purchase of Services Report for fiscal year 2024-2025 that shows expenditures by language for Contra Costa and Alameda Counties combined.

Contra Costa County Demographics

According to the 2020 U.S. census figures, Contra Costa County had a population of 1,049,025, with demographics as follows:



Graph 1: Population of Contra Costa County by ethnicity.
Source: U.S. Census Bureau (2020)

In 2020, almost 35.8% of Contra Costa residents 5 years and older reportedly spoke languages other than English at home. Of that 33%, more than half spoke Spanish and more than one-quarter spoke Asian languages.

Table 1: Languages Costa County.

Languages Spoken	%
English	67.4%
Non English	32.6%
Spanish	52.6%
Asian or Pacific Islander	26.1%
Other	21.3%

spoken in Contra

Source: Contra Costa County (2020)

It is interesting to note, according to Contra Costa County (2020), 13% of the population 5 years and older spoke English less than 'very well', which qualifies them as LEP.

The following factors are also interesting:

- 74.6% of Contra Costa residents are born in the U.S.
- 25.4% are foreign born (an increase of 6% in last 10 years)
- Of the 25.4% who are foreign born, 10.4% are citizens and 15% are not citizens.
- 7.2% of Contra Costa residents live below the federal poverty level.

Regional Center of the East Bay (RCEB) Demographics

RCEB is the primary funding source for VistAbility's adult programs. All persons served must meet eligibility requirements and be diagnosed with a developmental disability. There are 5 developmental disabilities, which must be present and diagnosed before a person is 18 years old that include:

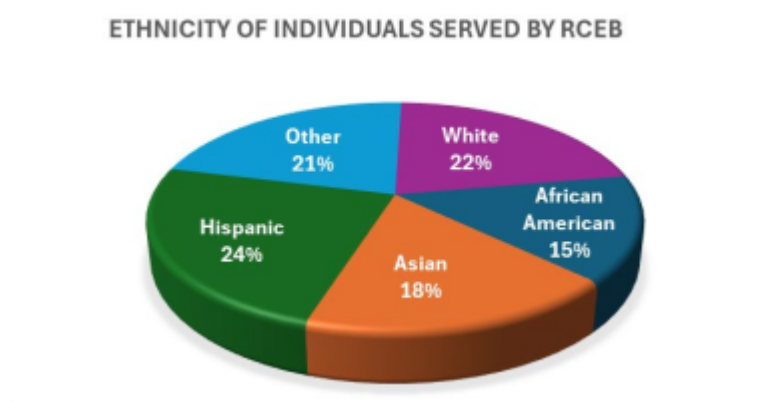
- Epilepsy
- Cerebral Palsy
- Intellectual Disabilities
- Autism Spectrum Disorders
- And other neurological disorders that significantly impair functioning.

The types of services offered to qualifying clientele include day programs, respite services, durable medical equipment (e.g., wheelchairs), behavioral intervention, counseling, various therapies, independent living services, transportation, mobility training, residential services and more. **These services are provided at no cost to the persons served or their families.**

Services and funding of those services are determined by an Individual Program Plan process, with meetings held annually. Purchase of Service contracts are made between RCEB and a vendorized service provider, such as VistAbility.

The RCEB Summary Performance Report for Summer 2025 identified the ethnicity of persons served in Contra Costa and Alameda counties combined. RCEB covers both counties and does not publish their demographics separately. According to this report RCEB funded services for 27,550 people during the most recent reporting year.

The ethnicity of the population served in both counties is noted below:



Graph 2: RCEB population served by ethnicity in both Alameda and Contra Costa Counties.
 Source: RCEB Summary Performance Report, Summer 2025

This data indicates a lower African American population overall as well as a much lower Caucasian population of people served by RCEB as compared to the general demographics of Contra Costa County. At the same time, the Asian population served at RCEB is higher. However, the Hispanic population percentages appear similar.

In addition, when looking at the data collected of primary languages of people served by RCEB, again, this data appears lower to that published by Contra Costa County and is represented here:

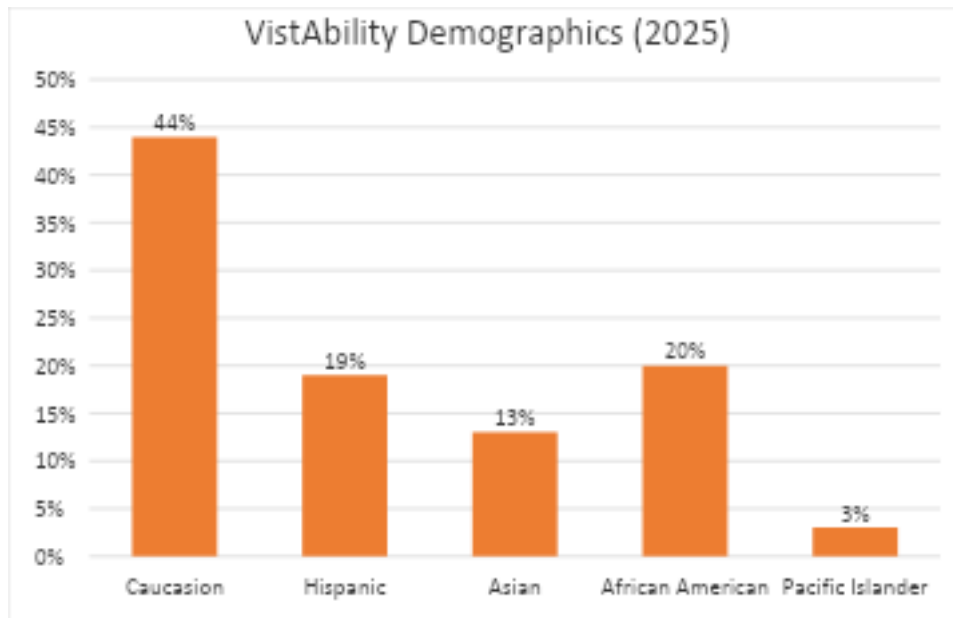
Languages Spoken by Clients of RCEB Fiscal Year 2023-2024	Individuals Count
Chinese	708
English	21,237
Spanish	4,581
Vietnamese	285
All Other Languages	371

Graph 3: Primary languages of persons served by RCEB in both Alameda and Contra Costa counties combined

Source: RCEB Annual Purchase of Service Report for Fiscal Year 2023-2024, Performance Report Summer 2025

VistAbility Demographics of Adult Programs

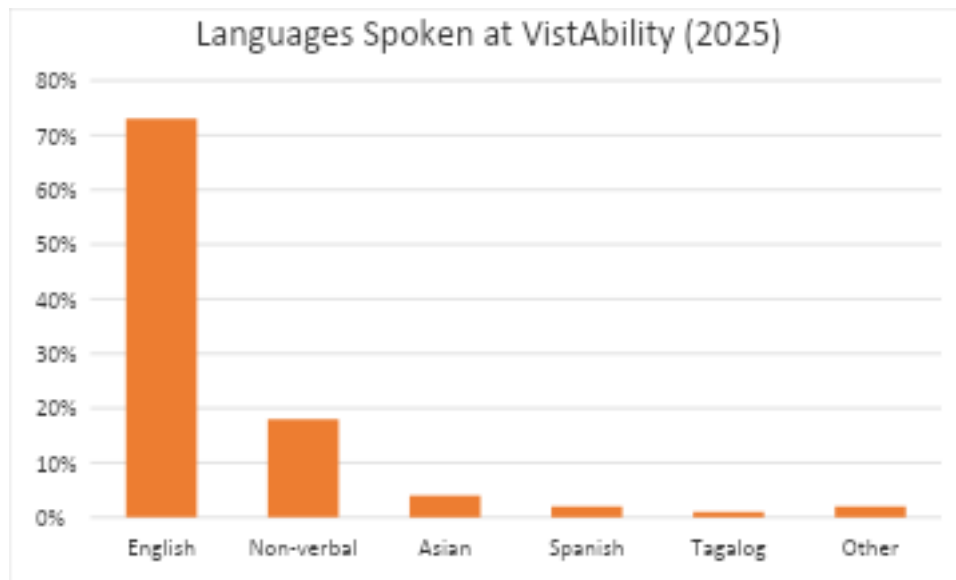
VistAbility’s adult programs, funded by RCEB, serve approximately 500 people on a daily basis (Monday-Friday). Ethnicity data includes:



Graph 4: VistAbility Adult Program Participants by Ethnicity (2022)

While the Caucasian and African American populations are very similar to that of RCEB’s ethnic demographics, VistAbility serves lower than the Asian population than the Hispanic populations at RCEB. This variation is also evident when comparing VistAbility’s demographics to those of Contra Costa County. One significant factor may be the acquisition of Asian Family Resource Center, which serves a high percentage of Alameda County residents from Southeast Asia.

Primary languages spoken by persons served in VistAbility programs are reflected below in Graph 5. It is interesting to note that 18% of this population is non-verbal, due to developmental disabilities.



Graph 5: Primary language spoken of persons served by VistAbility (2025)

Excluding English speakers and those that are nonverbal, 4% of VistAbility's population speaks Southeast Asian languages, 2% speak Spanish and 3% speak other languages.

It is clear that persons served by VistAbility in any one language do not meet the trigger point of 5% described in the *Safe Harbor Provision of the Federal Transit Authority Circular 4702.1B*.

However, VistAbility does provide oral translation services via employees that are bilingual or by hiring translators, when necessary, to meet the needs of the persons served.

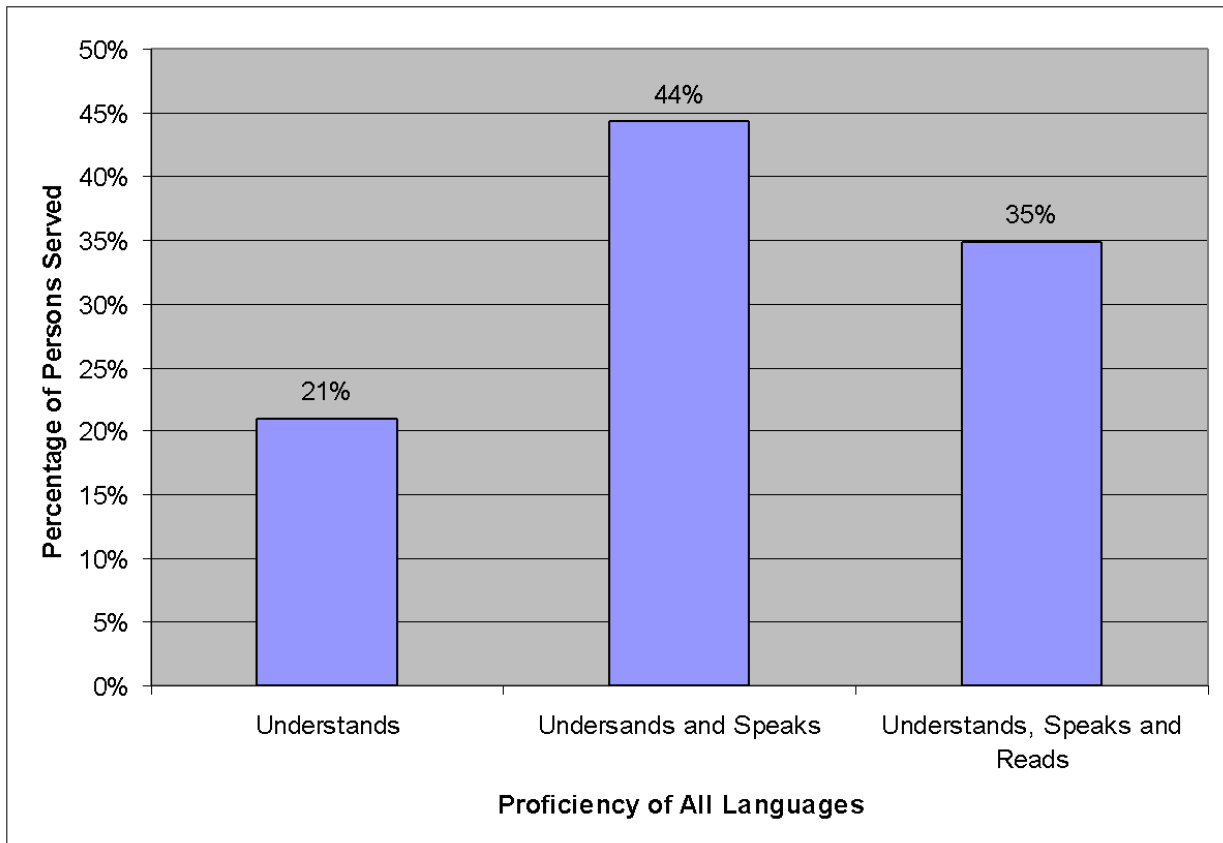
VistAbility currently employs approximately 105 bilingual staff. Of the overall 290 staff, 38% speak, understand and write in a language in addition to English. Of those 105 bilingual staff, the largest percentage speaks Spanish. Southeast Asian languages include Cantonese, Mandarin, Vietnamese, Mien, Cambodian and Korean. Other languages include Portuguese, Tagalog, Russian, Ukrainian, Samoan, Farsi, Hindi, and Sign Language.

VistAbility recruits and relies upon current bilingual employees to provide oral and written translation services to people in the adult day programs and to their families. In addition, RCEB provides Case Managers that speak the language of their clientele. Thus, when a referral is made to our agency, intake reports reveal the person's primary language spoken, prior to receiving services.

VistAbility tracks in its RCEB-approved Program Evaluation System the reasons given for program participants who have exited the programs. Primary reasons

include illness (hospitalizations), moving out of the Bay Area, behavior that is a danger to self or others, or successful transitions to higher level programs or employment. There were no people that were underserved or exited the program due to language barriers.

One additional important Factor 1 consideration of the persons served by VistAbility involves the quality of language proficiency, including English. Due to the developmental disabilities of people served, approximately two-thirds do not read, as noted on Graph 7, below.



Graph 7: Language proficiency of all adults served by VistAbility (2025)

The program participants who speak English or any other language, less than "very well" (i.e., understands and/or speaks any language) typically have developmental disabilities that cause barriers to speech or other forms of communication. Limited English Proficiency (LEP) is not significantly present in this population solely due to a language barrier. Thus, oral or video translation of vital documents is generally the most effective communication methods.

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

the program.

Generally, program participants attend VistAbility adult day programs, under contract with RCEB, 5 days per week. Communication with families is essential and sometimes occurs daily, weekly, monthly, or, at the very least, quarterly.

As evidenced by the number bilingual staff at VistAbility (Graph 6), translation services are readily available to people that call, walk-in visitors, those participating in direct services and annual meetings. In addition, RCEB staff also provides translation services at annual meetings.

VistAbility's Asian Family Resource Center is under contract with RCEB to provide translation services on an on-call basis to individuals and families who are seeking services from RCEB. These translators provide oral translations in the following languages: Chinese, Mandarin, Vietnamese, Mien, Cantonese and Cambodian, as many new Asian immigrants do not read. In fact, it is interesting to note, that Mien is an oral language only, and does not have written symbols.

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

The primary purpose of VistAbility's day programs is to provide individualized services that promote independence and self-sufficiency. This is accomplished via an Individual Program Plan process, as required by the State Department of Developmental Services. Outcome measures for our services include attaining a higher level of employment; improving independence in daily living to improve self-sufficiency; moving to a service that is less restrictive; and safely interacting with the community and generic services. All outcomes are intended to improve the quality of lives of the people served and promote lifelong learning, whether it is employment to combat poverty, education, including English as a Second Language classes, or training in independent living.

Mobility training and providing specialized transportation services is an integral part of our services, allowing people to frequently access the community.

VistAbility's adult programs currently serve approximately 550 participants daily. The length of time an individual is typically enrolled in the program can range from a few months to many years. Participants are not required to "graduate" and may remain in the program as long as their needs and preferences continue to be met.

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

The RCEB Annual Purchase of Service Report for Fiscal Year 2024-2025 identifies total annual expenditures and authorized services purchased by language, as shown in Graph 8 below.

All ages

	Individuals Count	Total Expenditures
Chinese	708	\$ 59,053
English	21,237	\$ 29,518
Spanish	4,581	\$ 10,997
Vietnamese	285	\$ 12,437
All Other Languages	371	\$ 13,324

Graph 8: Expenditures by Language for Alameda and Contra Costa Counties combined, all ages
Source: RCEB Annual POS Report for Fiscal Year 2023-2024, Performance Report Summer 2025

Due to the high cost of American Sign Language interpretation services, it makes sense that services for people that are deaf are costly, due to interpretation needs. At the same time, the varying Asian languages in the Bay area require specialists for interpretation services. Spanish interpretation is primarily handled by bilingual Regional Center staff, without additional costs added to services. The "Other" category includes Urdu, Arabic, Farsi, Hindi, Tagalog and other languages.

VistAbility's operating budget does not have a specific line item for providing language translation services and outreach. Outreach expenses (Transition Fairs, events, etc.), translation of documents and translators for meetings are primarily in-kind expenditures, utilizing current staff, with the assistance of volunteers and family members; vehicles; grants; and other resources.

In a typical year, VistAbility receives approximately \$10,000 from RCEB for translation services through a contract with our Asian Family Resource Center. Translation equipment (wireless headsets) are maintained by VistAbility and used in workshops, trainings and conferences.

Summary

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

- VistAbility’s LEP population is similar to that of Contra Costa County demographics and RCEB LEP populations.
- Language proficiency is primarily affected by disability rather than a language barrier alone, as evidenced by the high percentage of people served that are non-verbal (18%) and the high percentage of people that do not read/write due to their developmental disabilities (65%).
- VistAbility’s LEP participants understand approximately 12 different languages.
- VistAbility’s employees are able to provide translation services in 21 different languages including ASL, with roughly 38% of the staff being bilingual.
- RCEB contracts with Asian Family Resource Center to provide translation services in Chinese, Mandarin, Vietnamese, Mien, Cantonese and Cambodian to other agencies in the community;
- No participants are underserved or have exited the program due to language barriers.
- **The LEP population served by VistAbility does not meet the trigger percentage of the *Safe Harbor Provision* of the Federal Transit Authority Circular 4702.1.**
- The LEP persons served by VistAbility are in daily contact (5 days per week) with our bilingual personnel.
- Services are important to promote independence, self-sufficiency (employment to get out of poverty) and community integration.
- VistAbility primarily uses existing staff and, at times, outside resources for services for the LEP population.

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."

Language Assistance Implementation Plan

Identifying LEP Individuals






As evidenced by the Four Factor Analysis, very few "true" LEP individuals participate in VistAbility's adult programs. The predominant minority language in the region is Spanish, in addition to various Southeast Asian languages. The participants that are served by VistAbility have developmental disabilities that affect language proficiency more so than a language barrier alone, as 18% are non-verbal and approximately 65% do not read or write.

RCEB is the primary referral source for VistAbility services, along with the Dept. of Rehabilitation for employment services. Thus, the LEP population is identified during the RCEB intake process and each eligible person is assigned a bilingual Case Manager. Thus, VistAbility has prior knowledge of the primary language of the people being referred.

Providing Services

VistAbility recruits and hires bilingual staff, routinely. Currently, 38% of the staff is bilingual, with 53% of those fluent in Spanish. Another 25% of those are bilingual in Southeast Asian languages, and 7% in American Sign Language. VistAbility staff are able to provide oral translation services, written translation services, and case management services in the corresponding cultures.

The following translated VistAbility documents are available:

-  Title VI Notice to the Public (Spanish, Cantonese)
-  Title VI Complaint Form (Spanish, Cantonese)
-  Title VI Complaint Procedures (Spanish, Cantonese)
-  Participant Program Handbook (Spanish video)
-  Agency website Title VI information (Spanish, Cantonese)
- Satisfaction Surveys (Spanish, Cantonese, Vietnamese)
- Don't Be Scared, Be Prepared* disaster preparedness booklet (Spanish, Cantonese)

Other documents and communications are translated orally or by video.

Communicating Availability of Language Assistance

Individuals who are referred to VistAbility's adult programs for services are assigned a Case Manager by RCEB who provides one-on-one guidance and program planning.

VistAbility staff, including reception staff, can offer translation services as needed, to callers, guests, and families. The agency's website also contains summary information in Spanish and Cantonese with instructions on how to obtain more information.

Monitoring

VistAbility's Annual Report provides an analysis for trends and patterns that indicate a need for additional services. This report includes ethnicity and can be used as a guide to determine the need for additional translation services and bilingual staff.

Satisfaction Surveys for the programs offer an opportunity for participants, their families, and RCEB Case Managers to provide input or suggest additional services. This information is summarized quarterly in the agency's Program Evaluation System and is published annually on VistAbility's website.

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

VistAbility Employee Training

VistAbility values cultural diversity and integrates respecting diversity in a variety of ways:

- Part I of the New Employee Orientation (1st day on the job) includes a section entitled "Diversity" that includes a video and discussion. In addition, our Staff Handbook starts with "A Culture of Service" philosophy which is carried on throughout employment.
- As part of our Safety Program, VistAbility employees receive an annual (45 minutes) training entitled, "Respecting Diversity".
- VistAbility's internal training classes include a 6-hour training entitled "Communication, Ethics and Respecting Diversity", which is available to all employees free, and is open to other service provider partners for a nominal fee.
- In addition, agency staff teach classes to the persons served, and hosts events that highlight various cultures for educational purposes.

As previously stated, VistAbility's adult programs serve individuals with moderate to severe developmental disabilities. As such, the majority of

participants has limited literacy skills and is unable to read or write. Thus, oral translations by program staff are most effective.

Membership of Non-Elected Committees and Councils

VistAbility does not have a non-elected planning board.

Title VI Equity Analysis

VistAbility does not have transit related facilities.