

# Peppermint Ridge



Empowering Individuals with Developmental Disabilities Since 1959

## TITLE VI PROGRAM

**Developed: January 2023**  
**Approved by Peppermint Ridge Board of Directors:**  
**January 24, 2023**

**Peppermint Ridge, Inc.**  
**825 Magnolia Ave.**  
**Corona, CA 92879**  
**Ph: (951) 273-7320**

Peppermint Ridge - Title VI Program

[www.PeppermintRidge.org](http://www.PeppermintRidge.org)

INTRODUCTION

This document was prepared by Peppermint Ridge, Inc. (Peppermint Ridge) 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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## Peppermint Ridge's Title VI Notice to the Public

### Notifying the Public of Rights Under Title VI

## Peppermint Ridge

- Peppermint Ridge 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 Peppermint Ridge.
- For more information on Peppermint Ridge's civil rights program, and the procedures to file a complaint, contact (951) 273-7320, or visit our administrative office at 825 Magnolia Ave., Corona, CA 92879.
- For more information, visit [www.PeppermintRidge.org](http://www.PeppermintRidge.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 (951) 273-7320

Notificar al público de los derechos bajo el título VI

## Peppermint Ridge

- Peppermint Ridge 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 Peppermint Ridge.
- Para obtener más información sobre el programa derechos civiles capaz de industrias y el procedimientos para presentar una queja, llame al (951) 273-7320, o visite nuestra oficina administrativa en 825 Magnolia Ave., Corona, CA 92879.
- Para más información, visite [www.PeppermintRidge.org](http://www.PeppermintRidge.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 (951) 273-7320.

## List of Locations Where Title VI Notice Is Posted

Peppermint Ridge's Title VI Notice to the Public is posted at the administrative office, located at 825 Magnolia Ave., Corona, CA 92879. Notices also posted in every home and vehicle operated by Peppermint Ridge.

Location	Address	City
Peppermint Ridge Main Campus – C Home, Roger Residence, Conner Home, Del Park Manor, Evergreen Estate	825 Magnolia Ave.	Corona, CA
Three 16 passenger buses	825 Magnolia Ave.	Corona, CA
Six 9 passenger vans	825 Magnolia Ave.	Corona, CA
Four 8 passenger vans	825 Magnolia Ave.	Corona, CA
Seven 7 passenger vans	825 Magnolia Ave.	Corona, CA
Aspen Home	860 Aspen St.	Corona, CA
Cypress Point	632 Magnolia Ave.	Corona, CA
Dudley Home	4289 Shoalcreek Dr.	Corona, CA
Garrison House	779 Ford St.	Corona, CA
Villa Vadnais	4045 Castle Pines Way	Corona, CA
Wynn Home	1581 Heartland Way	Corona, CA

The Title VI notice and program information is also provided on Peppermint Ridge's website at:

[www.PeppermintRidge.org](http://www.PeppermintRidge.org)

## **Title VI Complaint Procedures**

As a recipient of federal dollars, Peppermint Ridge 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. Peppermint Ridge 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 Peppermint Ridge may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form. Peppermint Ridge investigates complaints received no more than 180 days after the alleged incident. Peppermint Ridge will only process complaints that are complete.

Within 10 business days of receiving the complaint, Peppermint Ridge 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. Peppermint Ridge 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, Peppermint Ridge 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 Peppermint Ridge 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.

## Peppermint Ridge Title VI Complaint Form

### COMPLAINT FORM

<b>Section I: Please write legibly</b>		
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
<b>Section II:</b>		
6. Are you filing this complaint on your own behalf?	YES*	NO
*If you answered "yes" to #6, go to Section III.		
7. If you answered "no" to #6, what is the name of the person for whom you are filing this complaint? Name:		
8. What is your relationship with this individual:		
9. Please explain why you have filed for a third party:		
10. Please confirm that you have obtained permission of the aggrieved party to file on their behalf.	YES	NO
<b>Section III:</b>		
11. I believe the discrimination I experienced was based on (check all that apply):		
<input type="checkbox"/> Race Origin	<input type="checkbox"/> Color	<input type="checkbox"/> National
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.		



## Peppermint Ridge Title VI Complaint Form, Page 2

### COMPLAINT FORM

<b>Section IV:</b>		
14. Have you previously filed a Title VI complaint with Peppermint Ridge?	YES	NO
<b>Section V:</b>		
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:
<b>Section VI:</b>		
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:  
 Peppermint Ridge Title VI Coordinator  
 825 Magnolia Ave.  
 Corona CA 92879

## **Titulo VI Procedimiento de Queja**

Como un receptor de dólares federales, Peppermint Ridge tiene que cumplir con lo dispuesto en el Titulo 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. Peppermint Ridge ha puesto en marcha un procedimiento de queja Titulo VI, que emboza un proceso de disposición local de quejas del Titulo 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 Peppermint Ridge.. puede presentar al Titulo VI su denuncia. Peppermint Ridge investiga las quejas no mas de 180 días después del incidente. Peppermint Ridge solo tramitara las quejas que están completas.

En un periodo de 10 días de haber recibido la demanda, Peppermint Ridge 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. Peppermint Ridge tiene 30 días para investigar la queja.

Si necesita mas información para resolver el caso, Peppermint Ridge 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.

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**FORMA DE QUEJA**

<b>Seccion I: Escribir en forma legible</b>		
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
<b>Seccion II:</b>		
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
<b>Seccion III:</b>		
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.		

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<b>Seccion IV:</b>		
14. Anteriormente ha presentado un Titulo VI denuncia con la Peppermint Ridge.	Si	No
<b>Seccion V:</b>		
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:
<b>Seccion VI:</b>		
Nombre de organismo Transito denuncia es contra:		
Persona de contacto:		
Telefono:		

Puede adjuntar cualquier material escrito y otra información que considere relevante para su queja.

Se requiere la firma y la fecha a continuación para completar el formulario:

Firma \_\_\_\_\_

Fecha \_\_\_\_\_

Envíe este formulario en persona o envíelo por correo a la siguiente dirección:  
 Peppermint Ridge Title VI Coordinator  
 825 Magnolia Ave  
 Corona CA 92879

## Transit-Related Title VI Investigations, Complaints, and Lawsuits

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

### **Peppermint Ridge List of Investigations, Lawsuits and Complaints**

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

## Public Participation Plan

### *About Peppermint Ridge*

Peppermint Ridge is a non-profit 501(c)(3) organization that provides a range of residential and support services to adults with developmental disabilities. Three of the 11 homes (24 beds) are licensed by the State of California Health and Human Services Department of Social Services Community Care Licensing Division. The remaining eight homes (72 beds) are designated to serve residents needing a higher level of care, and are licensed as Intermediate Care Facilities (ICF) through the California Department of Health Care Services.

Services for the 24 residents in the three "Community Care" homes are predominantly purchased by the Inland Regional Center. Services for the 72 residents living in a home designated as an ICF facility, are funded by Medi-Cal. Additionally, Peppermint Ridge receives funding from the Inland Regional Center to serve clients who are able live independently, but need extra support services in the areas of apartment management, medical appointments, and other activities associated with daily living.

While a few referrals come from Regional Center Orange County, Inland Regional Center (IRC) is the primary referral agency for Peppermint Ridge. Peppermint Ridge does not serve the general public, but rather a limited population of adults with disabilities that is first served by IRC, and is then referred to Peppermint Ridge. As such, the agency works in conjunction with IRC and other agencies to achieve various outreach opportunities.

Peppermint Ridge residents and clients have developmental disabilities which cause them to function at a lower to moderate cognitive level. While it is beyond the scope of this agency to measure specific literacy skills, residents generally require a high level of supervision and **have little to no literacy skills**. Generally, any **documents presented to clients are translated orally** due to the level of disability. Additionally, clients have not mastered basic work skills and are unable to earn an income. Most Peppermint Ridge clients receive SSI benefits, which are largely determined by limited resources and income.

Peppermint Ridge's fleet of vehicles includes three 16 passenger vans, five 9 passenger vans, four 8 passenger vans, seven 7 passenger vans, one sedan, one minivan, and three maintenance vehicles. Clients are transported on a regular basis to day programs, medical appointments, and community activities. Peppermint Ridge is licensed to serve 96 residents in the residential program. The supported living program enrolls an

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average of five clients at a time. Given the relatively small size of the program and its limited exposure, the scope and provision of transportation services would have an insignificant impact on the general public and minority and low-income populations in the geographic area. This agency, however, does maintain systems to gather stakeholder input regarding agency services and conducts public relations and outreach activities in order to create meaningful opportunities for public engagement as outlined below.

### ***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 "provide a community of loving homes and empowering support services for adults with developmental disabilities." 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***

The following is a summary of outreach efforts conducted by Peppermint Ridge as they relate to Title VI requirements under the Public Participation Plan. Many of our activities are conducted in partnership or ad hoc outreach with other service organizations and non-profit agencies within the community. This 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**

Peppermint Ridge's monthly Board meetings are open to the public.

### **City of Corona/Riverside County Office of Emergency Services**

Peppermint Ridge has worked in conjunction with the City of Corona to establish an MOU that states that the City of Corona will be able to use PR vehicles in an emergency once Peppermint Ridge clients are safe and stable. In the event of an emergency, The Riverside County Office of Emergency Services and the City will work collaboratively to meet the needs of its citizens. This means that the County of Riverside will also enlist the service of PR vehicles in the event of an emergency. This plan specifically addresses the needs of populations at risk including disabled, minority and low-income.

### **Inland Regional Center (IRC) Transition Fair**

Peppermint Ridge participates annually in the IRC Transition Fair. This event is designed to connect families of children with disabilities who are preparing to leave school and

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enter adulthood to service providers and training programs such as Peppermint Ridge. The event typically attracts 75-100 guests and is translated in Spanish with a live interpreter in order to reach Limited English Proficient individuals.

### **Kiwanis Club, Rotary, Club, And Soroptimist International**

Staff and Board members of Peppermint Ridge are active in a variety of service clubs in Corona, all of which serve minority populations in various ways.

### **Peppermint Ridge Website**

Currently, Peppermint Ridge posts notices and announcement on the agency's website. 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

### *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 Peppermint Ridge program, activity, or service.
- **Factor 2:** The frequency with which LEP persons come in contact with the Peppermint Ridge program, activity or service.
- **Factor 3:** The nature and importance of programs, activities or services provided by Peppermint Ridge to the LEP population.
- **Factor 4:** The resources available to Peppermint Ridge and the overall cost to provide LEP assistance.

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."

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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. Peppermint Ridge'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 in the service area who may be served or are likely to encounter the Peppermint Ridge program, activity, or service.**

Peppermint Ridge 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. Eligible Peppermint Ridge program participants or "riders" must be referred into the program from Inland Regional Center (IRC). As such, Peppermint Ridge does not offer transportation to the general public other than in an emergency as outlined in an MOU with the City of Corona established on 7/29/2008. Therefore, an analysis of public demographic data in Riverside and San Bernardino Counties does not represent actual populations served by this program but is offered for comparison purposes only.

There are two sources of data that most accurately represent LEP persons likely to be served by Peppermint Ridge. The IRC "Purchase of Service Expenditure and Demographic Data for fiscal year 2021/2022 shows IRC purchase of service (POS) authorizations, expenditures and utilization by different demographic categories including language. Peppermint Ridge receives case histories of served clients and maintains a database of pertinent information. A 5-year historical analysis of this data in regard to language proficiency will reflect actual proportions of LEP persons served.

#### **American Community Survey**

The U.S. Census Bureau "2008-2012 American Community Survey (ACS) Language Spoken at Home by the Ability to Speak English" estimates that of the 4,129,195 Riverside and San Bernardino residents, 1,383,154 speak Spanish at home and 629,409, or 15.2%, speak English less than "very well". All other people who spoke non-English languages resulted in less than 1% of the population.

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<b>Riverside County, California</b>	<b>Estimate</b>	<b>Percentage</b>
<b>Total:</b>	<b>2,956,239</b>	<b>100%</b>
<b>Speak only English</b>	<b>1,338,347</b>	<b>45.27%</b>
<b>Spanish</b>	<b>808,946</b>	<b>27.36%</b>
<b>Speak English "very well"</b>	<b>531,302</b>	<b>17.97%</b>
<b>Speak English less than "very well".</b>	<b>277,644</b>	<b>9.39%</b>

<b>San Bernardino County, California</b>	<b>Estimate</b>	<b>Percentage</b>
<b>Total:</b>	<b>2,615,555</b>	<b>100%</b>
<b>Speak only English</b>	<b>1,154,897</b>	<b>44.15%</b>
<b>Spanish</b>	<b>730,329</b>	<b>27.92%</b>
<b>Speak English "very well"</b>	<b>493,585</b>	<b>18.87%</b>
<b>Speak English less than "very well"</b>	<b>236,744</b>	<b>9.05%</b>

<b>Total in Riverside &amp; San Bernardino Counties, California</b>	<b>Estimate</b>	<b>Percentage</b>
<b>Total:</b>	<b>5,571,794</b>	<b>100%</b>
<b>Speak only English</b>	<b>2,493,244</b>	<b>44.74%</b>
<b>Spanish</b>	<b>1,539,275</b>	<b>27.62%</b>
<b>Speak English "very well"</b>	<b>1,024,887</b>	<b>18.39%</b>
<b>Speak English less than "very well"</b>	<b>514,388</b>	<b>9.24%</b>

**Inland Regional Center (IRC) Expenditures**

The IRC Purchase of Service and Demographic Data Report for Fiscal Year 2021/2022 identifies the total annual number of people authorized to receive services. The report shows expenditures for services by primary language spoken but does not ascertain whether English is also spoken "very well" or less than "very well". As indicated in the Riverside and San Bernardino Counties analysis above, Spanish is consistently the primary language for LEP populations.

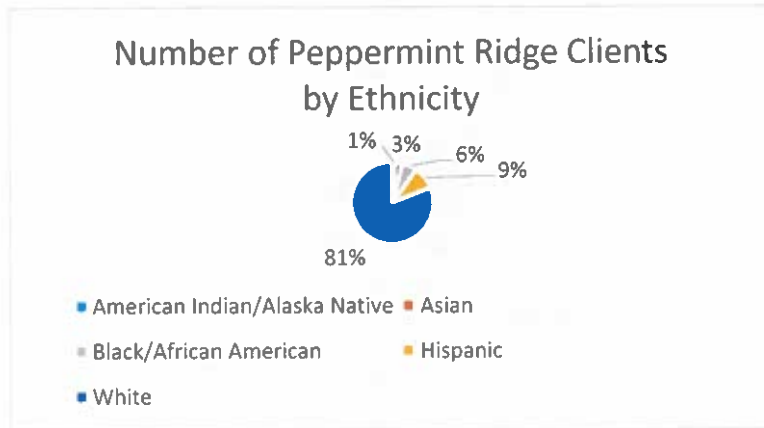
The data from IRC is broken down by age groups. Peppermint Ridge clients are included in the "22 and older" category as Peppermint Ridge is a provider of services purchased by IRC.

The report indicates that authorized services for those consumers 22 and older in FY 2021-2022 totaled 10,837. Of that total, 8,074 (74.5%) were English speaking and 2,763 (25.49%) were Spanish speaking. Total consumers speaking other languages totaled 18.81%.

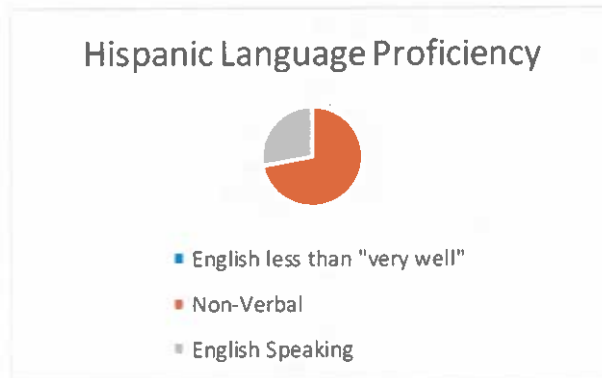
<b>Languages Served</b>	<b>Total Consumers Served by IRC</b>	<b>Total Consumers 22 &amp; Older</b>	<b>Percent</b>
<b>Total Clients Eligible for Service</b>	<b>39,582</b>	<b>10,837</b>	<b>100%</b>
<b>English Speaking</b>	<b>31,595</b>	<b>8,074</b>	<b>74.5%</b>
<b>Spanish Speaking</b>	<b>7,446</b>	<b>2,763</b>	<b>25.49%</b>

**Historical Analysis of LEP Persons Served by Life Skills Learn**

A final source of data to be considered to determine the number of Peppermint Ridge clients likely to be served is a client-by-client analysis. Peppermint Ridge serves approximately 100 persons during any given year. Of that total in 2021-2022, 9% were listed as Hispanic and 81% were listed as Caucasian. Other ethnicities made up less than 10% of the PR population. Over the last five years, the ethnic breakdown of Peppermint Ridge clients is very similar to the data reflected in 2021-2022.



In 2021-2022, eight clients were of Hispanic descent. In an analysis of the language proficiency of those eight, 28% (2 clients) spoke English "very well" and 72% (6 clients) were non-verbal due to their disability. There were **no clients** that spoke English less than "very well".



Additionally, clients of Peppermint Ridge who speak English or any other language less than "very well" typically have developmental disabilities that cause barriers to speaking at all. **Therefore, this clientele experiences limited English proficiency because of their developmental disabilities rather than their inability to speak English well. Because of their diminished mental capacity, they cannot read or write.** Thus, translation of vital documents into a native language is generally futile. When vital information needs to be communicated to clients it is done orally.

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An examination of consumers who have exited the program reveals that clients exited primarily because of their level of disability. There were no clients that were underserved or exited the program due to language barriers.

### **Factor 2: The frequency with which LEP persons come in contact with the Peppermint Ridge program, activity or service.**

As indicated above, historically, contact with LEP clients has not yet occurred at Peppermint Ridge. However, a survey of the agency's phone reception staff indicated calls from LEP persons are received a few times a year. The staff indicated that these calls are primarily received from people investigating job opportunities rather than clients (riders).

Annual client reviews provide an opportunity for input and suggested services. Requests by clients for translation services has occurred rarely, if ever, since most of the clients served are illiterate. In the event that a person who is visiting the campus needs translation, a Spanish speaking staff member would intercede and translate as necessary.

### **Factor 3: The nature and importance of program, activity or service provided by Peppermint Ridge to the LEP population.**

The primary purpose of Peppermint Ridge is to provide quality residential care to the individuals placed in its care. Transportation to medical appointments, community events and other activities is a vital to the agency's ability to deliver its mission. When asked, the residents say that one of the things they like best about The Ridge is the opportunity to do "fun things". As of November 2017, Peppermint Ridge serves 100 clients. The average tenure of a resident is about 14 years. In addition to providing quality care to Riders, This agency allows parents and family members to have peace of mind regarding a loved one. When a loved one is placed at Peppermint Ridge, family members are relieved from the day-to-day- responsibility of caring for a person with special needs. Knowing their loved ones are safe and happy allows family members to create an identity apart from being a caregiver.

Twenty residents have no active family in their lives. The staff and other residents are their family. The primary cause for a person's exit from Peppermint Ridge usually stems from a significant change in a client's medical or behavioral status.

### **Factor 4: The resources available to Peppermint Ridge for LEP outreach, as well as the costs associated with that outreach,**

The Peppermint Ridge operating budget is \$11 million and does not have a specific line item for providing language access and outreach since the population currently and historically served has a very low concentration of LEP persons as discussed in Factors 1 and 2. Costs for translation of documents is minimal and has not been quantified.

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General outreach efforts to promote the mission of The Ridge are conducted by the Executive Director, the Development Director and the Volunteer/Activities Coordinator in the day to day duties of their jobs. However, LEP populations are not specifically targeted. Peppermint Ridge pays a company about \$2,500 annually to manage its website and the contents therein. In the course of doing so the agency maintains current information related to Title VI requirements: The Notice to the Public, the Complaint Policy and a downloadable complaint form in both English and Spanish. If a staff member comes in contact with a family member who needs Spanish translation, there are enough bilingual staff available throughout the Ridge to accommodate this need in a timely manner. As more LEP persons come to live at The Ridge, appropriate accommodations will be made in the budget to meet these changing needs.

As outlined in the "Summary of Outreach Efforts" section of this document (page 12), Peppermint Ridge collaborates with a number of service clubs, City departments and business associations that serve LEP populations. These partnerships create a very low cost referral source for The Ridge and the entities as well.

### **SUMMARY**

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

- In 2021-2022 9 residents were identified as being of Hispanic descent
- No "true" LEP persons have been served by Peppermint Ridge in the last five years.
- Language proficiency is primarily affected by disability rather than a language barrier alone.
- No clients were underserved or exited the program due to language barriers.
- Surveyed Agency staff reported a few calls a year from LEP persons and those were seeking employment rather than Peppermint Ridge services.
- Providing transportation services to residents is vital to quality care but the resident's inability to speak does not hinder quality of service provided.
- Peppermint Ridge does not have an LEP specific budget line.
- Peppermint Ridge complies with the requirements outlined by Title VI.

## ***Language Assistance Implementation Plan***

### **Methodologies**

#### **Identifying LEP Individuals**

As evidenced by the Four Factor Analysis, very few "true" LEP individuals are referred to Peppermint Ridge. The predominant minority language in the region is Spanish. The clients that are primarily served by Peppermint Ridge have disabilities that affect

## Peppermint Ridge - Title VI Program

language proficiency rather than a language barrier alone. While there is a substantial minority population in the region, according to the RC Purchase of Service and Demographic Data Report, the funds allocated to the Hispanic language population is minimal. In the 14 year history of the program there were no consumers served who were LEP due strictly to a language barrier. The agency does, however, have systems in place to provide access to minority populations.

### **Providing Services**

While the agency does not currently have an on-going need for professional translation services, on-site agency staff who are fluent in Spanish provide translation services as needed. Documents that are offered in Spanish include:

- Title VI Notice to the Public
- Title VI Complaint Form
- Title VI Complaint Procedures
- Consumer Program Handbook including ABLE Grievance Policy
- Peppermint Ridge Title VI Plan

Other documents can be translated to Spanish orally as appropriate. Due to the low literacy rate of consumers at Peppermint Ridge, most documents are translated orally.

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

Individuals who are referred to Peppermint Ridge for services live in a home run by a Facility Manager. Facility Managers have access to Spanish translation services as needed. Agency reception staff can also provide translation services to guests and residents' family members on an as needed basis.

The Peppermint Ridge website will contain information about where to call if Spanish translation is needed to understand services provided by Peppermint Ridge.

### **Monitoring**

Peppermint Ridge will update the LEP Plan as required. At a minimum, the plan will be reviewed and updated when it is clear that a higher concentration of LEP individuals are present in the community at Peppermint Ridge.

### **Employee Training**

Peppermint Ridge conducts monthly In-Service training for staff on a variety of topics. Effective ways to communicate with clients who have limited language proficiency is discussed on a regular basis. Communication training is also conducted in each home to meet the specific communication needs of each resident residing there.

## **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, Peppermint Ridge serves individuals with moderate to severe developmental disabilities who require a high level of supervision. As such, the majority of clients have very limited literacy skills and are unable to read or write. Program documents are generally interpreted orally by staff members in each home.



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

Peppermint Ridge does not have a non-elected transit related advisory council at this time.

## **Title VI Equity Analysis**

Peppermint Ridge does not have transit related facilities.

**Board of Directors Approval of Peppermint Ridge's  
Title VI Program**

**A RESOLUTION OF THE PEPPERMINT RIDGE BOARD OF  
DIRECTORS AUTHORIZING THE TITLE VI COMPLIANCE PLAN  
FOR THE AGENCY.**

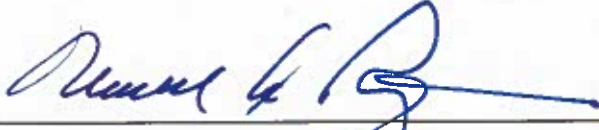
WHEREAS, Peppermint Ridge desires to comply with Title VI of the Civil Rights Act of 1964, including new provisions detailed in U.S. Department of Transportation's FTA Circular 4702.1B, "Title VI Requirement and Guidelines for Federal Transit Administration Recipients,"

WHEREAS, the Board of Directors wishes to authorize approval of the compliance plan developed by staff to comply with necessary provisions of the Civil Rights Act,

NOW, THEREFORE BE IT RESOLVED, by the Board of Directors of Peppermint Ridge as follows:

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

PASSED AND ADOPTED by the Board of Directors Peppermint Ridge in Riverside County, State of California, on this 24th day of January, 2023.

  
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**Michael Ryan, Chairman**