



VENTURA COUNTY  

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MEDICAL CENTER  
A Division of Ventura County Health Care Agency

## Title VI Program

Ventura County Health Care Agency (FTA Subrecipient)

March 2018

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## Background

The Federal Transit Administration (FTA) provides grants to local governments to create and enhance public transportation systems, investing more than \$11 billion annually to support and expand public transit services. One of those grants is known as Enhanced Mobility of Seniors & Individuals with Disabilities - Section 5310. This program (49 U.S.C. 5310) provides formula funding for the purpose of meeting the local transportation needs of older adults and people with disabilities when the transportation service provided is unavailable, insufficient, or inappropriate to meeting these needs. The program aims to improve mobility for seniors and individuals with disabilities by removing barriers to transportation service and expanding transportation mobility options. This program supports transportation services planned, designed, and carried out to meet the special transportation needs of seniors and individuals with disabilities. Eligible projects include both “traditional” capital investment and “nontraditional” investment beyond the Americans with Disabilities Act (ADA) complementary paratransit services. The 5310 grant program is managed by the California Department of Transportation (CDOT).

In 2017 the County of Ventura Health Care Agency applied for grant funding to provide non-emergency medical transportation for seniors and disabled adult patients after the local planning authority determined that this service was much needed by older and disabled transit dependent residents of Ventura County. The FTA 5310 grant program will fund approximately 400 non-emergency medical rides annually.

As a sub-recipient of FTA 5310 grant funding, the County of Ventura is required to develop and implement a Title VI program to ensure non-discrimination in the provision of transportation services.

## I. VCHCA Title VI Non-Discrimination Policy Statement

It is the policy of the County of Ventura Health Care Agency (HCA) that no person shall on the grounds of race, color or national origin be excluded from participation in, be denied the benefits of, or be subjected to discrimination in any operation of vehicles by transportation contractors as provided by Title VI of the Civil Rights Act of 1964 and FTA Circular C4702.18.

This policy also applies to the operations of any department or agency to which the County of Ventura Health Care Agency extends federal financial assistance. Federal financial assistance includes grants, training, use of equipment, donations of surplus property, and other assistance. The County of Ventura Health Care Agency will assure full compliance with the provisions of Title VI of the Civil Rights Act of 1964 and FTA Circular C4702.18 and has directed that non-discrimination is required of all agency employees, contractors and agents. A Title VI compliance clause is included in all transportation provider's contracts.

Prohibited discrimination may be intentional or unintentional. Seemingly neutral acts that have disparate impacts on individuals of a protected group and lack a substantial legitimate justification are a form of prohibited discrimination. Harassment and retaliation are also prohibited forms of discrimination.

Examples of prohibited types of discrimination based on race, color and national origin include: Denial to an individual any service, financial aid, or other benefit; Distinctions in the quality, quantity, or manner in which a benefit is provided; Segregation or separate treatment; Restriction in the enjoyment of any advantages, privileges, or other benefits provided; Discrimination in any activities related to highway and infrastructure or facility built or repaired; and Discrimination in employment.

Title VI compliance is a condition of receipt of federal funds. The Title VI Coordinator is authorized to ensure compliance with this policy.

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HCA Title VI Coordinator Signature

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Date

## II. VCHCA Organization, Staffing, and Structure

The County of Ventura Health Care Agency (HCA) is a department within the County government system that includes two hospitals, more than 60 primary and specialty care clinics, Behavior Health Department, Public Health, Animal Services and the Medical Examiner's Office. HCA's primary care clinics currently manage care for more than 105,000 patients and over 500,000 visits per year in addition to the more than 14,500 patients that are part of the Health Care for the Homeless program. The County of Ventura's health care system is a public "safety net" system that strives to enhance the provision of health care services in underserved urban and rural communities.

The County of Ventura Health Care Agency has appointed the HCA Grants Manager as the Title VI Coordinator who will ensure implementation of agency's Title VI program. The HCA Grants Manager position is located within the Ambulatory Care Department.

The Title VI Coordinator is responsible for:

- Submitting a Title VI plan and annual reports on the agency's behalf;
- Developing procedures for the prompt processing and disposition of complaints;
- Investigating complaints, compiling a complaint log;
- Ensuring public notice of rights under Title VI;
- Ensuring compliance with Title VI requirements;
- Establishing procedures for resolving Title VI complaints.

HCA operates a Community Health Center (CHC) and as such, primary care clinics are governed by a non-elected, voluntary board of community and health care consumer members. The CHC Board approves all programs and services provided at the primary care clinics, including the transportation program.

Ethnicity of the Ventura County CHC Board:

White Non-Hispanic	66%
Hispanic	20%
African American	7%
Pacific Islander	7%

The Ventura County Transportation Commission (VCTC) is the regional transportation agency responsible for oversight of the County's public transportation resources. There are consumer and provider advisory boards that operate under the authority of VCTC. To find out more about the ethnic make up of those non-elected advisory boards or for more information about VCTC and public transportation in Ventura County please see their website: <https://www.goventura.org>

### III. Title VI Complaint Procedures

Federal law requires that HCA investigate, track, and report discrimination complaints. To date, HCA has not received any complaints of Title VI violations. Complaints must be filed in writing and will be investigated within sixty days of submission. If you need assistance to file your complaint or need language interpretation services, please contact HCA Title VI Coordinator at 805-339-1103 or [susan.whitewood@ventura.org](mailto:susan.whitewood@ventura.org).

Who is eligible to file a complaint?

Anyone who believes they have been excluded from participation in, denied the benefits of, or otherwise subjected to discrimination under any County of Ventura Health Care Agency program or activity because of their race, color or national origin may file a complaint.

How do you file a complaint?

Complaints must be filed in writing within 180 days from the last date of the alleged discrimination. However, contact HCA Title VI Coordinator at 805-339-1103 or [susan.whitewood@ventura.org](mailto:susan.whitewood@ventura.org) (Agency's Title VI Coordinator) if you believe your complaint may fall outside this deadline. In accordance with Safe Harbor, all public notice and complaint forms are available in English and Spanish.

Reasonable efforts will be made to assist persons with disabilities, non-English speakers, and others unable to file a written complaint. For assistance in filing a complaint, please contact the County of Ventura Health Care Agency's Title VI Coordinator.

Complaints may be submitted via mail, email, or in person to:

HCA Grants Manager  
Hall Administration, L#4615  
800 South Victoria Avenue  
Ventura, California 93009  
805-339-1103  
[Susan.whitewood@ventura.org](mailto:Susan.whitewood@ventura.org)

OR

Federal Transit Administration  
Office of Civil Rights  
Attention: Complaint Team  
East Building, 5th Floor – TCR  
1200 New Jersey Avenue, SE  
Washington, DC 20590

What happens after a complaint is filed?

Title VI complaints must be investigated within sixty days. Investigating a complaint includes interviewing all parties involved and key witnesses. The investigator may also request relevant information such as books, records, electronic information, and other sources of information from all involved parties. You may specify if there is a particular individual or individuals that you feel should not investigate your complaint due to conflict of interest or other reasons.

Federal law prohibits retaliation against individuals because they have filed a discrimination complaint or otherwise participated in a discrimination investigation. Any alleged retaliation should be reported in writing to the investigator.

#### IV. Title VI Complaint Form

Please complete this form to the best of your ability. If you need translation or other assistance, contact the Title VI Coordinator at (805) 339-1103.

Name \_\_\_\_\_  
Address \_\_\_\_\_ City \_\_\_\_\_ Zip \_\_\_\_\_  
Phone: Home \_\_\_\_\_ Work \_\_\_\_\_ Mobile \_\_\_\_\_  
Email: \_\_\_\_\_

Basis of Complaint (Check all that apply):       Race       Color       National Origin

#### ***Who discriminated against you?***

Name \_\_\_\_\_  
Name of Organization \_\_\_\_\_  
Address \_\_\_\_\_ City \_\_\_\_\_ Zip \_\_\_\_\_  
Telephone \_\_\_\_\_

*How were you discriminated against? (Attach additional pages if more space is needed)*

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

*Where did the discrimination occur?* \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

*Dates and times discrimination occurred?* \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

*Were there any other witnesses to the discrimination?*

Name	Organization/Title	Work Telephone	Home Telephone

*How would you like to see this situation resolved?*

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*Have you filed your complaint, grievance, or lawsuit with any other agency or court?*

Who \_\_\_\_\_ When \_\_\_\_\_

Status (pending, resolved, etc.) \_\_\_\_\_ Result, if known \_\_\_\_\_

Complaint number, if known \_\_\_\_\_

*Do you have an attorney in this matter?*

Name \_\_\_\_\_ Phone \_\_\_\_\_

Address \_\_\_\_\_ City \_\_\_\_\_ Zip \_\_\_\_\_

Signed \_\_\_\_\_

Date \_\_\_\_\_

## V. Public Participation and Limited English Proficiency Plan

HCA conducts public outreach through its vast network of health care services. All patients seen at County clinics and hospitals are notified of the services available to them and their rights under Title VI. Outreach is conducted through bilingual public postings, community health fairs, public service announcements, fliers and word of mouth by service providers. There are signs posted at every clinic within the County's system that notifies the public of their language rights and resources. HCA assumes the cost of all outreach activities for patient transportation. Employees at both hospitals and all of the ambulatory care clinics are trained to offer language services to all patients and language access compliance is monitored quarterly through the environment of care rounds required by the Joint Commission. 35% of the HCA patient population speaks a language other than English, 12% are over the age of 60 and 67% of the patient population are low-income and, therefore, more likely to use public transportation.

### Four Factor Analysis

Factor 1: based on information found in the American Community Survey, 2012-2016 Estimates, Table B16001 Ventura County complies with Safe Harbor 5% threshold. Factor 2: the frequency that patients will come into contact with the 5310 transportation program is limited by the amount of FTA grant funding available. HCA is scheduled to provide 400 rides annually under the current grant cycle. Factor 3: the proposed project does not include any construction or facility costs. Factor 4: the benefits and importance of public transportation impact everyone, even those who may never board a train or bus, and Americans understand its value—so much so that people are willing to tax themselves, if needed, to expand public transportation services. In recent years, voters around the country overwhelmingly passed local public transportation ballot measures. Public transportation is critical to our nation's transportation system and is essential to the economic and social quality of life. Although non-emergency medical transportation (NEMT) is a mandatory Medicaid benefit, states can limit its availability through federal waivers. As Medicaid enters a period of unprecedented experimentation and, potentially, reduced federal resources, NEMT remains a critical feature of the program. Based on the above Four-Factor Analysis, HCA will make all reasonable attempts to accommodate language access needs of residents requesting oral translation during citizen participation activities.

## VI. Public Notice of Rights

HCA is committed to serving the public and provides services directed at Limited English Populations at all its clinics. The following Title VI public notice has been posted in English and Spanish on the HCA website (<https://www.vchca.org>), at its hospitals and ambulatory care clinics, and has been provided to the transportation contractors for posting in their vehicles:

**Your Rights Against Discrimination under Title VI of the Civil Rights Act of 1964**

***PUBLIC NOTICE UNDER TITLE VI***

***VENTURA COUNTY HEALTH CARE AGENCY***

Ventura County Health Care Agency operates its programs and services without regard to race, color and national origin. Anyone who believes they have been excluded from participation in, denied the benefits of, or otherwise subjected to discrimination under any County of Ventura Health Care Agency program or activity because of their race, color or national origin may file a discrimination complaint.

To file a Title VI discrimination complaint contact:

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