

# **Got Wheels San Mateo, CA**

## **TITLE VI PROGRAM**

**Developed: February 16, 2023**

**Cherie Querol Moreno, Got Wheels! Manager  
24 Second Ave.  
San Mateo, CA 94401**

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**[www.pfso.org](http://www.pfso.org)**

### **INTRODUCTION**

This document was prepared by Got Wheels, San Mateo, CA, 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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## **Got Wheels! - Title VI Notice to the Public**

### **Notifying the Public of Rights Under Title VI**

## **Got Wheels!**

- Got Wheels! 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 the Chief Executive Officer of Got Wheels!.
- For more information on Got Wheels! civil rights program, and the procedures to file a complaint, contact Cherie Querol Moreno, or visit our administrative office at 24 Second Ave, San Mateo, CA 94401. For more information, visit [www.pfso.org](http://www.pfso.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: Cherie Querol Moreno [cqmoreno@pfso.org](mailto:cqmoreno@pfso.org)

## Notificar al público de los derechos bajo el título VI **Got Wheels!**

- Got Wheels! 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 Chief Executive Officer, Got Wheels!
- Para obtener más información sobre el programa derechos civiles capaz de industrias y el procedimientos para presentar una queja, llame al Cherie Querol Moreno o visite nuestra oficina administrativa en 24 Second Ave, San Mateo, CA 94401. Para más información información, visite [www.mobilitymatterscc.com](http://www.mobilitymatterscc.com)
- 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, 20590

## **List of Locations Where Title VI Notice Is Posted**

The Got Wheels! notice to the public is currently posted at the following locations:

Location Name	Address	City
Peninsula Family Service	24 Second Ave	San Mateo

The Title VI notice and program information is also provided on Got Wheels! website at <https://www.peninsulafamilyservice.org/our-programs/older-adult-services/>. The email address is: [cqmoreno@pfso.org](mailto:cqmoreno@pfso.org).

## **Title VI Complaint Procedures**

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

Within 10 business days of receiving the complaint, Got Wheels! 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. The Got Wheels! 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, Got Wheels! or the Chief Executive Officer 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, Got Wheels! or the Chief Executive Officer 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.

## Got Wheels! Title VI Complaint Form

<b>Section I: Please write legibly</b>		
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
<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 <i>(check all that apply)</i> :		
<input type="checkbox"/> Race Origin	<input type="checkbox"/> Color	<input type="checkbox"/> National
12. Date of alleged discrimination: <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) 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.		

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<b>Section IV:</b>		
14. Have you previously filed a Title VI complaint with Got Wheels!?	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 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:

Got Wheels!

24 Second Ave, San Mateo, CA 94401



## Titulo VI Procedimiento de Queja

Como un receptor de dólares federales, Got Wheels! 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. Got Wheels! 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 Got Wheels! puede presentar al Titulo VI su denuncia. Got Wheels! investiga las quejas no mas de 180 días después del incidente. Got Wheels!. Solo tramitara las quejas que están completas.

En un periodo de 10 días de haber recibido la demanda, Got Wheels! 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. Got Wheels! tiene 30 días para investigar la queja.

Si necesita mas información para resolver el caso, Got Wheels! or the Chief Executive Officer. 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.

Got Wheels!  
Titulo VI FORMA DE QUEJA

<b>Seccion I: <i>Escribir en forma legible</i></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> ):		
<div style="display: flex; justify-content: space-around; align-items: flex-start;"> <div><input type="checkbox"/> Raza</div> <div><input type="checkbox"/> Color</div> <div><input type="checkbox"/> Origin nacional</div> </div>		
12. Fecha de supuesta discriminacion: ( <i>mm/dd/aaaa</i> )		

13. Explica lo mas claramente posible lo que ocurrio y por que usted cree que son objeto discriminacion. Describir todas las personas que han participado. Incluir el nombre y la informacion de contacto de la(s) persona(s) que discrimina contra usted (si se conoce), asi como los nombres y la informacion de contacto de los testigos. Si se necesita mas espacio, por favor adjunte hojas adicionales de papel.

**Seccion IV:**

14. Anteriormente ha presentado un Titulo VI denuncia con Got Wheels!.	Si	No
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**Seccion V:**

15. Ha presentado esta queja con cualquier otro local, estado o federal, o con cualquier Federal o Estado?

☐ Si\*    ☐ No si la respuesta es si

Marque todo lo que aplica

☐ Agencia Federal \_\_\_\_\_ ☐ Agencia Estatal \_\_\_\_\_

☐ Federal Tribunal \_\_\_\_\_ ☐ Agencia Local \_\_\_\_\_

☐ Tribunal Estatal \_\_\_\_\_

16. Si usted contesto "si" a la posicion #15, proporcionan informacion acerca de una persona de contacto en la agencia/tribunal donde se presento la denuncia.

Nombre:

Titulo:

Organismo:

Direccion:

Telefono:

Correo electronico:

**Seccion VI:**

Nombre de organismo Transito denuncia es contra:

Persona de contacto:

Telefono:

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

Peninsula Family Service and Got Wheels! have never been involved in any transportation-related Title VI investigations, lawsuits, or complaints.

### **Got Wheels! List of Investigations, Lawsuits and 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**

Public Participation Plan that includes an outreach plan to engage BIPOC and limited English proficient populations as well as a summary of outreach efforts made since the last Title VI Program submission. This may include other constituencies that are traditionally underserved, such as people with disabilities, low-income populations, and others.

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Peninsula Family Service, is a 501(c)(3) agency, provides mobility management services in San Mateo County that primarily address the mobility of older adults, individuals with disabilities, and low-income individuals. In addition to our transportation service, we do provide information and referral assistance for other transportation resources. We directly provide rides through our partnership with Serra Yellow Cab that covers twelve communities in San Mateo County.

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 intent of Got Wheels! to enable older adults and veterans to age in place safely and comfortably by providing transportation services, information and referrals that match them to appropriate transportation providers; and offer opportunities for older adults, veterans, and others who care about aging issues to become agents of change for our communities. Annually a survey is mailed out to all Got Wheels! clients and volunteers to solicit direct input on how we're doing.

## ***Summary of Outreach Efforts***

The following is a summary of outreach efforts conducted by Got Wheels! 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 BIPOC and low-income populations.

- We distribute our brochures all over the county where older adults and veterans with disabilities gather.
- We write articles and are interviewed for articles about older adults and veteran transportation issues that are published in local papers and online.
- Transportation flyers are on display at older adult events and at community events in which we are asked to participate.
- Agency staff participates in the San Mateo County Commission on Aging and the Commission on Aging Transportation Workgroup. Both the Commission on Aging and the Transportation subgroup work tirelessly to provide education and outreach to all segments of San Mateo County.
- Agency staff attends and participates in regional coalitions to make our services available to a diverse group of older adults and gather opportunities to serve others.
- Got Wheels! makes presentations to the City Council meetings, local Rotary Clubs, Kiwanis, Lions, etc. and supports their efforts to provide services to older adults. We also go beyond traditional organizations to engage hard-to-reach groups such as LGBTQ+, immigrant, and BIPOC communities.
- Got Wheels! conducts annual satisfaction surveys with program participants and stakeholders of the agency to determine level of satisfaction and gain input regarding unmet needs.

## 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 Got Wheels! programs and services.
- **Factor 2:** The frequency with which LEP persons come in contact with the Got Wheels! programs and services.
- **Factor 3:** The nature and importance of programs and services provided by the Got Wheels! to the LEP population.
- **Factor 4:** The resources available to the Got Wheels! and 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."

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. The Got Wheels! language assistance plan (LAP) includes a four-factor analysis and implementation plan that complies with the requirements of DOT LEP guidance.



## Four Factor Analysis Got Wheels!

**Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by Got Wheels!.**

Got Wheels! holds a unique position in regard to meeting the Title VI requirements. As a recipient of FTA 5310 Grant funding, Peninsula Family Service's, Got Wheels! Program's focus is primarily to transport older adults and veterans, most having age-based disabilities where current public transit options are insufficient or do not exist.

The population for San Mateo County totals 737,888 (2021 U.S. Census estimates), with 334,263 speaking a language other than English at home.

Characteristic	Percent of Population
Population 65 and older	17.6%
Language other than English of total population	45.3%

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

Historically, contact with LEP consumers does not occur in this program. We have had very few limited English-speaking Latino or Chinese passengers who have used our service so far. The Program Manager is bilingual in English-Tagalog and is fluent in Spanish. Since the rides will be provided by Serra Yellow Cab, someone within the household who speaks English will have to assist the member in scheduling the ride. We don't want someone's ability to speak English to ever deny them access to services. We can also provide assistance for callers by connecting them to a PFS staff member who speaks their language for assistance.

Annual consumer surveys provide an opportunity for input and suggested services. Surveys have not resulted in requests for translation services.

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

We work with Serra Yellow Cab Service transportation services that serve San Mateo County. We respond to callers to our GotWheels! Program, to assist them in applying to the program. We give them a thorough orientation to the program so that they understand how to arrange the appropriate transportation that meets their individual mobility needs. We convene and attend meetings with transportation and related providers of older adult and veteran services on issues of mutual concern, participate on standing committees including the Age Forward Coalition, The Commission on Aging, Daly City Access to name a few.

Although most of our ride program clients qualify for paratransit, their inability to ambulate safely without at least standby/elbow assistance door-through-door, and having no one to escort them on a paratransit van trip precludes them from taking it.

There are older adults and disabled veterans who are unable to get where they need to go (remain homebound) without the services we provide. Without our services, they risk poor health, low quality of life, early long term institutional placement or even premature death.

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

- Got Wheels! tries to accommodate as many clients as possible. We share brochures and flyers with the cost being approximately \$600

**SUMMARY**

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

- No consumers were underserved or exited the program due to language barriers.
- Got Wheels! Has LEP specific budget line of \$600
- The Got Wheels! spends less than \$5,000 per year on all outreach efforts.

## **Language Assistance Implementation Plan – Got Wheels!**

### ***Methodologies/Providing Services/Communicating Availability of Language Assistance***

- If a mono-lingual person's family member/friend/care giver calls us, we work with that person to make their mono-lingual family member/friend/client feel welcome and able to use our transportation services.
- We have PFS staff members from other programs in the community we call on to translate for mono-lingual passengers when necessary
- We continue to reach out to low-income senior residents so they become acclimated to using our service. If they are limited English speaking, we ask their friends or family members to help interpret.

### **Monitoring**

- Staff report challenging member circumstances including language barriers and needs to the Chief Program Officer. To date, our staff has been able to communicate with members and prospective members.
- Annual Satisfaction Surveys for the Got Wheels! program offer an opportunity for consumers to provide input or suggest additional services. To date, translation services have not been requested.
- Members often express appreciation verbally or in writing about our service and staff for the way we go above and beyond.

### **Employee Training**

- As part of the Accessibility Plan, the Program Manager works with staff of multiple older adult service providers to promote the use of the program and to learn more about their residents' needs and challenges and to develop strategies for resolving any challenges.
- Got Wheels! staff periodically make presentations at senior housing complexes to promote ridership. Communication has been open and comfortable. Those with strong English skills translate as needed.
- The Chief Program Officer trains staff routinely and as situations arise.
- Staff members are encouraged to attend community educational events such as symposiums where information on a variety of topics is provided.

## **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."*

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

Got Wheels! does not have a non-elected committee.

## **Title VI Equity Analysis**

Got Wheels! does not have transit-related facilities.

## **Board of Directors Approval of Peninsula Family Service Title VI Program**

### **A RESOLUTION OF THE PENINSULA FAMILY SERVICE BOARD OF DIRECTORS AUTHORIZING THE TITLE VI COMPLIANCE PLAN FOR THE AGENCY.**

WHEREAS, Peninsula Family Service 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 Peninsula Family Service 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 of Peninsula Family Service, State of California, on this 28th day of February, 2023.



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**Ron Lynch**  
**Board Chair**