

**TITLE VI PLAN**

**Approved by**

**Radiant Health Centers’**  **Board of Directors on June 17, 2014**

**Radiant Health Centers
17982 Sky Park Circle, Suite J**

**Irvine, CA 92614 (949) 809-570**

 **www.radianthealthcenters.org**

This document was prepared by Radiant Health Centers 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.”

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**Radiant Health Centers
Title VI Notice to the Public**

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| Notifying the Public of Rights under Title VI  Radiant Health Centers  Radiant Health Centers 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 Radiant Health Centers.   For more information on Radiant Health Centers’ civil rights program, and the procedures to file a complaint, contact (949) 809-5700 or visit our office at 17982 Sky Park Circle, Suite J. Additional information can be found at www.radianthealthcenters.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 (949) 809-5700.  |



**Notificación al Público de el Título VI de**

**Radiant Health Centers**

|  |
| --- |
| Notificación al público de los derechos bajo el título VI  Radiant Health Centers  Radiant Health Centers opera sus programas y servicios sin respeto 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 Radiant Health Centers.   Para obtener más información sobre el programa de derechos civiles y los procedimientos para presentar una queja, llame al (949) 809-5700 o visite nuestra oficina en 17982 Sky Park Circle, Suite J, Irvine, CA 92614. Para más información, visite www.radianthealthcenters.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 (949) 809-5700.  |

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

Radiant Health Centers’ Title VI notice to the public is currently posted at the following locations:

|  |  |  |
| --- | --- | --- |
| Location Name  | Address  | City  |
| Radiant Health Centers - Lobby – Reception desk  | 17982 Sky Park Circle, Suite J  | Irvine, CA 92614  |
| Radiant Health Centers - Transportation Dept. Vehicles  | 17982 Sky Park Circle, Suite J  | Irvine, CA 92614  |
|  Radiant Health Centers – Meeting rooms | 17982 Sky Park Circle, Suite J  | Irvine, CA 92614  |

The Title VI notice and program information is also provided on Radiant Health Centers’ website at: www.radianthealthcenters.org.

## Title VI Complaint Procedures

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

Within 10 business days of receiving the complaint, Radiant Health Centers 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. Radiant Health Centers 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, Radiant Health Centers 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, Radiant Health Centers 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.

**Título VI Procedimientos de Quejas**

Como beneficiario de fondos federales, Radiant Health Centers está obligado a cumplir con el Título VI del Acta de Derechos Civiles de 1964 y asegurar que los servicios y los beneficios se proporcionan sobre un base sin discriminación. Radiant Health Centers tiene establecido un Procedimiento de Quejas del Título VI, que describe un proceso para la disposición local de las quejas del Título VI y es coherente con las directivas que se encuentran en la Circular de Administración Federal de Tránsito, 4702.1B, de fecha 1 de Octubre de 2012.

Cualquier persona que cree que él o ella ha sido víctima de discriminación en base a raza, color, o el origen nacional por Radiant Health Centers, puede presentar una queja del Título VI, completando y enviando el Formulario de Quejas del Título VI de la agencia. Radiant Health Centers investiga las quejas recibidas no más tardar 180 días después del supuesto incidente. Radiant Health Centers únicamente tratará las quejas que estén completos.

Dentro de 10 días de haber recibido la queja, Radiant Health Centers revisará para determinar si nuestra oficina tiene jurisdicción. El demandante recibirá una carta de acuse de recibo informando a él/ella si la queja será investigada por nuestra oficina. Radiant Health Centers tiene 30 días para investigar la denuncia. El demandante será notificado por escritura de la causa a cualquier ampliación prevista de la norma de los 30 días.

Si se necesita más información para resolver el caso, Radiant Health Centers puede ponerse en contacto con el demandante. El demandante tiene 10 días hábiles desde la fecha de la carta para enviar la información solicitada para el investigador asignado al caso. Si el investigador no está en contacto con el reclamante o no reciba la información adicional dentro de los 10 días hábiles, Radiant Health Centers puede, administrativamente, cerrar el caso.

Un caso puede ser cerrado administrativamente, también, si el demandante ya no desea seguir su caso. Después de que el investigador revisa la queja, él/ella va a emitir una de dos cartas al demandante: un aviso de cierre del caso, o un aviso de conclusiones (LOF). El aviso de cierre resume los hechos denunciados, y afirma que no hubo una violación del Título VI, y que el caso se cerrará. Un LOF resume los hechos denunciados y las entrevistas sobre el supuesto incidente y explica si alguna acción disciplinaria, entrenamiento adicional del miembro del personal, u otra acción será ocurrir. Si el demandante desea apelar la decisión, 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 Federal Transit

Adminstration, al FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.



 **Title VI Complaint Form**

|  |
| --- |
| **Section I: *Please write legibly***   |
| 1. Name:  |
| 2. Address:  |
| 3. Telephone:  | 3.a.Secondary Phone *(Optional):*   |
| 4. Email Address:  |
| 5. Accessible Format Requirements?  | [ ] Large Print  | [ ] Audio Tape  |
| [ ] TDD  | [ ] 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 *(check all that apply):*  **[ ] Race [ ] Color [ ] National Origin**   |
| 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.       |

## Title VI Complaint Form

|  |
| --- |
| **COMPLAINT FORM Section IV:**   |
| 14. Have you previously filed a Title VI complaint with Radiant Health Centers? | 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? [ ] 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:  |
| **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 Date

(Signature and date are required below to complete form)

Please submit this form in person or mail this form to:

Director of Support Services

Radiant Health Centers

17982 Sky Park Circle, Suite J. Irvine, CA 92614



**Título VI Formulario de Quejas**

|  |
| --- |
| **Seccíon I: *Por favor, escriba de manera legible***   |
| 1. Nombre:  |
| 2. Domicílio:  |
| 3. Teléfono:  | 3.a.Teléfono Secundario *(Opcíonal):*   |
| 4. Direccíon de Email:  |
| 5. ¿Requisitos en formato accesible?  | [ ] Letra Grande  | [ ] Cinta de Audio  |
| [ ] TDD  | [ ] Otra  |
| **Section II:**   |
| 6 ¿Está usted presentando esta queja en su propio nombre?  | SI\*  | NO  |
| \* Si usted contestó "sí" al # 6, pase a la Sección III.  |
| 7. Si su respuesta es "no" a la # 6, ¿cuál es el nombre de la persona a quien usted esta representando esta queja? Nombre:  |
| 8. ¿Cuál es su relación con esta persona?:  |
| 9. Por favor, explique por qué usted ha presentado para un tercero:  |
| 10. Por favor, confirme que ha obtenido el permiso de la parte agraviada para presentar en su nombre.  | SI  | NO  |
| **Section III:**   |
| 11. Creo que la discriminación que sufrí fue basada en *(marque todo lo que corresponda)*: **[ ] Raza [ ] Color [ ] Origen Nacional**   |
| 12. Fecha de la supuesta discriminación: *(dd / mm / aaaa)*   |
| 13. Explique lo más claramente posible lo que ocurrió y por qué cree que fue discriminado. Describe todas las personas que estuvieron involucradas. Incluya el nombre y la información de contacto de la persona(s) que lo discriminó (si se conoce), incluye los nombres e información de cualquier testigo. Si se necesita más espacio, adjunte hojas adicionales.  |

## Título VI Formulario de Quejas

|  |
| --- |
| **FORMULARIO DE QUEJA Sección IV:**  |
| 14. Ha presentado anteriormente una queja del Título VI con Radiant Health Centers?  | SI  | NO  |
| **Sección V:**   |
| 15. ¿Ha presentado esta queja con cualquier otra agencia federal, estatal o local, o ante cualquier tribunal federal o estatal? [ ] SI\* [ ] NO En caso que si, marque todo lo que corresponda: [ ] Agencia Federal \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ [ ] Agencia Estatal \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ [ ] Tribunal Federal \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ [ ] Agencia Local \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ [ ] Tribunal Estatal \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_  |
| 16. Si usted contestó "sí" a la # 15, proporcione información acerca de una persona de contacto en la agencia / tribunal en donde se presentó la queja.  |
| Nombre:  |
| Título:  |
| Agencia:  |
| Dirección:  |
| Teléfono: Correo electrónico:  |
| **Sección VI:**   |
| Nombre de la queja es contra la Agencia de Tránsito:  |
| Persona de Contacto:  |
| Teléfono:  |

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

Firma Fecha

(Firma y fecha son necesarias para completar el formulario)

Por favor envíe este formulario en persona o por correo a:

Director of Support Services

Radiant Health Centers

17982 Sky Park Circle, Suite J. Irvine, CA 92614

**List of Transit‐Related Title VI Investigations, Complaints, and Lawsuits**

Radiant Health Centers 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  |  |  |  |  |
| 2.  |  |  |  |  |
| **Lawsuits**  |  |  |  |  |
| 1. None  |  |  |  |  |
| 2.  |  |  |  |  |
| **Complaints**  |  |  |  |  |
| 1. None  |  |  |  |  |
| 2.  |  |  |  |  |

## Public Participation Plan

### 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 prevent the spread of HIV and improve the lives of men, women and children affected by HIV/AIDS in Orange County. 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.

### Outreach Plan

As the most comprehensive community based HIV/AIDS organization in Orange County for over 32 years, Radiant Health Centers receives most its referrals as a result of well-established relationships with clinics, doctors, hospitals, test sites, prevention programs, and other community providers. In addition, Radiant Health Centers makes many intra-agency referrals to meet the needs of existing clients, which further strengthens relationships and promotes awareness of our services.

Radiant Health Centers also pro-actively “markets” its services in both English and Spanish in a variety of ways. (1) Each client receives a client handbook, which is regularly updated, which promotes our programs. (2) We hold weekly Life Skills workshops which helps clients understand and access our services. (3) Issues of The Voice -- the agency’s bimonthly newsletter -- lists our services and has program related features. It has a circulation of over 4,000 and reaches a diverse readership that includes clients, donors, volunteers, and others interested in HIV/AIDS in Orange County. (4) Radiant Health Centers publishes agency and program brochures including a detailed HIV Housing brochure and Housing Resource Guide, an annual report, and maintains a website at www.radianthealthcenters.org. (5) Radiant Health Centers staff provides in-service trainings at medical and mental health clinics. Staff, clients, and volunteers participate in community events, health fairs, and workplace education forums. Housing staff members, including Radiant Health Centers’ Housing Supervisor who is recognized as the HIV Housing expert in the community, attend many community meetings including the HIV Housing Committee, Homeless Provider Forum, HOPWA Strategy Planning Meeting, OC Continuum of Care meetings – Information is given at these meetings, as well as giving out the Housing Brochures and Housing Resource Guides. Through our Speakers Bureau, clients go into the community to discuss HIV issues and resources. (6) Radiant Health Centers regularly advertises in local newsmagazines for the gay community, and is listed in all county Yellow Pages. (7) Our communications staff works with The Orange County Register, Los Angeles Times, and local newsmagazines to develop HIV-related stories that include agency information. (8) In addition to its importance as a fundraiser, AIDS Walk Orange County is an invaluable way to promote awareness of HIV as a serious health problem and of the community

### Radiant Health Centers Website

Currently, Radiant Health Centers posts notices and announcement on the agency's website, www.radianthealthcenters.org. Additional public input can be obtained by the Title VI Complaint Form, which is available as a download in English and Spanish.

### Annual Satisfaction Surveys and Needs Assessments

Radiant Health Centers conducts an annual Client Survey Surveys with program participants to determine level of satisfaction, gain input regarding unmet needs and track outcome measurements for the agency’s Quality Management Plan. The Orange County Health Care Agency (OCHCA) HIV Planning and Coordination coordinates distribution of a biannual Ryan White Client Satisfaction Survey and bi-annual HIV Needs Survey with all HIV service providers in the County. All of these are offered in English and Spanish.

## Limited English Proficiency (LEP) Plan

### Purpose

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. Radiant Health Centers’ Limited English Proficiency Plan includes a four factor analysis and implementation plan that complies with the requirements of DOT LEP guidance.

### Four Factor Analysis

In order to ensure meaningful access to programs and activities, information obtained in the Four Factor Analysis will be used to determine the specific language services that are appropriate for Radiant Health Centers to provide. The Four Factor Analysis is an individual assessment that balances the four factors:

**Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by Radiant Health Centers.**

Radiant Health Centers 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 HIV positive individuals with disabilities who feasibly cannot access Orange County’s public transit options. Eligible participants or "riders" must be referred into the program from an Radiant Health Centers or other Orange County HIV service provider case manager. HIV positive individuals not on case management can self-refer to the program. Radiant Health Centers does not offer transportation to the general public. Therefore, an analysis of public demographic data in Orange County shown in the following External Source #1 does not represent actual populations served by this program but is offered for comparison purposes only.

### External Source #1 – U.S. Census Bureau

Table 1 represents the racial break-down of Orange County according to the 2010 U.S. Census Bureau.

### Table 1: Orange County Racial Break-Down Total Population 3,010,232

|  |  |  |
| --- | --- | --- |
| **Race**  | **Total Population**  | **Population %**  |
| White – Non-Hispanic  | 1,328,499  | 44.10%  |
| Black  | 50,744  | 1.70%  |
| American Indian  | 18,132  | 0.60%  |
| Asian  | 537,804  | 17.90%  |
| Pacific Islander  | 9,354  | 0.30%  |
| Hispanic  | 1,012,973  | 33.70%  |

Source: 2010 U.S. Census/2010 County of Orange Report on Race and Ethnicity.

Less than 1.8% of population is equal to persons of two or more races

The total population 5 years of age and older who speak English at home is 2,827,013 or 93.6% of Orange County’s total population. The percentage of the Orange County population 5 years of age and older who speak English less than “very well’ or “not at all” is approximately 604,854 persons or 21.4% of the population.

Table 2 represents the LEP speakers by language and the percentage of LEP persons in Orange County who meet the Department of Justice (DOJ) Safe Harbor provision of “every 1,000 speakers or five percent of the population whichever is less.”

**Table 2: LEP Speakers by Language in Orange County (Safe Harbor Provision) Total Population 2, 979,091 Age 4 Years and Older**

|  |  | **Orange County, California** |
| --- | --- | --- |
|  | **Estimate** | **Margin of Error** |
| **https://factfinder.census.gov/common/img/1px.gif https://factfinder.census.gov/common/img/1px.gif https://factfinder.census.gov/common/img/1px.gif** |  | **https://factfinder.census.gov/common/img/1px.gif move this column to the right** | **move this column to the left https://factfinder.census.gov/common/img/1px.gif** |
| **collapse this category Total:** |  | 2,979,091 | +/-330 |
| **Speak only English** |  | 1,603,695 | +/-16,628 |
| **collapse this category Spanish or Spanish Creole:** |  | 770,338 | +/-12,393 |
| **Speak English less than "very well"** |  | 332,344 | +/-10,066 |
| **collapse this category French (incl. Patois, Cajun):** |  | 10,027 | +/-2,103 |
| **Speak English "very well"** |  | 8,152 | +/-1,811 |
| **collapse this category French Creole:** |  | 44 | +/-72 |
| **Speak English "very well"** |  | 0 | +/-201 |
| **collapse this category Italian:** |  | 3,467 | +/-933 |
| **Speak English "very well"** |  | 2,819 | +/-843 |
| **collapse this category Portuguese or Portuguese Creole:** |  | 4,280 | +/-1,824 |
| **Speak English "very well"** |  | 3,291 | +/-1,507 |
| **collapse this category German:** |  | 9,924 | +/-1,943 |
| **Speak English "very well"** |  | 8,917 | +/-1,915 |
| **collapse this category Yiddish:** |  | 644 | +/-904 |
| **Speak English "very well"** |  | 457 | +/-606 |
| **collapse this category Other West Germanic languages:** |  | 1,992 | +/-733 |
| **Speak English "very well"** |  | 1,780 | +/-700 |
| **collapse this category Scandinavian languages:** |  | 1,252 | +/-819 |
| **Speak English "very well"** |  | 1,105 | +/-751 |
| **collapse this category Greek:** |  | 2,707 | +/-1,172 |
| **Speak English "very well"** |  | 2,249 | +/-910 |
| **collapse this category Russian:** |  | 7,709 | +/-2,160 |
| **Speak English "very well"** |  | 4,911 | +/-1,390 |
| **collapse this category Polish:** |  | 2,461 | +/-1,061 |
| **Speak English "very well"** |  | 1,770 | +/-772 |
| **collapse this category Serbo-Croatian:** |  | 666 | +/-397 |
| **Speak English "very well"** |  | 335 | +/-302 |
| **collapse this category Other Slavic languages:** |  | 1,494 | +/-797 |
| **Speak English "very well"** |  | 1,199 | +/-660 |
| **collapse this category Armenian:** |  | 2,150 | +/-791 |
| **Speak English "very well"** |  | 1,582 | +/-745 |
| **collapse this category Persian:** |  | 36,041 | +/-6,267 |
| **Speak English "very well"** |  | 22,074 | +/-4,965 |
| **collapse this category Gujarati:** |  | 8,280 | +/-2,741 |
| **Speak English "very well"** |  | 5,497 | +/-1,830 |
| **collapse this category Hindi:** |  | 11,882 | +/-3,323 |
| **Speak English "very well"** |  | 9,812 | +/-3,150 |
| **collapse this category Urdu:** |  | 7,421 | +/-2,978 |
| **Speak English "very well"** |  | 5,724 | +/-2,433 |
| **collapse this category Other Indic languages:** |  | 13,026 | +/-3,803 |
| **Speak English "very well"** |  | 9,308 | +/-2,853 |
| **collapse this category Other Indo-European languages:** |  | 5,182 | +/-1,543 |
| **Speak English "very well"** |  | 3,509 | +/-1,337 |
| **collapse this category Chinese:** |  | 86,961 | +/-7,996 |
| **Speak English "very well"** |  | 41,057 | +/-4,467 |
| **collapse this category Japanese:** |  | 18,784 | +/-4,003 |
| **Speak English "very well"** |  | 8,648 | +/-2,182 |
| **collapse this category Korean:** |  | 77,506 | +/-8,999 |
| **Speak English "very well"** |  | 35,260 | +/-5,811 |
| **collapse this category Mon-Khmer, Cambodian:** |  | 7,318 | +/-2,545 |
| **Speak English "very well"** |  | 4,273 | +/-1,815 |
| **collapse this category Hmong:** |  | 988 | +/-739 |
| **Speak English less than "very well"** |  | 396 | +/-307 |
| **collapse this category Thai:** |  | 3,918 | +/-1,662 |
| **Speak English "very well"** |  | 1,774 | +/-716 |
| **collapse this category Laotian:** |  | 1,895 | +/-966 |
| **Speak English "very well"** |  | 939 | +/-576 |
| **collapse this category Vietnamese:** |  | 168,868 | +/-8,915 |
| **Speak English "very well"** |  | 67,864 | +/-5,473 |
| **collapse this category Other Asian languages:** |  | 12,311 | +/-2,688 |
| **Speak English "very well"** |  | 9,322 | +/-2,262 |
| **collapse this category Tagalog:** |  | 51,391 | +/-5,924 |
| **Speak English "very well"** |  | 37,095 | +/-4,617 |
| **collapse this category Other Pacific Island languages:** |  | 8,034 | +/-1,514 |
| **Speak English "very well"** |  | 5,645 | +/-1,109 |
| **collapse this category Navajo:** |  | 70 | +/-110 |
| **Speak English "very well"** |  | 0 | +/-201 |
| **collapse this category Other Native North American languages:** |  | 44 | +/-75 |
| **Speak English "very well"** |  | 44 | +/-75 |
| **collapse this category Hungarian:** |  | 1,349 | +/-841 |
| **Speak English "very well"** |  | 910 | +/-664 |
| **collapse this category Arabic:** |  | 27,856 | +/-6,214 |
| **Speak English "very well"** |  | 17,126 | +/-3,448 |
| **collapse this category Hebrew:** |  | 1,028 | +/-528 |
| **Speak English "very well"** |  | 756 | +/-484 |
| **collapse this category African languages:** |  | 5,107 | +/-2,458 |
| **Speak English "very well"** |  | 3,301 | +/-1,473 |
| **collapse this category Other and unspecified languages:** |  | 981 | +/-538 |
| **Speak English "very well"** |  | 743 | +/-436 |

Source: B16001: LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS

AND OVER - Universe: Population 5 years and over 2010 American Community Survey 1-Year Estimates

Nineteen languages meet the DOJ Safe Harbor threshold of 1,000 speakers, while only two languages meet the five percent threshold. The two languages which meet both criteria are Spanish at 26.5 percent and Vietnamese at 5.8 percent of the LEP population that speaks English less than “very well” or “not at all” in Orange County.

### External Source #2 – Orange County Health Care Agency

As stated above, Radiant Health Centers provides the majority of its services to HIV positive individuals living in Orange County. Narrowing down the Orange County population who may currently need to access services at Radiant Health Centers, this table represents the accumulative number of HIV and AIDS cases in Orange County:

### Orange County HIV/AIDS Monthly Summary Report Cases Reported As Of December 31, 2016

|  |  |
| --- | --- |
|  | **TOTAL HIV/AIDS CASES**  |
| **LIVING**  | **CUMULATIVE**  |
| **Number**  | **Percent**  | **Number**  | **Percent**  |
| **RACE/ETHNICITY**  |   |   |   |   |
|  White  | 3,438 | 44.4%  | 6,851  | 54.2%  |
|  Black  | 383  | 4.9%  | 625  | 4.9%  |
|  Hispanic  | 3,355 | 43.4%  | 4,482  | 35.4%  |
|  Asian/Pacific Islander  | 489  | 6.3%  | 583  | 4.6%  |
|  American Indian/  | 15  | 0.2%  | 21  | 0.2%  |
|  Alaskan Native  |  |  |  |  |
|  Multi-race  | 55 | 0.7%  | 82  | 0.6%  |
|  Unknown  | 3  | 0.0%  | 3  | 0.0%  |

AIDS Reporting began in 1981. HIV reporting began in April 2006.

SOURCE: County of Orange, Health Care Agency, HIV/AIDS Surveillance, data as of December 31, 2016

It is important to note that certain populations are drawn to specific HIV service providers. For example, Delhi Center serves primarily Hispanic individuals. Additionally, APAIT (Asian Pacific AIDS Intervention Team)’s target population is Asian/Pacific Islander.

The Orange County Health Care Agency recognizes that the two main populations receiving HIV services in the County are White and Hispanic. In providing information about services, the Client Handbook is offered in both English and Spanish. The bi-annual (every other year) satisfaction survey and needs assessment is provided on-line and by hard copy in English and Spanish as well.

### Internal Sources - Radiant Health Centers

Radiant Health Centers keeps track of client statistics in its database, ClientTrack. Clients are asked for their race and ethnicity at the time of intake prior to the start of services. The following stats are based on clients receiving services within the past 12 months.

### Radiant Health Centers Clients by Race - Total Population 1437

|  |  |  |
| --- | --- | --- |
| **Race**  | **Clients**  | **% of Total**  |
| White  | 1039  | 72.30%  |
| Black  | 107  | 7.45%  |
| Asian  | 66  | 4.59%  |
| Pacific Islander  | 8  | <1%  |
| Native American  | 12  | <1%  |
| Multi-Race or Other  | 205  | 14.27%  |

### Radiant Health Centers Clients by Ethnicity - Total Population 1437

|  |  |  |
| --- | --- | --- |
| **Ethnicity**  | **Clients**  | **% of Total**  |
| Hispanic  | 727  | 50.59% |
| Non-Hispanic  | 686  | 47.74% |
| Unknown Ethnicity  | 24  | 1.67% |

Additionally, Radiant Health Centers asks for the clients’ primary language spoken for the purpose of being able to communicate with the clients and to arrange for alternative methods of communication if current staffing cannot communicate with a client due to their particular primary language.

**Radiant Health Centers Clients by Primary Language Spoken - Total Population 1437**

|  |  |  |
| --- | --- | --- |
| **Language**  | **Clients**  | **% of Total**  |
| American Sign Language  | 1  | <1%  |
| Cantonese  | 1  | <1%  |
| Chinese  | 1 | <1%  |
| English | 986 | 68.62 |
| Farsi  | 2  | <1%  |
| French  | 1  | <1%  |
| Japanese | 1 | <1% |
| Korean | 1 | <1% |
| Mandarin | 1 | <1% |
| Other- Non English  | 3  | <1%  |
| Portuguese | 1  | <1%  |
| Spanish  | 388  | 27%  |
| Tagalog | 2 | <1% |
| Thai | 1 | <1% |
| Vietnamese  | 15  | 1.04%  |
| Not Reported  | 32  | 2.22%  |

### Radiant Health Centers Clients Asked About Literacy Issues by Primary Language Spoken - Total Population 988

|  |  |  |  |
| --- | --- | --- | --- |
| **Language**  | **Clients**  | **Clients w/Literacy** **Issues**  | **% of Total**  |
| American Sign Language  | 2  | 0  | 0%  |
| Cantonese  | 1  | 1  | <1%  |
| English  | 508  | 42  | 5.56%  |
| Farsi  | 2  | 0  | 0%  |
| French  | 1  | 0  | 0%  |
| Other- Non English  | 1  | 0  | 0%  |
| Spanish  | 228  | 20  | 2.65%  |
| Vietnamese  | 11  | 1  | <1%  |

Based on Radiant Health Centers’ current client population, the two primary languages are English and Spanish including all of the clients who access Radiant Health Centers’ Extra Mile Transportation Program. Radiant Health Centers continues to provide client information in Spanish with appropriate direct service staffing levels to adequately assist this LEP population. Radiant Health Centers makes accommodations for the few monolingual Vietnamese clients who access services at Radiant Health Centers. Verbal translation has been provided in the past by another client or a client’s family member (using proper HIPAA protocol). Community partner APAIT provides translation support when needed, and Radiant Health Centers has contracted with PALS for Health for additional translation as well. Additionally, Radiant Health Centers has contracted with an ASL interpreter in the past when warranted.

These three populations do not meet the required Safe Harbor Provision threshold; however, Radiant Health Centers understands the importance of communicating with all clients and makes appropriate accommodations in order to provide services at the same level as the other populations assisted. Clients with literary issues make up a small percentage of the overall clients served. Recognizing the importance of equal access to information and services, case managers will assist these clients to ensure that they receive the same information and services as those who are literacy proficient.

**Factor 2: The frequency with which LEP persons come into contact with the program.**  Radiant Health Centers Services Foundation Orange County is open Monday through Friday, 8:30 a.m. to 5:00 p.m. for most services. Radiant Health Centers’ Transportation Services provides transportation during these hours but recognizes the need for transportation earlier in the morning or later in the afternoon into the evening. Accommodations are made for clients needing transportation when the office is closed.

Clients access Radiant Health Centers’ services based on their needs. Depending on a client’s acuity, they may access services more or less frequently. For example, clients on nurse case management may require transportation one or more times per week and are in contact with their nurse case manager frequently, but they may not come to Radiant Health Centers at all to receive any additional services. Clients with a social service case manager or social worker may access services at Radiant Health Centers’ office one or two times per week especially if connected with mental health services or attend the weekly Life Skills workshops. These clients may receive bus passes to attend daily AA meetings in the community and also see their physicians on a regular basis. Clients on Self Advocacy (who do not need a case manager) may only access particular services such as van rides or food pantry without having to come into Radiant Health Centers for additional services, especially those who are working regularly.

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

Radiant Health Centers was founded by a small, dedicated group of community volunteers in 1985 to provide support to their friends and loved ones who were dying of AIDS and in desperate need of help. Radiant Health Centers has served almost 75% of the individuals affected by HIV/AIDS in Orange County and has evolved into the most comprehensive and experienced nonprofit HIV/AIDS service agency in the county. Radiant Health Centers’ staff of almost 50 people reflects the communities served – more than 25% of the staff identifies themselves as Latino and bilingual in Spanish. Radiant Health Centers is governed by an all-volunteer 16 member board of directors and last year over 550 volunteers gave of their time. Among these individuals are people living with HIV/AIDS who further enhance our ability to serve our clients. Radiant Health Centers’ mission is to prevent the spread of HIV and improve the lives of men, women, and children affected by HIV/AIDS in Orange County. Core services provided by Radiant Health Centers include case management, mental health, family and children’s program, substance abuse counseling, home health and hospice care, nutrition services, transportation to primary care and treatment services, housing assistance, emergency financial assistance, HIV testing and prevention. While Radiant Health Centers’ clients are increasingly diverse, a common factor is poverty. Services are available in English and Spanish at no charge to anyone living with HIV/AIDS in Orange County.

The needs of individuals and families living with HIV/AIDS are complex. Many infected individuals face multiple barriers that could prevent them from receiving the full benefit of available care. The services provided by Radiant Health Centers help individuals living with HIV/AIDS remain in medical care. This is critical in maintaining their health, reducing their viral load and the number of new HIV infections in the community. Radiant Health Centers is the largest provider of HIV services in Orange County and the majority of individuals living with HIV/AIDS rely on the agency for support.

The case manager serves as liaison between the client and agency services. This system allows for a centralized intake and screening process for all services, and helps to identify client needs before they become emergent. At intake, clients are informed of their client rights, particularly around confidentiality, and asked to sign consents for participation and any necessary releases of information. A comprehensive assessment of medical, financial, practical, psychological, social, spiritual, and legal needs is completed. Clients are also provided information about treatment, disease prevention, services, public benefits programs, and community resources. Clients must provide or sign a release for Radiant Health Centers to obtain verification of their HIV diagnosis and disability status. Also, they are asked to show proof of income, or complete an affidavit of eligibility about their financial income, and report whether they are receiving services from other providers.

Radiant Health Centers has the one of only two curb-to-curb, van-based program for people living with HIV/AIDS in Orange Count with Radiant Health Centers’ being the largest and most comprehensive. The first priority of The Extra Mile Transportation Program is to help clients access the critical services essential to their health and well-being. The program provides clients who might otherwise be homebound with transportation to physician, dental and psychiatric appointments, mental health counseling sessions and to other programs at Radiant Health Centers and other community organizations. Principal health agencies and organizations will include, but are not limited to, UCI Medical Center, Orange County Health Care Agency HIV Clinic, and Laguna Beach Community Clinic, for the provision of medical care and services. Radiant Health Centers provides transportation for people of all ages; from young children, who are dependent on their parent(s) also infected by the disease, to seniors, many of whom cannot afford other means of transportation.

Many Radiant Health Centers clients have physical, psychological, financial, and cultural barriers to obtaining appropriate medical care and support services that sustain health, promote self-sufficiency, reduce suffering and prevent the spread of HIV. The transportation program is one of the practical ways Radiant Health Centers connects people with the services that will help them live with HIV/AIDS and prevent its spread. Results from the Radiant Health Centers 2016 Client Survey show that 97.2% of responding transportation clients feels that Transportation Services helped them get to medical appointments and other support services they may have otherwise missed.

Radiant Health Centers’ transportation service is a demand-response system. It is normally available between 7 a.m. and 9 p.m., Monday through Friday, utilizing overlapping driver shifts if necessary to meet demand. The agency’s current four vehicles - all obtained through previous Sect. 5310 grants – are wheelchair accessible, and all drivers are trained to handle the medical complications of HIV disease. A local taxi service is utilized as needed for early morning, late night and weekend assistance. In addition, Transportation Services benefits other agency programs such as delivering Radiant Health Centers Food Pantry orders and transporting medical equipment to clients’ homes. The program is one of Radiant Health Centers’ core services and is critical in assuring that all clients have access to primary care and treatment services.

When clients are first served by a case manager at Radiant Health Centers, they complete an intake sheet to assist staff in assessing the client’s needs. All clients who are in need of transportation will immediately be referred to Radiant Health Centers’ Extra Mile Transportation Program for assistance. Depending on their physical health, financial situation, and location, they will be provided with bus passes, ACCESS fare coupons, taxi rides and/or van service. More advanced notice is preferred, but our clients often face medical emergencies that warrant an immediate trip to the doctor. When other HIV/AIDS service providers within Orange County are unable to provide medically-related transportation services to their clients due to lack of resources, a client’s case manager will fax or electronically refer the ride request to the Radiant Health Centers Transportation Supervisor, who will schedule the ride, notify the client by telephone, and dispatch the vehicle. Clients are taken from their residences, or another location if requested, to their appointment sites and returned home with curb-to-curb service from trained drivers.

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

Radiant Health Centers Communications Committee. There are several key components to the plan that will provide LEP outreach including web microsites designed to target specific populations. Currently, the overall Communications budget is set at $107,885 which includes LEP outreach expenses for a new prevention campaign targeted to the Latino population.

Each agency department providing clients services budgets for outreach materials and translation of newsletters and agency forms. Some line item expenses are department-specific, others are allocated expenses across the six client service departments: Case Management, Mental Health, Transportation, Nutrition, Housing, and Health Education and Prevention. Here is a breakdown of the current client outreach/materials expenses allocated to these six departments:

Spanish translation for agency forms: $1200

General forms printed in English and Spanish: $3300

Additionally, Health Education and Prevention provides SOMOS for high-risk Latino men with an annual program cost of $30,000.

### 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, the majority of the clients accessing services at Radiant Health Centers are English speaking with the second largest population being monolingual Spanish-speaking. All client forms as well as the Radiant Health Centers brochure and Client Handbook are offered in English and Spanish.

## Language Assistance Plan

### Limited English Proficiency Populations Served

Client demographic information is collected by Radiant Health Centers staff at time of intake or by referral from other providers. This information is entered into both hard copy and electronic files and used regularly in determining how better fulfill Radiant Health Centers’ mission in assisting the variety of populations Radiant Health Centers serves. Demographics including race, ethnicity and language are used in obtaining public and private funding for these services and for subsequent grant reporting as well.

As stated in the Four Factor Analysis, the top three languages spoken by Radiant Health Centers clients are as follows:

 English 69.42%







 Spanish 28.00%

 Vietnamese 1.14%

The Spanish-speaking client population historically continues to be the largest population of

Radiant Health Centers’ clients besides English. While Vietnamese makes up the second largest LEP population in Orange County (61.8%) which would be recognized under the Safe Harbor Provision, it is significantly smaller as an HIV positive population and does not meet the Safe Harbor Provision.

### Language Assistance

When potential clients request services for the first time, they are directed to a case manager of the day based on whether or not they speak English. Clients who are monolingual Spanish speaking are assessed by one of several Spanish speaking case managers. Once activated as an Radiant Health Centers client, clients have regular access to Spanish speaking staff members who can assist them in receiving serves.

If a client is monolingual in a different language, the client’s case manager or the case manager of the day will arrange for translation services for the client as needed. As discussed above, Radiant Health Centers partners with APAIT who will provide translation assistance for the Asian/Pacific Islander populations.

Radiant Health Centers regularly translates agency materials into Spanish using paid outside professional services or staff members if available.

Current forms and publications are provided in both English and Spanish include:





























Radiant Health Centers Client Handbook

OCHCA Client Handbook

Clients Rights and Responsibilities

Client Grievance Policies and Procedures

Client Agreement for Services

Radiant Health Centers Notice of Privacy Practices

ARIES Consent Form

Health Care/Service Provider Release and Disclaimer

Radiant Health Centers Email Informed Consent Form

Authorization to Disclose Protected Health Information

Passengers’ Code of Conduct

OCTA Reduced Fare Identification Card Application

Food Pantry Order Form

SNAP Food Stamp brochure

Regarding this Title VI Plan, the Title VI Notice to the Public, Complaint Form and Complaint Procedures are currently available in Spanish. The agency website will be updated to include these Title VI documents in English and Spanish as well. Information about the Title VI plan will be provided in an upcoming The Homepage issue.

Additionally, the following client surveys are provided in both languages: Radiant Health Centers Client Survey, Radiant Health Centers Food Pantry Survey, Ryan White Client Satisfaction Survey, and HIV Needs Survey.

Other documents can be translated to Spanish orally if needed by Spanish speaking staff members and volunteers.

### Monitoring

Radiant Health Centers’ Quality Management (QM) Plan is designed to evaluate, maintain and improve the quality of agency programs and services. A QM Plan is developed annually and is approved by the Programs Committee. The QM Plan contains process and outcome measures that are examined annually in each program. In order to review all agency programs, one-quarter of the agency's programs are audited every three months. Any programs having substandard findings have a "plan of action" developed and are re-audited in subsequent quarters until they are brought into compliance. Results of audits are reported to the Programs Committee, and the Orange County Health Care Agency.

Program monitoring and evaluation of the agency’s programs occurs at several levels and is included in the Radiant Health Centers Quality Management program. The provision of units of service for each program are documented in the Radiant Health Centers database by the appropriate staff person and tracked by the Radiant Health Centers Finance Department. In addition, the program directors and executive manager monitors all aspects of the program including both process and outcome measures. Internal audits are conducted throughout the year to assure agency-wide consistency and program procedure adherence. Documentation of client eligibility for services is maintained in the client chart and client satisfaction is monitored using an annual client survey. Finally, the Radiant Health Centers Program Committee, a subcommittee of our Board of Directors, reviews, monitors, and assesses our monitoring and evaluation efforts on an annual basis.

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

### Employee Training

Radiant Health Centers has historically valued diversity which is evident by the multi-cultural team of staff and volunteers. Particular job positions require staff members to be bilingual in English and Spanish. Occasionally, bilingual volunteers are recruited and made available to assist as needed.

When staff is hired, they are trained by their immediate supervisor. Cultural competency is covered in regards to client service provision. During weekly and/or monthly clinical team meetings, cultural competency concerns are discussed when issues arise. For example, clinical staff was recently notified that CalOptima provides Cultural and Linguistic Services to eligible clients needing interpreter services at key points of medical and non-medical care. This information will be passed on to clients who may qualify and need this service.

As trained by the Volunteer Coordinator and/or program staff, volunteers are instructed to find an appropriate staff member or volunteer to assist a client who is experiencing difficulty with communication in order to receive requested services.

Radiant Health Centers’ current Transportation Services staff will receive training on Monday, July 31, 2017 on the Title VI plan

including:

Understanding Title VI responsibilities





The language assistance services offered by Radiant Health Centers in order to assist clients in obtaining services

 Location of Title VI Notice to the Public, Complaint Form and Procedures



 Assisting transportation clients in obtaining Title VI information when requested Additional training will be provided when changes are made to the Title VI plan. New Transportation staff will learn about the Title VI plan upon initial new hire training.



The Title VI plan will also be presented to staff at an upcoming all-staff meeting.

### Conclusion

The LEP Plan is designed to be flexible and to be reviewed as an ongoing process. As such, it is important to consider whether new documents and services need to be made accessible for LEP persons and also to monitor changes in demographics, and types of services in those demographics. When changes occur, the LEP Plan will be updated as appropriate. This LEP plan will be provided to any person or agency requesting a copy.

Any questions or comments regarding this Plan should be directed to:

Thom Chapman, Director of Support Services

Radiant Health Centers

17982 Sky Park Circle, Suite J, Irvine, CA 92614

(949) 809-5770, tchapman@radianthealthcenters.org

### Membership of Non‐Elected Committees and Councils

Radiant Health Centers’ Program Committee is the non-elected committee that is responsible for oversight of all Radiant Health Centers’ programs including the maintenance and expansion of existing programs and development of new programs in conjunction with program staff. It approves the annual prioritization of services and monitors and evaluates the implementation of strategies. It periodically assesses the market/community needs for Radiant Health Centers’ services and ensures that Radiant Health Centers is meeting those needs, if feasible. It recommends and approves the program development component of the strategic plan and the annual operating plan, monitoring and assessing the effectiveness of the plans. Additionally, the Program Committee ensures that services are in line with Radiant Health Centers’ mission, and it provides input and recommendations with respect to significant decisions impacting programs and services. The Program Committee also acts as the oversight committee in the development and implementation of Radiant Health Centers’ Quality Management Plan.

This table depicts the ethnic and racial breakdown of the Program Committee:

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **E** | **thnicity**  |  |  | **Race**  |  |
| Black  | 1  | 16.67%  |   | Hispanic  |  | 2  | 33.33%  |
| White  | 5  | 83.33%  |   | Non Hispanic  |  | 4  | 66.67%  |

The Program Committee is a subcommittee of the Radiant Health Centers Board of Directors. The Board of Directors appoints board members to serve on the Program Committee. Radiant Health Centers’ Executive Director/CEO is responsible for assigning staff and recommending other community members to serve on the committee. Due to the nature of the committee makeup and oversight, committee recruitment is limited and targeted.

**Title VI Equity Analysis**

Radiant Health Centers does not have transit-related facilities; therefore, a Title VI equity analysis is not required.