



Title VI Policy for RAIN Transitional Living Center Grants and Special Programs

Effective Date: 07/01/2021

Purpose and Scope

Title VI of the Civil Rights Act is a Federal statute that prohibits recipients of Federal financial assistance (e.g., states, local governments, transit providers) from discriminating on the basis of race, color, or national origin in their programs or activities, and it obligates Federal funding agencies to enforce compliance. Title VI is a Federal law that applies to recipients and sub-recipients of Federal assistance. RAIN Transitional Living Center (TLC) is a sub-recipient of Federal transportation funding from the Ventura County Transportation Commission and as such is required to abide by all local, state and federal regulations concerning matters of discrimination as it relates to the delivery of transportation services.

Definitions

FTA – Federal Transit Administration

Complainant – person making the complaint of discrimination or disparate treatment

Discrimination – any action or inaction, whether intentional or unintentional, in any program or activity of a Federal aid recipient, sub-recipient, or contractor that results in disparate treatment, disparate impact, or perpetuating the effects of prior discrimination based on race, color, or national origin.

Disparate treatment – actions that result in circumstances where similarly situated persons are intentionally treated differently (i.e., less favorably) than others because of their race, color, or national origin.

Limited English Proficient (LEP) persons – refers to persons for whom English is not their primary language and who have a limited ability to read, write, speak or understand English. It includes people who reported to the U.S. Census that they speak English less than very well, or not at all.

National origin – the particular nation in which a person was born, or where a person's parents or ancestors were born.

Recipient – any public or private entity that receives Federal financial assistance from the FTA, whether directly from the FTA or indirectly through a primary recipient such as the VCTC. The term does not include any ultimate beneficiary under any such assistance program.

Sub-recipient – an entity, such as RAIN TLC, that receives Federal financial assistance from the FTA through a primary recipient.

Title VI Program – refers to a document developed to describe and demonstrate compliance with Title VI requirements.

RAIN TLC – RAIN Transitional Living Center

VCTC – Ventura County Transportation Commission

RAIN TLC Title VI Notice

**Notifying the Public of Rights Under Title VI
RAIN Transitional Living Center**

The RAIN TLC operates its programs and services without regard to race, color, or national origin in accordance with Title VI of the Civil Rights Act. Any person who believes themselves aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the RAIN TLC.

For more information on the RAIN TLC’s civil rights program and the process to file a complaint, contact (805) 388-1356 or e-mail HSA-RAIN-Transport@ventura.org

A complaint may be filed 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 Avenue, SE, Washington, DC 20590.

**Notificación al Público de los Derechos bajo el Título VI
RAIN Transitional Living Center**

RAIN TLC opera sus programas y servicios sin tener en cuenta la raza, el color y nacionalidad de acuerdo con el Título VI de la Ley de Derechos Civiles. Cualquier persona que se crea agraviada por cualquier práctica discriminatoria ilegal bajo el Título VI puede presentar una queja ante RAIN TLC.

Para obtener más información sobre el programa de derechos civiles de RAIN TLC y el proceso para presentar una queja, comuníquese con el (805) 388-1356 o envíe un correo electrónico HSA-RAIN-Transport@ventura.org

Una queja puede ser presentada directamente ante la Administración Federal de Tránsito mediante la presentación de una queja ante la Oficina de Derechos Civiles, Atención: Título VI Coordinador del Programa, East Building, 5th Floor-TCR, 1200 New Jersey Avenue, SE, Washington, DC 20590.

RAIN TLC Title VI Notice to the public is currently posted at the following locations:

Location Name	Address	City
RAIN Transitional Living Center	1732 S. Lewis Road	Camarillo
All Agency Vehicles	1732 S. Lewis Road	Camarillo
Human Services Agency Website	https://www.ventura.org/human-services-agency/	

RAIN TLC Overview and Program Description

The RAIN TLC, located in Camarillo, began by offering shelter to homeless individuals and families in Ventura County during a particularly wet and inclement winter season in 1997. Local partners joined together to offer shelter to those who were homeless and many who were residing in camps along a local river. It served, in practicality, as an emergency homeless shelter. Over time, the operations moved to a more permanent location, and the services transformed to a transitional living Center service model, serving households who need a temporary place to stay while they restore their income, self-sufficiency, and housing.

Operated by Ventura County's Human Services Agency, the RAIN TLC's purpose is to provide transitional housing to individuals and families from Ventura County who are experiencing homelessness, including those who are fleeing or who have a history of domestic violence. The RAIN TLC's staff are trained to provide an approach that is trauma-informed, person-centered, and principles-based. To assist individuals and families to be successful, the RAIN TLC utilizes the Bridges to Home program, which focuses on the existing strengths and skills of clients and enables them to work through the five program phases. These phases build on the attributes of being motivated, responsible, and accountable—ultimately leading to employment and permanent housing.

RAIN TLC Title IV Complaint Process

Any person who believes they have been discriminated against on the basis of race, color, or national origin by the RAIN TLC may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form. The RAIN TLC investigates complaints received no more than 180 days after the alleged incident. Furthermore, the RAIN TLC will only process complaints that are fully completed.

Within 10 business days of receiving the complaint, the RAIN TLC will review the complaint to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter informing them whether or not the complaint will be investigated by our office. The RAIN TLC will investigate the complaint in a timely manner. If more information is required to resolve the case, the RAIN TLC 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 ten (10) business days, the RAIN TLC will administratively close the case.

A case can be administratively closed if the complainant no longer wishes to pursue their case. After the investigator reviews the complaint, they will issue one of the following two letters to the complainant: a Closure Letter or a Letter of Findings (LOF). A Closure Letter summarizes the allegations, states that there was not a Title VI violation, and confirms that the case will be closed. An LOF summarizes the allegations and interviews regarding the alleged incident and explains whether any disciplinary action, additional training of the staff member, or any other action will occur.

If the complainant wishes to appeal the decision, they have 10 business days, after the date of the Closure 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
Attention Title VI Program Coordinator
East Building, 5th Floor-TCR
1200 New Jersey Avenue SE
Washington, DC 20590

How to File a Complaint

Title VI allows persons alleging discrimination based on race, color, or national origin to file administrative complaints with the government departments and agencies that provide the financial assistance and/or services. Any person who believes themselves to be subjected to discrimination on the basis of race, color, or national origin may by themselves or through a representative file, a written complaint with the FTA. A complaint must be filed no later than 180 days after the date of the alleged discrimination.

- To file a complaint with the RAIN TLC, persons may send a letter to the following:
Program Manager (805)388-1356
RAIN TLC HSA-RAIN-Transport@ventura.org
1732 S. Lewis Road
Camarillo, CA 93012
- To file a complaint with the Federal Transportation Administration, persons may send a letter to the following:
Federal Transit Administration Office of Civil Rights
Attention: Title VI Program Coordinator
East Building, 5th Floor – TCR
1200 New Jersey Avenue, SE
Washington, DC 20590

Any claim filed alleging discrimination should include the victim's name, address, and phone number; the nature of the incident (race, color, or national origin); the date that the incident occurred; and a description of what happened, including identification of the person or organization that discriminated.

All complaints will be investigated on the basis of intentional discrimination and/or on the basis of disparate impact discrimination, where a neutral policy or practice has the effect of disproportionately excluding or adversely affecting minority beneficiaries or other protected individuals and the recipient's practice lacks a substantial legitimate justification.

RAIN TLC Title VI Complaint Form

COMPLAINT FORM (Please write legibly.)

Section I:		
1. Name		
2. Address:		
3. Telephone:	3b. Secondary Phone (Optional)	
4. Email Address:		
5. Accessible Format Requirements	<input type="checkbox"/> Large Print	<input type="checkbox"/> Audio Tape
	<input type="checkbox"/> TDD	<input type="checkbox"/> Other
Section II:		
6. Are you filing this complaint on your own behalf?	<input type="checkbox"/> YES	<input type="checkbox"/> NO
<i>If you answered "YES" to #6, go to Section III.</i>		
7. <i>If you answered "NO" to #6, what is the name of the person for whom you are filing this complaint?</i> 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 from the individual to file on their behalf.	<input type="checkbox"/> YES	<input type="checkbox"/> NO
Section III:		
11. I believe the discrimination I experience was based on (check all that apply): <input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> 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 the names and contact information of any witnesses. If more space is needed, please attach additional sheets of paper.		

COMPLAINT FORM

Section IV:		
14. Have you previously filed a Title VI complaint With RAIN Transitional Living Center?	<input type="checkbox"/> YES	<input type="checkbox"/> NO
Section V:		
15. Have you filed this complaint with any other Federal, State or local agency, or with any Federal or State court?		
<input type="checkbox"/> YES <input type="checkbox"/> NO <i>If NO, go to section VI.</i> IF YES, check all that apply and print the name of the agency or court.		
<input type="checkbox"/> Federal Agency _____	<input type="checkbox"/> State Agency _____	
<input type="checkbox"/> Federal Court _____	<input type="checkbox"/> Local Agency _____	
<input type="checkbox"/> State Court _____		
16. <i>If you answered "YES" to #15, provide information about a contact person at the agency/court where the complaint was filed.</i>		
Name: _____		
Title: _____		
Agency: _____		
Address: _____		
Telephone Number: _____		Email Address: _____
Section VI:		
Name of Transit Agency complaint is against: _____		
Contact Persons: _____		
Telephone Number: _____		

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 this form:

Signature _____ Date _____

Please submit this form in person, or by mail to the address below:

RAIN Transitional Living Center
 Attn: Program Manager
 1732 S. Lewis Road
 Camarillo, CA 93012

Titulo VI Procedimiento de Queja

Cualquier persona que crea que ha sido discriminada por motivos de raza, color u origen nacional por RAIN Transitional Living Center puede presentar una queja del Título VI completando y presentando el Formulario de queja del Título VI de la agencia. Rain TLC investiga las quejas recibidas no más de 180 días después del supuesto incidente. RAIN TLC solo procesará las quejas que estén completas.

- Para presentar una queja ante RAIN TLC, las personas pueden enviar una carta a los siguientes:
Program Manager (805)388-1356
RAIN TLC HSA-RAIN-Transport@ventura.org
1732 S. Lewis Road
Camarillo, CA 93012
- Para presentar una queja ante la Administración Federal de Transporte, las personas pueden enviar una carta a los siguientes:
Federal Transit Administration Office of Civil Rights
Attention: Title VI Program Coordinator
East Building, 5th Floor – TCR
1200 New Jersey Avenue, SE
Washington, DC 20590

Cualquier reclamo presentado alegando discriminación debe incluir el nombre, la dirección y el número de teléfono de la víctima; la naturaleza del incidente (raza, color u origen nacional); la fecha en que ocurrió el incidente; y una descripción de lo que sucedió, incluida la identificación de la persona u organización que discriminó.

Todas las denuncias se investigarán sobre la base de la discriminación intencional y/o sobre la base de una discriminación de impacto dispar, cuando una política o práctica neutral tenga el efecto de excluir o afectar negativamente a los beneficiarios minoritarios u otras personas protegidas y la práctica del receptor carezca de una justificación legítima sustancial.

Forma de Queja (Escribir en forma legible.)

Sección I:		
1. Nombre:		
2. Dirección:		
3. Teléfono:	3b. Teléfono Secundario (opcional)	
4. Coreo Electrónico:		
5. ¿Requisitos de forma accesible?	<input type="checkbox"/> Impresión grande	<input type="checkbox"/> Cinta de audio
	<input type="checkbox"/> TDD	<input type="checkbox"/> Otros
Sección II:		
6. ¿Está presentando esta queja en su propio nombre?	<input type="checkbox"/> SI	<input type="checkbox"/> NO
Si usted contesto "SI" a #6, vaya a la Sección III.		
7. ¿Si usted contesto "NO" at #6, cual es el nombre de la persona para quien está presentando? Nombre:		
8. ¿Cuál es su relación con este individuo?:		
9. Por favor, explique por qué han presentado para una tercera parte:		
10. Por favor, confirme que ha obtenido el permiso de la parte agraviada en el archive en su nombre.	<input type="checkbox"/> SI	<input type="checkbox"/> NO
Sección III:		
11. Creo que la discriminación que he experimentado fue basada en (marque toda las que correspondan): <input type="checkbox"/> Raza <input type="checkbox"/> Color <input type="checkbox"/> Origen Nacional		
12. Fecha de supuesta discriminación:	(mm/dd/aaaa)	
13. Explique lo más claro posible lo que ocurrió y por qué usted cree que son objeto de discriminación. Describa todas las personas que fueron involucrados. Incluya el nombre y la información de contacto de la(s) persona(s) que discriminaron en contra de usted (si se conoce), así come los nombres y la información de contacto de los testigos. Si se necesita más espacio, por favor adjunte hojas adicionales de papel.		

FORMA DE QUEJA

Sección IV:		
14. ¿Anteriormente ha presentado un Título VI denuncia con RAIN Transitional Living Center?	<input type="checkbox"/> SI	<input type="checkbox"/> NO
Sección V:		
15. ¿Ha presentado esta queja con cualquier otro local, estatal o federal, o con cualquier Federal o Estado?		
<input type="checkbox"/> SI <input type="checkbox"/> NO Marque todo lo que aplique:		
<input type="checkbox"/> Agencia Federal _____	<input type="checkbox"/> Agencia Estatal _____	
<input type="checkbox"/> Tribunal Federal _____	<input type="checkbox"/> Agencia Local _____	
<input type="checkbox"/> Tribunal Estatal _____		
16. Si usted contestó "SI" a la pregunta #15, proporcione información acerca de una persona de contacto en la agencia/tribunal donde se presentó la denuncia. If no, go to Section VI.)		
Nombre:		
Titulo:		
Agencia:		
Dirección:		
Numero de Teléfono:		Coreo Electrónico:
Sección VI:		
Nombre de la queja de la Agencia de Tránsito es contra:		
Personal de contacto:		
Numero de teléfono:		

Puede adjuntar cualquier material escrito u otra información que crea que es relevante para su queja.

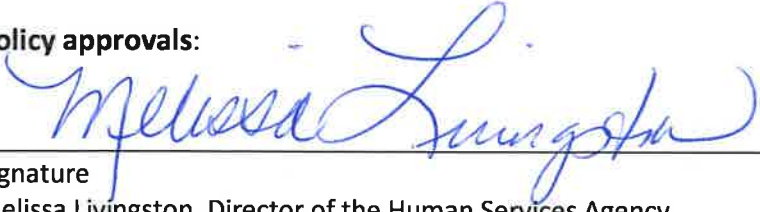
La firma y la fecha se requieren a continuación para completar el formulario:

Firma _____ Fecha _____

Por favor, envíe este formulario en persona o por correo a la siguiente dirección:

RAIN Transitional Living Center
 Attn: Program Manager
 1732 S. Lewis Road
 Camarillo, CA 93012

Policy approvals:



Signature
Melissa Livingston, Director of the Human Services Agency



Date