

FTA 5310

Title VI Plan

October 8, 2018



PALOLO CHINESE HOME
Better Care. Better Lives

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Executive Summary

The PCH community is comprised of seniors and their families in need of health-related services provided on-campus or in their homes. PCH provides both on campus and in-home long-term care (LTC) services. There is a continuum of care available to meet the different needs and payment abilities of residents. PCH provides hospice care, skilled nursing, rehab services – physical, occupational and speech therapy, intermediate nursing care, adult residential care home, overnight respite, senior day care, and community-based services – personal care, house cleaning, meals to go and information and referral services. Referrals come from communities and hospitals from all over the island. PCH accepts Medicare, Medicaid, Social Security Supplemental Income and Senior Advantage plans.

Non-Discrimination Policy Statement

The **Palolo Chinese Home** policy assures full compliance with Title VI of the Civil Rights act of 1964, the Restoration Act of 1987, and related statutes and regulations in all programs and activities. Title VI states that “no person shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination” under any **Palolo Chinese Home** sponsored program or activity. There is no distinction between the sources of funding.

The **Palolo Chinese Home** also assures that every effort will be made to provide programs, services and activities in a nondiscriminatory manner to minority and low-income populations. Furthermore, the **Palolo Chinese Home** will take reasonable steps to provide meaningful access to services for persons with Limited English Proficiency (LEP).

When the **Palolo Chinese Home** distributes Federal-aid funds to another entity/person, the **Palolo Chinese Home** will ensure all sub-recipients fully comply with the **Palolo Chinese Home** Title VI Nondiscrimination Program requirements. The **Palolo Chinese Home** has delegated the authority to the **Administrator**, Title VI Program Coordinator, to oversee and implement FTA Title VI requirements.



SIGNATURE OF AUTHORIZED OFFICIAL

Chief Executive Officer

TITLE

07/12/19

DATE

Non-Discrimination Notice to the Public

Notification of Rights Under Title VI



PALOLO CHINESE HOME
Better Care. Better Lives

The **Palolo Chinese Home** operates its programs and services without regard to race, color, or national origin in accordance with Title VI of the Civil Rights Act of 1964, and related nondiscrimination authorities, any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the **Title VI Program Coordinator**.

For more information on the **Palolo Chinese Home** Title VI Program, and/or discrimination complaint procedures, contact **our Administrator at (808) 748-4908** or visit our administrative office at **Palolo Chinese Home, 2459 10th Avenue, Honolulu, Hawaii 96816**.

A complainant may file a complaint directly with the State of Hawaii Department of Transportation (HDOT) Office of Civil Rights, ATTN: Title VI Specialist, 200 Rodgers Boulevard, Honolulu, HI 96819 or the Federal Transit Administration (FTA) ATTN: 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 **our Administrator at (808) 748-4908** or visit our administrative office at **Palolo Chinese Home, 2459 10th Avenue, Honolulu, Hawaii 96816** Or you may contact **Bilingual Access line at (808) 526-9724** and the hours of availability are 24 hours a day.

List of Locations Where Title VI Notice Is Posted

The Title VI Non-Discrimination Notice to the public is currently posted at the following locations:

Location Name	Address	City
Palolo Chinese Home: Administration Office	2459 10 th Avenue	Honolulu
Palolo Chinese Home: Vehicle	2459 10 th Avenue	Honolulu
Palolo Chinese Home: Environmental Office	2459 10 th Avenue	Honolulu
Palolo Chine Home Website: www.palolohome.org		

Discrimination Complaint Procedures

These procedures provide guidance for all complaints filed under Title VI of the Civil Rights Act of 1964, as they relate to any program or activity that is administered by the **Palolo Chinese Home**, or its consultants, contractors and vendors. In addition to these procedures, complainants have the right to file a formal complaint with other State or Federal agencies or to seek private counsel for complaints alleging discrimination. Every effort will be made to resolve complaints at the lowest possible level.

- (1) Any person who believes they have been discriminated against on the basis of race, color, or national origin, may file a discrimination complaint by completing and submitting the agency's Title VI Complaint Form.
- (2) Formal complaints must be filed within one-hundred eighty (180) calendar days of the latest incident of alleged discrimination, or the date when the alleged discrimination became known to the complainant(s), or where there has been a continuing course of conduct, the date on which the conduct was discontinued or the latest instance of the conduct.
- (3) Complaints must be in writing and signed by the complainant(s) and must include the complainant(s) name, address and phone number.
- (4) Allegations received by fax or e-mail will be acknowledged and processed, once the identity of the complainant(s) and the intent to proceed with the complaint have been established. For this, the complainant(s) is required to mail the signed, original of the fax or email transmittal for the complaint to be processed.
- (5) Allegations received by telephone will be reduced to writing and provided to the complainant(s) for confirmation or revision before processing. A complaint form will be forwarded to the complainant(s) to complete, sign and return for processing.
- (6) Once submitted **Palolo Chinese Home** will review the complaint form to determine jurisdiction. All complainants will receive an acknowledgement letter informing them of whether the complaint will be investigated by the **Palolo Chinese Home** or submitted to the State or Federal authority for processing.

Discrimination Complaint Form

Section I:		
Name:		
Address:		
Telephone (Home):	Telephone (Work):	
Electronic Mail Address:		
Accessible Format Requirements?	Large Print <input type="checkbox"/>	Audio Tape <input type="checkbox"/>
	TDD <input type="checkbox"/>	Other <input type="checkbox"/>
Section II:		
Are you filing this complaint on your own behalf?	Yes* <input type="checkbox"/>	No <input type="checkbox"/>
<i>*If you answered "yes" to this question, go to Section III.</i>		
If not, please supply the name and relationship of the person for whom you are complaining.		
Please explain why you have filed for a third party:		
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Section III:		
I believe the discrimination I experienced was based on (check all that apply):		
Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin <input type="checkbox"/>		
Date of Alleged Discrimination (Month, Day, Year):		
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 need, please use the back of this form.		
Section VI:		
Have you previously filed a discrimination complaint with this agency?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
If yes, please provide any reference information regarding your previous complaint.		

Section V:

Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?

☐ Yes ☐ No

If yes, name all that apply:

Federal Agency:

Federal Court:

State Court:

State Agency:

Local Agency:

Please provide information about a contact person at the agency/court where the complaint was filed.

Name:

Title:

Agency:

Address:

Telephone:

Section VI:

Name of agency complaint is against:

Name of person complaint is against:

Title:

Location:

Telephone Number (if available):

You may attach any written materials or other information that you think is relevant to your Complaint. Your signature and date are required below

Signature

Date

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

Palolo Chinese Home
2459 10th Avenue
Honolulu, Hawaii 96816

A copy of this form can be found at:

- Palolo Chinese Home: Administration Office, Environmental Services Office & Vehicles
- Palolo Chinese Home Website: www.palolohome.org

Discrimination Investigations, Complaints and Lawsuits

Description/Name	Date (Month/ Day/ Year)	Summary (include the basis of complaint: race, color, national origin, disability)	Status	Action (s) Taken (Final findings?)
INVESTIGATIONS				
1) None				
2)				
LAWSUITS				
1) None				
2)				
COMPLAINTS				
1)None				
2)				

This form will be submitted annually to HDOT OCR. If no investigations, lawsuits, or complaints were filed, type "None" for each category.

FTA 5310

Public Participation Plan



PALOLO CHINESE HOME
Better Care. Better Lives

The **Palolo Chinese Home** engages the public in its planning and decision-making processes, as well as its marketing and outreach activities. The public will be invited to participate in the process whether through public meetings or surveys. As an agency receiving federal financial assistance, the **Palolo Chinese Home** made the following community outreach efforts:

REQUIRED: List all public meetings or public hearings that the agency conducts. List all publications and/or public announcements of the events and include the frequency of the event(s) held.

Event Date (Actual date held, Quarterly, Annual, Various)	Your Agency Name Staffer(s) (Full Name)	Event (Fair, Project mtg., Agency mtg., Council mtg.)	Date Publicized and Communication Method (Public Notice, Posters, Social Media)	Outreach Method (Meeting, Outreach, Survey, Fair, etc.)	Notes (Number of days event held, format used in conducting the meeting, Type of Event, Location, Number of Participants)
02/09/2018 Annual	Palolo Chinese Home	Chinese New Year	public notice, flyers & website	Community Fair	1-day event; Information booth; 300 participants; Chinese Lion Dance; Firecrackers; Personal Guided Tours; Title VI Notice displayed.

LIST ALL UPCOMING PUBLIC MEETINGS OR PUBLIC HEARINGS THAT THE AGENCY WILL CONDUCT. INCLUDE FREQUENCY OF THE EVENT(S) HELD.

For example: Upcoming planned or anticipated events; such as community-based outreach meetings, peer-to-peer agency coordinated meetings with public participation, public-information meetings, etc. say, on a monthly, quarterly, semi-annual or annual basis.

1. Chinese New Year (Annual)

- Recognizing people who donates to PCH
- Giving away “The Spirit in Care giving” book by Gerry Yahata
- Lion Dance by gee Yung International Dragon and Lion Dance Association
- Providing tours to those who are interested in seeing the whole facilities

2. Golf Tournament (Annual)

- Passing out the handbooks.
- Organizing different vendors that will be participating in the programs such as Golfer and Sponsorships.
- Facilitating the program, volunteers and dinner.

3. Newsletter

Details for each are provided below via posted flyer/newsletter.

SUBMIT SAMPLE DOCUMENTS OF THE PUBLIC PARTICIPATION METHODS YOUR AGENCY USES. For example: Brochures, flyers, posters, multi-media CD or DVD, web-based blogs, community-based TV etc.



Palolo Chinese Home invites you to our Chinese New Year Celebration!

Sunday, February 10, 2019
10:30 am - 1:00 pm

2459 10th Avenue
in lush Palolo Valley

Free valet parking!

Usher in the Year of the Boar!

A New Year's Blessing

Fill your new year with an abundance of gratitude, respect and love! Join us for a special blessing by Jay Jarman, co-executive director of Common Grace.

Chinese Lion Dance

Gongs, drums and firecrackers! Get ready to feed the lion for good luck throughout the year! Presented by Gee Yung International Dragon and Lion Dance Association.

\$10 Chinese Lunch

Receive a plate full of local favorites: roast pork with buns, jai, gao, chow mein, Chinese chicken salad, and rice. Please contact Palolo Chinese Home by Jan. 26, 2019 to reserve your lunch plates at (808) 748-4904 or info@palolohome.org.

Country Bazaar

Find great bargains at the country bazaar, led by the Palolo Chinese Home Women's Auxiliary. Proceeds benefit Palolo Chinese Home.

Author Gerry Yahata

Hear an uplifting, inspiring presentation on caregiving by Gerry Yahata, author of the book, "The Spirit in Caregiving," and receive a complimentary signed copy.

Guided Tours

Take a tour of Palolo Chinese Home and learn about the full range of care options for seniors, including senior day care, adult residential care, skilled nursing and rehabilitation services, in-home care, and our new outpatient rehab services!



PALOLO CHINESE HOME

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29th Annual PCH Dynasty Invitational Golf Tournament

Friday, May 10, 2019

Ala Wai Municipal Golf Course

Tee off at 12 noon | Awards Banquet to follow

Get Ready for a Great Day of Golf!

Palolo Chinese Home's golf tournament next year will be better than ever. Plan to join us as a sponsor and put together a team. There will be more opportunities to network with great people, play a great game of golf, and enjoy great food. There will also be opportunities to win prizes and enter lucky number drawings. Sponsorships range from \$350 to \$5,000.

New for 2019

Your organization will have the opportunity to "Adopt A Hole." Sign up early. A team of volunteers from your organization will be able to network with more than 200 golfers as well as our staff and volunteers at your designated hole.

Golf Tournament Sponsorship Form

Watch for the official golf tournament sponsorship form in the mail in early February 2019.

Questions?

Contact **Aiza Pobre** at (808) 748-4904 or golf@palolohome.org.

Have a safe, happy holiday season!



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PALOLO CHINESE HOME

Better Care • Better Lives

Paul Tanoue:

A Caregiver's Journey Leads to Palolo Chinese Home

Caring for an aging parent can be a tough. For many in Hawaii, there's an unspoken understanding that adult children will take care of their aging parents. However, that sense of family duty doesn't mean it's an easy road.

Paul Tanoue knows all about this from firsthand experience. He was enjoying a thriving career as an information technology sales engineer in Torrance, California, but during his frequent phone calls to his mother in Hawaii, he could sense something wasn't quite right.

Pivotal Caregiver Decision

With his younger brother living and working in Japan, there was no one to care for his mother in Hawaii. Paul and his family made the decision to pack up and return to Hawaii in 2012 to take care of his mom.

After visiting a number of doctors, Paul's mom was diagnosed with late-stage dementia, which explained her contentious behavior, such as accusing Paul of stealing her money.

It was an arduous, five-year journey of caregiving for his mom at home.



Paul Tanoue and his mom, Kazuko Tanoue, a Palolo Chinese Home resident; Kazuko Tanoue celebrates a birthday.

"During those five years, we did everything. As conditions progressed, it required more and more time to provide care for my mother. It got to the point where I had to bathe her, take two hours to feed her, she couldn't warm up her own food, she couldn't clean the house, we did her laundry," Paul said. "We had to take care of all of these things. Of course, I didn't do all of this alone; it was the support of my family that made all of this possible."



Putting Life on Hold

Paul said he had to temporarily set aside his career ambitions, forgo spending time on his daughter's

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Chief Executive Officer

Palolo Chinese Home is a private, 501(c)(3) non-profit charitable organization.

From its origins over a hundred years ago, Palolo Chinese Home has been open to all, regardless of race, religion, nationality, or ethnic origin. Palolo Chinese Home's mission is "to assist and care for elders and their families by providing a continuum of care that is professional and multi-disciplinary, in a culturally sensitive family setting."

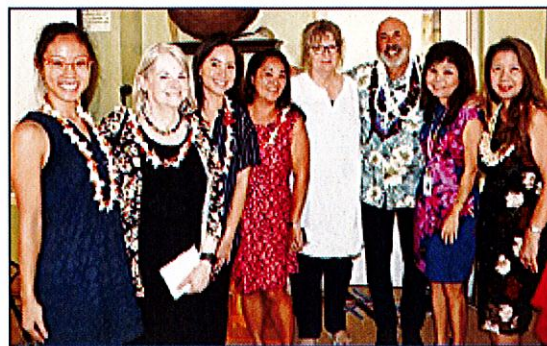
Palolo Chinese Home's newsletter is published for our families and friends.

Please send comments to:

Development Office
Palolo Chinese Home
2459 10th Avenue - Honolulu 96816
Email: info@palolohome.org

A Message from Our CEO**Community Education a Priority**

When those in our community learn how they can take charge of their own health and find out about the resources available to help them, seniors and family caregivers can be better equipped to manage change in their lives.



That's the premise behind Palolo Chinese Home's newest initiative to offer free community education. We believe we are filling an important need as nearly 150 signed up for our inaugural Palolo Senior Health and Wellness Day.

The panel consisted of those with whom I have worked over the years in response to a legislative initiative to take a closer look at how we can transform our system of care. It was a session packed with valuable information by experts from different fields. Even though I had heard the panelists before, I learned something new.

Suzanne Chun Oakland, former State Senator and now Program Coordinator of the Lanakila Multi-Purpose Senior Center, facilitated the discussion. The panelists included: Cynthia Arnold of De-Clutter Hawaii; Catherine Chao of Hawaii Pacific Neuroscience, who shared about the latest gene research to identify those at higher risk for Alzheimer's dementia; Jody Mishan of Hawaii Alzheimer's Disease Initiative at the University

of Hawaii Center on Aging; Dave Nassaney, the Caregiver's Caregiver, best-selling author, speaker, radio host, and entrepreneur, who has served as the caregiver for his wife who suffered a massive stroke more than 20 years ago; Margaret (Peggy) Perkinson, PhD, Director of the University of Hawaii Center on Aging, on vision and hearing care; and Lisa Duong Taniguchi, AuD, CCC-A, Assistant Professor & Clinic Coordinator with the Department of Communication Sciences & Disorders at the UH John A. Burns School of Medicine.

Mahalo to Speaker Emeritus Calvin Say, Speaker of the House Scott Saiki, and Councilmember Ann Kobayashi for their support.

The response and evaluations were overwhelmingly positive and we plan to make this an annual event for the community. Watch for more details!

Darlene Nakayama
Chief Executive Officer

Paul Tanoue:

A Caregiver's Journey Leads to Palolo Chinese Home

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school activities, and put family vacations on hold.

Despite the challenges, he never gave up. He attributes his tenacity to his Asian upbringing.

"I'm the oldest in the family, and as the oldest in the family, it is an obligation to take care of your parents. That culture was instilled in me from the time I was a child. That's how my mother was raised, and that's how she raised me," Paul said.

Practical Advice

"You need to have a certain amount of passion and willingness to be a caregiver; otherwise, it will be stressful," Paul said, noting that caregiving is like a full-time, volunteer job. "It's like raising a child. There will be good and bad times. You have to accept the bad. Anything you do with passion, I feel, will allow you to produce 150% to 200% of the results without feeling the stress."

Taking care of his mom at home was also important to Paul because he wanted to avoid multiple admissions and discharges at different facilities as his mom's condition changed. He thought it would be too taxing and confusing for his mom to change facilities, so he kept her at home for as long as possible with support from the Palolo Wellness Program, which offers in-home care.



Kazuko Tanoue at Christmas.



The Big Move

Paul continued to care for his mom at home until she needed care around the clock on a permanent basis. Fortunately, she was also able to qualify for Medicaid to pay for the cost of the care she now receives.

When she first moved into Palolo Chinese Home's skilled nursing facility, Paul would spend time feeding her and making sure she was fully acclimated into her new home

environment. After three months, Paul felt much more comfortable leaving his mom and entrusting her care to the capable hands of Palolo Chinese Home's nursing staff.

Today, Paul is now able to devote more attention to his business and his daughter, and appreciates the care his mom, now 89, receives from the Palolo Chinese Home team. He also freely shares his experiences to support others in their caregiving journey. ☺

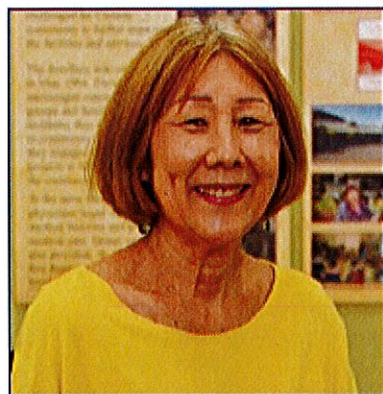
Don't be Shy about Asking for Help

Paul Tanoue offers the following advice to prospective families interested in Palolo Chinese Home: "In a nutshell, Palolo Chinese Home is a one-stop shop for the care you will need. They have senior day care, home meal delivery service, intermediate nursing care, rehab services, everything you possibly will need. They also have respite care if you want to take a family vacation. They have a lot of things to alleviate the challenges of caregiving. You should take advantage of any break you can take without the worry or concerns about your parent."

Palolo resident Karen Leo

Finding Great Care Right in Her Own Neighborhood

Many who have lived in Honolulu have heard of Palolo Chinese Home. It's a familiar name. But like most families, they may not know what Palolo Chinese Home actually provides until their services are needed. That's when most are relieved and even glad that Palolo Chinese Home is there.



Everything Blossomed

"I've lived in Palolo Valley all my years here, so I knew about Palolo Chinese Home. It wasn't until my son Mark met Palolo Chinese Home's CEO Darlene Nakayama while they were both serving on the Palolo neighborhood board that everything blossomed. Ever since then, it's been wonderful," Karen said.

Like a Second Home

Palolo Chinese Home is now like a second home whether her mom is admitted for rehab services or attending the senior day care program. It's just minutes away — practically in her backyard.



Left photo: Jane Tanaka. **Top Right:** Matthew and Mark Leo, who help their mom with caregiving. **Bottom Right:** Karen and Mark Leo at his installation as Potentate of the Shriners of the Aloha Temple.



Even Karen's mom, Jane Tanaka, 91 years old, is now an ardent fan of Palolo Chinese Home ever since she experienced firsthand the services, excellent attention and care, and friendly staff since January 2018.

"Once we get to the ER, Mom will say, 'Remember now, I want to go to Palolo Chinese Home for rehab.' We're at the point where she can go to senior day care as well. It's wonderful, going to both day care and rehab."

The feeling is mutual. "The CNAs welcome her back and the rest of the staff is just wonderful," Karen said.

Karen's mom recently started receiving hospice care while staying at the skilled nursing wing,

another service offered at Palolo Chinese Home.

Helping Family Caregivers

Karen is like many other family caregivers. She had been caring for her dad at home until he passed away two years ago at the age of 93. Karen was also working full-time at Carousel Candyland in Kahala Mall, where she has been for the past 22 years. She continues to work while also serving as the primary caregiver for her mom.

Her sons, Mark and Matthew, also help with taking care of Grandma as much as they can, and Karen's sister also pitches in with caregiving duties once a week.

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Care in Her Own Neighborhood

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However, Karen takes it all in stride, and there is a sense of honor in caring for her mom.

"You have to do what you have to do to make their lives wonderful," said Karen, referring to caring for elder loved ones.

Karen also noted that her parents welcomed her and her two sons into their home during a transition when they relocated back to Hawaii from New Jersey years ago, and she has never forgotten the

kindness her parents showed to her.

And now Palolo Chinese Home has welcomed Karen and her mom with open arms to provide the care they need for a great quality of life.

Note: We are sad to report that Jane Tanaka passed away on September 13, and our sympathy and condolences go out to the Leo family. The Palolo Chinese Home team is honored to have such a beautiful, appreciative woman. 🙏

United Way



Aloha United Way

When you give to Aloha United Way, please consider designating Palolo Chinese Home as a beneficiary of your gift. Be sure to donate to:

#96410

You can be a game changer!
Together, we can change lives!

Sharing about the Good Life with Seniors

The Palolo Chinese Home team shared about our full range of care options at the 34th annual Good Life Expo, Hawaii Seniors' Fair at the Blaisdell Exhibition Hall from Sept. 21 to 23.

The expo provided opportunities to

engage with hundreds of interested seniors and family caregivers. It was also a time to listen and learn about their needs and concerns to understand how we can better serve them.

Mahalo to all of the Palolo Chinese Home employees and volunteers who dedicated their weekend to raising awareness about our service offerings available on campus and in the home. 🙏



Taking Care of Palolo Chinese Home's Employees

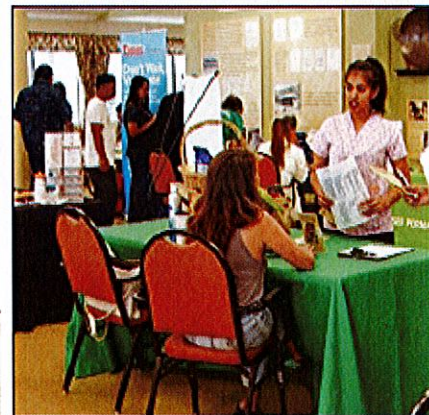
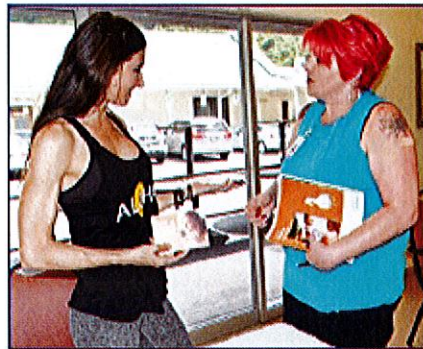
Being able to provide better care and better lives for seniors and their families starts with taking care of those who provide the care: the employees of Palolo Chinese Home.

Palolo Chinese Home invited a number of organizations for a health fair at Farm Hall on Oct. 2 to share their knowledge and experiences with employees.

The organizations covered a variety of programs, including insurance providers, fitness and wellness groups, and even a delivery company that connects subscribers to locally grown produce.

Self-care, the act of making time to care of yourself—body, mind and soul—is especially important for those in healthcare. Healthcare professionals continually give so much of themselves to make sure residents or clients are comfortable and receiving good care but often neglect their own health and well-being.

Mahalo to Lauren Kagihara, Human Resources Manager, and the HR team for coordinating the health fair for Palolo Chinese Home employees! 🙏



Giving Wisely at 2018 Year End

For more than 100 years, the generous support of donors has helped to ensure Palolo Chinese Home's facilities, programs and services meet the growing and changing care needs of Hawaii's elders. Year-end gifts are an important part of this tradition. Here are two suggested ways to make the most of your support personally, and for Palolo Chinese Home.



1 Make a Gift at Reduced Cost with Appreciated Securities

If you have securities you have owned for more than a year, you may want to lock in their value by giving some to charity. Giving appreciated securities directly to charities instead of cash can result in a double tax benefit that reduces the cost of your gift:

- a federal income tax deduction for the full fair market value if you itemize deductions
- no tax owed on the capital gain you would pay if you sold them

For instructions on making gifts of appreciated securities to Palolo Chinese Home, please visit palolohome.org and click on the GIVE tab.

2 Give Immediate Support to Our Seniors with a Tax-Wise Gift From an IRA

If you are 70½ or older and have an individual retirement account (IRA), you have to take a required minimum distribution out of the account every year. Further, these

distributions count as taxable income to you.

Did you know that you can make charitable gifts directly from your IRA to one or more public charities, like Palolo Chinese Home, and that these charitable gifts count as *part of your required minimum distribution, but not as taxable income to you?* This is a very beneficial way to make your charitable contributions, especially if you don't itemize deductions on your tax return.

You can give up to \$100,000 to charities in this way in any year, but you can also make a number of smaller gifts. It is important to remember that the charitable distributions must go directly from your IRA to the charities.

If you withdraw the funds yourself and then give them to charities, they will count as income to you and could increase your taxes. So please do ask your account administrator to send the

contributions directly to the charities you wish to support.

For instructions on making charitable contributions from your IRA, go to palolohome.org and click on the GIVE tab and read about the Charitable IRA Rollover.

For more information on these opportunities, please contact Darlene Nakayama, in confidence, at dnakayama@palolohome.org or (808) 748-4901.

Thank you for your thoughtfulness and generosity! 🙏

Note: Because everyone's situation is different, Palolo Chinese Home encourages you to seek professional legal, estate planning, and financial advice before deciding on a course of action. This information does not constitute legal or financial advice and should not be relied upon as a substitute for professional advice.



PALOLO CHINESE HOME

Better Care · Better Lives

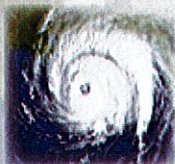
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E-Mail: info@palolohome.org
Website: www.palolohome.org
Federal Tax ID# 99-0073321

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HONOLULU, HI

The blessing of "long life" is universally celebrated. At Palolo Chinese Home, the Chinese character for longevity (shou) has long been used as our symbol. By adding two brush strokes, the artist, the late Clarence Lee, incorporated the Chinese character for people or mankind (ren), and the result is an image of a roof embracing long life — our wish for you.

The unbroken circle signifies our mission of continuous care and respect for our kupuna (elders).

Ready for Natural Disasters



The Palolo Chinese Home team proved they are ready, capable and fearless when it

comes to protecting residents and staff and ensuring Palolo Chinese Home can continue to operate without any major disruptions in the face of a hurricane.

Hurricane Lane started approaching the islands with full force in early August, but by late that month had been downgraded to a tropical storm. Fortunately, the final result was only moderate rain showers on Oahu.


The intense preparation required constant vigilance and daily meetings. Palolo Chinese Home's emergency response plan was fully activated and,

by all indications, worked exactly as planned. Ensuring there was sufficient food, water, and access to electricity were top priorities. This gave greater peace of mind for everyone.

"We tested our generators and ordered extra food and other supplies. We had eight 55-gallon drinkable water drums and numerous other non-drinkable water drums strategically stationed throughout our facility. We also topped off our propane and diesel tanks to ensure we could continue to cook and carry on our other operations," said Kevin Wu, Palolo Chinese Home's Administrator. "In addition, we cleared our campus of any loose debris and secured all areas to prepare for potential floods and strong winds, with water diverters set up in critical areas."

Mahalo to Brian Lim, Environmental Services Manager, and his team for rapidly undertaking the majority of these emergency tasks.

As a precaution, the Senior Day Care program was temporarily closed so that seniors could remain safely at home. This enabled the Senior Day Care staff to shift their attention to supporting the skilled nursing and care home residents. Some staff even camped out at Palolo Chinese Home to be ready to respond in the event of a storm.

As with all emergency response plans, there is always room for improvement, and as part of the post-disaster activities, the Palolo Chinese Home team is now fine-tuning policies and procedures to be ready for the next major event. 

Limited English Proficiency Plan

FTA 5310

Limited English Proficiency
(LEP) Plan



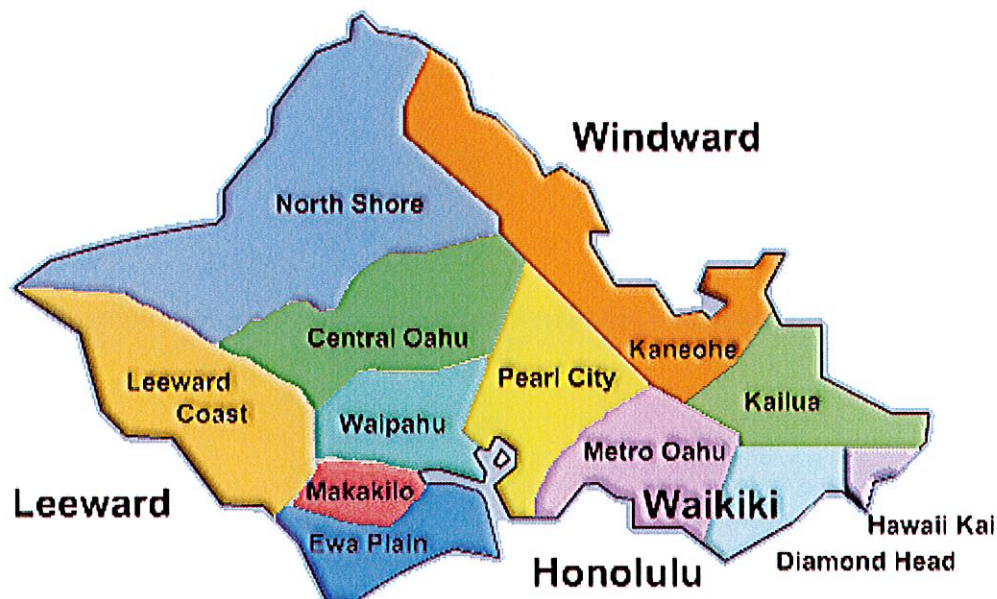
PALOLO CHINESE HOME
Better Care. Better Lives

The **Palolo Chinese Home** has developed the following LEP Plan to help identify reasonable steps to provide language assistance for LEP persons seeking meaningful access to the **Palolo Chinese Home** programs, services, or activities as required by Executive Order 13166. An LEP person is one who does not speak English as their primary language, and who has a limited ability to read, speak, write, or understand English.

This plan details procedures on how to identify a person who may need language assistance, the ways in which assistance may be provided, training to staff, notification to LEP persons that assistance is available, and information for future plan updates. In developing the plan while determining the **Palolo Chinese Home** extent of obligation to provide LEP services, the **Palolo Chinese Home** undertook a USDOT's four-factor LEP analysis which considers the following:

- (1) The number or proportion of LEP persons eligible in the **Palolo Chinese Home** service area who may be served or likely to encounter by the **Palolo Chinese Home** program, activities, or services.

ISLAND OF OAHU



Palolo Chinese Home services clientele throughout the Island of Oahu. **Palolo Chinese Home** has been helping Hawaii families find an appropriate level of care for their loved one and the growing demand for long term care. **Palolo Chinese home** works with different companies such as Hospitals, Long Term Care, Hospices, Rehab and Social works on Admissions and Discharges. **Palolo Chinese Home** does not discriminate, we provide care to those who are in need. There are staff who are able to speak different language if need to provide for our Residents & visitors. Please see list of Bilingual Staff

on Page 26. Language Access Flyer is also posted in all department visible to everyone. Palolo Chinese Home also have Policies and Procedures based on the follow:

- *Communication with persons with limited English Proficiency
- *Auxiliary Aids and service for persons with disabilities
- *Notice to Program Accessibility
- *Grievance Procedure

This Policies and procedures are also attached.

- (2) The frequency with which LEP individuals come in contract with the **Palolo Chinese Home** services.
- (3) The nature and importance of the program, activities or services provided by the **Palolo Chinese Home** to the LEP population.
- (4) The resources available to the **Palolo Chinese Home** and overall costs to provide LEP assistance. A brief description of these considerations is provided in the following section.

Safe Harbor Provision

The **Palolo Chinese Home** complies with the Safe Harbor Provision, as evidenced by the number of documents available in the Spanish (for example) LEP language. With respect to Title VI information, the following shall be made available in Spanish (for example) LEP:

- (1) Title VI Notice
- (2) Complaint Procedures
- (3) Complaint Form

In addition, we will conduct our marketing (including using translated materials) in a manner that reaches each LEP group. Vital Documents include the following:

- (1) Notices of free language assistance for persons with LEP
- (2) Notice of Non-Discrimination and Reasonable Accommodation
- (3) Outreach Materials
- (4) Your Agency's Bus Schedules
- (5) Route Changes
- (6) Public Hearings

PROVIDE SAMPLE DOCUMENTS OF THE TYPES OF SERVICES YOUR AGENCY PROVIDES FOR LEP INDIVIDUALS.

Palolo Chinese Home have bilingual employees who are able to translate. Here is a list of different languages that can be translated:

Employee's Name	Position	Language
Juvy Requilman	Admission Coordinator	Tagalog
Gloria Liu	Licensed Practical Nurse	Cantonese
Brian Lim	Environmental Services Manager	Korean
Jittima Amazaki	Central Supply Clerk	Thai
Hansel Purugganan	Admission Coordinator	Ilokano
Naomi Matsuda	MDS Coordinator	Japanese
Jasmine Xu	Registered Nurse	Cantonese

PALOLO CHINESE HOME

_____ PHILOSOPHY	DEPARTMENT	<u>Administration</u>
_____ OBJECTIVES	ORIGINATION DATE	<u>3.7.08</u>
_____ POLICY	REVISED DATE	<u>3.18.08</u>

REVIEWED/REVISED BY: Darlene H. Nakayama, RN, NHA

Subject: COMMUNICATION WITH PERSONS WITH LIMITED ENGLISH PROFICIENCY

Policy

Palolo Chinese Home will take reasonable steps to ensure that persons with Limited English Proficiency (LEP) have meaningful access and an equal opportunity to participate in our services, activities, programs and other benefits. The policy of *Palolo Chinese Home* is to ensure meaningful communication with LEP patients/clients and their authorized representatives involving their medical conditions and treatment. The policy also provides for communication of information contained in vital documents, including but not limited to, waivers of rights, consent to treatment forms, financial and insurance benefit forms, etc. All interpreters, translators and other aids needed to comply with this policy shall be provided without cost to the person being served, and patients/clients and their families will be informed of the availability of such assistance free of charge.

Language assistance will be provided through use of competent bilingual staff, staff interpreters, contracts or formal arrangements with local organizations providing interpretation or translation services, or technology and telephonic interpretation services. All staff will be provided notice of this policy and procedure, and staff that may have direct contact with LEP individuals will be trained in effective communication techniques, including the effective use of an interpreter.

Palolo Chinese Home will conduct a regular review of the language access needs of our patient population, as well as update and monitor the implementation of this policy and these procedures, as necessary.

Procedure

1. IDENTIFYING LEP PERSONS AND THEIR LANGUAGE

Palolo Chinese Home will promptly identify the language and communication needs of the LEP person. If necessary, staff will use a language identification card (or "I speak cards," available online at www.lep.gov) or posters to determine the language. In addition, when records are kept of past interactions with patients (clients/residents) or family members, the language used to communicate with the LEP person will be included as part of the record.

2. OBTAINING A QUALIFIED INTEPRETER

Administrator, 808-737-2555, is responsible for:

- (a) Maintaining an accurate and current list showing the name, language, phone number and hours of availability of bilingual staff (*see list*);

(b) Contacting the appropriate bilingual staff member to interpret, in the event that an interpreter is needed, if an employee who speaks the needed language is available and is qualified to interpret;

(c) Obtaining an outside interpreter if a bilingual staff or staff interpreter is not available or does not speak the needed language. Bilingual Access Line has agreed to provide qualified interpreter services. The agency's telephone number is 526-9724, and the hours of availability are 24 hours a day.

Some LEP persons may prefer or request to use a family member or friend as an interpreter. However, family members or friends of the LEP person will not be used as interpreters unless specifically requested by that individual and after the LEP person has understood that an offer of an interpreter at no charge to the person has been made by the facility. Such an offer and the response will be documented in the person's file. If the LEP person chooses to use a family member or friend as an interpreter, issues of competency of interpretation, confidentiality, privacy, and conflict of interest will be considered. If the family member or friend is not competent or appropriate for any of these reasons, competent interpreter services will be provided to the LEP person.

Children and other clients/patients/residents will not be used to interpret, in order to ensure confidentiality of information and accurate communication.

3. PROVIDING WRITTEN TRANSLATIONS

(a) When translation of vital documents is needed, each unit in *Palolo Chinese Home* will submit documents for translation into frequently-encountered languages to *Administrator*. Original documents being submitted for translation will be in final, approved form with updated and accurate legal and medical information.

(b) Facilities will provide translation of other written materials, if needed, as well as written notice of the availability of translation, free of charge, for LEP individuals.

(c) *Palolo Chinese Home* will set benchmarks for translation of vital documents into additional languages over time.

4. PROVIDING NOTICE TO LEP PERSONS

Palolo Chinese Home will inform LEP persons of the availability of language assistance, free of charge, by providing written notice in languages LEP persons will understand. At a minimum, notices and signs will be posted and provided in intake areas and other points of entry, including but not limited to the emergency room, outpatient areas, nursing home, care home, day care, etc. Notification will also be provided through one or more of the following: outreach documents, telephone voice mail menus, local newspapers, radio and television stations, and/or community-based organizations.

5. MONITORING LANGUAGE NEEDS AND IMPLEMENTATION

On an ongoing basis, *Palolo Chinese Home* will assess changes in demographics, types of services or other needs that may require reevaluation of this policy and its procedures. In addition, *Palolo Chinese Home* will regularly assess the efficacy of these procedures, including but not limited to mechanisms for securing interpreter services, equipment used for the delivery of language assistance, complaints filed by LEP persons, feedback from patients and community organizations, etc.

PALOLO CHINESE HOME

_____ PHILOSOPHY	DEPARTMENT	<u>Administration</u>
_____ OBJECTIVES	ORIGINATION DATE	<u>3.7.08</u>
_____ POLICY	REVISED DATE	<u>9.24.08</u>

REVIEWED/REVISED BY: Darlene H. Nakayama, RN, NHA

Subject: **AUXILIARY AIDS AND SERVICES FOR PERSONS WITH DISABILITIES**

Policy

Palolo Chinese Home will take appropriate steps to ensure that persons with disabilities, including persons who are deaf, hard of hearing, or blind, or who have other sensory or manual impairments, have an equal opportunity to participate in our services, activities, programs and other benefits. The procedures outlined below are intended to ensure effective communication with patients/clients involving their medical conditions, treatment, services and benefits. The procedures also apply to, among other types of communication, communication of information contained in important documents, including waivers of rights, consent to treatment forms, financial and insurance benefits forms, etc. All necessary auxiliary aids and services shall be provided without cost to the person being served.

All staff will be provided written notice of this policy and procedure, and staff that may have direct contact with individuals with disabilities will be trained in effective communication techniques, including the effective use of interpreters.

Procedure

1. Identification and assessment of need:

Palolo Chinese Home provides notice of the availability of and procedure for requesting auxiliary aids and services through notices in our brochures, handbooks, letters, print/radio /television advertisements, etc. and through notices posted (in waiting rooms, lobbies, etc.). When an individual self-identifies as a person with a disability that affects the ability to communicate or to access or manipulate written materials or requests an auxiliary aid or service, staff will consult with the individual to determine what aids or services are necessary to provide effective communication in particular situations.

2. Provision of Auxiliary Aids and Services:

Palolo Chinese Home shall provide the following services or aids to achieve effective communication with persons with disabilities:

A. For Persons Who Are Deaf or Hard of Hearing

- (i) For persons who are deaf/hard of hearing and who use sign language as their primary means of communication, the Administrator, 808-737-2555, is responsible for providing effective interpretation or arranging for a qualified interpreter when needed.

In the event that an interpreter is needed, the Administrator is responsible for:

(ii) Communicating by Telephone with Persons Who Are Deaf or Hard of Hearing.

The Palolo Chinese Home has made arrangements to share a TDD when it is determined by staff that a TDD is needed, and will contact Sprint Telecommunications Relay Service at 925 Dillingham Blvd., 1-866-835-8169.

(iii) For the following auxiliary aids and services, staff will contact Administrator, 808-737-2555, who is responsible to provide the aids and services in a timely manner:

Note-takers; computer-aided transcription services; telephone handset amplifiers; written copies of oral announcements; assistive listening devices; assistive listening systems; telephones compatible with hearing aids; closed caption decoders; open and closed captioning; telecommunications devices for deaf persons (TDDs); videotext displays; or other effective methods that help make aurally delivered materials available to individuals who are deaf or hard of hearing.

(iv) Some persons who are deaf or hard of hearing may prefer or request to use a family member or friend as an interpreter. However, family members or friends of the person will not be used as interpreters unless specifically requested by that individual and after an offer of an interpreter at no charge to the person has been made by the facility. Such an offer and the response will be documented in the person's file. If the person chooses to use a family member or friend as an interpreter, issues of competency of interpretation, confidentiality, privacy and conflict of interest will be considered. If the family member or friend is not competent or appropriate for any of these reasons, competent interpreter services will be provided.

NOTE: Children and other residents will not be used to interpret, in order to ensure confidentiality of information and accurate communication.

B. For Persons Who are Blind or Who Have Low Vision

(i) Staff will communicate information contained in written materials concerning treatment, benefits, services, waivers of rights, and consent to treatment forms by reading out loud and explaining these forms to persons who are blind or who have low vision [in addition to reading, this section should tell what other aids are available, where they are located, and how they are used].

The following types of large print, taped, Brailled, and electronically formatted materials are available: made available as needed through the Library for the Blind and Physically Handicapped at 733-8444. These materials may be obtained by calling Administrator, 808-737-2555.

(ii) For the following auxiliary aids and services, staff will contact Administrator, 808-737-2555, who is responsible to provide the aids and services in a timely manner: Qualified readers; reformatting into large print; taping or recording of print materials not available in alternate format; or other effective methods that help make visually delivered materials available to individuals who are blind or who have low vision. In addition, staff is available to assist persons who are blind or who have low vision in filling out forms and in otherwise providing information in a written format.

- C. For Persons With Speech Impairments
To ensure effective communication with persons with speech impairments, staff will contact Administrator, 808-737-2555, who is responsible to provide the aids and services in a timely manner: Writing materials; typewriters; TDDs; computers; flashcards; alphabet boards; communication boards; and other communication aids.
- D. For Persons With Manual Impairments
Staff will assist those who have difficulty in manipulating print materials by holding the materials and turning pages as needed, or by providing one or more of the following: note-takers; computer-aided transcription services; speaker phones; or other effective methods that help to ensure effective communication by individuals with manual impairments. For these and other auxiliary aids and services, staff will contact Administrator, 808-737-2555, who is responsible to provide the aids and services in a timely manner.
- E. Interpreting and Sign Language
Administrator will call:

Hawaii Interpreting Services
P.O. Box 734
Kaneohe, Hawaii 96744
(808) 394-7706
www.interpretinghawaii.com

PALOLO CHINESE HOME

_____ PHILOSOPHY	DEPARTMENT	<u>Administration</u>
_____ OBJECTIVES	ORIGINATION DATE	<u>3.7.08</u>
_____ POLICY	REVISED DATE	<u>3.18.08</u>

REVIEWED/REVISED BY: Darlene H. Nakayama, RN, NHA

Subject: SECTION 504 NOTICE OF PROGRAM ACCESSIBILITY

The regulation implementing Section 504 requires that an agency/facility " ...*adopt and implement procedures to ensure that interested persons, including persons with impaired vision or hearing, can obtain information as to the existence and location of services, activities, and facilities that are accessible to and usable by disabled persons.*" (45 C.F.R. §84.22(f))

Palolo Chinese Home and all of its programs and activities are accessible to and useable by disabled persons, including persons who are deaf, hard of hearing, or blind, or who have other sensory impairments. Access features include:

- Convenient off-street parking designated specifically for disabled persons.
- Curb cuts and ramps between parking areas and buildings.
- Level access into first floor level with elevator access to all other floors.
- Fully accessible offices, meeting rooms, bathrooms, public waiting areas, cafeteria, patient treatment areas, including examining rooms and patient wards.
- A full range of assistive and communication aids provided to persons who are deaf, hard of hearing, or blind, or with other sensory impairments. There is no additional charge for such aids. Some of these aids include:
 - Qualified sign language interpreters for persons who are deaf or hard of hearing.
 - A twenty-four hour (24) telecommunication device (TTY/TDD) which can connect the caller to all extensions within the facility and/or portable (TTY/TDD) units, for use by persons who are deaf, hard of hearing, or speech impaired.
 - Readers and taped material for the blind and large print materials for the visually impaired.
 - Flash Cards, Alphabet boards and other communication boards.
 - Assistive devices for persons with impaired manual skills.

If you require any of the aids listed above, please let the receptionist or your nurse know.

PALOLO CHINESE HOME

_____ PHILOSOPHY	DEPARTMENT	<u>Administration</u>
_____ OBJECTIVES	ORIGINATION DATE	<u>3.7.08</u>
_____ POLICY	REVISED DATE	<u>3.18.08</u>

REVIEWED/REVISED BY: Darlene H. Nakayama, RN, NHA

Subject: Section 504 GRIEVANCE PROCEDURE

Policy

It is the policy of *Palolo Chinese Home* not to discriminate on the basis of disability. *Palolo Chinese Home* has adopted an internal grievance procedure providing for prompt and equitable resolution of complaints alleging any action prohibited by Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794) or the U.S. Department of Health and Human Services regulations implementing the Act. Section 504 states, in part, that "no qualified handicapped person shall, on the basis of handicap, be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any program or activity which receives or benefits from Federal financial assistance." The Law and Regulations may be examined in the office of Administrator, 808-737-2555, who has been designated to coordinate the efforts of *Palolo Chinese Home* to comply with Section 504.

Any person who believes she or he has been subjected to discrimination on the basis of disability may file a grievance under this procedure. It is against the law for *Palolo Chinese Home* to retaliate against anyone who files a grievance or cooperates in the investigation of a grievance.

Procedure

Grievances must be submitted to the Administrator within 1 day of the date the person filing the grievance becomes aware of the alleged discriminatory action.

A complaint must be in writing, containing the name and address of the person filing it. The complaint must state the problem or action alleged to be discriminatory and the remedy or relief sought.

The Administrator shall conduct an investigation of the complaint. This investigation may be informal, but it must be thorough, affording all interested persons an opportunity to submit evidence relevant to the complaint. The Section 504 Coordinator will maintain the files and records of *Palolo Chinese Home* relating to such grievances.

The Administrator will issue a written decision on the grievance no later than 30 days after its filing.

The person filing the grievance may appeal the decision of the Section 504 Coordinator by writing to the Administrator within 15 days of receiving the Section 504 Coordinator's decision.

The Administrator shall issue a written decision in response to the appeal no later than 30 days after its filing.

The availability and use of this grievance procedure does not prevent a person from filing a complaint of discrimination on the basis of disability with the U. S. Department of Health and Human Services, Office for Civil Rights.

Palolo Chinese Home will make appropriate arrangements to ensure that disabled persons are provided other accommodations if needed to participate in this grievance process. Such arrangements may include, but are not limited to, providing interpreters for the deaf, providing taped cassettes of material for the blind, or assuring a barrier-free location for the proceedings. The Administrator will be responsible for such arrangements.

Non-elected Committees Membership Table

A sub-recipient who selects the membership of transit-related, non-elected planning boards, advisory councils, or committees must provide a table depicting the membership of those organizations broken down by race. Sub-recipients also must include a description of the efforts made to encourage participation of minorities on these boards, councils, and committees.

Table Depicting Membership of Committees, Councils, Broken Down by Race

Body	Caucasian	Latino	African American	Asian American	Native American	Native Hawaiians	Pacific Islanders
Eric K. Watanabe, CPA				X			
Douglas C. Smith, Esq.	X						
Walton K.T. Shim, MD, FACS				X			
Dick Oshima, CPA				X			
Patricia A.L. Blanchette, M.D.	X						
Lester K. M. Leu				X			
Gordon S.K. Au				X			
Frances H. Goo				X			
Roger K.S. Liu, CPA				X			
Peter Backus, CFA	X						
Anthony J.H. Ching				X			
Peter C.F. Fong, Esq.				X			
Andrew M.O. Moats				X			
J.P. Schmidt, Esq.	X						
Dana-Ann S. Takushi				X			
Lawrence K.W. Tseu, DDS				X			
Reginald K.T. Yee, Esq.				X			
Gladys K. Lee				X			
Darlene H. Nakayama				X			
Russell J. Iau				X			
Tyler Tokioka				X			
Gene Tsuji				X			
Jane Kikuchi				X			
David J. Gierlach	X						

Describe the process the agency uses to encourage the participation of minorities on such Committees:

The **Palolo Chinese Home** does **NOT** select the membership of any transit-related committees, planning boards, or advisory councils.

Monitoring for 5310 Sub-Recipient Title VI Compliance

HDOT will monitor 5310 sub-recipients' compliance with FTA Title VI requirements. Oversight includes periodic on-site visits, review of submitted Title VI Plans, review of Title VI training programs and sub-recipient's agency-conducted surveys etc.

Palolo Chinese Home

1. Submits its Title VI Plan every three (3) years.
2. Submits its Title VI Plan which has been approved by a governing entity or highest Authority of the agency.
3. Conducts Title VI Training for all employees. Documents its training program (date, attendance, topic(s) covered, number of hours per topic per session, lecture, video lesson etc.).
4. Conducts Title VI Training for all FTA defined Safety-Sensitive Employees. Documents its training program. (date, attendance, topic(s) covered, number of hours per topic per session, lecture, video lesson etc.).
5. Posts its Notice of Rights Under Title VI Notices in FTA funded vehicles.
6. Posts its Notice of Rights Under Title VI Notices in office and other publicly accessible places, including group meetings and other informational gatherings for its clients, and general public.
7. Posts its Notice of Rights Under Title VI Notices on agency website, brochures, bulletins, etc.
8. Describes how it monitors Title VI compliance by its officers, and employees.
9. Keeps records of discrimination complaints, and resolutions, etc.
10. Conducts surveys of clients, community, coordinated services to assess the level and effectiveness of ensuring non-discrimination.

Title VI Training

DESCRIBE HOW YOUR AGENCY TITLE VI COORDINATORS, AND STAFF ARE TRAINED IN TITLE VI. Please list trainings attended in the last year as well as upcoming trainings that will be attended (provide date, site location, attendance sheets, topic etc.). These include online webinars, online classes, trade shows, industry related seminars dealing with Title VI, LEP, and Environmental Justice content.

Training will occur upon hire and annually.

1. Employee are required to watch the 30 min. video on **Understanding and Abiding by Title VI of the Civil Rights Act of 1964**
<https://www.youtube.com/watch?v=lw0mefqIZ5Y>
2. Training will be coordinated by Human Resources and Administration.
3. Training will be recorded and documented

4. Conducts Title VI Training for all employees. Documents its training program (date, attendance, topic(s) covered, number of hours per topic per session, lecture, video lesson etc.).

Employee	Drivers License #	Training Date	Video Lesson	Acknowledgment
Brian Lim	H00183738	1/10/19	X	X
Rafael De Peralta	H00861498	1/11/19	X	X
Rachel Agustin	H00880024	1/16/19	X	X
Darlene Nakayama	H00728015	1/10/19	X	X
Aiza Pobre	H00632396	1/10/19	X	X
Mylene Ignacio	H00521815	1/9/19	X	X
Jittima Amazaki	D4948562	1/10/19	X	X
Jack Kishaba	H00231259	1/11/19	X	X
Mark Kanemuraa	H00229604	1/10/19	X	X
Reid Tanibe	H00224159	1/10/19	X	X

Title VI Equity Analysis

A Title VI Equity Analysis is only required if the sub-recipient is planning to acquire land upon which to construct a facility or plans to construct a facility. Do not conduct the analysis unless you are planning to acquire land for this purpose or construct a facility.

A sub-recipient planning to acquire land to construct certain types of facilities must not discriminate on the basis of race, color, or national origin, against persons who may, as a result of the construction, be displaced from their homes or businesses. “Facilities” in this context does not include transit stations or bus shelters, but instead refers to storage facilities, maintenance facilities, and operation centers.

There are many steps involved in the planning process prior to the actual construction of a facility. It is during these planning phases that attention needs to be paid to equity and non-discrimination through equity analysis. The Title VI Equity Analysis must be done before the selection of the preferred site.

Even if facility construction is financed with non-FTA funds, if the sub-recipient organization receives any FTA dollars, it must comply with this requirement.

If the construction of the facility is funded with FTA funds, you may be subject to Environmental Justice (EJ), FTA Disadvantaged Business Enterprise (DBE), American with Disabilities Act (ADA) and Buy America requirements etc.

The **Palolo Chinese Home** has no current or anticipated plans to develop new transit facilities covered by these requirements. No facilities covered by these requirements were developed since **beginning of Palolo Chinese Home as an organization**. * Please delete the section below if it does not apply to your agency. If it does, please use the text narrative as shown below in Section A – C of this section.

Board Approval for the Title VI Program

Board of Director Meeting Minutes - Page 1 of 3, Monday, January 14, 2019



PALOLO CHINESE HOME
Better Care. Better Lives

Board of Directors Meeting
Minutes of Monday, January 14, 2019 5:30 pm
Alice Goldsmith Community Center (Farm Hall)

Present: Andrew Moats, Anthony Ching, Dick Oshima, Douglas Smith, Eric Watanabe (presiding), Frances Goo, Gladys Lee, Gordon Au, J.P. Schmidt, Lester Leu, Patricia Blanchette, Peter Fong, Reginald Yee, Roger Liu, Walton Shim, Tess Novio, Debbie Hiraoka, Darlene H. Nakayama, and Aiza Pobre (recording).

New Members: Tyler Tokioka, Jane Kikuchi, Gene Tsuji, David Gierlach

I. The meeting was called to order at 6:22 pm by E. Watanabe, President.

II. Introduction of New Members – Each board member welcomed and introduced themselves to the new board members.

III. Approval of November 12, 2018 meeting minutes (EW)

Motion: D. Smith moved and J.P Schmidt seconded the motion to approve the meeting minutes as circulated. The motion was unanimously approved.

IV. Election of Officers (DS) – waiver required

A. President & Chair	Eric Watanabe
B. First Vice President	Douglas Smith
C. Second Vice President	Walton Shim
D. Secretary	Pat Blanchette
E. Treasurer	Dick Oshima

Motion: L. Leu moved and T. Tokioka seconded the motion to approve the election of officers listed above to continue. The motion was unanimously approved.

V. Chief Executive Officer's Report – Darlene Nakayama (DN) – D. Nakayama added the following information to the attached CEO written report as circulated:

- A.** G. Crabbe could not get an attorney to represent her. She has filed another claim and we will know in February 2019 if court will accept her request.
- B.** L. Leu questioned whether the Hospice house fire alarm construction meets the required standards and if changes would affect PCH's insurance coverage. D. Nakayama reported that such changes must meet life safety codes and is signed off by the Honolulu Fire and Building Permit Departments. There should be no impact on PCH's insurance coverage.

VI. Administrator Report – Kevin Wu (KW) - D. Nakayama reported for K. Wu on the attached written Administrator's Report as circulated.

- VII. Financial Report –Tess Novio/Debbie Hiraoka (TN/DH)** – T. Novio reported on the attached written Financial Report summary and November 30, 2018 financial statements.

VIII. Old Business

- A.** L. Leu requested a report on PCH's implementation of the Our Care, Our Choice Act. D. Nakayama reported that the Healthcare Association of Hawaii has presented a draft policy and procedure for facilities who chose to implement or not implement the Act. B. Blanchette gave an update that to date, to her knowledge, no other facility other than Kaiser is planning to participate. She suggested that the best route for residents who wish to participate is to refer them to a hospice program for counseling about options. It is also expected that a medical aid in dying navigator program may develop in Hawaii as it has in Oregon, providing another potential source for counseling.
- D. Nakayama will circulate PCH's policy and procedure on the act and will include the topic for discussion at the next board meeting.

IX. New Business

A. Approval of Title VI Program

- D. Nakayama informed the board that we need approval of this plan to fulfil the requirements for the two vans that we received from the city using federal funds. This program does not discriminate people base on sex, age, race, color. PCH has trained staff, implemented policies/procedures and have posted required notices. Staff has been trained on how to take care of complaints and people who does not speak or understand English.
- R. Liu questioned if the Federal Work Stop have any effect on PCH. D. Hiraoka reported that there should be no affect and that payments should be made.
- E. Watanabe questioned on the type of license is required to operate the two vans. D. Nakayama reported that a regular licensure is the requirement.
- L. Leu was assured that this plan was established with the State of Hawaii, Department of Transportation personnel.

Motion: D. Smith moved and L. Leu seconded the motion to approve the plan. The motion was unanimously approved.

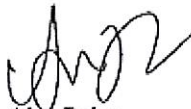
X. Announcements.

- A.** Next Executive Committee Meeting – Monday February 11, 2019 / 5:00 p.m. dinner; 5:30 p.m. meeting / Farm Hall Community Center
- B.** Chinese New Year Celebration – February 10, 2019, 10:30 a.m., lunch to follow, Farm Hall
- C.** Board of Directors Meeting – Monday, March 11, 2019 5:00 p.m. dinner, 5:30 p.m. meeting / Farm Hall Community Center
- D.** New Board of Directors Orientation – February 7, 2019, 11am to 1pm
 - A. Pobre will communicate with new members for orientation
- E.** Annual Golf Tournament - Friday, May 10, 2019/ Ala Wai Golf Course
 - L. Leu reported that golf committee will be emailing a list of sponsors/donors to the board members. He asked that the members review the list and to inform the committee if one has any contacts.
- F.** E. Watanabe announced the resignation of K. Wu and that PCH is looking for an Administrator.

G. D. Nakayama reported that A. Moats will be honored in the 2019 Alumni Awards & Scholarship Fundraiser – Thursday, April 11, 2019. More information will be forthcoming and D. Nakayama reported that PCH would like to reserve a table.

XI. With no further business, the meeting was adjourned at 7:02 pm by E. Watanabe.

Submitted by,



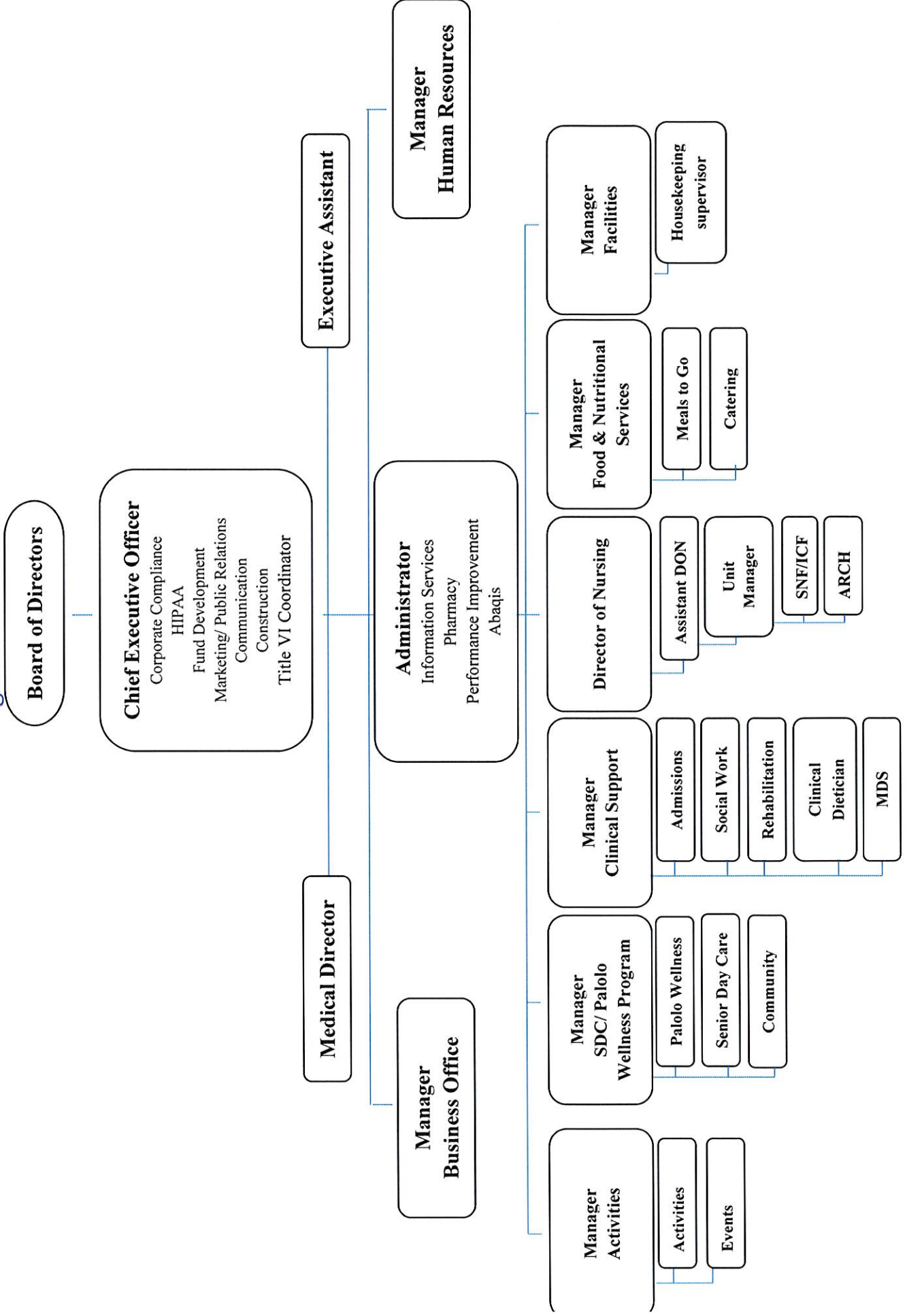
Aiza Pobre
Executive Assistant

Reviewed by,



Dr. Patricia Blanchette
Secretary

Organizational Chart



APPENDIX:

Four-Factor Analysis

REFERENCE: Federal Transit Administration CIRCULAR 4702.1B

FTA C 4702.1B

Chap. III-7

In order to ensure meaningful access to programs and activities, recipients shall use the information obtained in the Four Factor Analysis to determine the specific language services that are appropriate to provide. A careful analysis can help a recipient determine if it communicates effectively with LEP persons and will inform language access planning. The Four Factor Analysis is an individualized assessment that balances the following four factors:

Factor 1: Determining the Number and Proportion of LEP Persons Served or Encountered in the Service Area.

This population will be program- specific. In addition to the number or proportion of LEP persons served, the recipient's analysis should, at a minimum, identify:

- a) How LEP persons interact with the recipient's agency;
- b) Identification of affected LEP communities, and assess the number or proportion of LEP persons from each language group to determine the appropriate language services for each language group;
- c) The literacy skills of LEP populations in their native languages, in order to determine whether translation of documents will be an effective practice; and
- d) Whether LEP persons are underserved by the recipient due to language barriers.

Factor 2: Determine the Frequency with Which LEP Individuals Come into Contact with NRCS Programs, Activities, and Services.

Recipients should survey key program areas and assess major points of contact with the public, such as:

- a) Use of bus and rail service;
- b) Purchase of passes and tickets through vending machines, outlets, websites, and over the phone;
- c) Participation in public meetings;
- d) Customer service interactions;

- e) Ridership surveys; and
- f) Operator surveys.

Factor 3: Determine the Importance to LEP Persons of Your Program Activities and Services.

Generally speaking, the more important the program, the more frequent the contact and the likelihood that language services will be needed. The provision of public transportation is a vital service, especially for people without access to personal vehicles. 5310 regional planning activities will impact every person in a region. Development of a coordinated plan to meet the specific transportation needs of seniors and people with disabilities will often also meet the needs of LEP persons. A person who is LEP may have a disability that prevents the person from using fixed route service, thus making the person eligible for ADA complementary paratransit. Transit providers, States, and 5310s must assess their programs, activities and services to ensure they are providing meaningful access to LEP persons. Facilitated meetings with LEP persons are one method to inform the recipient on what the local LEP population considers to be an essential service, as well as the most effective means to provide language assistance.

Factor 4: Determine the Resource Available to the Recipient and Costs.

Resource and cost issues can often be reduced by technological advances, reasonable business practices, and the sharing of language assistance materials and services among and between recipients, advocacy groups, LEP populations and Federal agencies. Large entities and those entities serving a significant number of LEP persons should ensure that their resource limitations are well substantiated before using this factor as a reason to limit language assistance.

Developing a Language Assistance Plan.

After completing the Four Factor Analysis, the recipient shall use the results of the analyses to determine which language assistance services are appropriate. Additionally, the recipient shall develop an assistance plan to address the identified needs of the LEP population(s) it serves. USDOT's LEP Guidance recognizes that certain recipients, such as those serving very few LEP persons or those with very limited resources, may choose not to develop a written plan. However, FTA has determined it is necessary to require its recipients to develop an assistance plan in order to ensure compliance. A recipient may formally request an exemption from this requirement if it believes it fits within the exception described.

Recipients have considerable flexibility in developing a Language Assistance Plan, or LEP Plan. An LEP Plan shall, at a minimum:

- a) Include the results of the Four Factor Analysis, including a description of the LEP population(s) served;
- b) Describe how the recipient provides language assistance services by language;

- c) Describe how the recipient provides notice to LEP persons about the availability of language assistance;
- d) Describe how the recipient monitors, evaluates and updates the language access plan; and
- e) Describe how the recipient trains employees to provide timely and reasonable language assistance to LEP populations.

FTA will solely determine, at the time the recipient submits its Title VI Program or subsequent to a complaint investigation or compliance review, whether a recipient's plan is sufficient to ensure meaningful access and thus ensure the recipient is not engaging in discrimination on the basis of national origin.

Translation of Vital Documents

After completing the Four Factor Analysis, a recipient may determine that an effective LEP plan for its community includes the translation of vital documents into the language of each frequently encountered LEP group eligible to be served and/or likely to be affected by the recipient's programs and services.

Vital written documents include, but are not limited to: 1) consent and complaint forms; 2) intake and application forms with the potential for important consequences; 3) written notices of rights; 4) notices of denials, losses, or decreases in benefits or services; and 5) notices advising LEP individuals of free language assistance services.

Examples of vital documents include an ADA complementary paratransit eligibility application, a Title VI complaint form, notice of a person's rights under Title VI, and other documents that provide access to essential services.

Failure to translate these vital documents could result in a recipient denying an eligible LEP person access to services and discrimination on the basis of national origin.

LEP POSTER



**Please point here if you need an interpreter
in this language (at no cost to you).**

[illegible]

For more information, please contact:

Office of Language Access
830 Punchbowl Street, Room 322
Honolulu, Hawaii 96813

E-mail: Ola@doh.hawaii.gov
Call: (808) 586-8730
Neighbor Islands: 1 (866) 365-5955