

Tehama County Transit Agency

Title VI Program



Adopted by The Tehama County Transit Agency Board June ---, 2017



This document was adopted by the Tehama County Transit Agency Board to comply with Title VI of the Civil Rights Act of 1964, including new provisions detailed in U.S. Department of Transportation's FTA Circular 4702.1B "Title VI Requirements and Guidelines for Federal Transit Administration Recipients".

This page intentionally left blank.



Tehama County Transit Agency Board (TCTAB) is committed to ensuring that no person is excluded from participation in, denied the benefits of, or otherwise subjected to discrimination under any of its programs, activities, or services on the basis of race, color or national origin.

If you believe you have been subjected to discrimination under Title VI, you may file a written complaint at:

*Executive Director, Tehama County Transit Agency
9380 San Benito Avenue
Gerber CA 96035*

This page intentionally left blank.

Contents

Definitions 1

Policy..... 3

List of Locations Where Title IV Notice is Posted 4

Transit Related Title VI Investigations, Complaints and Lawsuits 5

Service Standards and Policies..... 6

 Effective Practices to Fulfill the Service Standard Requirement 6

 Vehicle Headway Standards 6

 On-Time Performance Standards 6

 Service Availability Standards..... 7

 Distribution of Transit Information 7

 Vehicle Assignment Policy 7

 Transit Shelter & Amenities Policy 7

 Frequency Placement Criteria 8

 All Designated Bus Stops – Minimum Equipment..... 8

 Other Equipment at Designated Bus Stops 8

Environmental Justice Requirements 9

Minority Representation 10

 Social Services Transportation Advisory Council (SSTAC) 10

Description of Subrecipient Monitoring and Schedule of Subrecipient Title Vi Program Submissions..... 11

Equity Analysis 12

Limited English Proficiency Plan 13

 Introduction..... 13

 Meaningful Access and “Safe Harbor” Provision 14

 Summary of Tehama County Four-Factor Analysis 15

Language Assistance Plan..... 17

 Identifying LEP Populations and Needs..... 17

 Serving LEP Populations 17

 Outreach Techniques 17

 Updating the Language Assistance Plan 18

 Staff Training 18

Public Participation Plan..... 20

Purpose 20

Public Participation Process 20

 Approach to Public Participation 20

 Outreach Requirements and Activities 21

Strategies to Engage Minority and LEP Populations in Public Participation Process 21

 Summary of Outreach Efforts..... 22

Appendix A

Title VI Notice to the Public (English)A-1

Title VI Notice to the Public (Spanish)A-2

Appendix B

 Title VI Complaint ProceduresB-1

 Title VI Complaint FormB-2

 Title VI Complaint Procedures (Spanish).....B-4

 Title VI Compliant Form (Spanish).....B-5

Appendix C

 TRAX Riders Guide

Definitions

Adverse Effect means having a harmful or undesired effect.

Discrimination refers to any act 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 perpetuates the effects of prior discrimination based on race, color, or national origin.

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

Low-Income Population means any readily identifiable groups of low-income individuals who live in geographic proximity, and if circumstances warrant, geographically dispersed transient persons (such as migrant workers or Native Americans) who will be similarly affected by a proposed DOT program, policy, or activity.

Minority Individuals

1. American Indian and Alaska Native, which refers to people having origins in any of the original peoples of North and South America (including Central America), and who maintain tribal affiliation or community attachment.
2. Asian, which refers to people having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent.
3. Black or African American, which refers to people having origins in any of the Black racial groups of Africa.
4. Hispanic or Latino, which includes people of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race.
5. Native Hawaiian and other Pacific Islanders, which refers to people having origins in any of the original people of Hawaii, Guam, Samoa, or other Pacific Islands.

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

Race means a group of people united or classified together on the basis of common history, nationality, or geographic distribution.

Recipient means one that has received or is receiving Federal financial assistance. The term includes sub-recipients of a recipient and sub-recipients in FTA State administered programs.

Retaliation is any adverse action taken against another individual because of his/her participation in the complaint, investigation, or hearing relating to this policy or the provision of federal or state law.

Vital Documents are documents that convey information that critically affects the ability of the customer to make informed decisions about his/her participation in the program (e.g., public notices, consent forms, complaint forms, eligibility rules, notices pertaining to the reduction, denial or termination of services or benefits, right to appeal, and notices informing customers of the availability of free language assistance).

Policy

- P1 Tehama County Transit Agency Board (TCTAB) is committed to ensuring that no person is excluded from participation in, denied the benefits of, or otherwise subjected to discrimination under any of its programs, activities, or services on the basis of race, color or national origin. All persons, regardless of their citizenship, are covered under this regulation. In addition, TCTAB prohibits discrimination on the basis of race, color or national origin in its employment and business opportunities.
- P2 TCTAB will not condone retaliation against an individual for his/her involvement in asserting his/her rights pursuant to Title VI or because he/she filed a complaint or participated in an investigation under Title VI, and /or this regulation.
- P3 As a Federal Transit Administration (FTA) fund recipient, TCTAB will ensure that its programs, policies and activities comply with the Department of Transportation (DOT) Title VI Regulations of the Civil Rights Act of 1964.
- P4 TCTAB will submit its Title VI Program to the FTA's regional civil rights officer once every three (3) years to ensure compliance with Title VI Requirements.
- P5 TCTAB will maintain a list of any Title VI investigations, complaints, or lawsuits filed which allege TCTAB discriminated against a person or group on the basis of race, color, or national origin. This list will include:
- a) The date the investigation, complaint, or lawsuit was filed;
 - b) A summary of the allegation(s);
 - c) The status of the investigation, complaint, or lawsuit; and
 - d) Any actions or corrective actions taken by TCTAB in response to the investigation, complaint or lawsuit.
- P6 TCTAB will ensure that the level and quality of its transportation service is provided without regard to race, color or national origin.
- P7 TCTAB will promote the full and fair participation of all affected populations in the transportation decision-making process.
- P8 TCTAB will make good faith efforts to achieve environmental justice as part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, activities, and services on minority populations and low-income populations within TCTAB's service area as provided herein.

- P9 TCTAB will ensure that Limited English Proficient (LEP) individuals have access to TCTAB's programs, activities, and services.
- P10 TCTAB will seek out and consider the viewpoints of minority, low-income and Limited English Proficient (LEP) populations in the course of conducting public outreach and involvement activities. TCTAB's public participation strategy will offer early and continuous opportunities for the public to be involved in the identification of social, economic and environmental impacts of proposed transportation decisions.
- P11 TCTAB will ensure that individuals have access to its programs, activities and services by developing and carrying out the language plan herein. TCTAB will continually assess the language assistance needs of the population to be served.
- P12 TCTAB will use the following four (4) factors to determine what measures must be undertaken to provide reasonable and meaningful access to LEP individuals:
- a) Languages likely to be encountered and the number or proportion of LEP persons in the eligible service population likely to be affected by the program, activity, or service.
 - b) Frequency with which LEP individuals come into contact with TCTAB programs, activities, and services.
 - c) Importance of the program, activity, or service provided by TCTAB to LEP individual's lives.
 - d) Resources needed to provide effective language assistance and costs.

List of Locations Where Title IV Notice is Posted

Tehama County Transit Agency's Title VI notice to the public is currently posted at the following locations:

Location Name	Address	City/Community
Public Works Office	9380 San Benito Avenue	Gerber, CA
Historic County Courthouse	633 Washington Street	Red Bluff, CA
Paratransit Services, Inc.	1509 Schwab Street	Red Bluff, CA
Red Bluff Bus & Ride	Rio Street & Walnut Street	Red Bluff, CA
Corning Transportation Center	3rd Street & Solano Street	Corning, CA

The Title VI notice and program information is also provided on the transit website at: www.taketra.com.

Such notices may also be posted or announced with local stakeholders, community centers, affected route and major transfer points. New locations may be added as needed.

Transit Related Title VI Investigations, Complaints and Lawsuits

There are No Past or Current Title VI Investigations, Complaints, or Lawsuits Involving the Tehama County Transit Agency Board, or TRAX.

Type of Process	Date	Summary (Including Basis of Complaint)	Action(s) Taken
Investigations	n/a	n/a	n/a
Lawsuits	n/a	n/a	n/a
Complaints	n/a	n/a	n/a

Service Standards and Policies

Effective Practices to Fulfill the Service Standard Requirement

Vehicle Load Standards for TRAX Fixed Route Service and ParaTRAX (Demand Response service)

Average Passenger Capacities				
Vehicle Type	Seated	Standing	Total	Max Load Factor
Glaval Transit Bus (TRAX)	19	9	28	1.47
Ford Cutaway (TRAX)	15	7	22	1.47
Ford Cutaway (ParaTRAX)	11	5	16	1.45
Chevy Minivan (ParaTRAX)	5	-	5	1

Vehicle Headway Standards

TRAX city routes alternate on one hour headways. Regional route headways are also one hour and express routes operate on two hour headways.

Headways do not apply to the ParaTRAX service as it is a demand response system for seniors aged 65 and over and persons with disabilities.

On-Time Performance Standards

Tehama County Transit “on time” performance standard prohibits vehicles from running early (no departures from any timed stops are allowed on the current schedule). Tehama County Transit strives to complete all routes “on time” (departing a published time-point no more than ten (10) minutes later than published schedule).

In the event that a TRAX route operates more than 15 minutes behind schedule, Contractor shall take all available steps to restore on-time performance. Contractor shall establish procedures, subject to County Transit Staff review and approval, to restore on-time performance.

ParaTRAX provides curb to curb service in Red Bluff only. Passengers are required to board the vehicle within three minutes of arrival. Passengers are required to schedule reservations and the vehicle will arrive within a 15-minute window before or after the scheduled time.

Service Availability Standards

Tehama County operates a rural transit system. TRAX, the regional fixed route system, provides public transportation service to the following communities in Tehama County: City of Corning, City of Red Bluff, City of Tehama, Dairyville, El Camino, Gerber, Las Flores, Los Molinos, Los Robles, Proberta and Richfield.

It is the goal to provide transit service to residential areas, major medical, shopping, government, employment centers, and activity centers that can support those route services. The regional fixed route service is designed to provide access to approximately 70 percent of the County's population.

ParaTRAX, the demand response service operates in Red Bluff which is the County seat and has a population of just over 14,000. County residents who live outside of Red Bluff may ride TRAX to connect with ParaTRAX at the Red Bluff Bus & Ride or at other bus stops.

Distribution of Transit Information

Tehama County strives to distribute hard copies of the Riders Guide to the greatest extent possible. Riders Guides are made available at the front counters of the City of Corning and Red Bluff. In addition, TRAX is a member of the Tehama County – Red Bluff Chamber of Commerce, Corning District Chamber of Commerce and Los Molinos Chamber of Commerce as such Riders Guides are displayed by local businesses in a plastic stand provide by TRAX and refills are provided upon request. In addition, most county departments also display and distribute transit information. TRAX coordinates and provides information to numerous Community Based Organizations including but not limited to: churches, apartment complexes, food banks, senior centers and the Salvation Army.

Vehicle Assignment Policy

Bus assignments take into account the operating characteristics of buses of varying capacities, features and lengths. These in turn take into account the operating characteristics of the routes. All existing vehicles are able to navigate turns. On lower ridership routes, cutaways may be used instead of buses.

Transit Shelter & Amenities Policy

The Tehama County Transit Agency Board adopted Bus Stop Standards, Policies and Procedures on February 10, 2004. All bus shelters are equipped with a trash and recycle receptacle. Installation of transit facility components such as, signs, benches, bike racks, trash receptacles, shelters, bus turn outs and other related facilities shall be coordinated with the proper governing body. The following information describes the installation of shelters and amenities.

Frequency Placement Criteria

Transit industry and traffic engineering standards practice is to place bus stop signs at intervals of 660 to 880 feet, or about every two to three blocks, excluding undeveloped areas (per ITE).

Bus stops shall be identified with a bi-directional sign and shall be placed at minimum intervals of 700 to 900 feet along each route in the incorporated cities and in densely populated areas of the county, excluding undeveloped areas.

In developed areas where it is not practical to place bus stop signs at above intervals due to auto-oriented development patterns, bus stops shall be placed in close proximity to subdivisions access points and within one block of activity centers such as shopping centers, schools, health care facilities, social service offices, apartment complexes, and mobile home parks.

All Designated Bus Stops – Minimum Equipment

The minimum requirement for a bus stop shall be:

- A bidirectional sign with a pictograph of a transit bus.
- A pole or an existing surface suitable for mounting a sign.
- A flat safe boarding area.
- Within the communities, or areas with parking conflicts, a red curb or a No parking sign.

Other Equipment at Designated Bus Stops

A bench or other seating will be included at a bus stop if the site can accommodate a bench, and if the location meets one or more of the following criteria.

- The bus stop boarding activity is at least five passengers per day.
- The bus stop is adjacent to a senior citizen housing complex or activity center.
- The bus stop is accessed by disabled, students, seniors, or transit-dependent individuals.
- The bus stop is adjacent to a medical facility.
- The stop is located at a major shopping center.
- The stop serves as a transfer point between two or more TRAX routes.
- The stop is identified as needing a bench by the Tehama County Transit Board, or the local jurisdiction (e.g., City Council, Board of Supervisors).

A shelter will be considered at a bus stop that meets all of the following criteria:

- The bus stop warrants a bench.
- A bench, if installed would be exposed to the elements (rain, wind, direct sun) and there is no nearby structure that provides reasonable shelter.
- The bus stop boarding activity is at least eight passengers per day.

Environmental Justice Requirements

TCTAB shall integrate an environmental justice analysis into its National Environmental Protection Act (NEPA) documentation of construction projects. TCTAB is not required to conduct environmental justice analyses of projects where NEPA documentation is not required.

TCTAB will consider preparing an environmental assessment (EA) or environmental impact statement (EIS) to integrate into its documents the following components:

- A description of the low-income and minority population within the study area affected by the project, and a discussion of the method used to identify this population (e.g., analysis of Census data, direct observation, or a public involvement process);
- A discussion of all adverse effects of the project both during and after construction that would affect the identified minority and low-income populations;
- A discussion of all positive effects of the project that would affect the identified minority and low-income populations, such as improvements in transit service, mobility, or accessibility;
- A description of all mitigation and environmental enhancement actions incorporated into the project to address the adverse effects, including, but not limited to, any special features of the relocation program that go beyond the requirements of the Uniform Relocation Act and address adverse community effects such as separation or cohesion issues; and the replacement of the community resources destroyed by the project;
- A discussion of the remaining effects, if any, and why further mitigation is not proposed; and
- For projects that traverse predominantly minority and low-income and predominantly non-minority and non-low-income areas, a comparison of mitigation and environmental enhancement actions that affect predominantly low-income and minority areas with mitigation implemented in predominantly non-minority or non-low-income areas.

Minority Representation

Social Services Transportation Advisory Council (SSTAC)

Per section 99238 of the Transportation Development Act, each transportation planning agency shall provide for the establishment of a Social Services Transportation Advisory Council for each county, or counties operating under a joint powers agreement, which is not subject to the apportionment restriction established in Section 99232.

The Social Services Transportation Advisory Council shall consist of the following members:

- One representative of potential transit users who is 60 years of age or older.
- One representative of potential transit users who is handicapped.
- Two representatives of the local social service providers for seniors, including one representative of a social service transportation provider, if one exists.
- Two representatives of local social service providers for the handicapped, including one representative of a social service transportation provider, if one exists.
- One representative of a local social service provider for persons of limited means.
- Two representatives from the local consolidated transportation service agency, designated pursuant to subdivision (a) of Section 15975 of the Government Code, if one exists, including one representative from an operator, if one exists.
- The transportation-planning agency may appoint additional members in accordance with the procedure prescribed in subdivision (b).

Committee/ Body	African American	Native American	Asian	Caucasian	Native Hawaiian or Pacific Islander	Latino	Other Race
Tehama County Population *	.5%	2.9%	1.3%	86.4%	0.2%	23.5%	4.6%
SSTAC Members	0%	10%	0%	80%	0%	10%	0%

*Population percentages do not total 100% due to "Two or More Races" response to Census surveys and statistical margin of error in estimates.

Description of Subrecipient Monitoring and Schedule of Subrecipient Title VI Program Submissions

The Tehama County Transit Agency Board has no subrecipients. No Federal Transit Administration fund received by the Tehama County Transit Agency Board are passed to any social services agencies, non-profits, or other such organizations.

In the event Tehama County Transit Agency Board expands and begins contracting with subrecipients, staff will revisit this issue to ensure Title VI compliance.

Equity Analysis

Title 49 CFR Section 21.9(b)(3) states “in determining the site or location of facilities, a recipient or applicant may not make selections with the purpose or effect of excluding persons from, denying the benefits of, or subjecting them to discrimination under any program to which this regulation applies, on the grounds of race, color, or national origin; or with the purpose or effect of defeating or substantially impairing the accomplishment of the objectives of the Act or this part.”

Title 49 CFR Part 21, Appendix C, Section (3)(iv) provides, “The location of projects requiring land acquisition and the displacement of persons from their residences and businesses may not be determined on the basis of race, color, or national origin”. For purposes of this requirement, “facilities” does not include bus shelters, which are considered transit amenities. Nor does it cover transit stations, power substations, or other such facilities as those are evaluated during project development and the NEPA process. Facilities included in this provision include, but are not limited to:

- Operations Centers
- Maintenance Facilities
- Storage Facilities

Tehama County has not constructed or determined sites of new facilities and, therefore, has not undergone a Title VI Equity Analysis.

The County purchased the existing Transit Facility site in September 2013. This purchase transferred title from the previous owners to Tehama County.

Tehama County would, in accordance with FTA guidelines and the adopted Tehama County Title VI Program, initiate an equity analysis study if future plans consider the relocation of the transit facility.

Limited English Proficiency Plan

Introduction

This Limited English Proficiency (LEP) Plan has been prepared to address the responsibilities of Tehama County Transit Agency Board (TCTAB) as a recipient of federal financial assistance as they relate to the needs of individuals with limited English language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, Federal Transit Administration Circular 4702.1B dated October 1, 2012, which states that no person shall be subjected to discrimination on the basis of race, color or national origin.

Executive Order 13166, titled Improving Access to Services for Persons with Limited English Proficiency, indicates that differing treatment based upon a person's inability to speak, read, write or understand English is a type of national origin discrimination. It directs each federal agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discrimination does not take place. This order applies to all state and local agencies which receive federal funds.

This plan outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, staff training that may be required, and how to notify LEP persons that assistance is available. In order to prepare this plan, the Tehama County Transit Agency Board (TCTAB) undertook the U.S. Department of Transportation (U.S. DOT) Four-Factor LEP Analysis which considers the following factors:

1. Languages likely to be encountered and the number or proportion of LEP persons in the eligible service population likely to be affected by the program, activity, or service.
2. Frequency with which LEP individuals come into contact with TCTAB programs, activities, and services.
3. Importance of the program, activity, or service provided by TCTAB to LEP individual's lives.
4. Resources needed and costs to provide effective language assistance.

Limited English Proficient (LEP) Individuals and Public Participation Requirements

The Tehama County Transit Agency Board (TCTAB) will seek out and consider the viewpoints of minority, low-income and Limited English Proficient (LEP) populations in the course of conducting public outreach and involvement activities.

TCTAB's public participation strategy will offer early and continuous opportunities for the public to be involved in the identification of social, economic and environmental impacts of proposed transportation decisions.

TCTAB will ensure that individuals have access to its programs, activities and services by developing and carrying out the language plan herein. TCTAB will continually assess the language assistance needs of the population to be served.

TCTAB will use the U.S. Department of Transportation (U.S. DOT) Four-Factor LEP Analysis to determine appropriate measures to provide reasonable and meaningful access to LEP individuals.

Meaningful Access and “Safe Harbor” Provision

The Department of Transportation has adopted Department of Justice's Safe Harbor Provision, which outlines circumstances that can provide a “safe harbor” for recipients regarding translation of written materials for LEP populations. The Safe Harbor Provision stipulates that if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with the recipient's written translation obligations. Translation of non-vital documents, if needed, can be provided orally.

The Tehama County Transit Agency Board (TCTAB) adheres to the general County policy to be inclusive and allow participation in the planning process by anyone who expresses an interest. This is set forth in the Tehama County Transportation Planning Public Participation Plan (2008).

The demographic information used in this section was compiled from the American Community Survey (ACS) 5-Year Estimates (2011 – 2015).

<https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=CF>

Summary of Tehama County Four-Factor Analysis

Factor 1: Languages likely to be encountered and the number or proportion of LEP persons in the eligible service population likely to be affected by the program, activity, or service.

While the total population of Tehama County is 63,152, all data in this section will be based on the population of 59,134 people age 5 years and over, as found at: <https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=CF>

Limited English Proficiency (LEP) Population in Tehama County

Population 5 years and older	Number of LEP Individuals	Percentage of LEP Individuals	LEP Individuals who speak Spanish	PLEP Individuals who speak Indo-Euro Languages	LEP Individuals who speak Asian and Pacific Languages	LEP Individuals who speak Other Languages
59,134	4,240	7.17%	3,841	125	283	18
			6.50%	0.21%	0.48%	0.03%

Limited English Proficiency persons are those who speak English less than “very well”.

After analysis of the census data for Tehama County and using the ‘Safe Harbor Provision’ as a guide, TCTAB determined that Spanish is the only language group that exceeds the stated criteria for printed materials.

Community Areas With Significant Percentage of Spanish Speaking Individuals

Community	Total Population	Population Speaking English Less Than “Very Well”	Percentage
Corning (Zip Code 96021)	15,001	1,781	11.87
Los Molinos (Zip Code 96055)	3,747	348	9.2%
Red Bluff (Zip Code 96080)	25,693	937	3.64%

Factor 2: Frequency with which LEP individuals come in contact with the transit program.

The Tehama County Transit Agency Board (TCTAB) staff reviewed the number of occurrences that transit or TCTAB staff have, or could have had, contact with LEP persons. During the last three (3) years since developing the Title VI program, TCTAB has had no requests for interpreters and no requests for translated program documents.

Paratransit Services, contracted operator of Tehama County transit system (TRAX) reported 10 instances that translation services were requested during the three year period since implantation of the Title VI program. There is potential to encounter LEP individuals at the regional transit facility in Red Bluff, as transit information is distributed, rides are dispatched, transit passes are sold, and public notices are posted.

While 7.17% of Tehama County's population speaks English "less than very well", this is a comparatively small percentage of the overall population. TCTAB has had very little contact with LEP persons where language assistance was requested from an LEP group or individual.

Factor 3: Importance of the program, activity, or service provided by TCTAB to LEP individual's lives.

The largest geographic concentration of LEP individuals in the Tehama County Transit Agency Board (TCTAB) service area are Spanish-speaking. Services provided by the TCTAB that are most likely to encounter LEP individuals are the fixed route system which serves the general public or the demand-response (ParaTRAX) system serving seniors and persons with disabilities.

Factor 4: Resources needed and costs to provide effective language assistance.

TCTAB assessed its available resources that could be used for providing LEP assistance, including determining the cost of a professional interpreter and translation service on an as-needed basis, which of its documents would be the most valuable to be translated if the need should arise, and taking an inventory of available organizations that TCTAB could partner with for outreach and translation efforts.

TCTAB has an agreement with other county departments for document translation services on an as needed basis.

Language Assistance Plan

Identifying LEP Populations and Needs

TCTAB will take the following steps to identify and monitor the LEP population in Tehama County:

- Periodically review updated U.S. Census Bureau and California Department of Finance Demographic Data for changes in LEP populations to identify and anticipate future LEP population needs.
- Network with local human services agencies and community based organizations providing services to LEP individuals.
- Survey bus drivers and other front-line staff annually on their experience with LEP individuals during the previous year.
- Annually examine records to see if requests for language assistance have been received in the past, either at public events and meetings or over the phone, to determine whether language assistance might be required at future events or meetings.

Serving LEP Populations

TCTAB will take the following steps to serve the LEP population in Tehama County:

- Continue to provide a bilingual Rider's Guides which, which are posted on the TRAX website at: <http://www.takestrax.com/routes.html>. The complete Riders Guide is included as Appendix C in this plan.
- Public notices relating to the annual unmet needs process and potential fare increases are provided in English and Spanish and. Upon request, staff will arrange for a translator be available at public hearings involving the TCTAB.
- Provide mobility training to LEP persons with the assistance of bilingual staff.
- When an interpreter is needed, for a language other than Spanish, in person or on the telephone, staff will utilize a professional interpreter service.
- Encourage the recruitment of bilingual staffing to provide Spanish-speaking interpretation at its administrative offices to assist with transit questions.
- Include language "Spanish a plus" on bus driver recruitment flyers and onboard recruitment posters.

Additionally, Paratransit Services, Tehama County's transit contractor, hired a bilingual Office Assistant in January 2017, which aids in translation for LEP individuals.

Outreach Techniques

When staff prepares a document, or schedules a meeting for which the target audience is expected to include LEP individuals, then documents, meeting notices, flyers, and agendas will be printed and posted in an alternative language based on the known LEP population. These notices will be posted in the following locations:

Location Name	Address	City/Community
Public Works Office	9380 San Benito Avenue	Gerber, CA
Historic County Courthouse	633 Washington Street	Red Bluff, CA
Paratransit Services, Inc.	1509 Schwab Street	Red Bluff, CA
Red Bluff Bus & Ride	Rio Street & Walnut Street	Red Bluff, CA
Corning Transportation Center	3rd Street & Solano Street	Corning, CA

Information may also be posted with local stakeholders, community centers and key bus stops. New locations may be added as may be needed. Interpreters will be available on an as-needed basis.

Updating the Language Assistance Plan

A thorough review of this Language Assistance Plan will be undertaken every three (3) years concurrent with updating and submitting the Tehama County Transit Agency Board Transit Title VI Program. At that time, the LEP population will be reassessed, to ensure all significant LEP languages are included in TCTAB’s language assistance efforts.

The following reoccurring reporting and evaluation measures will be used to update the Language Assistance Plan:

- Documenting the number of LEP persons contacted/encountered annually.
- Documenting how the needs of LEP persons have been addressed.
- Determination of the current LEP population in the service area.
- Determining whether the need for translation services has changed.
- Determining whether local language assistance programs have been effective and sufficient to meet the needs of LEP persons.
- Determine whether TCTAB’s financial resources are sufficient to fund language assistance resources needed.
- Determine whether TCTAB has fully complied with the goals of this LEP Plan.
- Determine whether complaints have been received concerning TCTAB’s failure to meet the needs of LEP individuals.
- Staying current with demographic data (U.S. Census Bureau; American Community Survey; CA Dept. of Finance Demographics).

Staff Training

Staff received the following training related to LEP populations and the Title VI program:

- Information on the TCTAB Title VI Procedures and LEP responsibilities
- Description of language assistance services offered to the public

- Documentation of language assistance requests
- Use of professional interpreter services on an as-needed basis
- How to handle a potential Title VI/LEP complaint

Public Participation Plan

Purpose

This plan provides guidelines for involving the public in Tehama County transit planning efforts to ensure that all groups are represented and their needs considered.

TCTAB is committed to ensuring it serves Tehama County fairly, consistently and in the most cost-efficient and appropriate manner given available resources. Through conversation and collaboration with riders, prospective riders, and the citizens and stakeholders of Tehama County, TCTAB will be able to assess the quality of its service, measure potential impacts to the community from TCTAB initiatives or proposed initiatives, and ensure that it is providing valuable services to the residents and visitors of Tehama County.

Public Participation Process

A public participation process will be considered for projects that may impact the general public and/or potential riders.

Approach to Public Participation

- Tehama County Transit Agency Board (TCTAB) will engage the public and appropriate agencies and organizations in the transit planning process according to the principles contained in the Tehama County Transportation Planning Agency Public Participation Plan, and in accordance with state procedures and federal law.
- TCTAB will keep the public informed of transit activities.
- TCTAB will utilize visual communication techniques (maps, charts) to effectively communicate the important transit documents. These include such documents as rider's guides and transit notices.
- TCTAB will encourage the involvement of all citizens within its jurisdiction, especially including those identified by Federal Highway Administration as traditionally underserved, in the transit and transportation process. Furthermore, TCTAB will work towards ensuring the full and fair participation in the transit decision-making process by all potentially affected communities.
- TCTAB staff will provide feedback on public comments.

Outreach Requirements and Activities

- The Transit Manager is responsible for evaluating and monitoring compliance with Title VI requirements in all aspects of the agency's public involvement process.
- Ensure that all communications and public involvement efforts comply with Title VI.
- Develop and distribute information on Title VI and agency programs to the general public.
- Provide information in languages other than English, on an as-needed basis.
- Include the Title VI Notice to the Public in all media releases, public meeting notices, and on the agency website.
- Notify affected, protected groups of public meetings regarding proposed actions, and make the hearings accessible to all residents. This includes the use of interpreters when requested, or when a strong need for their use has been identified and anticipated.
- Collect statistical information on attendees of public meetings, in order to track how well different segments of the population are represented.
- Encourage that any TCTAB created public advisory committee has representation from Title VI-identified populations.

Strategies to Engage Minority and LEP Populations in Public Participation Process

Tehama County has strategies to consider the needs of traditionally under-served populations, including those identified in Title VI of the Civil Rights Act of 1964 and those identified in the Limited English Proficient (LEP) Assistance Plan. This process allows for engagement and participation by traditionally underserved populations who may face challenges accessing employment and other services through existing transportation systems. Below are objectives in the outreach process:

- Utilize input from the county's transportation disadvantaged community, including transportation providers and citizens, to identify opportunities to improve mobility for elderly, low-income, and minority households, and mentally or physically disabled persons.
- Conduct the annual "unmet transit needs" process. This process is specifically intended to identify unmet transit needs.
- Invite public comment at regularly scheduled TCTAB meetings to discuss challenges encountered by the traditionally underserved population of Tehama County.

- Enhance access to the transportation planning process by encouraging submittal of comments electronically or verbally, consider meeting sites for public workshops or community forums that are more easily accessible to traditionally underserved communities.
- Monitor U.S. Census and Title VI information to identify these populations and document their growth patterns in the region.

Summary of Outreach Efforts

Public outreach efforts are conducted during important projects that are designed to engage disadvantaged populations. This includes the translation of public notices, and translators at public meetings to provide LEP persons with engagement opportunities.

Unmet Transit Needs Process

The Tehama County Transportation Commission conducts the annual unmet transit needs process in accordance with the Transportation Development Act. The hearing is posted in two locations and published in the local newspaper a minimum of two times. The public is also offered transportation to the hearing with advanced reservations and encouraged to submit written comments through email or provide a statement over the phone.

Outreach for Coordinated Plan Updates

Significant outreach was conducted to generate the Tehama County Coordinated Public Transit-Human Services Transportation Plan. Public outreach was conducted thru in-person and over the phone interviews and public meetings at locations spread throughout the county with stakeholders. Representations from social service agencies, transit providers, medical facilities, civic groups and others were interviewed as well as they associate with transit users on a daily basis. Conducting public outreach and targeting key groups and individuals provided the information/unment transit needs that the Coordinated Plan addresses.

This page intentionally left blank.

Appendix A

Title VI Public Notices

This page intentionally left blank.

Title VI Notice to the Public (English)

Your Rights Under Title VI of the Civil Rights Act of 1964

Title VI is a section of the Civil Rights Act of 1964 requiring that “No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.” Note that Title VI does not address gender discrimination. It only covers race, color and national origin. Other Civil Rights laws prohibit gender discrimination.

Any person who feels that he or she, individually or as a member of any class of persons, on the basis of race, color, or national origin has been excluded from or denied the benefits of, or subjected to discrimination caused by the, the Tehama County Transit Agency, or TRAX, please contact the Tehama County Title VI Administrator or the Federal Transit Administration (FTA) Office of Civil Rights. Federal and State law requires complaints to be filed within one-hundred and eighty (180) calendar days of the last alleged incident.

**Federal Transit Administration (FTA) Office of Civil Rights
Attn: Title VI Program Coordinator
East Building, 5th Floor-TCR, 1200 New Jersey Avenue SE
Washington DC 20590**

**Tehama County Transit Agency
Attention: Title VI Administrator
9380 San Benito Avenue
Gerber, CA 96035
(530) 385-1462**

**For questions or to request additional information, please contact:
Tehama County Title VI Administrator**



Title VI Notice to the Public (Spanish)

Sus derechos en virtud del Título VI De la Ley de Derechos Civiles de 1964

Título VI es una sección de la Ley de Derechos Civiles de 1964 que exige que "Ninguna persona en los Estados Unidos será, por motivos de raza, color u origen nacional, ser excluida de participar en, ser negado los beneficios de, o ser sometido a la discriminación bajo cualquier programa o actividad que reciba asistencia financiera federal ". Tenga en cuenta que el Título VI no se ocupa de la discriminación de género. Sólo cubre la raza, color y origen nacional. Otras leyes de derechos civiles prohíben la discriminación de género.

Cualquier persona que sienta que él o ella, de forma individual o como miembro de cualquier clase de personas, sobre la base de raza, color u origen nacional ha sido expulsado o se le negarán los beneficios de, o sujeto a discriminación causada por la, la Agencia de Transporte del Condado de Tehama, o TRAX, póngase en contacto con el Administrador del Condado de Tehama Título VI o la Administración Federal de Tránsito (FTA) Oficina de Derechos Civiles. La ley federal y estatal requiere que las quejas sean presentados dentro de los ciento ochenta (180) días calendario a partir de la última presunto incidente.

Administración Federal de Tránsito (FTA) Oficina de Derechos Civiles
A la atención de: Coordinador de Programa del Título VI
Edificio Este, 5^o piso-TCR, 1200 New Jersey Avenue SE
Washington DC 20590

Agencia de Transporte del Condado de Tehama
Administrador Título VI: Atención
9380 San Benito Avenida
Gerber, CA 96035
(530) 385-1462

Para preguntas o para solicitar información adicional, por favor póngase en contacto con: Administrador del Condado de Tehama Título VI



Appendix B

Title VI Complaint Procedures and Forms

This page intentionally left blank.

Title VI Complaint Procedures

Any person who believes he or she has been discriminated against on the basis of race, color, or national origin by the Tehama County Transit Agency Board (TCTAB) or TRAX may file a Title VI complaint by completing and submitting TCTAB's Title VI Complaint Form. TCTAB investigates complaints received no more than 180 days after the alleged incident. The Authority will only process complaints that are complete. The following procedures will be followed to investigate formal Title VI complaints:

Within 10 business days of receiving the complaint, the TCTAB Title VI Program Administrator will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office.

The investigation will be conducted and completed within 30 days of the receipt of the formal complaint.

If more information is needed to resolve the case, TCTAB may contact the complainant. The complainant has 10 business days from the date of the letter to send requested information to the Title VI Administrator investigator. If the investigator is not contacted by the complainant or does not receive the additional information within 10 business days, TCTAB can administratively close the case.

The complainant will be notified in writing of the cause to any planned extension to the 30-day rule.

A case can be administratively closed also if the complainant no longer wishes to pursue their case. Following the investigation, the Title VI Administrator will issue one of two letters to the complainant: 1) a closure letter or 2) a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. A letter of finding summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member, or other action will occur.

If the complainant is unsatisfied with the decision, he/she has 30 days after the date of TCTAB's closure letter or the LOF to appeal to the TCTAB Board of Directors or its designee. The complainant is entitled to review the denial, to present additional information and arguments, and to separation of functions (i.e. a decision by a person not involved with the initial decision to deny eligibility). The complainant is entitled to receive written notification of the decision of the appeal and the reasons for it.

The complainant may also file a complaint directly with the Federal Transit Administration, as follows: Title VI Program Coordinator, FTA Office of Civil Rights, East Building, 5th Floor – TCR, 1200 New Jersey Ave., S.E., Washington, D.C. 20590

Title VI Complaint Form

Section I		
1. Name:		
2. Address:		
3. Telephone Number(s):		
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
* If you answered 'Yes' to Question 6, skip to Section III.		
7. If you answered 'No' to Question 6, what is the name of the person for whom you are filing this complaint? Name:		
8. What is your relationship to this individual?		
9. Please explain why you have filed for a third party:		
10. Please confirm that you have obtained permission of the aggrieved party to file on their behalf.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Section III		
11. I believe the discrimination I experienced was based on (<i>check all that apply</i>): <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 names and contact information of any witnesses. If more space is needed, please use the back of this form.		

Title VI Complaint Form (continued)

Section IV		
6. Have you previously filed a Title VI complaint with the Tehama County Transit Agency?	[] Yes	[] No
Section V		
15. Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court? [] YES* [] NO If yes, check all that apply: [] Federal Agency _____ [] State Agency _____ [] Federal Court _____ [] Local Agency _____ [] State Court _____		
16. If you answered 'Yes' to question 15, provide information about a contact person at the agency/court where the complaint was filed.		
Name: _____		
Title: _____		
Agency: _____		
Address: _____		
Telephone: _____		
Section VI		
Name of Transit Agency complaint is against: _____		
Contact Person: _____		
Telephone: _____		

You may attach any written materials or other information that you think is relevant to your complaint. Signature and date are required below to complete this form.

Signature: _____ Date: _____

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

Tehama County Transit Agency
Attention: Title VI Administrator
9380 San Benito Avenue
Gerber, CA 96035
(530) 385-1462

Title VI Complaint Procedures (Spanish)

Cualquier persona que cree que él o ella ha sido víctima de discriminación en base a raza, color, u origen nacional por el Consejo del Condado de Tehama Transit Agency (TCTAB) o TRAX, puede presentar una queja del Título VI, completando y enviando el Formulario de Queja Título VI de TCTAB. TCTAB investiga las quejas recibidas no más de 180 días después del supuesto incidente. La Autoridad sólo procesará las denuncias que se han completado. Se seguirán los siguientes procedimientos para investigar las quejas formales Título VI:

Dentro de los 10 días hábiles de haber recibido la queja, el Administrador del Programa VI TCTAB Título lo revisará para determinar si nuestra oficina tiene jurisdicción. El demandante recibirá una carta de reconocimiento a él/ella informar si la denuncia será investigada por nuestra oficina.

La investigación se llevará a cabo y completado dentro de los 30 días siguientes a la recepción de la queja formal.

Si se necesita más información para resolver el caso, TCTAB puede comunicarse con la denunciante. El demandante tiene 10 días hábiles desde la fecha de la carta a enviar la información solicitada para el investigador Administrador Título VI. Si el investigador no está en contacto con el reclamante o no recibe la información adicional dentro de los 10 días hábiles, TCTAB puede cerrar administrativamente el caso.

El denunciante será notificado por escrito de la causa a cualquier ampliación prevista de la norma de los 30 días.

Un caso puede ser administrativamente cerrado también si el autor ya no desea seguir su caso. Tras la investigación, el Administrador Título VI emitirá una de las dos cartas al demandante: 1) una carta de cierre o 2) una carta de encontrar. Una carta cierre resume las acusaciones y afirma que no hubo una violación del Título VI y que el caso se cerrará. Una carta de encontrar resume los hechos denunciados y las entrevistas sobre el supuesto incidente, y explica si alguna acción disciplinaria, la formación adicional del miembro del personal, u otra acción ocurrirá.

Si el demandante no está satisfecho con la decisión, él/ella tiene 30 días después de la fecha de la carta de cierre de TCTAB o la carta de encontrar de apelar a la Junta TCTAB de Administración o su representante. El denunciante tiene derecho a revisar la negación, para presentar información y argumentos adicionales, y para la separación de funciones (es decir, una decisión de una persona no involucrada con la decisión inicial de negar la elegibilidad). El demandante tiene derecho a recibir una notificación por escrito de la decisión de la apelación y las razones para ello.

El demandante también puede presentar una queja directamente con la Administración Federal de Tránsito, de la siguiente manera: Coordinador de Programa del Título VI, FTA Oficina de Derechos Civiles, East Building, 5th Floor - TCR , 1200 New Jersey Ave. , SE, Washington, DC 20590

Title VI Compliant Form (Spanish)

FORMULARIO DE QUEJA Título VI

Sección I		
1. Nombre:		
2. Dirección:		
3. Teléfono		
4. Dirección de correo electrónico:		
5. ¿Hay requisitos de formato accesible?	<input type="checkbox"/> Letra Grande	<input type="checkbox"/> Cinta de audio
	<input type="checkbox"/> TDD	<input type="checkbox"/> Otro
Sección II		
6. ¿Se presenta esta queja para si mismo?	<input type="checkbox"/> Sí*	<input type="checkbox"/> NO
* Si usted contestó "sí" a #6, vaya a la Sección III.		
7. Si usted contestó "no" a #6, ¿cuál es el nombre de la persona para la cual usted está presentando esta queja? nombre:		
8. ¿Cuál es su relación con esta persona?:		
9. Por favor, explique por qué usted ha presentado para un tercero:		
10. Por favor, confirme que ha obtenido el permiso de la parte agraviada para presentar en su nombre.	<input type="checkbox"/> Sí	<input type="checkbox"/> NO
Sección III		
11. . Creo que la discriminación que experimenté fue basado en (<i>marque todo lo que corresponda</i>): <input type="checkbox"/> Raza <input type="checkbox"/> Color <input type="checkbox"/> Origen Nacional		
12. Date of alleged discrimination (mm/dd/yyyy)		
13. Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known), as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.		

Sección IV		
6. ¿Ha presentado anteriormente una queja del Título VI contra la Agencia de Transporte del Condado de Tehama?	[] SÍ	[] NO
Sección V		
15. ¿Ha presentado esta queja con otro tribunal o agencia local o federal? [] YES* [] NO En caso afirmativo, marque todo lo que corresponda: [] Agencia Federal _____ [] Agencia Estatal _____ [] Tribunal Federal _____ [] Agencia Local _____ [] Tribunal Estatal _____		
16. Si usted contestó "sí" a la #15, proporcione información de una persona de contacto en la agencia/tribunal donde se presentó la queja.		
Nombre:		
Título:		
Agencia:		
Dirección:		
Teléfono:		
Sección VI:		
Nombre de la Agencia de Tránsito contra la cual se presenta la queja:		
Persona de Contacto:		
Teléfono:		

Se puede adjuntar cualquier material escrito o cualquiera otra información que usted cree que puede ser relevante para su queja.

Para completar el formulario es necesario firmar y poner la fecha abajo:

Firma: _____ Fecha: _____

Por favor entregue este formulario en persona o enviar por correo este formulario a la dirección indicada a continuación:

Tehama County Transit Agency
9380 San Benito Avenue
Gerber, CA 96035
(530) 385-1462

Appendix C

TRAX Riders Guide

This page intentionally left blank.
