

Cambria Community Council

TITLE VI PROGRAM

Updated: November, 2017

Approved by Cambria Community Council Board of

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Cambria Community Council

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Cambria, CA 93428

(805) 927-4173

INTRODUCTION

This document was prepared by the Cambria Community Council to comply with Title VI of the Civil Rights Act of 1964, including new provisions detailed in U.S. Department of Transportation's FTA Circular 4702.1B, "Title VI Requirement and Guidelines for Federal Transit Administration Recipients."

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Cambria Community Council Community Bus Title VI Notice to the Public

Notifying the Public of Rights Under Title VI

Cambria Community Council

- Cambria Community Council operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the Cambria Community Council.
- For more information on Cambria Community Council civil rights program, and the procedures to file a complaint, contact Cambria Community Council at (805) 927-4173. You may also reach us by mail at P. O. Box 486, Cambria, CA 93428.
- A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590
- If information is needed in another language, contact (805) 927-4173.

Notificar al público de los derechos bajo el título VI
Cambria Community Council

- Cambria Community Council opera sus programas y servicios sin respecto a raza, color y origen nacional con arreglo al título VI de la Civil Ley de derechos. Cualquier persona que cree que él o ella ha sido agraviado por cualquier práctica discriminatoria ilegal bajo el título VI puede presentar una queja con Cambria Community Council
- Para obtener más información sobre el programa derechos civiles capaz de industrias y el procedimientos para presentar una queja, llame al (805) 927-4173. Para más información, llame Cambria Community Council at (805)927-4173. Un demandante puede presentar una queja directamente con el Federal Transit Administration por archivar una queja con la Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590
- Si se necesita información en otro idioma, contacte al (805) 927-4173 or P.O.Box 486, Cambria, CA 93428.

List of Locations Where Title VI Notice Is Posted

Cambria Community Council Bus notice to the public is currently posted at the following locations:

Location Name	Address	City
Cambria Veterans Hall	Main Street and Cambria Drive	Cambria
St. Paul's Episcopal Church	2700 Eaton Street	Cambria

The Title VI notice and program information is also provided on both Cambria Community Council Community buses.

Title VI Complaint Procedures

As a recipient of federal dollars, Cambria Community Council is required to comply with Title VI of the Civil Rights Act of 1964 and ensure that services and benefits are provided on a non-discriminatory basis. Cambria Community Council has in place a Title VI Complaint Procedure, which outlines the process for local disposition of Title VI complaints and is consistent with guidelines found in the Federal Transit Administration Circular 4702.1B, dated October 1, 2012.

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by the Cambria Community Council may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form. Cambria Community Council investigates complaints received no more than 180 days after the alleged incident. Cambria Community Council will only process complaints that are complete.

Within 10 business days of receiving the complaint, the Cambria Community Council 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 Cambria Community Council has 30 days to investigate the complaint. The complainant will be notified in writing of the cause to any planned extension to the 30-day rule.

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

A case can be administratively closed also if the complainant no longer wishes to pursue their case. After the investigator reviews the complaint, she/he will issue one of two letters to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. An LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member, or other action will occur. If the complainant wishes to appeal the decision, she/he has 10 business days after the date of the letter or the LOF to do so.

A person may also file a complaint directly with the Federal Transit Administration, at FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.

Cambria Community Council Title VI Complaint Form

COMPLAINT FORM

Section I: Please write legibly		
1. Name:		
2. Address:		
3. Telephone:	3.a. Secondary Phone (Optional):	
4. Email Address:		
5. Accessible Format Requirements?	<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?	YES*	NO
*If you answered "yes" to #6, go to Section III.		
7. If you answered "no" to #6, what is the name of the person for whom you are filing this complaint? Name:		
8. What is your relationship with this individual:		
9. Please explain why you have filed for a third party:		
10. Please confirm that you have obtained permission of the aggrieved party to file on their behalf.	YES	NO
Section III:		
11. I believe the discrimination I experienced was based on (check all that apply):		
<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 attach additional sheets of paper.		

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COMPLAINT FORM

Section IV:		
14. Have you previously filed a Title VI complaint with Cambria Community Council?	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? <input type="checkbox"/> YES* <input type="checkbox"/> NO If yes, check all that apply: <input type="checkbox"/> Federal Agency _____ <input type="checkbox"/> State Agency _____ <input type="checkbox"/> Federal Court _____ <input type="checkbox"/> Local Agency _____ <input type="checkbox"/> State Court _____		
16. If you answered "yes" to #15, provide information about a contact person at the agency/court where the complaint was filed.		
Name:		
Title:		
Agency:		
Address:		
Telephone:		Email:
Section VI:		
Name of Transit Agency complaint is against:		
Contact Person:		
Telephone:		

You may attach any written materials or other information that you think is relevant to your complaint.

Signature and date are required below to complete form:

Signature _____ Date _____

Please submit this form in person or mail this form to the address below:
 Cambria Community Council, Title VI Coordinator Warren Gay
 P O Box 486, Cambria, CA 93428

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

Cambria Community Council has not been involved in any transportation-related Title VI investigations, lawsuits or complaints.

Cambria Community Council List of Investigations, Lawsuits and Complaints

Type of Process	Date	Summary (including basis of complaint)	Status	Action(s) Taken
Investigations				
1. None				
2.				
Lawsuits				
1. None				
2.				
Complaints				
1. None				
2.				

Public Participation Plan

About Cambria Community Council and the Community Bus

The Cambria Community Council transportation system, known locally as “The Cambria Community Bus”, provides local door to door service for seniors (persons over 60) and disabled persons within the Cambria-San Simeon area. Multiple stops are not only allowed but encouraged. **All rides are free.** A dispatcher answers the dispatch phone between 9am and 11am Monday through Friday. Persons needing a ride must call in to the dispatcher at least one day prior to the scheduled ride. Each bus is equipped with a cell phone to assist in schedule adherence and process any additions or deletions to the daily schedule. Riders are encouraged to use the cell phone in order to obtain better, more on time service.

The service operates one bus locally weekdays between 8am and 4:30 pm. A second bus makes a day trip to San Luis Obispo twice a month on Tuesdays, medical appointments having priority seating. This second bus also makes a day trip to Paso Robles and Templeton the third Tuesday of each month. Both buses are ADA equipped.

Drivers will provide assistance if necessary for riders entering and exiting the bus as well as transporting packages and groceries into the rider’s home. All drivers are volunteers from the community and again, **all rides are free.**

Purposes of this Plan

Public participation is the process through which stakeholders can partake directly in agency decision-making, and express their concerns, desires, and values. It is the mission of this agency to "improve the lives of seniors and people with disabilities by creating opportunities to maximize their independence." At every opportunity through prescribed methods the agency will solicit input from stakeholders in order to best support persons served without creating disproportionately high and adverse human health or environmental effects on minority and/or low-income populations.

Summary of Outreach Efforts

The following is a summary of outreach efforts conducted by Cambria Community Council as they relate to Title VI requirements under the Public Participation Plan. Our bus service is also announced in the local paper. The service is recommended as needed by the local doctor's offices. Anyone eligible for the service is able to participate.

Board Meetings Open to the Public

Cambria Community Council quarterly Board meetings are open to the public and announced in the local newspaper.

Cambria Chamber of Commerce

Cambria Community Council is a member of the Cambria Chamber of Commerce which helps visitors on the central coast.

Local Grant Awards

The Cambria Community Council awards grants yearly to local rural nonprofits based on need. These groups include the local Boy Scouts, Girl Scouts, Senior Nutrition, and other youth and senior organizations

Cambria Community Council Website

The Cambria Community Council website is <https://www.cambriacommunitycouncil.org>. Information about the Title VI Program appears on the site.

Community Events

The bus is also used for local events such as Piedras Blancas Lighthouse tour for seniors, Coastal Discovery Center shuttle bus, North Coast Ocean Rescue shuttle bus, Santa Rosa Catholic Church shuttle bus. These events are often outside normal bus hours and served by volunteer drivers.

The agency also does outreach and public relations throughout the year regarding the bus service and community grants.

Language Assistance Plan

Overview

The first section in this document describes the purpose of the Language Assistance Plan (LAP). The second section in this document provides the four-factor Limited English Proficient (LEP) analysis (as outlined by the Department of Transportation (DOT) used to identify LEP needs and assistance measures. The four-factor LEP analysis includes:

- **Factor 1:** The number or proportion of LEP persons in the service area who may be served or are likely to encounter the Life Skills Learning Center program, activity or service.
- **Factor 2:** The frequency with which LEP persons come in contact with the Life Skills Learning Center program, activity or service.
- **Factor 3:** The nature and importance of programs, activities or services provided by Life Skills Learning Center to the LEP population.
- **Factor 4:** The resources available to Cambria Community Council and overall cost to provide LEP assistance.

The third and final section discusses the implementation of the Language Assistance Plan, which includes methodologies for identifying LEP individuals, providing services, establishing policies, monitoring the LAP, and recommendations for future LAP implementations.

Purpose of the Language Assistance Plan

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance. One critical concern addressed by Title VI is the language barrier that Limited English Proficiency (LEP) persons face with respect to accessing information about and using transit service. Transit operators must ensure that this group has adequate access to the agency's programs and activities, including public participation opportunities.

Executive Order 13166, titled "Improving Access to Services for Persons with Limited English Proficiency," forbids funding recipients from "restricting an individual in any way in the enjoyment of any advantage or privilege enjoyed by others receiving any service, financial aid, or other benefit under the program," or from "utilize[ing] criteria or methods of administration which have the effect of subjecting individuals to discrimination because of their race, color, or national origin, or have the effect of defeating or substantially impairing accomplishment of the objectives of the program as respects to individuals of a particular race, color, or national origin."

FTA Circular 4702.1B was developed by the Federal Transit Administration (FTA) and details the administrative and reporting requirements for recipients of FTA financial assistance to comply with Title VI and related executive orders including on LEP.

The United States Department of Transportation (DOT) published guidance that directed its recipients to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for LEP customers. Cambria Community Council language assistance plan (LAP) includes a four factor analysis and implementation plan that complies with the requirements of DOT LEP guidance.

Four Factor Analyses Cambria Community Council

Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by Cambria Community Council.

The Cambria Community Council holds a unique position in regard to meeting the Title VI requirements. As a sub-recipient of FTA 5310 Grant funding, the agency's focus is primarily to transport seniors and adults with disabilities where current public transit options are insufficient or do not exist. Eligible program participants or "riders" must meet limited criteria to participate in the program. As such, the Cambria Community Council does not offer transportation to the general public other than in situations involving a coordinated plan with other entities. Therefore, an analysis of public demographic data in San Luis Obispo County does not represent actual populations served by this program is not a reflection of the program recipients.

There is one source of data that most accurately represent LEP persons likely to be served by the program, and that is the American Community Survey 2011-2015 5 year estimates, Table B16004. This referenced table shows a Cambria population of 2608 persons 65 years of age and older. Of that population, only 2.4% (63 persons) have a "Not well" English proficiency designation. Riders of the Cambria Community Council bus are asked for their name, address and place they will be taken to. They are also asked if they meet the criteria of the bus; which is over 60 years of age or disabled. No other information is asked for or given in this process, and any language needs are assessed at this time. Less than 1% of the current bus riding population is Hispanic, and no language issues have been reported by the dispatcher or the bus drivers.

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

As indicated above, historically, regular contact with LEP consumers has not yet occurred in this program. In a similar survey in the Cambria Community Council program, dispatch staff revealed that they **rarely** receive phone calls from LEP persons and have encountered no issues in serving non-English speaking senior or disabled recipients. The continuation of the program is contingent upon the continued ability to have resources to provide the bus service, and during our annual local fund drive, opportunities arise for the public to provide feedback and information on the services and staffing with the bus.

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

The primary purpose of the Cambria Community Council Community Bus program is to provide transportation to seniors and the disabled. In this rural area, the transportation allows seniors and the disabled to access services that they need in order to remain in their homes and in the community. Currently, Cambria Community Council Bus serves approximately 9300 riders per year. This number varies by week and month and fluctuates as individual's health and home situations change. Many consumers become regular riders and may remain in the program as long as their needs can continue to be met.

While, the Cambria Community Council Bus program is small, it does create opportunities for individuals in this rural environment that can enhance the quality of life for seniors and adults with disabilities.

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

The Cambria Community Council Bus operating budget does not have a specific line item for providing language access and outreach. Outreach expenses are not considered essential, and the majority of the costs for the program are bus maintenance, tires, fuel and insurance. Any translation of documents is done by volunteers, and has not been quantified. Significant outreach budget allocations for the entire agency this fiscal year include but are not limited to:

- Ads in local publications and email blasts: \$500

The outreach budget for the Cambria Community Council, which provides services through the FTA 5310 grant, is a small fraction of the agency's budget. The total annual expenditures for the Cambria Community Council Bus are approximately \$40,000. Specific outreach to LEP populations has not been conducted as a reasonably significant number of LEP persons have not been served by this program, as indicated in Factor 1.

SUMMARY

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

- No language issues have been encountered by riders of the Cambria Community Council Bus.
- No consumers were underserved or exited the program due to language barriers.
- Surveyed staff reported no issues receiving LEP phone calls. .
- Cambria Community Council does not have an LEP specific budget line.
- Cambria Community Council spends less than \$500 per year on all outreach efforts.

Cambria Community Council Language Assistance Implementation Plan for the Community Bus

Methodologies

Identifying LEP Individuals

As evidenced by the Four Factor Analysis, LEP individuals rarely participate in the Cambria Community Council Community Bus program. The predominant minority language in the region is Spanish. The consumers that are primarily served by the Cambria Community Council Community Bus program are elderly and have disabilities that affect their ability to drive, and their ability to communicate is generally not a factor in their ridership.

Providing Services

While the agency does not currently have an on-going need for professional translation services, dispatcher and driver staff has access to a translator to provide translation services as needed through the bus administrator. Documents that are offered in Spanish include:

- Title VI Notice to the Public
- Title VI Complaint Form
- Title VI Complaint Procedures

Other documents can be translated to Spanish orally as appropriate.

Communicating Availability of Language Assistance

When individuals contact the dispatcher to set up transportation services, if translation is needed, it is provided at that time. All efforts are made to accommodate the needs of the individual. The new agency website will also contain summary information in Spanish with instructions on how to obtain more information.

Monitoring

Cambria Community Council maintains an Agency Accessibility Plan which is designed to minimize barriers that are created by architectural factors, environmental factors, attitudinal factors, financial and employment barriers and communication barriers such as language. This plan is reviewed and updated annually.

Cambria Community Council Annual Report is analyzed for trends and patterns that indicate a need for additional services. This report includes ethnicity and can be used as a guide to determine the need for additional translation services.

Satisfaction Surveys for the program offer an opportunity for consumers to provide input or suggest additional services. To date, translation services have not been requested. The Title VI Plan will also be evaluated and updated every three years.

Employee Training

Cambria Community Council conducts training for volunteer bus drivers and staff that includes Customer Service and Language Assistance training.

Safe Harbor Provision

The Federal Transit Authority Circular 4702.1B states:

"DOT has adopted DOJ's Safe Harbor Provision, which outlines circumstances that can provide a "safe harbor" for recipients regarding translation of written materials for LEP populations. The Safe Harbor Provision stipulates that, if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with the recipient's written translation obligations. Translation of non-vital documents, if needed, can be provided orally. If there are fewer than 50 persons in a language group that reaches the five percent (5%) trigger, the recipient is not required to translate vital written materials but should provide written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost.

These safe harbor provisions apply to the translation of written documents only. They do not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable. A recipient may determine, based on the Four Factor Analysis, that even though a language group meets the threshold specified by the Safe Harbor Provision, written translation may not be an effective means to provide language assistance measures. For example, a recipient may determine that a large number of persons in that language group have low literacy skills in their native language and therefore require oral interpretation. In such cases, background documentation regarding the determination shall be provided to FTA in the Title VI Program."

As previously stated, the Cambria Community Council Bus program serves individuals who are over sixty years of age or disabled. As such, the majority of consumers have good communication skills and are able to make their needs known to the volunteer drivers and the dispatcher of the bus.

Membership of Non-Elected Committees and Councils

Cambria Community Council does not have a non-elected transit related advisory council at this time.

Title VI Equity Analysis

Cambria Community Council does not have any transit related facilities. Our buses are parked in a lot owned by the State of California Cal Fire Department. We do not have an office or facility, our bus dispatcher works from her home and the drivers are all volunteers. We meet quarterly at a local community meeting room to conduct business connected with the bus. Our bus administrator, Warren Gay, also works from his home to manage the administration of the transportation program and the maintenance of the buses and the schedule of the drivers.

Board of Directors Approval of Cambria Community Council Title VI Program

A RESOLUTION OF THE CAMBRIA COMMUNITY COUNCIL BOARD OF DIRECTORS AUTHORIZING THE TITLE VI COMPLIANCE PLAN FOR THE AGENCY.

WHEREAS, the Cambria Community Council desires to comply with Title VI of the Civil Rights Act of 1964, including new provisions detailed in U.S. Department of Transportation's FTA Circular 4702.1B, "Title VI Requirement and Guidelines for Federal Transit Administration Recipients,"

WHEREAS, the Board of Directors wishes to authorize approval of the compliance plan developed by staff to comply with necessary provisions of the Civil Rights Act,

NOW, THEREFORE BE IT RESOLVED, by the Board of Directors of Cambria Community Council as follows:

1. The Bus Administrator is authorized to implement the components of the plan in order to meet Federal requirements.
2. The Bus Administrator is authorized to implement policies that may be necessary to comply with subsequent revisions or interpretations to the Civil Rights Act.

PASSED AND ADOPTED by the Board of Directors of Cambria Community Council, P.O. Box 486, Cambria, California, on this 27th Day of November, 2017.

(signed on 11/28/2017)
Suzanne Kennedy, Secretary

