

A partnership of the cities of Claremont, La Verne, Pomona and San Dimas

2120 Foothill Boulevard ■ Suite 116 ■ La Verne California 91750

phone 909-596-7664 fax 909-596-7399

June 10, 2020

AGENDA ITEM #6

MEMORANDUM

To:

Pomona Valley Transportation Authority

From:

Erika Cardenas, Mobility Manager

Subject:

Approval of Updated Title VI Program

Recommended Action: Adopt New Resolution No. 20-02 authorizing the mandatory triennial update of the Title VI Compliance Plan for Pomona Valley Transportation Authority.

Background

As a recipient of federal and local funds PVTA must comply with civil rights Title VI requirements. PVTA Title VI policies are required to be updated every (3) years. With the oversight of METRO PVTA will submit the updates and signed Board resolution to metro as proof that all recommended updates and changes are approved. Attached is the updated Title VI program for PVTA below is a list of the following updates.

- 1. Updated the number of LEP individuals with current Census Bureau data. PVTA will continue to translate vital documents to Spanish and Chinese.
- 2. Update Title VI training material

Board of Directors Approval of Pomona Valley Transportation

POMONA VALLEY TRANSPORTATION AUTHORITY BOARD OF DIRECTORS AUTHORIZING THE TITLE VI COMPLIANCE PLAN FOR THE AGENCY.

Resolution No. 20-02

WHEREAS, Pomona Valley Transportation Authority 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,"

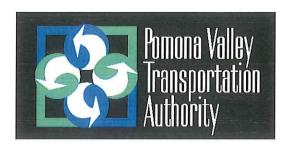
WHEREAS, the Board of Directors wishes to authorize approval of the compliance plan developed by staff to comply with necessary provisions of the Civil Rights Act,

NOW, THEREFORE BE IT RESOLVED, by the Board of Directors of Pomona Valley Transportation Authority as follows:

- 1. The Administrator is authorized to implement the components of the plan in order to meet Federal requirements.
- 2. The 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 Pomona Valley Transportation Authority, State of California, on this 10th day of June, 2020.

Chair of the Board



TITLE VI PROGRAM

Updated: May 2020
Approved by Pomona Valley Transportation Authority
Board of Directors:
June 10, 2020

George Sparks, PVTA Administrator
Pomona Valley Transportation Authority
2120 Foothill Blvd. #116
La Verne, CA
909-596-7664
WWW.PVTRANS.ORG

INTRODUCTION

This document was prepared by *Pomona Valley Transportation Authority* 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

Table of Contents

Title VI Notices to the Public	Pg. 5
List of Locations Where Title VI Notice Is Posted	Pg. 8
Title VI Complaint Procedures & Forms	Pg. 9
List of Transit-Related Title VI Investigations, Complaints, and Lawsuits	Pg. 21
Public Participation Plan	Pg. 22
Summary of Outreach Efforts Made Over the Last Three Years	Pg. 27
Language Assistance Plan	Pg. 29
Safe Harbor Provision	Pg. 33
Table Depicting the Membership of Non-Elected Committees And Councils	Pg. 47
Title VI Equity Analysis	Pg. 48
Board of Directors Approval of Title VI Program	Pg. 49

Introduction

This document was prepared by Pomona Valley Transportation Authority and approved by its Board of Directors to comply with Title VI of the Civil Rights Act of 1964, including new provisions detailed in U. S. Department of Transportation's FTA Circular 4702.1B "Title VI Requirements and Guidelines for Federal Transit Administration Recipients."

Overview of PVTA's Service Area and Services

The Pomona Valley is located approximately 30 miles east of Los Angeles. Pomona Valley Transportation Authority (PVTA) is a Joint Powers Authority serving the cities of Claremont, La Verne, Pomona and San Dimas with a service population of 253,000.

PVTA is the community transit provider for the Pomona Valley. Its primary service, Get About, is an elderly and disabled demand response service. Get About operates throughout the four cities. Get About operates 6:00 a.m. to 7:30 p.m. weekdays, 8:30 a.m. to 5:00 p.m. Saturdays and 7:30 a.m. to 5:00 p.m. Sundays. Get About carries approximately 130,000 passengers annually.

PVTA also operates three other demand response services on behalf of member cities, the Claremont Dial-a-Ride, Pomona Group Service and San Dimas Dial-a-Cab. In FY 2019 PVTA operated approximated 633,000 miles and carried 170,000 passengers.

PVTA provides all its transit services via private contractors. PVTA has two service contracts. One for dedicated vehicle services and the other for demand response services (cab). PVTA has a fleet of 26 cut-a-way vehicles and 10 accessible minivans. PVTA offices are located at 2120 Foothill Blvd, Ste. 116, La Verne, CA 91750.

Pomona Valley Transportation Authority Title VI Notice to the Public

Notifying the Public of Rights Under Title VI

Pomona Valley Transportation Authority

- Pomona Valley Transportation Authority 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 Pomona Valley Transportation Authority.
- For more information on Pomona Valley Transportation Authority civil rights program, and the procedures to file a complaint contact 909-596-7664, or visit our administrative office at 2120 Foothill Blvd. #116, La Verne, CA

For more information, visit www.pvtrans.org

- A complainant may file a complaint directly with the Federal Transit
 Administration by filing a complaint with the Office of Civil Rights,
 Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR,1200 New Jersey Ave., SE, Washington, DC 20590
- If information is needed in another language, contact 909-596-7664
- Si la información es necesaria en otro idioma hable al 909-596-7664
- 如果信息是需要另一种语言接触909-596-7664
- Nếu thông tin là cần thiết trong môt ngôn ngữ khác tiếp xúc 909-596-7664

Pomona Valley Transportation Authority Title VI Notice to the Public (Spanish)

Notificar al público de los derechos bajo el título VI Pomona Valley Transportation Authority

- Pomona Valley Transportation Authority opera sus programas y servicios sin respecto araza, 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 porcualquier práctica discriminatoria ilegal bajo el título VI puede presentar una queja con Pomona Valley Transportation Authority
- Para obtener más información sobre el programa derechos civiles capaz de industrias y el procedimientos para presentar una queja, llame al (909) 596-7664, o visite nuestra oficina administrativa en 2120 Foothill Blvd. Ste. 116, La Verne, CA. Para más información, visite www.pvtrans.org
- Un demandante puede presentar una queja directamente con el Federal Transit Administration por archivar una queja con la Office of Civil Rights,

Attention: Title VI Program Coordinator, East Building, 5th Floor TCR, 1200 New Jersey Ave., SE, Washington, DC 20590

- If information is needed in another language, contact 909-596-7664
- Si la información es necesaria en otro idioma hable al 909-596-7664
- 如果信息是需要另一种语言接触909-596-7664
- Nếu thông tin là cần thiết trong một ngôn ngữ khác tiếp xúc 909-596-7664

Pomona Valley Transportation Authority Title VI Notice to the Public (Chinese) 关于第 VI 条规定的公告

第 VI 条规定下应享权利公告

普慕纳谷运输署

• 普慕纳谷运输署 (Pomona Valley Transportation Authority) 按照《民权法》(Civil Rights Act) 第 VI 条之规定进行项目和服务运作,不得歧视任何种族、肤色和民族血统。

任何人如若认为遭到任何违反第 VI 条规定的非法歧视的侵害, 均可向普慕纳谷运输署投诉。

• 有关普慕纳谷运输署公民权利项目及投诉程序的详细信息,请联系 909-596-7664,或前往我们的管理办公室,地址为: 2120 Foothill Blvd. #116, La Verne, CA

有关更多信息,请访问 www.pvtrans.org

- •可以直接向联邦公共交通管理局 (Federal Transit Administration) 投诉 ,将投诉信按以下地址发送至民权办公室 (Office of Civil Rights) 即可: 收件人: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 909-596-7664 Si la información es necesaria en otro idioma comuniquese al 909-596-7664 如果需要以其他语言提供的信息,请致电 909-596-7664 Nếu thông tin là cần thiết trong một ngôn ngữ khác tiếp xúc 909-596-7664

Pomona Valley Transportation Authority Title VI Notice to the Public (Vietnamese) Thông Báo về Khoản VI

Thông Báo về Các Quyền Theo Khoản VI

Co Quan Quản Lý Giao Thông Pomona Valley

Cơ Quan Quản Lý Giao Thông Pomona Valley điều hành các chương trình và dịch vụ của mình không phân biệt chủng tộc, màu da, và nguồn gốc quốc gia, tuân thủ Khoản VI của Đạo Luật Dân Quyền.

Bất kỳ ai cho rằng mình đã bị phân biệt đối xử phi pháp theo Khoản VI có thể nộp đơn khiếu nại cho Cơ Quan Quản Lý Giao Thông Pomona Valley.

 Để biết thêm thông tin về chương trình dân quyền của Cơ Quan Quản Lý Giao Thông Pomona Valley, và các thủ tục nộp đơn khiếu nại, hãy liên hệ số 909-596-7664,

hoặc đến văn phòng hành chính của chúng tôi tại địa chỉ 2120 Foothill Blvd. #116, La Verne, CA

Để biết thêm thông tin, hãy truy cập www.pvtrans.org

Người khiếu nại có thể trực tiếp nộp đơn khiếu nại cho
 Cơ Quan Quản Lý Giao Thông Liên Bang bằng cách nộp khiếu nại cho
 Office of Civil Rights,

Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590

Nếu quý vị cần thông tin bằng một ngôn ngữ khác, hãy liên hệ số 909-596-7664
 Si la información es necesaria en otro idioma comuniquese al 909-596-7664

如果信息是需要另一种语言接触909-596-7664

Nếu quý vị cần thông tin bằng một ngôn ngữ khác, hãy liên hệ số 909-596-7664

List of Locations Where Title VI Notice Is Posted

Pomona Valley Transportation Authority notice to the public is currently posted at the following locations:

Location Name	Address	City
PVTA Offices	2120 Foothill Blvd., #116	La Verne
Revenue Service Vehicles (Including 5310 vehicles)		
Service Brochures		
Website	www.PVtrans.org	

The Title VI notice and program information is also provided on our website at www.PVTrans.org/Title VI

Title VI Complaint Procedures

As a recipient of federal dollars, Pomona Valley Transportation Authority 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. Pomona Valley Transportation Authority has in place a Title VI Complaint Procedure, which outlines a process for local disposition of Title VI complaints and is consistent with guidelines found in the Federal Transit Administration Circular 4702.1B, dated October 1, 2012. The Complaint Procedures and Complaint Form are posted on our website at www.PVTrans.Org/TitleVI.

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

Within 10 business days of receiving the complaint, PVTA Title VI Administrator George Sparks 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. Pomona Valley Transportation Authority 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, Pomona Valley Transportation Authority 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 Pomona Valley Transportation Authority 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 30 days after the date of the closure letter or the LOF to appeal to the Pomona Valley Transportation Authority Board of Directors or its designee. The complainant is entitled to review the denial, to present additional information and arguments, and to a separation of functions (i.e. a decision by a person not involved in with initial decision to deny eligibility). The complainant is entitled to receive written notification of the decision of the appeal and the reasons for it.

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.

Pomona Valley Transportation Authority Title VI Complaint Form

COMPLAINT FOR	(IVI			
Section I: Please write le	gibly		MATRIMO SINGERATURA NEL REPORTO DE PROPERTO A CARALLA PROPERTO A CARALLA PROPERTO DE PROPERTO DE PROPERTO DE P	
1. Name:				
2. Address:				
3. Telephone:		3.a. Secondary	Phone (Optional):	
4. Email Address:				
5. Accessible Format	[] Large Print		[] Audio Tape	
Requirements?	[] TDD	STATUTE VARIA NAS TUVISTANIENSES PROS	[] Other	00XVVS-24(4)(00xV/1)(0.00xV1)(
Section II:				
6. Are your filing this com	plaint on your ow	n behalf?	YES*	NO
*If you answered "yes" to				
7. If you answered "no" to complaint? Name:) #6, what is the n	ame of the pers	son for whom you are	filing this
8. What is your relationsh	ip with this individ	dual:		
9. Please explain why you	have filed for a th	nird party:		
10. Please confirm that yo	•	permission of	YES	NO
the aggrieved party to file	on their behalf.			
Section III:				
11. I believe the discrimination	ation i experience	ed was based on	(check all that apply):	
[] Race		[] Color		[] National
Origin				[]
_				
12. Date of alleged discrin				
13. Explain as clearly as p against. Describe all perso person(s) who discrimina any witnesses. If more sp	ons who were inv ted against you (i	olved. Include t f known), as we	he name and contact ell as names and conta	information of the act information of
F	omona Val	ley Transp	ortation Auth	ority
			orm Page 2	

COMPLAINT FORM

OOM LAME ON		
Section IV:		
14. Have you previously filed a Title VI complaint with	YES	NO
Pomona Valley Transportation Authority?	153	NU

Section V:	
15. Have you filed this complaint with any other Federa or State court?	, State, or local agency, or with any Federal
[]YES* []NO	
If yes, check all that apply:	
[] Federal Agency	[] State Agency
[] Federal Court	[] Local Agency
[] State Court	
16. If you answered "yes" to #15, provide information a where the complaint was filed.	bout a contact person at the agency/court
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 infor complaint.	mation that you think is relevant to your
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:
George Sparks, Title VI Coordinator	
Pomona Valley Transportation Authority	
2120 Foothill Blvd. #116 La Verne, CA 91750	

Procedimientos de quejas del Título VI

Como beneficiario de los fondos federales, se exige que Pomona Valley Transportation Authority cumpla con el Título VI de la Ley de Derechos Civiles de 1964 y garantice que los servicios y beneficios se proporcionen de manera no discriminatoria. Pomona Valley Transportation Authority establece un Procedimiento de quejas del Título VI, que describe un proceso para la disposición local de las quejas del Título VI y es coherente con las pautas que se encuentran en la Circular 4702.1B de la Administración

Federal de Tránsito, con fecha del 1 de octubre de 2012. Los Procedimientos de quejas y el Formulario de quejas están publicados en nuestro sitio web: www.PVTrans.Org/TitleVI.

Cualquier persona que considere que Pomona Valley Transportation Authority la ha discriminado por su raza, color o nacionalidad puede presentar una queja del Título VI al completar y enviar el Formulario de quejas del Título VI del organismo. Pomona Valley Transportation Authority investiga las quejas recibidas no más de 180 días después de haber ocurrido el presunto incidente. Pomona Valley Transportation Authority solo procesará las quejas que estén completas.

Dentro de los 10 días hábiles de haber recibido la queja, el administrador del Título VI de PVTA, George Sparks, la revisará a fin de determinar si nuestra oficina tiene jurisdicción. El demandante recibirá una carta de acuse de recibo que le informará si nuestra oficina investigará la queja. Pomona Valley Transportation Authority tiene 30 días para investigar la queja. El demandante será notificado por escrito de la causa a cualquier ampliación prevista de la norma de 30 días.

Si fuera necesaria más información para resolver el caso, Pomona Valley Transportation Authority puede comunicarse con el demandante. El demandante tiene 10 días hábiles a partir de la fecha de la carta para enviar la información solicitada al investigador asignado para el caso. Si el demandante no se pone en contacto con el investigador o este no recibe la información adicional dentro de los 10 días hábiles, Pomona Valley Transportation Authority puede cerrar el caso desde el punto de vista administrativo.

Un caso también se puede cerrar desde el punto de vista administrativo si el demandante ya no desea continuar con su caso. Una vez que el investigador haya revisado la queja, enviará una de dos cartas al demandante: una carta de cierre o una carta de conclusión (*letter of finding*, LOF). Una carta de cierre resume las acusaciones, y establece que no hubo violación del Título VI y que el caso se cerrará. Una LOF resume las acusaciones y las entrevistas en lo que respecta al presunto incidente, y explica si se tomará alguna medida disciplinaria, si el miembro del personal recibirá capacitación adicional o si se llevará a cabo alguna otra acción. Si el demandante desea apelar la decisión, tiene 30 días a partir de la fecha de la carta de cierre o LOF para apelar a la junta directiva de Pomona Valley Transportation Authority o su representante. El demandante tiene derecho a revisar la negación, presentar información y argumentos adicionales, y a una división de funciones (es decir, una decisión de una persona que no esté involucrada en la decisión inicial de la negación de la elegibilidad). El demandante tiene derecho a recibir una notificación por escrito de la decisión de la apelación y los motivos de esta.

Una persona también puede presentar una queja directamente ante la Administración Federal de Tránsito, en la Oficina de Derechos Civiles de la Administración Federal de Tránsito, 1200 New Jersey Avenue SE, Washington, DC 20590.

Formulario de quejas del Título VI de Pomona Valley Transportation Authority

FORMULARIO DE QUEJAS

Sección	1:	Escriba	de manera	leaible
0.000.011	10000	moor no w	Cre fillelile, cr	1091010

1. Nombre:

Pomona Valley Transportation Authority

Title VI Program

2. Dirección:					
3. Teléfono:		3.a. Teléfono secundario (Opcional):			
4. Dirección de correo elect	trónico:				
5. ¿Requisitos de formato	[] Letra grande		[]	Cinta de audio	
accesible?	[] TDD		[]	Otros	
Sección II:					
6. ¿Está presentando esta o	jueja en su propio	nombre?	SÍ*		NO
*Si respondió "Sí" a la preg	unta n.º 6, diríjase	a la Sección III.			
7. Si respondió "No" a la pro esta queja? Nombre:	egunta n.º 6, ¿cuá	l es el nombre de	la pe	ersona para la que	e está presentando
8. ¿Cuál es su relación con e	esta persona?:				
9. Explique por qué ha pres	entado una queja	para un tercero:			
10. Confirme que ha obteni demandante para presenta	•	•	SÍ		NO
Sección III:					
11. Considero que la discrin correspondan):	ninación que expe	rimenté se debió	a mi	(marque todas las i	opciones que
[] Raza		[] Color		[] Nacionalidad
12. Fecha de la presunta dis	scriminación: (dd/n	nm/aaaa)			
13. Explique con la mayor con la todas las personas involuciones lo discriminaron (si conoce cualquier testigo. Si necesita	cradas. Incluya el r esta información),	nombre y la inforr así como el nom	nació bre y	ón de contacto de · la información de	la(s) persona(s) que
F	ormulario d	de queias de	el T	itulo VI de	

Formulario de quejas del Título VI de Pomona Valley Transportation Authority, página 2 FORMULARIO DE QUEJAS

Sección IV:		
14. ¿Ha presentado anteriormente una queja del	cí	NO
Título VI ante Pomona Valley Transportation Authority?) St	NO

Sección V:	
15. ¿Ha presentado esta queja ante cualquier otro c cualquier tribunal federal o estatal?	organismo federal, estatal o local, o ante
[]SÍ* []NO	
Si la respuesta es "Sí", marque todas las opciones qu	ue correspondan:
[] Organismo federal	[] Organismo estatal
[] Tribunal federal	[] Organismo local
[] Tribunal estatal	_
16. Si respondió "Sí" a la pregunta n.º 15, proporcio en el organismo/tribunal en el que presentó la quej	· ·
Nombre:	
Cargo:	
Organismo:	
Dirección:	
Teléfono: Cor	reo electrónico:
Sección VI:	
Nombre del organismo de tránsito en el que se pres	entó la queja:
Persona de contacto:	
Teléfono:	
Puede adjuntar cualquier material escrito u otra queja. La firma y la fecha son obligatorias a continuació	
La mina y la recha son obligatorias a continuació	n para completar el formalació.
Firma	Fecha
Presente este formulario personalmente o envíe George Sparks, coordinador del Título VI	lo por correo a la siguiente dirección:

Title VI Complaint Procedures & Complaint Form (Chinese)

Pomona Valley Transportation Authority 2120 Foothill Blvd. #116 La Verne, CA 91750

第VI条规定投诉程序

作为联邦资金的接收方,普慕纳谷运输署 (Pomona Valley Transportation Authority) 需要遵守 1964 年《民权法案》(Civil Rights Act) 的第 VI 条规定,并确保在无歧视的基础之上提供服务和福利。普慕纳谷运输署已经实施了第 VI 条规定投诉程序,其中列出了在本地对有关第 VI 条规定的投诉进行处理的流程,并与 2012 年 10 月 1 日颁布的联邦公共交通管理局 (Federal Transit Administration) 4702.1B 号通告中制定的指导方针一致。我们的网站上发布了投诉程序和投诉表格,网址为 www.PVTrans.Org/TiltVI。

任何人如果认为自己因种族、肤色或民族血统而受到普慕纳谷运输署的歧视,可以填写并提交该机构的第 VI 条规定投诉表,以依据第 VI 条规定进行投诉。普慕纳谷运输署将在收到对所指控事件的投诉后 180 天内对投诉开展调查。慕纳谷运输署将仅处理完整投诉。

在收到投诉后的 10 个工作日内,普慕纳谷运输署负责第 VI 条规定的管理员 George Sparks 将对投诉进行审核,以确定我们的办公室是否具有管辖权。投诉人将收到一封确认函,通知她/他我们的办公室是否会对投诉开展调查。普慕纳谷运输署有 30 天时间来调查投诉。如果计划按"30 天规则"延长期限,将以书面形式通知投诉人延期原因。

如果需要更多信息才能解决案件,普慕纳谷运输署可能会与投诉人联系。自收到函件起,投诉人有 10个工作日的时间将所请求的信息发送给被指定处理该案件的调查人员。如果在 10个工作日内,投诉人未 与调查人员联系,或者调查人员没有收到更多信息,则普慕纳谷运输署可以通过行政方式结案。

如果投诉人不再希望追究其案件,则也可以通过行政方式结案。在调查人员审核投诉后,她/他将向投诉人发出以下两封函件之一:结案函或结果函 (LOF)。结案函将对指控进行总结,声明不存在违反第 VI 条规定的行为,并由此结案。LOF 将对指控和与指控事件相关的面谈情况进行总结,并解释是否会对职工实施纪律处分、进行额外培训或采取其他措施。如果投诉人希望对该裁决提出上诉,则她/他在收到结案函或 LOF 后,有 30 天时间向普慕纳谷运输署董事会或其指定人员提出上诉。投诉人具有以下权力:对否定性裁决进行审核;呈交更多信息和论据;以及提出职能分离(即要求由与否定资格的初步裁决无关的其他人员作出裁决)。投诉人有权接收有关上诉裁决及其理由的书面通知。

个人还可以直接向联邦公共交通管理局提交投诉,地址为: FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590

普慕纳谷运输署第 VI 条规定投诉表格 投诉表格

第 I 部分:	请清晰书写			
1. 姓名:				
2. 地址:				

Pomona Valley Transportation Authority Title VI Program

3. 电话:		3.a.备用电话(遊填) ,	
4. 电子邮件地址:					
5. 对于可访问的格式是	[] 大字体		[]	录音磁带	
否有要求?	[] TDD		[]	其他	
第Ⅱ部分:	OMS SINGS (2017 SSM) SERVICE STREET SERVICES SOMESTIC SERVICES SERVICES				
6. 您是否代表自己提交本	投诉?		是*		否
*如果您对第6项回答"是	ễ",请转到第Ⅲ	部分。			
7. 如果您对第 6 项回答"	否",您为其提交	で本投诉的人员に	的姓名	呂是什么?姓名:	
8. 您与此人是什么关系:					
9. 请解释您为何代表第三	方提交本投诉:				
10. 请确认您已获得指控方	5的华可 可以份	丰 甘坦			
10. 炯炯 从总 口须行用工人) H3 KF EQ () EQ ()	水 壳灰又汉	是		否
第Ⅲ部分:	CONSTRUCTION OF STRUCTURE				
11. 我认为我遭遇的歧视是	是基于以下原因 (请选中所有适用过	生项)	:	
	是基于以下原因 <i>(</i>		生项)		1 民族血统
11. 我认为我遭遇的歧视是 [] 种族	是基于以下原因 <i>(</i>	请选中所有适用总	生项)] 民族血统
		[] 肤色	选项)] 民族血统

普慕纳谷运输署 第 VI 条规定投诉表格, 第 2 页

拟记	表格
コメット	1X TH

W 4 7 1 4 4 11 13	
第Ⅳ部分:	

14. 您以前是否曾向普慕纳谷运输署提交过有关第 VI 是 否 图
第٧部分:
15. 您是否曾向任何其他联邦、州或本地机构,或向任何联邦或州法院提交过本投诉?
[]是* []否
如果回答为"是",请选中所有适用选项:
[]联邦机构[]州机构
[] 联邦法院[] 本地机构
[]州法院
16. 如果您对第 15 项的回答为"是",请提供有关接受所提交投诉的机构/法院的联系人的信息。
姓名:
职务:
机构:
地址:
电话: 电子邮件:
第 VI 部分:
投诉所针对的运输署的名称:
联系人:
电话:
您可以附上您认为与自己的投诉相关的任何书面材料或其他信息。
您需要在下面注明签名和日期方可完成本表格:
签名 日期
请亲自提交此表格,或将此表格邮寄到下面的地址:
George Sparks, Title VI Coordinator
Pomona Valley Transportation Authority 2120 Foothill Blvd. #116 La Verne, CA 91750

Title VI Complaint Procedures & Complaint Form (Vietnamese) Thủ Tục Khiếu Nại Theo Khoản VI

Là đơn vị nhận tài trợ liên bang, Cơ Quan Quản Lý Giao Thông Pomona Valley phải tuân thủ Khoản VI của Đạo Luật Dân Quyền ăm 1964 và đảm bảo không phân biệt đối xử trong cung cấp các dịch

vụ và phúc lợi. Cơ Quan Quản Lý Giao Thông Pomona Valley có áp dụng Thủ Tục Giải Quyết Khiếu Nại Khoản VI, thủ tục này mô tả quy trình giải quyết cục bộ đối với khiếu nại Khoản VI và phù hợp với các quy định được tìm thấy trong Thông Tư 4702.1B của Cơ Quan Quản Lý Giao Thông Liên Bang, ngày 1 tháng 10, 2012. Thủ Tục Giải Quyết Khiếu Nại và Mẫu Đơn Khiếu Nại được đăng trên trang web của chúng tôi tại www.PVTrans.org/TiltVI.

Bất kỳ ai cho rằng mình đã bị Cơ Quan Quản Lý Giao Thông Pomona Valley phân biệt đối xử dựa trên chủng tộc, màu da, hoặc nguồn gốc quốc gia có thể nộp đơn khiếu nại Khoản VI bằng cách điền và nộp Mẫu Đơn Khiếu Nại Khoản VI của cơ quan. Cơ Quan Quản Lý Giao Thông Pomona Valley sẽ điều tra các khiếu nại nhận được không quá 180 ngày sau khi xảy ra sự việc bị cáo buộc. Cơ Quan Quản Lý Giao Thông Pomona Valley sẽ chỉ giải quyết những đơn khiếu nại hoàn chỉnh.

Trong vòng 10 ngày làm việc sau khi nhận được khiếu nại, Quản Trị Viên Khoản VI của PVTA, George Sparks sẽ xem xét khiếu nại để xác định xem văn phòng của chúng tôi có thẩm quyền hay không. Người khiếu nại sẽ nhận được thư xác nhận thông báo liệu đơn khiếu nại sẽ được văn phòng của chúng tôi điều tra hay không. Cơ Quan Quản Lý Giao Thông Pomona Valley có 30 ngày để điều tra khiếu nại. Người khiếu nại sẽ được thông báo bằng văn bản về lý do gia hạn ngoài kế hoạch đối với quy định 30 ngày.

Nếu cần thêm thông tin để giải quyết hồ sơ,Cơ Quan Quản Lý Giao Thông Pomona Valley có thể liên lạc với người khiếu nại. Người khiếu nại có 10 ngày làm việc kể từ ngày nhận được thư để gửi thông tin được yêu cầu cho điều tra viên được giao phụ trách hồ sơ. Nếu người khiếu nại không liên lạc với điều tra viên hoặc điều tra viên không nhận được thông tin bổ sung trong vòng 10 ngày làm việc, Cơ Quan Quản Lý Giao Thông Pomona Valley có thể khép hồ sơ về mặt hành chính.

Hồ sơ cũng có thể được khép lại về mặt hành chính nếu người khiếu nại không còn muốn theo đuổi vụ việc nữa. Sau khi điều tra viên xem xét khiếu nại, điều tra viên sẽ gửi một trong hai thư cho người khiếu nại: thư khép hồ sơ hoặc thư thông báo phát hiện (LOF). Thư khép hồ sơ sẽ tóm tắt những cáo buộc và cho biết không có sự vi phạm Khoản VI và hồ sơ sẽ bị khép lại. Một LOF sẽ tóm tắt các cáo buộc và những nội dung thẩm vấn về sự việc bị cáo buộc, và giải thích liệu sẽ có bất kỳ biện pháp khắc phục, đào tạo bổ sung cho nhân viên, hay biện pháp khác hay không. Nếu người khiếu nại muốn kháng nghị quyết định, người khiếu nại có 30 ngày sau ngày nhận thư khép hồ sơ hoặc LOF để kháng nghị lên Hội Đồng Quản Trị của Cơ Quan Quản Lý Giao Thông Pomona Valley hoặc người được chỉ định của hội đồng quản trị. Người khiếu nại có quyền xem quyết định từ chối, trình bày thông tin và lý lẽ bổ sung, và quyền yêu cầu phân tách chức năng (có nghĩa là quyết định của một người không tham gia quyết định từ chối điều kiện nhận dịch vụ ban đầu). Người khiếu nại có quyền nhận được thông báo bằng văn bản về quyết định đối với kháng nghị và lý do đưa ra quyết định.

Một người cũng có thể trực tiếp nộp khiếu nại cho Cơ Quan Quản Lý Giao Thông Liên Bang, tại địa chỉ FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590

Mẫu Đơn Khiếu Nại Khoản VI của Cơ Quan Quản Lý Giao Thông Pomona Valley ĐƠN KHIẾU NAI

Phần I: Vui lòng viết rõ

1. Tên:

Pomona Valley Transportation Authority

Title VI Program

2. Địa chỉ:					
3. Điện thoại:		3.a. Số Điện Th	oại Phụ <i>(Không Bắt Buộc</i>	c):	
4. Địa Chỉ Email:					
5. Có Yêu Cầu về Định	[] Chữ In Lớn	,,,	[] Băng Tiếng	[] Băng Tiếng	
Dạng Dễ Tiếp Cận Hay Không?	[] TDD		[] Khác		
Phần II:					
6. Quý vị nộp đơn khiếu nạ	i này thay mặt chír	ıh mình?	CÓ*	KHÔNG	
*Nếu quý vị trả lời "có" cho	o câu hỏi #6, hãy đ	ến Phần III.			
7. Nếu quý vị trả lời "không giúp họ? Tên:	g" cho câu hỏi #6,	vui lòng cho biết	tên của người mà quý v	i nộp đơn khiếu nại	
8. Vui lòng cho biết quan h	ệ của quý vị với ng	gười này:			
9. Vui lòng giải thích tại sao	o quý vị nộp đơn c	ho một bên thứ b	a:		
10. Vui lòng xác nhận rằng quý vị đã được bên khiếu nại cho		n khiếu nại cho	CÓ	KHÔNG	
phép nộp đơn thay mặt họ. Phần III:	and the second s				
11. Tôi tin rằng tôi đã bị ph	ân biệt đối xử dựa	trên <i>(chọn tất cả c</i>	ác trường hợp phù hợp):		
[] Chủng tộc Nguồn Gốc Quốc Gia		[] M	làu da	[]	
12. Ngày xảy ra sự phân biệ	ệt đối xử bị cáo bượ	ộc: (tháng/ngày/nă	m)		
13. Giải thích càng rõ càng tốt về sự việc đã xảy ra và tại sao quý vị cho rằng quý vị đã bị phân biệt đối xử. Mô tả tất cả những người liên quan. Bao gồm tên và thông tin liên lạc của (những) người đã phân biệt đối xử đối với quý vị (nếu biết), cũng như tên và thông tin liên lạc của bất kỳ nhân chứng nào. Nếu cần thêm chỗ viết, hãy đính kèm các tờ giấy bổ sung					

Cơ Quan Quản Lý Giao Thông Pomona Valley Đơn Khiếu Nại Theo Khoản VI, Trang 2

ĐƠN KHIẾU NẠI

DOIN TRANSCO INTAK		
Phần IV:		
14. Trước đây quý vị có từng nộp đơn khiếu nại Khoản	CÓ	KHÔNG
VI cho Cơ Quan Quản Lý Giao Thông Pomona Valley		

hay không?	
Phần V:	
15. Quý vị có từng nộp đơn khiếu nại cho bất kỳ cơ quan n phương, hoặc cho bất kỳ tòa án nào của Liên Bang hay Tiể	
[]CÓ* []KHÔNG	
Nếu có, hãy chọn tất cả các trường hợp phù hợp:	
[] Co Quan Liên Bang	[] Cơ Quan Tiểu Bang
[] Tòa Án Liên Bang	[] Cơ Quan Địa Phương
[] Tòa Án Tiểu Bang	_
16. Nếu quý vị trả lời "có" cho câu hỏi #15, hãy cung cấp t quan/tòa án nơi nộp khiếu nại.	hông tin về một người liên lạc tại cơ
Tên:	
Chức danh:	
Co quan:	
Địa chỉ:	
Diện thoại: Ema	nil:
Phần VI:	
Tên của Cơ Quan Giao Thông bị khiếu nại:	
Người Liên Lạc:	·
Điện thoại:	
Quý vị có thể đính kèm bất kỳ tài liệu văn bản hoặc th quan đến khiếu nại của mình. Bắt buộc ký tên và ghi ngày tháng để hoàn tất mẫu đơn	1.
Chữ ký	Ngày
	qua đường bưu điện đến địa chỉ bên dưới:
- ·	
• •	
	Mady

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

Since the approval of this report, Pomona Valley Transportation Authority has not been involved in any transportation-related Title VI investigations, lawsuits or complaints.

Pomona Valley Transportation Authority

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.				



TITLE VI PROGRAM

Public Participation Plan

Developed: May 2020 Approved by Pomona Valley Transportation Authority Board of Directors: June 10, 2020

George Sparks, PVTA Administrator
Pomona Valley Transportation Authority
2120 Foothill Blvd. #116
La Verne, CA
909-596-7664
WWW.PVTRANS.ORG

Table of Contents

Public Participation Plan	22
Summary of Outreach Efforts Made Since 2017	27

1. Introduction

Purposes of This Plan

As part of its Title VI Program, Pomona Valley Transportation Authority (PVTA) is bolstering its public participation processes. PVTA is also enhancing its strategies for engaging minority and Limited English Proficient individuals. This plan provides guidelines for involving the public in PVTA planning efforts to ensure that all groups are represented and their needs considered.

PVTA is committed to ensuring it serves the Pomona Valley fairly, consistently and in the most cost-efficient and appropriate manner within available resources. Through conversation and collaborating with riders, prospective riders, and the larger surrounding community, PVTA will be able to assess the quality of its service, measure potential impacts to the community from PVTA

initiatives or proposed initiatives, and ensure that it is providing valuable services to the residents and visitors of the Pomona Valley.

2. Public Participation Process

Approach to Public Participation

The public participation process should be considered at the earliest stages of any PVTA project that may impact the surrounding community, its riders, and potential riders. As projects vary in time and size, the public participation process may vary for each, as well as the extent of public participation. The following outlines tools and strategies to ensure that public input is invited and all foreseeable impacts to the community are considered.

Examples of Events or Service Changes that will require a public participation plan are:

- Changes to fares, service area or revenue hours
- Short and Long Range Transportation Plan, Comprehensive Operational Analysis
- Studies to implement new services; facilities or yard construction projects

Outreach Requirements and Activities

The following activities are intended to serve as guidelines for outreach to ensure that all riders and potential riders in the Pomona Valley have equal access and opportunity to participate in transportation planning and decision-making. These also provide strategies for soliciting input and engaging various communities.

Any notices will be posted at least two weeks prior to the public event.

- Notices may be posted at PVTA headquarters, on buses and at key community centers with whom PVTA has relationship.
- Information about public participation opportunities will also be posted on PVTA's website at least two weeks prior to the event.
- Comments will be accepted via the PVTA website, at public outreach

events, via email, by mail, and by phone to ensure that all populations have the opportunity to participate.

Outreach Methods to Engage Minority and Limited English Proficient Populations

- Spanish and Chinese language notices will be developed and posted with English notices.
- Notices in Spanish & Chinese will be provided on vehicles serving areas with concentrations of LEP individuals in those language groups.
- Event information on PVTA's website will be posted in English, Spanish and Chinese as appropriate and necessary.
- PVTA will distribute event information to community groups and agencies that work with LEP populations, if such contacts exist.
- PVTA staff as is possible will provide interpretation or translation at any public meetings or workshop. When it is appropriate or necessary, PVTA will insure non-English language interpretation in additional language is available.

Currently, Spanish and Chinese are the only quantifiable populations within PVTA's service area that are limited English proficient. PVTA will continue assessing the language needs of citizens in its service area through its Language Assistance Plan. At such time, as another group with limited English proficiency reaches significant mass, PVTA will review this plan and its strategies to engaging with non-English speaking populations.

Some larger projects will require a specific public participation plan that will be developed in the planning stages of the project. This plan will outline specific outreach activities, goals and objectives of the public involvement, as well as specific techniques to be used for outreach activities. The project-based public participation plan will also identify any populations requiring special outreach to ensure they have access to information and the opportunity to make comments regardless of race, religion, age, income, color, national origin, or disability.

The public participation process for these projects will be augmented with specific outreach activities appropriate for the particular projects, such as, additional public workshops, focus groups and surveys. Where more than one public workshop or forum will be held, and as funding allows, one workshop will be held in the morning and a second in the evening to accommodate varying schedules. As is possible, public participation events will be held at central locations close to a bus stop in an ADA accessible room. These projects may also require the development such as fact sheets, newsletters, a project webpage, and additional media releases.

Outreach methods to engage minority and limited English proficient populations

- PVTA will continue cultivating relationships with community agencies that serves LEP populations.
- As they are identified, notices will be sent to Spanish and Chinese language magazines, newspapers, and/or radio stations.
- Public outreach events may include attending already existing community meetings and gatherings, such as school meetings, farmers markets, faith-based events, and other community activities in order to invite participation from LEP populations who may not attend PVTA hosted public events.
- PVTA will ensure that non-English language interpretation will be available at any public meeting or workshop as is appropriate and necessary

Summary of Outreach Efforts Made Over the Last Three Years

PVTA's Administrator, Senior Program Manager and Mobility Managers participates in these recurring events:

- Presentations to Senior Centers/Community Centers/ Senior Living- Over the last three years 67 presentations were made to six senior centers, 3 senior living facilities and 2 community centers in 4 different cities. The presentations cover Get About services and specialized local programs operated by PVTA on behalf of member cities, our two New Freedom projects, One Step Over Line and Ready Now. As a portion of the each presentation there was an opportunity to ask questions and provide feedback to PVTA staff about service issues and needs. Presentations are always available in English and Spanish depending on the needs of the community. Informational materials, such as, brochures were provided in both languages as well. PVTA staff conducted a presentation at Emmerson Village Senior Living with a Korean translator.
- **Claremont Village Venture-**PVTA participates annually at Claremont Village Venture a street fair drawing over 15,000 people.
- Claremont & San Dimas Earth Day- PVTA staff participated in the cities Earth days to promote all PVTA services.
- **Senior Health Fairs and Other Special Events-**PVTA staff periodically participates in local transportation and senior events held in the Pomona Valley.
- Rider and Community Surveys--During the last three years PVTA conducted 6 surveys riders of our various surveys and the members of the community. In January of 2019, AMMA Transit Planning conducted mail in surveys to PVTA riders. Surveys were sent out in both English and Spanish.



TITLE VI PROGRAM Language Assistance Plan

Developed: May 2020 Approved by Pomona Valley Transportation Authority Board of Directors: June 10, 2020

George Sparks, PVTA Administrator Pomona Valley Transportation Authority 2120 Foothill Blvd. #116 La Verne, CA 909-596-7664 WWW.PVTRANS.ORG

Table of Contents

Introduction	31
Overview of PVTA's Service Area and Services	32
Language Assistance Goals	32
Safe Harbor Provision	33
Results of the Four Factor Analysis	34
Factor 1	34
Factor 2	35
Factor 3	36
Factor 4	37
Implementation Plan	39
Timeline/Major Milestones	39
Language Service Provision	43
PVTA Website	45

Pomona Valley Transportation Authority

_			
Ti∳l∠	. WI	Dro	gran
1111	. V I	110	EI OII

Outreach	45
Monitoring, Evaluating and Updating the LAP	45
Staff Training	46

1. Introduction

This language Assistance Plan was developed during the process of preparing PVTA's Title VI Program to ensure that PVTA services are accessible to limited English Proficient (LEP) individuals. Title VI of the 1964 Civil Right Act is one of two federal mandates that guarantee the provision of meaningful access to federally-funded services for LEP individuals:

- Title VI of the 1964 Civil Right Act prohibits federally-funded agencies from discriminating against individuals based on race, color, and national origin and includes meaningful access to LEP customers.
- President's Executive Order 13166, "improving Access to Services for Persons with Limited English Proficiency" (August 11, 2000): Instructs federal agencies to improve access to services by mandating that any federally conduced or assisted programs of activities (e.g. recipients of federal funding) must provide meaningful access to LEP customers.

PVTA's Title VI Program was prepared in the Winter of 2017 in accordance with FTA Circular 4702.1B, Title VI Requirements and Guidelines for Federal Transit Administration Recipients, October 1, 2012.

PVTA's Title VI Program Administrator is:
George L. Sparks, Administrator
PVTA
2120 Foothill Blvd, Ste. 116
La Verne, CA 91750
909-596-7664
Email - glspvta@gmail.com
More information about PVTA's Title VI Program is available at: www.pvtrans.org/titleVI

2. Overview of PVTA's Service Area and Services

The Pomona Valley is located approximately 30 miles east of Los Angeles. PVTA is a Joint Powers Authority serving the cities of Claremont, La Verne, Pomona and San Dimas with a service population of 253,000

PVTA is the community transit provider for the Pomona Valley. Its primary service, Get About, is an elderly and disabled demand response service. Get About operates throughout the four cities. Get About operates 6:00 a.m. to 7:30 p.m. weekdays, 8:30 a.m. to 5:00 p.m. Saturdays and 7:30 a.m. to 5:00 p.m. Sundays. Get About carries approximately 130,000 passengers annually.

PVTA also operates three other demand response services on behalf of member cities, the Claremont Dial-a-Ride, Pomona Group Service and San Dimas Dial-a-Cab. In FY 2019 PVTA operated approximately 633,000 miles and carried 170,000 passengers.

PVTA provides all its transit services via private contractors. PVTA has two service contracts. One for dedicated vehicle services and the other for demand response services (cab). PVTA has a fleet of 26 cut-a-way vehicles and 5 accessible minivans. Fleet operations are supplemented by use of a cab provider. PVTA offices are located at 2120 Foothill Blvd, Ste. 116, La Verne, CA 91750.

3. Language Assistance Goals

PVTA's goal is provide meaningful access for LEP customers to PVTA's services, information and materials by developing a Language Assistance Plan and by regular evaluation of the developed methods and strategies.

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."

Based on our analysis of census data there are three languages groups whose representation exceeds the levels stipulated in the DOJ's Safe Harbor Provision. These languages are Spanish and Chinese. Accordingly, PVTA will provide written translations of its vital documents into the aforementioned languages. Translations of the Title VI notice. Translation of non-vital documents, if needed, will be provided orally or in written form depending on the frequency of the need for these translations.

4. Results of the Four Factor Analysis

Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient.

PVTA used available census data to determine the geographic boundaries of its service area and identify LEP populations within that area. PVTA utilized the Census Bureau Table 16001 to identify languages spoken by individuals. This table showed data for the eastern San Gabriel Valley Region of Los Angeles County which includes Claremont, La Verne, Pomona, and San Dimas.

Based on our analysis we found six language groups with populations of LEP individuals greater than the Safe Harbor Provision level of over 5% or 1000 individuals (whichever is less).

<u>Language</u>	# of LEP Individuals
Spanish	36,587
Chinese	6,023
Arabic	1,713
Tagalog	1,469
Vietnamese	1,399
Korean	1,393

Spanish and Chinese have the largest population of LEP individuals in PVTA's service area. Considering the margin of error, the following languages will continue to be monitored: Arabic, Tagalog, Vietnamese, and Korean. PVTA conducted a driver and dispatch survey which shows no encounter with Arabic speakers and extremely low encounters with Tagalog, Vietnamese and Korean speakers. While PVTA will not immediately translate vital documents into these languages, it will continue to monitor proportions of LEP individuals among these groups.

The results	of the anal	lysis are	shown	below	in Tab	ole 4-1.
		,				

Pomona Valley American Community Survey						
Ability to speak English	Population	%				
Total Population	299,857	100%				
Language Other than English	140,308	46.79%				
LEP Spanish	36,587	12.2%				
LEP Chinese	6,023	2.0%				
LEP Arabic	1,713	0.6%				
LEP Vietnamese	1,399	0.5%				
LEP Korean	1,393	0.5%				
LEP Tagalog	1,469	0.5%				

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

PVTA used a staff survey to gauge the frequency of contact with its services by LEP persons. The survey included 25 drivers and 17 call takers/dispatchers. The results are summarized below:

- 1. All (25) drivers and (17) call takers/dispatchers came in contact with LEP individuals.
- 2. All (25) drivers and all call takers/dispatchers indicated they had contact with LEP individuals several times a day.
- 3. All dispatchers and Eleven (11) drivers indicated contact with LEP individuals that were non-Spanish speaking. All dispatchers stated the other LEP languages they were able to identify were Chinese, and very few speak Tagalog.

Based on the information from the staff survey, Spanish speaking individuals are accessing PVTA's services daily. Other LEP individuals are accessing the PVTA services far less often. Based on information derived from the development of the Title VI plan, PVTA will continue outreach using Spanish and Chinese language information and materials. PVTA will continue to monitor contact with LEP individuals who speak Arabic, Vietnamese, Korean and Tagalog.

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

PVTA's transportation services provide our riders with access to many vital resources. These include medical appointments, therapy, shopping, and employment as well as centers of social activities like senior centers.

Results of LEP Outreach Activity (as it relates to importance of services)

The importance of PVTA services is illustrated by the results of a survey of 62 Get About riders conducted in July 2019.

2019 Get About Rider Survey

72% - Have used Get About for medical appointments

38% - Have used Get About for shopping

89% - Indicate they have incomes below \$30,000 annually

68% - Make use of a wheelchair or Mobility Device

85% - Do not own a car

Based on this information it is clear that PVTA serves many transit dependent individuals for whom its services are the primary transportation resource. For this reason PVTA is committed to translating vital documents relating to its services. Vital documents are those that demonstrate how to use PVTA services, how to access services and additional information, and information about PVTA's Title VI program.

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

In PVTA's Public Participation Plan, we laid out the types of outreach activities that will be undertaken for various public events. A large portion of outreach will be accomplished through cultivating relationships with key contacts within the LEP populations. PVTA will keep this network of contacts informed of activities, services, and events. PVTA works with them to connect with the LEP populations. Use of this network will be a key element in PVTA's outreach strategy and will have little or no associated costs.

We provide the Get About and Claremont DAR brochures in Spanish. Promotional materials and announcements for these services are provided in Spanish in communities with high concentrations of LEP individuals. We utilize bilingual personnel in positions coming into frequent contact with LEP individuals. Currently, Thirteen (13) of our Twenty Five (25) drivers and twelve (12) of our Seventeen (17) dispatchers are fluent in both English and Spanish. Out of our driver One (1) speak Tagalog, One (1) speaks Vietnamese, and One (1) speaks Chinese.

Table 4-2, below, identifies several potential outreach strategies that may be utilized as is appropriate and their associated costs

Pomona Valley Transportation Authority Title VI Program

TITLE VI PROGRAM FOUR FACTOR ANALYSIS: FACTOR 4

Translation of Written Documents	litten Doduments	Interpretation & Translation Services	anslation Services	Advertisements & Outreach	& Outreach
Specific elements	Unit Costs (range)	Specific elements	Unit Costs	Specific elements	Unit Costs
Vital Documents:		Workplace Languages	Varies	Availability of	TBD
				language	
				assistance poster	
				development and	
				printing	
Title VI Notice to the Public		Simultaneous interpreter	TBD	LEP-language	TBD
		for level two public events		radio spots	
				(optional)	
Complaint Form	\$100-\$200	Workplace Languages		Adverts in LEP-	
				langnage	
				publications	
	***************************************			(optional)	
Complaint Procedures	\$100-\$200	Workplace Languages			
Rider Guide	\$100-\$200	Workplace Languages			
ADA Application	\$100-\$200				
Signage advertising PVTA's	\$100-\$200				
language assistance					
program					
System Map	N/A				
Individual route schedules	N/A				
where practical					
Ad-hoc Documents:					
Fliers/advertisements for	\$100-\$200	Workplace Languages			
public events				***************************************	
Website	Translation through google		The state of the s		

5. Implementation Plan

Timeline/ Major Milestones

Table 5-1 below lists the major activities associated with this Plan and assigns each an anticipated date to be started or completed. Activities that have been labeled with the "NOW" category are those that have already been completed or are currently in progress.

Table 5-1

Task 1: Identifying LEP Individuals Who Need Language Assistance

	ITEM	NOW	Next Year Beginning 7/1
1.1	 Assess the LEP population in PVTA's service area Four Factor Framework Analysis Outreach to community groups serving LEP persons Interview/survey PVTA staff and contractor personnel about previous experience with LEP individuals 	х	
1.1	Identify areas within the service district and routes serving areas with high concentrations of LEP individuals.	х	

Task 2: Language Assistance Measures

Developing Assistance Procedures

	ITEM	NOW	Next Year Beginning 7/1
2.1	Develop a list of language assistance products and methods and how PVTA can access these.	х	
2.2	 Develop procedures for <i>customer service staff</i> regarding: how to respond to LEP callers how to respond to correspondence from LEPs how to respond to LEPs in person how to document LEP needs how to respond to civil rights complaints. 	х	
2.3	Develop procedures for <i>vehicle operators, station managers, and others</i> who regularly interact with the public on how to respond to an LEP individual.	х	

Table 5-1, Continued

Task 2: Language Assistance Measures
Translating documents

	ITEM	NOW	Next Year Beginning 7/1
2.4	Develop a process for determining: If a particular document needs to be translated into which languages it should be translated.	х	
2.5	 Translate vital documents, including: PVTA brochures Polices Service changes Title VI Civil Rights Notice, Complaint Form and Procedures Get About Application 	х	

Task 2: Language Assistance Measures
Live Interpretation or Translation

	ITEM	NOW	Next Year Beginning 7/1
2.6	Develop a list of language assistance products and methods and how PVTA can access these.	х	
2.7	Establish competency standards for interpreters and translators; including: PVTA will determine the interpreter or translator's competency in English and the other language; PVTA will train the interpreter in specialized terms; PVTA will instruct the interpreter or translator that he or she should not deviate into a role as counselor, legal advisor, or any other role aside from interpreting; PVTA will ask the interpreter to attest that s/he does not have a conflict of interest on the issues that they would be providing interpretation services.	X	
2.8	Develop a PVTA policy that states that all interpretation and written translation must be performed by approved vendors/individuals whose competency has been established.	х	

Table 5-1, Continued

Task 3: Training Staff

	ITEM	NOW	Next Year Beginning 7/1
3.1	Identify which PVTA staff and contractor personnel are likely to come into contact with LEP individuals	Х	
3.2	Develop procedure/schedule for LEP training for identified PVTA staff and contractor personnel, for new-hires, and continued training	Х	
3.3	Develop curriculum for and train frontline, customer service, and staff likely to interact (operators, etc.) with LEPs in language assistance procedures identified in 2.1 and 2.2 and 2.3	х	

Task 4: Providing Notice to LEP Persons

	ITEM	NOW	Next Year Beginning 7/1
4.1	Inventory the existing public service announcements and community outreach PVTA currently performs.	х	
4.2	Incorporate notice of the availability of language assistance into existing outreach methods Develop language regarding language assistance in multiple languages for posters/signage/notices Develop non-English outreach materials: Place foreign-language ads in publications serving second language populations to share current significant, service-related announcements Place a notice of right to language assistance, at no cost, on important outreach documents and on PVTA's website.		X
4.3	Create sign in multiple languages informing LEP clients about available language services and post		X

4.4	 Undertake targeted community outreach to LEP populations. Continue developing relationships with community leaders & LEP populations identified during Four Factor Analysis 	x	
	 Develop policy for when (what type of service changes/announcements) to conduct targeted community meetings for LEP populations 		

Task 5: Monitor and Update the Language Assistance Plan

	ITEM	NOW	Next Year Beginning 7/1
5.1	Assign Day-to-day administration of LEP program, ensuring compliance and correct implementation.	x	
5.2	Develop a process for receiving feedback on language assistance measures Add a question to any surveys to assess respondents' English proficiency and primary spoken language. On-going dialogue with groups serving LEP populations Review demographic changes reported by Census data	х	
5.3	Conduct internal monitoring regarding language assistance measures Routinely survey/interview PVTA staff about interaction with LEPs and their ability to successfully interact	х	
5.4	Make changes to the language assistance plan based on feedback received	x	
5.5	Consider new language assistance needs when expanding service Identify service changes affecting areas with high concentrations of LEP individuals and develop mitigation strategies		х

Responsibility for Implementing the Language Assistance Plan

The Title VI Program Administrator will be responsible for overseeing the implementation of this plan and assigning tasks as appropriate.

PVTA's Title VI Program Administrator is: George L. Sparks, Administrator PVTA 2120 Foothill Blvd, Ste. 116 La Verne, CA 91750 909-596-7664 Email - glspvta@gmail.com

Language Service Provision

Interpretation Services

- 1. PVTA has in place a contract with Language Line Personal Interpreter to provide simultaneous interpretation for callers and for customers in service with whom staff can't communicate.
- 2. When a customer directly calls the Language Line phone number, Language Line will connect with PVTA and translate the callers and PVTA's conversation.
- 3. When a customer calls PVTA directly and with whom a staff member can't communicate, staff will connect with Language Line to translate. This step will be followed for customers at PVTA's headquarters and other service centers. If there isn't a staff member available who can translate, Language Line services will be used.
- 4. Simultaneous interpretation at public events will be determined on a caseby-case basis by examining several factors, such as:

- the type and size of event;
- the availability of a PVTA staff member to interpret;
- the availability of a staff member of a host organization to interpret, etc.

For small outreach events, proactive outreach, smaller travel training and transit awareness events, bilingual staff members will assist with translation where appropriate and feasible. For large outreach events, where it is appropriate and necessary to do so, PVTA will hire an interpreter through a local or regional service.

Translation of Vital Documents

1. Based on the results of the four factor analysis, the following vital documents will be translated into Spanish and Chinese the LEP languages within PVTA's service area, in accordance with the timeline established in the previous pages:

Vital Documents - Stage 1

- 1) Title VI Program
 - Title VI Notice to the Public
 - Complaint Form
 - Complaint Procedures
- 2) PVTA Rider Information
 - Brochure
- 3) Get About Application

Vital Documents - Stage 2

1. Signage advertising PVTA's language assistance program, particularly Language Line number and translated information on its website.

2. Going forward, the extent of PVTA's ability and obligation to translate written documents will be determined on a case-by-case basis, by looking at all elements presented in the Four Factor Analysis.

PVTA's Website

- 1. All translated vital documents are posted on PVTA's website on their respective pages.
- 2. PVTA is reviewing options and will pursue the most appropriate and feasible option for translating its website. Elements included in the Four Factor Analysis will be used in recommending a best course.

Outreach

- 1. To ensure that LEP individuals are aware of PVTA's language assistance measures PVTA will develop simple signage that advertise
 - PVTA's Language Line number offering free-of-charge interpretation services
 - Information is available in other languages on the website.
- 2. Language assistance signage is posted at the following locations:
 - PVTA offices
 - PVTA vehicles
 - Community centers and/or popular destinations identified during the Four Factor Analysis and ongoing outreach
- 3. PVTA outreach staff will continue developing relationships with organizations that serve LEP individuals and developing strategies to spread awareness of PVTA's language assistance services.

6. Monitoring, Evaluating, and Updating the LAP

1. A thorough review of this Language Assistance Plan will be undertaken

every three years concurrent with updating and submitting the PVTA Title VI Program. At that time, the LEP population will be reassessed, to ensure all significant LEP languages are included in PVTA's language assistance efforts. The following reoccurring reporting and evaluation measures will be used to update the Language Assistance Plan:

- 2. PVTA will regularly assess the effectiveness of how PVTA communicates with LEP individuals by:
 - Including questions about language assistance and information needs on any community surveys
 - Conversations with Key contacts that work with LEPs
 - Ad-hoc outreach with LEP groups
- 3. PVTA will track its language assistance efforts, including:
 - Reporting front-line staff's interactions with LEP
 - Language Line reports

7. Staff Training

PVTA's Title VI Program Administrator will develop training guidelines for PVTA and contractor personnel with training being conducted until all pertinent staff has received. This training will include the following:

- How to respond to LEP callers
- How to respond to correspondence from LEPs
- How to respond to LEPs in person
- How to document LEP needs
- How to respond to civil rights complaints

The Program Administrator will also develop a schedule for reoccurring training and a process for training new hires, as well as training opportunities for PVTA's ambassadors.

Membership of Non-Elected Committees and Councils

Pomona Valley Transportation Authority does not have a non-elected transit related advisory council at this time.

Title VI Equity Analysis

Pomona Valley Transportation Authority did not use any federal funds for the construction of a facility; therefore, we did not conduct a Title VI Equity Analysis.

Board of Directors Approval of Pomona Valley Transportation

POMONA VALLEY TRANSPORTATION AUTHORITY BOARD OF DIRECTORS AUTHORIZING THE TITLE VI COMPLIANCE PLAN FOR THE AGENCY.

Resolution No. 20-02

WHEREAS, Pomona Valley Transportation Authority 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 Pomona Valley Transportation Authority as follows:

- 1. The Administrator is authorized to implement the components of the plan in order to meet Federal requirements.
- 2. The 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 Pomona Valley Transportation Authority, State of California, on this 10th day of June, 2020.

Chair of the Board