

# 2017

## TULARE COUNTY Tulare County Area Transit/TCAT Title VI Program



Tulare County Area Transit /TCAT  
5961 South Mooney Boulevard  
Visalia, CA 93277

**TULARE COUNTY**  
**TULARE COUNTY AREA TRANSIT/TCAT**  
**TITLE VI PROGRAM**  
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# **TULARE COUNTY TULARE COUNTY AREA TRANSIT/TCAT TITLE VI PROGRAM**

**Reference:** *FTA Circular 4702.1B Title VI Requirements and Guidelines for Federal Transit Administration (FTA) Recipients (October 1, 2012).*

## **INTRODUCTION**

The purpose of this Title VI Program is to establish guidelines to effectively monitor and ensure that Tulare County's TCAT services are in compliance with FTA Title VI requirements.

Title VI states 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." The FTA is required to ensure that federally-supported transit services and related benefits are provided consistent with Title VI. The Title VI Report requires an update every three years.

Tulare County will ensure that its programs, policies, and activities comply with Department of Transportation's (DOT) Title VI Regulations (49 CFR Part 21) and with Limited English Proficient (LEP) Persons requirements (70 FR 74087, December 14, 2005). The County is committed to creating and maintaining a public transportation system that is free of all forms of discrimination. The County will take necessary preventive corrective and disciplinary actions to stem behavior that violates this policy or the rights and privileges it is designed to protect. FTA requires recipients to document compliance with DOT Title VI regulations by submitting a Title VI Program to their FTA regional civil rights officer once every three years.

### **Tulare County Title VI Policy Statement**

*Tulare County is committed to ensuring that no person is excluded from participation in or denied the benefits of its services on the basis of race, color, or national origin, as provided by Title VI of the Civil Rights Act of 1964, as amended.*

The County's objectives are to:

- Ensure that the level and quality of transportation service is provided without regard to race, color or national origin.

- Identify and address, as appropriate, disproportionately high and adverse human health and environmental effects, including social and economic effects of programs and activities on minority populations and low-income populations.
- Promote the full and fair participation of all affected populations in transportation decision making.
- Prevent the denial, reduction or delay in benefits related to programs and activities that benefit minority populations or low-income populations.
- Ensure meaningful access to programs and activities by persons with limited English proficiency (LEP).

## **TITLE VI REQUIREMENTS**

1. **Requirement to Notify Beneficiaries of Protection under Title VI.** In order to comply with 49 CFR, Section 21.9(d), the County shall provide information to the public regarding the County's obligations under DOT's Title VI regulations and apprise members of the public of the protections against discrimination afforded to them by Title VI.

### **Title VI Notice to the Public**

Tulare County informs members of the public of its Title VI protection rights by posting of a Title VI Notice to the Public and providing bilingual complaint procedures, as shown in Exhibits A and B. The County also provides a bilingual complaint form and posts a Title VI bilingual notice for public viewing at the Downtown Visalia Transit Center, as shown in Exhibit C.

**EXHIBIT A  
NOTICE TO THE PUBLIC - ENGLISH**

**TULARE COUNTY  
Tulare County Area Transit/TCAT  
Title VI Notice & Complaint Process**

Tulare County is committed to ensuring that no person is excluded from participation in or denied the benefits of its services on the basis of race, color, or national origin, as provided by Title VI of the Civil Rights Act of 1964. Any person who believes that he or she has been subjected to discrimination under Title VI on the basis of race, color or national origin may file a Title VI complaint with the County.

**Complaints may be filed with the County in writing and may be addressed to:**

Ms. Teresa Ortega  
Title VI Compliance Coordinator  
Tulare County RMA  
5961 S. Mooney Blvd.  
Visalia, CA 93277

A copy of the Title VI Complaint Form (in English or Spanish) and additional information may be obtained from the County's web site at "[www.tularecounty.ca.gov](http://www.tularecounty.ca.gov)" (under "Quick Links – Transportation – Transit") or by calling 559-624-7000. The County will provide appropriate assistance to complainants who are limited in their ability to communicate in English.

**EXHIBIT B  
NOTICE TO THE PUBLIC - SPANISH**

**CONDADO DE TULARE  
TULARE COUNTY AREA TRANSIT/TCAT  
Título VI Noticia y Proceso de Quejas**

El Condado de Tulare, se compromete a garantizar que ninguna persona sea excluida de participar o de negar los beneficios de servicios basado por raza, color, linaje u origen nacional, según lo dispuesto en el Título VI de la Ley de Derechos Civiles de 1964. Cualquier persona que cree que él o ella ha sido objeto de discriminación en virtud del Título VI basado por raza, color u origen nacional puede presentar una queja del Título VI con el Condado.

**Las quejas pueden ser presentadas en el Condado por escrito y pueden ser dirigidas a:**

Sra. Teresa Ortega  
Coordinadora de Conformidad Titulo VI  
Condado de Tulare  
5961 S. Mooney Boulevard  
Visalia, CA 93277

Una copia del Título VI Formulario de Queja (en Inglés o Español) y la información adicional se puede obtener desde el sitio web del Condado en "[www.tularecounty.ca.gov](http://www.tularecounty.ca.gov)" (en "Quick Links - Departamentos - Tránsito") o llamando al 559-624-7000. El Condado proveerá asistencia apropiada para los denunciantes que sean limitados en su capacidad de comunicarse en inglés.

2. **Requirement to Post Notice of Title VI.** The County is required to post a public notice of the protections against discrimination afforded by Title VI.

### **Tulare County Locations Where Title VI Notice is Posted**

The following is a list of locations where transit-related bilingual Title VI Public Notices are posted:

- Tulare County Web Site: [www.tularecounty.ca.gov/rma](http://www.tularecounty.ca.gov/rma)
- Downtown Visalia Transit Center  
Transit Administrations Office  
425 E. Oak Ave., Suite 101  
Visalia, CA 93291
- Tulare County RMA Office  
5961 S. Mooney Boulevard  
Visalia, CA 93277
- Visalia Transit Maintenance & Operations Center  
525 N. Cain Street  
Visalia, CA 93292

Other transit agencies coordinate services with TCAT and post required Title VI at their respective transit centers, including:

- City of Porterville
- City of Tulare
- City of Dinuba
- City of Woodlake
- City of Delano

3. **Requirement to Develop Title VI Complaint Procedures and Complaint Form.**

The County is required to develop procedures for investigating and tracking Title VI complaints filed against the County and to make these procedures for filing a complaint available to the general public.

### **Tulare County Title VI Complaint Procedures**

Submission of Complaint: If a customer believes he/she has received discriminatory treatment by Tulare County's transit system on the basis of race, color or national origin, the customer will have the right to file a complaint with the Transit Title VI Compliance Coordinator.

The complaint shall be in writing and signed by the complainant(s). Written complaints shall include:



- Date of the alleged discrimination.
- Date when the complainant(s) became aware of the alleged act of discrimination; or
- Date that conduct was discontinued or the latest instance of conduct.
- Detailed description of the issues, including names and job titles of those individuals perceived as parties in the complaint.

The complaint can be mailed to:

Tulare County Resource Management Agency  
TCAT Title VI Compliance Coordinator  
5961 S. Mooney Boulevard  
Visalia, CA 93277

The complaint can be phoned to:

559-624-7180 or 559-624-7000

The complaint may be made in person at:

MV Transportation  
525 North Cain Street  
Visalia, CA 93292

Tulare County Resource Management Agency  
TCAT Title VI Compliance Coordinator  
5961 S. Mooney Boulevard  
Visalia, CA 93277

#### Investigation of Complaints

Upon receipt of the complaint, the Compliance Coordinator will review it to determine if TCAT has jurisdiction. As appropriate, the complaint will be investigated and a determination made. Formal investigation will be confidential and will include, but is not limited to, details of the specific incident, frequency and dates of occurrences and names of any witnesses. Claimant will be notified in writing of the resolution.

The complainant has ten business days from the date of the letter to send requested information to the Compliance Coordinator. If the Coordinator is not contacted by the complainant or does not receive the additional information within ten business days, Tulare County can administratively close the case.

Upon completion of the review, the Transit Manager shall make a recommendation regarding the merit of the complaint, whether remedial actions are available to provide redress, and whether improvements to the County's Title VI process are needed.

A case can be administratively closed if the complainant no longer wishes to pursue their case. Following the investigation, the Title VI Compliance Coordinator will issue one of two letters to the complainant: (1) a closure letter, or (2) a letter of finding. 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.

- Appeals Process

If the complainant is not satisfied with the resolution, he or she may appeal it to:

Tulare County Resource Management Agency  
RMA Director  
5961 S. Mooney Boulevard  
Visalia, CA 93277

- Submission of Complaint to the Department of Transportation

The complainant may also file a complaint directly to:

FTA Office of Civil Rights  
Title VI Program Coordinator  
East Building, 5<sup>th</sup> Floor – TCR, 1200  
New Jersey Avenue, S.E.  
Washington, D.C. 20590.

In accordance with FTA Circular 4702.1B, Chapter 9, Complaints, such a complaint must be filed within 180 calendar days after the date of the alleged discrimination.

**EXHIBIT C  
TULARE COUNTY AREA TRANSIT  
TITLE VI 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?  
 Large Print       Audio Tape       TDD       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):  
 Race                       Color                       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.

**Section IV:**

14. Have you previously filed a Title VI complaint with Tulare County?  
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 #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:

TCAT Title VI Compliance Coordinator  
Tulare County Resource Management Agency  
5961 S. Mooney Boulevard  
Visalia, CA 93277

**EXHIBIT D**  
**TULARE COUNTY AREA TRANSIT**  
**TITULO VI FORMULARIO DE QUEJA**

**Sección I: (Favor de escribir en forma legible)**

1. Nombre: \_\_\_\_\_
2. Dirección: \_\_\_\_\_
3. Teléfono: \_\_\_\_\_ 3.a. Teléfono Secundario (Opcional): \_\_\_\_\_
4. Correo Electrónico: \_\_\_\_\_
5. Requisitos en formato accesible?  
 Letra Grande     Cinta de Audio     TDD     Otra Forma

**Sección II:**

7. Esta presentando esta queja en su propio nombre?    Si\* \_\_\_\_\_ No \_\_\_\_\_  
\*Si contesto "si" al #6, baje a la Sección III.
8. Si contesto "no" al #6, cual es el nombre de la persona por cual usted esta representando la queja? Nombre: \_\_\_\_\_
9. Cual es la relación con este individuo: \_\_\_\_\_  
Favor de explicar porque usted esta representando a una tercera persona: \_\_\_\_\_  
\_\_\_\_\_
10. Favor de confirmar que usted obtuvo permiso de someter una queja con la persona afectada.    Si \_\_\_\_\_ No \_\_\_\_\_

**Sección III:**

11. Yo creo que la discriminación por la que pase fue basada por (Marque la que pertenezca):  
 Raza     Color     Origen Nacional
12. Fecha de la presunta discriminación: (mm/dd/aaaa) \_\_\_\_\_
13. Explique lo mas claro posible lo que paso y porque cree que fue discriminado. Describe todas las personas que estuvieron involucradas. Incluya el nombre y la información de contacto de la persona(s) que lo discrimino (si se conoce), así como los nombres y la información de los testigos en contacto. Si se necesita mas espacio, por favor use el reverso de este formulario.

**Sección IV:**

14. Ha presentado anteriormente una queja del Título VI con el Condado de Tulare?

Si \_\_\_\_\_ No \_\_\_\_\_

**Sección V:**

15. Ha presentado esta queja con cualquier otra agencia federal, estatal o local, o ante cualquier tribunal federal o estatal?

Si \_\_\_\_\_ No \_\_\_\_\_

Si contesto si, marque el que aplique:

[ ] Agencia Federal \_\_\_\_\_ [ ] Agencia Estatal \_\_\_\_\_

[ ] Corte Federal \_\_\_\_\_ [ ] Agencia Local \_\_\_\_\_

[ ] Corte Estatal \_\_\_\_\_

16. Si contesto “sí” al #15, favor de proveer información de una persona cual usted tubo contacto con la agencia/corte donde se sometió la queja.

Nombre: \_\_\_\_\_

Título: \_\_\_\_\_

Agencia: \_\_\_\_\_

Dirección: \_\_\_\_\_

Teléfono: \_\_\_\_\_ Email: \_\_\_\_\_

**Sección VI:**

Nombre de la Agencia de Transito cual se inicio su queja: \_\_\_\_\_

Persona de Contacto: \_\_\_\_\_

Teléfono: \_\_\_\_\_

Usted puede conectar cualquier material escrito u otra información que cree que es relevante para su queja.

Firma y fecha es requerida para someter esta forma:

Firma \_\_\_\_\_ Fecha \_\_\_\_\_

Favor de someter esta forma en persona o por correo a la siguiente dirección:

TCAT Título VI Coordinador de Conformidad  
Tulare County Resource Management Agency  
5961 S. Mooney Boulevard  
Visalia, CA 93277

4. **Requirement to Record and Report Transit-Related Title VI Investigations, Complaints, and Lawsuits.** The County is required to prepare and maintain a list of investigations, complaints, or lawsuits that pertain to allegations of discrimination on the basis of race, color, and/or national origin in transit-related activities and programs and that pertain to the entity submitting the report, not necessarily the larger agency or department of which the entity is a part.

Tulare County has not been involved in any transit-related Title VI investigations, complaints or lawsuits. Tulare County's Title VI Transit Compliance Coordinator will maintain a list of Title VI investigations, complaints, and lawsuits and include a summary and description of actions taken by the County, as required by the Title VI regulations. The list will include the date that the investigation, lawsuit, or complaint was filed; a summary of the allegations(s); the status of the investigation; lawsuit, or complaint; and actions taken in response, or final findings related to the investigation, lawsuit, or complaint. The list will be included in the County's Title VI submittal to FTA every three years.

5. **Promoting Inclusive Public Participation and Language Assistance Plan.** The County is required to develop a Public Participation Plan that includes an outreach plan to engage minority and limited English proficient populations, as well as a summary of outreach efforts made since the last Title VI Program submission.

## **EXHIBIT E TULARE COUNTY AREA TRANSIT PUBLIC PARTICIPATION PLAN**

### **Public Outreach Activities**

TCAT web site posts fixed-route schedules and Dial-A-Ride rider information. The County's web site provides material in English and Spanish. The County also provides easy access to bilingual (English and Spanish) administrative staff and drivers at the County's third-party contractor administrative offices and the Visalia Transit Center during operating hours to answer questions during their regular shift schedules for TCAT LEP passengers.

TCAT reaches out to the community directly through meetings with agency and community staff and their clients, as needed. Information regarding the County's transit services is disseminated at these meetings, including schedules and appropriate fliers. Schedules also are made available at a variety of locations throughout the community and on the TCAT fixed-route and Dial-A-Ride systems.

### **Public Meetings**

TCAT actively participates in the Tulare County Association of Governments (TCAG) Social Services Transportation Advisory Committee (SSTAC) quarterly meetings that are open to the general public. The SSTAC is composed of diverse public citizens of the community and is open to taking public testimony prior to initiation of each meeting.

TCAT also collaborates with the TCAG, the Metropolitan Planning Organization (MPO), in its annual Unmet Transit Needs process. The Unmet Transit Needs hearings are accessible to the general public, offer bilingual translation, and are consistent with TCAG's comprehensive Public Participation Plan and process that ensures meaningful access to LEP throughout the Tulare County region.

TCAT staff also participates in the development of the TCAG "Public Participation Plan." A series of meetings are conducted with participants from throughout the community. Recommendations to maximize community involvement are reflected in this plan and adopted by the TCAG Board.

### **General Awareness Surveys**

TCAT conducts bilingual (English and Spanish) on-board rider and general awareness surveys in conjunction with updates to the Short-Range Transit Plan. These personal one-on-one surveys allow riders to convey any concerns or comments they have regarding TCAT services.



## **Bilingual Outreach**

TCAT provides Spanish-speaking clients with bilingual information on public transit services. Staff assistance is utilized in outreach programs and offered for programs and public meetings, such as the Tulare County Fair, Office of Education sponsored programs, and the Farmworker Women's Conference.

## **Telephone Access**

Transit staff is available to answer questions in Spanish during normal working hours. The County's Green Line, a general public telephone service, also provides bilingual information on transit services for all systems throughout Tulare County. The Green Line (1-877-404-6473) is offered weekdays from 7:00 a.m. to 6:00 p.m. and Saturdays from 8:30 a.m. to 5:30 p.m.

## **Participation in Community Activities**

TCAT engages in community activities that promote its transit services. These activities include the annual Seniors Day event in May sponsored by the Health and Human Services Agency and the Tulare County Area Agency on Aging where a broad cross-section of the community can access available transit information, including schedules, brochures and fliers.

## **Summary of Outreach Efforts Made**

TCAT's Transit Manager, contract Transit Manager and dispatchers regularly participate in recurring and ad hoc outreach.

Outreach locations and activities include:

- Senior Centers – TCAT provides transit information to Tulare County Senior Centers to provide regular advertising to their consumers and participation in the annual Seniors Day event.
- Community Centers – TCAT hosts workshops at community centers and as invited. Tulare County Community Centers also have TCAT information and regularly advertise to their consumers.
- TCAG Annual Unmet Transit Needs Process – TCAG is required by statute to conduct a formal hearing process that solicits information about transit needs. This allows TCAG to make a determination as to whether there are unmet transit needs and whether these transit needs can be reasonably met. The hearing processes are conducted only in those parts of the County where State Transportation Development Act, Local Transportation Funds, are allocated only in part to public transportation.

TCAT actively participates in the unmet transit needs public hearings conducted by the TCAG Board. This process involves inviting testimony through a wide array of mailing lists and agency contacts, including TCAT's outreach lists, receiving testimony either in-person at the hearing and by mail or by email where a name and local address are provided.

Comments pertaining to TCAT every year are reviewed and responded to appropriately in close coordination with the TCAG Social Services Transportation Advisory Council (SSTAC), a committee composed of diverse representatives from throughout the community.

- Updates to the Public Transit Human Services Transportation Coordination Plan for Tulare County – As part of TCAG's Coordinated Plan Update process, TCAT staff actively participates in transit workshops. Members of the public as well as human and social service agency representatives are invited to attend to share transit needs and discuss projects that may address these needs.
- College of the Sequoias – TCAT participates in the Student Transit Pass Program and associated advertising and outreach efforts to students.

6. **Requirement to Provide Meaningful Access to LEP Persons.** The County must have a language assistance plan for providing language assistance to persons with limited English proficiency (LEP). Title VI and its implementing regulations require that FTA recipients take responsible steps to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are LEP.

**EXHIBIT F**  
**TULARE COUNTY AREA TRANSIT**  
**Limited English Proficiency (LEP) Plan**

**Introduction**

This Limited English Proficiency (LEP) Plan has been prepared to address Tulare County Transit Division's responsibilities 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 4702.1A dated May 13, 2007, which state 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, including Tulare County departments receiving federal grant funds.

**Background**

Tulare County Transit Division administers TCAT fixed-route and Dial-A-Ride services that are operated by a third-party contractor, MV Transportation. The Tulare County Board of Supervisors is the policymaking body for the system. Tulare County transit services consist of a fixed route service, TCAT, and a Dial-a-Ride service (DAR). TCAT has developed this LEP Plan to help identify reasonable steps for providing language assistance to persons with limited English proficiency who wish to access services provided by TCAT and Dial-A-Ride. As defined by Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write, or understand English.

This plan outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, and how to notify LEP persons that assistance is available.

In order to prepare this plan, TCAT undertook the U.S. Department of Transportation (U.S. DOT four-factor LEP analysis which considers the following factors:

1. The number or proportion of LEP persons in the service area who may be served or are likely to encounter Tulare County transit programs, activities, or services.
2. The frequency with which LEP persons come in contact with TCAT transit programs, activities, or services.

3. The nature and importance of programs, activities, or services provided by TCAT to the LEP population.
4. The interpretation services available to TCAT and overall cost to provide LEP assistance.

A summary of the results of TCAT’s four-factor analysis is reflected in the following section.

**Meaningful Access: Four-Factor Analysis**

1. The number or proportion of LEP persons in the service area who may be served or are likely to encounter TCAT programs, activities, or services.

As shown in the table below, based on the “U.S. Census Bureau 2015 American Community Survey 1-Year Estimates,” an estimated 12% of Tulare County “Spanish” households are limited English-speaking households while 1% of “Other” households are limited English-speaking households. Approximately 48% speak English only

Tulare County American Community Survey (2015)	Estimate	% of Total Households	% of Total Limited English/Not Limited English-Speaking Households
Total:	134,801	100%	100%
English only	<b>65,222</b>	48%	48%
Spanish:	<b>62,511</b>	47%	
Limited English speaking household	15,874		12%
Not a limited English speaking household	46,637		35%
Other languages:	<b>7,068</b>	5%	
Limited English speaking household	1,487		1%
Not a limited English speaking household	5,581		4%

TCAT staff reviewed the 2007-2011 U.S. Census, American Community Survey, and determined that of 187,770 persons surveyed, 48% of the population in Tulare County speak a language other than English. Of those, 89,365 persons or 48% have limited English proficiency; that is, they speak English “less than well.” This is approximately 23% of the population. Of those persons with limited English proficiency, 92% speak Spanish, 6% speak Asian or other Pacific Islander languages, and 2% speak other languages. Historically, TCAT ridership surveys have shown that approximately 25% of survey participants elected to use the Spanish-language survey form.

2. The frequency with which LEP come in contact with TCAT services.

TCAT staff reviewed the frequency with which TCAT and third-party contract management staff, dispatchers, and bus drivers could have contact with LEP persons. This includes evaluating telephone inquiries, office visits, and personal one-on-one field contacts. To date, TCAT has had no requests for interpreters and no requests for translated program documents. TCAT drivers are in regular contact with LEP persons on TCAT routes, of which the majority is Hispanic; and all TCAT schedules are available in Spanish. TCAT dispatchers have Spanish proficiency or access to Spanish-speaking staff at all times.

3. The nature and importance of programs, activities, or services provided by TCAT transit services to the LEP population.

Demographic and survey data show that Spanish speakers are most likely to ride TCAT and that a majority are over 60 years of age and dependent on public transportation. TCAT's outreach efforts must therefore ensure that schedules and other key documents are translated and user-friendly, and that bilingual staff are readily available.

4. The resources available to TCAT and overall cost to provide LEP assistance.

TCAT staff has access to a variety of services and resources that can help in outreaching and providing LEP assistance at low or no cost. Community-based resources include:

- TCAG Transit Guide
- Tulare County Green Line
- Tulare County Senior Centers
- Visalia Transit Downtown Transit Center
- Tulare County Association of Governments (TCAG) Social Services Transportation Advisory Council (SSTAC)
- TCAG Board Unmet Transit Needs Process
- TCAG Public Participation Committee
- Tulare County Social Services Department
- ABLE Industries
- Translation Services

The above community resources will be used on a regular basis to assist in identifying needs of the County's LEP population. They will also serve as a means to widely disseminate bilingual transit service information and announcements and to notify the LEP population of planned workshops and outreach efforts.

Based on the four-factor analysis, Tulare County will develop its LEP Plan as outlined in the following section.

## Identification of LEP Population

TCAT has developed several possible ways to assist in identifying LEP populations within the County, including:

1. Examine records to see if requests for language assistance have been received in the past, either at meetings or over the phone, to determine whether language assistance might be needed at future events or meetings.
2. Have a staff person greet participants as they arrive to TCAT-sponsored events. By informally engaging participants in conversation it is possible to gauge each attendee's ability to speak and understand English.
3. At TCAT transit meetings and events, develop identification cards that indicate primary language spoken, as appropriate. This will assist TCAT in identifying language assistance needs for future events and meetings.
4. Survey vehicle operators and other front-line staff, like dispatchers, Dial-A-Ride schedulers, and service development planners on their experience concerning any contacts with LEP persons.
5. Network with local human services organizations (such as Social Services and Public Health) to assist in identifying LEP groups and individuals most in need of LEP assistance and to further facilitate dissemination of information about TCAT's transit services.

## Language Assistance Measures

There are plans for a number of language assistance options available to LEP persons, including both oral and written language services. There are also various ways in which TCAT staff can respond to LEP persons, whether in person, by telephone, or in writing.

- Provide a bilingual Community Outreach Coordinator at community events and public hearings.
- Placement of statements in notices and publications that interpreter services are available for these meetings.
- Survey bus drivers and other front-line staff, like dispatchers, Dial-A-Ride schedulers, and service development planners on their experience concerning any contacts with LEP persons during the previous year.
- Post Tulare County Title VI Policy and LEP plan on Tulare County website, [www.tularecounty.ca.gov](http://www.tularecounty.ca.gov).
- When an interpreter is needed, for a language other than Spanish, in person or on the telephone, staff will attempt to access language assistance services from a professional translation service or qualified community volunteers.

## **Outreach Techniques**

When staff prepares a document or schedules a meeting, for which the target audience is expected to include LEP individuals, documents, meeting notices, flyers, and agendas will be printed in an alternative language based on the known LEP population. Interpreters will be available as needed. TCAT currently uses a variety of outreach approaches, as described below.

### Public Outreach Activities

Tulare County web site posts TCAT fixed-route and Dial-A-Ride schedules. The County's web site provides material in both English and Spanish. The County also provides easy access to bilingual (English and Spanish) administrative staff and drivers at the County's Downtown Transit Center during operating hours to answer questions during their regular shift schedules for those LEP passengers who the County's bus system.

TCAT reaches out to the community directly through meetings with agency and community staff and their clients, as needed. Information regarding the County's transit services is disseminated at these meetings, including schedules and appropriate fliers. Schedules also are made available at a variety of locations throughout the community and on the TCAT and Dial-A-Ride systems.

### Public Meetings

TCAT conducts and participates in meetings that are open to the general public. TCAT collaborates with the Tulare County Association of Governments (TCAG), the Metropolitan Planning Organization (MPO), in its Unmet Transit Needs process. The Unmet Transit Needs hearings are accessible to the general public, offer bilingual translation, and are consistent with TCAG's comprehensive Public Participation Plan and process that ensures meaningful access to LEP throughout the Tulare County region. The TCAG public hearing is accessible by public transit services.

TCAT transit staff also participates in the development of the TCAG "Public Participation Plan." A series of meetings are conducted with participants from throughout the community. Recommendations to maximize community involvement are reflected in this plan and adopted by the TCAG Board.

### Participation in Community Activities

TCAT engages in community activities that promote its transit services. These activities and sites include:

- Tulare County Senior Centers



- Seniors Day Event
- Community Centers
- TCAG Annual Unmet Transit Needs Process
- Participation in updates to the Public Transit Human Services Transportation Coordination Plan for Tulare County
- College of the Sequoias Student Transit Pass Program outreach
- Tulare County Fair

### **Assurances**

Tulare County transit services will ensure that no person, on the grounds of race, color, national origin, as provided by Title VI of the Civil Rights Act of 1964, will be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination. Further, TCAT will notify the public of protections against discrimination afforded them by Title VI Regulations and will take preventive corrective and disciplinary action necessary to stem behavior that violates the rights and privileges the regulations are designed to protect.

TCAT will post information on its web site and ensure that it reflects up to date information consistent with the requirements of 49 CFR Section 21.9(d).

### **Monitoring and Updating the LEP Plan**

TCAT will update the LEP as required by U.S. DOT. At a minimum, the plan will be reviewed and updated when more data from the 2010 U.S. Census is available, or when it is clear that higher concentrations of LEP individuals are present in Tulare County transit services area. Updates will include the following:

### **Documentation of LEP Personal Contacts**

- How the needs of LEP persons have been addressed.
- Determination of the current LEP population in the service area.
- Determination as to whether the need for translation services has changed.
- Determine whether local language assistance programs have been effective and sufficient to meet the need.
- Determine whether TCAT financial resources are sufficient to fund language assistance resources needed.
- Determine whether TCAT has fully complied with the goals of this LEP Plan.
- Determine whether complaints have been received concerning TCAT transit services' failure to meet the needs of LEP individuals.

### **Availability of Title VI Plans and Procedures**

Tulare County LEP Plan and the Title VI Procedures are included in Tulare County's website at [www.tularecounty.ca.gov](http://www.tularecounty.ca.gov). Any person or agency with internet access will be



able to access and download the plan from Tulare County website. Alternatively, any person or agency may request a copy of the plan via telephone, fax, mail, or in person and shall be provided a copy of the plan at no cost. LEP individuals may request copies of the in translation which Tulare County will provide, if feasible.

Questions or comments regarding the LEP Plan may be submitted to Tulare County Resources Management Agency, Transit Division, Title VI Compliance Coordinator or Transit Manager:

Tulare County Resource Management Agency  
TCAT Title VI Compliance Coordinator  
5961 S. Mooney Boulevard  
Visalia, CA 93277  
Phone: (559) 624-7000  
Fax: (559) 740-4448

7. **Minority Representation on Planning and Advisory Bodies.** The County must describe efforts to encourage participation of minorities on committees, board, councils, or other bodies. County must provide a table of transit-related, non-elected planning boards, advisory councils or committees, or similar bodies, the membership of which is selected by the County, and must indicate the racial breakdown of the membership of such committees or councils.

TCAT has no planning and/or advisory committees of non-elected committees.

8. **Requirement to Develop System-Wide Standards and Policies.** FTA requires all fixed-route transit providers to develop quantitative service standards and policies for their fixed-route service. Individual public transportation providers may set standards that best reflect their local environment.

Tulare County has developed service standards and policies for its fixed-route system, TCAT, consistent with Title VI requirements. The standards are included in Exhibit G and include (a) vehicle load; (b) vehicle headways; (c) on-time performance; and (d) service availability.

**EXHIBIT G  
TULARE COUNTY  
SYSTEM-WIDE SERVICE STANDARDS  
TCAT FIXED-ROUTE SYSTEM**

**Background**

FTA requires all fixed-route transit providers of public transportation to develop quantitative standards for the following indicators. Individual public transportation providers may establish their own standards.

**Definitions**

- Vehicle load for each mode: Generally expressed as the ratio of passengers to the number of seats on a vehicle, relative to the vehicle's maximum load point. (For example, on a 40-seat bus, a vehicle load of 1.3 means all seats are filled and there are approximately 12 standees. Transit providers can specify vehicle loads for peak versus off-peak times, and for different modes of transit.)
- Vehicle headways for each mode: The amount of time between two vehicles traveling in the same direction on a given line or combination of lines.
- On-time performance for each mode: A measure of runs completed as schedules.
- Service availability for each mode: A general measure of the distribution of routes within an agency's service area.

**Vehicle Load Standards**

Vehicle load thresholds will be used to measure service effectiveness or to determine remediation. The average of all loads during peak operating period should not exceed 1.25 (25% standees) and 1.0 (0% standees) during off-peak periods on the fixed-route system.

Vehicle Load Standard	Vehicle Load Standard	Standees
Peak Period	1.25	25%
Off-Peak Period	1.0	0%

**Vehicle Headway Standards**

Vehicle headway is the time interval between vehicles on a route that allows passengers to gauge how long they will have to wait for the next vehicle. Similar to

vehicle load, vehicle headway varies by mode and time of day. Vehicle headway will be determined by ridership and available resources to operate service.

Scheduling involves the consideration of a number of factors, including ridership, productivity, transit and pedestrian-friendly streets, density of transit-dependent population and activities, relationship to the Regional Transportation Plan, relationship to major transportation developments, land use connectivity, and transportation demand management.

### **On-Time Performance Standards**

A vehicle is considered on time if it departs a scheduled timepoint no more than one minute early and no more than eight minutes late. Tulare County's on-time performance objective is 90% or greater. Tulare County continuously monitors on-time performance and system results are published and posted as part of monthly performance reports covering all aspects of operations.

### **Service Availability Standards**

Tulare County's service availability standards will strive to ensure that 75% of residents in the service area are within three-quarters of a mile of bus service. Like vehicle headways, the ability to provide increased service levels will be determined by ridership and available resources to operate service.

**EXHIBIT H  
TULARE COUNTY  
SYSTEM-WIDE SERVICE POLICIES  
TCAT FIXED-ROUTE SYSTEM**

**Background**

FTA requires that all providers of fixed-route public transportation develop qualitative policies for the following procedures:

- Vehicle Assignment
- Transit Amenities

**Policies**

Vehicle Assignment Policy

TCAT will endeavor to deploy vehicle(s) assigned to each of the TCAT fixed-routes such that the average age of the fleet serving each route does not exceed over seven years beyond the FTA useful life standard of the assigned vehicle type.

All vehicles will be equipped with air conditioning. The capacity of vehicles will be matched to the operating characteristics of the route.

Transit Amenities Policy

Installation of transit amenities along bus routes will be based on the number of passenger boardings at stops along those routes.