



## 2020 Title VI Program

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Community • Accessibility • Service • Projects • Activities • Public Engagement • Safety  
Language English Proficient • Environmental Justice • Effective Communication  
Sustainability • Excellence • Innovation • Continuous Improvement

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## Introduction

We envision a continuously improving transit system for our community by providing excellent transit programs that are innovative, sustainable, and affordable.

The [City of Turlock](#) established its non-profit public transportation system on August 25, 1975 with Dial-A-Ride (DAR), which provided demand-response transit needs to both Turlock and Denair. On November 23, 1998 the City began its fixed route transit system, Bus Line Service of Turlock (BLaST), with two routes and eventually expanding to four routes servicing Turlock. On January 2, 2017 Turlock Transit Lines was rebranded under the name: Turlock Transit.

The rebranding came with a totally redesigned six-route system accompanying our DAR service to better meet the needs of our passengers. We highly value the input provided by our community members and we are determined to develop programs that satisfy the transit service needs for most, if not all, of our area's transit riders. Through a series of public engagement activities aimed at connecting with our stakeholders, we gain insight about the transit related needs directly from those who use transit and are affected by the program, services, and activities that we provide.

By working together with community members, leaders, and decision makers the City of Turlock will continue to improve the local public transit system to meet the dynamic needs of our community, in addition to ensuring that our transit programs are consistently compliant with DOT and FTA requirements. We have seen our ridership increase steadily in recent years, from 111,040 fixed-route passengers in fiscal year 2015-16 to the most recent pre-pandemic count of 185,410 passengers in fiscal year 2019-20.

Moving forward, we are committed to providing high-quality transit services with excellence in reliability of services and staffing, innovation with new technology and efficient business approaches, and a sustainable public transportation system that reduces traffic congestion and improves air quality leading to a brighter future for California's Central Valley.

# City Resolution

## BEFORE THE CITY COUNCIL OF THE CITY OF TURLOCK

IN THE MATTER OF APPROVING AN } RESOLUTION NO. 2020-\_\_\_\_\_  
UPDATE TO THE CITY OF TURLOCK }  
TITLE VI PROGRAM AS REQUIRED BY }  
THE FEDERAL TRANSIT ADMINISTRATION }  
(FTA) FOR RECIPIENTS OF FEDERAL }  
TRANSIT FUNDING }  
\_\_\_\_\_ }

WHEREAS, the City of Turlock (City) submits transit grant applications to the U.S Department of Transportation (DOT) Federal Transit Administration (FTA) for federal operating assistance and capital funding under programs that include, but not limited to, the Urbanized Area Program Transportation funds (§5307) and the Bus and Bus Facility program funds (§5339); and

WHEREAS, the City is a recipient of Federal revenues and is required to meet federal regulatory requirements pursuant to Title VI of the Civil Rights Act of 1964, 42 U.S.C S 2000d et seq., and create a Title VI Program, as established by 49 C.F.R part 21; and

WHEREAS, the FTA has requested the City provide a Title VI Program update that ensures no person or group of persons on the basis of race, color, or national origin is subject to discrimination in the level and quality of transportation services and benefits and that steps are taken to ensure that persons with Limited English Proficiency are provided these rights; and

WHEREAS, the City developed and updated its Title VI Program based on the best practices that meet FTA Guidelines; and

WHEREAS, on October 27, 2020 the City Council considered adoption of the updated Title VI Program at the City Council open public meeting.

NOW, THEREFORE, BE IT RESOLVED that the City Council of the City of Turlock does hereby approve an update to the City of Turlock Title VI Program as required by the Federal Transit Administration (FTA) for recipients of federal transit funding (attached as Exhibit A).

PASSED AND ADOPTED at a regular meeting of the City Council of the City of Turlock this 27<sup>th</sup> day of October, 2020, by the following vote:

AYES: Councilmembers Larson, Esquer, Nosrati, Arellano, and Mayor Bublak  
NOES: None  
NOT PARTICIPATING: None  
ABSENT: None

ATTEST:

\_\_\_\_\_  
Jennifer Land, City Clerk,  
City of Turlock, County of Stanislaus,  
State of California

## Title VI Statement Notice to The Public

EXHIBIT A

### TITLE VI POLICY STATEMENT

The City of Turlock is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services on the basis of race, color or national origin, as protected by Title VI of the Civil Rights Act of 1964. The City assures that every effort will be made to prevent discrimination through the impacts of its programs, policies, and activities on minority and low-income populations. In addition, the City will take reasonable steps to provide meaningful access to services for persons with Limited English Proficiency. If you believe you have been subjected to discrimination under Title VI, you may file a written complaint with the Title VI Coordinator, City of Turlock, 156 South Broadway, Suite 230, Turlock, CA 95830-5454; at (209) 668-5540; or available online complaint forms and instructions at [www.turlocktransit.com](http://www.turlocktransit.com).

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Nathan Bray, P.E., Interim Director  
Development Services Department/  
City Engineer

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Date

## Title VI Policy

### TITLE VI POLICY

The City of Turlock (City) will ensure that all programs, policies, and activities that are funded with federal assistance comply with the Title VI regulations. The City is committed to creating and maintaining a public transit service that is free of all forms of discrimination. The City will take whatever preventive, corrective and disciplinary action necessary for behavior that violates this policy or the rights and privileges it is designed to protect. The City establishes and complies with the following Title VI requirements.

The City ensures compliance in accordance with [49 CFR Section 21.7](#). Every application for financial assistance from FTA must be accompanied by an assurance that the applicant will carry out the program in compliance with Title VI of the Civil Rights Act of 1964, as required to provide an annual Title VI certification and assurance.

The City shall provide information to the public regarding their Title VI obligations and apprise members of the public of the protections against discrimination afforded to them by Title VI. The City as a transit service provider shall disseminate this information to the public through measures that can include but shall not be limited to a posting on the agency's website, as required to notify beneficiaries of protection under Title VI, [49 CFR Section 21.9\(d\)](#).

The City shall develop procedures for investigating and tracking Title VI complaints filed, and make procedures for filing a complaint available to members of the public upon request, as required to develop Title VI Complaint Procedures, [49 CFR Section 21.9\(b\)](#).

The City shall prepare and maintain a list of any active investigations conducted by entities other than the FTA, lawsuits, or complaints naming the recipient that allege discrimination on the basis of race, color, or national origin. This list shall include the date of the investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by the recipient in response to the investigation, lawsuit, or complaint, as required to record Title VI Investigations, Complaints and Lawsuits, [49 CFR Section 21.9\(b\)](#).

The City shall 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 Limited English Proficient (LEP).

The City, at the discretion of the FTA, shall provide information other than that required by the referenced circular as may be requested, in writing, from a recipient in order to investigate complaints of discrimination or to resolve concerns about possible noncompliance with Title VI requirements.

The City shall report certain general information to determine their compliance with Title VI. The collection and reporting of this program constitute the recipients' Title VI Program. To ensure compliance with [49 CFR Section 21.9\(b\)](#), FTA requires that all recipients document their compliance with this chapter by submitting a Title VI Program to FTA's regional civil rights officer once every three years.

TITLE VI PROGRAM UPDATE

Category: Transit - Civil Rights

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## I. PURPOSE

The Federal Transit Administration (FTA) is responsible for ensuring that its funding recipients fully comply with [Title VI of the Civil Rights Act of 1964](#), in their planning and implementation processes. Pursuant to ([Title 49 U.S.C. Chapter 53](#)), as amended, the City of Turlock is the designated recipient of funds under FTA sections §5307 and §5339. Further Federal guidance, provided by [Executive Order 12898](#), highlights the City's responsibility to ensure that Environmental Justice is incorporated into the City's mission to provide safe, convenient, courteous and reliable transit service for the greater Turlock urbanized area.

While it is a matter of principle that the City of Turlock is committed to ensuring that no person is excluded from participation in, or denied the benefits of, or subjected to discrimination in the receipt of any of the City's services on the basis of race, color or national origin, the contents of this program have been prepared in accordance with [Section 601 of Title VI of the Civil Rights Act of 1964](#) and [Executive Order 13166](#) (Improving Access to Services for Persons with Limited English Proficiency). As the designated federal funds recipient, the City prepares a triennial Title VI Update Report in accordance with the [FTA Circular](#) dated October 1, 2012, which assesses compliance of the City, its subrecipients, and contractors with the Civil Rights Act of 1964.

The City must also ensure that there is Title VI consideration whenever there is a change in service that could impact minority communities. In particular, the City transit operations must describe significant service changes relating to hours or days of operation, headways or fares, etc., and provide an analysis of the effect that any proposed changes may have on minority and low-income communities. This policy provides a delineation of that service review.

## II. TITLE VI PROGRAM MONITORING

The requirement to establish internal monitoring processes and methodologies is applicable to all recipients of Federal assistance. The City must monitor its services once a year, or when major service changes are proposed, using the procedures outlined in this section.

### a. Civil Rights Assurance

The Assurances that are signed by the City Manager and attested by the City Attorney, assure that the level and quality of transit service and related benefits are provided in a manner

consistent with Title VI. Program monitoring is conducted to ensure that the City complies with this assurance.

**b. Corrective Actions in Federal Transportation Improvement Plan (FTIP).**

If previous Title VI deficiencies have been found in the City or through an audit review, the corrective action to remedy these deficiencies will be incorporated into Stanislaus Council of Governments' (StanCOG) FTIP to assure compliance with Title VI.

**c. Monitoring Procedures**

The City must implement complaint procedures to monitor the level and quality of transit service provided to the minority community against overall system averages to determine compliance with Title VI. These comparisons will measure the actual realization of established service policies and standards.

### **III. PUBLIC INFORMATION REQUIREMENTS**

The City will disseminate Title VI Program information to its employees, contractors, subcontractors, and beneficiaries as well as the general public. Public dissemination will include the posting of public statements, inclusion the Title VI language in contracts, and publishing annually the Title VI Policy Statement in newspapers having a general circulation in the vicinity of the proposed projects.

**a. Title VI Accessibility**

The City's Title VI Policy and any other related information will be available to the public upon request.

**b. Complaint Procedures**

More detailed information regarding complaint procedures and Title VI Civil Rights statute will be included in brochures and other materials distributed to the public.

**c. Multilingual Requirements.**

Where a significant number or portion of the population eligible to be served by transit needs service information in a language other than English to participate in Federally funded programs, the City shall take every reasonable step to provide information in appropriate languages. In cases where the City posts signs warning the general public about dangerous situations, information must be displayed in iconic post or other languages when a significant number of the population is non-English speaking.

### **IV. LIMITED ENGLISH PROFICIENCY (LEP) PLAN**

Title VI of the Civil Rights Act of 1964 prohibits recipients of federal financial assistance from discriminating against or otherwise excluding individuals on the basis of race, color, or national



origin in any of their activities. It has been recognized that one form of discrimination occurs through an inability to communicate due to a limited proficiency in the English language. [Title VI of the Civil Rights Act of 1964](#), [Executive Order 13166](#), and various directives from the US Department of Justice (DOJ) and the US Department of Transportation requires federal aid recipients to take reasonable steps to ensure meaningful access to programs, services, and activities by those who do not speak English proficiently.

To determine the extent to which LEP services are required and in which languages, the law requires the analysis of four factors:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by the City's programs, services, or activities.
2. The frequency with which LEP individuals come in contact with these programs, services, or activities.
3. The nature and importance of the program, service, or activity to people's lives.
4. The resources available and overall cost.

The goal of the LEP Access Plan is to ensure that the City identify and recognize the needs of the LEP members of the Turlock community and implements a plan to communicate effectively assuring reasonable access to City processes, information, services, and activities.

## Four-factor Analysis

For all service-related planning and policy changes under consideration, City of Turlock Transit Staff will analyze and conduct the four-factor framework provided in the DOT LEP Guidance.

**Factor 1:** *Identify LEP Persons in Transit Service Area. The number and proportions of LEP Persons served or encountered in the City of Turlock's service area.*

Methodology for Data Sources:

- Determine LEP population in Transit Service Area (City of Turlock urbanized area) the most current US Census Data will be the primary base for this analysis. The City will complement the Census data with other data sources available through the California Department of Education Demographics Office.

According to the 2010 U.S. Census data, the 2011 American Community Survey, approximately 37.3% of the City's population speaks a language other than English at home the Spanish language is the most used non-English speaking language at 21% of the City's population. Other spoken at home languages were not specified in the ACS report but recorded at 16% of the population. Of this identified bi-lingual population, 25.5% were recorded as speaking English "less than very well."

The California Department of Education Demographics Office Fiscal Year 2009/2010 Stanislaus County Report further supports this data with 23.3% of enrollments identified as English Learners, with Spanish being the most predominant language with 89.1%.

**Factor 2:** *The frequency of contacts between LEP Individuals and City Transit services.*

Methodology:

- Conduct survey of LEP persons
- Survey and collect data from drivers, route supervisors, and ticket/monthly pass agents to determine the frequency of contact with LEP persons, and quantify the different numbers of total distinguished as the languages spoken.

**Factor 3:** *Assessing the importance of City Transit program, activities, and services.*

Methodology:

- Identify Transit critical services or activities

The City of Turlock Transit Staff has identified the following services or activities:

- Public Notices regarding services or activities
- General route information
- Transit fares
- Safety/security issues
- Awareness of prohibited activities

**Factor 4:** *City resources available and costs.*

Methodology:

- Create an inventory of language assistance measures currently provided, along with the associated cost.
- Determine what, if any, additional services are needed to provide meaningful access.
- Analyze City annual transit/transportation budget.

The City of Turlock will ensure that public notices and general information, such as the riders guide is written in Spanish and made available for viewing in places where individuals with limited English proficiency congregate such as the Roger K. Fall Transit Center. In addition, to improve meaningful access, transit fares have been written in Spanish and posted on the buses and at the Transit Center.

City Transit staff will also maintain a list of those staff members who speak a language other than English to provide points of contact for person needing information.

## **Language Assistance Plan**

Based on findings of the four-factor analysis, the City recognizes the need to continue providing language services in its transit service area. A review of relevant City programs, activities, and services that are being offered or will continue to be offered by the City include the following:

- Maintain a list of employees who competently speak Spanish and are willing to provide translation and/or interpretation services and distribute this list to staff that regularly have contact with the public.
- Vital documents and available in both English and Spanish.
- Public Notices are available in both English and Spanish.
- General information, such as transit maps and bus stop information available in English and Spanish.
- Transit fare information posted in both English and Spanish.
- Outreach meetings/forums are conducted regularly to inform communities of the services offered by the City. Information is provided by bilingual staff on site to answer any questions and to address concerns.

The City will contact the community organizations that serve LEP persons, as well as LEP persons themselves, and perform a four-factor analysis every three years to identify what, if any additional information or activities that, might better improve the City services to assure non-discriminatory services to LEP persons. The City Transit staff will then evaluate the projected financial and personnel needed to provide the requested service enhancement and assess the cost-effectiveness of the improvement.

The failure to provide written translations under the circumstances outlined above does not mean there is noncompliance. Instead, the safe harbor provisions provide a guide to enhance compliance requirements than can be provided by a fact-intensive, four factor analysis.

## V. TITLE VI SERVICE REVIEW

A Title VI analysis shall occur whenever there is a significant change to service provision, including the following:

- Route extensions
- Route eliminations
- Frequency changes of more than 25%

Major service adjustments are generally those that constitute an aggregate change of 25 percent or more in route miles or hours when compared on a daily basis. This includes system wide route restructuring, or adding and deleting service. Other types of major service adjustments may include significant changes to how transit services are provided.

### Major Service Adjustment Review

For changes that impact 25% or more routes within the service area, the City shall conduct a Title VI review that includes the following:

- **Level of Service Review**

Service provided to minority communities under the service change proposal shall be measured in terms of current City standards for frequency, span of service, vehicle load and distance to bus routes to determine if any proposed change would result in disproportionately high and adverse impacts to minority communities. This analysis shall include the identification of minority census tracts for purposes of comparing outcomes in those areas to those in the general service area.

- **Quality of Service Review**

Using transit travel time, fare matrices, or other appropriate indices, the City shall analyze the service provided to minority communities under the service proposal. The City shall select the top three most traveled destinations in the service area and compare the impacts associated with the proposal on minority and non-minority communities to determine if the proposal will result in disproportionately high and adverse impacts to minority communities. The review shall include cost per revenue mile and number of affected riders.

- **Mitigation of Impacts**

If the service proposals result in adverse or disproportionate impact on minority or low-income communities, the City must identify the following:

- Alternatives to the service proposal that would have fewer negative impacts and rationale for not selecting them
- Transit options that would be available for riders who would be negatively affected
- Measures to avoid, minimize or mitigate the negative impacts of the service change

### Minor Service Adjustment Review

Also covered under this policy are other changes to service that may result in a disproportionately high and adverse impact to minority communities as referenced in the FTA Circular, yet do not meet the 25% threshold for "Major Adjustments of Transit Service". These changes shall be characterized as "Minor Service Adjustments".

For changes that impact fewer than 25% of the routes within the service or planning area, the City shall conduct a Title VI analysis that includes the following:

- **Level of Service Review**

Service provided to minority communities under the service change proposal shall be evaluated in terms of current City standards for frequency, span of service, vehicle load and access to bus routes to determine if any proposed service change would result in disproportionately high and adverse impacts to minority communities.

The evaluation should identify any changes to the following within the affected minority and low-income neighborhoods:

- Number of riders affected
- Service frequency
- Span of service
- Walking distance to bus route

- **Mitigation of Impacts**

The City shall also identify whether the minor service changes would result in adverse or disproportionate impacts on minority and low-income communities, and provide a description, if any, of the mitigations, options and alternatives.

## **VI. ENVIRONMENTAL JUSTICE**

The concept of environmental justice includes the identification and assessment of disproportionately high and adverse effects of programs, policies, or activities on minority and low-income population groups. Within the context of transportation planning, environmental justice considers the relative distribution of costs and benefits from transportation investment strategies and policies among different segments of society.

The City shall be responsible for evaluating and monitoring environmental justice compliance with Title VI. The City staff will:

- Ensure Title VI environmental compliance
- Analyze and make findings regarding the population affected by the action
- Analyze and make findings regarding the impacts of planned projects on protected Title VI groups, and determine if there will be a disproportionately high and adverse impact on these groups.

## VII. COMPLAINTS OF DISCRIMINATION PROCEDURE

These procedures cover all complaints filed under [Title VI](#) of the Civil Rights Act of 1964, [Section 504 of the Rehabilitation Act of 1973](#), [Civil Rights Restoration Act of 1987](#), and the [Americans with Disabilities Act of 1990](#), relating to any program or activity administered by the City of Turlock as to consultants, and Contractors. Intimidation or retaliation of any kind is prohibited by law. The procedures do not deny the right of the complainant to file formal complaints with other state or federal agencies or to seek private counsel for complaints alleging discrimination. Every effort will be made to obtain early resolution of complaints at the lowest level possible. The option of informal mediation meeting(s) between the affected parties and the Title VI Coordinator may be utilized for resolution.

### Complaint Procedure:

1. Any individual, group of individuals or entity that believes they have been subjected to discrimination prohibited by nondiscrimination requirements may file a complaint with the City of Turlock. A formal complaint must be filed within 180 days of the alleged occurrence.
2. In cases where the complainant is unable or incapable of providing a written statement, a verbal complaint may be made. The Title VI Coordinator will interview the complainant and if necessary assist the person in converting verbal complaints to writing. All complaints must, however, be signed by the complainant or his/her representative.
3. Complaints shall state, as fully as possible, the facts and circumstances surrounding the alleged discrimination.
4. The City of Turlock will provide the complainant or his/her representative and any Contractor (respondent) with a written acknowledgement that the City has received the complaint within five (5) working days of receipt.
5. A copy of the complaint will be forwarded to the City Attorney for review.
6. The Title VI Coordinator will assign an investigator to the complaint (this may be the Title VI Coordinator or other designated staff).
7. The Investigator will determine if the complaint has investigative merit:
  - a. It was received within 180 days of the alleged occurrence.
  - b. It does not appear to be frivolous or trivial.
  - c. It involves the City or City Contractors and not another entity.
  - d. A complaint against a Contractor involves a Federally Funded contract.
8. The complainant and Contractor or other party to the complaint will be notified of the status of the complaint within 10 days of receipt of the complaint, by registered mail;

- a. That the complaint will not be investigated and the reasons why the complaint does not have investigative merit.
  - b. That the complaint will be investigated and a request for additional information is needed to assist the investigator.
9. The complainant or Contractor must submit the requested information within 60 working days from the date of the original request. Failure of the complainant to submit additional information within the designated timeframe may be considered good cause for a determination of no investigative merit. Failure of the Contractor to submit additional information within the designated timeframe may be considered good cause for a determination of noncompliance under the contract.
10. The internal investigator and/or Contractor must within 15 working days of complaint receipt, supply the Title VI Coordinator with status report of their investigation and/or resolution of the complaint.
11. Within 60 working days from the receipt of the complaint, the investigator will prepare a written report for the Title VI Coordinator. The report shall include:
  - a. A narrative description of the incident, including persons or entities involved.
  - b. A statement of the issues raised by the complainant and the respondent's reply to each of the allegations.
  - c. Citations of relevant Federal, State and local laws, City policy etc.
  - d. Description of the investigation, including list of the persons contacted and a summary of the interviews conducted.
  - e. A statement of the investigator's finding and recommendations for disposition.
12. The investigative report and findings of the complaint will be sent to legal counsel for review.
13. The Title VI Coordinator shall, based on the information before him or her and in consult with legal counsel, make a determination on the disposition of the complaint. Determination shall be made within 10 days from Title VI Coordinator's receipt of the investigator's report.

Examples of disposition are as follows:

  - a. Complainant is found to have been discriminated against. The City or Contractor is therefore in noncompliance with Title VI regulations. Reasons for the determination will be listed. Remedial actions that the City or the Contractor must take will be listed in a Final Remedial Action Plan.
  - b. Complaint is found to be without merit. Reasons why will be listed.
14. Notice of the Title VI Coordinator's determination will be mailed to the complainant and Contractor. Notice shall include information regarding appeal rights of complainant and instructions for initiating such an appeal.

Example of a notice of appeal follows:

- a. The City will only reconsider this determination if new facts are presented, that were not previously considered.
  - b. If the complainant is dissatisfied with the determination and/or resolution set forth by the City, the same complaint may be submitted to the Federal Transit Administration (FTA) for investigation. For more information, please contact the Federal Transit Administration, Office of Civil Rights, 90 7<sup>th</sup> Street, Suite 15-300, San Francisco, CA 94103 / (415) 734-9490.
15. A copy of the complaint and the City's investigation report/letter of finding and Final Remedial Action Plan will be issued to FTA within 90 days of the receipt of the complaint.
16. After receiving FTA's comments, briefings may be scheduled with all relevant parties to the complaint.
17. A summary of the complaint and its resolution must be included in the annual report to the FTA.

## **VIII. GENERAL REPORTING REQUIREMENTS**

The Department of Justice and Department of Transportation regulations implementing Title VI require Federal agencies to collect data and other information to enforce the Title VI. In this regard the City, as an applicant and/or recipient receiving Federal funding, hereby provides to FTA the following information:

- There are no active lawsuits or complaints naming the City of Turlock nor were there any investigations, complaints, or lawsuits in the past three years which allege discrimination on the basis of race, color, or national origin with respect to service or other transit benefits.
- There are currently no pending construction projects which would negatively impact minority communities being performed by the City.

## **IX. RECORD KEEPING REQUIREMENTS**

The Title VI Coordinator shall ensure that all records relating to the City's compliance to Title VI are maintained for a minimum of seven years. Records will be available for compliance review audits. Copies of the following material will be kept available by the Title VI Coordinator for dissemination to the public upon demand:

- The City of Turlock's Title VI policy.
- Annual reports to FTA.
- Audit report findings and recommendations.
- Summaries of actions taken by the City to remedy audit findings.
- Complaints received and a summary of their disposition.
- Annual report to Title VI Coordinator regarding Title VI compliance.



# Appendices

## FTA TITLE VI PROGRAM UPDATE APPENDICES

The City of Turlock transit operation is funded, in part, with funds from the Federal Transit Administration (FTA). The following documents shall support full compliance of the Title VI requirements developed in FTA Circular 4702.1 B.

### Appendix A: Policy Statement Notice to the Public

#### TITLE VI POLICY STATEMENT

The City of Turlock is committed to ensuring that no person is excluded from participation in, or denied the benefits of, its transit services on the basis of race, color or national origin, as protected by Title VI of the Civil Rights Act of 1964. The City assures that every effort will be made to prevent discrimination through the impacts of its programs, policies and activities on minority and low-income populations. In addition, the City will take reasonable steps to provide meaningful access to services for persons with Limited English Proficiency. If you believe you have been subjected to discrimination under Title VI you may file a written complaint with the Title VI Coordinator, City of Turlock, 156 South Broadway, Suite 230, Turlock, CA 95380-5454; by phone at (209) 668-5540; or through available online complaint forms and instructions at <http://www.turlocktransit.com>.

This public notice is posted on transit vehicles, common area of City Hall, and at The Roger K. Fall Transit Center. Notice also placed on the City's website [www.turlocktransit.com](http://www.turlocktransit.com).

## Appendix B: Title VI Checklist

In compliance with FTA Title VI regulations the City of Turlock will ensure that the following list of information are submitted to the Federal Transit Administration every three years or when that date and time is determined by the FTA.

- Title VI Notice to the Public, including a list of locations where the notice is posted
- Title VI Complaint Procedures
- Title VI Complaint Form
- List of transit-related Title VI investigations, complaints, and lawsuits
- Public Participation Plan, including information about outreach methods to engage minority and Limited English Proficient (LEP) populations, as well as a summary of outreach efforts made since the last Title VI Program submission
- Language Assistance Plan for providing language assistance to persons with LEP, based on the DOT LEP Guidance
- A table depicting the membership of non-elected committees and councils, the membership of which is selected by the recipient, broken down by race, and a description of the process the agency uses to encourage the participation of minorities on such committees
- Primary recipients shall include a description of how the agency monitors its subrecipients for compliance with Title VI, and a schedule of subrecipient Title VI Program submissions
- A Title VI equity analysis if the recipient has constructed a facility, such as a vehicle storage facility, maintenance facility, operation center, etc.
- A copy of board meeting minutes, resolution, or other appropriate documentation showing the board of directors or appropriate governing entity of official(s) responsible for policy decisions reviewed and approved the Title VI Program. For State DOT's, the appropriate governing entity is the State's Secretary of Transportation or equivalent. The approval must occur prior to submission to FTA.
- Service Standards
  - Vehicle load for each mode
  - Vehicle headway for each mode
  - On time performance for each mode
- Service policies
  - Transit Amenities for each mode
  - Vehicle Assignment for each mode

## Appendix C: Complaint Forms (following four pages)



**Title VI Complaint Form  
City of Turlock  
Office of Compliance**

Turlock 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, national origin, age, gender, or disability pursuant to Title VI of the Civil Rights Act of 1964, as amended. Title VI complaints must be filed within 180 days from the date of the alleged discrimination.

The following information is necessary to assist us in processing your complaint. If you require any assistance in completing this form, please contact Toby Wells, Title VI Coordinator, by calling (209) 668-5540. The completed form must be returned to the City Manager's Office at 156 S. Broadway, Suite 230, Turlock, CA 95380.

Your Name:	Phone:
Street Address:	Alt Phone:
	City, State and Zip Code:
Person(s) Discriminated against (if someone other than complainant): Name(s):	
Street Address, City, State and Zip Code:	

Which of the following best describes the reason for the alleged discrimination? (Check one)

- RACE
- COLOR
- NATIONAL ORIGIN (LIMITED ENGLISH PROFICIENCY)
- AGE
- GENDER
- DISABILITY

Date of Incident: \_\_\_\_\_

Time of Incident: \_\_\_\_\_

Please describe the alleged discrimination incident. Provide the names and titles of all Turlock employees responsible. Explain what happened, whom you believe was responsible, and other specific relevant information. Please use the next page of this form if additional space is required.

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(Complete next page of form)

**Title VI Complaint Form  
City of Turlock  
Office of Compliance**

Please describe the alleged discrimination incident (continued)

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Have you filed a complaint with any other federal, state, or local agencies? (Check one)  YES  NO

If so, list agency(s) and contact information below:

Agency (name): \_\_\_\_\_ Contact Name: \_\_\_\_\_  
\_\_\_\_\_  
(Street Address, City, State & Zip Code) Phone: \_\_\_\_\_

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Agency (name): \_\_\_\_\_ Contact Name: \_\_\_\_\_  
\_\_\_\_\_  
(Street Address, City, State & Zip Code) Phone: \_\_\_\_\_

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I affirm that I have read the above charge and it is true to the best of my knowledge.

\_\_\_\_\_  
Complainant's Signature: Date:

Print or Type Full Name of Complainant

Date Received: _____
Received By: _____



## Formulario de Quejas Title VI City of Turlock Oficina de Cumplimiento

Turlock se compromete a garantizar que ninguna persona sea excluida de participar o se le nieguen los beneficios de sus servicios por motivos de raza, color, origen nacional, edad, sexo o discapacidad de conformidad con el Título VI de la Ley de Derechos Civiles de 1964, como modificado. Las quejas del Título VI deben presentarse dentro de los 180 días a partir de la fecha de la supuesta discriminación.

La siguiente información es necesaria para ayudarnos a procesar su queja. Si necesita ayuda para completar este formulario, comuníquese con Toby Wells, Coordinador del Título VI, llamando al (209) 668-5540. El formulario completado debe devolverse a la Oficina del Administrador de la Ciudad en 156 S. Broadway, Suite 230, Turlock, CA 95380.

Su nombre:	Teléfono:
Dirección:	Segundo Teléfono:
	Ciudad, estado, y Código Postal:
Persona(s) que sufrieron discriminación (si es otra que el firmante): Nombre(s):	
Dirección, Ciudad, estado, y Código Postal:	

¿Cuál de los siguientes describe mejor la razón por la supuesta discriminación? (Marque uno)

- |  |                               |                            |
|--|-------------------------------|----------------------------|
| <input type="checkbox"/> RAZA  | <input type="checkbox"/> EDAD | Fecha del Incidente: _____ |
| <input type="checkbox"/> COLOR   | <input type="checkbox"/> SEXO | Hora del Incidente: _____  |
| <input type="checkbox"/> ORIGEN NACIONAL (Dominio limitado del inglés) |                               |                            |
| <input type="checkbox"/> DISCAPACIDAD                                  |                               |                            |

Describa el supuesto incidente de discriminación. Proporcione los nombres y títulos de todos los empleados responsables de Turlock. Explique qué sucedió, quién cree que fue responsable y otra información relevante específica. Utilice la siguiente página de este formulario si se requiere espacio adicional.

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(Llene el reverse de este formulario)

**Formulario de Quejas Title VI  
City of Turlock  
Oficina de Cumplimiento**

Pro favor, describa el supuesto incidente de discriminación (continuación)

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¿Ha presentado una queja ante otras agencias federales, estatales o locales? (Marque uno)

Si  No

Si es así, enumere la agencia(s) y la información de contacto a continuación:

Nombre de agencia: \_\_\_\_\_ Nombre de contacto: \_\_\_\_\_  
\_\_\_\_\_  
(Dirección, Ciudad, Estado y Código Postal) Teléfono: \_\_\_\_\_

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Nombre de agencia: \_\_\_\_\_ Nombre de contacto: \_\_\_\_\_  
\_\_\_\_\_  
(Dirección, Ciudad, Estado y Código Postal) Teléfono: \_\_\_\_\_

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Afirmo que he leído la publicación anterior y es fiel a mi leal saber y etender.

\_\_\_\_\_  
Firma del Demandante:

\_\_\_\_\_  
Fecha:

Escriba el Nombre del Demandante

Fecha de recepción: _____
Recibido por: _____

# Appendix D: LEP IMPLEMENTATION PLAN

## LEP IMPLEMENTATION PLAN

### Providing Language Assistance to LEP Individuals

StanCOG is dedicated to providing LEP individuals with meaningful access to materials by ensuring that effective communication exists between the project, activity, or service and the LEP individuals.

The essential key to accomplish effective communication lies in the following ability to:

1. Identify LEP individuals
2. Notify LEP individuals of the availability of language assistance services
3. Provide Language Assistance Measures to translate vital documents
4. Train staff in how to identify and assist LEP individuals
5. Monitor and evaluate access to language assistance

In order to achieve these critical elements and provide meaningful access and communication to LEP individuals, StanCOG will coordinate with its staff, Policy Board, Advisory Committees, and community stakeholders to identify and pursue efforts to address the needs of the LEP population throughout the Stanislaus region. These efforts are described in the following sections below.

### 1. Identify LEP Individuals

StanCOG will continue its efforts to identify LEP individuals and address their language assistance needs.

- In this process, StanCOG will 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.
- Also, at StanCOG events, staff will informally engage participants to establish each attendee's ability to speak and understand English.
- StanCOG will use Census Bureau Language Identification Flashcards at public meetings to assist in identifying language assistance needs for future events and meetings (see Appendix F: I-Speak Identification Flash Cards).

### 2. Notify LEP Individuals of the Availability of Language Assistance Services

When possible, StanCOG will notify LEP individuals of the availability of language assistance services in advance of meetings and with publication of vital documents that may encounter or affect LEP individuals. When a target audience is expected to include a large number of LEP individuals, StanCOG will prepare documents, meeting notices, flyers and agendas in the alternative language based on the known LEP population. Interpreters will be available as needed.

Public participation is a key component in StanCOG's entire regional planning process. The policies and procedures established in StanCOG's currently adopted 2009 Public Participation Plan (PPP) enable all members of the public to actively participate in the planning and decision-making processes undergone during the development of the region's long-range planning and funding documents.

Opportunities for public involvement can be seen in a wide-range of activities currently undertaken by StanCOG:

- Participation of citizens in the Policy Board meeting, and all other standing, adhoc, and other technical committee meetings conducted by StanCOG;
- Direct participation of the Citizens Advisory Committee in StanCOG's formal planning process;
- Placement of public hearing notices in both English and Spanish newspapers of general circulation;
- Presentations to and meetings with community groups, organizations, and traditionally underrepresented or underserved minority populations;
- Representation from the elderly, disabled, low-income, and minority (i.e. Black/African American, Hispanic, Asian American, American Indian/Alaskan Native, and Pacific Islander) population groups on StanCOG's Social Services Transportation Advisory Council;
- Dissemination of news releases and public service announcements (with translation available);
- Public outreach efforts and information provided through the local media sources; • Preparation and distribution of the StanCOG informational brochure (provided in English and Spanish languages);
- Continual utilization of StanCOG's web page to disseminate information to the public regarding draft planning documents, new policies, and upcoming public hearings;
- Providing for a regional public forum for plan implementation project teams to identify and address specific regional planning opportunities.

StanCOG will continue to work with community-based organizations throughout the Stanislaus region to inform LEP individuals of available language assistance opportunities and translation services. Through collaborating with the community and stakeholder groups, StanCOG can better determine what information regarding community development programs and projects are most important to those who speak languages other than English.

Publications in local newspapers, online, and through other media will be available in the pertinent LEP language of the target area to spread up-to-date information regarding meeting schedules, project status, and language assistance opportunities.

### **3. Provide Language Assistance Measures to Translate Vital Documents**

To serve LEP individuals, StanCOG provides numerous language assistance measures including both oral and written language services. StanCOG will provide interpretive services, within reason, for public meetings, if advance notice is provided to StanCOG and such services are readily available. Upon request, StanCOG will also make translated versions (or provide



interpretation of relevant sections) of documents/publications available within a reasonable timeframe and if resources permit.

StanCOG will identify those documents deemed vital and provide translated services, as needed and as described above. A list of forms and documents commonly used by LEP individuals will be maintained and reviewed regularly. These documents may include applications, consent forms, letters containing information regarding program participation, meeting and event notices, notification to LEP persons informing them of free language assistance, and general outreach materials.

StanCOG will attempt to access language assistance services from a professional translation service or qualified community volunteers, when an interpreter is needed in person or on the telephone. A list of volunteers will need to be developed.

The following list identifies StanCOG's LEP procedures:

- All committee agenda packets and report documents are advertised as being able to be translated upon written request (notification is placed in the public hearing and directly on the agenda packet);
- Major mailers and public information handouts are published in both English and Spanish languages, and can be further translated upon request;
- During StanCOG's outreach to local social organizations, both verbal and visual presentations have been translated into Spanish, as needed;
- Public information and hearing notices are posted in both English and Spanish language newspapers of general circulation, including the Modesto Bee and Vida en el Valle, which covers Stanislaus and San Joaquin Counties with a weekly circulation of approximately 30,000 papers;
- StanCOG's planning processes and policy decisions are currently covered by English and Spanish news media sources, and are further open to other minority media sources;
- All public workshops and hearings are structured to involve citizen participation from all populations, with translation either provided directly by StanCOG staff (current staff includes two fluent Spanish language speakers) or allowed by a translator brought in to represent the person or group involved.

#### **4. Train Staff on How to Identify and Assist LEP Individuals**

Awareness training and LEP informational meetings will be provided to StanCOG staff to educate its members about the Title VI LEP requirements and how to provide meaningful access to services for LEP individuals.

StanCOG staff will have knowledge of current areas of LEP groups throughout the Stanislaus region and their language assistance needs. To address potential LEP individuals' needs, informational materials regarding language assistance services will be readily available to StanCOG staff. Staff will also be instructed on how to use the Census Bureau's language identification flashcards to further help identify and document the language assistance needs of LEP individuals.

In addition, StanCOG staff provides extensive data and technical assistance to the region's three public transit operators, and to multiple social service agencies that provide transportation

services for elderly and disabled populations within the Stanislaus region. As the Metropolitan Planning Organization (MPO) and Regional Transportation Planning Agency (RTPA), StanCOG maintains a record of census and other demographic data for Stanislaus County. This public information is made available to public transit operators and private social service agencies to support the updating and development of their Title VI compliance information. In addition, StanCOG's Social Services Transportation Advisory Council (SSTAC) provides a forum for regional public and private social service transit agencies to collaborate on identifying and addressing the transportation needs of every population group within the region.

StanCOG will annually review the Title VI complaint procedures and LEP plan with its staff members to ensure efficient management and assistance to LEP individuals. This review will include how StanCOG handles LEP complaints using the documented Title VI procedures, and potential methods to improve meeting the needs of LEP individuals. Staff will be trained regularly on how to assist LEP groups utilizing the LEP plan and Title VI complaint process, and will have resources available to assure effective language assistance to LEP individuals through telephone and in-person contact.

## **5. Monitor and Evaluate Access to Language Assistance**

StanCOG will review this LEP Plan annually to ensure reasonable efforts are made to identify and address the needs of LEP individuals in the Stanislaus region.

Further updates of the LEP plan will include:

- Updates on demographic information concerning LEP populations.
- Analysis of LEP individuals encountered.
- How the needs of LEP persons have been addressed.
- Determination on the effectiveness of language assistance measures.
- Determination if the needs of language services have changed.
- Evaluation of the Title VI Complaint process and addressing past complaints.
- Evaluation of StanCOG's performance in adhering to the objectives of the LEP plan.

StanCOG continues to actively encourage public participation to ensure that all members of the public have an equal opportunity in the planning and decision-making process conducted by StanCOG and all of its member agencies.

In developing the 2020 Public Participation Plan, 2014 Regional Transportation Plan, and 2019 Federal Transportation Improvement Program, StanCOG has ensured that all Title VI provisions have been followed.

StanCOG has not been involved in any civil rights compliance review activities in the past three years or named in any lawsuits involving non-compliance with the Title VI provisions. StanCOG adheres to the equal employment opportunities processes. StanCOG intends to take many more proactive steps to further improve the quality of transit service for all residents within the Stanislaus region. Furthermore, StanCOG will continue to explicitly assess the impact of proposed transit investments on low income and minority populations throughout all future transportation project/program development.

## Dissemination of StanCOG's LEP Plan

StanCOG's LEP Plan and Title VI Civil Rights Complaint Procedures are available on StanCOG's website at [www.stancog.org](http://www.stancog.org). Any person or agency with internet access will be able to access and download the plan from the StanCOG 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. LEP individuals may request translated copies of the plan, which StanCOG will provide, if feasible.

## Appendix E: Minority Representation on Committees and Councils

Table: Representation of Members on StanCOG's Planning Committees and Councils or Advisory Boards

Committee Body	Caucasian	Hispanic/Latino	African American	Asian American	Native American
Executive	4	1	0	0	0
Management and Finance	9	1	0	0	0
Citizen Advisory	12	0	0	0	0
Social Services Transportation	5	1	0	0	0
Bike & Pedestrian Advisory	6	1	1	0	0

(Data last updated on December 2017)

## Appendix F: Public Engagement

### Outreach Efforts since last Title VI Program submission

The City of Turlock staff has conducted community outreach meetings to provide an overview of the unmet transit needs assessment process, to solicit input LEP residents on transit service developments, and to engage members of the public during the Short-Range Transit Plan development process. Planning materials are commonly translated into Spanish to actively engage and involve residents who often do not participate in formal public comment meetings and city government events.

## Appendix G: Equity Analysis

Requirement to prepare Title VI equity analysis for construction projects

The City of Turlock is aware of Title VI requirements for an equity analysis for the construction of a vehicle storage facility, maintenance facility, operations center, and similar facilities and will comply with equity analysis requirements for any such project.

## Appendix H: Service standards

### Vehicle Load Standards

Average vehicle loads during peak operations must not exceed:

Vehicle Type	Average Passenger Capacities			
	Seated	Standing	Total	Maximum Load Factor
29' Cutaway Bus	17	8	25	1.5
35' Low Floor Bus	29	14	43	1.5

### Vehicle Headway Standards

Weekday	Peak	Base	Evening	Night
Regional Trunk				
Urban Radial	35 min	35 min	30 min	30 min
Cross Town				
Secondary Radial				
Feeder				
Peak Express				
Employer Feeder				

Saturday	Day	Evening	Night
Regional			
Urban Radial	35 min	30 min	30 min
Cross-Town			
Secondary Radial			
Feeder			
Peak Express			
Employer Feeder			

**On-Time Performance Standards**

Transit vehicles will complete their established runs no more than five (5) minutes early or late in comparison to Turlock Transit’s published timetables.

A vehicle is considered on time if it departs from a scheduled timepoint no more than one (1) minute early and no more than five (5) minutes late. Turlock Transit’s on-time performance objective is ninety percent (90%) or greater.

	FIXED ROUTE		PARATRANSIT	
	ACTUAL	GOAL	ACTUAL	STANDARD
Vehicle load	2.1 persons	32 persons	2.4 persons	8 persons
Vehicle headway	30 minutes	30 minutes	N/A	N/A
On-time performance	5 min of schedule	5 min of schedule	20 min of schedule	30 min of schedule
Service availability	80% of residents within 1/4 mile of service route	90% of resident within 1/4 mile of service route	IJZA boundary (Stanislaus County)	3/4 mile of Fixed Route service

## Appendix I: Service policies

	FIXED ROUTE		PARATRANSIT	
	ACTUAL	GOAL	ACTUAL	STANDARD
Transit Amenities	Daily boardings exceed 10 persons	Daily boardings exceed 20 persons	N/A	
Vehicle Assignment	5 35' vehicle per six routes	One 35' vehicle per route	Two 14 passenger vehicles	Two 14 passenger vehicles