



2024 Title VI Program

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 BLaST 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.

As a result of the City's commitment to listening and taking feedback received from the community, the City decided to enhance its transportation services in Turlock through the inclusion of two new projects. On September 6, 2022, route (Route 7) was added to our fixed route service and our Dial-A-Ride (DAR) program was enhanced by splitting it into a focused, complimentary Paratransit service and launching a new On-Demand pilot program. The added On-Demand service provides door-to-door transportation within Turlock and neighboring Denair for all area residents.

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 185,410 passengers in Fiscal Year (FY) 2019-20 (pre-pandemic numbers) to 337,067 in FY 2023-24.

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 RESCINDING RESOLUTION	}	RESOLUTION NO. 2024-
NO. 2024-011 AND APPROVING AN UPDATE TO	}	
THE CITY OF TURLOCK'S TITLE VI PROGRAM	}	
FOR FEDERAL FISCAL YEARS (FFY) 2024-2026	}	
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 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 (49 U.S.C. §5307) and the Bus and Bus Facility program funds (49 U.S.C. §5339); and

WHEREAS, as a recipient of federal funds the City is required to meet federal regulatory requirements pursuant to Title VI of the Civil Rights Act of 1964, 42 U.S.C § 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 that 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, on February 13, 2024, the City Council adopted the Federal Fiscal Year (FFY) 2024-2026 Title VI Program through Resolution No. 2024-011, demonstrating the City's commitment to ensuring equitable access to transportation services and compliance with federal civil rights regulations; and

WHEREAS, following the review and comments provided by the Federal Transit Administration (FTA), the City recognizes the need to address compliance issues and enhance its Title VI Program; and

WHEREAS, to maintain full compliance with FTA regulations and further strengthen its commitment to civil rights and equitable transit services, the City seeks to adopt an updated version of the FFY 2024-2026 Title VI Program that incorporates the FTA's feedback and recommendations.

NOW, THEREFORE, BE IT RESOLVED that the City Council of the City of Turlock does hereby rescind Resolution No. 2024-011 and approve an update to the City of Turlock's Title VI Program for Federal Fiscal years (FFY) 2024-2026 as required by the Federal Transit Administration (FTA) for recipients of federal transit funding.

PASSED AND ADOPTED at a regular meeting of the City Council of the City of Turlock this 22nd day of October, 2024, by the following vote:

AYES:

NOES:

NOT PARTICIPATING:

ABSENT:

ATTEST:

Julie Christel, City Clerk,
City of Turlock, County of Stanislaus,
State of California

Title VI 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>. For additional information on Title VI obligations or any other Title VI related questions or comments, please contact the Title VI Coordinator at the information listed above. For all other questions and comments, please contact City of Turlock's Transit Administration office at 1418 N. Golden State Blvd, Suite 1, Turlock, CA 95380 or at (209) 669-2800.

This public notice is posted on transit vehicles, rider's guides, a common area of City Hall, and at The Roger K. Fall Transit Center. Notice also placed on the City's website www.turlocktransit.com.

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

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 Title VI Policy Statement in rider guides.

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 identifies and recognizes 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

This Limited English Proficiency (LEP) Plan was developed as part of the City of Turlock's Title VI Program to ensure that all City transit services are accessible to individuals with limited English proficiency. The plan aims to eliminate language barriers and provide equal access to City transit programs, services, and activities for LEP residents. By implementing this comprehensive LEP Plan, Turlock demonstrates its commitment to inclusivity and compliance with federal civil rights laws.

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 2020 U.S. Census data and the 2022 American Community Survey (ACS), approximately 34% 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 23% of the City's population.

The ACS report did not specify other languages spoken at home, but it did record 11% of the population.

The California Department of Education Demographics Office's Fiscal Year 2022/2023 Stanislaus County Report corroborates this data, revealing that 25% of enrolled students are classified as English learners, with Spanish being the predominant language among them at 79%.

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 the importance of services provided by the City of Turlock to the LEP population.

The city's transit services serve as the essential lifeline for individuals who rely on public transportation to navigate their daily lives, facilitating access to medical appointments, shopping, and commuting to school and work.

The City of Turlock Transit Staff has identified the following activities to help enhance communication with LEP individuals

- Translation of public notices regarding services or activities
- Translation of general route information
- Translation of transit fare information
- Translation of safety/security information
- Translation of information that raises the 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. Lastly, a built-in widget on the Turlock Transit website enables for information to be translated to major languages.

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 are 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, or its contractor(s)/agent(s), will contact the community organizations that serve LEP persons, as well as LEP persons themselves, and perform a four-factor analysis during the development of its Short-Range Transit Plan (SRTP) 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 7th 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 five 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

City of Turlock transit operations are 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>. For additional information on Title VI obligations or any other Title VI related questions or comments, please contact the Title VI Coordinator at the information listed above. For all other questions and comments, please contact City of Turlock's Transit Administration office at 1418 N. Golden State Blvd, Suite 1, Turlock, CA 95380 or at (209) 669-2800.

This public notice is posted on transit vehicles, rider's guides, a common area of City Hall, and at The Roger K. Fall Transit Center. Notice also placed on the City's website 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)



Non-Discrimination 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. Discrimination 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 Sarah Eddy, 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.

(Complete next page of form)

**Non-Discrimination Form
City of Turlock
Office of Compliance**

Please describe the alleged discrimination incident (continued)

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: _____

_____ Phone: _____

(Street Address, City, State & Zip Code)

Agency (name): _____ Contact Name: _____

_____ Phone: _____

(Street Address, City, State & Zip Code)

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 Denuncia de no Discriminación
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, en su versión modificada. Las denuncias por discriminación deben presentarse en un plazo de 180 días a partir de la fecha de la presunta discriminación.

La siguiente información es necesaria para ayudarnos a procesar su queja. Si necesita ayuda para completar este formulario, comuníquese con Sarah Eddy, 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)

- RAZA
- EDAD
- COLOR
- SEXO
- ORIGEN NACIONAL (Dominio limitado del inglés)
- DISCAPACIDAD

Fecha del Incidente: _____

Hora del Incidente: _____

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.

(Llene el reverse de este formulario)

**Formulario de Denuncia de no Discriminación
City of Turlock
Oficina de Cumplimiento**

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

¿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: _____

Nombre de agencia: _____ Nombre de contacto: _____

(Dirección, Ciudad, Estado y Código Postal) Teléfono: _____

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

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

The City of Turlock 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 accomplishing effective communication lies in the following ability:

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, the City of Turlock will coordinate with its staff, and community stakeholders to identify and pursue efforts to address the needs of the LEP population throughout the City of Turlock. These efforts are described in the following sections below.

1. Identify LEP Individuals

The City of Turlock will continue its efforts to identify LEP individuals and address their language assistance needs.

- In this process, the City of Turlock 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 City of Turlock events, staff will informally engage with participants to establish each attendee's ability to speak and understand English.
- The City of Turlock 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, the City of Turlock 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, the City of Turlock 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 the City of Turlock's planning process. The policies and procedures established in StanCOG's currently adopted 2020 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 the City of Turlock:

- Placement of public hearing notices at the City of Turlock's bus bays and lobby area in both English and Spanish;
- Presentations to and meetings with community groups, organizations, and traditionally underrepresented or underserved minority populations;
- Dissemination of news releases and public service announcements (with translation available);
- Public outreach efforts and information provided through the local media sources; (provided in English and Spanish languages);
- Continual utilization of the City of Turlock'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.
- Public outreach efforts at events such as the Stanislaus County Fair, at local public schools, at Stan State hosted events, and other partnership opportunities with local community organizations and stakeholders.

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

Online publications 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, the City of Turlock provides numerous language assistance measures including both oral and written language services. The City of Turlock will provide interpretive services, within reason, for public meetings, if advance notice is provided to the City of Turlock and such services are readily available. Upon request, the City of Turlock will also make translated versions (or provide interpretation of relevant sections) of documents/publications available within a reasonable timeframe and if resources permit.

The City of Turlock will identify those documents deemed vital and provide translated services, as needed and as described above. 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.

The City of Turlock 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.

The following list identifies the City of Turlock's LEP procedures:

- Major mailers and public information handouts are published in both English and Spanish languages, and can be further translated upon request;
- During the City of Turlock'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;
- All public workshops and hearings are structured to involve citizen participation from all populations, with translation either provided directly by the City of Turlock's 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 the City of Turlock staff to educate its members about the Title VI LEP requirements and how to provide meaningful access to services for LEP individuals.

City of Turlock staff will have knowledge of current areas of LEP groups throughout the City of Turlock and Denair and their language assistance needs. To address potential LEP individuals' needs, informational materials regarding language assistance services will be readily available to City of Turlock 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.

5. Monitor and Evaluate Access to Language Assistance

The City of Turlock will review the Title VI program along with the LEP Plan every three years to ensure reasonable efforts are made to identify and address the needs of LEP individuals within the City of Turlock. This review will include how the City of Turlock handles LEP complaints using the documented Title VI procedures, and potential methods to improve meeting the needs of LEP individuals.

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 the City of Turlock's performance in adhering to the objectives of the LEP plan.

The City of Turlock 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 the City of Turlock.

The City of Turlock 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. The City of Turlock adheres to the equal employment opportunities processes. The City of Turlock intends to take many more proactive steps to further improve the quality of transit service for all residents within the City of Turlock. Furthermore, the City of Turlock 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 the City of Turlock's LEP Plan

The City of Turlock's LEP Plan and Title VI Civil Rights Complaint Procedures are available on the City of Turlock's website at www.turlocktransit.com. Any person or agency with internet access will be able to access and download the plan from the City of Turlock 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 the City of Turlock will provide, if feasible.

Appendix E: Minority Representation on Committees and Councils

Title 49 CFR Section 21.5(b)(1)(vii) states that the recipient of a federal transit grant may not, on the grounds of race, color, or national origin, deny a person the opportunity to participate as a member of a planning, advisory, or similar body which is an integral part of a program.

The City of Turlock does not currently have any committees. However, if committees are established in the future, they will be designed to comply with principles of equity, ensuring that no person is excluded from participation or denied benefits based on discriminatory factors.

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 from LEP residents on transit service developments, and help increase the awareness of the City of Turlock’s services. 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.

Below is a list of outreach activities in which the City of Turlock has participated over the past three years.

Event Name	Date
Stanislaus County Fair	7/7/2022 - 7/17/2022
Turlock Adult School	8/3/2022
Unmet Transit Needs, Public Hearing	2/13/2022
Go Green Week	3/14/2023 - 3/17/2023
Community Awareness Day / Salvation Army	3/18/2023
Stan State Warrior Welcome Event	4/22/2023
Community Engagement Meetings (4)	6/15/2023 & 6/16/2023
Stanislaus County Fair	7/7/2023 - 7/16/2023
National Night Out	8/1/2023
Stan State Student Services Day	8/30/2023
Healthy Aging and Fall Prevention	10/13/2023
Stan State Warrior Expo	10/21/2023
Go Green Week	3/12/2023 - 3/15/2023
Festival on the Green	3/16/2023
Stan State Warrior Welcome Event	4/13/2024
Wakefield Spring Carnival	4/24/2024
Stanislaus County Fair	7/5/2024 - 7/14/2024
Turlock High School Pool Day	7/18/2024
Pitman High School Pool Day	7/25/2024
National Night Out	8/6/2024

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

When the average vehicle loads exceed the stated standards, then additional resources will be deployed to meet the increase in demand.

Vehicle Headway Standards

Weekday	Peak	Base	Evening	Night
Regional Trunk				
Urban Radial	40 min	35 min	30 min	30 min
Cross Town				
Secondary Radial				
Feeder				
Peak Express				
Employer Feeder				

Saturday	Day	Evening	Night
Regional			
Urban Radial	40 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 seven 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 zero minutes early and no more than seven minutes late. The City of Turlock’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	35 minutes	35 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

Title 49 CFR Section 21.5(b)(2) mandates that recipients must not use criteria or administrative methods that result in discrimination based on race, color, or national origin. Similarly, 49 CFR Part 21 stipulates that no individual or group should face discrimination concerning the routing, scheduling, or quality of service due to race, color, or national origin. This includes ensuring that factors such as service frequency, vehicle age and quality, station quality, and route locations are not determined by these discriminatory factors.

In line with these regulations, the City of Turlock evaluates revenue service modifications based on service demand; for fixed route services specifically, as measured by the number of boardings in the affected area. Service modifications at passenger facilities such as the Roger K. Fall Transit Center shall be based on changes necessary to maintain safety, compliance and the performance of service provision objectives. This approach ensures that necessary changes are made to meet demand while adhering to non-discriminatory practices.