



City of Whittier

Transit Services Title VI Program Update

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Greg Alaniz
Director of Parks, Recreation and Community Services
13230 Penn Street
Whittier, CA, 90602
www.whittierprcs.org
(562) 567-9480

This document sets forth policies and procedures to effectively monitor and ensure that Whittier Transit Services are in compliance with Title VI of the Civil Rights Act of 1964 as required by the US Federal Transit Administration.

Whittier Title VI Program Update

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I. INTRODUCTION

The City of Whittier is committed to an atmosphere conducive to community spirit and active participation in the affairs and progress of the community. An essential part of this effort is ensuring all citizens are provided equal access to services and decision-making, without regard to race, color, national origin, sex, age, disability, religion, sexual orientation, gender identity, or any other protected classes enumerated in federal and state laws.

This commitment to inclusion and service is reflected in the Title VI Program of Whittier's Transit Services. The City of Whittier is a recipient of federal funds, distributed by the Federal Transit Administration (FTA), and as such, is required to adhere to Title VI of the Civil Rights Act of 1964. The City's Transit Service division reiterates its commitment to fair and equitable access to services, specifically:

"No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance." (42 U.S.C. 2000d)

To ensure that all residents are given equitable access to Transit Services and that all citizens are provided an opportunity take part in Transit planning and decision-making, the City of Whittier will ensure full compliance with Title VI of the Civil Rights Act of 1964 and executive order 13116.

This update of the City of Whittier's Title VI Update Program Plan has been prepared for the federally funded project known as Dial-A-Ride service. The Plan ensures that the level and quality of Whittier's service is provided in a nondiscriminatory manner and that the opportunity for full and fair participation is offered to all transit users. Additionally, through this program, Whittier has examined the need for services and materials for persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English.

This Title VI Program Plan has been updated in conformance with FTA C 4702.1B (October 1, 2012).

II. TITLE VI GENERAL REQUIREMENTS:

(a) To Notify Beneficiaries of Protection under Title VI:

In order to comply with 49 CFR, Section 21.9(d), the City shall provide information to the public regarding the City's obligations under Department of Transportation's (DOT) Title VI regulations and apprise members of the public of the protections against discrimination afforded to them by Title VI.

The City of Whittier Transit division will inform members of the public of their Title VI protection in a variety of ways, including:

- the Transit Services page of the City's website at www.cityofwhittier.org
- posted notices inside all Dial-A-Ride vehicles; and
- posted notices in public spaces at the Whittier Senior Centers: at Walnut and Parnell Park, where Dial-A-Ride applications are received and cards are purchased.

(b) Develop Title VI Complaint Form and Procedures:

The City of Whittier takes allegations of discrimination of any kind very seriously. Three specific categories of discrimination fall under Federal Title VI regulations: discrimination on the basis of race, color, and national origin. As a recipient of Federal funding, the City is required to develop procedures for investigating and tracking Title VI complaints filed against the City's Transit Services, and to make these procedures for filing a complaint available to the general public.

(c) Record and Report Transit-Related Title VI Investigations, Complaints, and Lawsuits Public Participation Plan:

The City of Whittier maintains a list of complaints, investigations, and lawsuits Title VI investigation, lawsuit or complaint was filed; a summary of the conducted as required by Title VI regulations. This list includes the date that the allegation(s); the status of the investigation, lawsuit or complaint; actions taken by the City of Whittier in response; and final findings related to the investigation, lawsuit, or complaint.

(d) Promote Inclusive Public Participation and Language Assistance:

Transit Services' Public Participation Plan is designed to encourage participation by all Whittier residents in transit planning and services. Whittier Transit Services has used – and will continue to use – a number of avenues to reach the greatest number of residents.

Summary of outreach efforts made since the last Title VI Program submission:

Information on Transit Services is included in each edition of the Recreation Brochure and mailed to every residence in the City. Outreach materials are also made available at the Senior Centers and circulated through the various commissions and committees that serve the elderly and disabled. Transit contact information is included in Senior Center Newsletters, as well, and is also distributed

at senior and housing buildings. Finally, there is a Transit booth at every annual Abilities Awareness Faire within the City of Whittier (the Faire is a free annual event, held in October, for disabled Whittier residents).

(e) Provide Meaningful Access to LEP Persons:

The Language Assistance Plan includes two components, a Title VI Limited English Proficiency Analysis (LEP Analysis) and a Language Assistance Plan. The LEP Analysis is a four factor analysis, which considers:

- the number of LEP persons in the service area;
- the frequency that LEP persons come in contact with transit services;
- the nature and importance of programs, activities, or service to the LEP population; and,
- resources available to the City and the overall costs to provide LEP assistance.

The Language Assistance Plan explains the findings of the Four Factor Analysis and describes how the City will implement language assistance.

(f) Title VI Equity Analysis of Decision Making Bodies:

Major decisions regarding Whittier DAR policy, service changes, fares, and capital expenditures are primarily made by the elected Whittier City Council, after review and recommendations by one or more Council-appointed advisory commissions and committees, as deemed appropriate: Parking and Transportation Commission, Accessibility Committee, Senior Advisory Committee, and occasionally by short-term DAR Focus Groups. Minor decisions or changes may be made administratively by City management staff, with or without input from the above bodies, as deemed appropriate

(g) Oversight Monitoring:

The City of Whittier contracts out for Dial-A-Ride services

(h) Fixed Route System:

None.

(i) Contact:

The City of Whittier's Community Services Manager is available to provide additional information, as needed, and to respond to any verbal or written requests for information in order for FTA to investigate complaints of discrimination or to resolve concerns about possible noncompliance with DOT's Title VI regulations.

(j) City Adopted Resolution

Citywide adoption of Title VI Resolution No. XX

III. NOTICE TO THE PUBLIC

To make Whittier DAR passengers aware of the City's commitment to Title VI compliance, and of their right to file a civil rights complaint, notices in English and Spanish have been posted on the DAR buses, the City of Whittier website, and the Senior Centers.

Website Text

Title VI Non-Discrimination Policy

The City of Whittier is committed to ensuring that no person is excluded from participation in, or denied the benefits of, its transit services or programs on the basis of race, color, national origin, age, sex, or disability as afforded by Title VI of the Civil Rights Act of 1964 as amended.

No person or group of persons will be discriminated against with regard to fares, routing, scheduling, or quality of transportation service, on the basis of race, color, or national origin. Frequency of service, age and quality of transit vehicles assigned to routes, quality of stations and location of routes will not be determined on the basis of race, color, national origin, age, or disability.

The City of Whittier, a federal grant recipient, is required by the FTA to conform to Title VI of the Civil Rights Act of 1964, and its amendments. Therefore, the City of Whittier mission includes equal and equitable access to its programs, activities, and services. For more information about the City of Whittier's Title VI Program, please contact the Title VI Coordinator at (562) 567-9480.

How to File a Complaint

Any person who believes that he/she has been excluded from participation in or denied benefits and services of any programs or activities administered by the City of Whittier, or its consultants and contractors, based on race, color, national origin, sex, age, or disability, may bring forth a complaint of discrimination under Title VI and related statutes. The complaint must be filed within 180 days of the alleged act of discrimination. Provide as much detail as possible, sign the complaint and mail it to:

Title VI Coordinator
13225 Walnut Street
Whittier, CA, 90602
(562) 567-9480

In case the complainant is dissatisfied with the resolution by the City of Whittier, the same complaint may be submitted to the FTA, U.S. DOT Secretary of Transportation, or U.S. Department of Justice (USDOJ). A complainant may also file a Title VI complaint concerning race, color, or national origin discrimination with the FTA:

Federal Transit Administration
Office of Civil Rights
1200 New Jersey Avenue SE
Washington, DC 20590
Title VI Complaint Form

- [Title VI Complaint Form in English](#) (see IV, page 11)
- [Title VI Complaint Form in Spanish](#) (see IV, page 14)

Cómo Presentar una Queja

Si considera que lo han discriminado por su raza, color, país de origen, sexo, edad, discapacidad o condición socioeconómica, puede presentar una denuncia por escrito ante la:

Title VI Coordinator
13225 Walnut Street
Whittier, CA, 90602
(562) 567-9480

La Ciudad se da de una Investigación de Denuncias por Discriminación entre 15 días. A lo menos la denuncia sera completara en 180 días. Para mas informacion in Español o para más información Título VI puede hablar a (562) 567-9480. Estos servicios son gratis.

Cualquier persona que considere que ella o una clase específica de personas ha sufrido discriminación prohibida por el Título VI puede presentar una queja escrita en nombre propio o mediante un representante a ciudad de Whittier o a la oficina de derechos civiles del Departamento Federal de Transporte Público (Federal Transit Administration) (FTA, por sus siglas en inglés):

Federal Transit Administration
Office of Civil Rights
1200 New Jersey Avenue SE
Washington, DC 20590
Title VI Complaint Form

Se debe presentar la queja a más tardar 180 días después de la fecha de la discriminación en cuestión, a menos que el FTA extienda el plazo para presentar la queja.

- [Título VI Público folleto en Español](#) (see IV page 7)
- [Título VI en Español Formulario de Queja](#) (see IV page 14)

Locations Where Title VI Notice is Posted

Uptown Senior Center
13225 Walnut Street
Whittier, CA 90602

Parnell Park Community and Senior Center
15390 Lambert Rd.
Whittier, CA 90604

Vehicle and Senior Center Notice

(Continued on next page)

Public Notice of Rights under Title VI

Whittier Transportation operates its programs and services without regard to race, color or national origin in accordance with Title VI of the Civil Rights Act. (Whittier also prohibits discrimination based on sex, age, disability, religion, sexual orientation, gender identity, or any other protected classes enumerated in federal and state laws.) Any person who believes he/she has been a victim of any unlawful discriminatory practice under Title VI may file a complaint with the Whittier Community Services Manager.

For questions of information regarding Whittier's obligation to non-discrimination practices, or how to file a complaint, please visit the Transit page on the City's website at www.cityofwhittier.org or contact the Transit Services Department.

You may also file a complaint directly with the Federal Transit Administration:

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

To request information in another language please contact: (562) 567-9480

Aviso Público de Derechos bajo el Título VI

Whittier Transportation opera sus programas y servicios, sin distinción de raza, color y origen nacional, en conformidad con Título VI de la Ley de Derechos Civiles. (La ciudad de Whittier también prohíbe la discriminación basada en el sexo, edad, discapacidad, religión, orientación sexual, identidad de género y otras clases protegidas enumeradas en las leyes federales y estatales). Cualquier persona que cree que él o ella ha sido víctima de cualquier práctica discriminatoria ilícita bajo el Título VI puede presentar una queja con el gerente de servicios comunitarios de la ciudad de Whittier.

Si usted tiene cualquier pregunta o desea información adicional sobre la obligación de la ciudad de Whittier con respecto a la política de no discriminación o como presentar una queja, llame a (559) 651-8150 o visita la página web de la ciudad www.cityofwhittier.org o ponerse en contacto con el departamento de tránsito de la ciudad.

También puede presentar una queja directamente con la Administración Federal de Tránsito a:

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

Para información en español por favor llame a (562) 567-9480.

IV. TITLE VI COMPLAINT FORM AND PROCEDURES

City of Whittier Title VI Complaint Procedures

If any individual believes that she or he, or any other program beneficiaries, have been subjected to discrimination on the basis of race, color or national origin, sex, age, disability, religion, sexual orientation, gender identity, or any other protected classes enumerated in federal and state laws, they have the right to file a complaint with the City of Whittier.

(a) Submission of Complaint:

The complainant may file a signed, written complaint up to one hundred and eighty (180) days from the date of the alleged discrimination. The complaint should include the following information:

- the complainant's name, mailing address, and contact information;
- how, when, where and why the complainant believes he or she was discriminated against, including such information as the location, names, and contact information of any witnesses; and,
- all other information deemed significant

A convenient Title VI Complaint Form is available on the Transit page of the City of Whittier website at <https://www.whittierprcs.org/transit/title-vi>. The complaint should be filed with:

Title VI Coordinator
Whittier Senior Center
13225 Walnut Street
Whittier, CA 90602

All complainants are encouraged to send their complaint forms via certified mail through the U.S. Postal Service to ensure the document is received by the Community Services Manager. Alternatively, complainants may hand deliver their complaint forms to the above mentioned address between the hours of 8:00 a.m. to 5:00 p.m. Monday through Friday.

(b) Investigation of Complaints:

Once filed, the Community Services Manager will commence an investigation of the complaint. The investigation may include discussion(s) of the complaint with all affected parties to determine the issue.

The City will commence an investigation within 15 business days of receipt of the complaint.

The City will only investigate complete complaints. If the City requires more information to resolve the case, the City may contact the complainant. The

complainant has 15 business days from the date of the City's request to send requested information to the investigator or request more time to gather the information. If the complainant does not respond to the request within 15 business days, the City can administratively close the case. A case can also be closed if the complainant no longer wishes to pursue their case.

(c) Resolution of Case:

After the investigator reviews the complaint, she/he will issue one of two letters to the complainant: a closure letter or a Letter of Finding (LOF). A closure letter summarizes the allegations and states that there was no Title VI violation and that the case will be closed. An LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member or contractor staff, or other action will occur.

(d) Request for Reconsideration:

The Letter of Finding will also notify the complainant of his/her right to appeal the decision. If the complainant disagrees with the City's or transit provider's findings, the complainant may request reconsideration by submitting a written request to the Director of Parks, Recreation and Community Services within 15 business days of receipt of the City's response. The complainant shall provide a detailed description of the request for consideration. The Director will notify the complainant of his/her decision either to accept or reject the request for reconsideration within 15 business days. If the Director agrees to reconsider the matter, the complaint shall be returned to the investigator for re-evaluation in accordance with the "Investigation of Complaint" procedures described above.

(e) Appeal Process:

If the request for reconsideration is denied, complainant may appeal the Director's response by submitting a written request to the Assistant City Manager for final determination.

(f) Submission of Complaint to the Department of Transportation:

If this is a Title VI complaint (that is, discrimination based on color, race, or national origin), complainant may, at any time, submit the complaint directly to the Department of Transportation for investigation:

Federal Transit Administration
Office of Civil Rights
1200 New Jersey Avenue SE
Washington, DC 20590
Title VI Complaint Form

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

Ensuring Easy Access to Complaint Form and Procedures

The City has developed a Title VI Complaint Form to document all complaints received by City and/or transit contractor staff. This form is available in English and Spanish on the transit page of the City's website, and the Senior Centers, located at:

Uptown Senior Center
13225 Walnut Street
Whittier, CA 90602

Parnell Park Community and Senior Center
15390 Lambert Rd.
Whittier, CA 90604

The form is also available via email or can be mailed upon request.



Transit Services Title VI Complaint Form

As required by the Federal Transit Administration (FTA) and as set forth in Title VI of the Civil Rights Act of 1964:

"No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance." (42 U.S.C. 2000d)

If you believe you have been the target of discrimination on the basis of race, color or national origin, please complete this form in as much detail as possible. This completed form must be submitted within 180 days of the incident. If you need help completing this form for any reason, please contact the Title VI Coordinator at (562) 567-9480.

Section I:	
Name: _____	
Address: _____	
Telephone (Home): _____ Telephone (Cell): _____	
Email Address: _____	
Section II:	
Are you filing this complaint on your own behalf? <input type="checkbox"/> Yes <input type="checkbox"/> No	
If you answered "Yes," go to Section III	
If you answered "No":	
Please supply the name and relationship of the person for whom you are filing this form: _____	
Explain why you have filed for a third party: _____	
Have you obtained the permission of the aggrieved party? <input type="checkbox"/> Yes <input type="checkbox"/> No	

Section III:

I believe the discrimination experienced was based on (check all that apply):

Race Color National Origin

Other* _____

Date of Alleged Discrimination (Month, Day, Year): _____

*Non-Title VI discrimination allegations will be investigated using the same procedures as outlined in the "Title VI Complaint Procedures" document.

(continued on back)

Explain as clearly and completely as possible what happened and why you believe you (or another) were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please attach additional sheets.

Section IV:

Have you previously filed a Title VI complaint with this agency?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
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Section V:

Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court? Yes No

If yes, check all that apply and list the agency's name:

<input type="checkbox"/> Federal Agency _____	<input type="checkbox"/> State Agency _____
<input type="checkbox"/> Federal Court _____	<input type="checkbox"/> State Court _____
<input type="checkbox"/> Local Agency _____	<input type="checkbox"/> Other _____

Please provide information for the contact person at the agency/court(s) where the complaint was filed. (Please attach additional sheets if more than one agency/court.)

Name: _____

Title: _____

Agency: _____

Address: _____

Telephone: _____

Section VI:
Name of Transit Agency complaint is against:
Contact Person:
Telephone:

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

Signature and date are required.

Signature

Date

Please submit this form in person at the address below, or mail this form to:

Title VI Coordinator
Whittier Senior Center
13225 Walnut Street
Whittier, CA 90602



Servicios de Tránsito

Formulario de denuncias en virtud del Título VI

Según lo dispone la Administración Federal de Tránsito (FTA) y según se establece en el Título VI de la Ley de Derechos Civiles de 1964:

“En los Estados Unidos, no se excluirá la participación de ninguna persona en ningún programa o actividad que reciba asistencia financiera federal, ni se le negarán los beneficios de dichos programas o actividades, ni será discriminada en ellos por causa de su raza, color u origen nacional.” (42 U.S.C. 2000d)

Si considera que ha sido objeto de discriminación por motivo de raza, color u origen nacional, llene este formulario con el mayor detalle posible. Este formulario completo se debe presentar antes de transcurrir 180 días desde el incidente. Si necesita ayuda para llenar este formulario por algún motivo, puede comunicarse con su Title VI Coordinator al número (562) 567-9480.

Sección I:	
Nombre: _____	
Domicilio: _____	
Teléfono (casa): _____	Teléfono (celular): _____
Dirección de correo electrónico: _____	
Sección II:	
¿Presenta esta denuncia en su propio nombre? <input type="checkbox"/> Sí <input type="checkbox"/> No	
Si respondió "Sí", siga en la Sección III	
Si respondió "No":	
Escriba el nombre y el parentesco de la persona para quien llena este formulario: _____	
Explique por qué presenta la denuncia por otra persona: _____	
¿Ha obtenido el permiso de la persona afectada? <input type="checkbox"/> Sí <input type="checkbox"/> No	

Sección III:

Considero que la discriminación recibida fue por motivo de (marque todo lo que corresponda):

- Raza Color Origen nacional Otro motivo*

Fecha de la supuesta discriminación (mes, día, año): _____

*Los alegatos de discriminación no correspondientes al Título VI se investigarán con el mismo procedimiento que se describe en el documento de "Procedimientos para presentar denuncias en virtud del Título VI".

(continúa al reverso)

Explique lo más claro y detalladamente posible lo que ocurrió y por qué considera que usted (u otra persona) fue discriminado. Incluya a todas las personas que estuvieron implicadas y el nombre y los datos de contacto de las personas que lo discriminaron (si los conoce) así como los nombres y la información de contacto de todo testigo. Si necesita más espacio puede agregar más hojas.

Sección IV:

¿Ha presentado antes una denuncia en virtud del Título VI con esta agencia?	<input type="checkbox"/> Sí	<input type="checkbox"/> No
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Sección V:

¿Ha presentado esta denuncia en otra agencia federal, estatal o local o en algún tribunal federal o estatal?
 Sí No

De ser así, marque todo lo que corresponda y escriba el nombre de la agencia:

- | | | | |
|---|-------|---|-------|
| <input type="checkbox"/> Agencia federal | _____ | <input type="checkbox"/> Agencia estatal | _____ |
| <input type="checkbox"/> Tribunal federal | _____ | <input type="checkbox"/> Tribunal estatal | _____ |
| <input type="checkbox"/> Agencia local | _____ | <input type="checkbox"/> Otra entidad | _____ |

Escriba los datos de contacto de la persona de la agencia o del tribunal donde se presentó la denuncia. (Si es más de una agencia o tribunal, agregue más hojas.)

Nombre: _____

Cargo: _____

Agencia: _____

Domicilio: _____

Teléfono: _____

Sección VI:

Nombre del Agencia de Transito que denuncia:

Persona de contacto:

Teléfono:

Adjunte todo el material por escrito o la información adicional que considere pertinente a su denuncia. La firma y la fecha son obligatorias.

Firma

Fecha

Presente este formulario en persona en el domicilio que se indica a continuación, o envíelo por correo a:

Title VI Coordinator
Whittier Senior Center
13225 Walnut St.
Whittier, CA 90602

V. TITLE VI INVESTIGATIONS, COMPLAINTS, AND LAWSUITS

As of November 12, 2019 there are no Title VI investigations, complaints or lawsuits active or pending with the City of Whittier.

City of Whittier

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

Complaints				
Date Complaint Received	Type of Alleged Discrimination	Name of Complainant	Status	Action Taken
N/A				

Investigations				
Date Investigation Commenced	Type of Alleged Discrimination	Name of Target of Alleged Discrimination	Status	Resolution/Action Taken
N/A				

Lawsuits				
Date Lawsuit Filed	Type of Alleged Discrimination	Name of Person who Filed Suit	Status	Resolution
N/A				

VI. PUBLIC PARTICIPATION PLAN

CITY OF WHITTIER PUBLIC PARTICIPATION PLAN July 2019

Introduction

The City of Whittier's transit Public Participation Plan is designed to help ensure that no one is prevented from participating in key issues in Whittier's transportation planning efforts, such as fare increases or service modifications. The goal is to bring all stakeholders into the decision-making process so the City Council can make an informed decision in regards to the City's transit services.

General Public Outreach Activities

The City plans to continue its engagement in direct outreach with the community through the dissemination of flyers, local newspaper advertisements, published articles to the City's website, and visibility at local events.

Fliers, Brochures and Mailings

Brochures for Dial-A-Ride (English and Spanish) are distributed at various sites throughout the City, including senior and community centers. Information on DAR is also included in the Senior Center newsletter and in the Whittier Recreation brochure that is mailed to all City residents.

Community Partners

Stakeholders are those who are either directly or indirectly affected by a plan, or the recommendations of that plan. Those who may be adversely affected, or who may be denied benefit of a plan's recommendation(s), are of particular interest in the identification of specific stakeholders. Stakeholders can come from a number of groups including the DAR passenger base, which includes minority and low-income residents; senior housing complexes, convalescent hospitals and assisted living facilities; public agencies; and private organizations which serve the DAR passenger base. Depending upon the matter being considered, the stakeholders contacted may vary.

The Transit division participates on the advisory boards and committees of other city programs and offices, including:

- Whittier Accessibility Committee —which advises the City on issues affecting residents with physical or developmental challenges;
- Whittier Senior Center Advisory Committee —which advises the City on issues affecting older adults;
- Parking and Transportation Commission —which is responsible for city transportation infrastructure planning (e.g. streets, curb cuts, parking structures, etc.); and,
- Social Services Commission —which oversees the Accessibility and Senior Center Committees.

While these groups have no authority over transit planning or services, they nevertheless focus on groups which represent the principal demographics of DAR service patrons and are a valuable source of advice.

In addition, there is the occasional establishment of short-term citizens' DAR Focus Groups and rider surveys to solicit suggestions and input on system improvement. All riders are invited to participate in committee meetings, focus groups, and surveys.

Stakeholders and other interested local agencies may request that a speaker from Whittier DAR make a presentation by contacting the Transit Office at (562) 567-9480.

Meetings

Meetings are held at Americans with Disabilities Act (ADA) accessible locations, at various times, to ensure meetings are accessible and open to all, regardless of disability or income.

When the City is proposing a material change to the transportation services, including:

- A change in DAR service hours and/or days
- A fare increase or significant change in the method of fare payment
- Changes in passenger eligibility
- Permanent route adjustments
- Substantial service modifications

Staff will inform the public of the proposed changes with a minimum of 30 days, and up to four months' notice, depending on the level of service change. As such, the City will continue its current notification outreach efforts; specifically, distributing notices to all riders and posting signs in all service vehicles.

Whenever possible, staff prepare accessible documents and schedules for meetings where the target audience is expected to include LEP individuals. Meeting notices, flyers, and agendas are made available in Spanish based on resources. Spanish interpretation is also available upon request for meetings open to public comment, on issues relating to transit services. In addition, every effort is made to have bilingual staff available at public meetings.

Incorporating Public Comments

All comments received through the public participation plan are given careful and thoughtful consideration. Because there are a number of different ways passengers or members of the community can comment on proposed service or fare changes (mail, e-mail, social media, public meetings and others), all comments are assembled into a single document for presentation to the City Council and other advisory bodies discussed above for consideration.

Assurances

The City of Whittier, and its transit contract provider, will ensure that no person, on the grounds of race, color or national origin —stated in Title VI of the Civil Rights Act of 1964— is excluded from participation in, or denied the benefits of, the use of transportation services. Further, the City will notify the public of protections against discrimination afforded them by Title VI Regulations, and will take preventive corrective and disciplinary action necessary to stem behavior that violates the rights and privileges these regulations are designed to protect. The City will post this information on its web site and ensure that it reflects up to date information, consistent with the requirements of Title VI and Executive Order 13116.

The City's Title VI Plan and Procedures, as well as the Language Assistance Plan, are available on the City of Whittier's website at www.cityofwhittier.org. Any person or agency with internet access will be able to access and download the plan from the City's website. Alternatively, any person or agency may request a copy of the plan via email, standard mail, or in person, and will be provided a copy of the plan at no cost.

Questions or comments regarding the Title VI or Language Assistance Plan may be submitted to:

Title VI Coordinator
Whittier Senior Center
13225 Walnut St.
Whittier, CA 90602
(562) 567-9480

VII. LIMITED ENGLISH PROFICIENCY (LEP) PLAN

CITY OF WHITTIER TRANSIT SERVICES TITLE VI LANGUAGE ASSISTANCE PLAN July 2019

Introduction

The Language Assistance Plan has been prepared to address the City of Whittier's responsibilities as a sub-recipient of federal financial assistance as they relate to the needs of individuals with limited English language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, and Federal Transit Circular 4702.1B, which state that no person shall be subject to discrimination on the basis of color, race, or national origin. In addition, Executive Order 13166, titled "Improving Access to Services for Persons with Limited English Proficiency," indicates that differing treatment based upon a person's inability to speak, read, write, or understand English is a form of national origin discrimination. It directs each federal agency to publish guidance for its respective recipients, clarifying their obligation to ensure that such discrimination does not take place. This order applies to all State and local agencies that receive federal funding.

Background

The City of Whittier's Transit Service staff oversee Dial-A-Ride (DAR), a demand-responsive program serving seniors and disabled residents of Whittier. A supplemental service, DAR Plus, provides rides for existing DAR patrons to travel to medical appointments in specific areas/destinations outside the city of Whittier.

The Whittier City Council is the policymaking body of the system. The Council makes decisions based on advice received from the public, the City's departments, advisory boards, and commissions.

The City of Whittier's Transit Services has developed this Language Assistance Plan to help identify reasonable steps for providing language assistance to persons with limited English proficiency that wish to access these transportation services. As defined by Executive Order 13166, LEP persons are those who do not speak English as their primary language and/or understand English "less than very well."

This plan outlines ways to identify a person who may need language assistance, the ways in which assistance may be provided, and how to notify LEP persons that assistance is available. In order to prepare this plan, City of Whittier's transit staff performed the U.S. Department of Transportation's four-factor LEP analysis, which considers the following factors:

1. The number or proportion of LEP persons in the service area who may be served or are likely to encounter the City of Whittier's transportation programs, activities, or services.
2. The frequency with which LEP persons come in contact with City of Whittier transportation programs, activities, or services.

3. The nature and importance of programs, activities, or services provided by the City of Whittier transportation services to the LEP population.
4. Resources available to the City of Whittier Transit Services staff and overall cost to provide LEP assistance.

Four-Factor Analysis

Factor 1: Number of LEP Persons in Service Region

City of Whittier staff reviewed 2017 ACS data from the United States Census Bureau and determined that 12.5% (10,633) of the City's total population (86,852) speaks English "less than very well."

LEP Spanish speakers account for 10.5% (9,086) of the City's population, and therefore, qualify for inclusion under the "safe harbor" guidelines. Remaining languages have 1,547 LEP members combined, falling below the "safe harbor" threshold. The City will not include them in the current Language Assistance Plan. However, the City will monitor demographic trends using data from the U.S. Census Bureau, and survey frontline staff on changing language needs for patrons of the City's transportation program.

The need to provide language services to the Spanish-speaking population who use Whittier's DAR is demonstrated by the percentage above. The following table indicates the breakdown of LEP communities, including those who fall below the "safe harbor" threshold.

Table 1. LEP Communities Residing in City of Whittier

LANGUAGE	TOTAL NUMBER	PERCENTAGE
Spanish	9,086	10.5%
Other Indo-European	267	.3%
Asian	979	1.1%
Other	301	.3%

Source: U.S. Census; American Community Survey. Aug. 2019.

Factor 2: Frequency of LEP Use

Many Spanish speakers come into contact with the City's DAR program. Contractor staff (drivers and dispatchers) and City office staff report that approximately 12% of customers are bilingual Spanish speakers. Fluent, bilingual staff are available at the City office for LEP patrons. A significant number of contractor staff is also bilingual or knows some Spanish. Oftentimes, communication is conducted in Spanish, even when customers speak sufficient English. Thus, it is difficult to determine when bilingual communication is necessary, or simply preferred, by the patron. Drivers and dispatchers also report that, in their experience, Spanish speaking LEP customers understand enough English to effectively use services (in comparison with other non-Spanish language groups).

Points of contact include the actual use of the service, calls to customer service representatives and ride dispatchers, and Whittier DAR informational materials. An important part of the development of Whittier DAR's Language Access Plan is the assessment of major points of contact, including:

- The use of the Whittier DAR service (on-board signage, announcements and driver language skills)
- Communication with Whittier DAR's customer service staff and ride dispatchers
- Purchase of Whittier DAR passes
- Printed informational materials
- Web-based informational materials
- Public meetings

The comments obtained from the above locations have results in the compilation of a list of the most frequent requests made by Whittier DAR LEP passengers. These requests include:

- Making a DAR reservation
- Fare information
- General information regarding the Whittier DAR service
- Help with boarding a DAR vehicle and fastening the seatbelt
- Help with shopping bags
- Help with a cane, walker, or mobility device
- Street or venue location (directions)

Factor 3: Importance of the Whittier DAR Service to People's Lives

City of Whittier DAR serves two of the most vulnerable populations –the elderly and disabled. A recent review of DAR data determined that common destinations for patrons include medical appointments, social services programs, senior centers, and religious sites. Grocery shopping is another frequent destination for DAR riders. These destinations are critical for any individual living independently. Transit staff and contractors are trained to serve these populations, including LEP individuals.

In the event that limited English becomes a barrier to the use of services, the City of Whittier developed its Language Assistance Plan (outlined in the following section), based on the four-factor analysis.

Factor 4: Resources and Costs for LEP Assistance.

A significant number of City staff are bilingual English/Spanish speakers, and provide a critical resource for serving LEP Spanish speakers. In addition, MV Transportation (the DAR contract provider) readily serves Spanish-speaking clients in Whittier and the surrounding cities of Los Angeles. A small amount of additional staff time will ensure that bilingual interpreters are available to assist LEP individuals at public hearings, transit focus groups, and in other spaces. A number of organizations and nonprofits in

Whittier also provide services in English and Spanish, aiding in outreach and access to services.

Whittier DAR has also committed resources in order to improve access to its services and programs for LEP persons. Bilingual information (English/Spanish) is distributed in an extensive number of mediums including:

- Access to Spanish translation on the City website
- Bilingual English/Spanish informational materials
- Bilingual English/Spanish customer service representatives
- Bilingual English/Spanish dispatchers
- Bilingual English/Spanish on-board signage
- Bilingual English/Spanish regional bus agency timetables posted at bus shelters within the City of Whittier

Language Assistance Plan

Identification of LEP Population

Whittier Transit Services has developed several ways to assist in identifying LEP populations within the City, including:

- Examining records and tracking requests for language assistance at meetings, etc.; reading suggestion comments; and monitoring telephone and in person communications.
- Conducting annual surveys and collecting data from Transit staff of LEP needs and/or issues.
- Engaging in continued community outreach, including collaboration with organizations and agencies to regularly assess and update the needs of LEP persons in the City.
- Having City staff greet participants as they arrive at events and meetings sponsored by the City's Transit Services, and informally engaging participants in conversation when it is possible to identify LEP individuals who may need language services.
- Examine U.S. Census Bureau (Census) population numbers of those who report a primary language other than English and compare that to Census block data and map communities accordingly to determine high concentrations of LEP populations

Language Assistance Measures

The Spanish-speaking population has had a significant presence in the City's transportation service area for a long time; therefore, it has been important to offer materials in formats that are easily understood by this population, including:

- Dial-A-Ride Applications and Service Brochures, available in English and Spanish

- Whenever possible, ensuring that at least one DAR reservationist on duty is bilingual in Spanish/English. In the rare occasion that a bilingual reservationist is not available, staff will have sufficient training and Spanish comprehension to effectively handle calls. (Whittier has had no reports of LEP Spanish speakers being unable to schedule the rides they need.)

Staff Training

All City of Whittier transit staff will be provided with the LEP plan and will be educated on procedures and services available to them to assist our LEP DAR riders. The training will take place during the initial induction of new employees and once a year for existing employees in December. All training topics are listed below:

- Understanding the Title VI LEP responsibilities
- What language assistance services the City of Whittier offers
- How to identify LEP individuals in public meetings
- How to access an interpreter
- Documentation of language assistance requests
- How to handle a complaint

Currently, 9 out of 14 drivers speak some Spanish (4 are fluent). All have enough training to effectively interact with LEP Spanish riders. Similarly, many other Transit and Senior Center staff are fluent in Spanish; those that are not have sufficient Spanish to serve LEP Spanish callers.

There are various ways in which the City's Transit Services staff responds to LEP persons (whether in person, by telephone, or in writing), these include:

- As resources allow, the City will have bilingual Spanish/English staff at Transit booths at community events and at Transit focus groups. The City will also make every effort to have bilingual staff made available to community nonprofit and social services groups for informational presentations.
- Printed vital documents, including DAR service information brochures and applications, Title VI notification of Rights, and Title VI Complaint Forms, are available in English and Spanish on the City Website. (These will be replaced with new versions by February 1, 2020 after the new plan is approved.)
- Notices of substantial service changes, including fare increases and permanent route changes, will be posted in English and Spanish (on the schedule and in the locations indicated in the "Public Participation" section).
- Annual survey of drivers and other frontline staff, like dispatchers and DAR schedulers, on their experience concerning any contacts with LEP persons during the previous year, to see if additional language assistance measures are needed.
- Posting of the City of Whittier's Title VI Policy and Language Assistance Plan on the City's website at www.cityofwhittier.org.
- Spanish translators will continue be available at Whittier City Council Meetings upon request.

Transit Services will remind staff about existing programs and policies relating to language assistance annually and will include this information in all new staff training.

Dissemination of the City of Whittier Limited English Proficiency Plan

The City of Whittier will post the LEP Plan on its website at www.cityofwhittier.org. The LEP Plan can also be found in the Transit Office and the Whittier library.

Any person, including social services, non-profits, law enforcement agencies, and other community members with internet access will be able to access the plan. For those without personal internet service, Whittier libraries offer free internet access. A hard copy of the LEP Plan will be provided to any person or agency upon request. Persons with LEP may also obtain translations of this plan upon request. Any questions or comments regarding this plan should be directed to the City of Whittier Title VI Coordinator.

Monitoring and Updating the Language Assistance Plan

The City of Whittier will update the Language Assistance Plan, as required by the U.S. DOT, when it is clear that higher concentrations of LEP individuals are present in the City's transit service area. Updates to the Language Assistance Plan will consider:

- how the needs of LEP persons have been addressed;
- the current LEP population in the service area;
- determination as to whether the need for translation services has changed; and,
- whether complaints have been received concerning the City's failure to meet the needs of LEP individuals.

VIII. TITLE VI EQUITY ANALYSIS AND DECISION MAKING BODIES

The current racial breakdown of the governing and advisory bodies is provided below. To encourage that the racial breakdown of the committees is representative of the racial demographics of the City of Whittier, the percentage of the racial breakdown and Title VI compliance guidance will be provided to the appointing jurisdiction when a seat becomes vacant. This will allow them to make an informed decision.

Table 2. Racial Breakdown of Decision Making Bodies

NAME OF BODY	WHITE	HISPANIC	OTHER
Parking & Transportation Commission (5 members)	1	3	1
Accessibility Committee (7 members)	6	1	0
Senior Advisory Committee (9 members)	5	3	1 vacancy

IX. OVERSIGHT MONITORING

The City of Whittier contracts out for the DAR service operation to a private transportation company. The City will monitor their performance monthly.

X. FIXED-ROUTE SYSTEM

The City of Whittier does not currently operate a fixed-route service, therefore, the determination of site or location of facilities does not apply.

XI. CONTACT INFORMATION

Martin Browne
 Title VI Coordinator
 13225 Walnut Street
 Whittier, CA, 90602
 (562) 567-9480
www.whittierprcs.org
 E-mail: mbrowne@cityofwhittier.org