California Vanpool Authority

Public Vanpools Leading The Way

TITLE VI PROGRAM

Developed: June 11, 2015
Approved by California Vanpool Authority Board of Directors:

1340 North Drive
Hanford, CA 93230
Contact: Ronald Hughes, Executive Director
(559) 852-2696
CalVans.org

INTRODUCTION

This document was prepared by California Vanpool Authority to comply with Title VI of the Civil Rights Act of 1964, including new provisions detailed in U.S. Department of Transportation's FTA Circular 4702.1B, "Title VI Requirement and Guidelines for Federal Transit Administration Recipients."
# Table of Contents

<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Title VI Notice to the Public</td>
<td>Pg. 3</td>
</tr>
<tr>
<td>List of Locations Where Title VI Notice Is Posted</td>
<td>Pg. 5</td>
</tr>
<tr>
<td>Title VI Complaint Procedures</td>
<td>Pg. 6</td>
</tr>
<tr>
<td>Title VI Complaint Form</td>
<td>Pg. 7</td>
</tr>
<tr>
<td>List of Transit-Related Title VI Investigations, Complaints, and Lawsuits</td>
<td>Pg. 12</td>
</tr>
<tr>
<td>Public Participation Plan</td>
<td>Pg. 13</td>
</tr>
<tr>
<td>Summary of Outreach Efforts Made Since 2009 Title VI Submission</td>
<td>Pg. 13</td>
</tr>
<tr>
<td>Language Assistance Plan</td>
<td>Pg. 15</td>
</tr>
<tr>
<td>Table Depicting the Membership of Non-Elected Committees And Councils</td>
<td>Pg. 23</td>
</tr>
<tr>
<td>Title VI Equity Analysis</td>
<td>Pg. 23</td>
</tr>
<tr>
<td>Board of Directors Approval of Title VI Program</td>
<td>Pg. 24</td>
</tr>
</tbody>
</table>

Updated: 8/13/2018
California Vanpool Authority

Notifying the Public of Rights Under Title VI

California Vanpool Authority

- California Vanpool Authority operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with California Vanpool Authority.

- For more information on California Vanpool Authority civil rights program, and the procedures to file a complaint, contact California Vanpool Authority, or visit our administrative office at 1340 North Drive, Hanford CA 93230. For more information you may also email ron.hughes@co.kings.ca.us.

- A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590

- If information is needed in another language, contact The California Vanpool Authority Office at (559) 852-2696.
Notificar al público de los derechos bajo el título VI

California Vanpool Authority

- California Vanpool Authority opera sus programas y servicios sin respecto a raza, color y origen nacional con arreglo al título VI de la Civil Ley de derechos. Cualquier persona que cree que él o ella ha sido agraviado por cualquier práctica discriminatoria ilegal bajo el título VI puede presentar una queja con Your California Vanpool Authority.

- Para obtener más información sobre el programa derechos civiles capaz de industrias y el procedimientos para presentar una queja, llame al (559) 651-8150, o visite nuestra oficina administrativa en 1340 North Drive, Hanford, CA 93230. Para más información información, visite ron.hughes@co.kings.ca.us.

- Un demandante puede presentar una queja directamente con el Federal Transita Administración por archivar una queja con la Office of Civil Rights, Atención: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.

- Si se necesita información en otro idioma, contacte al (559) 852-2696.
List of Locations Where Title VI Notice Is Posted

California Vanpool Authority notice to the public is currently posted at the following locations:

<table>
<thead>
<tr>
<th>Location Name</th>
<th>Address</th>
<th>City</th>
</tr>
</thead>
<tbody>
<tr>
<td>CalVans office</td>
<td>1340 North Drive</td>
<td>Hanford</td>
</tr>
<tr>
<td>CalVans office</td>
<td>1684 Callen Road, Unit B</td>
<td>Ventura</td>
</tr>
<tr>
<td>CalVans office</td>
<td>42281 Patricia Lane</td>
<td>Greenfield</td>
</tr>
<tr>
<td>CalVans office</td>
<td>260 N.San Antonio Rd., Suite B</td>
<td>Santa Barbara</td>
</tr>
<tr>
<td>CalVans office</td>
<td>101 East Main Street</td>
<td>Heber</td>
</tr>
</tbody>
</table>

The Title VI notice and program information is also provided on California Vanpool Authority website at [http://www.calvans.org/](http://www.calvans.org/)

Updated: 8/13/2018
Title VI Complaint Procedures

As a recipient of federal dollars, California Vanpool Authority is required to comply with Title VI of the Civil Rights Act of 1964 and ensure that services and benefits are provided on a non-discriminatory basis. California Vanpool Authority has in place a Title VI Complaint Procedure, which outlines a process for local disposition of Title VI complaints and is consistent with guidelines found in the Federal Transit Administration Circular 4702.1B, dated October 1, 2012.

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

Within 10 business days of receiving the complaint, California Vanpool Authority will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office. California Vanpool Authority has 30 days to investigate the complaint. The complainant will be notified in writing of the cause to any planned extension to the 30-day rule.

If more information is needed to resolve the case, California Vanpool Authority may contact the complainant. The complainant has 10 business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within 10 business days California Vanpool Authority can administratively close the case.

A case can be administratively closed also if the complainant no longer wishes to pursue their case. After the investigator reviews the complaint, she/he will issue one of two letters to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. An LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member, or other action will occur. If the complainant wishes to appeal the decision, she/he has 10 business days after the date of the letter or the LOF to do so.

A person may also file a complaint directly with the Federal Transit Administration, at FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.
California Vanpool Authority Title VI Complaint Form

**COMPLAINT FORM**

**Section I: Please write legibly**

| 1. Name: |  |
|  |  |
| 2. Address: |  |
|  |  |
| 3. Telephone: | 3.a. Secondary Phone *(Optional)*: |
|  |  |
| 4. Email Address: |  |
|  |  |

**Section II:**

| 5. Accessible Format Requirements? | [ ] Large Print | [ ] Audio Tape |
|  | [ ] TDD | [ ] Other |

**6. Are your filing this complaint on your own behalf?**

| YES* | NO |

*If you answered “yes” to #6, go to Section III.

7. If you answered “no” to #6, what is the name of the person for whom you are filing this complaint? Name:

8. What is your relationship with this individual:

9. Please explain why you have filed for a third party:

10. Please confirm that you have obtained permission of the aggrieved party to file on their behalf.

| YES | NO |

**Section III:**

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

| [ ] Race | [ ] Color | [ ] National Origin |

12. Date of alleged discrimination: *(mm/dd/yyyy)*

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

Updated: 8/13/2018
COMPLAINT FORM

Section IV:

14. Have you previously filed a Title VI complaint with California Vanpool Authority? YES NO

Section V:

15. Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?
[ ] YES* [ ] NO
If yes, check all that apply:
[ ] Federal Agency ________________________ [ ] State Agency ________________________
[ ] Federal Court ________________________ [ ] Local Agency ________________________
[ ] State Court ________________________

16. If you answered "yes" to #15, provide information about a contact person at the agency/court where the complaint was filed.
Name:
Title:
Agency:
Address:
Telephone: Email:

Section VI:

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

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

Signature and date are required below to complete form:

Signature _________________________________ Date ___________________

Please submit this form in person or mail this form to the address below:
California Vanpool Authority, Title VI Coordinator Ronald Hughes
1340 North Drive
Hanford, CA 93230

Updated: 8/13/2018
Procedimientos de Reclamación Titulo VI

Como beneficiador de fondos federales, California Vanpool Authority es requerido a cumplir con el Titulo VI del Acta Civil de Derechos del año 1964 y asegurar que los servicios y beneficios sean proveídos en manera sin discriminación. California Vanpool Authority tiene en su lugar el Procedimiento Titulo VI, el cual explica el proceso de disposición local de reclamaciones y es consistente con las guías encontradas en la Administración de Transito Federal, Circular 4702.1B, establecidas en Octubre 1, 2012.

Cualquier persona siendo mujer o hombre que haya ha sido discriminado en contra, basado en términos de raza, color, o origen nacional por California Vanpool Authority puede clasificar una queja Titulo VI por medio de completar y someter esta forma. California Vanpool Authority se encarga de investigar reclamaciones recibidas no más de 180 días después que el incidente haiga ocurrido. California Vanpool Authority solo procesara las reclamaciones con formas completas.

Dentro de diez días de haber recibido su reclamación, California Vanpool Authority revisara su caso para determinar si nuestra oficina tiene jurisdicción. El querellante recibirá una carta para informale si su reclamación será investigada por nuestra oficina. California Vanpool Authority tiene 30 días para investigar su reclamación. Si acaso ay alguna razón que necesitamos mas de 30 días, una notificación será enviada directamente al querellante.

Si necesitamos más información para investigar, California Vanpool Authority el querellante será contactado por carta. El querellante tendrá diez días para responder, desde la fecha que se mando la carta pidiendo información adicional. Si el investigador nos es contactado por el querellante dentro los diez días, o ninguna información adicional es recibida California Vanpool Authority tiene el derecho administrador para cerrar su caso.

Un caso puede ser cerrado administrativamente si el querellante desea no continuar con su caso. Después que el investigador haya revisado la reclamación, el o ella emitirá una de dos cartas al querellante: una carta de conclusión o una carta de proceder.

Una carta de conclusión resume las alegaciones y específica que no hubo una violación bajo el Titulo VI y que el caso se cerrara.

Una carta de procedimiento resume las alegaciones y entrevistas de acuerdo al presunto incidente, y explica si una acción disciplinaria, entrenamiento adicional del miembro, u otra acción se llevara acabo.

Si el querellante desea apelar la decisión, el/ella tiene diez días después de la fecha escrita en la carta para hacerlo.

Cualquier persona puede clasificar una queja directamente con La Administración Federal de Transito, localizada en 1200 New Jersey Avenue SE, Washington, DC 20590.
**FORMA DE RECLAMACIÓN**

**Sección I:** *Por favor escriba legible*

1. Nombre: 

2. Dirección: 

3. Teléfono: 

3.a. Teléfono secundario *(Opcional)*: 

4. Email: 

5. ¿Algun requisito formato accesible?  
   [ ] Letra grande  
   [ ] Audio Tape  
   [ ] TDD  
   [ ] Otro  

**Sección II:**

6. ¿Esta presentando esta queja en su propio nombre?  
   SI*  
   NO  

*Si contesto “sí” al #6, llene la Sección III. 

7. Si contesto “no” al #6, ¿Cuál es el nombre de la persona que usted esta presentando esta queja?  
   Nombre: 

8. ¿Cuál es su relación con esta persona?: 

9. Por favor explique porque esta llenando esta reclamación por esta persona: 

10. Por favor, confirme que ha obtenido el permiso de parte de esta persona para presentar en su nombre.  
    SI  
    NO  

**Sección III:**

11. Creo que la discriminación que he experimentado se baso en *(anote lo aplicable)*:  
    [ ] Raza  
    [ ] Color  
    [ ] Origen  

12. Fecha cual ocurrió el incidente de discriminación: *(mm/dd/yyyy)* 

13. Por favor explique lo que ocurrió y porque cree que usted fue discriminado. Describa las personas que fueron involucradas. Incluya el nombre de la persona o personas que lo discriminaron (si es conocido/a), también incluya nombres y información de contacto de cualquier testigo. Si acaso necesita mas espacio de lo que esta en esta forma, puede añadir páginas extras para seguir explicando.
FORMA DE RECLAMACION

Sección IV:

14. ¿Anteriormente ha usted clasificado una queja Titulo VI con California Vanpool Authority?  SI  NO

Sección V:

15. ¿Anteriormente ha usted clasificado esta queja con otra agencia del Estado, Federal, o local, o con cualquier corte del Estado o Federal?

[ ] SI*    [ ] NO
Si su respuesta es SI, anote lo que aplica:

[ ] Agencia Federal ________________________________  [ ] Agencia Estatal

[ ] Corte Federal ________________________________  [ ] Agencia Local

[ ] Corte Estatal ________________________________

16. Si su respuesta fue “sí” al #15, Por favor provea la información de contacto de la persona trabajando en la agencia o corte donde se clasificó la reclamación.

Nombre:

Título:

Agencia:

Dirección:

Teléfono:  Email:

Sección VI:

Nombre de la Agencia de Transito la cual fue la que en contra:

Nombre del Contacto:

Teléfono:

Puede adjuntar cualquier material escrito o cualquier otra información que usted piensa que es relevante para su reclamación.

Firma y fecha es necesaria para que esta forma sea completa.

FIRMA ________________________________  FECHA ________________________________

Por favor de someter esta forma en persona o por correo a la dirección debajo:
California Vanpool Authority, Titulo VI Coordinador Ronald Hughes
1340 North Drive

Updated: 8/13/2018
List of Transit-Related Title VI Investigations, Complaints, and Lawsuits

California Vanpool Authority has not been involved in any transportation-related Title VI investigations, lawsuits or complaints.

California Vanpool Authority List of Investigations, Lawsuits and Complaints

<table>
<thead>
<tr>
<th>Type of Process</th>
<th>Date</th>
<th>Summary (including basis of complaint)</th>
<th>Status</th>
<th>Action(s) Taken</th>
</tr>
</thead>
<tbody>
<tr>
<td>Investigations</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1. None</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Lawsuits</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1. None</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Complaints</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1. None</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Public Participation Plan

About California Vanpool Authority

California Vanpool Authority is a public transit agency formed as a Joint Powers Agency representing 10 Council of Governments or Regional Planning Agency formed for the purpose of providing vanpool services to residents and business of member agencies. As a public agency California Vanpool Authority tracks and reports all vanpool trip information to appropriate government authorities. California Vanpool Authority Staff work with member agencies and local organizations to promote the project.

Many vanpool participants are residents from low income communities that the vanpool program does or could serve. The service provides the residents the ability to access employment opportunities that they may not otherwise be able to access. The agency does make presentations at groups when invited. These groups range from City Councils to Hispanic support groups. Some of these are opportunities for public engagement as outlined below.

purposes of this plan

Public participation is the process through which stakeholders can partake directly in agency decision-making, and express their concerns, desires, and values. It is the mission of this agency to "improve the lives of people with disabilities by creating opportunities to maximize their independence." At every opportunity through prescribed methods the agency will solicit input from stakeholders in order to best support persons served without creating disproportionately high and adverse human health or environmental effects on minority and/or low-income populations.

Summary of Outreach Efforts

The following is a summary of outreach efforts conducted by California Vanpool Authority as they relate to Title VI requirements under the Public Participation Plan. Many of our activities are conducted in partnership or ad hoc outreach with other service organizations and non-profit agencies within the community. This is in no way a complete list but rather documents the agency's outreach efforts as they relate specifically to minority and low-income populations.

Board Meetings Open to the Public
California Vanpool Authority monthly Board meetings are open to the public and announced on the agency's website. The public meeting are conducted through a conference call with Board or Staff members at the following locations. The public can attend at any of these locations.

- Association of Monterey Bay Area Governments, 147 Fourth Street, Community Room, Gonzales, CA 93936
- California Vanpool Authority office at 1340 North Drive, Hanford CA 03230
- Fresno Council of Governments, Huron City Hall, Council Chambers, 36311 Lassen Avenue, Huron, CA 93234

Updated: 8/13/2018
California Vanpool Authority
Title VI Program

- Imperial County Transportation Commission, 1405 N Imperial Ave, Suite 1, El Centro, CA 92243 and 128 Heffeman Ave., Calexico, CA 92231
- Kern Council of Governments, Conference 1401 19th Street, Board Room, Bakersfield, CA 93301, and 3000 W Cecil Avenue, Delano, CA 93216
- Madera County Transportation Commission, Citizens Business Bank, Room 101, 2001 Howard Road, Madera, CA 93637
- Merced County Association of Governments, Conference Room, 369 West 18th Street, Merced, CA 95340
- Santa Barbara County Association of Governments, Solvang City Hall, 1644 Oak Street Solvang, Ca. 93463
- Tulare County Association of Governments, Porterville City Hall, 291 North Main, Porterville, CA 93257
- Ventura County Transportation Commission, Conference Room, 950 County Square Drive, Suite 108, Ventura, CA 93003

Staff for each of the 10 organizations forming California Vanpool Authority participate in the outreach and promotion of the program. This helps to promote and advertise the program in their jurisdictions.

The following are some of the meetings or events California Vanpool Authority attend or participate in that help to promote the service being provided:

Kern County of Governments:
- etrip coordinators meeting: meet with the company etrip coordinators and disperse details about the different ridesharing options that we have available and how they work.

IRS
- Routinely meet with IRS staff to promote ridesharing opportunities.

Measure C
- Participate in outreach activities to promote Measure C to ridesharing opportunities to Fresno County residents.

Caterpillar Inc.
- Conducted a meeting with employees of Caterpillar to promote ridesharing opportunities.

Tulare County Health Fair
- Participate in annual Tulare County Health Fair to promote ridesharing opportunities to Tulare County employees.

Fresno County Health Fair
- Participate in the Fresno County Health Fair to promote ridesharing opportunities to Fresno County employees.

Taft College
- Promote ridesharing opportunities to Taft College students through meeting in Shafter as well as on campus.

Tune In & Tune Up
- Numerous outreach events in the Central Valley to promote clean air to the residents of Turlock, Lemoore, Los Banos, Tulare, Bakersfield, Fresno and the surrounding communities.

Brake Parts
- Meeting to promote ridesharing opportunities to Brake Parts Inc. employees.

Annual Green Summit

Updated: 8/13/2018
Participate in the Annual Green Summit in Reedley College to promote green awareness to college students and the surrounding communities.

**Vanpool workshops in Tulare County**
Conduct workshop to promote ridesharing opportunities for Tulare County employees traveling from the different communities in the valley.

**Meeting with various Contractors/Growers**
Staff conducts ongoing outreaches with individuals and companies wanting to know how the vanpool works for those working in the fields or on a farm.

**Kiwanis Club**
California Vanpool Authority maintains an on-going partnership with the Hanford Noon Kiwanis Club to provide coordinated transportation assistance via the agency's FTA 5310 vehicle. Additionally, several members of the California Vanpool Authority staff maintain membership with the Kiwanis Club, which serves low-income and minority populations.

**California Vanpool Authority Website**
Currently, California Vanpool Authority posts notices and announcement on the agency's website. Additional public input can be obtained by the Title VI Complaint Form, which is available as a download in English and Spanish.

---

**Language Assistance Plan**

**Overview**
The first section in this document describes the purpose of the Language Assistance Plan (LAP). The second section in this document provides the four-factor Limited English Proficient (LEP) analysis (as outlined by the Department of Transportation (DOT)) used to identify LEP needs and assistance measures. The four-factor LEP analysis includes:

- **Factor 1**: The number or proportion of LEP persons in the service area who may be served or are likely to encounter the Life Skills Learning Center program, activity or service.
- **Factor 2**: The frequency with which LEP persons come in contact with the Life Skills Learning Center program, activity or service.
- **Factor 3**: The nature and importance of programs, activities or services provided by Life Skills Learning Center to the LEP population.
- **Factor 4**: The resources available to California Vanpool Authority and overall cost to provide LEP assistance.

The third and final section discusses the implementation of the Language Assistance Plan, which includes methodologies for identifying LEP individuals, providing services, establishing policies, monitoring the LAP, and recommendations for future LAP implementations.

Updated: 8/13/2018
Purpose of the Language Assistance Plan

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance. One critical concern addressed by Title VI is the language barrier that Limited English Proficiency (LEP) persons face with respect to accessing information about and using transit service. Transit operators must ensure that this group has adequate access to the agency’s programs and activities, including public participation opportunities.

Executive Order 13166, titled “Improving Access to Services for Persons with Limited English Proficiency,” forbids funding recipients from “restricting an individual in any way in the enjoyment of any advantage or privilege enjoyed by others receiving any service, financial aid, or other benefit under the program,” or from “utilize[ing] criteria or methods of administration which have the effect of subjecting individuals to discrimination because of their race, color, or national origin, or have the effect of defeating or substantially impairing accomplishment of the objectives of the program as respects to individuals of a particular race, color, or national origin.”

FTA Circular 4702.1B was developed by the Federal Transit Administration (FTA) and details the administrative and reporting requirements for recipients of FTA financial assistance to comply with Title VI and related executive orders including on LEP.

The United States Department of Transportation (DOT) published guidance that directed its recipients to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for LEP customers. California Vanpool Authority’s language assistance plan (LAP) includes a four factor analysis and implementation plan that complies with the requirements of DOT LEP guidance.
Four Factor Analysis

**Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by California Vanpool Authority.**

California Vanpool Authority holds a unique position in regard to meeting the Title VI requirements. As occasional sub-recipient of FTA 5316 Grant funding, the agency's focus is primarily to provide vanpool services to those wishing to form a group and vanpool to work.

Those forming groups are either general vanpool groups going to traditional places of employment or farmworkers going to the fields to do field work. Most if not all of the farmworkers are Spanish speaking and come from communities where the predominate language is Spanish.

Given that close to 100% of some communities are Spanish speaking participants, Staff has hired bilingual staff and provided information in Spanish when working in Spanish communities. The fact that censes information only shows 17% of the California Vanpool Project area speak "English less than very well" does not accurately describe the larger percentage of residents who do not "speak English less than very well" in the rural San Joaquin Valley area.

**American Community Survey**

The U.S. Census Bureau 2008-2012 American Community Survey (ACS) Language Spoken at Home by the Ability to Speak English estimates that of the 4,570,982 residents living in the areas served by California Vanpool Authority, 2,555,870 speak Spanish at home and 796,071, or 17%, speak English less than "very well". All other non-English languages resulted in less than 1% of the population.

**Demographics of overall area served by the California Vanpool Authority**

<table>
<thead>
<tr>
<th></th>
<th>Estimate</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total:</td>
<td>4,570,982</td>
<td>100%</td>
</tr>
<tr>
<td>Speak only English</td>
<td>2,555,870</td>
<td>56%</td>
</tr>
<tr>
<td>Spanish</td>
<td>1,704,972</td>
<td>37%</td>
</tr>
<tr>
<td>* Speak English &quot;very well&quot;</td>
<td>908,903</td>
<td>20%</td>
</tr>
<tr>
<td>* Speak English less than &quot;very well&quot;.</td>
<td>796,071</td>
<td>17%</td>
</tr>
</tbody>
</table>

Updated: 8/13/2018
## Breakdown of Counties served by the CalVans

<table>
<thead>
<tr>
<th></th>
<th>Kings County</th>
<th></th>
<th>Imperial County</th>
<th></th>
<th>Kern County</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Estimate</td>
<td>Percentage</td>
<td>Estimate</td>
<td>Percentage</td>
<td>Estimate</td>
<td>Percentage</td>
</tr>
<tr>
<td><strong>Total:</strong></td>
<td>139,092</td>
<td>100%</td>
<td>161,089</td>
<td>100%</td>
<td>775,294</td>
<td>100%</td>
</tr>
<tr>
<td>Speak only English</td>
<td>79,630</td>
<td>57%</td>
<td>41,146</td>
<td>26%</td>
<td>448,868</td>
<td>58%</td>
</tr>
<tr>
<td>Spanish</td>
<td>52,281</td>
<td>38%</td>
<td>117,146</td>
<td>73%</td>
<td>289,911</td>
<td>37%</td>
</tr>
<tr>
<td>* Speak English &quot;very well&quot;</td>
<td>28,237</td>
<td>20%</td>
<td>66,456</td>
<td>41%</td>
<td>163,708</td>
<td>21%</td>
</tr>
<tr>
<td>* Speak English less than &quot;very well&quot;</td>
<td>24,044</td>
<td>17%</td>
<td>50,690</td>
<td>31%</td>
<td>126,203</td>
<td>16%</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th></th>
<th>Madera County</th>
<th></th>
<th>Merced County</th>
<th></th>
<th>Monterey County</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Estimate</td>
<td>Percentage</td>
<td>Estimate</td>
<td>Percentage</td>
<td>Estimate</td>
<td>Percentage</td>
</tr>
<tr>
<td><strong>Total:</strong></td>
<td>139,475</td>
<td>100%</td>
<td>236,786</td>
<td>100%</td>
<td>387,506</td>
<td>100%</td>
</tr>
<tr>
<td>Speak only English</td>
<td>78,004</td>
<td>56%</td>
<td>112,509</td>
<td>48%</td>
<td>183,807</td>
<td>47%</td>
</tr>
<tr>
<td>Spanish</td>
<td>56,515</td>
<td>41%</td>
<td>100,118</td>
<td>42%</td>
<td>177,463</td>
<td>46%</td>
</tr>
<tr>
<td>* Speak English &quot;very well&quot;</td>
<td>32,161</td>
<td>23%</td>
<td>54,338</td>
<td>23%</td>
<td>78,036</td>
<td>20%</td>
</tr>
<tr>
<td>* Speak English less than &quot;very well&quot;</td>
<td>24,354</td>
<td>17%</td>
<td>45,780</td>
<td>19%</td>
<td>99,427</td>
<td>26%</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th></th>
<th>Santa Barbara County</th>
<th></th>
<th>Santa Cruz County</th>
<th></th>
<th>Tulare County</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Estimate</td>
<td>Percentage</td>
<td>Estimate</td>
<td>Percentage</td>
<td>Estimate</td>
<td>Percentage</td>
</tr>
<tr>
<td><strong>Total:</strong></td>
<td>399,470</td>
<td>100%</td>
<td>249,686</td>
<td>100%</td>
<td>405,633</td>
<td>100%</td>
</tr>
<tr>
<td>Speak only English</td>
<td>238,937</td>
<td>60%</td>
<td>172,313</td>
<td>69%</td>
<td>205,925</td>
<td>51%</td>
</tr>
<tr>
<td>Spanish</td>
<td>132,351</td>
<td>33%</td>
<td>63,357</td>
<td>25%</td>
<td>182,817</td>
<td>45%</td>
</tr>
<tr>
<td>* Speak English &quot;very well&quot;</td>
<td>67,718</td>
<td>17%</td>
<td>33,549</td>
<td>13%</td>
<td>97,931</td>
<td>24%</td>
</tr>
<tr>
<td>* Speak English less than &quot;very well&quot;</td>
<td>64633</td>
<td>16%</td>
<td>29,808</td>
<td>12%</td>
<td>84,886</td>
<td>21%</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th></th>
<th>Ventura County</th>
<th></th>
<th>Fresno County</th>
<th></th>
<th>San Benito County</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Estimate</td>
<td>Percentage</td>
<td>Estimate</td>
<td>Percentage</td>
<td>Estimate</td>
<td>Percentage</td>
</tr>
<tr>
<td><strong>Total:</strong></td>
<td>774,168</td>
<td>100%</td>
<td>851,391</td>
<td>100%</td>
<td>51,392</td>
<td>100%</td>
</tr>
<tr>
<td>Speak only English</td>
<td>481,172</td>
<td>62%</td>
<td>482,304</td>
<td>57%</td>
<td>31,255</td>
<td>61%</td>
</tr>
<tr>
<td>Spanish</td>
<td>232,032</td>
<td>30%</td>
<td>282,309</td>
<td>33%</td>
<td>18,672</td>
<td>36%</td>
</tr>
<tr>
<td>* Speak English &quot;very well&quot;</td>
<td>123,382</td>
<td>16%</td>
<td>154,507</td>
<td>18%</td>
<td>8,880</td>
<td>17%</td>
</tr>
<tr>
<td>* Speak English less than &quot;very well&quot;</td>
<td>108,650</td>
<td>14%</td>
<td>127,802</td>
<td>15%</td>
<td>9,794</td>
<td>19%</td>
</tr>
</tbody>
</table>

*Updated: 8/13/2018*
California Vanpool Authority Expenditures

The program and annual budget for FY 15/16 is estimated at 8.7 million, and is divided into two activity types, general vanpools and agricultural vanpools. Expenditures in the agricultural vanpool program are estimated at 3.8 million, with primarily language of choice being Spanish. Few if any of the participants converse in English, as they are more comfortable in conversing in Spanish. All primary contact individuals are bilingual, as well as all after our support staff. We have not measured the percent of Spanish only speaking individuals because most if not all prefer speaking in Spanish.

Historical Analysis of LEP Persons Served by California Vanpool Authority

A final source of data to be considered to determine the number of LEP persons likely to be served by this program is an analysis of those consumers served. We do not track client’s ethnicity but do track those using the agriculture vanpool program. As stated earlier, these individuals generally converse in Spanish and could be considered our minority group.

Presently the program provides 267 general vanpools and 179 agricultural vanpools. This put the percentage of Hispanic or Spanish speaking individuals at close to 41%. With an average ridership of 11 per vanpool group, the total number of participants is 1,969.

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

As all of our primary contact staff is fluent in Spanish, we have not asked those that call if they are able to speak English. We assume some that call or come in one of our offices probably can, but would prefer to speak in Spanish.

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

The primary purpose of the California Vanpool Program is to promote and provide vanpool services to individuals within the areas we serve. This includes meeting with individuals at their home or place of work. New vanpools are just as often assigned in the field as in the office, it depends on what works best for the driver and riders.

Those in traditional jobs stay in their vanpool for extended periods, with some having been in a van since the inception of the program in 2002. Those in the agricultural program tend to stay with their vanpool, sometimes leaving when the growing season ends and returning when it starts again.

The average rider traveling 70 miles per day is paying $93 per month. Based on AAA 2015 cost of car ownership, the average rider is saving 58 cents per mile or $719 per month.

Calculations ($815-93=$719)

Updated: 8/13/2018
Factor 4: The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach.

Although the California Vanpool Authority does not have an operating budget or a specific line item for providing language access and outreach. Outreach expenses as they relate to LEP populations are an ongoing part of the organization's structure, particularly as it relates to the Hispanic population. Someone using the CalVans website can convert the pages to Spanish. Material including outreach documents and agreements are in Spanish. The following is the organization's list of employees showing those that are bilingual. As shown, only 4 are not bilingual and they are in the Hanford office. All out lying offices have full bilingual staff.

<table>
<thead>
<tr>
<th>Position</th>
<th>Name</th>
<th>Bilingual</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 Executive Director</td>
<td>Hughes, Ron</td>
<td></td>
</tr>
<tr>
<td>2 Accountant</td>
<td>Randhawa, Baldev</td>
<td></td>
</tr>
<tr>
<td>3 Office Manager</td>
<td>Rosie Nava</td>
<td></td>
</tr>
<tr>
<td>4 Account Clerk III</td>
<td>Streeper, Amanda</td>
<td></td>
</tr>
<tr>
<td>5 Account Clerk II</td>
<td>Maria Ortiz</td>
<td></td>
</tr>
<tr>
<td>6 Account Clerk II</td>
<td>Rodriguez, Luz</td>
<td></td>
</tr>
<tr>
<td>7 Account Clerk II</td>
<td>Ruch, Amanda</td>
<td></td>
</tr>
<tr>
<td>8 Account Clerk II</td>
<td>Sales, Raquel</td>
<td></td>
</tr>
<tr>
<td>9 Service Writer</td>
<td>Miguel Solorio</td>
<td></td>
</tr>
<tr>
<td>10 Transit Clerk</td>
<td>Michelle Gomez</td>
<td></td>
</tr>
<tr>
<td>11 Transit Assistant</td>
<td>Perez, Gloria</td>
<td></td>
</tr>
<tr>
<td>12 Transit Assistant</td>
<td>Marquez, Cecelia</td>
<td></td>
</tr>
<tr>
<td>13 Transit Coordinator</td>
<td>Banda, Gustavo</td>
<td></td>
</tr>
<tr>
<td>14 Transit Coordinator</td>
<td>Cardenas, Georgina</td>
<td></td>
</tr>
<tr>
<td>15 Transit Coordinator</td>
<td>Hernandez, Tomas</td>
<td></td>
</tr>
<tr>
<td>16 Transit Coordinator</td>
<td>Mora, Carmen</td>
<td></td>
</tr>
<tr>
<td>17 Transit Coordinator</td>
<td>Ortiz, Cuahutemoc</td>
<td></td>
</tr>
<tr>
<td>18 Lead Transit Aide</td>
<td>Aldaco, Hector</td>
<td></td>
</tr>
<tr>
<td>19 Lead Transit Aide</td>
<td>Gomez, Marino</td>
<td></td>
</tr>
<tr>
<td>20 Lead Transit Aide</td>
<td>Gonzalez, Oscar</td>
<td></td>
</tr>
<tr>
<td>21 Lead Transit Aide</td>
<td>Laura Rodriguez</td>
<td></td>
</tr>
<tr>
<td>22 Lead Transit Aide</td>
<td>Luis Aldaco</td>
<td></td>
</tr>
<tr>
<td>23 Transit Aide</td>
<td>Albert Solis</td>
<td></td>
</tr>
<tr>
<td>24 Transit Aide</td>
<td>Alcala, Angelica</td>
<td></td>
</tr>
<tr>
<td>25 Transit Aide</td>
<td>Palacio, Enrique</td>
<td></td>
</tr>
<tr>
<td>26 Transit Aide</td>
<td>Parraz, Rudy</td>
<td></td>
</tr>
<tr>
<td>27 Transit Aide</td>
<td>Ramirez, Socorro</td>
<td></td>
</tr>
<tr>
<td>28 Transit Aide</td>
<td>Sandoval, Martin</td>
<td></td>
</tr>
</tbody>
</table>

Total Spanish speaking: 24
Total Non-Spanish speaking: 4

Updated: 8/13/2018
SUMMARY

The results of the Four Factor Analysis can be summarized with the following points:

- CalVans recognizes and has prepared for the fact that a large portion of those seeking to use its services will be Spanish speaking.
- Given its bilingual Staff and outreach material, California Vanpool Authority has not identified a “true” LEP person that has not been served or could have been served in the last 12 years.
- No consumers were underserved or exited the program due to language barriers.
- Agency staff responds to LEP phone calls on a daily basis.
- Five family members of consumers were LEP in the last 14 years.
- Provision of transit is not considered an "essential" service but is a component of the California Vanpool Authority program.
- California Vanpool Authority does not have an LEP specific budget line.

Language Assistance Implementation Plan (agency specific)

Methodologies

Identifying LEP Individuals

As evidenced by the Four Factor Analysis, California Vanpool Authority is set up to receive and process Spanish speaking clients as needed. There are few if any "true" LEP individuals referred to the California Vanpool Authority program, as those contacting the agency do so in the language they are most comfortable with. The predominant language of those in the minority areas of the region is Spanish.

Providing Services

The agency does not currently have an on-going need for professional translation services; on-site agency staff is fluent in Spanish and provides translation services at all facilities as needed. Documents that are offered in Spanish include:

- Title VI Notice to the Public
- Title VI Complaint Form
- Title VI Complaint Procedures
- Program Information
- Agency website Title VI information

Documents not now in Spanish can be translated to Spanish in written form or orally transcribed.

Monitoring

California Vanpool Authority holds monthly staff meetings to review operations and identify any barriers that Spanish speaking individuals might come across. This is done in part to insure program growth within low income minority areas in the California Vanpool Authority region.
Any complaints regarding poor service being provided is reviewed when the complaint is received. The Title VI Plan will also be evaluated and updated every three years.

**Employee Training**

California Vanpool Authority conducts monthly training for staff that can include Customer Service and Language Assistance training.

**Safe Harbor Provision**

The Federal Transit Authority Circular 4702.1B states:

"DOT has adopted DOJ's Safe Harbor Provision, which outlines circumstances that can provide a "safe harbor" for recipients regarding translation of written materials for LEP populations. The Safe Harbor Provision stipulates that, if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with the recipient's written translation obligations. Translation of non-vital documents, if needed, can be provided orally. If there are fewer than 50 persons in a language group that reaches the five percent (5%) trigger, the recipient is not required to translate vital written materials but should provide written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost.

These safe harbor provisions apply to the translation of written documents only. They do not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable. A recipient may determine, based on the Four Factor Analysis, that even though a language group meets the threshold specified by the Safe Harbor Provision, written translation may not be an effective means to provide language assistance measures. For example, a recipient may determine that a large number of persons in that language group have low literacy skills in their native language and therefore require oral interpretation. In such cases, background documentation regarding the determination shall be provided to FTA in the Title VI Program."

Updated: 8/13/2018
Membership of Non-Elected Committees and Councils

California Vanpool Authority does not have a non-elected transit related advisory council at this time.

Title VI Equity Analysis

California Vanpool Authority does not have transit related facilities.
Board of Directors Approval of California Vanpool Authority Title VI Program

A RESOLUTION OF THE California Vanpool Authority BOARD OF DIRECTORS AUTHORIZING THE TITLE VI COMPLIANCE PLAN FOR THE AGENCY.

WHEREAS, California Vanpool Authority desires to comply with Title VI of the Civil Rights Act of 1964, including new provisions detailed in U.S. Department of Transportation's FTA Circular 4702.1B, "Title VI Requirement and Guidelines for Federal Transit Administration Recipients;"

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

NOW, THEREFORE BE IT RESOLVED, by the Board of Directors of California Vanpool Authority as follows:

1. The Executive Director is authorized to implement the components of the plan in order to meet Federal requirements.
2. The Executive Director is authorized to implement policies that may be necessary to comply with subsequent revisions or interpretations to the Civil Rights Act.

PASSED AND ADOPTED by the Board of Directors of California Vanpool Authority, State of California, on this 11th day of June, 2015.

President of the Board