

California Vanpool Authority



TITLE VI PROGRAM

Amended: September 13, 2022

Approved by the California Vanpool Authority

Board of Directors: October 13, 2022

Post Office Box 209

Hanford, CA 93232

Contact: Georgina Landecho, Executive Director

(530) 383-9348

www.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."

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California Vanpool Authority Title VI Notice to the Public

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 georgina.landecho@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 (866) 655-5444.

Título VI Aviso al Público Por California Vanpool Authority

Notificar al público de los derechos bajo el Título VI

California Vanpool Authority

▪ California Vanpool Authority opera sus programas y servicios sin importar la raza, el color y el origen nacional de acuerdo con el Título VI de la Ley Civil Ley de derechos. Cualquier persona que crea que ha sido agraviado por cualquier práctica discriminatoria ilegal bajo el Título VI puede presentar una queja con la Autoridad de Vanpool de California.

▪ Para obtener más información sobre el programa de derechos civiles de California Vanpool Authority y los procedimientos para presentar una queja, comuníquese con California Vanpool Authority o visite nuestra oficina administrativa en 1340 North Drive, Hanford CA 93230. Para obtener más información, también puede enviar un correo electrónico a georgina.landecho@co.kings.ca.us

▪ Un demandante puede presentar una queja directamente ante la Administración Federal de Tránsito mediante la presentación de una queja ante la Oficina de Derechos Civiles,

Atención: Coordinador del Programa Título VI,
Edificio Este, 5th Floor-TCR,
1200 New Jersey Ave., SE,
Washington, DC 20590

▪ Si se necesita informacion en otro idioma, contacte al (866) 655-5444.

List of Locations Where Title VI Notice Is Posted

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

Location Name	Address	City
CalVans office	1340 North Drive	Hanford
CalVans office	18035 E Telegraph Rd, Unit B	Santa Paula
CalVans office	40 Elm Circle	Greenfield
CalVans office	1547 Dogwood Road	El Centro
CalVans office	109 N Oak Glenn	Nipomo

The Title VI notice and program information is also provided on California Vanpool Authority website at <http://www.calvans.org/>

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 acknowledgment 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 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

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:		
5. Accessible Format Requirements?	<input type="checkbox"/> Large Print	<input type="checkbox"/> Audio Tape
	<input type="checkbox"/> TDD	<input type="checkbox"/> Other
Section II:		
6. Are you filing this complaint on your own behalf?	YES*	NO
*If you answered "yes" to #6, go to Section III.		
7. If you answered "no" to #6, what is the name of the person for whom you are filing this complaint? Name:		
8. What is your relationship with this individual:		
9. Please explain why you have filed for a third party:		
10. Please confirm that you have obtained permission of the aggrieved party to file on their behalf.	YES	NO
Section III:		
11. I believe the discrimination I experienced was based on (check all that apply):		
<input type="checkbox"/> Race	<input type="checkbox"/> Color	<input type="checkbox"/> 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.		

California Vanpool Authority Title VI Complaint Form, Page 2

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 by mail to the address below:

California Vanpool Authority
Title VI Coordinator, Executive Director
Post Office Box 209, Hanford, CA 93232

Procedimientos de Reclamación Título VI

Como beneficiador de fondos federales, California Vanpool Authority es requerido a cumplir con el Título 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 Título 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 1 de octubre de 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 Título 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 infórmele 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 especifica que no hubo una violación bajo el Título 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.

California Vanpool Authority Forma de Reclamación Título IV

FORMA DE RECLAMACION

Sección I: Por favor escriba legible		
1. Nombre:		
2. Dirección:		
3. Teléfono:	3.a. Teléfono secundario (Opcional):	
4. Correo Electronico:		
5. ¿Algún requisito formato accesible?	<input type="checkbox"/> Letra grande	<input type="checkbox"/> Audio Tape
	<input type="checkbox"/> TDD	<input type="checkbox"/> Otro
Sección II:		
6. ¿Esta presentando esta queja en su propio nombre?	SI*	NO
*Si contesto "si" 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 discriminacion que he experimentado se baso en (anote lo aplicable): <input type="checkbox"/> Raza <input type="checkbox"/> Color <input type="checkbox"/> Origen Nacional		
12. Fecha cual ocurrió el incidente de discriminación: (mm/dd/aaaa)		
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 paginas extras para seguir explicando.		

California Vanpool Authority Forma de Reclamación Título VI, Pagina 2

FORMA DE RECLAMACION

Sección IV:		
14. ¿Anteriormente ha usted clasificado una queja Título 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 clasifico la reclamación.		
Nombre: _____		
Titulo: _____		
Agencia: _____		
Dirección: _____		
Teléfono: _____		Correo Electronico: _____
Sección VI:		
Nombre de la Agencia de Transito la cual fue la que en contra: _____		
Nombre del Contacto: _____		
Teléfono: _____		

Pude 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 person o por correo a la direccion abajo:
California Vanpool Authority, Director Ejecutivo
PO Box 209, Hanford, Ca 93232

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

Type of Process	Date	Summary (including basis of complaint)	Status	Action(s) Taken
Investigations				
None				
Lawsuits				
None				
Complaints				
None				

Public Participation Plan

About California Vanpool Authority

The California Vanpool Authority is a public transit agency formed as a Joint Powers Agency representing various Council of Governments and/or Regional Planning Agencies formed for the purpose of providing vanpool services to residents and businesses 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.

The California Vanpool Authority vanpool participants are commuters and residents from low income or disadvantaged communities. The CalVans vanpool 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 various groups and civic organizations as invited. These groups range from City Councils to diverse support and community based organization 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 in disadvantaged communities.

Outreach Efforts

Outreach efforts are conducted by the 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 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 teleconference call with Board or Staff members at various locations. The public can attend via Zoom teleconference. Agenda items and call-in instructions are posted regularly at this link: <https://calvans.org/agenda-items>.

Staff for each of the member 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.

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.

- **Factor 1:** The number or proportion of LEP persons eligible to be served or likely to be encountered by California Vanpool Authority.
- **Factor 2:** The frequency with which LEP persons come in contact with the Life Skills Learning Center program, activity or service.
- **Factor 3:** The percentage of LEP persons who use the CalVans program.
- **Factor 4:** The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach.

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.

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:

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 (Job Access and Reverse Commute or JARC 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 bilingual Spanish speaking but according to the National Institute of Indigenous Languages (INALI), Mexico has approximately 68 languages from communities where the predominate language is Spanish but may also include an indigenous language such as Triqui or Mixtec. Given that close to 100% of some communities are Spanish speaking participants, Staff has bilingual staff and provides information in Spanish when working in Spanish communities.

According to the 2010 U.S. Census data, 17% of the California Vanpool Authority Project area spoke “English less than very well” but did not accurately describe the larger percentage of residents who did not “speak English less than very well” in the rural San Joaquin Valley area.

The 2020 U.S. Census data is more reflective of what staff has experienced reporting 43.9% of people in California above the age of 5 spoke a language other than English at home. With a population of around 37 million people and over 200 languages spoken, English is still the most used language in California with an estimated 20,763,638 speakers which translates to 56.1% of the states population. Spanish is the second most spoken language in California accounting to 10,434,308 of the population.

Label	California	
	Estimate	Percent
LANGUAGE SPOKEN AT HOME		
Population 5 years and over	37,027,601	
English only	20,763,638	56.1%
Language other than English	16,263,963	43.9%
Speak English less than "very well"	6,449,300	17.4%
Spanish	10,434,308	28.2%
Speak English less than "very well"	4,065,731	11.0%
Other Indo-European languages	1,774,886	4.8%
Speak English less than "very well"	518,261	1.4%
Asian and Pacific Islander languages	3,613,147	9.8%
Speak English less than "very well"	1,719,768	4.6%
Other languages	441,622	1.2%
Speak English less than "very well"	145,540	0.4%

<https://data.census.gov/cedsci/table?q=DP02&g=0400000US06%240500000>

Updated: 09/13/2022

American Community Survey

The U.S. Census Bureau's 2021 American Community Survey (ACS) Language Spoken at Home by the Ability to Speak English estimates that of the 11,608,945 residents living in the areas served by California Vanpool Authority, 3,446,673 speak Spanish at home and 1,991,651, speak English less than "very well". All other non-English languages resulted in 1,420,408 or 12% of the population served by CalVans.

2021 ACS

LANGUAGE SPOKEN AT HOME

Geographic Area Name by California County	Total Population 5 years and over	English	Language other than English	Language other than English "Speak English less than very well"	Spanish	Spanish Speak English less than very well"	Other Indo- European languages	Other Indo- European languages "Speak English less than very well"	Asian and Pacific Islander languages	Asian and Pacific Islander languages "Speak English less than very well"	Other languages	Other languages "Speak English less than very well"
Fresno	941,583	539,552	402,031	156,090	309,817	120,789	32,491	10,774	51,308	22,931	8,415	1,596
Imperial	167,233	43,244	123,989	59,697								
Kern	851,961	463,324	388,637	152,423	348,824	139,192	15,083	3,607	20,703	8,161	4,027	1,463
Kings	142,598	83,341	59,257	24,920	52,252	22,682	2,070	883	4,424	1,355	511	
Lake	65,142	52,754	12,388	4,410								
Madera	148,287	80,294	67,993	26,862	63,268	25,132	3,003	426	954	641	768	663
Merced	265,971	125,589	140,382	56,525	119,022	47,639	9,423	3,056	11,937	5,830		
Monterey	408,838	182,447	226,391	103,502	199,900	93,374	9,783	3,678	13,488	4,915	3,220	1,535
Napa	129,859	87,551	42,308	20,529	33,521	17,298	3,336	1,027	4,974	2,161	477	43
Riverside	2,312,837	1,338,347	974,490	341,693	808,946	277,644	47,111	11,915	97,605	45,187	20,828	6,947
San Benito	62,508	36,377	26,131	10,520								
San Joaquin	737,180	441,040	296,140	122,807	191,161	77,604	39,654	18,351	59,619	25,002	5,706	1,850
San Luis Obispo	270,783	228,174	42,609	16,299	30,327	13,237	4,826	703	4,787	1,553	2,669	806
Santa Barbara	419,750	258,586	161,164	68,043	128,638	58,048	11,055	1,673	15,951	5,700	5,520	2,622
Santa Clara	1,784,563	819,800	964,763	361,575	309,098	115,165	169,944	36,216	461,091	203,275	24,630	6,919
Santa Cruz	256,077	172,174	83,903	31,241	66,276	27,535	8,346	1,642	6,313	1,527	2,968	537
Solano	426,233	294,483	131,750	51,955	75,200	28,959	10,325	3,419	44,493	18,696	1,732	881
Sonoma	463,676	341,113	122,563	54,487	89,575	42,727	13,210	2,946	14,812	7,297	4,966	1,517
Stanislaus	515,559	279,643	235,916	91,502	185,554	69,129	24,574	8,206	13,053	8,793	12,735	5,374
Tulare	442,771	223,344	219,427	115,740	197,746	106,814	7,561	2,025	9,767	6,194	4,353	707
Ventura	795,536	488,179	307,357	120,831	237,548	96,697	27,531	6,489	32,932	13,813	9,346	3,832
	11,608,945	6,579,356	5,029,589	1,991,651	3,446,673	1,379,665	439,326	117,036	868,211	383,031	112,871	37,292

California Vanpool Authority Expenditures

The program and annual budget for FY 22/23 is estimated at 15.1 million, and is divided into two activity types, general vanpools and agricultural vanpools. Expenditures in the agricultural vanpool program are estimated at 13.6 million, with Spanish being the dominant language of our agricultural vanpool groups. Few, if any of the participants converse in English, as they are more comfortable conversing in Spanish. All primary CalVans staff are bilingual, as are our support staff. We have not measured the percent of monolingual Spanish speakers 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 participant 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.

Factor 1: The percentage of LEP persons who use the CalVans program.

Presently the program provides 101 general vanpools and 621 agricultural vanpools. This puts the percentage of Hispanic or Spanish speaking individuals at close to 86.01 %. With an average ridership of 14 per vanpool group, the total number of participants is 8,694 daily.

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 speak English, but prefer or are more comfortable speaking 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 CalVans vanpool program is to promote and provide vanpool service 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 fields and orchards as at the CalVans office, it depends on what works best for the volunteer driver and their riders.

Those in traditional jobs stay in their vanpool for extended periods, with some having been in a vanpool 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 following season.

The average rider traveling 70 miles per day is paying \$0 per month due to employer sponsored transportation. Using a CalVans Transit Voucher saves a rider an average of \$203 monthly. Based on AAA's 2021 cost of car ownership, the average rider is saving 0.73 cents per mile or \$9282 annually or \$773.50 per month in addition to the \$203 paid by their employer for a total of *\$976.50.

*Calculations (\$203+\$773.50)x12= \$11,718 or \$976.50 dollars per month!

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 organizations structure, particularly as it relates to the Hispanic population. Anyone using the CalVans website can quickly convert the web-page to Spanish by simply clicking the flag. All materials, including outreach documents and agreements, are also in Spanish.

The following is the organizations list of employees showing those that are bilingual. As shown, only 5 in the agency are not bilingual and most satellite offices have full bilingual staff. All CalVans staff carry their iPhone with Google Translate should they ever be in a position to not reach another CalVans employee to provide assistance.

Name	Bilingual/ Bicultural	Position
Administration		
<i>Georgina Landecho</i>	Y	<i>Executive Director</i>
<i>Teresa Rodriguez</i>		<i>Transit Offices Manager</i>
<i>Cecelia Marquez</i>	Y	<i>Transit Assistant III</i>
<i>Maggie Atilano</i>	Y	<i>Transit Assistant II</i>
<i>Denise Jimenez</i>	Y	<i>Transit Clerk I</i>
Accounting		
<i>Amanda Ruch</i>		<i>Account Clerk III</i>
<i>Luz Rodriguez</i>	Y	<i>Account Clerk III</i>
<i>Diana Huerta-McLearn</i>	Y	<i>Account Clerk III</i>
<i>Arturo Garcia</i>	Y	<i>Account Clerk II</i>
<i>Marcey Caballero</i>	Y	<i>Account Clerk II</i>
<i>Sonia Guerrero</i>	Y	<i>Account Clerk I</i>
<i>Annette Humphrey</i>		<i>Account Clerk I</i>
<i>Monica Sarzi</i>		<i>Account Clerk I</i>
<i>Marco Solorio</i>	Y	<i>Account Clerk I</i>
Operations (ALL REGIONS)		
Central Valley Region		
<i>Gabriela Pacheco</i>	Y	<i>Transit Coordinator</i>
<i>Miguel Solorio</i>	Y	<i>Fleet Service Writer</i>
<i>Enrique Palacio</i>	Y	<i>Transit Aide II</i>
<i>Frank Perez</i>	Y	<i>Transit Aide II</i>
<i>Luis Aldaco</i>	Y	<i>Transit Aide I</i>
<i>Miguel Angel Solorio</i>	Y	<i>Transit Aide I</i>
<i>Eduardo Solorio</i>	Y	<i>Transit Aide I</i>
<i>Carlos Farias</i>	Y	<i>Transit Aide I</i>
<i>Salvador Solorio</i>	Y	<i>Transit Aide I</i>
Monterey/San Benito/Santa Cruz		
<i>Carmen Mora</i>	Y	<i>Transit Coordinator</i>
<i>Mario Torres Chavez</i>	Y	<i>Transit Aide I</i>
Imperial/Riverside/Yuma		
<i>Hilda Rios</i>	Y	<i>Transit Assistant III</i>
<i>Roberto Meza-Bravo</i>	Y	<i>Transit Aide I</i>
<i>Louis Pelayo</i>	Y	<i>Transit Aide I</i>
Napa/Lake/Sonoma/Mendocino/Solano		
<i>Kent McCurdy</i>		<i>Transit Aide I</i>
Ventura/Santa Barbara		
<i>Tomas Hernandez</i>	Y	<i>Transit Coordinator</i>
Santa Barbara/San Luis Obispo		
<i>Erica Ramirez</i>	Y	<i>Transit Aide II</i>

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 CalVans services will be Spanish speaking.
- Given our 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 20 years.
- No participant was under-served 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 15 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 regions served 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 easily translated to Spanish in written form or orally transcribed.

Monitoring

California Vanpool Authority holds periodic 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 and disadvantaged areas in the California Vanpool Authority regions served.

Any complaints regarding poor service would be reviewed if a complaint was received. The Title VI Plan is evaluated and updated every three years.

Employee Training

California Vanpool Authority conducts periodic training for staff that may include Customer Service and Language Assistance training as requested.

Safe Harbor Provision

The Federal Transit Authority Circular published October 1, 2012 (FTA C 4702.1B, Chap. III-9) Page 29 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."

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," published October 1, 2012,

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 13th day of October, 2022.



Steve McShane (Oct 13, 2022 11:54 PDT)
President of the Board
Steve McShane