## Cambria Community Council

## **TITLE VI PROGRAM**

# Updated: August 25, 2022 Approved by Cambria Community Council Board of Directors:

Dick Clark, President, Suzanne Kennedy, Vice President, Erin Martin, Secretary, Jim Rogers, Treasurer Tony Church, Bus Administrator, Warren Gay Asst. Bus Administrator Directors:

Bonnie Villalobos, Marcelle Bakula, Cindy Bitto, Maureen Kasper, Steve Kniffen, Jeff Rodriguez, Jim Cunningham, Miguel Sandoval

> Cambria Community Council P O Box 486 Cambria, CA 93428 (805) 927-4173

#### **INTRODUCTION**

This document was prepared by the Cambria Community Council 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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## Cambria Community Council Community Bus Title VI Notice to the Public

#### Notifying the Public of Rights Under Title VI

## Cambria Community Council

- Cambria Community Council 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 the Cambria Community Council.
- For more information on Cambria Community Council civil rights program, and the procedures to file a complaint, contact Cambria Community Council at (805) 927-4173, or visit our website at www.cambriacommunitycouncil.org. You may also reach us by mail at P. O. Box 486, Cambria, CA 93428.
- 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 (805) 927-4173.

#### Notificar al público de los derechos bajo el título VI Cambria Community Council

- Cambria Community Council 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 Cambria Community Council
- Para obtener más información sobre el programa derechos civiles capaz de industrias y el procedimientos para presentar una queja, llame al (805) 927-4173. Para más información, llame Cambria Community Council at (805)927-4173 o nuesta website at www.cambriacommunitycouncil.org. Un demandante puede presentar una queja directamente con el Federal Transit Administration por archivar una queja con la Office of Civil Rights, Attention: 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 (805) 927-4173 or P.O. Box 486, Cambria, CA 93428.

#### List of Locations Where Title VI Notice Is Posted

Cambria Community Council Bus notice to the public is currently posted at the following locations:

Location Name	Address	City
Cambria Library	Main Street and Cambria Drive	Cambria

The Title VI notice and program information is also provided on both Cambria Community Council Community buses and on our website www.cambriacommunitycouncil.org

#### **Title VI Complaint Procedures**

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

Anyone who believes they have been discriminated against on the basis of race, color, or national origin by the Cambria Community Council may file a Title VI complaint by completing and filing the agency's Title VI Complaint Form. The Cambria Community Council investigates complaints received no more than 180 days after the alleged incident. The Cambria Community Council will only process complaints that are complete.

Within 10 business days of receiving the complaint, the Cambria Community Council will review it to determine if our office has jurisdiction. The claimant will receive an acknowledgement letter informing them if the complaint will be investigated by our office. The Cambria Community Council has 30 days to investigate the complaint. The plaintiff will be notified in writing of the case to any planned extension of the 30-day rule.

If more information is needed to resolve the case, the Cambria Community Council may contact the complainant. The complainant has 10 business days from the date of the letter to send the 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, the Cambria Community Council may administratively close the case.

A case can also be closed administratively if the plaintiff no longer wishes to pursue his or her case. After the investigator reviews the complaint, he or she will issue one of the two letters to the

applicant: a closing letter or a letter of finding (LOF). A closing letter summarizes the alleges and asserts that there was no violation of Title VI and that the case will be closed. One LOF summarizes allegations and interviews about the alleged incident, and explains whether any disciplinary action, additional staff member training or other action will be occur. If the plaintiff wishes to appeal the decision, they have 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 the FTA Office for Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.

## **Cambria Community Council 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?	[ ] Large Print [ ] TDD		[ ] Audio Tape	
Section II:				
6. Are you filing this compla	aint on your own b	ehalf?	YES*	NO
*If you answered "yes" to #	6, go to Section III			
7. If you answered "no" to a Name:	#6, what is the nar	ne of the person	for whom you are filing	this complaint?
8. What is your relationship	with this individu	al:		
9. Please explain why you h	ave filed for a thir	d party:		
10. Please confirm that you have obtained permission of the aggrieved party to file on their behalf.			NO	
Section III:				
11. I believe the discrimination I experienced was based on (check all that apply):				
[ ] Race		[ ] Color	1	] 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.				

## Cambria Community Council Title VI Complaint Form, Page 2

#### **COMPLAINT FORM**

P O Box 486, Cambria, CA 93428

COMITEATIVE FORM		
Section IV:		
14. Have you previously filed a Title VI complaint with	YES	NO
Cambria Community Council?	1123	110
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 the second state of the se	out a contact person a	t 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 inform complaint.	nation that you think	c is relevant to your
Signature and date are required below to complete f	orm:	
Signature	Date	
Please submit this form in person or mail this form to Cambria Community Council, Title VI Coordinator V		

#### Título VI Procedimientos de reclamación

Como receptor de dólares federales, el Consejo Comunitario de Cambria debe cumplir con el Título VI de la Ley de Derechos Civiles de 1964 y garantizar que los servicios y beneficios se proporcionen sobre una base no discriminatoria. El Consejo Comunitario de Cambria tiene un Procedimiento de Quejas del Título VI, que describe el proceso para la disposición local de las quejas del Título VI y es consistente con las pautas que se encuentran en la Circular 4702.1B de la Administración Federal de Tránsito, de fecha 1 de octubre de 2012.

Cualquier persona que crea que ha sido discriminada por motivos de raza, color u origen nacional por el Consejo Comunitario de Cambria puede presentar una queja del Título VI completando y presentando el Formulario de Queja del Título VI de la agencia. El Consejo Comunitario de Cambria investiga las quejas recibidas no más de 180 días después del presunto incidente. El Consejo Comunitario de Cambria solo procesará las quejas que estén completas.

Dentro de los 10 días hábiles posteriores a la recepción de la queja, el Consejo Comunitario de Cambria la revisará para determinar si nuestra oficina tiene jurisdicción. El reclamante recibirá una carta de acuse de recibo informándole si la queja será investigada por nuestra oficina. El Consejo Comunitario de Cambria tiene 30 días para investigar la queja. El demandante será notificado por escrito de la causa a cualquier extensión planificada de la regla de 30 días.

Si se necesita más información para resolver el caso, el Consejo Comunitario de Cambria puede ponerse en contacto con el demandante. El denunciante tiene 10 días hábiles a partir de la fecha de la carta para enviar la información solicitada al investigador asignado al caso. Si el investigador no es contactado por el demandante o no recibe la información adicional dentro de los 10 días hábiles, el Consejo Comunitario de Cambria puede cerrar administrativamente el caso.

Un caso puede cerrarse administrativamente también si el demandante ya no desea continuar con su caso. Después de que el investigador revise la queja, emitirá una de las dos cartas al

demandante: una carta de cierre o una carta de constatación (LOF). Una carta de cierre resume el alega y afirma que no hubo una violación del Título VI y que el caso se cerrará. Un LOF resume las acusaciones y las entrevistas sobre el presunto incidente, y explica si cualquier acción disciplinaria, capacitación adicional del miembro del personal u otra acción será

ocurrir. Si el demandante desea apelar la decisión, tiene 10 días hábiles después de la fecha de la carta o la LOF para hacerlo.

Una persona también puede presentar una queja directamente ante la Administración Federal de Tránsito, en la Oficina de Derechos Civiles de FTA, 1200 New Jersey Avenue SE, Washington, DC 20590.

### Formulario de Queja del Título VI del Consejo Comunitario de Cambria

## FORMULARIO DE RECLAMACIÓN

Sección I: Por favor, escriba de forma legible				
1. Nombre:				
2. Dirección:				
3. Teléfono:	3. Teléfono: 3.a. Teléfono secundario (opcional):			
4. Dirección de correo elect	rónico:			
5. ¿Requisitos de formato accesible?	[] Letra grande [] TDD		[] Cinta de audio	
Sección II:				
6. ¿Está presentando esta o	jueja en su propio	nombre?	SÍ*	No
*Si respondiste "sí" al #6, v	e a la Sección III.			
7. Si respondió "no" al # 6,	¿cuál es el nombre	de la persona po	r la que está presentand	o esta queja? Nombre:
8. ¿Cuál es su relación con	este individuo?			
9. Por favor, explique por qué ha solicitado a un tercero:				
10. Confirme que ha obtenido el permiso de la parte agraviada para presentar una solicitud en su nombre.				
Sección III:				
11. Creo que la discriminación que experimenté se basó en (verifique todo lo que corresponda):				
[] Raza [] Color [] Origen nacional				
12. Fecha de la presunta discriminación: (mm/dd/aaaa)				
13. Explique lo más claramente posible lo que sucedió y por qué cree que fue discriminado. Describa a todas las personas que estuvieron involucradas. Incluya el nombre y la información de contacto de la(s) persona(s) que lo discriminó (si se conoce), así como los nombres y la información de contacto de cualquier testigo. Si se necesita más espacio, adjunte hojas de papel adicionales.				

### Formulario de queja del Título VI del Consejo Comunitario de Cambria, página 2

#### FORMULARIO DE RECLAMACIÓN

Sección IV:		
14. ¿Ha presentado previamente una queja del Título VI ante el Consejo Comunitario de Cambria?	Sí	No
Sección V:		
15. ¿Ha presentado esta queja ante cualquier otra agencia f tribunal federal o estatal?	ederal, estatal o local,	o ante cualquier
[] SÍ* [] NO		
En caso afirmativo, marque todo lo que corresponda:		
[] Agencia Federal		
[] Tribunal Federal		
[] Tribunal Estatal		
16. Si respondió "sí" al #15, proporcione información sobr tribunal donde se presentó la queja.  Nombre:	e una persona de conta	acto en la agencia /
Título:		
Agencia:		
Dirección:		
Teléfono: Correo electrónico:		
Sección VI:		
El nombre de la queja de la Agencia de Tránsito es contra:		
Persona de contacto:		
Teléfono:		
Puede adjuntar cualquier material escrito u otra informqueja.	nación que considere	e relevante para su
La firma y la fecha se requieren a continuación para c	ompletar el formular	rio:
Signatura	Date	
Envíe este formulario en persona o envíelo por correo Consejo Comunitario de Cambria, Coordinador del Ti P O Box 486, Cambria, CA 93428	_	

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

Cambria Community Council has not been involved in any transportation-related Title VI investigations, lawsuits or complaints.

## <u>Cambria Community Council List of Investigations, Lawsuits and Complaints</u>

Type of Process	Date	Summary (including basis of complaint)	Status	Action(s) Taken
Investigations				
1. None				
2.				
Lawsuits				
1. None				
2.				
Complaints				
1. None				
2.				

#### **Public Participation Plan**

#### About Cambria Community Council and the Community Bus

The Cambria Community Council has two missions: First, to provide a local transportation system for seniors and disabled persons and, Second, to provide financial support for local non-profit organizations through a grant request and review process.

The Cambria Community Council transportation system, known locally as "The Cambria Community Bus", provides local door to door service for seniors (persons 60 and over) and disabled persons within the Cambria-San Simeon area. Multiple stops are not only allowed but encouraged. All rides are free. A dispatcher answers the dispatch phone between 9am and 11am Monday through Friday. Persons needing a ride must call in to the dispatcher at least one day prior to the scheduled ride. Each bus is equipped with a cell phone to assist in schedule adherence and process any additions or deletions to the daily schedule.

The service operates one bus locally weekdays between 8am and 4:30 pm. A second bus makes a day trip to San Luis Obispo twice a month on Tuesdays, medical appointments having priority seating. Both buses are ADA equipped.

Drivers will provide assistance if necessary for riders entering and exiting the bus as well as transporting packages and groceries into the rider's home. All drivers are volunteers from the community and again, all rides are free.

#### 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 seniors and 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 Cambria Community Council as they relate to Title VI requirements under the Public Participation Plan. Our bus service is also announced in the local telephone book. The service is recommended as needed by the local doctor's offices. Anyone eligible for the service is able to participate.

#### **Board Meetings Open to the Public**

Cambria Community Council quarterly Board meetings are open to the public and announced in a local on-line newspaper.

#### **Cambria Chamber of Commerce**

Cambria Community Council is a member of the Cambria Chamber of Commerce which helps visitors on the central coast.

#### **Local Grant Awards**

The Cambria Community Council awards grants yearly to local rural nonprofits based on need. These groups include the local Boy Scouts, Girl Scouts, Senior Nutrition, Grammar School, Middle School, and High School teachers, Sober Grad Night, Animal Rescue, Beautify Cambria, Healthcare district, Fire Department, Cambria Historical Society, and many others.

#### **Cambria Community Council Website**

The Cambria Community Council website is <a href="https://www.cambriacommunitycouncil.org">https://www.cambriacommunitycouncil.org</a>. Information about the Title VI Program appears on the site.

#### **Community Events**

The bus is also used for local events such as Piedras Blancas Lighthouse tour for seniors, Coastal Discovery Center shuttle bus, North Coast Ocean Rescue fund raiser shuttle bus, Santa Rosa Catholic Church shuttle bus The Cambria Bus appears in the local Pinedorado Labor Day Parade. These events are often outside normal bus hours and served by volunteer drivers.

#### 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 Cambria Community Council 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.

#### Purpose of the Language Assistance Plan

<u>Title VI of the Civil Rights Act of 1964</u> 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."

<u>FTA Circular 4702.1B</u> 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. Cambria Community Council language assistance plan (LAP) includes a four-factor analysis and implementation plan that complies with the requirements of DOT LEP guidance.

### Four Factor Analyses Cambria Community Council

<u>Factor 1:</u> The number or proportion of LEP persons eligible to be served or likely to be encountered by Cambria Community Council.

The Cambria Community Council holds a unique position in regard to meeting the Title VI requirements. As a sub-recipient of FTA 5310 Grant funding, the agency's focus is primarily to transport seniors and adults with disabilities where current public transit options are insufficient or do not exist. Eligible program participants or "riders" must meet limited criteria to participate in the program. As such, the Cambria Community Council does not offer transportation to the general public other than in situations involving a coordinated plan with other entities (a rare occurrence). Therefore, an analysis of public demographic data in San Luis Obispo County does not represent actual populations served by this program and is not a reflection of the program recipients.

There is one source of data that most accurately represent LEP persons likely to be served by the program, and that is the American Community Survey 2020 5-year estimates, Table B16004. This referenced table shows a Cambria population of 2340 persons 65 years of age and older. Of that population, only 13 persons have a "Not well" or "Not at all" English proficiency designation. Riders of the Cambria Community Council bus are asked for their name, address and place they will be taken to. If they are first time riders, they are also asked if they meet the criteria required to ride the bus; which is over 60 years of age or disabled (any age). No other information is asked for or given in this process, and any language needs are assessed at this time. Less than 1% of the current bus riding population is Hispanic, and no language issues have ever been reported by the dispatcher or the bus drivers.

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

As indicated above, historically, regular contact with LEP consumers has not yet occurred in this program. The bus dispatcher confirms that she **rarely** receives phone calls from LEP persons and have encountered no issues in serving non-English speaking senior or disabled recipients. The continuation of the program is contingent upon the continued ability to have resources to provide the bus service, and during our annual local fund drive, opportunities arise for the public to provide feedback and information on the services and staffing for the bus.

## <u>Factor 3:</u> The nature and importance of the program, activity, or service provided by the program to people's lives.

The primary purpose of the Cambria Community Council Community Bus program is to provide transportation to seniors and the disabled. In this rural area, this transportation allows seniors and the disabled to access services that they need in order to remain in their homes and in the community. Currently, Cambria Community Council Bus serves approximately 3000 riders per year. This number varies by week and month and fluctuates as individual's health and home situations change. Many individuals become regular riders and may remain in the program as long as their needs can continue to be met.

While, the Cambria Community Council Bus program is small, it does create opportunities in this rural environment for seniors and adults with disabilities to enhance their living conditions and quality life, and in particular, remain in their homes.

## <u>Factor 4:</u> The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach.

The Cambria Community Council Bus operating budget does not have a specific line item for providing language access and outreach. The majority of the costs for the program are tires, brakes, fuel, and insurance. Any translation of documents can be done by volunteers, and has not been quantified.

Other outreach budget allocations for the bus program normally include advertising in the local phone book, and infrequent mass mailings (large postcards) to all residents in the Cambria/San Simeon area. These mass mailings have directions in Spanish for LEP persons to call the Cambria Community Council Spanish Speaking Board member and learn more about how to obtain transportation.

The outreach budget for the Cambria Community Council, which provides services through the FTA 5310 grant, is a small fraction of the agency's budget (\$2000 annually). The total annual expenditures for the Cambria Community Council Bus are approximately \$40,000. Specific outreach to LEP populations has not been conducted as a significant number of LEP persons have not been served by this program, as indicated in Factor 1.

#### **SUMMARY**

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

- No language issues have been encountered from riders of the Cambria Community Council Bus.
- No riders were underserved or exited the program due to language barriers.
- Surveyed staff reported no issues receiving LEP phone calls. .
- Cambria Community Council does not have an LEP specific budget line.
- Cambria Community Council spends about \$2000 per year on all outreach efforts for the bus transportation program.

## **Cambria Community Council Language Assistance Implementation Plan for the Community Bus**

#### Methodologies

#### **Identifying LEP Individuals**

As evidenced by the Four Factor Analysis, LEP individuals almost never participate in the Cambria Community Council Community Bus program. The predominant minority language in the region is Spanish. The consumers that are primarily served by the Cambria Community Council Community Bus program are elderly and have disabilities that affect their ability to drive, and their ability to communicate is not a factor in their ridership.

#### **Providing Services**

While the bus program does not currently have an on-going need for professional translation services, dispatcher and driver staff have access to a translator to provide translation services as needed through the bus administrator. Documents that are offered in Spanish include:

- Title VI Notice to the Public
- Title VI Complaint Form
- Title VI Complaint Procedures

Other documents can be translated to Spanish orally or written as appropriate.

#### **Communicating Availability of Language Assistance**

When LEP individuals contact the dispatcher to set up transportation services, if translation is needed, the caller is directed to our Cambria Community Council Spanish Speaking Board Member. The Board Member will have all the information necessary to help the LEP individual schedule a ride. The Cambria Community Council website will also have directions in Spanish with how to obtain more information or schedule a ride by being directed to our Spanish speaking Board member.

Training involves teaching the dispatcher to recognize an LEP person on the telephone and communicating the short message in Spanish from a prepared script. The Spanish speaking Board member will be trained in all aspects of bus operations as they relate to dispatcher duties and then convey any information necessary to the regular dispatcher.

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#### **Monitoring**

Cambria Community Council maintains an Agency Accessibility Plan which is designed to minimize barriers that are created by architectural factors, environmental factors, attitudinal factors, financial and employment barriers and <u>communication barriers such as language</u>. This plan is reviewed and updated annually.

Cambria Community Council Annual Report is analyzed for trends and patterns that indicate a need for additional services. This report includes ethnicity and can be used as a guide to determine the need for additional translation services.

Satisfaction Surveys for the program offer an opportunity for consumers to provide input or suggest additional services. To date, translation services have not been requested. The Title VI Plan will also be evaluated and updated every three years.

#### **Volunteer Training**

Cambria Community Council conducts training for volunteer bus drivers that includes safe operation of the bus, necessary log information, and sensitivity training regarding riders.

#### 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."

As previously stated, the Cambria Community Council Bus program serves individuals who are over sixty years of age or disabled. As such, the majority of consumers have reasonable communication skills and are able to make their needs known to the volunteer drivers and the dispatcher of the bus.

#### **Membership of Non-Elected Committees and Councils**

Cambria Community Council does not have a non-elected transit related advisory council at this time.

#### **Title VI Equity Analysis**

Cambria Community Council does not have any transit related facilities. Our buses are parked in a lot owned by the State of California Cal Fire Department. We do not have an office or facility; The bus dispatcher works from home and the drivers are all volunteers. We meet quarterly at a local community meeting room or on Zoom to conduct business connected with the bus. Our bus administrator, Tony Church, also works from his home to manage the administration of the transportation program and the maintenance of the buses.

## Board of Directors Approval of Cambria Community Council Title VI Program

A RESOLUTION OF THE CAMBRIA COMMUNITY COUNCIL BOARD OF DIRECTORS AUTHORIZING THE TITLE VI COMPLIANCE PLAN FOR THE AGENCY.

WHEREAS, the Cambria Community Council 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 Cambria Community Council as follows:

- 1. The Bus Administrator is authorized to implement the components of the plan in order to meet Federal requirements.
- 2. The Bus Administrator 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 Cambria Community Council, P.O. Box 486, Cambria, California, on this <u>30<sup>TH</sup> Day of August</u>, <u>2022</u>.

Erin Martin, Secretary