

**CITY OF PASO ROBLES TRANSIT**

**TITLE VI PLAN**

**ADOPTED: AUGUST 5, 2014**

**AUGUST 5, 2014 – JULY 31, 2016**

# **TITLE VI PLAN**

## **I. Plan Statement**

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that "no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance" (42 U.S.C. Section 2000d).

The City of Paso Robles ("City") is committed to ensuring that no person is excluded from participation in, or denied the benefits of, its transit services on the basis of race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1.B.

This plan was developed to guide the City in the administration and management of Title VI-related activities.

**Title VI Coordinator**  
**Director of Administrative Services**  
**City of El Paso de Robles (Paso Robles)**  
**821 Pine St., Suite "A"**  
**Paso Robles, CA 93446**

As of June 1, 2014, the City of Paso Robles Transit is being operated by the San Luis Obispo Regional Transit Authority (RTA), a Joint Powers Agency.

## **II. Title VI Information Dissemination**

Title VI information posters shall be prominently and publicly displayed in the City of Paso Robles Transit facility (See Appendix G). The plan information, along with contact information for the City's Title VI coordinator is available on the City of Paso Robles, at [www.prcity.com](http://www.prcity.com). Additional information relating to nondiscrimination obligation can be obtained from the City of Paso Robles Title VI Coordinator.

Title VI information shall be disseminated to Paso Express operators annually via the Employee Education form (see Appendix A) in payroll envelopes. This form reminds employees of their Title VI responsibilities in their daily work and duties. During new employee Orientation, new employees shall be informed of the provisions of Title VI, and the expectations to perform their duties accordingly.

All employees shall be provided a copy of the Title VI Plan and are required to sign the Acknowledgement of Receipt (see Appendix B).

Title VI information shall also be made available in non-English languages, consistent with the City's Limited English Proficiency (LEP) plan.

### **III. Subcontracts and Vendors**

All subcontractors and vendors who receive payments from the City where funding originates from any federal assistance are subject to the provisions of Title VI of the Civil Rights Act of 1964 as amended. Written contracts shall contain non-discrimination language, either directly or through the bid specification package which becomes an associated component of the contract.

### **IV. Record Keeping:**

The Title VI Coordinator will maintain permanent records, which include, but are not limited to, signed acknowledgements of receipt from the employees indicating the receipt of the Title VI Plan, copies of Title VI complaints or lawsuits and related documentation, and records of correspondence to and from complainants, and Title VI investigations.

### **V. Title VI Complaint Procedures**

#### **Filing a Title VI Complaint**

The complainant may file a signed, written complaint up to thirty (30) days from the date of the alleged discrimination. The complaint should include the following information:

- Complainant's name, mailing address, and contact information (i.e., telephone number, email address, etc.).
- How, when, where and why the complainant believes they were discriminated against. Include the location, names and contact information of any witnesses.
- Other information that the complainant deems significant.

The Title VI Complaint Form (see Appendix C) may be used to submit the complaint information. The complaint may be filed in writing with the City of Paso Robles Transit at the following address:

**Title VI Coordinator  
Director of Administrative Services  
City of El Paso de Robles (Paso Robles)  
821 Pine St., Suite "A"  
Paso Robles, CA 93446**

Complaints may also be filed online through the City's website. The City's website address is [www.prcity.com](http://www.prcity.com).

NOTE: The City of Paso Robles encourages all complainants to use certified mail through the U.S. Postal Service and/or ensure that all written correspondence can be tracked easily by other

means. For complaints originally submitted by facsimile, an original, signed copy of the complaint must be mailed to the Title VI Coordinator as soon as possible, but no later than 30 days from the alleged date of discrimination.

**Complaint processing after submission:**

All complaints alleging discrimination based on race, color or national origin in a service or benefit will be directly addressed by City. City of Paso Robles shall also provide appropriate assistance to complainants, including those persons with disabilities, or who are limited in their ability to communicate in English. Additionally, the City of Paso Robles Transit shall make every effort to address all complaints in an expeditious and thorough manner.

A letter of acknowledging receipt of complaint will be mailed within thirty (30) days (Appendix D). Please note that in responding to any requests for additional information, a complainant's failure to provide the requested information may result in the administrative closure of the complaint.

**Notification of complainant of the outcome of the complaint process:**

The City of Paso Robles Transit will send a final written response letter (see Appendix E and F) to the complainant. In the letter notifying complainant that the complaint is not substantiated (see Appendix F), the complainant is also advised of his or her right to: 1) appeal within seven calendar days of receipt of the final written decision from the City of Paso Robles Transit, and/or 2) file a complaint externally with the U.S. Department of Transportation and/or the Federal Transit Administration. Every effort will be made to respond to Title VI complaints within 60 working days of receipt of such complaints, if not sooner.

In addition to the complaint process described above, a complainant may file a Title VI complaint with the following offices:

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

**VI. Limited English Proficiency (LEP) Plan**

City of Paso Robles (Paso Express) in cooperation with San Luis Obispo Council of Governments (SLOCOG) has developed a Limited English Proficiency Plan (LEP) to help identify reasonable steps to provide language assistance for LEP persons seeking meaningful access to transit services as required by Executive Order 13166. An LEP person is one who does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English. This plan has detailed procedures on how to identify a person who may need language assistance, the ways in which assistance may be provided, staff training on how to notify LEP persons that assistance is available, and information for future LEP plan updates.

In developing the plan, City determined the extent of obligation to provide LEP services. City has undertaken the U.S. Department of Transportation four factor LEP analysis which considers the following: 1) The number or proportion of LEP persons eligible in the City service area who maybe served or likely to encounter a City program, activity, or service; 2) the frequency with which LEP individuals come in contact with a City service; 3) the nature and importance of the program, activity or service provided by the City, including the Paso Express, to the LEP population; and 4) the resources available to City and overall costs to provide LEP assistance.

## **VII. Community Outreach**

As an agency receiving federal financial assistance, we have made the following community outreach efforts:

City of Paso Robles Transit holds public meetings, particularly in connection with service changes. At these meetings the public is welcome to attend and share in discussion with a variety of Community Outreach discussions. Additionally, City of Paso Robles Transit works with the other transit agencies in the service area and other stakeholder organizations to review and discuss the planning and has involvement in the decision making process. City of Paso Robles Transit from time to time will provide on-board survey hand-outs to customers for their feedback about a variety of issues.

City of Paso Robles Transit submits to the California Department of Transportation and Federal Transit Administration annually an application for funding. The application requests funding for both capital maintenance and operating assistance. Part of the annual application is a public notice, which includes a 30-day public comment period.

## **VIII. Active Investigation, Lawsuit or Complaint**

The City of Paso Robles Transit has had no active investigations, lawsuits or complaints alleging discrimination on the basis of race, color or national origin. No transit-related Title VI investigations, complaints or Lawsuits have been made since the previous Title VI Plan submission.

## **IX. SUBRECIPIENTS MONITORING**

The City is a subrecipient of Federal funds, and has no designated subrecipients. Therefore, this does not apply to the City.

## **X. BOARD DEMOGRAPHICS**

City of Paso Robles Transit board of directors (the City Council) consist entirely of elected members. Therefore, this does not apply to the City.

## **XI. FACILITY CONSTRUCTION**

No operational or maintenance facilities have been constructed. Therefore, this does not apply to the City.

## **XII. RESOLUTION APPROVING TITLE VI PLAN**

A copy of this resolution can be found in Appendix H of this Plan. Adoption is expected on July 15, 2014.

## **XIII. SERVICE STANDARDS & SERVICE POLICIES**

Due to the scale merging of the City of Paso Robles Transit services with RTA's, transit performance standards and service policies are no longer applicable.

## **APPENDIX A    Employee Annual Education Form**

### **Title VI Policy**

No person shall, on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.

All employees of City of Paso Robles Transit are expected to consider, respect, and observe this policy in their daily work and duties. If a citizen approaches you with a question or complaint, direct him or her to the Director of Administrative Services who is the Title VI Coordinator.

In all dealings with citizens, use courtesy titles (i.e. Mr., Mrs., Ms., or Miss) to address them without regard to race, color or national origin.

## **APPENDIX B      Acknowledgement of Receipt of Title VI Plan**

I hereby acknowledge the receipt of City of Paso Robles Title VI Plan. I have read the plan and am committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services on the basis of race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1.B.

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Your signature

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Print your name

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Date

## APPENDIX C TITLE VI COMPLAINT FORM

Title VI of the 1964 Civil Rights Act requires that “No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.” If you feel you have been discriminated against in transit services, please provide the following information in order to assist us in processing your complaint and sent it to:

Provide address here

Please print clearly:

Name: \_\_\_\_\_

Address: \_\_\_\_\_

City, State, Zip Code: \_\_\_\_\_

Telephone Number: \_\_\_\_\_(home) \_\_\_\_\_(cell) \_\_\_\_\_(work)

Person discriminated against: \_\_\_\_\_

Address of person discriminated against: \_\_\_\_\_

City, State, Zip Code: \_\_\_\_\_

Please indicate why you believe the discrimination occurred:

- \_\_\_\_\_ Race
- \_\_\_\_\_ Color
- \_\_\_\_\_ National Origin
- \_\_\_\_\_ Other

What was the date of the alleged discrimination? \_\_\_\_\_

Where did the alleged discrimination take place? \_\_\_\_\_

Please describe the circumstances as you saw it: \_\_\_\_\_

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Please list any and all witnesses' names and phone numbers:

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Have you previously filed a Title VI complaint with this agency?

Yes  No

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: \_\_\_\_\_

Federal Court \_\_\_\_\_

State Agency \_\_\_\_\_

State Court \_\_\_\_\_

Local Agency \_\_\_\_\_

Please provide information about a contact person at the agency/court where the complaint was filed.

Name: \_\_\_\_\_

Title: \_\_\_\_\_

Agency: \_\_\_\_\_

Address: \_\_\_\_\_

Telephone: \_\_\_\_\_

Please attach any documents you have which support the allegation. Then date and sign this form and send to the Title VI Coordinator at:

**Title VI Coordinator  
Director of Administrative Services  
City of El Paso de Robles (Paso Robles)  
821 Pine St., Suite "A"  
Paso Robles, CA 93446**

Director

\_\_\_\_\_  
Your signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Print your name

## **APPENDIX D     Sample Letter Acknowledging Receipt of Complaint**

(Date)

Ms. Jo Doe  
1234 Main St.  
San Luis Obispo, California 93401

Dear Ms. Doe:

This letter is to acknowledge receipt of your complaint against the City of Paso Robles Transit alleging \_\_\_\_\_.

An investigation will begin shortly. If you have additional information you wish to convey or questions concerning this matter, please feel free to contact this office by telephoning \_\_\_\_\_, or write to me at this address.

Sincerely,

**Title VI Coordinator  
Director of Administrative Services  
City of El Paso de Robles (Paso Robles)  
821 Pine St., Suite "A"  
Paso Robles, CA 93446**

**APPENDIX E      Sample Letter Notifying Complainant that the Complaint Is Substantiated**

Today's Date

Ms. Jo Doe  
1234 Main St.  
San Luis Obispo, California 93401

Dear Ms. Doe:

The matter referenced in your letter of \_\_\_\_\_ (date) against City of Paso Robles Transit alleging Title VI violation has been investigated. (An/Several) apparent violation(s) of Title VI of the Civil Rights Act of 1964, including those mentioned in your letter (was/were) identified. Efforts are underway to correct these deficiencies.

Thank you for calling this important matter to our attention. You were extremely helpful during our review of the program. *(If a hearing is requested, the following sentence may be appropriate.)* You may be hearing from this office, or from federal authorities, if your services should be needed during the administrative hearing process.

Sincerely,

**Title VI Coordinator  
Director of Administrative Services  
City of El Paso de Robles (Paso Robles)  
821 Pine St., Suite "A"  
Paso Robles, CA 93446**

**APPENDIX F      Sample Letter Notifying Complainant that the Complaint Is Not Substantiated**

Today's Date

Ms. Jo Doe  
1234 Main St.  
San Luis Obispo, California 93401

Dear Ms. Doe:

The matter referenced in your complaint of \_\_\_\_\_ (date) against City of Paso Robles Transit alleging \_\_\_\_\_ has been investigated.

The results of the investigation did not indicate that the provisions of Title VI of the Civil Rights Act of 1964, had in fact been violated. As you know, Title VI prohibits discrimination based on race, color, or national origin in any program receiving federal financial assistance.

City of Paso Robles Transit has analyzed the materials and facts pertaining to your case for evidence of the agency's failure to comply with any of the civil rights laws. There was no evidence found that any of these laws have been violated.

I therefore advise you that your complaint has not been substantiated, and that I am closing this matter in our files.

You have the right to 1) appeal within seven calendar days of receipt of this final written decision from City of Paso Robles Transit, and/or 2) file a complaint externally with the U.S. Department of Transportation and/or the Federal Transit Administration at Federal Transit Administration Office of Civil Rights Attention: Title VI Program Coordinator East Building, 5th Floor - TCR 1200 New Jersey Ave., SE Washington, DC 20590

Thank you for taking the time to contact us. If I can be of assistance to you in the future, do not hesitate to call me.

Sincerely,

**Title VI Coordinator  
Director of Administrative Services  
City of El Paso de Robles (Paso Robles)  
821 Pine St., Suite "A"  
Paso Robles, CA 93446**

## **APPENDIX G      Samples of Narrative to be included in Posters to be Displayed in Revenue Vehicles and Facilities**

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that "no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance" (42 U.S.C. Section 2000d).

City of Paso Robles Transit is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services on the basis of race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1.B. **If you feel you are being denied participation in or being denied benefits of the transit services provided by City of Paso Robles Transit , or otherwise being discriminated against because of your race, color, national origin, gender, age, or disability, you may contact our office at:**

**Title VI Coordinator  
Director of Administrative Services  
City of El Paso de Robles (Paso Robles)  
821 Pine St., Suite "A"  
Paso Robles, CA 93446**

For more information, visit our website at [www.prcity.com](http://www.prcity.com).

**APPENDIX H**

RESOLUTION NO. 14-105

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF EL PASO DE ROBLES  
APPROVING A TITLE VI PLAN FOR THE CITY

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WHEREAS, the City of El Paso de Robles ("City") is a recipient of Federal revenues and is required to meet Federal Regulatory requirements for Title VI of the Civil Rights act of 1964, established by CFR part 21.7; and

WHEREAS, the City has or will provide all annual certifications and assurances to the Federal Transit Administration (FTA) required for the Title VI program, and

WHEREAS, the City assures that no person or group of persons will, on the basis of race, color, national origin or limited English proficiency be subjected to discrimination in the level and quality of transportation services, programs, or activities provided by the City, whether Federally funded or not; and

WHEREAS, the City assures that all residents and visitor are afforded meaningful access to the City's programs, activities and services; and

WHEREAS, the City has updated the City's Title VI program plan to meet current FTA guidelines;

NOW THEREFORE BE IT RESOLVED by the City Council of the City of El Paso de Robles approves and adopts the updated Title VI Plan.

PASSED AND ADOPTED by the City Council of the City of El Paso de Robles this 5<sup>th</sup> day of August, 2014 by the following vote:

AYES: Strong, Steinbeck, Martin, Hamon, Picanco

NOES:

ABSENT:

ABSTAIN:

  
\_\_\_\_\_  
Duane Picanco, Mayor

ATTEST:

  
\_\_\_\_\_  
Caryn Jackson, Deputy City Clerk