

TO: James L. App, City Manager  
FROM: Jim Throop, Director of Administrative Services  
SUBJECT: FTA Title VI Plan Approval  
DATE: August 5, 2014

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Needs: For the City Council to consider adoption of an updated Title VI Plan for City.

Facts:

1. The Federal Transit Administration (FTA) administers the 5339 program (in partnership with California Department of Transportation (CalTrans) provides funding for transit facility rehabilitation and improvements, as well as other transit purposes.
2. The City has applied for funds through the 5339 program to help cover the costs of two previously undertaken improvement projects at the North County Transportation Center, located at 800 Pine Street. The Council approved this application at their regular meeting on July 15<sup>th</sup>, 2014.
3. As part of the application process, the City must have an updated Title VI plan with Limited English Proficiency (LEP) element. The Title VI plan, in accordance with the Civil Rights Act's Title VI, describe how the public will not be discriminated against on the basis of ethnicity, language proficiency, and other factors in the accessing of services provided by the City.
4. With input from Caltrans, an updated Title VI plan has been prepared. An approving resolution of the plan by the City Council is required.

Analysis & Conclusion:

The FTA section 5339 program provides funds for transit purposes including bus facility improvements. The City made needed improvements to the North County Transportation Center, and is seeking reimbursement of the improvement project costs through the 5339 program. An authorizing resolution for the application was approved on July 15, 2014. Approval of an updated Title VI plan is also needed as part of the application process.

Policy

Reference:

Civil Right Act Title VI, as amended.

Fiscal

Impact:

If the 5339 funds applied for by the City are awarded, the City will be reimbursed for \$52,000 in previously incurred expenses. Local transit funds will be made available for other uses.

Options:

- a. That the Council adopt Resolution No. 14-xx approving the updated Title VI plan, or
- b. Amend, modify, or reject the above option.

Attachments:

- 1) Updated Title VI and LEP plan
- 2) Resolution

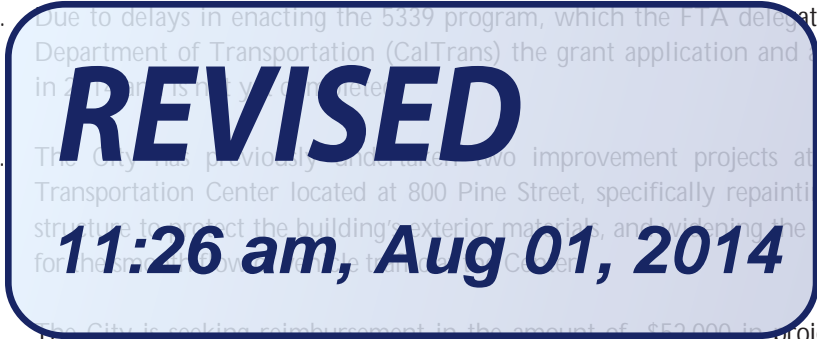
TO: James L. App, City Manager  
FROM: Jim Throop, Director of Administrative Services  
SUBJECT: FTA Title VI Plan Approval  
DATE: July 15, 2014

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Needs: For the City Council to consider adoption of a resolution approving an application for FTA 5339 funds for transit center improvements, and the submission of related documentation.

Facts:

1. The Federal Transit Administration (FTA) 5339 program provides funding for transit facility rehabilitation and improvements, as well as other transit purposes.
2. Due to delays in enacting the 5339 program, which the FTA delegated to the California Department of Transportation (CalTrans) the grant application and award process began in 2011.
3. The City has previously undertaken two improvement projects at the North County Transportation Center located at 800 Pine Street, specifically repainting the transit center structure to protect the building's exterior materials, and widening the traffic circle to allow for the side drive to the Center.
4. The City is seeking reimbursement in the amount of \$52,000 in project costs through the 5339 program. The amount being sought is below the 80% of total project costs eligible under the 5339 program rules.
5. A requirement of the application process is an authorizing resolution by the applying agency, approving the application and designating a responsible party for providing Certifications and Assurances, reimbursement documentation, and additional documentation as required by CalTrans.



Analysis & Conclusion:

The FTA section 5339 program provides funds for transit purposes including bus facility improvements. The City made needed improvements to the North County Transportation Center, and is seeking reimbursement of the improvement project costs through the 5339 program. An authorizing resolution is needed as part of the application process.

Policy

Reference:

FTA Circular 9300.1B, as amended.

Fiscal  
Impact:

If the 5339 funds applied for by the City are awarded, the City will be reimbursed for \$52,000 in previously incurred expenses. Local transit funds will be made available for other uses.

Options:

- a. That the Council adopt Resolution No. 14-xx authorizing the application for 5339 funds, and authorizing the Director of Administrative Services to provide Caltrans with the required documentation for the application and reimbursement process; or
- b. Amend, modify, or reject the above option.

Attachments:

- 1) Grant Application
- 2) Resolution



**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.

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

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

\_\_\_\_\_  
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 Court \_\_\_\_\_

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

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-\_\_\_\_\_

### A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF PASO ROBLES ADOPTING A TITLE VI POLICY AND PLAN

**WHEREAS**, The City of Paso Robles provided public transportation in Paso Robles and environs, and

**WHEREAS**, 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; and

**WHEREAS**, PASO EXPRESS commits to assure that no person shall, on the grounds of race, color, national origin, or sex, as provided by Title VI of the Civil Rights Act of 1964, be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination under any City program or activity regardless of the funding source; and

**WHEREAS**, the City receives Federal transportation funding;

**WHEREAS**, the City of Paso Robles receives Federal funding from other agencies that also have Title VI requirements.

**NOW, THEREFORE, BE IT RESOLVED**, that the City Council of the City of Paso Robles approves the proposed Title VI Policy Statement and Plan in order to meet Title VI and attendant federal requirements.

PASSED AND ADOPTED BY THE City Council of the City of Paso Robles this 15th day of July, 2014 by the following vote:

AYES:

NOES:

ABSTAIN:

ABSENT:

Duane Picanco, Mayor

ATTEST:

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Caryn Jackson, Deputy City Clerk

## LIMITED ENGLISH PROFICIENCY (LEP) PLAN

CITY OF PASO ROBLES

Adopted 8-5-2014

### Introduction

This Limited English Proficiency (LEP) Plan has been prepared to address San Luis Obispo Regional Transit Authority's responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, Federal Transit Administration Circular 4702.1B dated October 1, 2012, which state that no person shall be subjected to discrimination on the basis of race, color or national origin.

Executive Order 13166, titled Improving Access to Services for Persons with Limited English Proficiency, indicates that differing treatment based upon a person's inability to speak, read, write or understand English is a type of national origin discrimination. It directs each Federal agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discrimination does not take place. This order applies to all state and local agencies which receive federal funds.

### Plan Summary

The City has developed this LEP Plan to help identify reasonable steps for providing language assistance to persons with LEP who wish to access services provided by City. As defined in Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write or understand English.

This plan outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, staff training that may be required, and how to notify LEP persons that assistance is available.

In order to prepare this plan, City utilized the U.S. Department of Transportation (U.S. DOT) four-factor LEP analysis which considers the following factors:

1. The number or proportion of LEP persons in the service area who may be served or are likely to encounter a City transit program's activity or service.
2. The frequency with which LEP persons come into contact with City Transit programs, activities or services.
3. The nature and importance of programs, activities or services provided by City to the LEP population.
4. The resources available to City staff and overall costs of providing LEP assistance.

A summary of the results of the City four-factor analysis is in the following section.

## LIMITED ENGLISH PROFICIENCY (LEP) PLAN

### Four-Factor Analysis

1. *The number or proportion of LEP persons in the service area who may be served or are likely to encounter a City Transit program, activity or service.*

CITY staff reviewed the 2008-2012 America Community Survey Report and determined that 6,987 persons in the City of Paso Robles in San Luis Obispo County (25% of the population) speak a language other than English. Of this number, 3,281 persons (12%) have Limited English Proficiency; that is, they speak English "not well" or "not at all."

In the City of Paso Robles, of those persons with limited English proficiency, 3,040 speak Spanish, 119 speak an Asian or Pacific Island language, and 12 speak other Indo-European languages.

2. *The frequency with which LEP persons come in contact with CITY programs, activities or services.*

City assessed the frequency with which staff and drivers have, or could have, contact with LEP persons. This includes documenting phone inquiries and surveying vehicle operators for requests for interpreters and translated documents. The most frequent contact between LEP persons are with dispatchers, consisting of approximately 1/5 of total call volume. Documents related to fares, service changes and rider rules are posted on the transit vehicles in both English and Spanish. All schedules and rider information guides are also written in both Spanish and English.

3. *The nature and importance of programs, activities or services provided by CITY to the LEP population.*

The largest proportion of LEP individuals in the CITY service area speaks Spanish. The City of Paso Robles has 12.2% of speakers who speak English less than "very well". Of these, 96% are Spanish speakers, or 11.8%. Other LEP persons constitute the remaining .4% of the total City population. Services provided by City that are most likely to encounter LEP individuals are the fixed route system which serves the general public, though also on the demand-response (Dial-A-Ride, or DAR) system which serves the general public as well, though primarily seniors and persons with disabilities.

4. The resources available to CITY and overall cost to provide LEP assistance.

The City assesses its available resources that could be used for providing LEP assistance, including determining how much a professional interpreter and translation service would cost on an as-needed basis, which of its documents would be the most valuable to be translated if the need should arise, and taking an inventory of available organizations that City could partner with for outreach and translation efforts. The amount of staff and vehicle operating training that might be needed was also considered. Based on the four-factor analysis, City developed its LEP Plan as outlined in the following section.

## LIMITED ENGLISH PROFICIENCY (LEP) PLAN

### Limited English Proficiency (LEP) Plan Outline

How City staff may identify a LEP person who needs language assistance:

1. Examine records to see if requests for language assistance have been received in the past, either at meetings or over the phone, to determine whether language assistance might be needed at future events or meetings.
2. Have a staff person greet and engage participants as they arrive at City-sponsored events. By informally engaging participants in conversation it is possible to gauge each attendee's ability to speak and understand English.
3. Have Census Bureau Language Identification Flashcards, or comparable materials, available at City meetings to assist City staff in identifying language assistance needs for future events and meetings.
4. Have Census Bureau Language Identification Flashcards, or comparable materials on all transit vehicles to assist vehicle operators in identifying specific language assistance needs of passengers, if such individuals are encountered; vehicle operators will be instructed to try to obtain contact information to give to City's management for follow-up.
5. Vehicle operators and other front-line staff, like dispatchers, DAR schedulers, and service development planners, will be surveyed annually on their experience concerning any contacts with LEP persons during the previous year in order to identify needs beyond

### Language Assistance Measures

There are numerous language assistance measures available to LEP persons, both oral and written. There are also various ways in which City staff responds to LEP persons, whether in person, by telephone or in writing, as described below.

- The City conducts Outreach Programs in both English and Spanish, which will continue to provide vital information to the predominant LEP group (Spanish speakers) on City programs and services. Efforts to identify other LEP groups in needs of assistance will continue.
- The City collaborates with local human service organizations that provide services to LEP individuals by producing and distributing bilingual materials, such as mailed city announcements and postings on city websites, as part of the effort to seek opportunities to provide information on City programs and services.
- The City provides a bilingual staff member at community events, including public hearings affecting city policies and services and City Council meetings, when LEP persons are present.

Inclusion of information on language services will be included in notices and publications for these meetings, with 48 hours advance notice per the Brown Act. Provide bilingual staff in departments that frequently interface with the public.

- Survey bus drivers and other front-line staff, like dispatchers, dial-a-ride schedulers, and service development planners, annually on their experience concerning any contacts with LEP persons during the previous year.

## LIMITED ENGLISH PROFICIENCY (LEP) PLAN

- Provide Language Identification Flashcards, or comparable materials, onboard transit vehicles operated in the City, and at transit systems administrative offices.
- Post the CITY Title VI Policy and LEP Plan on the City website, [www.prcity.com](http://www.prcity.com).
- Provide group travel training to LEP persons with the assistance of bilingual staff.
- Encourage recruitment of bilingual staff through distributed recruitment materials.
- When an interpreter is needed for a language other than Spanish, in person or on the telephone, staff will attempt to access language assistance services from a professional translation service, other staff members, or qualified community volunteers. A list of volunteers would need to be developed.

### Staff Training

The following training will be provided to City staff in connection with transit activities:

1. Information on the City Title VI Procedures and LEP responsibilities
2. Description of language assistance services offered to the public
3. Use of Language Identification Flashcards
4. Documentation of language assistance requests
5. How to handle a potential Title VI/LEP complaint

### Outreach Techniques

When staff prepares a document or schedules a meeting, for which the target audience is expected to include LEP individuals, the documents, meeting notices, flyers, and agendas will be printed in an alternative language based on the known LEP population. Interpreters will be available as needed.

### Monitoring and Updating the LEP Plan

The City will update the LEP as required by the U.S. DOT. At minimum, the plan will be reviewed and updated every three years. The most current U.S. Census is available will be used. Updates will include the following:

- The number of documented LEP person contacts encountered annually.
- How the needs of LEP persons have been addressed.

- Determination of the current LEP population in the service area.
- Determination as to whether the need for translation services has changed.
- Determine whether local language assistance programs have been effective and sufficient to meet the needs of the LEP public.
- Determine whether City's financial resources are sufficient to fund needed language assistance Resources as identified.

## **LIMITED ENGLISH PROFICIENCY (LEP) PLAN**

- Determine whether City has fully complied with the goals of this LEP Plan.
- Determine whether complaints have been received concerning City failure to meet the needs of LEP individuals.

### Dissemination of the CITY LEP Plan

A link to the CITY LEP Plan and the Title VI Procedures shall be included on the CITY website at [www.prcity.com](http://www.prcity.com). This link will include access to an updated complaint form, both in English and Spanish. Any person or agency with internet access will be able to access and download the plan from the City website. Alternatively, any person or agency may request a copy of the plan via telephone, fax, mail, or in person and shall be provided a copy of the plan at no cost. LEP individuals may request copies of the plan in translation which City will provide, as feasible.

Questions or comments regarding the LEP Plan may be submitted to the City of Paso Robles, Title VI Coordinator:

City of El Paso de Robles (Paso Robles)  
 Director of Administrative Services  
 821 Pine Street, Suite A  
 Paso Robles, CA 93446  
 Phone: 805-237-3999  
 Fax: 805-237-6565  
 Email: [jthroop@prcity.com](mailto:jthroop@prcity.com) (Title VI Coordinator)



RESOLUTION NO. 14-xxx

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:

NOES:

ABSENT:

ABSTAIN:

ATTEST:

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Duane Picanco, Mayor

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Caryn Jackson, Deputy City Clerk