

JUNE 2019

TITLE VI PROGRAM REPORT



**RIVERSIDE
COUNTY
TRANSPORTATION
COMMISSION**

4080 Lemon Street, 3rd Floor
Riverside, CA 92501

If information is needed in another language, please contact (951) 787-7141 for free translation services.
Si se necesita este documento en Español, llame al 951-787-7141 para servicios de traducción gratuitos.

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Introduction and Purpose

Title VI of the Civil Rights Act of 1964 protects persons in the United States from being excluded from participation in, denied the benefits of, or subjected to discrimination on the basis of race, color, or national origin in any program or activity receiving federal financial assistance.

The Riverside County Transportation Commission (RCTC or Commission) is committed to ensuring that its services are delivered and implemented in accordance with Title VI and other non-discriminatory regulations from the state and federal levels. As a state recipient, RCTC complies with the guidelines set forth by the State of California's (State) Department of Transportation (Caltrans). Caltrans requires local agencies to adopt a non-discriminatory notice, grievance procedures, complaint form, and a Coordinator of the program. These were approved by the Commission on October 10, 2012 for implementing Title VI and Title II of the Americans with Disabilities Act (ADA). RCTC is also a recipient under the federal Department of Transportation (DOT). Under the DOT, the Federal Transit Administration (FTA) requirements for implementing Title VI include the adoption of a Title VI Program report pursuant to FTA Circular 4702.1B, *Title VI Requirements and Guidelines for Federal Transit Administration Recipients*.

The purpose of this report is to certify RCTC's compliance with FTA Circular 4702.1B every three years. As stated in Chapter II, page 1 of the Circular, RCTC will ensure that Title VI compliance is carried out in all of its programs and services, whether federally-funded or not, *"Title VI covers all of the operations of covered entities without regard to whether specific portions of the covered program or activity are federally funded... In other words, a recipient may engage in activities not described in the Circular, such as ridesharing program, roadway incident response program, or other programs not funded by FTA, and those programs must also be administered in a nondiscriminatory manner."*

The Circular has general requirements for all recipients and additional guidelines for Fixed Route Transit Providers, States, and Metropolitan Planning Organizations (MPOs). As the Regional Transportation Planning Agency (RTPA) and County Transportation Commission (CTC), the following general requirements and guidelines apply:

- 1) Title VI Notice to the Public
- 2) Title VI Complaint Procedures
- 3) Title VI Complaint Form
- 4) List of transit-related Title VI investigations, complaints, or lawsuits
- 5) Public Participation Plan
- 6) Language Assistance Plan

- 7) A table depicting the membership on non-elected committees broken down by race
- 8) Monitoring procedures for Subrecipients
- 9) Title VI equity analysis for the site and location of facilities
- 10) Documentation that the governing board has reviewed and approved the Title VI Program

The following sections of this report document how the Commission is in compliance with each requirement.

Background of RCTC

The Commission was established in 1976 by the State to oversee the funding and coordination of all public transportation services within Riverside County. The governing body consists of all five members of the County Board of Supervisors, one elected official from each of the County's 28 cities, and one non-voting member appointed by the Governor of California. As the designated RTPA and CTC, its responsibilities include setting policies, establishing priorities, coordinating activities among the County's various transit operators and local jurisdictions.

The public is most familiar with RCTC for its capital projects and motorist aid services. The various regional capital projects that RCTC is involved in throughout the County include the following:

- ✓ State Route 91 Corridor Improvement Project
- ✓ State Route 91 High Occupancy Vehicle Project
- ✓ Mid-County Parkway
- ✓ Realignment of State Route 79
- ✓ Expansion of Metrolink from Riverside to Perris
- ✓ State Route 60 Truck Climbing Lanes
- ✓ Interstate 15 Corridor Improvement Project
- ✓ State Route 91/71 Interchange Project
- ✓ Interstate 10/ State Route 60 Interchange

The Commission also provides motorist aid services designed to expedite traffic flow. These services include the Service Authority for Freeway Emergencies (SAFE), a program that provides call box service for motorists; the Freeway Service Patrol (FSP), a roving tow truck service that assist motorists with disabled vehicles on the main highways of the County during peak rush hour traffic periods; and Rideshare programs such as Inland Empire 511 (IE511), a traveler information system.

These programs and projects are funded with various local, state, and federal sources. Local funding sources consist of Measure A, the countywide sales tax; Debt proceeds, derived from issuing bonds; and Transportation Uniform Mitigation Fees (TUMF), derived from developer impact fees. State funding sources for projects are derived from the State Transportation Improvement Program (STIP). RCTC also receives apportionments of federal Surface Transportation Program (STP) and Congestion Mitigation Air Quality (CMAQ) funds from the Federal Highway Administration (FHWA); and FTA Sections 5307, 5309, 5337 formula funds. Additionally, the Commission was also awarded an FTA Small Starts grant for the Perris Valley Line. The Commission is unique in that it is not a transit provider like many other CTCs, however, does receive FTA formula funds (under the Rail Program) for transfer and expenditure for the Southern California Regional Rail Authority (SCRRA or Metrolink).

Regardless of funding source, RCTC is committed to ensuring that its projects and services are delivered and implemented in a non-discriminatory manner.

Title VI Notice to the Public

Recipients must notify beneficiaries of protections under Title VI by posting a notice in public locations that confirms that the recipient complies with Title VI and provides instructions on how to file a Title VI complaint to RCTC and directly to the FTA.

The following notice is available on RCTC's website, RCTC owned Metrolink stations, and at the front desk of RCTC's offices at 4080 Lemon Street, 3rd Floor, Riverside, CA 92501.

RCTC 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 RCTC.

For more information on RCTC's Title VI program, and the procedures to file a complaint, contact (951) 787-7141; email jstandiford@rctc.org; or visit our administrative office at 4080 Lemon Street, 3rd Floor, Riverside, CA 92501. For more information, you may also visit our website at www.rctc.org for additional information and to download a complaint form under "About Us".

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

If information is needed in another language, contact (951) 787-7141.

The notice is considered a vital document and is available in Spanish, consistent with DOT limited-English proficient (LEP) guidance and RCTC's Language Assistance Plan (LAP). The Spanish translation is also posted where English versions are located. See Appendix A for a complete English and Spanish version the Commission's Title VI Policy, Procedures, and Complaint form.

Title VI Complaint Procedures and Complaint Form

Requirements stipulate that recipients develop procedures for investigating and tracking Title VI complaints filed against them and make their procedures for filing a complaint available to members of the public. Recipients must also develop a Title VI complaint form and make this form available. RCTC's Complaint Procedures and Complaint Form are provided in Appendix A.

Similar to the Non-Discrimination policy requirements of Caltrans, the Deputy Executive Director, John Standiford, has been identified as the Civil Rights Liaison and will be the primary contact for addressing Title VI complaints. The procedures explain that any person, or group of persons, who believes that they have been subjected to discrimination on the basis of race, color, or national origin may file a complaint to RCTC, or directly to FTA. RCTC will render a decision within 15 days upon follow-up with the complainant. The Circular also requires that the recipient explicitly state that a complainant has the opportunity to submit a complaint directly to FTA and must provide the contact information for submitting a complaint.

These documents are available on RCTC's website and at the front desk of RCTC's offices at 4080 Lemon Street, 3rd Floor, Riverside, CA 92501. In addition to the public notice, the complaint procedures and form are considered vital documents and as such are available in Spanish, consistent with the DOT LEP Guidance and RCTC's LAP.

List of Transit-Related Title VI Investigations, Complaints, or Lawsuits

FTA requires that files of investigations, complaints, or lawsuits that pertain to allegations of discrimination on the basis of race, color, or national origin in transit-related activities and programs be maintained for three years and a list of cases be held for five years.

RCTC has not received any transit-related Title VI complaints, nor has it been involved in any transit-related Title VI investigations or lawsuits.

Public Participation Plan

Recipients are required to promote inclusive public participation and seek out and consider the needs and input of the general public, including interested parties and those traditionally underserved by existing transportation systems, such as minority and LEP persons.

The Public Participation Plan is the established process or plan that describes the proactive strategies, procedures, and desired outcomes of a recipient's public participation activities. RCTC developed its Public Participation Plan by considering the demographic analysis of the population(s) affected, the type of plan, program, and/or service under consideration, and the resources available to the Commission.

The Public Participation Plan is provided as Appendix B.

Language Assistance Plan

Recipients are required to take reasonable steps to ensure meaningful access to benefits, services, information, and other important portions of its programs or activities for LEP populations. FTA Circular 4702.1B details the components of the Language Assistance Plan, including the Four Factor Analysis, which provides a careful analysis of LEP persons that the recipient may encounter to determine the specific language services that are appropriate to provide.

RCTC undertook the Four Factor Analysis and developed appropriate language assistance planning based on the results. The Commission then developed a Language Assistance Plan to assist it in effectively implementing the requirements and communicating with LEP individuals.

The Language Assistance Plan is provided as Appendix C.

Membership of Non-Elected Committees and Councils

Recipients that have transit-related, non-elected planning boards, advisory councils or committees, or similar bodies, in which the membership is selected by the recipient, must provide a table depicting the racial breakdown of the membership of those committees, and a description of efforts made to encourage the participation of minorities on such committees or councils. RCTC has one transit-related committee that is applicable to this requirement, the Citizens Advisory Committee/Social Services Transportation Advisory Committee (CAC/SSTAC). Section 99238 of the State Transportation Development Act (TDA) regulations requires the Commission to have a CAC/SSTAC as part of the oversight process in administering the TDA funds. The TDA allows stipulates the membership of this body:

- 1) One representative of a potential transit user 60 years of age and older;
- 2) One representative of a potential transit user who is disabled;
- 3) Two representatives of the social service providers for seniors;
- 4) Two representatives of the social service providers for the disabled, including one representative of a social service transportation provider, if one exists;
- 5) One representative of a social service provider for persons of limited means; and
- 6) Two representatives of a Consolidated Transportation Service Agency(s) designated as such pursuant to subdivision (a) of Section 15975 of the Government Code, including one representative from an operator, if one exists.

The CAC/SSTAC serves the Commission by participating in the transit needs hearing and reviewing the Short Range Transit Plans developed by public transit operators as part of the Commission's annual budget development process. Most importantly, the CAC/SSTAC provides a dialogue between citizen appointee representatives and the public transit and specialized transit programs of Riverside County around matters of mutual concern and provides the Commission with invaluable community feedback.

Appointments are for an initial three-year term and some are extended to ensure continuity of service for the CAC. The selection process of CAC members was broadly noticed in media, on the RCTC website, and in various outreach settings, including asking Commissioners for input and conducting individualized outreach to social service providers.

In 2019, Commission staff anticipates that the existing CAC/SSTAC bylaws will be revised to expand the committee membership to include more social service agencies and transit providers to develop a more robust network that is more representative of the various populations in the county.

Citizens Advisory Committee/Social Services Transportation Advisory Council					
Race	Caucasian	Latino	African American	Asian American	Native American
CAC/SSTAC	66.5%	33.5%	0%	0%	0%

Subrecipient Compliance

If a recipient is a primary recipient, which means any FTA recipient that extends federal financial assistance to a subrecipient, then it is required to ensure that subrecipients are complying with Title VI, including the submittal of a subrecipient's Title VI documents.

In the last three years, RCTC had two subrecipients: the Southern California Regional Rail Authority (SCRRRA), better known as Metrolink, and the Riverside Transit Agency. Both agencies are also direct recipients of FTA funds and submit a Title VI report directly. Per FTA Circular 4702.1B, Chapter III, page 11: *"When a subrecipient is also a direct recipient of FTA funds, that is, applies for funds directly from FTA in addition to receiving funds from a primary recipient, the subrecipient/direct recipient reports directly to FTA and the primary recipient/designated recipient is not responsible for monitoring compliance of that subrecipient."*

Title VI Equity Analysis for Determining the Site or Location of Facilities

This requirement stipulates that recipients should complete a Title VI equity analysis during the planning stage with regard to where a project is located or sited to ensure the location is selected without regard to race, color, or national origin. The equity analysis must include:

- Outreach to persons potentially impacted by the siting of facilities.
- Comparison of the equity impacts of various siting alternatives, and the analysis must occur before the selection of the preferred site.

The purpose of completing a Title VI analysis during the project development stage is to determine if a project will have disparate impacts on the basis of race, color, or national origin. If such impacts exist then the project may move forward with the proposed location if there is substantial legitimate justification for locating the project there, and there are no alternative locations that would have a less adverse impact on members of a group protected under Title VI.

For purposes of this requirement, the Circular states that “facilities” does not include bus shelters, as they are transit amenities and are covered under the additional requirements for fixed route transit operators, nor does it include transit stations, power substations, etc., as those are evaluated during project development and the National Environmental Policy Act (NEPA) process. Facilities included in this provision include, but are not limited to, storage facilities, maintenance facilities, operations centers, etc.

There have not been any projects in the last three years requiring an equity analysis.

Approval of the Title VI Program

All recipients are required to provide documentation such as meeting minutes, resolution, or other appropriate documentation showing that the governing body reviewed and approved the Title VI Program prior to submission to FTA.

RCTC’s Title VI Program was reviewed and approved by the Budget and Implementation Committee on June 24, 2019 and forwarded to the full Commission for approval on July 10, 2019. Appendix D includes a copy of the meeting agenda and staff report.

TITLE VI NOTICE, COMPLAINT PROCEDURES, AND COMPLAINT FORM REVISED JUNE 2019

In accordance with the requirements of Title VI of the Civil Rights Act of 1964 and the Federal Transit Administration (FTA) Circular 4702.1B, the Riverside County Transportation Commission (Commission or RCTC) is required to notify beneficiaries of protection under Title VI, develop complaint procedures, and develop a complaint form.

These documents are considered vital and are translated into languages other than English, as needed and consistent with the Department of Transportation's (DOT) Limited English Proficiency (LEP) Guidance and the Commission's Language Assistance Plan (LAP).

I. POLICY AND NOTICE TO THE PUBLIC

The Commission does not discriminate or exclude individuals from its programs, services, or activities on the basis of race, color, or national origin.

The following notice shall be posted on the Commission's website, main reception area, and relevant publication materials:

RCTC 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 RCTC.

For more information on RCTC's Title VI program, and the procedures to file a complaint, contact (951) 787-7141; email jstandiford@rctc.org; or visit our administrative office at 4080 Lemon Street, 3rd Floor, Riverside, CA 92501. For more information, you may also visit our website at www.rctc.org for additional information and to download a complaint form under "About Us".

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

If information is needed in another language, contact (951) 787-7141.

Si se necesita la información en otro idioma, llame al (951) 787-7141.

II. PROCEDURES FOR FILING, INVESTIGATING, AND TRACKING COMPLAINTS

Any person, group of individuals, or entity that believes it has been subjected to discrimination on the basis of race, color, or national origin by the Commission may file a complaint directly or through a representative with the Commission or the DOT FTA.

Submission of Complaint to RCTC

To file a complaint with RCTC, the complainant may contact the main reception at (951) 787-7141 to request a copy of the complaint form and procedures, or visit the website at www.rctc.org to download the complaint form and procedures.

When possible, the complainant should complete the complaint form, or in writing provide information about the alleged discrimination containing the following:

- Name of Complainant;
- Address of Complainant;
- Phone number of Complainant;
- Date of incident;
- Location of incident; and
- Description of incident

In cases where the complainant is unable or incapable of providing a written statement, the complainant may be interviewed or the complaint form may also be provided in alternative means such as audio or Braille. The complaint should be submitted as soon as possible but no later than 180 calendar days after the alleged violation to the Deputy Executive Director by email at jstandiford@rctc.org, postal mail, or in person at the following:

Riverside County Transportation Commission
John Standiford, Deputy Executive Director
4080 Lemon Street, Third Floor
P. O. Box 12008
Riverside, CA 92502-2208

If the information provided is insufficient to conduct an investigation or render a decision, RCTC may request additional information from the complainant. Failure of the complainant to submit additional information within the designated time frame may be considered good cause to administratively close the case on the basis of lack of investigative merit.

Within 15 calendar days after receipt of the complaint, RCTC's Deputy Executive Director, or designee, will request a meeting to discuss the alleged incident with the complainant. Within 15 calendar days of the discussion, RCTC will respond in writing, and where appropriate, in a format accessible to the complainant. The response will explain the position of RCTC and offer options for resolution of the complaint.

If the complainant is not satisfied with the decision of the Deputy Executive Director, or designee, an appeal may be filed within 15 calendar days after receipt of the response, to RCTC's Executive Director.

Within 15 calendar days after receipt of the appeal, the Executive Director, or designee, will request a meeting to discuss the alleged incident with the complainant. Within 15 calendar days after the meeting, the Executive Director or designee will respond in writing, and, where appropriate, in a format accessible to the complainant, with a final decision of the complaint.

Submission of Complaint to FTA

The complainant has the right to submit a complaint directly to the FTA, however, is encouraged to initially file with RCTC. As described in FTA Circular 4702.1B, Chapter IX, to file with the FTA, the complaint must be submitted no later than 180 days after the date of alleged discrimination at the address below, unless the time for filing is extended by FTA.

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

Once a complaint has been accepted by FTA for investigation, FTA will notify RCTC that it is the subject of a Title VI complaint and ask RCTC to respond in writing to the complainant's allegations. If the complainant agrees to release the complaint to RCTC, FTA will provide RCTC with the complaint, which may have personal information redacted at the request of the complainant. If the complainant does not agree to release the complaint to RCTC, FTA may choose to close the complaint.

FTA will make a prompt investigation whenever a compliance review, report, complaint, or any other information indicates a possible failure to comply with DOT's Title VI regulations. The investigation will include, where

appropriate, a review of the pertinent practices and policies of RCTC, the circumstances under which the possible noncompliance with DOT's Title VI regulations occurred, and other factors relevant to a determination as to whether the recipient has failed to comply with DOT's Title VI regulations.

After FTA has concluded the investigation, FTA's Office of Civil Rights will transmit to the complainant and RCTC one of the following letters based on its findings:

- a. A letter of finding indicating FTA did not find a violation of DOT's Title VI regulations. This letter will include an explanation of why FTA did not find a violation. If applicable, the letter may include a list of procedural violations or concerns, which will put RCTC on notice that certain practices are questionable and that without corrective steps, a future violation finding is possible.
- b. A letter of finding indicating RCTC is in violation of DOT's Title VI regulations. The letter will include each violation referenced to the applicable regulation, a brief description of proposed remedies, notice of the time limit on coming into compliance, the consequences of failure to achieve voluntary compliance, and an offer of assistance to RCTC in devising a remedial plan for compliance, if appropriate.

FTA will administratively close Title VI complaints before a resolution is reached where (1) the complainant decides to withdraw the case; (2) the complainant is not responsive to FTA's requests for information or to sign a consent release form; (3) FTA has conducted or plans to conduct a related compliance review of the agency against which the complaint is lodged; (4) litigation has been filed raising similar allegations involved in the complaint; (5) the complaint was not filed within 180 days of the alleged discrimination; (6) the complaint does not indicate a possible violation of 49 CFR part 21; (7) the complaint is so weak, insubstantial, or lacking in detail that FTA determines it is without merit, or so replete with incoherent or unreadable statements that it, as a whole, cannot be considered to be grounded in fact; (8) the complaint has been investigated by another agency and the resolution of the complaint meets DOT regulatory standards; (9) the complaint allegations are foreclosed by previous decisions of the Federal courts, the Secretary, DOT policy determinations, or the U.S. DOT's Office of Civil Rights; (10) FTA obtains credible information that the allegations raised by the complaint have been resolved; (11) the complaint is a continuation of a pattern of previously filed complaints involving the same or similar allegations against the same recipient or other recipients that have been found factually or legally insubstantial by FTA; (12) the same complaint allegations have been filed with another Federal, state, or local agency, and FTA anticipates that the recipient will provide the complainant with a comparable resolution process under comparable legal standards; or

(13) the death of the complainant or injured party makes it impossible to investigate the allegations fully.

Tracking of Complaints

As required by FTA, all written complaints received by RCTC's Deputy Executive Director, or designee, appeals to the Executive Director, or designee, and responses from these two offices will be retained by RCTC for three years. In addition, a summary list of complaints will be tracked for five years as required.

III. COMPLAINT FORM See Attachment A.

If information is needed in another language, contact (951) 787-7141.

Si se necesita la información en otro idioma, llame al (951) 787-7141.



ATTACHMENT A: TITLE VI DISCRIMINATION COMPLAINT FORM

The Riverside County Transportation Commission (RCTC) is committed to ensuring that no person is excluded from participating in or denied the benefits of its services on the basis of race, color, or national origin as provided by Title VI of the Civil Rights Act of 1964, as amended. Complaints must be filed within 180 days from the date of the alleged discrimination. The following information is necessary to assist RCTC in processing your complaint. If you require any assistance in completing this form, please contact the Civil Rights Officer, John Standiford, by calling (951) 787-7141.

When completed, submit the original signed form or letter in person or by mail to:

**John Standiford, Deputy Executive Director
Riverside County Transportation Commission
4080 Lemon Street, Third Floor
P. O. Box 12008
Riverside, CA 92502-2208**

**FOR QUESTIONS OR ASSISTANCE IN
OTHER ACCESSIBLE FORMATS SUCH AS
LARGE PRINT, TDD, AUDIO, OR OTHER
PLEASE CALL: (951) 787-7141.
USERS WITH HEARING OR SPEECH
IMPAIRMENTS, USE THE CALIFORNIA
RELAY SERVICE, 711, AND THEN THE
NUMBER YOU NEED**

1. Contact Information:

Complainant's Name: _____
Address: _____
City, State and Zip Code: _____
Telephone: _____ (home/work) _____ (cell)

What are the most convenient days and times for RCTC to contact you about this complaint?

2. Are you filing this complaint on your own behalf? Yes: ☐ No: ☐

If you answered yes, please go to question #3.

If you answered no, please explain why you have filed for a third party:

If you answered no, please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party. Yes: ☐ No: ☐

3. Basis of discriminatory action(s):

Check (☐) all categories below that apply to the act(s) of discrimination.

a.		Race
b.		Color
c.		National Origin

4. Date and place of alleged discriminatory action(s):


Include the earliest date of discrimination and the most recent date of discrimination:

Date: _____ Location: _____

Date: _____ Location: _____

5. How were you discriminated against?

Describe the nature of the action, decision, or conditions of the alleged discrimination. Explain as clearly as possible what happened and why you believe your protected status was a factor in the discrimination. Include how other persons were treated differently from you. (Attach additional page(s) if necessary).



6. Names of individuals responsible for the discriminatory action(s):

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7. **Names of individuals (witnesses, fellow employees, supervisors, or others) whom we may contact for additional information to support or clarify your complains:**

Name

Address

Telephone No.

8. **Has this complaint been filed with any other Federal, State, or local investigative agency?**

No ☐ **Yes** ☐ **If “yes,” please provide the following information:**

Agency: _____
Contact Person: _____
Address: _____
Telephone No.: _____
Date Filed: _____

9. **Please provide any additional information that you believe would assist in the investigation:**

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

Please sign and date this form:

Signature of Complainant

Date

Si se necesita la información en otro idioma, llame al (951) 787- 7141.

AVISO, PROCEDIMIENTO DE QUEJAS Y FORMATO DE QUEJA DE TÍTULO VI ACTUALIZADO JUNIO 2019

De conformidad con los requisitos del Título VI del Decreto de Derechos Civiles de 1964 y la Circular 4702.1B de la Administración Federal de Tránsito (FTA, en inglés), la Comisión de Transporte del Condado de Riverside (Comisión o RCTC, por sus siglas en inglés) está obligada a notificar a los beneficiarios de las protecciones bajo el Título VI, desarrollar procedimientos de queja y desarrollar un formato de queja.

Estos documentos se consideran vitales y se traducen a otros idiomas diferentes al inglés, según se considere necesario y de forma consistente con la Orientación para el Dominio Limitado del Inglés (LEP, en inglés) del Departamento de Transporte (DOT, en inglés) y el Plan de Asistencia de Lenguaje de la Comisión (LAP, en inglés).

I. POLÍTICAS Y AVISO AL PÚBLICO

Es política de la Comisión de no discrimina o excluye a personas sobre la base de raza, color, u origen nacional en la admisión a sus programas, servicios o actividades, en el acceso a ellas, en el tratamiento o en cualquier aspecto de las operaciones.

El siguiente aviso debe colocarse en el sitio web de la Comisión, en la zona de recepción principal y en los materiales impresos relevantes:

La RCTC opera sus programas y servicios sin tomar en cuenta el grupo étnico ni el origen nacional de conformidad con el Título VI del Decreto de Derechos Civiles. Cualquier persona que considere que ha sido objeto de cualquier práctica discriminatoria ilegal bajo el Título VI puede presentar una queja contra la RCTC.

Para mayor información sobre el programa de Título VI de la RCTC y los procedimientos para presentar una queja, comuníquese al (951)787-7141; envíe un correo electrónico a jstandiford@rctc.org; o visite nuestras oficinas administrativas ubicadas en 4080 Lemon Street, 3rd Floor, Riverside, CA 92501. También puede visitar nuestra página web en www.rctc.org para información adicional y para descargar el formulario de queja bajo el apartado "Acerca de nosotros" (About Us, en inglés).

También puede presentar una queja directamente con la Administración Federal de Transporte, por medio de la Oficina de Derechos Civiles, a la atención del Coordinador del Programa de Título VI, East Building, 5th Floor TCR, 1200 New Jersey Avenue, SE,

Washington, DC 20590.

*Si requiere información en otro idioma, favor de comunicarse al
(951)787- 7141.*

II. PROCEDIMIENTOS PARA PRESENTAR, INVESTIGAR Y HACER SEGUIMIENTO DE LAS QUEJAS

Cualquier persona, grupo de personas o entidad que considere haber sido sometido a discriminación por motivos de grupo étnico u origen nacional por parte de la Comisión, puede presentar una queja directamente o por medio de un representante ante la comisión o la FTA del DOT.

Presentación de una queja contra la RCTC

Para presentar una queja contra la RCTC, el reclamante puede ponerse en contacto con la recepción principal al (951)787-7141 para solicitar una copia del formulario de queja y sus procedimientos, o puede visitar la página web www.rctc.org para descargar el formulario de queja y sus procedimientos.

Siempre que sea posible, el reclamante debe completar el formulario, o proporcionar por escrito la información sobre la presunta discriminación, la cual debe incluir lo siguiente:

- Nombre del reclamante;
- Domicilio del reclamante;
- Número telefónico del reclamante;
- Fecha del incidente;
- Ubicación del incidente; y
- Descripción del incidente

En casos en los que el reclamante no pueda o sea incapaz de proporcionar una declaración por escrito, se puede entrevistar al reclamante o este puede presentar su declaración por un medio alternativo como audio o Braille. La queja debe presentarse ante el Subdirector Ejecutivo lo antes posible, pero no más de 180 días naturales después de la presunta infracción, por correo electrónico a jstandiford@rctc.org, por correo postal o en persona en el siguiente domicilio:

Riverside County Transportation Commission
John Standiford, Deputy Executive Director
4080 Lemon Street, Third Floor
P. O. Box 12008
Riverside, CA92502-2208

Si la información proporcionada es insuficiente para realizar una investigación o generar una decisión, la RCTC puede solicitar al reclamante información adicional. De no presentar el reclamante la información adicional dentro del plazo designado, se puede considerar que hay suficiente causa administrativa para cerrar el caso debido a la falta de mérito investigativo.

Dentro 15 días calendario después de haber recibido la queja, el Director Ejecutivo de la RCTC, o su representante, solicitarán una reunión para abordar el presunto incidente con el reclamante. Dentro 15 días calendario después de la reunión, la RCTC responderá por escrito, y en los casos en que sea apropiado, en un formato accesible al reclamante. La respuesta explicará la postura de la RCTC y ofrecerá opciones para la resolución de la queja.

Si el reclamante no está satisfecho con la decisión del Subdirector Ejecutivo, o su representante, se puede presentar una apelación ante el Director Ejecutivo de la RCTC dentro de los 15 días calendario después de haber recibido la respuesta.

Dentro 15 días calendario siguientes después de haber recibido la apelación, el Director Ejecutivo, o su representante, solicitarán una reunión para abordar el presunto incidente con el reclamante. Dentro 15 días calendario después de la reunión, el Director Ejecutivo responderá por escrito, y en los casos en que sea apropiado, en un formato accesible al reclamante, con la decisión final respecto a la queja.

Presentación de queja ante la FTA

El reclamante tiene el derecho de presentar una queja directamente ante la FTA, sin embargo, se le exhorta a que la presente inicialmente ante la RCTC. Tal como se describe en la circular 4702.1B, capítulo IX de la FTA, para presentar una queja el reclamante debe hacerlo no más de 180 días después de la presunta discriminación, en el domicilio a continuación, a menos que la FTA amplíe el plazo para presentarla.

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

Una vez que la FTA acepte la queja para realizar una investigación, la FTA notificará a la RCTC que es sujeto de una queja de Título VI y le solicitará una respuesta por escrito respecto a la acusación del reclamante. Si el reclamante accede a que se divulgue su queja a la RCTC, la FTA se la proporcionará a la

RCTC, y dicha queja podría contener información personal oculta a petición del reclamante. Si el reclamante no está de acuerdo en divulgar la queja a la RCTC, la FTA puede elegir cerrar dicha queja.

La FTA realizará una investigación expedita siempre que un análisis del cumplimiento de las reglas, un informe, queja o cualquier otra información indiquen una posible falla en el cumplimiento de los reglamentos de Título VI del DOT. La investigación incluirá, en los casos apropiados, un análisis de las prácticas y políticas pertinentes de la RCTC; las circunstancias bajo las cuales ocurrió el posible incumplimiento con los reglamentos del Título VI del DOT y otros factores relevantes a la determinación de si el destinatario no cumplió con los reglamentos de Título VI del DOT.

Después de que la FTA concluya la investigación, la Oficina de Derechos Civiles de la FTA transmitirá al reclamante y a la RCTC una de las siguientes cartas de acuerdo con sus hallazgos:

- a. Una carta que indique que la FTA no encontró una violación de los reglamentos de Título VI del DOT. Esta carta incluirá una explicación de porqué la FTA no encontró una violación. En caso necesario, la carta podría incluir una lista de las violaciones a procedimientos o inquietudes, misma que pondrá a la RCTC sobre aviso de que ciertas prácticas son cuestionables y que de no haber pasos correctivos, es posible que en el futuro sí se detecte una violación.
- b. Una carta que indique que la RCTC ha violado los reglamentos del Título VI del DOT. La carta incluirá cada violación en referencia con los reglamentos aplicables, una breve descripción de remedios propuestos, un aviso sobre el plazo límite para darle cumplimiento, las consecuencias que tendría la falta de cumplimiento voluntario y una oferta de ayuda a la RCTC para la creación de un plan de solución para lograr el cumplimiento, en los casos apropiados.

La FTA cerrará administrativamente las quejas de Título VI antes de que se llegue a una resolución si (1) el reclamante decide retractar el caso; (2) el reclamante no responde cuando la FTA le solicite proporcionar información o firmar un formulario de consentimiento de divulgación de información; (3) la FTA ha realizado o planea realizar un análisis de cumplimiento de la agencia contra la cual se ha presentado una queja; (4) se ha iniciado un litigio con acusaciones similares a las que incluye la queja; (5) la queja no se presentó en un lapso de 180 días después de la presunta discriminación; (6) la queja no indica una posible violación del artículo 49 CFR parte 21; (7) la queja es deficiente, insustancial o carece de detalle a tal grado que la FTA determina que no tiene mérito o tiene enunciados tan incoherentes o ilegibles que no se puede considerar que está basada en hechos; (8) la queja ha sido investigada por otra agencia y la resolución de esta reúne los estándares regulatorios del DOT; (9) las acusaciones de la queja han sido adjudicadas por decisiones

previas de los tribunales federales, el Secretario, las determinaciones de las políticas del DOT o la Oficina de Derechos Civiles del DOT; (10) la FTA obtiene información creíble de que las acusaciones en la queja han sido resueltas; (11) la queja es la continuación de un patrón de quejas previamente presentadas, las cuales involucran acusaciones iguales o parecidas en contra del mismo reclamante u otros reclamantes y que la FTA ha considerado factual o legalmente insustanciales; (12) se han presentado las mismas acusaciones en la queja ante otra agencia federal, estatal o local y la FTA anticipa que el destinatario proporcionará al reclamante un proceso de resolución comparable bajo estándares legales comparables; o (13) el fallecimiento del reclamante o de la parte afectada hace que sea imposible investigar por completo las acusaciones.

Seguimiento de las quejas

Tal como lo requiere la FTA; todas las quejas por escrito que recibe el Subdirector Ejecutivo de la RCTC, o su representante, las apelaciones ante el Director Ejecutivo, o su representante, y las respuestas de estas dos oficinas se conservarán en la RCTC durante tres años. Además, se llevará una lista resumida de las quejas durante cinco años, como es requerido.

III. FORMULARIO DE QUEJA

Ver adjunto A.

Si requiere información en otro idioma, favor de comunicarse al (951)787- 7141.



**ADJUNTO A:
FORMULARIO DE QUEJA DE DISCRIMINACIÓN DE TÍTULO VI**

La Comisión de Transporte del condado de Riverside (RCTC) se compromete a asegurar que no se excluya a ninguna persona de participar o que se le nieguen los beneficios de sus servicios debido al grupo étnico u origen nacional tan como lo dicta el Decreto de Derechos Civiles de Título VI de 1964, en su versión modificada. Las quejas deben presentarse en un lapso de 180 días después de la fecha de la presunta discriminación. Es necesaria la siguiente información para ayudar a la RCTC a procesar su queja. Si requiere ayuda para llenar este formulario, por favor comuníquese con el responsable de la Oficina de Derechos Civiles, John Standiford, llamando al (951) 787-7141.

**Una vez que llene este formulario,
preséntelo con la firma original, o una
carta firmada, en persona o por correo a:**

**John Standiford, Deputy Executive Director
Riverside County Transportation Commission
4080 Lemon Street, Third Floor
P.O.Box12008
Riverside, CA 92502-2208**

**SI TIENE PREGUNTAS O REQUIERE AYUDA
PARA OBTENER OTROS FORMATOS
ACCESIBLES TALES COMO TIPOGRAFÍA
GRANDE, TDD, AUDIO U OTRO, FAVOR DE
LLAMAR AL: (951)787-7141.
LOS USUARIOS CON IMPEDIMENTO DEL
HABLA O DE AUDICIÓN, PUEDEN USAR
EL SERVICIO DE TRANSMISIÓN DE
CALIFORNIA, 711, Y DESPUÉS EL
NÚMERO QUE NECESITA.**

1. Información de contacto:

Nombre del reclamante: _____
Domicilio: _____
Ciudad, estado y código postal: _____
Teléfono: _____(hogar/trabajo) _____(celular)

¿Cuáles son los días y el horario más conveniente para que la RCTC se comunique con usted respecto a esta queja?

2. ¿Presenta usted esta queja por su propia cuenta? Sí: ☐ No: ☐

Si respondió que sí, por favor vaya a la pregunta #3.

Si respondió que no, por favor explique porqué presenta esta queja a nombre de un tercero:

Si respondió que no, por favor confirme que cuenta con el permiso de la parte afectada,

si es que presenta usted esta queja a nombre de un tercero. Sí: ☐ No: ☐

3. Fundamento de la(s) acción(es) discriminatoria(s):

Indique a continuación (☐) todas las categorías que apliquen al acto (actos) de discriminación.

a.	Raza
b.	Grupo étnico
c.	Origen nacional

4. Fecha y lugar de la(s) presunta(s) acción(es) discriminatoria(s):


Incluya la primera fecha de la discriminación y la fecha más reciente de la discriminación:

Fecha: _____ Ubicación: _____

Fecha: _____ Ubicación: _____

5. ¿Cómo se discriminó en su contra?

Describa el tipo de acción, decisión o condiciones de la presunta discriminación. Explique lo más claro posible qué ocurrió y por qué cree usted que su condición protegida fue un factor en la discriminación. Incluya cómo otras personas fueron tratadas de forma diferente a usted. (Adjunte páginas adicionales de ser necesario).



6. Nombre de las personas responsables por la(s) acción(es) discriminatoria(s):

--

7. **Nombre de las personas (testigos, empleados, supervisores u otros) a quienes podríamos contactar para obtener información adicional en apoyo o aclaración de su queja:**

Nombre

Domicilio

Número telefónico

8. **¿Se ha presentado esta queja ante otra agencia investigadora federal, estatal o local?**
No ☐ Sí ☐ Si respondió que "sí", indique la siguiente información:

Agencia: _____

Persona de contacto: _____

Domicilio: _____

Núm. telefónico: _____

Fecha en que se presentó: _____

9. **Favor de proporcionar cualquier información adicional que considere de ayuda en la investigación:**

Puede adjuntar cualquier material por escrito u otra información que considere relevante para su queja.

Favor de firmar y anotar la fecha:

Firma del reclamante

Fecha

Si necesita información en otro idioma, llame al (951) 787- 7141.

APPENDIX B

TITLE VI

PUBLIC PARTICIPATION PLAN



**RIVERSIDE
COUNTY
TRANSPORTATION
COMMISSION**

4080 Lemon Street, 3rd Floor
Riverside, CA 92501

If information is needed in another language, please contact (951) 787-7141 for free translation services.
Si se necesita este documento en Español, llame al 951-787-7141 para servicios de traducción gratuitos.

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I. Introduction

Background of RCTC

The Commission was established in 1976 by the State of California (State) to oversee the funding and coordination of all public transportation services within Riverside County. The governing body consists of all five members of the County Board of Supervisors, one elected official from each of the County's 28 cities, and one non-voting member appointed by the Governor of California. It is the designated Regional Transportation Planning Agency (RTPA) and County Transportation Commission (CTC). Its responsibilities include setting policies, establishing priorities, coordinating activities among the County's various transit operators and local jurisdictions.

RCTC's capital projects, motorist aid services and transit-related programs and projects are funded with various local, state, and federal sources. Local funding sources consist of the Measure A, the countywide sales tax; debt proceeds derived from issuing bonds; and Transportation Uniform Mitigation Fees (TUMF) derived from developer impact fees. State funding sources for projects are derived from the State Transportation Improvement Program (STIP). RCTC also receives apportionments of federal Surface Transportation Program (STP) and Congestion Mitigation Air Quality (CMAQ) funds from the Federal Highway Administration (FHWA); and FTA Small Starts and Sections 5307, 5309, 5337 formula funds. The Commission is unique in that it is not a transit provider like many other CTCs; however, it receives FTA formula funds (under the Rail Program) for transfer and expenditure for the Southern California Regional Rail Authority (SCRRA or Metrolink).

Regardless of funding source, RCTC is committed to ensuring that its projects and services are delivered and implemented in a non-discriminatory manner.

Purpose of this Plan

This Public Participation Plan (Plan) is intended to satisfy Title VI requirements as expressed in FTA Circular 4702.1B. Recipients are required to promote inclusive public participation and seek out and consider the needs and input of the general public, including interested parties and those traditionally underserved by existing transportation systems, such as minority and Limited-English Proficient (LEP) persons.

The Public Participation Plan is the established process or plan that describes the proactive strategies, procedures, and desired outcomes of a recipient's public participation activities. This Plan will provide direction for the Commission's public processes by allowing public input for the planning process and for RCTC's programs, projects, and activities to all members of Riverside County, including citizens, organizations, and public agencies. Finally, it will develop specific strategies inclusive of low-income, minority, LEP populations, and underrepresented individuals.

RCTC developed this Plan by considering the demographic analysis of the population(s) affected, the type of plan, program, and/or service under consideration, and the resources available to the Commission.

Desired Outcomes

This Plan details RCTC's public participation goals, as well as strategies that will be implemented to assist meeting these goals. From these efforts, the Commission anticipates the following outcomes:

- Increased access to early, meaningful, and continual engagement in the transportation planning process for all individuals in Riverside County.
- Implementation of proactive strategies to bring enhanced awareness and increased access for minority individuals, LEP individuals, low-income individuals and additional underrepresented and underserved individuals.
- Participation and representation from a diverse range of perspectives.

Federal and State Requirements

Title VI and Federal Authority

Title VI of the Civil Rights Act of 1964 protects persons in the United States from being excluded from participation in, denied the benefits of, or subjected to discrimination on the basis of race, color, or national origin in any program or activity receiving federal financial assistance. Under the DOT, the Federal Transit Administration (FTA) requirements for implementing Title VI include the adoption of a Title VI Program report, including a Public Participation Plan, pursuant to FTA Circular 4702.1B, *Title VI Requirements and Guidelines for Federal Transit Administration Recipients*.

Public Hearing Requirements

Public hearing requirements may vary by project or program. The Commission may conduct a public hearing for a variety of reasons, such as approval of the Program of Projects under the Federal Transportation Improvement Program (FTIP); to discuss and present the proposed location; or significant changes to right of way and major design features, social and environmental effects of a proposed project that is funded with state and federal funds. Capital projects, for instance, will comply with Caltrans' Project Development Procedures Manual, Chapter 11 Public Hearing requirements; whereas, FTIP projects would follow the public participation requirements stipulated under the existing transportation legislation, Fixing America's Surface Transportation Act.

Public Participation Background

RCTC's traditionally seeks public involvement for both capital projects and transit-related projects.

The public is most familiar with RCTC for its capital projects. The various regional capital projects that RCTC is involved in throughout the County include the following:

- ✓ 91 Express Lanes
- ✓ Interstate 15 Express Lanes
- ✓ 15/91 Express Lanes Connector
- ✓ Interstate 15 Express Lanes Southern Extension
- ✓ 15/91 Express Lanes Connector
- ✓ State Route 91 Corridor Operations Project
- ✓ State Route 71/91 Interchange Project
- ✓ State Route 60 Truck Lanes Project
- ✓ Mid-County Parkway/Interstate 215 Placentia Avenue Interchange
- ✓ Interstate 15/Railroad Canyon Interchange Project
- ✓ Interstate 15 Express Lanes Southern Extension
- ✓ State Route 79 Realignment
- ✓ Coachella Valley-San Geronio Pass Rail Corridor Service Project
- ✓ Santa Ana River Trail Extension Projects

A specialized outreach plan is designed for each project and may include community meetings, open houses, and formal public hearings.

Transit-related projects that involve public participation may include:

- The Coordinated Plan Process
- The Citizen Advisory Committee, RCTC Social Services Transportation Advisory Committee
- The Annual Transit Needs Hearing
- The FTIP Program of Projects
- 211
- Park and Ride Lots
- Rideshare

Riverside County Demographics

Riverside County is the fourth largest county in California by area and population and is diverse in geography and demographics. According to the U.S. Census Bureau's 2017 American Community Survey, Riverside County covers 7,208 square miles and has a population of 2,355,002.

Many of the populations important to this Plan – minority, underrepresented, and low-income individuals – are described in the American Community Survey's estimates. The U.S. Census allows ACS Dataset Tables to be compared with the Decennial Census information regarding sex, age race, Hispanic origin, and homeowner status. By referring to the 2010 Decennial Census and 2017 American Community Survey Estimates, the Commission has generated the following information to showcase county growth.

- Riverside County's population experienced a 7 percent increase between 2010 and 2017.
- The adult population ages 18-64 increased by more than 5 percent, adding 113,355 individuals. Adults in these age groups represent 60 percent of the county's total population, numbering nearly 1.42 million people.
- The low-income adult population increased by 18.8 percent since the 2010 ACS Estimates, adding almost 44,200 individuals and representing 9.9 percent of the current entire population.
- Adults with disabilities total 130,300, which represents 9 percent of the adult population and six percent of the County's total population.
- The adult population age 65 or older has increased by nearly 25 percent, adding 82,000 people. This group amounts to a total of almost 340,500 persons, representing 14.1 percent of the total county population.
- Younger seniors, ages 65 to 74, is the largest senior group, representing 48 percent of all seniors.
- Older seniors, ages 85 and older, is the fastest growing group, having increased 76.8 percent from 2010 to 2017.
- The 2017 ACS estimates indicate that three-quarters of all seniors report some form of disability; as a group, the entire senior population age 65 years and older represent almost 11 percent of Riverside County's total population. Most frequently, this group's reported disabilities include difficulties with walking and living independently.

Minority Individuals

RCTC conducted demographic analysis of minority populations in the aggregate to understand where these communities are located throughout the County. FTA Title VI guidance defines a minority person as an individual of any of the following groups: American Indian and Alaskan Native, Asian, Black or African American, Hispanic or Latino, Native Hawaiian or Other Pacific Islanders.

Demographic maps are provided in Attachment A, based upon minority population count tabulations developed for each Riverside County census tract. These were derived by subtracting the Caucasian population from each tract to arrive at the non-white, minority population counts. A summary of findings is provided below. This analysis was done at the Census Tract and Block Group levels using 2013 American Community Survey 5-year estimates, which is still relevant and reflects the current demographics.

- **Figure 1:** In Western Riverside County, there are pockets of minority populations throughout the region. The largest concentrations of minority populations, between 59.2 to 84.3% of the population at the Census block group level, are found along the western border of the County near Norco and Rubidoux; near Moreno Valley; east of Banning; and in the south portion of the region, near Murrieta.
- **Figure 2:** In East Riverside County, most of the region has a minority population of 34.3% to 45.6% of the total population at the block group level. A more concentrated minority population is located on the North Shore of the Salton Sea.
- **Figure 3:** Coachella Valley is also home to many minority persons, with the largest concentrations of minority persons located north of Cabazon, north of Cathedral City and Thousand Palms and south of Thermal. In these pockets, minority persons make up 59.2 to 84.3% of the block group population of these areas.

LEP Individuals

As documented in RCTC's Language Assistance Plan (LAP), Riverside County is home to many LEP populations, several of which meet the Department of Justice's Safe Harbor provision. The Safe Harbor provision stipulates that written translation of vital documents for each eligible LEP language is to be provided if the group constitute 5% or 1,000 people, whichever is less, of the total population eligible to be served or likely to be affected or encountered. Such action will be considered strong evidence of compliance with the recipient's written translation obligation. RCTC's LAP details how RCTC will provide language assistance to these populations. This information is included here to detail the diverse populations that comprise Riverside County.

Table 1 below provides information from the 2017 American Community Survey 1-year Estimates, the most reliable and current Census source for accessing LEP information. There is a total of 38 LEP groups in Riverside County, numbering 324,336 individuals who speak English less than "very well" or 15.7 percent of Riverside County's total population. The largest LEP group is Spanish speakers, who number 291,220 and comprise 12.86 percent of the County's total population. LEP groups of more than 1,000 are highlighted in blue in Table 1 and include individuals who speak Arabic, Chinese, Gujarati, Korean, Khmer, other Indo-European, Ilocano-Samoan-Hawaiian or other Austronesian, Persian, Punjabi, Spanish,

Tagalog, Thai-Lao or other Tai Kalai, and Vietnamese. Besides Spanish, none of these LEP populations comprise 5% of the County's total population.

A thorough analysis of LEP populations in the County was conducted to develop RCTC's Language Assistance Plan, consistent with FTA guidance. This analysis found that Spanish-speaking LEPs are the LEP population most frequently contacting RCTC and accessing RCTC's programs and services.

Table 1, Riverside County LEP Populations

Table B16001: LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER 2017 American Community Survey 1-Year Estimates	Estimate	% to Total # of Population	Margin of Error
Total Population (ACS 2017 1 Year Estimates):	2,264,417	100.00%	+/-394
Speak only English	1,343,253	59.32%	+/-18,260
Spanish: Speak English less than "very well"	291,220	12.86%	+/-7,431
French (incl. Cajun): Speak English less than "very well"	459	0.02%	+/-292
Haitian: Speak English less than "very well"	79	0.00%	+/-132
Italian: Speak English less than "very well"	275	0.01%	+/-236
Portuguese: Speak English less than "very well"	617	0.03%	+/-432
German: Speak English less than "very well"	750	0.03%	+/-333
Yiddish, Pennsylvania Dutch or other West Germanic languages: Speak English less than "very well"	37	0.00%	+/-46
Greek: Speak English less than "very well"	80	0.00%	+/-132
Russian: Speak English less than "very well"	178	0.01%	+/-204
Polish: Speak English less than "very well"	0	0.00%	+/-210
Serbo-Croatian: Speak English less than "very well"	123	0.01%	+/-145
Ukrainian or other Slavic languages: Speak English less than "very well"	131	0.01%	+/-170
Armenian: Speak English less than "very well"	421	0.02%	+/-357
Persian (incl. Farsi, Dari): Speak English less than "very well"	1,394	0.06%	+/-1,156
Gujarati: Speak English less than "very well"	404	0.02%	+/-415
Hindi: Speak English less than "very well"	0	0.00%	+/-210
Urdu: Speak English less than "very well"	621	0.03%	+/-583
Punjabi: Speak English less than "very well"	1,413	0.06%	+/-1,132
Bengali: Speak English less than "very well"	146	0.01%	+/-231
Nepali, Marathi, or other Indic languages: Speak English less than "very well"	314	0.01%	+/-251
Other Indo-European languages: Speak English less than "very well"	1,371	0.06%	+/-896
Telugu: Speak English less than "very well"	130	0.01%	+/-214
Tamil: Speak English less than "very well"	257	0.01%	+/-279

Table B16001: LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER 2017 American Community Survey 1-Year Estimates	Estimate	% to Total # of Population	Margin of Error
Malayalam, Kannada, or other Dravidian languages: Speak English less than "very well"	281	0.01%	+/-276
Chinese (incl. Mandarin, Cantonese): Speak English less than "very well"	11,602	0.51%	+/-2,726
Japanese: Speak English less than "very well"	568	0.03%	+/-283
Korean: Speak English less than "very well"	4,037	0.18%	+/-1,594
Hmong: Speak English less than "very well"	981	0.04%	+/-821
Vietnamese: Speak English less than "very well"	8,263	0.36%	+/-1,854
Khmer: Speak English less than "very well"	1,623	0.07%	+/-1,190
Thai, Lao, or other Tai-Kadai languages: Speak English less than "very well"	1,883	0.08%	+/-932
Other languages of Asia: Speak English less than "very well"	50	0.00%	+/-81
Tagalog (incl. Filipino): Speak English less than "very well"	12,873	0.57%	+/-2,381
Ilocano, Samoan, Hawaiian, or other Austronesian languages: Speak English less than "very well"	1,348	0.06%	+/-854
Arabic: Speak English less than "very well"	4,076	0.18%	+/-1,753
Hebrew: Speak English less than "very well"	553	0.02%	+/-893
Amharic, Somali, or other Afro-Asiatic languages: Speak English less than "very well"	181	0.01%	+/-223
Yoruba, Twi, Igbo, or other languages of Western Africa: Speak English less than "very well"	65	0.00%	+/-80
Swahili or other languages of Central, Eastern, and Southern Africa: Speak English less than "very well"	0	0.00%	+/-210
Navajo: Speak English less than "very well"	0	0.00%	+/-210
Other Native languages of North America: Speak English less than "very well"	0	0.00%	+/-210
Other and unspecified languages: Speak English less than "very well"	373	0.02%	+/-417

RCTC's Stakeholders

Stakeholders are individuals, groups, organizations or agencies that may be directly or indirectly affected by a plan, recommendations of that plan, or a project. RCTC seeks to engage all stakeholders through its public participation efforts, particularly those who may be adversely affected or who may be denied benefit of a plan's recommendation(s).

Stakeholders include:

- General public, minority individuals, low-income individuals, LEP persons, persons with disabilities, and older adults;
- University and college students, including those from: California Baptist University, College of the Desert, La Sierra University, Moreno Valley College, Mt. San Jacinto College, Norco College, Palo Verde College, Riverside Community College, and University of California-Riverside;
- High school students throughout Riverside County;
- Non-profit organizations including Blindness Support Services, Care Connexus, Care-a-Van, CASA, Friends of Moreno Valley, Inland AIDS Project, Operation SafeHouse, among others;
- Public agencies including city governments and health and human services throughout Riverside County;
- Public transit operators: Corona Cruiser, City of Riverside Special Services, Palo Verde Valley Transit Agency, Riverside Transit Agency, SunLine Transit Agency, Banning Pass Transit, Beaumont Pass Transit; and
- Private organizations and businesses.

III. Public Participation Strategies and Tools

Public Participation Goals and Strategies

This section details RCTC public participation goals and strategies for achieving each goal.

Goal 1: Provide all interested parties and agencies reasonable opportunities for involvement in the transportation planning process.

Strategies

- Provide adequate public notice of public participation opportunities and activities and time for public review of regionally significant plans and documents.
- Use all channels of outreach for promoting public participation opportunities including RCTC's website and blog, the Citizen Advisory Council/Social Services Transportation Advisory Council (CAC/SSTAC), Southern California Associated Governments (SCAG), transit providers, news media, and social media.
- Evaluate plans, programs, and projects to determine the most appropriate and effective tools and strategies for public and agency involvement and outreach.
- Provide opportunities to comment on draft planning documents to affected agencies and parties.
- Make transportation planning documents available for viewing on the RCTC website and at key locations throughout the county, as appropriate.
- During the transportation planning process, conduct public meetings, open houses, and public hearings, as appropriate.
- Provide language interpreters (Spanish language; other languages upon request) at public meetings, open houses and public hearings.

Goal 2: Ensure accessibility to the transportation planning process and information for all members of the community; ensure that a wide range of perspectives will be heard so that planning outcomes reflect the needs of the region’s diverse communities.

Strategies

- Develop information materials that are easily understood and translated for appropriate audiences and make them accessible at meetings and on RCTC’s website.
- Make notices and announcements attractive and eye-catching.
- Plan workshops and/or public hearings at convenient venues and times across the region; ensure venues are accessible to the public.
- When appropriate, provide information about regionally significant plans and projects to the local media for distribution and promotion.
- Maintain the RCTC website with current transportation planning activities, including reports, plans, agendas and minutes for RCTC Commission meetings.
- When appropriate, present information about specific plans and projects at public forums, such as City Council and Board of Supervisors meetings for increased public and governmental awareness.
- When identifying locations for community outreach activities, prioritize locations that are accessible by public transit.
- Make every effort to accommodate requests for accessibility opportunities, including physical accessibility to public meetings as well as accessibility to information in LEP languages and alternative formats.
- Encourage early involvement in the transportation planning process by providing timely notification and access to information.
- Use citizen and/or agency advisory groups as a means of providing input to the transportation planning process.
- Identify key individuals, organizations, and community organizations that may be interested in or affected by a plan or program; include this list in any mail or email distribution.
- Collaborate with Riverside County transit providers to facilitate and promote public participation opportunities.
- Maintain the *Riverside County Transportation Network*, a list of key stakeholders updated on an annual basis. The 184 agencies and organizations on the Network include non-profits, human and social services, private transportation companies, public agencies, specialized transit providers.

Goal 3: Engage and increase opportunities for participation for those traditionally underrepresented and or underserved, including low-income, minority, persons with disabilities, and Limited English Proficiency populations.

Strategies

- Make commenting on plans convenient and accessible to the public and stakeholders; enable comments to be made at public meetings and workshops, via email or online commenting forms or by telephone.
- Offer vital information, such as notices and announcements, in alternative languages as appropriate and feasible. When considering translation and interpretation needs, the RCTC Language Assistance Plan will be consulted for strategies and procedures. Translated information shall be made available on the RCTC or project-specific website, at public meetings and workshops and at key locations across the county as appropriate and feasible.
- Translated notices, announcements, and other vital information should be posted on Riverside County transit operators' buses and at transfer centers, as is possible.
- When appropriate, use alternative media outlets that may target minority, LEP, or underserved segments of the community.
- Continue expanding the contact list with agencies, organizations and stakeholders that work with LEP communities.

Project Specific Public Participation

The project team, including Project Manager and public relations staff, is responsible for developing an appropriate public participation plan or public outreach plan that describes the strategies that will be used to communicate key information to agencies, organizations, elected officials, residents, business operators, commuters, emergency responders and other project stakeholders. Outreach activities will be integrated with the technical work program to provide information and incorporate ideas and feedback. The input that is received will facilitate fully informed decisions by RCTC Commissioners at key decision points. These plans will be specifically tailored to individual projects to reflect project area demographics, populations and need. Plans will be developed to comply with Title VI requirements.

Title VI requirements, including strategies for engaging LEP individuals, will be documented in all bid-related materials.

Updating the Public Participation Plan

RCTC's public participation goals and strategies will be reviewed as necessary and results will be considered in preparation of the three-year Title VI Program adoption. Based on the effectiveness of strategies and the potential changes to Riverside County's demographics and outreach resources, strategies may be modified and new strategies may be added to enhance the public participation process.

The following indicators may be used in reviewing and determining the effectiveness of these goals and strategies.

- Number of newspaper ads, public notices
- Number of press releases, public service announcements, and news articles

- Number of public meetings and workshops
- Number and demographics of participants at public meetings, open houses, and public hearings
- Number of visits to the RCTC website and project-specific websites
- Number of followers of social media pages, and volume of reach and impressions
- Number of comments received during the public comment period for projects and programs
- Number of requests for translated materials
- Number and content of materials translation
- Revisions to plans or projects based on public and agency input; analysis of how comments influenced the planning process

IV. Summary of Public Participation Activities

FTA Title VI guidance requires a summary of outreach efforts made since the last Title VI Program submission. The following is a summary of transit-related and capital project-related public outreach during this submittal period.

Transit-Related Public Participation

Annual Public Hearing on Transit Needs in Riverside County

As required by Section 99238.5 of the California Public Utilities Code, RCTC holds at least one annual public hearing to solicit input from transit dependent and transit disadvantaged persons. The public hearing is promoted through newspaper notices throughout Riverside County and placed flyers and half-page seat drop flyers on buses, printed in both English and Spanish. Written and oral comments provided at the hearing were used by RCTC and the County's transit operators in identifying transit needs in preparation of transportation plans and programs, including the Regional Transportation Plan and Short-Range Transit Plans. Comments are shared with transit and paratransit operators as they relate to operating issues and needs. Additionally, comments are also shared with other agencies that provide transportation services to transit-dependent populations, including the Coordinated Transportation Services Agencies and the County Office on Aging, and specialized transit providers such as Care-A-Van, Forest Folk, and Operation SafeHouse.

Coordinated Plan 2016 Outreach

During the Coordinated Plan outreach process, five workshops were held in February 2016 in the various areas of Riverside County:

- Blythe for the Palo Verde Valley
- Palm Desert for the Coachella Valley
- Hemet for Western Riverside
- Lake Elsinore for southwestern Riverside County
- Beaumont for the Pass Area

The workshops invited comments regarding transportation needs from transit users and potential transit users, agency staff working with the target populations, and the public. RCTC promoted the workshops

through flyers printed in English and Spanish. Flyers were posted in buses across many of the County's transit routes. RCTC posted the workshop flyers on the RCTC home webpage and Citizens Advisory Committee members distributed the flyers throughout the County. They were also distributed through an email notice to the *Riverside County Transportation Network* which includes non-profits, human and social services, private transportation companies, public agencies, and specialized transit providers. The next Coordinated Plan will be completed by the end of 2020.

North Shore/Mecca Salton Sea Project Development Workshops

As part of the 2016 Coordinated Plan Process, RCTC held a workshop for the residents of the North Shore/Mecca community of the Salton Sea to discuss unmet transit needs and develop responsive solutions. The North Shore/Mecca area is an isolated, rural, and agricultural region in Riverside County. Many residents are agricultural workers and need to travel long distances to work in the fields throughout the area. Other families depend on jobs in the hospitality sector on the west side of the Coachella Valley and many of their children attend the College of the Desert Campus located in Palm Desert. For some, the daily commute can be 36 miles each way.

Simultaneous translation was provided at the meeting to allow RCTC staff and the predominately Spanish-speaking community members to interact. Past meetings have resulted in the implementation of a volunteer driver reimbursement program and weekday and weekend connecting service to the area.

Citizen Advisory Committee (CAC) / Social Services Transportation Advisory Council (SSTAC)

RCTC revamped the Citizen Advisory Committee (CAC) by appointing 10 members in September 2014. The CAC serves as RCTC's Social Services Transportation Advisory Council (SSTAC) to assist the Commission in complying with Transportation Development Act (TDA) Section 99238. The TDA provides direction for administering both Local Transportation Fund and State Transit Assistance funds for bus and commuter rail services. This funding promotes transportation service improvements and enhancements that support the mobility of older adults, persons with disabilities, and persons of limited means.

Additionally, the role of CAC/SSTAC members is to establish an effective communication exchange among Riverside County's public transit operators, its specialized transportation providers, and representatives of its transit dependent population regarding matters of mutual concern. This group meets biannually, or, as necessary.

Riverside County Transportation Network

The *Riverside County Transportation Network* is a list of key stakeholders and includes 184 agencies and organizations. These entities are non-profits, human and social services, private transportation companies, public agencies, specialized transit providers that work with a diverse range of clients throughout Riverside County. The Network is updated on an annual basis, through a mail survey and online e-survey. Transit-Related information, notices, announcements—particularly public participation opportunities—are sent to this Network via emails and physical mail, when those addresses exist.

Capital-Related Public Participation

RCTC has a robust public participation and outreach component for its major highway and rail capital projects. Many of these efforts focus on transparency to allow the public to engage in projects via meetings, helpline, project webpages, and various social media platforms.

Although non-FTA funded, examples of project-specific public outreach plans that either were developed or are currently in use are:

- I-15 Express Lanes Project – Construction of Tolled Express Lanes
- Route 60 Truck Lanes Project – Construction of Dedicated Truck Lanes
- Coachella Valley-San Geronio Pass Rail Corridor Service – Tier 1 Engineering and Environmental Studies

RCTC maintains webpages for all its capital projects. These webpages are available in the “Projects” section of the RCTC website, rctc.org.

Active capital projects also produce collateral material in English and Spanish and hold community meetings with bilingual staff in attendance. To date, staff has not received requests for or encountered people who require translation or interpretation to languages other than Spanish.

RCTC’s Website

RCTC’s website includes current information and notices for all projects and activities. Website addresses are provided on all printed materials.

The Commission also maintains active Facebook, Twitter, and Instagram pages to enhance its public outreach. These social media pages provide information about public meetings, transit options, capital project updates, and other items of interest to Riverside County residents and the transportation industry.

V. Contact information

RCTC posts Title VI general notices and complaint forms on its website at www.rctc.org/about. The Plan may be translated in any language for free upon request. Any questions or comments regarding this Plan should be directed to:

Riverside County Transportation Commission
John Standiford, Deputy Executive Director
4080 Lemon Street, Third Floor
P. O. Box 12008
Riverside, CA 92502-2208
Phone: (951) 787-7141
Email: jstandiford@rctc.org

VI. Attachments

Demographic Maps of Minority Populations in Riverside County

Figure 1: Western Riverside County Minority Population

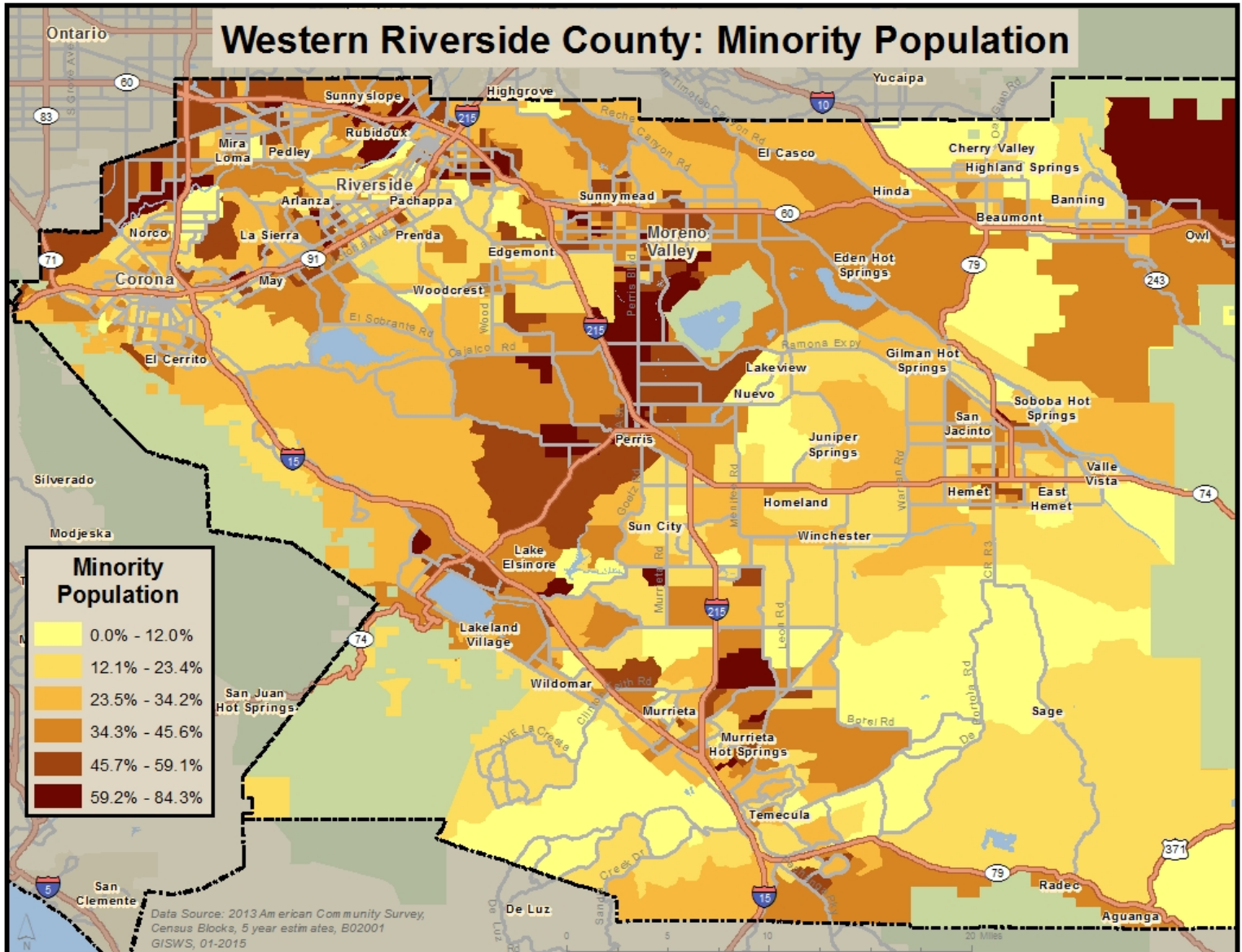


Figure 2: East Riverside County Minority Population

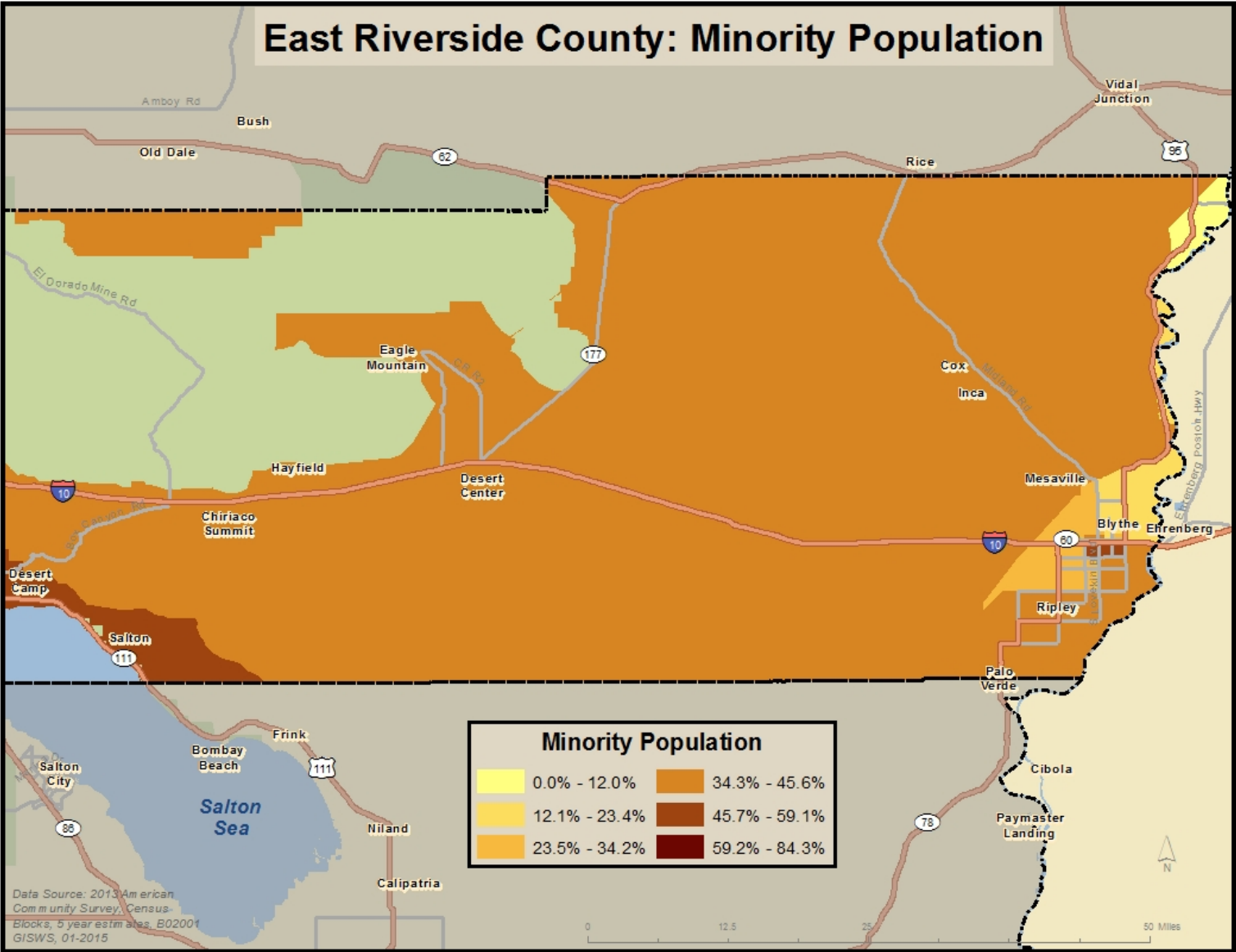
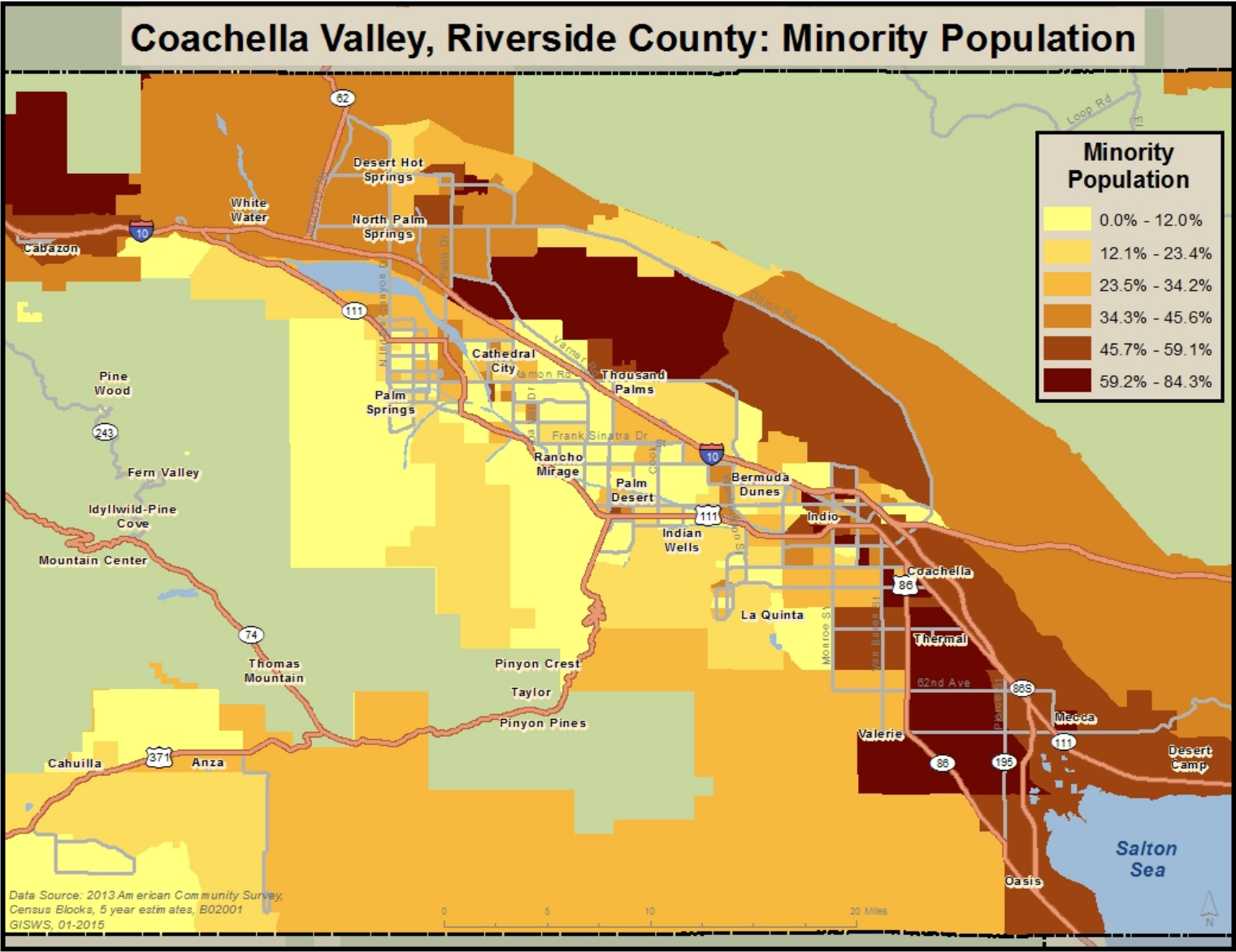


Figure 3: Coachella Valley Minority Population



APPENDIX C

TITLE VI

LANGUAGE ASSISTANCE PLAN



**RIVERSIDE
COUNTY
TRANSPORTATION
COMMISSION**

4080 Lemon Street, 3rd Floor
Riverside, CA 92501

If information is needed in another language, please contact (951) 787-7141 for free translation services.
Si se necesita este documento en Español, llame al 951-787-7141 para servicios de traducción gratuitos.

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I. Introduction

Background of RCTC (Commission)

The Riverside County Transportation Commission (RCTC or “Commission”) was established in 1976 by the State of California (State) to oversee the funding and coordination of all public transportation services within Riverside County. The governing body consists of all five members of the County Board of Supervisors, one elected official from each of the County’s 28 cities, and one non-voting member appointed by the Governor of California. It is the designated Regional Transportation Planning Agency (RTPA) and County Transportation Commission (CTC). Its responsibilities include setting policies, establishing priorities, coordinating activities among the County’s various transit operators and local jurisdictions.

The public is most familiar with RCTC for its involvement in delivering capital projects and motorist aid services including the following:

- ✓ 91 Express Lanes
- ✓ Interstate 15 Express Lanes
- ✓ 15/91 Express Lanes Connector
- ✓ Interstate 15 Express Lanes Southern Extension
- ✓ 15/91 Express Lanes Connector
- ✓ State Route 91 Corridor Operations Project
- ✓ State Route 71/91 Interchange Project
- ✓ State Route 60 Truck Lanes Project
- ✓ Mid-County Parkway/Interstate 215 Placentia Avenue Interchange
- ✓ Interstate 15/Railroad Canyon Interchange Project
- ✓ Interstate 15 Express Lanes Southern Extension
- ✓ State Route 79 Realignment
- ✓ Coachella Valley-San Geronio Pass Rail Corridor Service Project
- ✓ Santa Ana River Trail Extension Projects

RCTC also provides motorist aid services designed to expedite traffic flow. These services include the Freeway Service Patrol (FSP), a roving tow truck service that assists motorists with disabled vehicles on the main highways of the County during peak rush hour traffic periods; the Service Authority for Freeway Emergencies (SAFE), a program that provides call box service for motorists; and Rideshare Programs such as Inland Empire 511 (IE511), a traveler information system, and VanClub, a program to promote vanpooling.

RCTC’s capital projects, motorist aid services and transit-related programs and projects are funded with various local, state, and federal sources. Local funding sources consist of Measure A, the countywide sales tax; debt proceeds, derived from issuing bonds; and Transportation Uniform Mitigation Fees (TUMF),

derived from developer impact fees. State funding sources for projects are derived from the State Transportation Improvement Program (STIP). RCTC also receives apportionments of federal Surface Transportation Program (STP) and Congestion Mitigation Air Quality (CMAQ) funds from the Federal Highway Administration (FHWA); and FTA Small Starts and Sections 5307, 5309, 5337 formula funds. The Commission is unique in that it is not a transit provider like many other CTCs, however, does receive FTA formula funds (under the Rail Program) for transfer and expenditure for the Southern California Regional Rail Authority (SCRRA or Metrolink).

Regardless of funding source, RCTC is committed to ensuring that its projects and services are delivered and implemented in a non-discriminatory manner.

Purpose of this Plan

The Language Assistance Plan (LAP) is intended to satisfy FTA Title VI requirements related to limited-English Proficient (LEP) individuals. FTA Circular 4702.1B states that “recipients shall take reasonable steps to ensure meaningful access to benefits, services, information, and other important portions of their programs and activities for individuals who are limited-English proficient (LEP).” LEP persons refer to those for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. It includes people who reported to the U.S. Census that they speak English less than very well, not well, or not at all.

The LAP details the process by which RCTC will provide access to LEP individuals and the larger community. RCTC utilized the U.S. Department of Transportation’s (DOT) LEP Guidance Handbook and performed a Four Factor Analysis to develop this LAP.

Title VI and Federal Authority

Title VI of the Civil Rights Act of 1964 protects persons in the United States from being excluded from participation in, denied the benefits of, or subjected to discrimination on the basis of race, color, or national origin in any program or activity receiving federal financial assistance. Under the DOT, FTA’s requirements for implementing Title VI include the adoption of a Title VI Program report pursuant to FTA Circular 4702.1B, *Title VI Requirements and Guidelines for Federal Transit Administration Recipients*. As a recipient of FTA Funds, RCTC has developed its own Language Assistance Plan in compliance with FTA Circular 4702.1B and through consultation with the FTA’s Office of Civil Rights’ LEP Guidance Handbook: *The FTA’s Office of Civil Rights’ Implementing the Department of Transportation’s Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient (LEP) Persons: A Handbook for Public Transportation Providers* (April 13, 2007).

Language Assistance Goals

The following goals will guide RCTC in ensuring that projects and services are delivered and implemented in a non-discriminatory manner:

1. Ensure meaningful access to all individuals regardless of race, color, national origin, and language of origin through outreach to LEP populations, translation of vital documents into LEP languages, and provision of additional language assistance services, as required;
2. Monitor changing LEP population demographics as necessary to ensure RCTC provides appropriate language assistance services;
3. Update this Language Assistance Plan as necessary to ensure the effectiveness of strategies for providing language assistance.

II. Four Factor Analysis

Recipients are required to take reasonable steps to ensure meaningful access to benefits, services, information, and other important portions of its programs or activities for persons who are limited-English proficient (LEP). FTA Circular 4702.1B details the components of the LAP, including the Four Factor Analysis, which provides a careful analysis of LEP individuals the recipient may encounter to determine the specific language services that are appropriate to provide.

The Four Factor Analysis balances the following factors:

- Factor One: The number and proportion of LEP persons in the jurisdiction;
- Factor Two: How often LEP persons come into contact with RCTC services;
- Factor Three: How important RCTC's services are to the lives of LEP persons;
- Factor Four: The resources available to RCTC for LEP outreach that reasonably can be provided.

The results of the four-factor analysis are used to determine the target LEP populations and the best methods of engaging with the public. RCTC undertook the Four Factor Analysis in order to develop an appropriate and effective Language Assistance Plan

Factor One: The number or proportion of LEP persons eligible to be served or likely to be encountered

RCTC's service area incorporates all Riverside County, which has a total population of 2,423,266 individuals according to American Community Survey (ACS) 2017 1-year estimates. ACS Census data was used for this analysis as it provides the most current and reliable information about LEP individuals. The Department of Justice's Safe Harbor provision, which was accepted by the FTA, stipulates that written translation of vital documents for each eligible LEP language group that constitutes 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, shall be considered strong evidence of compliance with the recipient's written translation obligation.

Table 1 below provides information from the 2016 American Community Survey 5-year Estimates demonstrating the 38 LEP populations in Riverside County, using 5-year estimates as they provide the most reliable data in terms of LEP populations. The largest group of LEP individuals is Spanish speakers, who comprise 13 percent of the County's population and number 268,982 individuals. Although no other LEP group reaches 5 percent of the population, 14 additional LEP groups have over 1,000 persons, which include: Arabic, Chinese, Gujarati, Korean, Khmer, other Indo-European, Ilocano-Samoan-Hawaiian or other Austronesian, Persian, Punjabi, Spanish, Tagalog, Thai-Lao or other Tai Kalai, and Vietnamese.

Table 1, Riverside County LEP Population

Table B16001: LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER 2017 American Community Survey 1-Year Estimates	Estimate	% to Total # of Population	Margin of Error
Total Population (ACS 2017 1 Year Estimates):	2,264,417	100.00%	+/-394
Speak only English	1,343,253	59.32%	+/-18,260
Spanish: Speak English less than "very well"	291,220	12.86%	+/-7,431
French (incl. Cajun): Speak English less than "very well"	459	0.02%	+/-292
Haitian: Speak English less than "very well"	79	0.00%	+/-132
Italian: Speak English less than "very well"	275	0.01%	+/-236
Portuguese: Speak English less than "very well"	617	0.03%	+/-432
German: Speak English less than "very well"	750	0.03%	+/-333
Yiddish, Pennsylvania Dutch or other West Germanic languages: Speak English less than "very well"	37	0.00%	+/-46
Greek: Speak English less than "very well"	80	0.00%	+/-132
Russian: Speak English less than "very well"	178	0.01%	+/-204
Polish: Speak English less than "very well"	0	0.00%	+/-210
Serbo-Croatian: Speak English less than "very well"	123	0.01%	+/-145
Ukrainian or other Slavic languages: Speak English less than "very well"	131	0.01%	+/-170
Armenian: Speak English less than "very well"	421	0.02%	+/-357
Persian (incl. Farsi, Dari): Speak English less than "very well"	1,394	0.06%	+/-1,156
Gujarati: Speak English less than "very well"	404	0.02%	+/-415
Hindi: Speak English less than "very well"	0	0.00%	+/-210
Urdu: Speak English less than "very well"	621	0.03%	+/-583
Punjabi: Speak English less than "very well"	1,413	0.06%	+/-1,132
Bengali: Speak English less than "very well"	146	0.01%	+/-231
Nepali, Marathi, or other Indic languages: Speak English less than "very well"	314	0.01%	+/-251
Other Indo-European languages: Speak English less than "very well"	1,371	0.06%	+/-896
Telugu: Speak English less than "very well"	130	0.01%	+/-214
Tamil: Speak English less than "very well"	257	0.01%	+/-279

Table B16001: LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER 2017 American Community Survey 1-Year Estimates	Estimate	% to Total # of Population	Margin of Error
Malayalam, Kannada, or other Dravidian languages: Speak English less than "very well"	281	0.01%	+/-276
Chinese (incl. Mandarin, Cantonese): Speak English less than "very well"	11,602	0.51%	+/-2,726
Japanese: Speak English less than "very well"	568	0.03%	+/-283
Korean: Speak English less than "very well"	4,037	0.18%	+/-1,594
Hmong: Speak English less than "very well"	981	0.04%	+/-821
Vietnamese: Speak English less than "very well"	8,263	0.36%	+/-1,854
Khmer: Speak English less than "very well"	1,623	0.07%	+/-1,190
Thai, Lao, or other Tai-Kadai languages: Speak English less than "very well"	1,883	0.08%	+/-932
Other languages of Asia: Speak English less than "very well"	50	0.00%	+/-81
Tagalog (incl. Filipino): Speak English less than "very well"	12,873	0.57%	+/-2,381
Ilocano, Samoan, Hawaiian, or other Austronesian languages: Speak English less than "very well"	1,348	0.06%	+/-854
Arabic: Speak English less than "very well"	4,076	0.18%	+/-1,753
Hebrew: Speak English less than "very well"	553	0.02%	+/-893
Amharic, Somali, or other Afro-Asiatic languages: Speak English less than "very well"	181	0.01%	+/-223
Yoruba, Twi, Igbo, or other languages of Western Africa: Speak English less than "very well"	65	0.00%	+/-80
Swahili or other languages of Central, Eastern, and Southern Africa: Speak English less than "very well"	0	0.00%	+/-210
Navajo: Speak English less than "very well"	0	0.00%	+/-210
Other Native languages of North America: Speak English less than "very well"	0	0.00%	+/-210
Other and unspecified languages: Speak English less than "very well"	373	0.02%	+/-417

As all individuals residing in the county may be commuters, transit riders, and pedestrians, the total population is eligible to be served by the Commission's services. The following section addresses which LEP persons the Commission is likely to encounter based on the past frequency of contact.

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

To identify and analyze the frequency with which LEP persons come into contact with these programs, a survey was distributed to staff who regularly and is more likely to interact with members of the public. The units that were surveyed include the Clerk of the Board, Public Affairs, Front Reception, Capital Projects, and Commuter Assistance. The survey asked staff members about their experiences with LEP individuals, including how frequently they interacted with LEP persons, what languages the LEP individuals spoke, how successfully they communicated, and what information LEP persons were seeking.

Most respondents noted very rare to no interaction with LEP individuals in the last year, with the exception of the Front Receptionist, who encounters Spanish inquiries on a daily basis. The most common requests are for information about other County services in the building, RCTC project-specific construction information, and information about Metrolink services (not under the purview of the Commission). Staff members have been able to communicate with LEP individuals through assistance from bilingual staff members, translators, and through hand gestures and drawings. RCTC also has an on-call contract with PALS for Health, a translation/interpretation service based in southern California.

In conclusion, Factor Two identified that RCTC does not frequently come into contact with LEP individuals regarding its services and programs, but of those that are received, most are likely to speak Spanish.

Factor Three: The nature and importance of the program, activity, or service to people's lives

RCTC is a state-mandated countywide agency tasked with the funding and coordination of all public transportation services within Riverside County, which includes 28 cities, 7,208 square miles, and 2,423,266 individuals, according to the 2017 American Community Survey. The Commission's mission is to assume a leadership role in improving mobility in the County and is responsible for setting policies, establishing priorities, and coordinating activities among the County's various transit operators and other agencies. The Commission also programs and/or reviews the allocation of federal, state, and local funds for highway, transit, rail, non-motorized travel (bicycle and pedestrian), and other transportation activities. The Commission serves as the tax authority and implementation agency for Measure A, the voter-approved half-cent sales tax for transportation improvements in Riverside County. The Commission also provides motorist aid services designed to expedite traffic flow. The Commission is also legally responsible for allocating Transportation Development Act (TDA) funds, the major source of funds for transit in the County. Finally, the Commission has been designated as the Congestion Management Agency (CMA) for the County. As the CMA, the Commission coordinates with local jurisdictions in the establishment of congestion mitigation procedures for the County's roadway system.

RCTC works to ensure and improve the quality of life of Riverside County’s residents. Transportation interacts with a variety of human needs including a safe environment with better air quality, a reduction in water runoff, reducing the levels of greenhouse gases, and supporting transportation alternatives that promote better health through walking or bicycling. By taking a more holistic approach, the importance of transportation grows larger and is valued as a vital necessity.

Factor Four: The resources available to the recipient for LEP outreach

RCTC has numerous resources available to ensure it provides meaningful access to LEP individuals. These include existing community partners, using its own resources, and using contracted services. These resources are detailed below:

- RCTC contracts with PALS for Health to provide written translation and oral interpretation for LEP individuals.
- Bilingual employees provide written translation and oral interpretation.
- “I Speak” language identification cards are used at the front desk and at public meetings.
- Language assistance information is provided on agendas and meeting notices.
- Public notices are translated into Spanish.
- RCTC may contract with public outreach firms that can provide language assistance as needed.
- Riverside Transportation Network: This database ensures agencies and organizations that work with LEP individuals are provided the Commission’s information and notices to distribute to their clients.
- CAC/SSTAC- Many members of the CAC/SSTAC represent underrepresented minority groups and are a useful resource for outreach to LEP individuals.
- Riverside County Transit Operators: RCTC may partner with transit operators to post vital information in English and Spanish on buses and at transfer locations.
- The Southern California Association of Government’s LEP Plan, Public Participation Plan, and existing translated resources can provide materials for LEP outreach and communication.
- RCTC translates Title VI vital documents and project-specific vital information into Spanish.
- RCTC’s website provides outreach and is equipped with a Google translator.

Discussion of Results

Census data analyzed in Factor One was consistent with the experience of RCTC staff members analyzed in Factor Two to determine that Spanish-speaking LEP individuals are the largest and most frequent LEP group that accesses RCTC’s services and programs. As these individuals comprise 13 percent of Riverside County’s population, it will be important for the Commission to continue providing vital documents in Spanish. Additional LEP groups are very small populations (less than 1 percent of the population), not yet identified (Other Indic Languages, for example), and do not frequently access the Commission’s services or programs, documents will be translated as requested or as is appropriate for a specific project. Details of language assistance services are provided in the following Implementation Plan.

III. Implementation Plan

Language Service Provision

RCTC will provide the following language assistance measures to ensure LEP individuals have full access to the Commissions services, programs, and activities:

Callers and Visitors

- Front desk staff have “I Speak” language identification cards available to assist LEP individuals.
- Several employees are bilingual and can help callers or visitors that speak Spanish.
- RCTC contracts with Language Line Solutions, a language service provider, to provide simultaneous translation as needed. Language Line can be accessed by any staff member for translation services by calling 888-808-9008. The staff member can then put an LEP individual in touch with a translator for correspondence.
- RCTC contracts with PALS for Health to provide written translation and oral interpretation for LEP individuals. RCTC requests in writing the material to be translated to Spanish, requests staffing for public meetings, or arranges for telephone translation services, upon request.

Translation of Vital Documents

FTA Circular 4702.1B defines vital documents as, “documents that provide access to essential services.” The Commission will use this definition when assessing what documents should be translated.

Title VI Documents are vital documents. The Title VI notice to the public, complaint form, and procedures are available in English and Spanish, the LEP language that RCTC is most likely to encounter. Vital documents are available on RCTC’s website and at the front desk. Information about the availability of free language assistance is available on posted notices and agendas in Spanish.

Spanish-Language Translation: RCTC provides project notices and announcements and vital documents in Spanish and will continue to do so, as the Spanish-speaking LEP population represents a significant portion of Riverside County’s population. Documents that are translated include: notices and announcements about public meetings and forums and public participation opportunities, key information distributed at project meetings, and any vital project-specific meetings.

Other LEP Language Translations: The additional LEP languages represent very small communities and vital information will be translated as requested and as appropriate, with decisions made on a project-by-project basis. For example, if a project takes place in a community with a large LEP population, key information for that project will be translated into that LEP language.

Oral Interpretation: Oral interpretation will be provided at public meetings as requested and appropriate. Decisions will be made on a project-by-project basis. Notices of public meetings and forums include information about how to request oral interpretation.

Outreach/Notice of Availability of Language Assistance RCTC's Title VI Notice to the Public publicizes its language assistance services. Additionally, other notices may include the statement, *"If information is needed in another language, please contact (951) 787-7141 for free translation services."*

Staff Training

Outreach and front desk staff are trained in assisting LEP individuals, including identifying language and using the language service provider interpretation system. Training is provided for new employees and reoccurs as necessary.

LEP training includes:

- A summary of RCTC's language assistance requirements DOT LEP Guidance;
- A summary of the Commission's language assistance plan; including responding to LEP persons
- Results of RCTC's Four Factor Analysis, including a summary of the LEP individuals in Riverside County and the frequency of contact between the LEP population and the Commission
- A description of the Commission's non-discrimination policies and practices.

IV. Monitoring, Evaluating, and Updating the LAP

A thorough review of the LAP will be undertaken every three years, or as necessary as guidelines are revised or as compliance reviews warrant. At that time, the LEP population will be reassessed to ensure all significant LEP languages are included in RCTC's language assistance efforts. The following reoccurring reporting and evaluation measures will be used to update the Language Assistance Plan:

1. RCTC will regularly assess the effectiveness of how the Commission communicates with LEP individuals by working with community stakeholders, such as the CAC/SSTAC, the Riverside Transit Network, County transit operators, non-profit agencies, among others.
2. Commission staff will track its language assistance efforts, including:
 - Tracking front desk staff interaction with LEP persons
 - Internal surveys of staff who are likely to engage with the public
 - Number of downloaded documents in other languages
 - Reports and updates from the language service provider
 - Requests for translation and interpretation

V. Contact information

RCTC will post the approved LAP on its website at www.rctc.org. The LAP may be translated in any language for free upon request.

Any questions or comments regarding the LAP should be directed to:

Riverside County Transportation Commission
John Standiford, Deputy Executive Director
4080 Lemon Street, Third Floor
P. O. Box 12008
Riverside, CA 92502-2208
Phone: (951) 787-7141
Email: jstandiford@rctc.org