



2021-2023 TITLE VI PROGRAM

Adopted by City of Corona Council (Insert Date)

CITY OF CORONA TRANSIT SERVICE

Guiding Principle

City of Corona Transit Service believes that sustainable public transportation options are essential to ensuring mobility in the community.

Mission Statement

City of Corona Transit Service's mission is to provide a clean, safe, accessible, reliable and friendly transportation system that improves the quality of life in the community.

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I. OVERVIEW

Purpose

Title VI of the Civil Rights Act of 1964 is a Federal law that prohibits recipients and subrecipients of Federal financial assistance (e.g., states, local governments, transit providers) from discriminating on the basis of race, color, or national origin in their programs or activities, and obligates Federal funding agencies to enforce compliance. Under Title VI, Department of Transportation (DOT) has the responsibility to provide oversight of recipients and to enforce their compliance with Title VI, to ensure that recipients do not use DOT funds to subsidize discrimination based on race, color, or national origin.

Per the FTA's Title VI Circular 4702.1B, October 1, 2012, as a recipient of Federal Transit Administration (FTA) funds, City of Corona Transit Service (CCTS) is required to prepare and update its Title VI Program. The 2021-2023 Title VI program reflects the City of Corona Transit Service's commitment to ensuring that no person shall, on the grounds of race, color, or national origin be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any City of Corona Transit Service program, activity, or service.

The 2021-2023 Title VI program supersedes CCTS's Title VI Program of 2018-2020. This program was revised in conformance with FTA Title VI guidelines as referenced in FTA Circular 4702.1B and as such, the Title VI Program includes the following General and Transit-specific requirements:

A. General Requirements

- Title VI Notice to the Public
- Title VI Complaint Procedures and Complaint Form
- List of transit-related Title VI investigations, complaints, and lawsuits
- Public Participation Plan
- Limited English proficiency (LEP)
- Racial Breakdown of Non-elected Advisory Council
- Subrecipient Monitoring
- Title VI equity analysis
- Board of Directors Resolution or Meeting Minutes

B. Requirements of Fixed Route Transit Providers

- Service standards
 - Vehicle load for each mode
 - Vehicle headway for each mode
 - On time performance for each mode
 - Service availability for each mode
- Service policies
 - Transit Amenities for each mode
 - Vehicle Assignment for each mode

II. CITY OF CORONA TRANSIT SERVICE

A. BACKGROUND

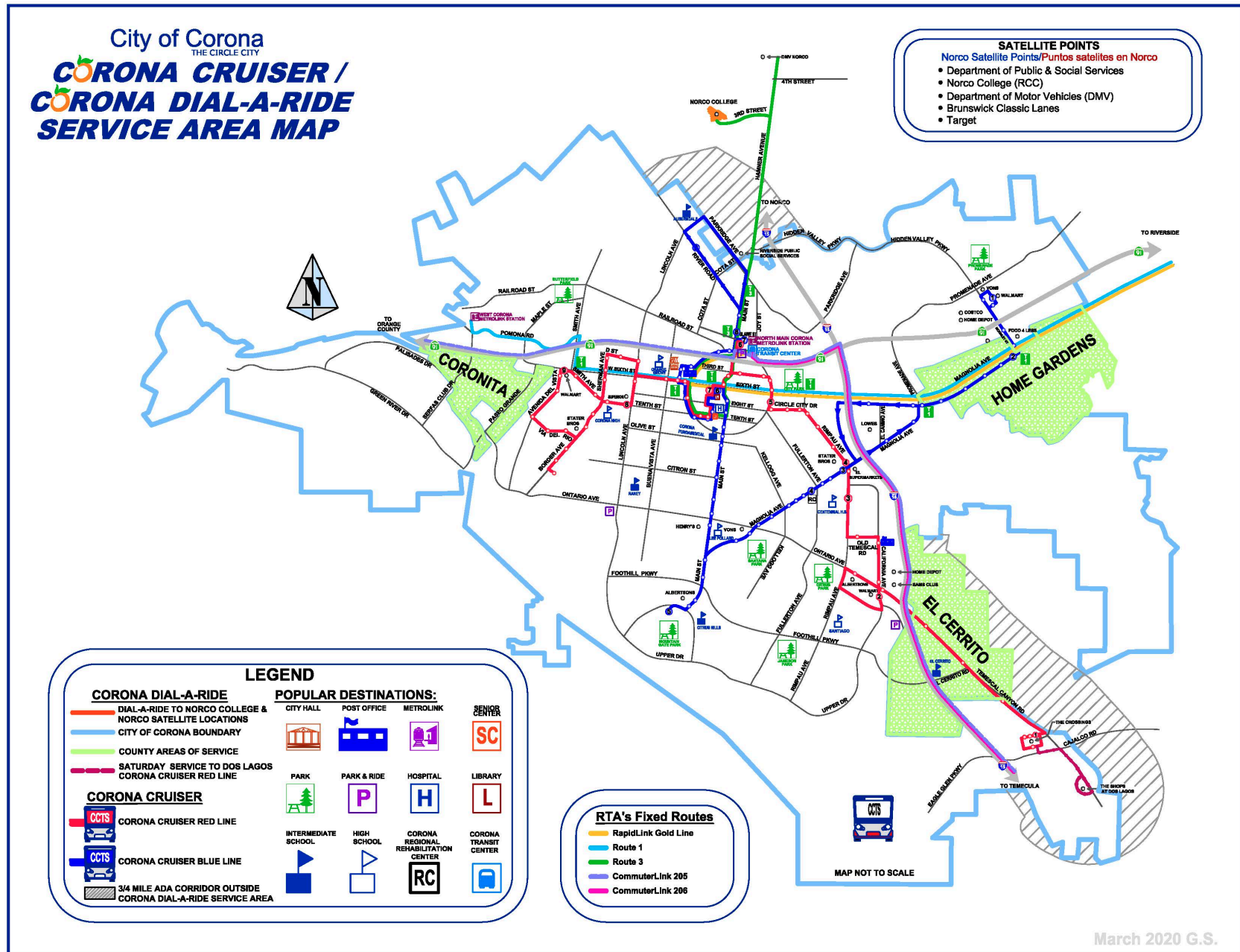
City of Corona Transit Service operates a demand response/paratransit Dial-A-Ride and fixed route service known as the Corona Cruiser. Dial-A-Ride service commenced in 1977 and provides curb-to-curb service throughout the City of Corona and neighboring county areas of Coronita, El Cerrito, and Home Gardens as well as satellite locations in the city of Norco. The complementary paratransit Dial-A-Ride service area extends beyond city limits to ensure compliance with the Americans with Disabilities Act ¾ mile corridor around a Corona Cruiser fixed route. Door-to-door service is available upon request for riders certified under the Americans with Disabilities Act (see service area map – Figure 1).

Corona Cruiser fixed route service began in 2001 and serves the city-center as well as commercial, retail, and residential areas on the eastern and southern portion of the city. Fixed route service operates along two routes – the Red Line and Blue Line – using six buses during peak service. City of Corona Transit Service serves the City of Corona and neighboring incorporating Riverside County, an area with a population of approximately 150,000 residents (see service area map – Figure 1).

The following public transit services are also available to Corona residents:

- Riverside Transit Agency – regional public transit agency providing fixed route via the following routes: 1; 3; 12; Rapidlink Goldline; Commuter Links 205/206; and Dial-A-Ride serving seniors and persons with disabilities.
- Southern California Regional Rail Authority (Metrolink) – provides commuter rail service to Los Angeles and Orange counties via the 91 Line and Inland Empire Orange County Line respectively.
- Orange County Transportation Authority – provides express, peak hour bus service between Orange and Riverside counties.

Figure 1



B. TITLE VI POLICY

The City of Corona Transit Service (CCTS) is committed to ensuring that no person is excluded from participation in, denied the benefits of, or otherwise subjected to discrimination under any of its programs, activities, or services on the basis of race, color, or national origin. All persons, regardless of their citizenship, are covered under this regulation. In addition, City of Corona Transit Service prohibits discrimination on the basis of race, color, or national origin in its employment and business opportunities.

City of Corona Transit Service will not condone retaliation against an individual for their involvement in asserting their rights pursuant to the Title VI or because they filed a complaint or participated in an investigation under Title VI, and/or this regulation.

As a Federal Transit Administration (FTA) fund recipient, City of Corona Transit Service will ensure that its program, policies, and activities comply with the U.S. Department of Transportation (DOT) Title VI Regulations of the Civil Rights Act of 1964. City of Corona Transit Service will ensure that the level and quality of its transportation service is provided without regard to race, color, or national origin.

City of Corona Transit Service will make good faith and reasonable efforts to achieve environmental justice as part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, activities, and services on minority and low-income populations within the City of Corona Transit Service area.

City of Corona Transit Service operates fewer than 50 buses in peak service, and thus is not required to:

- Provide demographic and service profile maps and charts
- Collect and report survey data regarding customer demographics and travel patterns
- Evaluate service and fare equity changes
- Monitor transit service

C. APPLICABILITY

The policy is applicable to City of Corona Transit Service employees, contract operator employees, and members of the public. City of Corona Transit Service will carry out its programs, activities, and services in compliance with Title VI of the Civil Rights Act of 1964. City of Corona Transit Service employees and contract operator employees will not, on the grounds of race, color, or national origin exclude any person from participating in, deny the benefits of, or subject anyone to discrimination under any City of Corona Transit Service program, activity, or service.

City of Corona Transit Service or any of its employees or contract operator employees will not, on the grounds of race, color, or national origin:

- a) Provide any service, financial aid, or benefit that is different from that provided to others;
- b) Subject an individual to segregation or separate treatment;
- c) Restrict an individual in the enjoyment of any advantage or privilege enjoyed by others;

- d) Deny any individual service, financial aid, or benefits under any City of Corona Transit Service program, service, or activity;
- e) Treat individuals differently in terms of whether they satisfy admission or eligibility requirements; and
- f) Deny an individual the opportunity to participate as a member of a planning or advisory body.

Failure of a City of Corona Transit Service employee or contract operator employee to follow this policy and procedure may subject such employee(s) to disciplinary action up to and including employment termination.

III. GENERAL REQUIREMENTS

A. TITLE VI NOTICES TO THE PUBLIC

Figure 2 displays the CCTS Title VI Notice to the Public. The CCTS Title VI Notice to the Public (English and Spanish version) is posted at the following locations:

Location of Notices to the Public

Location Name	Address	City
Corona City Hall / City Clerk's Office	400 S. Vicentia Avenue, 1 st Floor	Corona
Corona City Hall / Public Works Dept.	400 S. Vicentia Avenue, 2 nd Floor, Suite 210	Corona
Non-advertising passenger shelters	23 locations city-wide	Corona
MV Transportation	735 Public Safety Way, 1 st Floor	Corona
On-board buses	N/A	
Corona Cruiser and Dial-A-Ride brochures/schedules	N/A	

The Title VI Notice to the Public and program information is also provided on the CCTS website at: www.CoronaCA.gov/transit

The notice contains a commitment to ensuring that no person is excluded from participation in, or denied the benefits of its services on the basis of race, color, or national origin as protected by Title VI; details about how to get more information about Title VI; and instructions for filing a Title VI complaint. It includes CCTS' mailing address, telephone number, online contact information, and email address, and is presented in English and Spanish.

Figure 2 - CCTS Title VI Notice to the Public

NOTICE

Notifying the Public of Rights Under Title VI

The City of Corona Transit Service (CCTS) operates its programs, activities, and services without regard to race, color, or national origin in accordance with Title VI of the Civil Rights Act. Any person who believes he or she has been subjected to any unlawful discriminatory practice protected under Title VI may file a complaint with the CCTS.

For more information on CCTS' Title VI program, and the procedures to file a complaint, contact the City of Corona Public Works Department via telephone at (951) 736-2266, via email at publwks@CoronaCA.gov, online at www.CoronaCA.gov/Transit, or visit the Public Works Department at 400 S. Vicentia Avenue, Suite 210, Corona, CA 92822.

A complaint may also be filed directly with the Federal Transit Administration by submitted a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Avenue, Washington DC 20590.

AVISO

Notificación al Público de Derechos Bajo el Title VI

El Servicio de Tránsito de la Ciudad de Corona (CCTS) opera sus programas, actividades y servicios, sin distinción de raza, color u origen nacional, en conformidad con el Título VI de la Ley de Derechos Civiles. Cualquier persona que cree que él o ella ha sido objeto de cualquier práctica discriminatoria ilegal protegida en virtud del Title VI, puede presentar una queja ante el CCTS.

Para obtener más información sobre el programa del Título VI del CCTS, y los procedimientos para presentar una queja, póngase en contacto con el Departamento de Obras Públicas de la Ciudad de Corona por teléfono al (951) 736-2266, por correo electrónico a publwks@CoronaCA.gov, en línea en www.CoronaCA.gov/Transit, o visite el Departamento de Obras Públicas en 400 S. Vicentia Avenue, Suite 210, Corona, CA 92822.

Una queja se puede presentarse directamente con la Federal Transit Administration mediante la presentación de una queja ante la Office of Civil Rights (Oficina de Derechos Civiles), Atención: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Avenue, Washington DC 20590.

B. TITLE VI COMPLAINT PROCEDURES

Any person who believes that he/she, or as a member of any specific class of individuals, has been subjected to discrimination on the basis of race, color, national origin, age sex, sexual orientation, or gender identity with respect to CCTS programs, activities, services, or other transit related benefits, may file a written Complaint with CCTS or FTA Office of Civil Rights. A Complaint may be filed by the individual or by a representative. A Complaint must be filed within 180 days after the date of the alleged discrimination, but complainants are encouraged to submit complaints as soon as possible. CCTS will promptly investigate all Complaints filed under Title VI, pursuant to this Regulation.

Appendix A and B contains the CCTS' Title VI Complaint Procedures and Appendix C and D contains the Title VI Complaint Form. This information and the accompanying complaint form are also provided on the CCTS website and is available both in English and Spanish.

C. TRANSIT-RELATED TITLE VI INVESTIGATIONS, COMPLAINTS, AND LAWSUITS

CCTS maintains a log of any Title VI complaints, investigations, or lawsuits. No complaints have been filed against CCTS regarding Title VI since the last Title VI submission. Currently, no active complaints, investigations, or lawsuits have been filed against CCTS. Appendix E includes the complaint log.

D. PUBLIC PARTICIPATION PLAN

Promoting public participation is an important element of a transit agency's Title VI program. Recipients have wide latitude in determining public participation activities. The Southern California Association of Governments (SCAG) is the metropolitan planning organization (MPO) for the Southern California region including the County of Riverside. SCAG is responsible for developing long range transportation, and environmental plans for the region. City of Corona Transit Service relies on SCAG's Public Participation Plan to ensure compliance with applicable Title VI regulations in reference to projects that have regional impact.

However, for projects impacting only City of Corona Transit Service (CCTS) area, the agency has its own public participation process. CCTS recognizes the importance of involving the public in the planning and implementation of transit services. The goals of CCTS' public involvement plan are to ensure that:

- Residents are given the opportunity to participate in the transportation planning process;
- To develop effective means of engaging minority and Limited-English-Proficient (LEP) populations and other constituencies that are traditionally underserved, including people with disabilities and low-income populations; and
- The issues and concerns of residents are given consideration in the selection of transportation investments.

1. Public Participation Principles

When planning for public engagement, CCTS will incorporate strategies intended to promote involvement of minority and LEP individuals in public participation activities, as appropriate for the plan, project, or service in question, and consistent with federal Title VI regulations, Executive Order 13166 on Limited English Proficiency, and the U.S. Department of Transportation LEP Guidance.

At a minimum, CCTS staff will implement strategies such as holding public meetings in locations that are accessible to transit riders and people with disabilities, scheduling meetings at times that are convenient for members of the public, advertising meetings and hearings in the primary languages spoken in the service area as identified in the updated LEP Plan, and providing notice of the availability of language assistance.

The following principles will be used to develop the Public Involvement Plan for CCTS projects and programs:

- CCTS will determine what non-English languages and other barriers may exist to public participation within the service area.
- CCTS will provide a general notification of meetings, particularly forums for public input, in a manner that is understandable to all populations in the area.
- Public meetings will be held in locations that are accessible to transit riders and people with disabilities, and will be scheduled at times that are convenient for members of the public.
- Public meetings and hearings will be broadly advertised in the community in non-English languages identified in the LEP Plan through printed materials onboard buses (e.g., interior cards, flyers, and/or comment cards) describing the proposed changes as well as at major transit stops, local print media, and local community centers such as the Corona Senior Center
- CCTS will provide notification regarding the availability of language assistance at public meeting as described in the LEP Plan

2. Targeted Public Outreach to Minority and Limited English Proficient (LEP) Populations

Public outreach serves many purposes and is multi-layered. The CCTS uses public outreach to apprise riders of temporary stop closures, special events, Title VI protections, and to solicit and inform riders' how, where and when they can participate in the CCTS decision-making process including fare and major service changes. Public outreach methods range from on-board notices and rider alerts to community meetings and public hearings. Outreach efforts include the dissemination of information about CCTS services through promotional/informational material distributed at schools, major trip generators and online as well as through partnerships with local and regional agencies who, in turn, inform their constituents about CCTS transit service.

To ensure inclusive public participation among minority, low-income and senior persons, CCTS will utilize the following strategies:

- Locate meetings at transit accessible and ADA compliant venues
- Partnered with local and regional agencies which primarily serve minority, low-income and senior persons to disseminate fare media and information:
 - Riverside County agencies
 - Riverside County Department of Public Social Services
 - Riverside County Department of Mental Health
 - Riverside County Transportation Commission
 - Riverside County Library/Home Gardens Branch

- Riverside Transit Agency Transportation NOW Committee
 - Educational Institutions (i.e. school districts, high schools, library)
 - Community organizations (i.e. senior center)
- Utilize newspaper ads that serve LEP populations with circulation in the area associated with CCTS service area
- Consider information dissemination through various communication methods including:
 - Online Transportation website – providing service description, schedule, fare matrix and Title VI information
 - Use of Inner Circle Corona, resource for local news, information, events and community alerts
 - On-board bus surveys
 - Participation in various community events such as Senior Center Health Fair
 - On-board interior bus cards
 - Use of social media

3. Past Public Outreach Efforts

Like most transit systems, CCTS conducts public outreach primarily during planning studies or when major changes to the transit service are being considered or proposed. While CCTS has not had any major service or fare change for fixed route service, however, recently in 2018, changes were made to the Dial-A-Ride Program. City Council approved the change from general public Dial-A-Ride to specialized service for seniors 60 and older, persons with disabilities and ADA certified individuals.

CCTS communicated changes to the DAR service with as many passengers/citizens as reasonably possible. Public comment process informing passengers/citizens of public outreach/informational meeting(s) included the following:

- Informational flyers and posters distributed/displayed on board buses
- Newspaper advertisements announcing the proposed service change and public meetings in the Press Enterprise and La Prensa (Spanish)
- Notice on City website
- Letters to the DAR users regarding outreach meetings and public hearing
- Notification to following organizations: Riverside County Transportation Commission; Riverside Transit Authority (RTA);, RTA T-Now group; Metrolink; Corona-Norco Unified School District; City of Corona Senior Center and various adult day care centers.
- Three informational public outreach meetings were held; Spanish-speaking personnel was available at each meeting
- Public hearing before the City Council where service changes were considered
- For those unable to attend a meeting, comments were received via mail, telephone, and email

Other outreach efforts include on-board survey. Last survey was conducted May 2017. Survey was scheduled for March 2020 plus an additional customer satisfaction survey as part of the Comprehensive

Operations Analysis but these efforts were put on hold due to the effects of COVID-19 pandemic on public transit service. Significant reduction in ridership will not result in good data.

The survey that was conducted May 2017 consisted of twenty-two questions which collected information about trip purposed, trip origin and destination, customer demographic information, and customer opinion. A total of 94 surveys were received and analyzed. The survey was two-sided with English version on one side and the Spanish version on the other. Twenty-one percent of survey respondents answered the Spanish-language survey.

The goal of the survey was to provide data concerning CCTS bus riders' demographic, travel patterns and levels of satisfaction. The surveys were available on-board buses; pencils and collection envelopes were provided at both front and rear-end of the buses. Operators while en-route, announced and encouraged riders to fill out the surveys. Key findings are summarized in the following paragraphs.

CCTS riders are using transit for various reasons, including work, medical trips, and shopping. Majority of the respondents are within ½ to 2 blocks of walking distance to the bus stop. In terms of demographics, the largest respondents were female (75%). CCTS riders are of all ages, but 35 percent of the respondents reported the age of 65 and over. The most common ethnicity is Hispanic/Latino, accounting for 50 percent of all riders. While 23% respondents speak Spanish, 92 percent of the respondents stated that they speak English "Very Well" or "Well."

Passengers were asked for number of vehicles available to their household. While 50 percent responded that a vehicle was available, 86 percent of the passengers responded that they did not have access to it. Therefore, if the bus were not available, 31 percent "would not make the trip" and the other 29 percent would walk/wheelchair. Majority of the respondents have been using Corona Cruiser for more than 5 years (~40%) and use the service from 3-5 days a week.

Overall, CCTS riders are pleased with the service. Over 85% of the respondents either "Agree" or "Strongly Agree" with the following statements:

- CCTS takes me where I need to go
- Schedule information is easy to use
- I feel safe riding the bus
- Buses are clean
- Drivers are helpful and friendly

Increased weekend service, improved frequency and late weekday service and improved on-time performance were the most requested improvements.

4. Summary

The range of public participation strategies and actions included in this plan can engage diverse communities and create ongoing public access, participation and input throughout any study or plan. Each public outreach process will engage varied stakeholders: (residents, businesses, transit users, elected officials, local area organizations and others).

E. LIMITED ENGLISH PROFICIENCY (LEP) PLAN

Individuals who have a limited ability to read, write, speak or understand English are Limited English Proficient or “LEP” as defined in the FTA Title VI regulations. CCTS supports the goals of Title VI of the Civil Rights Act of 1964, Federal Executive Order 13166 and the Department of Transportation's (USDOT) Limited English Proficiency (LEP) Guidelines by making reasonable accommodations for those individuals with limited English proficiency (LEP) and by providing meaningful access to our services and programs to LEP individuals. CCTS developed this LEP Plan to help identify reasonable steps for providing language assistance to persons with limited English proficiency.

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

Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient.

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

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

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

The Four Factor Analysis is used to determine the specific language services that are appropriate to provide to ensure meaningful access to programs and activities. A summary of the results of City of Corona Transit Service four-factor analysis is in the following sections. The analysis uses data from the 2014-18 five-year American Community Survey, which has the largest sample size and most reliable data of any current source.

The analysis provided in this report has been developed in order to ensure that CCTS provides language assistance to LEP persons. The following section reports the results of the “Four Factor Analysis” included in FTA Circular 4702.1B, followed by the Language Assistance Plan for CCTS.

Within CCTS’ service area, Table 1 represents LEP persons by language group and the percentage of LEP persons in the City of Corona who meet the Department of Justice (DOJ) Safe Harbor provision of “every 1,000 speakers or five percent of the population which is less.”

Table 1: Language Proficiency in the CCTS Service Area

Languages Spoken and English Proficiency	Population Age 5 and Older	Percent of Population Age 5 and Over
Total:	154,615	100%
Speak only English	91,314	59%
Spanish or Spanish Creole:	44,441	29%
Speak English less than "very well"	14,285	9%
Other Indo-European languages:	5,160	3%
Speak English less than "very well"	1,627	1%
Korean:	1,786	1%
Speak English less than "very well"	1,001	1%
Chinese	1,659	1%
Speak English less than "very well"	947	1%
Vietnamese:	1,984	1%
Speak English less than "very well"	1,115	1%
Tagalog:	2,371	2%
Speak English less than "very well"	610	0%
Other Asian languages:	1,750	1%
Speak English less than "very well"	760	0%
Arabic:	2,291	1%
Speak English less than "very well"	777	1%
Other and unspecified languages:	731	0%
Speak English less than "very well"	110	0%

Languages spoken by at least 1000 people who speak English "less than very well" are shaded.

Source: U.S. Census Bureau, 2014-2018 5-year American Community Survey (Age 5 and above only), Table C16001 by census tract for the City of Corona Service Area

The Safe Harbor provision states, "if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with the recipient's written translation obligations.

1. The Four Factor Analysis

Factor 1: The number or proportion of LEP persons eligible to be served or likely to be encountered by the program or recipient.

USDOT guidance for this first factor says, "The greater the number or proportion of LEP persons from a particular language group served or encountered in the eligible service population, the more likely language services are needed."

The U.S. Census Bureau compiles data in its decennial Census and American Community Survey (ACS). Among the data collected is information on primary language spoken at home and the ability to speak English. Categories include whether individuals indicate they speak English “very well” or “less than very well.” The LEP population consists of those individuals who speak other languages AND speak English “less than very well.”

CCTS staff reviewed the 2018 U.S. Census Language Survey Report and determined that 63,301 persons in City of Corona (41% of the population) speak a language other than English. Of the 41% population, 21,442 persons (13.8%) indicate having limited English proficiency; that is, they speak English “not very well”. In City of Corona, of those persons with limited English proficiency, 14,285 (9% of the total population) speak Spanish; 1,115 (1% of the total population) speak Vietnamese; 1,001 (1% of the total population) speak Korean; and the remaining 16,401 respondents speak various other languages, each account for less than 1% or 1,000 of the population.

Results from the rider survey of fixed route passengers further refine the LEP population. A survey conducted in spring 2017 showed that 46 percent of passengers identified themselves as Hispanic, 16 percent white, 19 percent African American, 12 percent Asian and 6 percent American Indian and Other. Seventy-eight percent of those surveyed preferred to respond using English language surveys while 22 percent preferred a Spanish-language version; no other translations were requested. In addition, CCTS has no direct evidence of language barriers resulting in the LEP population being underserved. As Table 1 shows, the primary language spoken by the LEP population is Spanish. As such, CCTS has focused its efforts on providing bilingual service (oral) and Spanish translation of written materials as the most cost-effective means of communicating with LEP persons. All key documents are currently provided in Spanish. CCTS has communicated with customer service/Dispatch representatives in preparation for this report, confirming that Spanish is the most common language other than English. It is CCTS’s practice to summon a staff employee should assistance be needed for an individual who speaks another language.

As CCTS is unable perform an on-board rider survey to limit contact during the pandemic, an online survey will be made available as soon as ridership increases. The intent of the survey is to determine if there are any language barriers.

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

The CCTS serves LEP individuals daily via Corona Cruiser and Dial-A-Ride(DAR) service. The use of bus service is a major point of contact with LEP individuals in both of the services (fixed route & DAR). Pass purchase is another point of contact with LEP individuals; CCTS fare media can be purchased online, in-person and on-board bus.

One of the more frequent points of contact is customer service interactions. Customer service/dispatch personnel report daily contact with LEP individuals. The majority of the these daily contacts are with Spanish-speaking individuals. The contractor operating the City’s transit services estimates an average of ten (10) calls per day that are from Spanish-speaking persons. The rider survey indicated a preference for a Spanish version from 22 percent of respondents. CCTS considers a conservative approach would be to follow the rider survey and assume that nearly one-third of riders are Spanish language LEP persons and ride frequently. In addition, while Table 1 indicates Vietnamese and Korean population speaking English

“less than well,” the rider survey had no respondents speaking these languages. However, 71 percent indicated speaking English, 23 percent Spanish, 3 percent Tagalog and the remaining 3 percent other languages not listed on the survey. In addition, since the last Title VI update, staff has not had any request for communication in language other than Spanish.

Factor 3: The nature and importance of the program, activity, or service provided by the program to people’s lives.

While public transit is not an essential service, as are police, fire and medical emergency services, public transit is a key means of achieving mobility for many LEP persons. According to the rider survey, 70 percent of those surveyed responded “No” when asked if an automobile was available for the trip they were making. Prompted further, 16 percent would use a taxi, 15 percent would arrange a ride with someone else, 29 percent would have walked to their destination and 31 percent would have not made the trip if a bus was not available.

As with public transit in general, transportation service provided by CCTS is a key means of mobility for our riders. In describing the purpose of their trip, riders indicated various destinations including, work, shopping, and medical facilities; highlighting the importance of transportation service to the livelihood and quality of life for our riders and their families.

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

The Guide (U.S. DOT) acknowledges that a recipient’s level of resources and the costs imposed may have an impact on the nature of the steps it should take in providing meaningful access for LEP persons. Smaller recipients with more limited budgets are not expected to provide the same level of language services as larger recipients with larger budgets. The Guide goes on to say that “reasonable steps” may cease to be reasonable where the costs imposed exceed the benefits.

CCTS is a small, municipal provider of fixed route (Blue and Red Lines) and Dial-a-Ride service and is committed to assuring that reasonable steps are taken to provide meaningful access to its information and service by LEP persons. As inferred from census data and rider survey, and tempered with practical experience, Spanish-speaking LEP persons is the target audience. As such, CCTS provides the following services:

Oral:

- Bilingual/Spanish
 - In-person interview
 - Community meetings
 - Public hearing
- Bilingual/Spanish vendor staff
 - 57% of administrative staff including dispatching
 - 41% of the drivers

Written – Spanish translation:

- Brochures – schedule, policies, fare structure
- Bus stop kiosks
- Rider alerts
- Website
- Community meeting and public hearing notice

While CCTS does not track expenditures related to providing these services, this effort does consume considerable resources. Although the focus has been on Spanish-speaking LEP persons, CCTS continues to look for no- or low-cost opportunities to expand translated materials while maintaining a balance between cost and benefit. While there are no local or regional libraries that provide translations services, CCTS is looking to tap community-based organizations for this service (e.g., ethnic-based chambers of commerce). Looking ahead, CCTS staff will use future updates to the U.S. Census, annual rider survey and practical experience to assess demographic changes in the community.

2. *Language Assistance Plan*

Per the Title VI of the Civil Rights Act of 1964 (Title VI), the U.S. Department of Transportation (DOT) implementing regulations, and Executive Order 13166 “Improving Access to Services for Persons with Limited English Proficiency (65 FR 50121, Aug. 11, 2000)”, CCTS is federally mandated to develop and implement a Language Assistance Plan by which Limited English Proficiency (LEP) persons can meaningfully access translations of written and oral information. Under the LEP Plan, the Language Assistance Plan will contain the following procedures and measures to effectively communicate with LEP persons.

a. *Procedures to Identify an LEP Person in Need of Language Assistance*

DOT’s *Safe Harbor Provision* stipulates that, if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with the recipient’s written translation obligations. The City has identified the number and proportion of LEP individuals within its service area using data from the 2014-2018 American Community Survey five-year estimates.

In the CCTS service area, the Spanish-speaking and Vietnamese-speaking LEP language groups constitute the 5% or 1,000 persons of population threshold for which written translations of vital documents should be provided to meet the safe harbor standard.

CCTS will continue to perform assessments to determine the language demographics of its service area using one or more of the following methods:

- Analyze updated census data to identify the percentage of LEP persons by census tract.
- Utilize ridership surveys from transit planning or marketing studies to identify the percent of CCTS riders that are LEP persons.

- Examine records to see if requests for language assistance have been received in the past and if so, for what language.
- Survey front-line staff such as drivers, call center representatives, and receptionist on their experience concerning any contacts with LEP persons during the previous year

b. Language Assistance Measures

CCTS will strive to offer the following measures to LEP individuals, that is, persons who speak English “not well” or “not at all”:

- CCTS will print its key information in transit documents in English and the LEP identified language to address the community’s needs.
- If a client asks for language assistance and CCTS determines that the client is an LEP person and that language assistance is necessary to provide meaningful access, reasonable efforts will be made to provide free language assistance.
- CCTS will periodically assess client needs for language assistance based on requests for interpreters and/or translation, as well as the literacy skills of the clients.

In addition, CCTS has also secured funding for translation services to translate documents in other languages identified in Table 1 and coincide with the results of the pending online survey. If the survey shows that there is a language barrier for those communities identified in Table 1, then staff will proceed with securing the services to translate the necessary documents.

c. Outreach Techniques

If the percentage of LEP persons in a particular census tract is significant or if the ridership surveys show a significant percentage of CCTS’s riders are LEP persons, then CCTS will identify the primary language(s) of those individuals potentially impacted and implement the following steps:

- Key transit documents made available in English and in the potentially impacted LEP identified languages within the CCTS service area.
- Access to bilingual staff made available during most service hours for in-person or phone customer service at the administrative offices.

Additionally, when staff prepares a document or schedules a meeting, for which the target audience is expected to include LEP individuals, then documents, meeting notices, flyers, and agendas will be printed and posted in the LEP language identified. These notices will be posted in the following locations:

- Transit Administrative offices
- Transit buses
- Transit website

Such notices may also be posted or announced with local stakeholders, community centers and

effected route major transfer points.

d. Staff Training

The following training shall be provided to CCTS staff and contractor (provider of transportation services) and its staff:

1. Information on CCTS Title VI Policy and LEP responsibilities.
2. Information on the Title VI complaint forms and procedures.
3. Description of language assistance services offer to the public.
4. Documentation of language assistance requests.

e. Monitoring and Updating the LEP Policy and Language Assistance Plan

CCTS will update the LEP as required by U.S. DOT. At a minimum, the plan will be reviewed and updated when data from the 2020 U.S. Census is available, or when it is clear that higher concentrations of LEP individuals are present in the CCTS service area. Updates will include the following:

- The number of documented LEP person contacts encountered annually
- How the needs of LEP persons have been addressed
- Determination of the current LEP population in the service area
- Determination as to whether the need for translation services has changed
- Determine whether local language assistance programs have been effective and sufficient to meet the need
- Determine whether transit system's financial resources are sufficient to fund language assistance resources needed
- Determine whether CCTS fully complies with the goals of this LEP Plan
- Determine whether complaints have been received concerning the agency's failure to meet the needs of LEP individuals

f. Dissemination of the LEP Policy and Language Assistance Plan

A link to CCTS Title VI Plan which includes the LEP Plan will be available on City of Corona's Transportation website, <http://www.CoronaCA.gov/Transit> . Alternatively, any person may request a copy of the plan via telephone, fax, mail, or in person. In addition, if feasible, LEP individuals may request translated copies of the document in an LEP identified language.

Questions or comments regarding the LEP Policy and Language Assistance Plan may be submitted to Public Works Department and/or Sudesh Paul, Transportation Planning Supervisor in the Public Works Department as follows:

City of Corona Transit Service
Public Works Department
400 S. Vicentia Ave.
Corona, CA 92882
Email: Publ.wks@CoronaCA.gov

City of Corona Transit Service
Sudesh Paul, Transp. Planning Supervisor
400 S. Vicentia Ave.
Corona, CA 92882
Email: Sudesh.Paul@CoronaCA.gov

F. RACIAL BREAKDOWN OF NON-ELECTED ADVISORY COUNCILS

CCTS does not select membership to any transit related, nonelected planning boards, advisory councils or committees, or similar bodies. However, CCTS has a high priority goal of providing customer driven community service, and particularly values the views and concerns of the large percentage of minority groups that utilize our system on a daily basis.

G. SUBRECIPIENT MONITORING

There were no sub-recipients for this reporting period that received federal financial assistance from the FTA through City of Corona Transit Service.

H. TITLE VI EQUITY ANALYSIS – CONSTRUCTION IMPACT

Title VI requires a fixed facility (transit centers, operations facility or yard) impact analysis for construction projects to assess any impacts to minority communities. During the reporting period, City of Corona Transit Service had no projects in this category. See Appendix F for statement endorsed by the City of Corona Public Works Director, assuring that no FTA-funded construction projects were undertaken by City of Corona Transit Service from 2018 through 2020.

I. BOARD OF DIRECTORS RESOLUTION OR MEETING MINUTES

The Corona City Council is scheduled to adopt the 2021-2023 Title VI Program at its regularly scheduled meeting on September 2, 2020 (see Meeting Minutes – Appendix G).

IV. PROGRAM SPECIFIC REQUIREMENTS

This section addresses the Requirements for Fixed Route Transit Providers section of FTA C 4702.1B. CCTS operates fewer than 50 peak vehicles, therefore is only mandated to detail the system-wide service standards and policies.

A. SERVICE STANDARDS

Federal Title VI guidelines require all fixed-route transit providers to set service standards and policies for each fixed-route mode operated to guard against discriminatory service design or operations decisions. These standards and policies must address how service is distributed across the transit system, and must ensure that the manner of the distribution affords users access to these assets. Per FTA Circular 4702.1B, the following service standards are required:

- Vehicle Load
- Vehicle Headways
- On-Time Performance
- Service Availability

1. Vehicle Load

Vehicle load is the ratio of passengers on the vehicle to the number of seats on the bus. The average of all loads during the peak operating period should not exceed vehicles' achievable capacities, which are 16 passengers for a 23-foot cut-away bus, 20 passengers for a 25-foot cut-away bus, and 46 passengers for 32-foot buses. Table 2 below lists CCTS fleet detailing its characteristics.

Table 2: Fleet Characteristics

CCTS Fleet Inventory as of June 2017								
Year Built	Manufacturer	Fuel Type	Seats w WC Seats w/o WC	Standing	Length (feet)	Total Vehicles	Fixed Route	Demand Response
2012	ElDorado AeroTech 240	CNG	16/2 20/0	N/A	26	2	*	2
2017	Glaval E-450	CNG	16/2 18/0	N/A	25	11	*	11
2015	ElDorado EZ Rider II	CNG	23/2 29/0	17	32	7	7	0
Totals						20	7	13
*While the cutaway vehicles are primarily used for Demand Response, they are however sometimes used for the fixed route system on an as needed basis as identified in National Transit Database.								

2. Vehicle Headways

Vehicle headway is the measurement of time between buses on a line. Service demand, scheduling constraints, fiscal constraints, and capital resources are all considered when setting headways. Service operates on the two CCTS routes approximately every 70 minutes beginning at approximately 6:30 am until approximately 7:00 pm on weekdays. On Saturday, there is service operating approximately every 60 minutes beginning at 9:00 am and ending at approximately 5:00 pm.

3. On-Time Performance

CCTS defines on-time performance for fixed route bus trips as those trips that depart from a time point location no earlier than the time listed on printed schedules, or arrive at the time point no later than 10 minutes from the scheduled time. CCTS staff monitors on-time performance tracked by CCTS' transit provider for which set at 95% on-time. However, this standard may need to be adjusted and reduced due

to the following factors: match the standard with the regional transit provider, RTA; and current bus schedule not reflective of the current service area demographics.

The increased congestion, in particular during peak hours make it difficult for buses to stay on schedule. In addition, new developments in the past few years and en-route construction projects have added additional delays in the service. CCTS will be performing a Comprehensive Operations Analysis (COA), study of the current operation of the Fixed Route Service. The study will identify strengths as well as opportunities for improvement. The solicitation for the COA was initially released on March 16, 2020; however, the solicitation was canceled due to the impact of COVID-19 on transit system ridership. The solicitation will be released once the situation with COVID-19 improves and ridership returns to normal as the data collected (or lack of data) consequently will not be conducive for an appropriate analysis.

4. Service Availability

It is the goal to provide transit service to residential areas, major medical, shopping, government, employment centers, and activity centers that can support route services. Service availability generally corresponds to the provision of transit service on major traffic corridors in the service area and access to high population centers and trip generators in the areas. The local route system will be designed such that population cluster areas is within one-fourth (1/4) mile of a fixed route or within the service area of a deviated fixed route or general public Dial-A-Ride service. City's next Comprehensive Operations Analysis (COA) scheduled for FY 2020/21 will further identify the population clusters to better define the routes. In addition, CCTS coordinates with Riverside Transit Agency (RTA) and Orange County Transportation to reduce unnecessary duplication of routes and increase distribution of transit services.

B. SERVICE POLICIES

FTA guidance requires fixed route transit providers to develop a policy for the equitable distribution of transit amenities and for vehicle assignment by route. The following service policies are proposed for:

- Transit Amenities
- Vehicle Assignment

1. Transit Amenities

Installation of transit amenities are based on passenger boardings along the routes. Typically for local or commuter routes; amenities should be installed where passenger boardings number 5 or more persons (benches) and 10 or more persons (shelters). An assessment of the stops will be performed based on the outcome of the COA which will help determine the amenities necessary based on boardings at the various stops.

2. Vehicle Assignment

All CCTS buses on the two fixed routes are identical and are accessible to people with disabilities. The 32-foot EZ Rider II compressed natural gas (CNG) buses are low floor buses that eliminates the traditional three-step entrance. They are designed to accommodate peak hour passenger loads – both seated and

standing. The EZ Rider II is outfitted with front and mid-body passenger doors, Cummins engine, Allison transmission, and a kneeling front suspension system that facilitates curb-level passenger boarding.

CCTS' fixed route fleet has an average age of 3 years as of 2020. Five (5) vehicles are used in peak service and two (2) are used as spares. In addition, buses are rotated to allow for vehicle maintenance to occur and to uniformly use the miles of the buses. See Table 2, Fleet Characteristics for complete inventory of CCTS fleet.

APPENDICES

APPENDIX A - TITLE VI COMPLAINT PROCEDURES - English

City of Corona Transit Service (CCTS) Title VI Complaint Filing Procedures

Guidance for Filing an Administrative Complaint under Title VI of the Civil Rights Act of 1964

How to File a Title VI Complaint:

Any person who believes he/she has been discriminated against on the basis of race, color, or national origin with respect to CCTS programs, activities, or services may file a written complaint, or have a representative file a complaint on your behalf, by completing and submitting to CCTS a Title VI Complaint Form. CCTS investigates complaints received no more than 180 days after the alleged incident. CCTS will only process complaint forms that are complete. CCTS will promptly investigate all complaints filed under Title VI, pursuant to this Regulation.

Complaint must include the following information:

1. A complaint must be in writing and signed and dated by the complainant or his/her representative before any action can be taken.
2. A complaint shall state, as fully as possible, the facts and circumstances surrounding the alleged discrimination, including the name and address of the complainant, the date, time, and location of the alleged incident.

A **Complaint Form** can be used to file a Title VI complaint with CCTS and can be obtained at (see Title VI Complaint Form – Appendix D), or by:

- Telephone - by calling the Public Works Dept. at (951) 736-2266 a complaint form can be mailed to requestor.
- Email – by emailing the Public Works Dept. at publwks@CoronaCA.gov a complaint form can be mailed to requestor.
- Online – the Complaint Form can be downloaded from the CCTS webpage at www.CoronaCA.gov/Transit.
- Visiting – Public Works Dept. at 400 S. Vicentia Avenue, Suite 210, Corona, CA 92882.

The following procedures will be followed to investigate Title VI complaints:

- Within 10 business days of receiving the complaint, the Public Works Director/Title VI Administrator will review the complaint to determine CCTS jurisdiction. The complainant will receive an acknowledgement informing her/him whether the complaint will be investigated by CCTS.
- Assistance in completing the complaint form is available upon request by visiting the Corona Public Works Department or by calling (951) 736-2266. Spanish translation is available upon request.
- The investigation will be conducted and completed within 30 business days of the receipt of a completed complaint form. The complainant will be notified in writing of the cause for any unplanned extension to the 30-day rule.
- If more information is needed, CCTS may contact the complainant. The complainant has 10 business days from the date of the letter requesting additional information to submit the requested information to the CCTS Title VI Administrator. If the Title VI Administrator

is not contacted by the complainant or does not receive the requested information within 10 business days, CCTS can administratively close the complaint.

- A complaint can be administratively closed also if the complainant no longer wishes to pursue their complaint. Following the investigation, the Public Works Director/Title VI Administrator will issue one of two letters to the complainant: 1) a closure letter or 2) a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the complaint is closed. A LOF summarizes the allegations and evidence used to make the determination regarding the alleged incident, and explains whether any disciplinary action, additional training of staff, or other action or remedy will occur.
- If the complainant is unsatisfied with the decision, she/he has 30 business days from the date of the closure letter or LOF to appeal to the Assistant City Manager or her/his designee. The complainant will receive written notification of the decision of the appeal and the rationale for the finding within 45 business days from receipt of the appeal request.
- A complaint may also be filed directly with the Federal Transit Administration (FTA) at:

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

The FTA strives to promptly investigate complaints. At the conclusion of the investigation, the FTA will transmit a letter of finding to the complainant and the CCTS. If the investigation determines the CCTS is not in violation of Title VI, the FTA will explain why the CCTS was found in compliance. If the FTA determines that the CCTS is in violation of Title VI, the FTA will document the violation and instruct the CCTS to take action to come into compliance.

In the complaint investigation process, the FTA analyzes the complainant's allegations for possible Title VI deficiencies by the CCTS. If deficiencies are identified they are presented to the CCTS and assistance is offered to correct the inadequacies within a predetermined timeframe.

- No CCTS staff or contract staff shall intimidate, threaten, coerce, or discriminate against any individual for the purpose of interfering with any right or privilege secured by Title VI or because they have made a complaint, testified, assisted, or participated in any manner in an investigation, proceeding, or hearing under Title VI. The identity of complainants shall be kept confidential except to the extent necessary to carry out the purposes of this part, including the conduct of any investigation, hearing, or judicial proceeding arising thereunder. (49 CFR 21.11e)

APPENDIX B - TITLE VI COMPLAINT PROCEDURES - Spanish

Procedimientos Para Presentación de Denuncias bajo la ley de Title VI, Servicio de Transporte de la Ciudad de Corona (CCTS)

Guía para la presentación de una denuncia administrativa bajo la ley de Title VI of the Civil Rights Act of 1964

Cómo presentar una queja de Title VI:

Cualquier persona que cree que él/ella ha sido discriminado(a) basándose en raza, color u origen nacional con respecto a los programas, actividades o servicios del CCTS puede presentar una denuncia por escrito, o tener un representante presentar una denuncia en su nombre, al completar y enviar a CCTS un formulario de denuncia del Title VI. CCTS investiga denuncias recibidas no más tarde de 180 días después del presunto incidente. CCTS sólo procesará las los formularions de denuncias que esten completos. CCTS rápidamente investigará todas las denuncia presentadas bajo la ley de Title VI, conforme con el Reglamento.

La denuncia debe incluir la siguiente información:

1. Una denuncia debe ser por escrito y firmada y fechada por el demandante o su representante antes de que cualquier acción se puede tomar.
2. Una denuncia indicará, completamente y como sea posible, los hechos y circunstancias acerca de la alegada discriminación, incluyendo el nombre y la dirección de el demandante, la fecha, hora y ubicación del presunto incidente.

Un **Formulario de Denuncia** puede utilizarse para presentar una denuncia bajo la ley del Title VI con CCTS y puede obtenerse en (ver Formulario de Denuncia del Title VI – Apéndice D), o por:

- teléfono - llamando al Departamento de obras públicas en (951) 736-2266 un Formulario de Denuncia se le puede enviar por correo al solicitante.
- Correo electrónico – por correo electrónico el Departamento de obras públicas en publwks@CoronaCA.gov un Formulario de Denuncia se le puede enviar por correo al solicitante.
- En línea – el Formulario de Denuncias puede ser descargado de la Página Web de el CCTA en www.CoronaCA.gov/Transit.
- O Visitando el Departamento de obras públicas en 400 S. Vicentia Avenue, Suite 210, Corona, CA 92882.

Se seguirán los siguientes procedimientos para investigar las denuncias bajo la ley del Title VI:

- Dentro de 10 días hábiles después de recibir una denuncia, el Director de Obras Públicas /Administrador de Title VI revisará la denuncia para determinar jurisdicción del CCTS en la denuncia. El demandante recibirá un acuse informándole a él/ella si la denuncia será investigada por el CCTS.

- Ayuda para completar el Formulario de Denuncias está disponible por petición visitando el Departamento de Obras Públicas de Corona o llamando al (951) 736-2266. Traducción en español está disponible por petición.
- La investigación se llevará a cabo y completada dentro de 30 días hábiles después de la recepción de un Formulario de Denuncia completado. El demandante será notificado por escrito de la causa de cualquier extensión no programada a la regla de los 30 días..
- Si se necesita más información, el CCTS puede comunicarse con el demandante. El demandante tiene 10 días hábiles desde la fecha de la carta solicitando información adicional para presentar la información solicitada por el Administrador del Title VI del CCTS. Si el Administrador del Title VI no es contactado por el demandante o no recibe la información solicitada dentro de 10 días hábiles, el CCTS puede cerrar administrativamente la demanda.
- Una demanda puede ser cerrada administrativamente también si el demandante no desea proseguir su demanda. A raíz de la investigación, el Director de obras públicas/Administrador de Title VI emitirá una de dos cartas al demandante: 1) una carta de cierre o 2) Carta de hallazgo (LOF). Una carta de cierre resume las acusaciones y afirma que no hubo una violación de la ley del Title VI y que la denuncia esté cerrada. Una Carta de hallazgo resume los alegatos y pruebas para tomar la determinación sobre el incidente y explica si se producirá cualquier acción disciplinaria, entrenamiento adicional del personal, u otra acción o recurso.
- Si el demandante está insatisfecho con la decisión, él/ella tiene 30 días hábiles desde la fecha de la carta de cierre o Carta de hallazgo para atraer a la Asistente del Administrador de la Ciudad o su designado. El demandante recibirá notificación por escrito de la decisión de la apelación y razón fundamental para decisión dentro de 45 días hábiles desde la recepción de la solicitud de apelación.
- Una queja puede ser presentada también directamente con al Federal Transit Administration (FTA) en:

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

El FTA se esfuerza por investigar con prontitud las demandas. En la conclusión de la investigación, el FTA transmitirá una carta del hallazgo al demandante y el CCTS. Si la investigación determina que el CCTS no está en violación del Title VI, el CCTS le explicará por qué el CCTS se encontró en cumplimiento. Si el FTA determina que el CCTS esta en violación del Title VI, el FTA documentara la violación e instruira a el CCTS para que tome medidas para el cumplimiento de ley del Title VI.

- En el proceso de investigación de la demanda, el FTA analizara los alegatos del demandante para investigar posibles deficiencias del CCTS bajo la ley del Title VI. Si se

identifican deficiencias se presentaran a el CCTS y se le ofrecera ayuda para corregir las deficiencias en un plazo predeterminado.

- No personal del CCTS o de su contratista debera intimidar, amenazar, coaccionar o discriminar a cualquier individuo con el propósito de interferir de cualquier derecho o privilegio asegurado por el Title VI o porque han hecho una denuncia, testificado, asistido o participado de cualquier manera en una investigación, procedimiento o audiencia bajo el Title VI. La identidad de los denunciantes se mantendrá confidencial excepto en la medida necesaria para llevar a cabo los propósitos de esta parte, incluyendo la realización de cualquier investigación, audiencia o procedimiento judicial que se presenta en virtud del mismo. (49 CFR 21.11e)

APPENDIX C - TITLE VI COMPLAINT FORM - English

City of Corona Transit Service Title VI Complaint Form

Section I: Please write legibly			
1. Name:			
2. Address:			
3. Telephone:		3.a. Secondary Phone (Optional):	
4. Email Address:			
5. Accessible Format Requirements?	<input type="checkbox"/> Large Print	<input type="checkbox"/> Audio Tape	
	<input type="checkbox"/> TDD	<input type="checkbox"/> Other	
Section II:			
6. Are you filing this complaint on your own behalf?		YES*	NO
*If you answered "yes" to #6, go to Section III.			
7. If you answered "no" to #6, what is the name of the person for whom you are filing this complaint? Name:			
8. What is your relationship with this individual:			
9. Please explain why you have filed for a third party:			
10. Please confirm that you have obtained permission of the aggrieved party to file on their behalf.		YES	NO
Section III:			
11. I believe the discrimination I experienced was based on (check all that apply):			
<input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin			
12. Date of alleged discrimination: (mm/dd/yyyy)			
13. Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known), as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.			
<div style="border-bottom: 1px solid black; margin-bottom: 10px;"></div> <div style="border-bottom: 1px solid black; margin-bottom: 10px;"></div> <div style="border-bottom: 1px solid black;"></div>			

Section IV:		
14. Have you previously filed a Title VI complaint with City of Corona Transit Service?	YES	NO
Section V:		
15. Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court? <input type="checkbox"/> YES* <input type="checkbox"/> NO If yes, check all that apply: <input type="checkbox"/> Federal Agency _____ <input type="checkbox"/> State Agency _____ <input type="checkbox"/> Federal Court _____ <input type="checkbox"/> Local Agency _____ <input type="checkbox"/> State Court _____		
16. If you answered "yes" to #15, provide information about a contact person at the agency/court where the complaint was filed.		
Name:		
Title:		
Agency:		
Address:		
Telephone:		Email:
Section VI:		
Name of Transit Agency complaint is against:		
Contact Person:		
Telephone:		

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

Signature and date are required below to complete form:

Signature _____ Date _____

Please submit this completed form in person or by mail at the below address:

City of Corona
 Attn: Public Works Director/Title VI Administrator
 400 S. Vicentia Avenue, Suite 210
 Corona CA 92882

This form can also be submitted via Email at: publwks@CoronaCA.gov. Please include the following in the subject line: CCTS Title VI Complaint – Attn: Public Works Director/Title VI Administrator.

APPENDIX D - TITLE VI COMPLAINT FORM - Spanish

Formulario de Queja del Título VI del Servicio de Transporte la Ciudad de Corona

Sección 1: Por favor escriba legible		
1. Nombre:		
2. Dirección:		
3. Número de teléfono :	3.a. Número de teléfono secundario (Opcional):	
4. Dirección de correo electrónico:		
5. ¿Necesita formato accesible? De:	<input type="checkbox"/> Letra Grande	<input type="checkbox"/> Cinta De Audio
	<input type="checkbox"/> Dispositivo de telecomunicaciones para sordos	<input type="checkbox"/> Otro
Sección II:		
6. ¿Es la declaración de esta queja por usted misma(o)?	SI*	NO
* Si su respuesta es "sí" a la pregunta número 6, vaya a la Sección III.		
7. Si su respuesta es "no" a la pregunta número 6, ¿cuál es el nombre de la persona para quien usted está presentando con esta queja? Nombre:		
8. ¿Cuál es su relación con esta persona:		
9. Por favor, explique por qué usted ha presentado la queja por cuenta ajena:		
10. Por favor, confirme que ha obtenido el permiso de la parte agraviada para presentar en su nombre.	SI	NO
Sección III:		
11. Creo que la discriminación que experimenté fue basado en (marque todo lo que corresponda): <input type="checkbox"/> Raza <input type="checkbox"/> Color <input type="checkbox"/> Origen nacional		
12. Fecha de la supuesta discriminación: (día / mes / año)		
13. Explique lo más claramente posible lo que pasó y por qué usted cree que fue discriminado(a). Describa todas las personas que estuvieron involucradas. Incluya el nombre y la información de contacto de la persona (s) que lo(a) discriminó (si se conoce), así como los nombres y la información de contacto de testigos. Si se necesita más espacio, por favor use la parte de atrás de este formulario. _____ _____ _____		

Sección IV:		
14. ¿Ha presentado previamente una queja del Title VI con el Servicio de Transporte de la Ciudad de Corona?	SI	NO
Sección V:		
15. ¿Ha presentado esta queja con alguna otra agencia, estatal, local, o Federal, o con cualquier corte federal o estatal? <input type="checkbox"/> SI* <input type="checkbox"/> NO En caso afirmativo, marque todo lo que corresponda: <input type="checkbox"/> Agencia Federal _____ <input type="checkbox"/> Agencia Estatal _____ <input type="checkbox"/> Corte Federal _____ <input type="checkbox"/> Agencia Local _____ <input type="checkbox"/> Corte Estatal _____		
16. Si usted contestó "sí" a la pregunta número 15, proporcione los datos de contacto de una persona de contacto en la agencia / tribunal donde se presentó la denuncia.		
Nombre:		
Título:		
Agencia:		
Dirección:		
Número de teléfono:	Dirección de correo electrónico:	
Sección VI:		
Nombre de la Agencia de Transporte que la queja es en contra :		
Persona de contacto:		
Número de teléfono:		

Usted puede incluir cualquier material escrito o cualquier otra información que usted piense que es relevante para su queja.

Firma y fecha son necesarias a continuación para completar el formulario:

Firma _____ Fecha _____

Por favor, envíe este formulario completado en persona o por correo a:

City of Corona
 A la atención de: Public Works Director/Title VI Administrator
 400 S. Vicentia Avenue, Suite 210
 Corona CA 92882

A través de correo electrónico a: publwks@CoronaCA.gov. Por favor, incluya lo siguiente en la línea de asunto: CCTS Title VI Complaint – A la atención de: Public Works Director/Title VI

APPENDIX E - LOG OF TITLE VI INVESTIGATIONS, LAWSUITS AND COMPLAINTS

City of Corona Transit Service

Log of Title VI Investigations, Lawsuits, and Complaints

Background

All recipients shall prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, or national origin:

- Active investigations conducted by FTA and entities other than FTA;
- Lawsuits; and
- Complaints naming the recipient.

This list shall include the date that the transit-related Title VI investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by the recipient in response, or final findings related to the investigation, lawsuit, or complaint. This list shall be included in the Title VI Program submitted to FTA every three years.

<u>List of Investigations, Lawsuits and Complaints</u>				
	Date (Month, Day, Year)	Summary (include basis of complaint: race, color, or national origin)	Status	Action(s) Taken
Investigations	NONE	NONE	NONE	NONE
Lawsuits	NONE	NONE	NONE	NONE
Complaints	NONE	NONE	NONE	NONE

APPENDIX F - TITLE VI EQUITY ANALYSIS – NO CONSTRUCTION STATEMENT



City of Corona Transit Service Title VI No Construction Undertaken Statement

August 11, 2020

This statement is affirmation that the City of Corona Transit Service did not undertake construction activities using Federal Transit Administration (FTA) funds from the last reporting period of July 2017 through June 2020 and into the current fiscal year 2021. Nor are there plans to undertake such FTA funded construction projects during the 2021 through 2023 reporting period.

A handwritten signature in blue ink, appearing to read "Tom Koper", written over a horizontal line.

Tom Koper, P.E.
Acting Public Works Director

APPENDIX G - DOCUMENTATION OF COUNCIL ACTIONS RELATED TO TITLE VI

Reserved for City Council approval action

