

2023

MADERA COUNTY Title VI Program



Madera County Public Works Dept./Transit
200 West 4th Street
Madera, CA 93637-8720



MADERA COUNTY

TITLE VI PROGRAM

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Reference: *FTA Circular 4702.1B Title VI Requirements and Guidelines for Federal Transit Administration (FTA) Recipients (October 1, 2012).*

INTRODUCTION

The purpose of this Title VI Program is to establish guidelines to effectively monitor and ensure that Madera County's transit services comply with FTA Title VI requirements.

Title VI states that "no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance." The FTA is required to ensure that federally-supported transit services and related benefits are provided consistent with Title VI. The Title VI Report must be updated every three years.

Madera County will ensure that its programs, policies, and activities comply with Department of Transportation's (DOT) Title VI Regulations (49 CFR Part 21) and with Limited English Proficient (LEP) Persons requirements (70 FR 74087, December 14, 2005). The County is committed to creating and maintaining a public transportation system that is free of all forms of discrimination. The County will take necessary preventive corrective and disciplinary actions to stem behavior that violates this policy or the rights and privileges it is designed to protect. FTA requires recipients to document compliance with DOT Title VI regulations by submitting a Title VI Program to their FTA regional civil rights officer once every three years.

Madera County Title VI Policy Statement

Madera County is committed 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 provided by Title VI of the Civil Rights Act of 1964, as amended.

The County's objectives are to:

- Ensure that the level and quality of transportation service is provided without regard to race, color or national origin.



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- Identify and address, as appropriate, disproportionately high and adverse human health and environmental effects, including social and economic effects of programs and activities on minority populations and low-income populations.
- Promote the full and fair participation of all affected populations in transportation decision making.
- Prevent the denial, reduction or delay in benefits related to programs and activities that benefit minority populations or low-income populations.
- Ensure meaningful access to programs and activities by persons with limited English proficiency (LEP).

TITLE VI REQUIREMENTS

1. **Requirement to Notify Beneficiaries of Protection under Title VI.** In order to comply with 49 CFR, Section 21.9(d), the County shall provide information to the public regarding the County's obligations under DOT's Title VI regulations and apprise members of the public of the protections against discrimination afforded to them by Title VI.

Title VI Notice to the Public

Madera County informs members of the public of its Title VI protection rights by posting a Title VI Notice to the Public and providing bilingual complaint procedures, as shown in Exhibits A and B. The County also provides a bilingual complaint form, as shown in Exhibit C, and posts a Title VI bilingual notice for public viewing at its third-party administrative office.





**EXHIBIT A
NOTICE TO THE PUBLIC - ENGLISH**

**MADERA COUNTY
Madera County
Title VI Notice & Complaint Process**

Madera County is committed 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 provided by Title VI of the Civil Rights Act of 1964. Any person who believes that he or she has been subjected to discrimination under Title VI on the basis of race, color or national origin may file a Title VI complaint with the County.

Complaints may be filed with the County in writing and may be addressed to:

Title VI Compliance Coordinator
Madera County Public Works Department
200 West 4th Street
Madera, CA 93637

A copy of the Title VI Complaint Form (in English or Spanish) and additional information may be obtained from the County's website at "www.maderacounty.com" (under "Departments – Public Works – Transit") or by calling 559-675-7811. The County will provide appropriate assistance to complainants who are limited in their ability to communicate in English.



**EXHIBIT B
NOTICE TO THE PUBLIC - SPANISH**

**CONDADO DE MADERA
Título VI Noticia y Proceso de Quejas**

El Condado de Madera, se compromete a garantizar que ninguna persona sea excluida de participar ó de negar los beneficios de servicios basado por raza, color, linaje u origen nacional, según lo dispuesto en el Título VI de la Ley de Derechos Civiles de 1964. Cualquier persona que cree que él o ella ha sido objeto de discriminación en virtud del Título VI basado por raza, color u origen nacional puede presentar una queja del Título VI con el Condado.

Las quejas pueden ser presentadas en el Condado por escrito y pueden ser dirigidas a:

Coordinadora de Conformidad Título VI
Condado de Madera
200 West 4th Street
Madera, CA 93637

Una copia del Título VI Formulario de Queja (en inglés ó español) y la información adicional se puede obtener desde el sitio web del Condado en “www.maderacounty.com” (en “Departamentos – Departamento de Público - Tránsito”) ó llamando al 559-675-7811. El Condado proveerá asistencia apropiada para los denunciantes que sean limitados en su capacidad de comunicarse en inglés.



- 2. Requirement to Post Notice of Title VI.** The County is required to post a public notice of the protections against discrimination afforded by Title VI.

Madera County Locations Where Title VI Notice is Posted

The following is a list of locations where transit-related bilingual Title VI Public Notices are posted:

- Madera County website: www.maderacounty.com/government/public-works
- Madera County Connection Administrative and Operations Office
- Buses

- 3. Requirement to Develop Title VI Complaint Procedures and Complaint Form.** The County is required to develop procedures for investigating and tracking Title VI complaints filed against the County and to make these procedures for filing a complaint available to the general public.

Madera County Title VI Complaint Procedures

Submission of Complaint: If a customer believes he/she has received discriminatory treatment by Madera County's transit system on the basis of race, color or national origin, the customer will have the right to file a complaint with the Transit Title VI Compliance Coordinator.

The complaint shall be in writing and signed by the complainant(s). Written complaints shall include:

- Date of the alleged discrimination.
- Date when the complainant(s) became aware of the alleged act of discrimination.
- Date that conduct was discontinued or the latest instance of conduct.
- Detailed description of the issues, including names and job titles of those individuals perceived as parties in the complaint.

The complaint can be mailed to:

Madera County Public Works Department
Title VI Compliance Coordinator
200 West 4th Street
Madera, CA 93637

The complaint can be submitted by phone to:

559-675-7811



The complaint may be made in person at the following locations:

Madera County Transit Office
201 W. Almond Avenue
Madera, CA 93637

Madera County Public Works Department
200 West 4th Street
Madera, CA 93637

Investigation of Complaints

Upon receipt of the complaint, the Compliance Coordinator will review it to determine if Madera County has jurisdiction. As appropriate, the complaint will be investigated and a determination made. Formal investigation will be confidential and will include, but is not limited to, details of the specific incident, frequency and dates of occurrences and names of any witnesses. Claimant will be notified in writing of the resolution.

The complainant has ten business days from the date of the letter to send requested information to the Compliance Coordinator. If the Coordinator is not contacted by the complainant or does not receive the additional information within ten business days, Madera County can administratively close the case.

Upon completion of the review, the Transit Administration Manager shall make a recommendation regarding the merit of the complaint, whether remedial actions are available to provide redress, and whether improvements to the County's Title VI process are needed.

A case can be administratively closed if the complainant no longer wishes to pursue their case. Following the investigation, the Title VI Compliance Coordinator will issue one of two letters to the complainant: (1) a closure letter, or (2) a letter of finding. A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. A letter of finding summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member or other action will occur.

- Appeals Process

If the complainant is not satisfied with the resolution, he or she may appeal it to:

Public Works Director
Madera County Public Works Department
200 West 4th Street
Madera, CA 93637



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- Submission of Complaint to the Department of Transportation
The complainant may also file a complaint directly to:

FTA Office of Civil Rights
Title VI Program Coordinator
East Building, 5th Floor – TCR, 1200
New Jersey Avenue, S.E.
Washington, D.C. 20590.

In accordance with FTA Circular 4702.1B, Chapter 9, Complaints, such a complaint must be filed within 180 calendar days after the date of the alleged discrimination.



**EXHIBIT C
MADERA COUNTY
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?
 Large Print Audio Tape TDD 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):
 Race Color 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.

Section IV:

14. Have you previously filed a Title VI complaint with Madera County?
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?

Yes _____ No _____

If yes, check all that apply:

Federal Agency _____ State Agency _____

Federal Court _____ Local Agency _____

State Court _____

16. If you answered "yes" to #15, provide information about 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 form in person or mail this form to the address below:

Title VI Compliance Coordinator
Madera County Public Works Department
200 West 4th Street
Madera, CA 93637



**EXHIBIT D
MADERA COUNTY
TITULO VI FORMULARIO DE QUEJA**

Sección I: (Favor de escribir en forma legible)

1. Nombre: _____
2. Dirección: _____
3. Teléfono: _____ 3.a. Teléfono Secundario (Opcional): _____
4. Correo Electrónico: _____
5. Requisitos en formato accesible?
 Letra Grande Cinta de Audio TDD Otra Forma

Sección II:

7. Está presentando esta queja en su propio nombre? Si* _____ No _____
*Si contesto "si" al #6, baje a la Sección III.
8. Si contesto "no" al #6, cual es el nombre de la persona por cual usted esta representando la queja? Nombre: _____
9. Cual es la relación con este individuo: _____
Favor de explicar porque usted está representando a una tercera persona: _____

10. Favor de confirmar que usted obtuvo permiso de someter una queja con la persona afectada.
Si _____ No _____

Sección III:

11. Yo creo que la discriminación por la que pase fue basada por (Marque la que pertenezca):
 Raza Color Origen Nacional
12. Fecha de la presunta discriminación: (mm/dd/aaaa) _____
13. Explique lo más claro posible lo que paso y porque cree que fue discriminado. Describe todas las personas que estuvieron involucradas. Incluya el nombre y la información de contacto de la persona(s) que lo discrimino (si se conoce), así como los nombres y la información de los testigos en contacto. Si se necesita más espacio, por favor use el reverso de este formulario.



Sección IV:

14. Ha presentado anteriormente una queja del Titulo VI con el Condado de Madera?

Si _____ No _____

Sección V:

15. Ha presentado esta queja con cualquier otra agencia federal, estatal o local, o ante cualquier tribunal federal o estatal?

Si _____ No _____

Si contesto si, marque el que aplique:

[] Agencia Federal _____ [] Agencia Estatal _____

[] Corte Federal _____ [] Agencia Local _____

[] Corte Estatal _____

16. Si contesto "si" al #15, favor de proveer información de una persona cual usted tubo contacto con la agencia/corte donde se sometió la queja.

Nombre: _____

Titulo: _____

Agencia: _____

Dirección: _____

Teléfono: _____ Email: _____

Sección VI:

Nombre de la Agencia de Transito cual se inicio su queja: _____

Persona de Contacto: _____

Teléfono: _____

Usted puede conectar cualquier material escrito u otra información que cree que es relevante para su queja.

Firma y fecha es requerida para someter esta forma:

Firma _____

Fecha _____

Favor de someter esta forma en persona o por correo a la siguiente dirección:

Titulo VI Coordinador de Conformidad
Madera County Public Works Department
200 West 4th Street
Madera, CA 93637



- 4. Requirement to Record and Report Transit-Related Title VI Investigations, Complaints, and Lawsuits.** The County is required to prepare and maintain a list of investigations, complaints, or lawsuits that pertain to allegations of discrimination on the basis of race, color, and/or national origin in transit-related activities and programs and that pertain to the entity submitting the report, not necessarily the larger agency or department of which the entity is a part.

Madera County has not been involved in any transit-related Title VI investigations, complaints or lawsuits. Madera County's Title VI Transit Compliance Coordinator will maintain a list of Title VI investigations, complaints, and lawsuits and include a summary and description of actions taken by the County, as required by the Title VI regulations. The list will include the date that the investigation, lawsuit, or complaint was filed; a summary of the allegations(s); the status of the investigation; lawsuit, or complaint; and actions taken in response, or final findings related to the investigation, lawsuit, or complaint. The list will be included in the County's Title VI submittal to FTA every three years.

- 5. Promoting Inclusive Public Participation and Language Assistance Plan.** The County is required to develop a Public Participation Plan that includes an outreach plan to engage minority and limited English proficient populations, as well as a summary of outreach efforts made since the last Title VI Program submission.



EXHIBIT E MADERA COUNTY AREA TRANSIT PUBLIC PARTICIPATION PLAN

Public Outreach Activities

The Madera County and Madera County Transportation Commission (MCTC) websites post transit schedules and rider information. The County's website provides material in English and Spanish. The County also provides easy access to bilingual (English and Spanish) administrative staff and drivers at the County's third-party contractor administrative offices during operating hours to answer questions during their regular shift schedules for Madera County LEP passengers.

Madera County reaches out to the community directly through meetings with agency and community staff and their clients, as needed. Information regarding the County's transit services is disseminated at these meetings, including schedules and appropriate fliers. Schedules also are made available at a variety of locations throughout the community and on the Madera County Connection transit system.

Public Meetings

Madera County actively participates in the MCTC Social Services Transportation Advisory Council (SSTAC) quarterly meetings that are open to the general public. The SSTAC is composed of diverse public citizens from the community and is open to receiving public testimony prior to initiation of each meeting. MCTC's process elicits feedback from a broad spectrum of residents throughout the County, and all comments are thoroughly reviewed and considered, including Title VI comments.

Madera County collaborates with the MCTC, the Metropolitan Planning Organization (MPO), during its annual Unmet Transit Needs process. The Unmet Transit Needs hearings are accessible to the general public, offer bilingual translation, and are consistent with MCTC's comprehensive Public Participation Plan and process that ensures meaningful access to LEP throughout the Madera County region.

Quarterly MCTC Transit Forum meetings are attended by Madera County staff. Transit operators and social service agencies provide regular updates on pertinent issues, including operations, local and regional planning activities, and transit funding. Staff also informs the committee of key updates and projects, including for Title VI Plan, DBE Plan, Short-Range and Long-Range Plans, Regional Transportation Plan and Sustainability Plan, Transit Asset Management Plan, and Measure T Expenditure Plan.

Madera County staff also participates in the development of the MCTC "Public Participation Plan." A series of meetings is conducted with participants from throughout



the community. Recommendations to maximize community involvement are reflected in this plan and adopted by the MCTC Board.

General Awareness Surveys

Madera County conducts bilingual (English and Spanish) on-board rider and general awareness surveys in conjunction with updates to the Short-Range Transit Plan. These personal one-on-one surveys allow riders to convey any concerns or comments they may have regarding Madera County services.

Bilingual Outreach

Madera County provides Spanish-speaking clients with bilingual information on public transit services. Staff assistance is utilized in outreach programs and offered for programs and public meetings, such as the Madera County Unmet Transit Needs Hearings and transportation workshops.

Telephone Access

Transit staff is available to answer questions in Spanish during normal working hours. The County's MCC system is accessible by telephone at 559-263-8080 weekdays from 7:00 a.m. to 5:00 p.m.

Participation in Community Activities

Madera County engages in community activities that promote transit services, as appropriate. These activities include transportation public workshops and outreach presentations where a broad cross-section of the community can access information on the County's transit systems.

Summary of Outreach Efforts

Madera County's transit staff members regularly participate in recurring and ad hoc outreach.

Outreach locations and activities include:

- Senior Centers – Madera County provides transit information to Madera County Senior Centers to provide regular advertising to their consumers.
- Community Centers – Madera County staff participates in workshops at community centers, as appropriate, and are available to provide bilingual or informational workshops. Madera County Community Centers also provide transit information to their participants.



- MCTC Annual Unmet Transit Needs Process – MCTC is required by statute to conduct a formal hearing process that solicits information about transit needs. This allows MCTC to make a determination as to whether there are unmet transit needs and whether these transit needs can be reasonably met. The hearing processes are conducted only in those parts of the County where State Transportation Development Act, Local Transportation Funds, are allocated only in part to public transportation.

Madera County actively participates in the Unmet Transit Needs Public Hearings conducted by the MCTC Board. This process involves inviting testimony through a wide array of mailing lists and agency contacts, including Madera County's outreach lists, receiving testimony either in-person at the hearing and by mail or by email where a name and local address are provided.

Comments pertaining to Madera County every year are reviewed and responded to appropriately in close coordination with the MCTC Social Services Transportation Advisory Council (SSTAC), a committee composed of diverse representatives from throughout the community.

- Quarterly MCTC Transit Forum meetings provide regularly-scheduled opportunities to network with key transit operators, social service agencies and the general public to discuss and address transit needs and concerns.
- Updates to the Public Transit Human Services Transportation Coordination Plan for Madera County and Public Participation Plan – As part of MCTC's Coordination Plan Update and Public Participation Plan process, Madera County staff actively participates in transit workshops. Members of the public as well as human and social service agency representatives are invited to attend to share transit needs and discuss projects that may address these needs.

6. **Requirement to Provide Meaningful Access to LEP Persons.** The County must have a language assistance plan for providing language assistance to persons with limited English proficiency (LEP). Title VI and its implementing regulations require that FTA recipients take responsible steps to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are LEP.



EXHIBIT F
MADERA COUNTY
Limited English Proficiency (LEP) Plan

Introduction

This Limited English Proficiency (LEP) Plan has been prepared to address Madera County's responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, Federal Transit Administration Circular 4702.1A dated May 13, 2007, which state that no person shall be subjected to discrimination on the basis of race, color, or national origin.

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

Background

Madera County provides transit services that are operated by a third-party contractor. The Madera County Board of Supervisors is the policymaking body for the systems. Madera County transit services consist of commuter fixed-route service, Madera County Connection/MCC, and demand-response MCC Dial-A-Ride, Senior Bus, and Escort Program services. Madera County has developed this LEP Plan to help identify reasonable steps for providing language assistance to persons with limited English proficiency who wish to access services provided by Madera County's transit services. As defined by Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write, or understand English.

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

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

1. The number or proportion of LEP persons in the service area that may be served or are likely to encounter Madera County transit programs, activities, or services.



2. The frequency with which LEP persons come in contact with Madera County transit programs, activities, or services.
3. The nature and importance of programs, activities, or services provided by Madera County to the LEP population.
4. The interpretation services available to Madera County and overall cost to provide LEP assistance.

A summary of the results of Madera County's four-factor analysis is reflected in the following section.

Meaningful Access: Four-Factor Analysis

1. The number or proportion of LEP persons in the service area who may be served or are likely to encounter Madera County programs, activities, or services.

Madera County has an estimated 2021 U.S. Census Bureau population of 159,410. As shown on the table below, the 2021 "U.S. Census, American Community Survey (ACS)" includes a population of 148,287 persons over five years of age. ACS data indicates that 67,993 persons or 46% of persons over five years of age speak a language other than English at home. A total of 80,294 persons or 54% of the total population over five years of age in Madera County speak English only.

The 2021 ACS estimates show that of the 67,993 County population that speak a language other than English, 63,268 persons or 43% are Spanish with 83% speaking English "very well" and 17% "less than very well." A total of 3,003 persons or 2% speak other Indo-European languages with 0.3% speaking English "less than very well." A total of 954 persons or 0.6% speak Asian and Pacific Islander languages with 0.4% speaking English "less than well." And a total of 768 persons speaking other languages comprise 0.5% with 0.4% speaking English "less than well."

2. The frequency with which LEP come in contact with Madera County services.

Madera County staff reviewed the frequency with which Madera County and third-party contract management staff, dispatchers, and bus drivers could have contact with LEP persons. This includes evaluating telephone inquiries, office visits, and personal one-on-one field contacts. To date, Madera County has had no requests for interpreters and no requests for translated program documents. Madera County drivers are in regular contact with LEP persons on Madera County routes, of which the majority is Hispanic; and all Madera County schedules are available in Spanish. Madera County dispatchers have Spanish proficiency or access to Spanish-speaking staff at all times.



MADERA COUNTY				
U.S. Census Bureau, American Community Survey				
Language Spoken at Home by Ability to Speak English (5 Years & Over)				
LANGUAGE SPOKEN AT HOME	Total	Percent	Speak English less than "very well"	Percent
Population 5 years and over				
English only	80,294	54.1		
Language other than English	67,993	45.9		
TOTAL	148,287	100.0		
Spanish	63,268	42.8	25,132	16.9
Other Indo-European languages	3,003	2	426	0.3
Asian and Pacific Islander languages	954	0.6	641	0.4
Other languages	768	0.5	663	0.4
TOTAL	67,993	45.9	26,862	18.0

Source: U.S. Census Bureau, 2021 American Community Survey.



3. The nature and importance of programs, activities, or services provided by Madera County transit services to the LEP population.

Public transportation is a vital lifeline to many County residents providing a link to many important destinations throughout the Madera region. On-board MCC fixed-route ridership survey data from the “Madera County Transportation Commission 2022 Short-Range Transit Plan” indicates that 88% of riders did not have an alternative means to make their trip while 12% do have a car but chose to use public transit.

Further, 55% ride the bus weekly, 18% daily, 16% monthly and 11% were new riders. The primary trip purposes indicated were 29% recreation, 17% shopping, 14% medical; 7% educational, 3% work, 26% other. Men comprised 59% of ridership compared to 41% women.

Of those surveyed, 53% Hispanic; 21% were White; 17% African-American; 7% American Indian; 2% Asian American/Pacific Islander. Forty-two percent were retired, 25% unemployed, while 14% stated they were employed full-time, and 11% part-time, and 8% were students. The majority of riders or 74% indicated an annual income under \$20,000 or 54% with an income of less than \$10,000 and 20% with an income from \$10,000 to \$20,000.

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

Madera County staff has access to a variety of services and resources that can help in outreaching and providing LEP assistance at low or no cost. Community-based resources include:

- Madera County Transportation Commission (MCTC) Public Outreach Meetings for the Regional Transportation Plan, Short-Range Transit Plan, and Public Participation Plan
- MCTC Social Services Transportation Advisory Council (SSTAC)
- MCTC Board Unmet Transit Needs Process
- MCTC Transit Forum Meetings
- MCTC Public Participation Committee
- Madera County Senior and Community Centers
- Madera County Social Services Department
- Translation Services

The above community resources will be used on a regular basis to assist in identifying needs of the County’s LEP population. They will also serve as a means to widely disseminate bilingual transit service information and announcements and to notify the LEP population of planned workshops and outreach efforts.



Based on the four-factor analysis, Madera County will develop its LEP Plan as outlined in the following section.

Identification of LEP Population

Madera County has developed several possible ways to assist in identifying LEP populations within the County, including:

1. Examine records to see if requests for language assistance have been received in the past, either at meetings or over the phone, to determine whether language assistance might be needed at future events or meetings.
2. Have a staff person greet participants as they arrive to Madera County-sponsored events. By informally engaging participants, it is possible to gauge each attendee's ability to speak and understand English.
3. Survey vehicle operators and other front-line staff, including dispatchers, schedulers, and service development planners on their experience concerning any contacts with LEP persons.
4. Network with local human services organizations (such as Social Services and Public Health Departments) to assist in identifying LEP groups and individuals most in need of LEP assistance and to further facilitate dissemination of information about Madera County's transit services.

Language Assistance Measures and Safe Harbor

Madera County employs a number of language assistance options available to LEP persons, including both oral and written language services. The LEP Safe Harbor Threshold provision also must be considered to ensure the identified LEP population needs are addressed.

LEP Safe Harbor

The Safe Harbor Threshold provision stipulates that for each LEP group that meets the LEP language threshold (5% or 1,000 individuals, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered) a subrecipient of FTA funds must provide written translation of vital documents for the non-English users. Further, translation of non-vital documents, if needed, can be provided orally. If there are fewer than 50 persons in a language group that reaches the five percent (5%) trigger, the recipient is not required to translate vital written materials but should provide written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost. These safe harbor provisions apply



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to the translation of written documents only. They do not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable.

Madera County complies with the Safe Harbor Threshold provision, as evidenced by the number of documents translated in Spanish. With respect to Title VI information, the following shall be made available in Spanish:

- Title VI Public Notices
- Title VI Complaint Procedures
- Title VI Complaint Form

In addition, Madera County will conduct marketing that incorporates translated materials that reach LEP persons. Vital bilingual or multilingual documents and key events include the following:

- Notices of free language assistance for persons with LEP
- Notice of Non-Discrimination and Reasonable Accommodation
- Outreach Materials
- System Maps and Bus Schedules
- Route Changes
- Community Meetings
- Public Hearings
- Service Change Announcements
- Safety and Security Announcements

LEP Staff Training

Madera County ensures timely and reasonable language assistance to LEP utilizing several approaches. Customer service staff and other key staff are given instruction on (1) how to respond to an LEP caller request and (2) how to respond to written communication from an LEP person.

Instructions are provided to vehicle operators, supervisors and managers, and others who regularly interact with the public on how to respond to an LEP customer.

Options to Respond to LEP Persons

There are various ways in which Madera County staff can respond to LEP persons, whether in person, by telephone, in writing and/or through on-line methods. They include but are not limited to the following:

- Provide written translation of vital documents for eligible LEP language group(s) including, but not limited to:



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- Consent and complaint forms
- Intake and application forms
- Written notices of rights
- Notice of denials, losses, or decreases in benefits or services
- Notice of person's rights under Title VI
- Provide a bilingual Community Outreach Coordinator at community events and public hearings. Madera County transit has staff or can retain a professional interpreter to provide Spanish interpretation.
- Place statements in notices and publications that interpreter services are available for these meetings.
- Survey bus drivers and other front-line staff, such as dispatchers, schedulers, and service development planners on their experience concerning any contacts with LEP persons during the previous year.
- Post Madera County Title VI Policy and LEP plan on Madera County website, <https://www.maderacounty.com/government/public-works/transit>.
- Access language assistance services from a professional translation service or qualified community volunteers when an interpreter is needed to ensure information is clearly presented, including public comments.
- Provide on-going employee training to promote better understanding of the laws that prohibit discrimination on the basis of national origin and to ensure timely and reasonable language assistance to LEP populations. LEP sensitivity training will be conducted with staff (drivers, dispatchers and management) as part of employee training and orientation and refresher classes to ensure staff work effectively with LEP populations and provide effective language assistance services.
- Post language assistance information on appropriate County and support agencies' websites and key social media websites.

Outreach Techniques

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

Public Outreach Activities

Madera County website posts transit schedules and rider information. The County's website provides material in both English and Spanish. The County also provides easy access to bilingual (English and Spanish) administrative staff and drivers during operating hours to answer questions during their regular shift schedules for those LEP passengers who use the County's bus system.



Madera County reaches out to the community directly through meetings with agency and community staff and their clients, as needed. Information regarding the County's transit services is disseminated at these meetings, including schedules and appropriate fliers. Schedules also are made available at a variety of locations throughout the community and on the County transit systems. Staff utilizes different meeting sizes and formats, utilizes alternative advertising platforms and community interaction.

Public Meetings

Madera County conducts and participates in meetings that are open to the general public and can be scheduled at convenient times and accessible locations. Madera County collaborates with the Madera County Transportation Commission (MCTC), the Metropolitan Planning Organization (MPO), in its Unmet Transit Needs process. The Unmet Transit Needs hearings are accessible to the general public, offer bilingual translation, and are consistent with MCTC's comprehensive Public Participation Plan and process that ensures meaningful access to LEP throughout the Madera County region. The MCTC public hearing is accessible by public transit services.

Madera County transit staff also participates in the development of the MCTC "Public Participation Plan." A series of meetings are conducted with participants from throughout the community. Recommendations to maximize community involvement are reflected in this plan and adopted by the MCTC Board.

Participation in Community Activities

Madera County engages in community activities that promote its transit services. These activities and sites include:

- Madera County Senior Centers
- Madera County Community Centers
- MCTC Annual Unmet Transit Needs Process
- Participation in updates to the Public Transit Human Services Transportation Coordination Plan for Madera County

Assurances

Madera County transit services will ensure that no person, on the grounds of race, color, national origin, as provided by Title VI of the Civil Rights Act of 1964, will be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination. Further, Madera County will notify the public of protections against discrimination afforded them by Title VI Regulations and will take preventive corrective and disciplinary action necessary to stem behavior that violates the rights and privileges the regulations are designed to protect.



Madera County will post information on its website and ensure that it reflects up-to-date information consistent with the requirements of 49 CFR Section 21.9(d).

Monitoring and Updating the LEP Plan

Madera County will update the LEP as required by U.S. DOT. At a minimum, the plan will be reviewed and updated every three years when new data from the U.S. Census is available, or when it is clear that higher concentrations of LEP individuals are present in Madera County transit services area. Updates will include the following:

Documentation of LEP Personal Contacts

- 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 Madera County financial resources are sufficient to fund language assistance resources needed.
- Determine whether Madera County has fully complied with the goals of this LEP Plan.
- Determine whether complaints have been received concerning Madera County transit services' failure to meet the needs of LEP individuals.

Determination of Site or Location of Facilities

Madera County will not determine the location of projects requiring land acquisition and the displacement of persons from their residences and businesses on the basis of race, color, or national origin per Title 49 CFR, Section 21.9(b)(3). In determining the site or location of facilities, Madera County will not make selections with the purpose or effect of excluding persons from, denying them the benefits of, or subject them to discrimination.

Facilities include, but are not limited to, storage facilities, maintenance facilities, operations centers, etc. A Title VI equity analysis will be undertaken before selection of a preferred site and outreach undertaken to persons potentially impacted by the siting of facilities. Compliance with the regulations, the County will also determine if other facilities with similar impacts in the area will result in any cumulative adverse impacts.

If a location is determined to have a disparate impact on the basis of race, color, or national origin, Madera County may only locate the project in the selected location with substantial justification and where there are no alternative locations that would have a less disparate impact. Upon consideration and analysis of alternatives, the least discriminatory analysis will be implemented.



Availability of Title VI Plans and Procedures

Madera County LEP Plan and the Title VI Procedures are included in Madera County's website at www.maderacounty.com. Any person or agency with internet access will be able to access and download the plan from Madera County website. Alternatively, any person or agency may request a copy of the plan via telephone, fax, mail, or in person and shall be provided a copy of the plan at no cost. LEP individuals may request copies of the in translation which Madera County will provide, if feasible.

Questions or comments regarding the LEP Plan may be submitted to Madera County Resources Management Agency, Transit Division, Title VI Compliance Coordinator or Transit Program Manager:

Title VI Compliance Coordinator
Madera County Public Works Department
200 West 4th Street
Madera, CA 93637
Phone: (559) 675-7811
Fax: (559) 675-7631

- 7. Minority Representation on Planning and Advisory Bodies.** The County must describe efforts to encourage participation of minorities on committees, board, councils, or other bodies. County must provide a table of transit-related, non-elected planning boards, advisory councils or committees, or similar bodies, the membership of which is selected by the County, and must indicate the racial breakdown of the membership of such committees or councils.

Madera County has no transit planning and/or advisory committees of non-elected committees.

- 8. Requirement to Develop System-Wide Standards and Policies.** FTA requires all fixed-route transit providers to develop quantitative service standards and policies for their fixed-route service. Individual public transportation providers may set standards that best reflect their local environment.



**EXHIBIT G
MADERA COUNTY
SYSTEM-WIDE SERVICE STANDARDS
MCC FIXED-ROUTE SYSTEM**

Background

FTA requires all fixed-route transit providers of public transportation to develop quantitative standards for the following indicators. Individual public transportation providers may establish their own standards.

Definitions

- Vehicle load for each mode: Generally expressed as the ratio of passengers to the number of seats on a vehicle, relative to the vehicle's maximum load point. (For example, on a 40-seat bus, a vehicle load of 1.3 means all seats are filled and there are approximately 12 standees. Transit providers can specify vehicle loads for peak versus off-peak times, and for different modes of transit.)
- Vehicle headways for each mode: The amount of time between two vehicles traveling in the same direction on a given line or combination of lines.
- On-time performance for each mode: A measure of runs completed as scheduled.
- Service availability for each mode: A general measure of the distribution of routes within an agency's service area.

Vehicle Load Standards

Vehicle load thresholds will be used to measure service effectiveness or to determine remediation. The average of all loads during peak operating period should not exceed 1.25 (25% standees) and 1.0 (0% standees) during off-peak periods on the fixed-route system.

Vehicle Load Standard	Vehicle Load Standard	Standees
Peak Period	1.25	25%
Off-Peak Period	1.0	0%



Vehicle Headway Standards

Vehicle headway is the time interval between vehicles on a route that allows passengers to gauge how long they will have to wait for the next vehicle. Similar to vehicle load, vehicle headway varies by mode and time of day. Vehicle headway will be determined by ridership and available resources to operate service.

Scheduling involves the consideration of a number of factors, including ridership, productivity, transit and pedestrian-friendly streets, density of transit-dependent population and activities, location of key origins and destinations, relationship to the Regional Transportation Plan, relationship to major transportation developments, land use connectivity, and transportation demand management.

On-Time Performance Standards

A vehicle is considered on time if it departs a scheduled timepoint no more than one minute early and no more than eight minutes late. Madera County's on-time performance objective is 90% or greater. Madera County monitors on-time performance and responds to address performance that falls below these standards. Considerations include operational issues such as increased/decreased traffic congestion resulting in the need for additional/less travel time; road work; flag stops; driver characteristics; clock synchronization; etc.

Service Availability Standards

This standard is a general measure of the distribution of routes within an agency's service area. Madera County's service availability standard will strive to offer route availability within a reasonable walking distance (i.e., one-half mile) of a bus stop for 70% of residents in the service area. Like vehicle headways, the ability to provide increased service levels will be determined by ridership and available resources to operate service. Given the rural nature of the County's transit service area, criteria such as population density, location of employment centers, seasonal activity generators, development patterns, etc., will be considered.



**EXHIBIT H
MADERA COUNTY
SYSTEM-WIDE SERVICE POLICIES
MCC FIXED-ROUTE SYSTEM**

Background

FTA requires that all providers of fixed-route public transportation develop qualitative policies for the following procedures:

- Vehicle Assignment
- Transit Amenities

Policies

Vehicle Assignment Policy

Buses have the same level of amenities (i.e., air conditioning, wheelchair lifts) available to riders. Buses are not assigned to specific communities in the MCC service area based on vehicle age. The capacity of vehicles will be matched to the operating characteristics of the route. MCC will endeavor to deploy vehicle(s) assigned to each of the MCC fixed-routes such that the average age of the fleet serving each route does not exceed over seven years beyond the FTA useful life standard of the assigned vehicle type.

Transit Amenities Policy

Transit amenities are distributed on a system-wide basis. Transit amenities include shelters, benches, and signage. Installation of transit amenities along bus routes will be determined by factors such as ridership, boardings, individual requests, staff recommendations, and proximity to key origins and destinations. Consideration will be given to ensure amenities are being distributed throughout the transit system in an equitable manner; i.e., considering disparate impacts on the basis of race, color, or national origin, and taking corrective actions to remedy existing disparities to the maximum extent possible.