



# TITLE VI PROGRAM UPDATE

## VENTURA COUNTY TRANSPORTATION COMMISSION

June 1, 2024 – May 31, 2027



# TABLE OF CONTENTS

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INTRODUCTION _____	3
VCTC'S VISION STATEMENT _____	3
VCTC'S MISSION STATEMENT _____	3
TITLE VI OF THE CIVIL RIGHTS ACT OF 1964 _____	3
AGENCY OVERVIEW _____	4
GENERAL REQUIREMENTS _____	5
CIVIL RIGHTS NOTICE TO THE PUBLIC _____	5
COMPLAINT PROCEDURES AND COMPLAINT FORMS _____	6
TITLE VI INVESTIGATIONS, COMPLAINTS, AND LAWSUITS _____	14
PUBLIC PARTICIPATION PLAN _____	14
LANGUAGE ASSISTANCE PLAN _____	18
MEMBERSHIP OF NON-ELECTED COMMITTEES & COUNCILS _____	32
MONITORING SUBRECIPIENTS AND CONTRACTORS _____	33
FIXED FACILITY IMPACT ANALYSIS _____	34
GOVERNING BODY APPROVAL OF TITLE VI PLAN _____	34
PROGRAM SPECIFIC REQUIREMENTS _____	35
SYSTEM-WIDE SERVICE STANDARDS _____	35
SYSTEM-WIDE SERVICE POLICIES _____	37
ATTACHMENT A _____	38



# INTRODUCTION

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This VCTC Title VI Program Report provides policies, procedures, and data analysis to comply with guidelines issued by the Federal Transit Administration of the US Department of Transportation to implement Title VI of the 1964 Civil Rights Act regarding transit services and related benefits. The purpose of Title VI is to “assure 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 subjected to discrimination under any program or activity receiving Federal financial assistance.”

Since 1972, the FTA has required applicants for and recipients of Federal assistance to provide assessments of compliance as part of the grant approval process. The FTA has the responsibility to ensure that federally supported transit services and related benefits are distributed in a manner consistent with Title VI including as related to Environmental Justice and access for individuals who have Limited English Proficiency (LEP). This update conforms to the FTA's Title VI Circular 4702.1B, effective October 2012.

As a federal grant recipient, VCTC is required to maintain and provide to FTA information on its compliance with the Title VI regulations. VCTC is required to perform a self-assessment every three years and to document that service and benefits are provided in a non-discriminatory manner. This Program Update will be for the period of **June 1, 2024, through May 31, 2027**.

Any questions regarding this Title VI Program Update can be directed to the Claire Grasty, Director of Transit at [cgrasty@goventura.org](mailto:cgrasty@goventura.org) or at (805) 642-1591.

## VCTC'S VISION STATEMENT

To Keep Ventura County moving.

## VCTC'S MISSION STATEMENT

To create a more connected, resilient, equitable and user-friendly transportation system for Ventura County.

## TITLE VI OF THE CIVIL RIGHTS ACT OF 1964

Title VI of the Civil Rights Act of 1964 protects people from discrimination based on race, color, and national origin in programs and activities receiving federal financial assistance. The Federal Transit Administration works to ensure nondiscriminatory transportation in support of its mission to

enhance the social and economic quality of life for all Americans. The FTA Office of Civil Rights is responsible for monitoring FTA recipients' Title VI programs and ensuring their compliance with Title VI requirements.

## **AGENCY OVERVIEW**

The Ventura County Transportation Commission (VCTC) is the regional transportation planning agency responsible for transportation planning efforts in Ventura County. Access to convenient, safe, and affordable multimodal transportation options is a crucial element in maintaining the quality of life for residents, visitors, and the public. The transportation network allows people to access opportunities related to employment, education, shopping, medical, social and recreation. Ensuring the ongoing efficient and effective operation of this network is central to VCTC's mission to provide accessibility and equity to all.

# GENERAL REQUIREMENTS

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This section addresses the General Requirements as described under Chapter III of FTA Circular 4702.1B, dated October 1, 2012. The information is required under U.S. Department of Transportation (DOT) regulations of all Federal Transit Administration (FTA) grantees on a triennial basis.

## CIVIL RIGHTS NOTICE TO THE PUBLIC

The Ventura County Transportation Commission (VCTC) is committed to ensuring that the public is aware of the rights and protections afforded to them under Title VI. In accordance with Title 49 CFR Section 21.9(d) and guidance provided in FTA Circular 4702.1B, VCTC's Civil Rights Policy includes:

- A statement that VCTC operates programs without regard to race, color, or national origin;
- A description of procedures that the public should follow to request additional information regarding VCTC's Title VI obligations;
- A description of the procedures that the public needs to follow in order to file a Title VI discrimination complaint.

## LIST OF LOCATIONS WHERE TITLE VI PUBLIC NOTICE IS POSTED

The Ventura County Transportation Commission (VCTC) Title VI notice to the public is currently posted by the VCTC Transit Operations staff at the following locations:

- VCTC, Main Office, 751 E. Daily Dr. #420, Camarillo, CA 93010
- VCTC Intercity, schedule brochures
- Valley Express Bus & Dial-A-Ride, schedule brochures
- On-board all VCTC and Valley Express revenue service fleet vehicles

VCTC's Title VI Policy can be found on VCTC's website at: <https://www.goventura.org/vctc-transit/title-vi-2/>

For additional information on VCTC's civil rights program and procedures to file a complaint, call 1-800-438-1112, visit <https://www.goventura.org/vctc-transit/title-vi-2/> or write to:

Attn: Director of Transit  
Ventura County Transportation Commission

751 E. Daily Dr., Suite 420  
Camarillo, CA 93010

In addition to the Title VI Complaint process at VCTC, a complainant may file a Title VI complaint with the Federal Transit Administration (FTA), Office of Civil Rights, 1200 New Jersey Avenue, SE Washington, DC 20590.

## **COMPLAINT PROCEDURES AND COMPLAINT FORMS**

As part of VCTC's commitment to ensuring that no person is discriminated against based on race, color, or national origin. To ensure compliance with 49 CFR Section 21.9 (b), VCTC has developed The Civil Rights Policy which includes procedures for investigation and tracking Title VI complaints. **VCTC** policy is to investigate complaints that are filed in writing within 180 days from the date of the alleged discrimination in which the complainant alleges discrimination on the basis of race, color, or national origin. Each complaint alleging discrimination based on race, color, or national origin is categorized as a Title VI complaint and investigated according to VCTC's Title VI Complaint Procedure. Translated versions of the procedure and complaint form can be accessed by clicking the tabs located on the Title VI Program webpage.

## **TITLE VI POLICY**

The Ventura County Transportation Commission (VCTC) 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 protected by Title VI of the Civil Rights Act of 1964, as amended.

No person or group of persons will be discriminated against with regard to fares, routing, scheduling, or quality of transportation service that VCTC furnishes, on the basis of race, color, or national origin. Frequency of service, age and quality of vehicles assigned to routes, and location of routes will not be determined based on race, color or national origin.

## **HOW TO FILE A COMPLAINT**

Any person who believes that they have, individually, or as a member of any specific class of persons, been subjected to discrimination based on their race, color, or national origin may file a Title VI complaint with VCTC. The complaint must be filed within 180 days of the date of the alleged discrimination. Written complaints may be sent to:

Ventura County Transportation Commission  
Attn: Director of Transit

751 E. Daily Dr., Suite 420  
Camarillo, CA 93010

Or to [ridercomments@goventura.org](mailto:ridercomments@goventura.org)

The "Title VI Complaint Form" is available online at <https://www.goventura.org/vctc-transit/riding-vctc/#title-vi> and should be used to detail the complaint, but is not mandatory. Complaint forms may also be obtained by calling 1- 800-438-1112. In addition to the Title VI complaint process at VCTC, a complainant may file a Title VI complaint with the Federal Transit Administration, Office of Civil Rights, 1200 New Jersey Avenue, SE, Washington, D.C. 20590.

If a complaint is made in a language other than English, VCTC staff will translate the complaint and if staff is unable to perform the translation, VCTC staff have the ability to receive translations through a contracted service, and any response, including requests for additional information and any disposition will be made in both English and the language in which the complaint was made.

## **HOW COMPLAINTS ARE PROCESSED BY VCTC**

All complaints alleging discrimination based on race, color or national origin in a transit service or benefit provided by VCTC and sub-recipients will be recorded by the VCTC Director of Transit by updating the "List of Active Investigations, Lawsuits or Complaints". This list shall include the date of the 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 or subrecipient in response to the investigation, lawsuit, or complaint. The list shall be made available to FTA upon request and with every VCTC Title VI Program update.

If additional information is needed for assessment or investigation of the complaint, VCTC staff will contact the complainant in writing within fifteen (15) working days of receiving the complaint. Failure of the complainant to provide the requested information by the requested date may result in the administrative closure of the complaint.

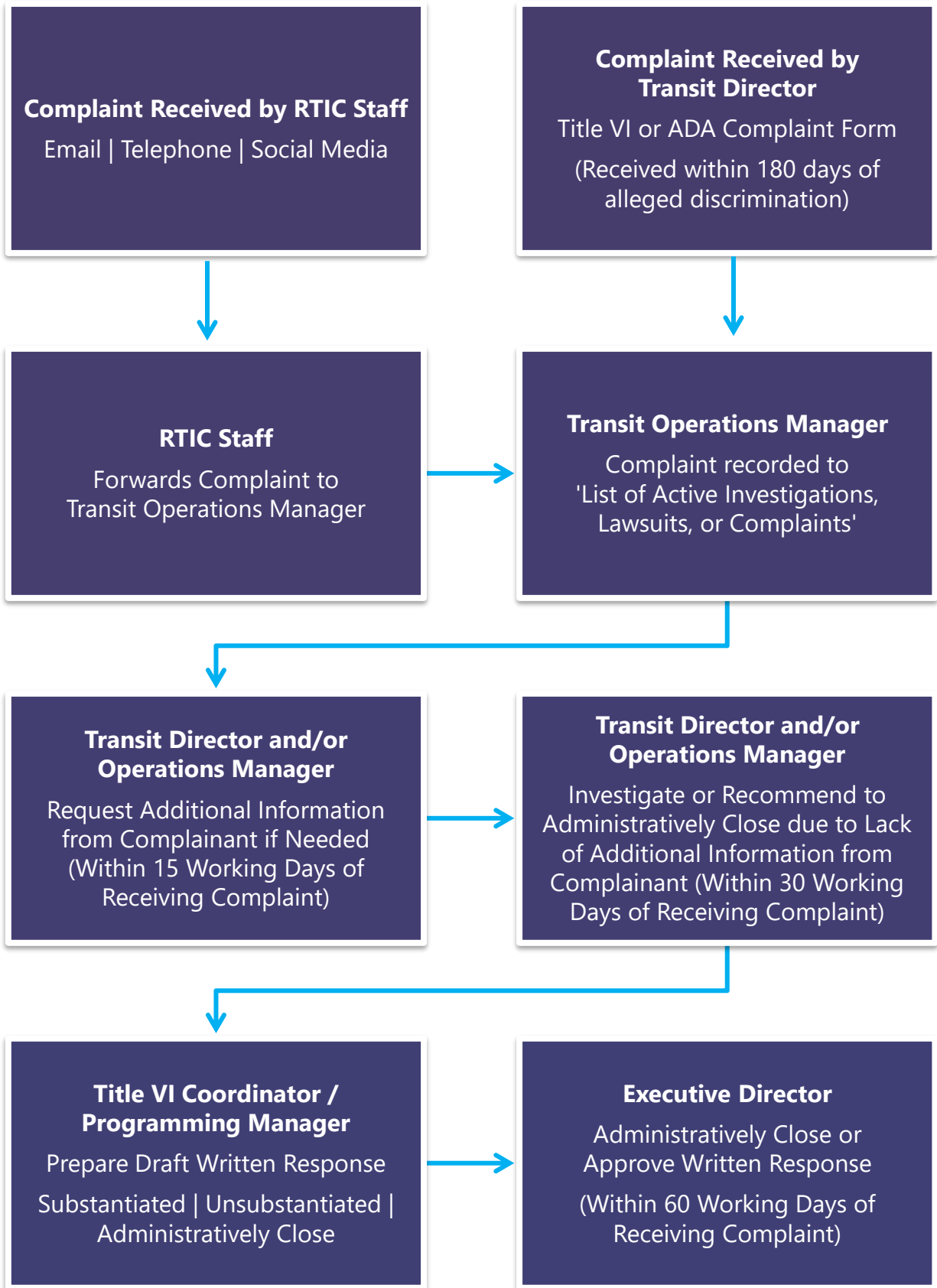
VCTC staff will investigate the complaint and prepare a draft written response. If appropriate, VCTC staff may administratively close the complaint.

VCTC staff will investigate a formal Title VI complaint within thirty (30) working days of receiving the complaint. Based upon all the information received, VCTC staff will prepare a draft written response subject to review by the VCTC Executive Director.

The VCTC Executive Director will determine if the complaint may be administratively closed after the draft is written, or if a final written response is needed. If a final written response is needed, VCTC will send the response to the complainant and advise the complainant of his/her right to file a complaint externally. The complainant also will be notified of the action in writing and advised of their right to appeal the response to federal and state authorities as appropriate.

VCTC will use its best efforts to respond to a Title VI complaint within sixty (60) working days of its receipt. Please see "**Attachment A**" for draft letters.

The flowchart below is provided as an overview and visual representation of the internal process for resolving customer complaints. Most complaints are captured by VCTC's Regional Transit Information Center (RTIC) representatives who provide instructions to the public on how to reach schedules, plan a trip, properly board and disembark from a transit vehicle, or purchase a bus pass. RTIC staff also inform riders about their rights and responsibilities and special equipment available.



# TITLE VI COMPLAINT FORMS

## Ventura County Transportation Commission Title VI Complaint Form

Title VI of the 1964 Civil Rights Act requires 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 benefit of, or be subjected to discrimination under any program or activity receiving federal financial assistance."

The requested information will assist us in processing your complaint. Please let us know if you require any assistance in completing this form.

Complete and return this form to:

VCTC Transit Director  
751 E. Daily Drive #420  
Camarillo, CA 93010

1. Complainants Name: \_\_\_\_\_
2. Address: \_\_\_\_\_
3. City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_
4. Telephone Number (home): \_\_\_\_\_ (business): \_\_\_\_\_
5. Person discriminated against (if someone other than the complainant):  
Name: \_\_\_\_\_  
Address: \_\_\_\_\_  
City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_  
Telephone Number (home) \_\_\_\_\_ (business): \_\_\_\_\_
6. Which of the following best describes the reason you believe the discrimination took place? Was it because of your:  
a. Race / Color:   
b. National Origin:
7. What date did the alleged discrimination take place? \_\_\_\_\_
8. In your own words, describe the alleged discrimination. Explain what happened and whom you believe was responsible. Please use the back of this form if additional space is required.
9. 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 each box that applies:  
 Federal agency;  Federal court;  State agency;  State court;  Local agency



## Ventura County Transportation Commission

### Título VI Forma de Queja

El Título VI de los derechos civiles de 1964 exige que "Ninguna persona en los Estados Unidos, por motivos de raza, color o origen nacional, ser excluido de la participación en, ser negado los beneficios de, o ser objeto de discriminación bajo cualquier programa o actividad que reciba asistencia financiera federal."

La información solicitada es necesaria para asistimos en el procesamiento de su queja. Por favor avísenos si usted requiere ayuda en completar esta forma.

Complete y devuelva esta forma a:

VCTC Transit Director  
751 E. Daily Drive #420  
Camarillo, CA 93010

1. Nombre del reclamante: \_\_\_\_\_

2. Dirección: \_\_\_\_\_

3. Ciudad: \_\_\_\_\_ Estado: \_\_\_\_\_ Código Postal: \_\_\_\_\_

4. Número de teléfono (casa): \_\_\_\_\_ (negocio): \_\_\_\_\_

5. Persona de discriminación (si alguien que no sea el reclamante):

Nombre: \_\_\_\_\_

Dirección: \_\_\_\_\_

Ciudad: \_\_\_\_\_ Estado: \_\_\_\_\_ Código Postal: \_\_\_\_\_

Número de teléfono (casa): \_\_\_\_\_ (negocio): \_\_\_\_\_

6. ¿Cuál de las siguientes opciones describe mejor la razón usted cree que la discriminación ocurrió? ¿Fue debido a su:

a. Raza / Color:

b. Origen Nacional:

7. ¿Qué fecha ocurrió la supuesta discriminación? \_\_\_\_\_

8. En sus propias palabras, describa la supuesta discriminación. Explique lo que ocurrió y a quien usted cree que fue responsable. Por favor use otra página (o atrás de la forma) si se necesita espacio.

9. ¿Ha presentado esta queja con cualquier otra agencia gubernamental, o con algún tribunal federal o estatal? Sí:  No:

Si la respuesta es sí, marque cada caja que se aplica:

agencia federal;  tribunal federal;  organismo estatal;  tribunal estatal;  agencia local

## Ventura County Transportation Commission

10. Por favor proporcione la información sobre una persona de contacto en la agencia o tribunal donde la queja fue presentada.

Nombre: \_\_\_\_\_

Dirección: \_\_\_\_\_

Ciudad: \_\_\_\_\_

Estado: \_\_\_\_\_

Código Postal: \_\_\_\_\_

Número de teléfono: \_\_\_\_\_

11. Por favor firme abajo. Usted puede incluir cualquier material escrito o otra información que usted cree es pertinente a su queja.

\_\_\_\_\_

Firma del Reclamante

\_\_\_\_\_

Fecha

## **TITLE VI INVESTIGATIONS, COMPLAINTS, AND LAWSUITS**

To comply with 49 CRF Section 21.9(b), VCTC maintains a list of all active complaints, investigations, and lawsuits naming VCTC, based on race, color, and/or national origin. This list includes the date of the complaint, investigation of or lawsuit; a summary of the allegations; and the status of the complaint, investigation, or lawsuit; and the actions taken in response to the complaints, investigations, and lawsuits. From May 31, 2021 to April 30, 2024, VCTC has not had any Title VI discrimination complaints filed.

## **PUBLIC PARTICIPATION PLAN**

Pursuant to FTA Title VI regulations and FTA guidance 4702.1B, VCTC's Public Participation Plan has been updated and assembled to capture the methods, innovations, and measurements of the agency's commitment to exceed the prescribed requirements of the FTA Circular 4702.1B, citing VCTC's responsibilities to Limited English Proficient (LEP) persons that are traditionally underserved, such as people with disabilities, low-income populations, minority communities, and other historically disadvantaged groups.

VCTC serves the county of Ventura consistently and in the most cost-efficient and appropriate manner. Through conversation and collaboration with riders, prospective riders, and the larger community, VCTC assesses the quality of its service, measures potential impacts to the community from VCTC's transportation-related initiatives or proposed initiatives and ensures that it is providing a valuable and accessible service.

## **PUBLIC PARTICIPATION PROCESS**

### **APPROACH TO PUBLIC PARTICIPATION**

The public participation process should be considered at the earliest stages of any transit project that may impact the community, transit riders, and potential transit riders. The public participation process and extent of public participation varies for each project. The following sections outline tools and strategies to ensure that public input is invited and all foreseeable impacts to the community are considered.

At the beginning of a project, staff will identify appropriate and effective strategies and develop an approach. For contracted projects, the Request for Proposal (RFP) requirements and criteria for scoring proposals will include the development of that project's Public Participation Process.

## **OUTREACH REQUIREMENTS AND ACTIVITIES**

The following activities are intended to serve as guidelines for minimum levels of outreach to ensure that all residents, transit riders, and potential transit riders have equal access and opportunity to participate in transit planning and decision-making activities. These also provide strategies for soliciting input and engaging various communities, including racial minorities and LEP individuals.

### Minimum Outreach Requirements

1. Notices for public outreach events may include posters, email blasts to the public and stakeholders, media releases to local papers, social media postings, and/or radio announcements if funding allows.
2. Notices are posted one week prior to the event.
3. Notices are posted at the VCTC offices, on buses, and major transfer points or stations along affected routes.
4. Notices are posted on [www.goventura.org](http://www.goventura.org) and may include other online tools such as mobile apps, GTFS Realtime Alerts and other available real-time information public notification systems.
5. Comments are accepted in person at public events, by mail, email, social media, and phone.

### Outreach Methods to Engage Minority and Limited English Proficient Populations

1. VCTC will produce its transit schedules in English and Spanish.
2. VCTC will develop and post notices in English and Spanish.
3. VCTC will cultivate relationships with community groups and agencies that serve LEP populations.
4. VCTC will distribute event information to community groups and agencies that work with LEP populations.
5. VCTC will employ bilingual staff who can translate for LEP individuals that speak Spanish.
6. VCTC will ensure that non-English language interpretation is available at public transit meetings or workshop.
7. VCTC will attend existing community meetings and activities to invite participation from LEP populations who may not attend VCTC hosted public meetings.

VCTC annually holds transit listening sessions as part of its Unmet Transit Needs process in the evenings in the Heritage Valley and in the cities of Moorpark, Camarillo, and Thousand Oaks to  
pg. 15

receive input from these communities, in addition to meetings held at the VCTC meeting site in Camarillo. The Heritage Valley and the City of Oxnard are the two areas in the county with substantial minority and Spanish speaking populations. Bilingual staff participates at all transit related public meetings, and an announcement is made in Spanish as well as English regarding the availability of staff to translate or interpret for the LEP attendees.

When VCTC considers fare changes, it takes several actions including:

- Issuing press releases to all media outlets in English and Spanish
- Advertising in English and Spanish publications
- Surveying riders in English and Spanish
- Making staff available to community groups and schools

Transit staff works with the community groups and Neighborhood Community Councils who represent and coordinate the low-income communities, including CAUSE, and more traditional organizations such as the County Human Services Authority and the Area Agency on Aging.

## **SUMMARY OF OUTREACH EFFORTS**

### **RECURRING OUTREACH EFFORTS**

***Unmet Transit Needs*** – VCTC is required by State statute to conduct a Public Hearing to solicit information on transit needs each year. The annual Unmet Transit Needs survey and comment period is held from mid-December to mid-February, with community meetings generally held in January and the public hearing held on the first Friday in February. VCTC takes comments year-round and greatly encourages feedback from the public to determine if additional areas need to be served by public transit in cities with populations less of less than 100,000.

### **RECENT PROJECT-RELATED OUTREACH EFFORTS**

**College Ride Free** – Purpose of this outreach is to bring awareness to free public transit bus rides for college students in Ventura County as part of the Low Carbon Transit Operations Program (LCTOP).

**Youth Ride Free** – Purpose of this outreach is to bring awareness to free rides for youth 18 and under and those over 18 enrolled in high school to ride any public transit bus in Ventura County as part of the Low Carbon Transit Operations Program (LCTOP) program.

Free Fare Days – Purpose of this outreach is to bring awareness to free rides for anyone to ride any public transit bus service within Ventura County on select days as part of the Low Carbon Transit Operations Program (LCTOP) program.

#### Summary Overview of Major Outreach Efforts Made Since 2021

##### **2021**

Comprehensive Transportation Plan (CTP) –Between Summer 2021 and Winter 2022, VCTC staff solicited feedback from hundreds of community members for their thoughts on the future of transportation between Summer 2021 and Winter 2022. The CTP was guided by input received from the community and project stakeholders. There were two online surveys that were made available in English and Spanish during the project. Additionally, members of the project also visited community events to connect with community members to get feedback.

Coordinated Public Transit-Human Services Transportation Plan (2022 Update) – The project team conducted outreach between July 2021 and May 2022 using a variety of engagement methods including interviews, affinity group discussions, and surveys to address potential barriers to public transportation.

##### **2022**

Ventura County Fair – The purpose of this outreach activity was to showcase VCTC's services and engage with potential customers face-to-face. By having presence at events like this, VCTC increased brand awareness through brochures, digital advertisements, and organic social media posts.

##### **2023**

Transit Integration and Efficiency Study (TIES) – Conducted an online survey to solicit input from the general public about the potential for the TIES study to affect their use of or interest in transit. The survey was targeted to all residents, students, or workers in Ventura County, whether they used transit or not.

VCTC Intercity and Valley Express Rider Survey – VCTC conducted on-board rider surveys to compile passenger information regarding fare payment methods, travel patterns, and customer satisfaction as well as demographic information in support of federal Title VI requirements.

##### **2024** | Plans and Studies in Progress

Short Range Transit Plan (SRTP) – Conducted an online survey to solicit feedback to better help VCTC and local bus operators understand the community's priorities and preferences for public transportation services across the County.

## **LANGUAGE ASSISTANCE PLAN**

This Language Assistance Plan was developed during the process of preparing the VCTC Title VI Program to ensure that VCTC services are accessible to Limited English Proficient (LEP) individuals. LEP is defined as having a limited ability to read, write, speak, or understand English. In compliance with regulations from the U.S. Department of Transportation, and to avoid discrimination against LEP persons on the grounds of national origin, VCTC will take steps to ensure that all persons have meaningful access to its programs, services, and information.

The plan has been prepared in accordance with:

- Title VI of the Civil Rights Act of 1964, Federal Transit Administration Circular 4702.1B dated October 1, 2012, which prohibits discrimination against individuals based on race, color, and national origin and includes meaningful access to LEP customers.
- Executive Order 13166, titled "Improving Access to Services for Persons with Limited English Proficiency (August 2000)" , 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 VCTC as both a recipient of Federal transit funds and as a programming agency responsible for distributing Federal transit funds to the different public and private transportation providers in this region.

VCTC's Title VI Program was prepared in May 2024 in accordance with FTA Circular 4702.1B, Title VI Requirements and Guidelines for Federal Transit Administration Recipients, October 1, 2012.

VCTC's Title VI Program Administrator is:

Peter De Haan, Director of Programming  
Ventura County Transportation Commission  
751 E. Daily Drive #420 Camarillo, CA 93010  
805.642.1591  
Email: [Pdehaan@goventura.org](mailto:Pdehaan@goventura.org)

More information about Ventura County Transportation Commission's Title VI Program is available at <https://www.goventura.org/vctc-transit/riding-vctc/#title-vi>.

## OVERVIEW OF VCTC

VCTC has evolved to administer and act as the:

- **Regional Transportation Planning Agency (RTPA)** – VCTC is responsible for multi-modal transportation planning, programming, and fund allocation, as required by the state statutes. This includes the annual allocation of Transportation Development Act funds, as well as all federal and local funds for highway, transit, rail, bicycle and other transportation projects.
- **Congestion Management Agency (CMA)** – The Cities and County have designated VCTC as the CMA for Ventura County. In this capacity, VCTC is responsible for the development and implementation of the countywide Congestion Management System (CMS) required in all urban counties. In the past, the State of California and the federal government required the CMA to prepare a Congestion Management Program (CMP), which provides local agencies and private developers the procedures and tools necessary to manage and decrease traffic congestion in the County. Although this is no longer a state-level requirement, VCTC continues to update and monitor its CMP.
- **Consolidated Transportation Services Agency (CTSA)** – VCTC is the state mandated facilitator charged with the development and implementation of regional coordination of transit and paratransit services and improvement of social service transportation to seniors, persons with disabilities, the young and the low-income disadvantaged.
- **Airport Land Use Commission (ALUC)** – In this capacity, VCTC is responsible under state law to protect public health, safety, and welfare by ensuring that vacant lands in the vicinity of airports are planned and zoned for uses compatible with airport operations.
- **Ventura County Service Authority for Freeway Emergencies (SAFE)** – As the SAFE, VCTC is responsible for the installation, operation, and administration of the system of roadside call boxes in Ventura County that is financed by a \$1.00 per year fee on all motor vehicles registered within the county.
- **County Transportation Commission (CTC)** – As the CTC, VCTC leverages state and federal transportation dollars and provides assistance during project implementation. VCTC's responsibilities include preparing the State Transportation Improvement Program (STIP) for submittal to the State, participation in the AB1246 Committee, performing short-range capital and service planning, and preparing long-range expenditure plans for transportation programs in the county.
- **County Transportation Authority (CTA)** – VCTC was designated the CTA per California Public Utilities Code 130050.1. In the role as the CTA, VCTC determines the preferred method and distribution of sales tax revenue for transportation improvements, when applicable.

- **VCTC Intercity** – VCTC provides intercity bus service connecting the cities within Ventura county and between neighboring Santa Barbara and Los Angeles counties. With a fleet of 36 over-the-road coach buses, VCTC Intercity operates 1.5 million revenue miles and carries 650,000 passengers annually. The cities served are Camarillo, Fillmore, Moorpark, Oxnard, Santa Paula, Simi Valley, Thousand Oaks, and Ventura.
- **Valley Express Transit Service** – VCTC manages and administers the Valley Express Transit Service, which serves the Heritage Valley including Santa Paula, Fillmore and Piru.

The County of Ventura, which VCTC serves, includes a population of about 842,009<sup>1</sup> persons residing in over 1,845 square miles of land. The county's make-up ranges from urban and suburban cities to rural towns and farming communities and varies significantly between the eastern and western portions of the county.

## **LANGUAGE ASSISTANCE GOALS**

VCTC's goal is to provide meaningful access for current and potential LEP customers of VCTC services, information and materials by developing a Language Assistance Plan (LAP) and by regular evaluation of its method and strategies.

## **RESULTS OF THE FOUR FACTOR ANALYSIS**

Title VI of the Civil Rights Act of 1964, Federal Executive Order 13166 and the U.S. Department of Transportation's (U.S. DOT) Limited English Proficiency (LEP) Guidelines combine to require agencies which receive Federal funding to make reasonable accommodations for those with limited English proficiency. This analysis describes VCTC's efforts to comply with these requirements.

Title VI prohibits recipients of Federal funding from discriminating based on national origin, including LEP individuals, defined as those who have a limited ability to read, write, speak, or understand English. Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency" (2000), operationalizes non-discrimination for LEP populations by directing Federal agencies to publish guidance for funding recipients as to how to meet these statutory obligations.

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<sup>1</sup> U.S. Census Bureau – American Community Survey 5-Year Estimates Data Profiles

According to U.S. DOT guidance concerning persons with LEP, the extent of Federally funded recipients' obligations to accommodate LEP populations is determined by undertaking the U.S. Department of Transportation (U.S. DOT) four-factor LEP analysis which considers the following:

**Factor 1** - The number or proportion of LEP persons to be served or likely to be encountered in a VCTC program, activity, or service.

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

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

**Factor 4** - The resources available to VCTC and overall cost to provide LEP assistance.

VCTC utilizes the DOJ's Safe Harbor Provision, which outlines circumstances that can provide a "safe harbor" for recipients regarding translation of written materials for LEP populations. The 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.

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 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.

A recipient may determine, based on the Four Factor Analysis, that even though a language group meets the threshold specified by the Safe Harbor Provision, written translation may not be an effective means to provide language assistance measures. For example, a recipient may determine that a large number of persons in that language group have low literacy skills in their native language and therefore require oral interpretation. In such cases, background documentation regarding the determination shall be provided to FTA in the Title VI Program.

**Factor 1** - The number or proportion of LEP persons to be served or likely to be encountered in a VCTC program, activity, or service.

The USDOT LEP guidance directs recipients of Federal funding to identify the number or proportion of LEP individuals that are likely to come into contact with Federally-funded services and programs. For the purposes of this analysis, those individuals over five years of age who self-identify as speaking English less than well will be considered LEP persons.

### Data Sources

The following data sources were used to assess the prevalence of LEP populations in VCTC's service area:

- 2018-2022 American Community Survey (ACS) 5-year estimates, for large language families and individual languages
- California Department of Education – English Learner (EL) Data, 2022-2023 school year

### American Community Survey

VCTC used American Community Survey (American Community Survey 5-Year Estimates, 2022) and California's Department of Education 2022-2023 data to identify LEP populations within its service area. The American Community Survey provides information on the number of people who 'Speak English less than "very well"' also referred to as Limited English Proficient persons. The California Department of Education data compares student 'English Learners' populations with 'Fluent English Proficiency' populations to determine the number or proportion of LEP persons to be served or likely to be encountered in a VCTC program, activity, or service.

According to Table 1, 38% of the Ventura County population speak a language at home other than English with Spanish being the most common language spoken by those who 'Speak English "less than very well"' at 29.8%. Thirty-eight percent of people five years or older in Ventura County speak a language at home other than English. 39.6% of the population speaks Spanish at home and 'Speak English less than "very well"'.

Table 1 - Language Spoken at Home<sup>2</sup>

			Speak English only or speak English "very well"	Percent speak English only or speak English "very well"	Speak English less than "very well"	Percent speak English less than "very well"
Label	Estimate	Percent	Estimate	Percent	Estimate	Percent
Population 5 years and over	796,345	-	680,590	85.50%	115,755	14.50%
Speak only English	493,871	62.00%	-	-	-	-
Speak a language other than English	302,474	38.00%	186,719	61.70%	115,755	38.30%
<b>Speak a language other than English</b>						
Spanish	237,482	29.80%	143,392	60.40%	94,090	39.60%
Other Indo-European languages	23,374	2.90%	18,521	79.20%	4,853	20.80%
Asian and Pacific Island languages	33,247	4.20%	20,162	60.60%	13,085	39.40%
Other languages	8,371	1.10%	4,644	55.50%	3,727	44.50%
<b>Citizens 18 years and older</b>						
All citizens 18 years old and over	573,110	-	522,928	91.20%	50,182	8.80%
Speak only English	399,992	69.80%	-	-	-	-
Speak a language other than English	173,118	30.20%	122,936	71.00%	50,182	29.00%
Spanish	130,672	22.80%	92,967	71.10%	37,705	28.90%
Other languages	42,446	7.40%	29,969	70.60%	12,477	29.40%

Table 2 shows the languages spoken at home by ability to speak English for persons five years of age and older. Of the 29.8% of the population that speak Spanish, 11.8% 'Speak English "less than very well"'.

<sup>2</sup> U.S. Census Bureau: S1601 Language Spoken at Home

Table 2 - California English Learners Data 2022-23

Language	Total Enrollment	Number of English Learners (EL)	Number of Fluent English Proficient (FEP) Students	Total Number of EL and FEP Students	Percent of Total Enrollment that is EL and FEP
Spanish		25,032	20,408	45,440	35.8
Mixteco		1,027	382	1,409	1.11
Mandarin (Putonghua)		113	461	574	0.45
Filipino (Pilipino or Tagalog)		152	392	544	0.43
Other non-English languages		187	348	535	0.42
Vietnamese		134	279	413	0.33
Arabic		136	209	345	0.27
Farsi (Persian)		82	212	294	0.23
Russian		83	190	273	0.22
Hindi		45	180	225	0.18
Korean		40	174	214	0.17
Telugu		37	153	190	0.15
Japanese		37	105	142	0.11
Tamil		27	108	135	0.11
Hebrew		17	117	134	0.11
Punjabi		47	76	123	0.1
German		23	83	106	0.08
Gujarati		22	83	105	0.08
French		26	77	103	0.08
Portuguese		26	62	88	0.07
Cantonese		17	60	77	0.06
Urdu		18	59	77	0.06
Armenian		18	51	69	0.05
Zapoteco		62	3	65	0.05
Marathi		11	38	49	0.04
Bengali		9	39	48	0.04
Thai		20	26	46	0.04
Turkish		14	28	42	0.03
Khmer (Cambodian)		10	23	33	0.03
Italian		6	26	32	0.03
Pashto		16	16	32	0.03
Polish		4	28	32	0.03
Kannada		4	22	26	0.02
Ukrainian		15	11	26	0.02
Dutch		6	18	24	0.02

Language	Total Enrollment	Number of English Learners (EL)	Number of Fluent English Proficient (FEP) Students	Total Number of EL and FEP Students	Percent of Total Enrollment that is EL and FEP
Hungarian		5	18	23	0.02
Rumanian		1	15	16	0.01
Cebuano (Visayan)		4	11	15	0.01
Albanian		5	9	14	0.01
Samoaan		5	8	13	0.01
Ilocano		3	10	13	0.01
Indonesian		5	8	13	0.01
Swedish		5	5	10	0.01
Assyrian		3	6	9	0.01
Serbo-Croatian (Bosnian, Croatian, Serbian)			8	8	0.01
Bulgarian		4	3	7	0.01
Greek		1	5	6	0
Burmese		4	1	5	0
Malayalam		3	2	5	0
Taiwanese		1	3	4	0
Lao		1	3	4	0
Amharic		2	2	4	0
Kurdish (Kurdi, Kurmanji)			3	3	0
Chaozhou (Chiuchow)			2	2	0
Mayan Languages		2		2	0
Kashmiri		1		1	0
Igbo			1	1	0
Mongolian			1	1	0
Somali			1	1	0
Uzbek			1	1	0
Khmu			1	1	0
Swahili		1		1	0
Hmong		1		1	0
Tongan		1		1	0
Marshallese					0
Toishanese					0
Lahu					0
Tigrinya					0
<b>Ventura County Total</b>	<b>126,932</b>	<b>27,581</b>	<b>24,674</b>	<b>52,255</b>	<b>41.17</b>
<b>California State Total</b>	<b>5,852,348</b>	<b>1,112,535</b>	<b>1,197,776</b>	<b>2,310,311</b>	<b>39.48</b>

There are six languages that have more than 1,000 persons who speak English less than “Very Well”: Spanish, Tagalog (incl. Filipino), Chinese, Persian, Vietnamese, and Arabic. Thus, per the guidelines, these would qualify as “Safe Harbor” languages requiring the translation of vital documents. According to FTA guidance under C4702.1B, vital written documents include, but are not limited to, consent and complaint forms; intake and application forms with the potential for important consequences; written notices of rights; notices of denials, losses, or decreases in benefits or services; and notices advising LEP individuals of free language assistance services. LEP populations that qualify as Safe Harbor Languages and their share of the total LEP population is summarized in Table 3.

Table 3 - Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over<sup>3</sup>

Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over	Estimate	% of Total Population
Spanish: Speak English less than "very well"	95,158	12.1%
Tagalog (incl. Filipino): Speak English less than "very well"	4,550	0.6%
Other and unspecified languages: Speak English less than "very well"	4,116	0.5%
Chinese (incl. Mandarin, Cantonese): Speak English less than "very well"	2,926	0.4%
Persian (incl. Farsi, Dari): Speak English less than "very well"	2,220	0.3%
Vietnamese: Speak English less than "very well"	1,988	0.3%
Arabic: Speak English less than "very well"	1,302	0.2%
Korean: Speak English less than "very well"	773	0.1%
Thai, Lao, or other Tai-Kadai languages: Speak English less than "very well"	708	0.1%
Gujarati: Speak English less than "very well"	705	0.1%
Ilocano, Samoan, Hawaiian, or other Austronesian languages: Speak English less than "very well"	659	0.1%
Russian: Speak English less than "very well"	400	0.1%
Ukrainian or other Slavic languages: Speak English less than "very well"	295	0.0%
Other Indo-European languages: Speak English less than "very well"	238	0.0%
Armenian: Speak English less than "very well"	226	0.0%
Punjabi: Speak English less than "very well"	200	0.0%
Italian: Speak English less than "very well"	192	0.0%
Greek: Speak English less than "very well"	178	0.0%
Japanese: Speak English less than "very well"	165	0.0%
Hindi: Speak English less than "very well"	159	0.0%
German: Speak English less than "very well"	150	0.0%
French (incl. Cajun): Speak English less than "very well"	136	0.0%

<sup>3</sup> U.S. Census Bureau – B16001: Language Spoken at Home by Ability Speak English for the Population 5 Years and Over

Portuguese: Speak English less than "very well"	134	0.0%
Yiddish, Pennsylvania Dutch or other West Germanic languages: Speak English less than "very well"	105	0.0%
Malayalam, Kannada, or other Dravidian languages: Speak English less than "very well"	98	0.0%
Urdu: Speak English less than "very well"	91	0.0%
Nepali, Marathi, or other Indic languages: Speak English less than "very well"	91	0.0%
Tamil: Speak English less than "very well"	47	0.0%
Telugu: Speak English less than "very well"	41	0.0%
Haitian: Speak English less than "very well"	0	0.0%
Polish: Speak English less than "very well"	0	0.0%
Serbo-Croatian: Speak English less than "very well"	0	0.0%
Bengali: Speak English less than "very well"	0	0.0%
Hmong: Speak English less than "very well"	0	0.0%
Khmer: Speak English less than "very well"	0	0.0%
Other languages of Asia: Speak English less than "very well"	0	0.0%
Hebrew: Speak English less than "very well"	0	0.0%
Amharic, Somali, or other Afro-Asiatic languages: Speak English less than "very well"	0	0.0%
Yoruba, Twi, Igbo, or other languages of Western Africa: Speak English less than "very well"	0	0.0%
Swahili or other languages of Central, Eastern, and Southern Africa: Speak English less than "very well"	0	0.0%
Navajo: Speak English less than "very well"	0	0.0%
Other Native languages of North America: Speak English less than "very well"	0	0.0%

## **CALIFORNIA DEPARTMENT OF EDUCATION – ENGLISH LEARNER (EL) DATA 2022-23**

In addition, FTA recommends seeking school enrollment data to verify the languages spoken in the service area. The California Department of Education collects information regarding the number of students who are English learners and the languages that they use at home. An English learner is defined as an individual who lacks the clearly defined English language skills of listening comprehension, speaking, reading, and writing necessary to success in the school's regular instructional program. VCTC used the latest available data for the 2022-23 school year for this analysis.

California Department of Education's survey provides an additional source of data to identify possible LEP populations. While the State's school data has its shortcomings -- missing households and individuals without school age children; double counting households with two or more children in the schools; and in some cases, missing households where the school children are

fluent in English, but other members of the household are not-- it does provide valuable information about minority and immigrant populations.

Looking at the county totals based on data from the California Department of Education's annual census of students, the most frequently spoken language other than English is Spanish. Ventura County's 2022 – 2023 school year data show a student population of 126,932. The number of Spanish speaking English Learners is 25,032 (35.8 percent of the total enrollment that is EL and FEP). The next largest groups of non-English speakers were Mixteco (which is only an oral language) at 1,027 (1.11%); Mandarin - Putonghua, 113 (0.45%); Filipino – Pilipino or Tagalog, 152 (0.43%), (0.13%); Vietnamese, 134 (0.33%), and Arabic, 136 (0.27%).

Given the very low percentages of people who 'Speak English less than "very well" other than Spanish language speakers, and the fact that that in the past 18 years, VCTC has reported no phone calls, office walk-ins, or written requests for languages other than English or Spanish. VCTC intends to add Chinese (Mandarin) to its' translated language portfolio due to Thousand Oaks Transit adding the language to their Title VI Program. Although, Google Translate is not perfect, it provides an additional layer for website translations that can supplement translation materials available to the public. The translation of individual documents will be provided upon request.

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

VCTC works with local advocacy groups such as Central Coast Alliance United for a Sustainable Economy (CAUSE), One Step A La Vez, as well as Neighborhood Community Councils to inform LEP populations.

Although Title VI regulations for LEP individuals cover only written materials, a Spanish interpreter is available at the annual Unmet Transit Needs community meetings, virtual meetings, and Public Hearings. VCTC's Regional Transit Information Center (RTIC) employs bilingual staff to field transit-related phone calls within Ventura County.

VCTC Intercity (contracted with RATP Dev) dispatch and the Valley Express Bus & Dial-A-Ride (contracted with MV Transportation) reservation center have bilingual staff members. For RATP Dev, the breakdown of Spanish speaking staff consists of: drivers (83%), dispatchers (60%), and 25% management with 25% also speaking Indian. Valley Express Bus & Dial-A-Ride operates in non-urban portions of the Santa Clara River Valley. The breakdown of Spanish speaking staff consists of: drivers (71%), dispatchers (100%), and management (75%).

VCTC prints vital materials in English and Spanish including but not limited to: ADA applications, notices of denial, and complaint forms; photo/media consent forms; rider alerts of decreased service; surveys; and the Unmet Transit Needs process information (and Chinese – Mandarin as part of the 2024 Assessment).

Vital written documents include, but are not limited to, consent and complaint forms; intake and application forms with the potential for important consequences; written notices of rights; notices of denials, losses, or decreases in benefits or services; and notices advising LEP individuals of free language assistance services. Examples of vital documents include an ADA complementary paratransit eligibility application, a Title VI complaint form, notice of a person's rights under Title VI, and other documents that provide access to essential services. Failure to translate these vital documents could result in a recipient denying an eligible LEP person access to services and discrimination based on national origin.

The frequency that LEP persons encounter VCTC Intercity transit programs, activities, or services varies by individual circumstances. A very small proportion of the population uses regional or local transit services. According to the American Community Survey 2022 estimates<sup>4</sup>, only about 0.5% of 'Workers 16 years or over' use public transportation as a means for workplace travel. Transit is used by people to access medical facilities, shopping centers, educational facilities, government resources, homeless shelters, to visit friends and family however, the number of transit users is still relatively small.

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

VCTC understands that its services are used for transportation to work, school, shopping, medical appointments, and other quality-of-life activities. For transit-dependent individuals, VCTC transit services are extremely important. For this reason, VCTC is committed to translating vital documents relating to its service. Vital documents are those that demonstrate where and how to use VCTC Intercity bus, how to access services and additional information, and information about VCTC's Title VI program. At this time VCTC does not have the funds required to translate all written materials -- such an undertaking would incur substantial costs and require substantial resources. In addition, VCTC will continue to offer language interpretation at public meetings when requested. Providing interpretation services to allow LEP populations to participate by obtaining information about VCTC services has been a core activity at VCTC since its creation.

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<sup>4</sup> U.S. Census Bureau – S0804: Means of Transportation to Work by Selected Characteristics for Workplace Geography

**Factor 4** - The resources available to VCTC and overall cost to provide LEP assistance.

As VCTC serves a vast area, outreach is varied and event specific. VCTC Public Participation Plans for various projects lay out the types of public outreach activities that will be undertaken for the various levels of public events. VCTC will continue working with local advocacy groups like CAUSE to ensure contact with LEP populations; there is little to no cost to the agency to do this although it does take time.

## **IMPLEMENTATION PLAN**

### **LANGUAGE ASSISTANCE MEASURES**

VCTC will continue to use a variety of techniques or practices to provide meaningful, early, and continuous opportunities for all interested Ventura County residents to participate in the dialogue that informs key decisions, regardless of language barriers. This is done in several ways, including:

#### General Measures or Practices

- Review prior experiences with LEP populations to determine the language services needed.
- Robust use of maps, charts, and photographs to illustrate trends, choices being debated, etc.
- Translate to Spanish various printed materials for the transit services provided by VCTC including but not limited to VCTC Intercity services; Valley Express Bus & Dial-A-Ride services; fare media and other farebox information; freeway call box information; ADA certification materials and services; community outreach event notices; and regional Rideshare materials.
- Work to involve non-profit groups that advocate for persons with limited English proficiency.
- Identify areas within the service area with high concentrations of LEP individuals.
- Include LEP populations in transit rider surveys.
- Translation of vital documents including certain news releases, brochures, fact sheets and Unmet Transit Needs notices.
- All translated documents will be posted onto the VCTC website.
- Contract with a translation service to handle calls in foreign languages on an as-needed basis
- Ensure competency of translators; have interpreters available, if requested 3 days in advance (72 hours) at meetings.
- Employ multi-lingual staff at the VCTC Regional Transit Information Center.

- Encourage multi-lingual transit dispatch staff and transit operators.

#### Local Community Media

- Work with Spanish language media outlets to place articles about VCTC's work or announce participation opportunities.
- Purchase display ads (when cost-effective) in Spanish language community newspapers to announce public hearings.

#### Outreach Techniques

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 in an alternative language based on the known LEP population. Interpreters may be available as needed. VCTC will continue to develop relationships with organizations that serve LEP individuals.

## **MONITORING AND UPDATING OF THE LANGUAGE ASSISTANCE PLAN (LAP)**

VCTC will monitor requests for translations and adjust practices to meet demand while maintaining a basic level of access by LEP populations to key programs and documents. VCTC's Language Assistance Plan (LAP) will be updated periodically as required by U.S. DOT and as needed to reflect significant changes. At minimum, the plan will be reviewed and updated when data from new ACS counts are available, or when it is clear that higher concentrations of LEP individuals are present in Ventura County. Updates will include the following:

- How the needs of LEP persons have been addressed
- Determination of the current LEP population in the service area per the latest Census reports at the community level.
- Determination as to whether the need for translation services has changed or whether a change in the contractor used for translation services is warranted based on geographical proximity or availability at times needed.
- Determine whether VCTC's financial resources are sufficient to fund bilingual or multi-lingual language assistance resources needed.
- Determine whether VCTC has fully complied with the goals of this LAP Plan.
- Determine whether complaints have been received concerning VCTC's failure to meet the needs of LEP individuals.
- Regularly assess the effectiveness of how VCTC communicates with LEP individuals through use of surveys, conversations with advocacy groups etc.

## **STAFF TRAINING**

VCTC works to instill its staff with an awareness of and sensitivity to the needs of LEP residents. The following training will be provided to VCTC staff:

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

### Dissemination of the VCTC Language Assistance Plan

A link to the VCTC LAP and the Title VI Procedures is included on the VCTC website at [www.goventura.org/vctc-transit/riding-vctc/#title-vi](http://www.goventura.org/vctc-transit/riding-vctc/#title-vi)

Any person or agency may request a copy of the plan via telephone, fax, mail, e-mail or in person and shall be provided a copy of the plan at no cost. LEP individuals may also request translated copies of the plan.

Questions or comments regarding the LAP may be submitted to the Ventura County Transportation Commission, Title VI Coordinator:

Attn: Peter De Haan, Director of Programming

Ventura County Transportation Commission

751 E. Daily Drive #420 Camarillo, CA 93010

Office: 805.642.1591

Email: [pdehaan@goventura.org](mailto:pdehaan@goventura.org)

## **MEMBERSHIP OF NON-ELECTED COMMITTEES & COUNCILS**

While VCTC does have transit-related, non-elected advisory committees, VCTC does not have control on appointing members, therefore, this requirement does not apply to VCTC.

The Commission is established by California State law; 15 of the Commission members are elected members, the remaining two members are appointed by the County Board of Supervisors (1) and the Mayors' selection committee (1). The one ex-officio board member, appointed by the Governor, is usually the California Transportation Department of Transportation District 7 Director.

The VCTC also has monthly meetings of the Transit Operators Advisory Committee (TRANSCOM), which is composed of one representative from each transit service provider operating in Ventura County, one representative from each of the cities in the County, County of Ventura, Ventura County Air Pollution Control District and the California Department of Transportation – District 7.

As required by state law, VCTC has a Citizens Transportation Advisory Committee and Social Services Transportation Advisory Council (CTAC/SSTAC) which meets quarterly. Two members of the CTAC/SSTAC are citizens appointed by the individual jurisdictions in Ventura County.

The Coastal Express Policy Advisory Committee (CEPAC) meets as needed. Its members include representatives of VCTC, Gold Coast Transit District, Santa Barbara County Association of Governments, and Santa Barbara Metropolitan Transit District.

The Heritage Valley Policy Advisory Committee (HVPAC) reviews the Heritage Valley Transit services and budget, determines if any capital expenditures are required, reviews the contract for operation of the service, and discusses methods of expanding or adjusting the service to respond to the transit needs of the region. The HVPAC is composed of the VCTC Executive Director, Commission members from the Cities of Fillmore and Santa Paula, and the County Supervisor whose district represents the Cities of Fillmore and Santa Paula. HVPAC meets twice a year.

The HVTAC advises the Heritage Valley Policy Advisory Committee (HVPAC) on operational elements of the Services including routes, schedules, adjustments to the performance standards in the Heritage Valley Transit Plan, the annual budget, the annual report, and other service details. HVTAC is composed of staff representatives from VCTC, the cities of Fillmore and Santa Paula, and the County, and a member of the contract operator providing the service. HVTAC meets four times a year.

## **MONITORING SUBRECIPIENTS AND CONTRACTORS**

In accordance with 49 CFR 21.9(b), and to ensure that subrecipients are complying with the DOT Title VI regulations, primary recipients must monitor their subrecipients for compliance with the regulations. Importantly, if a subrecipient is not in compliance with the Title VI requirements, then the primary recipient is not in compliance.

The Director of Programming is responsible for all subrecipient monitoring. VCTC monitors its subrecipients by ensuring that each entity meets the criteria outlined in Chapter III of Title VI Circular 4702.1B. VCTC collects and reviews subrecipients' Title VI Programs which are approved by the subrecipients' governing board. VCTC also reviews the subrecipients' website and confirms that their Title VI Notice, Title VI complaint process and Title VI complaint form are available to the public.

VCTC's subrecipients must submit a copy of their Title VI Program triennially prior to the due date of VCTC's Title VI Program submission to the FTA. VCTC Programming staff monitors the submissions.

Each VCTC subrecipient Title VI Program includes the following:

1. A copy of the Title VI notice to the public that indicates the subrecipients' compliance with Title VI and informs the public of the protections against discrimination afforded to them by Title VI.
2. A copy of the subrecipients' instructions to the public explaining how to file Title VI complaints, including a copy of the complaint form.
3. A list of any public transportation-related Title VI investigations, complaints, or lawsuits filed with the subrecipient. The list only contains investigations, complaints, or lawsuits that pertain to allegations of discrimination based on race, color, or national origin.

## **FIXED FACILITY IMPACT ANALYSIS**

Since 2024, no operational or maintenance facilities have been constructed or are planned before the next Title VI cycle in 2027.

## **GOVERNING BODY APPROVAL OF TITLE VI PLAN**

See Attachment A for Board of Commissioner's approval of the Title VI Plan.

# PROGRAM SPECIFIC REQUIREMENTS

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VCTC Intercity bus operates fewer than 50 fixed route vehicles in peak service.

## SYSTEM-WIDE SERVICE STANDARDS

To comply with 49 CFR Section 21.5(b)(2) and 49 CFR Section 21.5(b)(7), Appendix C to 49 CFR part 21, VCTC is required to adopt system-wide service policies necessary to guard against service design and operational policies that have disparate impacts. System-wide policies differ from service standards in that they are not necessarily based on a quantitative threshold. Below are the current standards and policies:

### VEHICLE LOADS

Vehicle Load or load factor is a ratio of the number of seats on a vehicle to the number of passengers. Load factor is an indicator of the extent of probable overcrowding or the need for additional vehicles. It is also a means to determine whether the level of service on a particular route at a particular time is adequate to assure a level of service deemed appropriate for the transit system. As a service standard, load factor is typically expressed as a ratio (e.g., 1:1 or 1 seat for every 1 passengers). The load factor is determined by taking the number of seats on a specific route which pass the peak point during the peak hour and dividing that into the number of passengers that are carried past that point during that hour. Vehicle loads are monitored for all routes to determine if additional vehicles are needed to avoid overcrowding. If load factors are exceeded on a regular basis, VCTC will consider adjustments to the schedule.

VCTC Intercity: Vehicle load shall not exceed 1:1 for VCTC Intercity service,

Valley Express: Vehicle load shall not exceed 1:1 for Valley Express fixed-route vehicles.

### VEHICLE HEADWAYS

Vehicle headway is a measurement of the time interval between two vehicles traveling in the same direction on the same route. The frequency of service is a general indication of the level of service provided along a route and a factor in the calculation of the amount of travel time expended by a passenger to reach their destination. It is generally expressed for peak and off-peak service as an increment of time.

Local bus service is usually more frequent than intercity bus service because the travel distance is generally longer on intercity buses. This is the case for VCTC Intercity services that traverse the county and into neighboring counties to connect with other bus operations and commuter rail.

VCTC Intercity: Scheduled VCTC Intercity headways ranged from less than 30 minutes during peak hours to over two hours for the longer limited runs. Because service to both Los Angeles and Santa Barbara counties is limited, the minimum headways standard shall apply only to VCTC Intercity "intra-county" routes operating within Ventura County. The variation in headways between VCTC Intercity routes and time of day is largely based on the travel patterns and needs of commuters in the county matched with available funding to operate the service. For "intra-county" routes, peak period headways will be a maximum 120 minutes (2 hours), Monday through Fridays. Where offered, peak period weekend headways will be maximum 120 minutes (2 hours). Off peak service headways will be maximum 240 minutes (4 hours).

Valley Express: Peak period headways will be a maximum of 120 minutes (2 hours), Monday through Friday. Where offered, peak period weekend headways will be 120 minutes (2 hours). Off peak service headways will be maximum 240 minutes (4 hours).

## **ON-TIME PERFORMANCE**

VCTC Intercity: 85% of all runs on time (defined as no more than 8 minutes late). No buses shall arrive ahead of schedule.

Valley Express Fixed Route: 95% of all runs on time (defined as no more than 15 minutes late). No buses shall arrive ahead of schedule.

## **SERVICE AVAILABILITY**

**VCTC Intercity:** Commuter bus service differs from local transit systems in that intercity buses run longer distances and make fewer stops to pick up passengers. The VCTC Intercity buses run long distances to connect with local transit systems that serve population centers that are geographically distributed throughout the county. All local municipal bus systems (except Ojai Trolley) have access to VCTC Intercity Bus services by connecting at the most convenient locations for patronage while keeping stops to a minimum for quicker cross-county connections. The common standard used by local transit systems -- normally measured in the distance a person must travel to access transit -- does not work for VCTC Intercity services. Making VCTC Intercity available for connection to local transit systems shall be considered providing reasonable access to the VCTC Intercity bus system.

**Valley Express Bus:** Operates fixed route, ADA-paratransit, and general public Dial-A-Ride through the Heritage Valley in Ventura County. The service is provided in the communities of Fillmore, Santa Paula, and the unincorporated communities of Piru and Saticoy through a cooperative agreement between the Cities of Fillmore, Santa Paula, the County of Ventura, and the Ventura County Transportation Commission. It is managed and administered by VCTC.

## **SYSTEM-WIDE SERVICE POLICIES**

### **Transit Amenities**

The VCTC Intercity bus system is a regional commuter system and relies on facilities provided by local transit agencies, Cities, the County, and others for bus stop locations. VCTC selects intercity stop locations to ensure equal access to these amenities by the public.

VCTC Intercity has not installed bus stops or shelters at stop locations and has no plans to do so in the future. All bus stop amenities and bus shelter locations are determined by the jurisdictions which own and control the sites. Most VCTC Intercity bus stops are at locations shared with the local transit provider. Working with local agencies, VCTC makes every effort to place an infopost and sign-blade at every stop.

Any benches, shelters and facilities that exist where VCTC Intercity bus provides service have been provided by another entity, except for the Camarillo Transit Station which is owned by VCTC. GOVCbus, the real-time bus locating technology, is available online ([www.GOVcBus.com](http://www.GOVcBus.com)), via text (41411) or app (iOS and Android), and telephone (805.430.0298).

### **Vehicle Assignment**

All 36 of the VCTC Intercity buses are similar, 45' over-the-road motor coaches and use similar fuel. Because of this, all buses are interchangeable; vehicle assignments are done in a manner that ensures rotation of fleet vehicles throughout all the routes in the VCTC Intercity system.

The Valley Express fleet is made up of five (5) small, five (5) medium, and five (5) large cutaways for a total fleet of 15 cutaway vehicles. Based on capacity, the larger vehicles are assigned to fixed route and the and medium vehicles are assigned to Dial-a-Ride service; vehicle assignments are done in a manner that ensures rotation of fleet vehicles throughout the service area.

# ATTACHMENT A

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## Sample Letter Acknowledging Receipt of Complaint

Today' s Date

Jo Doe  
1234 Main St.  
Ventura, CA 93001

Dear Ms. Doe:

This letter is to acknowledge receipt of your complaint against the Ventura County Transportation Commission alleging \_\_\_\_\_  
\_\_\_\_\_.

An investigation will begin shortly. If you have additional information you wish to convey or questions concerning this matter, please feel free to contact this office using the information below.

Sincerely,

Peter DeHaan  
Title VI Coordinator  
Director of Programming  
Ventura County Transportation Commission  
751 E. Daily Drive, Suite 420  
Camarillo, CA 93010  
Office: 805-642-1591  
Email: [pdehaan@goventura.org](mailto:pdehaan@goventura.org)

Sample Letter Notifying Complainant that the Complaint Is Substantiated

Today' s Date

Jo Doe  
1234 Main St.  
Ventura, CA 93001

Dear Ms. Doe:

The matter referenced in your letter of \_\_\_\_\_ (date) against the Ventura County Transportation Commission alleging Title VI violation has been investigated.

(An/Several) apparent violation(s) of Title VI of the Civil Rights Act of 1964, including those mentioned in your letter (was/were) identified. Efforts are underway to correct these deficiencies.

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

Sincerely,

Peter DeHaan  
Title VI Coordinator  
Director of Programming  
Ventura County Transportation Commission  
751 E. Daily Drive, Suite 420  
Camarillo, CA 93010  
Office: 805-642-1591  
Email: [pdehaan@goventura.org](mailto:pdehaan@goventura.org)

Sample Letter Notifying Complainant that the Complaint Is Not Substantiated

Today' s Date

Jo Doe  
1234 Main St.  
Ventura, CA 93001

Dear Ms. Doe:

The matter referenced in your complaint of \_\_\_\_\_ (date) against the Ventura County Transportation Commission alleging \_\_\_\_\_ has been investigated.

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

The Ventura County Transportation Commission has analyzed the materials and facts pertaining to your case for evidence of the VCTC's failure to comply with any of the civil rights laws. There was no evidence found that any of these laws have been violated.

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

You have the right to 1) appeal within seven (7) calendar days of receipt of this final written decision from Ventura County Transportation Commission, and/or 2) file a complaint externally with the U.S. Department of Transportation and/or the Federal Transit Administration at:

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

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

Sincerely,

Peter DeHaan  
Title VI Coordinator  
Director of Programming  
Ventura County Transportation Commission  
751 E. Daily Drive, Suite 420  
Camarillo, CA 93010  
Office: 805-642-1591  
Email: [pdehaan@goventura.org](mailto:pdehaan@goventura.org)

# ATTACHMENT B

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Governing Board Approval of Title VI Plan

**9J. PURCHASE OF COUNTYWIDE REPLACEMENT FAREBOXES**

**Recommendation:**

- *Approve purchase of new fareboxes and supporting equipment from Genfare in not to exceed amount of \$5,000,000.*

**9K. METROLINK BUDGET AMENDMENT**

**Recommendation:**

- *Amend the FY 2023-2024 VCTC Metrolink budget by adding \$714,000 in Transit and Intercity Rail Capital Program (TIRCP) revenues and increasing the Station Rehabilitation expense line item by \$579,000, legal line item by \$113,000, staff wages line item by \$8,000, fringe line item by \$3,800 and indirect line item by \$10,200.*

**9L. SECOND AMENDMENT TO EXECUTIVE DIRECTOR EMPLOYMENT AGREEMENT WITH MARTIN ERICKSON-**

**Recommendation:**

- *It is recommended that the Ventura County Transportation Commission ("Commission") adopt a resolution approving the Second Amendment to the Employment Agreement (Second Amended Agreement") between the Commission and Martin Erickson to serve as Executive Director of VCTC and its related agencies and authorizing Chairperson LaVere to execute the Second Amended Agreement.*

**DISCUSSION CALENDAR:**

**10. UNMET TRANSIT NEEDS-**

**Recommendation:**

- *Review and Approve the Fiscal Year 2024/2025 Unmet Transit Needs Findings and determination that there are no Unmet Transit Needs that are reasonable to meet.*
- *Adopt Resolution No. 2024-05*

Dolores Lopez gave a PowerPoint presentation on item 10 Unmet Transit Needs.

Commissioner Chavez moved to approve item 10 Unmet Transit Needs (UTN) Findings. The motion was seconded by Commissioner Johnson and passed unanimously.

**11. 2024 TITLE VI PROGRAM UPDATE-**

**Recommendation:**

- *Approve VCTC's 2024 Title VI Program Update*

Aubrey Smith gave a PowerPoint presentation on item 11 2024 Title VI Program Update.

Commissioner Trembley moved to approve item 11 Title VI Program Update. The motion was seconded by Commissioner Engler and passed unanimously.

**12. INCIDENT RESPONDER GRANT PROGRAM ROUND 3 ALLOCATIONS-**

**Recommendation:**

- *Approve an amendment to the Motorist Aid Program Budget for Fiscal Year 2023/2024 to increase expenditures in the Incident Responder Grant Program line item by \$355,852 and a corresponding \$355,852 increase in the SAFE Fund Revenues line item.*
- *Approve recommended allocations for the Incident Responder Grant Program Round 3 awards.*

Andrew Kent gave a PowerPoint presentation on item 12 Incident Responder Grant Program Round 3 Allocations.

Commissioner Trembley moved to approve item 12 Incident Responder Grant Program Round 3 Allocations. The