North of the River Recreation & Park District
TITLE VI PROGRAM

Adopted by the NOR Board of Directors:
September 2018

Joe West, Transportation Supervisor

North of the River Recreation & Park District
3825 Riverlakes Dr
Bakersfield, CA 93312

This document was prepared by North of the River Recreation & Park District (NOR) and approved by its Board of Directors to comply with Title VI of the Civil Rights Act of 1964, including new provisions detailed in U.S. Department of Transportation's FTA Circular 4702.1B, "Title VI Requirement and Guidelines for Federal Transit Administration Recipients."

Table of Contents

Title VI Notice to the Public 4

List of Locations Where Title VI Notice Is Posted 5

Title VI Complaint Procedures 6

Title VI Complaint Form 7

List of Transit-Related Title VI Investigations, Complaints, and Lawsuits 9

Public Participation Plan 10

Summary of Outreach Efforts Made 16

Language Assistance Plan 18

Table Depicting the Membership of Non-Elected Committees And Councils 34

Description of Sub recipient Monitoring and Schedule of Sub recipient Title VI Program Submissions 34

Title VI Equity Analysis 34

Board of Directors Approval of NOR/CTSA's Title VI Program 35

NOR's Title VI Notice to the Public

Notifying the Public of Rights under Title VI

The North of the River Recreation and Park District is committed to ensuring that no person shall be excluded from the equal distribution of its services and amenities because of race, color or national origin in accordance with Title VI of the Civil Rights Act of 1964.

- NOR provides services and operates programs without regard to race, color, and national origin in full compliance with Title VI.
- Any person who believes he or she has been aggrieved by any unlawful discriminatory practice under Title VI while using NOR services may file a complaint with NOR. All complaints will be fairly and objectively investigated.
- To file a complaint, you may contact our Title VI Program Administrator, Joe West at (661) 392-2000; or by email: jwest@norrecreation.org; or visit NOR's district offices at 3825 Riverlakes Dr. Bakersfield, CA 93312.
- For more information about NOR's Title VI program and complaint procedure, contact (661) 392-2035; or visit NOR's website: http://www.norfun.org
- A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Title VI Program Coordinator, FTA Office of Civil Rights, East Building, 5th Floor – TCR, 1200 New Jersey Ave., S.E., Washington, D.C. 20590

Updated 2018

List of Locations Where Title VI Notice Is Posted

NOR's Title VI notice to the public is currently posted at the following locations:

Location Name	Address	City
NOR District Office	3825 Riverlakes Dr	Bakersfield
CTSA Office	222 Minner Ave	Bakersfield
Transit Vehicles	222 Minner Ave	Bakersfield
NOR website:	www.norfun.org	Internet Location

The Title VI notice and program information is also provided on NOR's website at:
http://www.norfun.org

Title VI Complaint Procedures

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by the North of the River Recreation and Park District may file a Title VI complaint by completing and submitting NOR's Title VI Complaint Form. NOR investigates complaints received no more than 180 days after the alleged incident. The District will only process complaints that are complete.

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

- Within 10 business days of receiving the complaint, the NOR Title VI Program Administrator Joe West will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office.
- The investigation will be conducted and completed within 30 days of the receipt of the formal complaint.
- If more information is needed to resolve the case, NOR may contact the complainant. The complainant has 10 business days from the date of the letter to send requested information to Mr. West, Title VI Administrator investigator. If the investigator is not contacted by the complainant or does not receive the additional information within 10 business days, NOR can administratively close the case.
- The complainant will be notified in writing of the cause to any planned extension to the 30-day rule.
- A case can be administratively closed also if the complainant no longer wishes to pursue their case. Following the investigation, the Title VI Administrator will issue one of two letters to the complainant: 1) a closure letter or 2) a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. A LOF 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.
- If the complainant is unsatisfied with the decision, he/she has 30 days after the date of NOR's closure letter or the LOF to appeal to the NOR Board of Directors or its designee. The complainant is entitled to review the denial, to present additional information and arguments, and to separation of functions (i.e. a decision by a person not involved with the initial decision to deny eligibility). The complainant is entitled to receive written notification of the decision of the appeal and the reasons for it.
- The complainant may also file a complaint directly with the Federal Transit Administration, as follows: Title VI Program Coordinator, FTA Office of Civil Rights, East Building, 5th Floor – TCR, 1200 New Jersey Ave., S.E., Washington, D.C. 20590

North of the River Recreation & Park District
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/yyyyy)*

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.

North of the River Recreation & Park District
Title VI Complaint Form,
Page 2

Section IV:		
14. Have you previously filed a Title VI complaint with NOR?	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:

NOR Title VI Program Administrator
3825 Riverlakes Dr
Bakersfield, CA 93312

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

North of the River Recreation and park District has not been involved in any transit-related Title VI investigations, complaints, or lawsuits.

North of the River Recreation and Park District's Public Participation Plan

Updated: September 2018

Joe West, Transportation Supervisor
North of the River Recreation and Park District
3825 Riverlakes Dr
Bakersfield, CA 93312

Public Participation Plan
Table of Contents

1. Introduction

Purposes of This Plan 12

2. Public Participation Process 12

Approach to Public Participation 12

Outreach Requirements and Activities 13

1. Introduction

Purposes of This Plan

This plan provides guidelines for involving the public in North of the River Recreation and Park District's planning efforts to ensure that all groups are represented and their needs considered.

NOR operating the Consolidated Transportation Service Agency (CTSA) is committed to ensuring it serves the city of Bakersfield and unincorporated areas of greater Bakersfield fairly, consistently and in the most cost-efficient and appropriate manner within available resources. Through conversation and collaboration with riders, prospective riders, and the larger surrounding community, NOR/CTSA will be able to assess the quality of its service, measure potential impacts to the community from NOR/CTSA initiatives or proposed initiatives, and ensure that it is providing valuable services to the residents of the greater Bakersfield area.

2. Public Participation Process

Approach to Public Participation

The public participation process should be considered at the earliest stages of any NOR/CTSA project that may impact the surrounding community, its riders, and potential riders. As projects vary in time and size, the public participation process may vary for each, as well as the extent of public participation. The following outlines tools and strategies to ensure that public input is invited and all foreseeable impacts to the community are considered.

NOR/CTSA has developed two levels of projects to establish minimum public participation requirements. At the beginning of any project, staff will identify into which category that project falls and develop a participation plan accordingly. At any time during its process, the project may be reclassified to a higher level, if CTSA/NOR's staff deems appropriate.

The levels are as follows:

Level One: Routine service, route and any short-term projects whose impact on CTSA's riders and potential riders needs to be identified during planning stages.

Examples of projects include minor route and service changes; routine rider surveys; changes to fare media; etc.

Level Two: Longer term or larger scale projects are those whose impact on CTSA's riders and potential riders needs to be identified during planning stages. These may include fare changes or modifications, Short and Long Range Transportation Plans, Comprehensive Operational Analysis, marketing plans, coordination plans, alternative analyses, studies to implement new services; or facility or yard construction projects, etc. As many of these projects are conducted by contractors, part of the RFP requirements and criteria for scoring proposals will include developing the 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 riders and potential riders in the Greater Bakersfield area have equal access and opportunity to participate in transportation planning and decision-making. These also provide strategies for soliciting input and engaging various communities.

Level One

Level One projects include routine service, route, fare changes and any short-term projects whose impact on CTSA's riders and potential riders needs to be identified during planning stages. Examples of projects include route, fare and service changes; etc.

Minimum Outreach Requirements

- Notice for public events may include posters, email blasts, media releases to local papers, or radio announcements if funding allows.
- Any notices will be posted at least two weeks prior to the public event.
- Notices may be posted at CTSA/NOR headquarters, on buses and at key community centers with whom CTSA/NOR has a relationship.
- Information about public participation opportunities will also be posted on NOR's website at least two weeks prior to the event.
- Comments will be accepted via the NOR website, at public outreach events, via email, by mail, and by phone to ensure that all populations have the opportunity to participate.

Outreach Methods to Engage Minority and Limited English Proficient Populations

- Notices will be made bilingual or Spanish language notices will be developed and posted with English notices.
- Spanish-language notices will be posted on vehicles that have been identified as key routes used by an LEP population and at bus shelters that have been identified as key destinations of LEP populations, if such information exists.
- Event information on NOR's website will be posted in English and Spanish.
- NOR/CTSA will distribute event information to community groups and agencies that work with LEP populations, if such contacts exist.
- As identified in its Language Assistance Plan, NOR/CTSA is developing an assistance contract with a vendor to provide language assistance for customers and callers that are non-English speaking.
- For level one projects, Spanish interpretation or translation at any public meetings or workshop may be provided by NOR/CTSA staff as is possible. When it is appropriate or necessary, NOR will insure non-English language interpretation in additional language (and in Spanish if required) is available.

Currently, Spanish is the only quantifiable population within NOR/CTSA's service area that is limited English proficient. NOR/CTSA will continue assessing the language needs of citizens in its service area through its Language Assistance Plan. At such time, as another group with limited English proficiency reaches significant mass, CTSA will review this plan and its strategies to engaging with non-English speaking populations.

Level Two

These are longer term projects whose impact on CTSA's riders and potential riders needs to be identified during planning stages. These may include Short and Long Range Transportation Plans, Comprehensive Operational Analysis, marketing plans, coordination plans, alternative analyses, studies to implement new services; etc. As many of these projects are conducted by contractors, part of the RFP requirements and criteria for scoring proposals will include developing the project's public participation process.

Minimum Outreach Requirements

Level two projects may often require a specific public participation plan that will be developed in the planning stages of the project. This plan will outline specific outreach activities, goals and objectives of the public involvement, as well as specific techniques to be used for outreach activities. The project-based public participation plan will also identify any populations requiring

specific outreach to ensure they have access to information and the opportunity to make comments regardless of race, color, or national origin.

The public participation process for level two projects will include the involvement requirements for level one projects and will be augmented with specific outreach activities appropriate for the particular projects; such as additional public workshops, focus groups and surveys. Where more the one public workshop or forum will be held, and as funding allows, one workshop will be held in the morning and a second in the evening to accommodate varying schedules. As is possible, public participation events will be held at accessible locations within the designated service area. These projects may also require the development such as fact sheets, newsletters, a project webpage, and additional media releases.

Outreach methods to engage minority and limited English proficient populations

Level Two projects will use the previously identified strategies for engage minority and limited English proficient populations, but may require additional activities depending on the scale and nature of the project.

- NOR/CTSA will continue cultivating relationships with community agencies that serve LEP populations.
- As they are identified, notices will be sent to Spanish-language magazine, newspapers, and/or radio stations.
- Public outreach events may include attending already existing community meetings and gatherings, such as school meetings, farmers markets, faith-based events, and other community activities in order to invite participation from LEP populations who may not attend NOR/CTSA hosted public events.
- NOR/CTSA will ensure that non-English language interpretation will be available at any public meeting or workshop as is appropriate and necessary.

Outreach Efforts Made Previous to Title VI Submission

NOR/CTSA's Transportation Supervisor regularly participates in reoccurring outreach with the Regional Transportation Planning Agency (Kern Council of Governments).

Reoccurring outreach locations often include:

- **Senior Centers** – NOR Senior Services Resource Fair once per year or as in invited.

  NOR Senior Centers also have CTSA's information and regularly advertise to their consumers.

- **Kern County Aging and Adult Services** – Once per year, a staff representative participates in their annual resources fair. These events are open to the public and CTSA information is presented in both English and Spanish versions.

- **Kern County Senior Directory and Healthcare Guide** – a listing for services of all types presented free to the public by Dignity Health (Mercy and Memorial Hospitals).

- **Kern Council of Governments (Kern COG) Annual Transit Unmet Needs Process** – Kern COG (the council of governments and transportation planning agency for Kern County) is required by state statute to conduct a formal hearing process that solicits information about transit needs. This allows the county transportation commission, Kern COG, to make a determination as to whether there are unmet transit needs and whether these are transit needs that can be reasonably met. The hearing processes are conducted only in those parts of the county where California Transportation Act, Local Transportation Funds (LTF) are allocated in part to public transportation. This process involves public notification in a variety of news and service notification publications (news papers, community advertisements etc.) by the multitude of transportation service providers. Each individual community, city and/or agency is required to annually conduct an Unmet Transit Needs Public Hearing.

- **Kern Council of Governments** – Annually participates in community outreach at the Kern County Fair by providing a information booth with staffing to answer general questions of assistance services available within the service area, including CTSA's and other transportation services.

- **2018 Update to the Public Transit – Human Services Transportation Coordination Plan for Kern County** – As part of it Coordinated Plan Update process, Kern COG community transit workshops were held across Kern County. Members of the public as well as human and social service agency representative were invited to attend to share transit needs and discuss projects that could address these needs. A flyer was created to advertise these workshops and distributed broadly through email blasts and by posting the flyer at each location and on agency websites.

North of the River Recreation and Park District Language Assistance Plan

Updated: September 2018

Joe West, Transportation Supervisor
North of the River Recreation and Park District
3825 Riverlakes Dr
Bakersfield, CA 93312

Language Assistance Plan
Table of Contents

1. Introduction 20
2. Overview of NOR/CTSA's Service Area and Services 21
3. Language Assistance Goals 21
4. Results of the Four Factor Analysis 21
    - Factor 1 21
    - Factor 2 23
    - Factor 3 24
    - Factor 4 & Safe Harbor Provision 25
5. Implementation Plan 26
    - Timeline/ Major Milestones 26
    - Language Service Provision 30
    - NOR's Website 31
    - Outreach 32
6. Monitoring, Evaluating, and Updating the LAP 32
7. Staff Training 33

1. Introduction

This Language Assistance Plan was developed during the process of preparing NOR's Title VI Program to ensure that CTSA services are accessible to Limited English Proficient (LEP) individuals. Title VI of the 1964 Civil Right Act is one of two federal mandates that guarantee the provision of meaningful access to federally-funded services for LEP individuals:

- Title VI of the 1964 Civil Right Act prohibits federally-funded agencies from discriminating against individuals based on race, color, and national origin and includes meaningful access to LEP customers.

- President's Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency" (August 11, 2000): Instructs federal agencies to improve access to services by mandating that any federally conducted or assisted programs of activities (e.g. recipients of federal funding) must provide meaningful access to LEP customers.

NOR/CTSA's Title VI Program was originally prepared in the spring of 2014 and updated fall of 2018 in accordance with FTA Circular 4702.1B, Title VI Requirements and Guidelines for Federal Transit Administration Recipients, October 1, 2012.

NOR/CTSA's Title VI Program
Administrator is: Joe West,
CTSA Transportation Supervisor

3825 Riverlakes Dr
Bakersfield, CA 93312.
(661) 392-2000
Email: jwest@norrecreation.org

More information about NOR/CTSA's Title VI Plan is available at:
http://www.norfun.org

2. Overview of NOR/CTSA's Service Area and Services

North of the River Recreation and Park District (NOR) is a Special District operating under Section 5780 of the California State Code. NOR plans, organizes and conducts a wide variety of Park and Recreation programs within the designated District boundaries. Over 200 Classes/programs are offered each year for public participation. Programs are conducted for all ages including infants through senior citizens. Grant funds provide for a large senior program including a congregate, home delivered meal nutrition program, and the Consolidated Transportation Service Agency (CTSA) which provides door to door transportation to Senior and Disabled population of Metropolitan Bakersfield.

In 1999 in agreement with the Kern Council of Governments NOR was contracted to operate Bakersfield's senior and disabled transportation program, Consolidated Transportation Service Agency (CTSA) a door-to-door service for older adults and persons with disabilities. Operation hours are Monday thru Friday from 7:00 am to 6:00 pm. The CTSA travels approximately 300,000 miles and transports up to 45,000 passengers annually.

The CTSA currently has 23 employees and operates a fleet consisting of 21 buses, in a variety of sizes from mini-vans, full sized raised-roof vans and small to medium size buses. To support its operations NOR maintains a separate facility for the CTSA program. The CTSA program is headquartered at 222 Minner Ave, Bakersfield, CA 93308 (661)392-2035. All of the vehicles and staff operate from this facility. The program services an area approximately 165 square miles, Greater Metropolitan Bakersfield and local unincorporated areas.

3. Language Assistance Goals

NOR/CTSA's goal is to provide meaningful access for LEP customers to CTSA's services, information and materials by developing a Language Assistance Plan and by regular evaluation of the developed methods and strategies.

4. Results of the Four Factor Analysis

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

NOR used available census data to determine the geographic boundaries of its services area and identify LEP populations within that area.

CTSA serves Census Tract 06029 Within this tract, the following areas fall under CTSA's service boundaries: Areas 3 & 7.

To identify the language spoken by individuals within this boundary, the available county subdivision data from the 2009 American Community Survey and United States Census 2010 was analyzed.

As demonstrated in Table 4-1 below, Spanish is the only language that falls outside of the Safe Harbor Provision of over 5% or 1,000 individuals (whichever is less). Based on population statistics and the current number of person available to use the CTSA services (7,119) 45.5% (3,239) could be of Hispanic origin of those 37.1% (1,202) could be identified as "Limited English Proficient", with 8.4% in the seniors over 65 range that number is 100.

Table 4-1

Bakersfield, County of Kern, State of California 2009 American Community Survey/2010 US Census		
Ability to Speak English	**Population**	**Percentage**
Total Population	*387,483*	*100.0%*
One Race	330,415	95.1%
Two or More Races	17,068	4.9%
Hispanic	158,104	45.5%
Language spoken other than English: Spanish	58,656	37.1%
Number of Seniors in this category	4,927	8.4%

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

CTSA Supervisor was contacted in early 2009 by a member of local county medical administration regarding use of a bi-lingual person to assist “LEP” persons, at that time no services existed. A subsequent decision was made to utilize a bi-lingual individual who was on staff to give CTSA this level of service in trip booking capacity and to translate on radio for drivers in the field needing communication assistance with “LEP” riders.

CTSA Staff Survey

CTSA is a small transportation program for seniors and persons with a permanent disability requiring door to door services. Of the 23 staff members, 5 drivers and 1 booking staff are bi-lingual and all marketing materials and information documents are printed in both English and Spanish. A survey of the frequency of use is ongoing. To date the frequency is limited to about 7 to 8 contacts a day for trip booking purposes by the primary bi-lingual contact.

LEP Outreach

In 2011 CTSA developed a services brochure, application and new rider information packet all in Spanish to assist clients whose primary language was Spanish. These pamphlets are made available during the annual “Resource Fairs” put on throughout the year by senior services and other organizations. They are also made available upon request by any person or agency. The local RTPA, Kern Council of Governments, outreach exhibits at the local county fair also provide this information.

While the response from LEP individuals was small, some new information was used and is reported below. Future LEP outreach efforts will include continuing to identifying key organizations or contacts in the community that serve LEPs and interviewing those individuals and their consumers. These contacts will be critical as CTSA works to improve the efficacy of its language assistance efforts.

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

CTSA understands that its services are used for life-sustaining activities, such as transportation to work, school, grocery shopping, non-emergency medical appointments, as well as life-enriching activities, such as school, beauty shops and socialization events. For transit-dependent individuals, CTSA services are gravely important. For this reason, CTSA is committed to translating vital documents relating to its service. Vital documents are those that demonstrate where and how to use CTSA services, how to access services and additional information, and information about CTSA's ADA services and Title VI program.

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

As the geographic area in which CTSA serves is confined to one city and all its unincorporated areas outreach will need to be varied and, at times, event specific. CTSA's Public Participation Plan lays out the types of outreach activities that will be undertake for the various levels of public events.

A large proportion of outreach will be possible through continuing to cultivate relationships with key contacts within the LEP populations. As identified in CTSA's Public Participation Plan, keeping these contacts informed of CTSA activities, services and events, and working with them to connect with the LEP populations will be an important outreach activity with little or no associated costs. As all brochures and pamphlets have been reproduced in house by our staff in Spanish there is little additional cost.

Safe Harbor Provision

Although prior to this plan's implementation CTSA was not aware of any specific requirements to have available assistance for LEP populations. Our experiences with our clients had made it clear there was a need for this assistance. We had put bi-lingual staffing in place with our trip booking/dispatch staff. Additionally all vital documents are translated in Spanish. Vital documents are those that demonstrate where and how to use CTSA services, how to access services and additional information, and information about CTSA's ADA services and Title VI program. All brochures and informational pamphlets have been reproduced in house by our staff as well as the Title VI Public Notice and Complaint Form.

5. Implementation Plan

Timeline/ Major Milestones

Table 5-1 below lists the major activities associated with this Plan and assigns each an anticipated to be started or completed. Activities that have been labeled with the "NOW" category are those that have already been completed or are currently in progress.

Table 5-1

Task 1: Identifying LEP Individuals Who Need Language Assistance

	ITEM	NOW	NEXT YEAR, Beginning 2019
1.1	Assess the LEP population in CTSA's service area • Four Factor Framework Analysis • Outreach to community groups serving LEP persons & focus groups/interviews with LEP individuals. • Interview/survey staff about previous experience with LEP individuals	**X**	
1.1	Identify areas within the service district and routes serving areas with high concentrations of LEP individuals.	**X**	

Task 2: Language Assistance Measures

Developing Assistance Procedures

	ITEM	NOW	NEXT YEAR, Beginning 2019
2.1	Develop a list of language assistance products and methods and how CTSA can access these.		X
2.2	Develop procedures for ***customer service staff*** regarding: • how to respond to LEP callers how to respond to correspondence from LEPs • how to respond to LEPs in person • how to document LEP needs • how to respond to civil rights complaints.	X	
2.3	Develop procedures for ***vehicle operators, station managers, and others*** who regularly interact with the public on how to respond to an LEP individual.	X	

Table 5-1, Continued

Task 2: Language Assistance Measures
Translating documents

	ITEM	NOW	NEXT YEAR, Beginning 2019
2.4	Develop a process for determining: • If a particular document needs to be translated, into which languages it should be translated.	**X**	
2.5	Translate vital documents, including: • CTSA brochures • CTSA policies • Service changes	X	

Task 2: Language Assistance Measures
Live Interpretation or Translation

	ITEM	NOW	NEXT YEAR, Beginning 2019
2.6	Develop a list of language assistance products and methods and how CTSA can access these.		X
2.7	Establish competency standards for interpreters and translators; including: • CTSA will determining the interpreter or translator's competency in English and the other language; CTSA will train the interpreter in specialized terms; • CTSA will instruct the interpreter or translator that he or she should not deviate into a role as counselor, legal advisor, or any other role aside from interpreting; • CTSA will ask the interpreter to attest that s/he does not have a conflict of interest on the issues that they would be providing interpretation services.	X	
2.8	Develop a CTSA policy that states that all interpretation and written translation must be performed by approved vendors/individuals whose competency has been established.		X

Table 5-1, Continued

Task 3: Training Staff

ITEM		NOW	NEXT YEAR, Beginning 2019
3.1	Identify which CTSA staff are likely to come into contact with LEP individuals	X	
3.2	Develop procedure/schedule for LEP training for identified CTSA staff, for new-hires, and continued training		X
3.3	Develop curriculum for and train frontline, customer service, and staff likely to interact (operators, etc) with LEPs in language assistance procedures identified in 2.1 and 2.2 and 2.3		X

Task 4: Providing Notice to LEP Persons

ITEM		NOW	NEXT YEAR, Beginning 2019
4.1	Inventory the existing public service announcements and community outreach CTSA currently performs.	X	
4.2	Incorporate notice of the availability of language assistance into existing outreach methods • Develop language regarding language assistance in multiple languages for posters/signage/notices • Develop non-English outreach materials: Place foreign-language ads in publications serving second language populations to share current significant, service-related announcements • Place a notice of right to language assistance, at no cost, on important outreach documents and on NOR's website.	X	
4.3	Create sign in multiple languages informing LEP clients about available language services and post		**X**
4.4	Undertake targeted community outreach to LEP populations. • Continue developing relationships with community leaders & LEP populations identified during Four Factor Analysis • Develop policy for when (what type of service changes/announcements) to conduct targeted community meetings for LEP populations	**X**	

Table 5-1, Continued

Task 5: Monitor and Update the Language Assistance Plan

ITEM		NOW	NEXT YEAR, Beginning 2019
5.1	Assign Day-to-day administration of LEP program, ensuring compliance and correct implementation.	**X**	
5.2	Develop a process for receiving feedback on language assistance measures • Add a question to any surveys to assess respondents' English proficiency and primary spoken language. • On-going dialogue with groups serving LEP populations • Review demographics changes reported by ACS and Census data	**X**	
5.3	Conduct internal monitoring regarding language assistance measures • Routinely survey/interview CTSA staff about interaction with LEPs and their ability to successfully interact	X	
5.4	Make changes to the language assistance plan based on feedback received	X	
5.5	Consider new language assistance needs when expanding service • Identify service changes affecting areas with high concentrations of LEP individuals and develop mitigation strategies	X	

Responsibility for Implementing the Language Assistance Plan

The Title VI Program Administrator will be responsible for overseeing the implementation of this plan and assigning tasks as appropriate.

NOR/CTSA's Title VI Program Administrator is:

Joe West,
Transportation Supervisor
NOR/CTSA
3825 Riverlakes Dr
Bakersfield, CA 93312
(661) 392-2000
Email: jwest@norrecreation.org

Language Service Provision

Interpretation Services

1. CTSA currently has no contract with Language Line Personal Interpreter to provide simultaneous interpretation for callers and for customers in service center with whom staff can't communicate. This is identified as an area for improvement (table 5.1 task2 section 2.6). What follows is an example of how this would function.
Language Line Instructions:

- To connect to an interpreter, dial **1 888 808-9008**.
  or **+1 831 242-8841** if calling from outside of North America.
- At the prompt, enter your 8-digit PIN number: **74674457**.
- Speak the name of the desired language. (e.g. Spanish)
- If the language you requested is correct, press 1.
- You'll be asked if you need us dial a third party for you (either international or domestic). If you do, you'll be connected to an attendant who will ask for the phone number, and will dial it for you. If not, you'll be directly connected to an interpreter.
- Once the interpreter is connected. Tell him/her what you want to accomplish and give them any special instructions.

2. When a customer directly calls the Language Line phone number, Language Line will connect with CTSA and translate the callers and CTSA's conversation.

3. When a customer calls CTSA directly and with whom a staff member can't communicate, staff will connect with Language Line to translate. This step will be followed for customers at NOR/CTSAs headquarters and other service centers. If there isn't a staff member available who can translate, Language Line services would be used.

4. Simultaneous interpretation at public events will be determined on a case-by-case basis by examining several factors, such as:

- the type and size of event;
- the availability of a CTSA staff member to interpret;
- the availability of a staff member of a host organization to interpret, etc.

For small outreach events, such as level one type activities, proactive outreach, smaller travel training and transit awareness events, bilingual staff members will assist with translation where appropriate and feasible. For level two public outreach events, where it is appropriate and necessary to do so, CTSA will hire an interpreter through a local or regional service.

Translation of Vital Documents

1. Based on the results of the four factor analysis, the following vital documents will be translated into Spanish, the LEP language within CTSA's service area, in accordance with the timeline established in the previous pages:

Vital Documents – Stage 1

1) Title VI Program
- Title VI Notice to the Public
- Complaint Form
- Complaint Procedures

2) CTSA Rider Information (**these documents have been translated and are available**)
- Rider Guide
- Service Brochure
- ADA Application

Vital Documents – Stage 2

1) Signage advertising CTSA's language assistance program, particularly Language Line number and translated information on its website

2) System Map, where practical

2. Going forward, the extent of CTSA's ability and obligation to translate written documents will be determined on a case-by-case basis, by looking at all elements presented in the Four Factor Analysis

NOR's Website

1. All translated vital documents will be posted on NOR's website on their respective pages.

2. NOR/CTSA is reviewing options and will pursue the most appropriate and feasible option for translating its website. Elements included in the Four Factor Analysis will be used in recommending a best course.

Options include:

- installing the website translator gadget powered by Google Translate or similar gadgets on NOR's homepage *[low to no cost]*

- translating only vital information such as Fares & General Information (http://www.norfun.org/fares.html); Contact Us (http://www.norfun.org/svc.html); ADA Service page (http://www.norfun.org/ADA.html) *[mid-range cost]*
- professional translation of each webpage *[high cost]*

Outreach

1. To ensure that LEP individuals are aware of CTSA's language assistance measures NOR/CTSA will develop simple signage that advertise
    - CTSA's Language Line number offering free-of-charge interpretation services
    - Information is available in other language on the website.

2. Language assistance signage is posted at the following locations:
    - CTSA Operations Center
    - CTSA vehicles
    - NOR Community centers and/or popular destinations identified during the Four Factor Analysis and ongoing outreach

3. CTSA staff will work with NOR/CTSA ambassadors to assist in educating, educate consumers about CTSA's language assistance programs during their outreach and transit orientation activities.

4. NOR/CTSA outreach staff and ambassadors will continue developing relationships with organizations that serve LEP individuals and developing strategies to spread awareness of CTSA's language assistance services.

6. Monitoring, Evaluating, and Updating the LAP

1. A thorough review of this Language Assistance Plan will be undertaken every three years concurrent with updating and submitting the NOR/CTSA Title VI Program. At that time, the LEP population will be reassessed, to ensure all significant LEP languages are included in CTSA's language assistance efforts. The following reoccurring reporting and evaluation measures will be used to update the Language Assistance Plan:

2. CTSA will regularly assess the effectiveness of how CTSA communicates with LEP individuals by:

- Including questions about language assistance and information needs on any community surveys
- Conversations with key contacts that work with LEPs
- Ad-hoc outreach with LEP groups

3. CTSA will track its language assistance efforts, including:

- Reporting front-line staff's interactions with LEP
- Language Line reports

7. Staff Training

CTSA's Title VI Program Administrator has developed training guidelines for CTSA staff which includes the following:

- How to respond to LEP callers
- How to respond to correspondence from LEPs
- How to respond to LEPs in person
- How to document LEP needs
- How to respond to civil rights complaints.

The Program Administrator will also develop a schedule for reoccurring training and a process for training new hires, as well as training opportunities for CTSA's ambassadors.

Table Depicting the Membership of Non-Elected Committees and Councils

CTSA does not have any non-elected committees or councils.

Description of Sub-recipient Monitoring and Schedule of Sub-recipient Title VI Program Submissions

CTSA does not have any sub-recipients at this time and does not anticipate expanding to include sub recipients. In the case that CTSA does expand and begin contracting with sub-recipients, CTSA will revisit this issue to ensure compliance.

Title VI Equity Analysis

No Transit or Transportation facilities have been undertaken since 1997. Therefore NOR/CTSA did not conduct an equity analysis. Our only Transportation facility is ADA and Title VI compliant.

Board of Directors Approval of NOR/CTSA's Title VI Program

THE BOARD OF DIRECTORS

OF THE

NORTH OF THE RIVER RECREATION AND PARK DISTRICT

IN THE MATTER OF:

RESOLUTION OF THE BOARD OF DIRECTORS AUTHORIZING THE TITLE VI COMPLIANCE PLAN FOR NORTH OF THE RIVER RECREATION AND PARK DISTRICT/CTSA

I, Elaine Bush, Clerk of the Board of Directors of the North of the River Recreation and Park District, of the County of Kern, State of California, do hereby certify that the following resolution proposed by Director Roberson and seconded by Director Eckroth was duly passed and adopted by said Board of Directors at an official meeting thereof this 19th day of May 2014 by the following vote to wit:

AYES: Ruettgers, Roberson, Eckroth

NOES: None

ABSENT: Patteson, Martin

ABSTAIN: None

Elaine Bush

Clerk of the Board of Directors of the North of the River Recreation and Park District

---

RESOLUTION #11-14

WHEREAS, North of the River Recreation and Park District desires to comply with Title VI of the Civil Rights Act of 1964, including new provisions detailed in U.S. Department of Transportation's FTA Circular 4702.1B, "Title VI Requirement and Guidelines for Federal Transit Administration Recipients".

NOW, THEREFORE, IT BE RESOLVED, by the Board of Directors of North of the River Recreation and Park District as follows:

1. The General Manager is authorized to implement components of the plan in order to meet federal requirements.

2. The General Manager is authorized to implement policies that may be necessary to comply with subsequent revisions or interpretations to the Civil Rights Act.

** A new board resolution is pending. Resolution #45-18 adopted by Board September 17th 2018