

Morongo Basin Transit Authority's TITLE VI PROGRAM

**Developed: June 2013
Adopted by the MBTA Board of Directors:
June 27, 2013**



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This document was prepared by Morongo Basin Transit Authority (MBTA) 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."

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MBTA's Title VI Notice to the Public

Notifying the Public of Rights under Title VI



Morongo Basin Transit Authority 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.

- MBTA provides services and operates programs without regard to race, color, and national origin in full compliance with Title VI.
- Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI while using MBTA services may file a complaint with MBTA. All complaints will be fairly and objectively investigated.
- To file a complaint, you may contact our Title VI Program Administrator, Mark Goodale at (760) 366-2986; or by email: mark@MBTAbus.com; or visit MBTA's headquarters at 62405 Verbena Road Joshua Tree, CA 92252.
- For more information about MBTA's Title VI program and complaint procedure, contact (760) 366-2395; or visit MBTA's website: <http://www.mbtabus.com/titlevi/index.html>
- 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
- If information is needed in another language, contact (888) 808-9008, PIN 74674457
- Si se necessita información en español, llame (888) 808-9008, PIN 74674457.

List of Locations Where Title VI Notice Is Posted

MBTA's Title VI notice to the public is currently posted at the following locations:

Location Name	Address	City
MBTA Main Office	62405 Verbena Rd	Joshua Tree
Yucca Valley Transit Center	57430 Yucca Trail	Yucca Valley
29 Palms Transit Center	6575 Adobe Rd	Twentynine Palms
Revenue Service Vehicles		
Schedule- Riders Guide		
Website:	mbtabus.com/titlevi	

The Title VI notice and program information is also provided on MBTA's website at:
<http://www.mbtabus.com/titlevi/index.html>

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 Morongo Basin Transit Authority may file a Title VI complaint by completing and submitting MBTA's Title VI Complaint Form. MBTA investigates complaints received no more than 180 days after the alleged incident. The Authority 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 MBTA Title VI Program Administrator Mark Goodale 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, MBTA may contact the complainant. The complainant has 10 business days from the date of the letter to send requested information to Mr. Goodale, Title VI Administrator investigator. If the investigator is not contacted by the complainant or does not receive the additional information within 10 business days, MBTA 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 MBTA's closure letter or the LOF to appeal to the MBTA 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

Morongo Basin Transit Authority Title VI Complaint Form

Section I: Please write legibly		
1. Name:		
2. Address:		
3. Telephone:		3.a. Secondary Phone (<i>Optional</i>):
4. Email Address:		
5. Accessible Format Requirements?	<input type="checkbox"/> Large Print	<input type="checkbox"/> Audio Tape
	<input type="checkbox"/> TDD	<input type="checkbox"/> Other
Section II:		
6. Are you filing this complaint on your own behalf?		YES* NO
*If you answered "yes" to #6, go to Section III.		
7. If you answered "no" to #6, what is the name of the person for whom you are filing this complaint? Name:		
8. What is your relationship with this individual:		
9. Please explain why you have filed for a third party:		
10. Please confirm that you have obtained permission of the aggrieved party to file on their behalf.		YES NO
Section III:		
11. I believe the discrimination I experienced was based on (<i>check all that apply</i>): <input type="checkbox"/> Race <input type="checkbox"/> Color <input type="checkbox"/> National Origin		
12. Date of alleged discrimination: (<i>mm/dd/yyyy</i>)		
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.		

Morongo Basin Transit Authority Title VI Complaint Form, Page 2

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

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

Signature and date are required below to complete form:

Signature _____ Date _____

Please submit this form in person or mail this form to the address below:

MBTA Title VI Program Administrator
 62405 Verbena Road
 Joshua Tree, CA 92252

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

MBTA has not been involved in any transit-related Title VI investigations, complaints, or lawsuits.

Morongo Basin Transit Authority's Public Participation Plan

Developed: March 2013



**Joe Meer, General Manager
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62405 Verbena Road
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1. Introduction

Purposes of This Plan

As part of its Title VI Program, Morongo Basin Transit Authority (MBTA) is bolstering its public participation processes. MBTA is also enhancing its strategies for engaging minority and Limited English Proficient individuals. This plan provides guidelines for involving the public in MBTA planning efforts to ensure that all groups are represented and their needs considered.

MBTA is committed to ensuring it serves the Morongo Basin 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, MBTA will be able to assess the quality of its service, measure potential impacts to the community from MBTA initiatives or proposed initiatives, and ensure that it is providing valuable services to the residents and visitors of the Morongo Basin.

2. Public Participation Process

Approach to Public Participation

The public participation process should be considered at the earliest stages of any MBTA 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.

MBTA 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 MBTA staff deems appropriate.

The levels are as follows:

Level One: Routine service, route and any short-term projects whose impact on MBTA'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 MBTA'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 Morongo Basin 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 MBTA'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 MBTA headquarters, on buses and at bus shelters as is appropriate, at key community centers with whom MBTA has a relationship.
- Information about public participation opportunities will also be posted on MBTA's website at least two weeks prior to the event.
- Comments will be accepted via the MBTA 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 MBTA's website will be posted in English and Spanish.
- MBTA 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, MBTA has contracted with Language Line 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 will be provided by MBTA staff as is possible. When it is appropriate or necessary, MBTA will insure non-English language interpretation in additional language (and in Spanish if required) is available.

Currently, Spanish is the only quantifiable population within MBTA's service area that is limited English proficient. MBTA 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, MBTA will review this plan and its strategies to engaging with non-English speaking populations.

Level Two

These are longer term projects whose impact on MBTA'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

special outreach to ensure they have access to information and the opportunity to make comments regardless of race, religion, age, income, color, national origin, or disability.

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 central locations close to a bus stop. 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.

- MBTA 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 MBTA hosted public events.
- MBTA will ensure that non-English language interpretation will be available at any public meeting or workshop as is appropriate and necessary,

Summary of Outreach Efforts Made Since 2009 Title VI Submission

MBTA's Lead Dispatcher regularly participates in reoccurring and ad hoc outreach.

Reoccurring outreach locations often include:

- **Senior Centers and Yucca Mesa Community Center**– Once per year or as in invited. Morongo Basin Senior Centers also have MBTA's information and regularly advertise to their consumers.
- **Twentynine Palms and Yucca Valley High Schools** – Twice per year, the Dispatch Supervisor will present to classes. These programs are not open to the public as they occur on public school property.
- **The Marine Corps Air Ground Combat Center (MCAGCC), or Twentynine Palms Base** – Quarterly, or as allowed by Command leaders, the Lead Dispatcher and/or the MBTA General Manager visit the base to educate newly stationed trainees about available transportation options, including MBTA's services or MBTA registered cabs if there elect to use taxi services. MBTA information is also available in all the barrack as well as in the Community Service Office. Additional marketing strategies include advertising in the *Observation Post*, the Base's newspaper, and creating a dedicated "Marines" page on the MBTA website

Ad hoc outreach conducted since 2009 includes:

- **Route or fare** changes – For any route or fare changes, MBTA hosts workshops at community centers.
- **SANBAG (San Bernardino Associated Governments) Annual Transit Unmet Needs Process** – SANBAG (the council of governments and transportation planning agency for San Bernardino County) is required by state statute to conduct a formal hearing process that solicits information about transit needs. This allows the county transportation commission, SANBAG, to make a determination as to whether these 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 still allocated only in part to public transportation.

Over the last three unmet transit needs cycles hearings were conducted for the Lower Desert Region in Twentynine Palms and Joshua Tree. The process involves inviting testimony through a wide array of mailing lists and agency contacts, including MBTA's outreach lists, receiving that testimony either in-person at the hearing, by surface mail or by email where a name and local address are provided. Dozens of comments are received in each cycle. MBTA's comments and complaints collected over the year as also reviewed as a part of this process.

- **2011 Update to the Public Transit – Human Services Transportation Coordination Plan for San Bernardino County** – As part of its Coordinated Plan Update process, SANBAG held six community transit workshops were held across San Bernardino County. A workshop for the communities of the Morongo Basin was held at the Morongo Basin Transit Authority's Operations Center in Joshua Tree on February 11, 2011. 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.

Morongo Basin Transit Authority's Language Assistance Plan

Developed: June 2013



**Joe Meer, General Manager
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Joshua Tree, CA 92252**

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1. Introduction

This Language Assistance Plan was developed during the process of preparing MBTA's Title VI Program to ensure that MBTA 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.

MBTA's Title VI Program was prepared in the spring of 2013 in accordance with FTA Circular 4702.1B, Title VI Requirements and Guidelines for Federal Transit Administration Recipients, October 1, 2012.

MBTA's Title VI Program Administrator is:

Mark Goodale, Operations Manager

MBTA

62405 Verbena Rd.

Joshua Tree, CA 92252.

(760) 366-2986

Email: mark@mptabus.com

More information about MBTA's Title VI Program is available at:

<http://www.mptabus.com/titlevi/index.html>

2. Overview of MBTA's Service Area and Services

The Morongo Basin is located approximately 30 minutes east of the Palm Springs Area. A joint powers authority, the MBTA operates in 10 communities with a service population of 108,000 (service population does not include Palm Springs Area).

During the week nine (9) deviated-fixed routes are in operation. In addition, five (5) demand response vehicles circulate in the communities offering door-to-door service for older adults and persons with disabilities. Operation hours during the week extend from 6:00 am to 10:00 pm, with limited weekend service provided. MBTA's operates approximately 700,000 miles and carries 360,000 passengers annually.

MBTA currently has 36 employees and operates a fleet consisting of 24 buses, all of which operate on compressed natural gas. The agency operates two compressed natural gas (CNG) stations in Joshua Tree and Twentynine Palms to support its operations and has just completed building an intermodal Transportation Center in Twentynine Palms, augmenting the existing Transportation Center in the town of Yucca Valley.

MBTA is headquartered at its Joshua Tree Operations Center on 62405 Verbena Road, Joshua Tree, CA 92252. Some of the MBTA's vehicles are operated out of a satellite facility at the Twentynine Palms City Yard.

3. Language Assistance Goals

MBTA's goal is to provide meaningful access for LEP customers to MBTA'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.

MBTA used available census data to determine the geographic boundaries of its services area and identify LEP populations within that area.

MBTA serves Census Tract 06071 Within this tract, the following areas fall under MBTA’s service boundaries: Areas 14, 15, 20 & 21.

To identify the language spoken by individuals within this boundary, the available county subdivision data from the 2009 American Community Survey 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).

“Asian” is the next highest LEP language comprising 2.1% of the area’s population that speaks English less than “Very Well.” Informed by previous experience, past community and staff surveys and anecdotal evidence, MBTA determined that Tagalog is the most common Asian language in its service language. While MBTA will not immediately translate vital documents into Tagalog or other Asian languages, as this percentage is below the Safe Harbor Provision, it will continue to monitor the proportions of LEP individuals and corresponding languages as detailed in Section 6 in the following pages.

Table 4-1

Twentynine Palms - Morongo Valley County SubDivision 2009 American Community Survey		
Ability to Speak English	Population	Percentage
<i>Total Population</i>	<i>70,304</i>	<i>100.0%</i>
English	61,203	87.1%
Language other than English	9,101	12.9%
Speaks English less than "Very Well"	2,116	3.0%
Spanish	6,156	8.8%
Asian	1,490	2.1%
All Others	1,455	2.0%

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

MBTA used several strategies to complete Factor 2 and Factor 3 analyses, including proactive outreach and surveying MBTA staff.

MBTA Staff Survey

Of the 18 responses to a staff questionnaire regarding past experience with LEP's, 6 (33%) reported that they **never come into contact into individuals who are non-English speaking or Limited English Proficient.**

Seven respondents (39%) indicated that they **come into contact with LEP's rarely or infrequently.**

The remaining 5 (28%) responses were able to identify how often they interact with LEPs

- 2 responses – once a day
- 2 responses – 2-4 times a week
- 1 response – twice a month

One response indicated interacting with LEPs infrequently, but via phone calls.

The full results of this survey are available in Appendix A.

LEP Outreach

MBTA made numerous attempts at conducting proactive outreach efforts to connect with LEP individuals. MBTA worked with two churches with Spanish-speaking populations to arrange an outreach event following their Spanish-language Mass. However, these events were cancelled at the last minute by the churches' staff.

MBTA did successfully conduct outreach at a local strip mall and carnicería located in Yucca Valley. A survey was developed that asked individuals about the areas of concern of the four factor analysis. This survey was available in English and Spanish. Over a two-day period (Saturday and Sunday), MBTA staff, including Spanish speakers attempted to survey individuals outside the market.

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 MBTA works to improve the efficacy of its language assistance efforts. Additional LEP outreach will be conducted in partnership with the School District when school resumes in the fall. MBTA has identified school in the district with the highest concentrations of students that are English Learners and will work with the administration of these schools to plan an event where MBTA can talk with parents. This English Learner data is available in Appendix B.

Results of LEP Outreach Activity (as it relates to frequency of use)

During a two-day intercept survey activity, only four responses were completed by LEP individuals. While this is a very small number, these responses begin to flesh out what MBTA knows about the LEP individuals in its services area and their use, or lack of, of MBTA services.

All four respondents ride MBTA buses 1 to 3 times per week.

These individuals are using multiple routes, including:

- Ready Ride, MBTA's paratransit service;
- Route 1 (Yucca Valley to the Marine Base)
- Route 3A (Twentynine Palms to the Marine Base)
- Route 7B (Yucca Valley)
- Route 12 (Marine Base to Palm Springs in neighboring Riverside County. This route stops in Twentynine Palms, Joshua Tree and Yucca Valley)

Based on the data currently available, LEPs are not accessing MBTA's services daily, but one or more times per week. As MBTA now has some information about which routes LEP individuals are using, it can begin targeting Spanish-language information to assist these individuals in better and more frequently using this service and reach individuals in their communities who may not yet be riders.

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

MBTA understands that its services are used to 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, and social events. For transit-dependent individuals, MBTA services are gravely important. For this reason, MBTA is committed to translating vital documents relating to its service. Vital documents are those that demonstrate where and how to use MBTA services, how to access services and additional information, and information about MBTA's ADA services and Title VI program. The implementation for translating these vital documents is detailed below in Section 5.

Results of LEP Outreach Activity (as it relates to importance of services)

To help gauge how important MBTA services are to the LEP individuals it serves, survey respondents were asked about their driving habits.

All four LEP respondents answered that they "sometimes have access to a vehicle," demonstrating that public transit may often be a service they depend on to get where they need to go.

Respondents were also asked to where they are traveling when they ride MBTA buses. The following destinations were reported:

Destination	# of Responses
Medical Appointment	3
Grocery Shopping	3
Work	1
School	1

"Social activity" and "other" were available responses; yet these boxes were not checked by the LEP respondents. As with the other questions, these responses are small, but the information is telling: LEP individuals are using MBTA services for life-sustaining purposes.

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 MBTA serves is vast, outreach will need to be varied and, at times, event specific. MBTA's Public Participation Plan lays out the types of outreach activities that will be undertaken 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 MBTA's Public Participation Plan, keeping these contacts informed of MBTA 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.

Table 4-2, below, identifies several potential outreach strategies that may be utilized as is appropriate and their associated costs.

Some of these strategies, such as Spanish language advertisements on radio stations and in magazines will be utilized if such outlets are identified and as funding is available.

Table 4-2

MBTA TITLE VI PROGRAM FOUR FACTOR ANALYSIS: FACTOR 4

Translation of Written Documents		Interpretation & Translation Services		Advertisements & Outreach	
Specific elements	Unit Costs (range)	Specific elements	Unit Costs	Specific elements	Unit Costs
<i>Vital Documents:</i>		Language Line	TBD	Availability of language assistance poster development and printing	TBD
Title VI Notice to the Public	\$80-\$100	Simultaneous interpreter for level two public events	TBD	Spanish-language radio spots (optional)	TBD
Complaint Form	\$80-\$100			Adverts in Spanish-language publications (optional)	To be determined an a case by case basis
Complaint Procedures	\$80-\$100				
Rider Guide	\$80-\$100				
ADA Application	\$80-\$100				
Signage advertising MBTA's language assistance program	\$80-\$100				
System Map	\$80-\$100				
Individual route schedules where practical	\$80-\$100				
<i>Ad-hoc Documents:</i>					
Fliers/advertisements for level one public events	\$80-\$100				
<i>MBTA Website</i>	Translation approach TBD				

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 7/1
1.1	Assess the LEP population in MBTA’s service area <ul style="list-style-type: none"> • Four Factor Framework Analysis • Outreach to community groups serving LEP persons & focus groups/interviews with LEP individuals. • Interview/survey MBTA 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 7/1
2.1	Develop a list of language assistance products and methods and how MBTA can access these.	X	
2.2	Develop procedures for customer service staff regarding: <ul style="list-style-type: none"> • 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 7/1
2.4	Develop a process for determining: <ul style="list-style-type: none"> • If a particular document needs to be translated • into which languages it should be translated. 	X	
2.5	Translate vital documents, including: <ul style="list-style-type: none"> • MBTA brochures • MBTA policies • Service changes • signage that communicates hazardous pedestrian access in areas of high LEP concentration • signage that indicates prohibited behavior in areas of high LEP concentration 		X

Task 2: Language Assistance Measures
Live Interpretation or Translation

ITEM		NOW	NEXT YEAR, Beginning 7/1
2.6	Develop a list of language assistance products and methods and how MBTA can access these.	X	
2.7	Establish competency standards for interpreters and translators; including: <ul style="list-style-type: none"> • MBTA will determine the interpreter or translator's competency in English and the other language; MBTA will train the interpreter in specialized terms; • MBTA 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; • MBTA 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 MBTA 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 7/1
3.1	Identify which MBTA staff are likely to come into contact with LEP individuals	X	
3.2	Develop procedure/schedule for LEP training for identified MBTA 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 7/1
4.1	Inventory the existing public service announcements and community outreach MBTA currently performs.	X	
4.2	Incorporate notice of the availability of language assistance into existing outreach methods <ul style="list-style-type: none"> • 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 MBTA's website. • Provide key transit information and online Trip Planner in Spanish (and Tagalog?) on MBTA'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. <ul style="list-style-type: none"> • 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 7/1
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 <ul style="list-style-type: none"> • 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 <ul style="list-style-type: none"> • Routinely survey/interview MBTA 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 <ul style="list-style-type: none"> • 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.

MBTA's Title VI Program Administrator is:

Mark Goodale, Operations Manager

MBTA

62405 Verbena Rd.

Joshua Tree, CA 92252.

(760) 366-2396

Email: mark@mbtabus.com

Language Service Provision

Interpretation Services

1. MBTA has a contract with Language Line Personal Interpreter to provide simultaneous interpretation for callers and for customers in service centers with whom staff can't communicate.

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 MBTA and translate the callers and MBTA's conversation.

3. When a customer calls MBTA 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 MBTA's headquarters and other service centers. If there isn't a staff member available who can translate, Language Line services will 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 MBTA 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, MBTA 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 MBTA'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) MBTA Rider Information
 - Rider Guide
- 3) ADA Application

Vital Documents – Stage 2

- 1) Signage advertising MBTA's language assistance program, particularly Language Line number and translated information on its website
- 2) System Map, where practical
- 3) Individual route schedules, where practical

2. Going forward, the extent of MBTA'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

MBTA's Website

1. All translated vital documents will be posted on MBTA's website on their respective pages.
2. MBTA 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 MBTA's homepage *[no to low cost]*

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

Outreach

1. To ensure that LEP individuals are aware of MBTA's language assistance measures MBTA will develop simple signage that advertise

- MBTA'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:

- Transit Centers and kiosks
- MBTA lobby
- Selected bus shelters
- MBTA vehicles
- Community centers and/or popular destinations identified during the Four Factor Analysis and ongoing outreach

3. MBTA staff will work with MBTA ambassadors to assist in educating, educate consumers about MBTA's language assistance programs during their outreach and transit orientation activities.

4. MBTA outreach staff and ambassadors will continue developing relationships with organizations that serve LEP individuals and developing strategies to spread awareness of MBTA'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 MBTA Title VI Program. At that time, the LEP population will be reassessed, to ensure all significant LEP languages are included in MBTA's language assistance efforts. The following reoccurring reporting and evaluation measures will be used to update the Language Assistance Plan:

2. MBTA will regularly assess the effectiveness of how MBTA 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. MBTA will track its language assistance efforts, including:

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

7. Staff Training

MBTA's Title VI Program Administrator has developed training guidelines for MBTA staff with training being conducted through 2014 or until all pertinent staff has received. This training will include 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 MBTA's ambassadors.

8. Appendices

Appendix A: Four Factor Analysis—Step 1: MBTA Staff Survey

To begin qualifying MBTA's previous experience with LEP individuals, all MBTA employees were asked to fill out a questionnaire relating to their interactions with limited English speaking individuals. Eighteen (18) staff members completed the questionnaire.

The questionnaire included the following questions:

1. While performing work functions, have you ever come into contact with individuals who are non-English speaking or Limited English Proficient?
2. How frequently do you come into contact with Limited English Proficient individuals?
3. Can you identify which language(s) these individuals speak?
4. What questions about MBTA did they ask?
5. Were you able to successfully communicate with individuals who are Limited English Proficient?

Interaction with LEPs:

Of the 18 responses, 6 reported that they **never** come into contact into individuals who are **non-English speaking or Limited English Proficient**.

7 responses indicated that they **come into contact with LEP's rarely or infrequently**.

The remaining 5 responses were able to identify how often they interact with LEPs

- 2 responses – once a day
- 2 responses – 2-4 times a week
- 1 response – twice a month

One response indicated interacting with LEPs infrequently, but via phone calls.

Languages Spoken:

The following languages were identified by the 12 responses that reported some (even if infrequent) interaction with LEPs:

Table 8-1

Language	Number of Times Reported
Spanish	9
German	1
Korean	1
Philippines (Tagalog)	1
Sign Language	1
Taiwanese	1

Questions Asked about MBTA:

The following topics were reported as asked by LEPs:

Table 8-2

Topic	Number of Times Reported
Schedule	6
Routes	4
Palm Springs	2
Specific bus stops	2
Destinations accessible by MBTA routes	1
Fares	1
Route 1	1

Communication with LEPs:

Staff members reported communicating successfully with LEPs in the following ways:

Table 8-3

Method of Communication	Number of Times Reported
Spanish speaker on board bus helped	2
Child/children of passengers speak English	1
Notepad for communicating with deaf passengers	1
Staff member speaks Spanish	1

Appendix B: Morongo Valley Unified School District English Learner Data

In order to better identify the LEP populations within MBTA's service area, and to begin tracking changes in those groups, MBTA reviewed English Learner statistics for students in the Morongo Unified School District. Public schools within the California Department of Education (CDE) must report on their students that are English Learners—students whose native tongue is a language other than English, and what language is their mother tongue. This data is available online via CDE's DataQuest website, <http://dq.cde.ca.gov/dataquest/>

MBTA accessed EL data to gather a fuller picture of the communities it services, including what LEP populations exists and where these groups may be concentrated. Periodically reviewing this data will enable MBTA to track what non-English languages other than Spanish are growing in order to provide appropriate language assistance services.

Consistent with data from the 2010 census (reported on in Section 4), the majority of English learner students in the Morongo Unified School District speak Spanish. The next largest non-English speaking groups are Filipino (Pilipino or Tagalog) and Vietnamese. While Filipino and Tagalog due not meet the Safe Harbor Provision, it will be important for MBTA to continue tracking growth within this group and be prepared to offer oral interpretation services as needed.

English Learner data by language is available on the following page in Table 8-4.

Table 8-4

Morongo Unified School District English Learner (EL) Students by School[1]

School	Breakdown of EL Students by non-English Language																	
	Total EL Students	Spanish	Filipino (Pilipino or Tagalog)	Thai	Vietnamese	German	Other	Japanese	Arabic	Punjabi	Cantonese	Tongan	Samoan	Korean	Gujarati	Mandarin	Khmer (Cambodian)	Dutch
Yucca Valley Elementary	67	65								1	1							
Condor Elementary	40	26	6	2	2	2	2	1										1
Yucca Valley High	34	33		1														
La Contenta Middle School	33	32								1								
Onaga Elementary	32	22			2			2	1	1					2	1		
Palm Vista Elementary	26	23	1		1	1		1										
Oasis Elementary	26	13	3		7		1	1								1		
Morongo Valley Elementary	24	24																
Twentynine Palms High School	18	13	2		2								1					
Twentynine Palms Elementary	18	31	3		1			1			2			1				
Joshua Tree Elementary	16	15		1														
Yucca Mesa Elementary	15	12		1					1			1						
Friendly Hills Elementary	14	9	1		1		2	4										1
Landers Elementary	12	12																
Twentynine Palms Junior High	9	6	1		1			1										
Hope Academy Charter	5	5																
Black Rock Alternative Continuation	4	4																
TOTALS PER LANGUAGE		345	17	5	17	2	5	11	2	3	3	1	1	1	2	2	1	1

Notes:

[1] California Department of Education Data Quest. <http://dq.cde.ca.gov/dataquest/>. Accessed 6/5/2013

Updated:

Table Depicting the Membership of Non-Elected Committees and Councils

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

Description of Subrecipient Monitoring and Schedule of Subrecipient Title VI Program Submissions

MBTA does not have any subrecipients at this time and does not anticipate expanding to include subrecipient. In the case that MBTA does expand and begin contracting with subrecipients, MBTA will revisit this issue to ensure.

Title VI Equity Analysis

Since the original 2009 Title VI submission, MBTA has undertaken only one construction project at the existing MBTA headquarters (not a new location) and, therefore, did not conduct an equity analysis.

Board of Directors Approval of MBTA's Title VI Program

MORONGO BASIN TRANSIT AUTHORITY

RESOLUTION 13-03

A RESOLUTION OF THE BOARD OF DIRECTORS OF THE MORONGO BASIN TRANSIT AUTHORITY OF SAN BERNARDINO COUNTY AUTHORIZING THE TITLE VI COMPLIANCE PLAN FOR THE AGENCY.

WHEREAS, the agency 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."

WHEREAS, the Board wishes to authorize approval of the Compliance Plan Developed by staff to comply with necessary provisions of the Civil Rights Act.

NOW, THEREFORE BE IT RESOLVED, by the Board of Directors of the Morongo Basin Transit Authority 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

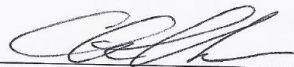
PASSED AND ADOPTED by the Board of Directors of the Morongo Basin Transit Authority in San Bernardino County, State of California, on this 27th Day of June, 2013



Chairman of the Board

I HEREBY CERTIFY that the foregoing resolution was duly passed and adopted by the Board of Directors of the Morongo Basin Transit Authority at a regular meeting thereof, held on the 27th day of June 2013.

AYES:
NAYS:
ABSENT:



Assistant Secretary

Additional Information for Transit Providers that operate less than 50 fixed route vehicles in peak service and are not located in an Urbanized Area (UZA) of 200,000: System-Wide Policies and Service Standards

Effective Practices to Fulfill the Service Standard Requirement

Vehicle Load Standards

The average of all loads during the peak operating period should not exceed the following load factors for that service type:

Intercity Bus: Loads not to exceed 1.0 passenger / seat

Local Services: Loads not to exceed 1.25 passengers / seat

Vehicle Headway Standards

Peak period headways on Local Lines 3 A/B and Line 7 A/B, and on Intercity Line 1 will be 60 minutes, Monday through Friday. MBTA will explore the possibility of instituting 30-minute headways or better depending on the availability of funding.

Local Line 21 and Intercity Lines 12 and 15 operate at longer headways, based on the long distances traversed, ridership, demand and transfer opportunities at the terminus of these lines.

On-Time Performance Standards

Fixed Route [Local and Intercity]:

- The agency endeavors to operate with no early departures before the time shown in the schedule brochure.
- 90 percent of all trips should be operated "on-time," defined as departing a published time-point no more than ten (10) minutes later than the published scheduled to accommodate the deviation pick-ups.

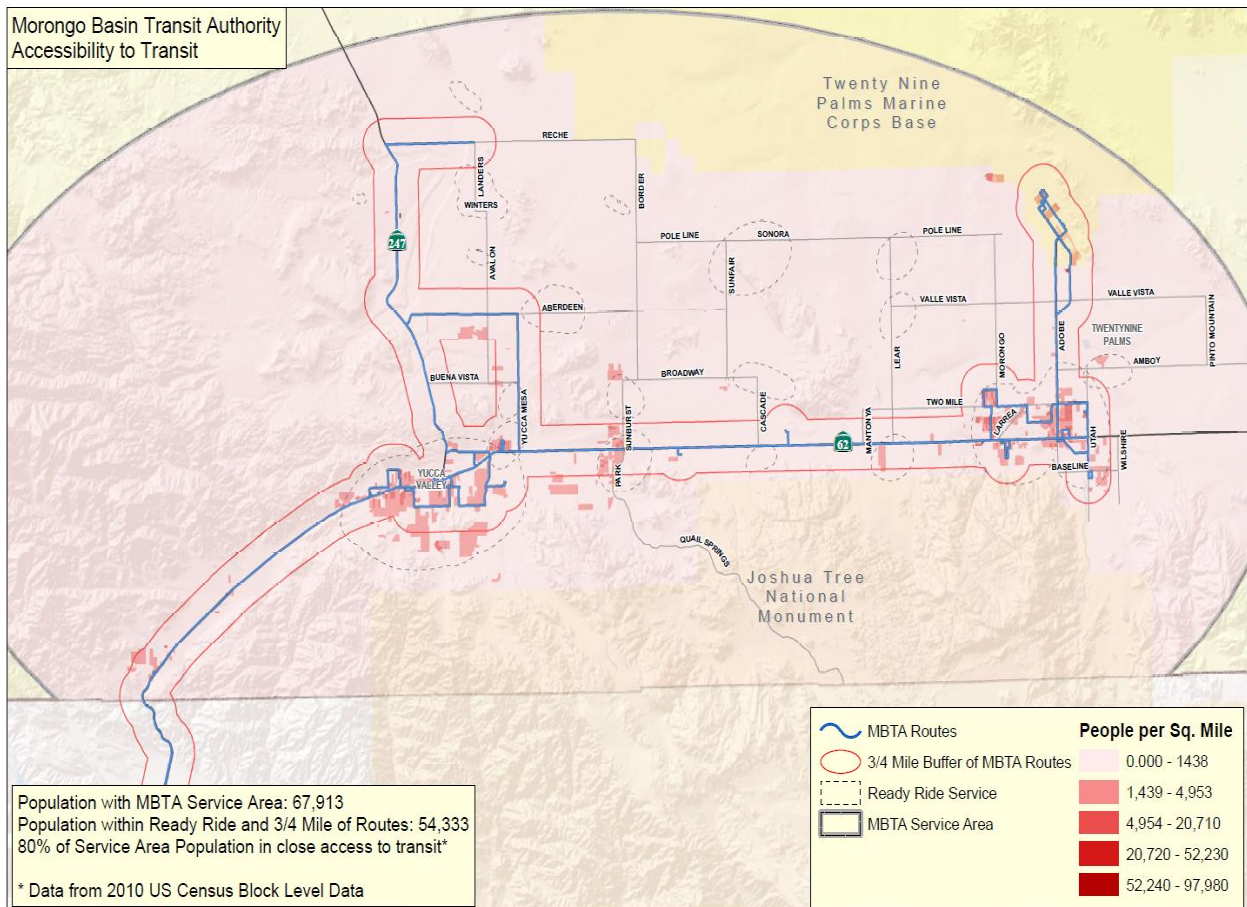
Demand Response:

- 90 percent of all monthly trips operate on-time ten minutes past the scheduled pick-up time, with the pick-up time defined as within the 45 minute manifest block.

Service Availability Standards

Local Service:

- MBTA’s entire service area population includes 67,913 individuals, per the 2012 census and is shown in blue hatch in the map below. Of this, MBTA currently serves 80% of its total service area population, individuals who live within ¾ mile of MBTA fixed route service area or live within the Ready Ride service areas, represented by the purple bubbles below.



The total population within the MBTA Service Area includes those permanently stationed within the Marine Corps base as of the 2010 census.

Demand Response:

- 100% of all trips requested by ADA-qualified patrons within MBTA service area shall be accommodated.

Effective Practices to Fulfill the Service Policy Requirement

Vehicle Assignment Policy

Fixed Route [Local and Intercity]:

Bus assignments take into account the operating characteristics of the various buses within the MBTA fixed route fleet, which are matched to the operating characteristics of the route. In the absence of specific operating requirements, vehicle assignments will be done so as to ensure a random rotation of fleet vehicles through the routes in the MBTA system.

Demand Response:

Except for situations requiring the assignment of a trip to a specific vehicle for reasons such as lift capacity, interior clearance or operating characteristics within the service area, demand response trips shall be assigned so as to ensure that vehicles are randomly operated in these services.

Transit Amenities Policy

The following policies will be applied as funding allows:

- Installation of a shelter should be considered at bus stops with an average per trip boarding of 10 or more passengers. Seating/benches should be considered at bus stops with an average per trip boarding of 5 or more passengers.
- Priority for benches and shelters should be given to bus stops serving senior housing or activity centers, or facilities which serve clients with mobility impairments.