DATE: May 9, 2023

TO: Mayor and Council Members

FROM: Parks, Recreation and Community Services Department

SUBJECT: Title VI of the Civil Rights Act of 1964 Compliance Plan Update

RECOMMENDATION:
It is recommended that the Mayor and Council Members adopt a resolution approving and adopting Title VI of the Civil Rights Act of 1964 Compliance Plan Update for the Senior Transportation Program of the City of Inglewood.

BACKGROUND:
The Federal Government, through the Federal Transit Administration (FTA), provides financial assistance to cities to develop new transit systems and improve, maintain, and operate existing systems. FTA oversees thousands of grants to hundreds of State and local transit providers, primarily through its ten regional offices. Grant recipients are responsible for managing their programs in accordance with Federal requirements, and FTA is responsible for ensuring that recipients follow Federal statutory and administrative requirements. One such requirement is the Title VI Program.

The Title VI Program refers to a document developed by an FTA recipient to demonstrate how the recipient is complying with Title VI requirements. Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance.

Adoption of a Title VI of the Civil Rights Act of 1964 Compliance Plan is required for recipients of federal transportation funds. The City of Inglewood purchased four buses with federal funds through FTA Titles 5310 and 5317. The federally funded vehicles are utilized by the Parks, Recreation and Community Services Department for transportation of senior citizens and disabled adults. As such, the City is required to adopt a Title VI of the Civil Rights Act of 1964 Compliance Plan for the City’s Senior Transportation Program.

DISCUSSION:
On December 8, 2020, the Mayor and Council Members approved the City of Inglewood Title VI Compliance Plan. To remain compliant, the City is required to review and update the plan as needed every three years. The attached City of Inglewood Title VI Compliance Plan reflects required updates since the last approval. The plan was developed by department staff according to guidelines received from the FTA and requires the City to provide the following:
1. Notice of the public’s right to file a complaint of unlawful discriminatory practice in English and Spanish;

2. Identify locations where the Title VI notice is posted;

3. Develop complaint procedures and forms;

4. Develop a public participation and outreach plan; and

5. Develop a language assistance plan.

The City of Inglewood’s Title VI Program has been prepared to ensure that the level and quality of all of its services are provided in a nondiscriminatory manner and that the opportunity for full and fair participation is offered to the City of Inglewood’s beneficiaries and other community members. Additionally, through this program, the City of Inglewood has examined the need for services and materials for persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English.

While it is a matter of principle that the City of Inglewood is committed to ensuring that no person is excluded from participation in, or denied the benefits of, or subjected to discrimination in the receipt of any of the City of Inglewood’s services on the basis of race, color or national origin, the contents of this compliance plan have been prepared in accordance with Section 601 of Title VI of the Civil Rights Act of 1964 and Executive Order 13116 (Improving Access to Services for Persons with Limited English Proficiency).

The City’s compliance plan remains the same except census data has been updated and the required forms have been translated in Spanish. With that, staff recommends the Mayor and Council Members adopt the attached resolution authorizing adoption of the Title VI of the Civil Rights Act of 1964 Compliance Plan Update for the City’s Senior Transportation Program. Failure to adopt a Compliance Plan could result in forfeiture of four City vehicles purchased with FTA funds.

FINANCIAL/FUNDING ISSUES AND SOURCES:
This is a non-financial agreement.

DESCRIPTION OF ANY ATTACHMENTS:
Attachment No. 1: Title VI Resolution
Attachment No. 2: City of Inglewood Title VI Compliance Plan

PREPARED BY:
Sabrina Barnes, Parks, Recreation and Community Services Director

COUNCIL PRESENTER:
Sabrina Barnes, Parks, Recreation and Community Services Director
APPROVAL VERIFICATION SHEET

DEPARTMENT HEAD APPROVAL: [Signature]
Sabrina Barnes, Parks, Rec., & Comm Svcs. Director

ASSISTANT CITY MANAGER APPROVAL: [Signature]
Louis Atwell, Assistant City Manager

CITY MANAGER APPROVAL: [Signature]
Artie Fields, City Manager
ATTACHMENT NO. 1
RESOLUTION NO.: ______

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF INGLEWOOD, CALIFORNIA, APPROVING AND ADOPTING AN UPDATED TITLE VI COMPLIANCE PLAN AND AUTHORIZING THE CITY MANAGER, OR DESIGNEE, TO FILE ANY DOCUMENT OR REPORT NECESSARY TO BE IN COMPLIANCE WITH THE LAW.

WHEREAS, the City of Inglewood desires to comply with Title VI of the Civil Rights Act of 1964, including the provisions detailed in U.S. Department of Transportation's FTA Circular 4702, 1B, "Title VI Requirement and Guidelines for Federal Transit Administration Recipients;" and

WHEREAS, Section 601 of Title VI of the Civil Rights Act of 1964 (Title VI) states the following: No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance; and

WHEREAS, the City of Inglewood has updated and desires to authorize approval of the compliance plan (hereinafter referred to as the "Plan") developed by staff to comply with necessary provisions of the Civil Rights Act.

NOW THEREFORE, THE CITY COUNCIL OF THE CITY OF INGLEWOOD, CALIFORNIA, DOES HEREBY RESOLVE TO:

SECTION 1. Approve and adopt, as required by law, the City of Inglewood’s updated March 21, 2023, Title VI Compliance Plan marked as Exhibit “A,” and incorporated herein by this reference as if set forth in full.

SECTION 2. Grant the City Manager, or his designee, the authority to implement the components of the Plan, except to sign contracts, in order to meet Federal requirements, to complete and file any necessary documents or reports to be in compliance with the law and to implement policies that may be necessary to comply with subsequent revisions or interpretations to the Civil Rights Act.

///
BE IT FURTHER RESOLVED that the City Clerk shall certify to the adoption of this resolution and the same shall be in full force and effect immediately upon adoption.

Passed, approved, and adopted this ______ day of ________________, 2023.

________________________________________
James T. Butts, Jr.,
Mayor

ATTEST:

________________________________________
Aisha L. Thompson,
City Clerk
ATTACHMENT NO. 2
TITLE VI PROGRAM

Updated: March 21, 2023

One Manchester Boulevard - Suite 500
Inglewood, CA 90301
Ph: (310) 412-8750  Fax: (310) 412-8792
www.cityofinglewood.org
INTRODUCTION

This document was prepared by the City of Inglewood to comply with Title VI of the Civil Rights Act of 1964, including new provisions detailed in the U.S. Department of Transportation’s FTA Circular 4702.1B, “Title VI Requirement and Guidelines for Federal Transit Administration Recipients.”

The City of Inglewood’s Title VI Program has been prepared to ensure that the level and quality of all of its services are provided in a nondiscriminatory manner and that the opportunity for full and fair participation is offered to the City of Inglewood’s beneficiaries and other community members. Additionally, through this program, the City of Inglewood has examined the need for services and materials for persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English.

While it is a matter of principle that the City of Inglewood is committed to ensuring that no person is excluded from participation in, or denied the benefits of, or subjected to discrimination in the receipt of any of the City of Inglewood’s services on the basis of race, color or national origin, the contents of this program have been prepared in accordance with Section 601 of Title VI of the Civil Rights Act of 1964 and Executive Order 13116 (Improving Access to Services for Persons with Limited English Proficiency).

About the City of Inglewood and Senior Transportation

The City of Inglewood is a public agency incorporated as a city in 1908. The current population is 105,179 of which Hispanics comprise of 47.2%, African Americans 42.8%, Whites 6.0%, Asians 1.2% and persons age 65 or older, 13.5%. There has been a significant population shift in the past 20 years. The City of Inglewood had been predominantly African American and has since shifted a large portion to Hispanic. The City of Hawthorne had been predominantly White and currently has more than half of its population Hispanic while African American are nearly one quarter of the residents, with a minority of White and Asian residents.

The City of Inglewood operates a comprehensive transportation program for senior citizens, age 60 and over and adults with disabilities through the Parks, Recreation and
Community Services Department. The program includes a demand response (Dial-A-Ride) service, taxi coupon voucher service, discounted Metro senior TAP cards, and a free trolley type vehicle operating on a fixed route. The Dial-A-Ride consists of eight (8) cutaway vehicles operating in the service areas of Inglewood and Hawthorne. Eligible patrons may sign up for the service through the Transportation Office at the Inglewood Senior Center, located at 111 N. Locust Street, Inglewood, CA 90301, and can schedule rides through the dispatch office. The cost for the Dial-A-Ride service is fifty ($0.50) cents one-way or a van pass may be purchased for $5 per month at the Transportation Office, by mail or by a new drop box located at The Senior Center. Cutaway vehicles range in capacity size, from 16-passenger to 24-passenger vehicles. Group trips are scheduled on the larger vehicles. All eight of the Dial-A-ride vehicles were purchased with Federal 5310 grant funds.

Seniors and adults with disabilities may purchase taxi coupon booklets at the Transportation Office inside the Inglewood Senior Center for $5. The taxi coupon booklets are worth $30 in fares. Patrons purchase the booklets on a monthly basis. Clients are assessed as to a demonstrated need. Two taxicab companies are under contract with the City of Inglewood to provide this service.

Discount Metro bus passes (TAP cards) are sold at the Transportation Office and at the City cashier’s office for $10 per month instead of $20 on the Metro pass sales schedule. These pre-paid cards cover fares on all Metro transportation including buses and light rail.

Participation in the Inglewood Paratransit program has followed the demographic trends, with the Hispanic population continuing to grow. Bilingual staff are available and and or are knowledgeable about other transportation providers and resources and refer clients to services such as Access Services, Metro Micro Transit, I-Ride, Ride Hail services such as Lyft/Uber and FAME. They also provide information on bus routes, transfer points to other transportation resources and other relevant resources. They also provide individual transportation counseling to the clients as to their transportation needs and options.

Staffing consists of a human services transportation manager; a dispatcher and assistant dispatcher; and nine bus operators. A dispatcher and driver are bi-lingual (English-Spanish).
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Updated: 4/12/2023
Notifying the Public of Rights Under Title VI

CITY OF INGLEWOOD

The City of Inglewood operates its Inglewood paratransit programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act of 1964. Any person who believes she/he/they has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the City of Inglewood.

For more information on the City of Inglewood's civil rights program, and the procedures to file a complaint about the Inglewood paratransit program, contact the Director of the Parks, Recreation and Community Services Department at (310) 412-8750, or visit our administrative office at Inglewood City Hall, One Manchester Blvd., Ste. 500, Inglewood, CA, 90301, Suite 500 or website at www.cityofinglewood.org.

A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.

If information is needed in another language, contact (310) 412-8750.
Si se necesita información en otro idioma, contacte al (310) 412-8750.

Notificando el público de los derechos bajo el título VI

CIUDAD DE INGLEWOOD

La ciudad de Inglewood opera sus programas de Inglewood paratransit y servicios sin respecto a raza, color y origen nacional con arreglo al título VI de la Ley Civil de derechos. Cualquier persona que cree que él /ella/elle ha sido agraviado por cualquier práctica discriminatoria ilegal bajo el título VI puede presentar una queja con la ciudad de Inglewood.

Para obtener más información sobre el programa derechos civiles capaz de industrias y los procedimientos para presentar una queja sobre el programa del Inglewood paratransit, llame al (310) 412-8750, o visite nuestra oficina administrativa en Inglewood City Hall, One Manchester Blvd., Ste. 500, Inglewood, CA 90301. Para más información, visite www.cityofinglewood.org.

Un demandante puede presentar una queja directamente con el Federal Transit Administración para archivar una queja con la Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.

Si se necesita información en otro idioma, contacte al (310) 412-8750.
List of Locations Where Title VI Notice Is Posted

The City of Inglewood notice to the public will be posted at the following locations:

<table>
<thead>
<tr>
<th>Location Name</th>
<th>Address</th>
<th>City</th>
</tr>
</thead>
<tbody>
<tr>
<td>City Hall Information Posting Board</td>
<td>City of Inglewood, First floor One Manchester Blvd.</td>
<td>Inglewood, CA 90301</td>
</tr>
<tr>
<td>Senior Center Transportation Office</td>
<td>111 N. Locust Street</td>
<td>Inglewood, CA 90301</td>
</tr>
<tr>
<td>City Council Information Board</td>
<td>City of Inglewood, Ninth (9th) floor One Manchester Blvd.</td>
<td>Inglewood, CA 90301</td>
</tr>
<tr>
<td>5310 Vehicles</td>
<td>City Yard 222 W. Beach Ave.</td>
<td>Inglewood, CA 90302</td>
</tr>
</tbody>
</table>

The Title VI notice and program information will also be provided on the City of Inglewood website at www.cityofinglewood.org.
Title VI Complaint Procedures

The following Complaint Procedures will be provided on the City of Inglewood’s website at www.cityofinglewood.org. As a recipient of federal dollars, the City of Inglewood’s paratransit program is required to comply with Title VI of the Civil Rights Act of 1964 and ensure that services and benefits are provided on a non-discriminatory basis. The City of Inglewood has in place a Title VI Complaint Procedure, which outlines a process for local disposition of Title VI complaints and is consistent with guidelines found in the Federal Transit Administration Circular 4702.1B, dated October 1, 2012.

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by the City of Inglewood Transportation office may file a Title VI complaint by completing and submitting the agency’s Title VI Complaint Form to the Civil Rights Program Officer, Inglewood Parks, Recreation and Community Services, One Manchester Blvd., Inglewood, CA 90301. The Title VI Complaint Form will be provided on the City of Inglewood’s website at www.cityofinglewood.org. The City of Inglewood investigates complaints received no more than 180 days after the alleged incident. The City of Inglewood will only process complaints that are complete.

Within 10 business days of receiving the complaint, the City of Inglewood will review it to determine if this office has jurisdiction. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by this office. The City of Inglewood has 30 days to investigate the complaint. The complainant will be notified in writing of the cause to any planned extension to the 30-day rule.

If more information is needed to resolve the case, the City of Inglewood may contact the complainant. The complainant has 10 business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within 10 business days, the City of Inglewood can administratively close the case.

A case can be administratively closed also if the complainant no longer wishes to pursue his/her/their case. After the investigator reviews the complaint, she/he will issue one of two letters to the complainant: a closure letter or 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. An 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 wishes to appeal the decision, he/she/they has 10 business days after the date of the letter or the LOF to do so.

A person may also file a complaint directly with the Federal Transit Administration, at FTA Office of Civil Rights, Attn: Title VI Program Coordinator, East Bldg., 5th Floor – TCR, 1200 New Jersey Avenue SE, Washington, DC 20590.

Si se necesita información en otro idioma, contacte al (310) 412-8750.
# The City of Inglewood Title VI Complaint Form

**COMPLAINT FORM**

### Section I: Please write legibly

1. **Name:**

2. **Address:**

3. **Telephone:**

   3a. **Secondary Phone (Optional):**

4. **Email Address:**

5. **Accessible Format Requirements?**
   - [ ] Large Print
   - [ ] Audio Tape
   - [ ] TDD
   - [ ] Other

### Section II:

6. Are you filing this complaint on your own behalf?  **YES**  **NO**

*If you answered "yes" to #6, go to Section III.

7. If you answered "no" to #6, what is the name of the person for whom you are filing this complaint? **Name:**

8. What is your relationship with this individual?

9. Please explain why you have filed for a third party:

10. Please confirm that you have obtained permission of the aggrieved party to file on their behalf.  **YES**  **NO**

### Section III:

11. I believe the discrimination I experienced was based on (check all that apply):
   - [ ] Race
   - [ ] Color
   - [ ] National Origin

12. **Date of alleged discrimination: (mm/dd/yyyy)**

13. Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known), as well as names and contact information of any witnesses. If more space is needed, please attach additional sheets of paper.
14. Have you previously filed a Title VI complaint with the City of Inglewood?  
   [ ] 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 _____________________________ Date ____________

If you are not able to sign please check here: [ ]

Please submit this form in person or mail this form to the address below:
The City of Inglewood, Title VI Coordinator
One Manchester Boulevard
Inglewood, CA 90301

Updated: 4/12/2023
Titulo VI Procedimiento de Queja

Como un receptor de dólares federales, la ciudad de Inglewood tiene que cumplir con lo dispuesto en el Titulo VI de la ley de los derechos civiles de 1964 y asegúrese de que los servicios y los beneficios se proporcionen sobre una base no discriminatoria. La ciudad de Inglewood ha puesto en marcha un procedimiento de queja Titulo VI, que emboza un proceso de disposición local de quejas del Titulo VI y es consistente con las pautas de Administración Federal de Transito Circular 4702.1B, de Octubre 1, 2012.

Cualquier persona que cree que ha sido objeto de discriminación por motivos de raza, color, u origen nacional por la ciudad de Inglewood puede presentar al Titulo VI su denuncia. La ciudad de Inglewood investiga las quejas no más de 180 días después del incidente. La ciudad de Inglewood solo tramitara las quejas que están completas.

En un periodo de 10 días de haber recibido la demanda, la ciudad de Inglewood la revisara para determinar si nuestra oficina tiene la jurisdicción. El autor de la queja, recibirá un acuse de recibo informándole al denunciante que será notificado por escrito si el caso de él/ella/elle será investigado por nuestra oficina. La ciudad de Inglewood tiene 30 días para investigar la queja.

Si necesita más información para resolver el caso, la ciudad de Inglewood puede contactar al autor de la queja. El autor de la queja tiene 10 días de la fecha que recibió la carta para solicitar un investigador que sea asignado al caso.

El caso se puede cerrar también si el autor de la queja no desea proseguir con el caso. Después de que el investigador analice la queja, él / ella/elle emitirá una de las dos cartas al denunciante.
FORMA DE QUEJA

Sección I: Escriba en forma legible

1. Nombre:

2. Dirección:

3. Teléfono: 3.a. Teléfono secundario (opcional):

4. Dirección de correo electrónico:

5. Requisitos de forma accesible?
   - [ ] Impresion grande
   - [ ] Cinta de audio
   - [ ] TDD
   - [ ] Otros

Sección II:

6. Está presentando esta queja en su propio nombre? Sí No

*Si usted contestó “Sí” a la #6, vaya a la Sección III.

7. Si usted contestó “no” a la #6 cuál es el nombre de la persona por quien está presentando esta queja?

8. Cuál es su relación con este individuo:

9. Por favor, explique por qué han presentado para una tercera parte:

10. Por favor, confirme que ha obtenido el permiso de la parte agravada en el archivo en su nombre. Sí No

Sección III:

11. Creo que la discriminación que he experimentado fue basado en (marque todas las que correspondan):

   - [ ] Raza
   - [ ] Color
   - [ ] Origin nacional

12. Fecha de supuesta discriminación: (mm/dd/yyyy)

13. Explique lo más claramente posible lo que ocurrió y por qué usted cree que fue discriminado. Describa todas las personas que han participado. Incluya el nombre y la información de contacto de la(s) persona(s) que discriminaron contra usted (si se conoce), así como los nombres y la información de contacto de los testigos. Si se necesita más espacio, por favor adjunte hojas adicionales de papel.

Updated: 4/12/2023

11
14. Anteriormente ha presentado un Título VI denuncia con la ciudad de Inglewood  

<table>
<thead>
<tr>
<th>Sí</th>
<th>No</th>
</tr>
</thead>
</table>

**Sección V:**

15. Ha presentado esta queja con cualquier otra agencia local, Estatal o Federal, o con cualquier corte Federal o Estatal? [ ] Sí* [ ] No  

Marque todo lo que aplique

[ ] Agencia Federal  
[ ] Agencia Estatal  

[ ] Tribunal Federal  
[ ] Agencia Local  

[ ] Tribunal Estatal

16. Si usted contestó "sí" a la #15, proporcione información acerca de una persona de contacto en la agencia/tribunal donde se presentó la denuncia.

<table>
<thead>
<tr>
<th>Nombre:</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Título:</td>
<td></td>
</tr>
<tr>
<td>Organismo:</td>
<td></td>
</tr>
<tr>
<td>Dirección:</td>
<td></td>
</tr>
<tr>
<td>Teléfono:</td>
<td></td>
</tr>
<tr>
<td>Correo electrónico:</td>
<td></td>
</tr>
</tbody>
</table>

**Sección VI:**

Nombre de la agencia de tránsito que la queja es contra:  
Persona de contacto:  
Teléfono:

Usted puede adjuntar cualquier material escrito u otra información que considere relevante para su reclamación.

Firma: __________________________ Fecha: __________________________

Si no puede firmar por favor marque aquí: [ ]

Por favor, envíe este formulario en persona o por correo este formulario a la siguiente dirección:

The City of Inglewood, Título VI Coordinador  
One Manchester Blvd.  
Inglewood, CA 90301

Updated: 4/12/2023
List of Transit-related Title VI Investigations, Complaints, and Lawsuits

In order to comply with the reporting requirements of 49 CFR Section 21.9(b), the City of Inglewood will prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, or national origin: active investigations conducted by entities other than FTA; lawsuits; and complaints naming the recipient. This list shall include the date that the investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by the City in response, or final findings related to, the investigation, lawsuit, or complaint. This list shall be included in the Title VI Program submitted to FTA every three years.

The City of Inglewood has not been involved in any transportation-related Title VI investigations, lawsuits or complaints.

Public Participation Plan

Public Participation Process

The Inglewood Public Participation Plan will explicitly describe the goals and proactive strategies for public participation, engagement and public outreach including how, when, and how often public participation activities take place, based on a demographic analysis of the populations affected the type of program or service under consideration and the resources available. Examples of actions that will prompt public participation are changes in Dial-A-Ride fares, operating times, or operating costs, changes in 1-Line cost or route, and changes in the administration of the Metro TAP cards. Points to be considered in the Plan include:

- When the public will be engaged
- How the public will be engaged
- Efforts to include minority and low income residents
- Public meetings
- Publicity and media
- Identification of stakeholders

Ongoing outreach efforts over the past three years include traditional marketing, publicity and advocacy efforts. The Senior Center publishes a monthly newsletter and puts out press releases to local publications. Flyers and posters are placed where seniors congregate, such as at senior centers, transit centers, senior housing units, City Hall Information desk, libraries, parks, medical facilities and on the buses. The City staffs booths or tables at community events and health fairs. Satisfaction surveys are collected from the clients and utilized to improve the service.

Updated: 4/12/2023
Public Meetings

Public meetings include City Council meetings, public hearings and other special meetings hosted by the City.

- The City of Inglewood will host public meetings to discuss proposed changes to the City’s Dial-A-Ride and I-Line services.
- The City will host meetings in ADA accessible locations and at various times of the day to accommodate low income, minority and persons with disabilities and working individuals.

City of Inglewood’s Mediums

- Senior Citizen Monthly Newsletter, “Voice of Experience”
- Press Releases
- Flyers
- Email
- Tabling at Community Events
- Surveys
- Website

Addressing Comments

Once the City has received comments from the public, they will be reviewed and taken into consideration before changes are made at a future meeting.

A formal Public Participation Plan will be developed with the formalization of current committees that advise on programs, policies and future directions in the area of transportation.

1. Transportation Advisory Committee (TAC)
This committee is comprised of transportation participants. They meet monthly with the Transportation Manager to discuss participant complaints, suggest solutions and advise on ways to improve the program. They serve as the eyes and ears for the Manager who relies on them to communicate with other riders and bring back their suggestions. All committee members are low income and minority and include LEP individuals.

2. Senior Citizen Project Advisory Council (PAC)
This Council advises on programs, policies and issues of concern for seniors in the service area of Inglewood and Hawthorne. Programs offered through the Inglewood Senior Center, which serves as the hub for seniors in the service area, include transportation, nutrition, home delivered meals, classes, support groups, trips, information and assistance, case management and social services. PAC meets monthly, and consists of 25 members,
representatives from the communities in the service area and reflective of the demographics of the area. Transportation is a key issue and the Transportation Manager and the TAC will work hand in hand with PAC.

3. Healthy and Sustainable Inglewood Collaboration (HSIC)
Since 2012, the City of Inglewood has been working with two community organizations to plan and publish a blueprint for a healthy and sustainable Inglewood, which may be considered for inclusion in the City’s General Plan. The City, Social Justice Learning Institute and Tree People have led the effort with over 50 community organizations and individuals involved in an intensive, interactive and participatory planning process for a healthy and sustainable community, which includes transportation. The Inglewood paratransit program, in addition to providing direct transportation service, is committed to teaching seniors the benefits of cycling, walking, and taking public transportation and how it can positively impact personal health.

4. Metro Local Transit Operators Organization
The Transportation Manager (TTM) is active on the Metro local transit operators’ organization (LTSS), and takes advantage of trainings from entities such as Cal Act, CTSA, Access Services and SCAG and brings the information back to staff, clients and the community. This gives them a broader view of transportation issues. The TTM schedules workshops and training sessions for seniors regarding formal and informal transportation resources in the service area and how to use public transportation. The TTM also arranges meetings with representatives of cab companies and Access Services so they get direct feedback from the seniors.

Minority Representation on Planning and Advisory Bodies

Title 49 CFR Section 21.5(b) (1) (vii) states that a recipient may not, on the grounds of race, color, or national origin, “deny a person the opportunity to participate as a member of a planning, advisory, or similar body which is an integral part of the program.” The City of Inglewood does not have formal transit-related, non-elected planning board, advisory council or committees, or similar committees at the present time but when it does, it will encourage the participation of minorities on such committees.

Determination of Site or Location of Facilities

Title 49 CFR Section 21.9(b)(3) states, “In determining the site or location of facilities, a recipient or applicant may not make selections with the purpose or effect of excluding persons from, denying them the benefits of, or subjecting them to discrimination under any program to which this regulation applies, on the grounds of race, color, or national origin; or with the purpose or effect of defeating or substantially impairing the accomplishment of the objectives of the Act or this part.” Title 49 CFR part 21, Appendix C, Section (3)(iv) provides, “The location of projects requiring land acquisition and the displacement of persons from their residences and businesses may not be determined on the basis of race, color, or national origin.” This Section does not apply because the City has not used FTA funds for the construction of a facility.

Updated: 4/12/2023
Language Assistance Plan

Overview
The first section in this document describes the purpose of the Language Assistance Plan (LAP). The second section in this document provides the four-factor Limited English Proficient (LEP) analysis (as outlined by the Department of Transportation (DOT) used to identify LEP needs and assistance measures. The four-factor LEP analysis includes:

Factor 1: The number or proportion of LEP persons in the service area who may be served or are likely to encounter the Inglewood paratransit program, activity or service.

Factor 2: The frequency with which LEP persons come in contact with the Inglewood paratransit program, activity or service.

Factor 3: The nature and importance of programs, activities or services provided by Inglewood paratransit program, activity or service to the LEP population.

Factor 4: The resources available to the Inglewood paratransit program, activity or service and overall cost to provide LEP assistance.

The third and final section discusses the implementation of the Language Assistance Plan, which includes methodologies for identifying LEP individuals, providing services, establishing policies, monitoring the LAP, and recommendations for future LAP implementations. Purpose of the Language Assistance Plan:

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance. One critical concern addressed by Title VI is the language barrier that Limited English Proficiency (LEP) persons face with respect to accessing information about and using transit service. Transit operators must ensure that this group has adequate access to the agency's programs and activities, including public participation opportunities.

Executive Order 13166, titled "Improving Access to Services for Persons with Limited English Proficiency," forbids funding recipients from "restricting an individual in any way in the enjoyment of any advantage or privilege enjoyed by others receiving any service, financial aid, or other benefit under the program," or from "utilize[ing] criteria or methods of administration which have the effect of subjecting individuals to discrimination because of their race, color, or national origin, or have the effect of defeating or substantially impairing accomplishment of the objectives of the program as respects to individuals of a particular race, color, or national origin."

Updated: 4/12/2023
FTA Circular 4702.1B was developed by the Federal Transit Administration (FTA) and details the administrative and reporting requirements for recipients of FTA financial assistance to comply with Title VI and related executive orders including on LEP.

The United States Department of Transportation (DOT) published guidance that directed its recipients to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for LEP customers. The City of Inglewood's language assistance plan (LAP) includes a four-factor analysis and implementation plan that complies with the requirements of DOT LEP guidance.

Four Factor Analysis

Factor 1: The number or proportion of LEP persons in the service area who may be served or are likely to encounter the Inglewood paratransit program, activity or service.

The following table describes the elderly population by race in the three communities served by the Inglewood paratransit program.

<table>
<thead>
<tr>
<th>City Population</th>
<th>Seniors 65+</th>
<th>Hispanic</th>
<th>African American</th>
<th>White</th>
<th>Asian</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>% #</td>
<td>% #</td>
<td>% #</td>
<td>% #</td>
<td>% #</td>
</tr>
<tr>
<td>Inglewood</td>
<td>13.52 14,223</td>
<td>47.2 49,607</td>
<td>42.8 44,994</td>
<td>6 6287</td>
<td>1.2 1,251</td>
</tr>
<tr>
<td>Hawthorne</td>
<td>10.80 9,306</td>
<td>60.74 52,292</td>
<td>21.37 18,396</td>
<td>7.91 6,812</td>
<td>6.11 5,257</td>
</tr>
<tr>
<td>Total</td>
<td>194,485 23,529</td>
<td>65.77% 101,899</td>
<td>21.57 63,390</td>
<td>5.57 13,099</td>
<td>4.00 6,508</td>
</tr>
</tbody>
</table>

American Community Survey
The U.S. Census Bureau 2021 American Community Survey (ACS) Language Spoken at Home by the Ability to Speak English indicates that only Spanish meets the 5% or 1,000 person criteria in the zip code areas covered by the Inglewood paratransit program in the category 18 years and older.
Factor 2: The frequency with which LEP persons come in contact with the Inglewood paratransit program, activity or service.

LEP persons come in contact with the Inglewood paratransit program through the Senior Transportation office; the Transportation Manager's office; Parks, Recreation and Community Service Department or one of the four Senior Centers. According to the staff at the Transportation offices, 20% of the inquiries about transportation to each of these offices are from LEP individuals.

According to the census data described above, each Senior Center has a different population mix, and the participation in the Inglewood paratransit program reflects this mix, as many of the seniors utilize transportation to get to the Centers. According to the Site Managers: The Hawthorne Senior Center has an average attendance of 75 people per day and consists of 40% African American and 40% Hispanic, 15% White, and 5% Asian. Of the Hispanic group, 80% are identified as LEP (20). The Inglewood Senior Center has an attendance of 100 seniors per day and consists of 80% African American and 20% Hispanic. 5% of the Hispanic population identify as LEP (9). Transportation is coordinated in quadrants of the service area so Spanish speaking drivers on the buses are concentrated in the areas of Hispanic population. Analyzing the route sheet data on eight buses and interviewing the bus drivers, there are approximately 33% of daily riders who are LEP. In a normal operating environment, an average number of trips per day is 115, of which 15 are LEP riders.

Reviewing data supplied by the Transportation Assistant and City Cashier, who sell the discount Metro TAP cards, an average of 20 cards are sold monthly, with 7% Spanish LEP purchasers. Reviewing data supplied by the Transportation Assessor who sells the discount cab coupon booklets, approximately 5% are LEP.

Another point of contact with LEP populations is community outreach and events. Many of these activities are located in heavily populated Hispanic areas with Spanish speakers to explain the information orally.

Printed materials in Spanish are also provided.

Factor 3: The nature and importance of programs, activities or services provided by Inglewood paratransit program, activity or service to the LEP population.

There have been many needs assessments of seniors conducted by research institutions. Need for transportation is one of the most often mentioned, especially by seniors in low income, minority areas. Many LEP seniors have limited income, no car and no one to drive them to critical destinations such as doctors' offices, grocery stores or social service agencies. Many may have physical or mental conditions that require transportation assistance. The Inglewood paratransit Program serves this need. Given the importance of transportation to the lives of seniors and the disabled community, we must ensure that language is not a barrier to access.
**Factor 4:** The resources available to the Inglewood paratransit program, activity or service and overall cost to provide LEP assistance.

Revenue sources include Proposition A and Proposition C Local Return funds; MTA Incentive Program for transportation coordination; City of Hawthorne for its percentage of ridership; Costs for providing LEP assistance are not tracked separately and are included in staffing, office supplies and special expenses line items. Approximately $3,000 is estimated to be needed to translate all our documents and publicity, driver’s training and other services listed in the implementation of the Language Assistance Plan.

**Language Assistance Implementation Plan**

**Safe Harbor Provision**

The Federal Transit Authority Circular 4702.1B states:

"DOT has adopted DOJ's Safe Harbor Provision, which outlines circumstances that can provide a “safe harbor” for recipients regarding translation of written materials for LEP populations. The Safe Harbor Provision stipulates that, if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with the recipient's written translation obligations. Translation of non-vital documents, if needed, can be provided orally. If there are fewer than 50 persons in a language group that reaches the five percent (5%) trigger, the recipient is not required to translate vital written materials but should provide written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost.

These safe harbor provisions apply to the translation of written documents only. They do not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable. A recipient may determine, based on the Four Factor Analysis, that even though a language group meets the threshold specified by the Safe Harbor Provision, written translation may not be an effective means to provide language assistance measures. For example, a recipient may determine that a large number of persons in that language group have low literacy skills in their native language and therefore require oral interpretation. In such cases, background documentation regarding the determination shall be provided to FTA in the Title VI Program."

The City of Inglewood paratransit program will provide documents according to the Safe Harbor Provision in Spanish, the only language that meets the 5% provision. Should other languages need to be utilized, the agency staff will translate those on an as needed basis, then utilized from that point on **Implementation of the Language Assistance Plan**.
The results of the Four Factor Analysis conclude that Spanish is the only LEP language groups encountered by the City of Inglewood's paratransit program. The implementation of the Language Assistance Plan will include methodologies for the following:

**Identifying LEP Individuals**
LEP individuals will continue to be identified through outreach in the communities served by the Inglewood paratransit program. The Four Factor Analysis indicated the demographics of the service area and concentration of the LEP seniors, how the LEP persons come in contact with the Inglewood paratransit program, the importance of the program and the resources available to provide LEP assistance. The fact that the Hispanic population continues to grow indicates a need to extend our efforts to make sure adequate language assistance is available. Given that, most of the clients have limited reading skills the paratransit program will emphasize oral and personal contacts; have a presence at as many community events such as Fiestas and health fairs as possible and make sure there are sufficient trained staff and volunteers at all information offices and Senior Centers. Information will be published in local and regional newspapers such as “El Aviso” and “La Opinión” and on local Spanish radio stations.

**Language Assistance Services**
All first contact staff - receptionist and telephone contact - are bilingual staff or volunteers versed in providing comprehensive information regarding the agency's services. There are program staff who are bilingual or capable of communicating with persons unable to speak or understand English. – Program specialist, driver, and dispatcher - are either bilingual or capable of communicating with persons unable to speak or understand English. Notice of language service assistance will be included in brochures, flyers, posters and on the City web site.

**Surveys**
The Inglewood paratransit program will conduct triennial surveys to get suggestions for its Language Assistance Plan for providing services to customers unable to communicate in English:

1. Survey of current riders and customers
2. Survey of employees
3. Survey of members of the Transportation Advisory Committee (TAC) and the Project Advisory Committee (PAC) members

**Communicating Availability of Language Assistance**
Notice of Language Service Assistance will be included in brochures, flyers, posters and on the city web site. The city web site has a “Google Translate” option and has a language designation (From: To:) option on the City's cover page with instructions in Spanish to guide users to the link.

Updated: 4/12/2023
Vital Documents
Vital translated documents include:

1. Title VI Civil Rights Notice
2. Title VI Complaint Procedures
3. Title VI Complaint Forms
4. Dial-A-Ride Applications
5. Schedules for services

Monitoring and Updating
The Transportation Manager will utilize the TAC and PAC to help formulate and update the Language Assistance Plan. This Plan shall be included in the Title VI Program submitted to FTA every three years.

Employee Training
The Transportation Manager meets twice a month with the staff and includes LEP training as part of the meeting. The Transportation Manager will utilize the TAC and PAC to help formulate additional training for employees.

Recommendations for Future LAP Implementations
This Title VI Program has focused attention on the importance of educating the community about the City’s compliance with the Civil Rights Act of 1964 and of implementing a Language Assistance Plan for the Inglewood paratransit program. Free and low cost transportation is vitally important to the lives of the seniors in the service area of Inglewood and Hawthorne. This assistance goes beyond actual provision of transportation to educating the clients about other transportation options in the community they might be eligible for, and making sure that language is not a barrier to getting this help.