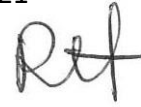


**To:** Board of Directors

**Date:** 10/13/2021

**From:** Melody Reeb, Manager of Planning

**Reviewed by:**



---

**SUBJECT: 2021 Title VI Program Update**

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**Background:**

As a federal grant recipient, County Connection is required to maintain and provide to the Federal Transit Administration (FTA) information on its compliance with the Title VI regulations. County Connection must perform a self-assessment every three years and to document that services and benefits are provided in a non-discriminatory manner. The last Title VI Program was adopted by the Board of Directors in March 2018. This update covers the period from 2019 through 2021.

**Program Updates:**

The most significant changes in this year's report were updates to demographic information as well as service profiles and performance. As part of its Title VI Program, County Connection must evaluate its services to ensure that they are provided equitably across minority and low-income populations based on adopted standards and policies. These metrics assess various aspects of the system, including service quality, accessibility, and distribution of amenities. Staff used the most recent Census Block Group data from the 2019 American Community Survey (ACS) to analyze service area demographics, including race and income. The analysis concluded that all service standards and policies were met.

Census data was also used along with data from the most recent onboard survey to update the Language Assistance Plan (LAP). The LAP is used to ensure that Limited English Proficiency (LEP) populations have meaningful access to County Connection's programs and services, including public participation opportunities. The analysis in the plan identifies LEP needs and assistance measures and determines languages that fall within the federal "Safe Harbor" guidelines, which requires translation of vital documents such as the Title VI Public Notice.

Since the last Title VI Program submission in 2018, County Connection has conducted six equity analyses for major service or fare changes. None of the equity analyses found any disparate impact based on race or disproportionate burden on low-income riders due to the changes that were being proposed.

**Financial Implications:**

None.

**Recommendation:**

The MP&L Committee and staff recommend that the Board review and approve the 2021 Title VI Program. The report has been reviewed by legal counsel.

**Action Requested:**

The MP&L Committee and staff request that the Board approve Resolution 2022-011 authorizing the General Manager to submit the final Title VI Program to the FTA.

**Attachments:**

2021 Title VI Program Report

CENTRAL CONTRA COSTA TRANSIT AUTHORITY

# FINAL Title VI Program Report

To be adopted October 2021

*County Connection*

2477 Arnold Industrial Way

Concord, CA 94520

(925) 676-7500

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# I. INTRODUCTION

This County Connection Title VI Program Report provides policies, procedures, and data analysis to comply with guidelines issued by the Federal Transit Administration of the US Department of Transportation to implement Title VI of the 1964 Civil Rights Act regarding transit services and related benefits. The purpose of Title VI is "to assure that no person shall on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance."

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

As a federal grant recipient, County Connection is required to maintain and provide to FTA information on its compliance with the Title VI regulations. County Connection is required to perform a self-assessment every three years and to document that services and benefits are provided in a non-discriminatory manner. This covers the period from 2019 through 2021.

County Connection, as required under Circular 4702.1B, has included the following information in this program report:

1. Discussion and attachments pertaining to general Title VI requirements.
  - a. Title VI Notice to Public
  - b. Title VI Complaint Procedures
  - c. List of Investigations, Complaints, or Lawsuits
  - d. Public Participation Plan
  - e. Language Assistance Plan
  - f. Membership of Non-elected Committees
  - g. Sub-recipient Monitoring
  - h. Board Meeting Minutes

- i. Construction Projects
  - j. Additional Information Upon Request
- 2. Discussion and attachments pertaining to Title VI requirements for transit operators.
  - a. Service Standards and Policies
  - b. Demographic and Service Profile
  - c. Demographic Ridership and Travel Patterns
  - d. Monitoring Program Results
  - e. Public Engagement for Policy Development
  - f. Title VI Equity Analyses
- 3. All other required submittals.

## II. GENERAL REQUIREMENTS

This chapter responds to the general reporting information required of all FTA grantees on a triennial basis. The information is required under U.S. Department of Transportation (DOT) regulations.

### A. Title VI Notice to Public

A copy of County Connection's notice to the public that it complies with Title VI is contained in Appendix A.

### B. Title VI Complaint Procedures & Form

County Connection responds to any lawsuits or complaints that allege discrimination on the basis of race, color, or national origin with respect to service or other transit benefits. County Connection makes its procedures for filing a complaint available to members of the public. Copies of County Connection's Title VI complaint process, consumer reports / investigation process overview and Title VI complaint form are contained in Appendix B.

### C. List of Investigations, Complaints, or Lawsuits

County Connection received no Title VI complaints during the review period. Additionally, there have been no Title VI lawsuits filed against County Connection.

### D. Public Participation Plan

A summary of public outreach and involvement activities undertaken in the last three years, and a description of steps taken to ensure that minority and low-income persons had meaningful access to these activities is contained in various portions of this Program Report, including the County Connection's Public Participation Plan in Appendix C and the LEP Plan in Appendix D.

### E. Language Assistance Plan

The County Connection's current Language Assistance Plan for providing language assistance for persons with Limited English Proficiency based on the DOT LEP Guidance is contained in Appendix D.

## **F. Membership of Non-Elected Committees**

County Connection approves (but does not make) appointments to one non-elected committee: the County Connection Advisory Committee. The Advisory Committee is composed of 11 representatives—one from each member jurisdiction of County Connection—to serve in an advisory capacity to the County Connection Board of Directors. Five seats are currently filled, and six are vacant. Responsibilities include providing input on the needs of current and potential fixed-route and paratransit users. The Advisory Committee has contact with the Board of Directors and assists them in any manner the Board deems appropriate.

The purpose of the Advisory Committee is to help County Connection plan a transportation system that is safe, efficient, cost-effective, energy efficient, environmentally responsible, and responsive to the needs of the broadest range of citizens and transit users in Central Contra Costa County. The focus of the Advisory Committee is on issues of direct concern to users of fixed-route bus and accessible services.

The Advisory Committee meets on the second Tuesday every other month at 2:00 p.m. in the County Connection Board Room, 2477 Arnold Industrial Way in Concord. All meetings are open to the public.

The eleven members are appointed for two-year terms, representing and divided among the following constituencies:

- Bus Riders – Representing the diverse population of both Central Contra Costa County and County Connection’s fixed-route and paratransit ridership.
- Community – Representing community interests which also interact with County Connection fixed-route and paratransit services.

The member jurisdictions of County Connection are responsible for the recruitment, selection, and appointment of representatives to the Advisory Committee. Once the jurisdictional governing body appoints a member to the Advisory Committee, responsibility then falls to County Connection’s Board of Directors to approve the appointment. When County Connection learns of impending vacancies, staff requests that the appointing jurisdictions encourage participation by diverse community members.

**G. Sub-recipient Monitoring**

County Connection has no sub-recipients.

**H. Board Meeting Minutes and Resolutions**

*The Board meeting minutes from consideration of this Title VI Program Report, and the associated resolution, will be included in Appendix E following Board adoption.*

**I. Construction Projects**

County Connection has not undertaken any significant construction projects during this reporting period. For any construction projects that require documentation under Title VI Circular 4702.1B, an environmental justice analysis will be prepared and submitted separately as allowed under the circular.

**J. Additional Information Upon Request**

At the discretion of FTA, information other than that required by the circular may be requested. FTA has not requested such information, and none has been provided at this time.

## III. REQUIREMENTS OF TRANSIT OPERATORS

This chapter responds to the specific reporting information required of all transit operators who are FTA grantees on a triennial basis. The information is required under DOT regulations.

### A. Title VI Policies

A copy of County Connection's Major Service Change, Disparate Impact and Disproportionate Burden Policies adopted in June 2013, and System-Wide Service Standards and Policies adopted in December 2014, can be found in Appendix F.

### B. Demographic and Service Profile

County Connection regularly evaluates demographic information as part of any proposed service or fare change, as required by the FTA. In addition, County Connection conducted additional analysis for this Program submission using Census Block Group data from the 2015-2019 American Community Survey (ACS) 5-year estimates. The results are included in Appendix G.

### C. Demographic Ridership and Travel Patterns

County Connection conducts statistically valid samples of passengers every three years. The survey questions include queries regarding race/ethnicity and household income, among many others. A copy of the County Connection 2019 On-Board Survey by ETC Institute is contained in Appendix H.

### D. Monitoring Program Results

The results of County Connection's most recent analysis of service provision versus the System-Wide Service Standards and Policies adopted in December 2014 can be found in Appendix I.

### E. Public Engagement for Policy Development

A summary of the public engagement process utilized to develop and vet County Connection's Major Service Change, Disparate Impact and Disproportionate Burden Policies can be found in Appendix J.

### F. Title VI Equity Analyses

County Connection conducted equity analyses during the review period. All equity analyses revealed the proposed service or fare changes would have no disparate impact and impose no

disproportionate burden findings on protected communities. Complete copies of the equity analyses conducted during the review period are included in Appendix K.



## A. TITLE VI STATEMENT OF POLICY

The County Connection Notice to the Public regarding Title VI rights is included below. It is posted at several highly visible locations around County Connection's Administrative headquarters at 2477 Arnold Industrial Way, Concord, CA, 94520, and on the County Connection website (in Spanish and English). In addition, cards with the English notice are on all County Connection fixed-route vehicles.

### **Title VI Statement of Policy**

The Central Contra Costa Transit Authority (County Connection) grants equal access to its transportation services in Central Contra Costa. County Connection is committed to a policy of nondiscrimination in the conduct of its business, including its responsibilities under Title VI of the Civil Rights Act of 1964, which provides that no person shall, on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under its program of transit services delivery. For information on the County Connection Title VI Program, visit [countyconnection.com](http://countyconnection.com) or call 925-676-7500 (TTY 711).

Any person who believes they have been discriminated against based on race, color or national origin with regard to transit services delivery has the right to file a complaint within 180 days of the alleged incident. You may download a complaint form below or request one by calling 925-676-7500 (TTY 711). A complainant may also file a complaint with the Federal Transit Administration through its Office of Civil Rights: 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 925-676-7500.

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El Central Contra Costa Transit Authority (County Connection) concede a todos los ciudadanos igual acceso a sus servicios de transporte en Central Contra Costa. County Connection está comprometido con una política de no discriminación en la conducción de sus negocios, incluyendo sus responsabilidades bajo el Título VI de la ley de derechos civiles de 1964 que no establece que ninguna persona, por motivos de raza, color u origen nacional, excluida de la participación en, ser negado los beneficios de o ser objeto de discriminación bajo su programa de prestación de servicios

de tránsito. Para obtener información sobre el Programa del Título VI de County Connection, visite [countyconnection.com](http://countyconnection.com) o llame al 925-676-7500 (TTY 711).

Cualquier persona que crea que ha sido discriminada por motivos de raza, color u origen nacional con respecto a la prestación de servicios de tránsito tiene derecho a presentar una queja dentro de los 180 días posteriores al presunto incidente. Puede obtener un formulario de queja a continuación o solicitar uno llamando a 925-676-7500 (TTY 711). Un demandante puede presentar una queja directamente con el tránsito Federal Administración por archivar una queja con la oficina de derechos civiles, Atención: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590

Si necesita información en otro idioma, comuníquese con 925-676-7500.

## B. TITLE VI COMPLAINT PROCEDURES & FORM

The following is a summary of the complaint procedures:

### Title VI Administrator Procedures

1. Maintain log of consumer reports that are potential Title VI claims. These are claims the customer or customer service staff have identified as discrimination based on information available when the consumer report is entered or reviewed. At this initial notification and review stage, some complaints are determined to not be Title VI, mostly by virtue of not being a Title VI discrimination protected class. Discrimination allegations based on age, sex or disability are not Title VI and can be eliminated from further Title VI procedures.
2. Direct complainant to the Title VI Complaint Form (if not previously provided). Forms are available for download from the website or as hard copies sent by mail or picked up by complainants at Count Connection's administrative office. If complainant is unable to complete a written form, agency staff can fill one out on their behalf.
3. Once a Title VI Compliant Form is received, it is to be entered into a log, given a log number and entered into the Title VI Complaint Form Received database. Complaint form must be received within 180 days of alleged incident. If no investigation is initiated, clearly document the reason.
4. Inform complainant that a formal investigation is being conducted or that their complaint is not covered by Title VI. This must be done within 10 working days of receipt of the completed and signed Title VI Complaint Form.
5. Inform customer service that complaint has become a formal Title VI investigation or is not Title VI eligible. Be sure that non-Title VI issues associated with the complaint are being responded to (e.g. driver re-training, discipline, etc.).
6. Research existing information and attempt to determine employee who is the subject of the complaint. Determine who will be conducting investigation and see what is known already.
7. Inform investigator that there is a formal Title VI complaint and what additional information, documentation, and investigation deadlines are involved. Send investigator an Investigation

Form with Section 1 filled out. This should be done within 5 working days of receipt of the Title VI Complaint Form.

8. Investigators should conduct investigation as informed by procedures and policies. This could include contact and interviews with any witnesses. Actions could include counseling and discipline for employees. Investigation Forms should be completed and returned within 10 working days of receipt of the Investigation Form.
9. Draft Investigation Report.
10. Review Investigation Report with investigator. Discuss findings and/or recommendation for resolution.
11. Finalize Investigation Report.
12. If finding of violation of Title VI discrimination, recommend appropriate corrective action. If no finding of Title VI discrimination, explain why not.
13. Notify Complainant of finding (issue determination letter) and right to appeal and appeal process. Complainant should be notified of findings within 60 days of receipt of the complaint form.
14. Notify investigator of finding (including determination letter).
15. Send Investigation Report to General Manager's office. Complainant has 60 days after receipt of determination letter to appeal findings to the General Manager.
16. Update complaint file and log.

## **Investigator Process**

The person conducting the on the ground investigation will be informed that the complaint is a formal Title VI Investigation within 10 working days of receipt of a formal complaint.

Investigator must complete investigation (if necessary) and return completed Title VI Investigator Form within 20 working days of being informed of the formal complaint. Report must include names and titles of all who are contacted about the incident, any evidence reviewed (such as video tapes) and all other relevant information. Investigator is to state why the incident was not a case of

discrimination or what action was taken regarding the person accused of acting in a discriminatory manner. Follow up information may be needed within a 60-day time frame to respond to the complainant with the findings.

The investigation may include discussion of the complaint with all affected parties to determine the nature of the problem. The complainant may be represented by an attorney or other representative of his/her choosing and may bring witnesses and present testimony and evidence in the course of the investigation.

## County Connection Title VI Investigator Form

### **Section 1 - Case Information (from Title VI Administrator)**

Title VI Complaint Form Number: \_\_\_\_\_  
Consumer Report & Folder Number (if it exists): \_\_\_\_\_  
Complainant Name: \_\_\_\_\_  
Investigator Name: \_\_\_\_\_  
Investigator Work Location: \_\_\_\_\_  
Investigation Completion Due Date: \_\_\_\_\_

### **Section 2 – Previous Investigation**

Has this incident/complaint been investigated previously? \_\_\_\_ Yes \_\_\_\_ No  
[If you answered "no" to this question, go to Section 3.]  
Was the previous investigation conducted with the discrimination charge in mind?  
\_\_\_\_ Yes \_\_\_\_ No  
[If you answered "no" to this question, go to Section 3.]  
Did the previous investigation result in a finding that discrimination was involved?  
\_\_\_\_ Yes \_\_\_\_ No  
Please explain why discrimination was not involved, if not previously documented:

---

---

---

### **Section 3 – Investigation**

Date & time of incident: \_\_\_\_\_  
Names, ID (if applicable) and title of employee accused of discrimination.

Name: _____	Title: _____	ID# _____
Name: _____	Title: _____	ID# _____
Name: _____	Title: _____	ID# _____

Location of incident (including vehicle information): \_\_\_\_\_  
\_\_\_\_\_

Was there a determination that discrimination was involved? \_\_\_\_ Yes \_\_\_\_ No

If yes, what corrective action was taken?

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If it was determined there was no discrimination, how was that determination made?

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Was the complainant contacted? \_\_\_\_ Yes \_\_\_\_ No  
If yes, was complainant satisfied with the resolution of the issue/incident?  
\_\_\_\_ Yes \_\_\_\_ No \_\_\_\_ Unknown

## Title VI Complaint Procedures

If you believe that you have received discriminatory treatment based on race, color or national origin with regard to transit services delivery, you have the right to file a Title VI complaint with the Authority's Civil Rights Administrator within one-hundred and eighty (180) calendar days of the last alleged incident. You may download a complaint form by visiting [www.countyconnection.com](http://www.countyconnection.com). You may also call customer service and ask for a Title VI complaint form to be mailed to you. You may also submit a written statement that contains all the information listed below. Complaints should be mailed or delivered to:

County Connection  
Civil Rights Administrator  
2477 Arnold Industrial Way  
Concord, CA 94520

All complaints should include the following information:

1. Name, address, and telephone number of the complainant.
2. The basis of the complaint; (e.g., race, color, or national origin).
3. The date(s) on which the alleged discriminatory event occurred.
4. The nature of the incident that led the complainant to feel discrimination was a factor.
5. Names, addresses and telephone numbers of persons who may have knowledge of the event.
6. Other agencies or courts where complaint may have been filed and a contact name.

**Central Contra Costa Transit Authority  
Title VI Complaint Form**

Please provide the following information necessary in order to process your complaint.  
Assistance is available upon request. Complete this form and mail or deliver to: CCCTA  
Director of Recruitment & Employee Development, 2477 Arnold Industrial Way, Concord,  
California, 94520.

1) Complainant's Name: \_\_\_\_\_

2) Address: \_\_\_\_\_

3) City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

4) Phone: Home \_\_\_\_\_ Cell \_\_\_\_\_

5) Person discriminated against (if other than complainant)

Name: \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

6) What was the discrimination based on? (Check all that apply):

Race

Color

National Origin

7) Date of incident resulting in discrimination: \_\_\_\_\_

8) Describe how you were discriminated against. What happened and who was responsible?

For additional space, attach additional sheets of paper.



9) Did you file this complaint with another federal, state, or local agency; or with a federal or state court? (check appropriate space)

Yes \_\_\_\_\_

No \_\_\_\_\_

If answer is Yes, then check each agency complaint was filed with:

Federal Agency \_\_\_\_\_ Federal Court \_\_\_\_\_ State Agency \_\_\_\_\_

State Court \_\_\_\_\_ Local Agency \_\_\_\_\_

10) Provide contact person information for the agency you also filed with complaint with:

Name: \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

Date Filed: \_\_\_\_\_

Sign the complaint in the space below. Attach any documents you believe supports your complaint.

\_\_\_\_\_  
Complainant's Signature

\_\_\_\_\_  
Date

Note: A complaint also may be filed with: Federal Transit Administration, Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor – TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.

Si usted cree que ha recibido un trato discriminatorio basado en raza, color u origen nacional con respecto a la prestación de servicios de tránsito, usted tiene el derecho de presentar una queja del título VI con el administrador de los derechos civiles de la autoridad dentro de ciento ochenta (180) días naturales del último incidente presunto. Usted puede descargar un formulario de queja visitando [www.countyconnection.com](http://www.countyconnection.com). También puede presentar una declaración por escrito que contiene todos los datos que se indican a continuación. Las quejas deben ser enviadas por correo o entregarse en:

County Connection  
Civil Rights Administrator  
2477 Arnold Industrial Way  
Concord, CA 94520

Todas las quejas deben incluir la siguiente información:

1. Nombre, dirección y número telefónico del reclamante.
2. La base de la queja; (raza, color u origen nacional).
3. La fecha (s) en que la supuesta discriminación ocurrió.
4. La naturaleza del incidente que llevó al reclamante a sentir la discriminación fue un factor.
5. Direcciones de nombres y números telefónicos de personas que pudieran tener conocimiento del evento.
6. Otros organismos o tribunales donde la queja se puede haber archivado y un nombre de contacto.

**Formulario de queja del Título VI de la autoridad de  
tránsito de Contra Costa Central**

Proporcione la siguiente información necesaria para procesar su queja. Contamos con asistencia disponible a solicitud. Complete este formulario y envíelo por correo o entréguelo en: CCCTA Director of Recruitment & Employee Development, 2477 Arnold Industrial Way, Concord, California, 94520.

- 1) Nombre del demandante: \_\_\_\_\_
- 2) Dirección: \_\_\_\_\_
- 3) Ciudad: \_\_\_\_\_ Estado: \_\_\_\_\_ Código postal: \_\_\_\_\_
- 4) Teléfono: Casa \_\_\_\_\_ Celular \_\_\_\_\_
- 5) Persona contra la que se ha discriminado (si no es el demandante)  
Nombre: \_\_\_\_\_  
Dirección: \_\_\_\_\_  
Ciudad: \_\_\_\_\_ Estado: \_\_\_\_\_ Código postal: \_\_\_\_\_
- 6) ¿En qué se basa la discriminación? (marque todas las que correspondan):  
Raza  
Color  
País de origen
- 7) Fecha del incidente que tuvo como resultado la discriminación: \_\_\_\_\_
- 8) Describa cómo se le discriminó. ¿Qué ocurrió o quién fue responsable? Para tener más espacio, adjunte hojas adicionales o use el reverso de este formulario.

9) ¿Presentó esta queja ante otra agencia federal, estatal o local o ante un tribunal federal o estatal? (marque el espacio correspondiente)

Sí \_\_\_\_\_

No \_\_\_\_\_

Si la respuesta es sí, verifique con cada agencia con la que se presentó la queja:

Agencia federal \_\_\_\_\_ Tribunal federal \_\_\_\_\_ Agencia del estado \_\_\_\_\_

Tribunal del estado \_\_\_\_\_ Agencia local \_\_\_\_\_

Proporcione la información de la persona de contacto de la agencia con la que también presentó la queja: Nombre: \_\_\_\_\_

Dirección: \_\_\_\_\_

Ciudad: \_\_\_\_\_ Estado: \_\_\_\_\_ Código postal: \_\_\_\_\_

Fecha en que se presentó: \_\_\_\_\_

Firme la queja en el espacio a continuación. Adjunte todos los documentos que considere que respaldan su queja.

---

Firma de la persona que presenta la queja

Fecha

Nota: Una queja también puede presentarse a: Federal Transit Administration, Office of Civil Rights, Atención: Title VI Program Coordinator, East Building, 5th Floor – TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.

## C. PUBLIC PARTICIPATION PLAN

### Purpose of the Public Participation Plan

Public participation is the process through which stakeholders can partake directly in agency decision making, and express their concerns, desires, and values. County Connection's planning process and the Public Participation Plan (PPP) serves as a roadmap to ensure the public has sufficient access to information and can provide meaningful input into decisions made regarding the future of transit service in Central Contra Costa County.

This document will discuss the strategies used to attain feedback from the public. This plan is to be used when County Connection embarks upon service planning activities or other undertakings wherein public participation plays a critical role in a successful outcome.

### Title VI

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 this group has adequate access to the agency's programs and activities, meaning that public participation opportunities should also be accessible to those who have a limited understanding of English (spoken and/or written).

### Executive Order 12898

The PPP has been designed to be inclusive of all populations in County Connection's service area and includes a detailed public participation process, clear goals, and a variety of public participation methods to provide information and invite the public to give input throughout decision-making processes, and performance measures and objectives.

### Purpose of the PPP:

1. To inform the public about transportation issues and planning processes
2. To establish the process through which the public can express concerns, desires, and values
3. To reach a wide range of residents and workers, and increase the participation of under-represented populations

4. To ensure County Connection's programs and activities reflect the community values
5. To improve service outcomes based on public input

## **Public Participation Strategies**

The following section includes strategies for ensuring the public has access to information necessary to participate in future County Connection planning and policy development efforts, including all fare changes and major service changes. In designing outreach and public strategies, County Connection uses traditional and social media, and other tools such as the following.

### **Outreach Tools**

#### **1. Radio, Television, Newspaper**

Publicizing public participation opportunities and outreach information through newspapers that serve both English-speaking and language-specific audiences can help spread the word about these events.

#### **2. Web Resources**

Currently, County Connection posts notices and announcements on the agency's website ([www.countyconnection.com](http://www.countyconnection.com)), Facebook, Twitter, Instagram, and Nextdoor and can send information via e-mail and text to customers on an opt-in basis.

Social media has gained prominence in the past decade and is often a faster means of conveying news than traditional media. Facebook, Twitter, Instagram, Nextdoor, and others are all potential outlets through which County Connection reaches the public. Social media is relatively easy to use and is also less costly than other strategies.

#### **3. On-Board Information Resources**

Many riders and community members can access information about public participation methods pertaining to projects or service plans at BART stations as well as libraries, senior centers, and colleges within the service area. County Connection also provides written and printed information on buses as an efficient way to convey messages about potential service or fare changes, or other planning efforts. Destination signs can also provide information that is easily seen by the community. County Connection also uses internal electronic message signs and audio announcements.

#### **4. Customer Service**

The public can call in to the call center both to receive information and to give comments and input. The customer service number is always provided on County Connection materials. Staff in the customer service call center has full-time access to a telephone translation service covering the full range of languages.

#### **5. Print Materials**

In addition to on-board printed information, County Connection publicizes public participation opportunities and outreach information via print materials (such as newsletters, flyers, and other direct mail materials). This method of outreach can be expensive but effective. Crucial information must be translated into the languages identified as spoken and/or written by the target populations. If all information cannot be translated, notices can describe where to obtain translations/interpretations.

#### **6. Surveys**

County Connection conducts a statistically valid on-board survey of passengers every three years. Issue-specific surveys may be used in certain circumstances. Surveys can be conducted in person or through the telephone, pen and paper, and/or online means. Printed surveys may have a low response rate. Telephone surveys may be more effective but are often costly. Internet surveys are the easiest of the three options for the agency to conduct, but only reach those with internet access, which may skew the results. Any survey must include adequate and appropriate translations.

County Connection's most recent on-board survey was conducted in person using handheld tablet devices on which the online survey was administered. This method provides the benefits of an online survey format, which can provide logic and validation to ensure accurate and complete responses, but does not require the participant to have internet access, which results in a more representative sample.

#### **7. Interviews**

In certain contexts, County Connection staff will interview specific stakeholders to collect information or gain insight on their perspectives.

#### **8. Community-Based Organizations**

CBOs play an important role in public participation. County Connection works with a variety of CBOs, including: ethnic cultural centers; churches and faith-based organizations; geographic-specific such as tenant associations; neighborhood and community groups; civic groups; business

organizations; educational facilities including schools providing English as a Second Language programs; service providers for children, youth, families and persons with disabilities; recreation; environmental; political; youth- and senior-oriented organizations; and many others. Staff work closely with the CBOs to schedule and conduct outreach. The following lists CBOs that County Connection utilizes for outreach.

#### Community Based Organizations

Organization	Address	City	Title VI Group
Monument Corridor Transportation Action Team	1760 Clayton Rd.	Concord	Low-income, minority
The Interfaith Council of Contra Costa County	1543 Sunnyvale Ave.	Walnut Creek	Low-income, minority
Martinez Senior Community Center	818 Green St.	Martinez	Low-income, minority
Los Rancheros Market	1099 Reganti Drive	Concord	Hispanic
La Clínica Monument	2000 Sierra Road	Concord	Hispanic
Envirojustice	2520 Pine St.	Martinez	Low-income, minority
Boys and Girls Club	1301 Alhambra Ave. 1001 Stoneman Ave.	Martinez Pittsburg	Low-income, minority
Contra Costa Child Care Council	1035 Detroit Ave.	Concord	Low-income, minority
Community Development Division	651 Pine St. 5th Floor	Martinez	Low-income, minority
Contra Costa County Employment and Human Services Dept.	40 Douglas Dr.	Martinez	Low-income, minority
Contra Costa County Workforce Development Board	300 Elinwood Way	Pleasant Hill	Low-income, minority
Contra Costa Health Services	50 Douglas Dr.	Martinez	Low-income, minority



Organization	Address	City	Title VI Group
Contra Costa Interfaith Supporting Community Organization (CCISCO)	724 Ferry St.	Martinez	Low-income, minority
Concord Family Service Center	2120 Diamond Boulevard, Suite 220	Concord	Low-income, minority
Concord Senior Center	2727 Parkside Circle	Concord	Low-income, minority
Monument Impact	2699 Monument Blvd	Concord	Low-income, minority
Monument Crisis Center	1990 Market St	Concord	Low-income, minority

## 9. Public Meetings

Public meetings are a way to give out information to a broad segment of the population as well as receive feedback on planning efforts. Such meetings are broadly advertised and open to all stakeholder groups and interested individuals.

Public hearings are the most formal method of public meetings, in which official statements are presented by individual attendees and their comments are recorded. Time limits are often necessary to permit all interested participants to speak. Public hearings allow each individual's perspectives and opinions to be heard by all in attendance. The primary drawback of an official public hearing is that interaction with the public is limited and the structure can be intimidating.

An open house format allows participants to receive information at their own pace, with no strict time period in which they have to arrive at and leave from the location. Information stations can include tabletop displays, maps, photographs, visualizations, and more. Staff is on hand to respond to questions and comments. Because open houses are more informal, disorganization can occur and not everyone's comments may be conveyed or heard. There is often little interaction among participants. Some open houses may include an educational presentation and comment period.

As newspaper readership has fallen, social media has become an ever-growing tool for spreading news and announcements. County Connection frequently updates its Facebook, Twitter, and

website while still releasing bilingual newspaper notices. There is also a Customer Service Center that customers and the general public can call to voice opinions.

Workshops have also been used, allowing for a more hands-on approach than focus group meetings. These public meetings allow for specific groups to directly talk to staff and voice their concerns.

County Connection will utilize various methods of public outreach to ensure that as much participations as possible within target populations are aware of any opportunities for providing input on planning and policy development efforts.

## **10. Public Hearings**

The County Connection Board of Directors adopted a Public Hearing Policy on October 16, 2008 to govern public hearing procedures. In April 2015, the policy was amended to include additional ways to solicit and consider public comments.

All public hearings are to be called by the Board of Directors. However, when authorized by the Chair, the General Manager may call a public hearing that is required by law or by Authority policy when doing so would move the process forward in a timely manner.

### Necessity of a Public Hearing

The Board may call a public hearing for a variety of reasons. However, prior to implementing a new fare, raising an existing fare, or implementing a major reduction in service, the Authority shall hold a public hearing at which oral and written presentation can be made as part of a duly noticed meeting.

Major reduction in service is defined as:

1. Elimination of 25 percent or more of the number of transit route miles of a bus route; or
2. Elimination of 25 percent or more of the number of daily transit revenue miles of a bus route for the day of the week for which the change is made; or
3. Elimination of service that affects 25 percent or more of daily passenger trips of a bus route for the day of the week for which the change is made.

### Notice

Notice of the time and place of the meeting shall be published twice in a newspaper that is regularly published at least once a week. As a general rule, the first notice should be published at least 21 days

prior to the hearing and the second notice at least 5 days prior to the last hearing date. Shorter notice may be given when financial, operational or scheduling considerations make it infeasible to provide 21 days' advance notice. At a minimum, the notice must be published at least 10 days prior to the hearing and the second notice at least 5 days prior to the last hearing date.

The notice shall include a general, brief explanation of the matter to be considered. The notice shall also state where and when the staff report or other information about the subject of the hearing will be available for public review.

If specific groups or neighborhoods would be affected by the change, the Authority shall use best efforts to publish the notice in newspapers, if any, oriented to such groups or neighborhoods and to otherwise publicize the hearing to reach such groups or neighborhoods, including publicizing the hearing on the Authority's web site.

#### Conduct of the Public Hearing

At the public hearing, the Authority shall afford any interested person or duly authorized representative, or both, the opportunity to present statements or arguments. Limitations may be established on the length of oral presentations in order to afford all members of the public a reasonable opportunity to speak. The hearing need not be conducted according to the technical rules of evidence. Such hearing may be conducted by staff. Generally, court reporters will not be used. At the close of the public hearing, the General Manager or his/her designee will announce where the item will next be heard, either before a committee or the Board.

#### Other Public Comments

Staff may solicit public comments on the proposed major service change or fare change using other methods in addition to the required public hearing, such as email, phone calls to customer service, mobile apps that collect passenger comments or conduct surveys, blog posts, and workshops.

#### Consideration of Comments

All comments received will be summarized and presented to the Board for their consideration as part of the decision making process.

## D. 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 a County Connection service.

**Factor 2:** The frequency with which LEP persons come in contact with County Connection services.

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

**Factor 4:** The resources available to County Connection and overall cost to provide LEP assistance.

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

### Purposes 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 "restrict[ing] 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 "utiliz[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.”

FTA Circular 4702.1B 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 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. Given the diversity of Contra Costa County’s population and County Connection’s ridership, it is critical to provide language assistance. County Connection’s LAP complies with the requirements of DOT LEP guidance.

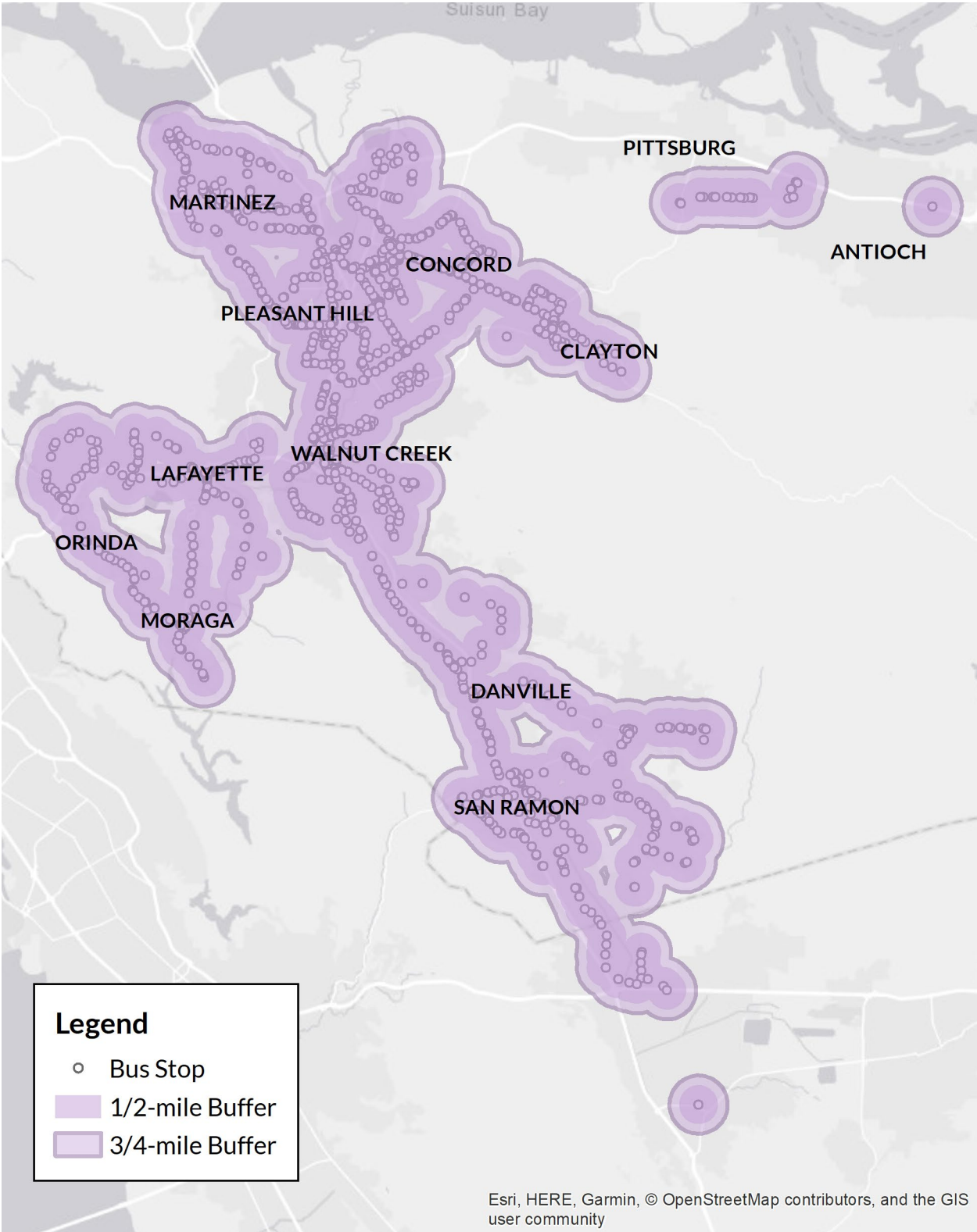
## Four Factor Analysis

### Factor 1:

**The number or proportion of LEP persons in the service area who may be served or are likely to encounter a County Connection service.**

The first step in the Language Assistance Plan development process is to quantify the number of persons in the service area who do not speak English fluently and would benefit from the Language Assistance Plan. The following exhibit illustrates County Connection’s current fixed-route system map along with a ½- and ¾-mile boundaries corresponding with the reasonable distance a customer could be expected to walk to access a County Connection bus.

Bus Stop Walking Distance



### Analysis of Census Data

To identify the concentrations of LEP populations within County Connection's service area, staff analyzed Census data from the American Community Survey (ACS) 2014-2018 5-year Estimates.

Since the last Program Report, there was a change in how the ACS categorizes and aggregates language data due to privacy concerns and small sample sizes. In particular, Census Tract-level summary data has been reduced to reflect the most commonly spoken languages in the United States, and certain groups of spoken languages are now aggregated. Because of this, additional analysis was performed using Public Use Microsample (PUMS) data from the same ACS dataset to provide more detailed breakdowns of language groups. However, due to the more detailed nature of this microdata, it is only available for larger geographic areas, which do not correspond exactly with the Census Tracts that comprise County Connection's service area.

In developing this Language Assistance Plan, County Connection paid particular attention to the Federal Department of Justice (DOJ) guidelines regarding the "Safe Harbor Provision" for translation of written materials. FTA Circular 4702.1B states the following with respect to the Safe Harbor Provision:

*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.*

Based on these guidelines, nine language groups have more than 1,000 persons in Central Contra Costa County who speak English less than “very well” and thus require translation of vital documents:

- Spanish
- Chinese
- Korean
- Persian/Farsi
- Tagalog/Filipino
- Russian
- Vietnamese
- Hindi
- Arabic

The following table illustrates the breakdown by language of residents within County Connection’s service area who speak English “very well” or less than “very well” based on ACS summary data. For the purposes of this analysis, staff focused on those residents indicating the spoke English less than “very well.” There are approximately 70,753 residents within the service area who indicated they speak English less than “very well,” representing over 11 percent of the populace.



## English Proficiency (ACS summary data)

Language or Language Group	Total	Speak English "very well"	Speak English less than "very well"	% Speaking English less than "very well"
Speak only English	443,222	-	-	-
<b>Spanish</b>	78,372	45,342	<b>33,030</b>	<b>5.3%</b>
French, Haitian, or Cajun	2,611	2,305	306	0.0%
German or other West Germanic languages	2,691	2,263	428	0.1%
<b>Russian, Polish, or other Slavic languages <sup>(1)</sup></b>	8,801	5,596	<b>3,205</b>	0.5%
<b>Other Indo-European languages <sup>(1)</sup></b>	28,161	20,385	<b>7,776</b>	1.3%
<b>Chinese (incl. Mandarin, Cantonese)</b>	22,971	12,128	<b>10,843</b>	1.8%
<b>Korean</b>	5,393	2,667	<b>2,726</b>	0.4%
<b>Vietnamese</b>	3,803	1,929	<b>1,874</b>	0.3%
<b>Tagalog (incl. Filipino)</b>	13,880	9,433	<b>4,447</b>	0.7%
<b>Other Asian and Pacific Island languages <sup>(1)</sup></b>	14,873	11,062	<b>3,811</b>	0.6%
<b>Arabic</b>	3,315	2,072	<b>1,243</b>	0.2%
<b>Other and unspecified languages</b>	3,903	2,839	<b>1,064</b>	0.2%
<b>Total</b>	<b>631,996</b>	<b>118,021</b>	<b>70,753</b>	<b>11.4%</b>

**Bold** indicates languages or language groups meeting the "Safe Harbor" criteria

(1) Language group was further analyzed using PUMS data

Source: U.S. Census Bureau, 2014-2018 American Community Survey, Table C16001

As mentioned previously, recent changes to the ACS tables resulted in more languages being grouped together on the Census Tract level, making it difficult to distinguish which specific language(s) meet the "Safe Harbor" criteria. In particular, Persian (Farsi) has historically been

identified as a “Safe Harbor” language but is now grouped under “Other Indo-European languages”, and Russian is grouped with Polish and other Slavic languages. Thus, PUMS data was analyzed to provide a more detailed breakdown by individual language. The following table shows the languages that meet the “Safe Harbor” criteria based on PUMS data.

#### English Proficiency (PUMS data)

Language	Total	Speak English "very well"	Speak English less than "very well"	% Speaking English less than "very well"
Speak only English	379,808	-	-	-
Spanish	43,093	24,828	18,265	3.5%
Chinese (incl. Mandarin, Cantonese)	19,894	10,731	9,163	1.8%
Korean	5,158	2,391	2,767	0.5%
Farsi	7,305	4,554	2,751	0.5%
Tagalog (incl. Filipino)	8,193	5,634	2,559	0.5%
Russian	5,758	3,815	1,943	0.4%
Vietnamese	3,090	1,836	1,254	0.2%
Hindi	6,321	5,119	1,202	0.2%
<i>Other languages</i>	37,092	27,931	9,161	1.8%
<b>Total</b>	<b>515,712</b>	<b>86,839</b>	<b>49,065</b>	<b>9.5%</b>

Source: U.S. Census Bureau, 2014-2018 American Community Survey, Public Use Microdata Sample (PUMS)

While some of these groups represent a modest percentage of County Connection’s Service Area population, they do constitute a count of at least 1,000 persons and thus qualify based on the Safe Harbor Provision. It is County Connection’s responsibility to ensure these groups have access to vital documents translated into their language so they can participate in a meaningful way in County Connection’s decision-making process and stay informed regarding County Connection’s business activities. “Vital” written documents include Title VI complaint forms, procedures, notices. These

documents must be translated into the identified languages from Factor One and Factor Two in the next section for Title VI compliance.

County Connection currently translates most materials into Spanish, which is the only language group constituting a share of more than 5 percent of the population.

#### California Department of Education

In addition to Census data, the Factor 1 analysis considered language data from the California Department of Education (CDE) English Learners Database. Although this data is limited to students and not necessarily reflective of the population as a whole, it provides another means of cross-checking the census data analysis.

The following table provides a breakdown of the languages that are spoken at home by more than 100 English Learners within County Connection's service area. The most common languages are consistent with those identified previously as "Safe Harbor" languages.

#### English Learners by Language Spoken at Home

Language	English Learners	% of Total Enrollment
Spanish	5,681	6.4%
Mandarin (Putonghua)	432	0.5%
Farsi (Persian)	278	0.3%
Russian	271	0.3%
Arabic	191	0.2%
Korean	180	0.2%
Filipino (Pilipino or Tagalog)	159	0.2%
Telugu	146	0.2%
Cantonese	143	0.2%
Vietnamese	124	0.1%
Hindi	108	0.1%

Language	English Learners	% of Total Enrollment
Portuguese	101	0.1%
Other languages	1,186	1.3%
<b>TOTAL</b>	<b>9,000</b>	<b>10.1%</b>

Source: California Department of Education, 2019-20 English Learners by Grade & Language

## Factor 2:

### **The frequency with which LEP persons come in contact with County Connection services.**

The second step in the analysis is an evaluation of the current frequency of contact between LEP individuals and County Connection's services. This includes a survey of key program areas and major points of contact with the public, such as use of bus service, customer service interactions, and at public meetings.

#### Participation in Public Meetings

During the reporting period, County Connection has held 12 public meetings, in addition to regularly scheduled Board and subcommittee meetings. No individual has requested either an interpreter for a language other than Spanish nor expressed interest in commenting in a language other than English or Spanish.

#### Call Center

To supplement information gathered via the U.S. Census, County Connection analyzed the number of calls coming through its call center which occurred in a language other than English. In 2019, 41,641 total calls were answered. Of calls answered, 39 calls were interpreted via language line call services, with the majority (56 percent) to Spanish. Interpreted calls, however, only represent less than one-tenth of one percent of all calls received and have been decreasing in recent years due to customer service representatives who have been hired with bilingual Spanish proficiency.

**Call Center Translation Data**

Language	Number of Calls Interpreted in 2019
Spanish	22
Arabic	7
Farsi	5
Mandarin	2
Russian	1
Taishanese	1
Amharic	1
<b>Total</b>	<b>39</b>

Customer Survey

County Connection conducts a comprehensive survey of its customers across every route in the system every three years. The most recent survey was conducted in October 2019 and asked riders what language they speak at home and how well they speak English. It is critical to note the triennial survey is focused entirely on customers while the Census tracks all county residents. Not only does the survey capture only those who are bus riders, but it also captures those who may live outside of Central Contra Costa County.

The following table shows a breakdown of the survey responses regarding English proficiency. In the survey, 95% of the riding public surveyed stated that they speak only English or that they speak English “very well”. Of the respondents who speak English less than “very well”, just over half speak Spanish.

## English Proficiency of Riders

Language	Total	Speak English "very well"	Speak English less than "very well"	% Speaking English less than "very well"
Speak only English	828	-	-	-
Spanish	198	168	30	2.6%
Chinese	30	23	7	0.6%
Tagalog/Filipino	24	22	2	0.2%
Japanese	18	9	9	0.8%
Hindi	13	10	3	0.3%
Persian/Farsi	7	5	2	0.2%
Russian	6	5	1	0.1%
Arabic	5	4	1	0.1%
<i>Other languages</i>	44	40	4	0.3%
<b>Total</b>	<b>1,173</b>	<b>286</b>	<b>59</b>	<b>5.0%</b>

Source: 2019 County Connection On-Board Transit Survey

## Factor 3:

**The nature and importance of services provided by County Connection to the LEP population.**

There are a number of key interaction points with the bus system which could prove problematic for LEP populations:

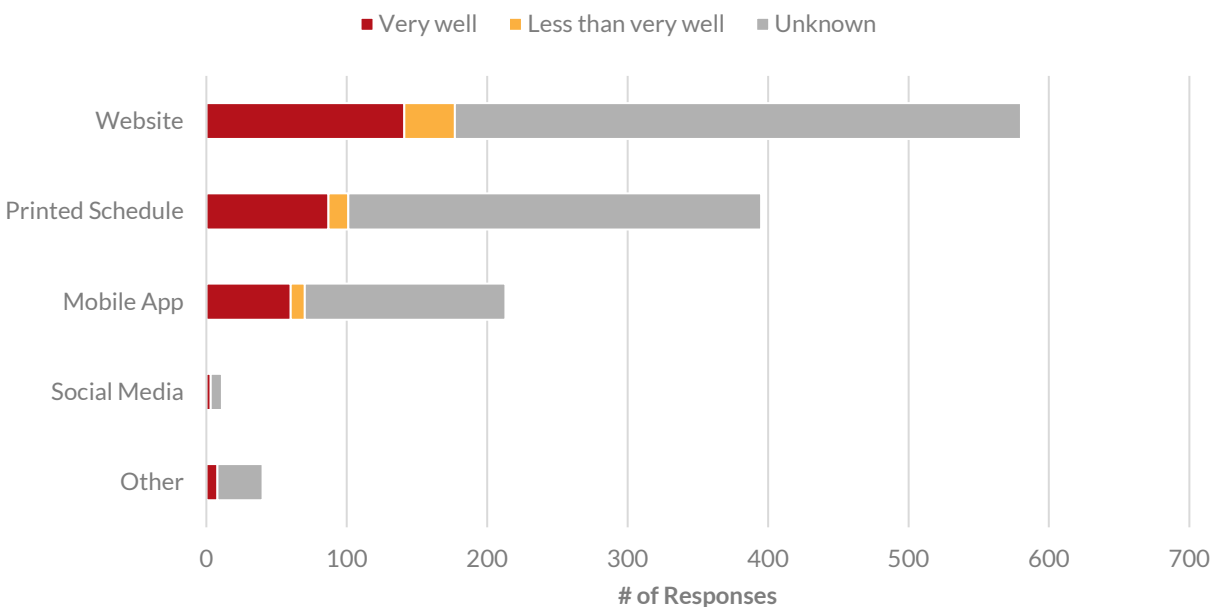
- County Connection website
- County Connection customer service phone line
- Bus stop signage
- Printed schedules
- Fare payment
- Driver inquiries
- Onboard announcements

- Social media posts
- Other printed materials

Ensuring that critical information at these interaction points is available in languages commonly spoken is crucial to providing equitable access to County Connection bus service for LEP populations.

The following chart summarizes how riders receive information relating to County Connection’s services by English proficiency based on the most recent passenger survey. The website and printed schedules are the main sources of information for riders, although the website is more strongly preferred among those who speak English less than “very well”.

Information Sources by English Proficiency



While County Connection Customer Service personnel have access to interpretation services and the County Connection website has a tool allowing the website’s content to be translated into more than 70 different languages, much of the critical information onboard buses and at the bus stops is not available in many of the languages identified in this document through the Census data and customer surveys.

Opportunities for Improvement

Currently County Connection disseminates all information in English, with most information also available in Spanish. Select materials are also available in Chinese. Customer service personnel all speak English, with some speaking Spanish.

Given that as many as nine different languages fall within the federal “Safe Harbor” guidelines, County Connection has translated vital materials into the following languages:

- Spanish
- Chinese
- Korean
- Persian/Farsi
- Tagalog/Filipino
- Russian
- Vietnamese
- Hindi
- Arabic

With respect to other languages represented by fewer residents, County Connection currently meets basic requirements for access to information via the Customer Service Language Line and County Connection website translation tool.

Despite the efforts to ensure access to information about its bus service among LEP populations, some key improvements can be made:

- Take into consideration that, according to a local Filipino newspaper, Filipinos may prefer to read materials in English rather than Tagalog.
- Representing Google Translate options on the County Connection website in each respective language rather than listing them all in English. It should also be noted that FTA does not consider Google Translate as a sufficient translation tool for vital documents.
- Locate the Google Translate tool on the County Connection website in a more prominent location (currently located at the bottom right corner of each page).



- Translate printed information disseminated to the public into more languages (currently only translated into Spanish, aside from vital documents). This could include targeted materials for communities in which other languages are commonly spoken.
- Include a standard statement at the bottom of each publication and on certain web pages of the phrase "For information, call 925-676-7500" translated into each safe harbor language.
- Advertise in more media outlets that target languages other than English and Spanish.
- Translate information about fare payment and pass sales into more languages than English and Spanish, and/or use symbols to illustrate key ideas.
- Improve communication with targeted organizations such as Community-Based Organizations (CBOs), Parent Teacher Organizations (PTOs), and schools to ensure that more LEP individuals participate in outreach efforts.
- Provide more bus rider presentations to various organizations, such as CBOs.
- Increase marketing efforts to include social media and traditional media (in various languages) to increase LEP participation at informational outreach events. The placement of multi-language printed materials at bus stops and on buses may be especially critical toward improving information accessibility.

#### Factor 4:

##### **The resources available to County Connection and overall cost to provide LEP assistance.**

County Connection currently has the following language assistance measures in place:

- All of the County Connection web pages may be translated using online tools.
- Customer service staff is trained on how to use the telephone language line for over-the-phone, real-time interpretation services.
- County Connection provides bilingual (Spanish-speaking) staff at public hearings and neighborhood meetings.
- The Customer Service staff for both telephone and in-person assistance includes bilingual (Spanish-speaking) staff.
- All public timetables include a note in Spanish on how to use the language line to get transit information.

- System maps and riders guides are printed in both English and Spanish.

County Connection's Operating Budget does not have a specific line item for providing language access and outreach; costs for interpreters and outsourcing translation needs are split among several different departments depending on which department is responsible for the outreach project being undertaken. Typical annual expenses across all departments are as follows:

- Translation/Interpretation: \$1,500
- Schedules/Graphics: \$70,000
- Market research: \$55,000 every three years

Translated documents include ad cards, direct mailers, bus stop signs, customer brochures, meeting notices, and other customer outreach materials like construction-related notices and information pieces. Most translation is into Spanish, which covers the majority of County Connection's customer base. Materials are translated into additional languages – such as Chinese, Russian, Vietnamese and the other “Safe Harbor” languages as resources allow and circumstances dictate.

County Connection needs additional services to provide more meaningful access to LEP groups. The following are recommendations that can be implemented during the next three years:

- Increased use of universal pictograms at bus stops and on buses.
- Increased translations of documents.
- Conduct more language-specific outreach.
- Provide a short survey regarding LEP needs on buses in various languages for LEP individuals who cannot make it to outreach meetings, where these individuals can voice their concerns and opinions directly to County Connection staff.

## Language Assistance Implementation Plan

### Methodologies

#### Identifying LEP Individuals

*“There should be an assessment of the number or proportion of LEP individuals eligible to be served or encountered and the frequency of encounters pursuant to the first two factors in the four-factor analysis...”*

*-DOT LEP Guidance Section VII(1)*

As indicated in the analyses provided in Factors One and Two in the previous section, there is substantial evidence that there is a significant LEP population within County Connection’s service area.

This population also makes up a considerable portion of County Connection’s customers. County Connection analyzed Census data from 2018 and found that approximately 70,000 residents indicated that they speak English less than “very well,” or 11 percent of the service area population. Nine language groups (Spanish, Chinese, Korean, Persian/Farsi, Tagalog/Filipino, Russian, Vietnamese, Hindi, and Arabic) have more than 1,000 persons who speak English less than “very well” and require a translation of vital documents. Currently County Connection’s only consistently translates most materials into Spanish.

#### Providing Services

*“An effective LEP plan would likely include information about the ways in which language assistance will be provided.”*

*-DOT LEP Guidance Section VII(2)*

County Connection is committed to providing meaningful access to information and services to its LEP customers. Currently County Connection language assistance tools include and are not limited to:

- Google Translate tool on County Connection’s website
- Interpreters (by request) for public hearings
- Multilingual printed materials

- Language Line (for customer service representatives and dispatch personnel to assist passengers using requested language)
- County Connection customer service line

There are additional resources such as mobile devices and bilingual staff that provide language assistance to LEP customers, but these are not formally tracked.

Improvements can always be made, and the following are language assistance services that may be provided in the future:

- Improve Google Translate tool to display languages in their original written form (rather than in English) and placing the tool in a more prominent location on the County Connection website.
- Translate more languages in general.
- Make more multilingual social media posts.
- Continue partnering with CBOs to serve more multilingual communities.
- Continue partnering with regional agencies and other partners to produce shared multilingual customer information materials.
- Review existing customer information documents to determine whether the document is “vital” and what level of translation is needed.
- Review current translation, interpretation and language assistance efforts to determine whether they are adequate and/or effective.

“Vital” written documents include complaint forms, written notices of important legal rights, documents that are critical for obtaining services and benefits, documents identifying upcoming fare and service changes, and notices advising LEP individuals of free language assistance. These documents must be translated into the identified languages from Factor One and Factor Two in the previous section for Title VI compliance. County Connection has translated the following vital documents into the nine “Safe Harbor” languages identified in the analysis:

- Title VI Public Notice,
- Title VI Complaint Procedures, and
- Title VI Complaint Form.

Translations of these documents are available on County Connection's website at <https://countyconnection.com/how-to-ride/civil-rights/>.

### Monitoring

*"Recipients should, where appropriate, have a process for determining, on an ongoing basis, whether new documents, programs, services, and activities need to be made accessible for LEP individuals, and they may want to provide notice of any changes in services to the LEP public and to employees."*

*-DOT LEP Guidance Section VII(5)*

County Connection will monitor on an ongoing basis activities and information that require LEP accessibility. Monitoring methods include:

- Assess new customer information documents prior to production to determine whether the document is "vital" and what level of translation is needed.
- Assess and analyze outreach efforts pertaining to LEP populations.
- Analyze newly available demographic data from the U.S. Census, the ACS, and customer surveys.
- Gather information from CBOs and regional agencies and partners to stay current.
- Analyze data from ridership surveys every three years.

### Recommendations for Implementation

County Connection recognizes the importance of providing adequate accessibility for LEP customers to County Connection services and information. While County Connection currently complies with all federal and state mandates in regards to Title VI and other requirements, more can be done to ensure that LEP populations are provided with the transit services they need and to ensure the communities are satisfied with such services.

Moving forward, County Connection will:

- Expand coordination and partnerships with CBOs, schools, and other organizations to more effectively reach LEP populations.

- Work with Google or other outside translation service(s) to improve County Connection website translations.
- Utilize symbols and other non-written forms of communication to allow for important information to be disseminated to those who are LEP.

## **E. BOARD MEETING MINUTES, RESOLUTIONS**

Board Resolutions for the FTA required standards and policies are included below. Additionally, the Board minutes and resolution for this Title VI Program Report will be included upon adoption.

## **RESOLUTION NO. 2013-019**

### **Central Contra Costa Transit Authority**

#### **Board of Directors**

\*\*\*

#### **Adoption of Major Service Change, Disparate Impact, and Disproportionate Burden policies required for compliance with Title VI of the Civil Rights Act of 1964**

**WHEREAS**, the County of Contra Costa and the Cities of Clayton, Concord, the Town of Danville, Lafayette, Martinez, the Town of Moraga, Orinda, Pleasant Hill, San Ramon and Walnut Creek (hereinafter "Member Jurisdictions") have formed the Central Contra Costa Transit Authority ("CCCTA"), a joint exercise of powers agency created under California Government Code Section 6500 et seq., for the joint exercise of certain powers to provide coordinated and integrated public transportation services within the area of its Member Jurisdictions; and

**WHEREAS**, Title VI of the Civil Rights Act of 1964 requires recipients of Federal grants and other federal financial assistance to operate their programs and services in a nondiscriminatory manner without regard to, race, color or national origin; and

**WHEREAS**, the Federal Transit Administration (FTA) issued Circular FTA C 4702.1B, effective October 1, 2012, setting forth requirements and guidelines for Title VI compliance; and

**WHEREAS**, as set forth in the above-referenced Circular, the Board of Directors is required to adopt policies to guide the equitable distribution of County Connection services; and

**WHEREAS**, the County Connection is also required to adopt policies to define when a service change is sufficiently broad or large to necessitate a review of its potential impacts on minority and low-income populations, and to define when a fare change or major service change will have a disparate impact on minority populations or impose a disproportionate burden on low-income populations, all of which policies and definitions are required to be subject to public input; and

**WHEREAS**, over the past three months, staff has presented draft policies to the Marketing, Planning, and Legislative Committee and the public through public meetings, and accepted public comment on the policies; and

**WHEREAS**, the General Manager recommends the Board approve the attached definition of "Major Service Change," and Disparate Impact and Disproportionate Burden policies, which comply with FTA requirements and which will guide future decisions regarding and monitoring of County Connection programs and services to ensure they are provided equitably, without discrimination based on race, color or national origin.

**NOW, THEREFORE, BE IT RESOLVED** the Board of Directors of the Central Contra Costa Transit Authority hereby approves the attached definition of "Major Service Change," and Disparate Impact and Disproportionate Burden policies.

Regularly passed and adopted this 20th day of June, 2013 by the following vote:



AYES: Directors Andersen, Haskew, Horn, Hoffmeister, Manning, Schroder and Worth

NOES: Directors Dessayer and Weir

ABSTENTIONS: None

ABSENT: Directors Hudson and Storer

  
Erling Horn, Chair, Board of Directors

ATTEST:

  
\_\_\_\_\_

Lathina Hill, Clerk to the Board

RESOLUTION NO. 2015-014

CENTRAL CONTRA COSTA TRANSIT AUTHORITY  
BOARD OF DIRECTORS

\* \* \*

AUTHORIZING ADOPTION OF SYSTEM-WIDE  
SERVICE STANDARDS AND POLICIES  
AS REQUIRED BY TITLE VI GUIDELINES

WHEREAS, the County of Contra Costa and the Cities of Clayton, Concord, the Town of Danville, Lafayette, Martinez, the Town of Moraga, Orinda, Pleasant Hill, San Ramon and Walnut Creek (hereinafter "Member Jurisdictions") have formed the Central Contra Costa Transit Authority ("County Connection"), a joint exercise of powers agency created under California Government Code Section 6500 et seq., for the joint exercise of certain powers to provide coordinated and integrated public transportation services within the area of its Member Jurisdictions;

WHEREAS, on October 1, 2012, the Federal Transit Administration (FTA) issued a new circular to guide transit agencies and other federal aid recipients in complying with Title VI of the Civil Rights Act of 1964 (Title VI), which ensures that public services, including transportation, are provided in a nondiscriminatory manner;

WHEREAS, in order to comply with the requirements of Title VI and the FTA circular, County Connection must adopt system-wide service standards and policies, and monitor compliance therewith at least once every three years;

WHEREAS, County Connection's next Title VI Program update is due to the FTA in February 2015, which Program must include the results of service monitoring;

WHEREAS, on November 7, 2014, staff presented proposed service standards and policies to the Marketing, Planning and Legislative Committee, which recommended Board of Directors approval of the Service Standards and Policies in the form attached as Attachment A;

WHEREAS, some of the proposed standards and policies reflect existing County Connection policies, some reflect updates to existing policies, and some are entirely new; and,

WHEREAS, to the extent these standards and policies are inconsistent with existing policies, the new standards and policies would supersede existing policies for purposes of Title VI monitoring only.

NOW, THEREFORE, BE IT RESOLVED that the Central Contra Costa Transit Authority Board of Directors hereby adopts the System-wide Service Standards and Policies attached hereto as Attachment A; and

BE IT FURTHER RESOLVED that, to the extent new these standards and policies are inconsistent with existing County Connection policies, the new standards and policies would supersede existing policies for purposes of Title VI monitoring only.

Regularly passed and adopted this 18th day of December, 2014 by the following vote.

AYES: Directors Andersen, Dessayer, Hoffmeister, Manning, Schroder, Simmons,  
Storer, Tatzin and Weir

NOES:

ABSTAIN:

ABSENT: Directors Hudson and Worth

ATTEST:

  
\_\_\_\_\_  
Lathina Hill, Clerk to the Board

  
\_\_\_\_\_  
A.G. Dessayer, Chair, Board of Directors

## F. TITLE VI POLICIES, SERVICE STANDARDS & POLICIES

Federal Title VI requirements of the Civil Rights Act of 1964 were updated by the FTA in 2012 to require each large public transportation provider's governing board to approve five standards and policies:

- Major Service Change Policy
- Disparate Impact Policy
- Disproportionate Burden Policy
- System-wide Service Standards
- System-wide Service Policies

These standards and policies were developed to ensure that service is provided in a manner that does not discriminate on the basis of race, color, or national origin. The first policy defines "major service change" as a threshold for when an agency will conduct a thorough analysis of the potential effects of service changes on protected populations. For the second and third policies, agencies are required to define thresholds for when they will find that a fare change or major service change will result in a "disparate impact" on the minority population or a "disproportionate burden" on the low-income population. The last two policies define system-wide service standards and policies to be used to ensure that service and amenities are distributed equitably and do not result in discrimination against protected populations.

County Connection's Major Service Change Policy, Disparate Impact Policy, and Disproportionate Impact Policy were adopted by the Board of Directors on June 20, 2013. County Connection's System-wide Service Standards and Policies were adopted by the Board of Directors on December 18, 2014. See Appendix E for Board resolutions.

### Major Service Change Policy

All major increases or decreases in transit service are subject to a Title VI Equity Analysis prior to Board approval of the service change. A Title VI Equity Analysis completed for a major service change must be presented to the County Connection Board of Directors for its consideration.

County Connection defines a major service change as:

- An increase or decrease of 25 percent or more to the number of transit route miles of a bus route; or
- An increase or decrease of 25 percent or more to the number of daily transit revenue miles of a bus route for the day of the week for which the change is made; or.
- A change of service that affects 25 percent or more of daily passenger trips of a bus route for the day of the week for which the change is made.

Changes shall be counted cumulatively, with service changes being “major” if the 25 percent change occurs at one time or in stages, with changes totaling 25 percent over a 12-month period.

The following service changes are exempted from this policy:

- Changes to service on a route with fewer than 10 total trips in a typical service day are not considered “major” unless service on that route is eliminated completely on any such day.
- The introduction or discontinuation of short- or limited-term service (e.g., promotional, demonstration, seasonal or emergency service, or service provided as mitigation or diversions for construction or other similar activities), as long as the service will be/has been operated for no more than twelve months.
- County Connection-operated transit service that is replaced by a different mode or operator providing a service with similar or better headways, fare, transfer options, span of service, and stops.

## Disparate Impact Policy

This policy establishes a threshold for determining whether a given action has a disparate impact on minority populations. Per FTA Circular 4702.1B:

*Disparate impact refers to a facially neutral policy or practice that disproportionately affects members of a group identified by race, color, or national origin, where the recipient's policy or practice lacks a substantial legitimate justification and where there exists one or more alternatives that would serve the same legitimate objectives but with less disproportionate effect on the basis of race, color, or national origin...*

*The policy shall establish a threshold for determining when adverse effects of [fare/] service changes are borne disproportionately by minority populations. The disparate impact threshold defines statistically significant disparity and may be presented as a statistical percentage of impacts borne by minority populations compared to impacts borne by non-minority populations. The disparate impact threshold must be applied uniformly... and cannot be altered until the next Title VI Program submission.*

In the course of performing a Title VI Equity Analysis, County Connection must analyze how the proposed action would impact minority as compared to non-minority populations. In the event the proposed action has a negative impact that affects minorities more than non-minorities with a disparity that exceeds the adopted Disparate Impact Threshold, or that benefits non-minorities more than minorities with a disparity that exceeds the adopted Disparate Impact Threshold, County Connection must evaluate whether there is an alternative that has a more equitable impact. Otherwise, County Connection must take measures to mitigate the impact of the proposed action on the affected minority population and demonstrate that a legitimate business purpose cannot otherwise be accomplished and that the proposed change is the least discriminatory alternative.

The Disparate Impact Threshold to determine if the adverse impacts of a major service change or a fare adjustment is established at 20 percent based on the cumulative impact of the proposed service and/or fare changes. This threshold applies to the difference of the impacts borne by minority populations compared to the same impacts borne by non-minority populations.

## Disproportionate Burden Policy

This policy establishes a threshold for determining whether a given action has a disproportionate burden on low-income populations versus non-low-income populations. The Disproportionate

Burden Policy applies only to low-income populations that are not also minority populations. Per FTA Circular 4702.1B:

*The policy shall establish a threshold for determining when adverse effects of [fare/]service changes are borne disproportionately by low-income populations. The disproportionate burden threshold defines statistically significant disparity and may be presented as a statistical percentage of impacts borne by low-income populations as compared to impacts borne by non-low-income populations.... The disproportionate burden threshold must be applied uniformly... and cannot be altered until the next [Title VI] program submission.... At the conclusion of the analysis, if the transit provider finds that low-income populations will bear a disproportionate burden of the proposed fare[/service] change, the transit provider should take steps to avoid, minimize, or mitigate impacts where practicable. The transit provider should describe alternatives available to low-income populations affected by the fare[/service] changes.*

The County Connection Disproportionate Burden Threshold to determine if the adverse impacts of a major service change or a fare adjustment is established at 20 percent based on the cumulative impact of the proposed service and/or fare changes. This threshold applies to the difference of the impacts borne by low-income populations compared to the same impacts borne by non-low-income populations.

## **System-wide Service Standards**

Pursuant to requirements set forth in The Federal Transit Administration's (FTA) Circular 4702.1B County Connection must establish and monitor its performance under quantitative Service Standards and qualitative Service Policies. These service standards contained herein are used to develop and maintain efficient and effective fixed-route transit service. In some cases, these standards differ from standards used by County Connection for other purposes.

The FTA requires all fixed-route transit providers to develop quantitative standards for the following indicators:

1. Vehicle Load
2. Vehicle Headways
3. On-time Performance
4. Service Availability

## Vehicle Load

Vehicle Load Factor is described as follows by FTA Circular 4702.1B:

*Vehicle load can be expressed as the ratio of passengers to the total number of seats on a vehicle. For example, on a 40-seat bus, a vehicle load of 1.3 means all seats are filled and there are approximately 12 standees. A vehicle load standard is generally expressed in terms of peak and off-peak times.*

County Connection calculates Vehicle Load Factor by dividing the average peak passenger load on each route by the fleet's average seating capacity. Vehicle Load Factor is monitored regularly and used to determine whether additional capacity needs to be added to specific trips or routes based on changing demand patterns.

### Standard:

County Connection has implemented a maximum Vehicle Load Factor of 1.25 during peak and 1.00 during off-peak times.

## Vehicle Headway

Vehicle headway is described as follows by FTA Circular 4702.1B:

*Vehicle headway is the amount of time between two vehicles traveling in the same direction on a given line or combination of lines. A shorter headway corresponds to more frequent service. Vehicle headways are measured in minutes (e.g., every 15 minutes). Headways and frequency of service are general indications of the level of service provided along a route. Vehicle headway is one component of the amount of travel time expended by a passenger to reach his/her destination.*

County Connection calculates headway by determining the average length of time between buses on each route. In the event a route regularly exceeds Vehicle Load Factor standards, County Connection will evaluate whether headways should be reduced within the confines of funding levels.

### Standard:

County Connection has implemented a maximum vehicle headway standard of 2-hours.

## On-Time Performance

On-time performance is described as follows by FTA Circular 4702.1B:

*On-time performance is a measure of runs completed as scheduled. This criterion first must define what is considered to be “on time.” For example, a transit provider may consider it acceptable if a vehicle completes a scheduled run between zero and five minutes late in comparison to the established schedule. On-time performance can be measured against route origins and destinations only, or against origins and destinations as well as specified time points along the route. Some transit providers set an on-time performance standard that prohibits vehicles from running early (i.e., ahead of schedule) while others allow vehicles to run early within a specified window of time (e.g., up to five minutes ahead of schedule). An acceptable level of performance must be defined (expressed as a percentage). The percentage of runs completed system-wide or on a particular route or line within the standard must be calculated and measured against the level of performance for the system.*

County Connection defines a bus as late if it departs the “time point” five or more minutes later than the published time. Buses are considered early if they depart from a published time point at any time prior to the scheduled departure.

### Standard:

County Connection has adopted on-time performance goals that are based on service type: 87 percent for local routes, 75 percent for express routes, and 80 percent for select and weekend routes. On-time performance is tracked and included within monthly performance reports to the County Connection’s Board of Directors.

## Service Availability

Service availability/transit access is described as follows by FTA Circular 4702.1B:

*Service availability is a general measure of the distribution of routes within a transit provider’s service area. For example, a transit provider might set a service standard to distribute routes such that a specified percentage of all residents in the service area are within a one-quarter mile walk of bus service or a one-half mile walk of rail service. A standard might also indicate the maximum distance between stops or stations. These*



*measures related to coverage and stop/station distances might also vary by population density.*

County Connection will determine transit availability by mapping all active bus stops within the system and then calculating the population that resides within three-quarter mile radii of those stops. This information is then compared to the total service area population.

Standard:

County Connection has implemented a goal of ensuring 70 percent of residents within County Connection's service area live within three quarters (0.75) of a mile from a bus stop.

## Systemwide Service Policies

The FTA requires fixed-route transit providers to develop a policy for each of the following service indicators:

1. Vehicle Assignment
2. Transit Amenities

These policies were developed to ensure that vehicles and transit amenities are distributed equitably across the system and do not result in discrimination against protected populations. They differ from service standards in that they are not based on meeting a quantitative threshold, but rather qualitative evaluation results.

### Vehicle Assignment

Vehicle assignment is described as follows by FTA Circular 4702.1B:

*Vehicle assignment refers to the process by which transit vehicles are placed into service in depots and on routes throughout the transit provider's system. Policies for vehicle assignment may be based on the age of the vehicle, where age would be a proxy for condition. For example, a transit provider could set a policy to assign vehicles to depots so that the age of the vehicles at each depot does not exceed the system-wide average. The policy could also be based on the type of vehicle. For example, a transit provider may set a policy to assign vehicles with more capacity to routes with higher ridership and/or during peak periods.*

County Connection currently has three general types of buses in the fleet, all of which are maintained at a single depot and to the same strict standards:

- 29-foot heavy-duty transit buses
- 35-foot heavy-duty transit buses
- 40-foot heavy-duty transit buses

Policy:

All buses have the same level of amenities (i.e., air conditioning, wheelchair lifts, automated stop announcements), available to riders. Buses are not assigned to specific communities within County Connection's service area based on vehicle age, but rather to serve specific routes that call for vehicles of differing lengths based on street limitations and average loads. Many of the routes serve multiple communities with diverse populations. Given County Connection's strict standards with respect to maintenance, age does not serve as a viable proxy for diminished quality.

## Transit Amenities

Transit amenities are described as follows by FTA Circular 4702.1B:

*Transit amenities refer to items of comfort, convenience, and safety that are available to the general riding public. Fixed-route transit providers must set a policy to ensure equitable distribution of transit amenities across the system. Policies in this area address how these amenities are distributed within a transit system, and the manner of their distribution determines whether transit users have equal access to these amenities. This...is not intended to impact funding decisions for transit amenities. Rather, this...applies after a transit provider has decided to fund an amenity.*

Policy:

Transit amenities are distributed on a system-wide basis. Transit amenities include shelters and benches. The location of transit amenities is determined by factors such as ridership, individual requests, staff recommendations, and vendor preference (in the case of shelters which feature advertisements).

Staff seeks to distribute benches and shelters to match the distribution of minority Census tracts.

## G. DEMOGRAPHIC & SERVICE PROFILE

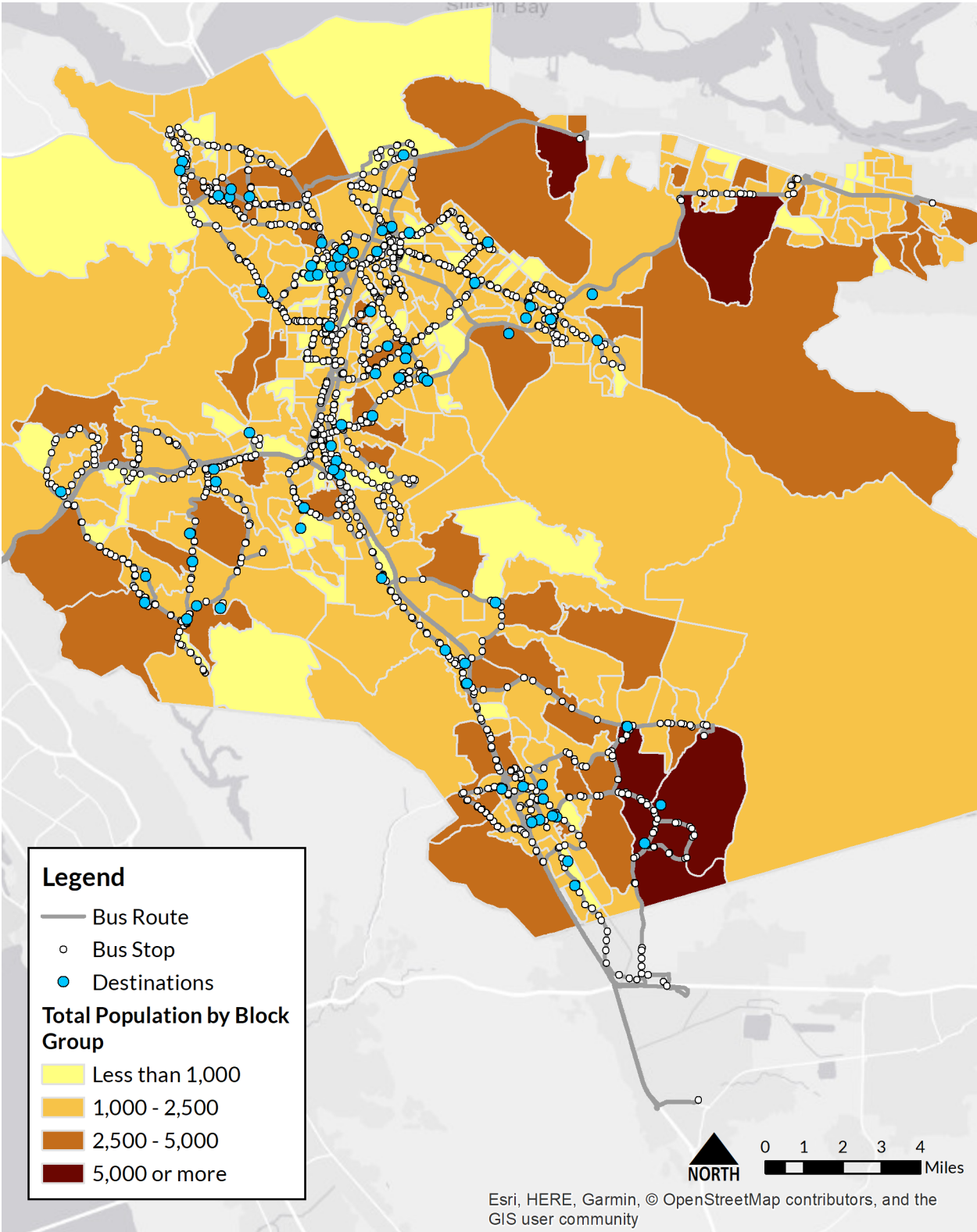
County Connection's service area is the central portion of Contra Costa County and includes the cities of Concord, Pleasant Hill, Martinez, Walnut Creek, Clayton, Lafayette, Orinda, Moraga, Danville, and San Ramon. Segments of some routes operate within Alameda County. However, for the purposes of this analysis, the service area consists of only Census block groups within Contra Costa County.

The following maps show County Connection's service area, along with demographics based on Census data from the 2015-2019 ACS 5-year Estimates. This analysis uses the following definitions:

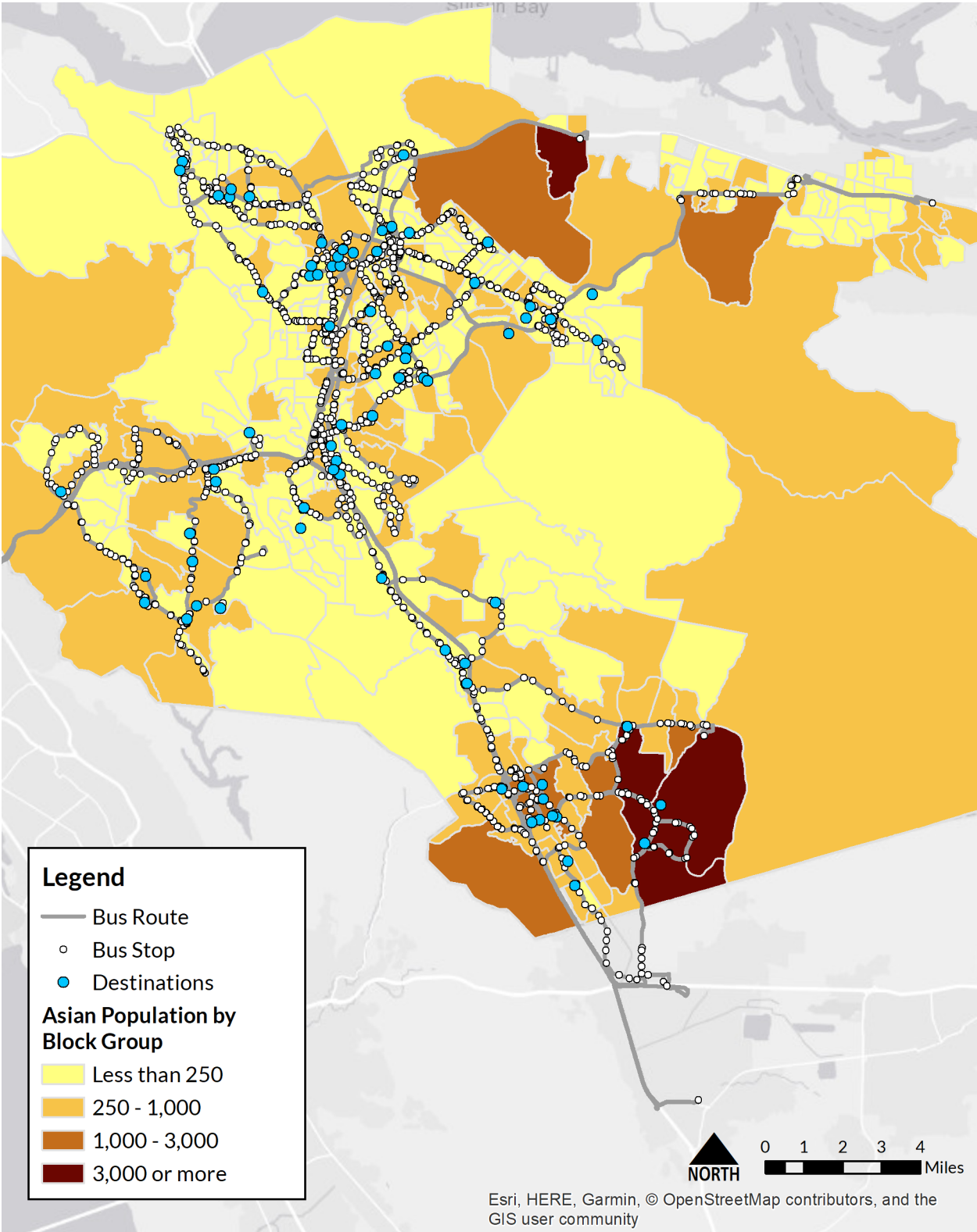
- **Minority** – FTA defines a minority person as anyone who is American Indian or Alaska Native, Asian, Black or African American, Hispanic or Latino, or Native Hawaiian or other Pacific Islander.
- **Low-Income** – FTA defines a low-income person as a person whose household income is at or below the U.S. Department of Health and Human Services (HHS) poverty guidelines. However, FTA encourages the use of any locally developed threshold provided that the threshold is at least as inclusive as the HHS poverty guidelines. Due to the area's higher cost of living, County Connection defines low-income as at or below 150% of the federal poverty level.

Based on Census data, 46.8% of the overall population within County Connection's service area identifies as minority, and 11.6% of households are considered low-income. Block groups where the proportion of minority or low-income population is equal to or greater than the percentage for the service area as a whole are categorized as minority or low-income block groups, respectively.

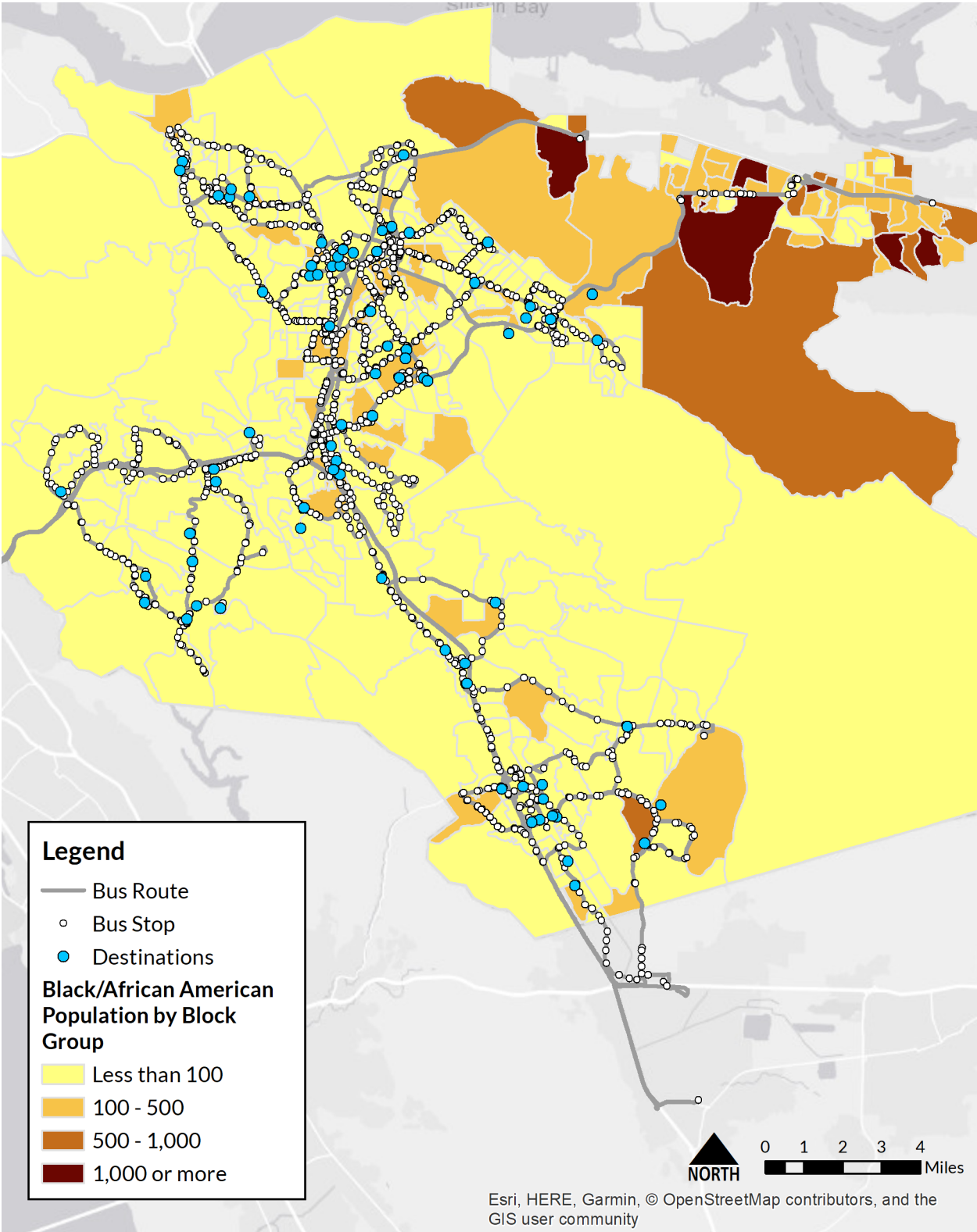
Total Population by Census Block Group



Asian Population by Census Block Group

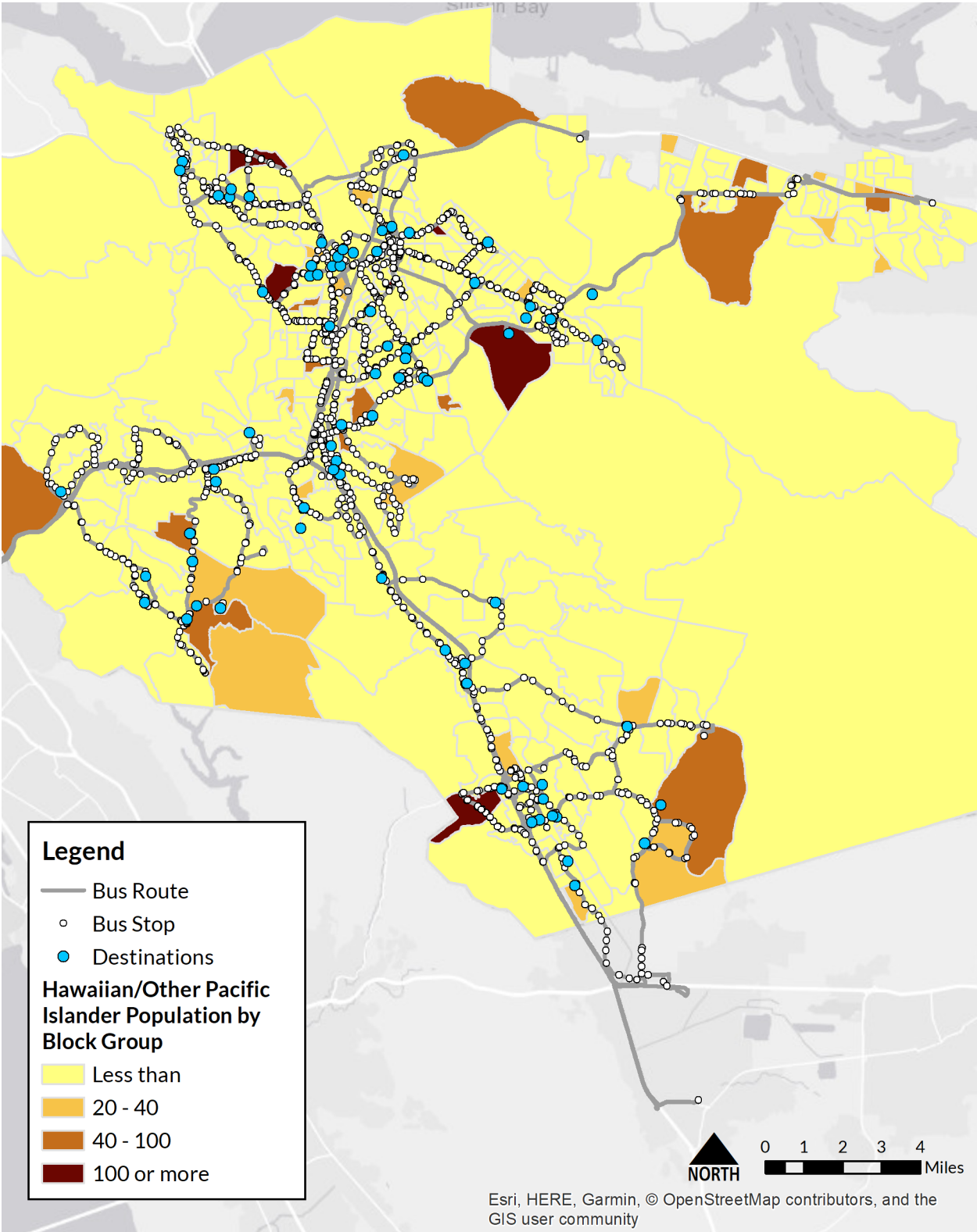


Black Population by Census Block Group

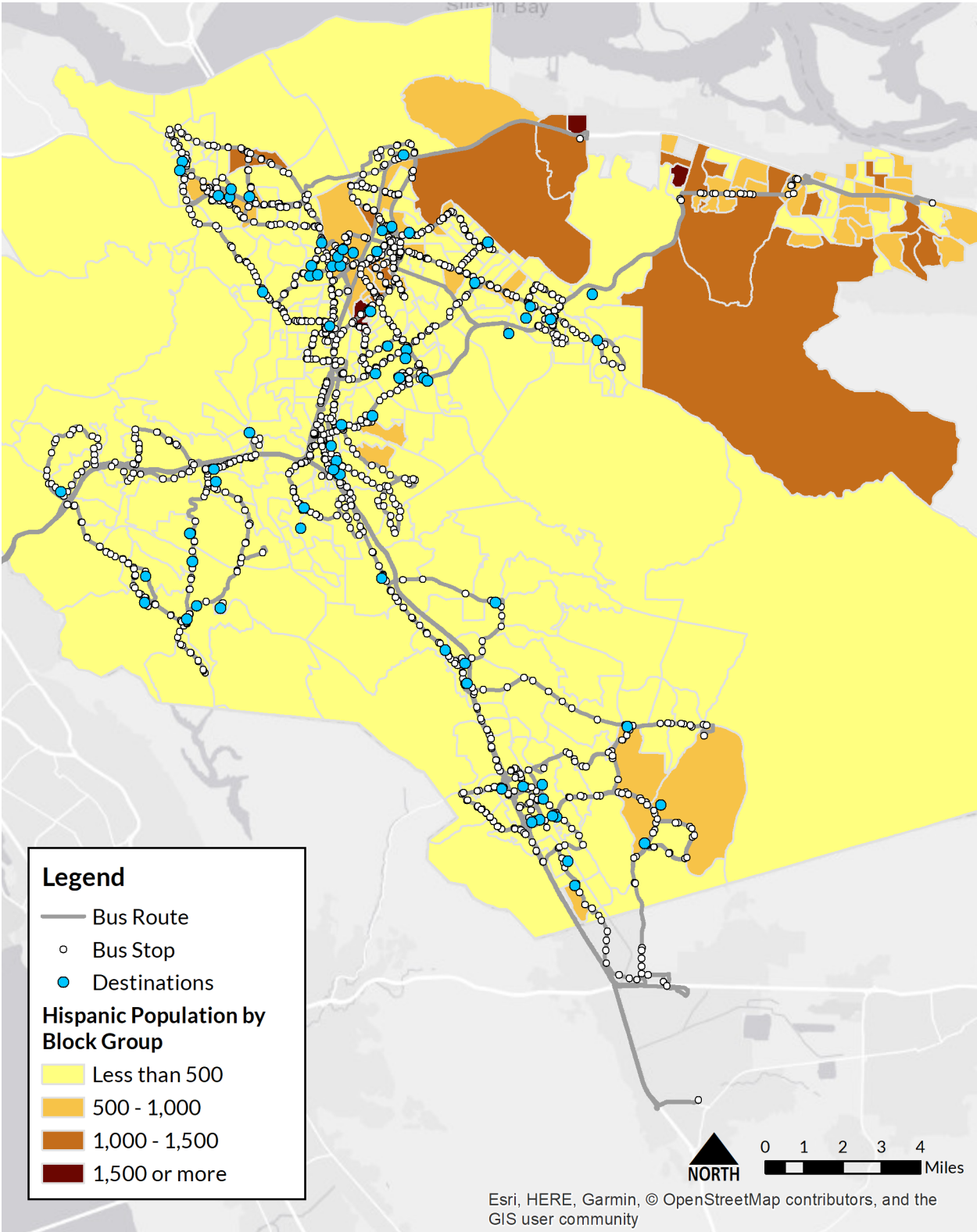




Hawaiian/Pacific Islander Population by Census Block Group

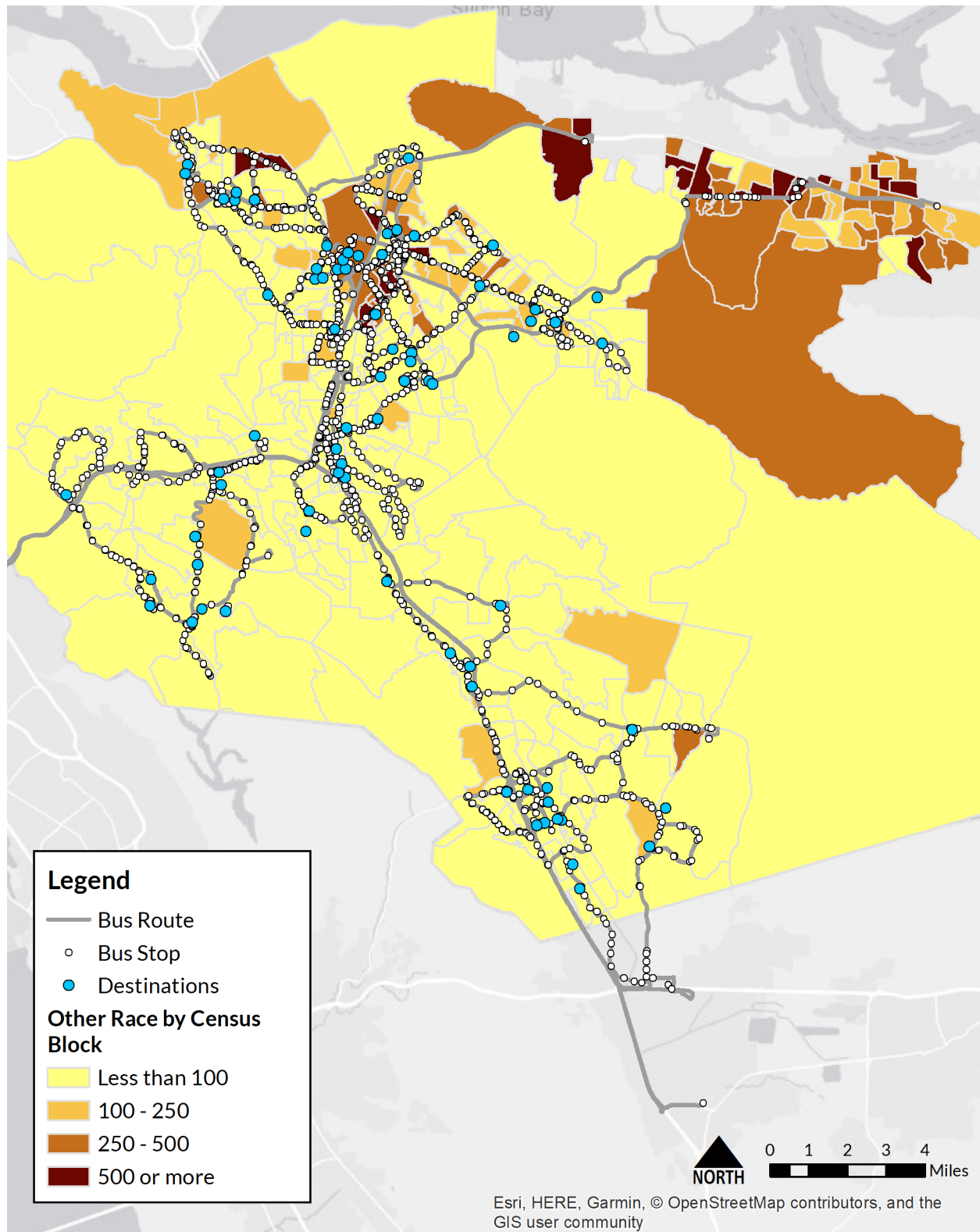


Hispanic Population by Census Block Group

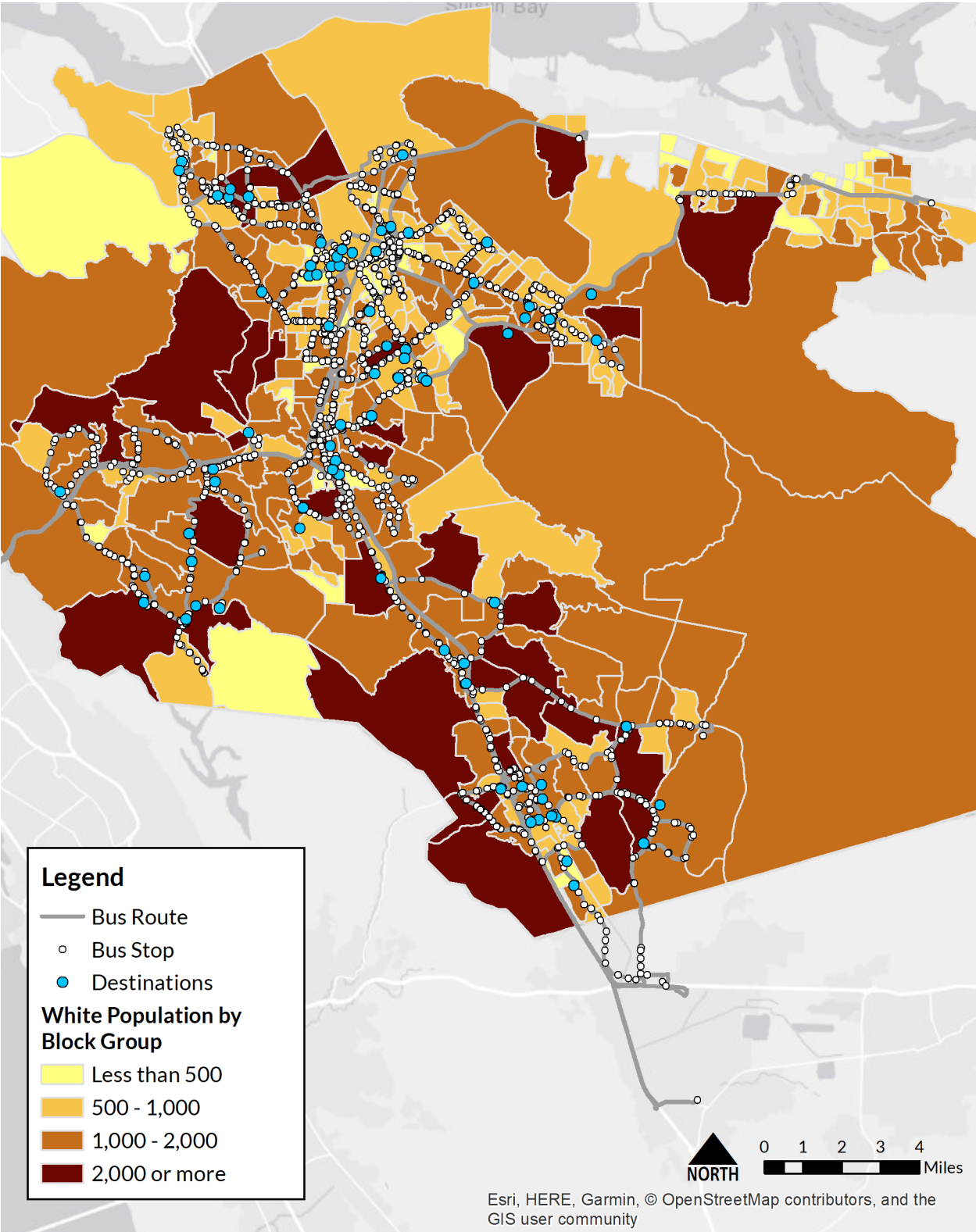




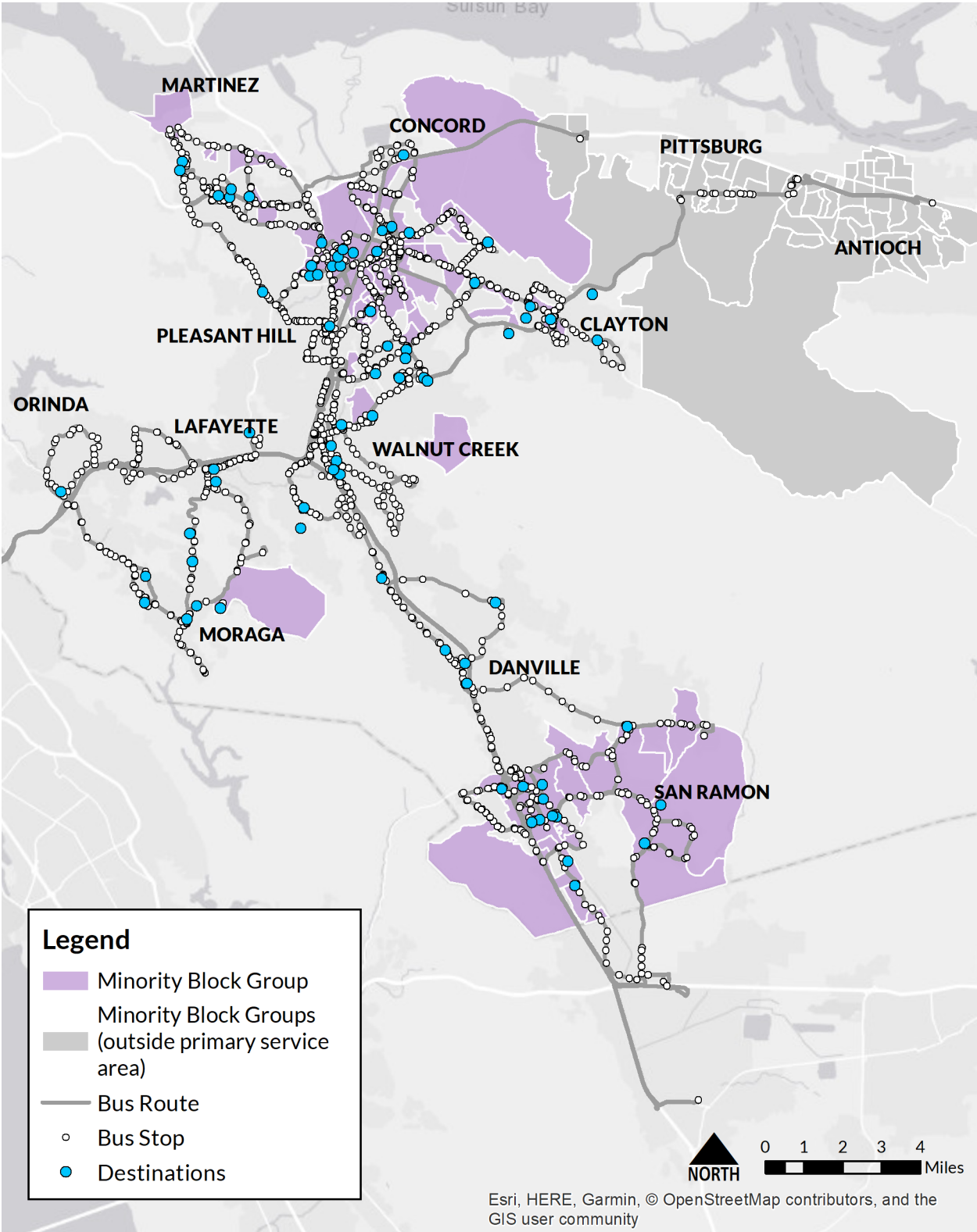
“Other Races” Population by Census Block Group



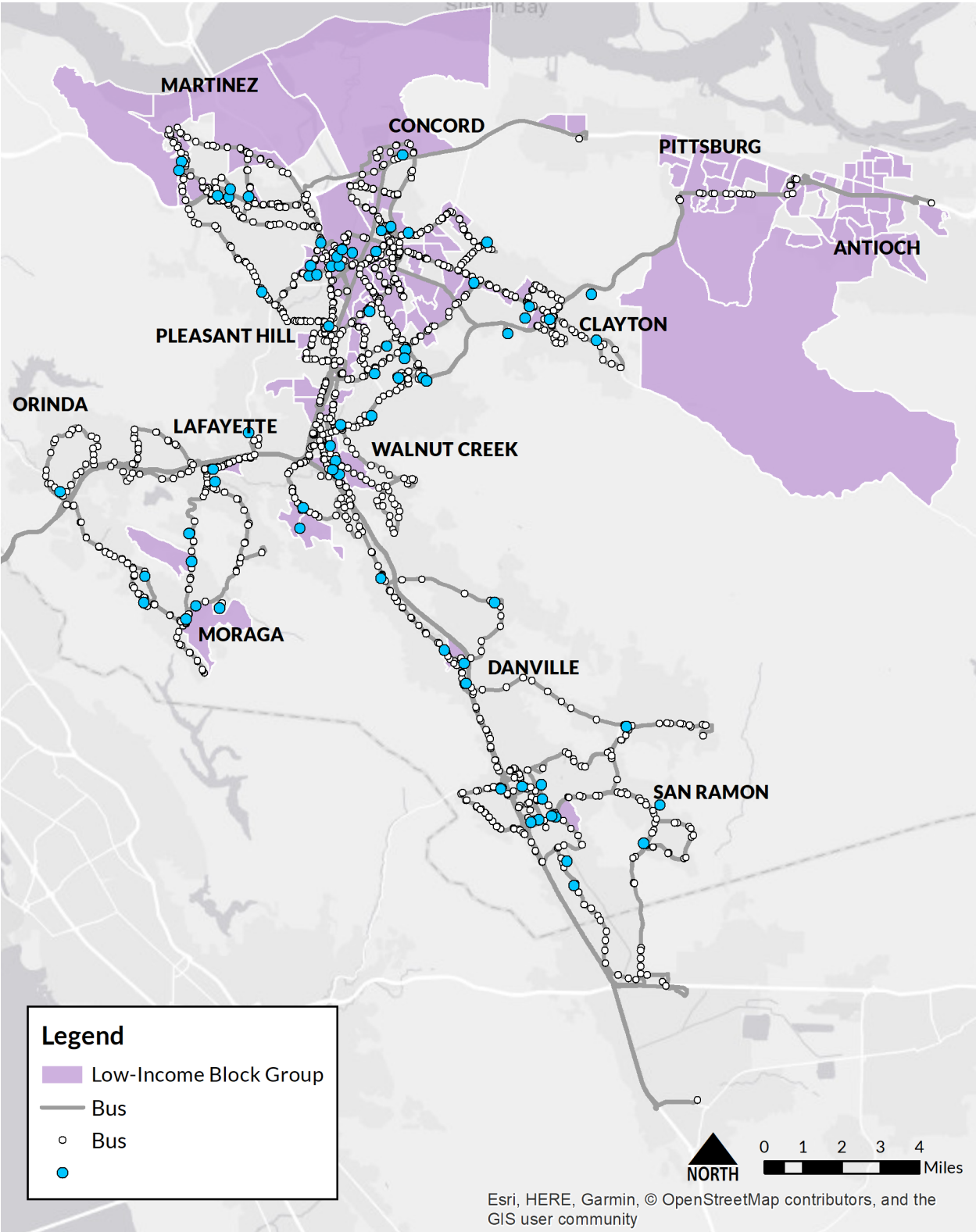
White Population by Census Block Group



Minority Block Groups



Low-Income Block Groups



## H. RIDERSHIP & TRAVEL PATTERNS

Passenger surveys are conducted system-wide every three years using a market research firm. The purpose of the survey is to collect customer demographic information, such as race/ethnicity, English proficiency, and income, as well as trip information, such as origin and destination and trip purpose.

Traditionally, paper surveys are distributed on-board vehicles and collected by surveyor staff. The results are entered, cleaned, and compiled in a succinct report by the contractor. County Connection's most recent survey, however, was conducted in person using handheld tablet devices. This method provided more accurate responses and eliminated the need for manual data entry, which can introduce errors. The complete dataset (along with a report) was provided to County Connection to use at its discretion.

The executive summary from the most recent survey conducted in October 2019 is attached.

## EXECUTIVE SUMMARY

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The Central Contra Costa Transit Authority (County Connection) conducted a 2019 Transit On-Board Survey in partnership with Metropolitan Transportation Commission (MTC). MTC contracted with ETC Institute to conduct the On-Board Survey of County Connection passengers. This report will provide an overview and detailed description of the 2019 Transit On-Board Survey process. The report covers the on-board survey results, survey methodology and administration, and the quality assurance/quality control data review process.

In addition to the full on-board survey conducted on weekdays, a sampling of weekend surveys were collected. The weekend data was summarized and is included in Appendix A.

## OBJECTIVES

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The primary objectives for the survey were as follows:

- Compile statistically accurate information about County Connection Passengers and how they use transit in the region.
- Generate reliable linked OD data to support computerized travel demand modeling and transportation network simulation activities for purposes of regional long-range transportation planning.
- Acquire demographic data to meet Title VI Civil Rights Act federal compliance requirements.

## SURVEY METHODOLOGY SUMMARY

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ETC Institute interviewers conducted the On-Board Survey on a representative sample of County Connection routes. The survey was conducted on both weekdays and weekends, using separate sampling plans and collection goals for each. The passenger-intercept interviews were completed using hand-held tablet personal computers (PC) upon which the online survey, created and developed by ETC Institute in cooperation with County Connection and MTC, was administered. Passengers were selected for participation using a random sampling application built into the survey program itself, and passenger responses were captured in real time. ETC Institute interviewers were required to adhere strictly to the random sampling protocol and were at no time permitted to exercise personal discretion with regard to the selection of survey participants.

For those passengers who elected to participate, the survey was administered in two uninterrupted sections: the first was designed to create a detailed record of the passenger's current one-way trip; the second to gather required demographic data. In the initial section, the tablet PC's survey mapping features allowed for geo-coding of addresses using information provided by the passenger. Passengers were able to see each on-screen map and confirm the accuracy of the trip data collected. At the end of the survey's first section, passengers were asked to confirm a comprehensive summary of their complete one-way trip. In the demographics section, passengers were offered the choice of physically selecting the answers themselves - actually pressing the options on the tablet PC screen - to ensure their privacy or providing the information for the interviewer to record their responses. Upon completion of the survey, minimal passenger contact information was collected, and passengers were thanked for their time and willingness to participate.



ETC Institute interviewers were available to answer passenger questions, the most common of which involved the need to ask for personal information, and how the information gathered would ultimately be used. Passengers were assured all information collected would be kept strictly confidential, that County Connection intended to use the information for research purposes designed to improve their system, and that the information would never be used for any commercial purpose.

## TRANSIT TRIP CHARACTERISTICS

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The following bullets describe weekday County Connection Passengers' transit trip characteristics:

- Half (49.77%) of all passenger trips surveyed were either home-to-work or work-to-home trips, while seventeen percent (16.59%) of all passenger trips involved either going to or coming from school (K-12 or College/University).
- Eighty-eight percent (87.51%) of passengers responding to the survey reported walking to access transit. Twelve percent (11.58%) reported using a vehicle of some sort, either driving or getting dropped off, to access transit.
- Fifty-one percent (50.71%) of all County Connection passengers had trips that did not require any transfers on any public transit to complete their one-way trip (using any agency's public transit). Forty-one percent required one transfer (41.34%), and eight percent required two or more transfers (7.95%).
- Seventy-eight percent (78.23%) of all County Connection passengers used Clipper to pay for their one-way trip, while another twenty-two percent (20.54%) indicated they used Cash or Paper.

## TRANSIT RIDER PASS/PAYMENT CHARACTERISTICS

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The following bullets describe weekday County Connection passengers' payment and fare characteristics:

- The majority of County Connection passengers indicated they used the "Adult" fare category for riding (70.34%), compared to the next highest, "Free" (23.63%).
- "By Clipper" was the most widely used fare payment type as indicated by passengers (78.23%), compared to the next highest, "By Cash or Paper" (20.54%).
- Nearly one quarter of respondents (23.63%) saw either a slight or significant improvement to County Connection services while thirty-two percent (32.03%) saw no change in County Connection services.
- The majority of County Connection passengers get schedule information using the County Connection Website at forty-eight percent (47.93%).

## TRANSIT RIDER PROFILE

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The following bullets describe weekday County Connection passengers' demographics:

- Sixty-nine percent (67.75%) of County Connection passengers are employed.
- Eighteen percent (17.89%) of passengers indicated they were a student either part- or full-time at a college university, while an additional three percent (2.97%) indicated they were a K-12 student.
- Twenty-one percent (21.39%) of respondent's indicated they are under the age of 25.
- The race/ethnicity of County Connection passengers in the region are: White (44.72%), Latino / Hispanic (18.76%), Black / African American (18.25%), Asian (14.42%), Hawaiian / Pacific Islander (2.09%), and Other (2.52%).
- Forty percent (39.94%) of County Connection passengers reported an annual household income of less than \$50,000 and ten percent (9.92%) reported an annual household income of \$75,000 or more.



# I. MONITORING PROGRAM RESULTS

## System-Wide Service Standards

Pursuant to requirements set forth in FTA Circular 4702.1B, County Connection must establish and monitor its performance using quantitative Service Standards and qualitative Service Policies. These service standards contained herein are used to develop and maintain efficient and effective fixed-route transit service.

Some standards are defined with regards to peak and off-peak hours. Peak hours are 6:00 a.m. to 8:59 a.m. and 4:00 p.m. to 7:59 p.m., intervals during which ridership tends to be highest. Off-peak hours are any times that are not within the peak hour ranges.

## Route Designations

As part of the Title VI service monitoring and evaluation process, each bus route is designated as either a “minority route” or a “non-minority route.” Per FTA Circular 4702.1B:

*Minority transit route means a route that has at least 1/3 of its total revenue mileage in a Census block or block group, or traffic analysis zone(s) with a percentage of minority population that exceeds the percentage of minority population in the transit service area. A recipient may supplement this service area data with route-specific ridership data in cases where ridership does not reflect the characteristics of the census block, block group, or traffic analysis zone.*

County Connection utilized Census data from the 2015-2019 ACS 5-year Estimates supplemented with its triennial customer survey data to classify routes as minority or non-minority. In addition, a similar analysis was performed to also classify routes as either a “low-income route” or a “non-low income route.”

Based on Census data, 46.8% of the overall population within County Connection’s service area identifies as minority, and 11.6% of households are considered low-income. Block groups where the proportion of minority or low-income population is equal to or greater than the percentage for the service area as a whole are categorized as minority or low-income block groups, respectively. Any route with at least a third of its revenue miles within a minority block group is designated as a minority route, and any route with at least a third of its revenue miles within a low-income block

group is designated as a low-income route. Based on this analysis, a total of 16 routes are minority routes and 22 routes are low-income routes.

Additional minority and low-income routes were identified using on-board passenger survey data in recognition that the surrounding geographic area of a route is not always reflective of the ridership demographics of that route. Any routes wherein a higher percentage of riders identified themselves as minority than the system average of 56.1% are categorized as minority routes, and any routes with more than the system average of 44.4% of riders who are considered low-income are categorized as low-income routes. Based on this analysis, an additional 5 routes are designated as minority routes, and an additional 4 routes are low-income routes.

Based on a combination of these two methodologies, a total of 21 routes are designated as minority routes, and 26 routes are low-income routes. These designations are shown in the following table and maps.

#### Minority and Low-Income Route Designations

Route	% Mileage in Minority Block Group	% of Minority Riders	Minority Route	% Mileage in Low Income Block Group	% of Low Income Riders	Low Income Route
<b>Local Routes</b>						
1	5.1%	48.3%		4.8%	<b>58.3%</b>	yes
4	0.0%	<b>56.6%</b>	yes	<b>36.8%</b>	<b>60.9%</b>	yes
5	18.9%	55.0%		<b>54.5%</b>	33.3%	yes
6	2.1%	53.3%		9.0%	<b>50.0%</b>	yes
7	2.8%	<b>62.9%</b>	yes	10.0%	33.3%	
9	22.7%	<b>57.6%</b>	yes	<b>44.2%</b>	36.7%	yes
10	<b>38.7%</b>	<b>63.8%</b>	yes	28.3%	<b>49.3%</b>	yes
11	<b>46.6%</b>	<b>58.3%</b>	yes	<b>51.9%</b>	41.7%	yes
14	<b>38.4%</b>	<b>65.8%</b>	yes	<b>40.6%</b>	<b>59.0%</b>	yes

# FINAL TITLE VI PROGRAM REPORT

## I. Monitoring Program Results

Route	% Mileage in Minority Block Group	% of Minority Riders	Minority Route	% Mileage in Low Income Block Group	% of Low Income Riders	Low Income Route
15	24.0%	50.0%		<b>40.5%</b>	<b>67.9%</b>	yes
16	28.5%	51.5%		<b>43.2%</b>	25.0%	yes
17	<b>48.8%</b>	<b>65.4%</b>	yes	<b>50.1%</b>	<b>60.0%</b>	yes
18	31.4%	50.0%		<b>34.1%</b>	<b>70.8%</b>	yes
19	<b>64.0%</b>	<b>75.0%</b>	yes	<b>55.5%</b>	<b>66.7%</b>	yes
20	<b>89.1%</b>	<b>56.6%</b>	yes	<b>87.8%</b>	25.6%	yes
21	15.0%	46.7%		14.4%	<b>52.2%</b>	yes
27	22.4%	--(1)		<b>77.6%</b>	--(1)	yes
28	26.6%	53.8%		<b>34.8%</b>	<b>60.9%</b>	yes
35	<b>82.0%</b>	<b>66.0%</b>	yes	1.6%	17.9%	
<b>Express Routes</b>						
91X	<b>84.0%</b>	42.9%	yes	<b>80.9%</b>	<b>50.0%</b>	yes
92X	27.6%	22.2%		4.6%	0.0%	
93X	<b>51.1%</b>	31.3%	yes	<b>37.8%</b>	43.8%	yes
95X	12.8%	<b>57.9%</b>	yes	6.3%	17.6%	
96X	21.3%	53.2%		6.3%	26.8%	
97X	<b>91.7%</b>	<b>60.0%</b>	yes	0.0%	30.0%	
98X	29.8%	54.2%		<b>44.8%</b>	15.4%	yes
99X	32.3%	40.0%		<b>43.1%</b>	40.0%	yes
<b>Weekend Routes</b>						
310	<b>38.7%</b>	43.5%	yes	28.3%	43.8%	

# FINAL TITLE VI PROGRAM REPORT

## I. Monitoring Program Results

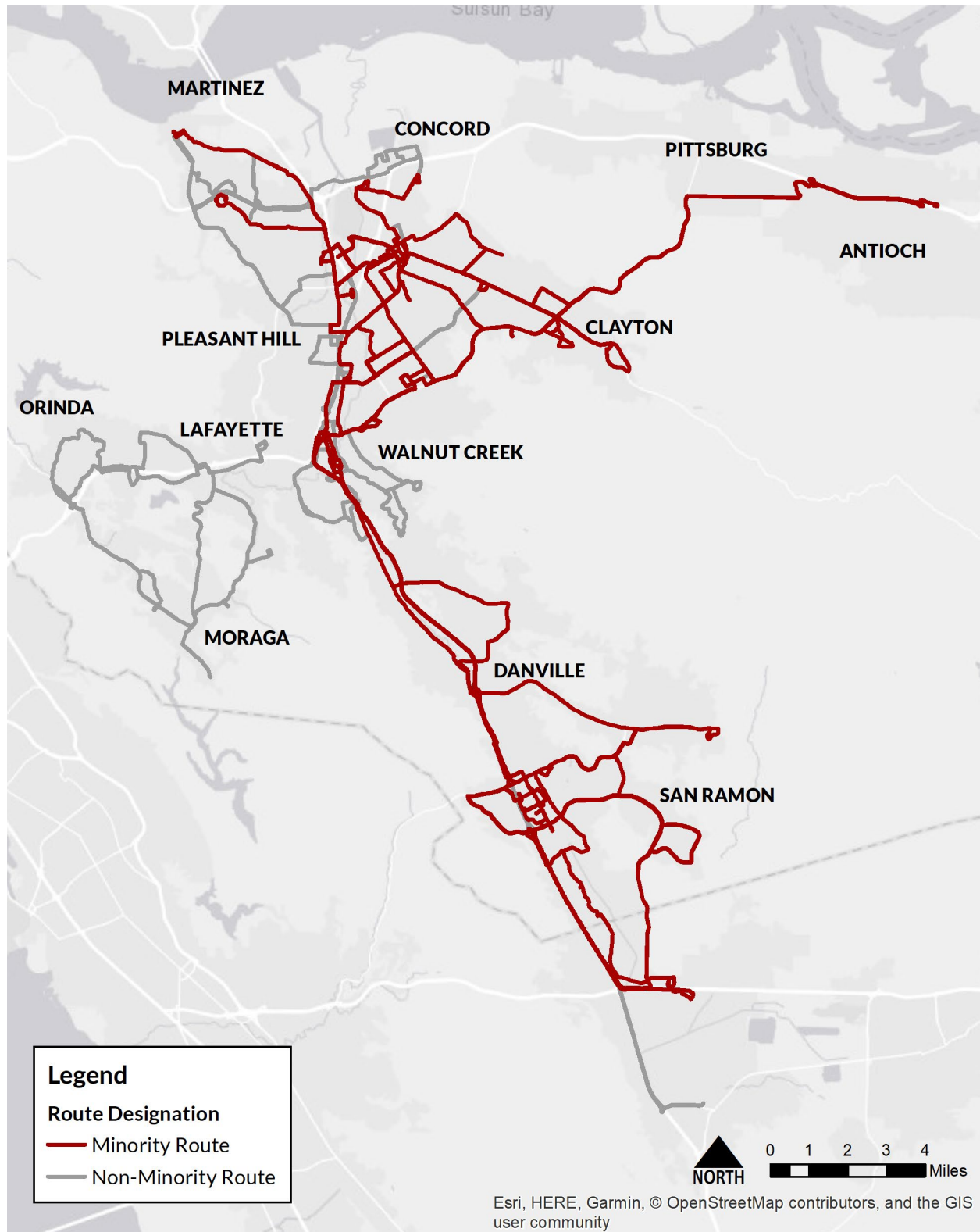
Route	% Mileage in Minority Block Group	% of Minority Riders	Minority Route	% Mileage in Low Income Block Group	% of Low Income Riders	Low Income Route
311	<b>33.3%</b>	<b>60.0%</b>	yes	<b>37.4%</b>	33.3%	yes
314	<b>59.7%</b>	<b>70.0%</b>	yes	<b>57.0%</b>	<b>56.3%</b>	yes
315	<b>51.2%</b>	50.0%	yes	<b>53.7%</b>	0.0%	yes
316	32.4%	46.7%		<b>47.1%</b>	<b>92.9%</b>	yes
320	<b>93.9%</b>	<b>75.0%</b>	yes	<b>88.5%</b>	<b>100.0%</b>	yes
321	15.3%	<b>70.0%</b>	yes	14.6%	11.1%	
335	<b>84.6%</b>	--(1)	yes	2.9%	--(1)	

Source: U.S. Census Bureau, 2015-2019 American Community Survey; 2019 Onboard Survey

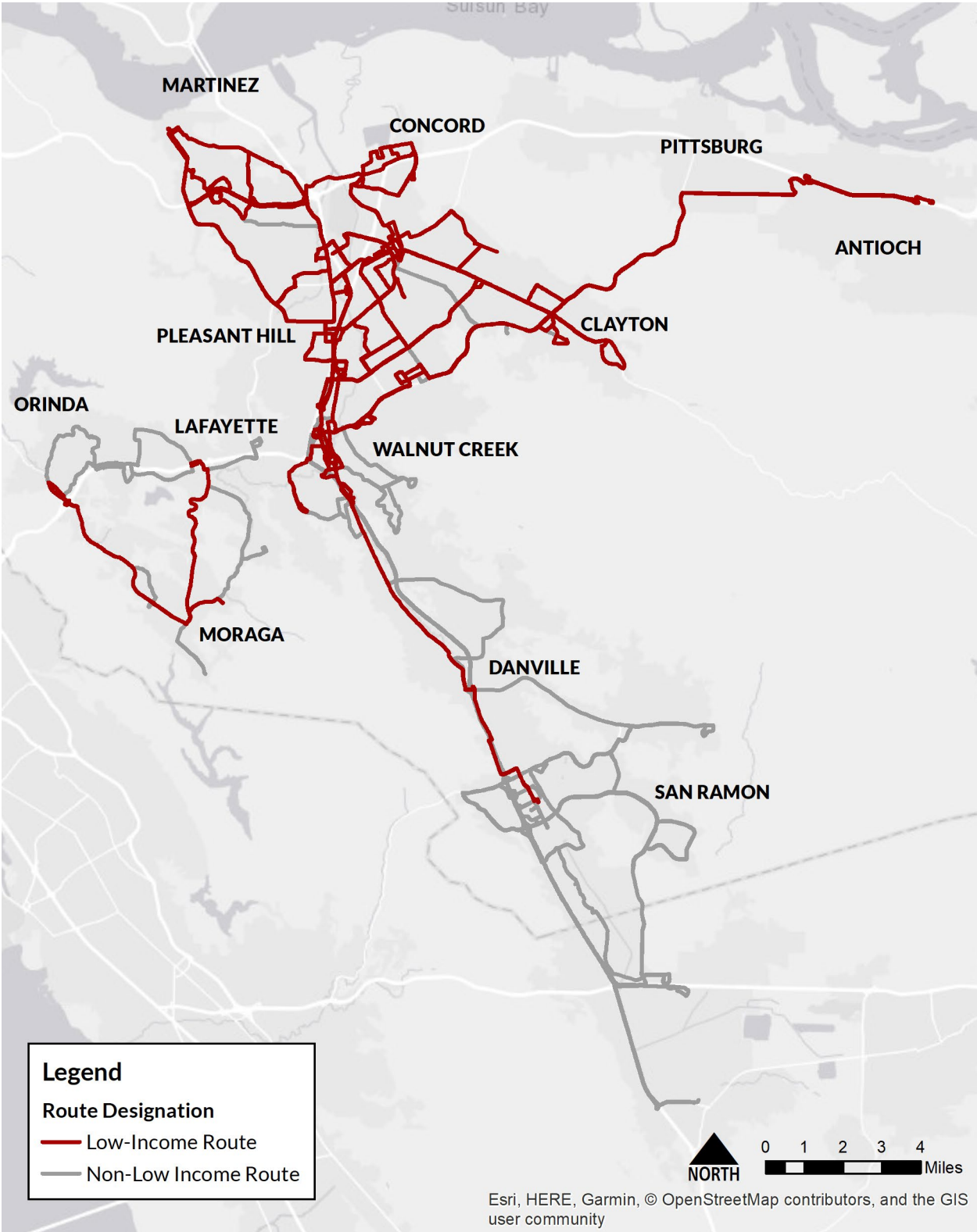
**Bold** indicates percentages meeting threshold for minority or low-income

(1) No survey data available for Routes 27 & 335

County Connection Routes Categorized by Minority/Non-Minority



County Connection Routes Categorized by Income Level



## Vehicle Load

### Standard:

Vehicle Load Factor is defined by FTA Circular 4702.1b as “the ratio of passengers to the total number of seats on a vehicle. For example, on a 40-seat bus, a vehicle load of 1.3 means all seats are filled and there are approximately 12 standees.” County Connection’s vehicle load standards are calculated by dividing the average peak passenger load on each route by the number of seats on the type of bus typically assigned to that route.

### Finding:

Across all County Connection routes, vehicle load factor standards were met.

### Vehicle Load Factor

Vehicle Load Factor	Peak	Off-Peak
Standard	1.25	1.00
Actual	0.27	0.25
<b>By Route Designation</b>		
Minority Route	0.27	0.27
Non-Minority Route	0.26	0.24
Low Income Route	0.26	0.26
Non-Low Income Route	0.27	0.21

Source: Fall 2019 APC data

## Vehicle Headway

### Standard:

Vehicle headway is defined by FTA Circular 4702.1B as “the amount of time between two vehicles traveling in the same direction on a given line or combination of lines.” County Connection has established a maximum vehicle headway standard of 2 hours.

### Finding:

Based on schedules from Winter 2019 (effective November 17, 2019), the maximum systemwide headway was on Route 6 with midday frequency on weekends of 120 minutes, which just meets the

vehicle headway standard. However, it should be noted that significant service changes were made within the past year, which improved efficiency and reduced the maximum systemwide headway to 90 minutes.

Route 6 is also designated as a non-minority and low-income route. Among minority routes, the maximum headway was on Route 19 with a frequency of 90 minutes. Among non-low income routes, the maximum headway was 60 minutes.

#### Maximum Vehicle Headway

Vehicle Headway	
Standard	2:00
Actual	2:00
By Route Designation	
Minority Route	1:30
Non-Minority Route	2:00
Low Income Route	2:00
Non-Low Income Route	1:00

#### On-Time Performance

##### Standard:

On-time performance is defined by FTA Circular 4702.1b as “a measure of runs completed as scheduled.” A bus is considered late if it departs its scheduled “time point” five or more minutes later than the scheduled time. A bus is considered early if it departs from a scheduled “time point” at any time prior to the scheduled departure time.

##### Finding:

Overall, County Connection met its on-time performance standards for almost all route types, as shown below.



**On-Time Performance**

On-Time Performance	Local	Express	Select <sup>(1)</sup>	Weekend
Standard	87%	75%	80%	80%
Actual	87%	85%	82%	83%
<b>By Route Designation</b>				
Minority Route	89%	85%	--	82%
Non-Minority Route	85%	86%	--	87%
Low Income Route	87%	89%	--	85%
Non-Low Income Route	84%	84%	--	80%

Source: FY 2019 APC data

(1) Select routes do not have minority or low-income designations due to the inability to collect reliable survey data, as the routes mostly serve youth riders.

**Service Availability**

Service availability/transit access is defined by FTA Circular 4702.1B as “a general measure of the distribution of routes within a transit provider’s service area.” County Connection’s goal is to ensure that 70 percent of county residents live within three quarters of a mile from a bus stop.

Finding:

County Connection’s standard for service availability was met for the service area population as a whole, as well as for minority and low-income populations.

**Service Availability Population**

<b>Service Availability</b>	
Standard	70%
Service Area Population	654,949
Population within 3/4 Mile	501,864
% Population Served	77%
<b>Minority Population</b>	
Service Area Minority Population	306,465
Minority Population within 3/4 Mile	219,438
% Minority Population Served	72%
<b>Low-Income Population</b>	
Service Area Low-Income Population	76,012
Low-Income Population within 3/4 Mile	54,496
% Low-Income Population Served	72%

Source: U.S. Census Bureau, 2015-2019 American Community Survey

**Systemwide Service Policies****Vehicle Assignment**

Vehicle assignment is defined by FTA Circular 4702.1B as “the process by which transit vehicles are placed into service in depots and on routes throughout the transit provider’s system.” County Connection’s policy states that all buses have the same level of amenities (i.e., air conditioning, wheelchair lifts, automated stop announcements) available to riders.

Buses are not assigned to specific communities within County Connection’s service area based on vehicle age, but rather to serve specific routes that call for vehicles of differing lengths based on street limitations. Many of the routes serve multiple communities with diverse populations. Given County Connection’s strict standards with respect to maintenance, age does not serve as a viable proxy for diminished quality.

## Transit Amenities

Transit amenities are defined by FTA Circular 4702.1B as “items of comfort, convenience, and safety that are available to the general riding public.” These include bus shelters, bus stop benches, and trash receptacles. Transit amenities are distributed on a system-wide basis. The location of transit amenities is determined by factors such as ridership, individual requests, staff recommendations, and vendor preference.

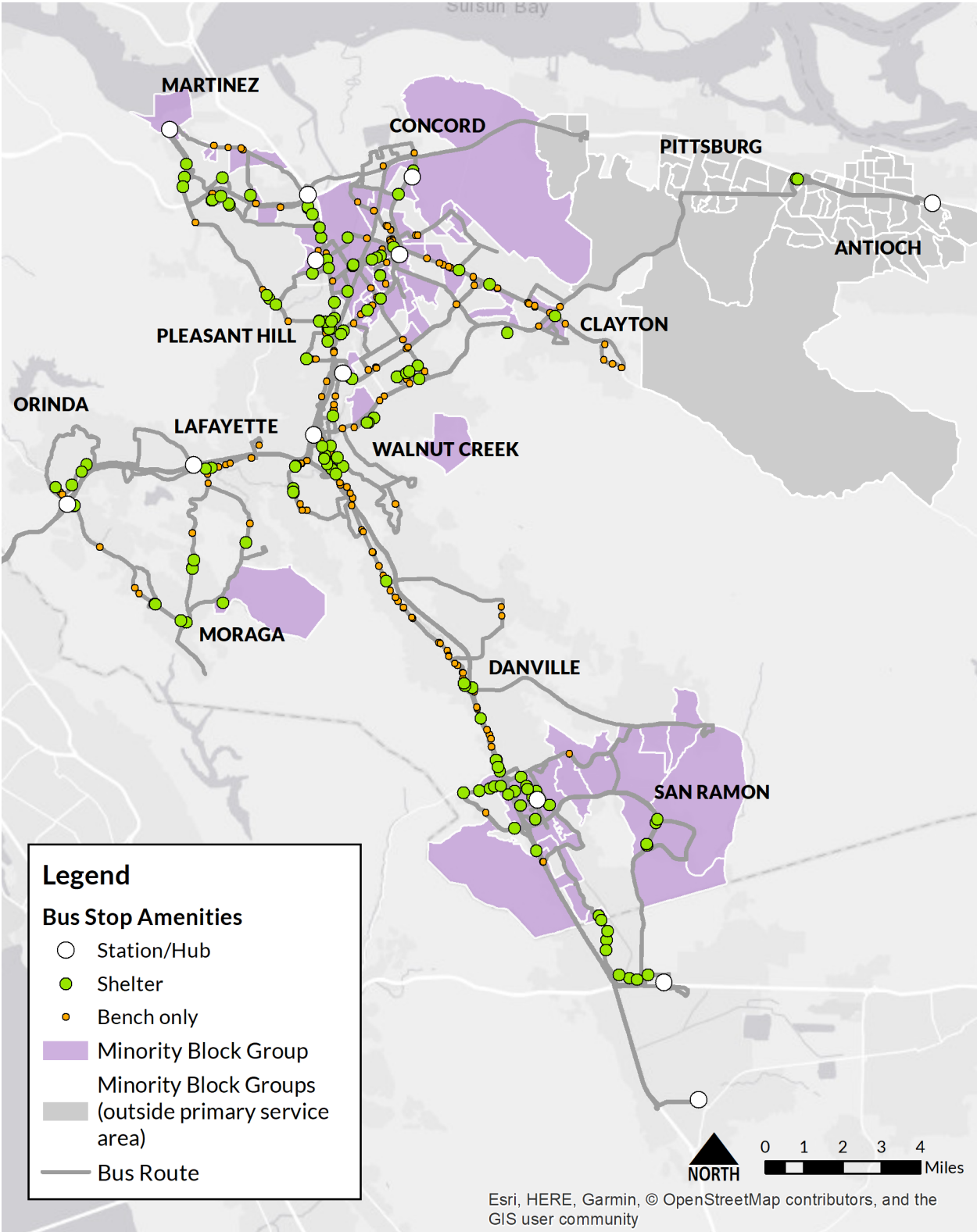
### Standard:

County Connection’s policy states that transit amenities are distributed on a system-wide basis. Transit amenities include shelters and benches. The location of transit amenities is determined by factors such as ridership, individual requests, staff recommendations, and vendor preference (in the case of shelters which feature advertisements). Staff seeks to distribute benches and shelters to match the distribution of minority Census tracts.

### Finding:

Staff has worked with jurisdictions to distribute benches and shelters to match the distribution of minority Census tracts and the map below confirms this correlation. It should be noted that while County Connection provides some service to Eastern Contra Costa County, this is outside of the agency’s primary service area, and stops in East County are instead under the jurisdiction of Tri Delta Transit.

Bus Stop Amenity Locations



## J. POLICY DEVELOPMENT OUTREACH

FTA Circular 4702.1B requires public outreach during development of each large public transportation provider's Major Service Change, Disparate Impact and Disproportionate Burden Policies.

When County Connection considered and adopted these policies, Staff developed draft policies and received public input through three community meetings, with language services available, throughout the County Connection's service area. Comments also were solicited and accepted via County Connection's website.

County Connection held the following community meetings:

- Thursday, March 28, 2013 - 7 p.m. to 9 p.m.  
Monument Corridor Transportation Action Team  
1736 Clayton Rd, Concord, CA 94520
- Monday, April 15, 2013 - 5:30 p.m. to 7:30 p.m.  
San Ramon Community Center  
12501 Alcosta Blvd, San Ramon, CA 94583
- Tuesday, May 14, 2013 - 1:30 p.m. to 5 p.m.  
Walnut Creek Library  
1644 N Broadway, Walnut Creek, CA 94596

The meetings participants provided valuable comments for staff. Upon receipt of the input from public outreach, staff revised the proposals for its policies and submitted them for Board approval. They were approved June 20, 2013.

## K. TITLE VI EQUITY ANALYSES

In the past three years, County Connection has conducted equity analyses for the following fare or service changes:

- [Elimination of Route 3 and Implementation of Route 99X in Martinez](#)
- [2019 Service Restructure Plan](#)
- [2019 Fare Restructure](#)
- [Monument Free Program](#)
- [Clipper START and Youth Fare](#)
- [2021 Service Plan](#)

*Links to each Board-approved equity analysis are provided above. Full copies of the documents will be attached when submitting the report to FTA following Board adoption.*

**RESOLUTION NO. 2022-011**

**BOARD OF DIRECTORS, CENTRAL CONTRA COSTA TRANSIT AUTHORITY  
STATE OF CALIFORNIA**

**\* \* \***

**ADOPTING THE CCCTA 2021 TITLE VI PROGRAM REPORT**

WHEREAS, the County of Contra Costa and the Cities of Clayton, Concord, the Town of Danville, Lafayette, Martinez, the Town of Moraga, Orinda, Pleasant Hill, San Ramon and Walnut Creek (hereinafter "Member Jurisdictions") have formed the Central Contra Costa Transit Authority ("CCCTA"), a joint exercise of powers agency created under California Government Code Section 6500 *et seq.*, for the joint exercise of certain powers to provide coordinated and integrated public transportation services within the area of its Member Jurisdictions;

WHEREAS, Title VI of the Civil Rights Act of 1964 requires recipients of federal grants and other assistance to operate their programs and services without regard to, or discrimination based on, race, color or national origin;

WHEREAS, the Federal Transit Administration (FTA) issued Circular FTA C 4702.1B, effective October 1, 2012, setting forth requirements and guidelines for Title VI compliance;

WHEREAS, the above-referenced Circular details required elements of a Title VI Program Report, which each recipient of FTA grants and assistance must submit to the FTA every three years to evidence compliance with Title VI;

WHEREAS, CCCTA's current Title VI Program expires on in 2021, therefor necessitating submittal of an updated program report to the FTA;

WHEREAS, staff has developed a proposed Title VI Program Report (provided to the Board via staff report), evidencing CCCTA's compliance with Title VI, for Board consideration and approval; and

WHEREAS, the Marketing, Planning & Legislative Committee has recommended the Board adopt the proposed Title VI Program.

NOW, THEREFORE, BE IT RESOLVED that the Board of Directors of the Central Contra Costa Transit Authority hereby adopts the CCCTA 2021 Title VI Program as set forth in the CCCTA Title VI Program Report; and

BE IT FURTHER RESOLVED that the Board of Directors authorizes the General Manager, or his designee, to:

1. Include evidence of the Board's consideration and approval of the CCCTA Title VI Program in the final CCCTA Title VI Program Report;
2. Submit the final CCCTA Title VI Program to the FTA; and
3. Take any other steps necessary to give effect to this Resolution, including responding to any follow-up inquiries from the FTA.

Regularly passed and adopted this 21st day of October, 2021 by the following vote:

AYES:

NOES:

ABSTENTIONS:

ABSENT:

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Dave Hudson, Chair, Board of Directors

ATTEST:

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Lathina Hill, Clerk to the Board