

To: Marketing, Planning, & Legislative Committee

Date: 02/21/2024

From: Melody Reeb, Director of Planning, Marketing, & Innovation

Reviewed by: *MR*

SUBJECT: Draft 2024 Title VI Program Update

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 October 2021. This update covers the period from 2022 through 2024.

Program Updates:

The most significant changes in this triennial 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 onboard passenger survey conducted in October and November 2023 as well as Census Block Group data from the 2022 American Community Survey (ACS) to analyze service area demographics, including race and income. The analysis concluded that all service standards and policies were met.

Onboard survey and Census data were also used 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 2021, County Connection has conducted three 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:

Staff recommends that the MP&L Committee review and approve the Draft 2024 Title VI Program. The report is being reviewed by legal counsel, and any revisions will be incorporated into a final version for Board review and approval.

Action Requested:

Staff requests that the MP&L Committee forward this item to the Board for approval and adoption.

Attachments:

Attachment 1: Draft 2024 Title VI Program Report

CENTRAL CONTRA COSTA TRANSIT AUTHORITY

Title VI Program Report

To be adopted March 2024

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 2022 through 2024.

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 Approval of Title VI Program

- 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 one Title VI complaint during the review period. However, the complaint was incomplete, and County Connection was unable to reach the person who filed the complaint despite multiple attempts. 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. Three seats are currently filled, and eight 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 1:00 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 Approval of Title VI Program

The Board resolution approving this Title VI Program Report 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 2018-2022 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 2023 On-Board Survey 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 all nine "Safe Harbor" languages identified in the Language Assistance Plan. 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 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.

Translations

Spanish

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 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.

Chinese

中部 Contra Costa 交通局 (County Connection) 同意其在中部康特拉科斯塔縣(Central Contra Costa)的交通服務的平等使用權。County Connection 致力於在開展業務時實行非歧視政策，包括 1964 年《民權法》第六篇規定的責任，其規定，任何人不會因種族、膚色或原國籍的原因，在接受公共交通服務計劃中，被排除參與、被拒絕獲益或受到歧視。有關 County Connection 第六篇計劃的信息，請查閱網站 countyconnection.com 或致電 925-676-7500 (TTY 致電 711)。

任何人如果認為自己在使用公共交通服務方面因種族、膚色或原國籍受到歧視，都有權在指稱事件發生後 180 天內提出投訴。您可以下載下面的投訴表或致電 925-676-7500 (TTY 致電 711)索取投訴表。投訴人可將投訴直接提交至聯邦交通管理局 (Federal Transit Administration) ，具體做法是將投訴提交至公民權利辦公室 (Office of Civil Rights) : Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590。

如需其他語言的信息，請致電 925-676-7500。

Korean

Central Contra Costa Transit Authority (County Connection)는 Central Contra Costa 의 운송 서비스에 대한 동등한 접근 권한을 부여합니다. County Connection 은 1964 년 민권법 Title VI 에 의거한 책임을 포함하여 사업 수행에 있어 대중 교통 서비스 제공 프로그램에 참여하지 못하거나,

혜택을 받지 못하거나 차별을 두지 않는다는 정책에 전념하고 있습니다. County Connection 타이틀 VI 프로그램에 대한 정보는 countyconnection.com 을 방문하거나 925-676-7500(TTY 711)으로 전화하십시오.

대중 교통 서비스 제공과 관련하여 인종, 피부색 또는 출신 국가에 따라 차별을 받았다고 생각하는 사람은 사건 발생 후 180 일 이내에 불만을 제기할 권리가 있습니다. 아래에서 불만 사항 양식을 다운로드하거나 925-676-7500(TTY 711)으로 전화하여 요청할 수 있습니다. 고발자는 인권 사무국을 통해 연방 교통국에 직접 고발사항을 접수할 수 있습니다. 접수 주소는 다음과 같습니다. Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590

다른 언어로 된 정보가 필요하시면 925-676-7500 번으로 문의하십시오.

Farsi

سنترل کونتر کونتر ترانزیت اتوریٹی (کونتی کنیکشن) دسترسی مساوی به خدمات حمل و نقل خود در سنترل کونتر کونتر کونتر اعطا میکند. کونتی کنیکشن متعهد به یک پالیسی عدم تبعیض در انجام امور تجارت خود است، از جمله مسئولیت های خود تحت عنوان VI قانون حقوق مدنی سال 1964 (Title VI of the Civil Rights Act of 1964)، که فراهم می دارد هیچکس نباید، به دلیل نژاد، رنگ یا مبدای ملی از مشارکت محروم شود، از مزایای آن انکار شود یا مورد تبعیض تحت برنامه ارائه خدمات حمل و نقل خود قرار می گیرد حذف نمی شود. تحت مشارکت، محرومیت از مزایای، یا تحت تبعیض تحت برنامه ارائه خدمات حمل و نقل خود قرار می گیرد. برای اطلاعات بر کونتی کنیکشن در مورد برنامه عنوان VI، به سایت countyconnection.com دیدن کنید یا به این شماره 925-676-7500 (TTY 711) زنگ بزنید.

هر شخصی که معتقد است بر اساس نژاد، رنگ یا مبدای ملی در ارتباط با ارائه خدمات ترانزیت مورد تبعیض قرار گرفته است، میتواند به ظرف 180 روز از حادثه ادعایی شکایت کند. شما میتوانید فرم شکایت را در زیر بارگیری کرده یا با شماره 925-676-7500 (TTY 711) درخواست کنید. شاکي همچنین میتواند از طریق اداره حمل و نقل فدرال: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590

اگر اطلاعات به زبانی دیگر مورد نیاز است، با شماره 925-676-7500 تماس بگیرید.

Tagalog

Nagkakaloob ang Central Contra Costa Transit Authority (County Connection) ng pantay-pantay na paggamit sa mga serbisyo ng transportasyon nito sa Central Contra Costa. Nakatalaga ang County Connection sa isang polisiya ng walang diskriminasyon sa pagsasagawa ng trabaho nito, kabilang ang mga responsibilidad nito sa ilalim ng Titulo VI ng Civil Rights Act ng 1964, kung saan itinatakda na walang tao, dahilan sa lahi, kulay o bansang pinagmulan, ang matatanggal mula sa paglahok, matatanggihan ng mga benepisyo, o makakaranas ng diskriminasyon sa ilalim ng programa nitong paghahatid ng mga serbisyo ng transportasyon. Para sa impormasyon tungkol sa County Connection Title VI Program, bumisita sa countyconnection.com o tumawag sa 925-676-7500 (TTY 711).

Ang sinumang tao na naniniwalang nakaranas sila ng diskriminasyon dahil sa lahi, kulay o bansang pinagmulan patungkol sa paghahatid ng mga serbisyo ng transportasyon ay may karapatang maghain ng reklamo sa loob ng 180 araw ng sinabing insidente. Maaari ninyong i-download ang pormularyo ng reklamo na nasa ibaba o humiling nito sa pamamagitan ng pagtawag sa 925-676-7500 (TTY 711). Ang isang nagrereklamo ay maaaring direktang maghain ng reklamo sa Federal Transit Administration sa pamamagitan ng paghahain ng reklamo sa Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590

Kung kinakailangan ang impormasyon sa iba pang wika, makipag-ugnayan sa 925-676-7500.

Russian

Транспортное управление Центрального района округа Контра-Коста (County Connection) предоставляет равный доступ к своим транспортным услугам в Центральном районе округа Контра-Коста. County Connection придерживается политики недискриминации при ведении своей деятельности, включая обязанности в соответствии с разделом VI Закона США о гражданских правах 1964 г., который предусматривает, что ни одному лицу не может быть отказано в участии или льготах и никто не может подвергаться дискриминации по признаку расы, цвета кожи или национального происхождения в рамках программы предоставления транзитных услуг района. Для получения информации о программе County Connection в соответствии с разделом VI посетите сайт countyconnection.com или позвоните по тел. 925-676-7500 (TTY 711).

Любой человек, считающий, что подвергся дискриминации по признаку расы, цвета кожи или национального происхождения в отношении предоставления транспортных услуг, имеет право

подать жалобу в течение 180 дней с момента предполагаемого инцидента. Вы можете загрузить форму жалобы ниже или запросить ее, позвонив по телефону (925)676-7500 (телетайп 711). Заявитель может подать жалобу непосредственно в Федеральную транспортную администрацию, отправив ее в Отдел по защите гражданских прав на имя координатора программы: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590

За информацией на других языках обращайтесь по тел. 925-676-7500.

Vietnamese

Cơ quan Vận chuyển Trung tâm Contra Costa (Central Contra Costa Transit Authority (County Connection)) cung cấp sự tiếp cận bình đẳng đến các dịch vụ vận chuyển của chúng tôi tại Trung tâm Contra Costa. County Connection cam kết thực hiện chính sách không phân biệt đối xử trong hoạt động kinh doanh của chúng tôi, bao gồm các trách nhiệm theo Tiêu đề VI của Đạo luật Dân Quyền năm 1964, quy định rằng không ai có thể bị loại trừ vì lý do chủng tộc, màu da hoặc nguồn gốc quốc gia, bị từ chối cho tham gia, bị từ chối các lợi ích hoặc bị phân biệt đối xử trong chương trình cung cấp dịch vụ vận chuyển. Để biết thông tin về Chương trình Tiêu đề của County Connection, hãy truy cập vào countyconnection.com hoặc gọi số 925-676-7500 (TTY 711).

Bất cứ người nào tin rằng họ đã bị phân biệt đối xử dựa trên chủng tộc, màu da hoặc nguồn gốc quốc gia liên quan đến việc cung cấp dịch vụ vận chuyển có quyền nộp đơn khiếu nại trong vòng 180 ngày kể từ ngày xảy ra vụ việc bị cáo buộc. Bạn có thể tải xuống mẫu đơn khiếu nại bên dưới hoặc yêu cầu bằng cách gọi đến số 925-676-7500 (TTY 711). Người khiếu nại có thể nộp trực tiếp đơn khiếu nại cho Ban Quản Lý Vận Tải Liên Bang bằng cách nộp đơn khiếu nại cho Văn Phòng Dân Quyền, Người Nhận: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590

Nếu cần thông tin bằng ngôn ngữ khác, hãy liên hệ 925-676-7500.

Hindi

सेंट्रल कॉन्ट्रा कोस्टा ट्रांज़िट अथॉरिटी (काउंटी कनेक्शन) सेंट्रल कॉन्ट्रा कोस्टा में अपनी परिवहन सेवाओं तक एकसमान पहुँच प्रदान करती है। काउंटी कनेक्शन अपने व्यवसाय के संचालन में गैर-भेदभाव की नीति के लिए प्रतिबद्ध है, जिसमें इसकी 1964 के नागरिक अधिकार अधिनियम के टाइटल VI (Title VI of the Civil

Rights Act of 1964) के तहत दी गई जिम्मेदारियां शामिल हैं, जो निर्दिष्ट करता है कि किसी भी व्यक्ति को, जाति, वर्ण या राष्ट्रीय मूल के आधार पर, इसके ट्रांज़िट (परिवहन) सेवाओं को उपलब्ध कराने के कार्यक्रम में भागीदारी से अलग नहीं किया जाएगा, उसके लाभ से वंचित नहीं किया जाएगा, या उसके साथ भेदभाव नहीं किया जाएगा। काउंटी कनेक्शन टाइटल VI प्रोग्राम (कार्यक्रम) के बारे में जानकारी के लिए, countyconnection.com पर जाएं या 925-676-7500 (TTY 711) पर कॉल करें।

कोई भी व्यक्ति जो यह मानता है कि ट्रांज़िट सेवाओं को उपलब्ध कराने के संबंध में नस्ल, वर्ण या राष्ट्रीय मूल के आधार पर उसके साथ भेदभाव किया गया है, उसे कथित घटना के 180 दिनों के अंदर शिकायत दर्ज कराने का अधिकार है। आप नीचे शिकायत फ़ॉर्म डाउनलोड कर सकते हैं या इसके लिए 925-676-7500 (TTY 711) पर कॉल करके अनुरोध कर सकते हैं। एक शिकायतकर्ता नागरिक अधिकार कार्यालय के ध्यान हित, शिकायत दर्ज करके सीधे फ़ैडरल ट्रांज़िट एडमिनिस्ट्रेशन में शिकायत दर्ज कर सकता/सकती है: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590

यदि किसी अन्य भाषा में जानकारी चाहिए, तो 925-676-7500 पर संपर्क करें।

Arabic

تمنح سلطة نقل كونترا كوستا المركزية (وكالة كونتي كونكشن) المساواة لجميع المواطنين في الوصول إلى خدمات النقل في كونترا كوستا. تلتزم الوكالة بسياسة عدم التمييز في تسيير أعمالها، بما في ذلك مسؤولياتها بموجب الباب السادس من قانون الحقوق المدنية لعام 1964 الذي ينص على أنه لا يجوز استبعاد أي شخص، على أساس العرق أو اللون أو الأصل القومي، من المشاركة، أو الحرمان من الفوائد، أو التعرض للتمييز في إطار برنامجها لتقديم خدمات النقل.

للحصول على معلومات حول برنامج County Connection Title VI، تفضل بزيارة الموقع: countyconnection.com أو اتصل بالرقم 925-676-7500 (TTY 711).

يحق لأي شخص يعتقد أنه تعرض للتمييز بسبب العرق أو اللون أو الأصل القومي فيما يتعلق بتلقي خدمات النقل تقديم شكوى في غضون مائة وثمانين (180) يومًا من الحادثة المزعومة. يمكنك تنزيل نموذج شكوى أدناه أو طلب نموذج بالاتصال بالرقم 925-676-7500 (TTY 711). يمكنك أيضًا تقديم شكوى إلى إدارة النقل الفيدرالية عن طريق تقديم الشكوى إلى مكتب الحقوق المدنية، Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590

إذا كانت المعلومات مطلوبة بلغة أخرى، فاتصل بالرقم 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?

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

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. 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.

Translations

County Connection's Title VI Complaint Procedures and Form are translated into all nine "Safe Harbor" languages identified in the Language Assistance Plan.

Spanish

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. 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.

Chinese

如果您认为在接受交通服务时遭受有关种族、肤色或民族血统的歧视，您即拥有将标题六投诉提交至交通局的公民权利管理员处的权利。联邦和州法律要求在最近发生歧视之日起的 180 天内提交投诉。您可以访问 countyconnection.com 下载投诉表格。您还可以致电客户服务人员并要求通过邮寄的方式索取标题六投诉表格。您还可以提交包含下列所有信息的书面声明。应将投诉邮寄或送至：

County Connection
Director of Recruitment & Employee Development
2477 Arnold Industrial Way
Concord, CA 94520

所有投诉应包含下列信息：

1. 投诉人的姓名、地址以及电话号码。
2. 投诉依据（如种族、肤色或民族血统）。
3. 发生所称歧视事件的日期。
4. 导致投诉人认为遭受歧视的事件的性质。
5. 事件所涉及人员的姓名、地址和电话号码。
6. 曾受理所提交投诉的其他机构或法庭以及联系人姓名。

Korean

인종, 피부색 또는 출신 국가로 인해 대중교통 이용에 있어 차별적 대우를 받았다고 생각하신다면 인권 사무국 담당자를 통해 Title VI 고발 사항을 접수하실 권리가 있습니다. 연방, 주 정부 법은 고발 사항이 사건 발생 이후 180 일 이내에 접수되도록 규정하고 있습니다. countyconnection.com 에서 고발 양식을 다운로드하시거나 고객 상담 번호로 전화하셔서 Title VI 고발 접수 양식을 우편 배송하도록 요청하실 수 있습니다. 또는 아래 모든 사항을 포함하는 서면진술서를 제출하실 수도 있습니다. 다음 주소로 고발 사항을 보내주십시오.

County Connection
Director of Recruitment & Employee Development
2477 Arnold Industrial Way
Concord, CA 94520

모든 고발 사항 제출서에는 다음 정보가 포함되어야 합니다.

1. 고발자 이름, 주소, 전화번호.
2. 고발 내용(예: 인종, 피부색, 출신 국가).
3. 해당 사건 발생일.
4. 차별이 발생했다고 생각하게 만든 사건의 본질.
5. 사건 목격자(들)의 이름, 주소, 전화번호.
6. 고발 사항이 접수된 기타 기관 또는 법원과 담당자 이름.

Farsi

اگر فکر می کنید در رابطه با دریافت خدمات جابجایی و حمل و نقل بر اساس نژاد، رنگ پوست یا ملیتتان مورد تبعیض قرار گرفته اید، از این حق برخوردارید تا یک شکایت بخش VI را به مجری خدمات حمل و نقل ارائه کنید. بر اساس قانون فدرال و ایالتی لازم است که در مدت زمان صد و هشتاد (180) روز از زمان بروز حادثه مربوطه، شکایتتان را مطرح کنید. با بازدید از سایت countyconnection.com می توانید فرم شکایت را پر کنید. همچنین می توانید با خدمات مشتری تماس بگیرید و درخواست کنید یک فرم شکایت بخش VI برایتان پست شود. همچنین می توانید یک بیانیه کتبی شامل همه اطلاعات فهرست شده در زیر ارائه کنید. شکایت ها را باید پست کرده یا شخصاً به این آدرس تحویل دهید:

County Connection
Director of Recruitment & Employee Development
2477 Arnold Industrial Way
Concord, CA 94520

همه شکایت ها باید شامل اطلاعات زیر باشند:

1. نام، آدرس و شماره تلفن فرد شاکی.
2. دلیل شکایت (مثل نژاد، رنگ پوست یا ملیت).
3. تاریخ بروز حادثه تبعیض آمیز.
4. نوع حادثه که منجر به بروز شکایت شده است و احساس می کنید که تبعیضی صورت گرفته است.
5. نام، آدرس و شماره تلفن افرادی که ممکن است از حادثه روی داده مطلع باشند.
6. سایر آژانس ها یا دادگاه ها که شکایت در آنها مطرح شده است و نام طرف تماس.

Tagalog

Kung naniniwala kang nakatanggap ka ng pakikitungong may-diskriminasyon batay sa lahi, kulay o bansang pinagmulan kaugnay sa paghahatid ng mga serbisyong transportasyon, may karapatan kang maghain ng reklamo sa Title VI sa Civil Rights Administrator ng Authority. Hinihingi ng mga batas na Pederal at Pang-estado na ihain ang mga reklamo sa loob ng isangdaan at walumpung (180) araw sa kalendaryo mula sa sinasabing insidente. Maaari mong i-download ang form para sa paghain ng reklamo sa pamamagitan ng pagbisita sa countyconnection.com. Maaari ka ring tumawag sa customer service at hilinging mapadalhan ka sa koreo ng form ng reklamo sa Title VI. Maaari mo ring isumite ang isang nakasulat na pahayag na naglalaman ng lahat ng impormasyong nakalista sa ibaba. Dapat ipakoreo o ipahatid ang mga reklamo sa:

County Connection

Director of Recruitment & Employee Development

2477 Arnold Industrial Way

Concord, CA 94520

Dapat kasama sa lahat ng reklamo ang mga sumusunod na impormasyon:

1. Pangalan, address, at numero ng telepono ng nagrereklamo.
2. Ang batayan ng reklamo; (hal., lahi, kulay, o bansang pinagmulan).
3. Ang (mga) petsa kung kailan nangyari ang sinasabing pangyayaring may diskriminasyon.
4. Ang uri ng insidente na nagbigay-daan upang maramdaman ng nagrereklamo na isang salik ang diskriminasyon.
5. Mga pangalan, address at numero ng telepono ng mga taong maaaring may alam sa pangyayari.
6. Iba pang ahensiya o hukuman kung saan maaaring inihain ang reklamo at pangalan ng nakaugnayan.

Russian

Если вы считаете, что при получении транспортных услуг столкнулись с дискриминацией по признаку расы, цвета кожи или национального происхождения, вы имеете право подать жалобу о нарушении положений Раздела VI администратору Отдела по защите гражданских прав. Согласно федеральным законам и законам штата, жалоба должна быть подана в течение 180 (ста восьмидесяти) календарных дней с момента последнего предполагаемого инцидента. Форму жалобы можно загрузить с сайта countyconnection.com. Вы также можете позвонить в центр обслуживания клиентов и попросить отправить вам по почте форму жалобы о нарушении положений Раздела VI. Вы также можете подать письменное заявление, содержащее все указанные ниже сведения. Жалобы необходимо отправлять или доставлять по адресу:

County Connection
Director of Recruitment & Employee Development
2477 Arnold Industrial Way
Concord, CA 94520

Все жалобы должны содержать следующую информацию:

1. Имя, адрес и номер телефона заявителя.
2. Основание для жалобы (дискриминация по расе, цвету кожи или национальному происхождению).
3. Дата предполагаемого случая дискриминации.
4. Характер инцидента, во время которого заявитель почувствовал, что столкнулся с дискриминацией.
5. Имена, адреса и номера телефонов лиц, которые могут быть осведомлены об этом событии.
6. Другие учреждения или суды, в которые могли быть поданы жалобы, и имена контактных лиц.

Vietnamese

Nếu quý vị cho rằng mình bị phân biệt đối xử dựa trên chủng tộc, màu da hoặc nguồn gốc quốc gia về vấn đề cung cấp dịch vụ vận tải, quý vị có quyền nộp đơn khiếu nại Tiêu Đề VI cho Người Quản Lý Dân Quyền của Cơ Quan. Luật Liên Bang và Tiểu Bang yêu cầu đơn khiếu nại phải được nộp trong vòng một trăm tám mươi (180) ngày theo lịch kể từ khi xảy ra sự cố bị cáo buộc gần đây nhất. Quý vị cũng có thể tải về mẫu đơn khiếu nại bằng cách truy cập countyconnection.com. Quý vị cũng có thể gọi cho dịch vụ khách hàng và yêu cầu họ gửi cho quý vị mẫu đơn khiếu nại Tiêu Đề VI qua thư. Quý vị cũng có thể gửi văn bản tuyên bố có chứa tất cả thông tin được liệt kê bên dưới. Nên gửi đơn khiếu nại qua thư hoặc chuyển đến:

County Connection
Director of Recruitment & Employee Development
2477 Arnold Industrial Way
Concord, CA 94520

Tất cả các đơn khiếu nại phải bao gồm thông tin sau:

1. Tên, địa chỉ và số điện thoại của người khiếu nại.
2. Cơ sở khiếu nại; (ví dụ: chủng tộc, màu da hoặc nguồn gốc quốc gia).
3. (Những) ngày xảy ra sự kiện phân biệt đối xử bị cáo buộc.
4. Bản chất của sự cố khiến cho người khiếu nại cảm thấy bị phân biệt đối xử là một yếu tố.
5. Tên, địa chỉ và số điện thoại của những người có thể biết sự kiện.
6. Các cơ quan hoặc tòa án khác, nơi có thể nộp đơn khiếu nại và tên liên hệ.

Hindi

यदि आपको लगता है कि ट्रांज़िट सेवाएं देते समय आपके साथ जाति, रंग या राष्ट्रीय मूल के आधार पर भेदभाव का व्यवहार किया गया है, तो आपको अथॉरिटी के नागरिक अधिकारों के प्रशासक के पास टाइटल VI शिकायत दर्ज करने का अधिकार है। फ़ैडरल तथा स्टेट के कानून अपेक्षा करते हैं कि पिछली कथित घटना के एक सौ अस्सी (180) कैलेंडर दिनों के भीतर शिकायतें दर्ज की जाएं। आप countyconnection.com पर जाकर शिकायत संबंधी फ़ार्म डाउनलोड कर सकते हैं। आप ग्राहक सेवा पर भी कॉल कर सकते हैं और आपको टाइटल VI शिकायत संबंधी फ़ार्म डाक द्वारा भेजने के लिए कहें। आप लिखित बयान भी जमा कर सकते हैं, जिसमें नीचे दी गई सारी जानकारी होनी चाहिए। शिकायतें दिए गए पते पर डाक द्वारा भेजी जानी चाहिए:

County Connection
Director of Recruitment & Employee Development
2477 Arnold Industrial Way
Concord, CA 94520

सभी शिकायतों में निम्नलिखित जानकारी शामिल होनी चाहिए:

1. शिकायतकर्ता का नाम, पता और टैलिफोन नंबर।
2. शिकायत का आधार; (जैसे जाति, रंग या राष्ट्रीय मूल)।
3. जिस तिथि(यों) पर कथित भेदभाव वाली घटना घटी थी।
4. घटना की प्रकृति, जिसमें शिकायतकर्ता को महसूस हुआ भेदभाव का कारक शामिल था।
5. उन व्यक्तियों के नाम, पते और टैलिफोन नंबर, जिन्हें घटना की जानकारी हो सकती है।
6. अन्य ऐजेंसियां या अदालतें, जहाँ शिकायत दर्ज की जा सकती है और एक संपर्क नाम।

Arabic

إذا كنت تعتقد أنك قد تعرضت للتمييز بسبب العرق أو اللون أو الأصل القومي فيما يتعلق بتقديم خدمات النقل، فيحق لك تقديم شكوى بموجب الباب السادس إلى مدير الحقوق المدنية بالسلطة. تتطلب القوانين الفيدرالية وقوانين الولايات تقديم الشكاوى في غضون مائة وثمانين (180) يومًا تقويميًا من آخر حادثة تمييز مزعومة. يمكنك تنزيل نموذج شكوى عن طريق زيارة countyconnection.com. يمكنك أيضًا الاتصال بخدمة العملاء وطلب إرسال نموذج شكوى من الباب السادس إليك بالبريد. يمكنك أيضًا تقديم بيان مكتوب يحتوي على جميع المعلومات الواردة أدناه. يجب إرسال الشكاوى بالبريد أو تسليمها إلى:

County Connection
Director of Recruitment & Employee Development
2477 Arnold Industrial Way
Concord, CA 94520

يجب أن تتضمن جميع الشكاوى المعلومات التالية:

1. اسم وعنوان ورقم هاتف مقدم الشكوى.
2. أساس الشكوى. (على سبيل المثال، العرق أو اللون أو الأصل القومي).
3. التاريخ (التواريخ) الذي وقع فيه حادثة التمييز المزعومة.
4. طبيعة الحادثة التي دفعت مقدم الشكوى إلى الشعور بالتمييز كان عاملاً.
5. أسماء وعناوين وأرقام هواتف الأشخاص الذين قد يكون لديهم علم بالحدث.
6. الوكالات أو المحاكم الأخرى التي ربما تم تقديم شكوى فيها واسم جهة الاتصال.

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.

The purpose of the PPP is:

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

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.

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), 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. In 2023, County Connection purchased 40 new buses that are equipped with digital “infotainment” screens that can be used to display dynamic content.

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. Mobile Lobby

County Connection provides the local community with a pop-up lobby at select locations Monday through Friday. Customer service representatives are available in-person to answer questions about County Connection services and public transit. The calendar for these outreach events can be found on the County Connection website at www.countyconnection.com/mobile-lobby-outreach-events.

6. 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.

7. 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.

8. Interviews

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

9. 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.

10. 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 meetings may additionally be attended virtually through the County Connection website at www.countyconnection.com/meetings. Online public meetings lower the barrier to attendance for public meetings, allowing people who may not be able to travel to an in-person meeting to still participate and give their feedback.

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.

11. 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.

Summary of Outreach Efforts

The table below summarizes County Connection's public outreach efforts between 2021 and 2024.

Campaign	Dates	Outreach Strategies
Clipper START	Oct 2020 – Sep 2021	Public hearing, local newspaper, website, social media, onboard signage, digital ads, eblasts, bus exterior ads, CBOs, local jurisdictions
Youth Clipper	Oct 2020 – Sep 2021	Public hearing, local newspaper, website, social media, onboard signage, eblasts, CBOs, local jurisdictions, school districts
Clipper Mobile App	May 2021 – Sep 2021	Website, social media, flyer, digital ads, bus exterior ads, local jurisdictions
All Aboard Bay Area	Aug 2021 – Sep 2021	Website, social media, digital ads
Free Rides in September	Aug 2021 – Sep 2021	Website, social media, onboard signage, digital ads, CBOs, local jurisdictions
Weekend Monument Free	Jun 2022 – Dec 2022	Public hearing, local newspaper, website, social media, onboard signage, CBOs, local jurisdictions
2023-2028 Short Range Transit Plan	Sep 2022 – Dec 2022	Public hearing, local newspaper, survey, website, social media, onboard signage, CBOs, local jurisdictions
October Free Rides	Sep 2022 – Oct 2022	Website, social media, onboard signage, digital ads, CBOs, local jurisdictions
Route 27 & 99X Consolidation	Apr 2023 – Aug 2023	Public hearing, local newspaper, website, social media, onboard signage, CBOs, local jurisdictions
Clipper Fare Changes	Aug 2023 – ongoing	Public hearing, local newspaper, website, social media, onboard signage, digital ads, CBOs, local jurisdictions, school districts
Onboard Passenger Survey	Oct 2023 – Nov 2023	Survey, website, social media, onboard signage

Campaign	Dates	Outreach Strategies
<i>Continuous/Recurring</i>		
Mobile Lobby	Weekdays	Website, social media, local jurisdictions
Service Changes	Quarterly	Website, social media, onboard signage, CBOs, local jurisdictions
Summer Youth Pass	Annually	Website, social media, onboard signage, digital ads, flyers, eblasts, CBOs, local jurisdictions, school districts
Pass2Class	Annually	Website, social media, onboard signage, digital ads, flyers, eblasts, CBOs, local jurisdictions, school districts

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.

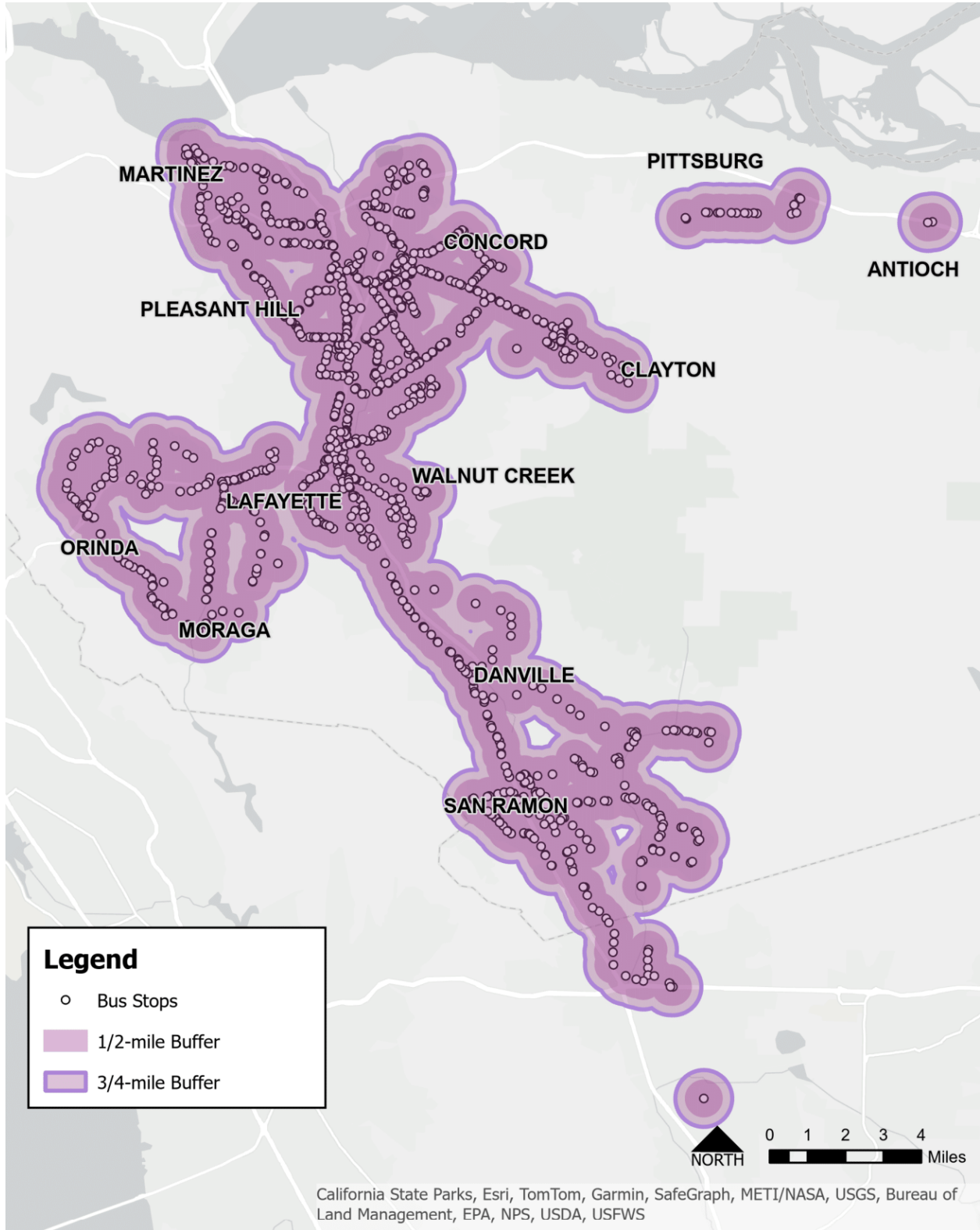
Four Factor Analysis

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) 2018-2022 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, eight 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
- Arabic

Hindi previously met the guidelines of more than 1,000 persons in Central Contra Costa County who speak English less than “very well,” and County Connections currently provides translation of vital documents into Hindi.

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 63,336 residents within the service area who indicated they speak English less than “very well,” representing just over 10 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	433,309	-	-	-
Spanish	74,332	47,851	26,481	4.2%
French, Haitian, or Cajun	4,215	3,558	657	0.1%
German or other West Germanic languages	2,522	2,180	342	0.1%
Russian, Polish, or other Slavic languages ⁽¹⁾	8,593	5,328	3,265	0.5%
Other Indo-European languages ⁽¹⁾	30,338	22,981	7,357	1.2%
Chinese (incl. Mandarin, Cantonese)	25,712	14,468	11,244	1.8%
Korean	6,091	3,474	2,617	0.4%
Vietnamese	3,983	1,584	2,399	0.4%
Tagalog (incl. Filipino)	14,247	10,978	3,269	0.5%
Other Asian and Pacific Island languages ⁽¹⁾	15,817	12,232	3,585	0.6%
Arabic	3,802	2,753	1,049	0.2%
Other and unspecified languages	3,721	2,650	1,071	0.2%
Total	626,682	130,037	63,336	10.1%

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, 2018-2022 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 or Language Group	Total	Speak English "very well"	Speak English less than "very well"	% Speaking English less than "very well"
Speak only English	378,631	-	-	-
Spanish	41,429	28,002	13,427	2.6%
Chinese (incl. Mandarin, Cantonese)	23,737	14,097	9,640	1.8%
Korean	5,720	3,512	2,208	0.4%
Farsi	6,330	3,912	2,418	0.5%
Tagalog (incl. Filipino)	8,172	6,437	1,735	0.3%
Russian	5,869	3,948	1,921	0.4%
Vietnamese	2,763	1,636	1,127	0.2%
Hindi	6,338	5,670	668	0.1%
Other languages	43,296	48,346	9,131	1.7%
Total	522,285	115,560	42,275	8.1%

Source: U.S. Census Bureau, 2017-2021 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. Translations of these documents are included in Appendix A and Appendix B.

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	5,772	7.0%
Mandarin (Putonghua)	375	0.5%
Farsi (Persian)	503	0.6%
Russian	334	0.4%
Arabic	196	0.2%
Korean	149	0.2%
Filipino (Pilipino or Tagalog)	133	0.2%
Telugu	97	0.1%
Cantonese	140	0.2%
Vietnamese	117	0.1%
Hindi	90	0.1%

Language	English Learners	% of Total Enrollment
Portuguese	112	0.1%
Other Languages	1,123	1.4%
Total	9,141	11.0%

Source: California Department of Education, 2022-2023 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 four (4) 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 2023, 41,641 total calls were answered. Of calls answered, 91 calls were interpreted via language line call services, with the majority (60 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 2023
Spanish	55
Mongolian	33
Arabic	1
Korean	1
Mandarin	1
Total	91

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 2023 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 or Language Group	Total	Speak English "very well"	Speak English less than "very well"	% Speaking English less than "very well"
Speak only English	438	-	-	-
Spanish	171	80	91	13.1%
Tagalog/Filipino	26	10	16	2.3%
Chinese	19	6	13	1.9%
Hindi	5	3	2	0.3%
Persian/Farsi	1	1	0	0.0%
<i>Other languages</i>	34	26	8	1.2%
Total	694	126	130	18.7%

Source: 2023 County Connection On-Board Transit Survey

Factor 3:

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

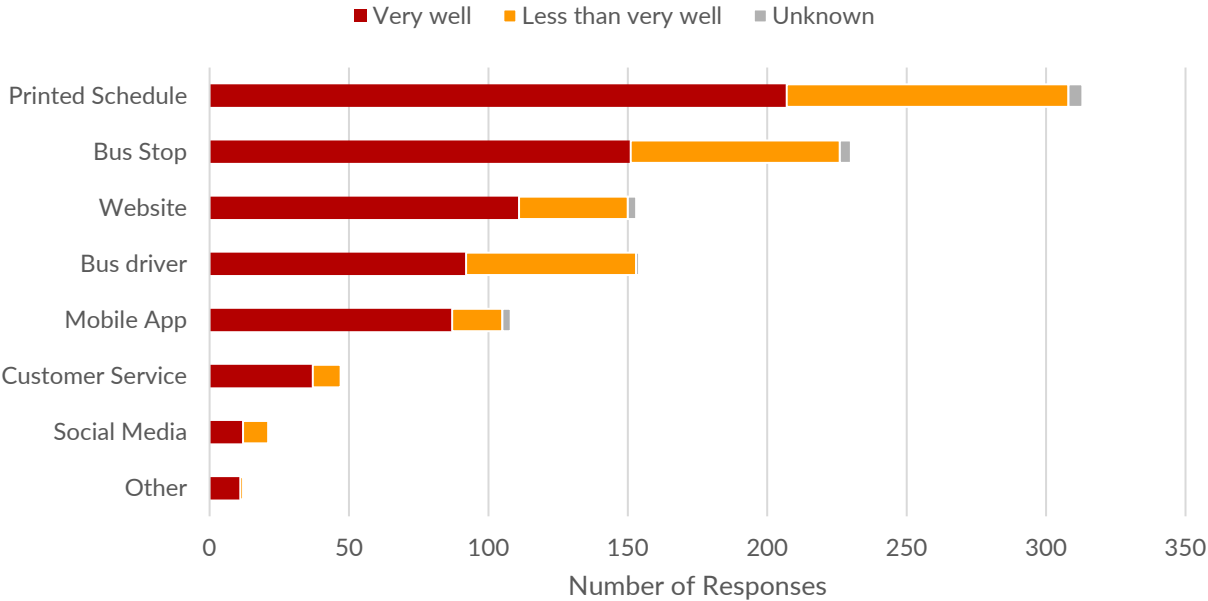
There are a number of key interaction points with the bus system which could prove problematic for LEP populations:

- 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. Printed schedules and information posted at the bus stop are the main sources of information for riders, although bus drivers are disproportionately likely to be the source of information for riders that 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 eight different languages fall within the federal “Safe Harbor” guidelines, County Connection is obligated to expand the translation of vital materials into the following languages:

- Spanish
- Chinese
- Korean
- Persian/Farsi
- Tagalog/Filipino
- Russian
- Vietnamese
- 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. County Connection also currently provides translation of vital materials into Hindi, which was identified as falling within the federal “Safe Harbor” guidelines during previous updates.

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: \$2,000
- Schedules/Graphics: \$70,000
- Market research: \$60,000 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. Eight language groups (Spanish, Chinese, Korean, Persian/Farsi, Tagalog/Filipino, Russian, Vietnamese, 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 smartphones 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 eight “Safe Harbor” languages, as well as Hindi, identified in the analysis:

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

- Title VI Complaint Form.

Translations of these documents are included in Appendix A and Appendix B.

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 RESOLUTIONS

Board Resolutions for the FTA required standards and policies are attached. Additionally, the Board resolution for the approval of the 2024 Title VI Program Update will be included upon adoption.

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 born 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

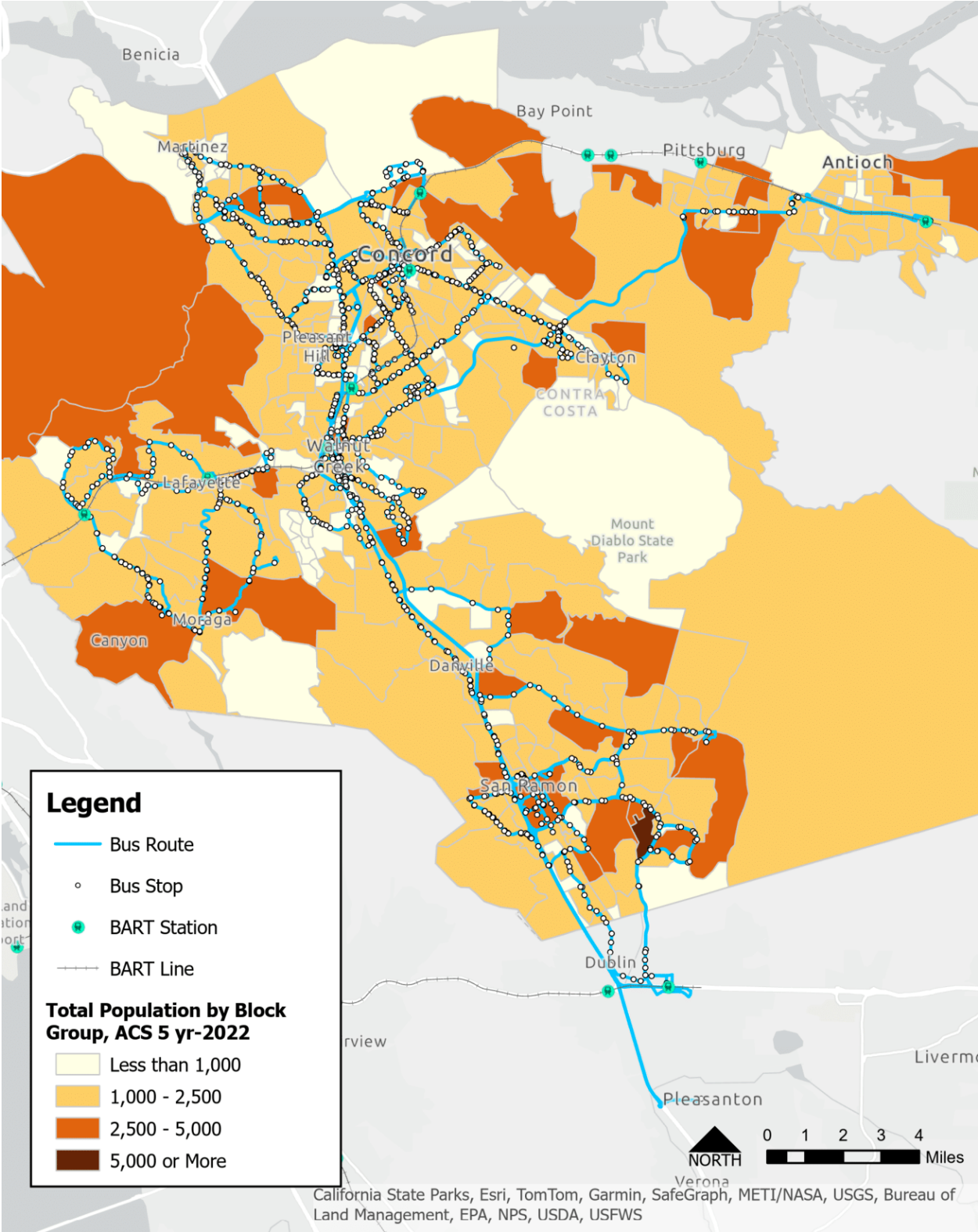
County Connection's service area is the central portion of Contra Costa County and includes the cities of Concord, Pleasant Hill, Martinez, Walnut Creek, Clayton, Lafayette, Orinda, Moraga, Danville, and San Ramon. Segments of some routes operate within Alameda County. However, for the purposes of this 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 2018-2022 ACS 5-year Estimates. This analysis uses the following definitions:

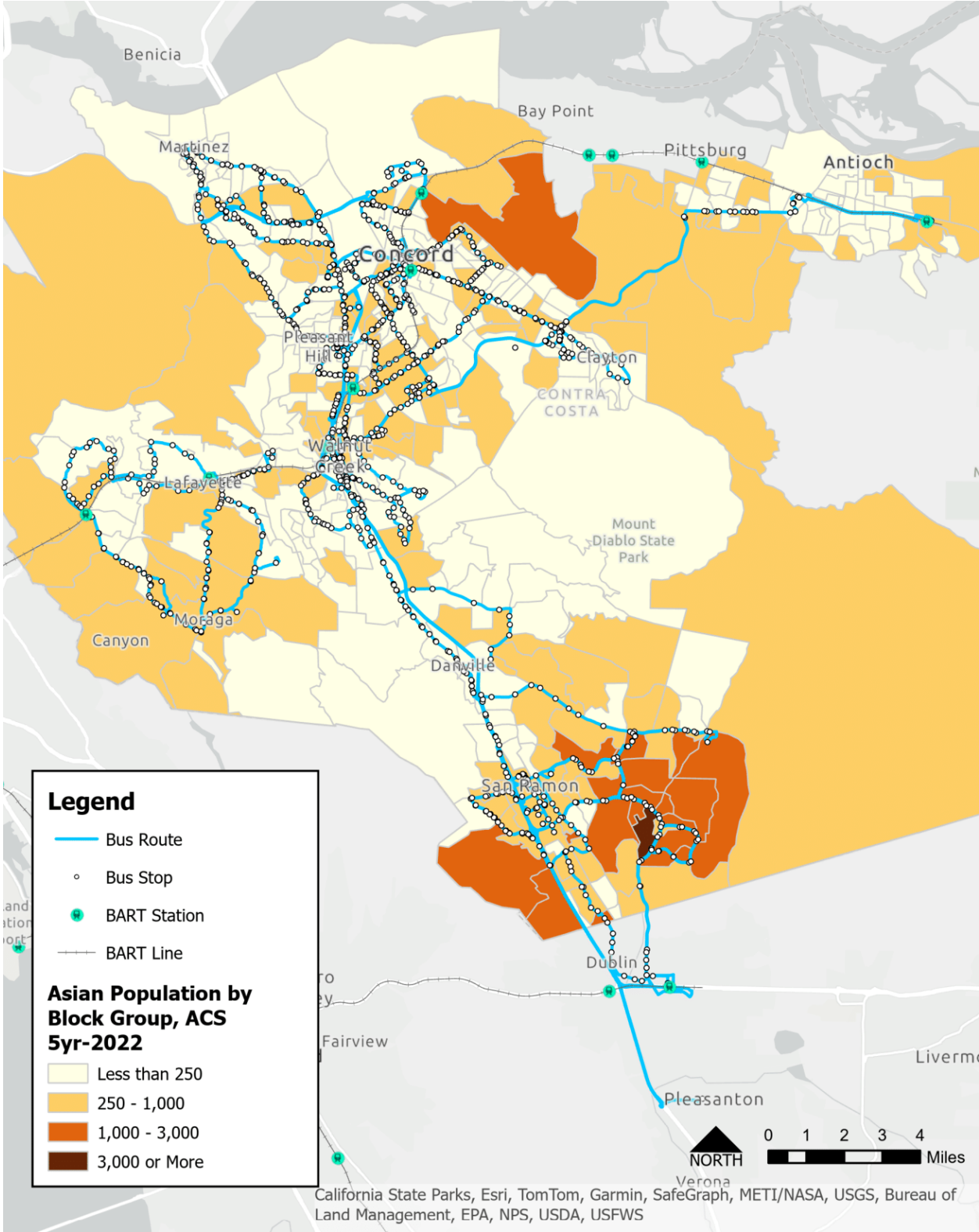
- **Minority** – FTA defines a minority person as anyone who is American Indian or Alaska Native, Asian, Black or African American, Hispanic or Latino, or Native Hawaiian or other Pacific Islander.
- **Low-Income** – FTA defines a low-income person as a person whose household income is at or below the 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, 50.2% of the overall population within County Connection's service area identifies as minority, and 10.8% 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.

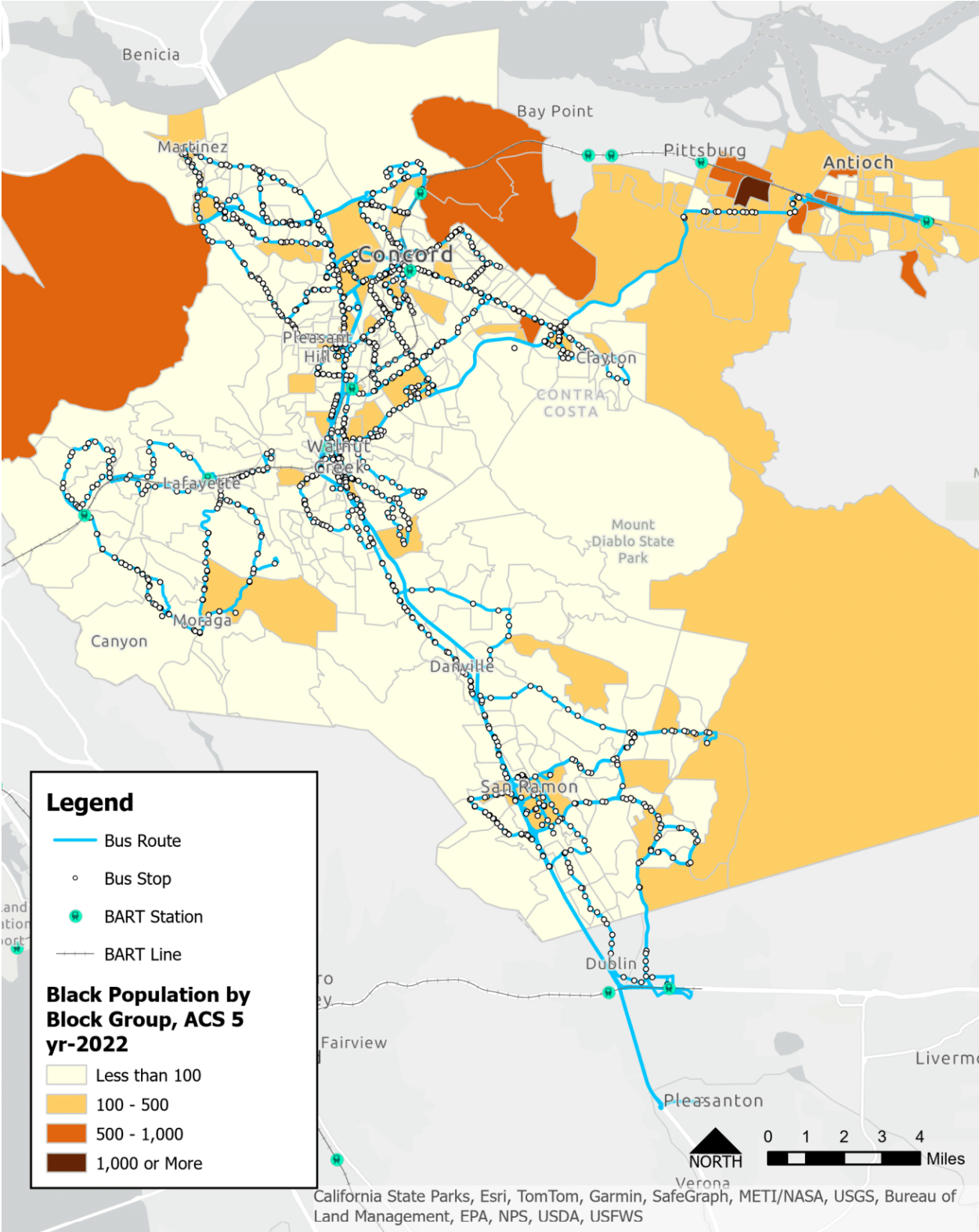
Total Population by Census Block Group



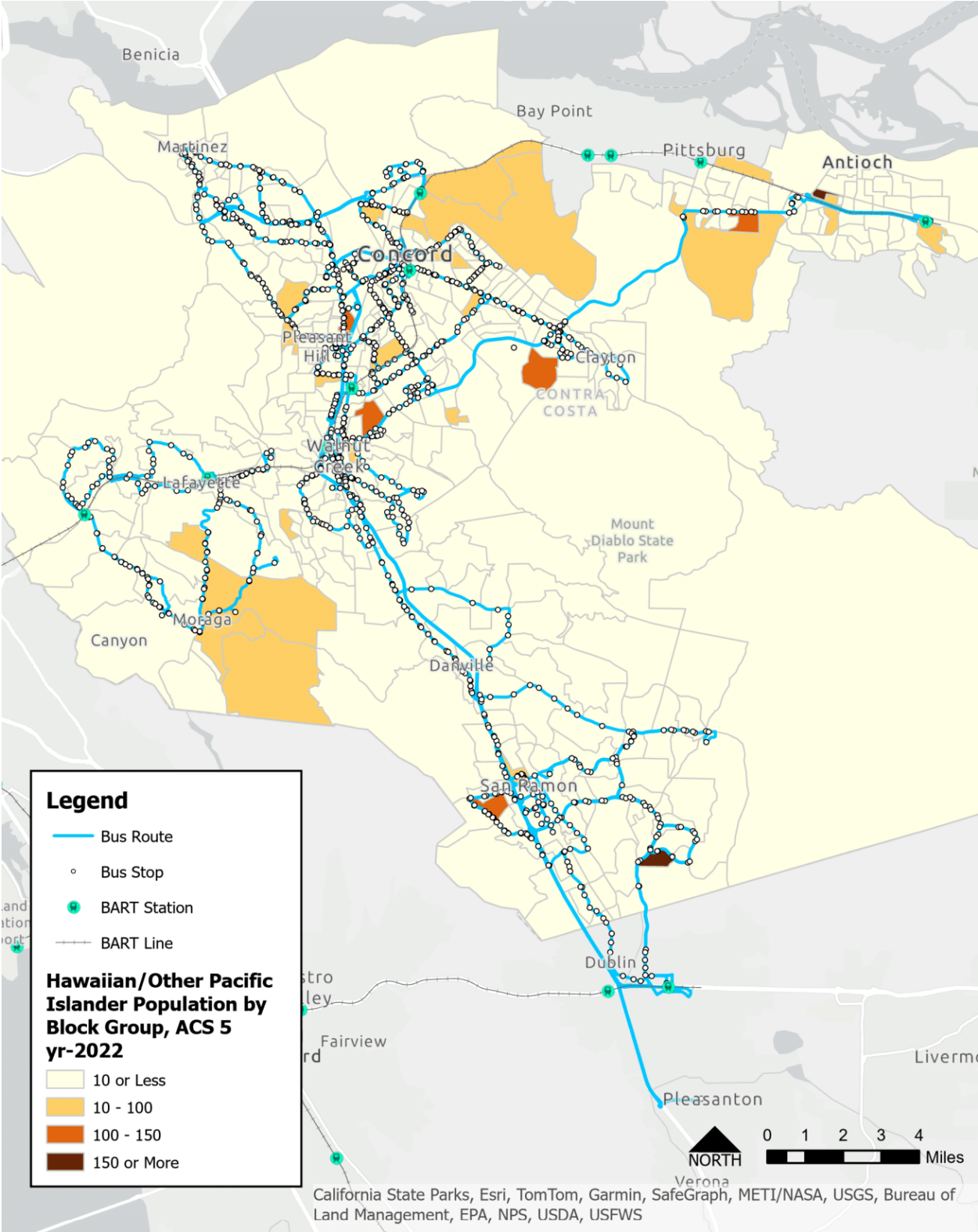
Asian Population by Census Block Group



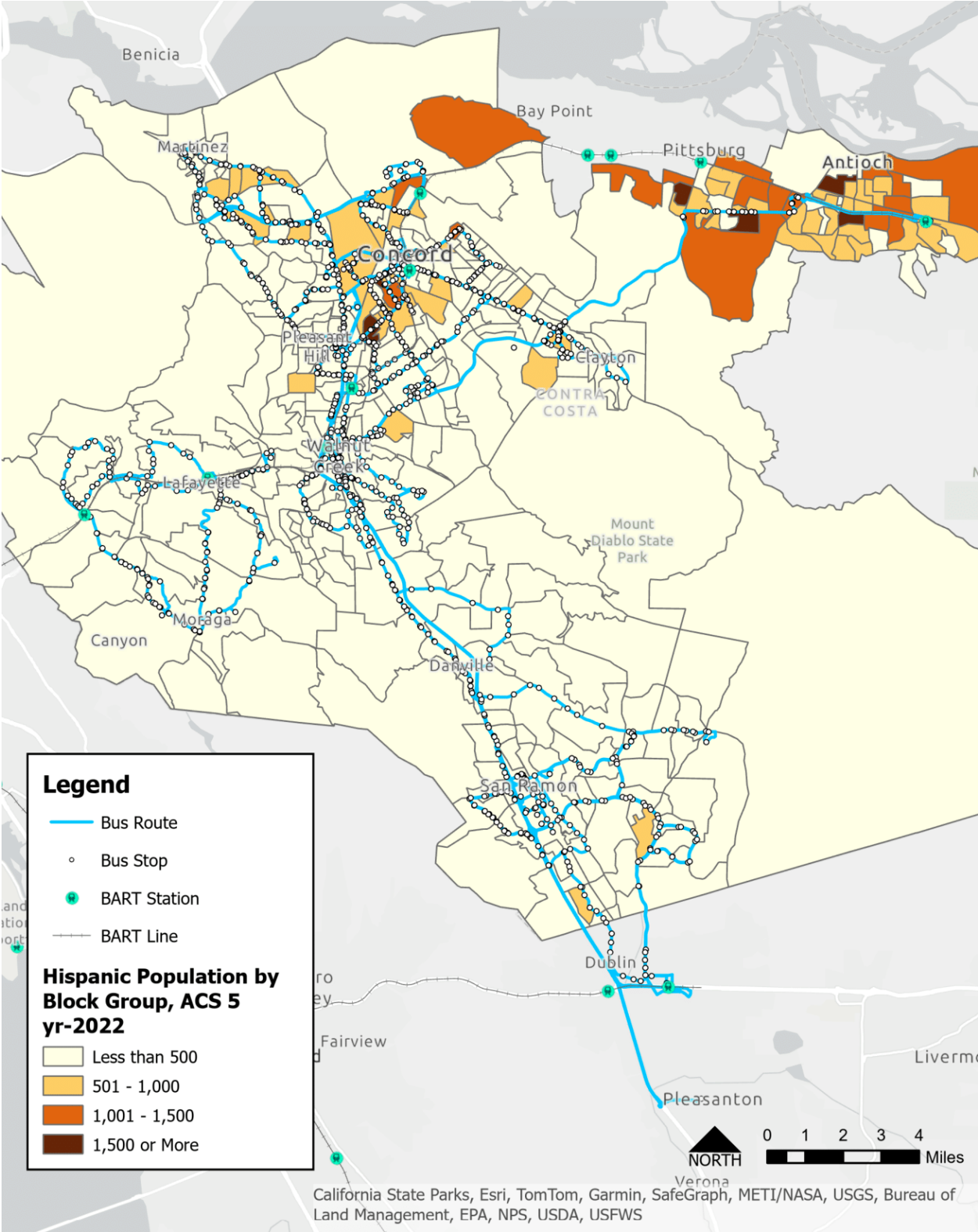
Black Population by Census Block Group



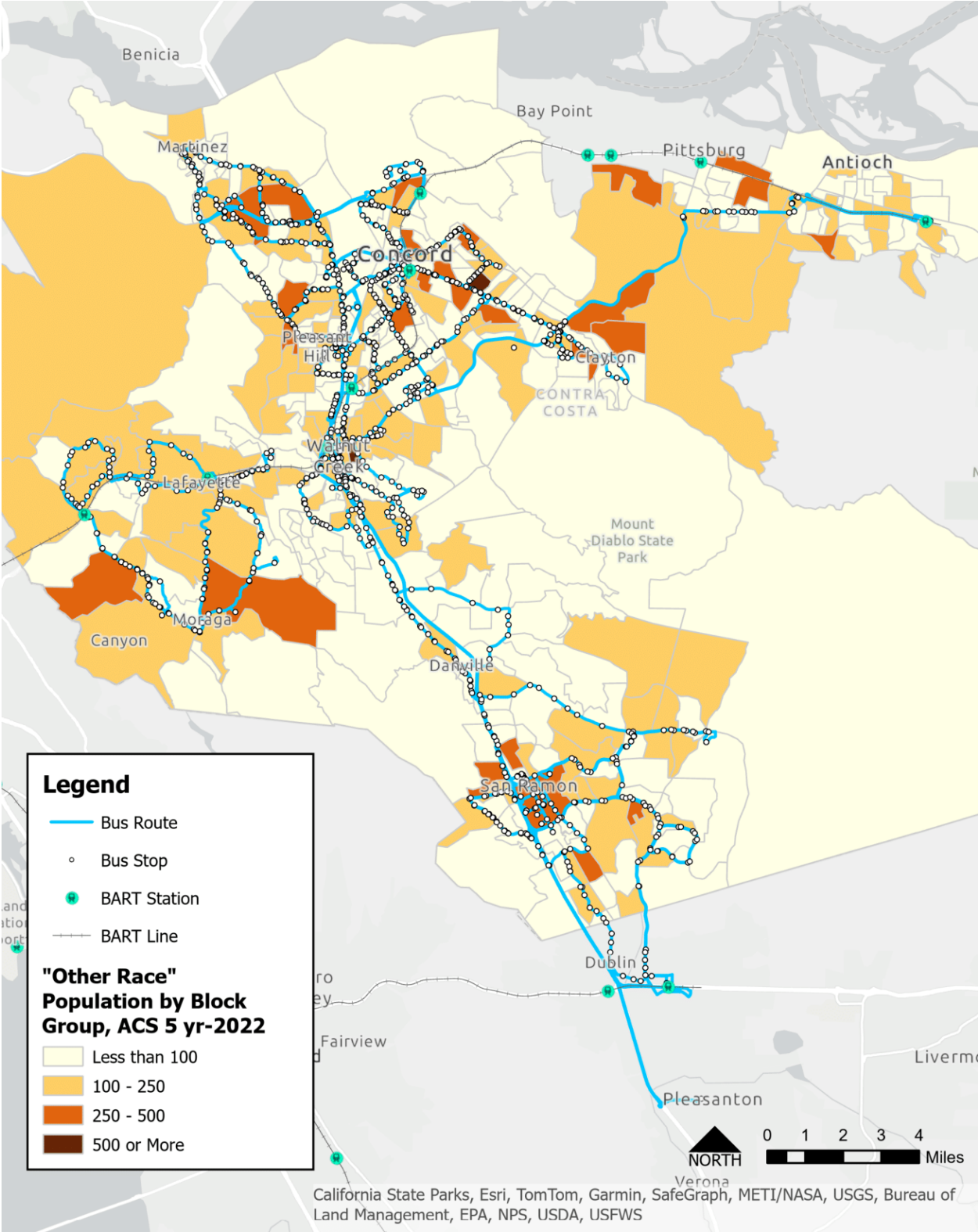
Hawaiian/Pacific Islander Population by Census Block Group



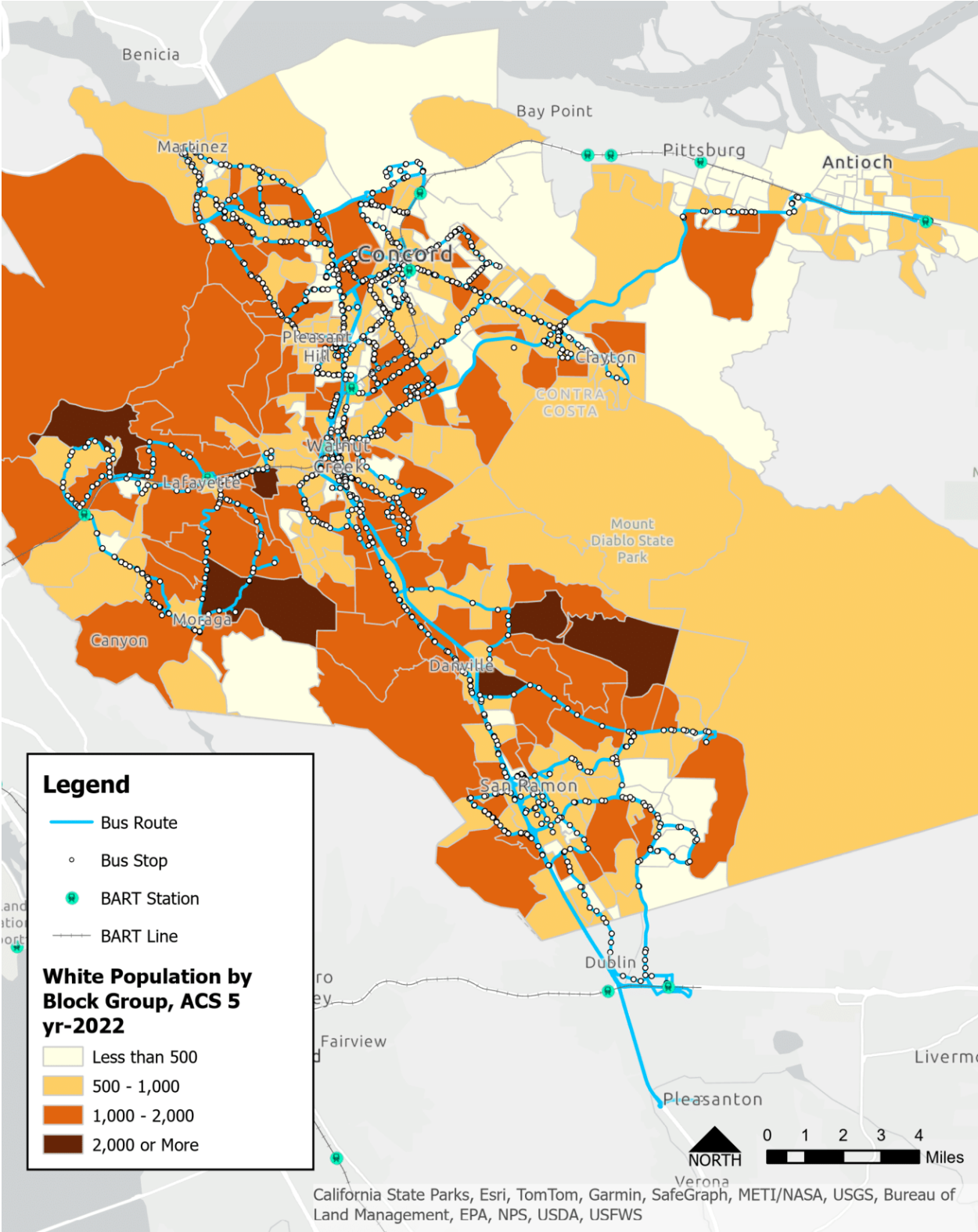
Hispanic Population by Census Block Group



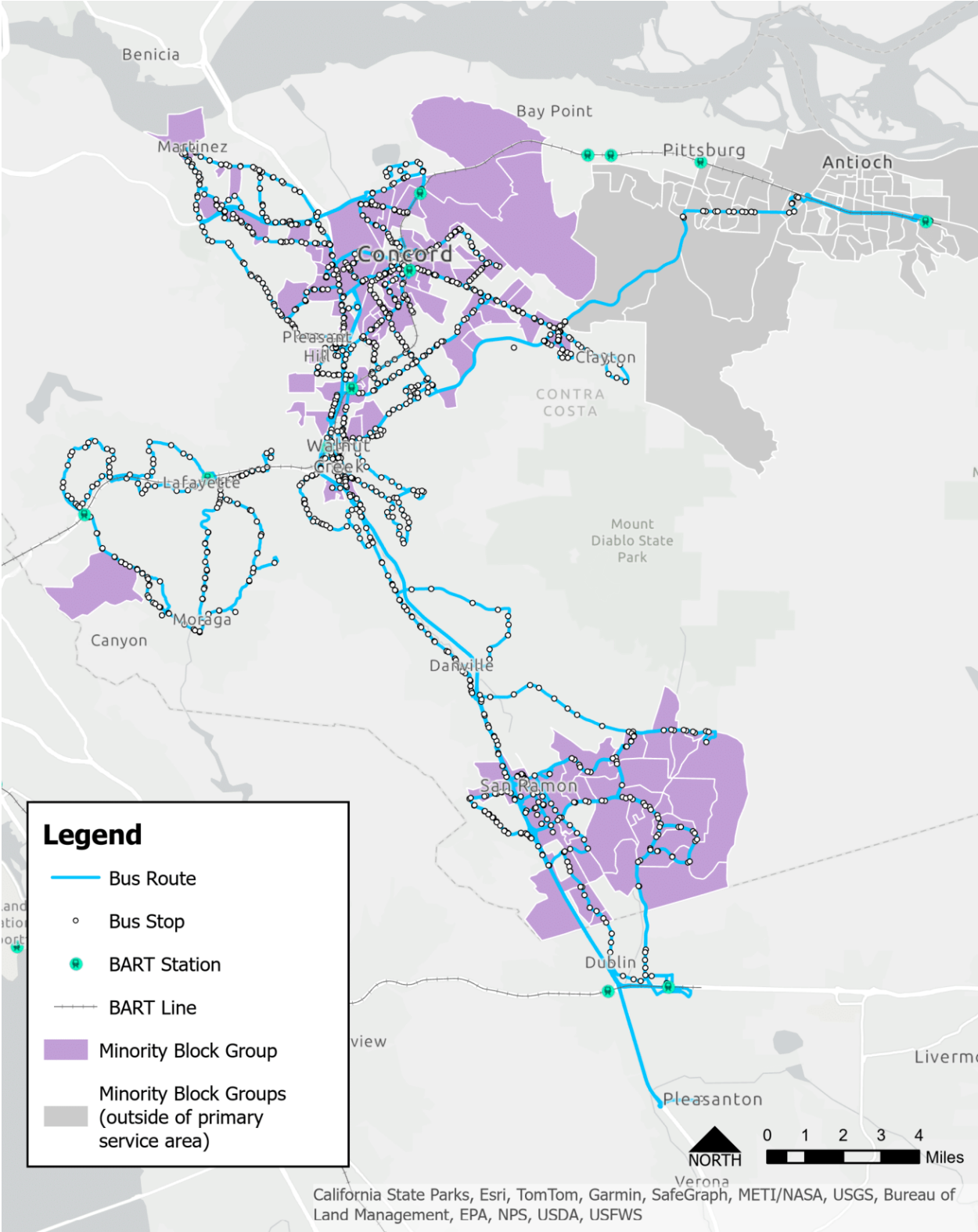
“Other Races” Population by Census Block Group



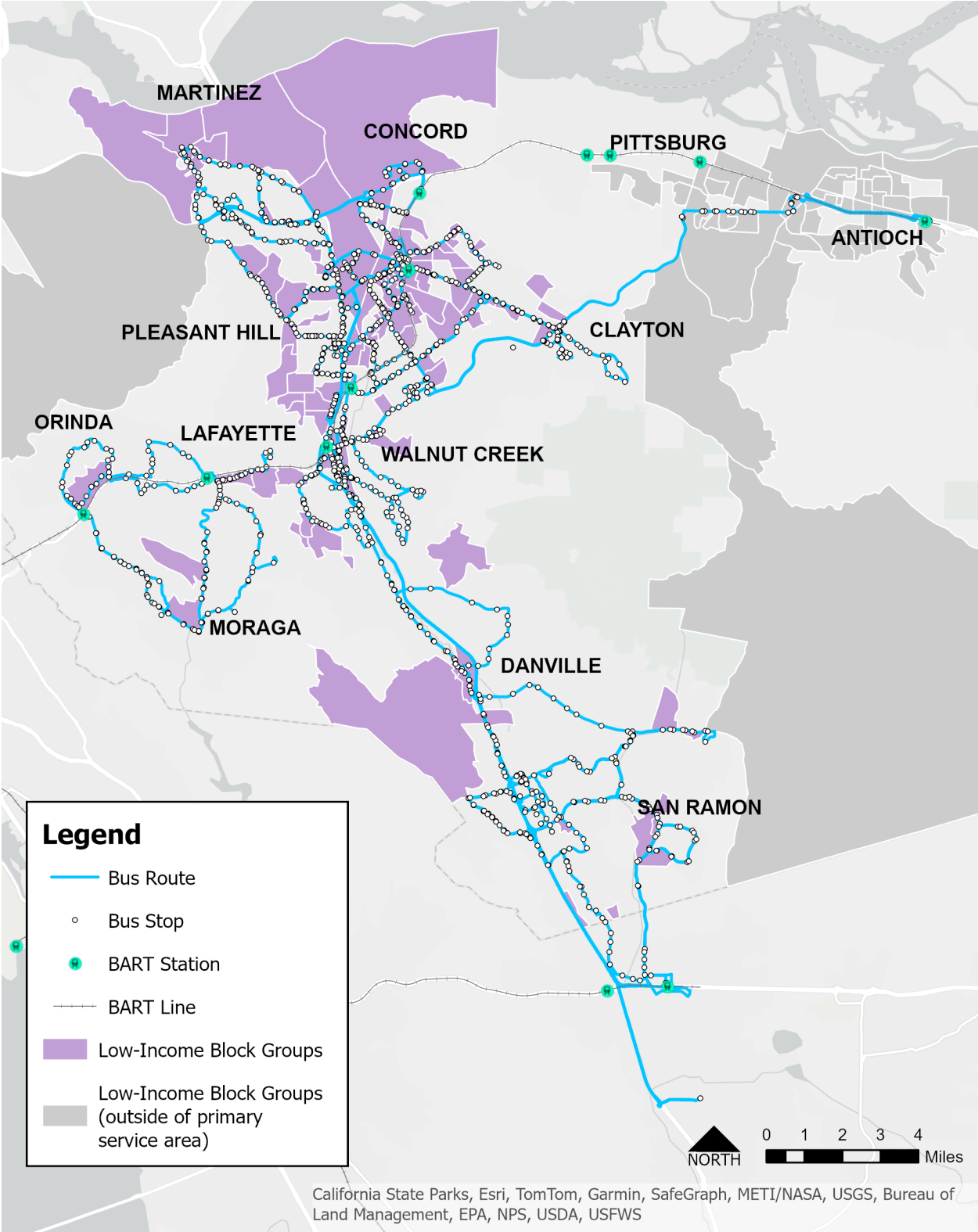
White Population by Census Block Group



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.

The board memo from the most recent survey conducted in October 2023 is attached. The survey was conducted using paper surveys distributed on-board vehicles and collected by surveyor staff. The survey was available in both English and Spanish in accordance with County Connection's Language Assistance Plan. The results were entered, cleaned, and compiled by the contractor, and the complete dataset was provided to County Connection to use at its discretion.

I. MONITORING PROGRAM RESULTS

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.

The results of the monitoring program will be reviewed by County Connection's Board of Directors. The Board resolution approving this Title VI Program Report, including the results of the monitoring program, will be included in Appendix E following Board adoption.

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 2018-2022 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, 50.2% of the overall population within County Connection's service area identifies as minority, and 10.8% 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 33 routes are minority routes and 30 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 62.8% are categorized as minority routes, and any routes with more than the system average of 33.2% of riders who are considered low-income are categorized as low-income routes. Based on this analysis, an additional 4 routes are designated as minority routes, and an additional 2 routes are low-income routes.

Based on a combination of these two methodologies, a total of 37 routes are designated as minority routes, and 32 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
Local Routes						
1	11.0%	33.3%		39.2%	33.3%	yes
4	26.4%	62.9%	yes	87.1%	15.2%	yes
5	14.5%	73.3%	yes	66.0%	0.0%	yes
6	3.0%	47.8%		19.2%	38.9%	yes
7	11.1%	57.9%		8.2%	0.0%	
9	48.4%	82.4%	yes	60.9%	14.3%	yes
10	43.5%	49.1%	yes	29.6%	55.3%	yes
11	38.7%	68.0%	yes	41.9%	31.8%	yes
14	49.3%	68.3%	yes	54.6%	41.4%	yes

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	37.9%	76.2%	yes	50.7%	20.0%	yes
16	32.4%	77.1%	yes	49.3%	24.1%	yes
17	71.6%	79.2%	yes	66.6%	33.3%	yes
18	42.3%	43.8%	yes	36.2%	30.8%	yes
19	54.1%	80.0%	yes	58.4%	30.0%	yes
20	89.9%	73.2%	yes	85.3%	55.6%	yes
21	17.9%	40.0%		24.8%	0.0%	
28	64.2%	66.7%	yes	46.4%	0.0%	yes
35	87.9%	66.7%	yes	14.2%	22.2%	
Express Routes						
91	85.1%	33.3%	yes	100.0%	40.0%	yes
92	30.1%	50.0%		14.1%	0.0%	
93	64.4%	36.4%	yes	39.1%	20.0%	yes
95	18.8%	0.0%		15.7%	0.0%	
96	20.2%	100.0%	yes	14.2%	14.3%	
97	78.1%	62.5%	yes	7.0%	12.5%	
98	43.2%	76.9%	yes	41.2%	20.0%	yes
99	34.5%	54.5%	yes	61.0%	33.3%	yes
Weekend Routes						
301	32.1%	0.0%		58.3%	0.0%	yes
310	40.6%	66.7%	yes	31.6%	0.0%	
311	33.6%	76.5%	yes	47.2%	10.0%	yes

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
314	82.0%	81.8%	yes	61.6%	61.1%	yes
315	60.7%	100.0%	yes	63.7%	100.0%	yes
316	42.7%	50.0%	yes	38.2%	50.0%	yes
320	93.8%	46.7%	yes	94.3%	0.0%	yes
321	21.6%	50.0%		28.1%	--(1)	
335	94.1%	75.0%	yes	20.4%	0.0%	
School Routes⁽²⁾						
601	0.0%	--		40.3%	--	yes
602	2.6%	--		20.0%	--	
605	40.1%	--	yes	66.8%	--	yes
606	2.1%	--		23.4%	--	
611	36.7%	--	yes	45.5%	--	yes
612	58.0%	--	yes	41.5%	--	yes
613	62.8%	--	yes	63.1%	--	yes
615	63.9%	--	yes	61.1%	--	yes
619	39.3%	--	yes	43.5%	--	yes
622	88.2%	--	yes	29.1%	--	
623	37.8%	--	yes	3.6%	--	
625	0.0%	--		13.8%	--	
626	0.0%	--		18.2%	--	
635	98.8%	--	yes	2.8%	--	
636	44.8%	--	yes	2.8%	--	

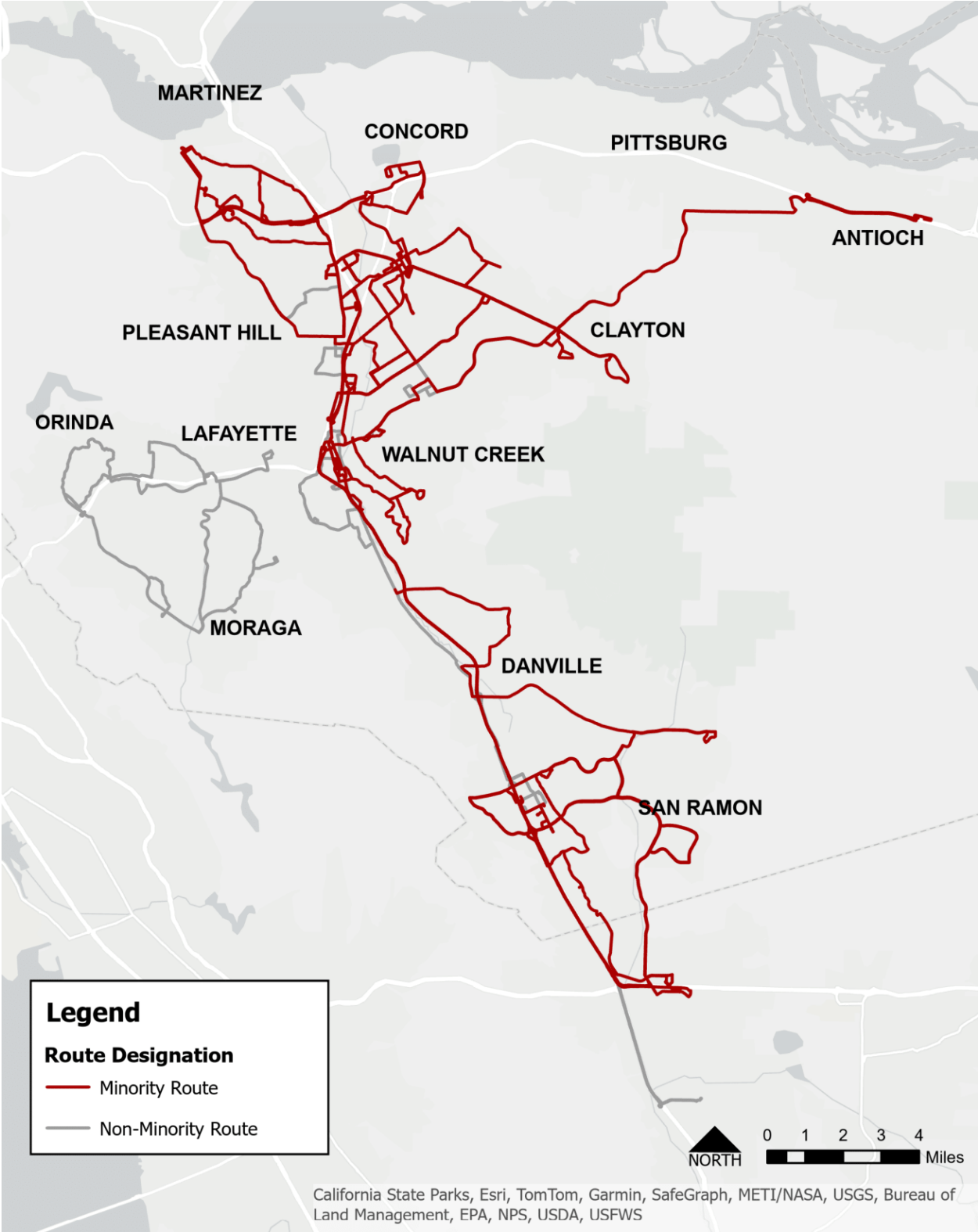
Source: U.S. Census Bureau, 2018-2022 American Community Survey; 2023 Onboard Survey

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

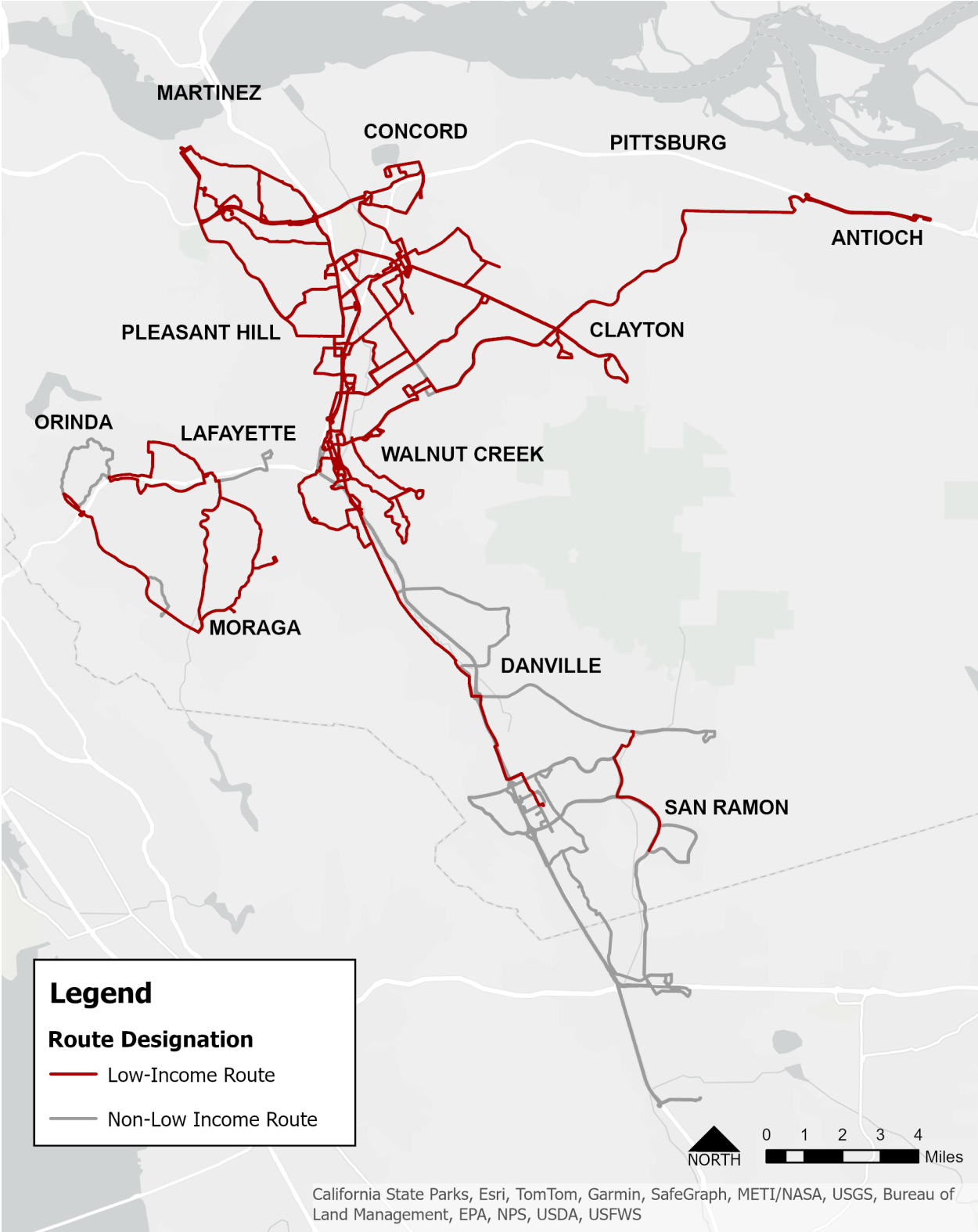
(1) No survey data available for Route 321

(2) Select Routes have limited survey data available and are categorized only by the block group analysis.

County Connection Routes Categorized by Minority/Non-Minority



County Connection Routes Categorized by Income Level



System-Wide Service Standards

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	Average Load
Standard	1.25
Actual	0.35
By Route Designation	
Minority Route	0.29
Non-Minority Route	0.48
Low Income Route	0.31
Non-Low Income Route	0.42

Source: Fall 2023 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 2024 (effective November 12, 2023), the maximum systemwide headway was on Route 19 with a frequency of 90 minutes, which is below the vehicle headway standard.

Route 19 is designated as a minority and low-income route. Among minority and low-income routes, the average headway was a frequency of 51 minutes and 53 minutes, respectively. Among non-minority and non-low-income routes, the average headway was a frequency of 51 minutes and 48 minutes respectively. The maximum headway for non-minority routes was Route 1 with a frequency of 60 minutes, while the maximum headway for non-low income routes was Route 21 with a frequency of 60 minutes.

Maximum Vehicle Headway

Vehicle Headway	
Standard	2:00
Actual	1:30
By Route Designation	
Minority Route	1:30
Non-Minority Route	1:00
Low Income Route	1:30
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	Weekend
Standard	87%	75%	80%	80%
Actual	79%	74%	65%	75%
By Route Designation				
Minority Route	78%	76%	63%	77%
Non-Minority Route	81%	68%	67%	68%
Low Income Route	79%	74%	63%	76%
Non-Low Income Route	79%	75%	66%	73%

Source: FY 2023 APC data

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

Service Availability	
Standard	70%
Service Area Population	655,586
Population within 3/4 Mile	513,579
% Population Served	78%
Minority Population	
Service Area Minority Population	328,836
Minority Population within 3/4 Mile	251,335
% Minority Population Served	76%
Low-Income Population	
Service Area Low-Income Population	70,849
Low-Income Population within 3/4 Mile	51,753
% Low-Income Population Served	73%

Source: U.S. Census Bureau, 2018-2022 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.

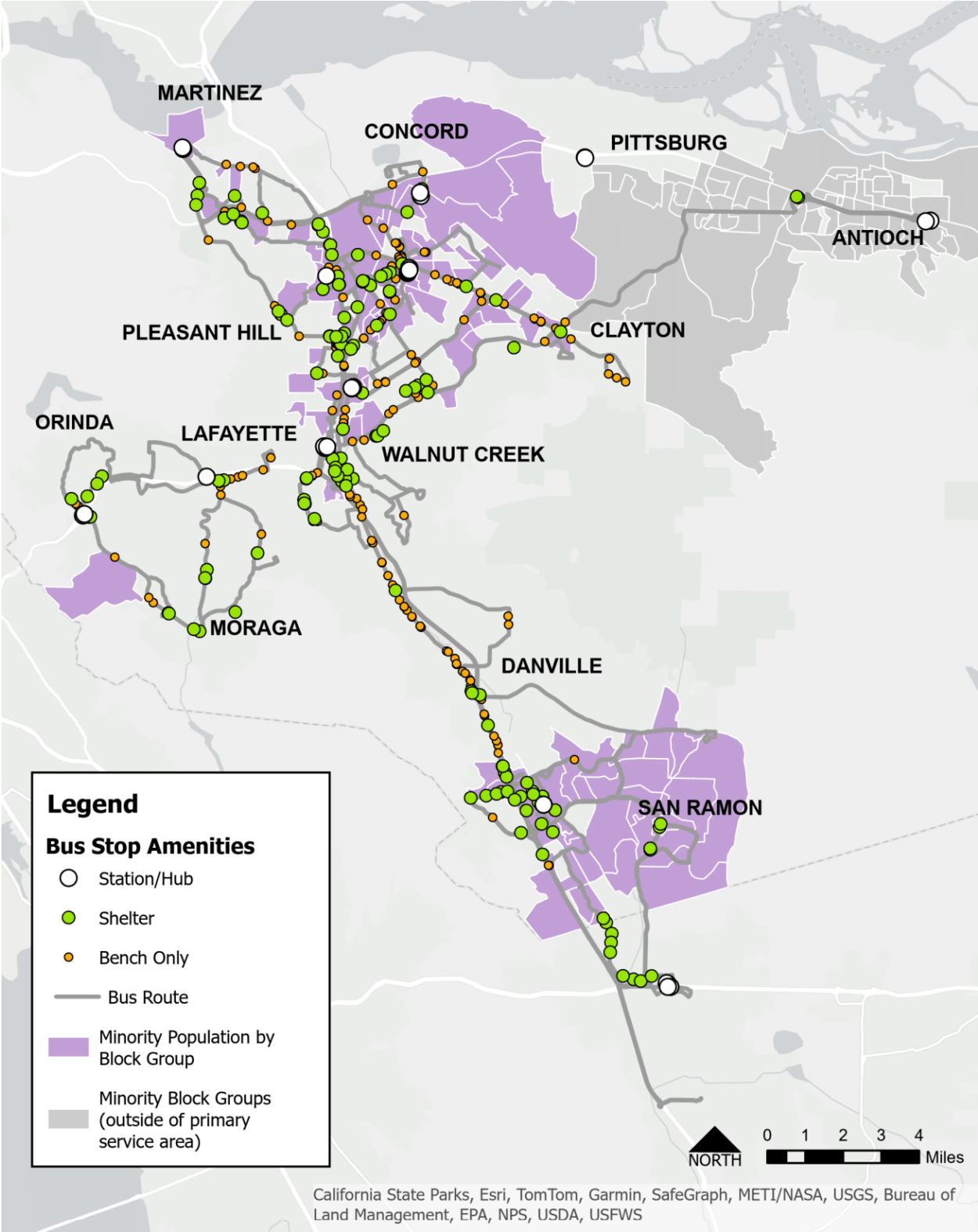
Standard:

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. Copies of the full equity analyses can be found on County Connection's website (<https://countyconnection.com/reports-and-publications/#titlevi>) and are linked below:

- [2022 Weekend Monument Free Expansion](#)
- [2023 Routes 99X and 27 Consolidation & Free Fare](#)
- [2023 Clipper Fare Changes](#)

Proof of the Board's consideration and approval of each equity analysis is attached.

RESOLUTION NO. 2023-023

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

* * *

APPROVING WEEKEND MONUMENT FREE FARE EXPANSION PROGRAM

WHEREAS, the County of Contra Costa and the Cities of Clayton, Concord, Lafayette, Martinez, Orinda, Pleasant Hill, San Ramon, and Walnut Creek, and the Towns of Danville and Moraga (hereinafter “member jurisdictions”), have formed the Central Contra Costa Transit Authority (CCCTA), a joint exercise of powers agency created under California Government Code Sections 6500, *et seq.*, to provide coordinated and integrated public transportation services within the area of such member jurisdictions;

WHEREAS, on February 21, 2019, the Board of Directors (Board) authorized the Weekend Monument Free Fare Program (Program) as a pilot program to fully subsidize fares on weekday Routes 11, 14, and 16 using funding from the state's Low Carbon Transit Operations Program (LCTOP);

WHEREAS, on July 1, 2019, CCCTA implemented the Program, resulting in a 54.6% increase in average daily ridership on Routes 11, 14, and 16 over the first six months of the Program as compared to the previous period for the prior year;

WHEREAS, on April 16, 2020, the Board approved continuation and expansion of the Program to include three weekend routes, Routes 311, 314 and 316, resulting in a 32% increase in ridership as compared to the previous fiscal year average;

WHEREAS, staff recommends continuation of the expanded Program, so long as funds are available through LCTOP or another source;

WHEREAS, Federal Transit Administration (FTA) Circular 4702.1B, which implements Title VI of the Civil Rights Act of 1964 (Title VI), requires CCCTA to conduct an equity analysis (Title VI Analysis) on fare changes to assess whether the changes have disproportionate burdens on low-income populations or disparate adverse impacts on minority populations;

WHEREAS, CCCTA staff began outreach to receive public comments on the proposed continuation of the expanded Program in November 2022, and conducted a public hearing on December 15, 2022;

WHEREAS, the Title VI Analysis found that none of the proposed fare changes have a disparate impact on minority populations or a disproportionate burden on low-income populations;

WHEREAS, the Marketing, Planning & Legislative Committee recommends that the Board approve the continuation of the expanded Program, so long as funds are available through LCTOP or another source, and approve the Title VI Analysis; and

WHEREAS, the Board has reviewed the Title VI Analysis, and has considered the public input received and the financial implications of the proposed fare changes.

NOW THEREFORE BE IT RESOLVED by the Central Contra Costa Transit Authority Board of Directors as follows:

1. The continuation of the expanded Program, so long as funds are available through LCTOP or another source, and the associated Title VI analysis, attached hereto as Exhibit A and incorporated by reference, are hereby approved.
2. The General Manager, or designee, is hereby authorized to take all actions necessary and proper to implement the expanded Program.
3. The General Manager, or designee, is hereby authorized to take all necessary steps to submit documentation relating to the Title VI Analysis to the FTA.

Regularly passed and adopted this 15th day of December 2022, by the following vote:

AYES: Directors Andersen, Haydon, Hoffmeister, Hudson, Noack, Schroder, Tatzin, Wilk and Worth

NOES: None

ABSTAIN: None

ABSENT: Directors McCluer and Storer



Amy Worth, Chair, Board of Directors

ATTEST:



Lathina Hill, Clerk to the Board

RESOLUTION NO. 2023-037

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

* * *

**APPROVING ROUTES 99X AND 27 FARE AND SERVICE CHANGES AND CORRESPONDING TITLE VI
EQUITY ANALYSIS**

WHEREAS, the County of Contra Costa and the Cities of Clayton, Concord, Lafayette, Martinez, Orinda, Pleasant Hill, San Ramon, and Walnut Creek, and the Towns of Danville and Moraga (hereinafter “member jurisdictions”), have formed the Central Contra Costa Transit Authority (CCCTA), a joint exercise of powers agency created under California Government Code Sections 6500, *et seq.*, to provide coordinated and integrated public transportation services within the area of such member jurisdictions;

WHEREAS, in August 2018, CCCTA launched Route 99X, an express route which runs from the Martinez Amtrak Station to North Concord BART during peak hours and serves the Pacheco Transit Center, Concord Adult Homeless Shelter, Contra Costa County offices at Glacier Drive and Muir Road, and the Contra Costa County Superior Courthouse in Martinez and is funded by the state's Low Carbon Transit Operations Program (LCTOP);

WHEREAS, Route 99X has not attracted much ridership since it was introduced in 2018, and even at its peak, its performance was below the overall average for all CCCTA express routes, and the route continues to underperform compared to other CCCTA express routes;

WHEREAS, to increase ridership, efficiency, and productivity, CCCTA staff propose service changes that will consolidate Route 27 with Route 99X and eliminate several segments from the routes;

WHEREAS, the new alignment and schedule of Route 99X will provide a faster and more direct connection between North Concord BART and Martinez Amtrak, continue serving high usage stops like North Concord BART, Concord Adult Homeless Shelter, Morello Avenue/Arnold Drive, Martinez Amtrak station, and Mason Circle, eliminate route segments with little to no ridership on both Routes 27 and 99X, including Pike Ln, the Pacheco Transit Center, Muir Rd, and Arnold Dr, and improve transfer connections and frequencies with Amtrak and BART;

WHEREAS, to address potential financial burdens with the consolidation of the routes, CCCTA staff also recommend eliminating all fares on the realigned Route 99X, which will be funded by LCTOP grant funds, and to also make paratransit fares free on complementary trips;

WHEREAS, Federal Transit Administration (FTA) Circular 4702.1B, which implements Title VI of the Civil Rights Act of 1964 (Title VI), requires CCCTA to conduct a service and fare equity analysis (Title VI Analysis) on the proposed service and fare changes to assess whether the changes have disproportionate burdens on low-income populations or disparate adverse impacts on minority populations;

WHEREAS, CCCTA staff began outreach to receive public comments on the proposed changes in April 2023, conducting onboard bus surveys, posting notices about the proposed changes on CCCTA’s social media accounts and website, and conducted a noticed public hearing on May 18, 2023;

WHEREAS, the Title VI Analysis found that none of the proposed service and fare changes have a disparate impact on minority populations or a disproportionate burden on low-income populations;

WHEREAS, the Board has reviewed the Routes 99X and 27 Consolidation and Free Fare Title VI Service and Fare Equity Analysis, has considered the public input received, and the financial implications of the proposed service and fare changes.

NOW THEREFORE BE IT RESOLVED by the Central Contra Costa Transit Authority Board of Directors as follows:

1. The Routes 99X and 27 Consolidation and Free Fare Title VI Service and Fare Equity Analysis, attached hereto as Exhibit A and incorporated by reference, is hereby approved.
2. The consolidation of Route 27 with Route 99X and realignment of Route 99X, as described with more particularity in the attached Exhibit A, are hereby approved.
3. Upon consolidation of Route 27 with Route 99X, all fares on Route 99X will be free and will be funded by LCTOP grant funding. Additionally, consistent with applicable federal requirements, paratransit fares will also be free on complementary trips.
4. The General Manager, or designee, is hereby authorized to take all actions necessary and proper to implement the actions listed above.
5. The General Manager, or designee, is hereby authorized to take all necessary steps to submit documentation relating to the Routes 99X and 27 Consolidation and Free Fare Title VI Service and Fare Equity Analysis to the Federal Transit Administration.

Regularly passed and adopted this 18th day of May 2023, by the following vote:

AYES: Directors Andersen, Diaz, Hoffmeister, Schroder, Sos, Storer, Tatzin, Wilk and Worth

NOES: None

ABSTAIN: None

ABSENT: Directors Hudson and Noack



Amy Worth, Chair, Board of Directors

ATTEST:



Lathina Hill, Clerk to the Board

RESOLUTION NO. 2024-07

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

* * *

**APPROVING CLIPPER FARE CHANGES AND CORRESPONDING TITLE VI EQUITY
ANALYSIS**

WHEREAS, the County of Contra Costa and the Cities of Clayton, Concord, Lafayette, Martinez, Orinda, Pleasant Hill, San Ramon, and Walnut Creek, and the Towns of Danville and Moraga (hereinafter "Member Jurisdictions"), have formed the Central Contra Costa Transit Authority ("CCCTA"), a joint exercise of powers agency created under California Government Code Sections 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 November 19, 2020, the Board of Directors ("Board") approved implementation of the Clipper START Program and Youth Fare Program pursuant to Resolution No. 2021-014, and the pilot programs were launched on January 25, 2021;

WHEREAS, on September 16, 2021, the Board approved an 18 month extension of the Clipper START Program and Youth Fare Program pursuant to Resolution 2022-007;

WHEREAS, on June 15, 2023, the Board approved a two year extension of the Clipper START Program and Youth Fare Program through June 30, 2025;

WHEREAS, the Clipper START Program and Youth Fare Program currently provide a 20% discount off the Clipper single-ride fare for eligible low-income adults and youth ages 6-18, respectively, when using a Youth Clipper card;

WHEREAS, the Metropolitan Transportation Commission ("MTC"), the regional transportation planning agency for the San Francisco Bay Area that administers the Clipper START Program, conducted an evaluation of the first two years of the pilot program and identified several strategies to improve the effectiveness of the program and increase participation, including incentivizing all operators to offer a 50% discount by increasing MTC's reimbursement amount;

WHEREAS, staff proposes increasing the discount from 20% to 50% for Clipper START and Youth Clipper fares for the duration of the pilot programs;

WHEREAS, CCCTA's current fare structure includes a \$0.25 Clipper surcharge for single rides and \$10 surcharge for a 31-day pass on Express routes, and staff proposes eliminating these surcharges so that the Express route fares are consistent with Local route fares;

WHEREAS, Federal Transit Administration ("FTA") Circular 4702.1B, which implements Title VI of the Civil Rights Act of 1964 ("Title VI"), requires CCCTA to conduct a service and fare equity analysis ("Title VI Analysis") on proposed service and fare changes to assess whether the changes have disproportionate burdens on low-income populations or disparate adverse impacts on minority populations;

WHEREAS, CCCTA staff began outreach to receive public comments on the proposed changes in July 2023 and conducted a noticed public hearing on September 28, 2023;

WHEREAS, the Title VI Analysis found that none of the proposed fare changes have a disparate impact on minority populations or a disproportionate burden on low-income populations; and

WHEREAS, the Board has reviewed the proposed fare changes and 2023 Clipper Fare Changes Title VI Fare Equity Analysis, considered the public input received, and considered the financial implications of the proposed fare changes.

NOW THEREFORE BE IT RESOLVED by the Central Contra Costa Transit Authority Board of Directors as follows:

1. The 2023 Clipper Fare Changes Title VI Fare Equity Analysis, attached hereto as Exhibit A and incorporated by reference, is hereby approved.
2. The 50% discount for Clipper single-ride fare for the Clipper START Program and Youth Fare Program, as described with more particularity in the attached Exhibit A, is hereby approved for the duration of the pilot programs.
3. Elimination of the \$0.25 Clipper surcharge for single rides and \$10 surcharge for a 31-day pass on Express routes, as described with more particularity in the attached Exhibit A, is hereby approved.
4. The General Manager, or designee, is hereby authorized to take all actions necessary and proper to implement the actions listed above.
5. The General Manager, or designee, is hereby authorized to take all necessary steps to submit documentation relating to the 2023 Clipper Fare Changes Title VI Fare Equity Analysis to the Federal Transit Administration.

Regularly passed and adopted this 28th day of September 2023, by the following vote:

AYES: Directors Andersen, Diaz, Hoffmeister, Hudson, Schroder, Storer, Sos, Tatzin, Wilk and Worth

NOES: None

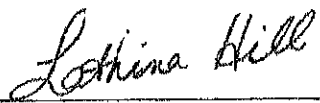
ABSENT: Director Noack

ABSTAIN: None



Don Tatzin, Chair, Board of Directors

ATTEST:



Lathina Hill, Clerk to the Board