

City of Riverside

Parks, Recreation and Community Services Department

Special Transportation Division

Title VI Program

Fiscal Years 2021 - 2024

Table of Contents

- I. Introduction
- II. Overview of Services
- III. Notice to the Public
- IV. Complaint Procedure and Complaint Form
- V. Limited English Plan (LEP)
- VI. Public Participation Plan
- VII. Racial Composition of Board(s)
- VIII. Facility Site Equity Analysis

IX. Subrecipients

- X. Appendices
 - a. Title VI Notice to the Public
 - b. Title VI Brochure
 - c. Title VI Complaint Procedures
 - d. Title VI Complaint Form
 - e. Investigations, Lawsuits and Complaints Document
 - f. Summary of Outreach Efforts
 - g. City Council Approval of Title VI Program

I. <u>Introduction</u>

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that "no person in the United States 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." (42 U.S.C. Section 2000d). The Civil Rights Restoration Act of 1987 clarified the intent of Title VI to include all programs and activities of Federal-aid recipients, sub-recipients, and contractors whether those programs and activities are federally funded or not. During the Obama Administration, the Federal Transit Administration ("FTA") placed renewed emphasis on Title VI issues, including providing meaningful access to persons with Limited English Proficiency ("LEP"). Recipients of public transportation funding from FTA are required to develop policies, programs, and practices that ensure federal transit dollars are used in a manner that is nondiscriminatory as required under Title VI. This document details how the City of Riverside incorporates nondiscrimination policies and practices in providing services to the public.

II. System Overview

Special Transportation, a Division within the City of Riverside Parks, Recreation and Community Services Department, has been offering paratransit services to the Riverside community since 1975. This dial-a-ride transportation service is provided within the 81.51 square mile incorporated city limits of the City of Riverside, shown below in Figure 1-1.

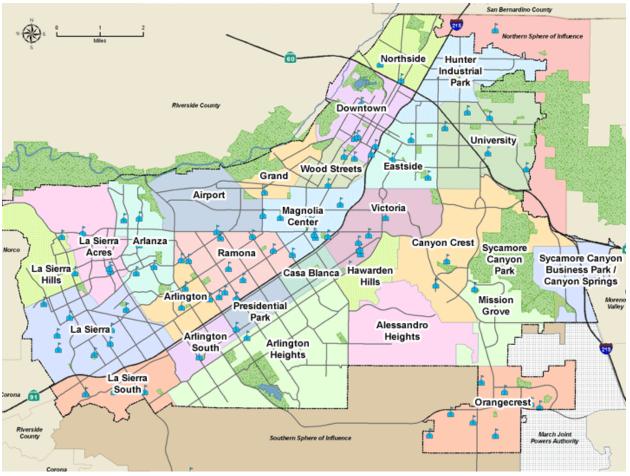


Figure 1

According to the 2019 demographic data published by the United States Census Bureau's American Community Survey (ACS), the population of the City of Riverside totals 326,414 residents. The senior population within the City of Riverside (those 60 years of age and older) accounts for approximately 15% of the City population. Staff anticipates an increase in the senior population and in ridership due to the age demographics of the City and the aging baby boomer generation, the largest generation in United States history.

Owned and operated by the City of Riverside, Special Transportation is an origin-todestination rideshare service. The program is limited to senior citizens (60 years and older) and persons with disabilities (disabilities require a physician documentation).

Operating hours for Special Transportation are Monday through Friday, from 8:00 a.m. to 5:30 p.m. and 9:00 a.m. to 4:00 p.m. during weekends, and holidays. To reserve a ride, passengers

must call Special Transportation's reservation telephone number, during the business hours of 8:00 a.m. to 5:00 p.m., Monday through Friday, and 9:00 a.m.to 3:00 p.m. on weekends and holidays. An answering machine is available before and after business hours for cancellations.

III. <u>Notice to the Public</u>

Title 49 CFR Section 21.9(d) requires recipients to provide information to the public regarding the recipient's obligations under DOT's Title VI regulations and apprise members of the public of the protections against discrimination afforded to them by Title VI. At a minimum, the City shall disseminate this information to the public by:

- posting a Title VI notice on the City website
- posting a Title VI notice in public areas of the agency's office(s), including the reception desk, meeting rooms
- posting a Title VI notice in federally-funded vehicles

The City of Riverside Special Transportation notifies patrons, caretakers and the general public of its commitment to Title VI by placing stickers in both English and Spanish (*Appendix A*) in each minibus which state the City's commitment to prohibiting discrimination on the basis of race, color, or national origin in programs and activities receiving federal funds. The Notice includes a contact number for more information and This Notice is also posted on the City's website at <u>https://riversideca.gov/generalservices/commission-disabilities/title-vi</u>, and in the Title VI Brochure entitled "*City of Riverside and You*" (*Appendix B*). Brochures are located in the reception area of the Special Transportation Administration Offices.

IV. <u>Complaint Procedures and Complaint Form</u>

If a customer, patron or participant believes they have been discriminated against because of race, color, or national origin they may file a written complaint with the City's Title VI Coordinator. The Title VI Complaint Procedures (*Appendix C*) and the Complaint Form (*Attachment D*) can be obtained in 3 ways:

- 1. Website: https://riversideca.gov/generalservices/commission-disabilities/title-vi
- 2. **Phone:** General Services Department at 951-826-5247 or

Special Transportation Program at 951-687-8080.

3. Brochure: "City of Riverside and You"

Complaint forms are readily available in both English and Spanish and can be made available in other languages or in Braille upon request.

The City of Riverside strives to ensure access to and use of all City programs, services or benefits administered, without regard to religion, national origin, language, immigration status, sex, sexual orientation, gender identity, gender expression, disability status, economic status and cultural background. As such, the Human Relations Commission (HRC) was created in 1986 and meets in various parts of the city, the third Thursday of each month. Fifteen members advise the Mayor and City Council on issues of discrimination as well as promote diversity and equal opportunity in the City of Riverside. Commission members include representation from the following fields: education, medicine, health and welfare, law, real estate, industry, business, finance, law enforcement and labor.

The HRC was created to ensure that all community members of the City of Riverside receive or participate in:

- 1. Equal justice before the law.
- 2. Equal socio-economic and political opportunities.
- 3. Protection of dignity and integrity of every individual.
- 4. Responsible citizenship.
- 5. Responsive redress of grievances.
- 6. Equitable opportunities in health, housing, education and employment.
- 7. Respect and support of the law.
- 8. Education related to basic human rights and responsibilities.
- 9. Reduction and eventual elimination of prejudice among people based on race, religion, national origin, sex, age, disability, or sexual orientation.

Email: <u>hrc@riversideca.gov</u>

Website: www.riversideca.gov/hrc

V. <u>Limited English Plan (LEP)</u>

Riverside's Special Transportation staff utilized the required Four Factor Analysis to ensure meaningful access and language assistance to our service for Limited English-speaking persons.

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

Special Transportation used U. S. Census Bureau data and customer satisfaction surveys to identify LEP populations within the City of Riverside. According to the 2019 American Community Survey (ACS) data, the City of Riverside's population is 331,369 with 50,174 persons 60 years of age and older, equating to a senior population of approximately 15.1%. Upon further study, the ACS states that out of the 87,189 households in Riverside, 42,140 households are limited-English speaking. The majority of limited-English speaking households by far are households that are Spanish-speaking (40.8%), followed by Asian and Pacific Islander languages (6.2%), Other Indo-European languages (3.4%) and other languages (1.3%). Taking the data into consideration it was found that the largest portion of limited speaking persons in the City of Riverside are those who identified Spanish as their primary language.

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

In February 2021, Special Transportation conducted its most recent Annual Customer Satisfaction Survey. Due to the impact of COVID-19 Questions and answer selections were designed to assist in determining levels of customer satisfaction, mobility needs, and demographics. Already aware that there is a large population of Spanish speaking residents in the City of Riverside, the survey and accompanying letter were available in both English and Spanish. The survey was mailed to everyone who has utilized Special Transportation's services within the past year. It was available online as well as on-board the buses and in the lobby of the Special Transportation administrative office.

Based on the data gathered from the 248 residents who completed the 2020 survey, we were able to gather pertinent data about our riders. The results showed that 5% of Special Transportation's ridership chose Spanish as their preferred language while the remaining 95% selected English. Regarding the ethnicity of Special Transportation's riders, the survey results showed the following:

- 55% White/Caucasian
- 23% Latino/Hispanic,
- 17% African American
- 4% Asian or Pacific Islander

The objective is to get a wider distribution and provide more opportunities to gain feedback and gather additional pertinent information about our patrons that will enable us to serve them better in the future.

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

Special Transportation is an essential service available to the senior and disabled residents of Riverside. With its affordable fare and 7-day per week service that operates 362 days per year, our riders can travel anywhere within the City limits during our operating hours. We provide rides to the doctor, employment, vocational training workshops, senior centers the grocery store, movies, the pharmacy, the mall, etc.

Factor 4: Resources available to the recipient for LEP outreach.

Based on the most current census data available, Special Transportation's largest LEP population is Spanish-speaking residents. As such, the staff is equipped to accommodate Spanish-speaking patrons and/or caregivers by having publicity and information about our service translated and printed in Spanish, such as the Annual Customer Satisfaction Survey, the Title VI civil rights notices, and by employing bilingual staff as dispatcher/scheduler, drivers, and administrators. Furthermore, Special Transportation provides the following services:

Oral:

- Bilingual/Spanish
 - o Community meetings
 - o Public hearings
- Bilingual/Spanish staff
 - o 44% of administrative staff including dispatching

o 24% of the drivers

Written – Spanish translation:

- Brochures
- Surveys
- Website
- Community meeting and public hearing notice

VI. <u>Public Participation Plan</u>

The Public Participation Plan ("PPP") is a guide for ongoing public participation endeavors. Its purpose is to ensure that the City of Riverside utilizes effective means of providing information and receiving public input on transportation decisions from low income, minority and limited English proficient ("LEP") populations, as required by Title VI of the Civil Rights Act of 1964 and its implementing regulations.

Under federal regulations, transit operators must take reasonable steps to ensure that LEP persons have meaningful access to their programs and activities. This means that public participation opportunities, normally provided in English, should be accessible to persons who have a limited ability to speak, read, write, or understand English.

In addition to language access measures, other major components of the PPP include: public participation design factors; a range of public participation methods to provide information, to invite participation and/or to seek input; examples to demonstrate how population-appropriate outreach methods can be and were identified and utilized; and performance measures and objectives to ensure accountability and a means for improving over time.

The City of Riverside established a public participation plan or process that will determine how, when, and how often specific public participation activities should take place, and which specific measures are most appropriate.

The City of Riverside will make these determinations based on a demographic analysis of the population(s) affected, the type of plan, program, and/or service under consideration, and the resources available. Efforts to involve minority and LEP populations in public participation

activities may include both comprehensive measures, such as placing public notices at all transit stations, stops, and vehicles, as well as targeted measures to address linguistic, institutional, cultural, economic, historical, or other barriers that may prevent minority and LEP persons from effectively participating in our decision-making process.

Public outreach serves many purposes and is multi-layered. Special Transportation uses public outreach to apprise riders of temporary service changes, special events, Title VI protections, and to solicit and inform riders' how, where and when they can participate in Special Transportation's decision-making process including fare and service changes. Public outreach methods range from on-board notices and rider alerts to community meetings and public hearings. Outreach efforts include the dissemination of information about Special Transportation's services through promotional/informational material distributed throughout the community, and online as well as through partnerships with local and regional agencies who, in turn, inform their constituents about Special Transportation's services.

To ensure inclusive public participation among minority, low-income and senior persons, Special Transportation will utilize the following strategies:

- Locate meetings at transit accessible and ADA compliant venues
- Partner with local and regional agencies which primarily serve minority, low-income and senior persons to disseminate information:
 - Riverside County agencies
 - Inland Regional Center
 - Riverside County Department of Public Social Services
 - Riverside County Department of Mental Health
 - Riverside County Transportation Commission
 - Riverside County Library/Woodcrest Branch
 - Riverside Transit Agency Transportation NOW Committee
 - Educational Institutions (i.e. school districts, high schools, library)
 - Community organizations (i.e. senior centers)
- Utilize newspaper ads that serve LEP populations with circulation in the area associated with Special Transportation's service area
- Consider information dissemination through various communication methods including:

- Online Transportation website providing service description, schedule, fare and Title VI information
- Use of Riverside TV, City Activity Guide, and Riverside Public Utilities Bill insert for local news, information, events and community alerts
- o Surveys
- o Participation in various community events such as senior center health fairs
- Use of social media

A list of Special Transportation's public outreach efforts during this reporting period can be found in *Appendix F*.

VII. <u>Planning and Advisory Boards</u>

Not applicable as there are no transit-related, non-elected planning boards, advisory councils or committees.

VIII. <u>Facility Site Equity Analysis</u>

The City of Riverside Special Transportation Program has not constructed any new facilities nor has begun the planning process for any new facilities in the past 3 years or since the last Title VI program submittal in April 2017.

IX. <u>Subrecipients</u>

There were no subrecipients for this reporting period that received federal financial assistance from the FTA through the City of Riverside Special Transportation Division.