

2017

Glenn Transit Service: Title VI Program



Regional Transit Committee
10/19/2017

THIS PAGE IS INTENTIONALLY LEFT BLANK

CONTENTS

Title VI Program Monitoring.....	4
Civil Rights Assurance	4
Incorporation of Corrective Actions	4
Monitoring Procedures	4
Public Information Requirements	4
Limited English proficiency (LEP) Plan.....	6
Glenn Transit Service Factor Analysis	6
Factor 1: Review of LEP Populations.....	6
Factor 2: Assessing Frequency of contact with LEP persons.....	7
Factor 3: Assessing the importance of GTS' services	8
Factor 4: Determining available resources	8
Language Assistance Plan	9
Equity Analysis	11
Description Of Subrecipient Monitoring And Schedule Of Subrecipient Title VI Program Submissions	12
Table Depicting Membership Of Non-Elected Committees And Councils.....	13
Public Participation Plan	14
Opportunities for Public Comment	14
Engaging Title VI Protected Groups.....	14
Public Outreach	15
Staff Accessibility.....	15
Planning Documents.....	15
Discrimination Complaint Procedure	17
List Of Transit-Related Title VI Investigations, Complaints And Lawsuits.....	19
Service Standards And Policies.....	20
Vehicle Load.....	20
Vehicle Assignment.....	21
Vehicle Headway.....	21
On-time Performance.....	21
Distribution of Transit Amenities	21
Service Availability.....	22
Appendix A: Title VI Public Notice.....	24
Appendix B: Title VI Complaint Form (English/Spanish).....	25
Appendix C: Proceso de quejas por Titulo VI.....	29

THIS PAGE IS INTENTIONALLY LEFT BLANK

GLENN TRANSIT SERVICE

TITLE VI PROGRAM

Glenn Transit Service (GTS) is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services on the basis of race, color or national origin, as protected by Title VI of the Civil Rights Act of 1964. If you believe you have been subjected to discrimination under Title VI, you may file a written complaint with the Executive Director, Glenn Transit Service, 777 N. Colusa St., Willows, CA 95988; or by e-mail to transit@countyofglenn.net.

TITLE VI PROGRAM MONITORING

The requirement to establish internal monitoring processes and methodologies is applicable to all recipients of Federal assistance. GTS must monitor its service and review once per year, or when major service changes are proposed, using the procedures outlined in this section.

CIVIL RIGHTS ASSURANCE

The Assurances that are signed by GTS's Executive Director and attested by GTS's attorney assure that the level and quality of transit service and related benefits are provided in a manner consistent with Title VI. Program monitoring is conducted to ensure that GTS complies with this assurance.

INCORPORATION OF CORRECTIVE ACTIONS

If previous Title VI deficiencies have been found by GTS or through an audit review, the corrective action to remedy these deficiencies must be incorporated into GTS's Short Range Transit Plan or other improvement plans to assure compliance with Title VI.

MONITORING PROCEDURES

GTS must implement complaint procedures to monitor the level and quality of transit service provided to the minority community against overall system averages to determine compliance with Title VI.

PUBLIC INFORMATION REQUIREMENTS

GTS will disseminate Title VI Program Information to GTS staff, contractors, subcontractors, and beneficiaries as well as the general public. Public dissemination will include the posting of public statements at the locations listed in Table 1, inclusion of Title VI language in contracts, and annually publishing the Title VI Policy Statement in a newspaper having general circulation in the vicinity of proposed projects.

- a. GTS Title VI Policy and any other related information will be available to the public upon request.
- b. More detailed information regarding complaint procedures and Title VI civil rights will be included in brochures and other materials distributed to the public by GTS.
- c. Where there is a significant number or portion of the population eligible to be served by GTS which requires service information in a language other than English to participate in federally funded programs, GTS shall take every reasonable step to provide information in appropriate languages.

Posting Locations for Title VI Notices

Location Name	Address	City
Glenn Transit Service Office	777 N. Colusa St.	Willows
Paratransit Services	258 N. Butte St.	Willows
Orland City Hall	815 Fourth Street	Orland
Revenue Service Vehicles		
Riders Guide		
GTS Website	countyofglenn.net/transportation	

Table 1

LIMITED ENGLISH PROFICIENCY (LEP) PLAN

Title VI of the Civil Rights Act of 1964 prohibits recipients of federal financial assistance from discriminating against or otherwise excluding individuals on the basis of race, color, or national origin in any of their activities. It has been recognized that one form of discrimination may occur through an inability to communicate due to a limited proficiency in the English language. Title VI of the Civil Rights Act of 1964, Executive Order 13166, and various directives from the US Department of Justice (DOJ) and the US Department of Transportation (DOT) require federal aid recipients to take reasonable steps to ensure meaningful access to programs, services, and activities by those who do not speak English proficiently.

To determine the extent to which LEP services are required and in which languages, the law requires the analysis of four factors:

1. The number or portion of LEP persons eligible to be served or likely to be encountered by GTS programs, services, or activities.
2. The frequency with which LEP individuals come into contact with these programs, services or activities.
3. The nature and importance of the program, service, or activity to people's lives.
4. The resources available and the overall cost.

The primary goal of GTS's LEP Access Plan is to ensure that GTS recognizes the needs of members of the community who can be classified as LEP and implements a plan to communicate effectively ensuring reasonable access to our processes, information, and decision making.

GLENN TRANSIT SERVICE FACTOR ANALYSIS

To determine the extent to which LEP services are required and in which languages, the law requires the analysis of four factors as they pertain to the services provided. The following sections address each of these with respect to the GTS planning area.

FACTOR 1: REVIEW OF LEP POPULATIONS

Understanding the language needs of the community requires identification of the number of individuals considered LEP eligible to be served, likely to be served or likely to be encountered by GTS through its programs, services, or activities. To determine the potential LEP needs in the GTS planning area (Glenn County), staff reviewed the latest data available through the United States Census Bureau, American Community Survey 5-Year Estimates for the period of 2008-2012 for the total population 5 years of age and over.

Data collected for Glenn County shows that 9.4% of the total population 5 years and older speak English "not well" or "not at all". Of this same population segment 8.6% speak Spanish; 0.1% speak an Indo-European language; 0.5% speak an Asian or Pacific Island language; and 0.08% speak another language (see Table 2).

Limited English Proficiency Population in Glenn County

Population 5 years and older	No. of LEP Persons	% of LEP Persons	% of LEP Persons who speak Spanish	% of LEP who speak Indo-Euro Languages	% of LEP Person who speak Pacific Island Languages	% of LEP Persons who speak Other Languages
25,974	2,525	9.7%	9.1%	.08%	.5%	.04%

Table 2: Source: US Census Bureau, 2011-2015 American Community Survey

This demographic information represents all of Glenn County; however, GTS services are concentrated in the central and northeastern areas of the county. Despite the large geographic area represented by the 5-year estimate from the American Community Services, GTS recognizes that most of the general population resides in the areas of the county that it services. Consequently, these areas are likely where LEP persons reside.

The United States Department of Transportation (DOT) has adopted Department of Justice’s Safe Harbor Provision, which outlines circumstances that can provide a “safe harbor” for recipients regarding translation of written materials for LEP populations. “The ‘Safe Harbor Provision’, as defined by Department of Justice, 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 encountered, then such action will be considered strong evidence of compliance with the recipient’s written translation obligations.”

After analysis of the census data for Glenn County and using the ‘Safe Harbor Provision’ as a guide, GTS determined that Spanish is the only language group that exceeds the stated criteria for printed materials.

FACTOR 2: ASSESSING FREQUENCY OF CONTACT WITH LEP PERSONS

GTS utilizes the services of a contract operator, Paratransit Services, to manage and provide transit services to Glenn County. GTS made inquiries with Paratransit Services as to the frequency of contact their personnel have with individuals who can be considered LEP. Paratransit Services indicated that they encounter individuals that require language assistance “somewhat frequently”. The Spanish language is the most common language spoken these individuals. Spanish speaking staff and materials printed in Spanish are used by Paratransit Services to assist individuals requiring language assistance. Further, all Paratransit Services staff is given initial training as new hires on how to assist individuals requiring language assistance. This training is then reviewed and refined periodically to assist staff in dealing with changing conditions.

In the past three and one half years, GTS has been engaged in the update of its Short Range Transit Plan (SRTP). This effort involved the development of rider surveys regarding all aspects of the transit services and the conclusions of the final SRTP. LSC Transportation Consultants, LLC developed and purveyed these rider surveys in both English and Spanish. For the onboard passenger survey, only one out of the 86 surveys taken was requested in Spanish. This would seem to indicate that, in general, most users of the transit services read and understand English at a level sufficient to adequately access the services available.

GTS has had a long standing practice to provide printed materials such as schedules and rider's guides in Spanish. Spanish language schedules and printed materials are consumed at far lower rates than English language materials. Marketing products are likewise printed or produced in Spanish. Each year during a required annual review known as the "Unmet Transit Needs" process, the Social Services Transportation Advisory Council and Glenn County Transportation Commission staff produces outreach materials in English and Spanish to receive input on public needs related to the transit services provided by GTS.

FACTOR 3: ASSESSING THE IMPORTANCE OF GTS' SERVICES

All services provided by GTS have come into existence through the required annual review of transit needs in the region known as the "Unmet Transit Needs" process. This involves outreach meetings to the communities with the boundaries of a designated Regional Transportation Planning Agency (RTPA) to determine if there are transportation needs that "reasonable to meet". These needs are made up of two components: 1) a trip destination that provides a necessity of life or 2) A physical or financial obstacle between the individual and the necessary destination which the individual is unable to overcome. Necessary trips are those made to obtain or maintain employment, obtain non-emergency medical care/dental care, shopping for the necessities of life, obtain social services such as health care or welfare programs, and obtain education or job skills training. All transit services were designed and implemented on these guidelines. Consequently, all GTS transit operations and activities are considered essential transportation services for the residents of Glenn County.

FACTOR 4: DETERMINING AVAILABLE RESOURCES

Although GTS provides an intercity service into neighboring Butte County in the Chico area, it considers Glenn County to be its service area. GTS financial resources are limited as a small rural transit service; therefore, services have been concentrated within Glenn County to assist its citizenry. Likewise, distribution of printed materials and other outreach efforts have been limited to Glenn County as that is the population the transit services are intended to serve.

94% of those persons identified as LEP speak Spanish. Rider and contractor surveys did not note any other language needs.

GTS employs staff who can provide verbal and written translation of essential documents into Spanish. In addition, GTS has explored the possibility of leveraging contractors for translation services and has used other local social service provider's staff to assist in translation of printed materials to Spanish. Paratransit Services, the contract transit operator, also provides phone interpretation services for all languages through a service known as LifeLine. Other options continue to be explored through an ongoing process; however, these added costs may lead to reduction in service to the public as cuts to transit services may be necessary to stay within budgetary constraints.

Paratransit Services, the contract operator, trains its employees to adequately communicate with Spanish speaking patrons. Each employee receives a booklet on basic Spanish for transit employees. Employees are also trained on simple phrases to determine what the needs of the passenger are, to what destination they desire to travel, scheduling trips, and determining fares. These are reviewed

and refined at each training meeting. In addition, drivers use the schedule and map to assist non-English speaking patrons in determining departure/arrival times, destinations, and fares.

GTS staff noted that while it is widely known that language assistance is available by the general population of Glenn County, efforts should continue to be made to more widely advertise the fact that assistance is available.

LANGUAGE ASSISTANCE PLAN

Based on the analysis, GTS recognizes the need to continue to provide Spanish and other language services as needed within its service area at present levels. The following is a list of tasks outlining activities and services that will need to be developed and/or implemented during the next three fiscal years (July 1 2017 to June 30, 2020):

Task	Item	Estimated Completion Date	Estimated Cost
1.0	Review language assistance aids already in place.	6/30/2018 (annually thereafter)	\$4,000
1.1	Document those employees who speak Spanish and are willing to provide translation	6/30/2018	\$500
2.0	Identify language assistance products and services as needed.	1/31/2018 (annually thereafter)	\$4,000 - \$8,000
2.1	Develop budget and RFP to secure services (if necessary)	3/1/2018 (annually thereafter)	\$2,000
2.2	Translate any remaining outreach documents	6/30/2018	TBD (Based on contracted service costs.)
2.3	Post notices of language assistance in all legal notices, on website, in vehicles, and on schedules. Review annually	6/30/2018	\$250/notice \$4,000/annual review
3.0	Develop policy for future outreach efforts for all transit activities and ensure that future contracts acknowledge LEP needs	6/30/2018	\$15,000 - \$30,000
4.0	Review procedure for assisting LEP individuals and revise if necessary	5/31/2018 (annually thereafter)	\$4,000
5.0	Reviewing staff training on assisting LEP patrons and revise if necessary	5/31/2018 (annually thereafter)	\$6,000
6.0	Annually review Language Assistance Plan	6/30/2018 (annually thereafter)	\$4,000

The Glenn Transit Service, Executive Director or their designee will be responsible for overseeing the implementation of this plan and assigning tasks as appropriate. The plan will be reviewed on an annual basis with a report made to the Regional Transit Committee regarding progress made on implementation of the program elements and any changes or needs of the LEP population as observed by the contract transit operator.

EQUITY ANALYSIS

GTS has not undertaken any construction projects; therefore, it has not conducted an equity analysis.

DESCRIPTION OF SUBRECIPIENT MONITORING AND SCHEDULE OF SUBRECIPIENT TITLE VI PROGRAM SUBMISSIONS

GTS does not have any subrecipients at this time and does not anticipate expanding to include a subrecipient. In the unlikely case that GTS does expand and begins contracting with subrecipients, GTS will revisit this issue to ensure Title VI compliance.

TABLE DEPICTING MEMBERSHIP OF NON-ELECTED COMMITTEES
AND COUNCILS

GTS does not have any non-elected committees.

PUBLIC PARTICIPATION PLAN

As part of its Title VI Program, GTS is reviewing the strategies that it uses and may employ in the future to engage the public in the process of transportation decisions. This plan is utilized to continue to cultivate relations with the community and encourage interactions with the minority and non-English speaking communities. Public notices and general information will continue to be provided in both English and Spanish.

OPPORTUNITIES FOR PUBLIC COMMENT

GTS routinely provides opportunities for the public to provide input on transit matters and strives to find new opportunities to involve all segments of the population. Comments are accepted any time via phone, fax, e-mail, U.S. mail, in person or at any open meeting. Examples include:

- Monthly meetings of the Regional Transit Committee (GTS governing board which is a joint powers body). Public is always invited to these meetings and agendas are posted on-line, at the offices of the Glenn County Planning & Public Works Agency, and are mailed directly to individuals under certain circumstances.
- The Glenn County Transportation Commission holds annual public hearings at the regular meetings of the local governments it serves to learn about the transportation needs of the residents of Glenn County. The public is invited to attend these meetings to provide comments or to send comments via written communication regarding their input or concerns as they relate to transit service in Glenn County. Notices are posted at Planning & Public Works Offices, in the local newspaper, on the buses, and at other locations where flyers are sent such as local libraries, churches, and community centers.
- On occasion, rider surveys are conducted to allow riders to provide information on transit usage or to give input on proposed changes to transit service.

Notices are provided in English and Spanish.

ENGAGING TITLE VI PROTECTED GROUPS

GTS recognizes that there are some segments of the population from whom input is rarely, if ever, received. In an effort to provide more information and attempt to receive input from a truly representative public voice, GTS will make all significant service-related planning and policy publications available in accessible formats for the elderly and persons with disabilities through the following

1. Continue to be involved in the Social Services Transportation Advisory Council (SSTAC) which is made up of the following representatives:
 - One representative of potential transit users who are over age 60
 - One representative of potential transit users who are disabled
 - Two representatives of local social service providers for seniors
 - Two representative for local social service providers for the disabled
 - One representative from local social service providers for individuals of limited means
 - One representative from the local Native American tribe
 - One representative from GTS

2. Leverage contacts in the SSTAC to outreach to local groups representing seniors, the disabled, and other groups who do not regularly participate in discussions on transit issues.

PUBLIC OUTREACH

GTS attends various community events and provides presentations to local community groups to assist in gathering information and feedback on services frequently sought by LEP and the special needs population. Paratransit Services, the transit contract operator, also engages in a number of community events to promote transit usage among groups who rarely participate in public events hosted by GTS. These events include:

- Glenn County Fair
- Lamb Derby Community Event – Willows, CA
- Orland Parade (in connection with the Glenn County Fair) – Orland, CA
- Glenn County Health Fair
- Reality USA – an event for high school seniors to participate in mock life experiences
- Kindred Spirits of Glenn County (an adult disabled organization)
- Northern Valley Indian Health – various events held for clients and the community at large
- Other community events in support of individuals dealing with challenging health issues

GTS staff also reaches out to community service districts in areas where the LEP population is more concentrated. Most of these outreach efforts have been in the Hamilton City community.

STAFF ACCESSIBILITY

GTS relies on the Glenn County Planning & Public Works Agency (PPWA) for administrative staffing needs. PPWA staff administers contracts, grants, day-to-day back office administrative functions, required reporting, and asset management. As different individuals fill roles for GTS, for the purposes of this document and do designate a specific title for reference, PPWA staff to GTS will be referred to a Program Coordinator or GTS Program Coordinator. For transit management and operations, GTS relies on its contract operator, Paratransit Services, to be available to the public to provide all transit service information and coordinate services. The contract operator can utilize Language Line Solutions to assist persons of limited English proficiency and employs staff proficient in Spanish.

PLANNING DOCUMENTS

GTS tries to regularly update the planning documents it uses to make decisions on service changes and capital improvements related to the transit services it provides. In the development of all its planning documents, GTS has always reached out to the public in various ways to ensure input from a variety of sources. GTS will continue to do this and seek to use other innovative outreach techniques to enlarge the group it engages in the plan development process.

The Regional Transportation Plan (RTP) is a document that is reviewed every five years. Typically has been more focused on road improvements; however, the components of the plan dealing with transit service has become more relevant due to the increased use of transit in Glenn County. As this plan is developed and long term projects are identified, GTS will continue to work with the

Glenn County Transportation Commission (GCTC) to ensure that efforts are made to reach out to individuals who are considered LEP or to those who typically do not participate in long range planning by engaging these groups at meetings or activities identified with the assistance of the SSTAC. GCTC policy requires that the RTP have a 45 day comment and review period prior to adoption and that all comments received must be documented and responded to in writing. Where the comments result in significant changes to the RTP, an additional 45 day review period is provided.

DISCRIMINATION COMPLAINT PROCEDURE

Any person who believes that they have been discriminated against on the basis of race, color, or national origin by Glenn Transit Service may file a Title VI complaint by completing and submitting a GTS Title VI Complaint Form. GTS investigates complaints received no more than 180 days after the alleged incident. GTS will only process complaints that are complete.

The following procedures will be followed to investigate formal Title VI complaints:

- Complaint forms are available at the offices of the Glenn Transit Service at 777 N. Colusa St., Willows, CA 95988; the Paratransit Services office at 258 N. Butte St., Willows, CA 95988; Orland City Hall at 815 Fourth Street, Orland, CA 95963; or may be downloaded from the transit website at countyofglenn.net/transportation.
- In cases where the complainant is unable or incapable of providing a written statement, a verbal complaint may be made. The Program Coordinator will interview the complainant and, if necessary, assist the person in converting verbal complaints to writing. All complaints must, however, be signed by the complainant or their representative.
- Within 10 business days of receiving the complaint, the GTS Program Coordinator will review it to determine if GTS has jurisdiction. The complainant will receive an acknowledgement letter informing them whether the complaint will be investigated by GTS. The Glenn County ADA Coordinator will also be notified.
- If the complaint is to be investigated, additional information will be requested from the complainant or their representative. Said information must be submitted to the GTS Program Coordinator within 45 working days from the date of the original request. Failure of the complainant or their representative to submit the requested information may be considered good cause for a determination of no investigative merit.
- Within 30 days of the receipt of the complaint, the Program Coordinator shall supply the Executive Director with a status report of their investigation and/or resolution of the complaint with notification to the Glenn County ADA Coordinator.
- Within 90 working days of the receipt of the complaint, the Program Coordinator will prepare a written report for the Executive Director with a copy to the Glenn County ADA Coordinator. The report shall include the following:
 - A narrative description of the incident. Including persons or entities involved.
 - A statement of the issues raised by the complainant and the respondents reply to each of the allegations.
 - Citations of relevant federal, state and local laws, GTS policy, etc.
 - Description of the investigation, including a list of all the persons contacted and a summary of the interviews conducted.
 - A statement of the Program Coordinator's findings and recommendations for disposition.
- Upon review by the Executive Director, the report and findings will be forwarded to legal counsel for review.
- Based on the information before them, the Executive Director in consultation with legal counsel will make a determination on the disposition of the complaint. This determination shall be made within 10 working days of the Executive Director's receipt of the report from the Program Coordinator. Notice of the Executive Director's determination will be mailed to the complainant and contractor. Notice shall include information regarding appeal rights of

the complainant and instructions for initiating such an appeal. Examples of disposition include:

- Complainant is found to have been discriminated against. GTS or its contractor is therefore in non-compliance with Title VI regulations. Reasons for the determination would be listed along with remedial actions that GTS or the contractor will take.
- Complaint is found to be without merit. Reasons would also be listed.
- If the complainant is unsatisfied with the decision, they have 30 days after the date of the Executive Director's decision letter to appeal to the Regional Transit Committee or its designee. The complainant is entitled to review the denial, to present additional information and arguments, and separation of functions (i.e. a decision by a person not involved with the initial decision to deny eligibility). The complainant is entitled to receive written notification of the decision of the appeal and the reasons for it.
- The complainant may also file a complaint directly with the Federal Transit Administration, as follows: Title VI Program Coordinator, FTA Office of Civil Rights, East Building, 5th Floor – TCR, 1200 New Jersey Ave., S.E., Washington, D.C. 20590

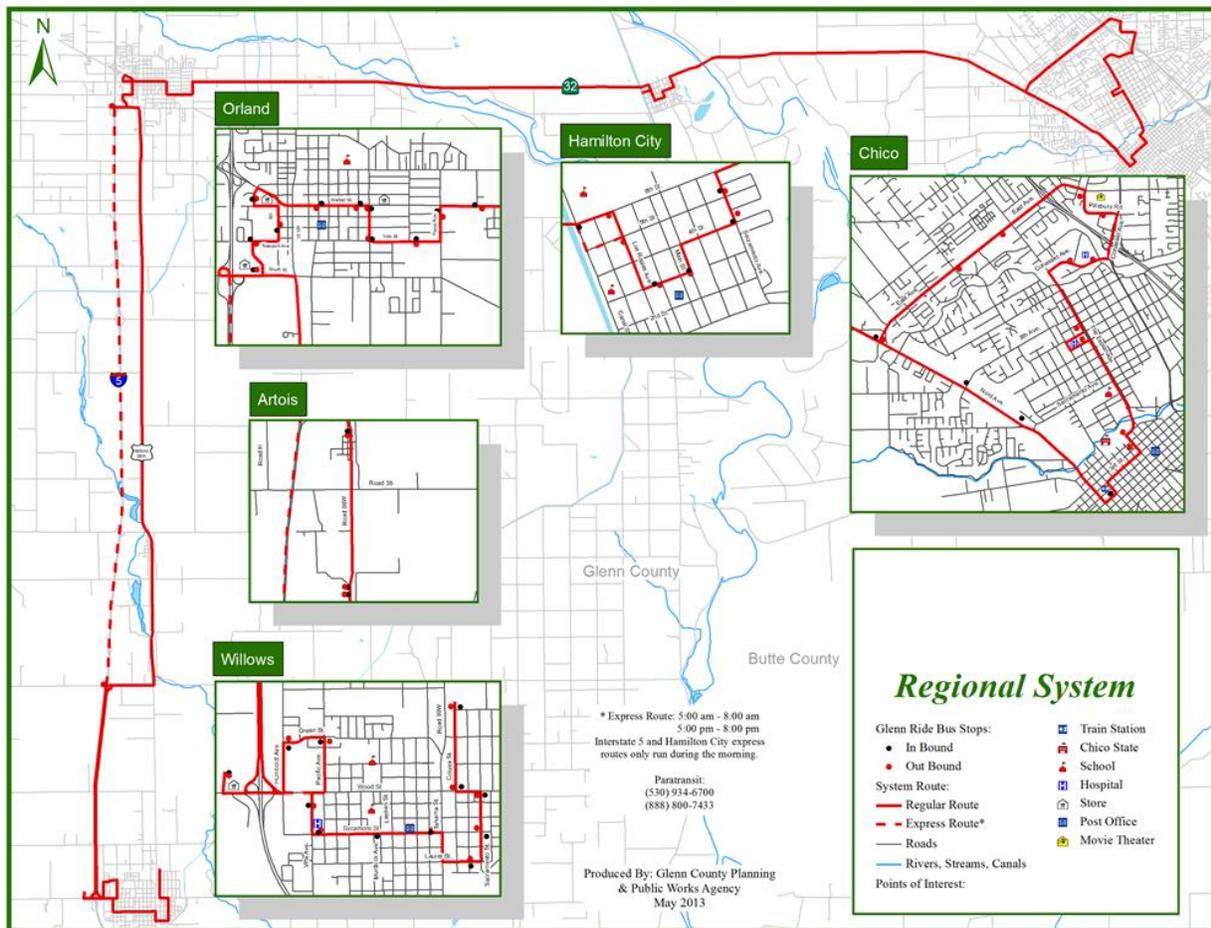
LIST OF TRANSIT-RELATED TITLE VI INVESTIGATIONS,
COMPLAINTS AND LAWSUITS

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

SERVICE STANDARDS AND POLICIES

GTS operates one rural intercity bus route (Glenn Ride) which operates into the adjacent county (see map below). This service does not meet the definition of a fixed route service; however, GTS is of the opinion that it should articulate and respond to the requirements with respect to service standards as they relate to Title VI. An overriding consideration for all aspects of transit services is the revenues with which transit operations are funded. As a rural transit system, GTS receives very little in reliable funding to operate transit services. GTS operates on a very thin budgetary margin where any unexpected expense can result in decreased service to the public. GTS has had to reduce service in the past due to the ancillary demands of program requirements and regulations pertaining to public transit including government mandated minimum wage increases. For this reason, GTS is cautious about incurring expenditures; especially those which are recurring.

Glenn Ride System Map



VEHICLE LOAD

Vehicle load is a ratio of the number of seats on a vehicle to the number of passengers. GTS demand response systems will not permit any passenger to stand. All seats are reserved by advance registration assuring a seat for each passenger. The intercity service has had vehicle load of 1.0 to

0.8 on a 39 or 38 seat vehicle during certain runs. Four 40 foot vehicles and are now in service and serve to maintain vehicle load ratios at or below 1.0. Should ridership push vehicle load ratios beyond 1.0, GTS will need to consider plans for decreased headway during peak times. Declining ridership makes this scenario unlikely within the next three years.

VEHICLE ASSIGNMENT

Vehicle assignment refers to the process by which transit vehicles are assigned to routes throughout the system due to variations among vehicles. (age, type, size, amenities), type of service offered (express or local), timing of vehicle assignment (time of day, day of week), and other factors.

For all services, GTS will only allow that safe and size appropriate vehicles to be used in service to the public. GTS operates only one intercity route using two vehicles during a typical service day. GTS does not have the luxury of multiple vehicles on multiple routes. Service vehicles must be able to handle the rigors of a long trip and accommodate all passengers. This determination is made by the transit operations contractor in conjunction with maintenance staff. As a rule, the largest and most capable vehicles, regardless of age, are used during peak times. Typically these vehicles are newer and equipped with features that provide increased rider safety and comfort.

VEHICLE HEADWAY

Vehicle headway is a measurement of the time interval between two vehicles traveling in the same direction on the same route. Vehicle headways are determined according to passenger demand and the availability of funding. The primary driver of decreasing headways on a fixed route is passenger demand. Evaluations are done annually to determine route adjustments that could be made to decrease headway. Current headway ranges from 1 hour, 15 minutes to 2 hours given the long distances. As mentioned previously, headway reduction may invariably be linked to vehicle load as GTS only operates one route. If vehicle loads begin to go beyond 1.0, vehicle headway reduction may be the only feasible means of lowering vehicle loads but will require the purchase of additional service vehicles.

ON-TIME PERFORMANCE

On-time performance is a measure of the percentage of runs that are completed as scheduled. In order to determine a percentage, "on-time" must be defined. GTS demand response services must be plus or minus 30 minutes of an appointment time to be considered on time. GTS intercity on-time performance is achieved when routes are plus or minus 15 minutes or 90% of all trips/runs are completed as scheduled.

DISTRIBUTION OF TRANSIT AMENITIES

Transit amenities refer to items of comfort and convenience available to the general riding public such as benches and shelters. GTS does not have full decision making authority over siting amenities. Ideal locations may not ultimately have rider amenities installed if they conflict with local regulations. In some cases, the cost of compliance with local ordinances may make the project

infeasible. Some locations would require small acquisitions of private land which have or may push the cost to where GTS cannot reasonably install the desired amenity. GTS strives to provide rider amenities at all of its stops within Glenn County; although, there is no formal policy at this time. Those areas where there where installation is relatively simple, where public right-of-way is adequate, accessible as required by the Americans with Disabilities Act, and there is strong local government support are targeted by GTS to at least provide something to its riders. GTS continues to work with state and local governments on the placement of future rider amenities as budgets allow. GTS carefully considers the cost of structure maintenance before installation due to limited funding resources.

At each marked stop, a schedule is attached to allow the public to see stops made at the location for inbound or outbound trips. Schedules are available at the contract operator's office, on each vehicle, and in local social services offices. Work to leverage mobile devices to provide real-time information to passengers may be available in the future; however, a cost and feasibility analysis has not been completed.

SERVICE AVAILABILITY

Service availability is a general measure of the distribution of routes within a transit district. GTS only has one intercity route. The goal of the service is to provide transportation to medical appointments, education opportunities, employment opportunities, life necessities (i.e. grocery shopping, personal care, etc.), and other needs. This one route was instituted to reach the more populated areas at locations where the transit depend frequent, incorporate needed or desired destinations, and reduce headway to keep the service frequent and relevant to Glenn County residents.

GTS must also meet state and local government requirements when siting a new stop. This requires a permit process which is generally accompanied by a request to remove public parking to allow curb access for transit vehicles. Additionally, if the locations do not comply with the requirements of the Americans with Disabilities Act (ADA) GTS must consider the additional expense of providing those required facilities before a particular location may be used as stop. GTS has endeavored to maintain good relations with local governments and neighboring transit systems. To facilitate further transportation in the neighboring county, GTS has co-located stops with the adjacent transit service so that patrons can physically transfer from one service to the other more easily.

APPENDICES

APPENDIX A: TITLE VI PUBLIC NOTICE

GLENN TRANSIT SERVICE

TITLE VI NOTICE TO THE PUBLIC

- Glenn Transit Service (GTS) operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with GTS.
- For more information on GTS's civil rights program, and the procedures to file a complaint, contact (530) 934-6530; e-mail transit@countyofglenn.net; or visit our administrative office at: 777 N. Colusa St., Willows, CA 95988. For more information, visit www.countyofglenn.net/transportation.
- A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., S.E., Washington, DC 90590.

GLENN TRANSIT SERVICE

TÍTULO VI AVISO AL PÚBLICO

- Glenn Transit Service (GTS) maneja sus programas y servicios sin distinción de raza, color y origen nacional, conforme a Título VI del Acta de Derechos Civiles. Cualquier persona que cree o que ha sido perjudicada por una práctica discriminatoria ilegal bajo el Título VI, usted puede presentar una queja ante GTS.
- Para obtener más información sobre el programa de GTS de derechos humanos civiles, y los procedimientos para presentar una queja, comuníquese al (530) 934-6530; correo electrónico transit@countyofglenn.net; o visite nuestra oficina administrativa: 777 North Colusa Street, Willows, CA 95988. Para obtener más información, visite www.countyofglenn.net/transportation.
- Quejas pueden ser presentadas directamente con la Administración Federal de Tránsito ante la Oficina de Derechos Civiles, Atención: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave, S.E., Washington, DC 90590.

Have you filed this complaint with any other federal, state, or local agency; or with any federal or state court? Yes No

If yes, please check all that apply:

- Federal Agency Federal Court
 State Agency State Court
 Local Agency

Please provide information about the contact person at the agency/court where the complaint was filed:

Name: _____

Address: _____

City, State, and Zip Code: _____

Telephone: _____

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

Signature

Date

Please mail this form to:

Glenn Transit Service
Attn: Program Manager
PO Box 1070
Willows, CA 95988

Por favor, marque todo lo que aplique:

- Agencia Federal Tribunal Federal
 Agencia Estatal Corte Estatal
 Agencia Local

Por favor proporcione información de la persona de contactó en la corte o agencia donde presento su queja:

Nombre: _____

Dirección: _____

Ciudad, Estado, y Código Postal: _____

Número de Teléfono: _____

Por favor firme abajo. Usted puede proporcionar cualquier material por escrito o cualquier otra información que usted considere pertinente a su queja.

Firma

Fecha

Por favor envíe este formulario a:

Glenn Transit Service
Attn: Program Manager
PO Box 1070
Willows, CA 95988

APPENDIX C: PROCESO DE QUEJAS POR TITULO VI

Cualquier persona que cree que ha sido discriminado por motivo de raza, color o origen nacional por Glenn Transit Service (GTS) puede presentar una queja bajo el Título VI por medio del formulario de queja Título VI GTS después de rellenar y enviar. GTS investiga quejas recibidas no más de 180 días después del supuesto incidente. GTS sólo procesará las quejas que estén completas.

Los siguientes procedimientos se seguirán para investigar quejas formales bajo el Título VI:

- Los formularios están disponibles en las oficinas de Glenn Transit Service, 777 N. Colusa St., Willows, CA 95988; la oficina de Paratransit Services, 258 N. Butte St., Willows, CA 95988; Orland City Hall, 815 Fourth Street, Orland, CA 95963; o se puede descargar en la página de sitio de tránsito, www.countyofglenn.net/transportation.
- En casos donde el demandante es incapaz de proporcionar una declaración por escrito, se puede hacer una queja verbal. El Coordinador del programa entrevistara al demandante, y si es necesario, ayudar a la persona poner su queja verbal por escrito. Sin embargo, todas las quejas deberán ser firmadas por el demandante o su representante.
- Dentro de 10 días hábiles después de recibirla queja, el Coordinador del programa la revisara para determinar si GTS tiene jurisdicción. El demandante recibirá una carta de reconocimiento que le informara si la queja será investigada por GTS. También se notificará al Coordinador de ADA del Condado de Glenn.
- Si la queja va a ser investigada, se solicitará información adicional del demandante o su representante. Dicha información deberá ser presentada a la Coordinadora del programa GTS dentro de 45 días laborables de la fecha de la solicitud original. Si el demandante o su representante faya presentar la información solicitada puede considerarse buena causa para determinar ningún mérito investigativo.
- Dentro de 30 días de haber recibido la queja, el Coordinador del programa deberá elaborar un informe de su investigación o resolución de la queja al Director Ejecutivo y notificar al Coordinador de ADA del Condado de Glenn.
- Dentro de 90 días hábiles de haber recibido la denuncia, el Coordinador del programa elaborará un informe por escrito el Director Ejecutivo, con una copia al Coordinador de ADA del Condado de Glenn. El informe deberá incluir lo siguiente:
 - Una descripción narrativa del incidente. Incluyendo personas o entidades involucradas.
 - Una declaración de las encuestas hechas por el demandante y las respuestas de cada encuesta.
 - Citas de las leyes federales, estatales y locales, pólizas de GTS, etcétera.
 - Descripción de la investigación, incluyendo una lista de todas las personas contactadas y un resumen de las entrevistas realizadas.
 - Una declaración de los resultados del Coordinador del programa y recomendaciones de disposición.
- Una vez revisada por el Director Ejecutivo, se enviara el informe y resultados al asesor legal para ser analizados.
- El Director Ejecutivo bajo el asesoramiento legal tomará la disposición de la queja. Esta disposición se hará dentro de 10 días hábiles por el Director Ejecutivo después de recibir el informe de la Coordinadora del programa. Aviso de la determinación del Director Ejecutivo será enviado el demandante y al contratista. La notificación deberá incluir información

sobre los derechos de apelación del demandante y las instrucciones para iniciar tal apelación. Ejemplos de disposición incluyen:

- Se determinó que el demandante fue discriminado. Por lo tanto, GTS o su contratista están en incumplimiento bajo las regulaciones de Título VI. Se numeraran las razones de determinación junto con acciones correctivas que GTS o el contratista tomaran para rectificar.
- La queja se encuentra sin mérito. Las razones también serán numeradas.
- Si el demandante no está satisfecho con la decisión, tienen 30 días de la fecha de la carta de decisión del Director Ejecutivo para apelar al Comité Regional de Transito o por su representante. El demandante tiene el derecho de revisar la negación, y presentar información adicional, argumentos y separación de funciones (es decir, una decisión hecha por otra persona no implicada en la decisión inicial cuál tal fue negada). El demandante tiene el derecho de recibir notificación por escrito de la decisión de la apelación y los motivos.
- El demandante puede presentar una queja directamente con la Administración Federal de Tránsito ante la Oficina de Derechos Civiles, Atención: Title VI Program Coordinator, FTA Office of Civil Rights, East Building, 5th Floor – TCR, 1200 New Jersey Ave., S.E., Washington, D.C. 20590.