



*KINGS COUNTY AREA
PUBLIC TRANSIT AGENCY*

**TITLE VI PROGRAM UPDATE
REVISION 1
JUNE 2019 – 2022**



KINGS COUNTY AREA PUBLIC TRANSIT AGENCY
610 W 7TH Street
Hanford CA 93230

Title VI Contact: Angie Dow, Executive Director
angie.dow@co.kings.ca.us
(559) 852-2691

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1. INTRODUCTION

Kings County Area Public Transit Agency (KCAPTA) has prepared this Title VI Program (Program) update in compliance with Title 49 CFR Section 21.9(b) and the Federal Transit Administration's (FTA) Circular 4702.1B "Title VI Requirements and Guidelines for Federal Transit Administration Recipients", issued on October 1, 2012. This update will cover the period from June 1, 2019 to June 1, 2022.

The Program documents the steps KCAPTA has taken and will continue to take to ensure that its transit services are provided without discrimination against individuals on the basis of race, color, or national origin. In addition to Title VI protections, KCAPTA does not discriminate against any other class protected by federal or state law. A copy of Resolution 19-04 approving this 2019 Program update can be found in **Attachment A**.

Any questions regarding this Title VI Program update should be directed to:

Kings County Area Public Transit Agency
610 W 7th Street
Hanford, CA 93230

Title VI Contact: Angie Dow, Executive Director
angie.dow@co.kings.ca.us
(559) 852-2691

2. GENERAL REQUIREMENTS

This section addresses the general requirement outlined in Chapter III of FTA Circular 4702.1B Supporting documentation is identified within the document and as attachments to this report.

Title VI Notice to Public

KCAPTA is committed to ensuring that the public is aware of the rights and protections afforded to them under Title VI. In accordance with 49 CFR 21.9(d) and guidance provided in FTA Circular 4702.1B Chapter III-4, KCAPTA's Title VI Notice of Rights (Notice) includes:

1. A statement that the agency operates its programs without regard to race, color, or national origin;
2. A description of the procedures the public should follow in order to request additional information of the recipient's Title VI obligations;
3. A description of the procedures members of the public shall follow in order to file a Title VI discrimination complaint.

KCAPTA's Notice of Rights (Notice) has been translated into the one safe harbor language identified in KCAPTA's Language Assistance Plan (LAP); Spanish. The Notice also includes KCAPTA's Notice of Language Assistance and contact information for assistance obtaining information regarding KCAPTA's Title VI obligations and the procedures for filing a Title VI discrimination complaint.

The Notice can be found on KCAPTA's website at <https://www.kartbus.org/title-vi-dbe/> and is posted on KCAPTA buses, at the KART Transit Station, and at KCAPTA Administrative Office.

A copy of KCAPTA's Notice of Rights is included in **Attachment B**. A list of posting locations is included in **Attachment C**.

Title VI Complaint Procedures & Forms

As part of KCAPTA's commitment to ensuring that no person is discriminated against on the basis of race, color, or national origin, and to ensure compliance with 49 CFR Section 21.9(b) and guidance provided in FTA Circular 4702.1B Chapter III-5, KCAPTA has developed a Title VI complaint process and complaint form for investigation and tracking all Title VI complaints.

KCAPTA investigates complaints that allege discrimination based on race, color, or national origin. Complaints must be filed in writing within 180 days from the date of the alleged discrimination, and all Title VI complaints are investigated according to KCAPTA Title VI complaint process. A copy of KCAPTA's administrative Title VI complaints process and investigation process is included in **Attachment D**.

The Title VI complaint form and process can be found on KCAPTA's website at <https://www.kartbus.org/title-vi-dbe/>. Both the complaint form processes have been translated into the one safe harbor languages identified in KCAPTA's Language Assistance Plan. A copy of the Title VI complaint form and process in English are included in **Attachment D**.

List of Investigations, Complaints, or Lawsuits

To ensure compliance with 49 CFR Section 21.9(b) and guidance provided in FTA Circular 4702.1B Chapter III- 5, KCAPTA maintains a list of all complaints, investigations, and lawsuits alleging discrimination by KCAPTA on the basis of race, color, or national origin. As required, the list includes the date of the complaint, investigation, or lawsuit; a summary of the complaint, investigation, or lawsuit and the action taken in response to the complaint, investigation, or lawsuit. To date KCAPTA has received no Title VI complaints and no lawsuits have been filed against KCAPTA.

Public Participation Plan

In accordance with 49 CFR Section 21.9 (b), FTA Circular 4702.1B Chapter III-5, KCAPTA has updated its Public Participation Plan (PPP, Plan) to identify effective methods to communicate with and engage all of its stakeholders regardless of race, color, or national origin, including populations and individuals who may be underserved because of limited English proficiency, minority or socioeconomic status, or disability. Additionally, KCAPTA's PPP reflects the principles of FTA Circular 4703.1 which guides public transit providers to integrate the principles of environmental justice into the transportation decision-making process.

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 KCAPTA's Public Participation Plan in **Attachment E**.

Language Assistance Plan For Persons with Limited English Proficiency

KCAPTA upholds the goals of the Title VI of the Civil Rights Act of 1964, Federal Executive Order 13166, and the Department of Transportation's Limited English Proficiency Guidelines by ensuring that all persons, regardless of race, color, or national origin, are afforded meaningful access to its transit services.

In accordance with guidance provided in FTA Circular 47002.1B Chapter III-6, KCAPTA has conducted a Four Factor Analysis to determine the level of language assistance that will be provided to LEP individuals within its service area.

KCAPTA used the following required four factors to determine its obligation to accommodate LEP populations;

Factor 1: The number or proportion of LEP persons eligible to be serviced or likely to be encountered by a program, activity, or service of the recipient or grantee of federal funding;

Factor 2: The frequency with which LEP individuals come in contact with the program;

Factor 3: The nature and importance of the program, activity, or service provided by the recipient to peoples' lives; and

Factor 4: The resources available to the recipient.

KCAPTA updated its 2016 Four Factor Analysis to determine the current language assistance needs of its stakeholders. KCAPTA utilized the results of the analysis to create a Language Assistance Plan (LAP) that would provide the appropriate level and type of assistance for its customers.

KCAPTA's Language Assistance Plan and Four Factor Analysis can be found in **Attachment F**.

Membership of Non-elected Committees

KCAPTA does not approve appointment to the one (1) non-elected committee: The Social Service Transportation Advisory Council (SSTAC) was established to provide broad representation of social services and transit providers representing the elderly, the disabled, and persons of limited means. Members of the SSTAC are appointed by Kings County Association of Governments (KCAG) Board of Directors. Table 1 indicates the racial/ethnicity breakdown of the 2018 membership of the SSTAC. The number of Hispanic members serving on the SSTAC is the second highest group, which has historically increased with recruitment efforts to encourage greater public participation from LEP groups.

Table 1 – Social Service Transportation Advisory Council

	Gender		Race/Ethnicity					
	Male	Female	White	African American	Native American	Asian American	Hispanic	Other
No.	8	16	12	3	0	0	9	0
Percent of Total Council	33%	67%	50%	12%	0%	0%	38%	0%

The main purpose of the SSTAC is to serve as an advisory body to the KCAG Transportation Policy Committee (TPC) regarding the transit needs of the elderly, disabled, and low-income citizens. Responsibilities of the SSTAC include providing input to the TPC on the needs of current and potential fixed-route and paratransit users.

Sub-recipient Assistance and Monitoring

Pursuant to 49 CFR 21.5(b)(1) (vii) and guidance provided in FTA Circular 4702.1B Chapter III-10 primary recipients must monitor their sub-recipients for compliance with Title VI regulations. KCAPTA does not allocate or pass through funding to sub-recipients; as such, there is no sub-recipient monitoring to report.

KCAPTA contracts with MV Transportation, Inc. (MV) to provide fix routed, paratransit, and demand response services, as well as reservation, dispatch, and revenue vehicle maintenance. KCAPTA ensures that this contractor complies with Title VI by monitoring the following activities:

1. KCAPTA provides its Title VI Program to MV and receives their acceptance upon each Program update.
2. KCAPTA's Executive Director has provided MV's administrative staff and operation supervisors with the same Title VI training it provides to its own employees. Special "train the trainer" sessions have been provided to MV's general manager and operations supervisors who in turn provide the training to all new hires. Employees receive regular refresher training in Title VI regulations and responsibilities.
3. MV maintains a copy of KCAPTA's Title VI Program at both the KART Transit Station and Dispatch/Maintenance Facility in an area fully accessible to its employees. A copy of the Title VI complaint form and process are posted on the employee bulletin board.
4. KCAPTA's Title VI Notice of Rights is posted in all buses.

5. MV reports all Title VI complaints to KCAPTA within 24 hours and KCAPTA's Transit Manager handles all complaints following the same procedures outlined in **Attachment D**.

Board Meeting Minutes and Resolutions

The Board meeting minutes from consideration of this Title VI Program, and the associated resolution, will be included in **Attachment A**.

Construction Projects

KCAPTA has undertaken no significant construction projects during this reporting period. For any construction projects that require documentation under Title VI Circular 4702.1B and environmental justice analysis will be prepared and submitted separately as allowed under the circular.

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 have been provided at this time.

3. FIXED ROUTE TRANSIT PROVIDER REQUIREMENTS

In accordance with 49 CFR 21.9 and guidance provided in FTA Circular 4702.1B Chapter IV, service standards and policies are required for fixed route services, and are optional for demand response services. The standards and policies must address how services and amenities are distributed across the transit system and must ensure that service design and operations practices do not result in discrimination on the basis of race, color, or national origin. Transit providers that operate 50 or more fixed route vehicles in peak service and are located in a UZA of 200,000 or more in population are required to provide additional demographic and service data; however, KCAPTA does not meet this threshold.

4. SYSTEM-WIDE SERVICE STANDARDS AND POLICIES

Specific service standards are required for the following indicators: 1) vehicle load; 2) vehicle headways; 3) on-time performance; 4) service availability (a measure of how routes are distributed within the service area). In addition to the federal requirements for service allocation standards and policies, the Transportation Development Act in California mandates farebox recovery standards.

1. *Service Availability*

Fixed route bus service will serve 80 percent of the population in urban areas within half a mile. Service will be provided to all rural communities exceeding 1,000 in population.

2. *Vehicle Load*

The average of all loads during the peak operating period should not exceed vehicles' achievable capacities, which is 40 passengers for a low-floor 35 foot buses.

On-Time Performance

A vehicle is considered on time 1) if it departs at the schedule departure time or within five (5) minutes of the scheduled departure time and 2) if it arrives within five (5) minutes of the scheduled arrival time. KCAPTA's objective is 85% or greater.

Farebox Recovery Ratio

Per the California Transportation Development Act KCAPTA is required to achieve a fifteen (15) percent farebox recovery ratio.

Table 2: Vehicle Load, On-Time Performance, and Farebox Recovery Ratio

Mode	Vehicle Load	On-Time Performance	Farebox Recovery
Fixed Route			
Local	1.33		
Regional	1.33		
System-wide		85%	15%

3. *Vehicle Headways – Fixed Route*

KCAPTA has no headway standard for its routes, as its services are designed with input from the communities to be serviced. KCAPTA annually evaluates the productivity of its routes; if productivity falls below the performance goal established in the Transportation Development Plan KCAPTA works with the community to develop corrective actions to improve, consolidate, or cancel the service. Lemoore City Routes 30 & 31 is an example of staff working with the community to develop a corrective action.

Table 3: Local Routes (as of March 1, 2019)

Route	Weekday Peak/Off Peak Headways
Hanford Routes 1 – 5	60/60
Hanford Route 6	30/30
Hanford Route 7 & 9	60/60
Hanford Route 8	60/0
Lemoore Route 20	30/30
Lemoore City Route 31 & 31	General Public Dial-A-Ride

Table 4: Regional Routes (as of March 1, 2019)

Route	Weekday Peak/Off Peak Headways
Avenal Route 12	4 trips per weekday/ 2 trips Saturday
Corcoran Route 13	2 trips per weekday/0
Laton Route 14	2 trips per weekday/0
Visalia Route 15	3 trips per weekday/0
Fresno Route 17	2 trips per weekday/0
Lemoore NAS Route 21	5 trips per weekday/0
Lemoore NAS OPS Route 22	2 trips per weekday/0

System-Wide Service Policies

KCAPTA service policies do not discriminate based on race, color, or national origin. KCAPTA System-wide service policies for the following service indicators ensures service design and operations practices do not result in discrimination on the base of race, color, or national origin: 1) distribution of transit amenities (including seating, shelters, printed and digital information and waste receptacles); and 2) vehicle assignment.

1. *Distribution of Transit Amenities*

KCAPTA transit amenities include bus stop signs, benches, shelters, waste receptacles, transit center, and information including printed signs, route maps, schedules, and digital equipment.

The following factors are considered in the determination of how bus stops are improved: passenger volume, access to major activity centers, site specific considerations, accessibility for persons with disabilities, safety, and availability of resources.

KCAPTA follows the following general guidelines for specific amenities:

- New bus shelters, benches and waste receptacles should be provided at stops where 10 passengers or more per day are expected to board buses (safety, space and resources permitting)
 - Bus benches and waste receptacles should be provided at stops where 5 passengers or more per day are expected to board buses (safety space and resources permitting).
 - Printed information, including route maps and schedule information are provided at the transit center. All bus stops in the system are identified by a standard bus stop sign and include a printed route schedule.
 - Real-time digital information signage is provided at the transit center.
2. *Vehicle Assignments*
KCAPTA operates the fixed routes with CNG low floor 35 foot buses. Bus assignments take into account the operating characteristics of the bus and route. Typically newer buses are assigned to regional routes due to the distance traveled and response time to resolve mechanical issues.
3. *Performance Monitoring*
KCAPTA will periodically review the performance of its routes and the distribution of its assets to assess adherence to its adopted standards and policies. A comprehensive evaluation will be conducted at least triennially, based on data collected for National Transit Database reporting. In addition to the triennial monitoring, KCAPTA will attempt to conduct the following monitoring activities:
- On-time performance and farebox recovery rates are reported to the Board of Directors on a monthly base.
 - Service availability, headways, and vehicle assignments will be evaluated during major service changes, comprehensive operation analysis, and other similar planning studies.

Based on the results of the performance monitoring, KCAPTA will prioritize its corrective actions for the lowest-performing routes.

5. LIST OF ATTACHMENTS

- ATTACHMENT A – Board Resolution
- ATTACHMENT B – Title VI Notice of Rights
- ATTACHMENT C - List of Posting Locations
- ATTACHMENT D – Complaint Form/Instruction & Internal Procedures for Investigating and Tracking
- ATTACHMENT E – Public Participation Plan
- ATTACHMENT F – Language Assistance Plan

ATTACHMENT A

Board Approval of KCAPTA's 2019 Title VI Program Update

RESOLUTION NO. 19-04

BEFORE THE BOARD OF DIRECTORS
OF THE KINGS COUNTY AREA PUBLIC TRANSIT AGENCY

IN THE MATTER OF ADOPTION OF)
KINGS COUNTY AREA PUBLIC TRANSIT)
AGENCY TITLE VI PROGRAM)
2019 UPDATE)

RESOLUTION NO. 19-04
RE: TITLE VI PROGRAM
2019 UPDATE

WHEREAS, the Kings County Area Public Transit Agency ("KCAPTA") is a joint powers agency made up of the County of Kings, the City of Hanford, the City of Lemoore, and the City of Avenal (collectively, "member agencies", and individually, a "member agency"); and

WHEREAS, KCAPTA receives federal funds to provide public transportation to Kings County; and

WHEREAS, KCAPTA is committed to ensuring that no person shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any KCAPTA programs, services or activity regardless of the funding sources; and

WHEREAS, KCAPTA must promote full and fair participation in public transportation decision-making; and

WHEREAS, KCAPTA must ensure meaningful access to transit-related programs and activities by persons with limited English proficiency; and

WHEREAS, KCAPTA is required by the Federal Transit Administration to prepare and submit a Title VI Program reaffirming its commitment to nondiscrimination every three years.

NOW, THEREFORE, BE IT RESOLVED, by the Board of Directors of the Kings County Area Public Transit Agency approves its 2019-2022 Title VI Program.

The foregoing Resolution was adopted on a motion by Commissioner _____, seconded by Commissioner _____, at a regular meeting held on May 22, 2019 by the following vote:

AYES:
NOES:
ABSENT:
ABSTAIN:

KINGS COUNTY AREA PUBLIC TRANSIT AGENCY
BOARD OF DIRECTORS

Board Chairman

WITNESS, my hand this ____ day of _____, 2019.

Clerk of the Board

Angie Dow, Executive Director

ATTACHMENT B

Title VI Notice of Rights



Title VI Notice of Rights

KCAPTA operates its programs and services without regard to race, color, or national origin in accordance with Title VI of the Civil Rights Act of 1964 and the Department of Transportation Regulations 49 CFR Part 21. If you believe you have been subjected to discrimination as prohibited by Title VI, you may file a written complaint with KCAPTA or with the Federal Transit Administration.

For more information on KCAPTA's Title VI program, and the procedures to file a complaint, contact (559) 852-2717, email: info@kartbus.org, or visit our administrative office at 610 W 7th Street, Hanford CA 93230.

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

If information is needed in another language, contact (559) 852-2717

KCAPTA opera programas y servicios sin tener en cuenta raza, color o origen nacional de conformidad con el Título VI de la Ley de Derechos civiles de 1964 y el Reglamento del Departamento de Transporte 49 CFR parte 21. Si usted cree que ha sido discriminado según prohibido por el Título VI, puede presentar una queja por escrito a KCAPTA o con la Administración Federal de Tránsito.

Para más información sobre el Programa de Título VI de KCAPTA y los procedimientos para presentar una queja, comuníquese al (559) 852-2717, correo electrónico: info@kartbus.org, o visite nuestra oficina administrativa al 610 W 7th Street, Hanford CA 93230.

Un reclamante puede presentar una queja directamente ante la Administración Federal de Tránsito presentando una queja ante la Oficina de Derechos Civiles Atención: Coordinador del Programa Título VI, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.

Si se necesita información en otro idioma, llame al (559) 852-2717

ATTACHMENT C

List of Title VI Notice Posting Locations

At a minimum the Title VI Notice will be posted at the following locations.

1. KART Transit Station
 - a. Midway Kiosk
 - b. Ticket Sales/ Information Window
 - c. Driver Break Room
2. KCAPTA Administrative Office
 - a. Reception area
 - b. Employee Bulletin Board
3. KCAPTA Dispatch /Maintenance Facility
 - a. Reception Area
 - b. Break Room
 - c. Mechanic Break Room
4. KCAPTA website <https://www.kartbus.org/title-vi-dbe/>
5. In KCAPTA Buses

ATTACHMENT D

**Title VI Complaint Form/Instruction
and
Internal Procedures for Investigating and Tracking**

**KCAPTA****Kings County Area Public Transit Agency**610 W. 7th St. • Hanford, CA 93230 • (559) 852-2692 • www.kartbus.org**KINGS COUNTY AREA PUBLIC TRANSIT AGENCY****TITLE VI****COMPLAINT FORM****Section I:**

Name:

Address:

Telephone (Home):

Telephone (Work):

Email Address:

Accessible Format Requirements?

Large Print

TDD

Audio Tape

Other

Section II:

Are you filing this complaint on your own behalf?

Yes*

No

*If you answered "Yes" to this question, go to Section III

If not, Please supply the name and relationship of the person for whom you are complaining:

Please explain why you have filed for a third party:

Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.

Yes

No

Section III:

I believe the discrimination I experienced was based on (check all that apply):

☐ Race☐ Color☐ National Origin

Date of Alleged Discrimination (Month, Day, Year): _____

Explain as clearly as possible what happened and why you believe you are discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.

Section IV:

Have you previously filed a Title VI complaint with this agency?

Yes

No

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Kings County Area Public Transit Agency

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**KINGS COUNTY AREA PUBLIC TRANSIT AGENCY
TITLE VI
COMPLAINT FORM**

Section V:

Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State Court?

☐ Yes ☐ No

If yes, check all that apply:

☐ Federal Agency: _____

☐ Federal Court: _____ ☐ State Agency: _____

☐ State Court: _____ ☐ Local Agency: _____

Continue on Next Page

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

Name: _____

Title: _____

Agency: _____

Address: _____

Telephone: _____

Section VI

Name of agency complaint is against: _____

Contact person: _____

Title: _____

Telephone number : _____

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

Signature and date required below

Signature

Date

Please submit this form in person at the address below, or mail this form to:

Kings County Area Public Transit Agency

Title VI Complaint

610 W 7th Street

Hanford CA 93230

**KCAPTA****Kings County Area Public Transit Agency**610 W. 7th St. • Hanford, CA 93230 • (559) 852-2692 • www.kartbus.org

**KINGS COUNTY AREA PUBLIC TRANSIT AGENCY
TITLE VI
COMPLAINT INSTRUCTION**

In compliance with U.S. Department of Transportation Title VI regulations (49 CFR Part 21), Kings County Area Public Transit Agency (KCAPTA) operates without regard to race, color, or national origin. Any person who believes he or she has been discriminated against by KCAPTA on the basis of race, color, or national origin may file a Title VI complaint.

A Title VI complaint form can be downloaded at <https://www.kartbus.org/title-vi-dbe/> or by calling (559) 852-2717. If the complainant is unable to write a complaint, a representative may file on his/or her behalf, or KCAPTA staff will provide assistance. Complaints must be filed within 180 calendar days of the alleged incident.

1. KCAPTA will contact the complainant within 10 business days of receipt of complaint.
Any requested information must be received by KCAPTA within 5 days of request
2. KCAPTA will begin the investigation within 15 business days of receipt of complaint if the alleged discrimination is found to be a violation of Title VI regulations.
3. KCAPTA will complete the investigation within 60 calendar days of receipt of a complaint. If additional time is needed for the investigation, the complainant will be notified. A written investigation report will be prepared, including a summary of the incident, investigative findings, and recommended corrective action.
4. A closing letter will be provided to the complainant. The complainant will have 5 business days from the receipt of the closing letter to file an appeal. If no appeal is filed, the complaint will be closed.
5. KCAPTA will forward a copy of the investigation report to the appropriate federal agency, if required.

* KCAPTA will process and investigate all complaints that meet the requirements of Title VI discrimination. If the complainant fails to provide required information within the required timeframe, the complaint may be closed.

Complaint forms should be mailed to KCAPTA, Title VI Complaint, 610 W 7th Street, Hanford CA 93230.

Complaints may also be filed with the Federal Transit Administration, Office of Civil Rights, East Building, 5th Floor – TCR, 1200 New Jersey Ave., SE, Washington DC 20590 or online at <https://www.transit.dot.gov/regulations-and-guidance/civil-rights-ada/fta-civil-rights-complaint-form>

If you need assistance filling out the form or need language assistance contact KCAPTA at (559) 852-2717.



**KINGS COUNTY AREA PUBLIC TRANSIT AGENCY
TITLE VI
INTERNAL PROCEDURES FOR INVESTIGATING AND TRACKING**

The following is a summary of the complaint procedures:

Title VI Administrator Procedures

1. Maintain log of service reports that are potential Title VI claims. These are claims the customer or KCAPTA, Transit Assistant have identified as discrimination based on information available when the service 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 Form (if not previously provided). Forms are available for download from the website or as hard copies sent by mail or picked up by complainant at KCAPTA 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 Complaint 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 KCAPTA's Transit Assistant that the 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 by the appropriate manager (e.g. MV – driver re-training, discipline; KCAPTA staff education and/or discipline)
6. Research existing information and attempt to determine employee who is the subject of the complaint. Determine who will be conducting investigation (in most cases this will be the Operations Contactor, MV) to 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 and 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 recommendations 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 finding within 60 days of receipt of the complaint form.
14. Notify investigator of finding (including determination letter)
15. Send Investigation Report to Executive Director. Complainant has 60 days after receipt of determination letter to appeal findings to the Executive Director.
16. Update complaint file and log.



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**KINGS COUNTY AREA PUBLIC TRANSIT AGENCY
TITLE VI
INTERNAL PROCEDURES FOR INVESTIGATING AND TRACKING**

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 10 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.

ATTACHMENT E

Public Participation Plan and Summary of Public Outreach Efforts



Kings County Area Public Transit Agency

**PUBLIC
PARTICIPATION
PLAN**

Effective: June 2019 – June 2022

Kings County Area Public Transit Agency
610 W 7th Street
Hanford CA 93230

Title VI Contact: Angie Dow, Executive Director
angie.dow@co.kings.ca.us
(559)852-2691



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1. INTRODUCTION

This Public Participation Plan (PPP, Plan) has been developed in accordance with 49 U.S. C. Sections 5307 (b) and 5307(c) (1) (1); the requirements of the U.S. Department of Transportation (USDOT), including the Federal Transit Administration' (FTA) Circular 4702.1B "Title VI Requirements and Guidelines for Federal Transit Administration Recipients" issued on October 1, 2012, and Circular 4703.1 "Environmental Justice Policy Guidance for FTA Recipients" issued on December 11, 2012. The Plan also complies with Title VI of the Civil Rights Act of 1964. Compliance with these regulations and guidelines ensures that Kings County Area Public Transit Agency (KCAPTA) provides an opportunity for inclusive and accessible public engagement in its transportation decision – making process.

KCAPTA is committed to providing early, continuous, and meaningful public engagement processes for its stakeholders regardless of race, color, or national origin, including populations and individuals who may be underserved because of limited English proficiency (LEP), minority or socioeconomic status, or disability. This Plan has been developed to identify the strategic approach, goals, and guiding principles KCAPTA has established to foster public participation. The Plan also defines how KCAPTA incorporates these standards into its transportation decision making processes by identifying the techniques to use to help increase public participation rates, particularly among those individuals and populations that are often overlooked or underrepresented.

Because each transportation decision is unique and might affect populations and individuals within KCAPTA's service area differently, the techniques used during the public participation process may vary according to each circumstance and should be viewed as a "toolbox" of options, not rigid obligations, chosen with the goal of most effectively reaching out to KCAPTA's diverse communities. KCAPTA has also established baseline methods for its public outreach to ensure that every effort is made to achieve the standards it has set.

It is important to note that KCAPTA is required to implement and comply with specific policies for public engagement, such as Disadvantaged Business Enterprise goal-setting, that may require a departure from this Plan, but that are legitimate and reasonable. Additionally, this Public Participation Plan is a living document, which may evolve according to the demographic makeup of our communities and their unique needs, as well as KCAPTA's evaluation of its public participation effectiveness.

Profile

Kings County Area Public Transit Agency (KCAPTA) began operating the KART Transit System in June of 1980 as a Joint Powers Agency comprised of the County of Kings and the Cities of Hanford, Lemoore, and Avenal. KCAPTA is governed by a five-member Board of Directors (the Board), two of which are appointed from Kings County Board of Supervisors, one appointed from the City of Hanford, one appointed from the City of Lemoore, and one appointed from the City of Avenal.

KCAPTA currently employs 6 individuals. The coach operators, maintenance staff and dispatch staff is provided under contract with MV Transportation.

KCAPTA's Service Area Boundaries

KCAPTA provides public transportation to an approximate 201 square miles of Kings County. Although KCAPTA provides service connections to neighboring counties, its official jurisdictional boundary is confined to the 3 cities and unincorporated areas of Kings County. For the purposes of this LAP, population and other statistical data used to determine limited English proficiency has been limited to its official jurisdictional boundaries.

2. KCAPTA'S STAKEHOLDERS

KCAPTA considers all who reside, work, and travel within Kings County to be stakeholders of the Agency. Communication with the public is a multi-faceted effort of information sharing regarding changes, reductions, or loss of public transit services; fare increases; service planning and construction projects; environmental studies and other plans and projects. A vital component of this communication effort is to evaluate comments, request, and suggestions from the public and to integrate them, as appropriate and when feasible, into KCAPTA's projects and service-related decisions.

The American Community Survey (ACS) data estimates Kings County's population of 150,183 to be 55.3% Male and 44.7% Female, with a median age of 31.5 (Table 1). Kings County's population is 53.8% Hispanic or Latino, 33.1% White, and Black or African American 5.9% (Table 2).

Table 1: Kings County Population Estimates by Sex and Age

Subject		Kings County 2013-2017
Sex/Age		
Total Population 150,183		
Male		55.3%
Female		44.7%
Median Age 31.5		
18 years and over		72.6%
Male		56.9%
Female		43.1%
21 years and over		66.1%
62 years and over		11.6%
65 years and over		9.5%
Male		46.1%
Female		53.9%

Table 2: Kings County Population Estimates by Race and Ethnicity

Subject		Kings County 2013-2017
Race/Ethnicity		
Total Population 150,183		
Hispanic or Latino (of any race)		53.8%
White		33.1%
Black or African American alone		5.9%
American Indian and Alaska Native		.8%
Asian alone		3.6%
Native Hawaiian or Other Pacific Islander		.2%
Some other race		.1%
Two or more races		2.5%

USDOT has adopted the Department of Justice's (DOJ) Safe Harbor Provision, which stipulates that if a recipient of federal funds provides written translation of vital documents for each eligible LEP language group that constitutes

five percent (5%) or 1,000 persons, whichever is less, the total population of persons eligible to be serviced or likely to be affected or encountered, such action will be considered strong evidence of compliance with the recipient's written translation obligations.

KCAPTA has identified only one LEP population's who meet this threshold and for whom written translation of vital documents is provided in the following language: Spanish.

KCAPTA's stakeholders are, in general, the public-at-large of Kings County, although they can be identified as a broad range of individuals, legislative bodies, social service agencies, and community-based organizations that provide vital links between KCAPTA and its customers, such as:

- Transit customers
- Individuals or groups who are affected by a transit-related project or action
- Residents located within affected geographic areas
- Businesses located within affected geographic areas
- Traditionally under-served and/or under-represented communities or populations
 - Persons with limited English proficiency (LEP)
 - Minorities
 - Persons with disabilities
 - Seniors
 - Veterans
 - Low income communities
- Government agencies and municipalities
- Social service agencies and nonprofits
- Schools and colleges

KCAPTA values the partnership it has established with social service agencies that provide vital links between KCAPTA and its customers. Information sharing is a vital component of public outreach and KCAPTA will continue to preserve and increase its partnerships within our communities.

3. KCAPTA'S STRATEGIC APPROACH TO PUBLIC PARTICIPATION

KCAPTA defines public participation as the process through which stakeholders' concerns, needs and values are incorporated into the public transit decision-making process. Public outreach refers to the efforts made to enable stakeholders to affect and influence decision-making processes related to the delivery of public transportation services such as changes, reductions, or loss of public transit services; fare increases; service planning and construction projects; environmental studies and other plans and projects.

KCAPTA understands that including the public in service planning and project development can be challenging. A great deal of time and effort is required to plan and implement successful outreach efforts; the public may believe that decisions are already "made" and their input will not be considered, while others might have difficulty speaking in public or finding the time to participate. The U.S. Department of Transportation and Federal Transportation Administration has published "Public Involvement Techniques for Transportation Decision-making" to assist transportation entities in identifying myriad tools and techniques to design a public participation effort. KCAPTA has integrated many of these recommendations, as well as other best practices found to promote effective public participation and collaborative decision-making, into the Public Participation Plan.

KCAPTA has established goals and guiding principles for its public outreach efforts which provide a foundation on which KCAPTA can identify the appropriate outreach techniques to improve the public participation process. The ultimate goal of KCAPTA's strategic approach is to increase information sharing, encourage public participation, initiate public input, and integrate the priorities of KCAPTA's customers and stakeholders into its transit-related decision.

Because each transportation decision is unique and might affect populations and individuals within KCAPTA's service area to varying degree, the techniques used during the public participation process may vary according to each circumstance.

KCAPTA's Public Participation Goals

KCAPTA strives to ensure that its public participation efforts are early, continuous, and meaningful. The following public participation goals have been established to meet federal requirements for public participation and increase KCAPTA outreach success:

Implement Consistent Communication

KCAPTA is committed to providing its stakeholders with enough time to participate in the decision-making process to help improve overall participation rates and customer satisfaction.

Increase Diversity

KCAPTA understands that effective and legitimate public participation involves all stakeholders regardless of their race or ethnicity, language, socioeconomic status, or disability. Stakeholders who cannot or who find it difficult to participate because of accessibility issues or language barriers, will be considered and accommodated to the extent possible in all outreach efforts.

Make Public Participation Accessible

KCAPTA will make every effort to ensure public participation opportunities are accessible to persons with disabilities.

Maintain and Identify New Partnerships

KCAPTA values the partnerships it has established with social service agencies that provide vital links between KCAPTA and its customers. Information sharing is a vital component of public outreach and KCAPTA will continue to preserve and increase its partnerships within our communities.

Provide Relevant Information

Public participation is most effective when the information provided is relevant to the specific concerns, interests, and values of affected communities and stakeholders. Information provided to the public should be stated accurately and with an appropriate level of technical detail to be understood by the greatest number of participants.

Clearly Define Potential for Influence

KCAPTA will clearly identify how and to what degree the public's input will be able to influence and have a direct impact on the Agency's decision making. The public will also be clearly informed regarding issues such as budgetary constraints, staffing limitations, or other barriers that may limit KCAPTA's ability to implement certain requests.

Integrate Public Input Into the Decision Making Process

Public comments received by KCAPTA are valued. KCAPTA will record, analyze, and integrate public input to the extent it is relevant, constructive, financially and administratively possible and would result in improved plans, projects, programs, and decisions.

KCAPTA's Public Participation Guiding Principles

To assist KCAPTA in achieving its public participation goals, the following guiding principles have been identified to assist KCAPTA staff when planning for changes, reductions, or loss of public transit services; fare increases; service planning and construction projects; environmental studies and other plans and projects. These guiding principles create a "communication loop" of early, continuous, and meaningful public participation.

1. Identify: impacted stakeholders, outreach methods, meeting locations/frequency, outreach timeline

2. Notify: stakeholders of issues under consideration, participation opportunities, resource availability
3. Provide: relevant information and materials and potential for influence
4. Evaluate: all public input against financial, regulatory, or administrative constraints
5. Integrate: public input into the final transportation decision, as appropriate
6. Inform: stakeholders of evaluation and integration process and why final decisions were made

KCAPTA Public Participation Techniques

A one-size-fits-all approach to public outreach does not result in high participation rates; therefore, KCAPTA has identified a range of techniques to be considered at the beginning of its public participation process. Because each transportation decision is unique and might affect populations and individuals within KCAPTA's service area differently, the techniques used during the public participation process may vary according to each circumstance and should be viewed as a "toolbox" of options, not rigid obligations.

Each stage of KCAPTA's communication loop provides an opportunity to identify techniques that are best suited to the nature and scope of the issue under consideration in order to increase the success of the public participation process and result in better outcomes. This process is designed to be used for all of KCAPTA's outreach efforts including changes, reductions, or loss of public transit services; fare increases; service planning and construction projects; environmental studies and other plans and projects.

Each phase of the communication loop is specifically addressed below along with a variety of techniques that may be used to improve the process.

1. Identify

The first phase of KCAPTA's communication loop includes identifying impacted stakeholders, preferable outreach methods, meeting locations/frequency, and creating the overall outreach timeline.

Certain demographic groups may be more impacted than others by a transportation policy or project; therefore, the following stakeholders should be identified during this phase:

- Transit customers
- Individuals or groups who are affected by a transit-related project or action
- Residents located within affected geographic areas
- Business located within affected geographic areas
- Traditionally under-served and/or under-represented communities or populations
 - Persons with limited English proficiency (LEP)
 - Minorities
 - Persons with disabilities
 - Seniors
 - Veterans
 - Low income communities
- Government agencies and municipalities
- Community organizations
- Social service agencies and nonprofits
- Schools and colleges

Techniques

KCAPTA staff may use a variety of techniques to identify impacted stakeholders, preferable outreach methods, determine meeting location frequency, and create the overall outreach timeline, such as:

- Review and analyze demographic maps, transit routes, etc.
- Solicit input from advisory committees and other groups who represent or serve underserved populations
- Create a database of meeting locations that are transit-convenient, ADA accessible, located within impacted communities, and familiar to impacted stakeholders
- Use Gantt charts or other project management tools to establish an outreach timeline
- Schedule meetings at locations and frequencies that are convenient and transit-accessible for minority and LEP communities
- Consider different meeting sizes and formats. Examples include:
 - Board meetings, public hearings
 - Community meetings, drop-in centers
 - Focus groups
 - Open houses, workshops
 - Information booths
- Determine the need for language translation or interpretation

2. Notify

The second phase of KCAPTA's communication loop includes notifying stakeholders of issues under consideration, participation opportunities, and resources availability.

Whether the goal is to reach a broad segment of KCAPTA's stakeholders or to reach a more targeted demographic, identifying the most effective notification methods for each demographic can improve public participation.

Techniques

KCAPTA staff may use a variety of techniques to notify stakeholders of the issues under consideration, the participation opportunities available to them, and how and where they can access resources such as:

- Create a database of media outlets and other non-traditional opportunities to notice public meetings, including those that target impacted stakeholders. Examples include:
 - Traditional media (print)
 - Social media (Facebook, Twitter)
 - Other publications that service minority and LEP populations
 - Schools, libraries, or other locations frequented by impacted stakeholders
 - Online public participation platforms
 - KCAPTA website
- Use alternative distribution formats to notice public meeting. Examples include:
 - Brochures, flyers
 - Direct mailers
 - Email list
 - Press releases
 - Social media (Facebook, Twitter)
 - KCAPTA website
 - Advisory committees and groups who represent or service underserved populations
- Provide opportunities for public comment other than attending meetings and clearly advertise the opportunities. Examples include:
 - Written
 - Email
 - Phone submission
 - Surveys
 - Social media

- Website

3. Provide

The third phase of the communication loop involves providing the public with relevant information and materials and informing them of their potential for influence.

KCAPTA has determined that public participation is most effective when the public is provided information that is relevant to the specific concerns, interests, and values of affected communities and stakeholders and when they have multiple opportunities to receive information and provide input.

Information provided to the public should be stated accurately and with an appropriate level of technical detail so it can be understood by the greatest number of participants. Additionally, KCAPTA will clearly identify how, and what degree, the public's input will be able to influence and have a direct impact on the Agency's decisions. The public will also be clearly informed regarding issues such as budgetary constraints, staffing limitations, or other barriers that may limit KCAPTA's ability to implement certain requests.

Techniques

KCAPTA staff may use a variety of techniques to ensure informational materials are relevant and that the public understands their potential for influence. Examples include:

- Clearly summarize project or policy
- Provide specific project or policy options and clearly identify options that are not available due to financial, administrative, technical, or other reasons
- Avoid technical jargon and complexity
- Use summarized fact sheets to convey project or policy highlights
- Utilize images, photos, diagrams wherever possible
- Provide appropriate language translation of materials for LEP individuals
- Provide appropriate interpretation for LEP individuals
- PowerPoint presentations (emphasize bullet points and diagrams instead of lengthy paragraphs)
- Design surveys to offer specific and feasible project or policy preferences and avoid "open-ended input"
- Consider having meeting facilitated by a neutral party

4. Evaluate

The fourth phase of the communication loop includes evaluating all public input against financial, regulatory, and administrative constraints.

KCAPTA operates within a regulatory environment that may at times preclude certain requests from being implemented: additionally, there may be technical, budgetary, or other barriers that may limit KCAPTA's ability to implement certain requests. For this reason, the evaluation phase of the public participation process most often will be conducted by KCAPTA staff and/or consultants.

The goal of the public outreach effort is to ensure positive outcomes, better solutions, and a transit system that acknowledges the concerns, needs and values of its stakeholders. For this reason public input is evaluated for integration into the final project or decisions to the extent it is relevant, constructive, financially and administratively feasible.

Techniques

Following closure of the public comment period, KCAPTA staff will categorize and summarize all public input in formats conducive to staff review and evaluation, such as:

- Minutes of all public meetings
- List
- Tables
- Spreadsheets

KCAPTA staff and/or consultants will evaluate public input for integration into its final project or decision by analyzing the following dimensions:

- Administrative feasibility (staffing and labor availability)
- Ethical conformity (negative impacts on minorities, low income, or underserved populations)
- Financial feasibility (budget/funding availability)
- Project effectiveness (improve outcomes and efficiencies)
- Technical feasibility (technological/capacity/resource limitations/public safety)

KCAPTA staff and/or consultants may use the following techniques during their analysis:

- SWOT analysis (strengths, weaknesses, opportunities, and threats of proposed options)
- FOOD analysis (facts, outcomes, options, decision)
- Mapping, planning, and scheduling comparisons (efficiency/effectiveness of proposed options)
- Resources availability analysis (staff/labor, technological/capacity limitations)
- Budget analysis (cost/benefit analysis, budget/funding limitations)
- Legal review (regulatory requirements, equity and civil rights violations, industry best practices)

5. Integrate

The fifth phase of the communication loop involves integrating public input into the final transportation project or decision.

Following the evaluation phase, KCAPTA staff will integrate into the final project or decision the recommendations that have been found to result in positive outcomes, better solutions, and a transit system that acknowledges the concerns, needs, and values of its stakeholders.

Techniques

Examples of techniques to integrate changes and revisions in a manner that preserves the public record and prepares KCAPTA to inform the public of the influence their input resulted in include:

- Revise draft plans, programs, and policies for final approval by the KCAPTA Board of Directors
- Record all public comments received from relevant sources
 - Minutes of all public meetings
 - Written, email, or phone submissions
 - Surveys
 - Comments received from social media
 - Comments received on KCAPTA website
- Describe the mechanism(s) used to evaluate/analyze public comments
 - SWOT analysis
 - FOOD analysis
 - Mapping, planning, and scheduling comparisons
 - Resource availability analysis
 - Budget analysis
 - Legal review
- Include the reasons for accepting or rejecting public comments
 - Administrative feasibility
 - Ethical conformity
 - Financial feasibility
 - Project effectiveness
 - Technical feasibility

6. Inform

The sixth and final phase of the communication loop involves informing stakeholders of the evaluation and integration process and why final decisions were made.

To ensure transparency and complete the communication loop, KCAPTA has developed methods to inform the public of suggestions and requests that were or were not able to be included into the final project or decision, as well as a summary of why these determinations were made. Examples include:

- Include all public comments received:
 - In the appendix of the final plan/project
 - In staff memos presented to the KCAPTA Board
- Include the mechanism for evaluating/analyzing public comments:
 - In the appendix of the final plan/project
 - In staff memos presented to the KCAPTA Board
- Include the reasons for accepting or rejecting public comments:
 - In the appendix of the final plan/project
 - In staff memos presented to the KCAPTA Board

4. KCAPTA'S BASELINE METHODS FOR PUBLIC OUTREACH

KCAPTA has established baseline methods for public outreach to comply with DOT, FTA, and title VI requirements and to ensure a process through which stakeholders' concerns, needs, and values are incorporated into the public transit decision-making process.

While this Plan is designed to assist KCAPTA staff in implementing a range of outreach techniques to increase public participation, a baseline of participation methods has been established do not ensure KCAPTA meets the basic requirements for public participation. All public outreach efforts incorporated the requirements of KCAPTA's Language Assistance Plan to ensure meaningful access to persons with limited English proficiency.

The following baseline public participation methods are provided by KCAPTA:

Monthly Board Meetings

The KCAPTA Board of Directors holds monthly public meetings. A public comment period is provided at every board meeting, allowing stakeholders the opportunity to comment on any issue of concern, whether on or not on the agenda.

- All board meetings are noticed at least 72 hours in advance on KCAPTA's website www.kartbus.org, at meeting location, and at the Administrative Office.
- Agendas are available to the public at least 72 hours in advance of board meetings on KCAPTA's website www.kartbus.org, at meeting locations, and at the Administrative Office.
- Accessible formats and language translation or interpretation is provided with advance notice, and instructions on obtaining these services are provided on every agenda.

Public Hearings

In accordance with 49 USC Chapter 53, Section 5307, recipients of federal grants must have a locally developed process to solicit and consider public comments before implementing a major reductions in service or an increase in bus fares. The Agency's Public Hearing Policy can be found in **Appendix A**.

Transit Service and Fares

KCAPTA conducts public hearing for major service changes or any increase in its fare structure.

- KCAPTA will hold one or more public hearings, depending on the nature of the service change or fare increase and the impacted population(s).
- At least two weeks notice will be provided for public hearings, and information on submitting written, email, verbal, or telephone comments is provided for those unable to physically attend the hearings.
- Public hearings will be noticed in both English and Spanish and will include KCAPTA's Safe Harbor notice of language service in English and Spanish.
- Public hearings will be advertised in local newspapers of record with broad distribution, as well as a targeted distribution to relevant language groups and affected communities, as appropriate.
- Public hearings will be advertised onboard KCAPTA buses and on the KCAPTA website www.kartbus.org during the two-week notice period.
- Bilingual (English/Spanish) Staff will be present at every public hearing.
- Accessible formats and language translation or interpretation will be provided with advance notice, and instruction on obtaining these services will be provided on every public notice.
- All public hearing presentation materials will be provided in English and Spanish.

Community Outreach

Stakeholder Surveys

KCAPTA conducts surveys in both English and Spanish to gauge the opinions of its customers and the community at large. These surveys allow KCAPTA to identify program strength and weakness while developing strategies for enhancing services, thereby improving mobility for all within KCAPTA's service area. Service planning and marketing decisions require a solid foundation of quality, current data regarding travel patterns, customer perceptions, the customer profile, and demand for public transit service.

Community Meetings

On occasion, KCAPTA staff conducts public educational/informational meetings on a variety of topics of interest to the general public. These meetings may also be used to supplement the public hearings process for projects that could benefit from additional outreach opportunities. Potential meeting formats may include, but are not limited to:

- Drop-in centers
- Focus groups
- Open houses
- Workshops
- Presentations at senior centers community organizations, etc.

In an attempt to maximize participation by the public, a variety of methods are utilized, including:

- Information booth at Transit Station
- Handing out Notices in English and Spanish on the bus and at the Transit Station.

KCAPTA Travel Trainers

KCAPTA Travel Trainers provide free fixed-route training to teach interested individuals how to safely and independently ride the KCAPTA bus system. KCAPTA offers this training to individuals or small groups. Training is tailored to the individuals/group's needs.

Paratransit Outreach

KCAPTA is committed to assisting persons with disabilities or other travel challenges to ensure that they receive the same level of mobility and travel independence on public transit that other customers enjoy.

In compliance with the Americans with Disabilities Act of 1990, KCAPTA offers ADA paratransit program to customers who have a disability that prevents them from using KCAPTA's regular fixed-route bus service. This service is a shared-ride program and its buses are fully accessible and equip with wheelchair lifts.

Public Notices

Notice will be mailed to our Paratransit Clients regarding Major Services Changes or Fare Increases that have a direct impact to our Paratransit Service. These notices will be sent in both English and Spanish.

Stakeholder Surveys

Occasionally, KCAPTA will conduct surveys via mail in both English and Spanish to gauge the opinions of our paratransit customers. These surveys allow KCAPTA to identify program strengths and weaknesses while developing strategies for enhancing services, thereby improving mobility for all within KCAPTA's service area. Service planning and marketing decisions require a solid foundation of quality, current data regarding travel patterns, customer perceptions, the customer profile, and demand for public transit service.

Routine Public Information

Social Media

KCAPTA uses several social media formats to keep its customers informed of issues such as holiday schedules, route detours, and other alerts. KCAPTA currently uses the following social media platforms:

- Facebook
- Twitter
- Instagram
- Snapchat

Printed Materials

KCAPTA provides a wide range of printed materials to educate, inform and promote its transit services to the public. Examples of KCAPTA's printed materials include:

- KART Riders Guide
- ADA Paratransit Guide

Website

KCAPTA maintains a website www.kartbus.org to provide a wealth of valuable information and is equipped with Google Translate to provide language translation in over 100 languages. Information included in the website includes, but not limited to the following:

- Complete Rider's Guide
- Trip Planner
- Route and Schedules
- Fares
- Real Time Bus Arrival Information

5. OUTREACH EFFORTS OVER PAST THREE YEARS

The following public hearings, scoping meetings, and request for public comment took place over the last three years (July 2016- April 2019).

- In 2017, KCAPTA held two public hearings to receive testimony concerning any unmet transit needs that may exist within our service area.

- On January 25, 2017, KCAPTA held a public hearing proposing fare structure revisions. The public comment period continued until after the second public hearing was held on February 22, 2017 when the public comment period was closed.
- On January 25, 2017, KCAPTA held a public hearing proposing various route modifications. The public comment period continued until after the second public hearing was held on February 22, 2017 when the public comment period was closed
- In 2018, KCAPTA held two public hearings to receive testimony concerning any unmet transit needs that may exist within our service area
- On February 28, 2018, KCAPTA held a public hearing proposing service hour reductions. The public comment period continued until after the second public hearing was held on March 28, 2018 when the public comment period was closed.
- On February 28, 2018, KCAPTA held a public hearing proposing route modification. The public comment period continued until after the second public hearing was held on March 28, 2018 when the public comment period was closed.
- On July 25, 2018, KCAPTA published a public notice soliciting public comments on its proposed Disadvantage Business Enterprise Goal for Federal Fiscal Years 2019-2021.
- In 2019, KCAPTA held two public hearings to receive testimony concerning any unmet transit needs that may exist within our service area.
- On March 27 2019, April 17, 2019 and on May 22, 2019, KCAPTA held a public hearing proposing route modifications and service changes.
- In 2018, KCAPTA held three scoping meetings in the City of Avenal to discuss the transportation needs of the community.

The following community events and presentations were attended by KCAPTA staff:

DATE:	EVENT:	SPONSOR/HELD BY:
2/25/2016	WITNESS TO FITNESS FOR SENIORS	SENIOR CENTER LEMOORE
3/16/2016	SAY NO TO SMOKING	KC HEALTH DEPT
4/16/2016	KIDS DAY!	HANFORD MALL
4/16/2016	WEEK OF THE YOUNG CHILD	CITY OF AVENAL/RICE PARK
4/21/2016	JOB/RESOURCE FAIR	WEST HILLS COLLEGE LEMOORE
4/26/2016	SSTAC MEETING	KCAG
4/28/2016	5th ANNUAL LEMOORE FAM. HEALTHFAIR	KCOED/KC FIRST 5
5/12/2016	KINGS VIEW OAK WELLNESS PRESENTATION ON KART	KCAPTA STAFF
5/14/2016	FHCN HEALTH FAIR	FHCN
5/14/2016	KINGS COUNTY HOMECOMING	CHAMBER OF COMMERCE
5/25/2016	5TH ANNUAL NATIONAL SENIOR HEALTH DAY	LEMOORE REC
6/1/2016	SSTAC MEETING	KCAG
6/8/2016	KART RIBBON CUTTING RT. 30/31 LEMOORE	KART
6/10/2016	FRIENDSHIP DAY	KCCOA
6/16/2016	ADVENTIST HEALTH LEMOORE PRESENTATION	KART
7/6/2016	OPEN HOUSE/CELEBRATE 70 YEARS	KC DEPT OF PUBLIC HEALTH
7/7/2016	VIEW ROAD APTS PRESENTATION	KCAPTA STAFF
7/15/2016	INFORMATION BOOTH LEMOORE	KCAPTA STAFF
7/28/2016	LEMOORE HIGH SCHOOL	STUDENT ORIENTATION
8/1/16 TO 8/2/16	HANFORD WEST HIGH SCHOOL	STUDENT ORIENTATION
8/2/2016	NATIONAL NIGHT OUT	CITY OF HANFORD
8/3/16 TO 8/4/16	HANFORD HIGH SCHOOL	STUDENT ORIENTATION
8/3/2016	SIERRA PACIFIC HIGH SCHOOL	STUDENT ORIENTATION
9/8/2016	CINNAMON VILLA SENIOR BUS TOUR	KCAPTA STAFF

9/16/2016	PICNIC IN PARK FOR SENIORS	COMMISSION ON AGING
9/21/2016	PRESENTATION @ KCAO AVENAL	KCAPTA STAFF
10/5/2016	STRATFORD ENERGY EVENT	KC PUBLIC WORKS
10/28/2016	KART RIDERS APPRECIATION DAY	KCAPTA STAFF
10/29/2016	RED RIBBON CELEBRATION (LEMOORE)	LIONS PARK
11/14/16 TO 11/18/16	KINGS COUNTY WELFARE TO WORK PATHWAY PROGRAM	KCAPTA STAFF
1/18/2017	INFORMATION BOOTH AT BUS TERMINAL	KCAPTA STAFF
1/19/2017	INFORMATION BOOTH WHC	KCAPTA STAFF
1/20/2017	KCAO CORCORAN	KCAPTA STAFF
1/20/2017	KCAO GENERATIONS LEMOORE	KCAPTA STAFF
1/31/2017	SSTAC MEETING	KCAPTA STAFF
3/30/2017	HANFORD HIGH WALK THROUGH	HANFORD HIGH
4/19/2017	PRESENTATION AT ETS	KCAPTA STAFF
4/24/2017	EAGLE DAYS @ WHC	WHC
5/10/2017	SENIOR HEALTH FAIR	USDA/ KCCOA /IHSS
5/12/2017	SENIOR EVENT @ MOONEY GROVE	COMMISSION ON AGING
5/31/2017	SENIOR HEALTH & FITNESS	LEMOORE REC
6/2/2017	SSTAC MEETING	KCAG
6/27/2017	BRIGHT BEGINNINGS	BRIGHT BEGINNINGS
7/31/17 TO 8/1/17	HANFORD WEST ORIENTATION	HANFORD WEST HIGH SCHOOL
7/31/17 TO 8/1/17	LEMOORE HIGH SCHOOL ORIENTATION	LEMOORE HIGH SCHOOL
8/3/2017	KINGS COUNTY MEET & GREET EVENT	KINGS COUNTY OFFICE OF EDUCATION(LEMOORE)
8/7/2017	"BACK TO SCHOOL" GOSPEL SKATE PARTY	PHILADELPHIA OUTREACH MINISTRIES
8/16/2017	WEST HILLS COLLEGE WELCOME BACK BBQ	WEST HILLS COLLEGE LEMOORE
9/15/2017	BURRIS PARK SENIORS	COMMISSION ON AGING
9/15/2017	HANFORD HIGH SCHOOL PRESENTATION TO STUDENTS	KCAPTA STAFF
9/18/2017	CINNAMON VILLAS PRESENTATION	KCAPTA STAFF
9/30/2017	DAY OF THE FAMILY	CITY OF AVENAL/CHP/FAST/COMM FOOD BANK
10/5/2017	KINGS COUNTY PUBLIC SAFETY EVENT (STRATFORD COMMUNITY PARK)	KCBH.ORG/KC LIBRARY/KART/MID VALLEY DISPOSAL
10/28/2017	RED RIBBON CELEBRATION (LEMOORE)	RED RIBBON WEEK
4/25/2017	HEALTH AND COMMUNITY FAIR	ROSA PARKS LEARNING CENTER
5/10/2017	KCAO AND KCAPTA AND CHAMPION COLLABORATIVE EFFORT	KCOA/KCAPTA/CHAMPION COLLABORATIVE EFFORT
5/30/2017	25TH ANNIVERSARY SENIOR HEALTH AND FITNESS DAY	CITY OF LEMOORE
6/6/2017	KINGS COUNTY CCS TRANSITION PLANNING FAIR 2018	KINGS COUNTY HEALTH DEPT. PUBLIC HEALTH
10/11/2017	KINGS COUNTY PUBLIC SAFETY EVENT (KETTLEMAN CITY PAK)	WM/KART/ KC DEPT OF HEALTH/KCBH.ORG
10/19/2017	PUBLIC SAFETY EVENT KETTLEMAN CITY	KC PUBLIC WORKS
10/20/2017	RIDERS APPRECIATION DAY	KCAPTA STAFF
11/14/2017	AVENAL HIGH SCHOOL PRESENTATION	KCAPTA STAFF
11/17/2017	LEMOORE HIGH SCHOOL PRESENTATION	KCAPTA STAFF
12/5/2017	KARELINK BOOTH FOR KC	KC
12/18/2017	KART HOLIDAY OPEN HOUSE ADMIN OFFICE	KCAPTA STAFF
1/26/2018	SSTAC MEETING	KCAG
3/1/2018	VALLEY CHRISTIAN PRESENTATION TO HOME RESIDENTS	KCAPTA STAFF
3/15/2018	VALLEY CHRISTIAN PRESENTATION TO HOME RESIDENTS	KCAPTA STAFF
3/19/2018	OUTREACH WHC FOOD BANK ON KART	KCAPTA STAFF
4/25/2018	ROSA PARKS HEALTH & COMMUNITY FAIR	KCAO
5/23/2018	KART BOOTH @ KC HUMAN SERVICES OPEN HOUSE	KC HUMAN SERVICES
5/26/2018	NAS OPS SIDE KART INFO BOOTH	KCAPTA STAFF
5/27/2018	NAS OPS SIDE KART INFO BOOTH	KCAPTA STAFF
5/30/2018	SENIOR HEALTH & FITNESS	LEMOORE REC
8/10/2018	SIERRA PACIFIC HIGH SCHOOL	HIGH SCHOOL
9/19/2018	WHC OUTREACH BOOTH	WHC
9/21/2018	SENIOR DAY IN BURRIS PARK	COMMISSION ON AGING
9/24/2018	WHC OUTREACH BOOTH	WHC

9/25/2018	NAS OPS SIDE KART INFO BOOTH	KCAPTA STAFF
10/11/2018	PUBLIC SAFETY EVENT KETTLEMAN CITY	KC PUBLIC WORKS
10/31/2018	KART RIDER APPRECIATION DAY (OUTREACH/EVENT) @ TERMINAL	KCAPTA STAFF
12/5/2018	COUNTY OF KINGS CALIFORNIA OPEN HOUSE (KARELink)	CHAMPIONS/KARELink/ KINGS COUNTY
12/14/2018	OUTREACH AT GENERATIONS	KCAO
3/28/2019	INFORMATION BOOTH AT BUS TERMINAL	KCAPTA STAFF
3/29/2019	INFORMATION BOOTH AT BUS TERMINAL	KCAPTA STAFF

6. CONCLUSION

This Public Participation Plan must, first and foremost, be accountable to the public. The strategic approach, goals, and guiding principles KCAPTA has established are intended to foster public participation by providing early, continuous, and meaningful public engagement processes for its stakeholders regardless of race, color, or national origin, including populations and individuals who may be underserved because of limited English proficiency (LEP), minority or socioeconomic status, or disability. The methods and techniques employed by KCAPTA help increase public participation rates, particularly among those individuals and populations that are often overlooked or underrepresented.

The Plan has also been prepared to guide and support KCAPTA staff in complying with 49 U.S.C Sections 5307(b), and 5307 (c) (1)(1), USDOT requirements including the FTA Circular 4702.1B and Circular 4703.1, and Title VI of the Civil Rights Act of 1964. Compliance with these regulations and guidelines ensures that Kings County Area Public Transit Agency (KCAPTA) provides an opportunity for inclusive and accessible public engagement in its transportation decision-making process.

While the methods and techniques used during the public participation process may vary according to each circumstance, KCAPTA will make every effort to achieve the standards it has to set and design public outreach effort's with the goal of most effectively reaching out to the diverse population throughout KCAPTA's service area. As a living document, the Plan may evolve according to the demographic makeup of KCAPTA communities and their unique needs, as well as KCAPTA's evaluation of its public participation effectiveness.

Appendix A: KCAPTA Public Hearing Policy

Objective:

To establish a locally developed process for soliciting and considering public comments for major service changes and fare increases.

Definition of Public Hearing Requirements:

In accordance with 49 USC Chapter 53, Federal Transit Laws, Section 5307, a grantee must have a locally developed process to solicit and consider public comment before raising a fare or carrying out a major reduction in service. The regulation does not require that fare decreases, service increases, or “special fares” be preceded by public comment. The grantee is not required to hold a public meeting, but must offer an opportunity for one. The grantee must establish guidelines or thresholds for what is considered a “major” change to be.

Threshold for Public Hearing Requirements:

The KCAPTA Board defines a major change as one that results in a 25% or greater decrease in vehicle service hours, changes in routing that result in KCAPTA vehicles utilizing new public streets and/or corridors not previously used by any route (excluding major arterial and collector streets, streets designated as a truck route, or a State-owned roadway), or any increase in fare structure. Changes not meeting this threshold do not require a public comment process.

Exceptions to the Public Hearing Requirements:

- a. A reassignment of route numbers resulting from combining existing routes, which results in the creation of a new route “number”.
- b. Standard seasonal variations, unless the variation, as compared to operations during the previous season, falls within the definitions of major adjustments of transit service listed above.
- c. Emergency service changes, including changes in routes or service frequencies which may be necessitated due to a disaster which severely impairs public health or safety, changes in access to public streets, or the ability of the Agency equipment to travel on public streets.
- d. The introduction or discontinuance of short-term or temporary service which will be/has been funded primarily through grants or third party contracts.
- e. Changes to service on a route with fewer than ten total trips in a typical service day.

Public Hearing Guidelines:

1. The Executive Director, Transit Manager or the KCAPTA Board of Directors will authorize the holding of a public hearing(s).
2. At least two weeks notice to the public shall be given prior to each hearing.
3. The public shall be invited to submit written, email, or verbal comments if they cannot attend the hearing.
4. Publicity for the hearing and written comments shall at a minimum include:
 - Advertisements in the Hanford Sentinel in both English and Spanish
 - Notice Posted on all Social Media in both English and Spanish
 - Notice Posted on the Buses in both English and Spanish
 - Notice Posted in the Information Area and at the Administrative Offices in both English and Spanish.

Consideration of Public Comments:

1. KCAPTA shall provide the Board of Directors with all comments submitted by the public.
2. The Board will consider all comments submitted during the public hearing process.
3. The Clerk to the Board shall document each speaker’s name and a brief summary of their comments.
4. The Board will take no final action until the public’s written and oral comments have been presented at the final public hearing.

ATTACHMENT F
Language Assistance Plan



KINGS COUNTY AREA PUBLIC TRANSIT AGENCY

LANGUAGE ASSISTANCE PLAN

Effective: June 2019 – June 2022

Kings County Area Public Transit Agency
610 W 7th Street
Hanford Ca 93230

Title VI Contact: Angie Dow, Executive Director
angie.dow@co.kings.ca.us
(559) 852-2691

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1. EXECUTIVE SUMMARY

Title VI of the Civil Rights Act of 1964, 49 U.S.C 2000d et seq., and its implementing regulations provide 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 otherwise be subjected to discrimination under any program or activity that receives federal financial assistance.

In compliance with the Title VI regulations, including U.S. Department of Justice (DOJ) 28 CFR § 42.401 et seq., and 28 CFR § 50.3; U.S. Department of Transportation (DOT) 49 CFR part 21; and Executive Order 13166 “Improving Access to Services for Persons with Limited English Proficiency” (2000), Kings County Area Public Transit Agency (KCAPTA) has developed this Language Assistance Plan (LAP) Per guidance found in FTA Circular 4702.1B and DOT LEP Guidance 70 FR 74087, December 14, 2005, KCAPTA has taken “reasonable steps to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who have limited-English proficiency.” Title VI regulations define limited English proficient (LEP) individuals as those who speak, read, write or understand English “less than very well.”

KCAPTA supports the goal of Title VI and believes that providing language assistance will have a positive impact on Kings County’s LEP population and its ridership in general. This Language Assistance Plan, effective June 1, 2019 to June 1, 2022, reflects KCAPTA’s compliance with federal Title VI regulations and its continuous efforts to ensure meaning full access to transit services for all persons, regardless of race, color, or national origin.

Using the four-factor analysis prescribed by USDOT, KCAPTA has assessed the language needs within its service area, which includes the Cities of Hanford, Lemoore, Avenal, Kettleman City, Stratford, Corcoran, Laton, and Kings County.

According to USDOT guidance and Circular 4702.1B Chapter III-7 Section 9 (a), the federally-funded recipient’s obligation to accommodate LEP populations is determined by balancing the flowing four factors:

- Factor 1:** the number of proportion of LEP persons eligible to be serviced, or likely to be encountered, by a program, activity, or service
- Factor 2:** the frequency with which LEP individuals come in contact with the program, activity, or service
- Factor 3:** the nature and importance of the program, activity, or service to people’s lives
- Factor 4:** the resources available to the recipient

To address Factor 1, KCAPTA incorporated the most recently available data from the 2011-2015 U.S. Census American Community Survey (ACS) and the California Department of Education (CDE), which identified one (1) LEP language groups within the service area that meet the DOJ’s Safe Harbor threshold of “five percent or 1,000 persons, whichever is less, of the total population of persons eligible to be serviced or likely to be affected or encountered” by KCAPTA. The language identified is Spanish.

To address factors 2 and 3, KCAPTA reviewed employee survey responses and analyzed responses from its most recent 2019 Rider Survey to determine the frequency with which LEP individuals come in contact with it programs, activities, or services, and how important these programs, activities, or services are to their daily lives.

After assessing the first 3 factors, KCAPTA weighted the demand for language assistance against it current financial and personnel resources and developed a language assistance implementation plan that includes the following four elements:

1. Identifying LEP individuals who need language assistance

2. Providing language assistance
3. Training KCAPTA staff
4. Providing notice of LEP customers
5. Monitoring and updating the LEP

The Language Assistance Plan will be a valuable resource to KCAPTA employees who work daily to provide Kings County residents and visitors meaningful access to public transportation and will help ensure these benefits, services, and information are equally shared by those with limited-English proficiency. A copy of all census data used to complete the Four Factor Analysis can be found in **Attachment G**.

2. INTRODUCTION

Kings County Area Public Transit Agency (KCAPTA) operations in Kings County began in June of 1980 as a joint powers agency comprised of the county of Kings and the Cities of Hanford, Lemoore, and Avenal. KCAPTA is governed by a five-member Board of Directors (the Board), two of which are appointed from the King County Board of Supervisors, one appointed from the City of Hanford, one appointed from the City of Lemoore and one appointed from the City of Avenal.

In 2018, KCAPTA's fixed route fleet of 26 buses boarded 709,785 passengers, while the paratransit service carried 14,294 passengers with a fleet of 9 vehicles.

KCAPTA currently employs 6 administrative staff. All other staff is provided under contract with MV Inc.

SERVICE AREA BOUNDARIES

KCAPTA provides public transportation to Kings County. Although KCAPTA provides service connections within neighboring counties, its official jurisdictional boundary is confined to Kings County. For the purposes of this Language Assistance Plan, population and other statistical data used to determine limited English proficiency have been limited to its official jurisdictional boundaries.

SERVICE AREA POPULATION

KCAPTA is accountable to a diverse population of individuals who reside, work, and travel within Kings County. American Community Survey 2013-2017 5-yr data estimates Kings County's population of 150,183 to be 55.3% male and 44.7% female, with a median age of 31.5 (Table 1).

Table 1: Kings County Population Estimates by Sex and Age

Subject	Kings County 2013-2017	
Sex/Age		
	Total Population 150,183	
Male		55.3%
Female		44.7%
	Median Age	31.5
18 years and over		72.6%
Male	56.9%	
Female	43.1%	
21 years and over		66.1%
62 years and over		11.6%
65 years and over		9.5%
Male	46.1%	
Female	53.9%	

Table 2: Kings County Population Estimates by Race and Ethnicity

Subject	Kings County 2013-2017
Race/Ethnicity	
Total Population 150,183	
Hispanic or Latino (of any race)	53.8%
White	33.1%
Black or African American alone	5.9%
American Indian and Alaska Native	.8%
Asian alone	3.6%
Native Hawaiian or Other Pacific Islander	.2%
Some other race	.1%
Two or more races	2.5%

To determine KCAPTA's obligation to accommodate LEP population within its service area, the following FTA recommended four-factor analysis was conducted and is detailed in the following section.

3. FOUR –FACTOR ANALYSIS

The safe Harbor provision of FTA Circular 4702.1B 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, such action will be considered strong evidence of compliance with the recipient’s written translation obligations.”

KCAPTA has identified one (1) LEP population of that constitutes more the 5% and/or 1,000 or more individuals who speak English “less than very well” and for whom notices of language assistance and written translation of vital documents is required: Spanish.

According the USDOT guidance, the federally-funded recipient’s obligation to accommodate LEP population is determined by balancing four factors:

- Factor 1:** the number of proportion of LEP persons eligible to be serviced or likely to be encountered, by a program, activity or service
- Factor 2:** the frequency with which LEP individuals come in contact with the program, activity, or service
- Factor 3:** the nature and importance of the program, activity, or service to people’s lives
- Factor 4:** the resources available to the recipient

Factor 1: Identification of LEP Individuals

“The greater number or proportion of LEP individual from a particular language group served or encountered in the eligible service population, the more likely language services are needed....” (DOT LEP Guidance Section V (1)).

American Community Survey Data (ACS)

For Factor 1, KCAPTA analyzed census data from the ACS 2011-2015 5-year sample to determine the number or proportion of LEP persons eligible to be serviced or likely to be encountered by a program, activity, or service provided by KCAPTA. The ACS census data estimate that of the total population in KCAPTA’s service area aged five years and over who speak a language other the English, 23,385 individuals speak English less than very well. This number represents KCAPTA’s LEP population and is 16.84% of the total KCAPTA service area population of 138,825.

The number of Spanish speaking persons who speak English less than “very well” (21,089) far exceeds the Safe Harbor threshold, which is strong evidence that the translation of documents by KCAPTA is a vital necessary practice.

Table 3: Kings County LEP Estimates for Population 5 Years and Over

	<i>ACS LEP Population (speaks English less than very well)</i>	<i>% of Total Population</i>	<i>% of Total LEP Population</i>
<i>Total Population ACS 2011-2015</i>	<i>138,825</i>	<i>23,385</i>	<i>16.84%</i>
<i>Spanish or Spanish Creole:</i>	<i>21,089</i>	<i>15.19%</i>	<i>90.18%</i>
<i>French</i>	<i>10</i>	<i>0.01%</i>	<i>0.04%</i>
<i>French Creole</i>	<i>0</i>	<i>0.00%</i>	<i>0.00%</i>
<i>Italian</i>	<i>0</i>	<i>0.00%</i>	<i>0.00%</i>
<i>Portuguese or Portuguese Creole</i>	<i>413</i>	<i>0.30%</i>	<i>1.77%</i>
<i>German</i>	<i>25</i>	<i>0.02%</i>	<i>0.11%</i>
<i>Yiddish</i>	<i>0</i>	<i>0.00%</i>	<i>0.00%</i>
<i>Other West Germanic languages</i>	<i>9</i>	<i>0.01%</i>	<i>0.04%</i>
<i>Scandinavian languages</i>	<i>6</i>	<i>0.00%</i>	<i>0.03%</i>
<i>Greek</i>	<i>0</i>	<i>0.00%</i>	<i>0.00%</i>
<i>Russian</i>	<i>37</i>	<i>0.03%</i>	<i>0.16%</i>
<i>Polish</i>	<i>50</i>	<i>0.04%</i>	<i>0.21%</i>
<i>Serbo-Croatian</i>	<i>0</i>	<i>0.00%</i>	<i>0.00%</i>
<i>Other Slavic languages</i>	<i>0</i>	<i>0.00%</i>	<i>0.00%</i>
<i>Armenian</i>	<i>6</i>	<i>0.00%</i>	<i>0.03%</i>
<i>Persian</i>	<i>0</i>	<i>0.00%</i>	<i>0.00%</i>
<i>Gujarati</i>	<i>0</i>	<i>0.00%</i>	<i>0.00%</i>
<i>Hindi</i>	<i>8</i>	<i>0.01%</i>	<i>0.03%</i>
<i>Urdu</i>	<i>12</i>	<i>0.01%</i>	<i>0.05%</i>
<i>Other Indic languages</i>	<i>54</i>	<i>0.04%</i>	<i>0.23%</i>
<i>Other Indo-European languages</i>	<i>9</i>	<i>0.01%</i>	<i>0.04%</i>
<i>Chinese</i>	<i>162</i>	<i>0.12%</i>	<i>0.69%</i>
<i>Japanese</i>	<i>82</i>	<i>0.06%</i>	<i>0.35%</i>
<i>Korean</i>	<i>28</i>	<i>0.02%</i>	<i>0.12%</i>
<i>Mon-Khmer, Cambodian</i>	<i>17</i>	<i>0.01%</i>	<i>0.07%</i>
<i>Hmong</i>	<i>30</i>	<i>0.02%</i>	<i>0.13%</i>
<i>Thai</i>	<i>17</i>	<i>0.01%</i>	<i>0.07%</i>
<i>Laotian</i>	<i>5</i>	<i>0.00%</i>	<i>0.02%</i>
<i>Vietnamese</i>	<i>145</i>	<i>0.10%</i>	<i>0.62%</i>
<i>Other Asian languages</i>	<i>0</i>	<i>0.00%</i>	<i>0.00%</i>
<i>Tagalog</i>	<i>777</i>	<i>0.56%</i>	<i>3.32%</i>
<i>Other Pacific Island languages</i>	<i>46</i>	<i>0.03%</i>	<i>0.20%</i>
<i>Navajo</i>	<i>0</i>	<i>0.00%</i>	<i>0.00%</i>
<i>Other Native North American Languages</i>	<i>0</i>	<i>0.00%</i>	<i>0.00%</i>
<i>Hungarian</i>	<i>36</i>	<i>0.03%</i>	<i>0.15%</i>
<i>Arabic</i>	<i>305</i>	<i>0.22%</i>	<i>1.30%</i>
<i>Hebrew</i>	<i>0</i>	<i>0.00%</i>	<i>0.00%</i>
<i>African languages</i>	<i>7</i>	<i>0.01%</i>	<i>0.03%</i>
<i>Other and unspecified languages</i>	<i>0</i>	<i>0.00%</i>	<i>0.00%</i>

Using ACS data, KCAPTA’s one (1) language groups were identified by their estimated population within each of KCAPTA’s cities (Table 4). This information will assist KCAPTA in identifying concentrations of specific language groups within its service area and providing appropriate language assistance for public hearings, meetings, written materials, and other outreach efforts.

Table 4: KCAPTA LEP Population by City

Geography	Spanish	LEP Percentage
Avenal	3,757	17.81%
Corcoran	3,464	16.43%
Hanford	9,617	45.60%
Lemoore	2,096	9.94%
Stratford	2,155	10.22%
Total Kings County by Cities	21,089	

California Department of Education Data

FTA guidelines recommend that alternate and local sources of data are analyzed when conducting a four-factor analysis. KCAPTA reviewed data from the California Department of Education (CDE) to identify the number of English-learner students enrolled in Kings County's school districts. Of Kings County's total school population, 5,170 are English learners (Table 5)

Table 5: Total Kings County 2018-2019 English Learner Enrollment

Total Kings County School Population	29,569
Total English learner population	5,170 (17.48 % of total school population)
Number of languages reported spoken by English learner population	18

KCAPTA also reviewed the 2018-19 CDE enrollment data which broke down the total number of English learner students by their primary languages (Table 6). This alternate data source supports the ACS analysis Spanish as the one language that falls outside of the Safe Harbor Provision.

Table 6: English Learner Students by Language

Language	English Learners	Percent of Total English Learners
Spanish	4,936	95.47%
Arabic	107	2.07%
Filipino	40	0.77%
Portuguese	10	0.19%
Other non-English Languages	17	0.33%
Punjabi	6	0.12%
Hmong	15	0.29%
Japanese	12	0.23%
Vietnamese	10	0.19%
Mandarin	1	0.02%
Gujarati	2	0.04%
Mixteco	5	0.10%
Cambodian	2	0.04%
Urdu	1	0.02%
Lao	2	0.04%
Ilocano	1	0.02%
Thai	2	0.04%
French	1	0.02%
Total	5,170	

Summary

KCAPTA began the Factor 1 assessment by reviewing the most recent U.S. Census American Community Survey data. The results of this assessment confirmed that Spanish meet FTA's Safe Harbor threshold of 5% or 1,000 persons of the total population of persons eligible to be served or likely to be affected or encountered within KCAPTA's service area.

Data from the California Department of Education identified Kings County's school population of English learners, which aligned with ACS data.

Given the high population of LEP Spanish speakers within KCAPTA's service area translation of documents by KCAPTA is a vital and necessary practice.

Factor 2: Frequency of Contact by LEP Persons with KCAPTA Services

"Recipients should assess, as accurately as possible, the frequency with which they have or should have contact with LEP individuals from different language groups seeking assistance, as the more frequent the contact, the more likely enhanced language services will be needed" (DOT LEP Guidance Section V (2)).

KCAPTA used two sources to determine how frequently LEP individuals use KCAPTA services and how often KCAPTA staff comes in contact with or assists LEP individuals:

1. *KCAPTA Survey*
2. *KCAPTA prior experience*

Transit Rider Survey

In 2018, KCAPTA conducted a transit rider survey designed to quantify usage, measure satisfaction levels, track travel behavior, and identify service perceptions. The objective of the survey was to gain insight into KCAPTA customers opinions spanning across KCAPTA service and compile a demographic profile of the typical KCAPTA rider. Approximately 19% of KCAPTA riders responded. The only other language besides English identified was Spanish. Only 2.61% of the responses received spoke Spanish and 97.39 spoke English. The survey results rider profile are English-speaking female, age 19-30, riding the bus daily.

KCAPTA prior Experience

KCAPTA's prior experience with limited English proficiency persons has been with Spanish-speaking individuals. Staff has encountered Spanish-speaking individuals at outreach activities, at the customer service window, and at public meetings.

KCAPTA's Contractor, MV Transportation staff has also encountered Spanish-speaking individuals at the customer service window, at the bus terminal, on the bus, and on the phone.

Factor 3: The Nature and Importance of the Program, Activity, or Service to People's Lives

"The more important the activity, information, service, or program, or the greater the possible consequences of the contact to the LEP individuals, the more likely language services are needed". (DOT LEP Guidance Section V (3))

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

- KCAPTA website
- Customer service phone lines
- Printed schedules
- Driver inquires

Ensuring that critical information at these interaction points is available in languages commonly spoken is crucial to providing equitable access to KCAPTA's bus services for LEP populations.

Summary

At this point in the Four Factor Analysis, factors 1, 2, and 3 have confirmed that:

- The most prevalent non-English language spoken in the KCAPTA service area is Spanish, accounting for 15.9% of KCAPTA's total population;
- KCAPTA's LEP language group is represented as the top English-learner students in Kings County schools;
- Survey respondents only 2.61% need language assistance in Spanish;
- Language assistance was not requested by LEP customers in any other language than Spanish

It can be concluded that KCAPTA's LEP language group is Spanish. The final step of the required Four Factor analysis will discuss the resources available to develop a language implementation plan to ensure meaningful access for LEP individuals.

Factor 4: Resources Available to the Recipient and Cost

"A recipient's level of resources and the costs imposed may have an impact on the nature of the steps it should take in providing meaningful access for LEP persons." (DOT LEP Guidance Section V (4))

Factor 4 is designed to weigh the demand for language assistance against current and projected financial and personnel resources. According to the Department of Transportation, "Smaller recipients with more limited budgets are not expected to provide the same level of language services as larger recipients with larger budgets. In addition, "reasonable steps" may cease to be reasonable where the cost imposed substantially exceed the benefits." USDOT has advised recipients to carefully explore the most cost-effective means of delivering "competent and accurate" language services to address resource concerns.

Current Language Assistance Measures and Costs

KCAPTA currently provides a wide range of information in Spanish

- At a minimum there is one (1) staff person available during operating hours that is bilingual in English and Spanish.
- A Spanish interpreter can be present at public meeting if requested.
- Public Hearings are noticed in English and Spanish
- Public Hearing materials are provided in English and Spanish
- KCAPTA's website utilizes Google Translate, providing translation in nearly 100 languages
- KCAPTA's vital documents are available in Spanish
- Nearly all of KCAPTA's printed materials, including Rider's Guides and brochures are available in English and Spanish.
- Information transit-related signage on buses is in English and Spanish

Currently, KCAPTA has been successful in utilizing staff in providing language assistance and translation for Spanish-Speakers; therefore there is not an annual budget for this line item. The annual cost associated with the designing and printing of KCAPTA's Riders Guides and other support materials is \$17,500.

Given the percentage of Spanish-speaking LEP individuals in KCAPTA's service area, and their reliance on KCAPTA's transit services, it is fitting the KCAPTA continues to provide written translation and verbal interpretation services to this population.

Language Assistance Measures June 2019 – June 2022

Currently, most of the costs associated with providing Spanish-language translation and interpretations service are for printed materials and notices. KCAPTA will continue to utilize staff for the Spanish-language translation and interpretations. Language Line Solutions services will be used on an as needed bases. Section 4 below outlines KCAPTA's Language Implementation Plan which is intended to support KCAPTA staff in complying with Title VI regulations.

4. LANGUAGE IMPLEMENTATION PLAN

Department of Transportation LEP guidance notes that effective language implementation plans typically included the following five elements: 1) identifying LEP individuals who need language assistance; 2) providing language assistance measures; 3) training staff; 4) providing notice to LEP persons and 5) monitoring and updating the plan.

Element 1: Identifying LEP Individuals Who Need Language Assistance

As discussed in the Four Factor Analysis, KCAPTA reviewed sources to identify its LEP population. One (1) LEP language groups (Spanish) met the Safe Harbor threshold of five percent or 1,000 persons, whichever is less, of the total population of persons eligible to be serviced or likely to be affected or encountered with KCAPTA's service area.

Element 2: Providing Language Assistance Measures

KCAPTA uses a number of techniques and practices to provide productive opportunities for all interested Kings County residents to participate in relevant programs, activities, and services that are being offered or will continue to be offered by KCAPTA including the following:

- Maintain a list of employees who competently speak Spanish and are willing to provide translation and/or interpretation services and distribute this list to staff that regularly have contact with the public.
- Vital documents are available in both English and Spanish.
- Public Notices are available in both English and Spanish.
- General information, such as "Riders Guide" is available in both English and Spanish
- Transit Fares are posted in both English and Spanish
- Outreach meetings/forums are regularly conducted in the County to inform communities of the services offered by KCAPTA. In areas identified with a high concentration of LEP KCAPTA staff will work with other agency to ensure bilingual staff is available to translate information.
- If needed Language Line Solutions will provide translation.

Element 3: Training Staff

The following training procedures will be implemented by KCAPTA:

- KCAPTA currently informs all newly-hired employees of Title VI regulations and their responsibility to assist LEP customers in obtaining language assistance.
- Contracted coach operators, operations supervisors, dispatch, and customer service receive regular Title VI refresher training throughout the year.
- Both KCAPTA staff and Contractor staff will be informed of the language assistance services offered to the public by KCAPTA.
- Staff will be trained on whom to contact when professional interpreter services are required.
- Staff will receive training on how to handle a potential Title VI/LEP complaint.
- Staff will receive training on how to document language assistance request.

Element 4: Providing Notice to LEP Persons

KCAPTA will use a variety of methods to ensure LEP persons are aware of existing and new language assistance measures by:

- Notifications posted in KCAPTA's reception area and meeting rooms.
- Notification posted on the KCAPTA website.
- Flyers for major community workshops and similar meetings include instruction on how to request translation services.
- Notification posted in KCAPTA Riders Guide

Element 5: Monitoring and Updating the Plan

KCAPTA will monitor its implementation of this Title VI Language Assistance Plan as follows:

- KCAPTA will survey employees annually regarding their interaction with LEP individuals.
- Whenever public hearings are noticed, KCAPTA will consider the impact the proposed fare increase; service change, reduction, or loss; or major project will have on KCAPTA's Safe Harbor language populations and will provide notice in appropriate languages.
- KCAPTA's Notice of Language Assistance will be included in all notices of public meetings, including board agendas.
- KCAPTA will monitor requests for translation and adjust practices to meet demand while maintain a basic level of access by LEP populations.
- KCAPTA will monitor whether the need for translation services has changed.
- KCAPTA will determine whether its financial resources are sufficient to fund language assistance resources needed.
- KCAPTA will communicate with LEP individuals by including question about language assistance and information needs on any community surveys.
- On a triennial basis, KCAPTA will review and update census and other LEP data and update its Language Assistance Plan accordingly.