



*KINGS COUNTY AREA
PUBLIC TRANSIT AGENCY*

TITLE VI PROGRAM UPDATE AUGUST 2025 – 2028



KINGS COUNTY AREA PUBLIC TRANSIT AGENCY
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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, 2025 to July 1, 2028.

This Program is being submitted to FTA in accordance with their September 16, 2022, concurrence letter (**Attachment A**) informing KCAPTA that its Program status for the triennial cycle August 1, 2022 – July 31, 2025, was "concur," and establishing June 1, 2025 as the due date for KCAPTA's next Title VI Program update. While KCAPTA received concurrence on its Program, the review assessment included two comments on elements that needed to be addressed in a future submittal. KCAPTA has addressed or clarified as instructed. KCAPTA's responses to these comments are addressed where appropriate within the Program.

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 25-08 approving this 2025 Program update can be found in **Attachment B**.

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

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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.

In KCAPTA's September 16, 2022 concurrence letter, the FTA Region IV Civil Rights Officer (CRO) noted that KCAPTA needed to list out all of the vital documents that are translated into Spanish. This has been provided in **Attachment C**.

KCAPTA revised its Notice of Rights to convey the required information more clearly. KCAPTA updated all Title VI Notices, in all locations, including on KCAPTA buses and on the website during FY 2022.

The revised Notice can be found on KCAPTA's website at <https://www.kartbus.org/title-vi-dbe/> a copy of KCAPTA revised Notice of Rights and list of posting locations is included in **Attachment D**.

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.

KCAPTA's complaint form and process have been translated into our Safe Harbor language and can be viewed on KCAPTA website at <https://www.kartbus.org/title-vi-dbe/> . KCAPTA's Title VI complaint form and process is included in English and Spanish in **Attachment E**.

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.

Since June 2022, the date of KCAPTA's previous Title VI Program Update, KCAPTA has not received any Title VI complaints. No lawsuits have been filed against KCAPTA. KCAPTA customers most often interact with coach operators; therefore, it is to be expected that most Title VI complaints allege discrimination by a coach operator. KCAPTA's Executive Director, Transit Manager, contract transportation services general manager and operation manager are also informed of complaints involving coach operators.

KCAPTA buses are equipped with video and audio recording devices. If a complaint is a valid Title VI concern, the Executive Director contacts the complainant and begins an investigation into the complaint. If a valid Title VI violation has occurred, the Executive Director forwards her findings to contract transportation services general manager, who then initiates appropriate disciplinary action in accordance with KCAPTA policy, Contractor's policy, and applicable Collective Bargaining Agreements (CBA).

If complaints are found to be invalid or when disciplinary action is not warranted, coach operators may be provided with guidance or updated training. Complaints that are incorrectly reported as Title VI complaints are re-routed to the appropriate employee for further investigation. Complaints naming KCAPTA employees other than coach operators would follow a similar process.

In all cases, whether a Title VI complaint is found to be substantiated or unsubstantiated, Executive Director closes the complaint with a letter, phone call, or email, depending on the complainant's request and available contact information. At all time, employee named in the discrimination complaint is provided an opportunity to have union or other representation present during all interviews and are afforded the right to appeal any decision according to applicable KCAPTA policy, Contractor's policy, employee handbook, manuals, and applicable CBAs.

KCAPTA's internal process for reviewing Title VI complaints is included in **Attachment E**. A list of Title VI Complaints, Investigations, and lawsuits can be found in **Attachment F**.

Public Participation Plan

In accordance with 49 CFR Section 21.9 (b), FTA Circular 4702.1B Chapter III-5, KCAPTA has established 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 participation and outreach efforts since April 2022 are documented within the Public Participation Plan

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 2022 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 H**. Census data used to complete the LAP Four Factor Analysis is included within the LAP

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 2025 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.	9	12	11	3	0	0	7	0
Percent of Total Council	43%	57%	53%	14%	0%	0%	33%	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.

In KCAPTA's September 16, 2022, concurrence letter, the FTA Region IX Civil Rights Officer (CRO) stated that it was not clear how minorities are encouraged to participate on boards. KCAPTA's staff makes an effort to hold meetings at times and locations that are more convenient and accessible for minority and LEP communities, and continues to seek input on potential barriers or challenges that may prevent minority populations from participating in meetings.

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 E**.

Title VI Equity Analysis of Constructed Facilities

In accordance with 49 CFR 21.9 and guidance provided in FTA Circular 4702.1B Chapter III-11, KCAPTA is required to conduct a Title VI equity analysis for new facilities to ensure that locations are selected without regard to race, color, or national origin.

FTA Title VI Circular 4702.1B requires that, "The recipient shall completed a Title VI equity analysis during the planning stage with regard to where a project is located or sited to ensure the location is selected without regard to race, color, or national origin."

KCAPTA bus terminal is operating above its capacity. With a growing population in need of transit service, increased bad air quality days, and increasing reliability issues resulting from freight train traffic KCAPTA began the process of planning and constructing a new transit center. In 2017, a site selection study was conducted that recommended a preferred location for the new transit center.

Kings County Association of Governments (KCAG) is the designated Metropolitan Planning Organization (MPO) for Kings County and was the lead agency for the KART Transit Center Site Selection Study. During the Site Selection Study, six public meetings were held, to provide information on the project, review site selection criteria, and recommend sites (**Attachment J**). On July 25, 2018, the Kings County Association of Governments accepted the report and recommendation. KCAPTA Board also took action to accept and recommendations (**Attachment K**).

In 2019, KCAPTA completed the Initial Study/Mitigated Negative Declaration for the New KART Transit Center; this included an Equity Analysis (Analysis) **Attachment I**. This project required land acquisition of twelve parcels and would displace three businesses, no residences were displaced. The Analysis was completed that reviewed a variety of impacts associated with the siting of the facility. Section 4 of the Analysis reviewed the Site Selection Study to ensure that the location was selected without regard to race, color, or national origin.

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.

The successful delivery of transit service is based on two key components: density and demand.

- Density of land uses is one of the most important determinants of transit ridership. Population density is the number of people in a unit of area, such as a square mile or an acre, or more refined units for urban areas. Density can include both residents and employment within the area. The more people there are in an area, the more they will ride transit if it is available. Consequently, population density is considered when determining appropriate service levels. In general, successful transit routes serve corridors with higher population density. The Hanford Lacey Blvd / Centennial Drive area is an example of high employment centers, services and other trip attractors and generators warranting more frequent levels of service.
- Demand is defined as the frequency with which riders use a particular transit service. Demand is often measured in the number of passenger boardings or passenger trips. In areas where population density may

be less concentrated, transit demand can occur if there are trip generators or attractors that make transit attractive to the rider.

KCAPTA's service area includes both high and low-density areas, and the demand for transit service varies significantly in the various communities within Kings County. Due to resource constraints, if demand and/or population density in a corridor fall below one half of KCAPTA's service area average, service may not operate within the standards outline below.

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.

Table 3: Local Routes (as of March 1, 2025)

Route	Weekday Peak/Off Peak Headways
Hanford Routes 1 – 9	30/30
Lemoore Route 20	30/30

Table 4: Regional Routes (as of March 1, 2025)

Route	Weekday Peak/Off Peak Headways
Avenal Route 12	4 trips per weekday/ 2 trips Saturday
Corcoran Route 13	3 trips per weekday/0
Laton Route 14	2 trips per weekday/0
Visalia Route 15	4 trips per weekday/2 trips Saturday
Fresno Route 17	2 trips on Wednesday and Friday/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 – FTA 2022 Concurrence Letter and Notice of 2025 Title VI Program Update Due Date
- ATTACHMENT B – Board Approval of Title VI Program
- ATTACHMENT C – List of Vital Documents translated into Spanish
- ATTACHMENT D – Notice of Rights and Posting Locations
- ATTACHMENT E – Title VI Complaint Form and Process; Internal Complaint Process
- ATTACHMENT F – Title VI Summary of Complaints, Investigations, and Lawsuits
- ATTACHMENT G – Public Participation Plan
- ATTACHMENT H – Language Assistance Plan and Four Factor Analysis
- ATTACHMENT I – Fixed Facility Analysis
- ATTACHMENT J – List of Meetings
- ATTACHMENT K – Site Selection Study