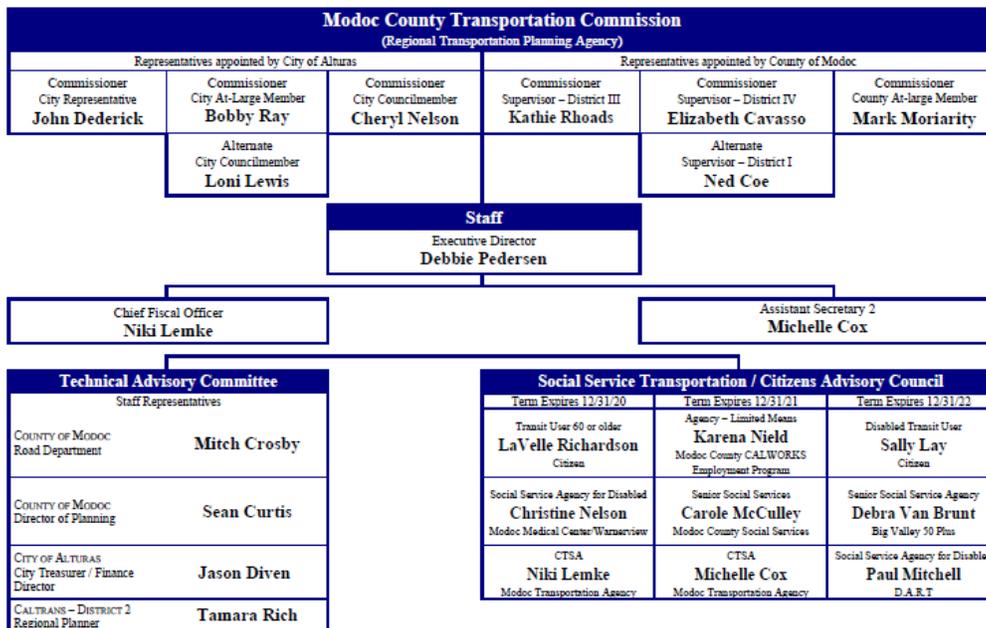




**MODOC COUNTY  
TRANSPORTATION COMMISSION**

# Title VI Non-Discrimination Compliance Plan Non-Transit



01/2018

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MCTC  
108 S. Main St.  
Alturas, CA 96101  
(530) 233-6410

Adopted by the Modoc County Transportation Commission \*\*\*\*\* \*, \*\*\*\*

To obtain services or copies in an alternate format or language, please contact the Modoc County Transportation Commission at (530) 233-6410, email [dpedersen@modoctransportation.com](mailto:dpedersen@modoctransportation.com), or visit the Commission's website at <http://www.modoctransportation.com>

Para obtener servicios o copias en un formato o idioma alternativo, comuníquese con la Comisión de Transporte del Condado de Modoc al (530) 233-6410, envíe un correo electrónico [dpedersen@modoctransportation.com](mailto:dpedersen@modoctransportation.com) visite el sitio web de la Comisión en <http://www.modoctransportation.com>

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## Title VI Program Policy and Complaint Procedures

### Policy

Modoc County Transportation Commission (MCTC) is committed to ensuring that no person is excluded from participation in, denied the benefits of, or otherwise subjected to discrimination under any of its programs, activities, or services on the basis of race, color or national origin. All persons, regardless of their citizenship, are covered under this regulation. In addition, MCTC prohibits discrimination based on race, color or national origin in its employment and business opportunities. MCTC will:

- not condone retaliation against an individual for his/her involvement in asserting his/her rights pursuant to Title VI or because he/she filed a complaint or participated in an investigation under Title VI, and/or this regulation;
- ensure that its programs, policies, and activities comply with the Department of Transportation (DOT) Title VI Regulations of the Civil Rights Act of 1964;
- ensure the level and quality of its transportation service is provided without regard to race, color, or national origin;
- promote the full and fair participation of all affected populations in the transportation decision-making process;
- make good faith efforts to achieve environmental justice as part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, activities, and services on minority populations and low-income populations within the region as provided herein;
- ensure that Limited English Proficient (LEP) individuals have access to MCTC's programs, activities, and services; and
- post this plan and policy on the website at [www.modoctransportation.com](http://www.modoctransportation.com) and within the business office.

These regulations shall be maintained in English and made available in Spanish upon request.

### Applicability

This policy is applicable to all MCTC employees, members of the public and all contractors hired by MCTC.

Failure of an MCTC employee to follow this policy and procedure may subject such employee to disciplinary action up to and including employment termination.

### Definitions

**Adverse Effect** means having a harmful or undesired effect.

**Discrimination** refers to any act or inaction, whether intentional or unintentional, in any program or activity of a Federal aid recipient, sub-recipient, or contractor that results in disparate treatment, disparate impact, or perpetuates the effects of prior discrimination based on race, color or national origin.

**Limited English Proficient (LEP) Persons** are individuals for whom English is not their primary language and who have a limited ability to speak, understand, read, or write English. It includes

people who reported to the U.S. Census that they do not speak English well or do not speak English at all.

**Low-Income Population** means any readily identifiable groups of low-income individuals who live in geographic proximity, and if circumstances warrant, geographically dispersed transient persons (such as migrant workers or Native Americans) who will be similarly affected by a proposed DOT program, policy, or activity.

**Minority Individuals**

1. American Indian and Alaska Native, which refers to people having origins in any of the original people of North and South America (including Central America), and who maintain tribal affiliation or community attachment.
2. Asian, which refers to people having origins in any of the original people from the Far East, Southeast Asia, or the Indian subcontinent.
3. Black or African American, which refers to people having origins in any of the Black racial groups of Africa.
4. Hispanic or Latino, which includes people of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race.
5. Native Hawaiian and Other Pacific islanders, which refers to people having origins in any of the original people of Hawaii, Guam, Samoa, or other Pacific Islands.

**National Origin** means the nation in which a person was born, or where the person’s parents or ancestors were born.

**Race** means a group of people united or classified together based on common history, nationality, or geographic distribution.

**Recipient** means one that has received or is receiving Federal financial assistance. The term includes sub-recipients of a recipient and sub-recipients in FTA State administered programs.

**Retaliation** Any adverse action taken against another individual because of his/her participation in the complaint, investigation, or hearing relating to this policy or the provision of federal or state law.

**Vital Documents** are documents that convey information that critically affects the ability of the customer to make informed decisions about his/her participation in the program (e.g., public notices, consent forms, complaint forms, eligibility rules, notices pertaining to the reduction, denial or termination of services or benefits, right to appeal, and notices informing customers of the availability of free language assistance).

## General Requirements and Guidelines

MCTC will carry out its programs, activities, and services in compliance with Title VI of the Civil Rights Act of 1964. MCTC or any of its employees will not, on the grounds of race, color, national origin, exclude any person from participating in, deny the benefits of, or subject him/her to discrimination under any MCTC programs, services, or activities.

MCTC, any of its employees, or contractors will not, on the grounds of race, color, or national origin:

- a. Provide any service, financial aid, or benefit that is different from that provided to others.
- b. Subject an individual to segregation or segregation or separate treatment.
- c. Restrict an individual in the enjoyment of any advantage or privilege enjoyed by others.
- d. Deny any individual service, financial aid, or benefits under any MCTC programs, services, or activities.
- e. Treat individuals differently in terms of whether they satisfy admission or eligibility requirements.
- f. Deny an individual the opportunity to participate as a member of a planning or advisory body.

MCTC shall evaluate significant plan and program changes to determine whether these changes have a discriminatory impact on low-income and Limited English Proficiency individuals.

MCTC conducts regular board meetings every other month to ensure that all individuals are afforded an opportunity to participate in transportation decisions. If items for board approval become apparent before that regular meeting, a special meeting is scheduled.

MCTC and MCTC's legal counsel will maintain a list (a minimum of four years in active status) of any Title VI investigations, complaints, or lawsuits filed which allege MCTC discriminated against a person or group on the basis of race, color, or national origin. This list will include:

- a. The date the investigation, complaint, or lawsuit was filed.
- b. A summary of the allegation(s).
- c. The status of the investigation, complaint, or lawsuit; and
- d. Any actions or corrective actions taken by MCTC in response to the investigation, complaint, or lawsuit.

MCTC will keep the public informed of the protections against discrimination afforded to them by Title VI and MCTC's obligations under Title VI by posting a *Title VI Policy Statement* (Attachment A) and associated English and Spanish *Complaint Forms*, on MCTC's website at [www.modctransportation.com](http://www.modctransportation.com) and at the MCTC's office.

MCTC will take steps to ensure meaningful access to the benefits, services, information and other important portions of its programs, activities, and services for individuals that are Limited English Proficient (LEP).

MCTC has met the Safe Harbor Provision by providing a written Spanish translation of the Complaint form and Notice of Title VI rights. In addition, oral translation is made available as needed.

MCTC will provide information, upon request from FTA, and investigate complaints of discrimination, or resolve concerns about possible noncompliance with Title VI.

MCTC will submit its Title VI Program to the FTA's regional civil rights officer and the California Department of Transportation Division of Mass Transportation once every three years to ensure compliance with Title VI Requirements.

MCTC will ensure that minority and low-income individuals have meaningful access to MCTC's programs, activities, and services.

## Environmental Justice Considerations

MCTC shall integrate an environmental justice analysis into its National Environmental Protection Act (NEPA) documentation of construction projects. MCTC is not required to conduct environmental justice analyses of projects where NEPA documentation is not required. MCTC will consider preparing an environmental assessment (EA) or environmental impact statement (EIS) to integrate into its documents the following components:

- a. A description of the low-income and minority population within the study area affected by the project, and a discussion of the method used to identify this population (e.g., analysis of Census data, direct observation, or a public involvement process).
- b. A discussion of all adverse effects of the project both during and after construction that would affect the identified minority and low-income populations.
- c. A discussion of all positive effects of the project that would affect the identified minority and low-income populations, such as transit needs or services or accessibility.
- d. A description of all mitigation and environmental enhancement actions incorporated into the project to address the adverse effects, including, but not limited to, any special features of the relocation program that go beyond the requirements of the Uniform Relocation Act and address adverse community effects such as separation or cohesion issues; and the replacement of the community resources destroyed by the project;
- e. A discussion of the remaining effects, if any, and why further mitigation is not proposed; and
- f. For projects that traverse predominantly minority and low-income and predominantly non-minority and non-low-income areas, a comparison of mitigation and environmental enhancement actions that affect predominantly low-income and minority areas with mitigation implemented in predominantly non-minority or non-low-income areas.

## Limited English Proficient (LEP) Individuals and Public Participation Requirements

MCTC will seek out and consider the viewpoints of minority, low-income, and Limited English Proficient (LEP) populations while conducting public outreach and involvement activities. MCTC's public participation strategy will offer early and continuous opportunities for the public to be involved in the identification of social, economic, and environmental impacts of proposed transportation decisions.

MCTC will ensure that individuals have access to its programs, activities, and services by developing and carrying out the language plan herein. MCTC will continually assess the language assistance needs of the population to be served.

MCTC will use the following four (4) factors to determine what measures must be undertaken to provide reasonable and meaningful access to LEP individuals.

- a. Languages likely to be encountered and the number or proportion of LEP persons in the eligible service population likely to be affected by the program, activity, or service.
- b. Frequency with which LEP individuals encounter MCTC programs, activities, and services.
- c. Importance of the program, activity, or service provided by MCTC to LEP individuals lives.
- d. Resources needed to provide effective language assistance and costs.

### Oral Language Assistance

MCTC provides an interpretation service by appointment.

### Complaints, Lawsuits and Appeals

**How to File a Title VI Complaint with MCTC:** Any person who believes that he/she, or as a member of any specific class of individuals, has been subjected to discrimination on the basis of race, color, national origin, with respect to MCTC's programs, activities, services, or other transit related benefits, may file a written complaint with MCTC. A complaint may be filed by the individual or by a representative. A complaint must be filed within 180 days after the date of the alleged discrimination, but complainants are encouraged to submit complaints as soon as possible. MCTC will promptly investigate all complaints filed under Title VI, pursuant to this regulation.

***Complaint must include the following information:***

- a. A complaint must be in writing and signed and dated by the complainant or his/her representative before any action can be taken.
- b. A complaint shall state, as fully as possible, the facts and circumstances surrounding the alleged discrimination, including the name and address of the complainant, the date, time, and location of the incident. The complaint shall include a description of the program, activity, or service on which the alleged discrimination occurred.

A *Complaint Form* (Attachment C) can be used to file a Title VI complaint with MCTC. A complaint form will be made in an accessible format upon request. A complaint form can be obtained at:

- a. MCTC's website [www.modctransportation.com](http://www.modctransportation.com)
- b. By calling MCTC at (530) 233-6410 and a complaint form can be mailed.
- c. By picking up a complaint form at 108 S. Main St., Alturas, CA 96101.

If the complaint is received by anyone besides MCTC'S Executive Director, the individual in receipt of the complaint shall forward it to the Executive Director as soon as practicable but no later than two (2) business days of receipt. The Executive Director shall immediately provide a copy of the

complaint to the Chair of the MCTC regarding the program or activity that is identified as being out of compliance.

### **Procedures for Investigating Complaints**

The Executive Director shall promptly investigate the alleged complaint and shall prepare a written response as soon as possible, but no later than ten (10) business days of his/her receipt of the complaint. The Executive Director may consult with appropriate staff in the preparation of his/her response to the complaint.

### **Efforts to Contact Complainant**

The Executive Director shall make efforts to speak (meeting or telephone conversation) with the complainant, at which time the complainant may give written or oral evidence supporting the allegation that his/her rights under Title VI have been violated. The Executive Director shall review and consider the response prepared by the Executive Director, all the information provided by the complainant, if any, and any other evidence available regarding the allegations of the complaint. The Executive Director shall prepare a written report of his/her findings and if corrective action is required, a timetable for the completion of such action.

### **Completion of Investigation**

As soon as it is practicable, but no later than twenty (20) business days following receipt of the initial complaint, the Executive Director shall inform the complainant of his/her findings and any corrective action to be taken as a result of the complaint together with the timetable for completion of such action.

### **Appeal to MCTC Chair**

If the complainant is not satisfied with the findings and/or action of MCTC's Executive Director, then the complainant may file his/her Complaint with the Chair of the MCTC or with the FTA's Office of Civil Rights.

### **Appeal Process**

If the complainant chooses to file his/her complaint with the Chair of the MCTC, then the complaint and any supporting documentation should be submitted within five (5) business days of his/her receipt of the results of the Executive Director's investigation, with the Chair of MCTC by providing it to the Executive Director at MCTC's facility. Upon review of the file, the Chair shall notify the complainant of what actions, if any, will be taken as a result of the review by the Chair with ten (10) business days of the Chair's notification that the complainant is not satisfied with the results of the Executive Director's investigation. The decision of the Chair of MCTC shall be final.

### **Timeline waiver**

Any timeline set forth herein may be extended by the Executive Director upon a showing of good cause.

### **How to file a Title VI complaint with the FTA Office of Civil Rights**

Any person who believes that he/she or as a member of any specific class of individuals, has been subjected to discrimination on the basis of race, color, national origin, age, sex, sexual

orientation, or gender identity, with respect to MCTC's programs or activities, may file a written complaint with FTA. A complaint may be filed by the individual or by a representative. A complaint must be filed within 180 days after the date of the alleged discrimination. FTA will promptly investigate all Complaints filed under Title VI in accordance with DOT regulations 49 CFR 21.11 (b) and 21.11 (c)

- A. A complaint must include the following information: A complaint must be in writing and signed and dated by the complainant or his/her representative before any action can be taken. In cases where a complainant is unable or incapable of providing a written statement, but wishes FTA or DOT to investigate alleged discrimination, a verbal complaint of discrimination may be made to the FTA Director, Office of Civil Rights. If necessary, the Civil Rights Official will assist the person in converting the verbal complaint into writing. All complaints must, however, be signed by the complainant or his/her representative.

[FTA.ADAAssistance@dot.gov](mailto:FTA.ADAAssistance@dot.gov)

Federal Transit Administration Office of Civil Rights

Attn: Title VI Program Coordinator

East Building, 5<sup>th</sup> Floor – TCR

1200 New Jersey Avenue, S.E.

Washington, DC 20590

TTY: 1 800 877-8339

Voice: 1 866 377-8642

- B. A complaint shall state, as fully as possible, the facts and circumstances surrounding the alleged discrimination, including the date, time, and location of the incident. The complaint shall include a description of the program, activity, or service on which the alleged discrimination occurred.

### **Complaint Acceptance**

Once a complaint has been accepted, FTA will notify MCTC that it has been subject to a Title VI complaint and ask MCTC to respond in writing to the complainant's allegations. Once the complainant agrees to release the complaint to MCTC, FTA will provide MCTC with the complaint. FTA may choose to close a complaint if the complainant does not agree to release the complaint to MCTC. FTA strives to complete a Title VI complaint investigation within 180 days of the acceptance date of a complaint.

### **Investigations**

FTA will make a prompt investigation whenever a compliance review, report, complaint, or any other information indicates a possible failure to comply with Title VI Regulations. FTA's investigation will include a review of the pertinent practices and policies of MCTC, the circumstances under which the possible noncompliance occurred, and other factors relevant to a determination as to whether MCTC has failed to comply with Title VI regulations.

Following the investigation, FTA's Office of Civil Rights will transmit to the complainant and MCTC one of the following three letters based on its findings:

- a. *Letter of Resolution*: explains the steps that MCTC has taken or promises to take to come into compliance with Title VI.
- b. *Letter of Finding (Compliance)*: explains that MCTC is found to have complied with Title VI. This letter will include an explanation of why MCTC was found to have complied and provide notification of the complainant's appeal rights.
- c. *Letter of Finding (Noncompliance)*: explains that MCTC is found to be in noncompliance. This letter will include each violation referenced, the applicable regulations, a brief description of proposed remedies, notice of the time limit on the conciliation process, the consequences for failure to achieve voluntary compliance, and an offer of assistance to MCTC in devising a remedial plan for compliance.

### **Appeals Process**

The letters of finding and resolution will offer the complainant and MCTC the opportunity to provide additional information that would lead FTA to reconsider its conclusions. FTA requests that the parties in the complaint provide this additional information within 60 days of the date of the FTA letter of finding. FTA's Office of Civil Rights will respond to an appeal either by issuing a revised letter of resolution or finding to the appealing party, or by informing the appealing party that the original letter of resolution or finding remains in force.

### Deficiencies with Title VI Compliance

Compliance Reviews will be conducted periodically by FTA, as part of its ongoing responsibility pursuant to its authority under 49 CFR 21.11(a).

If FTA determines that MCTC is in noncompliance with Title VI, it will transmit a *Letter of Findings* that describes FTA's determination and requests that MCTC voluntarily take corrective action(s) which FTA deems necessary and appropriate.

MCTC will submit a remedial action plan including a list of planned corrective actions and, if necessary, sufficient reasons and justification for FTA to reconsider any of its findings or recommendations within 30 days of receipt of FTA's *Letter of Findings*.

### Administration of Regulation

MCTC will integrate the provisions within its Title VI Program into all programs and activities. MCTC will integrate the Title VI Program into its policies and procedures.

### Limited English Proficiency (LEP) Plan

#### Introduction

This Limited English Proficiency (LEP) Plan has been prepared to address the MCTC's responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, Federal Transit Administration Circular 4702.1A dated May 13, 2007, which states that no person shall be subjected to discrimination on the basis of race, color or national origin.

Executive Order 13166, titled Improving Access to Services for Persons with Limited English Proficiency, indicates that differing treatment based upon a person's inability to speak, read, write, or understand English is a type of national origin discrimination. It directs each federal agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discrimination does not take place. This order applies to all state and local agencies which receive federal funds.

### Plan Summary

MCTC is the regional transportation planning agency for Modoc County. MCTC has developed this LEP Plan to help identify reasonable steps for providing language assistance to persons with limited English proficiency who wish to access services provided by MCTC. As defined in Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write, or understand English.

This plan outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, staff training that may be required, and how to notify LEP persons that assistance is available.

To prepare this plan, MCTC undertook the U.S. Department of Transportation (U.S. DOT) four-factor LEP analysis which considers the following factors:

1. The number or proportion of LEP persons in the service area who may be served or are likely to encounter an MCTC program or activity.
2. The frequency with which LEP persons encounter MCTC programs or activities.
3. The nature and importance of programs, activities or services provided by MCTC to the LEP population.
4. The resources available to MCTC and overall costs to provide LEP assistance.

A summary of the results of the MCTC four-factor analysis follows.

### Four-Factor Analysis

1. The number or proportion of LEP persons in the service area who may be served or are likely to encounter a MCTC program, activity, or service.

In review of the 2015 U.S. Census Language Survey Report and determined that 1094 persons in Modoc County [12.5 % of the population] speak a language other than English. In Modoc County, 498 persons [45.5%] indicate having limited English proficiency; that is, they speak English "not very well" while 596 speak English "very well."

In Modoc County, of those persons with limited English proficiency, 906 (10.3% of the total population) speak Spanish; the remaining 188 respondents speak approximately 33 different languages, each accounting for less than 1.6% of the population.

2. The frequency with which LEP persons encounter MCTC programs or activities.

MCTC assessed the frequency with which staff have, or could have, contact with LEP persons. This includes documenting phone inquiries for requests for interpreters and translated documents. MCTC staff have stated they recall having none or just 1 or 2 calls

where an interpreter was needed. Based on this information MCTC will continue to schedule appointments with an interpretation service as needed. MCTC works with local community service agencies having high LEP person traffic and ensure that language assistance information is posted in areas such as buses website and MCTC office.

3. The nature and importance of programs, activities or services provided by MCTC to the LEP population.

The largest geographic concentration of LEP individuals in the MCTC service area is Spanish. The 2010 Census indicates that 86.7% of Modoc residents over 5 years of age speak only English with 13.3% (1,205 people) speaking a language other than English of which 11.8% (1069 people) speak Spanish. 380, or 4.2%, of Spanish speaking residents noted that they speak English less than “very well.” MCTC planning documents, meetings, workshops, etc., are available to the LEP and public.

MCTC would most likely encounter LEP individuals at the MCTC office where community outreach events and posters are displayed relating to transportation planning activities.

4. Assessment of the resources available to MCTC and overall costs to provide LEP assistance.

MCTC assessed its available resources that could be used for providing LEP assistance, including determining the cost of a professional interpreter and translation service on an as-needed basis, which of its documents would be the most valuable to be translated if the need should arise, and taking an inventory of available organizations that MCTC could partner with for outreach and translation efforts. The amount of staff that might be needed was also considered. See Attachment E-1 for a summary. Based on the four-factor analysis, MCTC developed its LEP Plan as outlined in the following section.

#### Limited English Proficiency (LEP) Plan Outline

*How MCTC and staff may identify an LEP person who needs language assistance:*

1. Examine records to see if requests for language assistance have been received in the past, either at meetings or over the phone, to determine whether language assistance might be needed at future events or meetings.
2. Have staff greet participants as they arrive to MCTC sponsored events. By informally engaging participants in conversation, it is possible to gauge each attendee’s ability to speak and understand English.
3. Have Census Bureau Language Identification flashcards available at MCTC meetings. This will assist MCTC in identifying language assistance needs for future events and meetings.
4. Have Census Bureau Language Identification flashcards available at the office to assist staff in identifying specific language assistance needs of customers. If such individuals are encountered, staff will be instructed to try to obtain contact information to give to MCTC management staff for follow-up.
5. MCTC staff will be surveyed on their experience concerning any contacts with LEP persons during the previous year.

## Language Assistance Measures

There are numerous language assistance measures available to LEP persons, including both oral and written language services. There are also various ways in which MCTC staff responds to LEP persons, whether in person, by phone or in writing.

- a. Provide Spanish-speaking interpreter by appointment at the office.
- b. Network with local human service organizations that provide services to LEP individuals and seek opportunities to provide information on MCTC programs and services;
- c. Placement of statements in notices and publications that interpreter services are available for these meetings, with seven (7) days advance notice;
- d. Survey bus drivers and other staff annually on their experience concerning any contacts with LEP persons during the previous year;
- e. Post MCTC's Title VI Program and LEP Plan on the agency website, [www.modoctransportation.com](http://www.modoctransportation.com), and at the office;
- f. Provide travel training to LEP persons with the assistance of bilingual staff; and
- g. When an interpreter is needed, for a language other than Spanish, in person or on the telephone, staff will utilize a professional interpreter service.

## Staff Training

The following training has been and continues to be provided to MCTC staff:

1. Information on the MCTC Title VI Procedures and LEP responsibilities (ongoing).
2. Description of language assistance services offered to the public (ongoing)
3. How to handle a potential Title VI / LEP complaint (ongoing)

## Outreach Techniques

To ensure that LEP individuals are aware of MCTC's language assistance measures, MCTC provides the following:

- a. Spanish language contact information, phone, and email is posted on the MCTC website home page, at the office, and on planning documents.
- b. Bilingual staff available for in-person or phone customer service at the MCTC office by appointment.

Additionally, when staff prepares a document or schedules a meeting, for which the target audience is expected to include LEP individuals, then documents, meeting notices, flyers and agendas can be provided upon request. Notices are posted in the following locations:

- a. MCTC office
- b. Alturas City Hall
- c. Modoc County Courthouse
- d. MCTC website

Such notices may also be posted or announced with local stakeholders and community centers. Interpreters will be provided and made available as needed.

### Monitoring and Updating the LEP Plan

MCTC will update the LEP plan as required by U.S. DOT. At a minimum, the plan will be reviewed and updated every three (3) years in conjunction with the Title VI submission, when data from the 2020 U.S. Census is available, or when it is clear that higher concentrations of LEP individuals are present in the MCTC service area. Updates will include the following:

- a. The number of documented LEP person contacts encountered annually
- b. How the needs of LEP persons have been addressed
- c. Determination of the current LEP population in the service area
- d. Determination as to whether the need for translation services has changed
- e. Determine whether local language assistance programs and funding have been effective and sufficient to meet any needs
- f. Determine whether MCTC has fully complied with the goals of the LEP Plan
- g. Determine whether complaints have been received concerning MCTC's failure to meet the needs of LEP individuals

### Dissemination of the LEP Plan

A link to the MCTC's LEP Plan and the Title VI Program is included on the MCTC website at [www.modoctransportation.com](http://www.modoctransportation.com).

Any person or agency with internet access will be able to access and download the plan from the MCTC website. Alternatively, any person or agency may request a copy of the plan via telephone, mail, or in person and shall be provided a copy of the plan at no cost. LEP individuals may request copies of the plan in translation which MCTC will provide, if feasible.

Questions or comments regarding the LEP Plan may be submitted to the Modoc County Transportation Commission, Executive Director:

Modoc County Transportation Commission  
Debbie Pedersen, Executive Director  
108 S. Main Street  
Alturas, CA 96101  
(530) 233-6410  
[dpedersen@modoctransportation.com](mailto:dpedersen@modoctransportation.com)

## Public Participation Plan

### Summary of Public Participation Efforts

Over the last reporting period, MCTC conducted the following public outreach and involvement activities:

- Main Street Design Committee Outreach
- MCTC meetings
- 2019 Regional Transportation Plan Workshop

### Public Meetings and Outreach

The MCTC Board Meetings are regularly scheduled public meetings that are conducted on the first Tuesday of February, April, June, August, October, and December annually. All timetables and public meeting information are available on the MCTC website prior to the meeting. Special Arrangements for “free” transportation to and from MCTC meetings will be provided to elderly, disabled, and persons with limited means, within 10 miles of meeting location and with 48-hour advance notice. In addition to the MCTC public meetings, special events are noticed in the local newspaper and by posting flyers in the office, at the Modoc County Courthouse, Alturas City Hall, at our local grocery stores, and on the MCTC website.

MCTC contacts a bilingual social service employee that provides translation for Spanish-speaking customers. Bilingual assistance is utilized in outreach programs when needed and appropriate.

## Attachment A

### POLICY STATEMENT

The Modoc County Transportation Commission (MCTC) is committed to providing public transportation in an environment that is free from discrimination on the basis of race, color or national origin. MCTC operates its programs, activities and services without regard to race, color or national origin.

As a Federal Transit Administration (FTA) fund recipient, Modoc County Transportation Commission will ensure that its programs, policies and activities comply with Title VI of the Civil Rights Act of 1964, as amended, and Department of Transportation regulations.

Any person, who believes that he/she, has been subjected to discrimination on the basis of race, color or national origin, with respect to MCTC's programs, activities, services, or other transit related benefits, may file a Title VI complaint. Complaints must be filed in writing and signed by the complainant, or a representative, and should include the complainants name, address, and telephone number or other means by which the complainant can be contacted. Complaints must be filed within 180 days of the date of the alleged discriminatory act.

To request additional information on the MCTC non-discrimination obligations or to file a Title VI Complaint, please submit your request or complaint in writing to:

Modoc County Transportation Commission  
Attn: Debbie Pedersen, Executive Director  
108 S. Main St.  
Alturas, CA 96101

**Complaint forms can also be obtained at [www.modoctransportation.com](http://www.modoctransportation.com)**

**Federal Transit Administration (FTA) Title VI Complaints may be filed directly to:**

Federal Transit Administration Office of Civil Rights  
Title VI Program Coordinator  
East Building, 5<sup>th</sup> Floor-TCR  
1200 New Jersey Avenue, SE  
Washington, DC 20590

## Attachment B

### **LIST OF TRANSIT-RELATED TITLE VI INVESTIGATIONS, COMPLAINTS, AND LAWSUITS (GENERAL REQUIREMENT)**



Modoc County Transportation Commission does not have any past, current, or pending Title VI complaints

Attachment C

Complaint Form



MODOC COUNTY  
TRANSPORTATION COMMISSION

**TITLE VI DISCRIMINATION COMPLAINT FORM**

**108 S. Main St., Alturas, CA 96101**

Complainant's Name: \_\_\_\_\_

Street Address: \_\_\_\_\_

City/State/Zip: \_\_\_\_\_

Phone: \_\_\_\_\_

E-mail Address: \_\_\_\_\_

Date of Violation: \_\_\_\_\_

Time of Violation: \_\_\_\_\_

Date of Complaint: \_\_\_\_\_

Place of Violation: \_\_\_\_\_

Bus Number: \_\_\_\_\_

Bus Route: \_\_\_\_\_

Discrimination because of:

Race

Color

National

Origin

Please provide the names(s) of the MCTC employee(s) who allegedly discriminated against you, including their job titles (if known). \_\_\_\_\_

\_\_\_\_\_

Identify what MCTC service, program, or activity did not comply with Title VI of the Civil Rights Act of 1964. \_\_\_\_\_

\_\_\_\_\_

Identify individuals by name, address and phone number that has information relating to the violation. \_\_\_\_\_

\_\_\_\_\_

Explain as clearly as possible what happened, how you feel you were discriminated against and who was involved. Please include how other individuals were treated differently from you. \_\_\_\_\_

\_\_\_\_\_

Signature of Complainant: \_\_\_\_\_ Date: \_\_\_\_\_

Attachment C (Spanish)

Complaint Form



MODOC COUNTY  
TRANSPORTATION COMMISSION

**FORMULARIO DE QUEJA POR DISCRIMINACIÓN DEL TÍTULO VI**  
**108 S. Main St., Alturas, CA 96101**

Nombre del demandante: \_\_\_\_\_  
Dirección: \_\_\_\_\_  
Ciudad/Estado/Zip: \_\_\_\_\_  
Teléfono: \_\_\_\_\_ Dirección de correo electrónico: \_\_\_\_\_  
Fecha de violación: \_\_\_\_\_ Hora de la infracción: \_\_\_\_\_  
Fecha de la queja: \_\_\_\_\_ Lugar de violación: \_\_\_\_\_  
Número de \_\_\_\_\_ autobús: Ruta del autobús: \_\_\_\_\_

Discriminación por:  
Color de la raza Origen nacional

Proporcione los nombres de los empleados de MCTC que supuestamente lo discriminaron, incluidos sus puestos de trabajo (si se conocen). \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Identificar qué servicio, programa o actividad de MCTC no cumplía con el Título VI de la Ley de Derechos Civiles de 1964. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Identificar a las personas por nombre, dirección y número de teléfono que tenga información relacionada con la violación. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Explique lo más claramente posible lo que sucedió, cómo se siente que fue discriminado y quién estuvo involucrado. Incluya cómo otras personas fueron tratadas de manera diferente a usted. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Firma del demandante: \_\_\_\_\_ Fecha: \_\_\_\_\_

Attachment D  
Minority Representation



**TABLE DEPICTING MINORITY REPRESENTATION OF NON-ELECTED  
SOCIAL SERVICE TRANSIT ADVISORY COMMITTEE**

<b>Committee</b>	<b>Caucasian</b>	<b>Latino</b>	<b>African American</b>	<b>Asian American</b>	<b>Native American</b>
<b>Population</b>	<b>83.46%</b>	<b>13.86%</b>	<b>0.85%</b>	<b>0.81%</b>	<b>3.82%</b>
<b>Social Service Transit Advisory Committee</b>	<b>82.35%</b>	<b>5.88%</b>	<b>0%</b>	<b>0%</b>	<b>17.65%</b>

Modoc County Transportation Commission encourages participation on non-elected committees via requests for participation or by nomination of persons involved with local human services agencies, non-profit community-based organizations, and other local stakeholders.

**Attachment E-1**

<b>MCTC Assessment of Available Resources</b>	
<i>Professional interpreter</i>	Not available - rural area
<i>Translation service</i>	Not readily available
<i>Partnering Agencies</i>	Currently partner with agencies