

**City of South Pasadena:  
Title VI Civil Rights  
Transit Division  
Compliance Manual**



*This manual was written by Transit Division Staff and approved by City Council in February 2014. All data gathered for the compilation of this manual was obtained from the U.S. Census Bureau.*

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## Introduction:

### *The City of South Pasadena: Transit Division's Pledge To Fair and Equal Access*

The City of South Pasadena is deeply committed to protecting the rights of its residents. Per Title VI of the Civil Rights Act of 1964, the City has redesigned its Transit Division to ensure that no citizen, eligible for Dial-A-Ride, is excluded from its services due to race, color, or national origin.

Since its inception, the overarching goal of Dial-A-Ride is to provide the utmost in services. This manual is no exception. After careful and thorough research, this booklet was specifically constructed to further protect the residents of South Pasadena from discrimination when utilizing public services. At no time should any resident be discriminated against or excluded from Dial-A-Ride services based on race, color, or national origin. This guide details the rights afforded to the residents of South Pasadena and the legal actions they may pursue to protect themselves from said discrimination.

Moreover, this manual allows the Transit Division and its customers to work together to maintain and build a better Division. The City of South Pasadena regards this issue and others pertaining to customer service very highly and is dedicated to working to improve and maintain exceptional service. Thus, the City, along with the Transit Division, implores the residents to thoroughly read this manual and exercise any tools and resources provided to them.



The City of South Pasadena, in accordance with the Civil Rights Act of 1964, and as a federally funded entity, of Federal Transit Administration (FTA) of the U.S. Department of Transportation (US DOT), is obligated to offer its residents the following:

- The benefits of services are shared equitably throughout the City
- The quality of services are adequate to provide equal access to all patrons
- No one is excluded from contributing in South Pasadena's, Dial-A-Ride, planning and development processes
- Process and procedures are implemented which prohibit discrimination of any kind, both intentional and unintentional

The South Pasadena Transit Division worked to compile this manual which best reflects the City, its' residents, and the Dial-A-Ride service. The program has been redesigned and updated to meet federal regulations and provide the utmost in customer service.



## Notice to the Public:

*The following public notice will be posted in all operating Dial-A-Ride vehicles, The Dial-A-Ride office, and on the City of South Pasadena's website.*

Per Title VI of the Civil Rights Act of 1964, the residents of the City of South Pasadena cannot be denied access to Dial-A-Ride services based on race, color, or national origin. The City of South Pasadena pledges to protect these rights and has taken the necessary precautions. Residents are assured the following:

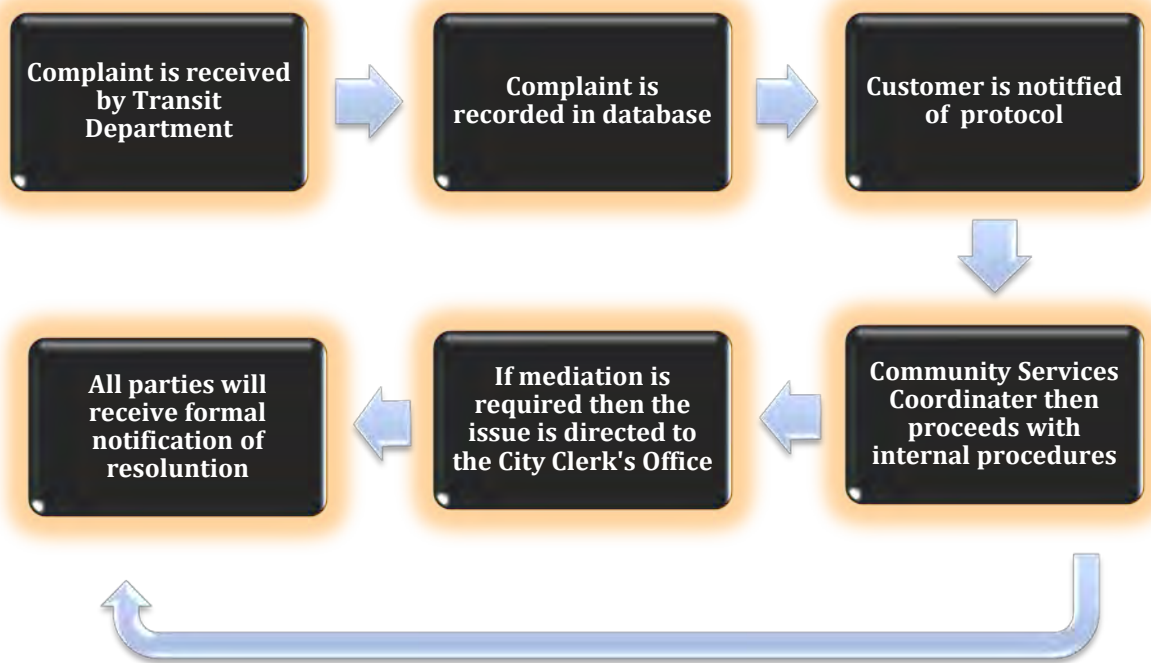
- Equal access to Dial-A-Ride services
- Proper notification on modifications pertaining to the services
- Encouraged public participation, regarding issues pertaining to Dial-A-Ride
- Easy access to information regarding Dial-A-Ride
- Ability to easily file a complaint, with the City of South Pasadena, should an incident occur pertaining to Title VI Rights

Residents are encouraged to utilize the resources afforded to them, by Title VI Rights. Should a patron or resident have issues or concerns regarding these or any other rights, they should contact the Community Services Department at 626.403.7360, or City Hall at 626. 403.7200.



## Filing A Formal Complaint:

The City of South Pasadena is dedicated to protecting the rights of its constituents. Thus, the Transit Department has taken precautionary measures to ensure that its residents (who qualify for the Dial-A-Ride program) receive exemplary service. The Division has recently updated its employee handbook, highlighting the expectations of its transit employees. Moreover, this section of the handbook outlines the actions that employees will take when a complaint pertaining to race, color, or national origin is filed with Transit. Below is a general outline of our process and procedures:



### Process & Procedures:

All complaints are of concern to the City of South Pasadena, Dial-A-Ride. Complaints related to Title VI of the 1964 Civil Rights Act are of the utmost importance. South Pasadena understands that a swift resolution to these matters starts with access to complaint forms. Therefore, the City has made the *Civil Rights Complaint Form* available on its City website. Per the Four Factor Analysis, this form is available in English, Spanish, Chinese, and Korean. To accommodate those with no or limited internet access, the Transit Department will have hard copies of the complaint form at their main office, as well. All employees are aware of where and how patrons may access these forms and are instructed to direct those who wish to file a complaint to the pre-designated places.

Once a complaint has been filed with the Transit Division, it is the responsibility of the Transit Coordinator to ensure a resolution, be it within the Division or through a third party mediator; which the City of South Pasadena can provide through its City Clerk's Office. The Transit Coordinator is obligated to document all complaints received and input them into the Division's database. The Transit Coordinator will then proceed to reach out to the resident, who filed the complaint, and notify them of any next steps and procedures. It is up to the Transit Coordinator to provide the necessary information to constituents; however information pertaining to complaint protocol is also located on the City's website.

After the Transit Coordinator reaches out to the parties involved he/she is tasked with working within Division policies and procedures to reach a rational and fair decision, in compliance with Local, State, and Federal Laws. Should he/she not be able to resolve the issue, the Coordinator will then present the issue to the Community Services Director, for assistance. If need be, the Community Service Director will consult legal council to determine a suitable solution.

While it is the Division's priority to resolve all issues within a timely fashion, The City of South Pasadena is prepared to extend any additional services, such as a third party mediator. If an issue should arise that warrants third party mediation, the Transit Coordinator will relinquish the case to the City Clerk's Office. It will then be the responsibility of the City Clerk to provide the necessary resources to resolve the situation. Should the issue reside with the City Clerk's Office, the process and procedures imparted by the City of South Pasadena and enacted by the City Clerk's Office will supersede the Transit Division's protocol.

Once an outcome has been decided all parties involved will be notified. Depending on the decision, the Transit Division, under the City of South Pasadena, will make any requested changes in compliance with Local, State, and Federal Laws. Aside from adopting any changes, the Division will also amend all handbooks.

**Time Frame for complaints:**

- A patron has 60 days from the time of the incident to file a complaint with the City of South Pasadena.
- A representative of the City of South Pasadena will contact the patron within 48 hours from the time the complaint was filed.
- A detailed investigation will occur after the review of the complaint and may take up to 30 days to resolve.



**The City of South Pasadena**  
**Civil Rights Complaint Form**

The Title VI of the 1964 Civil Rights Act and related nondiscrimination statutes and regulations require that no person in the United States shall, on the ground of race, color, or national origin be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance. The City of South Pasadena, like all other local governmental entities, is also prohibited from discrimination based on sex, age, disability, religion, marital status, or sexual orientation.

In addition to utilizing the Civil Rights complaint process here in South Pasadena, a Complainant may file a Title VI complaint concerning race, color, or national origin discrimination with the Federal Transit Administration (FTA), Office of Civil Rights, Region IX, 205 Mission Street, Suite 1850, San Francisco, California 94105-1839. A Complainant may file an Amicus with Disabilities Act (ADA) complaint with the FTA, Director, FTA Office of Civil Disabilities Act (ADA) Complaints with the FTA, Director, FTA Office of Civil Disabilities Act (ADA) Complaints, 1200 New Jersey Ave., SE, Washington, DC 20590. Complainants may also contact the FTA ADA Assistance Line, 1-800-445-4511 (TDD) or through the Federal Internet Relay Service, 1-800-877-8378 or by electronic mail at [FTA.ADAComplaints@fta.gov](mailto:FTA.ADAComplaints@fta.gov). The FTA ADA Complaint form is available at [www.fta.gov/ada-complaint-form](http://www.fta.gov/ada-complaint-form).

The following information is necessary to assist us in processing your complaint. Should you require assistance in completing this form, please call us at:

Complete and return this form to: Title VI and ADA Customer Assistance, 1123 Oakley Street, South Pasadena, CA 91080

1. Complainant's Name: \_\_\_\_\_
2. Address: \_\_\_\_\_
3. City, South Pasadena State: California, Zip Code: \_\_\_\_\_
4. Telephone Number (Home) \_\_\_\_\_ (Business) \_\_\_\_\_
5. Person discriminated against (if someone other than the Complainant):  
 Name: \_\_\_\_\_

Address: \_\_\_\_\_  
 City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

6. Check all of the following that describe the reason you believe the discrimination took place? Was it because of you?

a. Race  b. Color  c. National Origin   
 d. Sex  e. Age  f. Disability   
 g. Religion  h. Marital Status  i. Sexual Orientation

7. What date did the alleged discrimination take place? \_\_\_\_\_

8. In your own words, describe the alleged discrimination. Certain acts happened and where you believe were responsible. Please use the back of this form if additional space is required.

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

Complainant's Signature: \_\_\_\_\_ Date: \_\_\_\_\_

**Title VI Act of 1964 Civil Rights Lawsuits:**

After investigation, of the past three years, into the City of South Pasadena's Transit Division it is evident that there are not any complaints of the Title VI nature, currently in arbitration. Moving forward, in an effort to consolidate and streamline its processes, complaints pertaining to Title VI will be logged into one central database.



## **Public Participation & Public Forums:**

Under Title VI of the 1964 Civil Rights Act the City of South Pasadena is prepared to provide its Dial-A-Ride patrons with various forums. These meetings will be used as platforms to exchange information, ideas, grievances, and concerns. The City of South Pasadena recognizes the importance of feedback, especially from its target service population. Therefore, the City will make every effort to ensure that these meetings are easily accessible to its customers. While there are not any standing public forums to address these concerns, the City has in place procedures to streamline these events and guarantee that they can and will take place, should an occasion warrant it.

### **Reasons for Public Forums**

*Public forums will be held after necessary major modifications are made to the Dial-A-Ride program. The sole purpose of public forums is to give residents the opportunity to supply Transit with immediate feedback regarding changes to the service.*

- Fare increase
- Modification in collection of fare
- Alterations to the application process
- Extension of Dial-A-Ride services hours and possibly days
- Adjustments to the pre-approved destinations outside the City limits (*Note that Dial-A-Ride does not have a fixed route, but approved destinations*)

### **Reasons for Public Participation Forums**

*Public participation forums will be held prior to any minor modifications to the Dial-A-Ride program. The following are examples for Participation Forums:*

- Application of new rules or regulations
- The modifications of vehicles or the purchase of new vehicles
- Enhancements in processes and procedures of the overall program

### **Process and Procedures for Public Forum**

#### **Public Notice:**

Sufficient notice will be given to patrons, prior to any public hearing. The City of South Pasadena will include both patrons and the general public regarding these notifications. The City will not only send out mailers to patrons, in the appropriate languages, but will also post these notifications on the City website, as well. In addition, flyers regarding information on the hearings will be posted at the Senior Center (a place often frequented by Dial-A-Ride patrons) as well as at City Hall. Lastly, public hearings notices will be placed on the vehicles themselves, to further

guarantee those using the services are aware of and can make appropriate accommodations should they chose to attend.

To ensure that every effort is made to not only engage patrons, but also the public at large, the City will post the following information in the local newspaper: time, date, location, and purpose of meeting. Furthermore, South Pasadena will utilize its resources with local non-profits and community service centers to endorse public participation and ensure a higher rate of engagement.

**Date & Time:**

Should an occasion arise where a public forum, of either kind, is required, the City of South Pasadena will provide its patrons with a one-month's notice prior to the meeting date. Moreover, the Community Transit Division, under the City of South Pasadena, will chose a date and time most appropriate for its customers to attend the public hearing. All dates and times will coincide with the coordination of transportation, since its clientele will undoubtedly need assistance. Thus, all public hearings will occur during Dial-A-Ride scheduled hours (Monday – Friday, 8am – 5pm). Furthermore, in an effort to ensure maximum participation, the Transit Division will be mindful of holidays, both federal and religious, when securing a time, date, and location.

**Transportation:**

The Transit Division understands that this unique population, which Dial-A-Ride serves, will require special accommodations to attend public forums. Therefore, transportation to these meetings is factored into the internal logistics of public forums. Dial-A-Ride's specialized vehicles will allow those with various handicaps to move from their place of residence to the public forums, with ease. Furthermore, the trained Transit Drivers will guarantee their safe arrival and departure.

**Location:**

The City of South Pasadena is a small and quaint town. Location for meetings, anywhere in the City, will only take minutes for residents to reach. While there is ample meeting space for public hearings, it is under advisement that all meetings of such nature be held at the Senior Center, located at 1102 Oxley Street in South Pasadena. The logic behind this is two-fold; first, it is the same location in which the Dial-A-Ride offices are located. Second, the Center is most accommodating both in space and accessibility for the program's target population. The facility offers wheelchair ramps and accommodating restrooms, overall this facility can provide a level of comfort in which the target service population is accustomed to having.

However, depending upon the nature of the public forum, it may be determined by the Community Services Director to change locations. The City of South Pasadena is able to offer an array of facilities in which a public forum can be held and will be able to properly accommodate the unique needs of every forum.

## **Translators:**

In accordance with Title VI of the 1964 Civil Rights Act and related nondiscrimination statutes and regulations, which require that no person in the United States shall, on the ground of race, color or national origin be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance, the City of South Pasadena has, on staff, translators for their identified English as a Foreign Language (EFL) populations. These translators are fully employed by the City of South Pasadena and are obtainable with proper notice.

Translators for the purpose of public forums will be used for the following:

- Translations of flyers and other documents announcing information regarding the forum
- Support with community inquiries pertaining to public forums
- On-site the day of forums for translation purposes

Again, the purpose of translators is to secure participation and utilize human capital and other resources to inform residents and encourage their participation.

## **Past and Present Outreach:**

In the past the City of South Pasadena made every effort to keep its patrons, of the Dial A Ride service, abreast on any impending changes to the program. Flyers were placed in every vehicle that transported riders. Furthermore, each patron received a letter notifying them of modifications.

### **Past Outreach efforts:**

- December 2012 – Mailers were sent out and flyers were posted to inform patrons of the discontinuation of weekend services.
- September 2013 – Flyers were posted in each van stating the alteration in service hours from 8am - 6pm to 8am – 5pm.

## **Next Steps:**

Moving forward, the City of South Pasadena will provide a platform in which each patron regardless of race or national origin is able to effectively communicate any concerns that may be imposed upon them, should there be changes to the program. This will allow the Transit Division to gain further insight and feedback on how to effectively and efficiently update its program without imposing on patrons civil rights, as it pertains to them under Title VI of the 1964 Civil Rights Act.

While the Department does not foresee any major alterations to the program it still understands the importance of public forums. These public platforms will not only be utilized to inform but also to obtain the necessary feedback and insight to enhance Dial-A-Ride Services.



## Language Assistance Plan:

The City of South Pasadena is committed to ensuring that all residents and patrons of the Dial-A-Ride program receive equal access and fair treatment, when utilizing the service. Thus, a language assistance plan has been devised to further secure and protect the civil rights, of its patrons.

The first part of the language assistance plan incorporates the Four-Factor Analysis, as a means of understanding the City of South Pasadena's target population. Overall, the Analysis was utilized to understand the following:

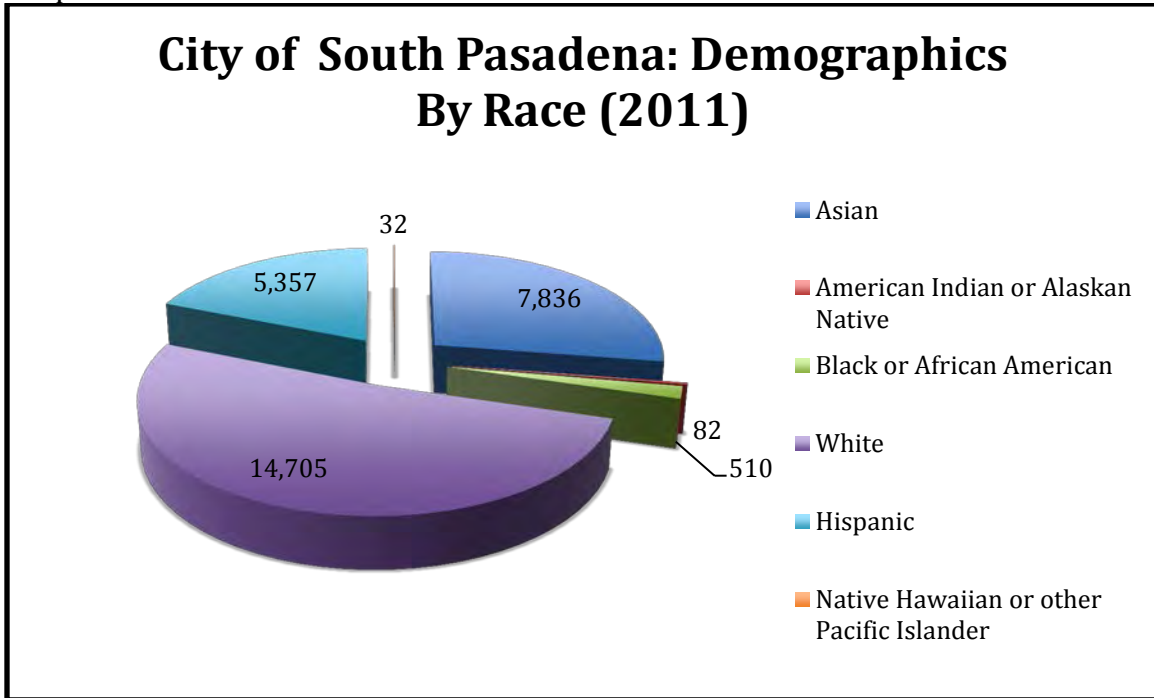
- The number or proportion of Limited English Proficiency (LEP) persons eligible to be served or likely to be encountered by Dial-A-Ride
- The frequency with which LEP persons come into contact with the services
- The significance of the City's services
- Resources available to the City for LEP outreach



**Factor 1:**

According to the United States Census Bureau, the total population of the City of South Pasadena is estimated at 25,465, as of 2011. Below is a breakdown of the City by Race.

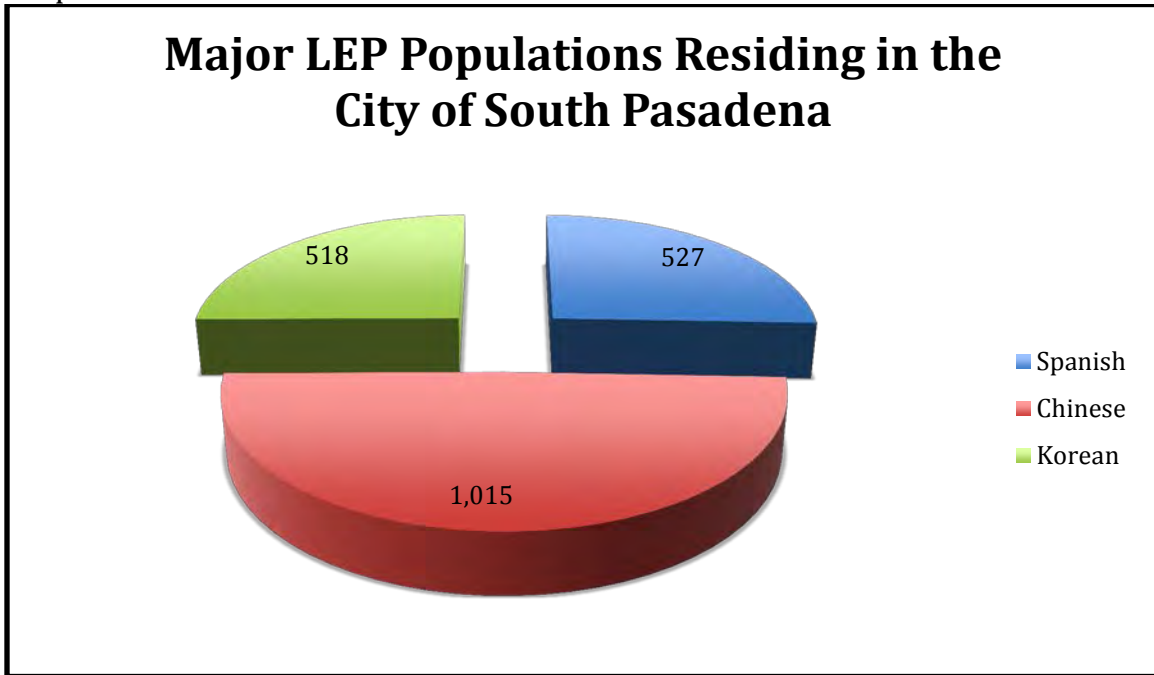
Graph1.1



Notably, there are three different languages spoken by South Pasadena’s Asian population; they are Japanese, Chinese, and Korean. The most prominent languages among the Asian community are Chinese and Korean. While the Hispanic population includes Mexicans, Cubans, and Puerto Ricans, the variance in the Spanish dialect is nominal and does not warrant separate translators for each ethnic group.

From the breakdown of the general population in graph 1.1, the following graph depicts the major LEP languages spoken within the City of South Pasadena.

Graph 1.2



**Major interactions with the Dial-A-Ride program:**

Those who qualify for Dial-A-Ride services interact directly with the agency’s employees. Services provided to patrons are on an as need basis. Those who qualify must sign-up for the services, either through an online application or in-person, at the Senior Center. Appointments for Dial-A-Ride must be made at least one day in advance, either via telephone or in person. Furthermore, all patrons interact on a one-to-one basis with the Dial-A-Ride drivers; who adhere to strict policies and procedure to ensure passengers are safe at all times while utilizing the service.

**Effective means of communication:**

After careful research the LEP population that could potentially be served by the City of South Pasadena’s Dial-A-Ride service is minimal. Approximately less than ten percent (10%) of the LEP population qualifies for Dial-A-Ride services, according to the U.S. Census Bureau. While the numbers are nominal for language assistance, the City of South Pasadena is dedicated to ensuring that residents, who qualify for the Dial-A-Ride service, are not excluded from participating due to race, color, or national origin. Therefore, application forms will be translated into the identified LEP languages listed above.

Notably, Graph 1.2 above shows a high Chinese LEP population. It should be noted that the information obtained by the United States Census Bureau did not discriminate on age, therefore the information depicts anyone five or older who self-identified their language of preference. Thus, the number of people from the Chinese



LEP population (and all other aforementioned populations listed in the graph who qualify for Dial-A-Ride services) will vary.

After careful consideration, in an effort to effectively communicate with its patrons, the City will translate the following documents for public consumption:

- Complaint forms
- Dial-A-Ride applications
- Public service announcements
- Title VI documents.

### **Insuring inclusion and taking a look back:**

Detailed examination of the LEP population served by the program suggests that no persons partaking in the Dial-A-Ride program is underserved in regards to their race, color, or national origin. The City of South Pasadena's Transit Division's bi-lingual staff and their ability to incorporate other prominent languages into its application process, complaint process, and other facets of the Dial-A-Ride program allow for the inclusion of all of its residents. Furthermore, the City has taken precautionary measures by training its staff to handle customers with various needs, including those with physical handicaps.

### **Factor 2:**

#### **How often does transit encounter LEP customers:**

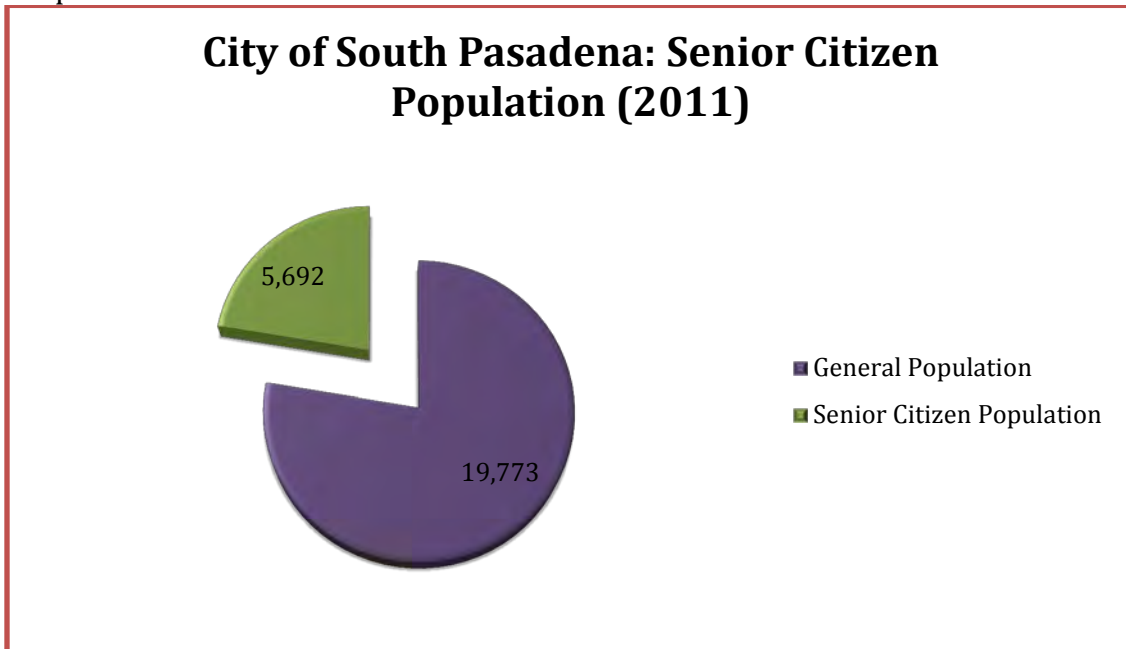
After researching Dial-A-Ride's database and interviewing its staff, the following results were yielded: The majority of LEP persons who seek Dial-A-Ride services are of Hispanic origin and prefer Spanish as their primary language for communication. The total number of LEP patrons that require assistance is 1.5 percent of the current Dial-A-Ride population. Currently, there are 1,766 people enrolled in the program. However, of the 1,766 people only 532 actively use the service. The frequency in which the identified LEP customers interact with the program is pretty high and the City of South Pasadena continuously works to meet the demands enacted upon them, by LEP riders. While there is frequent ridership of LEP persons, there is not a high demand from LEP people regarding: applications, customer service, ridership surveys, or operator surveys. However, should there be a shift in demographics and the need be prevalent for language assistance within the Dial-A-Ride program, the City of South Pasadena will reassess its resources and fulfill the needs of its customers based on demand.

**Identification of LEP communities and determining the appropriate language services for each language group:**

Assessment and identification has been done on a person-by-person basis, upon receiving applications. For future reference, the City of South Pasadena will place boxes for Spanish, Chinese, and Korean as a preferred language of choice option on Dial-A-Ride applications; for which each applicant can then choose which language they desire to use as a means of communication with Dial-A-Ride employees. While Spanish is actually the prevalent LEP language, the City does not want to exclude any potential customers from applying and has thus chosen a more inclusive application, which will feature all three-language options. All information will be saved in the Dial-A-Ride database, whereupon it will be analyzed and utilized to best meet the needs of its patrons. The City of South Pasadena strives to ensure that all Dial-A-Ride customers have equal access to the services and works diligently to accommodate their patrons.

The next graph conveys the population of the City by age, or rather shows that of the whole population, roughly twenty-four percent (24%) are of age to qualify for Dial-A-Ride services. Please note that the graph only shows the age of those that qualify and not those with disabilities, who could also possibly qualify for Dial-A-Ride services.

Graph 1.3



### **Factor 3:**

#### **The nature and importance of the program, activity, or service provided by the program to people's lives:**

Dial-A-Ride provides transportation services for seniors who are 55 years and older and those with disabilities (with proper medical notification). Its services on a daily basis range from everyday tasks, such as going to the grocery store, to essential to life medical appointments, such as dialysis. Understanding the wide-range of services and the needs of the population, Dial-A-Ride has prioritized its customers. The Division's overarching rule is when booking appointments priority is given to customers who have medical appointments. Overall, the hours of operation and the number of buses and drivers available are such that the Division can effectively meet the needs of its customers. This is not a fixed route service, which allows for flexibility and strategic planning in getting the patrons to their desired destinations.

### **Factor 4:**

#### **The resources available to the recipient for LEP outreach:**

There are various outlets currently available for outreach. The City website is a vital resource for the Dial-A-Ride community and South Pasadena residents who wish to sign-up for services. Due to the community's quaint size, mailers have proven to be another effective means of dissemination of information. Overall, cost associated with outreach is currently folded into the Division's general budget. Likewise, any translation for outreach is covered through employees' salaries and would not require any additional payment. Lastly, to make every effort to meet the needs of these passengers, the City of South Pasadena has hired bi-lingual staff.

To summarize the resources utilized by the City of South Pasadena to encourage full participation by its residents with the Dial-A-Ride service are:

- Bilingual Staff
- Flyers placed in strategic areas
- Mailers regarding information about the program, etc.
- Public forums in support of resident feedback

#### **Plan of Action: Tools and Resources for Resident Engagement with Dial-A-Ride**

After extensive research and the results of the Four-Factor Analysis, the City of South Pasadena's Dial-A-Ride service has internally restructured its Transit Division to better accommodate the needs of its patrons. By identifying the resources and tool and understanding the needs of its residents, the City of South Pasadena has clearly outlined a plan of action to engage its residents in meaningful participation of the Dial-A-Ride program. Moving forward, the City will:

- Incorporation of major Transit forms will be available in the identified Four-Factor Analysis languages
- Employees within the Transit Division are and will be well versed in targeted languages to ensure quality customer service
- Documents pertaining to updates or alterations to the program will be made easily accessible and available in LEP appropriate languages
- Transit website will have translation capabilities

Most of these items are already in place. The plan of action will be fully applicable in February 2014.

### **Employee Insight: Improving Customer Service**

- Ensure that the appropriate bilingual employees are paired with the appropriate LEP passengers; or offer language assistant resources to employees that will guarantee clear and concise communications with passengers
- When posting information regarding services, in vehicles, post multiple flyers in the identified LEP languages; All flyers should have a number that will direct the passenger to customer service agents that will be able to assist them in their preferred language
- Train employees thoroughly on customer service when encountering an LEP passenger; as well as offer language assistance training/courses

The aforementioned are customer service improvement suggestions. It should be noted that some practices, above, are already in place and used by the Transit Division.

### **Moving Forward: Staying In tune with the City's demographics**

While the City of South Pasadena has placed every resource and tools available to assist it's current residents, the City does recognize the possible shift in demographics in the future. Thus, the Transit Department will do a yearly assessment of its LEP population. The assessment will be constructed to inform Transit Division of the following:

- Major shift in demographic, in which the other unidentified populations require LEP assistance; or a current identified LEP population decreases and no longer requires LEP assistance by Transit Division
- Assessment of best LEP practices; to include post event evaluation
- Community involvement and outreach assessment and best practices

**Additional Comments:**

- Please note: the City of South Pasadena did not use FTA funds for the construction of any facility, pertaining to its Transit Division
- Additionally, the City of South Pasadena does not have a non-elected transit board
- All materials pertaining to filing a complaint, including a description of the entire complaint process, can be found on the City's website

## Contact Information:

For more information regarding the City of South Pasadena's Civil Rights Compliance manual please contact the Transit Division at 626.403.7368.

