

ATTACHMENT



Title VI Compliance Policy

Effective September 30, 2020

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I. INTRODUCTION

The City of Paramount provides transit services to its community. It is required to update Title VI Program as required by the Federal Administration (FTA) and to further ensure that the level and quality of its transit services are provided pursuant to Title VI of the Civil Rights Act of 1964. That is:

“No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participating in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.” (42. U.S.C. 200d)

II. POLICY STATEMENT

The City is a recipient of federal funds for transportation. It is the policy of the City of Paramount to ensure compliance with Title VI of the Civil Rights Act of 1964, as amended; 42 USC 2000(d); related statutes and regulations to the end that no person shall, on the grounds 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 Paramount strictly forbids and will not tolerate actions that intimidate, threaten, coerce, or discriminate against any individual for the purpose of interfering with any right or privilege secured by Title VI, or because he/she has made a complaint, testified, assisted, or participated in any manner in an investigation, proceeding, or hearing under this policy.

This program has been prepared in accordance with Section 601 of Title VI of the Civil Rights Act of 1964 and Executive Order 13116 (Improving Access to Services for Persons with Limited English Proficiency).

The City Manager is the designated Title VI Compliance Manager for the City of Paramount. For questions, concerns, complaints, or requests for additional information regarding the City of Paramount’s Title VI policy contact:

**City of Paramount
John Moreno
City Manager
16400 Colorado Avenue
Paramount, CA 90723
Email: JMoreno@paramountcity.com
Phone: (562) 220-2222**

III. PURPOSE

This policy ensures that the City of Paramount's transportation program (including fees, routing, scheduling, and quality of transportation services) are operated without regard to race, color, national origin, sex, age, disability, religion, medical condition, marital status, or sexual orientation.

The program that follows is designed to conform to FTA C 4702.1B circular that was disseminated October 1, 2012. This program contains all of the elements required by the U.S. Department of Transportation Federal Transit Administration of a transit provider operating in an urbanized area.

IV. GENERAL REQUIREMENTS

A. Annual Title VI Certifications and Assurances

The City of Paramount will submit its annual Certifications and Assurances to the Federal Transit Administration each year in accordance with the requirement to do so within 90 days from the date of the publication of the notice in the Federal Register or with the first grant application, whichever comes first.

B. Notification of Beneficiaries of Protection under Title VI

In compliance with 49 CFR Section 12.9(d), the City of Paramount has provided information to the public regarding its Title VI obligations and appraises members of the public of the protection against discrimination afforded to them by Title VI on an on-going basis. This statement of nondiscrimination on the basis of race, color, national origin, sex, age, disability, ethnic group, medical condition, or sexual orientation has been made available on the City of Paramount's website. The notice also includes contact information for requesting details to the City of Paramount Title VI obligations and the complaint procedure. The notice is in English and Spanish.

1. Title VI Policy on Website

"Website will be updated once City Council approves the Title VI Compliance Policy Update.

2. Notice to the Public of Rights under Title VI

This notice's intent is to make program participants aware of the City's commitment to Title VI compliance and of their right to file a civil rights complaint.

Notifying the Public of Rights Under Title VI

City of Paramount

The City of Paramount operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. In addition to Title VI the City also prohibits discrimination based on sex age, disability, ethnic group, or sexual orientation. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice may file a complaint with the City of Paramount.

For more information on City of Paramount civil rights program, and the procedures to file a complaint, contact (562) 220-2000, or visit us at 16400 Colorado Avenue, Paramount CA 90723.
 For more information, visit: <http://www.paramountcity.com>.

Notificar al público de los derechos bajo el título VI

City of Paramount

La Ciudad de Paramount opera sus programas y servicios sin considerar la raza, color y orígenes nacionales de la persona en acuerdo con el Título VI del Acta de los Derechos Civiles. Adicionalmente con el Título la Ciudad también prohíbe discriminación basado en el sexo, edad, incapacidades, grupo étnico, y orientación sexual. Cualquier persona que cree que él o ella ha sido agraviado por cualquier práctica discriminatoria ilegal bajo el Título VI puede presentar una queja con City of Paramount

Para obtener más información sobre el programa derechos civiles y los procedimientos para presentar una queja, llame al (562) 220-2000, o visítenos al 16400 Colorado Avenue, Paramount, CA 90723.
 Para más información, visite <http://www.paramountcity.com>.

3. Location of Title VI Policy Postings

Location Name	Address	City
City Hall	16400 Colorado Avenue	Paramount
Recreation Office	15300 Downey Avenue	Paramount
City Website	www.paramountcity.com	Web

C. Filing a Title VI Complaint

In compliance with 49 CFR Section 21.9(b), the following complaint procedure will be followed by the City of Paramount in the event that any person believes that he or she, individually, or as a member of any specific class of person, has been excluded from participation in, been denied the benefits of, or been subjected to discrimination on the basis of race, color, national origin, sex, age, sexual orientation, medical conditions, disability or income level with regard to:

- a) The availability and equitable distribution of transit services and benefits,
- b) The level and quality of transit services that are sufficient to provide equal access and mobility for all persons,
- c) The opportunity to participate in the transit planning and decision making process; and,
- d) The right to fair decision on the location of transit services and facilities.

Any person who believes he/she, or any specific class of persons, has been subjected to discrimination prohibited by Title VI may, by himself/herself or by a representative, file a

written complaint with the City of Paramount Title VI Compliance Manager, US Department of Transportation (USDOT) or the Federal Transit Authority (FTA) no later than 180 days after the alleged act of discrimination.

The complaint will be made in writing to the City of Paramount and will include all information relevant to a determination of discrimination. A complaint must be filed within 180 days of alleged discrimination. In cases where the complainant is unable or incapable of providing a written statement, the City of Paramount's staff will, if necessary, assist the person in converting the verbal complaints to writing and will interview the complainant. The complainant or his/her representative will sign all complaints. Written complaints may be sent to the City of Paramount, 16400 Colorado Avenue, Paramount, CA 90723 or an online Civil Rights Complaint Form may be accessed at the City of Paramount's website at www.paramountcity.com.

All complaints will be logged by the City Clerk and forwarded to the Community Services & Recreation Director. After review of the complaint, which will include, but not be limited to, interviewing the complainant, witnesses and all appropriate transit involved staff, review of video or audio recordings if available, review of transit program policies and service standards, the Title VI Civil Rights Compliance Manager will make a determination of discrimination. If it is found that discrimination did not occur, the complainant will be notified in writing and the procedure will be terminated. Notification will occur within ten (10) days of the original submission of the complaint. At that time the complainant will be advised of their right to challenge the decision of the Civil Rights Officer by submitting a written request for a hearing before the City Manager within five (5) days of the receipt of the determination.

The City's Title VI Compliance Manager will assign, oversee, track, and record a prompt investigation of the allegation(s) presented. The investigation will include, where appropriate, a review of the pertinent practices and policies of the City's Title VI Program, the circumstances under which the possible noncompliance occurred, and other factors relevant to a determination as to whether the City has failed to comply with Title VI. After the investigation has been completed, the Title VI Compliance Manager will transmit to the complainant and the alleged individual or organization one of the following letters:

- a) A letter of resolution that explains the steps that the City has taken or guarantees to take to come into compliance with Title VI.
- b) A letter of finding issued when the alleged individual or organization is found to be in compliance with Title VI. This letter will include an explanation of why the individual or organization was found to be in compliance, and provide notification of the complainant's right to appeal. If applicable, the letter can include a list of procedural violations or concerns, which can put the alleged individual or organization on notice that certain practices are questionable and that without corrective steps, a future violation finding is possible.
- c) A letter of finding issued when an individual or organization is found to be in noncompliance. This letter will include each violation referenced as to the

applicable regulations, a brief description of proposed remedies, notice of the time limit on the conciliation process, the consequences of failure to achieve voluntary compliance, and an offer of assistance to the individual or organization in devising a remedial plan for compliance, if appropriate.

D. Appeals Process

The letter of finding and resolution will offer the complainant and the alleged City individual or organization the opportunity to provide additional information that would lead the City of Paramount's Administrative Services Department (Title VI Compliance) to reconsider its conclusions. In general, the City's policy requires that the parties in the complaint provide this additional information within 60 days of the date the Letter of Finding was transmitted. After receiving and reviewing the information, the Title VI Compliance Manager will respond 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.

Complaint forms are available in English and Spanish on the City of Paramount's website. The forms are also available at City Hall and/or the office of Community Services & Recreation upon request. The general complaint procedure is available on the City of Paramount's website in English and Spanish. The detailed complaint procedure noted above will be made available to members of the public upon request. Provision will be made for persons with limited English proficiency.

The following documents are a sample, in English and in Spanish, of the complaint form that must be used to file a complaint with The City of Paramount.



Civil Rights Complaint Form

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 Gate also prohibits discrimination based on sex, age, disability, ethnic group, or sexual orientation.

In addition to utilizing the Civil Rights complaint process with the City of South Gate, 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, 201 Mission Street, Suite 1650, San Francisco, California 941051839. A Complainant may file an Americans with Disabilities Act (ADA) complaint with the FTA, Director, FTA Office of Civil Rights, East Building – 5th Floor, TCR, 1200 New Jersey Ave., SE, Washington, DC 20590. Complainants may also contact the FTA ADA Assistance Line, 1-888-446-4511 (Voice) or through the Federal Information Relay Service, 1-800-877-8339 or by electronic mail at FTA.ADAAssistance@dot.gov. The FTA ADA Complaint form is available at http://www.fta.dot.gov/civilrights/12875_14818.html.

The following information is necessary to assist us in processing your complaint. Should you require assistance, please let us know.

Complete and return this form to: City of Paramount City Clerk's Office, 16400 Colorado Avenue, Paramount, CA 90723.

1. Complainant's Name: _____
2. Address: _____
3. City: _____ State: _____ Zip Code: _____
4. Telephone Number (home): _____ (business): _____
5. Person discriminated against (if someone other than the Complainant):
 Name: _____
 Address: _____
 City: _____ State: _____ Zip Code: _____



Formulario Para Quejas Sobre Derechos Civiles

El Título VI de la Acta de Derechos Civiles de 1964 (Title VI of the 1964 Civil Rights Act) u otros estatutos y regulaciones referente a la no discriminación, requieren que ninguna persona sea excluida de participar o ser negada beneficios a servicios, o ser discriminado bajo cualquier programa o actividad que recibe asistencia financiera federal basado sobre su sexo, edad, incapacidad, grupo étnico o orientación sexual.

Además de utilizar el proceso de quejas de Derechos Civiles de la Ciudad de Paramount, un querrelante puede poner un queja Título VI (Title VI) referente a raza, color de piel, u origen nacional con la Administración Federal de Tránsito (Federal Transit Administration (FTA)), Office of Civil Rights, Region IX, 201 Mission Street, Suite 1650, San Francisco, CA 94105-1839. El querrelante puede poner un queja con la organización de Acta de Americanos con Incapacidades (ADA), dirigiéndose al FTA Director, FTA Office of Civil Rights, East Building, 5th Floor, TCR, 1200 New Jersey Avenue SE, Washington DC 20590. Querrelantes pueden dirigirse a la línea de asistencia, (FTA ADA Assistance Line), 888-446-4511; para los que tienen problemas con audición, pueden llamar al Federal Information Relay Service, 800-877-8339, o por correo electrónico a FTA.ADAAssistance@dot.gov. El Formulario de Queja FTA ADA, está disponible en la página web: http://www.fta.dot.gov/civilrights/12875_14818.html.

La siguiente información es necesaria para asistirle en el procedimiento de su queja. Déjenos saber si necesita ayuda.

Llene y regrese este formulario a: City of Paramount City Clerk's Office, 16400 Colorado Avenue, Paramount, CA 90723.

1. Nombre del Querrelante: _____
2. Domicilio: _____
3. Ciudad: _____ Estado: _____ Zona Postal: _____
4. Teléfono (Casa): _____ (Negocio): _____
5. Información de la persona discriminada (Si es alguien más que el querrelante):
 Nombre: _____
 Domicilio: _____
 Ciudad: _____ Estado: _____ Zona Postal: _____

6. Which of the following best describes the reason you believe the discrimination took place? Was it because of your:

- Race
- Color
- National Origin
- Sex
- Age
- Disability
- Sexual Orientation

7. What date did the alleged discrimination take place? _____

8. In your own words, describe the alleged discrimination. Explain what happened and whom you believe was responsible. Please use additional sheets if more space is required.

9. Have you filed this complaint with any other federal, state, or local agency; or with any federal or state court?

- Yes
- No

If yes, check each box that applies:

- Federal Agency
- Federal Court
- State Agency
- State Court
- Local Agency

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

Name: _____
 Address: _____
 City: _____ State: _____ Zip Code: _____

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

Complainant's Signature _____ Date _____

6. ¿Cuáles de las siguientes describen la razón por la cual usted cree que se le fue discriminado? Fue por su:

- Raza
- Color de Piel
- Origen Nacional
- Sexo
- Edad
- Incapacidad
- Orientación Sexual

7. ¿Cuál fue la fecha del presunto acto de discriminación? _____

8. En tus propias palabras, describe el presunto acto de discriminación. Explica que paso y quien usted piensa fue responsable. Por favor use hojas adicionales si requiere más espacio.

9. ¿Has presentado documentación de esta queja con cualquier otra agencia federal, estatal, o local; o con una corte federal o estatal?

- Si
- No

Si contestaste si, marca las casetillas que apliquen:

- Agencia Federal
- Corte Federal
- Agencia Estatal
- Corte Estatal
- Agencia Local

10. Por favor provee la información sobre una persona para contactar en la agencia/corte adonde fue presentada la queja.

Nombre: _____
 Domicilio: _____
 Ciudad: _____ Estado: _____ Zona Postal: _____

11. Por favor firme abajo. Usted puede agregar cualquier material por escrito o información que usted piense sea pertinente a su queja.


Firma Del Querrelante _____ Fecha _____

E. Recording Title VI Investigations, Complaints, and Lawsuits

In order to comply with 49 CFR Section 12.9(b) the City of Paramount will prepare and maintain a list of any active investigations conducted by the City of Paramount or any other entities other than the FTA, lawsuits, or complaints naming the City of Paramount and/or its subcontractor(s) that allege discrimination on the basis of race, color, or national origin. This list will include:

- a) The date the investigation,
- b) A summary of the allegation(s),
- c) The status of the investigation, lawsuit, or complaint; and,
- d) Actions taken by the City of Paramount or subcontractor in response to the investigation, lawsuit, or complaint.

The City of Paramount has not been the subject of any investigations, complaints or lawsuits in the last three years. The following is a sample of the log sheet used to maintain a list of active complaints:



Title VI Investigation, Complaints, and Lawsuits- Log Sheet

Name of Complainant	Date of Complaint	Details of Complaint	Date Report was Submitted	Follow Up Date	Was the Matter Resolved? Yes/No

F. Membership of Non-Elected Committees and Councils

The City of Paramount does not have an appointed Commission to oversee the City's transportation program. Paramount's City Council, an elected body, serves as the decision making body on all transit matters.

G. The City of Paramount's Resolution Approving Title VI Program

The Title VI Plan was presented to and approved by the City of Paramount's City Council meeting on September 15, 2020.

H. Provision of Additional Information to the FTA

The City of Paramount will provide the FTA additional information upon request. Such information may be related, but not limited to, investigation of complaints or discrimination or to resolve concerns about possible noncompliance with Title VI. In addition, the City of Paramount will submit this plan to the Los Angeles County Metropolitan Transportation Authority (METRO) as the pass-through agency for FTA. An update to this Title VI Plan will be submitted every three years as required.

V. INCLUSIVE PUBLIC PARTICIPATION

The City of Paramount public participation strategy offers early and continuous opportunities for the public to be involved in the identification of social, economic and

environmental impacts of proposed transportation decisions. Engagement of the public in service planning and development is at the forefront of the responsive operation. The City of Paramount's ongoing public participation planning ensures that:

- a) Potentially affected community members will have an appropriate opportunity to participate in the decision making process,
- b) The concerns of all persons and groups participating in the process will be considered in the decision-making process; and,
- c) The City of Paramount will seek out and facilitate the involvement of those potentially impacted.

This Public Participation Plan outlines the importance of, and specific guidelines for, community engagement. The City of Paramount uses a variety of communication mechanism to ensure that all populations, those residing in minority census tracts and those living in non-minority census tracts, persons with low-income, persons with disabilities, and persons with limited English proficiency have an opportunity to participate in service development and changes.

A. Meeting and Information Access Accommodations

Most transit service hearings and decisions take, place at regularly scheduled City Council meetings which take place on the first and third Tuesday of each month in the Council Chambers.

In accordance with the Brown Act, the City of Paramount posts board meeting agendas at least 72 hours before a regular meeting. The agenda specifies the time and location of the meeting and is posted at City Hall and on the City's website; these locations are freely accessible to members of the public.

City Council meeting agendas include a general description of each item, and back up information when necessary. Members of the public are able to review the agenda and participate in the meeting during the "Public Comments" section. The public has the right to comment on any agenda item or non-agenda item prior to any decision or vote being made.

City Hall, where City Council meetings take place, serve well for providing public access as it is centrally located to all parts of the City and is served by a Long Beach Transit line and a Los Angeles Metro line. The City provides reasonable accommodations in accordance with the American with Disabilities Act of 1990. If special accommodations are desired at a City Council meeting, the public can call the City Clerk's office 48 business hours prior to the meeting to make reasonable arrangements to accommodate the request. Information regarding special arrangements is included in the City Council agenda. City Council meetings are wheelchair accessible.

The City complies with 49 USC Chapter 53, Section 5307 regarding public hearings for significant changes in services or transit fares. In these hearings, the City will provide

Spanish translation and may provide interpretation upon reasonable request for other languages, including sign language, with advanced notice.

The City also maintains good relationships with many of our local organizations, allowing us the opportunity to send transit staff out to attend meetings of local organizations to bring transit updates and receive feedback from any location where interested residents may gather. These include many independent community groups that meet in City operated facilities, but also groups who may meet in school facilities and local churches. These groups consist of cultural organizations, City partners, local businesses and other organizations vested in the City's service area.

B. Opportunities for Public Participation

1. Changes to Services & Fares

Although the City of Paramount does not anticipate making any service changes to its Transportation Program, the following are examples of when the public participation plan will be put in place:

- When a new or revised fare is introduced
- When the method of collecting fares is changed
- When a new route is introduced or an existing route is substantially reconfigured
- When an existing route is proposed to be eliminated
- When the frequency of service is modified
- If days and hours of service are proposed to be changed

All of the above instances would result in the full public participation process. Minor adjustments to a schedule or route would be posted thirty days in advance of any change.

Fares have not changed since Paramount in Motion was instituted February of 2019. In the event that a fare change is proposed, steps similar to the ones outlined below would be used:

- One month prior to Hearing Date
 - Notice of the intent to change fares listed on City website (English/Spanish)
 - Community meetings and workshops held in neighborhoods affected by transit-related projects
 - Announcements and briefings to local business groups, non-governmental organizations, and churches.
 - Information via the City of Paramount's social media pages and monthly mailed publication, the "Around Town."
 - Notice of Public Hearing as posters in English/Spanish in all City facilities
 - Distribution of Notice to all groups and individuals in stakeholder database

- 15 days prior to Hearing Date
 - Legal notice in our local newspaper, Paramount Journal.
- 1 week prior to Hearing Date
 - City Council Agenda is posted on City Website and at various City facilities in compliance with the Brown Act. Proposed rate change is listed under Public Hearings section.
 - Robo calls informing residents of Hearing Date.
- Public Hearing
 - Held at City Hall as part of a regular City Council meeting, Spanish translation provided
 - City Hall is centrally located and is within one block of a Long Beach Transit and Los Angeles Metro bus stop.

2. Transit Enhancements

Public participation will occur when improvements are being considered that would support the delivery of services. Examples would include:

- Installation of bus stop benches and shelters
- Changes to vehicles or operating equipment
- Establishing new policies for use of services

Public input would be sought in a manner appropriate to the nature of the changes and their potential impacts. Public outreach through the various methods indicated would be used to notify the public of the City's intent. If warranted, public input meetings would be held and, if needed, an advisory committee formed to gather and evaluate information and input. Surveys may also be conducted, either on-board or at drop-in locations.

3. Public Outreach Efforts

Depending on the type of service change that is contemplated, a variety of means will be employed to encourage public participation. The measures taken are targeted to overcome linguistic, institutional, cultural, economic, historical, or other barriers that may prevent minority and low-income people and populations, persons with disabilities and persons with limited English proficiency from effectively participating in the decision making process.

The potential for a change/enhancement to service/fares is a result of carefully evaluated data by appropriate City of Paramount staff and our contracted service provider. The data collection will not only include ridership and financial analysis but recaps of community conversations and recommendations with targeted groups or organizations. A proposal will then be developed internally and presented to the City Manager or Paramount City Council, depending on the extent and nature of the proposed changes. Once the proposal is accepted, the proposal will proceed to the public comment period.

Public outreach meeting locations, dates and times will be determined with consideration of the proposed changes and their impact on specific locations/populations within the City of Paramount Transit service area. The following will be considered in establishing those locations:

- Convenience and accessibility for minority, persons with disabilities and LEP communities;
- Size of venue should provide for meaningful dialogue; and
- Invite community organizations to help support public engagement strategies.

As many communication opportunities as possible should be used to seek public input. Such methods include:

- Handouts to passengers in both English and Spanish
- Announcements on City publications
- Notices on the City website in both English and Spanish
- Distribution of notices to various local community groups and partners
- Spanish speaking employees at meetings available to translate for persons with limited English proficiency.

Once the public comment period ends, all comments will be consolidated and carefully evaluated. A final recommendation will be made to the City Council for their final decision.

City staff will actively to seek to engage our community in promoting our transportation services and programs.

The City of Paramount public participation plan will be consistently applied. City staff will actively seek to engage our community in interpreting and promoting our transit services and programs. These efforts will include the following:

- Regular updates to the City website in English and Spanish.
- Information regarding our transit programs mailed to each household quarterly as part of our City's recreation brochure in both English and Spanish.
- Maintain a database of program users, participants and other interested parties to facilitate contacting these individuals when issues require input.
- Regular communications with local community groups and partners.

VI. LANGUAGE ASSISTANCE PLAN

The City of Paramount Language Assistance Plan incorporates all reasonable steps to ensure meaningful access to benefits, services, information, and other important portions of the City of Paramount's transportation program by providing an appropriate mix of language assistance measures so all residents, including individuals that are limited English proficient, can equally contribute to the ongoing improvement efforts of the City of Paramount's transportation service. Limited English Proficiency (LEP) individuals are

those who do not speak English as their primary language, and have limited availability to read, write, or understand English. It includes people who reported to the U.S. Census that they speak English less than very well, not well, or not at all. The plan has the following key elements:

- Identification of LEP individuals who need language assistance (using the four factor analysis that follows);
- Determination of the appropriate language assistance measures based on what is learned;
- Training of all employees regarding LEP policies and procedures;
- Providing notification to LEP persons of the language services offered by the City of Paramount transit program; and,
- Procedures to monitor and update the Language Assistance Plan.

As a first step, and in order to ensure meaningful access to programs and activities, the City of Paramount transit program uses the information obtained in a Four Factor Analysis to determine the specific language services that are appropriate. This analysis helps the City to determine if it communicates effectively with LEP persons and supports language access planning. This Four Factor Analysis is a local assessment that considers:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by the City of Paramount transit program;
2. The frequency with which LEP persons come into contact with the City of Paramount transit services and programs;
3. The nature and importance of the City of Paramount transit services and programs in people's lives; and,
4. The resources available to the City of Paramount transit for LEP outreach, as well as the costs associated with that outreach.

A. Four-Factor Analysis

1. The number or proportion of limited English proficient persons eligible to be served or likely to be encountered by the City of Paramount's transit program.

The first step in this process is to understand the proportion of limited English proficient persons who may encounter any of the services provided by the City of Paramount, their literacy skills in English and their native language, the location of their communities and neighborhoods, and if they are underserved as a result of a language or other socioeconomic barrier. For purposes of this analysis, those individuals over five years of age who self-identify as speaking English less than "very well" and reside in the City of Paramount service area of Los Angeles County, will be considered limited English proficient persons. Data for the review will include information from U.S. Census Bureau, 2014-2018 American Community Survey 5-Year Estimates.

Long Beach Transit operates local fixed-route services under an agreement with the City

of Paramount. American with Disabilities Act transit services such as our Medical Taxi, Dial-A-Ride and Elderly Nutrition Programs are operated by Administrative Cooperative Services, Inc. to our qualifying City of Paramount seniors and disabled residents.

The City of Paramount and its surrounding communities are predominately Hispanic with a high number of Spanish speaking residents as well as a lower than average education level in much of the population. According to the U.S. Census Bureau, 2014-2018 American Community Survey 5-Year Estimates, the City of Paramount has 92.9% of its residents identifying themselves as being born in Latin America. Of those, a total of 26.9% identified themselves as speaking English less than “very well”.

LANGUAGE SPOKEN AT HOME	Estimate	Margin of Error	Percent	Percent Margin of Error
Population 5 years and over	51,129	+/-480	51,129	(X)
English Only	12,592	+/-852	24.6%	+/-1.6
Language other than English	38,537	+/-801	75.4%	+/-1.6
Speak English less than "very well"	14,494	+/-710	28.3%	+/-1.4
Spanish	36,916	+/-826	72.2%	+/-1.6
Speak English less than "very well"	13,770	+/-737	26.9%	+/-1.5
Other Indo-European languages	244	+/-188	0.5%	+/-0.4
Speak English less than "very well"	106	+/-94	0.2%	+/-0.2
Asian and Pacific Islander languages	1,172	+/-250	2.3%	+/-0.5
Speak English less than "very well"	557	+/-169	1.1%	+/-0.3
Other languages	205	+/-167	0.4%	+/-0.3
Speak English less than "very well"	61	+/-50	0.1%	+/-0.1

Source: U.S. Census Bureau, 2014-2018 American Community Survey 5-Year Estimates

In addition, the City does not assume literacy with residents, particularly in the English language. According to the U.S. Census Bureau, 2014-2018 American Community Survey 5-Year Estimates, 22.4% of City of Paramount residents above the age of 25 have a 9th grade education or less. This combined with the high level of Spanish speaking residents leads to a high number of residents who do not easily read or write English.

Educational Attainment	Estimate	Margin of Error	Percent	Percent Margin of Error
Population 25 years and over	32,260	+/-624	32,260	(X)
Less than 9th grade	7,236	+/-547	22.4%	+/-1.6
9th to 12th grade, no diploma	4606	+/-443	14.3%	+/-1.4
High school graduate (includes equivalency)	8,682	+/-542	26.9%	+/-1.6
Some college, no degree	6,057	+/-507	18.8%	+/-1.5
Associate's degree	2,032	+/-292	6.3%	+/-0.9
Bachelor's degree	2,435	+/-285	7.5%	+/-0.9
Graduate or professional degree	1,212	+/-227	3.8%	+/-0.7
High school graduate or higher	20,418	+/-836	63.3%	+/-2.2
Bachelor's degree or higher	3,647	+/-351	11.3%	+/-1.1

Source: U.S. Census Bureau, 2014-2018 American Community Survey 5-Year Estimates

Due to the high density and small area (4.8 sq. mi) of the City of Paramount, there are few distinct geographic areas which define specific populations or higher concentrations of Limited English Proficiency populations. All parts of the city contain significant numbers of LEP populations and require staff that is bilingual in both English and Spanish and who are trained and sensitive to the needs to those who may have limited reading and writing skills in either language or both.

2. The frequency with which LEP persons come into contact with City of Paramount transit services and programs.

As is illustrated by the demographic information above, only two languages; English and Spanish are spoken with any frequency by City of Paramount residents. All City of Paramount office personnel as well as our contractor's dispatchers and drivers are required to be bilingual in Spanish and English.

To ensure continued collection of contacts, staff is required to report any contacts with LEP customers speaking any language besides Spanish. Staff will be asked to identify the language, if known, provide details of the information requested and the methods used to resolve the problem. This policy will be reinforced regularly as part of ongoing staff training.

3. The nature and importance of City of Paramount transit services and programs in people's lives.

The City of Paramount is a lower income community with an average per capita income level below County, State and Federal averages. According to the 2010 Census, the poverty rate in the City of Paramount is 18.7%. Approximately, 20.4% of the City of Paramount working population uses some method besides a personal vehicle to get to work. Many of those who do drive leave remaining family members without transportation to accomplish their daily tasks.

The City of Paramount is well served by Metro and Long Beach Transit routes, crisscrossing the City on major arterials and providing access to other nearby communities. To improve local and regional mobility for Paramount residents, the City of Paramount partners with Long Beach Transit (LBT), Administrative Services Cooperative, Inc., and Los Angeles Metro.

The City of Paramount's former Fixed Route and College Bound systems are now operated by Long Beach Transit. Fixed routes include: Route 21A & 21B, 22 and 71, all of which operate Monday-Sunday with available transfers to other Long Beach Transit routes and/or Los Angeles Metro. The City of Paramount's former College Bound Program now provides City of Paramount residents and Paramount Unified School District students/graduates with unlimited travel on Long Beach Transit and Metro bus routes to nearby campuses, through the Paramount University Pass (PUP) Card. LBT's Dial-A-Lift offers curb-to-curb, shared-ride transit service exclusively for those who are mobility impaired, reside in the City of Paramount, are at least 18 years of age, and are unable to board or access the LBT buses.

The City of Paramount's taxi-based services for in-town uses as well as out-of-town medical uses is now offered for eligible users. The taxi-based Medical Transit Program is designed to help elderly and disabled residents that need assistance going to approved out-of-town medical visits within a five mile radius for our elderly and disabled residents. The City of Paramount's taxi-based Dial-A-Ride Program is designed to help elderly and

disabled residents that need assistance going to approved locations within the City, such as; retail shops, government facilities and medical offices within the City of Paramount. The City of Paramount taxi-based Elderly Nutrition Transit Program is designed to help elderly residents to get to and from our Senior Center at no cost for a maximum of 40 trips per month.

4. The resources available to the City of Paramount for LEP outreach, as well as the costs associated with that outreach.

Financial resources available within the current budget for marketing to or communicating with LEP persons in their language are minimal. However, because the Spanish speaking population has a significant presence in the City of Paramount's transportation demographics it has been important to offer material in a format that are easily understood by this identified population. These materials include:

- a) Spanish outreach materials
- b) English/Spanish signage
- c) English/Spanish brochures
- d) English/Spanish flyers
- e) English/Spanish letters sent home
- f) English/Spanish reverse 911 calls
- g) English/Spanish social media posts
- h) Bilingual staff in English and Spanish, allowing them to comfortably and naturally provide assistance in both languages.

The costs associated with this customer service are part of the on-going budget for marketing. These language services are seen as a normal part of business by most of the City's departments and are an expected cost and service required in order to properly serve our community.

B. Language Assistance Measures

Language assistance measures currently used or planned to be used by the City of Paramount to address the needs of Spanish-speaking LEP persons include the following:

- Vital documents including the Civil Rights Notice, Title VI Complaint Form, and Title VI Complaint Procedures translated into Spanish, the predominate language of the ridership serviced by the City of Paramount's transit program.
- Translating all transit related marketing materials into Spanish
- If needed, arranging for availability of oral translators.
- Interactive meeting material to engage limited English proficient individuals in the planning process
- Posting notices in the native language informing limited English proficient persons of available transportation services and opportunities for limited English proficient to provide input.

- Network with local community service organizations that provide services to LEP individuals and seek opportunities to provide information on the City of Paramount's programs and services.

When an interpreter is needed, for a language other than Spanish, in person or on the telephone, staff will attempt to access language assistance services from a professional translation service, Continental Interpretation, or 211 LA County.

The City of Paramount remains committed to ongoing improvement with language assistance measures to ensure equitable treatment to the population serviced by the transportation program. The City of Paramount will continue to monitor limited English proficient public contacts and reinforce with staff to report any limited English proficient contacts beyond Spanish.

C. Training Staff

Training is an ongoing activity. A reaffirmation of the entire Title VI policy will be issued to all staff and new hires. The implementation of the City of Paramount's LEP program will be a part of the normal customer service training. The following steps will be taken:

- Information on the City of Paramount Title VI procedures and LEP responsibilities.
- Description of language assistance services offered to the public.
- Documentation of language assistance requests to track trends and access.
- Training on how to handle potential Title VI/LEP complaints.

D. Providing Notice to LEP Persons

As noted, LEP persons will be notified of the language services available by:

- Providing signage when free language assistance is available with advance notice.
- Stating in outreach documents that language services are available from the City. A notification of services in Spanish (i.e. tag line) when full translation of the document is not available.
- Working with community-based organizations and other stakeholders to inform LEP individuals of recipient's services, including the availability of language assistance.
- Telephone calls during work hours that are made in Spanish will be assisted with a Spanish-speaking staff member.
- Reverse 911 messages to targeted city populations are made in English and Spanish.
- Providing presentations and/or notices at schools and religious organizations.

E. Monitoring, Evaluating, and Updating the Plan

The City of Paramount's Title VI Plan will continue as an active planning tool. As such, tools for feedback and data collection have been put in place as outlined above. The plan will be reviewed annually using the data and feedback received. Minor adjustments will be made at the staff level to insure that the program continues to function in an effective, responsive manner. Larger changes to the program, when identified, will be put through the public outreach process and shall be approved by the City Council.

At a minimum, the Language Assistance Plan will be evaluated periodically. Monitoring activities may identify changes that should be made to the Language Assistance Plan. Monitoring activities will include evaluation of the following information:

- Needs identified by the community or limited English proficient population during outreach activities.
- New data related to limited English proficient populations and the City of Paramount's ridership demographics.
- Assessing the sufficiency of staff training and budget for language assistance.

F. Planning and Advisory Bodies

City of Paramount's staff meets regularly to discuss transportation-related planning.

G. Determination of Site of Location of Facilities

The City of Paramount did not use any funds provided by the FTA, whether directly or indirectly, to construct a facility.

VII. SERVICE PERFORMANCE STANDARDS, POLICIES AND MONITORING UNDER LONG BEACH TRANSIT AGREEMENT

The City of Paramount has established the following policies and standards as guidelines to assure the equitable distribution of services and the accessibility of our services offered through Long Beach Transit (LBT). Thus performance should be measured regularly to identify trends over time and to allow prompt changes to be enacted if necessary.

A. Service Performance

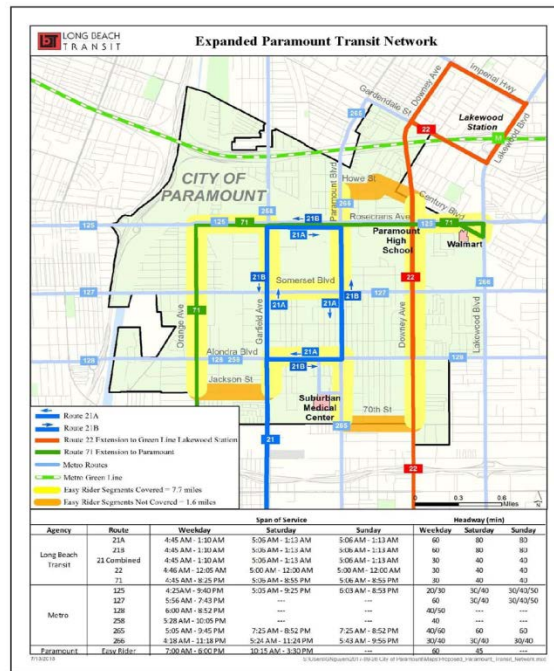
The vehicles that provide service in the City of Paramount are assigned to routes in a manner consistent with providing a fair and even distribution of services to all residents.

1. Vehicle Headway

Routes are grouped into headways, which refers to the amount of time between two vehicles traveling the same direction on a given route or combination of routes. A

shorter headway corresponds to more frequent service. Evaluating headways by line group results in a better approximation of the actual service level that most of LBT customers (who board on the common segment) experience.

Please see Expanded Paramount Transit Network map for specifics on routes, span of service and headway time for routes within the City of Paramount Transit Network.



2. Passenger Load Factor

Passenger load is also a factor, which refers to the ratio of customers to the total number of seats on a vehicle. If passenger loads are high, which results in overcrowded conditions, additional service may be needed to address the issue. Routes are monitored for passenger load with a 100 percent sample of all trips. When trips exceed the load factor standard, LBT attempts to alleviate the problem by adding extra service and/or rearranging routes.

3. On-Time Performance

On-time performance (OTP), or schedule adherence, is another measure of service quality. An OTP standard defines a minimum threshold that LBT should meet regarding the percentage of total daily trips that are recorded as on-time. OTP reflects both the quality and reliability of service, which can affect whether or not people choose to use transit. As part of its Key Performance Indicators (KPI), LBT conducts an analysis of its on time performance on a quarterly basis. LBT considers a route 'on-time' as one minute earlier than the scheduled arrival through five minutes later than the scheduled arrival at each time point. The LBT goal for schedule adherence is 85 percent or greater.

4. Transit Access Analysis

Transit access is the distance a person must travel to gain access to fixed-route transit service, and is a general measure of the distribution of routes within the service area. LBT is a member of a regional and sub-regional transit network. LBT's goal is to, where possible; provide a fixed-route bus stop within one-quarter mile of all residents and major destinations.

To maintain compliance with Title VI, access to transit must be comparable for both minority/low-income and non-minority, non-low-income customers. Title VI guidelines require that transit agencies perform measurements that evaluate the travel time, number of transfers, and costs, from selected census tracts to major destinations.

B. Service Policies

In accordance with FTA Title VI Guidelines, recipients of federal assistance must develop policies for the equitable distribution of transit amenities and buses. Policies to address both service indicators have been developed to ensure the distribution of transit amenities and deployment of transit buses is done in an equitable manner, and that transit customers have equal access to these amenities.

1. Transit Amenities

Transit amenities refer to items of comfort, convenience and safety that are available to the general public. Amenities include but are not limited to bus stop benches, shelters, lighting, trash receptacles, real-time transit information signage and bicycle racks.

Sitting benches will be installed at various locations along the routes where it is legal and permitted in consistency the city's standard practices and regulations. Benches are installed in a fair and even distribution manner to serve all community members wishing to utilize the service.

Bus shelters will be installed along the routes in a manner consistent with the needs of the community's safety, comfort and convenience. These locations are identified by our Public Works Department, with the assistance of the City's Engineer.

Requests from the public and comments received during public input process are considered in these determinations.

2. Vehicle Assignment

Vehicle assignment refers to the process by which transit vehicles are placed into service on routes throughout the transit system to ensure that all communities receive the same benefits derived from the transit vehicles. Vehicle age is also considered a benefit, as it is generally considered a proxy for the condition of the vehicle. LBT's entire fleet of transit buses is 100 percent ADA compliant, with wheelchair securement devices, ramps and kneeling capabilities. Also standard are air conditioning, bike racks and voice annunciators. LBT has developed a policy to distribute its transit vehicles in an equitable

manner using length of vehicle and vehicle age metrics as primary determining factors.

LBT buses differ primarily by vehicle length, fuel type, and vehicle age. The length of vehicle used on a particular route is determined by the type of service provided. Articulated 60-foot, low-floor buses are used on high-volume routes, which may be characterized by sustained demand and/or short-term demand, and possess trip generators at both ends of the route. These vehicles may also be used with LBT's limited stop service. LBT's 40-foot, low-floor buses are deployed on regular routes and in some cases on high-volume routes when required.

C. Transportation Program Serviced by Long Beach Transit

As of February of 2019, the City of Paramount has contracted service with Long Beach Transit. As a result Long Beach Transit expanded transportation service includes the following:

1. Fixed-Route- 21A & 21B

The cost per trip is \$1.25. Hours of operation are Monday - Friday, 4:45 a.m. to 1:10 a.m., Saturday & Sunday, 5:00 a.m. to 12:00 a.m. The route offers a 30 minutes headway Monday through Friday, 40 minute headway on Saturday and Sunday. Loop 21A runs clockwise via Garfield Avenue, Rosecrans Avenue, Paramount Boulevard, Rosecrans Avenue and Alondra Boulevard. Loop 21B runs counter-clockwise via Alondra Boulevard, Paramount Boulevard, Rosecrans Avenue and Garfield Avenue. This route Improved transit service to downtown Paramount.

2. Fixed Route- 22

The cost per trip is \$1.25. Hours of operation are Monday - Friday, 4:46 a.m. to 8:25 p.m., Saturday & Sunday, 5:00 a.m. to 12:00 a.m. The route offers a 30-minute headway Monday – Friday, 40-minute headway, Saturday & Sunday.

3. Fixed Route- 71

The cost per trip is \$1.25. Hours of operation are Monday - Friday, 4:45 a.m. to 8:25 p.m., Saturday & Sunday, 5:06 a.m. to 8:55 p.m. The route offers a 30-minute headway, Monday - Friday; 40-minute headway, Saturday & Sunday. This route was extended to Walmart, replacing the City of Paramount's Easy Rider.

4. Dial-A-Lift (DAL)

Dial-A-Lift is a paratransit service for persons with disabilities. The service, called Dial-A-Lift (DAL) is operated as a public-private partnership. This service is in addition to Access Services, the Los Angeles County complementary paratransit service mandated by the Americans with Disabilities Act of 1990 (ADA).

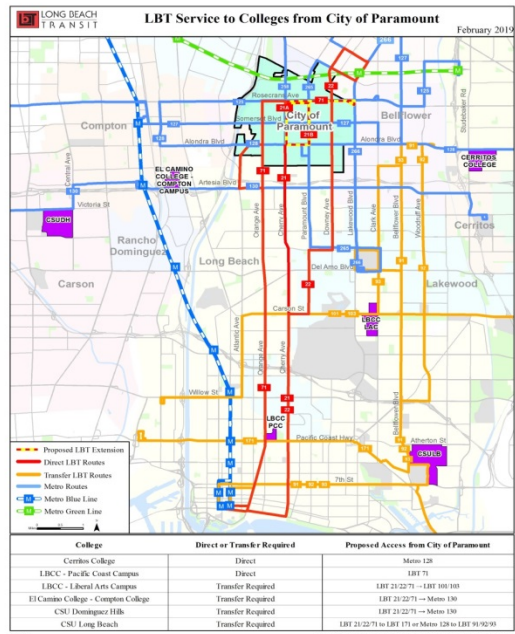
DAL service, with a fleet of 10 vans, is available from Sunday through Thursday, and on holidays, from 7 a.m. to 10:30 p.m. On Friday and Saturday, the hours are 7 a.m. to 11:30 p.m. The service operates in the cities of Long Beach, Lakewood, Signal Hill and Paramount, which comprise about 80 percent of LBT's fixed-route service area. Through a 2015 solicitation, LBT has contracted with Global Paratransit Inc., to provide the service. LBT staff is responsible for certifying eligible members and responding to any member concerns or complaints. The Contractor is responsible for reservations, dispatch, service delivery and vehicle maintenance. The Contractor charges LBT on a per-mile basis.

5. College Bound Transit Access Pass (TAP) Card Program

LBT provides the City of Paramount with 150 monthly TAP cards loaded with an unlimited value for college student use on LBT and LA Metro buses. Paramount residents or graduates of Paramount High School that are incoming or continuing college may apply for a free Paramount University Pass, also known as a TAP card through the City of Paramount. In order to qualify, applicants must submit the following:

- Proof they are residents of the City of Paramount.
- Proof they are enrolled in a vocational school, Community College and/or University.
- Provide proof of completion of a survey provided for by Los Angeles Metro.

The card provides students with unlimited travel on LBT and Los Angeles Metro bus routes to nearby schools. Service is available for fall, spring and summer semesters. In the event, more than 150 cards are needed; the City of Paramount is able to cover the additional cost. Re-enrolling students will only need to submit a copy of their updated class schedule to prove they are enrolled in the currently semester, in order for their card to be activated with credit to travel. Please see map of the accessibility of College Bound Transit Access Pass (TAP) Card Program.



VIII. SERVICE PERFORMANCE STANDARDS, POLICIES AND MONITORING UNDER ADMINISTRATIVE SERVICES COOPERATIVE, INC.

The City of Paramount has established the following policies and standards as guidelines to assure the equitable distribution of services and the accessibility of our Dial-A-Ride (DAR), Medical Transit Program, and Elderly Nutrition Transit Program (ENP) programs offered through Administrative Services Cooperatives, Inc.

A. Service Performance

Administrative Services Cooperatives, Inc. shall provide the necessary management and administration personnel whose expertise will ensure efficient operation of the City of Paramount’s Medical Transit Program, Dial-A-Ride Program and Elderly Nutrition Transit Program.

Contractor must ensure all drivers are legally licensed to operate a taxi in the State of California, alert, careful, courteous, and competent in their driving habits. Drivers must be courteous and friendly toward all passengers, neat and clean in appearance, bilingual (Spanish/English) and knowledgeable about our procedures and policies. All drivers working for the contractor shall be given sensitivity training to deal with the elderly and handicapped. Contractor must ensure dispatcher/reservations clerks are courteous, friendly, bilingual (Spanish/English) and knowledgeable of our procedures and policies.

B. Service Policies

Administrative Services Cooperatives, Inc. shall provide transportation services to elderly residents, 60 years or older, and ambulatory and non-ambulatory disabled residents.

1. Fares & Trips

Each one-way trip shall debit the users MJM swipe card by \$1.00, excluding the Elderly Nutrition Transit Program which shall be provided at no cost but shall still require the use of an MJM swipe card. City of Paramount residents shall not be required to prove any additional payment in relations to the trip other the \$1.00 card debit regardless of the actual meter readout.

We have the sole discretion to establish a limit to the maximum amount of trips per month that each resident is allowed. Additional trips are allowed to the Medical Transit Program in the event of an ongoing medical treatment and/or illness/condition that requires multiple weekly trips to a medical facility.

2. Vehicle Assignments

This program serves eligible elderly and disabled passengers; a priority is placed on the availability of accessible vehicles for those customers who have wheelchairs, scooters or other physical limitations or special needs. All vehicles shall be fully equipped taxicabs, painted with Fiesta Taxi or Ride Yellow logo and trade dress, and shall be either:

- Full-size sedan with 4 seats, minivans and full-size vans with a seating capacity of not less than 5 passengers.
- Minivans modified for wheelchair accessibility, compliant with all ADA regulations, and equipped with a ramp and not less than two wheelchair tie downs.

In order to encourage fuel efficiency, a portion of the fleet may also consist of smaller vehicles which are hybrid or alternative fuel technologies. Administrative Services Cooperatives, Inc. will work with the City of Paramount to assure that appropriately sized vehicles are used on every customer call.

3. Response Time

The amount of time between requests for service the same day shall not be longer than 20 minutes. Administrative Services Cooperatives, Inc. is required to submit monthly reports regarding response time. Residents shall be able to re-schedule trips up to one month in advance. The Contractor is required to pick-up residents within 10 minutes of pre-scheduled trip appointment time.

4. Dispatch/Scheduling

Administrative Services Cooperatives, Inc. shall provide the personnel necessary to schedule and deploy drivers and vehicles in accordance with the service hour schedule. In addition, the Contractor provides capable and courteous personnel who are responsible for taking service requests and responding to telephone inquiries regarding transportation services.

C. Transportation Program Serviced by Administrative Services Cooperative, Inc.

1. Dial-A-Ride (DAR)

A one-way trip is either a trip to an approved location within the City of Paramount from a residential location within the City of Paramount or a trip from an approved location within the City of Paramount to a residential location within the City of Paramount. Approved destination locations are retail, medical, or government service locations within the City of Paramount. Service hours are 6:00 a.m. to 9:00 p.m., Monday through Sunday, including holidays.

2. Elderly Nutrition Transit Program (ENP)

A one-way trip is either from a residential location within the City of Paramount to the City's Elderly Nutrition Program located at the Paramount park Community Center or a trip from the Elderly Nutrition Program location to a residential location within the City of Paramount. Service hours are 9:00 a.m. to 3:00 p.m., Monday through Friday, excluding specific holidays.

3. Medical Transit Program

A one-way trip is either a trip to an approved medical facility from a residential location within the City of Paramount or a trip from an approved medical facility to a residential location within the City of Paramount. More than one person may be transported per trip to provide assistance or companionship to the elderly or disable resident. Service hours are 6:00 a.m. to 9:00 p.m., Monday through Sunday, including holidays.

IX. CONTACT

For additional information on the City of Paramount's Title VI Plan, or its efforts to comply with the Civil Rights Act of 1964 or Executive Order 13166 Improving Access to Services for Persons with Limited English Proficiency, please contact:

David Johnson, Community Services & Recreation Director
City of Paramount
16400 Colorado Avenue, Paramount, CA 90723
(562) 220-2138
E-Mail: djohnson@paramountcity.com