

CITY OF MADERA 2022 - 2025 Title VI Program



City of Madera Grants Department— Transit Services
205 West 4th Street
Madera, Ca. 93637

2022 City of Madera Title VI Program

Madera Metro Transit

June 2022

Madera Metro operates fixed route, ADA Paratransit and Dial-a-Ride bus service throughout the city of Madera.

This document has been prepared by City staff and It has been adopted by the City of Madera City Council to comply with Title VI of the Civil Rights Act of 1964, including recent provisions detailed in U.S. Department of Transportation's FTA Circular 4702.1B, "Title VI Requirements and Guidelines for Federal Transit Administration Recipients."



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Reference: FTA Circular 4702.1B Title VI Requirements and Guidelines for Federal Transit Administration (FTA) Recipients (October 1, 2012).

Introduction

The purpose of this Title VI Program is to establish guidelines to effectively monitor and ensure that the City of Madera's transit services, Madera Metro and Dial-A-Ride are in compliance with FTA Title VI requirements.

Title VI of the Civil Rights Act of 1964 (Title VI) states that "no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance." The FTA is required to ensure that federally supported transit services and related benefits are provided consistent with Title VI. The Title VI Report requires some update every three years.

The City of Madera will ensure that its programs, policies, and activities comply with Department of Transportation's (DOT) Title VI Regulations (49 CFR Part 21) and with Limited English Proficient (LEP) Persons requirements (70 FR 74087, December 14, 2005). The City is committed to creating and maintaining a public transportation system that is free of all forms of discrimination. The City will take necessary preventive corrective and disciplinary actions to stem behavior that violates this policy or the rights and privileges it is designed to protect. FTA requires recipients to document compliance with DOT Title VI regulations by submitting a Title VI Program to their FTA regional civil rights officer once every three years. Implementation of the Title VI Program is managed by the City's Transit Program Manager, who serves as the Title VI Compliance Coordinator and the City's Grants Administrator.

CITY OF MADERA – MADERA METRO TITLE VI POLICY STATEMENT

The City of Madera is committed to ensuring that no person is excluded from participation in or denied the benefits of its services based on race, color, or national origin, as provided by Title VI of the Civil Rights Act of 1964, as amended. The City's objectives are to:

- Ensure that the level and quality of transportation service is provided without regard to race, color or national origin.
- Identify and address, as appropriate, disproportionately high and adverse human health and environmental effects, including social and economic effects of programs and activities on minority populations and low-income populations.
- Promote the full and fair participation of all affected populations in transportation decision making.
- Prevent the denial, reduction or delay in benefits related to programs and activities that benefit minority populations or low-income populations.
- Ensure meaningful access to programs and activities by persons with limited English proficiency (LEP).

TITLE VI REQUIREMENTS

Section 1 | Requirement to Notify Beneficiaries of Protection under Title VI.

To comply with 49 CFR, Section 21.9(d), the City shall provide information to the public regarding the City's obligations under DOT's Title VI regulations and apprise members of the public of the protections against discrimination afforded to them by Title VI.

TITLE VI NOTICE TO THE PUBLIC

The City of Madera informs members of the public of their Title VI protection rights by several means, including posting of a Title VI Notice to the Public and providing bilingual complaint procedures, as shown in Exhibits A and B. The City also provides a bilingual complaint form and posts a Title VI bilingual notice for public viewing as shown in Exhibit C, and post a Title VI bilingual notice for public viewing at multiple City owned facilities as shown in Exhibit I.



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Section 2 | Requirement to Post Notice of Title VI

The City is required to post a public notice of the protections against discrimination afforded by Title VI.

CITY OF MADERA LOCATIONS WHERE TITLE VI NOTICE IS POSTED

The following is a list of locations where transit-related bilingual Title VI Public Notices are posted:

Location	Address
Madera Metro Transit buses	
Madera Transit Center	1951 Independence Drive
Madera Intermodal Center	123 North E Street
City of Madera Website	www.madera.gov

Helpful Transit Information - City of Madera

https://www.madera.gov/home/departments/transit/helpful-transit-information/#tr-city-of-madera-title-vi-policy-statement-245606

Log In - City of Mad... QR Code Generator... What is the percent... Imported TRAMS CalCard Madera Word Press Pay Stub Trans2 Black Cat - Trams TAM Plan - Template Clean Fleet | SunLin...

The City of MADERA

HOME YOUR GOVERNMENT CITY SERVICES DOING BUSINESS OUR COMMUNITY HOW DO I... DEPARTMENTS REDISTRICTING

Fares Service Alerts Additional Information

Helpful Transit Information

Share this:

2017 Fare Analysis Report

City of Madera Title VI Policy Statement

City of Madera Title VI Policy Statement

The City of Madera is committed to ensuring that no person is excluded from participation in or denied the benefits of its services on the basis of race, color, or national origin, as provided by Title VI of the Civil Rights Act of 1964, as amended. The City's objectives are to:

- Ensure that the level and quality of transportation service is provided without regard to race, color, or national origin.
- Identify and address, as appropriate, disproportionately high and adverse human health and environmental effects, including social and economic effects of programs and activities on minority populations and low-income populations.
- Promote the full and fair participation of all affected populations in transportation decision making.
- Prevent the denial, reduction or delay in benefits related to programs and activities that benefit minority populations or low-income populations.
- Ensure meaningful access to programs and activities by persons with limited English proficiency (LEP).

City of Madera Transit TITLE VI Program

Title VI Transit Complaint Process

The City of Madera is committed to a policy of non-discrimination in the conduct of its business, including its Title VI responsibilities, and to the delivery of equitable and accessible transportation services. Any person who believes that he or she has been subjected to discrimination under Title VI on the basis of race, color or national origin may file a Title VI complaint with the City within 60 calendar days from the date of the alleged discrimination.

You may download a copy of the Title VI Complaint Form in the following languages:

[Title VI Complaint Form - English](#)

[Title VI Complaint Form - Spanish](#)

A copy of the Title VI Complaint Form may also be obtained by calling 559-661-3693. The City will provide appropriate assistance to complainants who are limited in their ability to communicate in English.

Title VI Notice to the Public - English



**CITY OF MADERA
Madera Metro and Dial-A-Ride
Title VI Notice & Complaint Process**

The City of Madera is committed to ensuring that no person is excluded from participation in or denied the benefits of its services based on race, color, or national origin, as provided by Title VI of the Civil Rights Act of 1964. Any person who believes that he or she has been subjected to discrimination under Title VI based on race, color or national origin may file a Title VI complaint with the City within 60 calendar days from the date of the alleged discrimination.

Complaints may be filed with the City in writing and may be addressed to:

Transit Program Manager (Compliance Specialist) – Grants Department
City of Madera
205 West Fourth Street
Madera, CA 93637

A copy of the Title VI Complaint Form (in English or Spanish) and additional information may be obtained from the City's web site at "www.madera.gov" (under "City Service - Transit – Additional Information – City of Madera Title VI Policy Statement) or by calling 559-661-3693. The City will provide appropriate assistance to complainants who are limited in their ability to communicate in English.

Title VI Notice to the Public - Spanish



CIUDAD DE MADERA
Madera Metro y Dial-A-Ride
Título VI Noticia y Proceso de Quejas

La Ciudad de Madera, se compromete a garantizar que ninguna persona sea excluida de participar o denegar los beneficios de servicios basado por raza, color, linaje u origen nacional, según lo dispuesto en el Título VI de la Ley de Derechos Civiles de 1964. Cualquier persona que cree que él o ella ha sido objeto de discriminación en virtud del Título VI basado por raza, color u origen nacional puede presentar una queja del Título VI con la Ciudad dentro de 60 días del calendario a partir de la fecha de la supuesta discriminación.

Las quejas pueden ser presentadas en la Ciudad por escrito y pueden ser dirigidas a:

Gerente del Programa de Tránsito (Especialista en Cumplimiento) - Departamento de
Subvenciones
Ciudad de Madera
205 West Fourth Street
Madera, CA 93637

Una copia del Título VI Formulario de Queja (en Inglés o Español) y la información adicional se puede obtener desde el sitio web de la Ciudad en "www.madera.gov" (en "Servicio de la ciudad - Tránsito - Información adicional - Declaración de política del Título VI de la ciudad de Madera") o llamando al 559-661-3693. La Ciudad proveerá asistencia apropiada para los denunciantes que sean limitados en su capacidad de comunicarse en inglés.

Section 3 | Requirement to Develop Title VI Compliant Procedures and Complaint Form

The City is required to develop procedures for investigating and tracking Title VI complaints filed against the City and to make these procedures for filing a complaint available to the general public.

City of Madera Title VI Complaint Procedures

Submission of Complaint: If a customer believes he/she has received discriminatory treatment by the City of Madera transit system based on race, color or national origin, the customer will have the right to file a complaint with the Transit Title VI Compliance Coordinator.

The complaint must be filed no later than sixty (60) calendar days of the alleged discriminatory incident and be signed by the complainant(s). Written complaints shall include:

- Date of the alleged discrimination
- Date when the complainant(s) became aware of the alleged act of discrimination.
- Date that conduct was discontinued or the latest instance of conduct.
- Detailed description of the issues, including names and job titles of those individuals perceived as parties in the complaint.

Complaints may be filed with the City in writing and may be addressed to:

Transit Program Manager (Compliance Specialist) – Grants
Department City of Madera
205 West Fourth Street
Madera, CA 93637

The Title VI Complaint Form is available for download at the following web sites:

English:

<https://www.madera.gov/wp-content/uploads/2022/06/Title-VI-Complaint-Form-English-4.pdf>

Spanish (Español):

<https://www.madera.gov/wp-content/uploads/2022/06/TitleVI-Complaint-Form-Spanish-3.pdf>

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A copy of the Title VI Complaint Form may also be obtained by calling 559-661-3693. The City will provide appropriate assistance to complainants who are limited in their ability to communicate in English.

Investigation of Complaints

Upon receipt of the complaint, the Compliance Coordinator will begin an investigation to determine if the City of Madera has jurisdiction. As appropriate, the complaint will be investigated and a determination made. Formal investigation will be confidential and will include, but is not limited to, details of the specific incident, frequency and dates of occurrences and names of any witnesses.

Claimant will be notified in writing of the resolution.

The complainant has ten business days from the date of the letter to send requested information to the Compliance Coordinator. If the Coordinator is not contacted by the complainant or does not receive the additional information within ten business days, the City of Madera can administratively close the case.

Upon completion of the review, the Grants Administrator (Compliance Coordinator direct report) shall make a recommendation regarding the merit of the complaint, whether remedial actions are available to provide redress, and whether improvements to the City Title VI process are needed.

A case can be administratively closed if the complainant no longer wishes to pursue their case. Following the investigation, the Title VI Compliance Coordinator will issue one of the two letter to the complainant: (1) a closure letter, or (2) a letter of finding. A closure letter summarizes the allegations and states there was not a Title VI violation and that the case will be closed. A letter of finding summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member or other action will occur.

Appeal Process

If the complainant is not satisfied with the resolution, he or she may appeal it to:

Human Resources Director
City of Madera – Human Resource
Department 205 West 4th Street
Madera, CA 93638

Submission of Complaint to the Department of Transportation

The complainant may also file a complaint directly to:

Civil Rights Officer – Region IX
US Department of Transportation
Federal Transit Administration,
TRO-9 90 Seventh Street, Suite 15-
300
San Francisco, CA 94103-6701

In accordance with Chapter 9, Complaints, of FTA Circular 4702.1B, such a complaint must be filed within 180 calendar days after the date of the alleged discrimination.

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Title VI Complaint Form - English



City of Madera Transit System Civil Right Complaint

Title VI of the 1964 Civil Rights Act requires 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 following information is necessary to assist us in processing your complaint. Should you require any assistance in completing this form, please contact the Transit Program Manager at 559.661.3693. Complete and return this form to:

Transit Program Manager – Compliance Specialist
205 W. 4th Street
Madera, Ca. 93638

1. Complainant's Name: _____

2. Address: _____

3. City: _____ State: _____ Zip Code: _____

4. Telephone (home): _____ (business): _____

5. Person discriminated against (if someone other than the complainant):

Name: _____

Address: _____

City: _____ State: _____ Zip Code: _____

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

a. Race/Color o

b. National Origin o

c. Age o

d. Gender o

e. Income o

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7. What date did the alleged discrimination take place?

8. In your own words, describe the alleged discrimination. Explain what happened and who you believe was responsible.

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: _____

Telephone Number: _____

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

Title VI Complaint Form - Spanish



Sistema de Tránsito de la Ciudad de Madera

Denuncia de derechos civiles

El Título VI de la Ley de Derechos Civiles de 1964 exige que: "Ninguna persona en los Estados Unidos, por motivos de raza, color u origen nacional, será excluida de la participación, se le negarán los beneficios o será objeto de discriminación bajo cualquier programa o actividad que reciba asistencia financiera federal."

La siguiente información es necesaria para ayudarnos a procesar su queja. Si necesita ayuda para completar este formulario, comuníquese con el Administrador del Programa de Tránsito al 559.661.3693. Complete y envíe este formulario a:

Gerente del Programa de Tránsito - Especialista en Cumplimiento

205 W. 4th Street

Madera, Ca. 93638

1. Nombre del demandante: _____

2. Dirección: _____

3. City: _____ State: _____ Zip Code: _____

4. Teléfono (domicilio): _____ (empresa): _____

5. Persona discriminada (si alguien distinto del denunciante):

Nombre: _____

Dirección: _____

City: _____ State: _____ Zip Code: _____

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6. ¿Cuál de las siguientes opciones describe mejor la razón por la que cree que se produjo la discriminación? ¿Fue por tu culpa:

a. Raza/Color o

b. Origen nacional o

c. Edad

o

d. Gender o

e. Ingresos o

7. ¿En qué fecha se produjo la presunta discriminación?

1. En sus propias palabras, describa la supuesta discriminación. Explica lo que pasó y quién crees que fue el responsable.

9. ¿Ha presentado este documento conforme con cualquier otra agencia federal, estatal o local, o con cualquier tribunal federal o estatal? Sí o No o

En caso afirmativo, marque cada casilla que corresponda:

Agencia federal o

Tribunal federal o

Agencia estatal o

Tribunal estatal o

Agencia local o

10. Sírvanse proporcionar información sobre una persona de contacto en el organismo/tribunal en el que se presentó la denuncia.

Nombre: _____

Dirección: _____

City: _____ State: _____ Zip Code: _____

Número de teléfono: _____

11. Por favor, firme abajo. Puede adjuntar cualquier material escrito u otra información que considere relevante para su queja.

Complainant's Signature

Fechar

Section 4 | Requirement to Record and Report-Related Title VI Investigations, Complaints, and Lawsuits

The City is required to prepare and maintain a list of investigations, complaints, or lawsuits that pertain to allegations of discrimination based on race, color, and/or national origin in transit-related activities and programs and that pertain to the entity submitting the report, not necessarily the larger agency or department of which the entity is a part.

The City of Madera has not been involved in any transit-related Title VI investigations, complaints or lawsuits. The City of Madera Title VI Transit Compliance Coordinator will maintain a list of Title VI investigations, complaints, and lawsuits including a comprehensive summary and description of actions taken by the City, as required by the Title VI regulations. The list shall include the date that the investigation, lawsuit, or complaint was filed; a summary of the allegations(s); the status of the investigation; lawsuit, or complaint; and actions taken by the City in response, or final findings related to the investigation, lawsuit, or complaint. The list shall be included in the City's Title VI submittal to FTA every three years.

Section 5 | Promoting Inclusive Public Participation and Language Assistance Plan

The City is required to develop a public participation plan that includes an outreach plan to engage minority and limited English proficient populations, as well as a summary of outreach efforts made since the last Title VI Program submission. The City also must have a language assistance plan for providing language assistance to persons with limited English proficiency (LEP).

The City's Public Participation Plan is reflected in the "City of Madera Transit Services title VI Limited English Proficiency (LEP) Plan" under "Outreach Techniques." The City's public participation activities, public meetings, and participation in community activities are described in the LEP Plan.

City transit staff also participates in the development and updates to the Madera County Transportation Commission (MCTC) "Public Participation Plan" and coordinates and integrates its outreach efforts with the MCTC as needed.

The City's Language Assistance Plan is reflected in the City's LEP Plan and includes language assistance measures. The City's approach includes several options available to LEP persons, including both oral and written language services. Specific details are included in the City's LEP Plan in Exhibit F.

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City of Madera – Madera Metro Public Participation Plan

Public Outreach Activities

The City of Madera web site posts Madera Metro and Dial-A-Ride schedules, notices, and surveys. The City's web site provides material in both English and Spanish. The City also provides easy access to bilingual (English and Spanish) administrative staff and drivers at the City's Downtown Intermodal Transit Center during operating hours to answer questions during their regular shift schedules for those LEP passengers who use the City's bus system.

The City reaches out to the community directly through meetings with agency and community staff and their clients, as needed. Information regarding the City's transit services is disseminated at these meetings, including schedules and appropriate fliers. Schedules also are made available at a variety of locations throughout the community and on the Madera Metro and Dial-A-Ride systems.

Public Meetings

The City conducts quarterly Transit Advisory Board (TAB) meetings that are open to the general public. The seven-member TAB is composed of diverse public citizens of the community and takes to public testimony prior to initiation of each meeting.

The City also collaborates with the Madera County Transportation Commission (MCTC), the Metropolitan Planning Organization (MPO), in its Unmet Transit Needs process. The Unmet Transit Needs hearings are accessible to the general public, offer bilingual translation, and are consistent with MCTC's comprehensive Public Participation Plan and process that ensures meaningful access to LEP throughout the Madera County region. The MCTC public hearing is accessible by Madera Metro Fixed-Route services or on Dial-A-Ride at no cost to passengers.

City transit staff also participates in the development of the MCTC "Public Participation Plan." A series of meetings are conducted with participants from throughout the community. Recommendations to maximize community involvement are reflected in this plan and adopted by the MCTC Board. The City considers and uses the MCTC Public Participation Plan as a blueprint for City to engage the public.

General Awareness Surveys

The City of Madera transit system conducts bilingual (English and Spanish) on-board rider and general awareness surveys. These personal one-on-one surveys allow riders to convey any concerns or comments they may have regarding Madera Metro Transit services.

Bilingual Outreach

The City of Madera transit system provide Spanish-speaking clients with bilingual information on public transit services. Staff assistance is utilized in outreach programs and offered for programs and public meeting, such as the Transit Advisory Board quarterly meetings.

Telephone Access

Transit staff is available to answer questions in Spanish during normal operational hours (Monday –

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Friday: 7am – 6:30pm; Saturday: 7am – 4pm). Madera Metro transit system is accessible by phone at 559-661-RIDE (7433).

EMAIL

Customers may share their questions and concern through email be submitting to:

- transitinfo@madera.gov
- dhuff@madera.gov (Transit Program Manager)

Participation in Community Activities

The City engages in community activities that promote its transit services. These activities include transportation public workshops and outreach presentations where a broad cross-section of community can access information on the City transit system.

Strategies

To promote inclusive public participation, the City of Madera will leverage resources of the [Madera County Transportation Commission Public Participation Plan](#) and use its own resources available to employ the following strategies, as appropriate:

- Provide for early, frequent and continuous engagement by the public.
- Expand traditional outreach methods. Think outside the box: go to street fairs, faith-based institutions, libraries, etc.
- Select accessible and varied meeting locations and times
- Employ different meeting sizes and formats
- Provide childcare and food during meetings, if possible.
- Use social media in addition to other resources as a way to gain public involvement
- Use radio, television or newspaper ads on stations and in publications that serve LEP populations. Outreach to LEP populations may also include audio programming available on podcasts.

It is anticipated that these strategies will be outlined in the City's Marketing and Outreach Plan slated to be finalized on or before June 2023*.

Due to the Covid-19 Pandemic, the City of Madera Transit system marketing campaign was greatly delayed.

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Summary of Outreach Efforts - Documented Public Outreach (FY 2020 to present)*

The direct public outreach and involvement activities conducted by City of Madera, Transit Division since the approval of the 2019-2022 Plan are summarized in the table below. Efforts include meetings, surveys, focus groups, etc. Information pertinent to each event will be provided upon request. Examples include copies of: announcements, agendas/minutes, posters, attendee list, etc.

Event Date	Section 5307 Grantee Staff	Event	Date Publicized and Communication Method	Outreach Method
12-27-20	Program Manager; Grants Specialists	Transit Advisory Board Special Meeting	Public Notice, Website, Email List	Meeting
1-27-21	Program Manager	Transit Advisory Board Special Meeting	Public Notice, Website, Email List	Meeting
4-27-21	Program Manager	Transit Advisory Board Special Meeting	Public Notice, Website, Email List	Meeting
7-27-21	Program Manager	Transit Advisory Board Special Meeting	Public Notice, Website, Email List	Meeting
9-16-21	Program Manager	Madera Fair	Flyers, Social Media, Website	Public Outreach
10-20-21	Program Manager, Hired Consultant	Virtual Community Forum	Public Notice, Website, Email List, Social Media	Community Input
10-27-21	Program Manager	Transit Advisory Board Special Meeting	Public Notice, Website, Email List	Meeting
1-27-22	Program Manager	Transit Advisory Board Special Meeting	Public Notice, Website, Email List	Meeting
4-27-22	Program Manager	Transit Advisory Board Special Meeting	Public Notice, Website, Email List	Meeting

*Multiple outreach efforts were also completed through the City Transit System Facebook Page “Madera Metro” <https://www.facebook.com/maderametro>

Section 6 | Requirement to Provide Meaningful Access to Limited English Proficient Persons

The City must have a language assistance plan for providing language assistance to persons with limited English proficiency (LEP). Title VI and its implementing regulations require that FTA recipients take responsible steps to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are LEP.

The City of Madera web site (<https://www.madera.gov/home/departments/transit/>) posts Madera Metro and Dial-A-Ride schedules, notices, and surveys. The City's web site provides material in both English and Spanish. The City also provides easy access to bilingual (English and Spanish) administrative staff and drivers/dispatch (via terms in the City's third-party transit operator contract) at the City's Transit Center during operating hours to answer questions during their regular shift schedules for those LEP passengers who use the City's bus system.

The City conducts quarterly Transit Advisory Board (TAB) meetings that are open to the general public. The seven-member TAB is composed of diverse public citizens of the community and takes public testimony prior to initiation of each meeting. The City also collaborates with the Madera County Transportation Commission (MCTC), the Metropolitan Planning Organization (MPO), in its Unmet Transit Needs process. The Unmet Transit Needs hearings are accessible to the general public, offer bilingual translation, and are consistent with MCTC's comprehensive Public Participation Plan that ensures meaningful access to LEP throughout the Madera County region.

City of Madera Title VI Limited English Proficiency (LEP) Plan

City of Madera Transit Services Limited English Proficiency (LEP) Plan

Introduction

This Limited English Proficiency (LEP) Plan has been prepared to address the City of Madera Grants and Transit Division's responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, Federal Transit Administration Circular 4702.1B dated October 1, 2012, which states that no person shall be subjected to discrimination based on race, color, or national origin.

Executive Order 13166, titled "Improving Access to Services for Persons with Limited English Proficiency" (65 FR 50121, Aug. 11, 2000), indicated that differing treatment based upon a person's inability to speak, read, write, or understand English is a type of national origin discrimination. It directs each federal agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discrimination does not take place. This order applies to all State and local agencies which receive federal funds.

Background

The City of Madera Grants Department and Transit Division administers the Madera Metro and Dial-A-Ride transit services that are operated by a contract service provider. The current transit service provider is MV Public Transportation, Inc.

The Madera City Council is the policymaking body for the system. A seven-member Transit Advisory Board (TAB) composed of residents appointed by the City Council, acts as a study and steering committee.

The City of Madera transit services (Madera Metro) consist of a Fixed Route and a Dial-a-Ride service (DAR). The City of Madera Grants Department and Transit Division has developed this LEP Plan to help identify reasonable steps for providing language assistance to persons with limited English proficiency who wish to access services provided by Madera Metro and Dial-A-Ride. As defined by Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write, or understand English.

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

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

1. The number or proportion of LEP persons in the service area who may be served or are likely to encounter the City of Madera transit programs, activities, or services.
2. The frequency with which LEP persons encounter City of Madera transit services programs, activities, or services.
3. The nature and importance of programs, activities, or services provided by the City of Madera transit services to the LEP population.
4. Resources available to the City of Madera Grants Department and Transit Division and overall cost to provide LEP assistance.

A summary of the results of the City of Madera transit services' four-factor analysis is in the following section.

Meaningful Access: Four-Factor Analysis

1. The number or proportion of LEP persons in the service area who may be served or are likely to encounter City of Madera transit programs, activities, or services.

As the City of Madera population is below the 100,000-population threshold for full inclusion in the most recent American Community Survey (ACS), analysis is based on the 2020 US Census. City of Madera transit services staff reviewed the 2020 U.S. Census and determined that, out of a population of City of Madera 66,224 residents, 36,624 (55.3%) of City of Madera residents speak a language other than English. In the City of Madera 17,598 residents (26.5%) have limited English proficiency; that is, they speak English "not well" or "not at all". In the City of Madera, of those persons with limited English proficiency, the majority speak Spanish (10,761 / 16.2% Spanish Speaking Only Residents). The City's most current demographic analysis shows that the number or proportion of LEP served or encountered in the eligible service area is as follows:

Census Tracts

Description	5.10	5.11	5.12	5.15	6.02	6.03	6.04
Total Population	6,128	6,557	4,693	3,705	4,067	6,293	5,139
Hispanic/Latino	4,779	5,311	2,815	2,593	3,782	5,349	4,470
Percentage	78%	81%	60%	70%	93%	85%	87%

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Description	7.02	7.01	8.01	8.02	9.01	9.02	9.03
Total Population	6,611	5,433	2,625	4,167	3,884	3,977	3,620
Hispanic/Latino	4,098	3,748	2,126	3,708	2,835	2,823	3,294
Percentage	62%	69%	81%	89%	73%	71%	91%

Lastly, through staff contact, and feedback from the transit operator, it has been noted that not only is Spanish the primary language identified, but varying dialects of Spanish from different countries is also being experienced.

Reference

- <https://censusreporter.org/profiles/14000US06039000201-census-tract-201-madera-ca/> - Census Tract Data
- <https://data.census.gov/cedsci/table?q=Madera%20city,%20California&tid=ACST5Y2020.S1601> – LEP Results

2. The frequency with which LEP persons come in contact with City of Madera transit services programs, activities, or services.

All transit services are provided in one or more of the above-referenced census tracts. A high percentage of Hispanic/Latino individuals therefore come into contact with the program. On-board ridership surveys conducted by the City reflect that 75 percent of riders utilize MAX or Dial-A-Ride services three to five days per week; 16 percent six to seven days per week; and 8 percent one to less than one day per week.

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

The largest geographic concentration of LEP individuals in the City of Madera transit services area is Spanish-speaking. On-board ridership surveys conducted by the City indicate that 83 percent are captive transit riders, and 30 percent could have made their trip by another means as a passenger. The main purposes indicated for trips were 61 percent for medical/dental; 50 percent for shopping; 42 percent for school; 20 percent for work; and 17 percent for other purposes including religious services and social outings.

4. The resources available to City of Madera Transit Division and overall cost to provide LEP assistance.

City of Madera transit staff has access to a variety of resources and collaborates with multiple organizations that help with outreach and providing LEP assistance at low or no cost. Community-based resources include:

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- City of Madera Transit Advisory Board
- City of Madera Senior Centers
- City of Madera Intermodal Center
- City of Madera Transit Center
- Madera County Transportation Commission (MCTC) Social Services Transportation Advisory Committee (SSTAC)
- MCTC Board Unmet Transit Needs Process
- MCTC Public Participation Plan Committee
- Madera County Social Services Department
- Community Action Partnership of Madera County
- Camarena Health Center
- Grant-funded Consultant Services
- Translation Services

The above community resources will continue to be used on a regular basis to assist in identifying needs of the City's LEP population. They will also serve to widely disseminate bilingual transit service information and announcements and to notify the LEP population of planned workshops and outreach efforts.

Based on the four-factor analysis, the City of Madera will develop its LEP Plan as outlined in the following section.

Identification of LEP Population

The Transit Division has developed several possible ways to assist in identifying LEP populations within the City, including:

1. Examine records to see if requests for language assistance have been received in the past, either at meetings or over the phone, to determine whether language assistance might be needed at future events or meetings.
2. Have a staff person greet participants as they arrive to City of Madera transit-sponsored events. By informally engaging participants in conversation it is possible to gauge each attendee's ability to speak and understand English.
3. Survey vehicle operators and other front-line staff, like dispatchers, dial-a-ride schedulers, and service development planners on their experience concerning any contacts with LEP persons.

Network with local human services organizations (such as Social Services and Public Health) to assist in identifying LEP groups and individuals most in need of LEP assistance and to further facilitate dissemination of information about Madera's transit.

Language Assistance Measures

There are plans for several language assistance options available to LEP persons, including both oral

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and written language services. There are also various ways in which City of Madera transit staff can respond to LEP persons, whether in person, by telephone, or in writing.

- a. Provide a bilingual City employee at community events, public hearings, and Transit Advisory Board (TAB) meetings.
- b. Placement of statements in notices and publications that interpreter services are available for these meetings.
- c. Annually survey bus drivers and other front-line staff, like dispatchers, Dial-A-Ride schedulers, and service development planners on their experience concerning any contacts with LEP persons during the previous year.
- d. Post the City of Madera Transit Services Title VI Policy and LEP plan on the City of Madera website, <https://www.madera.gov/home/departments/transit/>
- e. Require all transit operator contracts to include the following clause:
"Personnel: CONTRACTOR shall employ and supervise all personnel, including drivers, dispatchers, managers, customer service representative and other personnel needed to operate and maintain the service provided by CONTRACTOR under this Agreement. Dispatchers and customer service representatives shall have some bilingual skills (communicate in Spanish and English, i.e., ability to understand simple directions, addresses and times). Consideration should be given to bilingual drivers who understand simple directions in English/Spanish. Qualified supervisory personnel shall be available during all hours of operation."
- f. 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 or qualified community volunteers.

LEP Safe Harbor

The Safe Harbor Threshold provision stipulates that for each LEP group that meets the LEP language threshold (5% or 1,000 individuals, whichever is less, of the total population or persons eligible to be served or likely to be affected or encountered) a recipient of FTA funds must provide written translation of vital documents for the non-English users. Further translation of non-vital documents, if needed, can be provided orally. If there are fewer than 50 persons in a language group that reaches the five percent (5%) trigger, the recipient is not required to translate vital written materials but should provide written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost. These safe harbor provisions apply to the translation of written documents only. They do not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable.

The City of Madera – Madera Metro complies with the Safe Harbor Threshold provisions, as evidenced by the number of documents translated in Spanish. With respect to Title VI information, the following shall be made available in Spanish:

- Title VI Public Notices
- Title VI Complaint Procedures
- Title VI Complaint Form

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In addition, the City of Madera will conduct marketing that incorporates translated materials that reach LEP persons. Vital bilingual or multilingual documents and key event include the following:

- Notices of free language assistance for person with LEP
- Notice of Non-Discrimination and Reasonable Accommodation
- Outreach Materials
- System Maps and Bus Schedules
- Route Changes
- Community Meetings
- Public Hearings
- Service Change Announcements
- Safety and Security Announcements

LEP Staff Training

The City of Madera ensures timely and reasonable language assistance to LEP utilizing several approaches. Customer service staff and other key staff are given instruction on (1) how to respond to an LEP caller request and (2) how to respond to written communication from an LEP person.

Instructions are provided to vehicle operators, supervisors and managers, and others who regularly interact with the public on how to respond to an LEP customer.

Options to Respond to LEP Persons

There are various ways in which the City of Madera transit staff can respond to LEP persons, whether in person, by telephone, or in writing. They include but are not limited to the following:

2. Provide writing translation of vital documents for eligible LEP language group(s) including, but not limited to:
 - Consent and complaint forms
 - Intake and application forms
 - Written notices of rights
 - Notice of denials, losses, or decreases in benefits or services
 - Notice of person's rights under Title VI
 3. Provide a bilingual Community Outreach Coordinator at community events and public hearings. City of Madera has personnel to provide Spanish interpretation.
 4. Place statements in notices and publications that interpreter services are available for these meetings.
 5. Survey bus drivers and other front-line staff, such as dispatchers, schedulers, and service development planners on their experience concerning any contacts with LEP persons during the previous year.
 6. Post City of Madera Title VI Policy and LEP plan on City of Madera Website,
<https://www.madera.gov/home/departments/transit/helpful-transit-information/#tr-city-of-madera-title-vi-policy-statement-245606>
-

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7. Access language assistance services from a professional translation service or qualified community volunteers when an interpreter is needed to ensure information is clearly presented, including public comments.
8. Provide on-going employee training to promote better understanding of the laws that prohibit discrimination on the basis of national origin and to ensure timely and reasonable language assistance to LEP populations. LEP sensitivity training will be conducted with staff (drivers, dispatch, and management) as part of employee training and orientation and refreshers classes to ensure staff work effectively with LEP populations and provide effective language assistance services.

Outreach Techniques

When staff prepares a document or schedules a meeting for which the target audience is expected to include LEP individuals, documents, meeting notices, flyers, and agendas will be printed in an alternative language based on the known LEP population. Interpreters will be available as needed. The City of Madera currently uses a variety of outreach approaches as described below.

1. Public Outreach Activities

The City of Madera website posts transit schedules and rider information. The City website provides material in both English and Spanish. The City also provides easy access to bilingual (English and

Spanish) administrative staff and drivers during operating hours to answer questions during their regular shift schedules for those LEP passengers who use the City's transit system.

The City also reaches out to the community directly through meetings with agency and community staff and their clients as needed. Information regarding the City's transit services is disseminated at these meetings, including schedules and appropriate fliers. Schedules also are made available at a variety of locations throughout the community and on all City transit buses. Staff utilizes different meeting sizes and formats, utilizes alternative advertising platforms and community interaction.

2. Public Meetings

The City of Madera conducts and participates in meetings that are open to the general public and can be scheduled at convenient times and accessible locations. The City collaborates with the Madera County Transportation Commission (MCTC), the Metropolitan Planning Organization (MPO), in its Unmet Transit Needs process. The Unmet Transit Needs hearings are accessible to the general public and are consistent with MCTC's comprehensive Public Participation Plan and process that ensure meaningful access to LEP throughout the service area. The MCTC public hearing is accessible by public transit services.

The City of Madera transit staff also participates in the development of the MCTC "Public Participation Plan." A series of meetings are conducted with participants from throughout the community. Recommendations to maximize community involvement are reflected in this plan and adopted by the MCTC Board.

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3. Participation in Community Activities

The City of Madera engages in community activities that promote its transit services. These activities and sites include:

- City of Madera Senior Centers
- Madera Annual District Fair
- Madera's Annual Pomegranate and Fruit Festival
- City of Madera Community Centers
- MCTC Annual Unmet Transit Needs Process
- Participation in updates to the Public Transit Human Services Transportation Coordination Plan for Madera County

Assurances

The City of Madera transit services will ensure that no person, on the grounds of race, color, national origin, as provided by Title VI of the Civil Rights Act of 1964, will be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination. Further, the City will notify the public

of protections against discrimination afforded them by Title VI Regulations and will take preventive corrective and disciplinary action necessary to reduce behavior that violate the rights and privileges the regulations are designed to protect.

The City will post information on its web site, Intermodal and Transit Facility as well as all transit buses and ensure that it reflects up to date information consistent with the requirements of 49 CFR Section 21.9(d).

Monitoring and Updating the LEP Plan

Madera will update the LEP as required by U.S. DOT. At a minimum, the plan will be reviewed and updated when more data from the 2010 U.S. Census is available, or when it is clear that higher concentrations of LEP individuals are present in the City of Madera transit services area. Updates will include the following:

- Documentation of LEP personal contacts.
- How the needs of LEP persons have been addressed.
- Determination of the current LEP population in the service area.
- Determination as to whether the need for translation services has changed.
- Determine whether local language assistance programs have been effective and sufficient to meet the need.
- Determine whether City of Madera transit financial resources are sufficient to fund language assistance resources needed.
- Determine whether City of Madera has fully complied with the goals of this LEP Plan.
- Determine whether complaints have been received concerning City of Madera transit services' failure to meet the needs of LEP individuals.

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Determination of Site or Location of Facilities

The City of Madera will not determine the location of projects requiring land acquisition and the displacement of persons from their residences and businesses on the basis of race, color, or national origin per Title 49 CFR, Section 21.9(b)(3). In determining the site or location of facilities, the City of Madera will not make selections with the purpose or effect of excluding persons from, denying them the benefits of, or subject them to discrimination.

Facilities include, but are not limited to, storage facilities, maintenance facilities, operation center, etc. A Title VI equity analysis will be undertaken before selection of a preferred site and outreach undertake to persons potentially impacted by the siting of facilities. Compliance with regulations, the City is also determined if other facilities with similar impacts in the area will result in any cumulative adverse impacts.

If a location is determined to have a disparate impact on the basis of race, color, or nation origin, the City of Madera may only locate the project in the selected location with substantial justification and where there are no alternative locations that would have a less disparate impact. Upon consideration and analysis of alternatives, the least discriminatory analysis will be implemented.

Availability of Title VI Plans and Procedures

The City of Madera LEP Plan and the Title VI Procedures are included in the City of Madera's website at <https://www.madera.gov/home/departments/transit/>. Any person or agency with internet access will be

able to access and download the plan from the City of Madera website. Alternatively, any person or agency may request a copy of the plan via telephone, fax, mail, or in person and shall be provided a copy of the plan at no cost. LEP individuals may request copies of the translated plan which the City of Madera will provide, if feasible. Questions or comments regarding the LEP Plan may be submitted to the City of Madera Grants Department, Transit Division, Title VI Coordinator:

City of Madera, Grants Department - Transit Division
Title VI Compliance Coordinator
205 W. Fourth Street
Madera, CA 93637

Phone: (559) 661-3693
Fax: (559) 674-2972
Email: dhuff@madera.gov

Section 7 | Monitoring Representation on Planning and Advisory Bodies

The City must describe efforts to encourage participation of minorities on committees, councils, or other bodies. City must provide a table of transit-related, non-elected planning boards, advisory councils or committees, or similar bodies, the membership of which is selected by the City, and must indicate the racial breakdown of the membership of such committees or councils.

Section 8 | Requirement to Develop System-Wide Standards and Policies

FTA requires all fixed-route transit providers to develop quantitative service standards and policies for their fixed-route service. Individual public transportation providers may set standards that best reflect their local environment.

The City has developed service standards and policies for its fixed-route system, Madera Metro, consistent with Title VI requirements. The standards are included in Exhibit G and include (a) vehicle load; (b) vehicle headways; (c) on-time performance; and (d) service availability.

SYSTEM-WIDE SERVICE STANDARDS MADERA METRO FIXED-ROUTE SYSTEM

Background

FTA requires all fixed-route transit providers of public transportation to develop quantitative standards for the following indicators. Individual public transportation providers may establish their own standards.

Definitions

- Vehicle load for each mode: Generally expressed as the ratio of passengers to the number of seats on a vehicle, relative to the vehicle's maximum load point. (For example, on a 40-seat bus, a vehicle load of 1.3 means all seats are filled and there are approximately 12 standees. Transit providers can specify vehicle loads for peak versus off-peak times, and for different modes of transit.)
- Vehicle headways for each mode: The amount of time between two vehicles traveling in the same direction on a given line or combination of lines.
- On-time performance for each mode: A measure of runs completed as schedules.
- Service availability for each mode: A general measure of the distribution of routes within an agency's service area.

Vehicle Load Standards

Vehicle load thresholds will be used to measure service effectiveness or to determine remediation. The average of all loads during peak AND off-peak operating periods should not exceed 1.0 (0% standees) on the fixed-route system.

Vehicle Load Standard	Vehicle Load Standard	Standees
Peak Period	1.0	0%
Off-Peak Period	1.0	0%

Driver is not required to delay departure or miss/skip a stop when vehicle load standard has been met. Drivers must instruct all passengers as they board that legally they must wear a seat-belt while riding the fixed route; however, if a passenger refuses or wishes to stand, the Driver may let them do so.

Vehicle Headway Standards

Vehicle headway is the time interval between vehicles on a route that allows passengers to gauge how long they will have to wait for the next vehicle. Like vehicle load, vehicle headway varies by mode and time of day. Vehicle headway will be determined by ridership and available resources to operate service.

Scheduling involves the consideration of several factors, including ridership, productivity, transit/pedestrian-friendly streets, density of transit-dependent population and activities, relationship to the Regional Transportation Plan, relationship to major transportation developments, land use connectivity, and transportation demand management.

Headway standards for fixed routes are as follows:

Route 1	30 minutes
Route 2	65 minutes
Route 3	30 minutes

On-Time Performance Standards

A vehicle is considered on time if it departs a scheduled timepoint no more than one minute early and no more than five minutes late. The City of Madera's on-time performance objective is 90% or greater for fixed route and Dial-A-Ride. The City of Madera continuously monitors on-time performance. System results are published and posted as part of monthly performance reports covering all aspects of operations.

Service Availability Standards

The City of Madera's service availability standards will strive to ensure that 90% of residents in the service area are within one-half mile of bus service. Like vehicle headways, the ability to provide increased service levels will be determined by ridership and available resources to operate service.

SYSTEM-WIDE SERVICE POLICIES MADERA METRO FIXED-ROUTE SYSTEM

Background

FTA requires that all providers of fixed-route public transportation develop qualitative policies for the following procedures:

- Vehicle Assignment
- Transit Amenities

Policies

Vehicle Assignment Policy

A vehicle(s) will be assigned to each of the Madera Metro Fixed-Route such that the average age of the fleet serving each route does not exceed over five years beyond the FTA useful life standard of the assigned vehicle type.

All vehicles will be equipped with air conditioning.

The capacity of vehicles will be matched to the operating characteristics of the route.

Transit Amenities Policy*

Transit amenities include shelters, benches, and signage. Installation of transit amenities along bus routes will be determined by factors such as ridership, boardings, individual requests, staff recommendations, and proximity to key origins and destinations. Consideration will be given to ensure amenities are being distributed throughout the transit system in an equitable manner; i.e., considering disparate impacts on the basis of race, color, or national origin, and taking corrective actions to remedy existing disparities to the maximum extent possible.

**The City Transit System is currently conducting a systems overhaul which will result in the redesign and restructuring of all Madera Metro Fixed-Route Systems, Signage, Schedules, System Maps, and the installment of digital signage and vehicle arrival technology.*

Section 9 | EXHIBITS

Exhibit A: Notice to the Public - English



CITY OF MADERA Madera Metro and Dial-A-Ride Title VI Notice & Complaint Process

The City of Madera is committed to ensuring that no person is excluded from participation in or denied the benefits of its services based on race, color, or national origin, as provided by Title VI of the Civil Rights Act of 1964. Any person who believes that he or she has been subjected to discrimination under Title VI based on race, color or national origin may file a Title VI complaint with the City within 60 calendar days from the date of the alleged discrimination.

Complaints may be filed with the City in writing and may be addressed to:

Transit Program Coordinator (Compliance Coordinator) – Grants Department
City of Madera
205 West Fourth Street
Madera, CA 93637

A copy of the Title VI Complaint Form (in English or Spanish) and additional information may be obtained from the City's web site at "www.madera.gov" (under "City Service - Transit – Additional Information – City of Madera Title VI Policy Statement) or by calling 559-661-3693. The City will provide appropriate assistance to complainants who are limited in their ability to communicate in English.



**CIUDAD DE MADERA
Madera Metro y Dial-A-Ride
Título VI Noticia y Proceso de Quejas**

La Ciudad de Madera, se compromete a garantizar que ninguna persona sea excluida de participar o denegar los beneficios de servicios basado por raza, color, linaje u origen nacional, según lo dispuesto en el Título VI de la Ley de Derechos Civiles de 1964. Cualquier persona que cree que él o ella ha sido objeto de discriminación en virtud del Título VI basado por raza, color u origen nacional puede presentar una queja del Título VI con la Ciudad dentro de 60 días del calendario a partir de la fecha de la supuesta discriminación.

Las quejas pueden ser presentadas en la Ciudad por escrito y pueden ser dirigidas a:

Coordinador del Programa de Tránsito (Coordinadora de cumplimiento)- Departamento de
Subvenciones
Ciudad de Madera
205 West Fourth Street
Madera, CA 93637

Una copia del Título VI Formulario de Queja (en Inglés o Español) y la información adicional se puede obtener desde el sitio web de la Ciudad en "www.madera.gov" (en "Servicio de la ciudad - Tránsito - Información adicional - Declaración de política del Título VI de la ciudad de Madera") o llamando al 559-661-3693. La Ciudad proveerá asistencia apropiada para los denunciantes que sean limitados en su capacidad de comunicarse en inglés.

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Exhibit C: Title VI Complaint Forms - English



City of Madera Transit System Civil Right Complaint

Title VI of the 1964 Civil Rights Act requires 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 following information is necessary to assist us in processing your complaint. Should you require any assistance in completing this form, please contact the Transit Program Manager at 559.661.3693. Complete and return this form to:

Transit Program Manager – Compliance Coordinator
205 W. 4th Street
Madera, Ca. 93638

1. Complainant's Name: _____

2. Address: _____

3. City: _____ State: _____ Zip Code: _____

4. Telephone (home): _____ (business): _____

5. Person discriminated against (if someone other than the complainant):

Name: _____

Address: _____

City: _____ State: _____ Zip Code: _____

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

- a. Race/Color o b. National Origin o c. Age o d. Gender o
e. Income o

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7. What date did the alleged discrimination take place?

8. In your own words, describe the alleged discrimination. Explain what happened and who you believe was responsible.

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: _____

Telephone Number: _____

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



Sistema de Tránsito de la Ciudad de Madera

Denuncia de derechos civiles

El Título VI de la Ley de Derechos Civiles de 1964 exige que: "Ninguna persona en los Estados Unidos, por motivos de raza, color u origen nacional, será excluida de la participación, se le negarán los beneficios o será objeto de discriminación bajo cualquier programa o actividad que reciba asistencia financiera federal."

La siguiente información es necesaria para ayudarnos a procesar su queja. Si necesita ayuda para completar este formulario, comuníquese con el Administrador del Programa de Tránsito al 559.661.3693. Complete y envíe este formulario a:

Gerente del Programa de Tránsito - Coordinador de Cumplimiento

205 W. 4th Street

Madera, Ca. 93638

1. Nombre del demandante: _____

2. Dirección: _____

3. City: _____ State: _____ Zip Code: _____

4. Teléfono (domicilio): _____ (empresa): _____

5. Persona discriminada (si alguien distinto del denunciante):

Nombre: _____

Dirección: _____

City: _____ State: _____ Zip Code: _____

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6. ¿Cuál de las siguientes opciones describe mejor la razón por la que cree que se produjo la discriminación? ¿Fue por tu culpa:

- a. Raza/Color o b. Origen nacional o c. Edad o d. Gender o
e. Ingresos o

7. ¿En qué fecha se produjo la presunta discriminación?

8. En sus propias palabras, describa la supuesta discriminación. Explica lo que pasó y quién crees que fue el responsable.

9. ¿Ha presentado este documento conforme con cualquier otra agencia federal, estatal o local, o con cualquier tribunal federal o estatal? Sí o No o

En caso afirmativo, marque cada casilla que corresponda:

Agencia federal o Tribunal federal o Agencia estatal o Tribunal estatal o
Agencia local o

10. Sírvanse proporcionar información sobre una persona de contacto en el organismo/tribunal en el que se presentó la denuncia.

Nombre: _____

Dirección: _____

City: _____ State: _____ Zip Code: _____

Número de teléfono: _____

11. Por favor, firme abajo. Puede adjuntar cualquier material escrito u otra información que considere relevante para su queja.

Complainant's Signature

Fechar

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Exhibit E: City of Madera – Madera Metro Public Participation Plan

Public Outreach Activities

The City of Madera web site posts Madera Metro and Dial-A-Ride schedules, notices, and surveys. The City's web site provides material in both English and Spanish. The City also provides easy access to bilingual (English and Spanish) administrative staff and drivers at the City's Downtown Intermodal Transit Center during operating hours to answer questions during their regular shift schedules for those LEP passengers who use the City's bus system.

The City reaches out to the community directly through meetings with agency and community staff and their clients, as needed. Information regarding the City's transit services is disseminated at these meetings, including schedules and appropriate fliers. Schedules also are made available at a variety of locations throughout the community and on the Madera Metro and Dial-A-Ride systems.

Public Meetings

The City conducts quarterly Transit Advisory Board (TAB) meetings that are open to the general public. The seven-member TAB is composed of diverse public citizens of the community and takes to public testimony prior to initiation of each meeting.

The City also collaborates with the Madera County Transportation Commission (MCTC), the Metropolitan Planning Organization (MPO), in its Unmet Transit Needs process. The Unmet Transit Needs hearings are accessible to the general public, offer bilingual translation, and are consistent with MCTC's comprehensive Public Participation Plan and process that ensures meaningful access to LEP throughout the Madera County region. The MCTC public hearing is accessible by Madera Metro Fixed-Route services or on Dial-A-Ride at no cost to passengers.

City transit staff also participates in the development of the MCTC "Public Participation Plan." A series of meetings are conducted with participants from throughout the community. Recommendations to maximize community involvement are reflected in this plan and adopted by the MCTC Board. The City considers and uses the MCTC Public Participation Plan as a blueprint for City to engage the public.

General Awareness Surveys

The City of Madera transit system conducts bilingual (English and Spanish) on-board rider and general awareness surveys. These personal one-on-one surveys allow riders to convey any concerns or comments they may have regarding Madera Metro Transit services.

Bilingual Outreach

The City of Madera transit system provide Spanish-speaking clients with bilingual information on public transit services. Staff assistance is utilized in outreach programs and offered for programs and public meeting, such as the Transit Advisory Board quarterly meetings.

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Telephone Access

Transit staff is available to answer questions in Spanish during normal operational hours (Monday – Friday: 7am – 6:30pm; Saturday: 7am – 4pm). Madera Metro transit system is accessible by phone at 559-661-RIDE (7433).

EMAIL

Customers may share their questions and concern through email by submitting to:

- transitinfo@madera.gov
- dhuff@madera.gov (Transit Program Manager)

Participation in Community Activities

The City engages in community activities that promote its transit services. These activities include transportation public workshops and outreach presentations where a broad cross-section of community can access information on the City transit system.

Strategies

To promote inclusive public participation, the City of Madera will leverage resources of the [Madera County Transportation Commission Public Participation Plan](#) and use its own resources available to employ the following strategies, as appropriate:

- Provide for early, frequent and continuous engagement by the public.
- Expand traditional outreach methods. Think outside the box: go to street fairs, faith-based institutions, libraries, etc.
- Select accessible and varied meeting locations and times
- Employ different meeting sizes and formats
- Provide childcare and food during meetings, if possible.
- Use social media in addition to other resources as a way to gain public involvement
- Use radio, television or newspaper ads on stations and in publications that serve LEP populations. Outreach to LEP populations may also include audio programming available on podcasts.

City of Madera Transit Services Limited English Proficiency (LEP) Plan

Introduction

This Limited English Proficiency (LEP) Plan has been prepared to address the City of Madera Grants and Transit Division's responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, Federal Transit Administration Circular 4702.1B dated October 1, 2012, which states that no person shall be subjected to discrimination based on race, color, or national origin.

Executive Order 13166, titled "Improving Access to Services for Persons with Limited English Proficiency" (65 FR 50121, Aug. 11, 2000), indicated that differing treatment based upon a person's inability to speak, read, write, or understand English is a type of national origin discrimination. It directs each federal agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discrimination does not take place. This order applies to all State and local agencies which receive federal funds.

Background

The City of Madera Grants Department and Transit Division administers the Madera Metro and Dial-A-Ride transit services that are operated by a contract service provider. The current transit service provider is MV Public Transportation, Inc.

The Madera City Council is the policymaking body for the system. A seven-member Transit Advisory Board (TAB) composed of residents appointed by the City Council, acts as a study and steering committee.

The City of Madera transit services (Madera Metro) consist of a Fixed Route and a Dial-a-Ride service (DAR). The City of Madera Grants Department and Transit Division has developed this LEP Plan to help identify reasonable steps for providing language assistance to persons with limited English proficiency who wish to access services provided by Madera Metro and Dial-A-Ride. As defined by Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write, or understand English.

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

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

5. The number or proportion of LEP persons in the service area who may be served or are likely to encounter the City of Madera transit programs, activities, or services.
6. The frequency with which LEP persons encounter City of Madera transit services programs, activities, or services.
7. The nature and importance of programs, activities, or services provided by the City of Madera transit services to the LEP population.
8. Resources available to the City of Madera Grants Department and Transit Division and overall cost to provide LEP assistance.

A summary of the results of the City of Madera transit services' four-factor analysis is in the following section.

Meaningful Access: Four-Factor Analysis

- 1. The number or proportion of LEP persons in the service area who may be served or are likely to encounter City of Madera transit programs, activities, or services.**

As the City of Madera population is below the 100,000-population threshold for full inclusion in the most recent American Community Survey (ACS), analysis is based on the 2020 US Census. City of Madera transit services staff reviewed the 2020 U.S. Census and determined that, out of a population of City of Madera 65,575 residents, 46,796 (78.3%) of City of Madera residents speak a language other than English. In the City of Madera 16,398 residents (26.7%) have limited English proficiency; that is, they speak English "not well" or "not at all". In the City of Madera, of those persons with limited English proficiency, the majority speak Spanish. The City's most current demographic analysis shows that the number or proportion of LEP served or encountered in the eligible service area is as follows:

Census Tracts

Description	5.02	6.01	6.02	8.0	9.0
Total Population	7,510	8,384	4,579	6,763	7,197
Hispanic/Latino	5,055	6,723	3,785	5,033	6,406
Percentage	67%	80%	83%	74%	89%

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2017 ACS sampling data that includes Madera, while less in-depth, can also be taken into consideration for analysis, and indicates that with a 2017 population estimate of 65,508 residents (63.4%) identified speaking a language other than English at home. Lastly, through staff contact, and feedback from the transit operator, it has been noted that not only is Spanish the primary language identified, but varying dialects of Spanish from different countries is also being experienced.

2. The frequency with which LEP persons come in contact with City of Madera transit services programs, activities, or services.

All transit services are provided in one or more of the above-referenced census tracts. A high percentage of Hispanic/Latino individuals therefore come into contact with the program. On-board ridership surveys conducted by the City reflect that 75 percent of riders utilize MAX or Dial-A-Ride services three to five days per week; 16 percent six to seven days per week; and 8 percent one to less than one day per week.

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

The largest geographic concentration of LEP individuals in the City of Madera transit services area is Spanish-speaking. On-board ridership surveys conducted by the City indicate that 83 percent are captive transit riders, and 30 percent could have made their trip by another means as a passenger. The main purposes indicated for trips were 61 percent for medical/dental; 50 percent for shopping; 42 percent for school; 20 percent for work; and 17 percent for other purposes including religious services and social outings.

4. The resources available to City of Madera Transit Division and overall cost to provide LEP assistance.

City of Madera transit staff has access to a variety of resources and collaborates with multiple organizations that help with outreach and providing LEP assistance at low or no cost. Community-based resources include:

- City of Madera Transit Advisory Board
- City of Madera Senior Centers
- City of Madera Intermodal Center
- City of Madera Transit Center
- Madera County Transportation Commission (MCTC) Social Services Transportation Advisory Committee (SSTAC)
- MCTC Board Unmet Transit Needs Process
- MCTC Public Participation Plan Committee
- Madera County Social Services Department
- Community Action Partnership of Madera County
- Camarena Health Center
- Grant-funded Consultant Services
- Translation Services

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The above community resources will continue to be used on a regular basis to assist in identifying needs of the City's LEP population. They will also serve to widely disseminate bilingual transit service information and announcements and to notify the LEP population of planned workshops and outreach efforts.

Based on the four-factor analysis, the City of Madera will develop its LEP Plan as outlined in the following section.

Identification of LEP Population

The Transit Division has developed several possible ways to assist in identifying LEP populations within the City, including:

4. Examine records to see if requests for language assistance have been received in the past, either at meetings or over the phone, to determine whether language assistance might be needed at future events or meetings.
5. Have a staff person greet participants as they arrive to City of Madera transit-sponsored events. By informally engaging participants in conversation it is possible to gauge each attendee's ability to speak and understand English.
6. Survey vehicle operators and other front-line staff, like dispatchers, dial-a-ride schedulers, and service development planners on their experience concerning any contacts with LEP persons.

Network with local human services organizations (such as Social Services and Public Health) to assist in identifying LEP groups and individuals most in need of LEP assistance and to further facilitate dissemination of information about Madera's transit.

Language Assistance Measures

There are plans for several language assistance options available to LEP persons, including both oral and written language services. There are also various ways in which City of Madera transit staff can respond to LEP persons, whether in person, by telephone, or in writing.

- g. Provide a bilingual City employee at community events, public hearings, and Transit Advisory Board (TAB) meetings.
- h. Placement of statements in notices and publications that interpreter services are available for these meetings.
- i. Annually survey bus drivers and other front-line staff, like dispatchers, Dial-A-Ride schedulers, and service development planners on their experience concerning any contacts with LEP persons during the previous year.

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- j. Post the City of Madera Transit Services Title VI Policy and LEP plan on the City of Madera website, <https://www.madera.gov/home/departments/transit/>
- k. Require all transit operator contracts to include the following clause:
“Personnel: CONTRACTOR shall employ and supervise all personnel, including drivers, dispatchers, managers, customer service representative and other personnel needed to operate and maintain the service provided by CONTRACTOR under this Agreement. Dispatchers and customer service representatives shall have some bilingual skills (communicate in Spanish and English, i.e., ability to understand simple directions, addresses and times). Consideration should be given to bilingual

drivers who understand simple directions in English/Spanish. Qualified supervisory personnel shall be available during all hours of operation.”
- l. 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 or qualified community volunteers.

LEP Safe Harbor

The Safe Harbor Threshold provision stipulates that for each LEP group that meets the LEP language threshold (5% or 1,000 individuals, whichever is less, of the total population or persons eligible to be served or likely to be affected or encountered) a recipient of FTA funds must provide written translation of vital documents for the non-English users. Further translation of non-vital documents, if needed, can be provided orally. If there are fewer than 50 persons in a language group that reaches the five percent (5%) trigger, the recipient is not required to translate vital written materials but should provide written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost. These safe harbor provisions apply to the translation of written documents only. They do not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable.

The City of Madera – Madera Metro complies with the Safe Harbor Threshold provisions, as evidenced by the number of documents translated in Spanish. With respect to Title VI information, the following shall be made available in Spanish:

- Title VI Public Notices
- Title VI Complaint Procedures
- Title VI Complaint Form

In addition, the City of Madera will conduct marketing that incorporates translated materials that reach LEP persons. Vital bilingual or multilingual documents and key event include the following:

- Notices of free language assistance for person with LEP
- Notice of Non-Discrimination and Reasonable Accommodation
- Outreach Materials
- System Maps and Bus Schedules

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- Route Changes
- Community Meetings
- Public Hearings
- Service Change Announcements
- Safety and Security Announcements

LEP Staff Training

The City of Madera ensures timely and reasonable language assistance to LEP utilizing several approaches. Customer service staff and other key staff are given instruction on (1) how to respond to an LEP caller request and (2) how to respond to written communication from an LEP person.

Instructions are provided to vehicle operators, supervisors and managers, and others who regularly interact with the public on how to respond to an LEP customer.

Options to Respond to LEP Persons

There are various ways in which the City of Madera transit staff can respond to LEP persons, whether in person, by telephone, or in writing. They include but are not limited to the following:

9. Provide writing translation of vital documents for eligible LEP language group(s) including, but not limited to:
 - Consent and complaint forms
 - Intake and application forms
 - Written notices of rights
 - Notice of denials, losses, or decreases in benefits or services
 - Notice of person's rights under Title VI
10. Provide a bilingual Community Outreach Coordinator at community events and public hearings. City of Madera has personnel to provide Spanish interpretation.
11. Place statements in notices and publications that interpreter services are available for these meetings.
12. Survey bus drivers and other front-line staff, such as dispatchers, schedulers, and service development planners on their experience concerning any contacts with LEP persons during the previous year.
13. Post City of Madera Title VI Policy and LEP plan on City of Madera Website, <https://www.madera.gov/home/departments/transit/helpful-transit-information/#tr-city-of-madera-title-vi-policy-statement-245606>
14. Access language assistance services from a professional translation service or qualified community volunteers when an interpreter is needed to ensure information is clearly presented, including public comments.
15. Provide on-going employee training to promote better understanding of the laws that prohibit discrimination on the basis of national origin and to ensure timely and reasonable

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language assistance to LEP populations. LEP sensitivity training will be conducted with staff (drivers, dispatch, and management) as part of employee training and orientation and refreshers classes to ensure staff work effectively with LEP populations and provide effective language assistance services.

Outreach Techniques

When staff prepares a document or schedules a meeting for which the target audience is expected to include LEP individuals, documents, meeting notices, flyers, and agendas will be printed in an alternative language based on the known LEP population. Interpreters will be available as needed. The City of Madera currently uses a variety of outreach approaches as described below.

9. Public Outreach Activities

The City of Madera website posts transit schedules and rider information. The City website provides material in both English and Spanish. The City also provides easy access to bilingual (English and

Spanish) administrative staff and drivers during operating hours to answer questions during their regular shift schedules for those LEP passengers who use the City's transit system.

The City also reaches out to the community directly through meetings with agency and community staff and their clients as needed. Information regarding the City's transit services is disseminated at these meetings, including schedules and appropriate fliers. Schedules also are made available at a variety of locations throughout the community and on all City transit buses. Staff utilizes different meeting sizes and formats, utilizes alternative advertising platforms and community interaction.

10. Public Meetings

The City of Madera conducts and participates in meetings that are open to the general public and can be scheduled at convenient times and accessible locations. The City collaborates with the Madera County Transportation Commission (MCTC), the Metropolitan Planning Organization (MPO), in its Unmet Transit Needs process. The Unmet Transit Needs hearings are accessible to the general public and are consistent with MCTC's comprehensive Public Participation Plan and process that ensure meaningful access to LEP throughout the service area. The MCTC public hearing is accessible by public transit services.

The City of Madera transit staff also participates in the development of the MCTC "Public Participation Plan." A series of meetings are conducted with participants from throughout the community. Recommendations to maximize community involvement are reflected in this plan and adopted by the MCTC Board.

11. Participation in Community Activities

The City of Madera engages in community activities that promote its transit services. These activities and sites include:

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- City of Madera Senior Centers
- Madera Annual District Fair
- Madera's Annual Pomegranate and Fruit Festival
- City of Madera Community Centers
- MCTC Annual Unmet Transit Needs Process
- Participation in updates to the Public Transit Human Services Transportation Coordination Plan for Madera County

Assurances

The City of Madera transit services will ensure that no person, on the grounds of race, color, national origin, as provided by Title VI of the Civil Rights Act of 1964, will be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination. Further, the City will notify the public of protections against discrimination afforded them by Title VI Regulations and will take preventive corrective and disciplinary action necessary to reduce behavior that violate the rights and privileges the regulations are designed to protect.

The City will post information on its web site, Intermodal and Transit Facility as well as all transit buses and ensure that it reflects up to date information consistent with the requirements of 49 CFR Section 21.9(d).

Monitoring and Updating the LEP Plan

Madera will update the LEP as required by U.S. DOT. At a minimum, the plan will be reviewed and updated when more data from the 2010 U.S. Census is available, or when it is clear that higher concentrations of LEP individuals are present in the City of Madera transit services area. Updates will include the following:

- Documentation of LEP personal contacts.
- How the needs of LEP persons have been addressed.
- Determination of the current LEP population in the service area.
- Determination as to whether the need for translation services has changed.
- Determine whether local language assistance programs have been effective and sufficient to meet the need.
- Determine whether City of Madera transit financial resources are sufficient to fund language assistance resources needed.
- Determine whether City of Madera has fully complied with the goals of this LEP Plan.
- Determine whether complaints have been received concerning City of Madera transit services' failure to meet the needs of LEP individuals.

Determination of Site or Location of Facilities

The City of Madera will not determine the location of projects requiring land acquisition and the displacement of persons from their residences and businesses on the basis of race, color, or national origin per Title 49 CFR, Section 21.9(b)(3). In determining the site or location of facilities, the City of Madera will not make selections with the purpose or effect of excluding persons from, denying them the benefits of, or subject them to discrimination.

Facilities include, but are not limited to, storage facilities, maintenance facilities, operation center,

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etc. A Title VI equity analysis will be undertaken before selection of a preferred site and outreach undertake to persons potentially impacted by the siting of facilities. Compliance with regulations, the City is also determined if other facilities with similar impacts I the area will result in any cumulative adverse impacts.

If a location is determined to have a disparate impact on the basis of race, color, or nation origin, the City of Madera may only locate the project in the selected location with substantial justification and where there are no alternative locations that would have a less disparate impact. Upon consideration and analysis of alternatives, the least discriminatory analysis will be implemented.

Availability of Title VI Plans and Procedures

The City of Madera LEP Plan and the Title VI Procedures are included in the City of Madera's website at <https://www.madera.gov/home/departments/transit/>. Any person or agency with internet access will be able to access and download the plan from the City of Madera website. Alternatively, any person or agency may request a copy of the plan via telephone, fax, mail, or in person and shall be provided a copy of the plan at no cost. LEP individuals may request copies of the translated plan which the City of Madera will provide, if feasible. Questions or comments regarding the LEP Plan may be submitted to the City of Madera Grants Department, Transit Division, Title VI Compliance Coordinator:

City of Madera
Grants Department - Transit Division
205 W. Fourth Street
Madera, CA 93637

Phone: (559) 661-3693
Fax: (559) 674-2972
Email: dhuff@madera.gov

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Transit-Related, Non-Elected Planning Boards, Advisory Councils or Committees

TITLE VI MEMBERSHIP OF TRANSIT-RELATED NON-ELECTED COMMITTEES AND COUNCILS

Body	Hispanic	Caucasian	African American	Asian American	Native American	Other
Population	78.6%	72.1%	3.2%	2.0%	1.1%	3.1%
*Transit Advisory Board (TAB) 7 members	40%	40%	0%	0%	10%	0%

** The Transit Advisory Board serves in an advisory capacity to the City Council and staff on transit matters, reviews transit system proposals, ensures grievance procedures for transit services are followed, and discusses overall transit planning and operating activities.*

Comprised of seven (7) members, all of whom serve four-year terms, members of the Transit Advisory Board are appointed by individual members of the Madera City Council and represent a cross section of the community (general public, children, elderly, disabled, students, social service agencies, and minority family).

SYSTEM-WIDE SERVICE STANDARDS MADERA METRO FIXED-ROUTE SYSTEM

Background

FTA requires all fixed-route transit providers of public transportation to develop quantitative standards for the following indicators. Individual public transportation providers may establish their own standards.

Definitions

- Vehicle load for each mode: Generally expressed as the ratio of passengers to the number of seats on a vehicle, relative to the vehicle's maximum load point. (For example, on a 40-seat bus, a vehicle load of 1.3 means all seats are filled and there are approximately 12 standees. Transit providers can specify vehicle loads for peak versus off-peak times, and for different modes of transit.)
- Vehicle headways for each mode: The amount of time between two vehicles traveling in the same direction on a given line or combination of lines.
- On-time performance for each mode: A measure of runs completed as schedules.
- Service availability for each mode: A general measure of the distribution of routes within an agency's service area.

Vehicle Load Standards

Vehicle load thresholds will be used to measure service effectiveness or to determine remediation. The average of all loads during peak AND off-peak operating periods should not exceed 1.0 (0% standees) on the fixed-route system.

Vehicle Load Standard	Vehicle Load Standard	Standees
Peak Period	1.0	0%
Off-Peak Period	1.0	0%

Driver is not required to delay departure or miss/skip a stop when vehicle load standard has been met. Drivers must instruct all passengers as they board that legally they must wear a seat-belt while riding the fixed route; however, if a passenger refuses or wishes to stand, the Driver may let them do so.

Vehicle Headway Standards

Vehicle headway is the time interval between vehicles on a route that allows passengers to gauge how long they will have to wait for the next vehicle. Like vehicle load, vehicle headway varies by mode and time of day. Vehicle headway will be determined by ridership and available resources to operate service.

Scheduling involves the consideration of several factors, including ridership, productivity, transit/pedestrian-friendly streets, density of transit-dependent population and activities, relationship to the Regional Transportation Plan, relationship to major transportation developments, land use connectivity, and transportation demand management.

Headway standards for fixed routes are as follows:

Route 1	30 minutes
Route 2	65 minutes
Route 3	60 minutes (30 minutes when newly purchased fleet vehicles are deployed)

On-Time Performance Standards

A vehicle is considered on time if it departs a scheduled timepoint no more than one minute early and no more than five minutes late. The City of Madera's on-time performance objective is 90% or greater for fixed route and Dial-A-Ride. The City of Madera continuously monitors on-time performance. System results are published and posted as part of monthly performance reports covering all aspects of operations.

Service Availability Standards

The City of Madera's service availability standards will strive to ensure that 90% of residents in the service area are within one-half mile of bus service. Like vehicle headways, the ability to provide increased service levels will be determined by ridership and available resources to operate service.

SYSTEM-WIDE SERVICE POLICIES MADERA METRO FIXED-ROUTE SYSTEM

Background

FTA requires that all providers of fixed-route public transportation develop qualitative policies for the following procedures:

- Vehicle Assignment
- Transit Amenities

Policies

Vehicle Assignment Policy

A vehicle(s) will be assigned to each of the Madera Metro Fixed-Route such that the average age of the fleet serving each route does not exceed over five years beyond the FTA useful life standard of the assigned vehicle type.

All vehicles will be equipped with air conditioning.

The capacity of vehicles will be matched to the operating characteristics of the route.

Transit Amenities Policy

Transit amenities include shelters, benches, and signage. Installation of transit amenities along bus routes will be determined by factors such as ridership, boardings, individual requests, staff recommendations, and proximity to key origins and destinations. Consideration will be given to ensure amenities are being distributed throughout the transit system in an equitable manner; i.e., considering disparate impacts on the basis of race, color, or national origin, and taking corrective actions to remedy existing disparities to the maximum extent possible.

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Exhibit F: City of Madera Fixed-Route Service and Dial-A-Ride Vehicle Assignment

CITY OF MADERA FIXED-ROUTE SERVICE AND DIAL-A-RIDE VEHICLE ASSIGNMENT

Unit #	Service	Year	Make	Model	Fuel Type	Bus Length - FT	ULB*
37	MAX	2012	Ford E-450	Elkhart	CNG	26	-1
38	MAX	2012	Ford E-450	Elkhart	CNG	26	-1
39	DAR	2012	Ford E-450	Elkhart	Gas	26	-1
40	DAR	2012	Ford E-450	Elkhart	CNG	26	-1
41	DAR	2012	Ford E-450	Elkhart	CNG	26	-1
43	DAR	2013	Ford E-450	Starcraft	CNG	26	0
44	MAX	2013	Ford E-450	Starcraft	CNG	26	0
45	MAX	2013	Ford E-450	Starcraft	CNG	26	0
46	DAR	2013	Ford E-450	Starcraft	CNG	26	0
47	MAX	2019	Ford E-450	Starcraft	Gas	26	8
48	DAR	2019	Ford E-450	Starcraft	Gas	26	8
49	MAX	2019	Chevy 4500	Arboc	Gas	26	8
50	MAX	2019	Chevy 4500	Arboc	Gas	26	8
51	MAX	2019	Chevy 4500	Arboc	Gas	26	8
52	MAX	2020	International	Starcraft	Diesel	32	9
53	MAX	2020	International	Starcraft	Diesel	32	9
54	MAX	2019	Aero Elite 320	EIDorado	CNG	32	9
55	MAX	2019	Ford F-550	EIDorado	CNG	32	9

*Useful Life Benchmark as of July 1, 2022