



City of Tracy TRACER
Title VI Plan
&
Limited English Proficiency Plan

TRACER Fixed Route & Paratransit Systems

2023

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City of Tracy TRACER Title VI Plan TRACER Fixed Route and Paratransit Systems

I. Plan Statement

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance.

Section 601 under Title VI of the Civil Rights Act of 1964 states the following:

“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.”

City of Tracy TRACER is committed to ensuring that no person is excluded from participation in or denied the benefits of its transit services on the basis of race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1B.

This plan was developed to guide the City of Tracy TRACER in its administration and management of Title VI-related activities.

Title VI Coordinator Contact Information

Jayne Pramod, Transit Coordinator
50 E. 6th Street
Tracy, California 95376
Phone: (209)831-6214
E-mail: jayne.pramod@cityoftracy.org

II. Title VI Information Dissemination

Title VI information posters shall be prominently and publicly displayed in the City of Tracy’s transit facility and on revenue vehicles. The name of the Title VI coordinator is available on the City of Tracy’s TRACER website, at www.ridetracer.com. Additional information relating to nondiscrimination obligation can be obtained from the City of Tracy TRACER Title VI Coordinator. The City of Tracy provides transit service through a Contractor, MTM Inc. (“Contractor”).

Title VI information shall be disseminated to City of Tracy’s TRACER employees and Contractor’s employees annually via the Employee Education form (see [Appendix A](#)). This form reminds employees of the City of Tracy’s policy statement, and of their Title VI responsibilities in their daily work and duties.

During New Employee Orientation, new employees shall be informed of the provisions of Title VI, and the City of Tracy TRACER expectations to perform their duties accordingly.

City of Tracy Transportation Division Employees and Contractor's General Manager shall be provided a copy of the Title VI Plan.

III. Subcontracts, Vendors and Sub-recipient

All subcontractors and vendors who receive payments from City where funding originates from any federal assistance are subject to the provisions of Title VI of the Civil Rights Act of 1964 as amended.

Written contracts shall contain non-discrimination language, either directly or through the bid specification package which becomes an associated component of the contract.

City of Tracy does not have any sub-recipients.

IV. Record Keeping:

The Title VI Coordinator will maintain permanent records, which include, but are not limited to copies of Title VI complaints or lawsuits and related documentation, records of correspondence to and from complainants, and Title VI investigations.

Since the last Title VI Plan submission, there have been no public transportation-related Title VI complaints, investigations, or lawsuits.

V. Title VI Complaint Procedures

How to file a Title VI Complaint?

The complainant may file a signed, written complaint up to one hundred and eighty (180) days from the date of the alleged discrimination. The complaint should include the following information:

- Your name, mailing address, and how to contact you (i.e., telephone number, email address, etc.)
- How, when, where and why you believe you were discriminated against. Include the location, names and contact information of any witnesses.
- Other information that you deem significant.

Verbal complaints will be accepted and transcribed by the Title VI Coordinator for any complainant unable to complete the form. Verbal complaints may be filed in person at City of Tracy Transit Station, 50 E. Sixth Street or by phone 209-831-6214.

A complainant may file a complaint directly with the United States Department of Transportation and/or the California Department of Transportation. If a complaint is filed with the City of Tracy TRACER and an external entity simultaneously, the external complaint may supersede the complaint to the City of Tracy and the internal complaint procedures will be suspended pending the external entity's findings.

Within 15 business days of receipt of a formal complaint, the Title VI Program Coordinator will send the complainant an acknowledgement letter and begin an investigation (unless the complaint is filed with an external entity first or simultaneously). The investigation will address complaints filed against transit service offered by the City of Tracy TRACER and will include discussion(s) of the complaint with all affected parties. City of Tracy TRACER will provide appropriate assistance to complainants who have difficulty with disabilities, or who are limited in their ability to communicate in English. Failure of the complainant to provide requested information within 15 business days of the date of the City of Tracy TRACER information request letter may result in the administrative closure of the complaint. The complainant may be represented by a representative of his or her choosing and may bring witnesses and present testimony and evidence in the course of the investigation.

The Title VI Complaint Form (see Appendix C) may be used to submit the complaint information. The complaint may be filed in writing with Jayne Pramod at the following address:

City of Tracy
Attn: Title VI Coordinator
Jayne Pramod, Transit Coordinator
50 E. 6th Street
Tracy, California, 95376

NOTE: City of Tracy TRACER encourages all complainants to certify all mail that is sent through the U.S. Postal Service and/or ensure that all written correspondence can be tracked easily. For complaints originally submitted by facsimile, an original, signed copy of the complaint must be mailed to the Title VI Coordinator as soon as possible, but no later than 180 days from the alleged date of discrimination.

What happens to the complaint after it is submitted?

All complaints alleging discrimination based on race, color or national origin in a service or benefit provided by City of Tracy TRACER will be directly addressed by City. City of Tracy TRACER shall also provide appropriate assistance to complainants, including those persons with disabilities, or who are limited in their ability to communicate in English. Additionally, City of Tracy TRACER shall make every effort to address all complaints in an expeditious and thorough manner.

A letter acknowledging receipt of complaint will be mailed within seven calendar days (Appendix D). Please note that in responding to any requests for additional information, a complainant's failure to provide the requested information may result in the administrative closure of the complaint.

How will the complainant be notified of the outcome of the complaint?

City of Tracy TRACER will send a final written response letter (see Appendix E or F) to the complainant. In the letter notifying complainant that the complaint is not substantiated (Appendix F), the complainant is also advised of his or her right to 1) appeal within seven calendar days of receipt of the final written decision from City of Tracy, and/or 2) file a complaint externally with the appropriate federal agency. Every effort will be made to respond to Title VI complaints within 60 working days of receipt of such complaints, if not sooner.

Once sufficient information for investigating the complaint is received by City of Tracy, a written response will be drafted subject to review by the City attorney. If appropriate, City of Tracy attorney may administratively close the complaint. In this case, City of Tracy TRACER will notify the complainant of the action as soon as possible.

In addition to the complaint process described above, a complainant may file a Title VI complaint with the following office:

Federal Transit Administration (FTA)
Region IX
Attention: Title VI Coordinator
201 Mission Street, Suite 1650
San Francisco, CA 94105

VI. Limited English Proficiency (LEP) Plan

Please see 'Appendix L: City of Tracy TRACER Limited English Proficiency Plan'.



Appendix A: Employee Annual Education Form

Title VI Policy

Policy:

City of Tracy TRACER is committed to ensuring that no person, on the basis of race, color, national origin, will be excluded from participation in or subjected to discrimination in the level and quality of transit services or related benefits provided by the City of Tracy TRACER employees, affiliates, and contractors.

No person shall, on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.

All employees of the City of Tracy TRACER and its affiliates are expected to consider, respect, and observe this policy. Citizen questions or complaints shall be directed to City of Tracy Title VI Coordinator.



Appendix B: Acknowledgement of Receipt of Title VI Plan

I hereby acknowledge receipt of the City of Tracy TRACER Title VI Plan. I have read the plan and am committed to ensuring that no person is excluded from participation in, or denied the benefits or services delivered by the City on the basis of race, color, or national origin, as protected by Title VI.

Your signature

Print your name

Date

Appendix C: TITLE VI COMPLAINT FORM



City of Tracy TRACER
Title VI & Related Statutes Discrimination Complaint Form

SECTION 1

Name of Complainant: _____

Mailing Address: _____

City: _____ State: _____ Zip Code: _____

Phone: (_____) _____ E-mail: _____

What is the most convenient time for us to contact you about this complaint? _____

☐ Citizen ☐ Employee ☐ Applicant ☐ Vendor

Accessible format requirements? ☐ Large print ☐ Audio tape ☐ Other: _____

SECTION 2

Are you filing this complaint on your own behalf? Yes/ No

If you answered yes to this question, go to Section 3.

If not, please supply your name and your relationship to the person for whom you are complaining:

Name: _____ Relationship: _____

Please explain why you have filed for a third party:

Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of the third party: Yes/ No

SECTION 3

I believe the discrimination I experienced was based on (check all that apply):

☐Race ☐Color ☐National Origin: _____

Date of Occurrence: _____

Location of Occurrence: _____

Please include the earliest and most recent dates of discrimination.

Name(s) & Title(s) of the person(s) I believe discriminated against me:

The action or decision which caused me to believe I was discriminated against is as follows:

(Please explain as clearly as possible what happened and why you believe your benefits were denied, delayed, or affected. Include how other persons were treated differently from you. Attach additional page(s), if necessary)

Please list any and all witness names and phone numbers:

Please state the remedy or action you are seeking for the alleged discrimination:

The law prohibits retaliation against anyone because he/she has taken action, or participated in an action, to secure rights protected by these laws. If you feel you have been retaliated against (separate from the discrimination alleged above), please explain the circumstances below:

SECTION 4

Have you previously filed a Title VI & Related Statutes complaint with this agency?

☐ Yes ☐ No

SECTION 5

Have you filed, or intend to file, this complaint with any other Federal, State, or local agency, or with any Federal or State Court?

☐ Yes ☐ No

If yes, check all that apply:

☐ U.S. Equal Employment Opportunity Commission ☐ Dept. of Fair Employment & Housing
☐ Federal Highway Administration/ U.S. Dept. of Transportation (USDOT) ☐ Federal Transit Administration/USDOT ☐ Federal or State ☐ Court Local Agency

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

Name: _____ Title: _____

Agency/Court: _____

Address: _____

Telephone Number: _____

Date Filed: _____ Case Number: _____ Date of Trial/Hearing _____

You may attach additional written materials or other information you think is relevant to your complaint.

Note: The use of the complaint form is not mandatory. You may submit your complaint in any form that includes your signature. Please sign and date the complaint form below.

I certify that the above information is true and correct to the best of my knowledge.

Signature: _____ Printed Name: _____ Date: _____

Please return to:

Jayne Pramod

City of Tracy Title VI Coordinator

50 E. Sixth Street

Tracy, CA 95376

ADA Notice: Upon request, reasonable accommodation will be provided in completing this form, or copies of the form will be provided in alternative formats. Contact the ADA / Section 504 Coordinator at the address listed above, via telephone (209) 831- 6214 or via fax (209) 836 – 8955 or via e-mail at Jayne.pramod@cityoftracy.org



Ciudad de Tracy
Formulario de Queja de Título VI Estatutos Relacionados

AVISO DE INFORMACIÓN PERSONAL

De acuerdo con la Ley de Información Confidencial Federal (P.L. 93-579) y el Acto de Prácticas de Información de 1977 (Secciones de Código daes Civiles 1798, y seq.), el aviso es por este medio dado para la petición de la información personal por esta forma. La información personal solicita voluntaria. El objetivo principal de la información voluntaria es facilitar el procesamiento de esta forma. La falta de proporcionar toda o cualquier parte de la información solicitada puede retrasar el procesamiento de esta forma. Ninguna revelación de la información personal será hecha a menos que no permisible bajo el Artículo 6, la Seccion 1798.24 del IPA de 1977. Cada individuo tiene el derecho sobre petición e identificación apropiada, inspeccionar toda la información personal en cualquier registro mantenido en el individuo por una identificación particular.

SECCIÓN 1

Nombre de

Demandante: _____

Domicilio: _____

Ciudad: _____ Estado: _____ Código postal: _____

Teléfono: (_____) _____

E-mail: _____

☐ Ciudadano ☐ Empleado ☐ Solicitante ☐ Vendedor

¿Requisitos de formato accesible? ☐ Letra grande ☐ Cinta de audio ☐ Otros:

SECCIÓN 2

¿Está presentando esta queja por si mismo? ☐ Sí ☐ No

Si respondió sí a esta pregunta, vaya a la sección 3.

Si no es así, por favor proporciones el nombre y el parentesco con la persona por la cual presenta su queja:

Nombre: _____

Parentesco: _____

Por favor explique por qué está declarando por un tercero:

Por favor confirme que ha obtenido la autorización de la parte perjudicada si está presentando en nombre de un tercero: ☐ Sí ☐ No

SECCIÓN 3

Yo creo que la discriminación que experimenté fue basado en (marque todo lo que corresponda):

☐ Raza ☐ Color ☐ Origen nacional: _____

Fecha del hecho: _____

Lugar del hecho: _____

Por favor, incluya las fechas más tempranas y más recientes de discriminación.

Nombre(s) y oficio(s) de la(s) persona(s) que creo me discriminaban:

La acción o decisión que me llevó a creer que fui discriminado es lo siguiente:

(Por favor explica tan claramente como posible lo que ocurrió y la razón que usted cree que sus beneficios fueron negados, diferidos o afectados. Incluya información sobre como otras personas fueron tratada en una manera diferente de usted. Puede adjuntar páginas adicionales, si es necesario.)

Por favor escriba los nombres y los números de teléfono de cualquier o todos los testigos:

Por favor indique lo que usted piensa ave debería hacerse para resolver la queja:

Las leyes prohíben represalias contra cualquier persona porque él/ella ha tomado medidas, o participado en una acción, para garantizar los derechos protegidos por estas leyes. Si usted siente que ha sido víctima de represalias (separada de la discriminación alegada arriba), explique las circunstancias siguientes:

SECCIÓN 4

¿Ha presentado previamente una queja de Título VI y Estatutos Relacionados con esta agencia?
☐Sí ☐No

SECCIÓN 5

¿Ha presentado esta queja con otra agencia Federal, Estatal o Local o con cualquier Corte Federal o Estatal? ☐Yes ☐No

En caso que sí, marque lo que corresponda:

☐Comisión de Igualdad de Oportunidades en el Empleo ☐Dept. de Empleado y Alojamiento Justo
☐Administración de Carretera Federal/Departamento de Transportación de EE.UU. (USDOT)
☐Administración de Tránsito Federal de EE.UU. /USDOT ☐Corte Federal o Estatal ☐Agencia Local

Por favor proporcione información sobre una persona de contacto en la agencia/tribunal donde se presentó la queja:

Nombre: _____

Título: _____

Agencia/Corte: _____

Domicilio: _____

Número de teléfono: _____

Fecha archivado: _____ Número de caso: _____

Fecha de juicio: _____

Puede agregar materiales escritos adicionales o otra información que considere relativa a su queja.

Nota: El uso de la forma de queja no es obligatorio. Usted puede presentar su queja en cualquier forma que incluya su firma. Por favor, firma y fecha el formulario de queja a continuación.

Certifico que la información mencionada es verdadera y correcta a mi conocimiento.

Firma: _____ **Nombre escrito:** _____

Fecha: _____

Por favor enviar a:

Jayne Pramod, City of Tracy Title VI Coordinator

50 E. Sixth Street

Tracy, CA 95376

A petición, ajustes razonables serán proporcionados para completar este formulario, o se proporcionará copias del formulario en formatos alternativos. Póngase en contacto con el Coordinador del ADA/Sección 504 en la dirección mencionada anteriormente, a través del teléfono (209) 831 -6214 o por correo electrónico Jayne.pramod@cityoftracy.org



Appendix D: Letter Acknowledging Receipt of Complaint

Today's Date

Ms. Jane Doe
1234 Main St.
Tracy, CA 95376

Dear Ms. Doe:

This letter is to acknowledge receipt of your complaint against the City of Tracy TRACER alleging

An investigation will begin shortly. If you have additional information you wish to convey or questions concerning this matter, please feel free to contact this office by telephoning (209) 831-6214, or write to me at this address.

Sincerely,

Jayne Pramod, Transit Coordinator
Title VI Coordinator

Appendix E: Letter Notifying Complainant that the Complaint Is Substantiated



Today's Date

Ms. Jane Doe
1234 Main St.
Tracy, CA 95376

Dear Ms. Doe:

The matter referenced in your letter of _____ (date) against the City of Tracy TRACER alleging Title VI violation has been investigated.

(An/Several) apparent violation(s) of Title VI of the Civil Rights Act of 1964, including those mentioned in your letter (was/were) identified. Efforts are underway to correct these deficiencies.

Thank you for calling this important matter to our attention. You were extremely helpful during our review of this matter. *(If a hearing is requested, the following sentence may be appropriate.)* You may be hearing from this office, or from Federal authorities, if your services should be needed during the administrative hearing process.

Sincerely,

Jayne Pramod, Transit Coordinator
Title VI Coordinator

Appendix F: Letter Notifying Complainant that the Complaint Is Not Substantiated



Today's Date

Ms. Jane Doe
1234 Main St.
Tracy, CA 95376

Dear Ms. Doe:

The matter referenced in your complaint of _____ (date) against the City of Tracy alleging _____ has been investigated.

The results of the investigation did not indicate that the provisions of Title VI of the Civil Rights Act of 1964, have in fact been violated. As you know, Title VI prohibits discrimination based on race, color, or national origin in any program receiving Federal financial assistance.

The City has analyzed the materials and facts pertaining to your case for evidence of the City's failure to comply with any of the civil rights laws. There was no evidence found that any of these laws have been violated.

I therefore advise you that your complaint has not been substantiated, and that I am closing this matter in our files.

You have the right to appeal this decision within seven calendar days of receipt of this final written decision from the City to the appropriate Federal agency.

Thank you for taking the time to contact us. If I can be of assistance to you in the future, do not hesitate to contact me.

Sincerely,

Jayne Pramod, Transit Coordinator
Title VI Coordinator



Appendix G: Notice to Beneficiaries

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides 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" (42 U.S.C. Section 2000d).

The City of Tracy is committed to ensuring that no person is excluded from participation in, or denied the benefits of services it provides on the basis of race, color, or national origin.

If you feel you are being denied participation in or being denied services provided by the City of Tracy, or otherwise being discriminated against because of your race, color, national origin, you may contact:

City of Tracy
Jayne Pramod, Transit Coordinator
50 E. 6th Street
Tracy, California 95376
Phone: (209)831-6214
Email: jayne.pramod@cityoftracy.org

If you, or someone you know, requires language assistance, please contact the Transit Coordinator listed above.



City of Tracy TRACER Public Participation Plan

PUBLIC PARTICIPATION

The City of Tracy Transit System, TRACER, has a Public Participation Plan for ensuring compliance with FTA requirements for a locally developed public participation process to allow, encourage and monitor citizen participation in transit decision-making process, with special attention paid to soliciting input from low-income, minority, and Limited English Proficient (LEP) populations that are traditionally under-represented. In addition, the City will ensure that all citizens are afforded the right to be involved in the public participation process regardless of race, color, national origin, as required by Title VI of the Civil Rights of 1964 and Related Statutes, or any other criteria prohibited by law.

City of Tracy recognizes the importance of participating in a wide variety of public meetings and workshops to share information about transit programs, activities, and services in order to collect information from users of TRACER bus services. A summary of Outreach Activities performed in this reporting is attached as **Appendix I**

It is through these conversations that transit staff receives input regarding transit issues and concerns from disadvantaged citizens, including senior citizens, minorities, low-income, and persons with physical or cognitive disabilities. All transit-sponsored meetings or activities are conducted in ADA accessible locations and have ready access to public transit services (fixed-route, paratransit and on-demand).

Information on public outreach meetings is widely disseminated on City of Tracy website, at the Transit Station, on the buses, and through social service agencies to maximize awareness that all transit users and interested citizens are welcomed as part of the decision making process.

Procedures for City of Tracy TRACER

The City of Tracy Transit System, TRACER, follows the public participation procedures outlined below to ensure that minority and Limited English Proficient (LEP)

Populations are included in Transit service decisions related to major service changes, fare increases and Program of Projects (POP).

A major change in service includes:

- Reduction in total system vehicle revenue hours of 25% or more;
- Elimination of service in an area with population of 2,000 or more;
- Elimination of service on one or more days of the week; or
- Changing the type of transit service in an area with population of 2,000 or more.

A fare increase includes:

- Increase in single ride fare type for any transit service; or
- Decrease in the discounts offered for fare categories.

Process

For any major service change or any fare increase as defined above, the City of Tracy will schedule a public hearing to present the proposed change(s) and obtain public comment. In addition, the City will present the proposed changes and request comments at the Social Services Transportation Advisory Committee (SSTAC) public meeting and Transportation Advisory Commission (TAC) public meeting. All public comments received will be addressed at the respective meeting to the extent possible. If it is not possible to address the comment at the meeting in which it is given, staff will give further evaluation to the comment and provide a recommendation.

The **Social Service Transportation Advisory Council (SSTAC)**, created by Senate Bill (SB) 498 to meet requirements in state law, advises the Board on transit related issues for traditionally under-represented and underserved populations such as the elderly, disabled, low-income, and minority (i.e. Black, Hispanic, Asian American, Native American/ Alaskan Native, and Pacific Islander) community groups. It annually participates in the identification of transit needs in the region via the Unmet Transit Needs process and makes recommendations to the Board in their annual unmet transit needs determination and finding. The SSTAC meets jointly with the ITC on a monthly basis. The meetings are generally scheduled for 3:00 PM on the Monday following the Board meeting. The meetings are open to the public. Meeting agendas can be found on SJCOG website <https://www.sjcog.org/> Membership of this committee is comprised of residents of San Joaquin County who are seniors, social service providers, transit users, and disabled. Members of SSTAC are appointed by the SJCOG Board.

Transportation Advisory Commission (TAC) appointed by City Council, to be advisors to the City Council, review or comment upon, address various public transportation issues, advise on service levels and routes. Recommend rules and procedures governing public transportation service programs, equipment and facilities considering regulatory guidelines, service improvements, coordination, efficiencies, protection of property, service improvements and activities of persons utilizing transportation service and facilities. Recommend rates, fares, user fees, charges and deposits for the use of transportation service programs and facilities. Review surveys and facilitate public input on public transportation programming and facility usage. Identify transportation infrastructure needs and recommend allocation of funds for capital expenditures related to transportation improvements. Review grants, budgets, facility developments and designs, and transportation programs. Advise the Council on the subject of comprehensive citywide public transportation master planning and development. Review, monitor, and make long-range recommendations concerning public transportation and connectivity sections of related environmental impact reports of development projects during the public review period and other similar documents. Recommend and promote marketing strategies for community outreach programs in order to strengthen the transportation image, increase usage, and integrate its role within the community. Recommend to the Council, after public input, the adoption, amendment or repeal of ordinances, resolutions, or requirements pertaining to public transportation within the City. Meetings are held on the second Thursday of each month, at the Tracy Transit Station, 50 E. Sixth Street, Tracy, California. The agendas for the advisory committees are posted at City Hall, Tracy Transit Station and Tracy Library at least 72 hours before the meeting. Also, the agenda and the staff report package is posted on our website at www.cityoftracy.org and copies are made available at the Tracy Transit Station office during typical business hours. TAC meetings are held outside of typical

business hours to provide the greatest opportunity for members of the public to participate. Time is available at the beginning of each TAC meeting for public to address issues not on the agenda. In addition, the public is provided the opportunity to address the Commission on each agenda item after staff has provided the staff report. A list of the TAC members is provided on the City website (www.cityoftracy.org)

TRANSPORTATION ADVISORY COMMISSION MEMBERS

Gary Cooper
Appointed: April 17, 2019
Term Expires: April 30, 2025
Race: African American

Tim Silva
Appointed: December 3, 2013
Term Expires: April 30, 2026
Race: Caucasian

Maurice Francis
Appointed: October 5, 2022
Term Expires: April 30, 2025
Race: Asian

Sharanjit Dhillon
Appointed: May 19, 2021
Term Expires: April 30, 2025
Race: East Indian

Rajpal Dhillon
Appointed: May 1, 2022
Term Expires: April 30, 2026
Race: East Indian

Brown Act (Government Code sections 54950-54962)

Transportation Advisory Commission meetings must comply with the Ralph M. Brown Act (Brown Act), which governs all public meetings and actions of governing boards or local and regional public agencies and their created bodies. Requirements of the Brown Act also apply to any committee or other subsidiary body of a local or regional agency, whether permanent or temporary, decision making or advisory, which is created by such a governing board. The Brown Act sets minimum standards for open meetings relative to access to the public, location of meetings, notice posting, agenda distribution, and public input. It is City of Tracy's aim to achieve and exceed these minimum requirements.

The primary source of service and fare changes will be the Short Range Transit Plan and its approval will fulfill these requirements. Consistent with all City public hearings, legal notice of public hearings will be published in a local newspaper of general distribution at least 14 days prior to the public hearing. Additional notices will be placed at City Hall, City of Tracy Transit Station, on transit vehicles, and on the City's Transit webpage (www.ridetracer.com). The public hearing will be scheduled at a time and place accessible to and convenient for the general public to attend. A staff person will record and prepare formal minutes of the public hearing.

Program of Projects

San Joaquin Council of Governments (SJCOG) is the Metropolitan Planning Organization for San Joaquin County. The City of Tracy relies on SJCOG's public participation process to satisfy its public participation requirements for the Program of Projects (POP). SJCOG has a Public Participation Plan that was adopted by the SJCOG Board on April 24, 2014. SJCOG provides outreach to a number of minority and Limited English Proficient organizations, including but not limited to:

African American Chamber of Commerce of San Joaquin County

Asian Pacific Self-Development Residential Association

California Miwok Tribe

California Tribal Partnership

Candelaria American Indian Council

Central Valley Asia-American Chamber of Commerce

El Concilio (Council for the Spanish-Speaking)

Lao Family Community of Stockton, Inc.

Lao Khmu Association, Inc.

NAACP, Stockton Branch

San Joaquin Hispanic Chamber of Commerce

United Cambodian Families

Vietnamese Voluntary Foundation (VIVO)

The City of Tracy will work with these organizations, as well, as part of its outreach.

Outreach to Engage Minority and Limited English Proficient Populations

The City of Tracy will continue assessing the language needs of citizens in its service area through its Language Assistance Plan (LAP), which is described in greater detail in a subsequent section of this Title VI program. To the greatest extent possible, to elicit public participation from minority and Limited English Proficient (LEP) populations, the City will engage in one or more of the following outreach activities:

Public outreach may include attending already existing community meetings and gatherings, such as school meetings, faith-based events, and other community activities in order to invite participation from LEP populations who may not attend hosted public events.

The City will ensure that non-English language interpretation will be available at any public meeting or workshop, as is appropriate and necessary.

Notices will be bilingual, or Spanish language notices will be developed and posted concurrently with English notices, as deemed necessary.

The City will distribute event information to community groups and agencies that work with LEP populations, if such contacts exist.

The City will contract to provide language assistance or interpretation services for customers that are non-English speaking, as deemed necessary.

Outreach techniques

Engaging minority and Limited English Proficiency (LEP) populations can be challenging. Below is a list of outreach techniques that the City of Tracy TRACER will use to actively solicit public input in the planning process of a project.

Public Meetings, Public Hearings, Open Houses & Focus Groups:

The City will host public meetings, public hearings, open houses and/or focus groups to discuss topics/projects of interest with the public. When hosting public meetings, the City will provide adequate notice to the public and follow all federally and state prescribed guidelines regarding public comment periods. At meetings, the City will utilize visualization aides such as power points and maps to assist the public in understanding the topics addressed.

City of Tracy TRACER public meetings, public hearings, open houses and focus groups will be scheduled at a time and place accessible to and convenient for the general public to attend. A staff person will record and prepare formal minutes of the public hearing.

Notices to the Public:

The City will include notations in public notices in appropriate non-English languages that provide a contact through which the individual can be informed in their language of the process/project, and the individual will have the opportunity to provide input.

Notice of TRACER public hearings will be published in accordance with the City of Tracy's agenda publication guidelines for public meetings. Additional notices will be placed at City Hall, posted at the Tracy Transit Station and on the City's webpage (www.cityoftracy.org & www.ridetracer.com)

Website: The City of Tracy and TRACER website offers a user-friendly structure and linguistic style understandable to lay people interested in projects and the planning process.

Language Identification Cards: Members of the public may identify their language needs to staff by pointing to their language on the City's language identification cards. These cards will be available at public meetings and with reservationists at Tracy Transit Station.

Since the City of Tracy's submission of its last Title VI Program, the City has not had a major service change or fare increase. However, the City has provided outreach to Limited English Proficient populations by providing the following:

- "Language Identification Flash cards" at public meetings and with reservationists at Tracy Transit Station;
- Google Translate services on the City's transit website (www.cityoftracy.org or www.ridetracer.com)
- Google Translate tool on reservationist computers.

Appendix I: Outreach Efforts since Last Title VI Program Submission

Summary of Outreach Efforts				
Event	Date	Populations Represented	Items of Discussion	Outcome
City of Tracy Transportation Advisory Commission: monthly meetings, open to the public, Notices are posted in City Hall. Meetings have initial topics to address and are open to any area of concern brought up in the meeting.	Monthly	Local govt. representatives area residents, and Passengers	Agendas include transit funding decisions, impact of local projects, and transit service changes.	Forum provides opportunity for additional community oversight of decisions, presentation of more planning detail, and opportunity to address coordination issues across projects.
SJCOG Social Services Transportation Advisory Council - monthly meetings, open for public comment, which connect transportation planning staff, transit providers, and area social services.	Monthly	Local government representatives social service agency staff, advocacy group staff, and area residents	Agendas include public comment, transit impact on social programs, transit performance and policy changes, and discussion of funding opportunities.	Forum provides opportunity to discuss change impacts with local social services, coordinate changes with other transit providers, coordinate projects with other agencies, and address service issues.
Unmet Transit Needs- Tracy Public Hearing- to receive potential unmet transit needs from the public. two meetings 1) Tracy Transit Station 2) City Council	Annual/ Oct 16, 2018 Oct 15, 2019	Attendees included representatives of Transit agencies, disabled passengers, and low income passengers.	Concerns raised were: 1.Better intercity bus connection 2.Amenities at the bus stop	By the Unmet Transit Needs Assessment process definition neither of these issues were determined to be an unmet need reasonable to meet.

Farmers Market: Open House - Transit Commission (TAC) hosted a drop in open house at the City booth ,Downtown Farmer's Market Event on Saturdays.	Annual April 2018 to October 2018 April 2019 to October 2019	All local groups and ethnicities represented in this large community event.	Primary topics are basic transit use topics - how to plan a ride, how to locate stops, how to ride the bus. Last year, TAC also handed out Schedule brochures information on TAC and Unmet Transit Needs Public Hearing info	TAC members handed out Bus Ride Guides and guided members of the public in how to get questions answered, and how to participate TAC public meetings.
Senior Resource Fair	Annual May 4, 2018 May 3, 2019	Attendees included representatives of Transit agencies, local groups and seniors	Included topics on how to use public transportation and door to door paratransit service.	Public transit information given to seniors in attendance.
Short Reach Transit Plan	May 16 2018 Aug 22, 2018 Nov 8, 2018 May 21, 2019 July 11, 2019 Aug 20, 2019	Attendees included representatives of local groups, residents, seniors, disabled passengers, and low income passengers	Meeting topics included fixed route and paratransit service route design, local versus regional service, regional coordination, fare policy and rates, and technological enhancements	Completion of SRTP with input from the community.

Appendix J: System-Wide Service Standards



System-Wide Service Standards

Chapter IV of FTA Circular 4702.1B discusses the additional reporting requirements for recipients of FTA funding that operate fixed route transit service, in order to ensure that the agency complies with DOT Title VI regulations. The requirements only apply to fixed route service, not Paratransit Service. Per Circular 4702.1B definitions, “Fixed route refers to public transportation service provided in vehicles operated along pre-determined routes according to a fixed schedule.”

City of Tracy TRACER qualifies for a reduced level of Chapter IV reporting. If a fixed route transit provider does not operate 50 or more fixed route vehicles in peak service, the transit provider is only required to set system-wide standards and policies.

Outlined below are the system-wide service standards for TRACER.

1. Vehicle Load for Fixed Route Service

Vehicle Load is expressed as the ratio of passengers to the number of seats on a vehicle, relative to the vehicle’s maximum load point.

The City of Tracy will strive to have vehicle loads not exceed vehicles’ achievable capacities, which are 17 seats for 24-foot buses, 27 seats for 30-foot buses and 33 seats for the 35 foot Gillig. Standing passenger capacity can range for each type of vehicle. Regular weekday and weekend routes historically had very few standing passengers. During peak times, routes may require a small number of standees due to higher ridership numbers.

The City’s transit fleet consists of five (5) Gillig Low floor Diesel buses, one (1) MST II Freightliners, eight (8) cut-away vehicles. All are wheelchair accessible in compliance with the Americans with Disabilities Act (ADA) and all are equipped with bike racks.

TRACER rarely turns passengers away due to overcapacity.

1. Weekday Route peak and off peak load= 1.0 (33 passengers for 33 seats on 35 foot Gillig; 13 passengers for 13 seats on 24 foot cutaway vehicles; no standees)
2. Commuter Route peak load= 1.0 (Average of 26 passengers for 26 seats on Freightliner buses= no standees)
3. Commuter Route off-peak load= 1.0 (13 passengers for 13 seats on cutaway buses; no standees)
4. Weekend Route peak and off-peak load= 1.0 (33 passengers for 33 seats On 35 foot Gillig; no standees)

The chart below identifies the make and model of the vehicles used to provide fixed route service and their maximum load factor:

BUS	BUS LENGTH	YEAR	MAKE	Model	SEAT CAPACITY /WHEELCHAIR
2101	29 FEET	2021	GILLIG	G27E	26/3
2102	29 FEET	2021	GILLIG	G27E	26/3
2103	29 FEET	2021	GILLIG	G27E	26/3
2104	29 FEET	2021	GILLIG	G27E	26/3
2131	26 FEET	2020	CHEVY	ARBOC	19/3
2132	26 FEET	2020	CHEVY	ARBOC	19/3
2121	21 FEET	2020	FORD TRANSIT	GLAVAL	7/2
2122	21 FEET	2020	FORD TRANSIT	GLAVAL	7/2
2123	21 FEET	2020	FORD TRANSIT	GLAVAL	7/2
2124	21 FEET	2020	FORD TRANSIT	GLAVAL	7/2
2111	21 FEET	2020	FORD TRANSIT	NORCAL VAN	7/1
2112	21 FEET	2020	FORD TRANSIT	NORCAL VAN	7/1
1701	35 FEET	2017	GILLIG	G27B	33
1702	35 FEET	2017	GILLIG	G27B	33
1703	35 FEET	2017	GILLIG	G27B	33
1704	35 FEET	2017	GILLIG	G27B	33
1705	35FEET	2017	GILLIG	G27B	33

2. Vehicle headways for each mode

Vehicle headway is the amount of time between two vehicles traveling in the same direction on a given line or combination of lines. Vehicle headways are measured in minutes; service frequency is measured in vehicles per hour. Headways and frequency of service are general indications of service provided along a route.

City of Tracy's fixed routes A and B vehicle headways are approximately 40 minutes for regular weekday Service; therefore vehicle frequency per route during weekdays is 2 vehicles per hour. Routes C and D on weekdays are 1.0 hour; therefore vehicle frequency per route during weekdays and is 1 vehicle per hour.

Routes A, B, C and D vehicle headways on weekends are every 1.0 hour; therefore vehicle frequency per route during weekends is 1 vehicle per hour.

Weekday Commuter routes, which run in the morning and afternoon, operate during the busiest times of the day and serve work and school commuters. Morning times are from 5:00am to 8:30am; afternoon times are from 3:15pm to 5:10pm.

Commuter Routes E, F and G: 1 hour headway; 2 runs per route; therefore vehicle frequency is 3 vehicles per hour.

City of Tracy will look at increasing frequency and shortening headway times in the future on routes that have higher loads.

3. On-time performance for each mode:

On-time performance is a measure of runs completed as scheduled. Below are City of Tracy performance standards for all fixed routes, per the transit operations contract:

On-Time Departures:

City buses shall depart no more than 5 minutes late from any scheduled and published departure time. Contractor shall strive to meet a minimum of 95% of bus departures within zero to 5 minutes after published or scheduled time points.

Operating Ahead of Schedule:

No bus shall depart a designated time point prior to its scheduled departure time.

Missed Trips:

Contractor shall, at a minimum, complete 100% of all scheduled trips on a monthly basis. Any fixed route trip operating 15 minutes or more behind the scheduled time shall be considered a “missed trip”. Failure to Pick up Passenger: Contractor shall not fail to pick up any passenger waiting at a designated bus stop.

4. Service availability for each mode

Service availability is a general measure of the distribution of routes within a transit provider’s service area.

Eighty (80) percent of all residents in the service area are within a one-quarter mile walk of all regular Weekday, Express and Weekend transit bus stops.



System-Wide Service Policies

The Federal Transit Administration (FTA) requires that all fixed route public transit providers develop *qualitative* standards for the following indicators that are applicable specifically to the transit provider's system. They apply agency-wide rather than industry-wide.

Transit Amenities Policy

Transit amenities refer to items of comfort, convenience, and safety that are available to the general riding public. Fixed route transit providers must set a policy to ensure equitable distribution of transit amenities across the system. This requirement applies after a transit provider has decided to fund an amenity. Transit amenities may include: seating (benches, seats at stops/stations); bus shelters; printed information (signs, system maps, schedules)

City of Tracy determines equitable locations of all transit amenities throughout the City. Locations of bus stop improvements including benches, bus shelters, trash cans, recycling containers, etc. are distributed equitably throughout all routes. Bus stop improvements will be given priority at locations that receive higher numbers of boarding and alighting or may need ADA improvements, but these will be made on a variety of routes throughout the City during each improvement cycle. These locations will be identified as part of the Short Range Transit Plan. In addition, transit amenities such as current Intelligent Transportation System (Automatic Vehicle Location) project will benefit all passengers regardless of fixed routes used.

Title VI Equity Analysis. The City of Tracy has not built and does not have a transit related facility in the planning stages and that would soon be under construction using Federal Transit Administration funding. A separate Title VI Equity Analysis would be prepared by a third-party consultant and will be submitted separate cover if applicable. Therefore, this section does not apply.

Vehicle Assignment Policy

Vehicle assignment refers to the process by which transit vehicles are placed into service and on routes throughout the transit provider's system.

Transit vehicles in Tracy will be assigned to routes based on ridership, type of route, and operating characteristics of buses, including bus length and turning radius.

Routes with lower ridership or that require tight turns on narrow streets may be assigned cutaway (24 foot) buses rather than the larger 35-foot buses, while Routes A B C will frequently be assigned a large bus to accommodate ridership.

City of Tracy will maintain its fleet and replace vehicles as required by FTA's minimum service life policy (10 years or 350,000 miles for 32 foot buses; 5 years or 150,000 miles for cutaway/24 foot) buses. Distribution of vehicles throughout the fixed route system will not be based on Age/condition but rather the needs for that particular route. All large buses and smaller cutaways are equipped with wheelchair ramps. In addition, all buses have bike racks and air conditioning.

Appendix L: Limited English Proficiency Plan



City of Tracy TRACER Limited English Proficiency Plan

Introduction

The purpose of this limited English proficiency policy guidance is to clarify the responsibilities of the City of Tracy TRACER, as a recipient of federal financial assistance from the U.S. Department of Transportation (DOT), of responsibilities to limited English proficient (LEP) persons, pursuant to Title VI of the Civil Rights Act of 1964 and implementing regulations. It was prepared in accordance with **Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq.**, and its implementing regulations provide that no person shall be subjected to discrimination on the basis of race, color, or national origin under any program or activity that receives federal financial assistance, and;

Executive Order 13166

Executive Order 13166 "Improving Access to Services for Persons With Limited English Proficiency," reprinted at 65 FR 50121 (August 16, 2000), directs each Federal agency that is subject to the requirements of Title VI to publish guidance for its respective recipients clarifying that obligation. Executive Order 13166 further directs that all such guidance documents be consistent with the compliance standards and framework detailed in the Department of Justice's (DOJ's) Policy Guidance entitled "Enforcement of Title VI of the Civil Rights Act of 1964--National Origin Discrimination Against Persons With Limited English Proficiency." (See 65 FR 50123, August 16, 2000 DOJ's General LEP Guidance). Different treatment based upon a person's inability to speak, read, write, or understand English may be a type of national origin discrimination.

Executive Order 13166 applies to all federal agencies and all programs and operations of entities that receive funding from the federal government, including state agencies, local agencies (such as the City of Tracy TRACER) and governments, private and non-profit entities, and sub recipients.

Plan Summary

The City of Tracy TRACER has developed this Limited English Proficiency Plan (LEP) to help identify reasonable steps to provide language assistance for LEP persons who seek meaningful access to City of Tracy TRACER services as required by Executive Order 13166. As defined by this order, a Limited English Proficiency person is one who does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English.

This plan details procedures on how to identify a person who may need language assistance, the ways in which assistance may be provided, staff training, how to notify LEP persons that assistance is available, and information for future plan updates.

In developing the plan, the City of Tracy TRACER undertook a U.S. Department of Transportation four factor LEP analysis which considers the following factors:

- 1) The number or proportion of LEP persons in the City of Tracy TRACER service area who may be served by or are likely to encounter a City of Tracy TRACER program, activity, or service;
- 2) The frequency with which LEP individuals come in contact with City of Tracy TRACER programs, activities, or services;
- 3) The nature and importance of the program, activity or service provided by the City of Tracy TRACER to the LEP population; and
- 4) The resources available to the City of Tracy TRACER and overall costs to provide LEP assistance.

A summation of these considerations is provided in the following section.

Four Factor Analysis

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

The City of Tracy TRACER examined the US Census *Selected Social Characteristics 2021 American Community Survey 5-Year Estimates*. According to the 2021 data, the population of Tracy household was 92,792. The population 5 years and over was 86,550 in 2021, or 93.3% of the household population. Using the percentages in Languages Spoken At Home from the *Selected Social Characteristics 2021 American Community Survey 5-Year Estimates*, the City of Tracy TRACER has determined the following about the City's population over age 5 in the service area:

- 53.5% or 49,624 people speak English only.
- Approximately 39.8% or 36,926 people speak a language other than English. 15% or an estimated 13,948 people speak English less than "very well".
- The largest proportion of non-English speaking language groups is Spanish: 22% or an estimated 20,369 people speak Spanish, and 7.3% or 6,762 of this language group speak English less than "very well".
- 9.1% or an estimated 8,478 people speak Other Indo-European languages, of this language group 3.8% or 3,567 people speak English less than "very well".
- 7.5% or an estimated 6,976 people speak Asian and Pacific Island languages, and of this language group 3.4% or 3,137 people speak English less than "very well".
- 1.2% or an estimated 1,103 people speak other languages, and of this language group, 0.5% or 482 people speak English less than "very well".

(See *Appendix M: Selected Social Characteristics: 2021 American Community Survey 5-Year Estimates, Tracy, CA*)

2. The frequency with which LEP individuals come in contact with City of Tracy TRACER program, activity, or service.

The City of Tracy TRACER assesses the frequency at which staff and drivers have or could possibly have contact with LEP persons. This includes documenting phone inquiries and verbally surveying drivers. The City of Tracy TRACER staff and drivers have multiple daily interactions with Spanish speaking passengers on all fixed routes. There have been requests for Spanish interpretation in the past, and the City of Tracy TRACER has accommodated these requests by posting all notices to passengers in both English and Spanish, providing bilingual fixed route and Paratransit information Guides, and ensuring that all phone recordings have a Spanish option. The Contractor (MTM, Inc.) has bilingual capabilities to accommodate any requests. Other language accommodations are being looked into, including Urdu. This is a less common language, but one that has been requested.

3. The nature and importance of the program, activity, or service provided by the City of Tracy TRACER to LEP community.

The City of Tracy TRACER makes every effort to provide rider surveys in Spanish in order to gather data on services that are important to LEP individuals. In addition, when an LEP individual makes a comment regarding service via the phone, the comment is documented.

The largest geographic concentration of LEP individuals in the City of Tracy TRACER service area are Spanish-speaking. This population is 23.2% of the population over 5 years of age, or an estimated population of 19,315 of this group. Those that speak English less than “very well” are 8.8% of the population or an estimated 7,312 people.

There are several social, service, professional and leadership organizations within the City of Tracy TRACER service area that focus on outreach or membership of these LEP individuals. The organizations include but are not limited to, El Concilio "Council for the Spanish Speaking" which serves San Joaquin and Stanislaus Counties; San Joaquin Hispanic Chamber of Commerce; Nueva Vida-New Life medical support program. Whenever outreach is needed, these agencies will be contacted to assisted in distributing information.

Of the other LEP populations, ‘Other Indo-European’ and ‘Asian and Pacific Island’ languages, the proportion of speakers who speak Spanish less than “very well” is much smaller than that of Spanish speakers. The City of Tracy Transit Division is looking into identifying the precise types of languages spoken so that it may provide translated materials to these populations as well.

4. The resources available to the City of Tracy TRACER and overall costs to provide LEP assistance.

The City of Tracy TRACER has assessed its available resources that could be used for providing LEP assistance. Because a large percentage of the riders have been identified as Spanish speaking, the City of Tracy uses a service to translate rider guides, posted flyers, and policies, among other necessary materials. The City of Tracy TRACER also requires that a Spanish-speaking staff member be available at the Tracy Transit Station during business hours. This individual handles reservations and assists customers at the customer service window. Either the City Staff or the Spanish-speaking Contract

employee hired by the Contractor updates materials as necessary.

The City of Tracy TRACER has also analyzed other types of translations that may be necessary, but has not had any requests for language translation other than Spanish. Should other translation services be required, the TRACER operations budget will fund the cost of such services.

After analyzing the four factors, the City of Tracy TRACER developed the plan outlined in the following section for assisting persons of limited English proficiency.

LIMITED ENGLISH PROFICIENCY PLAN OUTLINE

How the City of Tracy TRACER Staff may identify an LEP person who needs language assistance:

Examine records of requests for language assistance from past meetings and events to determine the possible need for assistance at future events;

When City of Tracy TRACER sponsored workshops or conferences are held, set up a sign-in sheet table, have a staff member greet and speak to each attendee to informally gauge their ability to speak and understand English. The staff member will ask a question that requires a full sentence reply to verify proficiency;

Have the Census Bureau's "Language Identification Flashcards" at City of Tracy TRACER events so that individuals can self-identify as needing translation assistance when the language is other than Spanish (which will be automatically provided). Although staff may not be able to assist at the meeting, they will be able to provide translated materials after the event, and the cards will be a tool to identify language needs for future meetings. Language Identification cards will also be available at the Tracy Transit Station lobby at the reception desk and will be used by reservationists;

Survey drivers and other first-line staff, such as dispatchers, on an annual basis at the beginning of each fiscal year regarding their experience on having any direct or indirect contact with LEP individuals.

Language Assistance Measures

The City of Tracy TRACER will implement the following LEP procedures:

- Census Bureau's "Language Identification Flashcards" will be located at the Customer Service window in Tracy Transit Station at all times.
- The computer(s) located at the Customer Service window in the lobby of Tracy Transit Station have an online translation tool added to the favorites listing for easy access via Microsoft Internet Explorer. Blocks of text can be translated and printed for the LEP customer to read. This will aid the staff in the interpretation of services on a one on one basis for LEP individuals visiting the Tracy Transit Station.

- If an individual is a Spanish-speaker, the City of Tracy TRACER has a Spanish-speaking Reservationist available at the Tracy Transit Station. This individual handles reservations and assists customers at the customer service window.
- When an interpreter is needed, in person or on the telephone, and the City of Tracy TRACER staff has exhausted the above options, staff will first attempt to determine what language is required. Staff will utilize the telephone interpreter service - Language Line Services at <http://www.language.com>. On the Language Line home page the staff will select the 'Need an Interpreter Now?' link and follow the directions to receive an access code.

City of Tracy TRACER Staff Training

All City of Tracy TRACER staff will be provided with the LEP Plan and will be educated on the following procedures. This information will also be part of the staff orientation process for new hires. Training topics are listed below:

- Understanding the Title VI policy and LEP responsibilities;
- Language assistance services the City of Tracy TRACER offers;
- Use of LEP “Language Identification Cards” for the Census Bureau;
- How to access the online Translation tool via the Customer Service computer in the Tracy Transit Station;
- How to use the "Language Line" interpretation and translation services;
- Documentation of language assistance requests;
- How to handle a Title VI and/or LEP complaint

Outreach Techniques

Since first draft of the City of Tracy TRACER LEP Plan, City of Tracy TRACER has a formal practice of outreach techniques. These include the following:

- When staff will be hosting a meeting or workshop, or will be presenting a pertinent topics, all meeting notices, flyers, advertisements, and agendas will be printed in Spanish, and an alternative language if it is determined that such language is necessary.
- When running a general public meeting notice, staff will state that a translator will be available in Spanish, or in another language as determined to be necessary. The included clause will be similar to, “A (insert alternative Language) translator will be available”. For example: “Un traductor del idioma español estará disponible”, or “A Spanish translator will be available”.

- In addition to the existing Spanish language translations of key print materials, the City of Tracy TRACER also provides translation of schedules and maps, and notices in languages other determined to be necessary, and made available at the Tracy Transit Station, and on board vehicles.

Monitoring and Updating the LEP Plan

This City of Tracy Transit System LEP Plan is designed to be easily updated. At a minimum, the City of Tracy TRACER will follow the Title VI Program update schedule for the LEP Plan of submission every 3 years.

Each update of the LEP Plan will examine plan components including:

- How many LEP persons were encountered annually?;
- Were the needs of these LEP persons met?;
- What is the current LEP population in the City of Tracy TRACER service area?;
- Is a change needed in the types of language translation services provided?;
- Is there still a need for continued language assistance for previously identified City of Tracy Transit System programs? Are there other programs that should be included?;
- Have the City of Tracy TRACER 's available resources, such as technology, staff, and financial costs changed?;
- Has the City of Tracy TRACER fulfilled the goals of the LEP Plan?; and
- Were any complaints received?

Dissemination of the City of Tracy TRACER Limited English Proficiency Plan

The City of Tracy TRACER will include the LEP plan on the City of Tracy website (www.ridetrapper.com) together with its Title VI Policy and Complaint Procedures. The City of Tracy TRACER Notice of Rights under Title VI to the public will be posted in the Tracy Transit Station, on all City of Tracy TRACER vehicles, and in selected printed materials also refers to the LEP Plan's availability.

Any person, including social service, non-profit, and law enforcement agencies and other community partners with internet access will be able to access the plan.

Copies of the LEP Plan will be provided, on request, to any person(s) requesting the document via phone, in person, by mail or email. LEP persons may obtain copies/translations of the plan upon request.

Any questions or comments regarding this plan should be directed to the City of Tracy TRACER Title VI Coordinator, as follows:

Jayne Pramod, City of Tracy Title VI Coordinator
50 E. 6th Street
Tracy, California 95376
Phone: (209) 831-6214
E-mail: jayne.pramod@cityoftracy.org

Appendix M

Selected Social Characteristics: 2021 American Community Survey 5-Year Estimates, Tracy, CA		
Estimated Total Household Population: 92,792		
Language Spoken at Home	Estimate	Percent
Population 5 years and over	86,550	93.3%
English only	49,624	53.5%
Language other than English	36,926	39.8%
<i>Speak English less than "very well"</i>	13,948	15%
<i>Spanish</i>	20,369	22%
<i>Speak English less than "very well"</i>	6,762	7.3%
<i>Other Indo-European languages</i>	8,478	9.1%
<i>Speak English less than "very well"</i>	3,567	3.8%
<i>Asian and Pacific Islander languages</i>	6,976	7.5%
<i>Speak English less than "very well"</i>	3,137	3.4%
<i>Other languages</i>	1,103	1.2%
<i>Speak English less than "very well"</i>	482	0.5%

Source: US CENSUS DATA City of Tracy California Selected Social Characteristics 2021 ACS 5-Year Estimates Data Profiles

Weblink: <https://data.census.gov/>