City of Monrovia Title VI Plan



Relating to Section 5309 & 5310 Funds

2019 UPDATE

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I. INTRODUCTION

"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. 2000d)

The City of Monrovia, as a recipient of Federal financial assistance, will ensure full compliance with Title VI of the Civil Rights Act of 1964, as amended and related statutes and regulations in City of Monrovia's Station Square Public Improvement Plan and improve transportation services to seniors and individuals with disabilities. The City used Section 5309 Federal funds for the construction and installation of passenger amenities and improvements in the Monrovia Transit Village. The City is being recommended for approval of Section 5310 Federal funds which will be used to enhance mobility of seniors and individuals with disabilities, increase service destinations for educational and medical purposes, and extend hours to accommodate a 24-hour daily on demand service to meet the current needs. The City of Monrovia provides, without regard to race, color, national origin, sex, age, disability or income level:

- Opportunities to participate in the transit planning and decision making processes; and,
- Fair decisions on the location of transit services and facilities.

These objectives are the basis for the City of Monrovia's Title VI Plan. The Plan that follows was updated in conformance with FTA C 4702.1B (October 1, 2012). The guidance in this document integrates the responsibilities to Limited English Proficient (LEP) Persons into the programs and activities developed under the Title VI regulations (49 CFR Part 21) to recipients of Federal financial assistance.

This program contains all of the elements required in the U.S. Department of Transportation Federal Transit Administration Title VI Circular dated October 1, 2012. It has been prepared using data from the most recent 2010 U.S. Census.

II. GENERAL REQUIREMENTS

1. Notification of Beneficiaries of Protection Under Title VI

In compliance with 49 CFR Section 12.9 (d), the City of Monrovia has provided information to the public regarding its Title VI obligations and apprises members of the public of the protection against discrimination afforded to them by Title VI on an on-going basis. This statement of nondiscrimination on the basis of race, color, national origin, sex, age, disability or income level has been made available on the City's website. The notice also includes contact information for requesting details on the City's Title VI obligations and the complaint procedure. The notice is in English, Spanish, and Chinese and available on the City webpage and at the City Hall front desk.

CIVIL RIGHTS NOTICE

The City of Monrovia is committed to ensuring that no person is excluded from participation in, or denied the benefits of, its service on the basis of race, color or national origin as provided under Title VI of the

Civil Rights Act. In addition to Title VI, the City also prohibits discrimination based on sex, age, disability, religion, medical condition, marital status or sexual orientation.

The City of Monrovia is committed to ensuring that the level and quality of transportation service is provided without regard to race, color, national origin, sex, age, disability, religion, medical condition, marital status or sexual orientation; promoting the full and fair participation of all potentially affected populations in transportation decision making; preventing denial, reduction, or delay in benefits related to programs and activities affecting minority and low-income populations; and providing meaningful access to City services, programs, and activities by persons with Limited English Proficiency (LEP).

To file a complaint or obtain additional information on the City of Monrovia's obligation regarding non-discrimination, please write to: City of Monrovia, City Manager's Office, 415 South Ivy Avenue, CA 91016.

HOW TO FILE A TITLE VI COMPLAINT

Any person who believes he or she may have been discriminated against on the basis of race, color, national origin, sex, age, disability, religion, medical condition, marital status, sexual orientation or English proficiency may file a complaint with the City of Monrovia's City Manager's Office.

The complaint must be filed within 180 days of the alleged discrimination date. Written complaints may be sent to City of Monrovia, 415 South Ivy Avenue, Monrovia, CA 91016, or an online complaint form may be accessed at City's website at http://www.cityofmonrovia.org/stationsquare/page/title-vi-civil-rights-notice.

Once completed, the complaint should be forwarded to City of Monrovia, City Manager's Office at 415 South Ivy Avenue, CA 91016.

In addition to utilizing the Civil Rights complaint process at the City of Monrovia, a Complainant may file a Title VI complaint concerning race, color or national origin discrimination with the Federal Transit Administration (FTA), Office of Civil Rights, Region IX, 201 Mission Street, Suite 1650, San Francisco, California 94105-1839.

Website Notification (in English, Spanish, and Chinese):

- ▶ Boards and Commissions Transparent Government
- City Manager's Office
- Administrative Services
- ▼ City Clerk's Office

Agendas

Public Records

Bids & RFPs

Elections

Municipal Code

Browse Documents

Title VI Civil Rights Notice

Birth Certificates

- Community Development
- Human Resources
- ▶ Library
- Parks
- Recreation
- Public Works
- Monrovia Renewal
- Fire Department
- Police Department

TITLE VI CIVIL RIGHTS NOTICE



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Civil Rights Notice

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How To File A Title VI Complaint

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Supporting Documents & Links

- Monrovia Title VI Plan (896 KB)
- · Complaint Form (109 KB)
- Complaint Form Spanish (80 KB)
- Complaint Form Chinese (248 KB)
- · Civil Rights Notice Spanish (57 KB)
- Civil Rights Notice Chinese (121 KB)

2. Title VI Complaint Procedure

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

The opportunity to participate in the transit planning and decision making processes; and, The right to fair decisions on the location of transit services, facilities and passenger amenities.

The complaint will be made in writing to the City of Monrovia will include all information relevant to a determination of discrimination. A complaint must be filed within six (6) months after the alleged discrimination. In cases where the complainant is unable or incapable of providing a written statement, a City of Monrovia designee will, if necessary, assist the person in converting verbal complaints to writing and will interview the complainant. The complainant or his/her representative will sign all complaints.

The following two (2) documents are the complaint forms – in English, Spanish, and Chinese.



	d. Sex	e. Age 🔲 f. Di	isability			
	g. Religion 🗌	h. Medical Condition		i. Marital Statu	ıs 🗌	
	j. Sexual Orientation					
7.	What date did the alleged discrimination take place?					
8.	In your own words, describe the alleged discrimination. Explain what happened and whom you believe was responsible. Please use the back of this form if additional space is required.					
_						
_						
9.	Have you filed this complaint with any other federal, state, or local agency; or with any federal or state court? Yes: \square No: \square					
	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 flied. $ \\$					
	Name:					
	Address:					
	City:					
11.	Please sign below. You may attach any written materials or other information that you think is relevant to your complaint.					
			-	Date		

After review of the complaint, which will include, but not be limited to, interviewing all appropriate City personnel, the complainant, witnesses, and review of City's policies and service standards, the City of Monrovia will make a determination of discrimination. If it is found that discrimination did not occur, the complainant will be notified in writing and the procedure will be terminated. Notification will occur within reasonable time of the original submission of the complaint. At that time the complainant will be advised of their right to challenge the decision of the City of Monrovia by submitting a written request for a hearing within five (5) days of the receipt of the determination.

If after the City of Monrovia's review of the complaint, it is found that discrimination may have occurred, a formal hearing will be held. The complainant will be notified of this determination within reasonable time of the submission of the complaint. The hearing will occur on an available and mutually agreed upon date among both parties and will be attended by the City of Monrovia, the complainant and the appropriate personnel. Following the hearing, the City of Monrovia will make a final determination. The complainant will be notified of this determination in writing within ten (10) business days of the hearing. If justified, appropriate remedial action will be taken. The Administrator's decision will be considered final at the City level.

If the Administrator finds that discrimination did not occur, the complainant will be notified of that disposition and will advise the complainant of their right to submit their complaint to the Federal Transit Administration for further investigation.

Complaint forms are available in English, Spanish, and Chinese on the City of Monrovia's website. The forms are also available at the City of Monrovia City Manager's office upon request. The general complaint procedure is available on the City's website, in English, Spanish, and Chinese. The detailed complaint procedure noted above will be made available to members of the public upon request. Provision will be made for persons with limited English proficiency.

3. Recording Title VI Investigations, Complaints, and Lawsuits

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

- The date the investigation, lawsuit, or complaint was filed;
- A summary of the allegation(s);
- The status of the investigation, lawsuit, or complaint; and
- Actions taken by the City or subcontractor in response to the investigation, lawsuit, or complaint

To date, the City of Monrovia has no transit related Title VI complaints.

4. Council's Resolution Approving Title VI Program

The Title VI Plan was presented to the Monrovia City Council for their approval at the December 17, 2019 City of Monrovia Council Meeting, this Title VI Plan update was approved by Resolution No 2019-73.

5. Provision of Additional Information to the FTA

The City of Monrovia will provide the Federal Transit Administration (FTA) additional information upon request. Such information may be related to, but not limited to, investigation of complaints of discrimination or to resolve concerns about possible noncompliance with Title VI.

In addition, the City of Monrovia will submit an updated Title VI Plan to METRO, as the pass through agency for FTA for Section 5309 and anticipated award of Section 5310 funds, once every three (3) years and will include proof of submittals.

III. Public Participation Plan

Monrovia has been committed to encouraging public participation related to the Station Square Public Improvement Plan, as community support is critical to the success of the project. The City has obtained Section 5309 Federal assistance for the construction and installation of passenger amenities and improvements for the existing Foothill Transit Station and the Metro Gold Line Station. These amenities and improvements enhance Station Square Transit Village and the overall Station Square Public Improvement Plan. In addition, the City is anticipating the award of Section 5310 Federal funds which will be used to enhance mobility of seniors and individuals with disabilities, increase service destinations for educational and medical purposes, and extend hours to accommodate a 24-hour daily on demand service to meet the current needs with our Monrovia Transit transportation system and Lyft program.

All Monrovian residents that use and benefit from the existing bus services and stops to Monrovia Transit Village through the Station Square project were encouraged to participate in developing the Station Square Public Improvement Plan. The City of Monrovia solicited input from residents during significant phases of the project and provided regular updates to the community and City Council as the Plan moved through design and implementation process. As Section 5310 Federal funds are received, the City of Monrovia will reach out for public participation and feedback.

Monrovia's public participation planning ensures that:

- Residents with concerns or interests have an appropriate opportunity to participate in decisions about specific plans and are notified of these opportunities to provide input.
- Community involvement and contribution are included in the development of specific plans in regards to passenger amenities.
- Concerns of all persons or groups participating in the process, users of existing Foothill Transit and Metro bus services, and future Metro Gold Line users will be considered in the development of specific plans and location of transit services and amenities.
- Residents with concerns regarding transportation fares, installation of new rules, changes in the program are encouraged to express their opinion so that it may be taken into consideration.
- Monrovia will solicit the involvement of those potentially impacted from all public transportation systems.
- Monrovia residents are welcome to share their thoughts at Council Meetings during Public Comment.

1. Opportunities for Public Participation

Numerous outreach methods are used to keep residents informed and gather community input of project improvements and alterations such as City Council meetings, community meetings, social media, and/or public information meetings.

COMMUNITY MEETINGS

Community meetings are scheduled at critical points during projects to allow for targeted community input. Community meeting are scheduled to allow the best opportunity for attendance by the general public, and times most convenient to the general public. All community meetings include a presentation/updates and question and answer session to ensure that participants are equally informed. Notifications are provided regarding the availability of language assistance (reference Language Assistance Plan). The following is considered in establishing the locations and scheduling times for community meetings:

- Convenience and accessibility for minorities, persons with disabilities, and LEP communities by hosting meetings in areas of the City that are accessible by public transit;
- Meetings scheduled at various times of the day/week to allow for residents to attend and participate, despite work and family obligations;
- Size of the venue and format of the meeting to allow for meaningful dialogue;
- Engaging meeting materials to facilitate participation.

MARKETING MATERIALS

Marketing materials notifying the public of community meetings, project updates, and available Foothill Transit and Metro passenger amenities are broadly advertised. Methods include:

- Handouts distributed to key destinations in Monrovia (English, Spanish, Chinese) including the Community Center, City Hall, and Monrovia Public Library;
- Flyers mailed to nearby residents;
- City's webpage www.CityofMonrovia.org contains translation (English, Spanish, Chinese);
- Social media conduits;
- Distribution of marketing materials to special interest and community groups, such as the Monrovia Area Partnership;
- Notification of available translation services for persons with limited English proficiencies for meetings

Below are examples of handouts available in English, Spanish, and Chinese:







2. Public Involvement Process

Measures were taken to overcome linguistic, institutional, cultural, economic, or other barriers that may prevent minority and low income people and populations, persons with disabilities and persons with Limited English Proficiency (LEP) from effectively participating in our public programs. By making a reasonable effort to include these populations, Monrovia ensured that the interests and input of all residents were given equal consideration, and that the needs of LEP populations were addressed.

The City of Monrovia Title VI Plan provides a Language Assistance Plan to encourage participation of LEP individuals in respective planning processes, and notify LEP persons of opportunities to provide input.

3. Next Steps

A complete record of public comments and input that are received from community meetings during the development phase are presented to City Council. The development of Station Square Transit Village public comment presented at City Council meetings can be accessed and downloaded at http://www.cityofmonrovia.org/communitydevelopment/page/station-square-transit-village. City staff provided regular updates to the Council throughout the design process. Input gathered during the outreach process was used by City staff and the Station Square Project Team in developing a preferred design concept for Station Square, which was presented to Council for consideration, approval, and implementation.

IV. Language Assistance Plan

The Language Assistance Plan is one component of Monrovia's efforts to provide an appropriate mix of language assistance measures so all residents, including individuals that are "limited English proficient", can equally contribute and provide feedback. English proficient (LEP) individuals are those who do not Page 10

speak English as their primary language, and have limited availability to read, write, or understand English.

This Plan will outline how to identify any resident who may need language assistance, ways in which assistance may be provided, and how to notify LEP persons that assistance is available. Efforts to effectively engage LEP individuals will ensure that interests and input of all residents is given equal consideration in the development of the Station Square Public Improvement Plan.

BACKGROUND

Title VI of the Civil Rights Act of 1964 provides 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 otherwise subjected to discrimination under any program or activity that receives federal financial assistance. Title VI regulations have been interpreted to hold that Title VI prohibits conduct that has disproportionate effect on LEP persons because such conduct constitutes a form of national origin discrimination.

Monrovia's Language Assistance Plan has been prepared to address the City's responsibilities as a recipient of Federal assistance for Section 5309 and 5310. The City will use these federal funds for the construction and installation of passenger amenities, improvements to the Monrovia Transit Village and transportation, construction of bus stop shelters with benches, trash cans, lighting, and information kiosks. Some funds will be used to restructure the existing stops to improve bus movement in and out of stops; the stops are currently used by Monrovia Transit and Foothill Transit. Funding will also be used to enhance mobility of seniors and individuals with disabilities and increase service destinations for.

As a first step to engage LEP individuals in planning efforts, the City of Monrovia 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 programs, activities, or services.
- 2. The frequency with which LEP person come in contact with these programs, activities, and services.
- 3. The nature and importance of programs, activities, and services provided to the LEP population.
- 4. Resources available to the City of Monrovia and overall cost to provide LEP assistance.

A summary of the results of the four-factor analysis is in the following section.

1. Four Factor Analysis

1. The number or proportion of LEP persons in the service area who may be served or are likely to encounter passenger amenities and improvements at Station Square.

The City of Monrovia utilizes Section 5309 & 5310 Federal assistance for the construction and installation of passenger amenities and improvements to serve existing Foothill Transit bus, Metro Gold Line Station, Lyft and Monrovia Transit services. All Monrovia residents that currently use existing transportation services or plan to use Metro Gold Line will likely encounter these amenities and improvements. As such, the number or proportion of LEP served or encountered as part of the project is based on Monrovia's total population of 36,622 residents.

The City of Monrovia assessed the following information about LEP persons to determine the number or proportion of LEP persons who might use the passenger amenities and improvements at Station Square based on the 2010 U.S. Census data. The City of Monrovia determined that out of a population of 36,622 residents that may be served or likely to encounter the passenger amenities and improvements, funded through Section 5309, 12,521 (34.19%) residents speak a language other than English; 5,104 residents (13.94%) have limited English proficiency, meaning that they speak English less than "very well". Of those persons with limited English proficiency, the majority speaks Spanish (3,507 residents or 9.57%) and 1,364 residents (3.72%) speak Asian and Pacific Islander languages.

Population	Monrovia Residents	Percentage		
City of Monrovia	36,622	100%		
Language other than English	12,521	34.19%		
LEP Individuals	5,104	13.94%		
LEP Spanish Speakers	3,507	9.57%		
LEP Asian or Pacific Islander	1,364	3.72%		
Language Speakers (Chinese/Mandarin)				

2. The frequency in which LEP come in contact with passenger amenities and improvements at Station Square.

The frequency in which LEP come in contact with the passenger amenities and improvements is determined by Monrovia's existing LEP population of 5,104 residents, and LEP ridership and usage of the bus routes, stops at Station Square Transit Village, and the frequency of all transportation services.

There is currently one fixed route bus lines that serve the Station Square area. Foothill Transit 270 is a local service that runs on Myrtle Avenue, east of Station Square and serves the Monrovia Transit Village. Line 270 serves Monrovia, Irwindale, and El Monte. Destinations include Old Town Monrovia, Station Square, Peck Road Park, Norwood Library, and the Rio Hondo Bike Path. This route is in service on weekdays and Saturday.

LEP populations using existing transportation services will be determined as ridership of LEP persons may increase as a result of added amenities and overall improvements to the variety of programs and services.

The City of Monrovia will provide information on its public transit system in English, Spanish, and Chinese to serve existing LEP individuals and future LEP users that may be unfamiliar with various services such as transit routes, timetables, and Lyft Concierge Dispatch Service. Monrovia will continue to determine those populations with LEP and continue to address the needs to LEP persons in the future.

3. The nature and importance of programs, activities, and services provided through transportation services to the LEP population.

Passenger amenities and improvements with Monrovia's transportation system are part of a greater infrastructure effort for Monrovia and the Metro Gold Line station area. One of the largest public works projects in City history was the Station Square Public Improvement Plan which utilized Section 5309

Federal assistance, state grants, Gold Line Foothill Extension Construction Authority and Los Angeles Metropolitan Transportation Authority (METRO) money to improve areas that will benefit the community and LEP populations. Anticipated Section 5310 Federal funding will assist in 24/7 hours of operation and full on-demand system that enhance transportation for all residents including LEP and ADA passengers.

The Gold Line Station serves as the entryway to Station Square, and includes a transit plaza that serves the transportation aspects of the station and existing transit service such as bus shelters, kiosks with information in Spanish and Chinese, etc; it provides new amenities to enhance the user experience and improves safety. Passengers of all ages and existing LEP individuals that use Foothill Transit and Metro bus services and stops will benefit from the improved infrastructure and added amenities to Station Square.

4. Resources available to the City of Monrovia and overall cost to provide LEP assistance.

Financial resources available within the current budget for marketing to or communicating with LEP persons in their language are minimal. However through Section 5309 and anticipated Section 5310 Federal funding, the City of Monrovia has actively engaged LEP populations in the planning process.

Spanish and Chinese speaking residents have a significant presence in Monrovia. These LEP populations were notified of opportunities of public transportation, in a format easily understood by the identified populations. These formats have included flyers in English, Spanish, and Chinese, at key destinations in Monrovia; information on the City's webpage www.CityofMonrovia.org/communitydevelopment in English, Spanish, and Chinese; notification will be provided to LEP persons for available translation services at meetings.

2. Language Assistance Measures

Language measures currently used or planned to be used by the City of Monrovia to address the needs of LEP persons include the following:

- Vital documents including the Civil Rights Notice, Title VI Complaint Form, and Title VI Complaint Procedures translated into the identified LEP languages
- Translating marketing materials into Spanish and Chinese
- If needed, arranging for availability of oral translators depending on availability
- Interactive meeting materials to engage LEP individuals in the planning process
- Posting notices in appropriate languages informing LEP persons of available transit services, routes, and amenities; and during the Station Square planning process, opportunities for LEP persons to provide input

Monrovia will continue to seek ways to add notices to the City website to inform LEP populations of opportunities for input and project construction

3. Staff Training

To ensure effective implementation of this plan, the City of Monrovia will schedule training at orientations for new City staff and relevant employees on an annual basis to review:

- Monrovia's Language Assistance Plan
- Demographic data about the local LEP populations
- Printed LEP persons' materials

4. Notice to LEP Persons about Available Language Assistance

The City of Monrovia is working toward being able to notify LEP persons in their own language about the language assistance available to them without cost by using the following methods:

- Webpage notices
- Information at local events, City Hall, Community Center, and Monrovia Public Library
- Flyers and brochures
- Sending information to local organizations, such as Community Strategic Neighborhood Team (CNST), and local community faith based organizations that work with LEP persons.

5. Monitoring, Evaluating, and Updating Plan

The Language Assistance Plan will have monitoring activities with transportation services such Metro Gold Line, Lyft, and Monrovia Transit services. These monitoring activities may identify changes that should be made to the Language Assistance Plan. Monitoring activities will include evaluation of the following information:

- Needs identified by the community or LEP populations during outreach activities
- New data related to LEP populations and Metro Gold Line ridership numbers
- Assessing the sufficiency of staff training and budget for language assistance

Determination of Site or Location of Facilities

None of our FTA funded construction projects required land acquisition and the displacement of persons from their residences and businesses; therefore we did not need to conduct a Title VI equity analysis.

Minority Representation on Planning and Advisory Bodies

Monrovia does not have a transit related planning advisory board.

V. Board Adoption of Policy