This document was prepared by FACT to comply with Title VI of the Civil Rights Act of 1964, including new provisions detailed in U.S. Department of Transportation’s FTA Circular 4702.1B, “Title VI Requirement and Guidelines for Federal Transit Administration Recipients.”
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FULL ACCESS AND COORDINATED TRANSPORTATION (FACT) is subject to Federal Transit Administration (FTA) Title VI requirements in accordance with 49 CFR, part 21 as a subrecipient of federal grants. Title VI “prohibits recipients and subrecipients of Federal financial assistance (e.g., States, local governments, transit providers) from discriminating on the basis of race, color, or national origin in their programs or activities, and it obligates Federal funding agencies to enforce compliance.” Title VI also states that:

“Subrecipients shall submit Title VI Programs to the primary recipient from whom they receive funding, in order to assist the primary recipient in its compliance efforts, on a schedule to be determined by the primary recipient.”

FACT is subject to comply with the General Requirements of the FTA Title VI program, as follows:

1. "Title VI Notice to the Public, including a list of locations where the notice is posted
2. Title VI Complaint Procedures (i.e., instructions to the public regarding how to file a Title VI discrimination complaint)
3. Title VI Complaint Form
4. List of transit-related Title VI investigations, complaints, and lawsuits
5. Public Participation Plan, including information about outreach methods to engage minority and limited English proficient populations (LEP), as well as a summary of outreach efforts made since the last Title VI Program submission
6. Language Assistance Plan for providing language assistance to persons with limited English proficiency (LEP), based on the DOT LEP Guidance
7. A table depicting the membership of non-elected committees and councils, the membership of which is selected by the recipient, broken down by race, and a description of the process the agency uses to encourage the participation of minorities on such committees
8. A copy of board meeting minutes, resolution, or other appropriate documentation showing the board of directors or appropriate governing entity or official(s) responsible for policy decisions reviewed and approved the Title VI Program. For State DOT’s, the appropriate governing entity is the State’s Secretary of Transportation or equivalent. The approval must occur prior to submission to FTA.
9. Additional information as specified in chapters IV, V, and VI, depending on whether the recipient is a transit provider, a State, or a planning entity.”

FACT is not a public transit provider, a State or a planning entity as detailed in the regulations; therefore, some of the Title VI General Requirements are not applicable. Title VI regulations specifically state that:

“Subrecipients may choose to adopt the primary recipient’s notice to beneficiaries, complaint procedures and complaint form, public participation plan, and language assistance plan where appropriate.”

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1 www.fta.dot.gov/documents/FTA_Title_VI_FINAL.doc
2 Ibid.
3 www.fta.dot.gov/documents/FTA_Title_VI_FINAL.doc
Recognizing that both FACT and SANDAG both provide planning and/or services throughout the countywide service area, it is logical for FACT to utilize SANDAG’s Limited English Proficiency (LEP) Plan – Factor 1 demographic analysis as an element of preparing its Language Assistance Plan (LAP) plan.

TITLE VI PLAN ELEMENTS

FACT’s Title VI Notice to the Public, Title VI Complaint Procedures, Title VI Complaint Form are posted on the FACT website at http://www.factsd.org/non-discrimination-policy/. These documents are available in English and Spanish, but also may be translated in other languages upon request.

Title VI Notice to the Public

FACT’s Title VI Notice to the Public is included in this plan as Attachment A. A list of locations where the notice is posted is included as Attachment B.

Title VI Complaint Procedures

FACT’s Title VI Complaint Procedures are included in this plan as Attachment C.

Title VI Complaint Form

FACT’s Title VI Complaint Form is included as Attachment D to this plan.

Transportation Related Title VI Investigations, Complaints, and Lawsuits

FACT received one (1) Title VI compliant in June 2014. FACT’s Title VI complaints procedure was followed and based on the complaint investigation process, it was determined that there was no finding or evidence of discrimination based on race, color, or national origin. FACT has had no Title VI lawsuits.

Public Participation Plan

FACT Mobility Coordinators identify customers as LEP by telephone during the transportation scheduling and referral process. LEP customer information is logged in and compiled by FACT staff.

Summary of Outreach Efforts Made

FACT promotes its services through the:

- RideFACT postcard - translated in English and Spanish (Attachment E),
- RideFACT Riders Guide – translated in English and Spanish (Attachment F),
- FACT website – FACT posts notices and announcements;

Additional outreach is conducted through participation in variety of different public meeting platforms open to the public including but not limited to:

- **Council on Access & Mobility (CAM)** – CAM meetings are held every other month or as needed, altering between a north and south county location or via phone as needed. FACT encourages transportation stakeholders and the public to participate in meetings regularly. CAM reviews regional services, grant funding requirements, coordination, and other topics related to transportation.
- **Social Services Transportation Advisory Council (SSTAC)** – SSTAC meetings are held every other month at SANDAG. Meagan Schmidt, FACT’s Operation Manager is currently the Chair of SSTAC. FACT provides service updates and discusses important issues related to specialized transportation services.
- **FACT Board Meetings** – FACT Board Meetings are held once a month. FACT’s Title VI plan is reviewed and approved at Board meetings. The agenda is made available to the public on FACT’s website and meetings include a public comment section. FACT invites guests and riders regularly to provide information and feedback regarding FACT’s services.
As service-related issues emerge in the future that warrant additional outreach to stakeholders and/or members of the public, FACT will ensure that:

- Meetings will be scheduled to ensure that locations, dates and times are acceptable to the greatest number of LEP stakeholders, encouraging the maximum participation from the target audiences;
- Written materials are made available in other languages and formats;
- Meeting venues are within close proximity to public transit are fully accessible to persons with disabilities (e.g., accessible elevators, wheelchair ramps, wide door widths); and
- Staff is available before and after meetings to respond to stakeholder inquiries.

**Outreach Plan to Engage Minority and LEP Populations**

Should additional direct outreach to the public become necessary, FACT will make efforts to conduct outreach opportunities to further engage minority and LEP populations. Some methods and strategies to engage minority and LEP stakeholders will include, but not be limited to:

- Presentations to organizations on how the LEP persons can access FACT to access transportation options in the communities served by FACT;
- Distribution of literature and information on the website in the appropriate language about how clients can access FACT;
- Notices and invitations to community meetings and roundtable discussions sent out to the public and community-based organizations which are available in English, Spanish and other identified languages;
- Legal ads in newspapers, as applicable;
- Notices on the FACT website in English, Spanish and other identified languages needed;
- Distribution of notices to agency/organization staff representatives and community advocates for various special interest groups;
- Meetings when appropriate and at convenient and accessible locations for different populations; and
- Translation services at meetings as needed to translate for persons with limited English proficiency.

All comments received from meetings will be documented and reported to the Council on Access and Mobility (CAM) and FACT Board of Directors for their information and/or action.

**LANGUAGE ASSISTANCE PLAN**

**Purpose**

“LEP” is an acronym for “limited English proficiency/proficient”. The U.S. DOT describes limited English proficiency as having a limited ability to read, write, speak, or understand English. The U.S. DOT and FTA (in both the LEP guidance and Title VI circulars), define this population as people who reported that they speak English “not well” or “not at all.”

There are several relevant laws concerning language access for LEP individuals. Federal laws particularly applicable to language access include: (1) Title VI of the Civil Rights Act of 1964, and the Title VI regulations, prohibiting discrimination based on race, color, or national origin, and (2) Executive Order 13166, which states that LEP individuals should have meaningful access to federally funded programs and activities. Additional provisions requiring language services for LEP individuals are derived from the San Diego Association of Governments (SANDAG) Language Assistance Plan.

FACT’s Language Assistance Plan provides an overview of requirements, policies, and practices for FACT to provide effective, equitable, and respectfully transportation/mobility services. As a subrecipient of federal funds, FACT is required to take reasonable steps to ensure LEP individuals have meaningful access to FACT services. This includes conducting a four (4) factors analysis:
1) The number or proportion of LEP persons eligible to be served or likely to be encountered by FACT programs, services, and activities.

2) The frequency with which LEP individuals come in contact with FACT programs, services, and activities.

3) The nature and importance of the program, activity, or service provided by the program to people’s lives; and

4) The resources available to FACT and costs.

The intent of this Plan is to find a balance that ensures meaningful access to critical services to LEP persons without imposing an undue burden.

FACT’s Language Assistance Plan incorporates all reasonable steps to ensure meaningful access to FACT’s services for LEP individuals. Limited English Proficient (LEP) persons refer to:

“Persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. It includes people who reported to the U.S. Census that they speak English less than well, not well, or not at all.”

Four Factor Analysis

Title VI of the 1964 Civil Rights Act prohibits recipients of Federal funding from discriminating on the basis of national origin, including limited LEP individuals, defined as those who have a limited ability to read, write, speak, or understand English. Executive Order 13166, “Improving Access to Services for Persons with Limited English Proficiency” (LEP) (2000). FACT is not a direct recipient of federal funds; however, this Title VI requirement has recently been interpreted to include subrecipients of federal grants and their funded programs.

FACT’s service area includes all of San Diego County; therefore, the scope of the FACT’s Language Assistance Plan (LAP) must be applicable to LEP populations countywide. FACT’s LAP Plan will therefore incorporate the Factor 1 analysis conducted by SANDAG in December 2019. Incorporating the demographic element of SANDAG’s plan will ensure that FACT maintains consistency with the regional LEP analysis findings, avoids duplication of effort and cost-effectively addresses Title VI LEP requirements. Modifications of SANDAG’s Factor 1 analysis have been modified as necessary to be applicable to FACT. The details of each of the four factors are summarized below.

Factor 1: The Number or Proportion of LEP Persons Eligible to Be Served or Likely to Be Encountered by the Services Provided by FACT

The Factor 1 analysis includes an assessment of the number or proportion of LEP persons in San Diego County and is summarized for Section I of this report. Based on the examples included in the federal guidance, SANDAG defines LEP persons as those individuals who speak English less than well (either “not well” or “not at all”).

There were several key findings:

- More than 774,362 persons, or 23.58% of the San Diego region, are foreign born;
- 37.68% of persons in San Diego County speak a language other than English at home, 14.63% of the county’s population speak English less than “very well” (includes those that speak English “well”, “not well,” and “not at all”);
- 7.28% are considered LEP as they speak English less than “well” (includes those that speak English “not well” and “not at all”);
- Of the languages spoken in the region, 15 are spoken by more than 1,000 LEP persons;
- Spanish is the second most predominant language, other than English, spoken in the region; and
Spanish is the most predominant language spoken by English learners in San Diego County public schools.

Table 1
Limited English Proficient Speakers by Language in San Diego County

<table>
<thead>
<tr>
<th>Language*</th>
<th>LEP Population</th>
<th>Percent of All LEP Speakers</th>
<th>Percent of Total Population (Age Five and Older)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Spanish</td>
<td>161,608</td>
<td>71.98%</td>
<td>5.26%</td>
</tr>
<tr>
<td>Vietnamese</td>
<td>14,301</td>
<td>6.37%</td>
<td>0.47%</td>
</tr>
<tr>
<td>Tagalog</td>
<td>7,515</td>
<td>3.35%</td>
<td>0.25%</td>
</tr>
<tr>
<td>Chinese</td>
<td>6,298</td>
<td>2.81%</td>
<td>0.21%</td>
</tr>
<tr>
<td>Arabic</td>
<td>5,389</td>
<td>2.40%</td>
<td>0.18%</td>
</tr>
<tr>
<td>Korean</td>
<td>3,858</td>
<td>1.72%</td>
<td>0.13%</td>
</tr>
<tr>
<td>Russian</td>
<td>2,148</td>
<td>0.96%</td>
<td>0.07%</td>
</tr>
<tr>
<td>Mandarin</td>
<td>2,050</td>
<td>0.91%</td>
<td>0.07%</td>
</tr>
<tr>
<td>Filipino</td>
<td>2,037</td>
<td>0.91%</td>
<td>0.07%</td>
</tr>
<tr>
<td>Chaldean Neo-</td>
<td>1,989</td>
<td>0.89%</td>
<td>0.07%</td>
</tr>
<tr>
<td>Aramaic</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Farsi</td>
<td>1,914</td>
<td>0.85%</td>
<td>0.06%</td>
</tr>
<tr>
<td>Lao</td>
<td>1,678</td>
<td>0.75%</td>
<td>0.06%</td>
</tr>
<tr>
<td>Assyrian Neo-Aramaic</td>
<td>1,605</td>
<td>0.72%</td>
<td>0.05%</td>
</tr>
</tbody>
</table>

Source: 2013-2017 ACS 5-year Public Use Microdata Sample (PUMS)
*Restricted to languages spoken by at least 1,000 limited English speakers.

LEP POPULATION SOURCES

Unlike the evaluation of a specifically defined geographical area that can cross jurisdictional boundaries, such as a transit district, the SANDAG LEP analysis includes all of San Diego County and its service area.

Based on U.S. DOT guidance, SANDAG evaluated the following federal, state, and local data sources:

- U.S. Census, 2013-2017 American Community Survey (ACS) 5-Year Public Use Microdata Sample
(PUMS). Please note: the U.S. Census Bureau discontinued the ACS 3-Year PUMS data used in the 2015 LAP report, therefore, 5-Year Estimates data are used for the 2019 report.

- County of San Diego Department of Behavioral Health Interpretation Services, Interpreter Services Report, Fiscal Year 2017-2018.

**LEP POPULATION ANALYSIS**

**ACS 2013-2017**

The U.S. DOT describes LEP as having a limited ability to read, write, speak, or understand English. The U.S. DOT and FTA define this population as people who reported that they speak English “not well” or “not at all.” Table 2 shows this analysis for San Diego County. The table shows that the overall LEP population in the county is 7.28% of persons age five and older.
Table 2

English Proficiency for San Diego County

<table>
<thead>
<tr>
<th>County</th>
<th>Total Population Age 5 and Older</th>
<th>Speaks English Only</th>
<th>Speaks English “Well” or “Very Well”</th>
<th>Less Than “Well”</th>
<th>Percentage Less than “Well”</th>
</tr>
</thead>
<tbody>
<tr>
<td>San Diego</td>
<td>3,070,763</td>
<td>1,913,789</td>
<td>933,518</td>
<td>223,456</td>
<td>7.28%</td>
</tr>
</tbody>
</table>

Source: 2013-2017 ACS 5-Year Estimates, Table B16004

The data shown in Table 2 also is available for four language types: Spanish, Indo-European, Asian or Pacific Islander, and Other Languages. This analysis is shown in Table 3, which revealed that the Spanish LEP percentage is the highest at 5.21% of the total San Diego County population.

Table 3

English Proficiency by Language Category in San Diego County

<table>
<thead>
<tr>
<th>English Proficiency</th>
<th>Spanish</th>
<th>Indo-European</th>
<th>Asian or Pacific Islander</th>
<th>Other Languages</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Population</td>
<td>% Total Population</td>
<td>Population</td>
<td>% Total Population</td>
</tr>
<tr>
<td>Speak English “Very Well”</td>
<td>472,367</td>
<td>15.38%</td>
<td>71,203</td>
<td>2.32%</td>
</tr>
<tr>
<td>Speak English “Well”</td>
<td>128,324</td>
<td>4.18%</td>
<td>17,518</td>
<td>0.57%</td>
</tr>
</tbody>
</table>

Limited English Proficient

<table>
<thead>
<tr>
<th></th>
<th>Population</th>
<th>% Total Population</th>
<th>Population</th>
<th>% Total Population</th>
<th>Population</th>
<th>% Total Population</th>
<th>Population</th>
<th>% Total Population</th>
</tr>
</thead>
<tbody>
<tr>
<td>Speak English “Not Well”</td>
<td>108,044</td>
<td>3.52%</td>
<td>7,565</td>
<td>0.25%</td>
<td>34,829</td>
<td>1.13%</td>
<td>8,056</td>
<td>0.26%</td>
</tr>
<tr>
<td>Speak English “Not at All” LEP Subtotal</td>
<td>51,997</td>
<td>1.69%</td>
<td>2,141</td>
<td>0.07%</td>
<td>7,682</td>
<td>0.25%</td>
<td>3,142</td>
<td>0.10%</td>
</tr>
<tr>
<td>Total</td>
<td>160,041</td>
<td>5.21%</td>
<td>9,706</td>
<td>0.32%</td>
<td>42,511</td>
<td>1.38%</td>
<td>11,198</td>
<td>0.36%</td>
</tr>
</tbody>
</table>

Total | 760,732 | 24.77% | 98,427 | 3.21% | 245,966 | 8.01% | 51,849 | 1.69% |

Source: 2013-2017 ACS 5-Year Estimates, Table B16004
The ACS data includes information about languages spoken by 42 different language groups\(^3\) (but not by ability to speak English per the U.S. DOT guidance definition as previously mentioned). Table 4 shows the five most prevalent non-English languages spoken at home in the San Diego region. This data was collected from 2013 through 2017 among the total population ages five and older, including both LEP and non-LEP populations. While there were respondents from all 42 language groups, Spanish, Tagalog, Chinese, Vietnamese, and Arabic were the primary languages. Compared to the 2015 analysis, these figures reveal that the number of households speaking Spanish, Tagalog, Chinese, and Arabic have increased while the number of households speaking Vietnamese have decreased.

**Table 4**

<table>
<thead>
<tr>
<th>Language</th>
<th>Language Spoken at Home for the Population Age Five and Older</th>
<th>Percent of Total Population</th>
</tr>
</thead>
<tbody>
<tr>
<td>Spanish</td>
<td>760,732</td>
<td>24.77%</td>
</tr>
<tr>
<td>Tagalog (incl. Filipino)</td>
<td>95,001</td>
<td>3.09%</td>
</tr>
<tr>
<td>Chinese (incl. Mandarin, Cantonese)</td>
<td>47,112</td>
<td>1.53%</td>
</tr>
<tr>
<td>Vietnamese</td>
<td>41,489</td>
<td>1.35%</td>
</tr>
<tr>
<td>Arabic</td>
<td>25,359</td>
<td>0.83%</td>
</tr>
<tr>
<td>All Other Languages</td>
<td>187,281</td>
<td>6.10%</td>
</tr>
</tbody>
</table>

*Source: 2013-2017 ACS 5-Year Estimates, Table C16001*

Figure 1 displays the geographic concentrations of LEP persons in the county using 2013-2017 ACS 5-Year data at the tract level. Areas shaded in orange are where greater than 14.63% (the SANDAG service area average) of the population speaks English less than “very well.” The less than “very well” distinction considers bilingual speakers who may speak English well but prefer to use their native language.

Figure 2 shows the presence of all LEP persons in the county using 2013-2017 ACS 5-Year PUMS data and illustrates where the proportion of the population speaking English less than “well” for all languages is greater than 7.31%, the service area average.

Figure 3 shows the Census tracts where the proportion of LEP Spanish speakers who speak English less than “very well” is greater than 9.39%, the service area average, using 2013-2017 ACS 5-Year data at the tract level.

Figure 4 shows the Public Use Microsample Areas where the proportion of LEP Spanish speakers who speak English less than “well” is greater than 5.26%, the service area average, using 2013-2017 ACS 5-Year PUMS data.

These findings are comparable to the findings in the 2015 Factor 1 analysis. As with the previous analysis, the proportion of Spanish speakers is far greater than any other language in San Diego County.

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\(^3\) Source: U.S. Census Bureau, Social, Economic, and Housing Statistics Division Working Paper Number 2018-31
Figure 1
All Languages Limited English Proficient Census Tracts

Limited English Proficient (LEP) Census Tracts

All Languages Speak English Less Than "Very Well"
- At or Below County Average
- Above County Average

The county average for the population five years and older that speaks English less than "Very Well" is 14.83%.

Source: 2013-2017 ACS 5-Year Estimates, Table C16001
Figure 2
All Languages Limited English Proficient Public Use Microsample Areas

Source: 2013-2017 ACS 5-Year PUMS
Figure 3
Spanish Limited English Proficient Census Tracts

Source: 2013-2017 ACS 5-Year Estimates, Table C16001
Figure 4
Spanish Limited English Proficient Public Use Microsample Areas

Source: 2013-2017 ACS 5-Year PUMS
California Department of Education English Learner Data

This report also analyzed CDE English learner data. In particular, the CDE data was used to determine the existence of other prevalent languages that may have fallen under vaguer Census categories, such as “Other and Unspecified Languages”. Table 5 shows the top ten languages other than English and the number of students who identify as speaking those languages at home, along with the associated percentages.

Table 5
English Learner Data for San Diego County Public Schools

<table>
<thead>
<tr>
<th>Language</th>
<th>English Learners by Language</th>
<th>Percent of English Learners</th>
</tr>
</thead>
<tbody>
<tr>
<td>Spanish</td>
<td>81,988</td>
<td>79.43%</td>
</tr>
<tr>
<td>Arabic</td>
<td>3,417</td>
<td>3.31%</td>
</tr>
<tr>
<td>Filipino (Filipino or Tagalog)</td>
<td>2,475</td>
<td>2.40%</td>
</tr>
<tr>
<td>Vietnamese</td>
<td>2,072</td>
<td>2.01%</td>
</tr>
<tr>
<td>Other non-English languages</td>
<td>1,968</td>
<td>1.91%</td>
</tr>
<tr>
<td>Chaldean</td>
<td>1,927</td>
<td>1.87%</td>
</tr>
<tr>
<td>Mandarin (Putonghua)</td>
<td>1,138</td>
<td>1.10%</td>
</tr>
<tr>
<td>Somali</td>
<td>1,032</td>
<td>1.00%</td>
</tr>
<tr>
<td>Farsi (Persian)</td>
<td>991</td>
<td>0.96%</td>
</tr>
<tr>
<td>Korean</td>
<td>771</td>
<td>0.75%</td>
</tr>
</tbody>
</table>

Source: CDE English Learner Data for San Diego County, School Year 2017-2018

The majority share of English learners are native Spanish speakers (79.43%). This constitutes a smaller share of Spanish-speaking English learners than previously identified in the 2015 CDE analysis (81.6%). The analysis of the CDE English learner data roughly correlates to the analysis of Census LEP speakers (by languages spoken) shown in Table 1. The CDE data includes the Somali language in the list of the top ten languages for English learners.

County of San Diego Department of Behavioral Health Interpreter Services

Table 6 shows the number of translation services requested by language in fiscal year 2017-2018 from the County of San Diego Department of Behavioral Health Services.
The translation services data includes Cambodian in the list of languages, which is not identified in the top 15 languages reflected in the ACS data. Furthermore, the data includes American Sign Language, which is defined as an English language by the U.S. Census Bureau and therefore not tracked separately. A significant majority of translation requests tracked by the Department of Behavioral Health Services, 78.9%, are for Spanish. This is consistent with the ACS and CDE data.

CONCLUSION

Findings in this report reveal a presence of 15 languages in San Diego County with more than 1,000 individuals who are LEP. This analysis was based on the LEP definition included in U.S. DOT LEP guidance.

Factor 1 analysis findings indicate that more than 7% (7.28%) of the population speaks English less than well. The top five languages spoken other than English are Spanish (5.26% of the total population), Vietnamese (0.47%), Tagalog (0.25%), Chinese (0.21%), and Arabic (0.18%). Combined, these five languages cover 86.91% of the LEP population in San Diego (see Table 1). Spanish is the second most predominant language, other than English, spoken in the region.

FACT Telephone Identification of LEP Persons

FACT identifies LEP persons via the telephone using the following process:

- FACT mobility coordinators ask “What is your preferred language?” – Individuals who self-
identify as speaking English less than “very well” are offered language assistance when inquiring about transportation services. However, because self-assessment is subjective, FACT staff is aware that customers who self-identify as English speakers may find transportation encounters challenging. Customers also may require language assistance to understand unfamiliar transportation concepts and terminologies.

- During the transportation referral, if a customer inquiring about services: (1) Asks very few questions; (2) simply says “yes” in response to your questions or comments; or (3) gives inappropriate or inconsistent answers to questions, FACT staff will verify their understanding by asking them to explain back what was discussed.

- Calls from LEP customers are documented in Ecolane Transit Scheduling software.

Factor 2: The Frequency with which LEP Individuals Come in Contact with FACT Services

It should be recognized that FACT staff interaction with the public and provision of information and referral services comes only as a result of telephone calls made to FACT by the public. There is essentially no face-to-face contact made by FACT telephone staff with the public-at-large.

FACT does not have the resources to conduct large-scale or county-wide surveys. However, a client demographic survey is included on FACT’s website and is available as an online survey or print compatible document for mailing. FACT identifies customers as LEP by telephone during the transportation referral process, and has begun collection of LEP specific information in Ecolane Transit Scheduling software. On average approximately 2-3% of monthly callers are LEP (As of March 2020 1.997% Spanish, .047% Arabic, .47% Chinese, .023% Russian, and .023% Japanese)

FACT provides informational materials related to its services upon request. These materials are generally provided to those agencies, individuals, and organizations requesting information in both in English and Spanish (Attachment E).

Factor 3: The Nature and Importance of the Service Provided by FACT to People’s Lives

Individuals with LEP face a great risk for miscommunication during the referral and trip planning processes. Miscommunication between a customer and mobility coordinator may result in delayed transportation information, delayed trip requests, misunderstanding of transportation services, and lack of follow-through by the customer. Furthermore, miscommunication can reduce trust and confidence in the transportation services which may result in: lower customer satisfaction and a lack of customer’s willingness to ask questions.

The language assistance services provided by FACT for LEP customers work to bridge communications gaps encountered by LEP individuals and also serve to enhance customer satisfaction and willingness to use FACT services in the future.

FACT’s referral service provides callers and website visitor’s information regarding suitable transportation options based on their individual needs. FACT’s RideFACT service is offered to seniors and individuals with disabilities whose needs are not met by other transportation services. This process ensures that the eligible population is receiving the needed transportation to access services and social activities. LEP persons need adequate transportation to access employment, education, medical services, and social activities. Transportation is important for LEP persons to maintain their day-to-day lives.

Factor 4: The Resources Available to FACT for LEP Outreach, as well as the Costs Associated with that Outreach

Language Assistance Measures
FACT currently utilizes the following language assistance practices for LEP customers:

- **Optimal Phone Interpreters** - Telephone service line interpreter for 150 languages (provided in coordination with 2-1-1 San Diego)
- Bilingual staff - three (3) out of eight (8) full-time employees and one (1) part-time employee are bi-lingual (English/Spanish).
- Spanish-language answering machine message with prompts
- Spanish-language marketing materials
- Google Translate integration to website

As the FACT call volume continues to grow, the organization may encounter more linguistically diverse customers. With sufficient and appropriate funding support, the following language assistance could be considered to further accommodate LEP customers:

- Oral interpretation services
  - Voice-activated translation software
  - Trained on-site interpreter
- Referrals to community liaisons proficient in the preferred language of LEP persons
- Offer community trainings to refine communication skills across cultures and improve cultural competency.

**Employee Training:**
FACT employees receive training on how to communicate with LEP callers and use Optimal Phone Interpreters (OPI) for language assistance. OPI allows staff to provide timely and reasonable language assistance to LEP populations. Employees have attended trainings on understanding language and cultural barriers in addition to workshops regarding the development and management of a Title VI Program. All employees are familiar with FACT’s Title VI plan and the plan is conveniently available for reference to staff and the public. Call center staff are trained to recognize, track, and report on Title VI complaints.

**Outreach Costs**
Approximately 15-20% of FACT’s marketing budget was used to develop LEP outreach and marketing materials.

**Procedure for Written Translation Services**
Vital documents are “printed documents that provide important information necessary to participate in services, programs, or activities; and includes but is not limited to outreach materials and written notices of rights, denials, losses, or decreases in benefits or services.”

When a request for a written translation is received, a decision for translation will be based on 1) whether the document is vital based on the definition in the paragraph above; and 2) the assessment of the four factor analysis.

If the request for written translation services is acceptable, FACT will select a competent translator service in a timely manner.

**Safe Harbor Provision**
The Federal Transit Authority Circular 4702.1B states:

"DOT has adopted DOJ’s Safe Harbor Provision, which outlines circumstances that can provide a ‘safe harbor’ for recipients regarding translation of written materials for LEP populations.”
The Safe Harbor Provision stipulates that, after determining which documents are vital, written translation of vital documents should be provided for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered should be provided. Currently, Spanish is the only language to meet this threshold.

If there are fewer than 50 persons in a language group that reaches the five percent (5%) trigger in the above paragraph, written notice will be given in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost.

**LEP Data Collection and Reporting**

Data collection provides measurable evidence of FACT’s performance as it relates to providing meaningful language access to FACT services to LEP persons. LEP is a rider classification category in Ecolane Transit Scheduling software to prompt mobility coordinators to provide the appropriate assistance and for reporting LEP statistics.

**Notice to LEP Persons about the Availability of Language Assistance**

LEP persons have the right to free language assistance in their spoken language. FACT has developed a poster (Attachment G) listing two (2) languages that are likely to be spoken by LEP persons in San Diego County. The intent of the poster is for an LEP person to indicate the language they understand and contact FACT for language assistance.

The FACT office and locations of FACT public meetings may have multilingual signage posters prominently placed where LEP persons may indicate which language they understand.

**Language Assistance Plan Evaluation, Review, and Revision**

The FACT Four Factor Analysis and Language Assistance Plan, upon approval and implementation will be monitored and calendared for review every three (3) years.

The plan will be monitored using the following measures:

- Assigning a staff person to provide day-to-day administration of the Language Assistance Plan to ensure compliance and correct implementation
- Seeking feedback from LEP communities on language assistance services when possible
- Seeking staff feedback to determine the usefulness of language assistance services and the Language Assistance Plan

The following is a list of the elements to be reviewed quarterly:

- LEP caller and rider classifications in Ecolane Transit Scheduling software
- Availability of resources, including technological advances, and the costs imposed
- Assessment of the identified language needs of LEP individuals in order to determine whether interpreters and/or translated materials are needed.
- Assessment of whether staff members understand LEP policies, procedures, and how to access and carry them out.

**Membership of Non-Elected Board and Advisory Committees**

The membership of FACT Board and advisory committees is shown in Table 8.

**Table 8**

Membership of FACT Board and Advisory Committees by Race
<table>
<thead>
<tr>
<th></th>
<th>White</th>
<th>Hispanic</th>
<th>Black</th>
<th>American Indian</th>
<th>Asian/Pacific Islander</th>
<th>Other Races</th>
<th>Declined to State</th>
</tr>
</thead>
<tbody>
<tr>
<td>Board of Directors</td>
<td>59.0%</td>
<td>17.0%</td>
<td>0%</td>
<td>2.0%</td>
<td>0%</td>
<td>11.0%</td>
<td>11.0%</td>
</tr>
<tr>
<td>Council on Access &amp; Mobility (CAM)</td>
<td>60.0%</td>
<td>16.0%</td>
<td>8.0%</td>
<td>0%</td>
<td>16.0%</td>
<td>0%</td>
<td>0%</td>
</tr>
</tbody>
</table>

**Efforts to Encourage Minority Participation**
FACT understands diverse public presence and representation on advisory committees and its Board results in sound policy reflective of the entire San Diego County population. FACT’s Board Members and Executive Team regularly participate in reoccurring and ad-hoc outreach to recruit members and promote diversity on the Board and CAM. This includes recruiting participants and members from different communities throughout the County to ensure there is regional representation.

**Other Title VI Requirements**
Since FACT does not operate fixed-route transit services, the following requirements are not applicable:

- Monitoring of Sub-Recipients for Compliance with Title VI
- Title VI Equity Analysis
- Facility Construction
- Service Standards

**Board Approval of the FACT Title VI Program**
The FACT Board of Directors adopted the Title VI Plan at their regular meeting held on Thursday, May 29, 2014. The Board of Directors adopted the 2017 Title VI Plan update at their regular meeting held on July 27, 2017. The Board of Directors adopted this 2020 Title VI Plan update at their regular meeting held on May 28, 2020. The signed Board Resolution is included as attachments to this document (Attachment H).
Facilitating Access to Coordinated Transportation (FACT) operates its programs and services utilizing funds from the San Diego Association of Governments (SANDAG) and Federal Transit Administration (FTA) and therefore is required to conduct its business without regard to race, color, or national origin in accordance with Title VI of the Civil Rights Act and the Americans with Disabilities Act (ADA). Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI or the ADA may file a complaint with FACT, SANDAG or the FTA.

For more information, including the procedures to file a complaint, contact Budd Anderson at (760) 754-1252 (banderson@factsd.org), or visit the FACT office at 516 Civic Center Drive, Oceanside, CA 92054. Procedures to file a complaint are available online at http://www.factsd.org/non-discrimination-policy/.

If this information is needed in another format and/or language, please contact FACT at (760) 754-1252

Si se necesita esta información en otro formato y/o idioma, por favor llame al (760) 754-1252

Nếu thông tin này là cần thiết trong một jìnhđđâng và / hoặc ngôn ngữ, xin vui lòng liên hệ với SỰTHẬT tại(760) 754-1252

Kung ang impormasyon na ito ay kinakailangan sa isa pang format at / o mga wika, mangyaring makipag-ugnay sa katotohanan (760) 754-1252
Notificar al público de los derechos bajo el Título VI

Facilitating Access to Coordinated Transportation (FACT) por sus iniciales en Inglés, proporciona servicios y programas utilizando fondos provenientes de la San Diego Association of Governments (SANDAG) por sus iniciales en Inglés y de la Federación Administrativa de Transito (FTA) por sus iniciales en Inglés, por esta razón está obligada a proporcionar sus servicios sin distinciones de raza, color, o país de origen en concordancia con el Título VI del acta de los derechos civiles y el acta de Americanos con discapacidades (ADA) por sus iniciales en Inglés. Cualquier persona que crea que ha sido agraviada por alguna practica discriminatoria ilegal bajo el Título VI o bajo ADA puede presentar una queja a FACT, SANDAG, o en la FTA.

Para más información incluyendo los procedimientos para presentar una queja, comuníquese con Budd Anderson al (760)754-1252 (banderson@factsd.org), o visite las oficinas de FACT situadas en 516 Civic Center Drive, Oceanside, CA 92054. Los procedimientos para presentar una queja están disponibles en el internet en http://www.factsd.org/non-discrimination-policy/.

Si necesita esta información en algún otro formato o idioma por favor comuníquese con FACT al teléfono (760) 754-1252

Nếu thông tin này là cần thiết trong một jinhddảng và / hoặc ngôn ngữ, xin vui lòng liên hệ với SỰTHẬT tại(760) 754-1252

Kung ang impormasyon na ito ay kinakailangan sa isa pang format at / o mga wika, mangyaring makipag-ugnay sa katotohanan (760) 754-1252
LIST OF LOCATIONS WHERE TITLE VI NOTICE IS POSTED

1. FACT website (http://www.factsd.org/non-discrimination-policy/)
2. FACT office (516 Civic Center Drive, Oceanside, CA 92054)
3. FACT vehicles providing transportation services

Lista de lugares donde se ha publicado la notificación TÍTULO VI

1. Sitio web FACT (http://www.factsd.org/non-discrimination-policy/)
2. Oficina de FACT (516 Civic Center Drive, Oceanside, CA 92054)
3. A bordo de los vehículos que prestan servicios de transporte FACT
Title VI

FACT is committed to providing programs, services, and benefits to its customers in a non-discriminatory manner in accordance with federal, state, and local mandates which govern its funding. FACT also holds the transportation service providers in its brokerage to practice non-discrimination.

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs receiving federal financial assistance. Any person who believes that individually, or as a member of any specific class of persons, has been subjected to discrimination on the basis of race, color, or national origin as noted below may file a written complaint with FACT, 516 Civic Center Drive, Oceanside, CA 92054. Every possible effort will be made to obtain early and appropriate resolution of complaints.

Complaints Procedure

1. **Applicability.** The following complaint procedures are applicable to all persons who believe that they have been subject to discrimination by FACT related to its RideFACT service and Mobility Management activities which are funded in whole or in part by SANDAG. In general, it is designed to address disputes, including but not limited to the following:

   1.1 Disagreements regarding a requested service, accommodation, or modification of a FACT practice or requirement.

   1.2 Inaccessibility of a program, publication, or activity.

   1.3 Harassment or discrimination prohibited by California or federal law.

2. **Preliminary Review Process.** The following process must be completed prior to filing a Formal Complaint with SANDAG.

   2.1 Informal Resolution - Prior to submitting a formal complaint, the complaining party shall contact the Grants Management Analyst for assistance in resolving the matter informally as soon as is practical, generally within 15 calendar days of the time from when the subject of the complaint occurred or the complaining party became aware of FACT’s alleged non-compliance with state or federal non-discrimination laws. Complaints must be filed within 180 days of alleged incident.

   The Grants Management Analyst can be reached at 516 Civic Center Drive, Oceanside, CA 92054; 760-754-1252

   FACT will notify SANDAG of the complaint within 72 hours of receiving the complaint and record the complaint and steps taken toward resolution. FACT is responsible for informing the complaining party about FACT’s complaint procedure, including the opportunity to file a formal complaint with SANDAG and/or the Federal Transit Administration (FTA) as described below.
2.2 Report of Results to SANDAG and Complaining Party – FACT will email or mail SANDAG and the complaining party the results of the informal resolution process within 30 calendar days of receiving the complaint. If the complaining party is not satisfied with FACT’s disposition of the matter, the complaining party may file a formal complaint with SANDAG following the procedure described below.

3. **Formal Complaint.** If the procedure for Preliminary Review and informal resolution by FACT does not yield a successful resolution, then the complaining party may file a formal, written complaint with SANDAG in the manner described below. SANDAG materials can be made available in alternative languages. To make a request, call (619) 699-1900. Los materiales de SANDAG están disponibles en otros idiomas. Para hacer una solicitud, llame al (619) 699-1900

3.1 Complaints must be filed within 180 calendar days of the alleged incident of notice of the end of the Preliminary Review process described above.

3.2 Complaints must be in writing and must include an attached copy of any correspondence concerning the complaint with FACT.

3.3 Complaints must be filed with the SANDAG Title VI Compliance Officer at 401 B Street, Suite 800, San Diego, CA 92101; Fax number (619) 699-1995; TTY (619) 699-1904.

3.4 Investigation – The SANDAG Title VI Compliance Officer will initiate an investigation, which may include interviewing, consulting with, and/or requesting a written response to the issues raised in the complaint from any individual the SANDAG Title VI Compliance Officer believes to have relevant information, including the ADA Compliance Officer, FACT staff and members of the public. SANDAG may also hold an informal hearing.

3.5 Review Panel – The SANDAG Title VI Compliance Officer will convene a review panel that will consist of the Title VI Compliance Officer, the ADA Compliance Officer if applicable, a member of the SANDAG management staff, the Chief Deputy Executive Director (or designee), and (depending on the issues) other personnel as may be appropriate. This panel will review the request, investigate, and attempt to resolve the issues within 30 calendar days of receipt by SANDAG of the complaint.

3.6 Representation - The complaining party, and any party against whom the complaint is directed, have the right to have a representative.

3.7 Findings and Notification - The SANDAG Title VI Compliance Officer and/or ADA Compliance Officer will prepare and provide the complaining party, and all other parties involved, a final report containing a summary of the investigation, written findings, and a proposed disposition. This report will be provided to the complaining party and FACT within 45 calendar days of the filing of the formal complaint.

3.8 Final Disposition - The disposition proposed by the review panel will be put into effect promptly. The complaining party or any party against whom the complaint or the proposed disposition is directed may appeal. The appeal to the Executive Director (as set forth below) will not suspend the implementation of the disposition proposed by the SANDAG review panel, except in those circumstances where the SANDAG Executive Director decides that good cause exists making the suspension of implementation appropriate.

4. **Appeal**

4.1 Within 10 calendar days of the issuance of the final report, the complaining party may appeal to the SANDAG Executive Director.
4.2 An appeal is taken by filing a written request for review by the SANDAG Executive Director.

4.3 The written request for review must specify the particular substantive, and/or procedural basis for the appeal, and must be made on grounds other than general dissatisfaction with the proposed disposition. Furthermore, the appeal must be directed only to issues raised in the formal complaint as filed or to procedural errors in the conduct of the complaint procedure itself, and not to new issues.

4.4 The review by the Executive Director or his or her designee normally shall be limited to the following considerations: Were the proper facts and criteria brought to bear on the decision? Were improper or extraneous facts or criteria brought to bear on the decision that substantially affected the decision to the detriment of the complaining party? Were there any procedural irregularities that substantially affected the outcome of the matter to the detriment of the complaining party? Given proper facts, criteria, and procedure, was the decision one that a person in the position of the decision-maker might reasonably have made?

4.5 A copy of the Executive Director’s written decision will be expected within 30 calendar days of the filing of the appeal and shall be sent to all parties involved and, if appropriate, to persons whose authority will be needed to carry out the disposition. The deadline may be extended by the Executive Director for good cause. The decision of the Executive Director on the appeal will be SANDAG’s final decision.

5 File with the FTA. Any person who believes himself or herself or any specific class of persons to be subjected to discrimination prohibited by Title VI also may file a written complaint with the FTA. A complaint should be filed no later than 180 days after the date of the alleged discrimination, unless the time for filing is extended by FTA. Title VI complaints regarding federally funded programs at FACT can be sent to the applicable funding agency below:

Federal Transit Administration Office of Civil Rights
Attention: Title VI Program Coordinator
East Building, 5th Floor - TCR
1200 New Jersey Ave., SE
Washington, DC 20590
TITULO VI

FACT esta comprometido a proveer programas, servicios, y beneficios a sus clientes en una manera sin discriminaciones de acuerdo con las leyes federales, estatales y locales que el gobierno subsidia. FACT también tiene un servicio de transportación a través de subcontratos y mantiene prácticas no discriminatorias.

El título VI del código de Derechos Civiles de 1964 prohíbe la discriminación basada en raza, color, o nación de origen en programas que reciben ayuda financiera federal. Cualquier persona que individualmente, o como miembro de una clase específica de personas, ha sido sujeta a discriminación basada en raza, color, o nación de origen como se anota mas abajo puede presentar una queja por escrito con FACT, 516 Civic Center Drive, Oceanside CA 92054. Se harán todos los esfuerzos posibles para obtener una resolución de quejas pronta y apropiada.

Procedimiento para quejas

1. Aplicabilidad. Los siguientes procedimientos de reclamos son pertinentes a todas las personas que consideren que han sido sujetas a discriminación por FACT con relación a su servicio RideFACT y actividades de manejo de movilidad que son financiadas total o parcialmente por SANDAG. En general, está diseñado para tratar disputas, incluidas, entre otras, las siguientes:
   1.1 Desacuerdos en relación con un servicio solicitado, sitio, o modificación de una práctica o requisito de FACT.
   1.2 Falta de accesibilidad a un programa, publicación, o actividad.
   1.3 Acoso o discriminación prohibidos según la ley de California o la ley federal.

2. Proceso de revisión preliminar. El siguiente proceso debe completarse antes de presentar un reclamo formal ante SANDAG.

   2.1 Resolución informal: Antes de presentar un reclamo formal, la parte demandante deberá comunicarse con el analista de subsidios para obtener asistencia en la resolución del asunto de manera informal tan pronto como sea práctico, por lo general, dentro de un plazo de quince (15) días calendario a partir de la fecha en que el asunto del reclamo ocurrió o la parte demandante tuvo conocimiento de la presunta falta de cumplimiento por parte de FACT en relación con las leyes estatales o federales contra la discriminación. Las quejas deben presentarse dentro de los 180 días posteriores al supuesto incidente.

   El analista de subsidios puede ser contactado en 516 Civic Center Drive, Oceanside, CA 92054 al 760-754-1252

   FACT le notificará a SANDAG sobre el reclamo dentro de un plazo de setenta y dos (72) horas a partir de su recepción y lo registrará junto con los pasos que se tomaron para su resolución. FACT es responsable de informarle a la parte demandante sobre el procedimiento de reclamos de FACT, incluida la oportunidad para presentar un reclamo formal ante SANDAG o la Administración Federal de Transporte Público (Federal Transit Administration, FTA) de la manera que se describe a continuación.
2.2 Informe de los resultados a SANDAG y a la parte demandante: FACT le enviará a SANDAG y a la parte demandante, a través de correo electrónico o correspondencia, los resultados del proceso de resolución informal dentro de un plazo de treinta (30) días calendario a partir de la recepción del reclamo. Si la parte demandante no está satisfecha con la disposición de FACT con relación al asunto, la parte demandante podrá presentar un reclamo formal ante SANDAG según el procedimiento que se describe a continuación.

3. **Reclamo formal.** Si el procedimiento de revisión preliminar y resolución informal de FACT no produce una resolución satisfactoria, la parte demandante podrá presentar un reclamo formal por escrito ante SANDAG de la manera que se describe a continuación. Los materiales de SANDAG están disponibles en otros idiomas. Para hacer una solicitud, llame al (619) 699-1900.

3.1 Las quejas deben ser presentadas dentro de los 180 días calendario del supuesto incidente de notificación del final de la Revisión Preliminar descrita anteriormente. Los reclamos deben presentarse por escrito y deben incluir una copia de cualquier correspondencia con relación al reclamo a FACT.

3.2 Los reclamos deben presentarse ante el Oficial de Cumplimiento del Título VI de SANDAG en 401 B Street, Suite 800, San Diego, CA 92101; número de fax (619) 699-1995; TTY (619) 699-1904.

3.3 Investigación: el Oficial de Cumplimiento del Título VI de SANDAG iniciará una investigación, que podrá incluir entrevistar, consultar o solicitar una respuesta por escrito sobre los temas que surgieron en el reclamo a cualquier individuo que el Oficial de Cumplimiento del Título VI de SANDAG considere que tenga información relevante, incluido el Oficial de Cumplimiento de la Ley sobre Estadounidenses con Discapacidades (Americans with Disabilities Act, ADA), personal de FACT y miembros del público. SANDAG también podrá sostener una audiencia informal.

3.4 Panel de revisión: el Oficial de Cumplimiento del Título VI de SANDAG convocará a un panel de revisión que estará compuesto por el Oficial de Cumplimiento del Título VI de SANDAG, el Oficial de Cumplimiento de la ADA, si corresponde, un miembro del personal de administración de SANDAG, el Director Ejecutivo Adjunto (o su designado) y (dependiendo de los temas) cualquier otro personal, según sea necesario. Este panel revisará la solicitud, investigará e intentará resolver los temas dentro de un plazo de treinta (30) días calendario a partir de que SANDAG reciba el reclamo.

3.5 Representación: la parte demandante y cualquier otra parte a quien esté dirigido el reclamo tendrán derecho a tener un representante.

3.6 Conclusiones y notificación: el Oficial de Cumplimiento del Título VI de SANDAG o el Oficial de Cumplimiento de la ADA preparará y le suministrará a la parte demandante, y a todas las otras partes involucradas, un informe final que contenga un resumen de la investigación, conclusiones por escrito y una disposición propuesta. Este informe se le suministrará a la parte demandante y a FACT dentro de un plazo de cuarenta y cinco (45) días calendario a partir de la presentación del reclamo formal.

3.7 Disposición final: la disposición propuesta por el panel de revisión entrará en vigencia de inmediato. La parte demandante o cualquier otra parte a quien esté dirigido el reclamo o la disposición propuesta podrán apelar. La apelación ante el Director Ejecutivo (como se establece a continuación) no suspenderá la implementación de la disposición propuesta por el panel de revisión de SANDAG, excepto en aquellas circunstancias en las cuales el Director Ejecutivo de SANDAG decida que existe un motivo suficiente para que corresponda la suspensión de la implementación.

4. **Apelación**
4.1 Dentro de un plazo de diez (10) días calendario a partir de la emisión del informe final, la parte demandante podrá apelar ante el Director Ejecutivo de SANDAG.

4.2 Para que se acepte una apelación, debe presentarse una solicitud de revisión por escrito ante el Director Ejecutivo de SANDAG.

4.3 La solicitud de revisión por escrito debe especificar la base particular fundamental, procesal o ambas, de la apelación y debe efectuarse por motivos que no sean la insatisfacción general con la disposición propuesta. Además, la apelación debe estar dirigida solo a los temas planteados en el reclamo formal presentado o a los errores procesales en la gestión del procedimiento de reclamo, y no a temas nuevos.

4.4 La revisión del Director Ejecutivo o su persona designada normalmente deberá limitarse a las siguientes consideraciones: ¿Influyeron los hechos y criterios correctos sobre la decisión? ¿Influyeron fundamentalmente hechos o criterios incorrectos o irrelevantes sobre la decisión en perjuicio de la parte demandante? ¿Hubo alguna irregularidad procesal que influyó fundamentalmente sobre el resultado de la cuestión en perjuicio de la parte demandante? Dados los hechos, los criterios, y el procedimiento, ¿fue ésta la decisión que hubiese tomado razonablemente una persona responsable de tomar decisiones?

4.5 Se esperará una copia de la decisión por escrito del Director Ejecutivo dentro de un plazo de treinta (30) días calendario a partir de la presentación de la apelación, la cual se enviará a todas las partes involucradas y, si corresponde, a las personas cuya autoridad será necesaria para llevar a cabo la disposición. El Director Ejecutivo podrá extender el plazo por un motivo justificado. La decisión del Director Ejecutivo sobre la apelación será la decisión definitiva de SANDAG.

5 Presentación de un reclamo ante la FTA. Cualquier persona que considere que ella misma, o cualquier clase específica de personas esté sometida a la discriminación prohibida bajo el Título VI, también podrá presentar un reclamo por escrito ante la FTA. Un reclamo debe presentarse antes de los 180 días a partir de la fecha de la presunta discriminación, a menos que la FTA extienda el plazo de presentación. Los reclamos del Título VI con relación a programas con financiamiento federal en FACT podrán enviarse a la agencia de financiamiento que corresponda a

Federal Transit Administration Office of Civil Rights
Attention: Title VI Program Coordinator
East Building, 5th Floor - TCR
1200 New Jersey Ave., SE
Washington, DC 20590
TITLE VI COMPLAINT FORM

SECTION I
NAME: _____________________________
ADDRESS: _______________________________________________________
PHONE #: ___________________________
E-MAIL ADDRESS: ________________________________

ACCESSIBLE FORMAT: LARGE PRINT ☐

SECTION II
Are you filing this complaint on your own behalf?

Yes ☐ No ☐

[If you answered "Yes" to this question, go to SECTION III.]

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

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 a third party.

Yes ☐ No ☐

SECTION III
On separate sheets, please describe your complaint. You should include specific details such as names, dates, times, route numbers, witnesses, and any other information that would assist us in our investigation of your allegations. Please also provide any other documentation that is relevant to this complaint.

Please mail this form with your full complaint and relevant documentation to:
FACT, Inc.
516 Civic Center Drive
Oceanside, CA 92054
FORMULARIO DE QUEJA Título VI

SECCIÓN I
NOMBRE: ________________________________________________________________

DIRECCIÓN: _____________________________________________________________

TELÉFONO: ___________________________

E-MAIL: _______________________________

FORMATO ACCESIBLE? ☐

SECCIÓN II
¿Está usted presentando esta queja en su propio nombre?

Sí ☐ No ☐

[Si respondió "Sí" a esta pregunta, ve a la Sección III.]

Si no es así, por favor proporcione el nombre y la relación de la persona para la cual se está quejando:

_____________________________________________________________________

Por favor, explique por qué usted ha presentado para un tercero.

______________________________________________________________________________

Por favor, confirme que ha obtenido el permiso de la parte perjudicada, si usted está presentando en nombre de un tercero.

Sí ☐ No ☐

SECCIÓN III

En hojas separadas, por favor describa su queja. Usted debe incluir detalles específicos, tales como nombres, fechas, horas, números de ruta, testigos y cualquier otra información que nos pueda ayudar en nuestra investigación de sus denuncias. Sirvanse proporcionar también cualquier otra documentación que sea relevante para la presente queja.

Por favor envíe este formulario con su denuncia y la documentación correspondiente a:

FACT, Inc.
516 Civic Center Drive
Oceanside, CA 92054
RideFACT POSTCARD (English – Front)

RideFACT

Senior (60+) transportation service available in all cities in San Diego County

How to find a ride:
Call 888-924-3228, Monday – Friday, 9am – 4pm

1. Referrals:
We help you find the most suitable transportation service. FACT maintains a database of all transportation services available in San Diego County.

2. RideFACT:
If there is no suitable and affordable transportation available, you may be approved to ride with RideFACT. RideFACT is a low cost transportation service operated by FACT. Please see more information on the back of this card.
RideFACT POSTCARD (English – Back)

RideFACT

Book your ride 888-924-3228

- Reservations are accepted up to 7 days in advance.
- Reservations are accepted 9am – 4pm on weekdays.
- You may travel between 7am - 8pm.
- Where possible, rides are shared.
- A companion may travel with you for free.
- Please tell us if you will bring a companion when you reserve your trip.

<table>
<thead>
<tr>
<th>One-Way Trip Distance</th>
<th>Fare</th>
</tr>
</thead>
<tbody>
<tr>
<td>0-5 Miles</td>
<td>$2.50</td>
</tr>
<tr>
<td>5.1-10 Miles</td>
<td>$4.00</td>
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<tr>
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<td>$5.00</td>
</tr>
<tr>
<td>Over 20 Miles</td>
<td>$10.00</td>
</tr>
</tbody>
</table>

Cancel your ride 888-924-3228

- To avoid service disruption please call and cancel your trip immediately if you are unable to travel.
- During evenings and weekends you may leave a message to inform us about the cancelation.

Phone: 888-924-3228
Email: factsd@factsd.org
Website: www.factsd.org

RideFACT is operated by FACT and funded by TransNet and USDOT grants
RideFACT POSTCARD (Spanish – Front)

RideFACT

Transportación para adultos de la tercera edad (Más de 60 años) disponible en todas las ciudades del Condado de San Diego.

Como programar su viaje:

Llame al 888-924-3228, Lunes – Viernes, 9am – 4pm

1. Referencias:
Le ayudamos a encontrar la transportación más adecuada para usted. FACT cuenta con una base de datos de todos los servicios de transportación disponibles en el Condado de San Diego.

2. RideFACT:
En caso de que no haya transportación adecuada y accesible para usted, podría ser aprobado para usar los servicios de transportación de RideFACT. RideFACT es un programa de transporte ación de bajo costo administrado por FACT. Más información en el reverso de esta tarjeta.
RideFACT Programe su viaje llamando al 888-924-3228

- Reservas se pueden hacer hasta con 7 días de anticipación.
- Llame de 9am – 4pm de Lunes a Viernes.
- Ofrecemos viajes de las 7am a las 8pm.
- Cuando es posible los viajes son compartidos.
- Un acompañante puede viajar gratis con usted.
- Cuando haga su reserva, por favor avísenos si traerá un acompañante con usted.

<table>
<thead>
<tr>
<th>Distancia</th>
<th>Costo</th>
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<tr>
<td>0-5 Millas</td>
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</tbody>
</table>

Cancele su viaje 888-924-3228

- Para evitar una interrupción en su servicio llame y cancele su viaje inmediatamente si le será imposible viajar.
- Durante las tardes o fin de semana puede dejar un mensaje para informarnos de su cancelación.

RideFACT es administrada por FACT y financiada con subsidios provenientes de TransNet y USDOT

Teléfono: 888-924-3228  
Correo electrónico: factsd@factsd.org  
Sitio de internet: www.factsd.org
"I can't tell you what a relief this service is. You relieved a great tension out of my heart."
- Marge, RideFACT rider

RideFACT
Serving all cities in San Diego County

RideFACT is operated by Facilitating Access to Coordinated Transportation (FACT), and funded by TransNet Senior Transportation Mini-Grants and USDOT grants.

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Phone: 888-924-3228
760-754-1252
Email: factsd@factsd.org
Address: 600 Mission Avenue
Oceanside, CA 92054

888-924-3228 888-924-3228 888-924-3228
RideFACT Riders Guide (English – Back)

RideFACT

RideFACT is a low cost transportation service for Seniors (60+). It is available 7 days a week for travel in all cities in San Diego County. The service can be used for any purpose, and is provided on a first come basis.

RideFACT is a shared ride service.

How to use RideFACT

Call (888) 924 - 3228 Monday - Friday between 9am - 4pm to schedule your trip. Trips may be scheduled up to 7 days in advance of the travel date. You may travel between 7am - 8pm, 7 days a week. Please have all the following information ready:

- The date of travel
- The time you need to arrive at your destination
- The time of your return trip
- The complete street address of your origin and destination
- Your name and name of any attendant, companion, or family member riding with you
- Your telephone number
- Your emergency contact

* Please note that RideFACT is for seniors who do not have any other transportation options. Our staff will assist you with using other services if options are available. You may also search for transportation options at www.factsd.org.

Preparing for your ride:

- Verify your addresses, pick-up times and the fare for your trip.
- Be prompt. Drivers are not required to wait for passengers who are not ready.
- Please wait at the curb or as close as possible to ensure the driver can locate you.
- Have the exact fare ready for the driver for every one-way trip. Drivers DO NOT give change.

Cancellations & changes:

It is important to cancel your trip as soon as you find out you no longer need to travel. To cancel, call (888) 924 - 3228 at any time and leave a message or inform a representative.
RideFACT Riders Guide (Spanish – Front)

"No te puedo decir que descanso es este servicio. Me han quitado un gran peso de encima a mi corazón”
-Marge, pasajero de RideFACT

RideFACT Sirviendo todas las ciudades en el condado de San Diego

<table>
<thead>
<tr>
<th>Distancia del viaje un sentido</th>
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RideFACT es operado por FACT y financiado por TransNet Senior Transportation Mini-Grants y por becas de USDOT

888-924-3228 888-924-3228 888-924-3228

Teléfono: 888-924-3228
760-754-1252
Correo electrónico: factsd@factsd.org
Dirección: 600 Mission Avenue
Oceanside, CA 92054
RideFACT es un programa de bajo costo para personas de la tercera edad (mayores de 60 años). El servicio se presta los 7 días de la semana para viajar por todo el condado de San Diego, puede usarse por cualquier razón y está sujeto a disponibilidad.

RideFACT es un servicio de transporte en grupo.

Llame (888) 924-3228 de lunes a viernes entre las 9 AM y las 4 PM para programar su viaje. Viajes pueden ser programados hasta con una semana de anticipación. Puede viajar de las 7 AM a las 8 PM, 7 días de la semana. Por favor tenga esta información lista:

- El día de su viaje
- El tiempo que necesita para llegar a su destino
- La hora que desea comenzar su viaje
- Su dirección completa y la dirección completa de a donde necesita ir.
- Su nombre y el nombre de su acompañante
- Su número de teléfono
- Un contacto para caso de emergencia

*Por favor note que RideFACT es para personas que no tienen ninguna otra opción de transporte. Nuestro equipo le guiará en cómo usar otros servicios que tenga disponibles. Usted también puede buscar opciones de transporte en www.factsd.org.

Preparándose para su viaje:

- Verifique las direcciones, la hora en que va a ser recojido y el pago del servicio.
- Esté atento. Los choferes no están obligados a esperar por pasajeros que no están listos.
- Por favor espere en la banqueta de manera que el chofer lo pueda encontrar.
- Tenga el pago exacto listo para el chofer por cada viaje. Los choferes no tienen cambio.

Cancelaciones y cambios:

Es importante cancelar su viaje tan pronto como le sea posible. Para cancelar llame al (888) 924-3228 a cualquier hora y deje un mensaje para informarnos.
QUESTIONS ABOUT FACT’S LANGUAGE SERVICES?
Call FACT and we will help you in your language.

¿PREGUNTAS SOBRE LOS SERVICIOS DE IDIOMAS DE FACT?
Llame a FACT y le ayudaremos en su idioma.

888-924-3228
FACT BOARD RESOLUTIONS

RESOLUTION OF THE BOARD OF DIRECTORS
of
FACILITATING ACCESS TO COORDINATED TRANSPORTATION (FACT)

RESOLUTION AUTHORIZING UPDATES TO TITLE VI PLAN FOR THE AGENCY

WHEREAS, FACT desires to comply with Title VI of the Civil Rights Act of 1964, including new provisions detailed in U.S. Department of Transportation’s FTA Circular 4702.1B, “Title VI Requirement and Guidelines for Federal Transit Administration Recipients,”

WHEREAS, the Board of Directors wishes to authorize approval of the compliance plan updates developed by staff to comply with necessary provisions of the Civil Rights Act,

NOW, THEREFORE BE IT RESOLVED by the Board of Directors of FACT as follows:

1. The Executive Director is authorized to implement the components of the plan in order to meet Federal requirements.

2. The Executive Director is authorized to implement policies that may be necessary to comply with subsequent revisions or interpretations to the Civil Rights Act.

The 2020 Title VI plan updates - PASSED AND ADOPTED by the Board of Directors of FACT in the State of California on the 28th day of May, 2020.

George Gastli, Board Chair

Date

ATTEST:

LaVonna Connelly, Board Secretary

Date