

City of Manhattan Beach

TITLE VI PROGRAM

Developed and Approved: December 17, 2019
Approved by: City of Manhattan Beach City Council

Dial-A-Ride Office 1400 Highland Avenue, Manhattan Beach, CA 90266
(310)802-5407. www.citymb.info

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Introduction

The City of Manhattan Beach's Commitment to Civil Rights

The City of Manhattan Beach is a recipient of federal funds and adheres to Title VI of the Civil Rights Act of 1964 which prohibits discrimination on the basis of race, color, and national origin in programs and services receiving federal financial assistance.

- City services are provided in a nondiscriminatory manner and the opportunity for full and fair participation is offered to all program participants and community members. The City has examined the need for services and materials for persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English.
- This program has been prepared in accordance with Section 601 of Title VI of the Civil Rights Act of 1964 and Executive Order 13116 (Improving Access to Services for Persons with Limited English Proficiency).

City of Manhattan Beach Dial-A-Ride personnel were involved with the development of the City of Manhattan Beach Title VI Program. The Dial-A-Ride Program Supervisor is responsible for implementing the Title VI Program. Data was used from the United States Census Bureau, 2010, Demographic Profile Data to prepare the Title VI Program.

General Requirements

Notice to the Public

Notifying the Public of Rights Under Title VI

City of Manhattan Beach

The City of Manhattan Beach operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the City of Manhattan Beach.

For more information on the City of Manhattan Beach civil rights program, and the procedures to file a complaint, contact (310) 802-5000, or visit our administrative office at 1400 Highland Avenue, Manhattan Beach, CA 90266. For more information, visit:
www.citymb.info/titleVIPlan.

A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590

If information is needed in another language, contact (310) 802-5407.

List of Locations Where Title VI Notice Is Posted

The City of Manhattan Beach Title VI notice to the public is currently posted at the following locations:

Location Name	Address	City
City Hall	1400 Highland Ave.	Manhattan Beach
Joslyn Center	1601 N. Valley Drive	Manhattan Beach
Manhattan Heights Community Center	1600 Manhattan Beach Blvd.	Manhattan Beach

The Title VI notice and program information is also provided on the City of Manhattan Beach website at www.citymb.info/titleVIPlan.

Discrimination Complaint Procedures

The Title VI Complaint form and complaint procedures are available at our administrative offices and on our website.

Procedures: *As a subrecipient of federal dollars, the City of Manhattan Beach is required to comply with Title VI of the Civil Rights Act of 1964 and ensure that services and benefits are provided on a non-discriminatory basis. City of Manhattan Beach has in place a Title VI Complaint Procedure and Title II Americans with Disabilities Act (ADA) Complaint Procedure, which outlines a process for local disposition of Title II and Title VI complaints and is consistent with guidelines found in the Federal Transit Administration Circular 4702.1B, dated October 1, 2012.*

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by the City of Manhattan Beach may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form. City of Manhattan Beach investigates complaints received no more than 180 days after the alleged incident. The City of Manhattan Beach will only process complaints that are complete.

Within 10 business days of receiving the complaint, City of Manhattan Beach will review it to determine if our office has jurisdiction. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office. City of Manhattan Beach has 30 days to investigate the complaint. The complainant will be notified in writing of the cause to any planned extension to the 30-day rule.

If more information is needed to resolve the case, City of Manhattan Beach may contact the complainant. The complainant has 10 business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within 10 business days City of Manhattan Beach can administratively close the case.

*A case can be administratively closed also if the complainant no longer wishes to pursue their case. After the investigator reviews the complaint, she/he will issue one of two letters to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. A LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member, or other action will occur. If the complainant wishes to appeal the decision, she/he has 10 business days after the date of the letter or the LOF to do so. A person may also file a complaint directly with the Federal Transit Administration, at **FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590. Request a Title VI Complaint Form.***

Discrimination Complaint Form

COMPLAINT FORM

Section I: Please write legibly		
1. Name:		
2. Address:		
3. Telephone:	3.a. Secondary Phone (Optional):	
4. Email Address:		
5. Accessible Format Requirements?	<input type="checkbox"/> Large Print	<input type="checkbox"/> Audio Tape
	<input type="checkbox"/> TDD	<input type="checkbox"/> Other
Section II:		
6. Are you filing this complaint on your own behalf?	YES*	NO
*If you answered "yes" to #6, go to Section III.		
7. If you answered "no" to #6, what is the name of the person for whom you are filing this complaint? Name:		
8. What is your relationship with this individual:		
9. Please explain why you have filed for a third party:		
10. Please confirm that you have obtained permission of the aggrieved party to file on their behalf.	YES	NO
Section III:		
11. I believe the discrimination I experienced was based on (check all that apply):		
<input type="checkbox"/> Race	<input type="checkbox"/> Color	<input type="checkbox"/> National Origin
12. Date of alleged discrimination: (mm/dd/yyyy)		
13. Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known), as well as names and contact information of any witnesses. If more space is needed, please attach additional sheets of paper.		

COMPLAINT FORM

Section IV:		
14. Have you previously filed a Title VI complaint with City of Manhattan Beach?	YES	NO
Section V:		
15. Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?		
<input type="checkbox"/> YES* <input type="checkbox"/> NO		
If yes, check all that apply:		
<input type="checkbox"/> Federal Agency _____	<input type="checkbox"/> State Agency _____	

<input type="checkbox"/> Federal Court _____		<input type="checkbox"/> Local Agency _____	
<input type="checkbox"/> State Court _____			
16. If you answered "yes" to #15, provide information about a contact person at the agency/court where the complaint was filed.			
Name:			
Title:			
Agency:			
Address:			
Telephone:		Email:	
Section VI:			
Name of Transit Agency complaint is against:			
Contact Person:			
Telephone:			

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

Signature and date are required below to complete form:

Signature _____ Date _____

Please submit this form in person or mail this form to the address below:

City of Manhattan Beach, Dial-A-Ride Supervisor
 1400 Highland Ave.
 Manhattan Beach, CA 90266

Active Lawsuits, Complaints or Inquiries Alleging Discrimination

The chart below lists any open/active transit-related Title VI investigations (i.e. discrimination based on race, color and national origin), complaints, and lawsuits against the City of Manhattan Beach Dial-A-Ride program over the past three years, not investigated by FTA.

As of the writing of this program, there are 0 complaints pending which allege discrimination on the grounds of race, color, or national origin.

Type (Investigation, Lawsuit, Complaint)	Date	Summary of Complaint	Status	Action(s) Taken
N/A				

PUBLIC PARTICIPATION PLAN

Key Principles:

- The City of Manhattan Beach ADA and Dial-A-Ride programs provide Customer Satisfaction Surveys regularly to all registered riders and concerned residents to obtain feedback on the service provided. Dial-A-Ride sends out surveys in the mail once every two years to all registered riders to obtain feedback on the service provided. A stamped, addressed envelope is provided for Dial-A-Ride customers to return the survey anonymously. Additionally, stamped suggestion cards are available on the Dial-A-Ride buses if someone wants to mail in feedback about their ride or overall Dial-A-Ride service. The desired outcome of providing a survey is to evaluate the current service, determine where improvements can be made and offer customers the opportunity to provide any feedback regarding the Dial-A-Ride and accessibility programs.

Public Participation Process

- Information on the Dial-A-Ride program is available to the general public at the Joslyn Community Center, 1601 Valley Drive, Manhattan Beach, CA 90266. The results of the biennial customer

satisfaction survey are also on display at the Joslyn Community Center and on the City website for public viewing.

- Information on the ADA program is available on the City of Manhattan Beach website.
- The public will be engaged and City Council approval will be required when the following service changes occur:
 - an increase or decrease in fares is being considered
 - a cut or increase service is being considered
 - or, a change to the approved service area is considered
- City Council agendas are posted 72 hours in advance of meetings. Manhattan Beach, a General Law City, has a five-member City Council, elected at large to formulate policy for the city. Each member serves a nine (9) month mayoral position during their four (4) year term.
- City Council meetings are held on the first and third Tuesday of every month at 6:00 PM in Council Chambers located in City Hall at 1400 Highland Avenue. Public participation and input is encouraged. Meetings may be rescheduled to an alternate date or cancelled by City Council minute action. Please check the City Calendar to note any changes or contact the City Clerk's office at (310) 802-5056.
- In Manhattan Beach, persons with Limited English Proficiency (LEP) constitute less than 5% of the total population, therefore specific outreach to the LEP population does not exist. The City of Manhattan Beach works closely with Beach Cities Health District, preventive health agency, to ensure that residents who are low-income and/ or disabled have knowledge of the City of Manhattan Beach Dial-A-Ride program. The City also partners with organizations in the community that serve persons with developmental disabilities including the CHOICE program of Manhattan Beach Unified School District and EVOLVE program.

Public Meetings

A public City Council meeting will be held when the following service changes occur:

- an increase or decrease in fares is being considered for City's Dial-A-Ride program
- a cut or increase service is being considered for City's Dial-A-Ride program
- or, a change to the approved service area is considered for City's Dial-A-Ride Program

Dial-A-Ride will remain open to transport citizens to City Council Meetings as requested, even though the meetings are held after traditional service hours.

The City of Manhattan Beach posts information about City Council meetings on the City's website. Additionally, City Council notices are posted:

City Hall, 1400 Highland Avenue

Joslyn Center 1601 N. Valley Drive

Manhattan Heights Community Center 1600 Manhattan Beach Blvd.

Addressing Comments

As a small Dial-A-Ride program, public comments and complaints are addressed individually by the Dial-A-Ride Program Supervisor. Comments or complaints that would lead to a service change are also addressed by the Parks and Recreation Director, and brought to the Senior Advisory Committee for consideration.

Identification of Stakeholders

Our Community Partners: Beach Cities Health District and Alzheimer's Association

- The City of Manhattan Beach contracts with Beach Cities Health District for Care Management services. BCHD is on sight weekly and available to assist if there are LEP issues.
- Alzheimer's Association specializes in assisting people with memory issues. Alzheimer's Association provides monthly programs at the City of Manhattan Beach Joslyn Center and would be available as needed on an on-call basis.

LANGUAGE ASSISTANCE PLAN

Purpose of the Language Assistance Plan

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance. One critical concern addressed by Title VI is the language barrier that Limited English Proficiency (LEP) persons face with respect to accessing information about and using transit service. Transit operators must ensure that this group has adequate access to the agency's programs and activities, including public participation opportunities.

Executive Order 13166, titled "Improving Access to Services for Persons with Limited English Proficiency," forbids funding recipients from "restricting an individual in any way in the enjoyment of any advantage or privilege enjoyed by others receiving any service, financial aid, or other benefit under the program," or from "utilize[ing] criteria or methods of administration which have the effect of subjecting individuals to discrimination because of their race, color, or national origin, or have the effect of defeating or substantially impairing accomplishment of the objectives of the program as respects to individuals of a particular race, color, or national origin."

FTA Circular 4702.1B was developed by the Federal Transit Administration (FTA) and details the administrative and reporting requirements for recipients of FTA financial assistance to comply with Title VI and related executive orders including on LEP.

The United States Department of Transportation (DOT) published guidance that directed its recipients to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for LEP customers. The City of Manhattan Beach language assistance plan (LAP) includes two sections. The first section consists of a four factor analysis and implementation plan that complies with the requirements of DOT LEP guidance. The second section of this document discusses the results of the Four-Factor Analysis and the implementation of the Language Assistance Plan.

Improving Access for People with Limited English Proficiency:

In order to ensure meaningful access to programs and activities, the City of Manhattan Beach uses the information obtained in a Four Factor Analysis to determine the specific language services that are appropriate. This analysis helps the City of Manhattan Beach to determine if it communicates effectively with LEP persons and informs language access planning.

Factor 1 - Number of LEP Persons in Service Region:

No LEP communities exist in the City of Manhattan Beach. Demographic data was acquired from the 2010 Census. Persons with Limited English Proficiency (LEP) constitute fewer than 5% of the total population, therefore vital documents are not translated into the primary language of the small percentage of residents.

Factor 2 - Frequency of LEP Use

Since there are no LEP communities in the City of Manhattan Beach, Dial-A-Ride staff were surveyed to determine if there were any riders who currently have limited English proficiency. Only one Korean-speaking rider was determined, and that person has a family member to assist with scheduling rides and accompanying her on trips.

Factor 3: The Importance of Your Program to People's Lives

Dial-A-Ride is an affordable, important program in the community for seniors 55 and over and persons with disabilities. The service allows transportation anywhere within the City of Manhattan Beach seven days a week and trips to approved medical facilities in Torrance, Redondo Beach and Hermosa Beach.

Factor 4: Internal resources for outreach for disadvantaged populations/LEP

Since there are no LEP communities in the City of Manhattan Beach, there are no costs associated with providing language assistance. The City of Manhattan Beach has certified bilingual staff (who speak Spanish) who assist customers as needed. These employees receive Bilingual Pay to perform translation duties on a regular basis.

Language Assistance Plan

In Manhattan Beach, California, persons with Limited English Proficiency (LEP) constitute fewer than 5% of the total population, therefore vital documents are not translated into the primary language of the small percentage of residents.

GRANTS, REVIEWS and CERTIFICATIONS:

The City of Manhattan Beach has two pending FTA grants, one through the Parks and Recreation Department for four Dial-A-Ride buses in the amount of \$462,600 and the other through the Public Works Department in the amount of \$540,000 for an Aviation Blvd. missing sidewalk project. If the grants are awarded by the FTA, payments will be made in 2020 and 2021.

CONTACT

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

Dial-A-Ride Supervisor
1400 Highland Avenue, Manhattan Beach, CA 90266
310-802-5407
www.citymb.info/titleVIPlan