

# City of Vista



## TITLE VI COMPLIANCE PROGRAM

**Approved by City of Vista City Council:  
August 8, 2023**

**200 Civic Center Dr.  
Vista, CA 92084  
(760) 726-1340  
[www.cityofvista.com](http://www.cityofvista.com)**

### INTRODUCTION

This document was prepared by the City of Vista to comply with Title VI of the Civil Rights Act of 1964, including provisions detailed in U.S. Department of Transportation's FTA Circular 4702.1B, "Title VI Requirement and Guidelines for Federal Transit Administration Recipients."

## Table of Contents

Title VI Notice to the Public	Pg. 3
List of Locations Where Title VI Notice Is Posted	Pg. 4
Title VI Complaint Procedures	Pg. 5
Title VI Complaint Form	Pg. 6
List of Transit-Related Title VI Investigations, Complaints, and Lawsuits	Pg. 12
Public Participation Plan	Pg. 13
Language Assistance Plan	Pg. 15
Table Depicting the Membership of Non-Elected Committees And Councils	Pg. 20
Title VI Equity Analysis	Pg. 20
City Council Approval of Title VI Program	Pg. 21

## City of Vista Title VI Notice to the Public

1.

### Notifying the Public of Rights under Title VI

## City of Vista

- The City of Vista 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 Vista.
- For more information on the City of Vista civil rights program, and the procedures to file a complaint, contact (760) 726-1340, or visit the City's Human Resources offices at 200 Civic Center Dr. Vista, CA 92084. For more information, visit [www.cityofvista.com](http://www.cityofvista.com).
- 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 (760) 726-1340.

Notificación al público de los derechos bajo el Título VI

## City of Vista

- El Ayuntamiento de Vista (en adelante City of Vista) opera sus programas y servicios sin distinción de raza, color y origen nacional de acuerdo al Título VI de la Ley de Derechos Civiles. Cualquier persona que cree que ha sido agraviada por cualquier práctica discriminatoria ilegal bajo el título VI puede presentar una queja en las oficina de City of Vista.
- Para obtener información adicional sobre el programa derechos civiles de City of Vista y el procedimientos para entablar una queja, llame al (760) 726-1340, o visite nuestra oficina de Recursos Humanos localizada en 200 Civic Center Dr. Vista, Ca 92084. Para obtener información adicional, visite [www.cityofvista.com](http://www.cityofvista.com).
- Un reclamante puede presentar una queja directamente con la oficina de Administración Federal de Tránsito (*Federal Transportation Administration*) por medio de enviarle a la oficina de Derechos Civiles la queja usando la siguiente información: Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590
- Si se necesita información en otro idioma, contacte al (760) 726-1340.

## 2. List of Locations Where Title VI Notice Is Posted

The City of Vista Title VI Notice(s) to the Public are currently posted at the following locations:

Location Name	Address	Room or Area
McClellan Adult Activity and Resource Center	1400 Vale Terrace Drive	Out & About Transportation Office
Vista Civic Center	200 Civic Center Drive	Human Resources Offices
5 City Buses	1400 Vale Terrace Drive	Bus Entry

The Title VI notice and program information is also on the City of Vista website at [www.cityofvista.com/city-services/city-departments/human-resources](http://www.cityofvista.com/city-services/city-departments/human-resources).

## Title VI Complaint Procedures

As a recipient of federal dollars, the City of Vista 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. The City of Vista has in place a Title VI Complaint Procedure, which outlines a process for local disposition of 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, national origin, sex, religion, disability, or age by the City of Vista may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form. The complaint should be submitted by the complainant or the complainant's authorized representative as soon as possible but no later than 180 calendar days after the alleged violation to:

Dolores Gascon, Human Resources Director  
200 Civic Center Drive, Vista, CA 92084  
dgascon@cityofvista.com  
Tel: 760.639-6145 | Fax: 760.639.6146 | Free Relay Service: 711

Within 15 calendar days after receipt of the complaint, Dolores Gascon or her designee will meet with the complainant to discuss the complaint and the possible resolutions. Within 15 calendar days of the meeting, Dolores Gascon or her designee will respond in writing, and where appropriate, in a format accessible to the complainant, such as large print, Braille, or audio tape. The response will explain the position of the City of Vista and offer options for substantive resolution of the complaint.

If the response by Dolores Gascon or her designee does not satisfactorily resolve the issue, the complainant and her designee may appeal the decision within 15 calendar days after receipt of the response to the City Manager or the City Manager's designee (collectively, "City Manager").

Within 15 calendar days after receipt of the appeal, the City Manager will meet with the complainant to discuss the complaint and possible resolutions. Within 15 calendar days after the meeting, the City Manager will respond in writing, and, where appropriate, in a format accessible to the complainant, with a final resolution of the complaint.

All written complaints received by Dolores Gascon or her designee, appeals to the City Manager, and responses from these two offices will be retained by the City of Vista for at least three years.

Any person may also file a complaint directly with the Federal Transit Administration, at the following address:

FTA Office of Civil Rights  
1200 New Jersey Avenue SE

Washington, DC 20590.

### City of Vista Title VI Complaint Form

#### COMPLAINT FORM

<b>Section I: Please write legibly</b>		
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
<b>Section II:</b>		
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
<b>Section III:</b>		
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 <input type="checkbox"/> Disability <input type="checkbox"/> Other		
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.

**City of Vista Title VI Complaint Form, Page 2**

**COMPLAINT FORM**

<b>Section IV:</b>		
14. Have you previously filed a Title VI complaint with the City of Vista?	YES	NO
<b>Section V:</b>		
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:
<b>Section VI:</b>		
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 Vista  
Attn: Human Resources, Title VI Coordinator  
200 Civic Center Drive  
Vista, CA 92084

## **Procedimientos de Quejas del Título VI**

Como beneficiario de fondos federales, el Ayuntamiento de Vista (en adelante, *City of Vista*) está obligado a cumplir con el Título VI de la Ley de Derechos Civiles de 1964 y asegurar que los servicios y prestaciones se brinden sobre una base no discriminatoria. City of Vista tiene establecido un Procedimiento de Quejas del Título VI, que describe un proceso para la disposición local de las quejas del Título VI que es coherente con las directrices que se encuentran en el Circular 4702.1B de la Oficina Administrativa Federal de Tránsito (*Federal Transit Administration*) de fecha primero de octubre del 2012.

Cualquier persona que cree que él o ella ha sido víctima de discriminación en base a raza, color, origen nacional, sexo, religión, discapacidad, o edad por parte de City of Vista puede presentar una queja del Título VI por medio de llenar y entregar el Formulario de Queja de la agencia. La queja debe ser presentada por el reclamante o el representante autorizado de este, tan pronto como sea posible, pero a más tardar 180 días hábiles después del supuesto quebrantamiento, a:

Dolores Gascon, Coordinadora de Recursos Humanos / ADA<sup>1</sup> / Coordinadora del Título VI  
200 Civic Center Drive, Vista, CA 92084  
dgascon@cityofvista.com  
Tel.: 760.639-6145 | Fax: 760.639.6146 | Servicio telefónico de relevo gratuito: 711

Dentro de los 15 días hábiles siguientes a la recepción de la queja, Dolores Gascon o su representante se reunirá con el reclamante para discutir la queja y las posibles soluciones. Dentro de los 15 días hábiles a partir de la reunión, Dolores Gascon o su representante responderá por escrito, y en su caso, en un formato accesible para el reclamante, tales como letra grande, braille o cinta de audio. La respuesta explicará la posición de la Ciudad de Vista y ofrecerá opciones substanciales para la resolución de la queja.

---

<sup>1</sup> Ley de Norteamericanos con Discapacidades

Si la respuesta por Dolores Gascon o su representante no resuelve satisfactoriamente el asunto, el reclamante o su representante puede apelar la decisión dentro de los 15 días hábiles después de haber recibido la respuesta del Administrador de City of Vista o su representante (en conjunto, en adelante, *City Manager*).

Dentro de los 15 días hábiles después de haber recibido la apelación, el City Manager se reunirá con el reclamante para discutir la queja y las posibles soluciones. Dentro de los 15 días hábiles después de la reunión, el City Manager responderá por escrito y, en su caso, en un formato accesible para el reclamante, con una resolución final de la queja.

Todas las quejas recibidas por escrito por Dolores Gascon o su representante, apelaciones interpuestas ante el City Manager, y las respuestas de estas dos oficinas serán archivadas por City of Vista por un mínimo de tres años.

Cualquier persona puede presentar una queja directamente con la Administración Federal de Tránsito, a la siguiente dirección:

FTA Office of Civil Rights  
1200 New Jersey Avenue SE  
Washington, DC 20590.

## Formulario de Quejas del Título VI

### FORMULARIO DE QUEJAS DEL TÍTULO VI

<b>Sección I: Favor de escribir en letra redonda para que sea legible</b>		
1. Nombre:		
2. Dirección:		
3. Teléfono:		3.a. Teléfono secundario (Opcional):
4. Correo electrónico:		
5. ¿Requisitos de formato accesible?	<input type="checkbox"/> Letra más grande	<input type="checkbox"/> Audio casete
	<input type="checkbox"/> TDD	<input type="checkbox"/> Otros
<b>Sección II:</b>		
6. ¿Está entablando esta queja por parte suya?		SÍ*      NO
*Si contestó "SÍ" pase al #6, pase a la Sección III.		
7. Si contestó "no" a #6, ¿cuál es el nombre de la persona para quién está entablando la queja? Nombre:		
8. ¿Qué relación tienen con esta persona?:		
9. Por favor indique el motivo por el cual está actuando a nombre de otra persona:		
10. Por favor confirme que tiene el permiso de la parte agraviada para actuar a su nombre.		SÍ      NO
<b>Sección III:</b>		
11. Pienso que se fui discriminado por motivo de (marcar con un cheque todo lo que corresponde):  <input type="checkbox"/> Raza <input type="checkbox"/> Color <input type="checkbox"/> Origen nacional <input type="checkbox"/> Discapacidad <input type="checkbox"/> Otro		
12. Fecha de la supuesta discriminación: (mes/día/año completo)		
13. Explique detalladamente lo que pasó y por qué piensa que fue discriminado. Describa a todas las personas involucradas. Incluya los nombres y datos de contacto de la persona(s) que lo discriminó (si lo sabe), así como los nombres y datos de contacto de cualquier testigo. Si necesita más espacio para escribir, por favor adjunte hojas de papel adicionales.		

## Página 2—Formulario de Quejas del Título VI

### FORMULARIO DE QUEJAS DEL TÍTULO VI

<b>Sección IV:</b>		
14. ¿Alguna vez ha entablado una queja del Título IV en las oficina de City of Vista?	SÍ	NO
<b>Sección V:</b>		
15. ¿Ha entablado esta queja ante otra oficina federal, estatal o local, o ante un tribunal federal o estatal? <input type="checkbox"/> SÍ* <input type="checkbox"/> NO Si contestó SÍ, indique cuáles: <input type="checkbox"/> Agencia federal _____ <input type="checkbox"/> Agencia estatal _____ <input type="checkbox"/> Tribunal federal _____ <input type="checkbox"/> Agencia local _____ <input type="checkbox"/> Tribunal estatal _____		
16. Si contestó SÍ la pregunta número 15, proporcione los datos de contacto para la persona encargada de la agencia/tribunal donde entabló la queja.		
Nombre:		
Cargo:		
Agencia:		
Dirección:		
Teléfono:		Correo electrónico:
<b>Sección VI:</b>		
Nombre de la agencia de tránsito contra quien se entabla la queja:		
Persona de contacto:		
Teléfono:		

Puede adjuntar cualquier documento escrito u otra información que piensa que puede ser relevante para la queja.

Firma: \_\_\_\_\_

Fecha: \_\_\_\_\_

Por favor de entregar en persona o enviar por correo este formulario a la siguiente dirección:

City of Vista  
 Attn: Human Resources, Title VI Coordinator  
 200 Civic Center Drive  
 Vista, CA 92084

### 3. List of Transit-Related Title VI Investigations, Complaints, and Lawsuits

The City of Vista has not been involved in any transportation-related Title VI investigations, lawsuits or complaints.

**City of Vista List of Investigations, Lawsuits and Complaints**

Type of Process	Date	Summary (including basis of complaint)	Status	Action(s) Taken
Investigations				
1. <i>None</i>				
2.				
Lawsuits				
1. <i>None</i>				
2.				
Complaints				
1. <i>None</i>				
2.				

## 4. Public Participation Plan

The Public Participation Plan outlines the strategies that the City of Vista will use to engage the public in the process of transportation decisions. This plan is utilized to cultivate relations with the community and encourage interaction with minority and non-English speaking residents. Public Notices and general information will be provided in both English and Spanish.

### a. OPPORTUNITIES FOR PUBLIC COMMENT:

The City of Vista routinely provides opportunities for public comment, and continually strives to find new and innovative opportunities to solicit public comments and involve all segments of the population. Comments are accepted at any time by phone, fax, email, US mail, through social media (e.g. Facebook) in person, or at any open meeting. Examples of these opportunities include:

- **City Council:** The public is notified of twice monthly City of Vista City Council meetings, which the public is invited to attend. Meeting announcements are posted at the Vista Civic Center, the Vista library, and on the City's website ([www.cityofvista.com](http://www.cityofvista.com)). Every City Council meeting has an "Oral Comments" portion section of the meeting which provides the public with the opportunity to speak on any City related topics.
- **Senior Citizens Affairs Commission:** The City of Vista's Senior Citizens Affairs Committee, meets bi-monthly to discuss and become educated about the needs of the residents of Vista and other seniors. The public is invited to attend and present comments or concerns about any senior related topic or program, including the City's Out & About Senior transportation program. Notices are posted at the Vista Civic Center, and on the City's website.
- **Surveys:** Rider Surveys are conducted at least once annually. Riders are asked to comment about the transportation services and make suggestions. These surveys are mailed to volunteer drivers and handed out directly to Out & About riders.
- **Community Events & Presentations:** City staff members and members of the Senior Citizens Affairs Commission regularly make presentation to senior groups (e.g. Senior Mobile Home Parks, Library Presentations, etc.) about the services City of Vista provides to seniors. These meetings and presentations are generally advertised by press release, on the City's website and City publications. These meetings and presentations provide an opportunity for members of the public to learn and make comments on City programs for seniors, including senior transportation programs.

### b. ENGAGING TITLE VI PROTECTED GROUPS

The City of Vista realizes that there are large segments of the population from whom input is rarely, if ever received. In an effort to hear a truly representative voice of the public, the City of Vista will make all significant service-related planning and policy publications available in accessible formats for seniors, including those with disabilities through the following steps.

- Continue to make senior transportation related documents (e.g. informational brochures and rider applications) available in Spanish.
- Continue to provide Spanish speaking staff to communicate with our senior transportation program's most significant non-English speaking population.
- Communicate with our bi-lingual Spanish speaking Senior Center program participants to request the ability to make presentations to their religious, community connections or other groups with significant LEP populations.

c. PUBLIC OUTREACH

City of Vista staff participate in various community events and conducts presentations at various organizations, mobile home communities, public and private schools, and religious organizations to provide information on City programs and to determine what services are most frequently sought by LEP population.

d. STAFF ACCESSIBLE

The City has a list of over 45 regular employees that are accessible in person, on the phone, by mail, by fax, or by email for Spanish translation services.

e. PROVIDE SERVICE FOR THE DISABLED AND LEP

Upon advanced notice, special accommodations will be provided for public meetings. These services include translators, special assistance, and or transportation.

### ***Purposes of this Plan***

Public participation is the process through which stakeholders can partake directly in agency decision-making, and express their concerns, desires, and values. It is the purpose of this plan to improve the lives Vista's seniors, included those with disabilities, by creating transportation opportunities to maximize their independence. At every opportunity, the City of Vista will solicit input from stakeholders in order to best support persons served without creating disproportionately high and adverse human health or environmental impact on minority and/or low-income populations.

## ***Summary of Outreach Efforts***

The following is a summary of outreach efforts conducted by the City of Vista as they relate to Title VI requirements under the Public Participation Plan. Many of our activities are conducted in partnership with other agencies or ad hoc outreach with other service organizations and non-profit agencies within the community. This is in no way a complete list but rather documents the agency's outreach efforts as they relate specifically to minority and low-income populations.

**City Council Meetings Open to the Public:** City of Vista twice monthly City Council meetings are open to the public and announced on the agency's website and by the local newspaper.

**Senior Citizens Affairs Commission Meetings Open to the Public:** City of Vista Senior Citizens Affairs Commission bimonthly (every other month) meetings are open to the public and announced on the agency's website and in monthly newsletter.

**San Diego Volunteer Drive Coalition:** Out & About Vista was a founding member of the San Diego County Volunteer Driver Coalition (SDCVDC), which started in February 2007, and has been an active participant ever since. Out & About Vista staff through coordination with other member agencies of the SDCVDC can share strategies on effective ways to conduct outreach to minority and low-income populations and specifically LEP Spanish speaking populations.

**Community Events & Presentations:** City staff members and members of City Council appointed Commission's including the Senior Citizens Affairs Commission regularly make presentations to groups (e.g. Senior Mobile Home Parks, Library Presentations, etc.) about the services City of Vista provides to seniors. These meetings and presentations are generally advertised by press release, on the City's website and City publications. These meetings and presentations provide an opportunity for members of the public to learn and make comments on City programs for seniors, including senior transportation programs.

**City of Vista Website:** Currently, the City of Vista posts notices and announcement on the agency's website. Additional public input can be obtained by the Title VI Complaint Form, which is available as a download in English and Spanish. [www.cityofvista.com/city-services/city-departments/human-resources](http://www.cityofvista.com/city-services/city-departments/human-resources)

**Coordination with Senior Center Participants:** Staff continues to work with our bi-lingual Spanish speaking Senior Center program participants to coordinate opportunities to conduct outreach or make presentations to our participants, religious, community, and other group connections with significant populations with LEP

## Language Assistance Plan

### *Overview*

Title VI of the Civil Rights Act of 1964 prohibits recipients of federal financial assistance from discriminating against or otherwise excluding individuals on the basis of race, color, or national origin in any of their activities. It has been recognized that one form of discrimination occurs through an inability to communicate due to a limited proficiency in the English language. Title VI of the Civil Rights Act of 1964, Executive Order 13166, and various directives from the US Department of Justice (DOJ) and the US Department of Transportation (DOT) require federal aid recipients to take reasonable steps to ensure meaningful access to programs, services, and activities by those who do not speak English proficiently.

To determine the extent to which LEP services are required and in which languages, the law requires the analysis of four factors. The following sections address each of these with respect to the City of Vista transportation service area.

### **Factor 1: Review of LEP Populations:**

Understanding the needs of the community begins with identifying the number of persons with Limited English Proficiency (LEP) eligible to be served, likely to be served, or likely to be encountered by City of Vista through its programs, services, or activities.

Methodology for Data Sources:

- To determine potential LEP needs in the City of Vista planning area, staff reviewed the latest data available through the US Census Bureau American Community Survey for 2021.

#### American Community Survey

The U.S. Census Bureau-2021 Estimate American Community Survey (ACS) Language Spoken at Home by the Ability to Speak English estimates that of the 110,255 Vista residents (Service Area includes 92081, 92083 and 92084 Zip Codes), 38,107 speak Spanish at home and 13,520 or 12% speak English less than "very well". All other non-English languages represent approximately 5,128 persons or less than 5% of the total Vista population.

<b>Vista, California</b>	<b>Estimate</b>	<b>Percentage</b>
<b>Total:</b>	<b>110,255</b>	<b>100%</b>
<b>Speak only English</b>	<b>67,020</b>	<b>61%</b>
<b>Spanish</b>	<b>38,107</b>	<b>35%</b>
<b>Speak English "very well"</b>	<b>24,587</b>	<b>22%</b>
<b>Speak English less than "very well".</b>	<b>13,520</b>	<b>12%</b>

**Factor 2: Assessing Frequency of Contact with Persons with LEP.**

Vista's Senior Transportation program serves persons with LEP infrequently via its shuttle bus, lunch transportation, volunteer driver, and taxi scrip programs. On average, the City serves approximately 65 unduplicated clients each month; of which, less than 1% are LEP. Program staff indicate an average of two to three clients per month are referred to bilingual personnel for assistance. The transportation program has voice mail and staff responds the next business day to all messages.

**Factor 3: Assessing the Importance of the City of Vista's Services.**

The purpose of the City of Vista's Senior Transportation Program is to enhance the lives of homebound senior citizens by promoting independence and self-sufficiency, providing affordable and accessible transportation and reducing social isolation. There are currently approximately 300 seniors actively registered with the *Out & About Vista Senior* transportation program. New clients are added each week, and/or are transferred from the "inactive" list. The three-part program includes a Senior Shuttle Service, which provides door-to-door bus service, a Mileage Reimbursement component which utilizes volunteers in the community to provide transportation in privately owned vehicles, and a Taxi Voucher component filling the service gaps. This comprehensive approach supports group *and* individual trips for shopping, medical appointments, social activities and other errands within the city boundaries, as well as outside of the boundaries. The combination of solutions meets many different needs, while maximizing cost effectiveness and efficiency. For example, participants who might need a quick trip to the pharmacy on a Saturday evening would have access to the taxi voucher service. Participants who require more assistance can take advantage of the shuttle or volunteer driver program where they are not left unattended with their valuables and are escorted to their residence to ensure a safe entry into their home. Without this service, these individuals have a difficult time finding satisfactory transportation. *Out & About Vista* is in its seventeenth year of operation and is currently the only program providing this type of service for elderly residents in Vista. Additional benefits provided include additional insurance for volunteer drivers, a convenient office location at the Gloria E. McClellan Center, driver training workshops, and in-kind support. In FY 2018-2019, *Out & About* provided to seniors 12,026 low cost one-way trips. This was the last full year of operation prior to the COVID-19 pandemic. After resuming services, the *Out & About* program is averaging approximately 7,500 one way trips annually as of June, 2023, with participation continuing to increase.

The City of Vista provides transportation for seniors to and from the McClellan Center to participate in the City's Senior Nutrition Program. This transportation is provided to Vista residents for a suggested contribution of \$1.00 per roundtrip. The transportation service is a component of the Senior Nutrition lunch program. Nutrition Program Transportation Service is available Monday through Friday from the participant's residence to the McClellan Center and back. Without this service, these participants would not enjoy the benefits of the nutrition program, socialization, and access to numerous additional services provided at the McClellan Center.

**Factor 4: Determining Available Resources.**

The City of Vista's Senior Transportation Program currently provides information in Spanish for rider applications and informational brochures. Many regular participants and volunteers are bilingual in Spanish and are available for translation services.

**Safe Harbor Provisions**

The Federal Department of Transportation has adopted the Department of Justice's Safe Harbor Provision, which outlines circumstances that can provide a "safe harbor" for Federal Funding recipients regarding translation of written materials for populations with LEP.

*"The 'Safe Harbor Provision' as defined by Department of Justice, stipulates that if a recipient provides written translation of vital documents 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 encountered, then such action will be considered strong evidence of compliance with the recipient's written translation obligations."*

For Vista, all language groups other than Spanish have estimated populations of less than 1,000 persons and are much less than 5% of the total population. Spanish exceeds the Safe Harbor Provision threshold. The Out & About rider application is the vital document for our program and is available in Spanish.

**Language Assistance Services**

While the agency does not currently have an on-going need for professional translation services, on-site agency staff who are fluent in Spanish provide translation services as needed. Additionally, bilingual in Spanish participants and volunteers are occasionally used to provide translation services. The City of Vista's Senior Transportation Program provides the following materials in Spanish; ride applications and informational brochures. If translation is needed for another language, the City currently utilizes OC Interpreting, an Oceanside-based translator, for interpretation and translation services. Interpretation services must be requested a minimum of 48 hours in advance. Staff then schedule interpretation services with the requesting individual during the City's regular operational hours, as posted on the City of Vista website ([www.cityofvista.com](http://www.cityofvista.com)). OC Interpreting provides translation services for over 150 languages. Their translation services include every common language and translations of many dialects from multilingual nations like India, the Philippines, and China. Upon request, the City provides additional language assistance measures including translation services at City Council and Town Hall meetings and sign language interpretation services.

**Communicating Availability of Language Assistance**

The City of Vista maintains a roster of staff that can provide translation in Spanish and several other languages. Senior transportation staff refer clients to bi-lingual employees for

translation services. If translation is needed for another language, staff are trained to utilize the Language Line.

Additionally, the City provides numerous documents in Spanish. Senior Transportation program related documents offered in Spanish include:

- Title VI Notice to the Public
- Title VI Complaint Form
- Title VI Complaint Procedures
- Agency website Title VI information
- Rider Applications
- Informational Brochures

### **Monitoring**

The City of Vista maintains an ADA/Section 504 Accessibility Plan, designed to minimize barriers created by architectural factors, environmental factors, employment barriers, and communication barriers such as language. This plan is reviewed and updated, if necessary, bi-annually.

Additionally, the City of Vista maintains a Limited English Proficiency (LEP) plan, which is updated bi-annually by Human Resources staff. The plan is reviewed periodically for accuracy, compliance with regulations, and to ensure any necessary updates are incorporated. The City continually evaluates LEP persons served and ensures translation services are made available to individuals who request them. The City provides additional language assistance measures (including interpretation of over 150 languages through a translation service, and sign language interpretation upon request).

Satisfaction Surveys for the *Out & About* program offer an opportunity for consumers to provide input or suggest additional services. Satisfaction surveys are distributed in both English and Spanish

### **Training**

All City staff are trained to utilize the list of bilingual employees when oral Spanish translation services are needed. Instructions for use are included on the bilingual roster that is distributed each time it is updated. Senior Transportation Program staff are specially trained to refer participants in need to translation service to either program staff, other bilingual staff at the Senior Center or to utilize bilingual Senior Center participant's and/or volunteers. Staff are trained to utilize the Language Line if translation is needed for another language.

## **Membership of Non-Elected Committees and Councils**

City of Vista does not have a non-elected transit related advisory council at this time.

## **Title VI Equity Analysis**

City of Vista does not have transit related facilities.

**RESOLUTION NO. 2023-132**

**A RESOLUTION OF THE CITY COUNCIL OF THE CHARTERED CITY OF VISTA, CALIFORNIA, UPDATING THE TITLE VI COMPLIANCE PROGRAM**

**The City Council of the City of Vista does resolve as follows:**

**1. Findings.** The City Council hereby finds and declares the following:

A. Under Title VI of the Civil Rights Act of 1964, the City is required to ensure reasonable accessibility to services and to prohibit discrimination in employment, programs, and activities.

B. The City, as a recipient of federal financial assistance under Title VI of the Civil Rights Act of 1964 ensures that no person shall on the grounds of race, religion, color, national origin, sex, age or disability be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any City programs or activities.

**2. Action.**

A. The updated Title VI Compliance Program is approved for implementation and distribution.

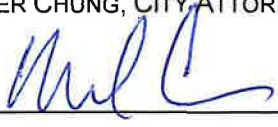
**3. Adoption.** PASSED AND ADOPTED at a meeting of the City Council of the City of Vista held on August 8, 2023, by the following vote:

AYES: Mayor Franklin, Green, Contreras, Melendez, O'Donnell

NOES: None

ABSTAIN: None


APPROVED AS TO FORM:  
WALTER CHUNG, CITY ATTORNEY

By:  \_\_\_\_\_

APPROVED  
Walter C. Chung  
20230720103632

  
\_\_\_\_\_  
JOHN B. FRANKLIN, MAYOR

ATTEST:  
KATHY VALDEZ, CITY CLERK

By:  \_\_\_\_\_