ACCESS SERVICES
LOS ANGELES COUNTY

TITLE VI REPORT

OCTOBER 2019 - SEPTEMBER 2022
I. Introduction

This document was prepared pursuant to FTA Circular 4702.1B Title VI Requirements and Guidelines for Federal Transit Administration Recipients and reflects the policies of Access Services.

Access Services is a state mandated local public agency created by Los Angeles County’s public transit agencies to administer and manage the delivery of complementary Americans with Disabilities Act (ADA) paratransit service and to coordinate human service transportation agencies as the Consolidated Transportation Services Agency (CTSA). Currently there are forty-five (45) public transit operators serving Los Angeles County that are the member agencies and formal stakeholders of Access Services. The members are listed under Appendix A. Access Services is a public agency within the meanings of the California Fair Political Practices Act and the California Open Meetings and Records Act (Brown Act).

Access Services is governed by a nine-member Board of Directors with directors appointed by the following organizations:

- The County of Los Angeles Board of Supervisors
- City Selection Committee’s Corridor Transportation Representatives
- Office of the Mayor of the City of Los Angeles
- Governing boards of the municipal fixed-route operators
- Governing boards of the local fixed-route operators
- Los Angeles County Commission on Disabilities
- Los Angeles County Independent Living Centers
- Los Angeles Metro staff
- Local fixed-route operators and municipal fixed-route operators (rotating appointment)

The Board has created two advisory committees, the Community Advisory Committee (CAC) and Transportation Professionals Advisory Committee (TPAC). Both CAC and TPAC have 15 voting members. The Chairperson positions of CAC and TPAC serve as ex-officio members of the Board of Directors.

Access Services executive management team is comprised of an Executive Director, Deputy Executive Directors and the directors or managers of the following departments: Administration, Customer Relations, Eligibility, Finance, Fleet Design,
Information Technology, Government Affairs and Outreach, Operations, Planning, Procurement and Contract Administration, and Training and Development. Access currently employs seventy-one (71) individuals. An organization chart presenting the variety of positions and departments operated by Access Services is included in Appendix B. Paratransit dispatch and transportation operations are operated by several contractors (service providers) and eligibility determination services are provided by one contractor. Access Services staff manage the paratransit and eligibility contracts.

II. General Title VI Requirements and Guidelines for Providers of Paratransit Services

The Title VI requirements that Access Services must follow are contained in Chapter III (General Requirements and Guidelines) of FTA Circular 4702.1B.

Access Services’ Title VI requirements are not spelled out in Chapter IV – Requirements and Guidelines for Fixed Route Transit Providers as Access service is exclusively paratransit (demand-response) service with no Fixed Route service. As stated in Chapter IV of the Circular “Providers of public transportation that only operated demand response service are responsible only for the requirements in Chapter III. Demand response includes general public paratransit, Americans with Disabilities Act complementary paratransit, vanpools and Section 5310 non-profits that serve only their own clientele (closed door service).”

Access is responsible to produce certain documents/reports to demonstrate their compliance with Title VI. As contained in Chapter III, section 2 “In accordance with 49 CFR Section 21.7(a), every application for financial assistance from FTA must be accompanied by an assurance that the applicant will carry out the program in compliance with DOT’s Title VI regulations.” Further, contained in Chapter III, section 4, “FTA requires that all direct and primary recipients document their compliance with DOT’s Title VI regulations by submitting a Title VI Program to their FTA regional Civil rights officer once every three years or as otherwise directed by FTA.”

Following the guidance of Chapter III of FTA Circular 4702.1B, there are a series of requirements that Access must meet:

1) Title VI Program must be approved by Access’ Board of Directors;

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1 Employment data used in the Utilization Analysis of this report draws from employment data gathered in September 2016.
Following the guidance of Chapter III of FTA Circular 4702.1B, there are a series of requirements that Access must meet:

1) Title VI Program must be approved by Access’ Board of Directors;
2) Requirement to Notify Public of Protection Under Title VI;
3) Requirement to Develop Title VI Complaint Procedures and Complaint Form;
4) Requirement to Record and Report Transit-Related Title VI Investigations, Complaints and Lawsuits;
5) Requirement to Promote Public Participation (Develop a Public Participation Plan);
6) Requirement to Provide Meaningful Access to Limited English Proficiency (LEP) Persons;
7) Requirement to Have Minority Representation on Access’ Board of Directors and Advisory Boards(Committees); and
8) Requirement to Monitor Subrecipients (Contractors) Title VI Compliance;

A. **Title VI Approval by Access’ Board of Directors**

As contained in FTA Circular 4702.1B, Chapter III, section 4, FTA requires that “the Title VI Program must be approved by the recipient’s (Access’) Board of Directors . . . .”

Access must “submit a copy of the board resolution, meeting minutes or similar documentation with the Title VI Program as evidence that the board of directors . . . has approved the Title VI Program.”

Access’ Title VI Program and associated Title VI reports will be brought before the Access Services Board of Directors on Monday, October 21st. Contained in **Appendix C** of this report is a copy of the Board of Directors agenda. **Appendix D** will provide a copy of the minutes from the Board of Directors meeting showing the approval of this Title VI Program.

B. **Requirement to Notify Customers of Protection under Title VI**

As per guidance in FTA Circular 4702.1B, Chapter III, Section 4, recipients are required “to provide information to the public regarding the recipient’s obligations under DOT’s Title VI regulations and apprise members of the
1. **Access Services Website**
   Access provides information about its commitment to Title VI non-discrimination rules on its website at the following location:

   [http://accessla.org/about_us/title_vi.html](http://accessla.org/about_us/title_vi.html)

   A printed copy of these pages is contained in **Appendix E**.

   Included in the narrative is the statement that Access is “committed to providing services without regard to race, color or national origin.” There are also instructions provided where a person may go to request additional information about Access’ Title VI policies and practices. Finally, if a person wishes to file a Title VI complaint there is a link to Access’ Title VI Complaint Form – a copy of which is included in **Appendix F** – and instructions as to how to file a Title VI complaint with Access and Access’ Title VI complaint process.

2. **Access Services Customer Rider’s Guide**
   Each of Access’ eligible customers receives a copy of a Rider’s Guide which provides guidance as to how to effectively utilize paratransit service in Los Angeles County. Contained in the Rider’s Guide is one page dedicated to Access’ Title VI commitment. A copy of the text of this page from the Rider’s Guide is contained in **Appendix G**.

   Similar to what is contained on Access’ website, the text included in the Rider’s Guide also states that Access Services is “committed to providing services without regard to race, color or national origin.” The Rider’s Guide also directs customers as to how to request more information about Access’ Title VI nondiscrimination requirements and the means as to how to file a Title VI complaint.

   By including Access’ Title VI information in its Rider’s Guide, is the most effective means to reach all of the agency’s customers. All Access customers who may make use of Access paratransit service receive a copy of the Rider’s Guide, whereas Access does not have any bus shelters or stations where Title VI policies could be posted. Also, although Access does have contractors operate its fleet of minivans, during peak times, Access contracts with independent taxi providers. In-vehicle postings would be a less effective means of reaching our customer population.
3. **Posting of Title VI Policy in Public Spaces**
   Access currently posts its Title VI Policy Access’ “public” spaces, this includes the reception area of its administrative offices in El Monte, California and at its Eligibility Center.

   A copy of the posted policy statement is contained in Appendix H.

4. **Translation of Title VI Policy into Non-English Languages**
   Access’ Rider’s Guide is available in English and in Spanish, as per Access’ Limited English Proficiency (LEP) Plan. Access’ website has an internal link to the on-line Google Translate service, so information posted on Access’ website can be reviewed in over 70 different languages through Google Translate and the Title VI information is also available for translation for members of the public who do not read English.

C. **Requirement to Develop Title VI Complaint Procedures and Complaint Form**

   FTA Circular 4702.1B Chapter III, Section 6 requires that Access Services “develop procedures for investigating and tracking Title VI complaints filed against [the agency] and make [the] procedures for filing a complaint available to members of the public.”

1. **Title VI Complaint Form**
   Access developed a Title VI complaint form, which is available to the public (as presented in Access’ Title VI procedures above) either by telephoning or mailing Access Services or by accessing the Complaint Form in the Title VI section of Access’ website. A copy of Access’ current Title VI Complaint Form is available for review in Appendix F.

   The Title VI Complaint Form contains spaces where a customer may fill out all of the information necessary for Access’ Complaints Division to conduct an investigation and allows the customer an opportunity to provide a narrative description of his or her experience that is prompting the complaint.

2. **Title VI Complaint Investigations**
   Part of Access’ Customer Service staff is dedicated to investigating and responding to complaints. Once a Title VI complaint is received, the Complaints Division will
gather the facts associated with the complaint and conduct an investigation on the matter.

As an added step involved in the handling of Title VI complaints, when Title VI complaints are received, copies of these complaints are sent to the Planning and Human Resources Department. The Human Resources Department is to receive copies of all Title VI complaints, while the Planning Department conducts oversight of the complaint investigation process.

The Planning Department will review all Title VI complaints received and also review the investigations conducted by the Complaints Division to ensure that the matter has been resolved effectively.

The Planning Department also tracks the number of Title VI complaints that are received by the agency so as to report such information to the FTA and also to determine if there are possible patterns of behavior occurring in Access’ service area which is to be prohibited by Title VI protections.

3. **Title VI Complaint Investigation Procedure**

When a Title VI complaint is received by Access, this initiates an extensive investigatory process to both respond to the customer’s concern as well as to understand the severity (if any) of possible Title VI violations.

   a. Any person who believes that he or she, individually, as a member of any specific class, or in connection with any disadvantaged business enterprise, has been subjected to discrimination prohibited by Title VI of the Civil Rights Act of 1964, the Americans with Disabilities Act of 1990, Section 504 of the Vocational Rehabilitation Act of 1973 and the Civil Rights Restoration Act of 1987, as amended, may file a complaint with Access Services. A complaint may also be filed by a representative on behalf of such a person. All complaints will be referred to the Human Resources Manager for review and action.
   
   b. In order to have the complaint considered under this procedure, the complainant must file the complaint no later than 180 days after:
      
      a. The date of alleged act of discrimination; or
b. Where there has been a continuing course of conduct, the date on which the conduct was discontinued

In either case, Access Services may extend the time for filing or waive the time limit in the interest of justice, as long as Access Services specifies in writing the reason for so doing.

c. Complaints shall be in writing and shall be signed by the complainant and/or the complainant’s representative. Complaints shall set forth as fully as possible the facts and circumstances surrounding the alleged discrimination. In the event that a person makes a verbal complaint of discrimination to an officer or employee of Access Services, the person shall be interviewed by the Human Resources Manager. If necessary, the Human Resources Manager will assist the person in reducing the complaint to writing and submit the written version of the complaint to the person for signature. The complaint shall then be handled according to Access Services’ investigative Procedures.

d. Within 10 days, the Customer Relations department will acknowledge receipt of the allegation, inform the complainant of action taken or proposed action to process the allegation and to advice the complainant of other avenues of redress available, such as the Federal Transit Administration (FTA).

e. Upon request by FTA, Access can advise FTA of the details associated or alleged in the complaint. Generally, the following information will be included in every notification to the FTA:
   a. Name, address and phone number of the complainant.
   b. Name(s) and address(es) of alleged discriminating official(s)
   c. Basis of complaint (i.e. race, color, national origin or sex)
   d. Date of alleged discriminatory act(s)
   e. Date of complaint received by the recipient
   f. A statement of the complaint
   g. Other agencies (state, local or Federal) where the complaint has been filed
   h. An explanation of the actions Access Services has taken or proposed to resolve the issue in the complaint.

f. Within 60 days, the Customer Relations department will conduct an investigation of the allegation and based on the information obtained, will render a recommendation for action in a report of findings to the Executive Director. The complaint should be resolved by informal means wherever
possible. Such informal attempts and their results will be summarized in the report findings.

g. Within 90 days of receipt of the complaint, the Executive Director will notify the complainant in writing of the final decision reached, including the proposed disposition of the matter. The notification will advise the complainant of his/her appeal rights with the FTA, if they are dissuaded with the final decision rendered by Access Services. If sought by the FTA, the Human Resources Manager will provide the FTA with a copy of the decision and summary of findings upon completion of the investigation.

h. Contacts for the different Title VI administrative jurisdictions are as follows:
   Federal Transit Administration, Office of Civil Rights
   Attention: Title VI Program Coordinator
   East Building, 5th Floor – TCR
   1200 New Jersey Avenue, S.E.
   Washington D.C. 20590

D. Requirement to Record and Report Transit-Related Title VI Investigations, Complaints and Lawsuits

FTA Circular 4702.1B, Chapter III, Section 7 states that a recipient of Federal assistance must “prepare and maintain a list of any of the following that allege discrimination on the basis of race, color or national origin: Active investigations conducted by entities other than the FTA; lawsuits and complaints naming the recipient. This list shall include the date that the investigation, lawsuit or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by the recipient in response or final findings related to the investigation, lawsuit or complaint. This list shall be included in the Title VI Program submitted to FTA every three years.”

In addition to performing full investigations on Title VI complaints as Access’ Complaints Division performs on all complaints received against Access, the following added steps have been included to ensure proper tracking of such complaints:

“All Title VI complaints will be addressed to the Human Resources Department to confirm receipt. The complaint will then be entered by an assigned Customer Care Specialist. An e-mail notification will automatically be generated and addressed to Government Services, the Project Administrators and the
Customer Care Department. Within 60 days, an investigation of the allegation will be conducted and based on the information obtained; the Customer Care Department will render a recommendation for action in a report of findings to the Executive Director. Within 90 days of receipt of the complaint, the Executive Director will notify the complainant in writing of the final decision reached, including the disposition of the matter.” (Customer Care policies, September, 2013).

In the past three years, Access has received a total of two (2) complaints that alleged Title VI issues. The table included in Appendix I summarizes the complaints that were filed and their resolution.

E. **Promoting Inclusive Public Participation**

FTA Circular 4702.1B, Chapter III, Section 8 sets forth that each recipient must establish a “public participation plan or process (i.e. a document that explicitly describes the proactive strategies, procedures, and desired outcomes that underpin the recipient’s public participation activities).”

Access is committed to reaching out to its customers to both receive input from our customers about Access’ service and also to educate our customers about changes taking place with Access’ paratransit operations.

To fully capture the extensive public engagement efforts that Access has pursued, the agency has created a separate Public Participation Plan document. This Public Participation Plan has been attached to this document as Appendix J.

F. **Requirement to Provide Meaningful Access to LEP (Limited English Proficiency) Persons**

FTA Circular 4702.1B, Chapter III, Section 9 encourages recipients to “take reasonable steps to ensure meaningful access to benefits, services, information and other important portions of their programs and activities for individuals who are limited-English proficient (LEP).”

To comply with FTA Circular 4702.1B and Executive Order 13166 “Improving Access to Services for Persons with Limited English Proficiency,” Access has introduced a number
of processes to ensure that individuals are able to effectively access the paratransit resources that Access offers the Los Angeles County community.

As there have been extensive efforts undertaken by Access and for the purpose of providing a thorough analysis of the required four-factor analysis, Access has created a separate Limited English Proficiency Plan. Access' Limited English Proficiency Plan has been attached to this document as Appendix K.

G. Minority Representation on Planning and Advisory Bodies

FTA Circular 4702.1B, Chapter III, Section 10 states that “a recipient may not, on the grounds of race, color or national origin, ‘deny a person the opportunity to participate as a member of a planning, advisory, or similar body which is an integral part of the program.’ Recipients that have transit-related, non-elected planning boards, advisory councils or committees, or similar committees, the membership of which is selected by the recipient, must provide a table depicting the racial breakdown of the membership of those committees and a description of efforts made to encourage the participation of minorities on such committees.”

Table 1 is based off of the table contained in FTA Circular 4702.1B and presents the percent minority and non-minority of the members of Access’ three governing bodies, our Board of Directors, Community Advisory Committee (CAC) and Transportation Professionals Advisory Committee. Due to some CAC members having stepped down over the past months from their role in the Committee, there are fewer than fifteen voting members currently on that committee.

As demonstrated in Table 1, Access has minority representation on each of its governing bodies, which is a reflection of the Los Angeles County community which Access serves.

Access employs a variety of methods to encourage persons active in the paratransit, transit and disability communities to apply for positions on Access' governing bodies. Below are the means used to encourage individuals to volunteer for our governing bodies and how those means also encourage minority representation on the Board and advisory committees.
<table>
<thead>
<tr>
<th>Governing Body</th>
<th>Total Members &amp; TPAC Alternates</th>
<th>Percent White</th>
<th>Percent Latino</th>
<th>Percent African-American</th>
<th>Percent Asian-American</th>
<th>Percent Two or More Races</th>
</tr>
</thead>
<tbody>
<tr>
<td>Access Services Board of Directors</td>
<td>9</td>
<td>55.56%</td>
<td>0.00%</td>
<td>22.22%</td>
<td>22.22%</td>
<td>0.00%</td>
</tr>
<tr>
<td>Community Advisory Committee (CAC)*</td>
<td>15</td>
<td>40.00%</td>
<td>20.00%</td>
<td>6.67%</td>
<td>6.67%</td>
<td>13.33%</td>
</tr>
<tr>
<td>Transportation Professionals Advisory Committee (TPAC)*</td>
<td>25</td>
<td>12.00%</td>
<td>36.00%</td>
<td>24.00%</td>
<td>8.00%</td>
<td>0.00%</td>
</tr>
</tbody>
</table>
1. **Access Services Board of Directors**

   The selection process for Access’ Board members is performed apart from Access Services. Access works with the below County-wide/local organizations to have the most qualified representatives on Access’ Board representing the interests of Access and its customers.

   When a vacancy is approaching for the Board, Access will inform the appointing body of the upcoming vacancy and that agency will begin a selection process, out of Access’ influence, to determine the most qualified person to fill the vacancy position.

   Below are the different County-wide/local bodies which appoint one person to Access’ Board of Directors.

   - The County of Los Angeles Board of Supervisors
   - City Selection Committee’s Corridor Transportation Representatives
   - Mayor of the City of Los Angeles
   - Governing boards of the municipal fixed-route operators
   - Governing boards of the local fixed-route operators
   - Los Angeles County Commission on Disabilities
   - Los Angeles County Independent Living Centers
   - Los Angeles Metro staff
   - Local fixed-route operators and municipal fixed-route operators (rotating appointment)

2. **Community Advisory Committee (CAC)**

   As contained in the CAC Bylaws, diverse representation is encouraged as an element in selecting voting representatives to the committee.

   “The Access Services Board of Directors shall appoint a slate of fifteen (15) Los Angeles County residents comprised of persons with disabilities or, where needed, persons with knowledge of specific disabilities to the CAC following receipt of an application for CAC membership and a personal interview with by the Access Services staff liaison. Representatives shall be appointed to ensure that the committee reflects both diversity across various types of disabilities and regional diversity across the geographic area being served by Access Paratransit.” (CAC Bylaws, Page 1).
3. **Transportation Professionals Advisory Committee (TPAC)**

   Access’ TPAC draws its membership from across Los Angeles County and surrounding counties, seeking professionals with very diverse backgrounds in the fields of transit, paratransit and social service. The TPAC Bylaws present how members are selected for the committee.

   “The Committee consists of 15 voting members [plus alternates (currently 25 total voting members and alternates)] comprised of transit, paratransit and social service transportation professionals representing all regions of Los Angeles and surrounding counties. Members are approved by the Access Services Board of Directors according to criteria that ensures the committee represents the public transportation community. . . .”

   “Applications to TPAC membership are submitted to [Access] staff for review. A membership subcommittee comprising of two to three TPAC committee members will review and consider the application and may forward to the Board for approval.” (TPAC Bylaws, Page 1)

H. **Requirement to Monitor Subrecipients**

   Access Services does not oversee any subrecipients of Federal funds. Access, however, does maintain contracts with different private transportation providers to perform the transportation and eligibility functions of Access’ services. These contractual relationships do not require separate Title VI documents to be prepared by the different providers of services, but it does require that Access thoroughly investigate any Title VI complaints brought against their drivers or staff as if it were brought against Access itself.

   All complaints of Access’ different service providers are routed through Access Services’ Complaints Division. Any Title VI complaints that are received against a service provider of Access Services would receive the same scrutiny as though it were filed against Access Services itself.

   For a review of Access’ Title VI complaints investigation procedures, please refer to Section C, 2 of this Title VI Program report.
APPENDIX A
ACCESS SERVICES
MEMBER AGENCY LIST
Access Services Member Agencies

1. Antelope Valley Transit Authority
2. Beach Cities Transit
3. City of Alhambra
4. City of Arcadia
5. City of Baldwin Park
6. City of Bell
7. City of Bell Gardens
8. City of Bellflower
9. City of Burbank
10. City of Calabasas
11. City of Carson
12. City of Cerritos
13. City of Commerce
14. City of Compton
15. City of Cudahy
16. City of Downey
17. City of Duarte
18. City of El Monte
19. City of Glendale
20. City of Huntington Park
21. City of Inglewood
22. City of La Canada Flintridge
23. City of Lawndale
24. City of Lynwood
25. City of Monterey Park
26. City of Paramount
27. City of Pasadena
28. City of Rosemead
29. City of Sierra Madre
30. City of West Covina
31. City of West Hollywood
32. City of Westlake Village
33. Culver CityBus
34. Foothill Transit
35. Gardena Municipal Bus Lines (GTrans)
36. Long Beach Transit
37. Los Angeles Department of Transportation (LADOT)
38. Los Angeles County Department of Public Works
39. Los Angeles County Metropolitan Transportation Authority (Metro)
40. Montebello Bus Lines
41. Norwalk Transit
42. Palos Verdes Peninsula Transit Authority
43. Santa Clarita Transit
44. Santa Monica’s Big Blue Bus
45. Torrance Transit
Access Services - FTE Summary

Executive Director
1 FTE

Administration & Eligibility
11 FTE

Planning
6 FTE

Deputy Executive Director
1 FTE

Government Affairs and Outreach
11 FTE

Operations
21 FTE

Information Technology
7 FTE

Finance
13 FTE
Access Services – Administration

- Director, Administration 1 FTE
  - Receptionist 1 FTE
  - Office Services Clerk 1 FTE
  - Administrative Assistant 1 FTE
  - Human Resources Administrator 1 FTE
    - Manager Eligibility 1 FTE
      - Eligibility Coordinator 3 FTE
      - Compliance Specialist 1 FTE
    - Project Administrator 1 FTE
Access Services – Planning

Director, Planning & Coordination
1 FTE

Manager Training & Development
1 FTE

CTSA Analyst
1 FTE

Transportation Planner
1 FTE

Communications Coordinator
1 FTE

Strategic Planner
1 FTE
Access Services – Government Relations

Manager Government Affairs & Outreach
1 FTE

Customer Relations Administrator
1 FTE

Senior Mobility Management Counselor
1 FTE

Community Liaison
1 FTE

ADA Coordinator
1 FTE

Customer Relations Advocate
1 FTE

Administrative Assistant
1 FTE

Customer Relations Associate
4 FTE
Access Services - Operations

Chief Operations Officer
1 FTE

Manager Operations
1 FTE

Senior Mgr Fleet Design & Maintenance
1 FTE

Project Administrator
4 FTE

Safety Analyst
1 FTE

Operations Service Monitor
5 FTE

Fleet Maintenance Analyst
2 FTE

Senior Road Safety Inspector
1 FTE

Road Safety Inspector
4 FTE

Emergency Management Coordinator
1 FTE
Access Services - Information Technology

Director
Information Technology
1 FTE

Senior Data Architect
1 FTE

Application Developer
1 FTE

Business Analyst
1 FTE

GIS Data Analyst
1 FTE

Systems Administrator
1 FTE

Network & Help Desk Administrator
1 FTE
Access Services - Finance

Finance

Senior Manager 
Financial Planning
1 FTE

Accounting 
Supervisor
1 FTE

Senior Accountant
2 FTE

Manager 
Procurement & Contract Admin.
1 FTE

Assistant 
Procurement Specialist
2 FTE

Risk 
Management Coordinator
1 FTE

Risk 
Management Analyst
1 FTE

Accountant
2 FTE

Senior Auditor
1 FTE

Procurement/ 
Contracts Administrator
1 FTE
APPENDIX C
ACCESS SERVICES
BOARD OF DIRECTORS AGENDA
OCTOBER 21, 2019
APPENDIX D
ACCESS SERVICES
BOARD OF DIRECTORS
OCTOBER 21, 2019 MINUTES
APPENDIX E

TITLE VI INFORMATION CONTAINED ON ACCESS SERVICES’ WEBSITE

WWW.ACCESSLA.ORG
Access Services complies with the requirements of Title VI of the Civil Rights Act of 1964, the American with Disabilities Act of 1990, Section 504 of the Vocational Rehabilitation Act of 1973, and the Civil Rights Restoration Act of 1987. Access Services is committed to providing services without regard to race, color or national origin.

If you would like additional information on Access Services' nondiscrimination requirements, please contact Access Services at 213-270-6000 or in writing at:

Access Services  
Human Resources Manager  
P.O. Box 5728  
El Monte, CA 91734  
Email address: hr@accessla.org

To view a copy of the complaint form: TITLE VI COMPLAINT FORM-ENGLISH / TITLE VI COMPLAINT FORM-Spanish

If you would like to file a discrimination complaint against Access and/or its contractors, the complaint must be filed within 180 days. Please follow the procedures listed below in Access Services Discrimination Complaint Procedure.

**Access Services Discrimination Complaint Procedure**

1. Any person who believes that he or she, individually, as a member of any specific class, or in connection with any disadvantaged business enterprise, has been subjected to discrimination prohibited by Title VI of the Civil Rights Act of 1964, the American with Disabilities Act of 1990, Section 504 of the Vocational Rehabilitation Act of 1973 and the Civil Rights Restoration Act of 1987, as amended, may file a complaint with Access Services. A complaint may also be filed by a representative on behalf of such a person. All complaints will be referred to the Human Resources Manager for review and action.

2. In order to have the complaint considered under this procedure, the complainant must file the complaint no later than 180 days after:
   a. The date of alleged act of discrimination; or
   b. Where there has been a continuing course of conduct, the date on which that conduct was discontinued.

   In either case, Access Services may extend the time for filing or waive the time limit in the interest of justice, as long Access Services specifies in writing the reason for so doing.

3. Complaints shall be in writing and shall be signed by the complainant and/or the complainant's representative. Complaints shall set forth as fully as possible the facts and circumstances surrounding the alleged discrimination. In the event that a person makes a verbal complaint of discrimination to an officer or employee of Access Services, the person shall be interviewed by the Human Resources Manager. If necessary, the Human Resources Manager will assist the person in reducing the complaint to writing and submit the written version of the complaint to the person for signature. The complaint shall then be handled according to Access Services' investigative procedures.
4. Within 10 days, the Customer Support Center will acknowledge receipt of the allegation, inform the complainant of action taken or proposed action to process the allegation, and advise the complainant of other avenues of redress available, such as the Federal Transit Administration (FTA).

5. Upon request by FTA, Access can advise FTA of the details associated alleged in the complaint. Generally, the following information will be included in every notification to the FTA:
   a) Name, address, and phone number of the complainant.
   b) Name(s) and address(es) of alleged discriminating official(s).
   c) Basis of complaint (i.e., race, color, national origin or sex)
   d) Date of alleged discriminatory act(s).
   e) Date of complaint received by the recipient.
   f) A statement of the complaint.
   g) Other agencies (state, local or Federal) where the complaint has been filed.
   h) An explanation of the actions Access Services has taken or proposed to resolve the issue in the complaint.

6. Within 60 days, the Customer Support Center will conduct an investigation of the allegation and based on the information obtained, will render a recommendation for action in a report of findings to the Executive Director. The complaint should be resolved by informal means whenever possible. Such informal attempts and their results will be summarized in the report of findings.

7. Within 90 days of receipt of the complaint, the Executive Director will notify the complainant in writing of the final decision reached, including the proposed disposition of the matter. The notification will advise the complainant of his/her appeal rights with the FTA, if they are dissatisfied with the final decision rendered by Access Services. The Human Resources Manager will also provide the FTA with a copy of this decision and summary of findings upon completion of the investigation.

8. Contacts for the different Title VI administrative jurisdictions are as follows:
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

Access Services promotes access to all modes of transportation and provides quality and safe ADA paratransit service on behalf of public transit agencies in Los Angeles County

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APPENDIX F
ACCESS SERVICES
TITLE VI COMPLAINT FORM
ACCESS SERVICES
TITLE VI COMPLAINT FORM

Access Services is committed to ensuring that no person is excluded from participation in or denied the benefits of its services on the basis of race, color or national origin, as provided by Title VI of the Civil Rights Act of 1964, as amended. Title VI complaints must be filed within 180 days from the date of the alleged discrimination.

The following information is necessary to assist us in processing your complaint. If you require any assistance in completing this form, please contact Access Services’ Human Resources Manager by calling (213) 270-6000. The completed form must be mailed or delivered to:

Access Services
Human Resources Manager
P.O. Box 5728
El Monte, CA 91734

1. Personal Information

Access Services Customer ID Number

<table>
<thead>
<tr>
<th>Last Name</th>
<th>First Name</th>
<th>Middle Initial</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Home street address</th>
<th>City</th>
<th>State</th>
<th>Zip Code</th>
</tr>
</thead>
<tbody>
<tr>
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</table>

<table>
<thead>
<tr>
<th>Home phone number</th>
<th>Alternate phone number</th>
</tr>
</thead>
<tbody>
<tr>
<td>( )</td>
<td>( )</td>
</tr>
</tbody>
</table>

Name(s):
Person(s) discriminated against (if someone other than complainant):

<table>
<thead>
<tr>
<th>Street address</th>
<th>City</th>
<th>State</th>
<th>Zip Code</th>
</tr>
</thead>
</table>

2. Alleged Discrimination Information

Date of Incident
Location of Incident

Which of the following best describes the reason the alleged discrimination took place? (Circle one)

-- Race

-- Color

-- National Origin (example: Limited English Proficiency)
Please describe the alleged discrimination incident. Provide the names and title of all Access Services employees involved if available. Explain what happened and who you believe was responsible. Please use the back of this form if additional space is required.
ACCESS SERVICES
TITLE VI FORM Solicitud de Quejas

Access Services se ha comprometido a garantizar que ninguna persona sea excluida de participar en, o negado los beneficios de sus servicios sobre la base de raza, color u origen nacional, conforme a lo dispuesto por el Título VI de los derechos Civiles del Acta de 1964, según enmendada. Quejas del Título VI deben ser presentadas dentro de 180 días después de la fecha de la supuesta discriminación.

La siguiente información es necesaria para ayudarnos a procesar su queja. Si necesita ayuda para completar este formulario, por favor pongase en contacto con Recursos Humanos de Access Services llamando al (213) 270-6000. El formulario completo debe enviarse por correo, fax o entregarlo a:

Access Services
Director de Recursos Humanos
P.O. Box 5728
El Monte, CA 91734
Fax: (213) 270-6055

1. Información Personal

<table>
<thead>
<tr>
<th>Access Services Número de ID Cliente</th>
</tr>
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<tbody>
<tr>
<td></td>
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</table>

<table>
<thead>
<tr>
<th>Apellido</th>
<th>Nombre</th>
<th>Segundo Nombre</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Dirección</th>
<th>Cuidad</th>
<th>Estado</th>
<th>Código Postal</th>
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</thead>
<tbody>
<tr>
<td>Número telefónico</td>
<td>Número telefónico alternativo</td>
</tr>
</tbody>
</table>

Nombre(s):
Persona(s) discriminado (si es alguien que no sea el acusador que dio esta queja):

2. Supuesta Información de Discriminación

<table>
<thead>
<tr>
<th>Fecha de Incidente</th>
<th>Lugar del Incidente</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

¿Cuál de las siguientes opciones describe mejor la razón por la supuesta discriminación que ocurrió? (Marque uno)
3. **Descripción del Incidente**

Por favor describa el supuesto incidente de discriminación. Proporcione los nombres y títulos de todos los empleados de Access Services involucrados si los tiene disponible. Explique los que ocurrió y quien cree usted que es el responsable. Por favor, use la parte de atrás de este formulario si necesita más espacio.

Completar el reverso del formulario

Firma

Fecha
APPENDIX G
ACCESS SERVICES
TITLE VI LANGUAGE FROM RIDER’S GUIDE
Access Services
PO Box 5728
El Monte, CA 91734
accessla.org

Policies effective January 1, 2019

Access Rider's Guide
Access Services complies with the requirements of Title VI of the Civil Rights Act of 1964, the Americans with Disabilities Act of 1990, Section 504 of the Vocational Rehabilitation Act of 1973, and the Civil Rights Restoration Act of 1987. Access Services is committed to providing services without regard to race, color or national origin.

If you would like additional information on Access Services’ nondiscrimination requirements, please contact Access Services at 213.270.6000 or in writing at:

Access Services
Attn: Human Resources
PO Box 5728
El Monte, CA 91734
Email: cserv@accessla.org

If you would like to file a discrimination complaint against Access and/or its contractors, the complaint must be filed within 180 days of the incident. Please see Access’ website for our complaint procedures accessla.org/about_us/title_vi.html.
APPENDIX H

ACCESS SERVICES

TITLE VI POLICY STATEMENT FOR PUBLIC SPACES

(El Monte Offices & Eligibility Centers)
April 9, 2018

Access Services’
Title VI Policy

Access Services complies with the requirements of Title VI of the Civil Rights Act of 1964, the Americans with Disabilities Act of 1990, Section 504 of the Vocational Rehabilitation Act of 1987. Access Services is committed to providing services without regard to race, color or national origin.

If you would like additional information on Access Services’ nondiscrimination requirements, please contact Access Services at (213) 270-6000 (information is available in multiple languages) or please write or email:

Access Services
Human Resources Manager
P.O. Box 5728
El Monte, CA 91734

Email: cserv@accessla.org

If you would like to file a discrimination complaint against Access and/or its contractors, the complaint must be filed within 180 days. Please see our website at http://accessla.org/about_us/title_vi.html for our complaint procedures and a Title VI complaint form.
Abril 9, 2018

Access Services’
Póliza del Título VI


Si desea información adicional sobre los requisitos de no discriminación Access Services, póngase en contacto con Access Services al (213) 270-6000 (información está disponible en varios idiomas), o escríbanos o correo electrónico:

Access Services
Human Resources Manager
(Gerente de Recursos Humanos)
P.O. Box 5728
El Monte, CA 91734
Email: cserv@accessla.org

Si usted desea presentar una queja por discriminación contra Access y/o sus proveedores, la queja debe presentarse dentro de 180 días. Por favor visité nuestro sitio web en http://accessla.org/about_us/_title_vi.html para nuestros procedimientos de quejas y un formulario de queja del Título VI.
APPENDIX I
ACCESS SERVICES
TITLE VI COMPLAINT TRACKING TABLE
FOR COMPLAINTS ALLEGING TITLE VI VIOLATIONS
FROM OCTOBER 2016 TO JULY 2019
<table>
<thead>
<tr>
<th>Date Filed (Month/Day/Year)</th>
<th>Access Ticket Number</th>
<th>Access Contractor Involved</th>
<th>Access Rider I.D.</th>
<th>Summary of Facts (Basis of Complaint; Race, Color or National Origin)</th>
<th>Status</th>
<th>Action(s) Taken</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 5/18/2018</td>
<td>480135</td>
<td>MV-San Fernando Valley</td>
<td>833962</td>
<td>Rider states that the driver drove right past him without stopping and the trip was reported a &quot;No Show&quot;. The rider suffers from Parkinson's, progressive Supranuclear Palsy and cognitive decline. He was scheduled to take his medication at 2pm. By the vehicle not stopping he was unable to do this and this puts the rider at risk of having seizures. Although OMC did offer a rider for 350pm - this was extremely late.</td>
<td>Closed</td>
<td>Initial complaint received by phone on 12/6/2018 with two follow-up calls made to the customer for investigation purposes. However, leaving call back requests, the customer has not spoken to us. Hence, a letter (draft sent for approval) will be sent requesting that the customer make a Title VI complaint according to procedure using the form provided by mail to her. A copy of the Title VI procedures are also being sent to assist her. Once the form is received, a thorough investigation can be conducted by the Access Customer Relations Department. The finalized letter will be posted in the Documents section under the rider's profile. Addendum 2/5/2019: 60 days have past since this ticket was initially open. Having received no response to our letter, this ticket will now be closed. No further attempt will be made to contact the customer on this particular matter. received no response</td>
</tr>
<tr>
<td>2 12/6/2018</td>
<td>509913</td>
<td>GPI</td>
<td>311648</td>
<td>Rider left a voicemail w/E. Zambrano in H.R. - Rider feels her civil rights have been violated because of the color of her skin. In the voicemail Ms. McDonald states she's booked reservations and the drivers were no-shows to the appointment. She indicated this has happened to her more than once (Yesterday, September 2018, July 2018). She indicated the individuals booking her appointments fail to make the appointment because of the color of her skin.</td>
<td>Closed</td>
<td>This ticket (not a Title VI Discrimination issue because it does not meet the criteria listed on our website, was closed via Ticket #481123 when the customer did not request a response. In this ticket likewise, no response is requested. However, a letter educating the customer on several of our procedures is being sent, after translation, along with a Spanish Rider's Guide. Notification will be sent to Management regarding the Title VI matter.</td>
</tr>
</tbody>
</table>
APPENDIX J
ACCESS SERVICES
PUBLIC PARTICIPATION PLAN
ACCESS SERVICES
LOS ANGELES COUNTY

PUBLIC PARTICIPATION PLAN

OCTOBER 2019 - SEPTEMBER 2022
PUBLIC PARTICIPATION PLAN

I. Introduction

In accordance with Title VI of the Civil Rights Act of 1964, Executive Orders 12898 and 13166 and Federal Transit Administration (FTA) Circular 4702.1B, Access Services of Los Angeles County has developed this Public Participation Plan (PPP) to guide public involvement efforts and improve the ability of public involvement in Access Services’ decision making process by low-income, minority and Limited English Proficiency (LEP) communities.

Purpose

Access Services’ primary goal in developing this program is to ensure that all individuals who rely upon Access Services either as direct customers, family members, personal care assistants, care center or hospital staff, etc. are able to have a voice in the decision-making processes of Access Services’ projects and programs. It is also a goal of Access Services to ensure that individuals and communities who may have historically had difficulty participating in public decision-making are able to participate in future decision-making, including low-income, minority and Limited English Proficiency (LEP) communities. To this end, Access Services conducts various meetings and community outreach with the hope of empowering low income, minority, and LEP communities throughout Los Angeles County in playing an active role in Access Services planning process.

FTA Circular 4702.1B states that with respect to planning public involvement measures:

The content and considerations of Title VI, the Executive Order on LEP, and the DOT LEP Guidance shall be integrated into each recipient’s established public participation plan or process (i.e., the document that explicitly describes the proactive strategies, procedures, and desired outcomes that underpin the recipient public participation activities). Recipients have wide latitude to determine how, when, and how often specific public participation activities should take place, and which specific measures are most appropriate.

Recipients of Federal funding should make determinations based on the composition of the population affected by the recipient’s actions, the type of public involvement process planned by the recipient and the resources available
to the agency. Efforts to involve minority and low-income people in public involvement activities can include both comprehensive measures, such as placing public notices at all stations and in all vehicles, and measures to overcome linguistic, institutional, cultural, economic, historical, or other barriers that may prevent minority and low-income people and populations from effectively participating in a recipient's decision-making process (FTA C 4702.1B, p III-5).

The Public Participation Plan describes the overall goals, guiding principals and methods that Access Services uses regularly to reach out to low-income, minority and LEP communities. The Public Participation Plan aims to offer early and continuous opportunities for the public to be involved in the identification of social, economic and environmental impacts of proposed transportation decisions at Access Services.

Ways to do this include the scheduling of meetings aimed at accommodating minority and LEP communities, coordinating closely with community- and faith based organizations, educational institutions, and other organizations in conducting outreach targeted at minority and LEP communities, the consideration of a marketing strategy using various media sources that cater to LEP populations, and utilizing other means of communication other than writing, including the use of audio or video recording.

This Public Participation Plan is a tailored plan that describes how Access Services undertakes public involvement, information, education, participation and/or outreach activities.

**Background**

Access Services is a local public entity responsible for the administration of the American with Disabilities Act (ADA) mandated Los Angeles County Coordinated Paratransit Plan on behalf of forty-five (45) public fixed route operators including both bus and rail. Access Services provides next-day reservations for curb-to-curb transportation services for eligible riders who, due to a disability, are unable to utilize fixed route public transportation. The work that Access Services performs is on a very “human scale”, as each rider interactively arranges their reservation for transport and the vehicles Access Services utilize carry a small number of passengers. Perhaps because of Access Services’ closeness to its customers, Access Services has a wide variety of avenues by which the customers/the public have an opportunity to
communicate with and influence changes and improvements made to the service, as well as voice any of their concerns.

II. Access Services Public Involvement Opportunities

Access Services has a variety of committees that are designed to take comments from the public and from community organizations and are open for public comment. Also, Access Services ensures that all meetings held by these committees are held at locations that are accessible for individuals with disabilities and in locations that are accessible to public transit routes (as well as easily accessible by Access’ own service). Furthermore, every effort is made to schedule ALL meetings at convenient times to the maximum extent practicable.

**Access Services Board of Directors Monthly Meetings**

As presented in the Organization Chart in Appendix A, overall guidance of Access Services is provided by its Board of Directors. The Board of Directors of Access Services has nine voting members selected from a variety of community associations throughout the County of Los Angeles invested in either local fixed route public transportation (4 seats), city and County government (3 seats) or the disability community (2 seats).

All meetings of the Access Services Board of Directors are open to the public and are often held on the 4th Monday of each month. The meetings are held either at the headquarters of L.A. Metro in Downtown Los Angeles or at Access Services headquarters in the city of El Monte. Both locations are accessible both from a disability perspective as well as from the perspective of being close to public transportation options.

Also on the board, as non-voting members are chairs of the Community Advisory Committee and Transportation Professionals Advisory Committee (both mentioned below). Upcoming Board of Directors’ Meetings are posted on Access Services’ website (accessla.org) along with meeting agendas.
Community Advisory Committee

The Community Advisory Committee (CAC), which meets on the second Tuesday of each month, was formed to provide input and advice to Access Services concerning operational policy issues for Access Services transportation program and to make recommendations to the Access Services Board and staff concerning the Access Services transportation program. CAC members play a very active role in the disability community and have education and expertise in areas dealing with paratransit in Los Angeles County. Members include Los Angeles County residents with disabilities or, where needed, persons with knowledge of specific disabilities relevant to Access Services. Meetings for the CAC are, like the Access Services Board, held in locations central to Los Angeles County and in accessible locations. Upcoming CAC meetings are posted on Access Services' website (www.accessla.org) along with meeting agendas.

The CAC consists of fifteen (15) members. To become a CAC member, customers must first submit an application. Applications are available in both English and Spanish on Access Services' website (www.accessla.org). Received applications are reviewed by a subcommittee consisting of two Board members and the Manager of Customer Support Services, who then choose the new CAC member. To market the CAC, “seat drops” are distributed in vehicles at least once every calendar year. Furthermore, CAC materials, including applications, are made available at every annual Community Meeting.

Transportation Professionals Advisory Committee

The Transportation Professionals Advisory Committee (TPAC), which meets on the second Thursday of each month, was formed to provide input and advice to the Access Services Board of Directors on operational and policy issues. The Committee consists of 15 voting members comprised of transit, paratransit, and social service transportation professionals representing all regions of Los Angeles and surrounding counties. Members are approved by the Access Services Board of Directors according to criteria that ensures the committee represents the public transportation community in Los Angeles County.

When a seat on TPAC is vacated, all stakeholders, including Access Services’ member agencies and other specialized transportation organizations, are notified. All applications for TPAC membership are submitted a member subcommittee made up of two to three TPAC committee members. The applications are reviewed by the
subcommittee and considerations are then forwarded to the Board of Directors for approval. If the membership subcommittee receives applications from potential members and there are no vacancies in the committee, the applicant will be placed on the waiting list.

Just as the Board of Directors and CAC meetings, the meetings of the Transportation Professionals Advisory Committee are open to the public and members of the public may make public comment to this committee. Upcoming TPAC meetings are posted on Access Services’ website (www.accessla.org) along with meeting agendas for individuals to attend.

**Semi-Annual Regional Community Meetings**

Access Services’ County-wide service is broken down into six separate service regions. Annually, Access Services hosts community meetings in each of the six regions (See Appendix B for a service area map for Access Services). Six separate meetings are held at accessible community centers (libraries, community centers, government centers) to both present to the Access Services customer community recent changes and improvements that have taken place with Access Services’ service and also to hear comments and concerns from the ridership of the system.

These meetings are regularly scheduled to take place in Spring and in Autumn and are held regardless of whether or not changes have been implemented with Access Services that affect the customers of a region. These meetings are held to keep customers informed of the work that Access Services is doing as well as to respond to issues raised by members in the community. Each meeting is headed by a Senior Project Administrator attached to that particular service region, who first discusses recent changes to the service and any other noteworthy items. After the Project Administrator’s address, the meeting is opened up to allow customers to ask questions and voice their comments or concerns.

Each of the six meetings are presented with an English-language presentation and afterwards a second meeting is made with a Spanish-language presentation. Language translation services and an American Sign Language translator is available upon request. **Additionally, in order to accommodate low income customers and encourage their attendance, free trips to and from the regional community meetings are provided.**
Notification of community meetings is posted on the Access Services website (www.accessla.org) and each of the van-operating providers for each of the six regions place copies of flyers of the upcoming events in “take one” slots inside of the Access vans. Additionally, post cards may be mailed out to customers notifying them of the date and locations of upcoming meetings. Appendix D contains copies of flyers Access Services prepared for the most recent round of Regional Community Meetings.

As a living document, Access Services’ Public Participation Plan is intended to help customers play an active role in the shaping of Access Services’ decision and policy making. More importantly, the PPP is meant to specifically target communities that have been left out of the process due to linguistic, institutional, cultural, economic, historic or other barriers.

During the last round of Annual Community meetings (April/May 2019), meetings were held in cities with minority and LEP populations, including Baldwin Park (San Gabriel Valley), Lake View Terrace/Sylmar (San Fernando Valley), Los Angeles (West Los Angeles/Central Los Angeles), and Lakewood (Southern Region). All Community Meetings have separate meetings scheduled in English and in Spanish. Fliers for the Community Meetings are placed in vehicles along with postcards of the events are mailed out to customers and are available in both English and Spanish.

The dates and locations of the most recent (April/May 2019) round of Regional Community Meetings are as follows:

1) **Santa Clarita**: April 2nd, The Centre, Santa Clarita
2) **Northern**: April 29th, Lake View Terrace Recreational Center, Lake View Terrace
3) **Antelope Valley**: May 23rd, Antelope Valley Transit Authority offices, Lancaster
4) **Southern**: April 25th, Mayfair Park, Lakewood
5) **West/Central**: April 6th, Pan Pacific Recreation Center, Los Angeles
6) **Eastern**: May 21st, Arts & Recreation Center, Baldwin Park

**III. Access Services Ad Hoc Public Meetings for Fare Changes**

Access Services provides only ADA-complimentary paratransit service following the fixed route service areas and hours of Access Services’ 45 fixed route public transit providers. Access Services generally does not undertake changes to the way it provides its service, hours of
operation and does not coordinate any construction projects. The most recent change impacting customer ability to use Access Services was a proposed fare increase (2012). Due to the importance of this and how it would affect Access Services customers, Access Services hosted a series of special public meetings. As described below, efforts were made to ensure that Access Services’ customers were not only aware of the upcoming change but that they also had an opportunity to voice their opinions and concerns.

**Fare Change Public Meetings**

When Access Services is considering implementing a fare change for its service, as was done in 2012, a variety of methods are performed to ensure that Access customers are informed both of the possible change and also that they may share their comments and concerns at one of many public meetings to discuss this matter.

In 2012, Access Services conducted extensive outreach to its customers with respect to the proposed fare change. Some of the means designed to notify Access Services’ customer base in advance of any change was to conduct direct mailings to customers of Access Services’ newsletters. Eleven ad hoc community meetings were held to discuss the proposed fare increase with stakeholders in addition to one public hearing. **Appendix C** contains copies of flyers Access Services prepared for the ad hoc fare increase meetings.

In 2012, Access Services encouraged public comments and even developed an online web-survey and opened a dedicated telephone line for comments and concerns. Customers were also informed of the fare increase by customer service representatives when they called in to the customer service department. **Access Services’ customer service department utilizes a language services provider which ensures that all customers are guaranteed accurate information about the fare change, regardless of the language in which they speak.** Access Services also accepted comments via mail and fax. “Seat drops” were placed inside all vehicles informing customers of the fare increase.

**Public Meetings Associated with Introduction of Origin-to-Destination and Coordinated Fare Proposals**
In 2015, Access Services expanded services available to eligible customers by adopting Origin to Destination service (Access called its service, ‘Beyond the Curb’). Although this service would not negatively impact customer ability to utilize the existing paratransit service, Access conducted a series of community meetings and a public hearing in the same way that it had for the previously mentioned fare change issue from 2012.

Also, in 2015, Access conducted a series of community meetings and a public hearing to discuss the possibility of adopting a Coordinated Fare system, which would have been a change from its historic two-tiered fare system. Using the same methods, mentioned above, for fare changes, Access reached out to its customers with respect to the possible fare change to ensure that customers would familiar with the implications of this type of fare change. Ultimately, Access did not adopt the proposed coordinated fare system following clarifying language incorporated into the Federal FAST Act, however, to ensure that Access’ customers were familiar with the potential impacts they may have faced, Access conducted the series of public meetings.

IV. Access Services Community Outreach Meetings

Due to the importance of the transportation service that Access Services provides the disability community in Los Angeles County, Access Services’ Operations, Customer Service and Mobility Management staff coordinate with community based organizations and attend multiple community group meetings to share information about what Access Services is and how individuals can utilize paratransit.

These outreach meetings are held at a variety of community centers throughout Los Angeles County ranging from transitional high schools, senior centers, community centers, libraries, local churches and other religious centers.

The outreach meetings are attended by Operations, Customer Service, and/or Mobility Management staff and are designed to either educate potential or existing customers on what Access Services is or respond to particular questions or concerns a particular community may have about an element of Access’ paratransit service. Access Services does not charge a fee for making presentations at these community centers, but rather staff members make presentations and hand out applications and other information related to the Paratransit service that Access Services provides.
The Table in Appendix D lists the over 170 Outreach events that Access staff have participated in from July 2017 through June of 2019. Appendix E provides a map showing an overview of all of the public outreach meetings conducted during the same period, covering much of the urbanized area of Los Angeles County which Access serves.

V. Methods of Notifying Customers of Upcoming Meetings

Access Services utilizes a variety of methods to reach out to the community to both inform the community as to the work that Access Services is doing and also to inform Access Services’ own customers about changes that may come to the service that they rely upon.

Website

In the digital age, Access Services’ website (accessla.org) is an invaluable tool and source of information for its customers. Dates, times and locations of upcoming meetings are all posted on the front page of the website, including any important notifications such as a fare change. In addition, there is a plethora of information to be found on the website, including the Rider’s Guide, application for the service, agendas, calendar, stand sign information directory, rider alerts, travel training information and other transit resources. Customers can also use the website to register to receive e-mail notifications. Access Services’ website can be viewed and/or translated in over seventy (70) different languages using Google translate.

Seat Drops & Mail-outs

Inserting flyers in Access Services vehicles is customary as a method for announcing upcoming meetings to the customers who regularly utilize Access Services. All Access Services minivans are equipped with “take one” drop sleeves where customers can pull a sheet from the sleeve. Access Services prints multiple flyers and shares copies with each of the service providers of the different regions for such information to be put into each of the minivans by their drivers. Access Services may also mail out postcards to every customer notifying them of upcoming regional community meetings.

Advertisement with Partner Organizations
Access Services, due to its nature of providing specialized transportation to individuals with disabilities, has a variety of partner organizations in the human services and transportation services divisions of Los Angeles County. When Access Services wishes to share information throughout the County, it can advertise with managers of these human service and transportation service partners. Access Services’ information can thus be presented as posted flyers at centers or by center staff sharing such information directly with their customer base.

**VI. Customer Satisfaction Survey**

Access Services conducted its bi-annual customer satisfaction survey in late 2017. The purpose of the survey was to gauge customers’ perceptions of the entire transportation process provided by Access Paratransit service. Access Services contracted with the Fairfax Research Group to conduct the survey and to organize a finalized report detailing the findings. To facilitate reliable comparisons between the six service regions, Fairfax Research attempted to complete 200 interviews in each of the six service regions. Because the distribution of customers is uneven with disproportionately larger or smaller numbers of customers in the six service regions, quota sampling was employed to ensure that the telephone interviewing would obtain at least 200 interviews in each of the six regions.

To ensure that the respondents were all active riders, only customers who had received transportation from Access at least once in the previous six months were included in the survey. Access Services intends to continue conducting customer satisfaction surveys going into the future with the goal of better understanding customers’ perceptions of the Paratransit service that Access provides and providing customers with yet another opportunity for voicing their opinions and concerns.

**VII. Media**

Access Services’ principal form of marketing is done through customer outreach conducted by the Operations and Mobility Management Departments along with our various partnerships with community based organizations. As shown throughout this Public Participation Plan, these outreach meetings take place in communities throughout Los Angeles County and frequently in minority communities.

At this time, Access Services does not conduct marketing through large media outlets such as newspapers, radio or television, but instead relies on its partnership with resource centers for
individuals with disabilities and community health fairs and expos where Access staff attend and more fully educate potential applicants and customers about the paratransit services that Access provides to members of the disability community.

At this time, Access Services’ outreach efforts have permitted the agency to explain its’ service and eligibility process on a more personal level to communities who would most likely utilize the service.

**IX. Evaluation**

The Access Services Public Participation Plan will be evaluated and updated by Access staff on a triennial basis. However, if there are major changes to the service or in any of our public participation policies, members of the Planning Department at Access Services will update the PPP accordingly. Furthermore, the Planning Department will continue to track all meetings and community outreach conducted by Access Services every six months going forward. A Microsoft Excel spreadsheet will be used, which will contain the type of meeting, region, location, date and city. **Appendix E** contains a copy of the template spreadsheet used to track all community outreach.

**X. Future Partnerships**

Access Services should continue to maintain and strengthen its partnerships with the variety of transportation and human service agencies throughout Los Angeles County and even in the counties that neighbor Los Angeles County.

By partnering with fixed route operators throughout the County, Access Services will be able to attend additional community meetings hosted by these different service providers throughout the County and work to ensure that as many residents of Los Angeles County who wish to find out about Access Services are able to do so. Additionally, Access Services will ask customers themselves what community based organizations (CBO’s) that they want Access Services to partner with in an attempt to reach more minority and LEP populations throughout Los Angeles County.

**XII. Conclusion**

In large measure, because of the very “human scale” of Access Services’ paratransit model, Access Services already has a large variety of means of communicating with both its own
customer base of individuals as well as share information about Access Services at public meetings throughout the County.

Access Services’ Public Participation Plan is meant to be a living document promoting broad, active participation by our customers, including the targeting of low income, minority and LEP populations. Our policies were created with the goal of engaging our customers, the public and all other stakeholders and providing them with opportunities to voice their concerns and offer their input in matters of policymaking and project planning. To summarize, Access Services utilizes the following strategies to achieve the aforementioned goals:

- Information regarding all meetings is posted on Access Services’ website, accessla.org, which can be viewed in over 70 languages
- Public involvement opportunities include the Annual Regional Community Meetings, Community Center/Information Meetings, the Board of Directors Meetings, CAC and TPAC meetings. All are open to the public and provide invaluable opportunities for customers to play an active role in the Access Services decision-making process.
- In order to assist those with low income, free trips are offered to and from the Community Meetings
- All meetings and outreach are conducted at accessible locations and planned with the intent of accommodating minority and LEP populations (See Appendix F for a map of all meeting locations)
- A customer satisfaction survey was conducted, providing an opportunity for customers to voice their concerns and to let Access Services know what changes they wanted for the service

Access Services is open to additional suggestions as to how it can better provide service to the citizens of Los Angeles County and ensure that all communities in Los Angeles County have the opportunity to provide input on projects and policymaking.
PUBLIC PARTICIPATION PLAN

APPENDIX A
ORGANIZATION CHARTS
Access Services – Administration

- Director, Administration
  - 1 FTE
  - Receptionist
    - 1 FTE
  - Office Services Clerk
    - 1 FTE
  - Administrative Assistant
    - 1 FTE
  - Human Resources Administrator
    - 1 FTE
    - Manager Eligibility
      - 1 FTE
      - Eligibility Coordinator
        - 3 FTE
        - Compliance Specialist
          - 1 FTE
      - Project Administrator
        - 1 FTE
Access Services - Government Relations

Manager Government Affairs & Outreach
1 FTE

Senior Mobility Management Counselor
1 FTE

Community Liaison
1 FTE

Customer Relations Administrator
1 FTE

ADA Coordinator
1 FTE

Customer Relations Advocate
1 FTE

Administrative Assistant
1 FTE

Customer Relations Associate
4 FTE
Access Services - Operations

Chief Operations Officer
1 FTE

Manager Operations
1 FTE

Project Administrator
4 FTE

Operations Service Monitor
5 FTE

Senior Mgr Fleet Design & Maintenance
1 FTE

Safety Analyst
1 FTE

Fleet Maintenance Analyst
2 FTE

Senior Road Safety Inspector
1 FTE

Road Safety Inspector
4 FTE

Emergency Management Coordinator
1 FTE
Access Services - Information Technology

Director
Information Technology
1 FTE

Senior Data Architect
1 FTE

Business Analyst
1 FTE

Systems Administrator
1 FTE

Application Developer
1 FTE

GIS Data Analyst
1 FTE

Network & Help Desk Administrator
1 FTE
Access Services - Finance

- Senior Manager Financial Planning: 1 FTE
- Accounting Supervisor: 1 FTE
  - Senior Accountant: 2 FTE
  - Accountant: 2 FTE
- Manager Procurement & Contract Admin.: 1 FTE
  - Assistant Procurement Specialist: 2 FTE
  - Procurement/Contracts Administrator: 1 FTE
- Risk Management Coordinator: 1 FTE
  - Risk Management Analyst: 1 FTE
- Senior Auditor: 1 FTE
PUBLIC PARTICIPATION PLAN

APPENDIX B
ACCESS SERVICE AREA MAP
This map shows the general service area for each region with Los Angeles County city borders. For a list of cities and neighborhoods included in each region, please refer to pages 35 - 37.

This information is subject to change and therefore cannot be used to determine whether an address is in our service area.

A color version of this map is available at our website at asla.org.
PUBLIC PARTICIPATION PLAN

APPENDIX C

FARE CHANGE COMMUNITY MEETING FLYERS
Access Services
Summer ’12 Community Meetings

Come to your Community Meeting.
We want to hear your thoughts on Access Services proposed fare and service changes.

You may request a free ride to any of the Community Meetings when you make your reservation. To request special accommodations including Braille, Sign Language or Spanish translation, call Access Customer Support at 1.800.827.0829, TDD 1.800.827.1359 at least three (3) business days in advance of your meeting.

Information is also online at asila.org.

Southeastern Region
> Saturday, August 25
12:30pm - 2:30pm
> Thursday, September 6
2pm - 4pm
Barbara J. Riley Community and Senior Center
7810 Quill Dr
Downey, CA 90242

Western/Central Region
> Thursday, August 23
5pm - 7pm
Plummer Park Fiesta Hall
> Thursday, August 30
1pm - 3pm
Plummer Park Great Hall
7377 Santa Monica Bl
West Hollywood, CA 90046

Northern Region
> Friday, August 24
1pm - 3pm
> Wednesday, August 29
6pm - 8pm
Encino Community Center
4935 Balboa Bl
Encino, CA 91316

Eastern Region
> Tuesday, August 21
6pm - 8pm
Glendale Library
Central Auditorium
222 East Harvard St
Glendale, CA 91205
> Friday, August 31
10am - noon
South Coast Air Quality Management District (AQMD) Main Auditorium
21865 Copley Dr
Diamond Bar, CA 91765

Santa Clarita Region
> Wednesday, August 22
6pm - 8pm
> Friday, September 7
1pm - 3pm
Valencia Library Meeting Room
23743 West Valencia Bl
Santa Clarita, CA 91355

Antelope Valley Region
> Wednesday, September 5
1pm - 3pm
Lancaster Public Library Community Meeting Rm
601 West Lancaster Bl
Lancaster, CA 93534
Asista a su reunión comunitaria.
Nos gustaría conocer su opinión sobre los cambios de tarifa y servicio propuestos por Access.

Usted puede solicitar un viaje gratis a cualquiera de las reuniones comunitarias al hacer su reservación. Para solicitar adaptaciones especiales, incluyendo braille, lenguaje de señas o traducción en español, llame al Servicio para el Cliente al 1.800.827.0829, TDD 1.800.827.1359, por lo menos tres (3) días hábiles antes de su reunión.

La información también está disponible en nuestro sitio web asila.org.

<table>
<thead>
<tr>
<th>Región sur</th>
<th>Región este</th>
</tr>
</thead>
<tbody>
<tr>
<td>&gt; Sábado, agosto 25 12:30pm-2:30pm</td>
<td>&gt; Martes, agosto 21 6pm-8pm</td>
</tr>
<tr>
<td>&gt; Jueves, septiembre 6 2pm-4pm Barbara J. Riley Community and Senior Center 7810 Quill Dr Downey, CA 90242</td>
<td>&gt; Glendale Library Central Auditorium 222 East Harvard St Glendale, CA 91205</td>
</tr>
<tr>
<td>Región oeste/central</td>
<td>Viernes, agosto 31 10am-12 del medio día South Coast Air Quality Management District (AQMD) Auditorio Principal 21865 Copley Dr Diamond Bar, CA 91765</td>
</tr>
<tr>
<td>&gt; Jueves, agosto 23 5pm-7pm Plummer Park Fiesta Hall</td>
<td>Región Santa Clarita</td>
</tr>
<tr>
<td>&gt; Jueves, agosto 30 1pm-3pm Plummer Park Great Hall 7377 Santa Monica Bl West Hollywood, CA 90046</td>
<td>&gt; Miércoles, agosto 22 6pm-8pm</td>
</tr>
<tr>
<td>Región norte</td>
<td>&gt; Viernes, septiembre 7 1pm-3pm Valencia Library Cuarto de Juntas 23743 West Valencia Bl Santa Clarita, CA 91355</td>
</tr>
<tr>
<td>&gt; Viernes, agosto 24 1pm-3pm</td>
<td>Región Antelope Valley</td>
</tr>
<tr>
<td>&gt; Miércoles, agosto 29 6pm-8pm Encino Community Center 4935 Balboa Bl Encino, CA 91316</td>
<td>&gt; Miércoles, septiembre 5 1pm-3pm Lancaster Public Library Cuarto de Juntas de la Comunidad 601 West Lancaster Bl Lancaster, CA 93534</td>
</tr>
</tbody>
</table>
Come to a Community Meeting in your area.

Come hear the latest about Access.

Free rides will be provided. To request special accommodations including Braille, Sign Language or other language translation, call Access Customer Support at 1.800.827.0829, TDD 1.800.827.1359 at least three (3) business days in advance of your meeting.

Information is also online at accessla.org.

**Santa Clarita Region**

**Tuesday, April 2**

10am - 11:30am (English)

The Centre

20880 Centre Pointe Pkwy

Santa Clarita, CA 91350

**West/Central Region**

**Saturday, April 6**

1pm - 3pm (English)

4pm - 5:30pm (Spanish)

Pan Pacific Recreation Center

141 S Gardner St

Los Angeles, CA 90036

**Southern Region**

**Thursday, April 25**

10am - 12pm (English)

Mayfair Park, Sierra Room

5720 Clark Ave

Lakewood, CA 90712

**Northern Region**

**Monday, April 29**

2pm - 4pm (English)

Lake View Terrace Recreation Center

11075 Foothill Blvd

Lake View Terrace, CA 91342

**Eastern Region**

**Tuesday, May 21**

12pm - 2pm (English)

3pm - 4:30pm (Spanish)

Arts and Recreation

14403 Pacific Ave, # B

Baldwin Park, CA 91706

**Antelope Valley**

**Thursday, May 23**

2pm - 3:30pm (English)

Antelope Valley Transit Authority

42210 6th St W

Lancaster, CA 93534
Atienda a una Reunión de la Comunidad en su área.

Venga a escuchar las últimas novedades sobre Access.

Se proporcionará transporte gratis. Para solicitar acomodaciones especiales incluyendo braille, lenguaje de señales, o traducción de otro idioma, llame al Servicio para el cliente de Access al 1.800.827.0829, TDD 1.800.827.1359, por lo menos tres (3) días hábiles de anticipación a la reunión.

Para más información visite nuestro sitio web al accessla.org.

---

Región de Santa Clarita
martes, 2 de abril
10am - 11:30am (Inglés)
The Centre
20880 Centre Pointe Pkwy
Santa Clarita, CA 91350

Región del Oeste/Centro
sábado, 6 de abril
1pm - 3pm (Inglés)
4pm - 5:30pm (Español)
Pan Pacific Recreation Center
141 S Gardner St
Los Angeles, CA 90036

Región del Sur
jueves, 25 de abril
10am - 12pm (Inglés)
Mayfair Park, Sierra Room
5720 Clark Ave
Lakewood, CA 90712

Región del Norte
lunes, 29 de abril
2pm - 4pm (Inglés)
Lake View Terrace Recreation Center
11075 Foothill Blvd
Lake View Terrace, CA 91342

---

Región del Este
martes, 21 de mayo
12pm - 2pm (Inglés)
3pm - 4:30pm (Español)
Arts and Recreation
14403 Pacific Ave, # B
Baldwin Park, CA 91706

Región del Valle del Antílope
jueves, 23 de mayo
2pm - 3:30pm (Inglés)
Antelope Valley Transit Authority
42210 6th St W
Lancaster, CA 93534

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Access Services
Reuniones de la Comunidad 2019
PUBLIC PARTICIPATION PLAN

APPENDIX E

COMMUNITY OUTREACH TRACKING SPREADSHEET
PUBLIC PARTICIPATION PLAN

APPENDIX F

MAP OF

PUBLIC MEETING/PUBLIC OUTREACH LOCATIONS
APPENDIX K
ACCESS SERVICES
LIMITED ENGLISH PROFICIENCY PLAN
ACCESS SERVICES
LOS ANGELES COUNTY

LIMITED ENGLISH PROFICIENCY (LEP) PLAN

AND

LANGUAGE ASSISTANCE PLAN

OCTOBER 2019 TO SEPTEMBER 2022
1. **Introduction**

Access Services is the Americans with Disabilities Act (ADA) Paratransit provider for Los Angeles County. Access Services, provides transportation services throughout the Los Angeles County basin, the San Gabriel and San Fernando Valleys as well as the north-county communities of the Santa Clarita Valley and the Antelope Valley. In providing the paratransit service for a County with approximately 10 million residents, Access Services does interact with individuals with varying degrees of ability to speak and/or understand English. For this reason, Access Services has developed this Limited English Proficiency Plan and Language Assistance Plan.

Persons, who have a limited ability to read, write, speak or understand English are Limited English Proficient or “LEP.” In Los Angeles County, according to U.S. Census records and as will be presented later in this Plan, approximately 24% of the County’s residents would describe themselves as not able to communicate in English very well.

This Limited English Proficiency Plan and corresponding Language Assistance Plan are drafted in accordance with the requirements of FTA’s Circular 4702.1B Title VI Requirements and Guidelines for Federal Transit Administration Recipients (October 1, 2012) as well as Executive Order 13166 Improving Access to Services for Persons with Limited English Proficiency (August 16, 2000).

As stated in FTA Circular 4702.1B, “. . . recipients shall take reasonable steps to ensure meaningful access to benefits, services, information, and other important portions of their programs and activities for individuals who are limited-English proficient (LEP).”

The U.S. Department of Transportation handbook, titled "Implementing the Department of Transportation’s Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient (LEP) Persons: A Handbook for Public Transportation Providers, (April 13, 2007)“ (hereinafter “Handbook”), states that Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d et seq., and its implementing regulations provide that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity that receives Federal financial assistance (Handbook, page 5).

The Handbook further adds that Title VI prohibits conduct that has a disproportionate effect on LEP persons because such conduct constitutes national origin discrimination (Handbook, page 5).
Recipients of FTA assistance are encouraged to use the DOT LEP Guidance to determine how best to comply with statutory and regulatory obligations to provide meaningful access to the benefits, services, information and other important portions of their programs and activities for individuals who are LEP. *(Handbook, page 6)*

For many LEP individuals, public transit is a principal transportation mode used. It is extremely important that Access Services is able to communicate effectively with all of its riders, both LEP and non-LEP individuals alike. When Access Services is able to communicate effectively with all of its customers, the service provided is a safer, more reliable, convenient and accessible for all of the agency’s customers. For these reasons, Access Services is committed to taking reasonable steps to ensure meaningful access for LEP individuals to this agency’s paratransit services.

This Plan will demonstrate the efforts that Access Services has undertaken to make its service as accessible as possible to all persons irrespective of their ability to communicate using the English language. Additionally, Access Services does welcome any comments or suggestions that would further improve the effectiveness of this Plan and/or our ability to communicate more effectively with our customers.

II. **FOUR-FACTOR ANALYSIS**

The analysis provided in this report has been developed in order to ensure that Access Services provides language assistance to Limited English Proficient (LEP) persons. FTA Circular 4702.1B spells out the steps necessary to prepare a comprehensive LEP plan. The circular recommends a four-factor analysis be performed. The sections that follow constitute Access Services’ Four-Factor Analysis.

A. **Factor 1: The Number or Proportion of LEP Persons Eligible to be Served or Likely to be Encountered by the Program or Recipient**

Guidance from executive Order 13166 (65 FR 159) states “... A factor in determining the reasonableness of a recipient’s efforts is the number or proportion of people who will be excluded from the benefits or services absent efforts to remove language barriers.” In essence, “the greater the number or proportion of LEP persons from a particular language group served or encountered in the eligible service population, the more likely language services are needed.”

1. **Factor 1, Step 1: Identify How LEP Persons Interact with the Recipient’s Agency.**
Access Services is the ADA complementary paratransit provider for Los Angeles County. There are a variety of ways that Access staff comes in contact with applicants for the service, customers of the service and Personal Care Attendants and guests of the customers.

1) **Application Process:** For a person to receive paratransit eligibility, that person must first request an Access application form, from Access’ Customer Service Division. This interaction is performed through a telephone call with the Customer Service Division.

Currently, for customers who are unable to speak or understand English, a majority of Customer Service Representatives employed by Access’ customer service contractor (Alta at the time of this writing), are bi-lingual in both English and Spanish and beyond those languages, Access contracts with a telephone interpreting service agency ("Language Line Solutions" at the time of this writing) who serve as a telephone interpreter service which an Access Customer Service Representative can conference-call in to a conversation and an interpreter representative can serve as the bridge between the caller and the representative of Access, so that the customer service representative need not speak the caller's language, but the caller is still able to speak and receive information in the language they are most comfortable using.

2) **In-Person Evaluation Process:** Following the completion of the application an applicant for Access will attend an in-person eligibility evaluation at Access’ Eligibility Center in the City of Commerce, approximately 7 miles southeast of Downtown Los Angeles. There are satellite eligibility centers are in the North County communities of Lancaster and Santa Clarita, where the Cities of Commerce and of Los Angeles are distant destinations. The purpose of this in-person evaluation is to determine if the applicant’s disability is sufficiently severe that they would not be able to ride the County’s fixed route transit, but would be better served by paratransit transport.

If a person speaks a language other than English, MTM – the contractor who handles Access’ in-person eligibility evaluations – takes certain steps. Many of MTM’s evaluation staff are proficient in Spanish as well as English. If, however, the applicant speaks a language other than English or Spanish, MTM is able to contact the telephone interpreter service. During the in-person evaluation, in which the applicant must physically walk along a course inside of the Eligibility Center, the evaluator and applicant may listen to the interpreter representative through a mobile
speaker-phone on a phone. The telephone interpreter service representative is able to translate what the applicant is saying to the evaluator and vice versa.

Access previously used telephone headsets for the evaluator and the applicant, however, this technology proved problematic and not as reliable as the current speaker-phone approach which is available on multiple devices.

3) **Eligibility Appeals:** If an applicant, following the in-person eligibility evaluation is determined to be ineligible for paratransit services, the applicant may appeal that determination. If the applicant is a LEP person, the appeals specialist is able to make use of the same telephone interpreter service that was available at the eligibility center. Access pays the expense for the call (as it does for calls made by MTM and its all of its contractor staff) and allows the appeals specialist to concentrate on evaluating the applicant’s argument to be found eligible for paratransit services.

4) **Making Reservations and/or contacting Access:** Once an applicant is found eligible for Access Services and is able to use the services of Access, much of their future communications with Access will be to make reservations for transportation. Trip reservations are made via telephone with one of six contractors Access retains in different parts of Los Angeles County. A map of Access’ Service area is contained in Appendix A. Each of Access’ contractors has a number of call-taker/reservation staff members who speak both English and Spanish. For individuals wishing to make trip reservations, but they do not speak English or Spanish, then the contractor staff can also contact Access’ telephone interpreter service, for translation assistance, similar to the methods listed above.

5) **Traveling On Access:** The principal service that Access provides its customers is paratransit transportation, which is a Next Day curb-to-curb service. During transit, there should be no need for a customer to communicate with an operator as the trip is already in process and the starting point and ending point are automatically transmitted to the van operator’s onboard computer (MDT). Nevertheless, if the customer has an emergency or for another reason the Customer, their Personal Care Attendant or guest needs to communicate with the operator or with Access, Access can effectively respond to this event.

Assuming that the van operator does not speak the language the customer is speaking; they can telephone their dispatch office and request the Language Line service to help with communicating with/for the customer.
As shown above, Access has developed a variety of methods for reaching out to all of our customers, including those with limited English proficiency.

6) New Mobile App and On-Line Applications
Since Access’ 2016 Limited English Proficiency Plan was written, Access has introduced two new services that make use of mobile application software and internet software.

The first mobile application that Access Services introduced to its customers was Where’s My Ride. This mobile application allows a customer to see how close their vehicle is to arriving at the customer’s pick-up location within fifteen minutes of the scheduled arrival time.

Persons with limited English proficiency can utilize the app just as effectively as one who does speak English. The reason for this is the app, though originally designed in English can be translated into other languages depending upon the preferred language setting set on the individual’s mobile phone. So English content will be translated into the customer’s preferred language automatically.

More recently, Access introduced a program that permits customers to reserve trips on Access through an on-line booking portal. With this program, a customer need not speak with an Access contractor reservationist to book their trip.

Similar to the Where’s My Ride application, On-Line Booking is accessible to persons with limited English proficiency. Again, the On-Line Booking program will translate the English language elements depending upon the individual’s preferred language that they set for their mobile phone or computer interface.

Both of these programs have provided improved options for customers in how they schedule their personal time and it is Access’ intent that these services be made available to all Access customers who are interested in using these on-line/mobile application services irrespective of a customer’s primary language.
2. **Factor 1, Step 2: Identify LEP Communities, and Assess the Number or Proportion of LEP Persons from each Language Group to Determine the Appropriate Language Services for each Language Group.**

Access Services provides paratransit services throughout Los Angeles County. Please see Appendix A for a map of Access’ service area. This section will draw data from the U.S. Census to show the variety of languages spoken in Los Angeles County.

Using the U.S. Census’ American Community Survey 5-Year Estimates (2007-2011), and drawing from the Report “Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over” for Los Angeles County, there are approximately 40 recognized languages (or language groups) spoken in Los Angeles County.

**Table 1** summarizes the variety of languages in use in Los Angeles County and the percentage and number of people who reported speaking English less than “very well” to the U.S. Census. As shown in **Table 1**, throughout Los Angeles County, there are 42 languages or language-groups the Census’ American Community Survey (2017) identifies as being spoken, with 35 such languages or language-groups with communities of 1,000 or more people indicating that they speak English less than “very well.”

Of the variety of languages spoken in Los Angeles County, Spanish, is the most commonly spoken language by persons who associate themselves as speaking English less than “very well.” A total of 1.49 million residents of Los Angeles County (or 15.6% of the County’s population, indicate that they speak English less than “very well.”

The next largest language groups spoken in Los Angeles County are Chinese, Korean and Armenian with much smaller percentages who identified as speaking English “less than ‘very well’” in comparison to Spanish (2.44% Chinese; 1.11% Korean and 0.87% Armenian).

For all of these language groups listed above, and several more, Access provides telephone translation services so that customers and members of the public can receive information about Access from applying for the service to requesting transportation.

3. **Factor 1, Step 3: Identify the Literacy Skills of LEP Populations in Their Native Languages, in Order to Determine Whether Translation of Documents will be an Effective Practice.**

Access has made information about its service available in a variety of ways and in multiple languages. For Los Angeles County, the U.S. Census American Community
## TABLE 1
LOS ANGELES COUNTY LANGUAGES SPOKEN
AND POPULATION THAT SPEAKS ENGLISH
LESS THAN "VERY WELL"

<table>
<thead>
<tr>
<th>Languages spoken in Los Angeles county</th>
<th>Estimated Populations</th>
<th>Number of Population who Speak English less than &quot;very well&quot;</th>
<th>Percentage of Los Angeles County Population That Does not Speak English &quot;very well&quot;</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total</td>
<td>9,545,528</td>
<td>2,245,600</td>
<td>24%</td>
</tr>
<tr>
<td>Speak only English</td>
<td>4,112,214</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Spanish</td>
<td>3,763,551</td>
<td>1,492,074</td>
<td>15.63%</td>
</tr>
<tr>
<td>Chinese (incl. Mandarin, Cantonese)</td>
<td>390,529</td>
<td>233,330</td>
<td>0.72%</td>
</tr>
<tr>
<td>Korean</td>
<td>174,786</td>
<td>105,851</td>
<td>1.11%</td>
</tr>
<tr>
<td>Armenian</td>
<td>175,341</td>
<td>83,440</td>
<td>0.67%</td>
</tr>
<tr>
<td>Tagalog (incl. Filipino)</td>
<td>233,330</td>
<td>68,587</td>
<td>0.72%</td>
</tr>
<tr>
<td>Vietnamese</td>
<td>87,313</td>
<td>52,158</td>
<td>0.55%</td>
</tr>
<tr>
<td>Persian (incl. Farsi, Dari)</td>
<td>75,113</td>
<td>34,666</td>
<td>0.36%</td>
</tr>
<tr>
<td>Japanese</td>
<td>52,623</td>
<td>24,779</td>
<td>0.26%</td>
</tr>
<tr>
<td>Russian</td>
<td>50,994</td>
<td>23,210</td>
<td>0.24%</td>
</tr>
<tr>
<td>Thai, Lao, or other Tai-Kadai languages</td>
<td>28,796</td>
<td>15,756</td>
<td>0.17%</td>
</tr>
<tr>
<td>Khmer</td>
<td>28,122</td>
<td>15,678</td>
<td>0.16%</td>
</tr>
<tr>
<td>Arabic</td>
<td>44,300</td>
<td>15,664</td>
<td>0.16%</td>
</tr>
<tr>
<td>Ilocano, Samoan, Hawaiian, or other Austronesian languages</td>
<td>29,317</td>
<td>9,735</td>
<td>0.10%</td>
</tr>
<tr>
<td>French (incl. Cajun)</td>
<td>40,949</td>
<td>7,100</td>
<td>0.07%</td>
</tr>
<tr>
<td>Other languages of Asia</td>
<td>13,317</td>
<td>6,678</td>
<td>0.07%</td>
</tr>
<tr>
<td>Hindi</td>
<td>20,906</td>
<td>5,248</td>
<td>0.05%</td>
</tr>
<tr>
<td>Nepali, Marathi, or other Indic languages</td>
<td>10,815</td>
<td>4,343</td>
<td>0.05%</td>
</tr>
<tr>
<td>Portuguese</td>
<td>12,754</td>
<td>4,092</td>
<td>0.04%</td>
</tr>
<tr>
<td>Urdu</td>
<td>12,932</td>
<td>3,910</td>
<td>0.04%</td>
</tr>
<tr>
<td>Italian</td>
<td>15,400</td>
<td>3,867</td>
<td>0.04%</td>
</tr>
<tr>
<td>Amharic, Somali, or other Afro-Asianic languages</td>
<td>11,486</td>
<td>3,776</td>
<td>0.04%</td>
</tr>
<tr>
<td>Punjabi</td>
<td>7,405</td>
<td>3,293</td>
<td>0.03%</td>
</tr>
<tr>
<td>Bengali</td>
<td>8,353</td>
<td>3,177</td>
<td>0.03%</td>
</tr>
<tr>
<td>Hebrew</td>
<td>22,751</td>
<td>3,081</td>
<td>0.03%</td>
</tr>
<tr>
<td>Other Indo-European languages</td>
<td>13,360</td>
<td>2,716</td>
<td>0.03%</td>
</tr>
<tr>
<td>Other and unspecified languages</td>
<td>7,817</td>
<td>2,458</td>
<td>0.03%</td>
</tr>
<tr>
<td>Yoruba, Twi, Igbo, or other languages of Western Africa</td>
<td>10,473</td>
<td>1,983</td>
<td>0.02%</td>
</tr>
<tr>
<td>Telugu</td>
<td>6,336</td>
<td>1,966</td>
<td>0.02%</td>
</tr>
<tr>
<td>Ukrainian or other Slavic languages</td>
<td>5,824</td>
<td>1,944</td>
<td>0.02%</td>
</tr>
<tr>
<td>Gujarati</td>
<td>5,760</td>
<td>1,902</td>
<td>0.02%</td>
</tr>
<tr>
<td>German</td>
<td>18,898</td>
<td>1,757</td>
<td>0.02%</td>
</tr>
<tr>
<td>Tamil</td>
<td>6,858</td>
<td>1,352</td>
<td>0.01%</td>
</tr>
<tr>
<td>Serbo-Croatian</td>
<td>4,791</td>
<td>1,256</td>
<td>0.01%</td>
</tr>
<tr>
<td>Swahili or other languages of Central, Eastern, and Southern Africa</td>
<td>6,177</td>
<td>1,178</td>
<td>0.01%</td>
</tr>
<tr>
<td>Malayalam, Kannada, or other Dravidian languages</td>
<td>4,303</td>
<td>1,057</td>
<td>0.01%</td>
</tr>
<tr>
<td>Polish</td>
<td>4,296</td>
<td>992</td>
<td>0.01%</td>
</tr>
<tr>
<td>Yiddish, Pennsylvania Dutch or other West Germanic languages</td>
<td>6,617</td>
<td>817</td>
<td>0.01%</td>
</tr>
<tr>
<td>Greek</td>
<td>4,089</td>
<td>676</td>
<td>0.01%</td>
</tr>
<tr>
<td>Haitian</td>
<td>4,891</td>
<td>335</td>
<td>0.00%</td>
</tr>
<tr>
<td>Hmong</td>
<td>1,127</td>
<td>120</td>
<td>0.00%</td>
</tr>
<tr>
<td>Other Native languages of North America</td>
<td>402</td>
<td>89</td>
<td>0.00%</td>
</tr>
<tr>
<td>Navajo</td>
<td>112</td>
<td>77</td>
<td>0.00%</td>
</tr>
</tbody>
</table>

Source: U.S. Census Bureau, 2017 American Community Survey 1-Year Estimates

Dataset: LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER
Survey provides information about “spoken” language skills, but not about literacy skills in English or other languages.

Despite not having information regarding literacy levels, Access has already developed means by which Access customers and/or members of the public may read Access’ information in a great variety of methods.

All documents important for customers of Access to review are available in English and also in Spanish, this includes Access’ application, Rider’s Guide and Community Meeting notices.

Additionally, Access’ Rider’s Guide and Community Meeting notices are available through Access’ website (www.accessla.org). Notices of community meetings and the text of the entire Riders’ Guide is available on Access’ website and can be translated (using a link contained on the Access website) through “Google Translate” into over 100 languages.

Information about applying for Access is also available through Google Translate in a variety of languages, and it instructs potential applicants to telephone Access for further information. Additionally, as mentioned above, as needed operators can communicate with a customer through Access’ telephone interpreter service.

4. **Factor 1, Step 4: Identify Whether LEP Persons Are Underserved by the Recipient Due to Language Barriers.**

Access recognizes the importance of its transportation services to its customers and has used a variety of technology improvements to ensure that individuals who benefit from Access’ services do not face barriers to receive such services and effectively receive the benefits they need.

**Telephone Interpreter Service:** Access provides a telephone translation service which allows customers to apply for service, go through the in-person eligibility process, reserve transportation and ask questions in their native language without facing a barrier due to being Limited English Proficient.

**Physical and On-Line Translation of Documents:** Additionally, all of Access’ important customer documents are printed in English and Spanish and Access’ important customer documents are also available on-line and can be translated through an on-line “Google
Translate” service (an example of an important customer document would be the Access Services Riders’ Guide).

At this time, Access believes that its work has removed the language barriers that may have existed in the past, which could have made it difficult for individuals to apply for or use Access’ paratransit services.

Access is always seeking to improve its services and welcomes suggestions from our customers, partners and FTA.

B. **Factor 2: The Frequency with which LEP Persons Come into Contact with the Program.**

The purpose behind this second factor of the four-factor analysis is provided in the FTA’s Handbook on implementing policy guidance to LEP persons. In this factor, “recipient should assess, as accurately as possible, the frequency with which they have or should have contact with LEP individuals from different language groups seeking assistance, as the more frequent the contact, the more likely enhanced language services will be needed” (Handbook, April, 2007, p. 18).

A very effective way that Access can determine the frequency with which this agency comes in contact with LEP persons are the records that Access maintains associated with its telephone interpreter service.

Unlike other public transit systems, Access’ customers must telephone Access in order to receive transportation. When a customer (or even a person who is not currently a customer of Access) telephones Access and the caller does not speak English, the Access operator connects with Access’ telephone interpreter service.

**Table 2** provides a summary of the frequency that interpreter services were used by Access operators between July 2017 and May 2019. During this nearly two year period, the interpreter service was utilized by Access’ call center/Customer Service staff, its Provider staff and its Eligibility/Appeals staff in over 26,000 conversations with interpreters for 58 different languages.

**Table 3** presents a summary of the languages that received more frequent interpreter requests (over 200 times a specific language sought for translation over the course of two years [July 2017 to May 2019]).
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>1 Akan</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>0.00%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2 Akateko</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>0.00%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3 Albanian</td>
<td>1</td>
<td>1</td>
<td>2</td>
<td>0.01%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>4 Amharic</td>
<td>3</td>
<td>10</td>
<td>18</td>
<td>2</td>
<td>33</td>
<td>0.13%</td>
</tr>
<tr>
<td>5 Arabic</td>
<td>263</td>
<td>210</td>
<td>224</td>
<td>137</td>
<td>834</td>
<td>3.18%</td>
</tr>
<tr>
<td>6 Armenian</td>
<td>1734</td>
<td>2037</td>
<td>1979</td>
<td>1915</td>
<td>7685</td>
<td>29.24%</td>
</tr>
<tr>
<td>7 Assyrian</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>0.00%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>8 Bengali</td>
<td>2</td>
<td>3</td>
<td>4</td>
<td>2</td>
<td>11</td>
<td>0.04%</td>
</tr>
<tr>
<td>9 Bulgarian</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>0.00%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>10 Burmese</td>
<td>5</td>
<td>5</td>
<td>3</td>
<td>6</td>
<td>19</td>
<td>0.07%</td>
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<tr>
<td>11 Cambodian</td>
<td>68</td>
<td>53</td>
<td>39</td>
<td>29</td>
<td>189</td>
<td>0.72%</td>
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<tr>
<td>12 Cantonese (Chinese)</td>
<td>508</td>
<td>570</td>
<td>518</td>
<td>395</td>
<td>1991</td>
<td>7.59%</td>
</tr>
<tr>
<td>13 Chao-Chow</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>0.00%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>14 Chin</td>
<td>2</td>
<td>2</td>
<td>2</td>
<td>0.01%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>15 Croatian</td>
<td>6</td>
<td>4</td>
<td>1</td>
<td>11</td>
<td>0.04%</td>
<td></td>
</tr>
<tr>
<td>16 Czech</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>2</td>
<td>0.01%</td>
<td></td>
</tr>
<tr>
<td>17 Dari</td>
<td>2</td>
<td>2</td>
<td>3</td>
<td>1</td>
<td>8</td>
<td>0.03%</td>
</tr>
<tr>
<td>18 Farsi</td>
<td>785</td>
<td>872</td>
<td>755</td>
<td>957</td>
<td>3379</td>
<td>12.89%</td>
</tr>
<tr>
<td>19 French</td>
<td>1</td>
<td>1</td>
<td>6</td>
<td>4</td>
<td>12</td>
<td>0.05%</td>
</tr>
<tr>
<td>20 Fuzhou</td>
<td>1</td>
<td>1</td>
<td>2</td>
<td>4</td>
<td>0.02%</td>
<td></td>
</tr>
<tr>
<td>21 Georgian</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>0.00%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>22 German</td>
<td>3</td>
<td>1</td>
<td>4</td>
<td>0.02%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>23 Gujarati</td>
<td>10</td>
<td>5</td>
<td>15</td>
<td>0.06%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>24 Haitian Creole</td>
<td>1</td>
<td>2</td>
<td>3</td>
<td>0.01%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>25 Hebrew</td>
<td>5</td>
<td>3</td>
<td>7</td>
<td>20</td>
<td>0.08%</td>
<td></td>
</tr>
<tr>
<td>26 Hindi</td>
<td>18</td>
<td>16</td>
<td>28</td>
<td>16</td>
<td>78</td>
<td>0.30%</td>
</tr>
<tr>
<td>27 Hungarian</td>
<td>1</td>
<td>1</td>
<td>2</td>
<td>3</td>
<td>0.01%</td>
<td></td>
</tr>
<tr>
<td>28 Igbo</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>2</td>
<td>0.01%</td>
<td></td>
</tr>
<tr>
<td>29 Indonesian</td>
<td>4</td>
<td>4</td>
<td>5</td>
<td>3</td>
<td>16</td>
<td>0.06%</td>
</tr>
<tr>
<td>30 Italian</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>0.00%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>31 Japanese</td>
<td>14</td>
<td>18</td>
<td>5</td>
<td>13</td>
<td>50</td>
<td>0.19%</td>
</tr>
<tr>
<td>32 Karen</td>
<td>2</td>
<td>2</td>
<td>2</td>
<td>0.01%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>33 Korean</td>
<td>655</td>
<td>635</td>
<td>595</td>
<td>507</td>
<td>2392</td>
<td>9.12%</td>
</tr>
<tr>
<td>34 Kurmanji</td>
<td>1</td>
<td>1</td>
<td>2</td>
<td>1</td>
<td>0.01%</td>
<td></td>
</tr>
<tr>
<td>35 Lithuanian</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>0.00%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>36 Mandarin (Chinese)</td>
<td>1111</td>
<td>1193</td>
<td>1210</td>
<td>901</td>
<td>4415</td>
<td>16.84%</td>
</tr>
<tr>
<td>37 Marathi</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>0.00%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>38 Polish</td>
<td>1</td>
<td>4</td>
<td>1</td>
<td>6</td>
<td>0.02%</td>
<td></td>
</tr>
<tr>
<td>39 Portuguese</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>0.00%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>40 Punjabi</td>
<td>10</td>
<td>3</td>
<td>9</td>
<td>3</td>
<td>25</td>
<td>0.10%</td>
</tr>
<tr>
<td>41 Romanian</td>
<td>6</td>
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<td>2</td>
<td>2</td>
<td>16</td>
<td>0.06%</td>
</tr>
<tr>
<td>42 Russian</td>
<td>841</td>
<td>913</td>
<td>761</td>
<td>686</td>
<td>3201</td>
<td>12.21%</td>
</tr>
<tr>
<td>43 Serbian</td>
<td>3</td>
<td>1</td>
<td>2</td>
<td>6</td>
<td>0.02%</td>
<td></td>
</tr>
<tr>
<td>44 Sinhalese</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>3</td>
<td>0.01%</td>
<td></td>
</tr>
<tr>
<td>45 Shanghainese</td>
<td>1</td>
<td>1</td>
<td>2</td>
<td>0.01%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>46 Somali</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>0.00%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>47 Sorani</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>0.00%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>48 Spanish</td>
<td>204</td>
<td>172</td>
<td>253</td>
<td>290</td>
<td>919</td>
<td>3.51%</td>
</tr>
<tr>
<td>49 Swahil</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>0.00%</td>
<td></td>
<td></td>
</tr>
<tr>
<td>50 Tagalog</td>
<td>82</td>
<td>65</td>
<td>70</td>
<td>50</td>
<td>267</td>
<td>1.02%</td>
</tr>
<tr>
<td>51 Taiwanese</td>
<td>1</td>
<td>1</td>
<td>2</td>
<td>1</td>
<td>4</td>
<td>0.02%</td>
</tr>
<tr>
<td>52 Thai</td>
<td>15</td>
<td>15</td>
<td>13</td>
<td>2</td>
<td>45</td>
<td>0.17%</td>
</tr>
<tr>
<td>53 Toishanese</td>
<td>9</td>
<td>14</td>
<td>8</td>
<td>31</td>
<td>12%</td>
<td></td>
</tr>
<tr>
<td>54 Turkish</td>
<td>2</td>
<td>2</td>
<td>1</td>
<td>5</td>
<td>0.02%</td>
<td></td>
</tr>
<tr>
<td>55 Ukranian</td>
<td>1</td>
<td>2</td>
<td>3</td>
<td>6</td>
<td>0.02%</td>
<td></td>
</tr>
<tr>
<td>56 Urdu</td>
<td>1</td>
<td>2</td>
<td>1</td>
<td>3</td>
<td>7</td>
<td>0.03%</td>
</tr>
<tr>
<td>57 Vietnamese</td>
<td>129</td>
<td>154</td>
<td>123</td>
<td>91</td>
<td>497</td>
<td>1.90%</td>
</tr>
<tr>
<td>58 Yoruba</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>0.00%</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Total:</strong></td>
<td><strong>6490</strong></td>
<td><strong>7003</strong></td>
<td><strong>6669</strong></td>
<td><strong>6056</strong></td>
<td><strong>26218</strong></td>
<td><strong>100.00%</strong></td>
</tr>
</tbody>
</table>
### TABLE 3
MOST REQUESTED LANGUAGES* TRANSLATED THROUGH ACCESS SERVICES' TELEPHONE INTERPRETER SERVICE (JULY 2017 TO MAY 2019)

<table>
<thead>
<tr>
<th>Most Requested Languages (July 2017-May 2019)</th>
<th>Total Call Requests</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Arabic</td>
<td>834</td>
<td>3.18%</td>
</tr>
<tr>
<td>Armenian</td>
<td>7665</td>
<td>29.24%</td>
</tr>
<tr>
<td>Cantonese (Chinese)</td>
<td>1991</td>
<td>7.59%</td>
</tr>
<tr>
<td>Farsi</td>
<td>3379</td>
<td>12.89%</td>
</tr>
<tr>
<td>Korean</td>
<td>2392</td>
<td>9.12%</td>
</tr>
<tr>
<td>Mandarin (Chinese)</td>
<td>4415</td>
<td>16.84%</td>
</tr>
<tr>
<td>Russian</td>
<td>3201</td>
<td>12.21%</td>
</tr>
<tr>
<td>Spanish</td>
<td>919</td>
<td>3.51%</td>
</tr>
<tr>
<td>Tagalog</td>
<td>267</td>
<td>1.02%</td>
</tr>
<tr>
<td>Vietnamese</td>
<td>497</td>
<td>1.90%</td>
</tr>
<tr>
<td><strong>Total Language Line Requests:</strong></td>
<td><strong>26218</strong></td>
<td><strong>100.00%</strong></td>
</tr>
<tr>
<td><strong>Total Translation Requests of Most Frequently Requested languages:</strong></td>
<td><strong>25560</strong></td>
<td><strong>97.5%</strong></td>
</tr>
</tbody>
</table>
In the past, the most common requested language was Spanish, which reflects Access’ policy of having its important documents available in Spanish as well as English. However, the frequency of seeking language translation for Spanish through the telephone language line has fallen in recent years. This is a reflection that many call-center staff at Access and at Access' contractors are fluent in both Spanish and English.

**Table 4** breaks out language requests through the telephone translation service by Access’ business groups. The groups analyzed are those from Access’ in-house administrative staff and call center, to all of its contractor staff who perform telephone calls with Access customers.

What the data in these tables provides is two-fold (1) there are a number of LEP persons that Access regularly comes in contact with in the course of providing its service throughout Los Angeles County and (2) Access is performing a very effective job of adapting its service to communicate with the public and the agency's diverse customer base.

1. **Factor 2, Step 1: Use of Bus and Rail Service.**
   
   As addressed above, Access Services operates only paratransit, curb-to-curb and next-day service. In order for customers (LEP and non-LEP) to utilize Access’ transportation services, they must make telephone reservations the day before (or the recently introduced on-line booking service).

   In these instances, Access can effectively respond to the concerns of LEP customers with the telephone interpreter services. However, with Spanish as the most frequently spoken language other than English by Access’ customer base, it is common for many of the Access and service provider telephone operator staff to be fluent in both English and Spanish. Additionally, Access’ on-line booking service will translate into the language selected by the individual in their mobile device.

2. **Factor 2, Step 2: Purchase of passes and tickets through vending machines, outlets, websites and over the phone.**

   Again, Access Services’ paratransit operations are different from other public transit forms. To utilize Access, a customer must have an Access identification card.

   An Access customer will only receive this identification card upon successfully receiving paratransit eligibility through Access’ eligibility center.
### TABLE 4
TOTAL LANGUAGES TRANSLATED THROUGH ACCESS SERVICES’ TELEPHONE INTERPRETER SERVICE - BY ACCESS WORK GROUP (JULY 2017 TO MAY 2019)

<table>
<thead>
<tr>
<th>Requested Languages</th>
<th>Access Work Groups</th>
<th>Eligibility &amp; Appeals</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Access Services</td>
<td>Service Providers</td>
</tr>
<tr>
<td>1 Akan</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>2 Akateko</td>
<td>1</td>
<td>0</td>
</tr>
<tr>
<td>3 Albanian</td>
<td>0</td>
<td>2</td>
</tr>
<tr>
<td>4 Amharic</td>
<td>15</td>
<td>6</td>
</tr>
<tr>
<td>5 Arabic</td>
<td>248</td>
<td>399</td>
</tr>
<tr>
<td>6 Armenian</td>
<td>1915</td>
<td>4022</td>
</tr>
<tr>
<td>7 Assyrian</td>
<td>0</td>
<td>1</td>
</tr>
<tr>
<td>8 Bengali</td>
<td>3</td>
<td>1</td>
</tr>
<tr>
<td>9 Bulgarian</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>10 Burmese</td>
<td>4</td>
<td>6</td>
</tr>
<tr>
<td>11 Cambodian</td>
<td>65</td>
<td>15</td>
</tr>
<tr>
<td>12 Cantonese (Chinese)</td>
<td>625</td>
<td>536</td>
</tr>
<tr>
<td>13 Chao-Chow</td>
<td>1</td>
<td>0</td>
</tr>
<tr>
<td>14 Chin</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>15 Croatian</td>
<td>1</td>
<td>8</td>
</tr>
<tr>
<td>16 Czech</td>
<td>0</td>
<td>1</td>
</tr>
<tr>
<td>17 Dari</td>
<td>1</td>
<td>4</td>
</tr>
<tr>
<td>18 Farsi</td>
<td>1032</td>
<td>1632</td>
</tr>
<tr>
<td>19 French</td>
<td>3</td>
<td>7</td>
</tr>
<tr>
<td>20 Fuzhou</td>
<td>0</td>
<td>1</td>
</tr>
<tr>
<td>21 Georgian</td>
<td>0</td>
<td>1</td>
</tr>
<tr>
<td>22 German</td>
<td>2</td>
<td>2</td>
</tr>
<tr>
<td>23 Gujarati</td>
<td>4</td>
<td>2</td>
</tr>
<tr>
<td>24 Haitian Creole</td>
<td>1</td>
<td>2</td>
</tr>
<tr>
<td>25 Hebrew</td>
<td>6</td>
<td>12</td>
</tr>
<tr>
<td>26 Hindi</td>
<td>24</td>
<td>29</td>
</tr>
<tr>
<td>27 Hungarian</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
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<tr>
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<td>32 Karen</td>
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</tr>
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<td>34 Kurmanji</td>
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<tr>
<td>35 Lithuanian</td>
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</tr>
<tr>
<td>36 Mandarin (Chinese)</td>
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<td>1953</td>
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<tr>
<td>37 Marathi</td>
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<td>2</td>
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<tr>
<td>40 Punjabi</td>
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<td>5</td>
</tr>
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<td>41 Romanian</td>
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<td>981</td>
<td>1876</td>
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<tr>
<td>43 Serbian</td>
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<td>3</td>
</tr>
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<td>44 Sinhalese</td>
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<td>1</td>
</tr>
<tr>
<td>45 Shanghaiese</td>
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</tr>
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<td>0</td>
</tr>
<tr>
<td>47 Sorani</td>
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<td>1</td>
</tr>
<tr>
<td>48 Spanish</td>
<td>144</td>
<td>179</td>
</tr>
<tr>
<td>49 Swahili</td>
<td>1</td>
<td>0</td>
</tr>
<tr>
<td>50 Tagalog</td>
<td>123</td>
<td>94</td>
</tr>
<tr>
<td>51 Taiwanese</td>
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<td>2</td>
</tr>
<tr>
<td>52 Thai</td>
<td>16</td>
<td>11</td>
</tr>
<tr>
<td>53 Tchishane</td>
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<td>1</td>
</tr>
<tr>
<td>54 Turkish</td>
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<td>3</td>
<td>3</td>
</tr>
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<td>56 Urdu</td>
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<td>2</td>
</tr>
<tr>
<td>57 Vietnamese</td>
<td>211</td>
<td>146</td>
</tr>
<tr>
<td>58 Yoruba</td>
<td>1</td>
<td>0</td>
</tr>
<tr>
<td><strong>Total:</strong></td>
<td><strong>7684</strong></td>
<td><strong>11807</strong></td>
</tr>
</tbody>
</table>

---

**Main Administrative Offices (ex. Risk Management), and Access’ Customer Service, Operations Monitoring Center, and Travel Training Contractors**

**Service Providers** - Includes all transportation contractors for each of Access’ six regions

**Eligibility and Appeals** - Includes Access’ Eligibility contractor staff (MTM) and appeals specialists
Similar to Step 1 above, Access has effectively removed language barriers for our agency’s customers by providing language interpreter services over the telephone to arrange eligibility and make transportation reservations as well as to make translation services available through mobile speaker-phones during the in-person session of the eligibility evaluation so that a LEP person may effectively communicate with their evaluator.

3. **Factor 2, Step 3: Participation in public meetings.**

   **Public Outreach Meetings:**
   Access participates in a variety of public meetings/public outreach sessions and conducts its own annual community meetings every year throughout Los Angeles County.

   Generally, regional centers, senior centers or other social service center request presentations on the types of service that Access provides to persons with disabilities.

   It is common that these outreach meetings can be held in minority and/or LEP communities. In such cases, the event organizer (social center) will arrange to provide an interpreter to be present at the event, if it is anticipated that there will be a number of LEP individuals attending the meeting who would need language assistance in a language other than English.

   **Appendix B** provides a list of over 170 different public meetings and outreach meetings conducted between July 2017 and June 2019. **Appendix C** presents a map of Los Angeles County with map-pins showing the different public meeting locations.

   The table and map are intended to demonstrate Access’ commitment to conducting these public meetings throughout Access’ Los Angeles County service area.

   **Annual Access Community Meetings:**
   Each year Access conducts Community Meetings. One meeting is held in each of Access’ service regions (see **Appendix A** to see a map of Access’ service area and six service regions).

   Notice of these meetings is provided in English and in Spanish in mailings, emails and also in “seat drops” on board Access vehicles. Separate meetings are conducted in
English and in Spanish. If requested, Access will provide a sign language interpreter, materials in Braille, or language interpreter for persons with limited English proficiency who do not speak either English or Spanish.

During Access’ most recent community meetings (May 2019), a customer requested the assistance of a language interpreter who spoke Indonesian and an interpreter was provided for the customer so that she could participate in the meeting.

Public Governance Meetings:
At this time, language interpreters are not present at Access’ Board of Directors meeting, however, were need for such to arise at a meeting, a public comment made could be performed through the assistance of the telephone interpreter service Access has through its other communications. The means by which this would be effectuated would be an Access staff representative would be directed by the Board to discuss the matter directly with the person. The staff member could communicate through the interpreter service and afterwards the staff member would record the person’s comment and ensure that it is received by the Board of Directors.

As addressed in earlier sections, Access’ contracted Customer Service staff members are able to effectively communicate with LEP persons through either being one of the many Access call-taker staff members who speaks both English and Spanish or rather the call-taker staff member may connect with the telephone interpreter service Access contracts with and thus proceed with the conversation with the assistance of the interpreter.

5. Factor 2, Step 5: Ridership surveys.
Access conducted a telephone survey of its customer population in October and November of 2017. All active Access customers (those who had taken at least one Access trip in the previous six months), were included as a possible person to contact as part of the survey.

A new telephone survey of Access’ customer population is next scheduled to take place in 2019.

Table 5 presents the results uncovered from the Customer Satisfaction Survey. The vast majority of Access customers primarily speak either English (70%) or Spanish
## TABLE 5
ACCESS CUSTOMER SURVEY DATA (2017)
PRIMARY LANGUAGE SPOKEN AT HOME

<table>
<thead>
<tr>
<th>Language</th>
<th>Total</th>
<th>Antelope Valley</th>
<th>Eastern</th>
<th>Northern</th>
<th>Santa Clarita</th>
<th>Southern</th>
<th>West/ Central</th>
</tr>
</thead>
<tbody>
<tr>
<td>English</td>
<td>70%</td>
<td>84%</td>
<td>63%</td>
<td>64%</td>
<td>82%</td>
<td>79%</td>
<td>62%</td>
</tr>
<tr>
<td>Spanish</td>
<td>19%</td>
<td>8%</td>
<td>26%</td>
<td>19%</td>
<td>8%</td>
<td>17%</td>
<td>19%</td>
</tr>
<tr>
<td>Armenian</td>
<td>1%</td>
<td>0%</td>
<td>3%</td>
<td>4%</td>
<td>2%</td>
<td>0%</td>
<td>0%</td>
</tr>
<tr>
<td>Cantonese/Mandarin</td>
<td>0.4%</td>
<td>0%</td>
<td>1%</td>
<td>0%</td>
<td>0%</td>
<td>0.4%</td>
<td>0%</td>
</tr>
<tr>
<td>Arabic</td>
<td>0.4%</td>
<td>1%</td>
<td>1%</td>
<td>1%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
</tr>
<tr>
<td>Farsi</td>
<td>1%</td>
<td>1%</td>
<td>0.4%</td>
<td>3%</td>
<td>0%</td>
<td>0%</td>
<td>2%</td>
</tr>
<tr>
<td>Tagalog</td>
<td>1%</td>
<td>0%</td>
<td>1%</td>
<td>2%</td>
<td>3%</td>
<td>0.4%</td>
<td>1%</td>
</tr>
<tr>
<td>Russian</td>
<td>1%</td>
<td>0%</td>
<td>0.4%</td>
<td>0.4%</td>
<td>0%</td>
<td>0%</td>
<td>3%</td>
</tr>
<tr>
<td>Vietnamese</td>
<td>0.2%</td>
<td>0%</td>
<td>0.4%</td>
<td>0%</td>
<td>0%</td>
<td>0%</td>
<td>0.4%</td>
</tr>
<tr>
<td>Other</td>
<td>1%</td>
<td>1%</td>
<td>0.4%</td>
<td>2%</td>
<td>2%</td>
<td>1%</td>
<td>3%</td>
</tr>
<tr>
<td>Refused</td>
<td>3%</td>
<td>3%</td>
<td>2%</td>
<td>4%</td>
<td>3%</td>
<td>3%</td>
<td>6%</td>
</tr>
<tr>
<td>Base</td>
<td>1319</td>
<td>197</td>
<td>275</td>
<td>243</td>
<td>62</td>
<td>282</td>
<td>243</td>
</tr>
</tbody>
</table>

(19%) at home. There were seven other languages that were listed by respondents to the survey, but no one language exceeded 1%.

This reinforces Access' practice of providing its printed material in English and in Spanish for the agency's customers and applicants.

6. **Factor 2, Step 6: Operator surveys.**

Access' conducts ridership/customer surveys, as discussed in the section above, for the agency's customer population.

No other surveys are conducted at this time, by the individual service providers. Access' next customer survey will be conducted in 2019 with the intention of having these surveys to be conducted bi-annually.

C. **Factor 3: The Nature and Importance of the Program, Activity or Service Provided by the Program to People's Lives**

FTA Circular 4702.1B provides that for this factor of the analysis, “the more important the program, the more frequent the contact and likelihood that language services will be needed. The provision of public transportation is a vital service, especially for people without access to personal vehicles. . . . A person who is LEP may have a disability that prevents the person from using fixed route service, thus making the person eligible for ADA complementary paratransit. Transit providers, States and MPOs must assess their programs, activities and services to ensure they are providing meaningful access to LEP persons. Facilitated meetings with LEP persons are one method to inform the recipient on what the local LEP population considers to be an essential service, as well as the most effective means to provide language assistance.”

Access Services provides ADA paratransit transportation services for Los Angeles County for 45 fixed route operators and partner organizations in the County of Los Angeles.

Access customers are individuals who through an in-person evaluation have demonstrated that they have a disability (disabilities) which would make it challenging, if not impossible, for them to make use of fixed route transit services.

**Importance of Access Services’ Activities**
Access provides a unique and necessary service to its customers. For many of the agency’s customers, without the option of Access, their mobility would be severely restricted.

It is in recognition of the importance of the services that Access provides that the agency has developed a variety of language assistance features to assist LEP persons (both current paratransit customers and members of the public):

1) Telephone Interpreter Services – available 24 hours a day/7 days a week
2) Access website internal link with “Google Translate” service to translate webpage information.
3) Printed material available in Spanish (the most common language spoken by Access customers/Los Angeles County residents outside of English).

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

FTA Circular 4702.1B provides that for this section “Resource and cost issues can often be reduced by technological advances, reasonable business practices, and the sharing of language assistance materials and services among and between recipients, advocacy groups, LEP populations and Federal agencies. Large entities and those entities serving a significant number of LEP persons should ensure that their resource limitations are well substantiated before using this factor as a reason to limit language assistance.”

Access is committed to providing language assistance to LEP populations who need the service in order to receive the unique paratransit benefits that Access provides to Los Angeles County.

Access has incorporated a number of improvements into its service that ensure that LEP populations can receive information about Access.

Recent Access Improvements
Since the printing of Access’ 2011 Limited English Proficiency Plan, Access made at least two major changes to its program that improved access for LEP persons:

1) Access speaker-phone interpreter availability: At Access’ eligibility center, LEP applicants did not need to bring their own interpreter with them to the in-person interview, but rather the applicant and the applicant’s evaluator can proceed through
the in-person evaluation while having their conversation translated through a speaker-phone connection. Previously, it was attempted to have evaluators and applicants wear telephone headsets, however, that approach proved more problematic than the current approach of using a mobile speaker-phone.

2) **Access embedded a Google Translate link on Access website.** This feature was developed by Access to allow for all of the information Access makes public on its website to be capable of being reviewed in dozens of languages easily and by any LEP population wishing further information about Access, from its Rider’s Guide to Title VI complaint information.

If Access becomes aware of other areas where it should improve its methods of language assistance to LEP communities/persons, Access will develop such improvements.

Cost restrictions are ever-present during current periods of tight budget constraints, however, if there are improvements recommended by Access’ customers, Access’ partners or the FTA, Access will work to improve the services it provides to LEP persons.

If some – currently unknown – improvements turn out to be cost-prohibitive to institute, Access will work closely with its partners and FTA to determine a solution that will effectively meet the needs of LEP access and also not burden the agency’s budget and risk reducing the quality of its service throughout.

### III. **Language Assistance Plan**

FTA Circular 4702.1B requires that following the completion of the Four-Factor Analysis, the agency “shall use the results of the analyses to determine which language assistance services are appropriate” (FTA C 4702.1B, p. III-8).

There are a minimum of five (5) elements to the Language Assistance Plan spelled out in the FTA regulations. Those separate elements are addressed individually in the pages that follow.

#### A. **Include the Results of the Four-Factor Analysis, Including a Description of the LEP Population(s) Served.**
Access’ Four-Factor Analysis presented earlier in this report. Access provides paratransit transportation services throughout the County of Los Angeles following the fixed route service area of our 45 partners.

There are a great many LEP communities that are present in Los Angeles County. For a summary of the communities with LEP populations and which language groups have members who speak English less than ‘very well’ – as per U.S. Census terms – please see Table 2. The largest LEP communities in Los Angeles County are summarized in Table 3. Spanish is, by far the single largest non-English language spoken in Los Angeles County and also has the largest number of individuals who speak the English language less than ‘very well.’

B. Describe How the Recipient (Access) Provides Language Assistance Services by Language.

Access has a variety of language assistance services that were included as part of the Four-Factor Analysis. The following bullet-points summarize those services.

1) Telephone interpreter service available accessed by Access Services call center staff; provider staff; Eligibility and Eligibility appeals staff, which allows persons to communicate effectively even if a language barrier would exist without the interpreter service;
   In terms of the language assistance services by language, Access’ Language-Link telephone interpreter service offers interpreter services in over two hundred (200) languages. A list of the languages is available at Language-Link’s website at http://www.languageline.com/customer-service/languages/

2) “Google Translate” embedded feature on Access website. Information posted on the Access website can be viewed in English or – through a Google Translate link on the Access website – can be translated into any of dozens of languages, including the text of Access’ Rider’s Guide;
   In terms of the language assistance services by language, “Google Translate” allows Access’ web-based information to be translated into over seventy (70) different languages.

3) Speaker-phone translation available at Access’ Eligibility Center. If a customer arrives at CARE and does not speak either English or Spanish and does not have a translator to assist them, an in-person evaluation can still be conducted easily. Through a mobile speaker-phone, the evaluator and applicant can communicate through Access’ telephone interpreter service both in the evaluator’s office as well as out on the physical evaluation course;
With respect to the language assistance services by language, Access’ contracted telephone interpreter service (Language-Link) offers interpreter services in over two hundred (200) languages. A list of the languages is available at Language-Link’s website at [http://www.languageline.com/customer-service/languages/](http://www.languageline.com/customer-service/languages/).

4) Printed materials provided in English and Spanish. Access’ applications, Rider’s Guide, Community meeting announcements are provided in both English and Spanish (the most common language spoken by Access customers as well as County residents next to English);

C. **Describe How the Recipient (Access) Provides Notice to LEP Persons About the Availability of Language Assistance.**

Access has developed its language assistance programs to be virtually automated, so that the customer/member of the public need not search for the assistance.

1) With respect to use of the telephone interpreter service, if a person calls Access’ call center; one of Access’ service providers or goes to Access’ in-person eligibility center or the office of an eligibility appeals specialist, the call-taker or customer can identify the language they are speaking and the call-taker will then connect in with the telephone interpreter service after a brief hold period.

2) With respect to the “Google Translate” service embedded in Access’ webpage, which allows persons viewing Access’ website to translate information into any variety of languages, the “Choose Another Language” is on the left-hand side of Access’ homepage, so a customer can choose a language to translate information to as the first thing once they reach the internet page.

3) For customers of Access who must receive written information in Spanish or Braille, that language information is contained in Access’ customer information database, so future written communications will be provided to that individual in their preferred language format.

Access has attempted to develop a system in which a customer need not “seek out” language assistance, but that that assistance is already available for those members of the public, applicants and customers who need some language assistance in order to fully participate at Access.

D. **Describe How the Recipient (Access) Monitors, Evaluates and Updates the Language Access Plan.**

Access staff will perform semi-annual checks with respect to the most requested languages through the telephone interpreter service to ensure that Access’ does not need to develop new/different services for its customers, members of the public.
E. Describe How the Recipient (Access) Trains Employees to Provide Timely and Reasonable Language Assistance to LEP Populations

Similar to the response to “C” above, Access has worked to automate its language assistance services as much as possible. This not only applies to those customers, applicants and members of the public who call Access, but it also applies to the staff members at Access, its service providers and eligibility evaluators and appeals specialists who could reasonably expect to communicate with LEP persons.

As part of their overall training, call-takers are trained on how to access the telephone interpreter service and to effectively utilize that service to communicate with callers. Access and eligibility staff members are also trained on how to enter and review certain language information contained in the Access (Rider 360) database to ensure that correct written information is sent if a person can only receive Spanish language documents and/or Braille documents.

Access, provider and eligibility staff undergo training at the start of their employment and have periodic re-trainings at intervals set by their employer depending upon whether they are Access, provider or eligibility staff.

IV. Conclusion

Access has made a variety of improvements to its service to remove barriers that could prevent a person from receiving the benefits of ADA mandated paratransit transportation services. Access has worked to make access to language assistance programs as seamless as possible so that customers may receive the assistance as soon as they telephone Access or enter the agency’s website.

Access is always working to provide better service for its customers and welcomes suggestions from its customers, its partners and the FTA. Access understands the necessary and valuable service that it provides to persons with disabilities and strives to ensure that those who need and would rely on the service do not face barriers to receiving such benefits.
LIMITED ENGLISH PROFICIENCY PLAN

APPENDIX A
ACCESS SERVICE AREA MAP
This map shows the general service area for each region with Los Angeles County city borders. For a list of cities and neighborhoods included in each region, please refer to pages 35 - 37.

This information is subject to change and therefore cannot be used to determine whether an address is in our service area.

A color version of this map is available at our website at asla.org.
LIMITED ENGLISH PROFICIENCY PLAN

APPENDIX B

TABLE SUMMARY OF
PUBLIC MEETING/PUBLIC OUTREACH
LOCATIONS

(July 2017 to June 2019)
<table>
<thead>
<tr>
<th>Meeting Type</th>
<th>Region</th>
<th>Location</th>
<th>Date</th>
<th>Resource Days</th>
<th>Description</th>
<th>Attendee</th>
<th>Sponsor</th>
<th>Collaboration</th>
<th>Result</th>
</tr>
</thead>
<tbody>
<tr>
<td>West/Central</td>
<td>Jun-18</td>
<td>Norwalk</td>
<td>Apr-18</td>
<td>165</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Southern</td>
<td>Oct-18</td>
<td>Antelope Valley</td>
<td></td>
<td></td>
<td>Outreach Event</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Northern</td>
<td>Mar-18</td>
<td>Western</td>
<td>Apr-18</td>
<td>33</td>
<td>Special Education Resource Days</td>
<td></td>
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</tr>
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<td>Eastern</td>
<td>Jan-18</td>
<td>Southern</td>
<td>Jan-18</td>
<td>103</td>
<td>Outreach Event</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inglewood</td>
<td>Mar-18</td>
<td>Western</td>
<td>Mar-18</td>
<td>14</td>
<td>Outreach Event</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Eastern</td>
<td>Apr-18</td>
<td>Eastern</td>
<td>Apr-18</td>
<td>18</td>
<td>Outreach Event</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inglewood</td>
<td>May-18</td>
<td>Eastern</td>
<td>May-18</td>
<td>168</td>
<td>Outreach Event</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Western</td>
<td>Jun-18</td>
<td>Southern</td>
<td>Jun-18</td>
<td>94</td>
<td>Outreach Event</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Eastern</td>
<td>Jul-18</td>
<td>Eastern</td>
<td>Jul-18</td>
<td>97</td>
<td>Outreach Event</td>
<td></td>
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<td></td>
<td></td>
</tr>
<tr>
<td>Southern</td>
<td>Aug-18</td>
<td>Antelope Valley</td>
<td></td>
<td></td>
<td>Outreach Event</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Northern</td>
<td>Sep-18</td>
<td>Western</td>
<td>Sep-18</td>
<td>96</td>
<td>Outreach Event</td>
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<tr>
<td>Eastern</td>
<td>Sep-18</td>
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<td>Sep-18</td>
<td>93</td>
<td>Outreach Event</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

TABLE 5

<table>
<thead>
<tr>
<th>Location</th>
<th>Resource Days</th>
<th>Description</th>
<th>Attendee</th>
<th>Sponsor</th>
<th>Collaboration</th>
<th>Result</th>
</tr>
</thead>
<tbody>
<tr>
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<td>165</td>
<td>Outreach Event</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Eastern</td>
<td>33</td>
<td>Outreach Event</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>North Hollywood</td>
<td>14</td>
<td>Outreach Event</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Southern</td>
<td>18</td>
<td>Outreach Event</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Eastern</td>
<td>168</td>
<td>Outreach Event</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Southern</td>
<td>94</td>
<td>Outreach Event</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Eastern</td>
<td>97</td>
<td>Outreach Event</td>
<td></td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>Antelope Valley</td>
<td></td>
<td>Outreach Event</td>
<td></td>
<td></td>
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THROUGHOUT LOS ANGELES COUNTY
LIMITED ENGLISH PROFICIENCY PLAN

APPENDIX C

MAP OF
PUBLIC MEETING/PUBLIC OUTREACH
LOCATIONS
APPENDIX L

ELEMENTS OF FTA C 4702.1B

NOT-APPLICABLE TO ACCESS SERVICES
Access’ Title VI Report was prepared pursuant to FTA Circular 4702.1B Title VI Requirements and Guidelines for Federal Transit Administration Recipients and reflects the policies of Access Services.

Access Services is a public transit agencies designed to administer and manage the delivery of complementary Americans with Disabilities Act (ADA) paratransit service.

Access does not provide any fixed route services nor does its curb-to-curb transportation service require or utilize any station or depot facilities for passenger pick-ups and drop-offs.

**FTA C 4702.1B – Chapter IV – Does Not Apply to Access Services**

Chapter IV of FTA circular 4702.1B sets forth the guidelines for Fixed Route Transit Providers. Access Services, by its nature as a Paratransit provider, does not operate any fixed route bus or rail service. For this reason, Access’ Title VI requirements are contained exclusively in Chapter III (General Requirements and Guidelines). Access current Title VI Plan lists Access’ compliance with the General Requirements and Guidelines set forth in Chapter III of FTA circular 4702.1B.

**Equity Analysis Regarding Construction Projects – Does Not Apply to Access Services**

Access Services’ principal service is to provide curb-to-curb transportation to customers of its service. Access does not maintain public stations or depots for customers to transfer from one “route” to another and/or to board particular paratransit “routes."

Access also does not foresee any reason that it would become involved in overseeing the construction of any public transportation facility.

It is for the above reasons that discussion associated with Access’ equity analysis responsibilities associated with facility construction was not included in Access’ Title VI Plan as Access would not pursue the construction of a facility to aid our customers in accessing our transportation services.