

# TITLE VI 2026



# Introduction

This document was prepared by the Imperial County Transportation Commission (ICTC) and approved by the Commission in order to comply with Title VI of the Civil Rights Act of 1964, including new provisions detailed in U.S. Department of Transportation's FTA circular 4702.1B "Title VI Requirements and Guidelines for Federal Transit Administration Recipients" and pursuant to FHWA's 23 CFR Part 200 "Title VI Program and Related Statutes-Implementation and Review Procedures".

As a recipient of funds administered by the U.S. Department of Transportation, it is the policy of the Imperial County Transportation Commission to effectuate Title VI of the Civil Rights Act of 1964 as amended. It requires that no person 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 in any program or activity which is federally funded.

Prohibited practices include but are not limited to:

- Denying a person any service or benefit because of race, color, or national origin.
- Exclusion of federally funded services or programs.
- Providing a different service or benefit or providing services or benefits in a different manner.
- Locating facilities in any way that would limit or impede access to a federally funded service or benefit.
- Discrimination of any service or benefit of a person because of race, color, or national origin.

The Environmental Justice component of Title VI guarantees fair treatment for people of all races, and incomes regarding the development of environmental justice laws, regulations and policies.

Under Title VI, ICTC specifically seeks to:

- Ensure meaningful involvement of low-income and minority groups in the planning and decision-making processes.
- Safeguard low-income and minority groups against disproportionately high and adverse human health or environmental impacts of its programs, policies and activities.
- Ensure low income and minority groups are not excluded from participation in, denied the benefits of, or subjected to discrimination under federally funded programs and that they receive an equitable share of program benefits.

The Executive Director is responsible for initiating and monitoring Title VI activities, preparing required reports and ensuring that the Commission adheres to other compliance responsibilities as required by applicable regulations. ICTC's Title VI Plan provides the direction and program structure for ensuring the Commission's compliance with Title VI. Functional responsibility rests with ICTC staff and each and every transit provider under contract with ICTC. ICTC will not accept discrimination against any participant or beneficiary of ICTC programs or services by an employee or contractor in the performance of assigned duties, services or programs.

In the event ICTC distributes federal funds to another entity, the ICTC will monitor and ensure the compliance of each member agency and third party contractor at any tier and each sub-recipient at any tier under the project, with all requirements prohibiting discrimination on the basis of race, color, or national origin; and will include non-discrimination language in all written agreements.

Any person believing, they have been discriminated against based on race, color, or national origin in the provision of services, programs, activities, or benefits, may file a formal complaint directly with ICTC, Federal Highway Administration or with the Federal Transit Administration.



DAVID AGUIRRE, Executive Director



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# Regulatory Authority

Because Title VI is comprehensive in scope, it covers all an agency's federally funded programs or activities. This is the case because Title VI of the Civil Rights Act of 1964, as amended, provides that no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving Federal financial assistance.

The impact of Title VI has been further extended by the Civil Rights Restoration Act of 1987. The Civil Rights Restoration Act of 1987 broadened the scope of Title VI coverage by expanding the definition of terms "programs or activities" to include all programs or activities of federal aid recipients, sub-recipients, and contractors, whether such programs and activities are federally assisted or not [Pub. L. No. 100-259, 102 Stat. 28 (1988)]. Authorities and citations that espouse the requirements of Title VI include:

- *FHWA Title VI program requirements* (23 CFR Part 200)
- *Title VI Requirements and Guidelines For Federal Transit Administration Recipients*, FTA Circular 4702.1B, dated October 2012
- *Title VI of the Civil Rights Act of 1964*, as amended, 42 U.S.C. 2000 et seq.
- 49 United States Code 5332, *Nondiscrimination in Mass Transportation*
- Executive Order 12898, *Executive Order on Federal Actions To Address Environmental Justice in Minority Populations and Low-Income Populations*
- *Nondiscrimination In Federally-Assisted Programs –Title VI Of The Civil Rights Act Of 1964*, 49 Code of Federal Regulations Part 21
- *Nondiscrimination in Federally Assisted Programs – Implementation of Title VI of the Civil Rights Act of 1964*, 28 CFR Part 42, Subpart C
- *Guidelines for the Enforcement of Title VI of the Civil Rights Act of 1964*, 28 CFR 50.3
- *Civil Rights Restoration Act of 1987* (Public Law 100-259)

# **Imperial County Transportation Commission**

## **Title VI Program Policy**

### **Policy Statement**

ICTC is committed to ensuring that no person is excluded from participation in, denied benefits of, or otherwise subjected to discrimination under any of its programs, activities, or services on the basis of race, color, or national origin. All persons regardless of their citizenship or immigration status are covered under this policy. In addition, ICTC prohibits discrimination on the basis of race, color or national origin in employment and business opportunities when such practices are related to or affect the delivery of federally funded programs, services, or benefits.

As a Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) fund recipient, ICTC will ensure that its program policies and activities comply with the Department of Transportation (DOT) Title VI regulations of the Civil Rights Act of 1964.

ICTC will ensure that the level and quality of its services and programs are provided without regard to race, color, or national origin.

ICTC will ensure meaningful involvement of all affected persons, including minority and low-income population, in the development of policies, programs, and decision-making processes. ICTC will promote the participation of all affected populations in any decision or policy making process.

ICTC will ensure that Limited English Proficient (LEP) individuals have access to ICTC's programs, activities, and services. ICTC will develop and implement a Language Assistance Plan (LAP) to ensure meaningful access to its programs, activities, and services for individuals with Limited English Proficiency (LEP).

### **Applicability**

This policy is applicable to all ICTC employees, contractors, consultants, and subrecipients performing work on behalf of ICTC. The policy also protects members of the public who participate or benefit from ICTC programs, activities and services. Failure of an ICTC employee to comply with this policy and its procedures may result in disciplinary action up to and including employment termination.

### **Administration of the Regulation**

ICTC will integrate the provisions of the Title VI program into all program's activities and services. Federally funded contracts will include Title VI program language.

# ICTC's Title VI Notice to the Public

Title VI of the Civil Rights Act of 1964 protects people from discrimination based on race, color or national origin in programs and activities receiving Federal financial assistance. Any person who feels they have been discriminated against with respect to transit services or benefits on the basis of race, color, or national origin may file a written complaint with the Imperial County Transportation Commission.

For more information or to file a complaint, you may contact the Title VI Program Coordinator, Michelle Bastidas at (760) 592-4494; or by email: [michellebastidas@imperialctc.org](mailto:michellebastidas@imperialctc.org); or visit ICTC at:

**Imperial County Transportation Commission**  
1503 N. Imperial Ave. Suite 104  
El Centro, Ca. 92243  
[www.imperialctc.org/policies/title-vi](http://www.imperialctc.org/policies/title-vi)

Complaints may also be filed directly with the Federal Highway Administration (FHWA) and/or Federal Transit Administration (FTA). FTA recommends, but does not require, that individuals first file a complaint directly with their transit provider to give it an opportunity to resolve the situation. Complaints may be filed in writing or online:

<https://highways.dot.gov/civil-rights/title-vi-complaint>

<https://ftawebprod.fta.dot.gov/OCF/OnlineComplaintForm/CreateOnlineComplaintForm>

Complaints also may be filed directly with the Federal Highway Administration (FHWA) and/or Federal Transit Administration (FTA) via Complaint Form:

<https://highways.dot.gov/civil-rights/how-file-external-or-internal-program-complaint-under-americans-disabilities-act>

<https://www.transit.dot.gov/sites/fta.dot.gov/files/2022-11/Civil-Rights-Complaint-Form-Alternate.pdf>

**Federal Highway Administration**  
U.S. Department of Transportation  
Office of Civil Rights  
1200 New Jersey Avenue, SE  
8th Floor E81-105  
Washington, DC 20590

**Federal Transit Administration**  
Office of Civil Rights  
Attention: Complaint Team  
East Building, 5<sup>th</sup> Floor-TCR,  
1200 New Jersey Ave., SE  
Washington, DC 20590

Título VI de la Ley de Derechos Civiles de 1964, asegura que “Ninguna persona en los Estados Unidos, debido a su raza, color u origen nacional, será excluida de participar, ni se le negarán los beneficios, o será objeto de discriminación, en cualquier programa o actividad que reciba ayuda financiera federal”. Los estatutos federales relacionados y la ley estatal refuerzan estas protecciones para incluir el sexo, la discapacidad, la religión, la orientación sexual y la edad. Cualquier persona que considere que ha sido discriminada de los servicios de tránsito o programas debido a su raza, color, u origen nacional, puede presentar una denuncia por escrito a la Comisión de Transporte del Condado de Imperial.

Para más información o para someter una denuncia, debe contactar al Coordinador del Programa Titulo VI, Michelle Bastidas al número (760) 592-4494; o por correo electrónico a [michellebastidas@imperialctc.org](mailto:michellebastidas@imperialctc.org); o en persona al:

**Imperial County Transportation Commission**  
1503 N. Imperial Ave. Suite 104  
El Centro, Ca. 92243  
[www.imperialctc.org/policies/title-vi](http://www.imperialctc.org/policies/title-vi)

Las denuncias también pueden ser sometidas directamente con La Administración Federal de Carreteras (FHWA) o la Administración Federal de Tránsito (FTA). FTA recomienda, aunque no lo exige, que las personas presenten primero una denuncia directamente ante su proveedor de transporte para darle la oportunidad de resolver la situación. Las denuncias pueden ser sometidas en escrito o en línea:

<https://highways.dot.gov/civil-rights/title-vi-complaint>

<https://ftawebprod.fta.dot.gov/OCF/OnlineComplaintForm/CreateOnlineComplaintForm>

Las denuncias también pueden ser entregadas directamente con la Administración Federal de Carreteras (FHWA) o la Administración Federal de Tránsito (FTA) llenando el Formulario Para Denuncia.

<https://highways.dot.gov/civil-rights/how-file-external-or-internal-program-complaint-under-americans-disabilities-act>

<https://www.transit.dot.gov/sites/fta.dot.gov/files/2022-11/Civil-Rights-Complaint-Form-Alternate.pdf>

**Federal Highway Administration**  
U.S. Department of Transportation  
Office of Civil Rights  
1200 New Jersey Avenue, SE  
8th Floor E81-105  
Washington, DC 20590

**Federal Transit Administration**  
Civil Rights Division  
Attention: Complaint Team  
East Building, 5<sup>th</sup> Floor-TCR,  
1200 New Jersey Ave., SE  
Washington, DC 20590

## List of Locations Where the Title VI Notice is Posted

ICTC's Title VI notice to the public is currently posted at the following locations:

Location Name	Address	City
ICTC Offices	1503 N. Imperial Ave., Suite 104	El Centro, CA. 92243
website	<a href="http://www.imperialctc.org">www.imperialctc.org</a>	
website	<a href="http://www.ivtransit.com">www.ivtransit.com</a>	
website	<a href="http://www.ivtaccess.org">www.ivtaccess.org</a>	
website	<a href="http://www.ivtridenow.com">www.ivtridenow.com</a>	
website	<a href="http://www.ivtmedtrans.com">www.ivtmedtrans.com</a>	
IVT bus operations facilities	792 E. Ross Rd.	El Centro, CA. 92243
IVT Rider's Guidebook	N/A	
IVT Ride Now Brochure	N/A	
IVT MedTrans Brochure	N/A	
IVT Access Brochure	N/A	

# Title VI Complaint Procedure

## TITLE VI DISCRIMINATION COMPLAINT PROCEDURES (ENGLISH)

### General

Title VI of the Civil Rights Act of 1964, ensures “No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.” Any person who believes they have been discriminated against with respect to transit services or benefits on the basis of race, color, or national origin may file a Title VI complaint with the Imperial County Transportation Commission. Complainants may also file an online or written complaint directly with the Federal Transit Administration (FTA). FTA recommends, but does not require, that individuals first file a complaint directly with their transit provider to give it an opportunity to resolve the situation.

Related federal statutes and state law further those protections to include sex, disability, religion, sexual orientation, and age. Any person that believes they have been discriminated against on bases other than race, color, or national origin will be referred to the appropriate complaint or grievance process.

### Complaint Procedures

Complaints alleging discrimination on the basis of race, color, or national origin may be submitted to the Title VI Coordinator of the Imperial County Transportation Commission, 1503 N. Imperial Ave Suite 104, El Centro, CA 92243. Every effort will be made to obtain early resolution of complaints.

1. The complaint must meet the following requirements:
  - a. The complaint shall be in writing and signed by the Complainant(s). If the Complainant cannot complete a written statement, a verbal complaint may be made. The Title VI Coordinator will interview the Complainant and assist the person in converting the verbal complaint to writing. All complaints must be signed by the Complainant or his/her/their representative.
  - b. The Complaint must contain information about the alleged discrimination such as name, address, phone number of complainant(s), location, date and description of the issue. The description of the alleged act of discrimination or disparate treatment should include, as appropriate: type or name of service, bus number, location (city/streets) date and time of day, employee name, position or badge number if available, and any person(s) involved or witnesses to the incident.
  - c. Per federal law the complaint must be filed within 180 days of the alleged incident.
  - d. The complaint should be submitted to:  
Imperial County Transportation Commission  
Attn: Michelle Bastidas, Title VI Coordinator  
1503 N. Imperial Ave., Suite 104, El Centro CA, 92243  
Office: (760) 592-4494

Fax: (760) 592-4410  
E-mail address: [michellebastidas@imperialctc.org](mailto:michellebastidas@imperialctc.org)

2. The ICTC Title VI coordinator will acknowledge receipt of the complaint in writing within ten (10) working days.
3. The ICTC Title VI coordinator will maintain a log of all Title VI complaints identifying complainant's name, date, nature of the complaint, and basis for the discrimination complaint based on a protected class. Coordinator will maintain a list of formal complaints received that will include status and resolution.
4. The ICTC Title VI coordinator will forward the formal complaint to Caltrans for investigation (FHWA) or to the Office of Civil Rights (FTA).

### **Investigation of Complaints**

The Title VI Coordinator will review all complaints to determine if there is sufficient merit to warrant investigation. In some cases, there may be a written request to the complainant to provide additional information. If a complaint is found to have sufficient merit to warrant investigation, the Title VI Coordinator will proceed with an investigation. If the complaint does not warrant investigation, the Title VI Coordinator will then respond within thirty (30) working days to the Complainant and so state.

A complaint can be rejected or dismissed for the following reasons:

1. The complaint is filed past the 180 days of the alleged occurrence.
2. The complaint is not signed or is anonymous.
3. The Complainant fails to respond to repeated requests for additional information.
4. The Complainant cannot be located.
5. The Complainant requests the withdrawal of the complaint.

### **Disposition of Complaints**

A written determination as to the validity of the complaint and a description of the resolution, if any, shall be issued by the Title VI Coordinator and a copy forwarded to the Complainant no later than sixty (60) calendar days after its filing.

A recommendation will be made by the Title VI Coordinator and will be subject to review by the ICTC Executive Director and ICTC Legal Counsel.

In the event that the ICTC or its federally funded contractors and consultants are in non-compliance with the Title VI regulations, remedial actions will be noted.

The notice of the determination will be mailed to the Complainant. Notice shall include information on appeal rights and instructions for initiating an appeal.

A copy of the complaint and the Title VI Coordinator's report shall be issued to the FTA/FHWA within 120 days of receipt of the complaint.

A summary of the complaint, the finding or resolution, will be included as a part of the Title VI updates to the FTA/FHWA.

## **Appealing Disposition of Complaints**

Complainants that are not satisfied with the disposition of the complaint may appeal to the Executive Director.

1. The appeal should be made with the Title VI Coordinator within ten (10) working days of the date of the resolution.
2. The Executive Director will acknowledge receipt of the appeal in writing within ten (10) working days of receiving the request for appeal.
3. The Executive Director may make a final determination or may choose to refer the matter to the Commission for final action.
4. The resolution and/or referral to the Commission will be communicated to the complainant. The Commission's decision will be communicated to the Complainant and/or his/her/their designee in writing.

## **Record Keeping Requirements**

The Title VI Coordinator shall maintain a record of each complaint and appeal, the ICTC's response(s), and steps taken to resolve the complaint. The individual's right to a prompt and equitable resolution of a complaint will not be impaired by his/her/their pursuit of other remedies. The use of this grievance process is not a prerequisite to the pursuit of other remedies.

## **Filing Title VI Discrimination Complaints with the Federal Transit Administration or Federal Highway Administration**

Individuals may also file Title VI discrimination complaints with the Federal Transit Administration or the Federal Highway Administration. The Federal Transit Administration's Complaint Procedure is contained in the FTA Circular C4702.1B and the Federal Highway Administration Complaint Procedure is contained in the FHWA Guidance Memorandum, *Processing of Title VI Complaints*.

### **Additional Resources**

#### **Federal Transit Administration**

Office of Civil Rights  
Attention: Complaint Team  
East Building, 5<sup>th</sup> Floor-TCR,  
1200 New Jersey Ave., SE  
Washington, DC 20590

#### **Federal Highway Administration**

U.S. Department of Transportation  
Office of Civil Rights  
1200 New Jersey Avenue, SE  
8<sup>th</sup> Floor E81-105  
Washington, DC 20590

<https://www.transit.dot.gov/title6>

<https://dot.ca.gov/programs/civil-rights/title-vi>

[https://www.fhwa.dot.gov/civilrights/programs/title\\_vi/](https://www.fhwa.dot.gov/civilrights/programs/title_vi/)

# Title VI Complaint Procedures

## TITLE VI DISCRIMINATION COMPLAINT PROCEDURE (SPANISH)

### PROCEDIMIENTO PARA PRESENTAR UNA DENUNCIA DE DISCRIMINACION DE TITULO VI

#### General

Título VI de la Ley de Derechos Civiles de 1964, asegura que “Ninguna persona en los Estados Unidos, debido a su raza, color u origen nacional, será excluida de participar, ni se le negarán los beneficios, o será objeto de discriminación, en cualquier programa o actividad que reciba ayuda financiera federal”. Los estatutos federales relacionados y la ley estatal refuerzan estas protecciones para incluir el sexo, la discapacidad, la religión, la orientación sexual y la edad. Cualquier persona que considere que ha sido discriminada de los servicios de tránsito o programas debido a su raza, color, u origen nacional, puede presentar una denuncia por escrito a la Comisión de Transporte del Condado de Imperial. Las denuncias también pueden ser sometidas directamente con la Administración Federal de Tránsito (FTA). La FTA recomienda, aunque no es obligatorio, que el reclamante someta la denuncia directamente con el proveedor de servicios de tránsito para dar oportunidad de resolver la situación.

#### Procedimientos de Denuncia

Denuncias de presunta discriminación en la base de raza, color, u origen nacional pueden ser enviadas al Coordinador del Título VI de la Comisión de Transporte del Condado de Imperial, 1503 N. Imperial Ave., Suite 104, El Centro, CA 92243. Todo esfuerzo será hecho para obtener resolución temprana de las denuncias.

1. La denuncia debe tener los requisitos siguientes:
  - a. La denuncia debe ser escrita y firmada por el reclamante. En caso de que el reclamante no pueda completar una declaración por escrito, una denuncia verbal puede ser aceptada. El Coordinador del Título VI entrevistará al reclamante y ayudará a la persona a convertir la denuncia verbal en escrito. Todas las denuncias deben ser firmadas por el Reclamante o su representante.
  - b. La denuncia debe contener información sobre la discriminación pretendida como nombre, dirección, número de teléfono del reclamante, y de la ubicación, la fecha y la descripción del incidente. La descripción del acto pretendido de discriminación o trato desigual debe incluir: tipo o nombre de servicio, número de camión, la ubicación (la ciudad/calles) la fecha y la hora, nombre del empleado, posición o insignia si está disponible, y cualquier persona involucrada o los testigos al incidente.
  - c. Por la ley federal la denuncia debe ser presentada dentro de 180 días siguientes del incidente en cuestión.
  - d. La denuncia debe ser sometida a:  
Comisión de Transporte del Condado de Imperial (ICTC)  
Con atención a: Michelle Bastidas, Coordinador del Título VI  
1503 N. Imperial Ave., Suite 104, El Centro, CA 92243

Oficina: (760) 592-4494  
Fax: (760) 592-4410  
Correo electrónico: [michellebastidas@imperialctc.org](mailto:michellebastidas@imperialctc.org)

2. El Coordinador del Título VI de ICTC reconocerá recibo de la denuncia por escrito dentro de diez (10) días hábiles.
3. El Coordinador del Titulo VI de ICTC mantendrá un registro con todas las denuncias que incluirá el nombre del reclamante, fecha, el tipo de denuncia, y la base por la discriminación basada en un grupo protegido. El coordinador mantendrá una lista de denuncias formales recibidas que incluirá el estatus y la resolución.
4. El Coordinador del Titulo VI de ICTC enviará la denuncia formal a Caltrans para su investigación (FHWA) o a la Oficina Departamental de Derechos Civiles de la Administración Federal de Transporte (FTA).

### **Investigación de Denuncias**

El Coordinador del Título VI revisará todas las denuncias para determinar si hay méritos suficientes para justificar una investigación. En algunos casos podría haber una petición por escrito al reclamante para proporcionar información adicional. Si la denuncia encuentra mérito suficiente para justificar investigación, el Coordinador de Titulo VI continuará con una investigación. Si la denuncia no justifica investigación, el Coordinador de Título VI responderá dentro de treinta (30) días hábiles al reclamante.

La denuncia puede ser rechazada o desestimada por las siguientes razones:

1. La denuncia es presentada después de los 180 días del incidente.
2. La denuncia no es firmada o es anónima.
3. El Reclamante falla a responder a la petición repetida de información adicional.
4. El Reclamante no puede ser localizado.
5. El Reclamante solicita retirar la denuncia.

### **Disposición de Denuncia**

Una determinación por escrito sobre la validez de la denuncia y una descripción de la resolución, en su caso, será emitida por el Coordinador del Título VI y se enviará una copia al reclamante dentro de sesenta (60) días hábiles después de su presentación.

Una recomendación será hecha por el Coordinador de Título VI y será revisada por el Director Ejecutivo de ICTC y la Asesoría Legal de ICTC.

En caso de que ICTC, sus contratistas y/o consultores que son financiados federalmente no estén en conformidad con las regulaciones del Título VI, acciones correctivas serán tomadas.

El aviso de la determinación será enviado al Reclamante. El aviso incluirá información en derechos de apelación e instrucciones para iniciar una apelación.

Una copia de la denuncia y del reporte del Coordinador de Titulo VI será publicado al FTA/FHWA dentro de ciento veinte (120) días de haber recibido la denuncia.

Un resumen de la denuncia, el hallazgo o la resolución serán incluidos como una parte de las actualizaciones de Título VI al FTA/FHWA.

## **Apelación de Disposición de Denuncias**

Los reclamantes que no sean satisfechos con el resultado de la denuncia pueden apelar al Director Ejecutivo.

1. La apelación debe ser presentada por medio del Coordinador de Título VI dentro de diez (10) días hábiles de la fecha de la resolución.
2. El Director Ejecutivo notificara haber recibido la apelación dentro de diez (10) días hábiles de recibir la petición para apelación.
3. El Director Ejecutivo puede hacer una determinación final o puede referirse el asunto a la Comisión para la acción final.
4. La resolución y/o la referencia a la Comisión serán comunicadas al reclamante. La decisión de la Comisión será comunicada por escrito al reclamante y/o a su designado.

## **Requisitos para el Mantenimiento de Registros**

El Coordinador del Título VI llevará un registro de cada denuncia y apelación, la respuesta de ICTC, y las medidas adoptadas para resolver la denuncia. El derecho del individuo a una resolución pronta y equitativa de una denuncia no se verá afectada por su búsqueda de otros recursos. El uso de este proceso de denuncia no es un requisito previo para la búsqueda de otros recursos.

## **Presentación de Denuncia de discriminación de Titulo VI a la Administración Federal de Tránsito**

Individuos también pueden presentar denuncias de discriminación Título VI a la Administración Federal de Tránsito. El procedimiento de demanda de la Administración Federal de Tránsito está contenido en el FTA Circular C4702.1B y el procedimiento de demanda de La Administracion Federal de Carreteras esta contenido en FHWA Guidance Memorandum, *Processing of Title VI Complaints*.

### **Recursos Adicionales**

#### **Federal Transit Administration**

Office of Civil Rights  
Attention: Complaint Team  
East Building, 5<sup>th</sup> Floor-TCR,  
1200 New Jersey Ave., SE  
Washington, DC 20590

#### **Federal Highway Administration**

U.S. Department of Transportation  
Office of Civil Rights  
1200 New Jersey Avenue, SE  
8<sup>th</sup> Floor E81-105  
Washington, DC 20590

<https://www.transit.dot.gov/title6>

<https://dot.ca.gov/programs/civil-rights/title-vi>

[https://www.fhwa.dot.gov/civilrights/programs/title\\_vi/](https://www.fhwa.dot.gov/civilrights/programs/title_vi/)

# **PUBLIC PARTICIPATION PLAN FOR TITLE VI**

ICTC and sub-recipients are required to ensure a proactive public involvement process that assures meaningful opportunity for all members of the public, including minority and low-income populations, transit dependent individuals, older adults, persons with disabilities, and individuals with limited English proficiency, to be involved in all phases of the regional planning process by providing complete information, timely public notice, opportunities for making comments, full access to key decisions, and early and continuing involvement in developing transportation plans and programs while ensuring compliance with applicable civil rights and nondiscrimination requirements. When the public is engaged in the process, their feedback helps assure projects address community needs. An agency's public participation strategy shall offer continuous opportunities for the public to be involved in the identification of social, economic, and environmental impacts of proposed transportation decisions.

ICTC will continue to employ the following measures to seek out and consider the viewpoints of minority, low-income, and LEP populations in the course of conducting public outreach and involvement activities. These measures are adopted from the ICTC Public Participation Plan and also in the Title VI Program. The public outreach and involvement activities listed below were also undertaken since the last Title VI Program report and shall remain in place to ensure that minority, low-income and LEP people have meaningful access to these activities.

1. Bilingual (English & Spanish) information operators are available to respond to customers calling the ICTC and transit service information lines.
2. Bilingual (English & Spanish) staff is available to answer telephone inquiries for ICTC ADA certification interviews and ADA paratransit scheduling.
3. Bilingual (English & Spanish) staff will perform the ADA certification interview as requested, or if the interview scheduler believes that it would be necessary or beneficial.
4. The following materials shall be available in both English and Spanish: (1) ADA Certification Brochure; (2) ADA Certification Application; (3) IVT Riders Guides (4) Disabled Transit Services information.
5. ICTC shall provide bilingual (English & Spanish) language media advertising as part of the countywide transit marketing program.
6. The websites for ICTC and the transit services shall be in bilingual format; [www.imperialctc.org](http://www.imperialctc.org), [www.ivtransit.com](http://www.ivtransit.com), [www.ivtaccess.com](http://www.ivtaccess.com) [www.ivtridenow.com](http://www.ivtridenow.com), [www.ivtmedtrans.com](http://www.ivtmedtrans.com)
7. Bilingual (English & Spanish) staff is available at public meetings, workshops, public hearings and Commission meetings and committees.
8. Interpretation services may be contracted for public meetings upon timely requests.

9. Public meetings conducted via Zoom may provide auto-translation of captions when requested.

## Board Selections

ICTC Board is currently composed of ten voting members and one non-voting member consisting of two members of the Imperial County Board of Supervisors; one member from each incorporated city (seven) within Imperial County who shall be the mayor of the city or a member of its city council; one member of the Board of Directors of the Imperial Irrigation District; and, one non-voting member appointed by the Governor representing the California Department of Transportation (Caltrans).

In the future the governing Board of the commission may also include the following ex-officio or non-voting members: one member representing the State of Baja California, Mexico, who may be appointed by the governor of the state; one member representing the municipality of Mexicali, Mexico, who may be the mayor or his or her designee; one member representing the Consul of Mexico in Calexico, California, who may be the consul or his or her designee; and, one member representing any federally recognized Native American tribe in Imperial County.

The Public Works TAC makes technical recommendations to ICTC regarding regional issues including transportation, solid waste, development, and regional funding apportionments. The Committee is made up of Public Works Directors from each of the seven cities and County, and a representative from the Imperial Irrigation District.

The SSTAC membership is appointed by ICTC per the tenets of PUC 99238. The Council serves three-year terms and drawn from members and agencies within the community. The SSTAC addresses the mobility needs of the community including; transit-dependent, the elderly and the disabled.

**Table depicting the membership of non-elected committees and councils as of January 2026:**

Committee / Body	African American	Asian American	Caucasian	Latino	Native American	Other
ICTC Technical Advisory Committee (TAC)		1	5	9		
ICTC Social Services Transportation Advisory Council (SSTAC)			3	8		
ICTC Management Committee			6	4		

## **Outreach Efforts to Encourage Participation**

ICTC values the ethnic and cultural diversity of the public it serves in Imperial County and is committed to ensuring the meaningful involvement of minority, low-income, and other traditionally underrepresented populations in its programs, committees, and decision making processes.

ICTC actively seeks and encourages participation from underrepresented populations in its non-elected committees when vacancies occur. Outreach efforts include announcements at Board and Committee meetings, direct outreach through Board and Committee members to their constituents, posting of informational notices at ICTC facilities, and publication of vacancy announcements on ICTC's website and social media platforms. Groups on its non-elected committees when filing a vacancy.

In addition, ICTC conducts outreach to community-based organizations, advocacy groups, and service providers that work with minority, low-income, and Limited English Proficiency (LEP) populations to share information about participation opportunities and public involvement activities.

To support meaningful access, ICTC provides language assistance upon request, including translated materials and interpretation services for public meetings, consistent with its Language Assistance Plan. ICTC staff at public meetings are bilingual and all ICTC public meetings currently have a virtual participation option.

ICTC documents its outreach efforts, including methods used and populations reached, and periodically evaluates the effectiveness of these strategies to identify opportunities for improvement.

For any major service changes, planning activities and public hearings, ICTC ensures inclusive participation.

## **Summary of Outreach Efforts Made Since Last Title VI Documentation Submission**

Over the last reporting period, ICTC conducted the following public outreach and involvement activities:

### **Printed Bus Schedules and Transit Information on the website.**

All public bus schedules and the Riders Guides include Spanish sections and information is available on the IVT, IVT Access, IVT Ride NOW, IVT MedTrans websites. All transit printed materials are made available in English and Spanish.

### **Bilingual Outreach:**

Bilingual assistance is utilized in outreach programs when needed and appropriate. ICTC conducts on-going advertising and public hearing notices in a bilingual format. All social media posts are posted both in English and Spanish. Some of the major marketing outreach efforts include Veterans Day and Stuff-a-Bus campaigns. In addition, the recent studies were done that included public outreach:

### **IVT Ride Transition to IVT Ride NOW**

IVT Ride dial-a-ride for seniors was transitioned to a general public IVT Ride NOW service that still provides priority to the senior population. A transition necessary due to declining ridership, now service like micro-transit. A comprehensive bilingual outreach took place for the modifications. ICTC staff developed a plan to conduct outreach including in-person presentations and surveys to the public regarding the service modifications. Presentations were held to key stakeholders and the city councils of the affected communities.

### **New Border Express Route**

An implementation of a demonstration route that services the Calexico East Port of Entry. Multiple bi-lingual transit stop visits, handouts of informational flyers, social media posts, and workshops were held to communicate the new transit service.

### **New Calexico Microtransit Service – Calexico On Demand**

An implementation of a demonstration microtransit route that services the City of Calexico. The service operates as an on-demand service available to provide trips to the general public within the City of Calexico. Bi-lingual marketing information was developed and extensive outreach was provided to allow the community to learn about this new transit service.

### **Free Fares Program**

A grant was obtained by ICTC to offer its riders free fares. Bi-lingual outreach for the free fares programs was created and implemented.

### **Transit Comprehensive Operational Analysis**

A study to review the existing transit services and identify the improvements needed for creating a better bus system for the County. The study is looking to improve the service and attract new riders. An extensive outreach effort has been conducted including various stakeholder's workshops and city council presentations. Transit stops visits have been conducted throughout the transit system, and five large community outreach events. All outreach efforts have been bi-lingual.

### **Unmet Transit Needs Public Hearing**

Surveys for the annual Unmet Transit Needs Public Hearings are available online both in Spanish and English. Furthermore, surveys are distributed at transfer terminals in Spanish and English as well. The agenda for the hearing is also printed in both languages for the public attending the hearing.

### **Phone Access**

A bilingual receptionist is available to answer phone inquiries for Spanish speaking customers during business hours. The ICTC phone system currently includes a Spanish option on the ICTC's

recorded greeting. After business hours inquiries can be left on the bilingual voice mail and are responded to promptly the next business day.

All IVT and IVT Access dispatchers, reservationists and drivers are bilingual and able to provide monolingual speaking guests with information on public transit services.

### **Mobility Staff**

All of our mobility staffing are bilingual and able to inform LEP riders on public transit services.

### **Marketing**

All of our brochures and guides for the services, IVT, IVT Access, IVT Ride NOW, and IVT MedTrans come in both Spanish and English. Polls and surveys conducted electronically are available in both English and Spanish.

# Access for Persons with Limited English Proficiency (LEP)

## Introduction

Many individuals in the United States read, write, speak and understand English. However, there are many individuals whose primary language is not English. Individuals who do not speak English as their primary language and who have a limited ability to read, write, speak or understand English can be Limited English Proficient, or “LEP.” This language barrier may prevent individuals from accessing services and benefits.

There are federal civil rights requirements that provide the foundation for the development of an LEP plan. Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of national origin in programs and activities receiving federal financial assistance. In some circumstances, failure to ensure that LEP persons can effectively participate in federally assisted programs may constitute discrimination based on national origin under Title VI.

To comply with Title VI and its implementing regulations, agencies must take reasonable steps to ensure meaningful access to programs and services for persons with limited English proficiency.

The U.S. Department of Transportation has issued policy guidance clarifying recipients' responsibilities to LEP persons under Title VI, including the use of a four-factor analysis to determine appropriate language assistance measures.

## Four Factor Analysis

The U. S. Department of Transportation (DOT) issued its *Policy Guidance Concerning Recipient's Responsibilities to Limited English Proficient (LEP) Persons* [Federal Register: December 14, 2005 (Volume 70, Number 239)]. This policy states that DOT recipients are required to take reasonable steps to ensure meaningful access to programs by LEP persons. This coverage extends to the recipient's entire program. There are four factors for agencies to consider when assessing language needs and determining what steps they should take to ensure access for LEP persons:

- The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity or service of the recipient;
- The frequency with which LEP individuals come in contact with the program;
- The nature and importance of the program, activity or service provided by the recipient to people's lives;
- The resources available to the recipient and costs.

A brief description of the self-assessment undertaken in each of these areas follows.

**1. The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity or service.**

Spanish speakers are the category of LEP persons likely to be encountered by Imperial Valley Transit (IVT) and ADA Paratransit services. For Imperial County, the Census 2020 information shows that the total population is 179,702. Of that number 85% or 153,027 are reported to be of Hispanic or Latino descent.

According to the 2023 American Community Survey (ACS) 5 Year Estimates for Imperial County (conducted by the US Census Bureau) also indicates that persons who speak only English at home comprise 24.9% of persons in the County of Imperial. While those that speak Spanish are estimated to be at 73.7%.

These percentages show a slight decrease in English speakers and a slight increase in Spanish speakers from the prior ACS survey data.

**2. The frequency with which LEP individuals come in contact with the program.**

ICTC staff in conjunction with IVT and the ADA Paratransit operator staff have assessed the frequency at which staff has or could possibly have contact with LEP persons. This includes examining census data, phone inquiries, requests for translated documents, and staff feedback. Census data, as well as empirical data indicate that there is a fairly large percentage of the general population who are Spanish-speaking persons. As a public transportation provider, it is necessary to recognize this large segment of the general population. Phone inquiries and staff feedback also indicate that Spanish-speaking LEP persons have regular contact with the service.

**3. The nature and importance of the program, activity or service provided by the recipient to people's lives.**

Public transportation is vital to many people's lives. According to the Department of Transportation's *Policy Guidance Concerning Recipient's Responsibilities to Limited English Proficient (LEP) Persons*, "Providing public transportation access to LEP persons is crucial. An LEP person's inability to utilize effectively public transportation may adversely affect his or her ability to obtain health care, or education, or access to employment."

**4. The resources available to the recipient and costs.**

ICTC staff have also assessed their available resources that could be used to provide language assistance. This included identifying bilingual staff, review of contract for professional translation services, determining which documents should be translated, reviewing language of transit services websites and deciding what level of staff training is needed. After analyzing the four factors outlined in U. S. DOT policy guidance, ICTC staff developed the following plan for providing language assistance to LEP persons.

## **Components of the Plan**

There are five areas that comprise ICTC's LEP plan:

- Identifying LEP individuals who need language assistance
- Language assistance measures
- Training staff
- Providing notice to LEP persons
- Monitoring and updating the LEP plan

### **1. Identifying LEP individuals who need language assistance**

As stated above, the Census 2020 and American Community Survey data show that Spanish-speaking LEP persons are the group requiring language assistance. This information can also be used to identify concentrations of LEP persons within the service area. There are nine zip code areas with a high percentage of LEP persons 92231, 92243, 92244, 92250, 92251, 92227. Higher percentages of LEP persons can also be identified more accurately by census tracts.

In general, there are higher populations of LEP persons on the southern areas of the County of Imperial, in immediate proximity to the international border with Mexico. Identifying concentrations of LEP persons helps to ensure that they receive the necessary language assistance measures. There are also several measures that can be taken to identify individual persons who may need language assistance:

- When public meetings are held, a sign-in table is set up to have a staff member greet and briefly speak to each attendee in order to informally determine his/her/their ability to speak and understand English. In which case they can be offered language assistance.
- Notices are posted of available language assistance at public meetings to encourage LEP persons to self-identify.
- All public meeting agendas include the following language, “In compliance with the Americans with Disabilities Act, Government Code Section 54954.2, Executive Order N-29-20, and the Federal Transit Administration Title VI, please contact the Secretary to the Commission at (760) 592-4494 if special assistance is needed to participate in a Commission meeting, including accessibility and translation services. Assistance is provided free of charge. Notification of at least 48 hours prior to the meeting time will assist staff in assuring reasonable arrangements can be made to provide assistance at the meeting.”

### **2. Language assistance measures**

There are several language assistance measures available to LEP persons, including both oral and written language services. There are also various ways in which ICTC staff responds to LEP persons, whether in person, by telephone or in writing. Oral language services include bilingual front-line staff for ICTC receptionist, office assistant, office technician and Mobility

Coordination staff, as well as, at community presentations and events. Professional interpreters are available upon request for a variety of presentations and events. Bi-lingual staff and outreach consultants are present when doing any marketing or informational outreach for the transit services. Interpretation services for virtual public meetings are also available upon request.

In addition to these oral language services, written language services are available. Documents that are determined to be available for the general public are translated to Spanish. Vital documents are *defined as those documents without which a person would be unable to access services*. The following are written communications that are printed in both Spanish and English:

- Public Notices and Public Service announcements
- Interior bus posters and stickers displaying safety or system information
- Fare cards on fare boxes
- Onboard surveys
- Rider's guides
- Notices of service changes
- Marketing materials such as special events for transit services

There are several measures in place to respond to LEP individuals. Bus operators, who are the most direct point of contact for LEP persons, have several methods to respond to an LEP individual. Many bus drivers are bilingual; however, if the bus driver operator is not bilingual, they are instructed to ask for assistance from a bilingual passenger. In the few cases where there is no one on the bus who can offer language assistance, the bus driver contacts dispatch, and a supervisor is sent to the bus to assist. Spanish speaking callers are directed to a bilingual dispatcher.

Receptionist, Office Technician, Office Assistant and Mobility Coordination staff serve as a primary in-person contact for LEP persons. They are present at special events, community functions, school presentations and other locations upon request. The need for a professional interpreter is determined by the venue, the area, and the subject of the event. The person coordinating the event can indicate if there will be Spanish speaking people in attendance and can request a bilingual professional interpreter. Office administrative staff, Mobility Coordination staff, dispatchers and drivers are also responsible for forwarding complaints to the appropriate management level. They ensure that complaints from LEP persons that could be considered as national origin discrimination are forwarded to the person designated to handle all Title VI complaints.

## **IVT**

The IVT oral language services include bilingual representatives for the reservation line, which serves as the primary contact with customers, as well as bilingual staff in the dispatch center, including bilingual Supervisors. Between these two centers there is at least one bilingual person on staff at all times. The IVT service also has a majority of bilingual vehicle operators. In addition to these oral language services, several written language services are available. The following are written communications that are printed in both Spanish and English:

- The IVT Schedule Guide
- Marketing materials such as television and radio commercials
- Social media marketing and notices
- Interior vehicle posters and stickers displaying vital information, such as safety information
- Brochures with information about accessibility and general riding
- ADA compliant websites

There are several measures in place to respond to LEP individuals. Vehicle operators, who are the primary in-person contact for LEP persons, have several methods to respond to an LEP individual. Many vehicle operators are bilingual; however, if the vehicle operator is not bilingual, they can contact dispatch for radio assistance with a Spanish-speaking passenger. They can also request a bilingual supervisor or vehicle operator to be sent for further assistance. Spanish speaking callers are directed to a bilingual dispatcher.

### **ADA Paratransit**

The ADA Paratransit service oral language services include bilingual representatives for the reservation line, which serves as the primary contact with customers, as well as bilingual staff in the dispatch center, including bilingual Supervisors. Between these two centers there is at least one bilingual person on staff at all times. The ADA Paratransit service also has several bilingual vehicle operators. In addition to these oral language services, several written language services are available. The following are written communications that are printed in both Spanish and English:

- The ADA Paratransit brochure
- Marketing materials i.e. television and radio commercials
- ADA Paratransit Eligibility application
- Interior van posters and stickers displaying vital information, such as safety information
- Brochures with information about accessibility and general riding
- ADA compliant website

There are several measures in place to respond to LEP individuals. Vehicle operators, who are the primary in-person contact for LEP persons, have several methods to respond to an LEP individual. Many vehicle operators are bilingual however, if the vehicle operator is not bilingual, they can contact dispatch for radio assistance with a Spanish-speaking passenger. They can also request a bilingual supervisor or vehicle operator to be sent for further assistance. Spanish speaking callers are directed to a bilingual dispatcher.

### **3. Training Staff**

It is important that staff members, especially those having contact with the public, know their obligation to provide meaningful access to information and services for LEP persons. Even staff members who do not interact regularly with LEP persons should be aware of and

understand the LEP plan. Properly training staff is a key element in the effective implementation of the LEP plan.

There are five primary groups of staff members who are critical to the LEP plan: ICTC staff, bus operators, dispatchers and customer contact personnel, marketing and mobility staff, and management. Bus operators have the most frequent contact with LEP persons through daily interaction with passengers. Dispatch and customer contact personnel also have frequent contact with LEP persons either in-person or by telephone. These two groups are most likely to encounter LEP persons and thus to provide language assistance. LEP training for both of these groups occurs during their initial training. Additionally, this training is included in an annual safety meeting held for all bus operators. Training topics for these two groups include:

- What Title VI is
- Understanding the Title VI LEP responsibilities
- What language assistance services are offered

### **Specific procedures to be followed when encountering an LEP person**

Management is also crucial in implementing LEP policy. It is their responsibility to disseminate LEP plan information to appropriate administrative and technical staff. Management should also ensure staff understands Title VI responsibilities and how to handle complaints.

### **IVT and ADA Paratransit**

There are three primary groups of staff members who are critical to the LEP plan: bus operators, dispatch and customer contact personnel. Bus operators have the most frequent contact with LEP persons, through daily interaction with passengers. Dispatch personnel have frequent contact with LEP persons through reservation lines. Customer contact personnel also have frequent contact with LEP persons through the telephone lines. These three groups are most likely to encounter LEP persons and thus to provide language assistance. LEP training for these groups occurs during their initial departmental training. Training topics for these two groups include:

- Understanding the Title VI LEP responsibilities
- Language assistance services available
- Specific procedures to be followed when encountering an LEP person
- Handling complaints and LEP requests

### **4. Monitoring and updating the LEP plan**

This plan is designed to be flexible and should be viewed as a continuing work in progress. As such, it is important to consider whether new documents and services need to be made accessible for LEP persons, and to monitor changes in demographics and types of services, to update the LEP plan when appropriate. At a minimum, ICTC, IVT and the ADA Paratransit

services will follow the Title VI Program update schedule for the LEP plan. Each update should examine the following:

- How many LEP persons were encountered?
- Is the existing language assistance meeting the needs of LEP persons?
- What is the current LEP population in Imperial County?
- Has there been a change in the types of languages where services are needed?
- Have available resources, such as technology, staff and finances changed?
- Were any complaints received?
- Do staff members understand the LEP plan policies and procedures?

There are several methods that can be used to assist in answering these questions. One method is to review customer comments and complaints to determine if services are accessible to Spanish speakers. Feedback from the LEP community will be sought through community outreach events and presentations to determine the effectiveness of the plan in reaching LEP persons. Special consideration will be given to the LEP plan when service enhancements or service reductions are scheduled, to ensure that LEP persons are aware of these services. Census data will also be reviewed as it becomes available to determine changes in the LEP population.

#### **Future considerations for the LEP plan include:**

- Continuing creating future websites in an English/Spanish bilingual format
- Translating all informational brochures into Spanish
- Providing group travel training to LEP persons by working with bilingual staff

This plan outlines five key areas of an effective LEP strategy: identifying LEP individuals who need language assistance, primarily through Census data; language assistance measures, including written and oral language services, and responding to LEP persons on the telephone, in writing and in person; training staff, including coach operators, customer service representatives and management employees; providing notice to LEP persons through both oral and written communications; and monitoring and updating the LEP plan through a variety of means.

# Language Assistance Plan – Implementation and Practical Application

## Introduction

In the Four Factory Analysis, ICTC has identified the Limited English Proficiency populations that live within its service area, as well as the general types of communications the agency generates and how they might be used by these populations. The Language Assistance Plan is comprised of the following elements:

1. The results of the Four Factor Analysis.
2. A description of how ICTC provides language assistance services by language.
3. A description of how ICTC provides notice to LEP persons about the availability of language assistance.
4. A description of how ICTC trains employees to provide timely and reasonable language assistance to LEP populations.
5. A description of how ICTC monitors, evaluates, and updates the Language Assistance Plan.

## The Results of the Four Factor Analysis

The purpose of the Four Factor Analysis is to identify LEP populations within the Imperial County and the IVT Imperial Valley Transit (IVT) and ADA Paratransit services. According to the Census 2020 information 85% that the total population is of Hispanic or Latino descent. Spanish language is prevalent throughout the service area and a high percentage of Spanish LEP speakers live in Imperial County as it is in close proximity to the Mexico international border.

We assessed the following information; the 2020 US Census data/American Community Survey reports that “People Who Speak a Language Other Than English at Home” is 74.9%, “People Who Speak Spanish at Home” is 73.5%, while “People Who Speak English Less Than Very Well” is 34.2% and the 2023 American Community Survey (ACS) 5 Year Estimates for Imperial County (conducted by the US Census Bureau) also indicates that persons who speak only English at home comprise 24.9% of persons in the County of Imperial. While those that speak Spanish are estimated to be at 73.7%.

## Language Assistance services

There are several language assistant measures that are available to LEP populations within Imperial County and the IVT Imperial Valley Transit (IVT) and ADA Paratransit services. These include:

- Translation of key documents to Spanish
- Bus operators are bi-lingual
- Dispatch personnel are bi-lingual

- Vehicle operators needing assistance with an LEP individual may contact dispatch for radio assistance
- Any staff may request for a bilingual supervisor to be sent out for further assistance

### **Notice to LEP Persons about available Language Assistance**

Our transit system notifies LEP persons in Spanish that language assistance is available without cost. ICTC notifies LEP persons in Spanish via brochures, flyers, and local advertisements. All major community workshops and meetings include instructions on how to request translation services. Bilingual staff is present at community outreach events with LEP communities. ICTC provides interpreters at community meetings as needed. For media outreach ICTC uses non-English community radio stations and television stations to announce major community workshops.

### **Training Staff**

ICTC works to instill in its staff and third-party contractors an awareness of and sensitivity to the needs of LEP persons. Both ICTC and IVT staff are likely to come in contact with LEP individuals and are trained on procedures for accommodating LEP persons. LEP training for these groups occurs during their initial departmental training. Training topics for these groups include Title VI program. These trainings include instructions for how to respond to phone inquiries and written communication from LEP persons.

### **Monitoring and updating the LAP plan**

This plan is designed to be flexible and should be viewed as a continuing work in progress. As such, it is important to consider whether new documents and services need to be made accessible for LEP persons, and to monitor changes in demographics and types of services, to update the LAP plan when appropriate. At a minimum, ICTC, IVT and the ADA Paratransit services will follow the Title VI Program update schedule for the LAP plan.

## **Description of Subrecipient Monitoring and Schedule of Subrecipient Title VI Program Submission**

In accordance with 49 CFR 21.9(b), and to ensure that subrecipients are complying with the DOT Title VI regulations, primary recipients must monitor their subrecipients for compliance with the regulations. ICTC periodically monitors to determine a subrecipient's compliance with the FTA/FHWA Title VI regulations. These reviews include service measurements, location of transit service and facilities, participation opportunities in the transit planning and decision-making processes, and communication needs of persons with limited English proficiency (LEP).

ICTC did not have any subrecipients for the reporting period of 2023-2026. ICTC recognizes the need to monitor subrecipients in compliance with Title VI. When subrecipients enter into agreements/MOUs for receipt of funds, statements are placed to ensure compliance with all applicable federal requirements including those associated with Title VI and the regulations of the Department of Transportation. Upon signing of the funding agreements ICTC staff will contact subrecipients to ensure they understand Title VI requirements and to determine what help or guidance they might need to complete their Title VI program. Subrecipients will be given copies of ICTC's Title VI program for their reference and use. ICTC will follow the "ICTC FTA Subrecipient Monitoring Policy".

Based on the subrecipient's need, ICTC will provide additional assistance including technical help; this may include information sharing, research assistance, or review of subrecipient's draft documents. ICTC will provide an in-depth review of the requirements to ensure subrecipient's understanding of the Title VI program requirements. ICTC will check in periodically to ensure that Title VI program is up to date. ICTC will also conduct annual compliance checks to ensure full implementation of the program. ICTC will support and provide assistance as requested by the subrecipient to fully implement the Title VI program.

## Title VI Equity Analysis

ICTC is currently in the process of construction of the Calexico Intermodal Transfer Center. The completion of this project is expected to be in April 2026. A Community Impact Assessment was performed for the California Department of Transportation (Caltrans) in May 2021. The Project involves the construction of a bus transfer terminal in the downtown area of the City of Calexico. As described in the Community Impact Assessment (CIA), the Project would not result in any substantial effects to the community. The Equity Analysis was conducted during the planning stage with regard to the location of the facility.

An equity analysis was conducted during the planning stage for the Calexico bus transfer terminal which will require land acquisition and displacement of businesses. Outreach was done to include persons potentially impacted by the siting of the site. Other facilities were reviewed to determine any cumulative adverse impacts.

The location of the project will not result in a disparate impact on the basis of race, color, or national origin. Legitimate justification for the project location included in the full report included here:

<https://www.imperialctc.org/assets/calexico-itc-cia.pdf>

## **Additional Information for Transit Providers that operate less than 50 fixed route vehicles in peak service and are not located in an Urbanized Area (UZA) of 200,000: System-Wide Policies and Service Standards**

### **Effective Practices to Fulfill the Service Standard Requirement**

#### ***Vehicle Load Standards***

The average of all loads during the peak operating period should not exceed the following load factors for that service type:

Primary Corridor Bus: Loads not to exceed 1.57 passenger / seat  
Local Services: Loads not to exceed 1.25 passengers / seat

#### ***Vehicle Headway Standards***

Peak period headways on 1 N and 1 S will be 35 minutes, Monday through Friday. ICTC will explore the possibility of instituting 35-minute headways on route 2N and 2S within and throughout the Primary Corridor depending on the availability of funding.

Other lines may operate at longer headways, based on the long distances traversed, ridership, demand, and transfer opportunities at the terminus of these lines.

#### ***On-Time Performance Standards***

Fixed Route [Local and Intercity]:

ICTC endeavors to operate with no early departures before the time shown in the schedule brochure.

Ninety (90) percent of all trips should be operated "on-time," defined as departing a published time-point no more than ten (10) minutes later than the published scheduled to accommodate the deviation pick-ups.

Demand Response:

Ninety-five (95) percent of all monthly trips operate on-time ten (10) minutes past the scheduled pick-up time, with the pick-up time defined as within the 30-minute manifest block.

#### ***Service availability***

The 2019 Short Range Transit Plan presents service coverage for Imperial Valley Transit in residential areas as ninety (90) percent of the population being within ¼ mile of a bus route. The

major activity centers for Imperial Valley Transit are employment concentrations of 200 or more employees, health centers, middle schools, high schools, colleges, universities, shopping centers of over 25 stores, and social services/government centers.

Route Spacing recommendations given an area's population density and percentage of households without automobiles is depicted below:

% of Households without Automobiles	Population Density (Persons per Square Mile)			
	Over 6,400	4,500 to 6,400	2,500 to 4,449	Under 2,500
Over 15.0	1/4 mile	1/4 mile	3/8 mile	1/2 mile
10.0 to 15.0	1/4 mile	3/8 mile	1/2 mile	1 mile or paratransit
5.0 to 9.9	3/8 mile	1/2 mile	1 mile or paratransit	-
Below 5.0	1/2 mile	1 mile or paratransit	-	-

## **Effective Practices to Fulfill the Service Policy Requirement**

### ***Vehicle Assignment Policy***

Fixed Route [Local and Intercity]:

Bus assignments take into account the operating characteristics of the various buses within the ICTC fixed route fleet, which are matched to the operating characteristics of the route. In the absence of specific operating requirements, vehicle assignments will be done so as to ensure a random rotation of fleet vehicles through the routes in the ICTC system.

Demand Response:

Except for situations requiring the assignment of a trip to a specific vehicle for reasons such as lift capacity, interior clearance or operating characteristics within the service area, demand response trips shall be assigned so as to ensure that vehicles are randomly operated in these services.

### ***Transit Amenities Policy***

The following policies will be applied as funding allows:

Installation of a shelter should be considered at bus stops with an average per trip boarding of 5 or more passengers. Seating/benches should be considered at bus stops with an average per trip boarding of 3 or more passengers.

Priority for benches and shelters should be given to bus stops serving senior housing or activity centers, or facilities which serve clients with mobility impairments.

## **Title VI training**

Currently ICTC provides all with Title VI training provided by the National Transit Institute.

Developing and implementing staff training of ICTC's Title VI program while also coordinating public dissemination will be of priority.

Training is mandatory for all ICTC employees. Trainings will take place at least once every two years. The trainings at a minimum will include Title VI and nondiscrimination laws, how to recognize and process a Title VI complaint, how to respond to LEP requests, who the Title VI coordinator is, implementations of Title VI program by ICTC to comply with FTA and FHWA requirements.

These training courses are documented by maintaining sign-in sheets or training agendas.

## **Title VI Assurances in Contract Documents and Agreements**

ICTC has signed the Title VI assurances as part of the Exhibit 4-C "MASTER AGREEMENT - ADMINISTERING AGENCY-STATE AGREEMENT FOR FEDERAL-AID PROJECTS" (specifically, Appendices A and E of the Title VI Assurances) in all sub-contracts and sub-agreements with federal funds, where applicable.

ICTC will insert the clause of the Appendix E of the Title VI Assurance in every federally-funded contracts and agreements.

## **Data Collection**

ICTC may collect and analyze data on the statistical demographic data of participants/beneficiaries of its federally-funded activities and programs. This data comes from governmental sources responsible for collecting and vetting the information for consistency and accuracy, including the U.S. Bureau of Labor Statistics, U.S. Census Bureau, U.S. Bureau of Economic Analysis, California Department of Finance, California Department of Labor, California Employment Development Department, among others.

Additionally, ICTC may collect project-specific demographic data through the course of conducting public outreach for programs, activities, services, and projects. ICTC may collect the data of participants at public meetings. This data may help determine the characteristics of the communities that are affected by its activities, programs, and services.

ICTC does not deny participation based on failure to provide data, data collection is planning-level, and individual race/ethnicity is voluntary.

ICTC analyzes data from the U.S. Census Bureau's American Community Survey to help determine the languages spoken by the population served.

Data is reviewed during RTP updated, TIP development, and during major planning or programming decisions. ICTC reviews demographic data to identify minority and low-income populations, evaluates whether outreach efforts reached affected communities and assesses whether any group was excluded or disproportionately impacted.

# Title VI Reviews

## Internal

Imperial County Transportation Commission (ICTC) shall conduct periodic internal Title VI compliance reviews to ensure that its programs, policies, and activities are implemented in a nondiscriminatory manner in accordance with Title VI of the Civil Rights Act of 1964, 23 CFR 200, and applicable USDOT and FHWA guidance.

The Title VI Coordinator, in coordination with relevant ICTC program staff, shall conduct an internal Title VI compliance review at least once every two years, or more frequently as necessary due to organizational changes, federal guidance updates, or identified compliance concerns.

The internal reviews for the Title VI program will ensure that the following items are being met:

- Accomplishments and Goals Report
- Dissemination of the Title VI Information
- Training for Title VI
- Complaint reviews
- Language access to LEP individuals
- Review contracts and agreements for appropriate Title VI language
- Public participation
- Website
- Data Collection

## External (sub-recipients)

The reviews for sub-awardees/sub-recipients will entail an examination of the recipients' adherence to all Title VI requirements. ICTC shall ensure that any agency, consultant, or subrecipient receiving federal funds through ICTC executes a Title VI assurance and will be monitored for compliance. Monitoring may include review of that agency's Title VI plan, public outreach documentation, LEP implementation, and complaint records. Identified issues will be addressed through corrective action plans. ICTC shall follow the FTA Subrecipient Monitoring Policy.

# **Appendices**

- A. Title VI Complaint Form (English)**
- B. Title VI Complaint Form ( Spanish)**
- C. List of Transit-Related Title VI Investigations, Complaints, and Lawsuits (as of: January 2026)**
- D. ICTC Title VI Annual Work Plan**
- E. Title VI Procedures for Interpretation or Translation Requests**
- F. Title VI Complaint Log**
- G. Internal Title VI Review Report**

## A. Title VI Complaint Form (English)



1503 N. IMPERIAL AVE., SUITE 104  
EL CENTRO, CA 92243-2875  
PHONE: (760) 592-4494  
FAX: (760) 592-4410

## Title VI Complaint Form

Title VI of the 1964 Civil Rights Act requires that “No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.”

The following information is necessary to assist us in processing your complaint. Should you require any assistance in completing this form, please let us know.

Complete and return this form to the Title VI Coordinator: Imperial County Transportation Commission, 1503 N. Imperial Ave. Suite 104 El Centro, CA 92243.

1. Complainant's Name \_\_\_\_\_
2. Address: \_\_\_\_\_
3. City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_
4. Telephone Number (Home): \_\_\_\_\_ (Mobile): \_\_\_\_\_
5. Email \_\_\_\_\_
6. Person discriminated against (if someone other than the complainant):  
Name: \_\_\_\_\_ Relationship: \_\_\_\_\_  
Address: \_\_\_\_\_  
City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_  
Please explain why you have filed for a third party: \_\_\_\_\_

Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party: Yes  No

7. Which of the following best describes the reason you believe the discrimination took place?

- a. Race:
- b. Color:
- c. National Origin:

8. What date did the alleged incident take place? \_\_\_\_\_

9. In your words, describe the alleged incident. Explain what happened and whom you believe was responsible. Please use the back of this form if additional space is required.

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10. Have you filed this complaint with any other federal, state or local agency, or with any federal or state court? Yes:  No:

If yes, please check each box that applies:

Federal Agency  Federal Court  State Agency

State Court  Local Agency

11. Please provide information about a contact person at the agency/court where the complaint was filed.

Name: \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Telephone number: \_\_\_\_\_

12. Signature and date required below. You may attach any written materials or other information that you think is relevant to your complaint.

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Complainant's Signature

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Date

## B. Title VI Complaint Form (Spanish)



1503 N. IMPERIAL AVE., SUITE 104  
EL CENTRO, CA 92243-2875  
PHONE: (760) 592-4494  
FAX: (760) 592-4410

## Título VI Formulario Para Denuncia

El Título VI del Acto de los Derechos Civiles de 1964 establece que “Ninguna persona en los Estados Unidos debe, por causa de raza, color, u origen nacional sea excluida de participación en, o ser negado los beneficios de, o ser sujeto a discriminación bajo cualquier programa o actividad que recibe asistencia financiera de parte del gobierno federal.”

La siguiente información es necesaria en asistirnos en procesar su denuncia. Si usted necesita ayuda para llenar este formulario, por favor háganoslo saber.

Llene y regrese este formulario al Coordinador de Título VI: Imperial County Transportation Commission, 1503 N. Imperial Ave. Suite 104, El Centro, CA 92243.

1. Nombre del Demandante: \_\_\_\_\_
2. Domicilio: \_\_\_\_\_
3. Ciudad \_\_\_\_\_ Estado: \_\_\_\_\_ Código Postal: \_\_\_\_\_
4. Número de Teléfono (Hogar): \_\_\_\_\_ (Celular): \_\_\_\_\_
5. Correo Electrónico: \_\_\_\_\_
6. Persona que fue discriminada (en caso de una persona distinta del autor):

Nombre: \_\_\_\_\_

Domicilio: \_\_\_\_\_

Ciudad: \_\_\_\_\_ Estado: \_\_\_\_\_ Código Postal: \_\_\_\_\_

Explique la razón por la que la denuncia es presentada a través de una tercera persona:

\_\_\_\_\_

Confirme que ha obtenido permiso del agraviado:

Si  No

7. ¿Cuál de las siguientes describe mejor la razón que usted cree que la discriminación se llevó a cabo? ¿Fue debido a su?:

a. Raza:

b. Color:

b. Origen Nacional:

8. ¿En qué fecha sucedió el presunto incidente? \_\_\_\_\_

9. En sus propias palabras describa el incidente. Explique qué sucedió y quien cree usted fue responsable. Por favor utilice el reverso de este formulario si necesita más espacio.

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10. ¿A usted presentado esta queja a alguna otra agencia federal, estatal, o local; o con alguna corte federal o estatal? Si:  No:

En caso afirmativo, por favor marque cada cuadrito que corresponde:

Agencia Federal  Corte Federal  Agencia Estatal

Corte Estatal  Agencia Local

11. Por favor provea información sobre una persona de contacto en la agencia/corte donde presento su demanda:

Nombre \_\_\_\_\_

Domicilio: \_\_\_\_\_

Cuidad: \_\_\_\_\_ Estado: \_\_\_\_\_ Código Postal: \_\_\_\_\_

Número de Teléfono: \_\_\_\_\_

12. Firma y fecha requeridas abajo. Usted puede adjuntar cualquier material escrito o cualquier otra información que considere relevante para su queja.

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Firme del Demandante

Fecha

### **C. List of Transit-Related Title VI Investigations, Complaints, and Lawsuits (as of: January 2026)**

There are currently no transit-related Title VI investigations, complaints or lawsuits.



## **D. Title VI Accomplishments and Goals Report Fiscal Year 2025**

February 27, 2025

The Title VI Coordinator is required to establish goals for the Title VI Program, monitor progress toward achieving those goals, and report on program accomplishments on an annual basis. This annual report covers the period from July 1, 2024 through June 30, 2025 (Fiscal Year 2025). The report is made available to the public on the program's website, <https://www.imperialctc.org/policies/title-vi>

### **Fiscal Year 2025 Accomplishments**

Program accomplishments in the reporting period include:

- Imperial County Transportation Commission (ICTC) completed and submitted to Federal Transit Administration (FTA) the Title VI Program on February 1, 2026.
- The last Triennial Program Update was approved April 6, 2023 by FTA.
- ICTC updated program information for the public (website, public notice, complaint form).
- ICTC developed the Title VI Implementation Plan, which includes formal complaint procedures, and has made it available to the public on the program's website.
- ICTC conducted an annual LEP Assessment.
- ICTC provided Title VI training for all employees.
- ICTC conducted an internal review of the Title VI program areas in April 2025.
- The updated complaint form and procedures are available in English and Spanish and are available to the public on the website and are posted in highly visible locations within ICTC offices, IVT buses, and IVT facilities that serve the public.

### **Fiscal Year 2026 Goals**

Program goals for the next reporting period (July 1, 2025 through June 30, 2026) include:

1. Ensure the Title VI training is provided to all employees every two years.
2. Review the Title VI assurances included in ICTC contract documents and agreements for federally funded projects.
3. Conduct an LEP Assessment.
4. Prepare for the Triennial Program Update due February 1, 2026.



## **E. Title VI Procedures for Interpretation or Translation Requests**

Currently ICTC provides a notice of assistance in its public meetings for those in need of translation services. A request may be submitted for special assistance including accessibility and translation services. Once a request is submitted a translator will be hired for the meeting.

Currently ICTC employees are also available to provide assistance with either interpretation or translation requests. Bi-lingual employees are available during public meetings and during office hours. Interpretation services for virtual public meetings are also available upon request.

ICTC's experience with request for language services has been minimal and all public documents are provided in both English and Spanish.

ICTC maintains an LEP log to track interpretation and translation requests received and provided.

## F. Title VI Complaint Log

**Title VI Discrimination Complaint Log**

Agency Name:	Imperial County Transportation Commission	Name of respondent (person's business/agency who the complainant is against):	Nature of the complaint:	Date forwarded to Caltrans/Federal Highway Administration (FHWA):	Date of Disposition/Comments:
Agency Name:	Date the complaint was filed:	Date of alleged discriminatory act(s):	Basis of complaint (protected class: race, color, and national origin):		
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## **G. Internal Title VI Review Report**

**Imperial County Transportation Commission**

### **Internal Title VI Compliance Review Report**

**Review Period:**

**Date of Review:**

**Prepared by:** Title VI Coordinator

**Program Reviewed:** FTA/FHWA-funded Planning and Programming Activities

#### **1. Purpose of Review**

The purpose of this Internal Title VI Compliance Review is to evaluate ICTC's adherence to **Title VI of the Civil Rights Act of 1964, 23 CFR 200**, and applicable FHWA and Caltrans guidance. The review assesses whether ICTC's programs, policies, and activities are implemented in a nondiscriminatory manner and whether required Title VI procedures are documented and followed.

#### **2. Scope of Review**

The internal review evaluated the following Title VI program elements:

- Title VI Policy Statement and Assurances
- Title VI Complaint Procedures and Complaint Log
- Limited English Proficiency (LEP) Plan implementation
- Public Participation and Environmental Justice outreach
- Title VI Training requirements and documentation
- Title VI Data Collection and Analysis practices

#### **3. Methodology**

The review was conducted through:

- Review of ICTC's adopted Title VI Program document
- Examination of complaint logs and correspondence
- Review of public outreach documentation and meeting notices
- Review of LEP assistance records and translated materials
- Review of Title VI training agendas and attendance records
- Interviews with ICTC program staff, as applicable

## **4. Review Findings**

### **4.1 Title VI Policy and Assurances**

**Status:**

**Observations:**

### **4.2 Complaint Procedures**

**Status:**

**Observations:**

### **4.3 LEP Plan Implementation**

**Status:**

**Observations:**

### **4.4 Public Participation and Environmental Justice**

**Status:**

**Observations:**

### **4.5 Title VI Training**

**Status:**

**Observations:**

### **4.6 Data Collection and Analysis**

**Status:**

**Observations:**

## **5. Corrective Actions**

<b>Issue Identified</b>	<b>Corrective Action</b>	<b>Responsible Party</b>	<b>Target Completion</b>
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## **6. Conclusion**

## **7. Certification**

I certify that this Internal Title VI Compliance Review was conducted in accordance with ICTC's Title VI Program procedures.

**Signature:** \_\_\_\_\_

**Name / Title:** Title VI Coordinator

**Date:** \_\_\_\_\_