

City of Glendale  
Department of Public Works, Transit Division



**Program to Meet  
Title VI Requirements  
of the Civil Rights Act of 1964  
as a Federal Transit Administration  
Subrecipient**

May 2024

## **A. Introduction**

The City of Glendale operates a local public transit system known as Glendale Beeline and a paratransit service for elderly and disabled known as Dial-A-Ride. Both transit programs serve Glendale, La Canada Flintridge and the unincorporated areas of Montrose and La Crescenta with a population of approximately 237,000 residents. The Glendale Beeline provides community service that supports the regional bus service operated by the Los Angeles County Metropolitan Transportation Authority (Metro).

The City of Glendale is a subgrantee to Metro by way of federal competitive grant programs either directly from the Federal Transit Administration (FTA) or through the Southern California Association of Governments (SCAG), the region's metropolitan planning organization (MPO). Recent awards include the FTA Section 5310 grant for the replacement of five Dial-A-Ride minivans.

## **B. Preparation and Submittal of Title VI Program**

As a subgrantee for Federal Transit Administration (FTA) funds, the City of Glendale is required to certify compliance with the requirements of Title VI as part of the federal grant approval process. The City's Title VI compliance program is updated every three years and is submitted to Metro. This document is based on the reporting requirements outlined in FTA Circular 4702.1B, dated October 1, 2012.

In an effort to eliminate redundancy, if, prior to the deadline for subsequent reporting periods, the City of Glendale has not altered its existing demographic analysis, service standards, or service policies, the City will provide a statement to this effect in lieu of copies of the original documents.

### **1. Public Notification of Rights under Title VI**

The City is required to notify the public of their protection under Title VI. Notifications are posted in English, Spanish and Armenian languages onboard each Beeline and Dial-A-Ride vehicle and the notice is provided in each Beeline public schedule and on the City webpage. Hard copies of the Glendale Title VI Program are also available by request from the City's Public Works Department.

The Beeline onboard posting of the public notice in English reads:

**Non-Discrimination:** In accordance with Title VI of the 1964 Civil Rights Act, Glendale Beeline is committed to ensuring that no person shall be excluded from participation in or be denied benefits of its services, programs or activities on the basis of race, color, or national origin. If you believe that you have been subjected to discrimination under Title VI, you may call 818-548-3960 or file a written complaint at [www.GlendaleBeeline.com](http://www.GlendaleBeeline.com). You may also file a Title VI complaint with the Federal Transit Administration, Office of Civil Rights. Written complaints must be filed within 180 days of the date of alleged discrimination.

The Dial-A-Ride onboard posting of the public notice in English reads:

**Non-Discrimination:** In accordance with Title VI of the 1964 Civil Rights Act, Glendale Dial-A-Ride is committed to ensuring that no person shall be excluded from participation in or be denied

benefits of its services, programs or activities on the basis of race, color, or national origin. If you believe that you have been subjected to discrimination under Title VI, you may call 818-548-3960 or file a written complaint at [www.GlendaleDialARide.com](http://www.GlendaleDialARide.com). You may also file a Title VI complaint with the Federal Transit Administration, Office of Civil Rights. Written complaints must be filed within 180 days of the date of alleged discrimination.

## **2. Title VI Complaint Procedures**

Any person who believes that she or he has been discriminated against under Title VI by the City of Glendale's Glendale Beeline or Dial-A-Ride program may file a Title VI complaint with the City. A person may also file a Title VI complaint directly with the Federal Transit Administration.

Appendix A – Title VI Complaint Procedures contains the City of Glendale standard operating procedures for filing, investigating and tracking Title VI complaints, the complaint form, and complaint log.

## **3. Record of Title VI Investigations**

The City has prepared and maintains a listing of active investigations, lawsuits, or complaints naming the City that allege discrimination on the basis of race, color, or national origin. Appendix A - Title VI Complaint Procedures contains a sample of the City of Glendale complaint log.

Neither Glendale Beeline nor Dial-A-Ride has received any Title VI investigations, lawsuits or complaints.

## **4. Access to Services by Persons with Limited English Proficiency**

The City takes steps to ensure meaningful access to the transit programs and services by persons with limited English proficiency. Glendale's Limited English Proficiency (LEP) Plan is submitted as part of this Title VI report in Appendix B – Limited English Proficiency (LEP) Plan. The LEP Plan contains details regarding how the City's transit services accommodate customers who do not speak English well.

## **5. Promoting Inclusive Public Participation**

The Title VI guidelines emphasize the importance of promoting inclusive public participation. The City makes effort to seek out and consider the viewpoints of minority, low-income and LEP populations in its outreach and involvement activities. It is the practice of the City to provide opportunities for public participation early in the planning process particularly for significant service changes and fare increases. Considerable effort is made to provide access to information and a number of methods for minorities, low-income and LEP persons to participate.

### **5.1 Past Public Outreach Efforts**

The Glendale Beeline typically conducts public outreach during major planning studies or when major changes to the transit system are being proposed. Examples of public outreach activities

undertaken for recent major changes include:

- **2019 Glendale Beeline Transit Route Analysis.** Public notices were posted in multiple languages on board all vehicles. Take-ones were available in multiple languages on-board vehicles and displayed at public counters in 30 transit-frequented locations throughout the service area. Information posters were posted in multiple languages at bus stops. Newspaper notices and opinion pieces were published in multiple languages and information was posted on the City's webpage. The City encouraged participation by phone, walk-in, written communication, and electronic communication (each point of access accommodated any language group). Comment cards were provided on transit vehicles. Public meetings were scheduled and conducted on different days in the evening at locations accessible by public transportation. Meetings could be viewed live on television and recorded meetings could be viewed online at any time of day. This was the most recent major change on the Beeline network.

City staff has conducted outreach efforts to senior centers, churches, and civic organizations within the service area. For its *Transit Route Analysis*, the Beeline distributed a press release providing information on the study and soliciting comments to all local papers, including foreign language newspapers and informational pieces were translated into multiple languages. Personnel from the City's Public Works Department have appeared as guests on one or more of the Armenian cable television networks.

As part of the *Transit Route Analysis* of the Beeline system, an on-board survey was conducted. A total of 779 surveys were received and analyzed. The primary survey instrument was two-sided, with an English version on one side and a Spanish version on the other, and the same was also available in Armenian. Eleven percent of survey respondents answered the Spanish-language survey and three percent answered the Armenian-language survey. Key findings are summarized in the following paragraphs.

Beeline riders are using transit primarily for work and school trips: work is the most common trip purpose at 38 percent of all trips, followed by school at 25 percent. The survey asked about ownership of smart phones and tablets. Over three-quarters of all respondents carry smartphones, and a majority in every age and income category have smartphones with them. Among respondents 62 years of age and older, 57 percent reported carrying a smart phone, compared to 29 percent in 2013.

The survey asked customers to choose among various service improvements. Respondents expressed an overwhelming preference for greater frequency on existing routes over new or extended routes to new places. Respondents were more likely to choose fewer stops to speed up the buses, even if it meant a longer walk to/from the stop. More peak period service ranked highest among weekday improvements. The most requested weekend changes were to operate more routes on Saturday and to operate later in the evening.

A new question in that year's survey asked about any factors that prevent greater use of the Beeline. Over one-third of respondents indicated that there were no factors, while one-quarter said that Beeline routes do not travel where they need to go and one-fifth reported that the Beeline does not travel when they need it.

In terms of demographics, Beeline riders are most likely to be female. Many Beeline riders report low incomes, but 73 percent live in a household with at least one vehicle. Riders are of all ages.

Between 2013 and 2019, the percentage of riders age 62 and older has increased from 12 to 18 percent. The most common ethnicity is Latino, but Latino riders do not constitute a majority of all riders.

Beeline riders are very pleased with the service. On a scale of one (poor) to four (great), respondents rate Beeline service at an average of 3.57, a very high rating and an increase from 3.36 in 2013. The highest rated items are cleanliness, safety, and operator courtesy. The lowest ratings among all service elements are for availability of schedules (3.36), but even this score is respectable. Customer ratings increased for each service element since 2013.

Most responses to this survey were not appreciably different from responses in 2013. Notable differences include increased use of real-time bus arrival information, interest in Google Transit, greater likelihood across all demographics of having a smartphone, a higher percentage of riders age 62 and older, and increased ratings of overall service and of individual service elements.

Also as part of this study, the project team conducted a multi-lingual, community-wide online survey (e-survey) designed to invite input from the Glendale community and individuals who travel within and through Glendale. The e-survey was open online and promoted extensively over eight weeks, from the second week of February through the second week of April 2019, to allow for responses from Glendale Community College when they returned for spring semester and from community events during that time period. Responses were received from 682 individuals; only fully completed responses were used for this analysis. Key findings are summarized in the following paragraphs.

Need for transportation is a critical driver for transit usage. One-third of transit riders do not have a vehicle and 43 percent have one vehicle (significantly higher on both counts than non-transit users).

Lack of awareness of the Beeline service is a potential area to address. Over 40 percent of responding non-transit users are unaware of any bus service in the Glendale area.

Opportunities do exist for educating and travel-training non-users. Twenty-eight percent of non-transit users said they would consider riding the bus if they felt more confident. Only 10 percent of respondents indicated they would not consider riding the bus.

Students (22 percent of all respondents) represent a significant market. Nearly four out of ten responding students indicated they rode the bus. For students who do ride Beeline or LCF Shuttle, 37 percent wanted a free ride with their student ID. Of students who do not ride the bus currently, 21 percent reported they wanted a free ride with their student ID.

There is potential opportunity—and demand—for later weekday service. Fifteen percent of respondents reported returning home between 8 and 10pm. This is consistent with current bus rider suggestions for later service during the week.

## **5.2 Community Organizations and Stakeholders**

The Beeline relies on lists of community organizations and potential stakeholders that have been developed by the City of Glendale and Metro over time. The Beeline has not received expressions of interest for presentations from any community organizations or potential stakeholders.

### 5.3 Public Participation Plan Goals and Outreach Strategies

Glendale Beeline has established the following Public Participation Plan (PPP) Goals:

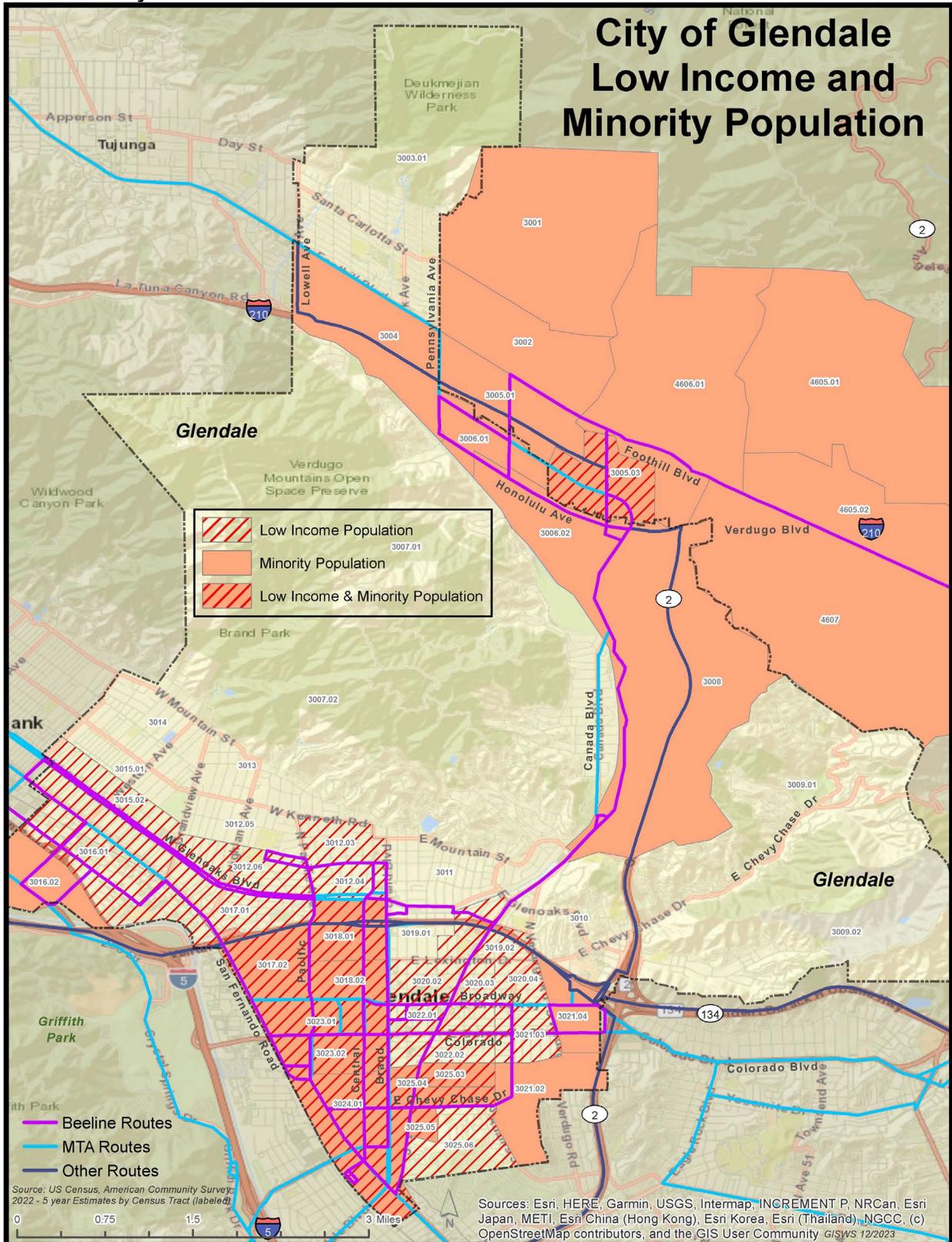
- To utilize effective means of increasing awareness and obtaining input on public transit issues from all interested residents and businesses;
- To develop effective means of encouraging participation by all constituencies, including minority and Limited-English-Proficient (LEP) populations and other constituencies that may be traditionally difficult to reach.

Section 5.1 listed many outreach strategies that have been used in the recent past. These strategies follow the basic themes of *inform, encourage, and listen*:

- Post public notices in multiple languages on all vehicles and on the City's website;
- Provide take-ones in multiple languages at public counters throughout the Beeline service area;
- Inform the media and use the media to inform current and potential customers as well as interested citizens;
- Schedule multiple meetings at convenient times;
- Hold meetings in locations accessible by public transportation;
- Broadcast meetings live on the City's cable access television station and make recorded meetings available on-line at any time;
- Make it easy to participate by phone, in person, via written communication, and electronically, with each point of access accommodating any language group;
- Coordinate with community groups to encourage participation, especially in minority and LEP communities;
- Respond to all input and comments.

Figure 1 shows minority and low-income census tracts within the Glendale Beeline service area, with an overlay of transit service. FTA Title VI guidance describes minority census tracts as those census tracts with a higher proportion of minority population than the service area as a whole, and low-income census tracts as those census tracts with a higher proportion of low-income population than the service area as a whole. The map key shows which tracts have above-average minority population, which have above average low-income population, and which have above average minority *and* low-income populations. The local fixed routes operated by Glendale Beeline and other operators such as Metro are also shown on this map. Table 1 shows actual numbers and percentages for minority groups and low-income residents in each census tract. Percentages in bold in Table 1 indicate a higher proportion of either minority population or low-income population in that census tract than in the service area as a whole.

**Figure 1**  
**Minority and/or Low Income Census Tracts within the Glendale Beeline Service Area**



**Table 1  
Numbers and Percentages of Minority and Low-Income Populations by Census Tract**

Census Tract	Total Population	Minority Population	% minority population	Population for whom Poverty Status is Determined	Population with Income in the past 12 months below poverty level	% in poverty
3001	6,862	3,396	<b>49.5%</b>	6,838	300	4.39%
3002	5,382	2,712	<b>50.4%</b>	5,382	164	3.05%
3003.01	6,399	2,404	37.6%	6,399	259	4.05%
3004	5,732	3,340	<b>58.3%</b>	5,716	241	4.22%
3005.01	2,785	1,504	<b>54.0%</b>	2,767	110	3.98%
3005.03	5,063	2,778	<b>54.9%</b>	5,063	648	<b>12.80%</b>
3006.01	6,010	3,111	<b>51.8%</b>	5,932	615	10.37%
3006.02	3,326	1,399	<b>42.1%</b>	3,193	209	6.55%
3007.01	4,988	1,484	29.8%	4,988	514	10.30%
3007.02	5,882	1,242	21.1%	5,882	612	10.40%
3008	7,172	3,093	<b>43.1%</b>	7,139	386	5.41%
3009.01	5,285	1,686	31.9%	5,285	115	2.18%
3009.02	2,046	590	28.8%	2,046	68	3.32%
3010	5,552	2,071	37.3%	5,542	538	9.71%
3011	7,140	1,609	22.5%	7,117	495	6.96%
3012.03	4,042	1,204	29.8%	4,042	523	<b>12.94%</b>
3012.04	5,018	1,964	39.1%	4,915	712	<b>14.49%</b>
3012.05	2,102	481	22.9%	2,102	112	5.33%
3012.06	5,361	1,387	25.9%	5,361	731	<b>13.64%</b>
3013	1,971	344	17.5%	1,971	119	6.04%
3014	3,803	967	25.4%	3,803	148	3.89%
3015.01	1,752	413	23.6%	1,752	23	1.31%
3015.02	7,242	1,507	20.8%	7,242	1,477	<b>20.39%</b>
3016.01	5,396	1,616	29.9%	5,343	801	<b>14.99%</b>
3016.02	3,897	2,465	<b>63.3%</b>	3,803	414	10.89%
3017.01	2,780	1,046	37.6%	2,780	447	<b>16.08%</b>
3017.02	6,160	2,575	<b>41.8%</b>	6,073	938	<b>15.45%</b>
3018.01	5,428	2,368	<b>43.6%</b>	5,428	1,123	<b>20.69%</b>
3018.02	5,487	2,430	<b>44.3%</b>	5,487	907	<b>16.53%</b>
3019.01	4,267	1,077	25.2%	4,260	400	9.39%
3019.02	3,279	1,191	36.3%	3,180	420	<b>13.21%</b>
3020.02	3,944	1,580	40.1%	3,933	1,198	<b>30.46%</b>
3020.03	3,663	1,003	27.4%	3,636	662	<b>18.21%</b>
3020.04	4,055	1,463	36.1%	4,047	801	<b>19.79%</b>
3021.02	5,888	2,386	<b>40.5%</b>	5,865	374	6.38%
3021.03	5,089	1,740	34.2%	5,087	1,229	<b>24.16%</b>
3021.04	3,662	2,067	<b>56.4%</b>	3,528	247	7.00%
3022.01	3,785	1,083	28.6%	3,785	817	<b>21.59%</b>

**Table 1 continued**  
**Numbers and Percentages of Minority and Low-Income Populations by Census Tract**

Census Tract	Total Population	Minority Population	% minority population	Population for whom Poverty Status is Determined	Population with Income in the past 12 months below poverty level	% in poverty
3022.02	5,146	1,996	38.8%	5,146	1,467	<b>28.51%</b>
3023.01	3,656	1,719	<b>47.0%</b>	3,514	492	<b>14.00%</b>
3023.02	5,487	3,499	<b>63.8%</b>	5,348	1,138	<b>21.28%</b>
3024.01	7,303	4,161	<b>57.0%</b>	7,211	886	<b>12.29%</b>
3025.03	3,878	1,783	<b>46.0%</b>	3,878	791	<b>20.40%</b>
3025.04	3,783	2,106	<b>55.7%</b>	3,783	806	<b>21.31%</b>
3025.05	4,281	1,976	<b>46.2%</b>	4,239	758	<b>17.88%</b>
3025.06	3,375	1,297	38.4%	3,260	779	<b>23.90%</b>
4605.01	5,306	2,766	<b>52.1%</b>	5,294	194	3.66%
4605.02	4,771	2,348	<b>49.2%</b>	4,759	78	1.64%
4606	5,199	2,311	<b>44.5%</b>	5,199	162	3.12%
4607	5,102	2,109	<b>41.3%</b>	5,102	232	4.55%
<b>TOTAL</b>	<b>234,982</b>	<b>94,847</b>		<b>233,445</b>	<b>27,680</b>	
<b>AVERAGE</b>			<b>40.4%</b>			<b>11.86%</b>

Source: American Community Survey 5-Year Estimates 2022, Tables B03002 and B17001  
 Bold percentages indicate a higher proportion of minority population or low-income population in that census tract than in the service area as a whole.

All census tracts that are both minority and low-income are well-served by the existing transit network. A few very large minority tracts (in Chevy Chase Canyon and in northeast La Cañada Flintridge) are not well-served, but these are not low-income tracts.

Metro bus routes play an important role within the City of Glendale, and the Glendale Beeline works closely with Metro service planning staff on transit-related public outreach within the City. Metro’s most recent Public Participation update in 2022 may be found on the Metro website at <https://www.metro.net/projects/public-participation-plan-development/>.

The Glendale Beeline also consults FTA’s Circular 4703.1, *Environmental Justice Policy Guidance for Federal Transit Administration Recipients*, which includes examples of effective strategies for engaging minority and low-income populations.

**5.4 Actions to Encourage Public Participation**

The Glendale Beeline pursues the strategies noted in the previous section during major planning studies or when major changes to the transit system are being proposed. Public participation is encouraged in the early stages of these studies, when input can help to shape the eventual recommendations. The Beeline is also proactive in keeping its major stakeholders, including community groups in minority and LEP neighborhoods, informed throughout the course of major studies.

## **6. Information Regarding the Racial Breakdown of Transit-related Policy Boards or Committees**

Recipients that have transit-related, non-elected planning boards, advisory councils or commissions, 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.

The City Council of the City of Glendale is the governing body with decision making authority over the Glendale Beeline. City Councilmembers are elected officials.

## **7. Service Standards**

The City of Glendale is required to adopt quantitative system-wide service standards necessary to guard against discriminatory service design or operations decisions. Glendale's fixed route standards are described below. Beeline staff is using these standards in making decisions regarding routes and specific trips.

### a) Vehicle Load

The fixed route vehicle load standard is 150% of seated capacity. Overcrowding, if it occurs, should be of short duration (six stops or fewer). The Dial-A-Ride vehicle load standard is 100% of seated capacity. Beeline staff reviews load data collected in line-by-line analyses, ride checks, and also monitors peak loads in response to passenger complaints and/or operator comments.

### b) Vehicle Headway

Beeline routes should operate with no more than 60-minute headway. Prevailing fixed-route headways (with some variation throughout the day) are presented in Table 2.

**Table 2  
Prevailing Headways on Glendale Beeline Routes**

<b>Route</b>	<b>Weekday Headway</b>	<b>Saturday Headway</b>	<b>Sunday Headway</b>
1	10	10	10
3	15-40	25	--
4	10	20	20
5	18	34-38	--
6	20	20	--
7	25-40	40	--
8	20	30	--
11 Express	Scheduled to meet trains	--	--
12 Express	Scheduled to meet trains	--	--
33 LCF Shuttle	40-50	--	--
34 LCF Shuttle	3 trips each direction in afternoon	--	--

Headways are not applicable to Dial-A-Ride service as all trips are reservation based.

c) On-Time Performance

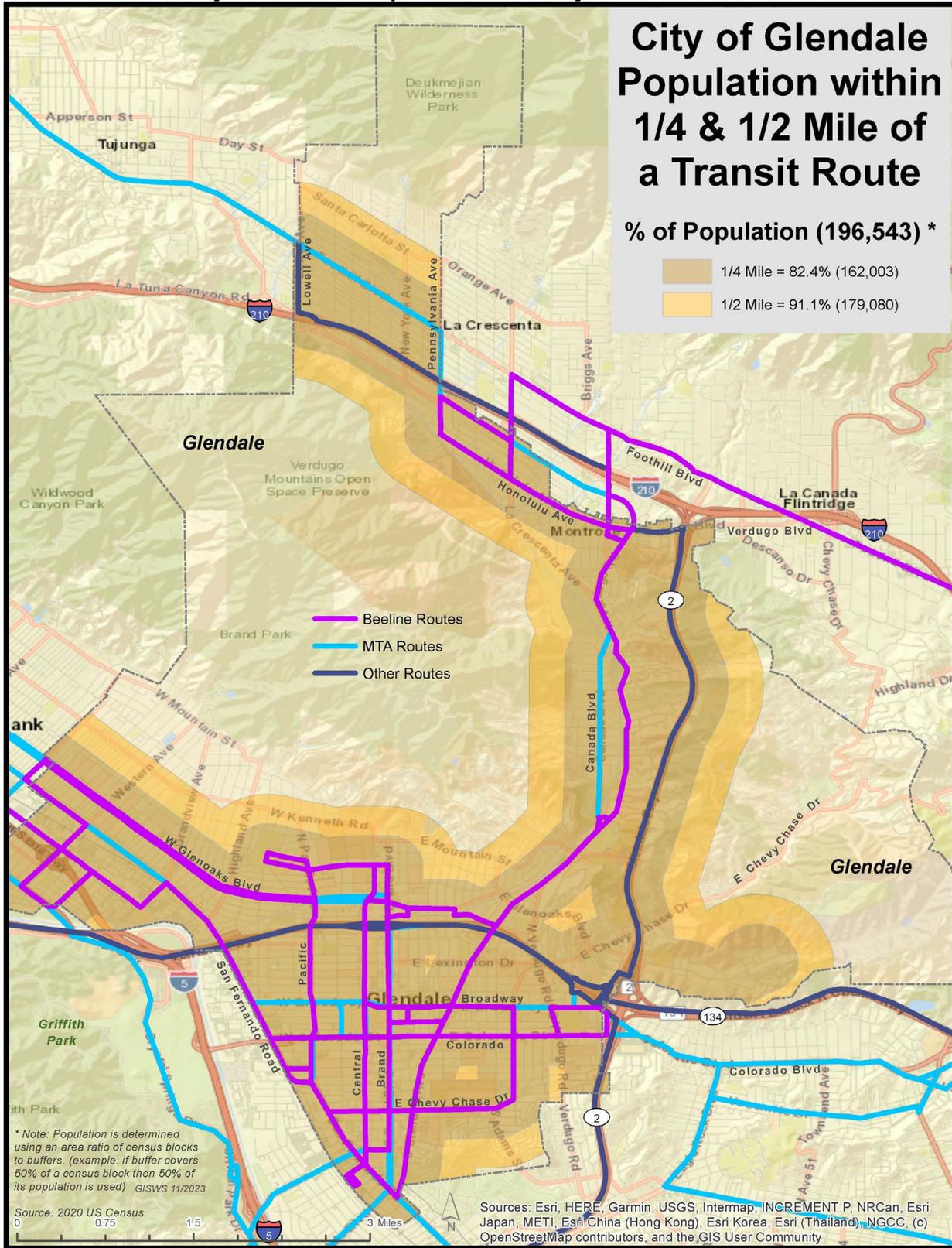
Fixed route on-time performance is defined as 90 percent on-time for each route, measured on all trips at all timepoints in the system. Beeline is considered on-time at 1 minute early and up to 5 minutes late at any timepoint. Route schedules were adjusted as needed to reflect actual running times.

Dial-A-Ride on-time performance is defined as 90 percent on-time for each trip. Dial-A-Ride is considered on-time at 10 minutes before and up to 20 minutes after a scheduled pick-up time.

d) Service Availability

The Beeline’s service area extends well beyond the City of Glendale. The proposed standard for service availability is that fixed route service should be distributed so that 85% of the residents of the City of Glendale have access to fixed route bus service within one-half mile. Because Metro service complements Beeline service, the City of Glendale considers all transit services when setting this performance standard. Figure 2 shows that 91.1 percent of the residents of the City of Glendale are within one-half mile of a transit route. The maximum distance between bus stops is no more than one-half mile. Dial-A-Ride service is available for 100% of the service area.

**Figure 2**  
**City of Glendale Population Proximity to Transit Routes**



## 8. Service Policies

The City of Glendale is required to adopt system-wide service policies necessary to guard against service design and operational policies that have disparate impacts. System-wide policies differ from service standards in that they are not necessary based on a quantitative threshold.

### a) Distribution of Transit Amenities

Each of the jurisdictions served by Glendale Beeline and Metro provide streetscape furnishings for use by the transit system. Approximately 31% of bus stop locations in the Beeline service area are furnished with shelters, and an additional 73% of stops are furnished with benches. The City of Glendale installs benches and trash receptacles at stops with medium and high levels of passenger activity as the right-of-way allows. Furnishings are distributed along all routes in the service area.

### b) Vehicle Assignment

Fixed route vehicles are randomly assigned from one garage, with the exception of LCF Shuttle vehicles that are assigned to the La Cañada Flintridge service. Smaller vehicles may be assigned to routes where turning radii require shorter vehicles. The City owns 41 and La Cañada Flintridge owns 3 heavy duty transit vehicles, as shown in Table 3.

The City of Glendale's fleet has an average age of 10.43 years. Thirty-five (35) vehicles are used in peak service.

**Table 3  
Fixed-Route Vehicle Inventory**

<b># of Buses</b>	<b>Manufacturer</b>	<b>Model</b>	<b>Year</b>	<b>Fuel Type</b>	<b>Seated Capacity</b>	<b>Standing Capacity</b>
2	New Flyer	C40LF	2005	CNG	40	65
7	New Flyer	C35LF	2009	CNG	30	55
2	New Flyer	C40LF	2009	CNG	40	54
4	New Flyer	C40LF	2012	CNG	40	69
10	New Flyer	C40LF	2013	CNG	38	73
9	New Flyer	XN40	2016	CNG	40	117
2	Gillig	40ILFBRT	2019	CNG	38	111
5	New Flyer	XN35	2020	CNG	32	65
1 – LCF	New Flyer	C35LF	2001	CNG	30	55
1 – LCF	New Flyer	C35LF	2009	CNG	30	55
1 – LCF	New Flyer	XN35	2016	CNG	30	55

The City of Glendale owns 10 Dial-A-Ride vehicles), as shown in Table 4. The average age of these vehicles is 9.7 years.

**Table 4  
Dial-A-Ride Vehicle Inventory**

# of Vehicles	Manufacturer	Model	Year	Fuel Type	Seats	Seats with Wheelchair
1	El Dorado Nat.	Uplander/American	2008	Gasoline	4	4+1
1	Ford/Braun	E350 Extended Body	2008	Gasoline	8	4+2
1	Ford/Braun	E350 Extended Body	2009	Gasoline	8	4+2
1	El Dorado Nat.	F550/Aero	2016	Gasoline	26	20-4
4	Dodge/Braun	Grand Caravan RT/ Entervan	2017	Gasoline	4	4+1
2	Chevy/ARBOC	Spirit of Mobility	2017	Gasoline	21	15+2

Since these vehicles are used in demand responsive service, they are randomly assigned daily trips as maintenance schedules allow. Six vehicles are used in peak service, depending on demand.

c) Transit Security

Both fixed route and paratransit vehicles are equipped with a surveillance system. Beeline and Dial-A-Ride staffs participate in ongoing safety and security training programs. If a security related incident occurs within the City of Glendale, dispatch will call the Glendale Police Department. If the incident occurs outside the City, dispatch will call the Los Angeles County Sheriff’s Department.

**9. Equity Analysis**

A Title VI Equity Analysis is required during the planning stage, for facilities for bus storage or maintenance or transit operations centers, “with regard to where a project is located or sited to ensure the location is selected without regard to race, color, or national origin.” The Glendale Beeline opened a new Beeline maintenance facility in 2020. The facility is located in an industrial area and complies with all zoning requirements of the City. Its location is very close to the previous facility.

**10. Documentation of Council Actions Related to Title VI**

An agency’s Title VI Program must be approved by the recipient’s appropriate governing entity responsible for policy decisions prior to submission to FTA. A copy of the resolution, motion, meeting minutes, or similar documentation to verify the governing entity’s consideration, awareness, and approval of Glendale’s Title VI Program will be included as Appendix C in this document.

## **APPENDIX A**

### Title VI Complaint Procedures

**City of Glendale, Public Works Department  
Transit Division**

**SOP for Title VI of the Civil Rights Act Complaint Procedures**

Updated 4-3-2024

**A. PURPOSE**

The purpose of this procedure is to provide guidance and instructions necessary to carry out the U.S. Department of Transportation's ("DOT" or the "Department") Title VI regulations (49 CFR part 21.9(b) regarding Title VI complaints and related recordkeeping. Please see Attachment A - *List of References* for regulatory policies.

**B. POLICY**

The City of Glendale 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 protected by Title VI of the Civil Rights Act of 1964, as amended.

Glendale Beeline and Glendale Dial-A-Ride

No person or group of persons will be discriminated against with regard to fares, routing, scheduling, or quality of transportation service that Glendale furnishes, on the basis of race, color, or national origin. In addition, the frequency of service, age and quality of Glendale vehicles assigned to routes, and location of routes will not be determined on the basis of race, color, or national origin.

**C. TITLE VI COMPLAINT PROCEDURES**

1. Who May File a Complaint

Any person who believes that they have, individually, or as a member of any specific class of persons, been subjected to discrimination on the basis of race, color, or national origin may file a Title VI complaint with the City of Glendale. A complaint must be filed within 180 days after the date of the alleged discrimination.

Written complaints may be filed with:

**City of Glendale  
Department of Public Works, Transit Division  
1759 Gardena Ave., 2<sup>nd</sup> Floor  
Glendale, CA 91204**

A *Title VI Complaint Form* may be used to file a complaint. See Attachment B.

In addition to the Title VI complaint process at the City of Glendale, a complainant may file a Title VI transit related complaint with the:

U.S. Department of Transportation

Federal Transit Administration  
Office of Civil Rights  
1200 New Jersey Ave SE  
Washington, DC 20590

2. How to File a Title VI Complaint

Any person who believes they have been discriminated against may file a signed, written complaint within one hundred and eighty (180) days of the date of alleged discrimination. The Public Works Department staff will assist with writing a complaint if the complainant is unable to do so.

The complaint should include the following information:

- Complainant name, address, and contact information (i.e., telephone number, email address, etc.)
- How, when, where, and why the complainant believes he/she was discriminated against. Include the location, names, and contact information of any witnesses.

The complaint may be filed in writing with the City of Glendale at:

**City of Glendale**  
**Department of Public Works, Transit Division**  
**1759 Gardena Ave., 2<sup>nd</sup> Floor**  
**Glendale, CA 91204**

Complainants may also file a Title VI transit related complaint with an external entity such as the FTA, other federal or state agency, or a federal or state court. However, should a complaint be filed with the City of Glendale and an external entity simultaneously, the external complaint will supersede the City complaint and the City's complaint procedures will be suspended pending the external entity's findings.

3. Processing Complaints

All complaints alleging discrimination based on race, color, or national origin in a service or benefit provided by the City of Glendale transit services will be recorded on the *Title VI Complaint Log*. See Attachment C for a sample of the log. The Public Works Department staff will provide appropriate assistance to complainants, including those persons with disabilities, or who are limited in their ability to communicate in English.

In instances where additional information is needed for assessment or investigation of the complaint, the Public Works Department staff will contact the complainant within 15 working days. Failure of the complainant to provide the requested information by a certain date may result in the administrative closure of the complaint.

The Public Works Department will investigate a written Title VI complaint within ten (10) working days of receiving the complaint. Based upon all of the information received, the Department will prepare a written response. The Department will send the response to the complainant and advise the complainant of his/her right to file a complaint externally.

The complainant also will be advised of his/her right to appeal the response to federal and state authorities as appropriate. The City of Glendale will use its best efforts to respond to a Title VI complaint within sixty (60) working days of its receipt of such a complaint, unless a complaint is filed with the City and an external entity simultaneously as noted previously.

**Attachment List**

Attachment A: *List of References*

Attachment B: *Title VI Complaint Form*

Attachment C: *Title VI Complaint Log*

Prepared By:

Martha D'Andrea, Transit Manager

**List of References**

- a. Title VI of the Civil Rights Act of 1964 (42 U.S.C. Section 2000d).
- b. Federal Transit Laws, as amended (49 U.S.C. Chapter 53 et seq.).
- c. DOT regulation, 49 CFR part 21, “Nondiscrimination in Federally-Assisted Programs of the Department of Transportation—Effectuation of Title VI of the Civil Rights Act of 1964” (June 18, 1970, unless otherwise noted).
- d. Section 12 of FTA’s Master Agreement, FTA MA 21 (October 1, 2014), or later.

**City of Glendale  
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 City of Glendale, Department of Public Works, Transit Division, 1759 Gardena Ave., 2<sup>nd</sup> Floor, Glendale, CA 91204**

1. Complainant’s Name \_\_\_\_\_  
Address: \_\_\_\_\_  
City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_  
Telephone (home): \_\_\_\_\_ (cell): \_\_\_\_\_  
Email: \_\_\_\_\_

2. Person discriminated against (if someone other than the complainant):  
Name: \_\_\_\_\_  
Address: \_\_\_\_\_  
City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_  
Telephone (home): \_\_\_\_\_ (cell): \_\_\_\_\_  
Email: \_\_\_\_\_

3. Which of the following best describes the reason you believe the discrimination took place? Was it because of your:  
a. Race/Color:   
b. National Origin:

4. What date did the alleged discrimination take place? \_\_\_\_\_

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



**City of Glendale  
Title VI Complaint Log**

In compliance with 49 CFR Section 21.9(b), the City of Glendale maintains a list of active title VI investigations related to the City's public transit program that allege discrimination on the basis of race, color, or national origin.

<b>Date Filed Complainant Status</b>	<b>Summary of Allegations</b>	<b>Actions Taken</b>

**APPENDIX B**

Limited English Proficiency (LEP) Plan

City of Glendale  
Department of Public Works, Transit Division



**Program to Meet Requirements  
Concerning Recipients' Responsibilities to  
Limited English Proficient (LEP) Persons  
As a Federal Transit Administration  
Subrecipient**

May 2024

## **I. INTRODUCTION AND PURPOSE**

The City of Glendale operates a local public transit system known as Glendale Beeline and a paratransit service for the elderly and disabled known as Dial-A-Ride. Both transit programs serve Glendale, La Canada Flintridge and the unincorporated areas of Montrose and La Crescenta with a population of approximately 237,000 residents. Beeline service is primarily a community circulator that supports the regional bus service operated by the Los Angeles County Transportation Authority (Metro).

The City of Glendale is a subgrantee to Metro by way of its Call for Projects grant making process and Section 5310 grant opportunities, and discretionary FTA grant programs which results in the award of federal funding. Due to its geographic location and population density, the transit service understandably has interactions with individuals with varying degrees of ability to speak and/or understand English. As a recipient of federal transit funding, the City of Glendale has developed this Limited English Proficiency (LEP) Plan to address the City's responsibilities to provide meaningful access to transit service by individuals with limited English language skills.

Glendale's LEP Plan is based on the U.S. Department of Transportation's policy guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons (DOT LEP Guidance, Federal Register, vol. 70, no. 239, pp. 74087–74100, December 14, 2005), the related handbook for Public Transit Providers prepared by the FTA Office of Civil Rights, April 13, 2007, and FTA Circular 4702.1B, dated October 1, 2012.

This LEP Plan will demonstrate the efforts that the City has undertaken to make its service as accessible as possible to all persons irrespective of their ability to communicate using the English language. Additionally, the City welcomes any comments or suggestions that would further improve the effectiveness of this LEP Plan. Comments or suggestions may be submitted at GlendaleBeeline.com or by calling 818-548-3960.

## **II. REGULATORY GUIDANCE**

Individuals, who have a limited ability to read, write, speak or understand English are Limited English Proficient or "LEP". The City utilized the U.S. Department of Transportation's (DOT) LEP Guidance Handbook and performed a four factor analysis to develop its LEP Plan. 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).

Executive Order 13166 of August 16, 2000 states that recipients of Federal financial assistance must take reasonable steps to ensure meaningful access to their programs and activities by LEP persons (Handbook, page 6) and that recipients should 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).

### **III. FOUR-FACTOR ANALYSIS**

The analysis provided in this report has been developed in order to ensure that the City provides language assistance to Limited English Proficient (LEP) persons. This analysis is based upon (and follows) the “Four Factor Analysis” presented in the *Implementing the Department of Transportation’s Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient (LEP) Persons*, dated April 13, 2007.

The analysis that follows has been completed to identify areas where the City can expect to encounter LEP individuals in its operation of transit services and to determine whether the City’s efforts are sufficient to ensure that LEP individuals are not prevented from using the services that the Glendale Beeline and Dial-A-Ride programs provide.

As part of the fourth factor of this analysis, this Plan will also include information on future goals and tasks for the City to pursue regarding community involvement.

*Factor 1: The Number and Proportion of LEP Persons Served or Encountered in the Eligible Service Population*

DOT guidance for this first factor says, “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.”

#### *A. How LEP individuals interact with the transit agency*

The City of Glendale has provided fixed route and paratransit service since 1984. In the course of providing this service, the City has interacted with individuals who have limited proficiency in English. Major points of contact with LEP individuals are the customer service call center and on fixed-route buses and demand response vehicles. In recent history, the most common languages spoken within the transit service area after English are Spanish and Armenian. The City has instituted a number of practices in order to ensure that all those seeking service from the City have access to Beeline and Dial-A-Ride information and services.

##### *1) Customer Service Call Center*

The customer service function is operated by transit staff trained to provide assistance to persons with limited English proficiency and to hearing impaired persons in a competent and effective manner to ensure their access to transportation services. The Customer Service Center is staffed with English, Spanish and Armenian speaking agents to respond to and assist non-English speaking and hearing-impaired customers. Third party live translation service is used for all other languages.

In FY 2022-23, the call center received a monthly average of 680 calls. On average, 136 calls per month were in languages other than English, with an average of 45 calls in Spanish and 91 calls in Armenian. There were zero calls received in a language other than English, Spanish, or Armenian.

##### *2) Drivers*

Most Beeline and Dial-A-Ride drivers speak a language other than English and can answer service questions in the field from customers.

*B: Identification of LEP communities, and assessing the number or proportion of LEP persons from each language group to determine the appropriate language services for each language group*

The U.S. Census Bureau compiles data in its American Community Survey (ACS). Among the data collected is information on primary language spoken at home and the ability to speak English. Categories include whether individuals indicate they speak English “very well” or “less than very well.” This report uses the 2022 American Community Survey 5-Year Estimates as the basis for much of the analysis that follows. The LEP population consists of those individuals who speak other languages AND speak English “less than very well.”

Table 6 provides information on the LEP population in the Beeline service area. Figure 3 shows a map of the Beeline service area. As presented in Table 5, 27.8% (or 62,170) of the 223,615 9 residents over 5 years old within the Glendale Beeline service area reported that they spoke English less than “very well.” Of those residents who do not speak English very well, over half (13.7% of the total service area population or 30,745 individuals) indicated that they were able to communicate in Armenian and an additional 4.6% of the total service area population (or 10,246 individuals) indicated that they were able to communicate in Spanish.

The FTA Title VI guidance refers to the US Department of Justice Safe Harbor Provision, which has been adopted by USDOT. The Safe Harbor Provision stipulates that “if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with the recipient’s written translation obligations.” Under this provision, the Glendale Beeline would offer strong evidence of compliance with LEP requirements if it provides translations of its vital documents into Armenian and Spanish.

It would be financially burdensome for the Glendale Beeline to translate vital documents into the other languages listed in Table 5 (Korean, Tagalog, Chinese, Russian, Arabic, and Persian). The agency’s policy is to offer oral translations if there is ever a request for translation into these languages.

**Table 5  
Language Proficiency in the Beeline Service Area**

<b>Languages Spoken and English Proficiency</b>	<b>Population Age 5 and Over</b>	<b>Percent of Population Age 5 and Over</b>
All languages	223,615	100.0%
English only	85,750	38.3%
Language other than English	137,865	61.7%
<b>Speak English less than “very well:”</b>	<b>62,170</b>	<b>27.8%</b>

Armenian*	69,175	30.9%
<b>Speak English less than “very well:”***</b>	<b>30,745</b>	<b>13.7%</b>
Spanish	29,167	13.0%
<b>Speak English less than “very well:”</b>	<b>10,246</b>	<b>4.6%</b>
Korean	10,495	4.7%
<b>Speak English less than “very well:”</b>	<b>5,884</b>	<b>2.6%</b>
Tagalog	8,225	3.7%
<b>Speak English less than “very well:”</b>	<b>2,688</b>	<b>1.2%</b>
Russian**	3,428	1.5%
<b>Speak English less than “very well:”</b>	<b>1,559</b>	<b>0.7%</b>
Chinese	3,353	1.5%
<b>Speak English less than “very well:”***</b>	<b>1,354</b>	<b>0.6%</b>
Arabic	2,916	1.3%
<b>Speak English less than “very well:”</b>	<b>1,357</b>	<b>0.6%</b>
Persian*	2,423	1.1%
<b>Speak English less than “very well:”***</b>	<b>969</b>	<b>0.4%</b>

Source: U.S. Census Bureau, 2022 Five-Year American Community Survey, Table B16001  
Languages spoken by at least one thousand persons shown individually

\*Armenian and Persian not broken out in 2022, all speakers estimated using percentage of all languages classified as Indo-European from 2015

\*\*Russian not broken out in 2022, estimated using percentage of Russian, Polish, or other Slavic languages from 2015

\*\*\*Speak English less than “very well” calculated using percentages from 2022 Five-Year American Community Survey, Table B16001 for Los Angeles-Long Beach-Glendale, Metro Division

**Figure 3  
Glendale Beeline Service Area**

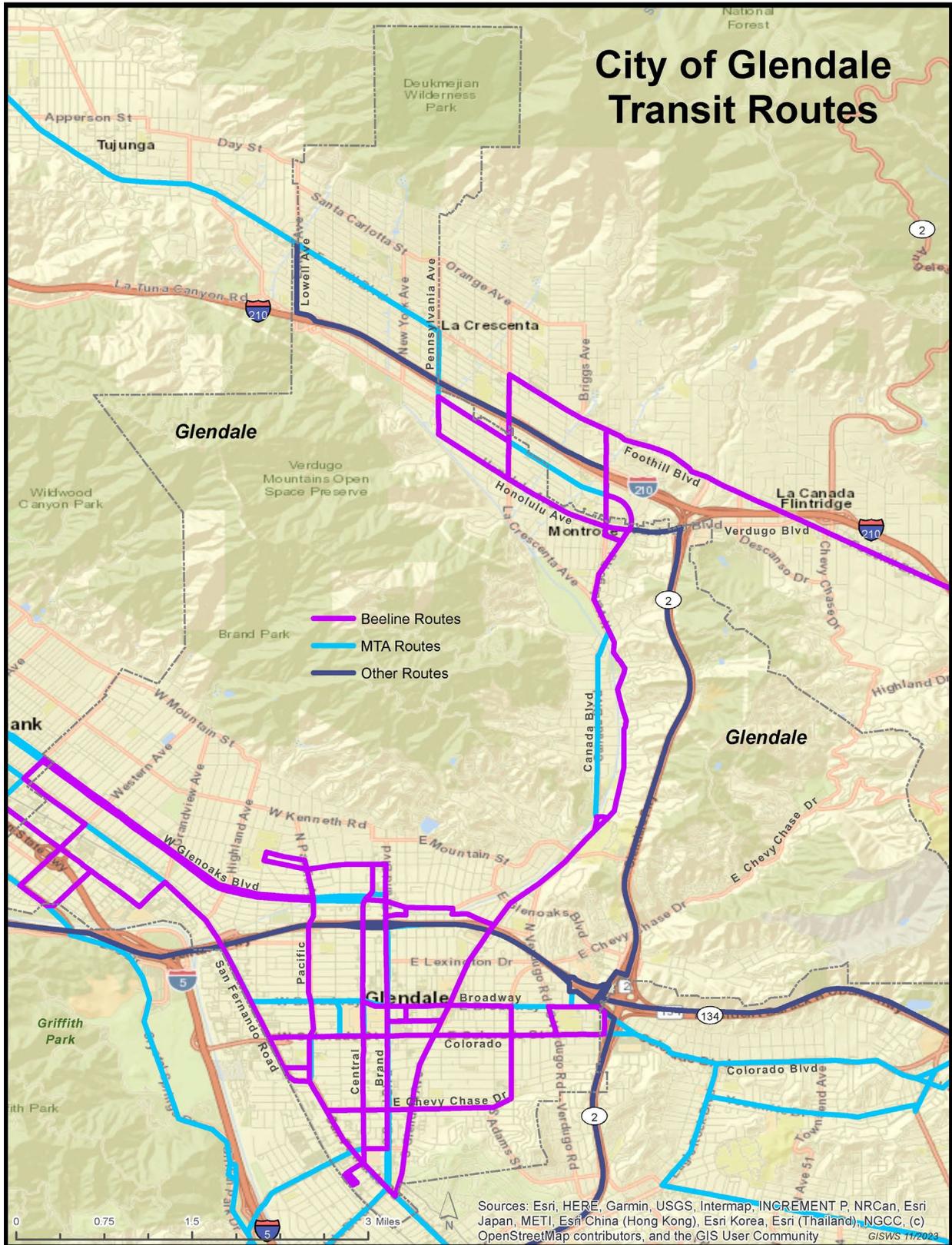


Table 6 presents the data for LEP populations in the Beeline service area by census tract.

**Table 6  
LEP Populations in the Beeline Service Area by Language and Census Tract**

Census Tract	Population for Whom Language Is Determined	% Armenian LEP	% Spanish LEP	% Korean LEP	% Tagalog LEP	% Russian LEP	% Chinese LEP	% Arabic LEP	% Persian LEP
3001	6565	5.4%	2.4%	7.8%	0.0%	0.0%	0.0%	0.1%	0.2%
3002	5010	3.1%	0.9%	7.9%	0.1%	0.0%	0.2%	0.0%	0.1%
3003.01	6039	13.4%	0.4%	6.5%	0.0%	0.7%	0.5%	0.5%	0.4%
3004	5204	3.6%	1.8%	11.3%	1.0%	0.0%	0.8%	0.2%	0.1%
3005.01	2710	4.1%	3.4%	6.6%	0.0%	0.0%	0.3%	0.6%	0.1%
3005.02	4853	4.4%	2.4%	10.0%	0.2%	0.5%	1.2%	0.5%	0.1%
3006.01	5663	9.4%	5.7%	8.1%	0.1%	0.4%	0.0%	0.1%	0.3%
3006.02	3128	4.7%	1.3%	1.0%	0.0%	2.2%	0.0%	0.0%	0.1%
3007.01	4880	17.9%	0.8%	1.8%	0.3%	0.0%	0.3%	0.2%	0.6%
3007.02	5569	21.4%	1.6%	2.3%	0.0%	0.9%	1.1%	0.6%	0.7%
3008	6871	8.9%	0.5%	2.0%	0.0%	1.2%	0.0%	0.0%	0.3%
3009.01	5112	9.2%	0.0%	3.7%	0.0%	0.8%	2.4%	3.8%	0.3%
3009.02	1996	12.9%	1.2%	1.8%	1.5%	0.2%	0.8%	0.5%	0.4%
3010	5018	15.8%	2.3%	0.2%	1.3%	0.4%	0.0%	0.7%	0.5%
3011	6712	16.3%	1.4%	1.4%	0.1%	0.6%	0.1%	1.2%	0.5%
3012.03	3877	18.8%	0.8%	2.5%	0.2%	0.8%	0.6%	0.3%	0.6%
3012.04	4702	15.5%	5.3%	2.0%	2.5%	0.9%	0.5%	0.4%	0.5%
3012.05	1978	19.2%	2.0%	0.3%	0.6%	1.2%	0.7%	0.4%	0.6%
3012.06	5183	23.3%	0.9%	0.8%	0.7%	0.0%	0.3%	1.7%	0.7%
3013	1917	11.4%	0.6%	1.1%	0.0%	2.3%	0.0%	0.0%	0.4%
3014	3613	19.8%	2.1%	0.0%	0.0%	0.6%	0.0%	0.0%	0.6%
3015.01	1685	25.0%	2.6%	0.0%	0.0%	0.1%	0.0%	0.0%	0.8%
3015.02	6960	26.4%	1.3%	0.6%	0.0%	1.3%	0.3%	0.0%	0.8%
3016.01	5218	24.0%	7.4%	0.0%	0.5%	1.2%	0.0%	0.0%	0.8%
3016.02	3708	5.2%	14.5%	1.2%	1.7%	0.3%	0.0%	0.0%	0.2%
3017.01	2605	14.4%	4.4%	3.9%	0.2%	0.0%	0.1%	0.0%	0.5%
3017.02	5885	18.6%	7.1%	3.0%	2.5%	0.3%	0.0%	1.0%	0.6%
3018.01	5212	12.5%	2.7%	0.7%	1.8%	1.2%	0.7%	1.9%	0.4%
3018.02	5287	13.5%	7.3%	1.5%	2.0%	1.4%	1.0%	0.0%	0.4%
3019.01	4001	22.8%	2.5%	0.0%	0.0%	0.8%	1.5%	2.2%	0.7%
3019.02	3199	18.5%	0.8%	2.7%	3.3%	0.7%	10.6%	0.6%	0.6%
3020.02	3700	16.5%	2.7%	0.0%	4.3%	1.2%	0.5%	4.1%	0.5%
3020.03	3499	25.9%	1.9%	0.0%	1.3%	0.5%	0.0%	0.5%	0.8%
3020.04	3897	21.2%	7.4%	0.0%	1.9%	0.1%	0.0%	0.0%	0.7%
3021.02	5327	15.1%	6.0%	0.4%	0.9%	1.0%	0.5%	0.0%	0.5%
3021.03	4867	18.8%	5.5%	0.5%	1.0%	1.4%	0.2%	0.6%	0.6%
3021.04	3407	9.7%	9.4%	0.7%	6.1%	0.4%	0.0%	0.0%	0.3%
3022.01	3643	23.4%	3.6%	0.2%	1.5%	1.1%	0.0%	1.3%	0.7%

**Table 6 continued**  
**LEP Populations in the Beeline Service Area by Language and Census Tract**

Census Tract		% Armenian LEP	% Spanish LEP	% Korean LEP	% Tagalog LEP	% Russian LEP	% Chinese LEP	% Arabic LEP	% Persian LEP
3022.02	4989	20.7%	6.2%	0.5%	3.5%	0.3%	0.3%	1.7%	0.7%
3023.01	3538	15.1%	7.2%	1.8%	2.7%	0.6%	0.5%	1.4%	0.5%
3023.03	5157	9.8%	18.6%	1.4%	5.9%	0.7%	0.7%	0.6%	0.3%
3024.01	6987	10.1%	19.9%	2.2%	1.8%	0.5%	0.3%	0.0%	0.3%
3025.03	3800	19.2%	9.3%	0.0%	2.8%	1.1%	0.0%	0.3%	0.6%
3025.04	3615	15.5%	14.7%	0.2%	1.3%	1.0%	0.7%	0.6%	0.5%
3025.03	4177	19.5%	14.5%	0.0%	7.0%	1.3%	0.0%	0.0%	0.6%
3025.06	3184	6.5%	4.4%	0.3%	1.3%	2.6%	0.0%	0.7%	0.2%
4605.01	5116	3.3%	0.4%	5.8%	0.0%	0.0%	2.5%	0.0%	0.1%
4605.02	4497	1.0%	0.4%	4.8%	0.0%	0.0%	0.3%	0.0%	0.0%
4606	4901	6.3%	1.5%	6.5%	0.0%	0.8%	0.4%	0.4%	0.2%
4607	4954	0.1%	0.1%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%
<b>Total</b>	<b>223615</b>	<b>13.7%</b>	<b>4.6%</b>	<b>2.6%</b>	<b>1.2%</b>	<b>0.7%</b>	<b>0.6%</b>	<b>0.6%</b>	<b>0.4%</b>

*C. Literacy Skills of LEP populations*

The Glendale Beeline has no direct evidence of the literacy skills of LEP populations in their native languages. In the absence of such evidence, translation of documents is assumed to be an effective practice.

*D. Whether LEP persons are underserved due to language barriers*

The Glendale Beeline has no direct evidence of language barriers resulting in the LEP population being underserved. As shown in Table 5 earlier, the primary languages spoken by the LEP population is Armenian, followed by Spanish. All key documents are currently provided in both languages. As noted above, there are very few occasions when a call is received in a language other than English, Armenian, or Spanish at the customer service call center.

In summary, the City has taken steps to ensure that service area residents wishing to speak with a Customer Services representative will be able to do so in a language that they speak well, either directly or through a third-party translation service.

*Factor 2: The Frequency with Which LEP Individuals Come into Contact with the Program*

The Federal guidance for this factor recommends that agencies should assess major points of contact with LEP individuals. The assumption is that the more frequent the contact with a particular LEP language group, the more likely enhanced services will be needed.

*A. Use of Bus and Dial-a-Ride Service*

As noted earlier, one major point of contact with LEP individuals is on-board fixed-route buses and Dial-A-Ride vans. Most Beeline and Dial-A-Ride drivers speak a language other than English and can answer service questions from customers while in the field.

**B. Purchase of Passes and Tickets**

Beeline passes are sold at various locations throughout Glendale. All City and school district locations have sales personnel that speak multiple languages. Most commercial pass sales locations in Glendale provide English/Spanish and English/Armenian language assistance at each location.

**C. Participation in Public Meetings**

As part of the 2019 Transit Route Analysis, a multi-lingual, community-wide online survey (e-survey) was conducted to obtain input from the Glendale community and individuals who travel within and through Glendale. To encourage participation by Limited English Proficient (LEP) individuals, all materials, including the widely distributed postcards, included information in Armenian and Spanish, and a flyer with survey information in Armenian, English, and Spanish was distributed to interested organizations and churches that serve LEP individuals. Table 7 presents e-survey responses by language.

**Table 7  
E-Survey Responses by Language**

<b>Language</b>	<b>Total Number of Responses</b>	<b>Percentage of Responses</b>
English	784	96%
Spanish	24	3%
Armenian	11	1%
Total	819	100%

Source: 2019 E-Survey

A second phase of outreach to stakeholders and the public was conducted to invite input on proposed changes to the Beeline. As part of this effort, five focus groups were conducted: one included ESL students at the Glendale Community College Garfield campus and another was composed of Armenian speakers and LEP individuals at the Armenian Relief Society. The Beeline received numerous public comments on proposed changes by email, phone, and mail; these were not tracked by language. In response to public comments, the project team made changes to the proposals for Routes 1, 2, 8, and 32 and for the evening pilot A extending hours for late classes at GCC on Monday through Thursday.

Typically, public meetings are scheduled only when major changes to service or fares are proposed. This is an infrequent source of contact, but the Beeline will keep track of LEP participation by language in future public meetings.

City staff has also conducted outreach efforts to senior centers, churches, and civic organizations within the service area. Personnel from the City's Public Works Department have appeared as guests on one or more of the Armenian cable television networks.

**D. Customer Service Interactions**

A major point of contact with LEP individuals is the customer service telephone center. The customer service center averages 45 calls in Spanish per month and 91 calls in Armenian per month.

E. *Ridership Surveys*

The Beeline generally conducts ridership surveys every five years as part of its *Line-by-Line Analysis*, although the pandemic disrupted this schedule. The most recent on-board survey was conducted in English, Armenian, and Spanish in November 2018. Topics included trip origins and destinations, extent and history of transit use, customer satisfaction with various service elements and overall service, desired improvements, and rider demographics.

Table 8 shows the number of surveys returned by language. Fourteen percent of the surveys were completed in either Spanish or Armenian. Taken together, respondents completing the survey in a language other than English may be considered the LEP population.

**Table 8**  
**On-Board Surveys Returned by Language**

Language	Number of Responses	Percentage of Responses
English	668	86%
Spanish	85	11%
Armenian	26	3%
Total	779	100%

Source: 2018 On-board Survey

Table 9 shows trip purpose by language group. LEP persons were much more likely to be traveling for shopping and much less likely to be traveling for school.

**Table 9**  
**Trip Purpose by Language Group**

Trip Purpose	English	LEP
Work	39%	36%
School	26%	16%
Shopping	13%	24%
Visit/personal	7%	10%
Medical	4%	7%
Other	11%	8%
Total	100%	100%

Source: 2018 On-board Survey  
Totals may not add to 100 percent due to rounding

Table 10 shows age by language group. LEP persons were much more likely to be in the two older age groups (25 to 61 and 62 and older), explaining their greater propensity to travel for shopping and for medical purposes and their lesser propensity to travel for school.

**Table 10  
Age by Language Group**

Age	English	LEP
17 and under	22%	8%
18 to 24	17%	5%
25 to 61	45%	53%
62 and older	16%	34%
Total	100%	100%

Source: 2018 On-board Survey

Table 11 presents the average overall rating for Beeline service by language group. Ratings were on a scale of 1 to 4, with 1 being “very poor” and 4 being “excellent.” The average overall ratings were similar among the LEP and English groups.

**Table 11  
Overall Rating for Beeline  
Service by Language Group**

Language Group	Average Rating
English	3.58
LEP	3.55
Total	3.57

Source: 2018 On-board Survey

**F. Operator Surveys**

Operator surveys are not a point of contact for LEP individuals. The Beeline has never conducted an operator survey.

The results for Factor 2 indicate frequent contact with Spanish-speaking individuals, occasional contact with Armenian-speaking individuals, and limited contact with other LEP individuals.

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

The Federal guidance states that the provision of public transportation is a vital service, especially for people without access to a vehicle. The Federal guidance also notes that “a coordinated plan to meet the specific transportation needs of seniors and persons with disabilities will often also meet the needs of LEP persons.”

The Glendale Beeline fixed-route service is our most critical service, followed by Dial-A-Ride service to over 3,000 registered elderly or disabled clients. It should be noted that Access services provides the ADA complementary service throughout Los Angeles County, including the Beeline service area.

*Factor 4: The Resources Available to the Recipient for LEP Outreach and Associated Costs*

This section of the Four-Factor Analysis allows the City to present proposed efforts to provide further access for LEP individuals for the agency’s services. The Federal guidance looks to evaluate the proposed improvements against the level of resources available in an agency’s

budget to provide meaningful access for LEP individuals. The guidance notes that “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.”

Production of major documents in six languages other than the current English, Armenian, and Spanish will result in an increase in printing and marketing costs for the City. The City of Glendale’s website uses Google Translator to translate anything on the website into any supported language. The City also has voice translating capabilities for calls. The Glendale Beeline proposes to continue to provide access for LEP individuals via website and voice translation. The website translation of major documents will be printed and copies will be available at the Beeline office.

Expanded outreach efforts to LEP populations would require staff time and may require the use of translation services. Community and advocacy groups may be able to assist with translation.

#### **IV. Conclusion to Limited English Proficiency Plan**

The City provides fixed-route and paratransit service to an area including the City of Glendale, La Cañada Flintridge, and the unincorporated areas of La Crescenta and Montrose. In the transit service area, according to 2022 5-year American Community Survey data, 62,170 residents or 27.8% describe themselves as not able to communicate in English very well. Armenian-speaking residents account for 30,745 of this group, 13.7 percent of the total population, followed by Spanish-speaking residents (10,246 or 4.6 percent of the total population) and Korean-speaking residents (5,884 or 2.6 percent of the total population). The majority of the City’s interactions with individuals who were LEP are with individuals who speak Armenian or Spanish as their primary language. The City has adapted its language services to require telephone operators in the Customer Service function to be bilingual in either English and Spanish or English and Armenian.

The City has taken steps to ensure that all service area residents will be able to talk to a Customer Services representative in a language that they speak well, either directly or through a telephone translation service. The City also uses Google Translator to translate anything on the website into any supported language.

The community groups contacted by Beeline staff have not indicated any problems among their members in terms of utilizing Beeline services or communicating with customer service representatives. The Glendale Beeline will take advantage of opportunities over the next year to expand its contact with non-English speakers.

The Beeline conducted an on-board survey (in English, Armenian, and Spanish) of its existing ridership to determine trip origins and destinations, extent and history of transit use, customer satisfaction with various service elements and overall, and desired improvements, and rider demographics. Fourteen percent of the surveys were completed in either Spanish or Armenian. Some differences in use were noted among the LEP population, primarily related to age (LEP respondents were older). The overall rating of Beeline service was very similar among the LEP (3.55 on a scale of 1 to 4) and non-LEP (3.58) groups.

The analysis of the 2022 5-year American Community Survey data, the review of Customer Service experience, and the results of community outreach suggest that translation into six additional languages by use of Google Translator on the website and a voice translation program

for telephone continues to be appropriate. Major documents such as Title VI notices, service and fare changes will be translated on the website via Google Translator and printed in nine languages. The City will note the availability of major documents in these languages and will keep a reasonable supply of major documents in each language. The City will continue to take advantage of community outreach efforts to communicate with LEP individuals and groups and will encourage community groups to provide an interpreter to help individuals who do not speak English well in obtaining transit information from the City.

## ***V. Language Assistance Plan***

### ***Introduction***

In developing a Limited English Proficiency Plan, FTA guidance recommends the analysis of an implementation plan. Generally, these Language Assistance Plans include the following five elements: 1) Describing LEP populations served; 2) Providing language assistance services by language; 3) Providing notice to LEP persons; 4) Monitoring and updating the plan; and 5) Training staff. Below, each of these five elements is addressed.

### ***Element 1: Describing LEP Populations Served***

This element relies on the analysis conducted during the LEP four-factor analysis. The City has identified the number and proportion of LEP individuals within its service area. As presented in Tables 5 and 6, 37 percent of the service area population speaks English only. The largest non-English languages spoken in service area are Armenian (31 percent) and Spanish (13 percent). The LEP population consists of those individuals who speak other languages AND speak English “less than very well.” As noted earlier, the DOJ Safe Harbor Provision stipulates that “if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with the recipient’s written translation obligations.” The Glendale Beeline offers strong evidence of compliance with LEP requirements if it provides translations of its vital documents into:

- Armenian
- Spanish

It would be financially burdensome for the Glendale Beeline to translate vital documents into the other languages listed above in Table 5 (Korean, Tagalog, Chinese, Russian, Arabic, and Persian). The agency’s policy is to offer oral translations if there is ever a request for translation into these languages.

### ***Element 2: Language Assistance Measures***

Because of the large Armenian and Spanish speaking populations in the transit service area, the Beeline has printed its key information in transit documents in English, Armenian and Spanish to address the community’s need. The Beeline has added the six other languages shown above to the list of languages in which key documents are translated on the website and then printed. The City provides voice translation for telephone conversations. The Beeline will take advantage of opportunities to expand its outreach to community groups representing LEP populations.

### ***Element 3: Providing Notice to LEP Persons***

Federal guidance provides that once an agency has decided that it will provide language services, it is important that the recipient notify LEP persons of services available free of charge. An agency can provide such information by using some of the following methods: posting signs in intake areas or entry points, stating in outreach documents that language services are available; using an automated telephone voice mail attendant or menu system.

Currently all brochures/timetables have a statement in Armenian and Spanish to call the customer service number for more information. Translation options are available on the City's website and via voice translators for telephone conversations.

### ***Element 4: Monitoring and Updating the LEP Plan***

As mentioned in the four-factor analysis, there are several actions that the City intends to continue during the life of this plan. City staff will continue to:

- Keep a log of customer service call center transactions in languages other than English;
- Review the log annually to identify emerging LEP populations; and
- Seek advice from and accept requests to meet with community groups who work with LEP populations regarding the best means to communicate with these populations.

Additional improvements may be required as demographics change throughout the transit service area in the years ahead. This Beeline's LEP Plan confirms through a review of current census records that no additional languages need to be added to the list of languages requiring translation.

### ***Element 5: Training Staff***

Federal guidance states that staff members of an agency should know their obligations to provide meaningful access to information and services for LEP persons and that all employees in public contact positions should be properly trained. Suggestions for implementing this element of the Language Assistance Plan, involve (1) identifying agency staff likely to come into contact with LEP individuals; (2) identify existing staff training opportunities and provide regular re-training for staff for dealing with LEP individual needs; and (3) design and implement LEP training for agency staff.

In the case of the Beeline's transit service, the most important staff training is for customer service representatives. All customer service representatives and any other personnel that come in contact with the public receive annual training. All staff is trained to coordinate language services to provide exceptional customer service to persons with limited English proficiency.

The Beeline understands the value that its service plays in the lives of individuals who rely on this service, and the importance of any measures undertaken to make that use of system easier. The Beeline is open to suggestions from any quarter, including customers, other transportation agencies with similar experiences with LEP communities, and the general public, regarding additional methods to improve their accessibility to LEP communities.

For many LEP individuals, public transit is a principal transportation mode used. It is important that Glendale Beeline and Dial-A-Ride be able to communicate effectively with all its passengers,

both LEP and non-LEP individuals alike. When program staffs are able to communicate effectively with all of their customers, the service provided is more effective, convenient and accessible for all of the agency's customers. The City of Glendale is committed to taking those reasonable steps to ensure meaningful access for LEP individuals to transit services.

## **Appendix C**

### Documentation of Council Action Related to Title VI