City of Moreno Valley

TITLE VI PROGRAM

Updated: September 02, 2025
Approved by City of Moreno Valley City Council:

City of Moreno Valley 14177 Frederick Street Moreno Valley, CA 92553 (909) 413-3000 https://moval.gov



INTRODUCTION

This document was prepared by the City of Moreno Valley 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 Requirement and Guidelines for Federal Transit Administration Recipients."



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City of Moreno Valley Title VI Notice to the Public - English

Notifying the Public of Rights Under Title VI

City of Moreno Valley

- City of Moreno Valley operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with City of Moreno Valley.
- For more information on City of Moreno Valley civil rights program, and the procedures to file a complaint, contact Human Resources Division Manager, or visit our administrative office at 14177 Frederick Street, Moreno Valley, CA 92553. For more information, visit HR@moval.org
 - A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590
 - If information is needed in another language, contact (951) 413-3045.



City of Moreno Valley Title VI Notice to the Public - Espanol

Notificar al público de los derechos bajo el título VI

Ciudad de Moreno Valley

- La Ciudad de Moreno Valley administra sus programas y servicios sin distinción de raza, color y origen nacional con conforme al Título VI de la Ley Civil de Derechos. Cualquier persona que cree que él o ella ha sido agraviado por cualquier práctica discriminatoria ilegal bajo el título VI puede presentar una queja con la Ciudad de Moreno Valley.
- Para obtener más información sobre la Ciudad de Moreno Valley, el programa derechos civiles y los procedimientos para presentar una queja, llame al (559) 651-8150, o visite nuestra oficina administrativa en 14177 Frederick Street, Moreno Valley, CA 92553.

Para más información puede enviar un correo electrónico a HR@moval.org.

• Un denunciante puede presentar una queja directamente ante la Administración Federal de Transporte al presentar una que ante la Oficina de Derechos Civiles.

A la atención de: Title VI Program Coordinator, East Building, 5th Floor-TCR,

1200 New Jersey Ave., SE, Washington, DC 20590

• Si se necesita información en otro idioma, contacte al (951) 413-3045



List of Locations Where Title VI Notice Is Posted

City of Moreno Valley notice to the public is currently posted at the following locations:

Location Name	Address	City
Moreno Valley City Hall	14177 Frederick Street	Moreno Valley

Future vehicle	14177 Frederick Street	Moreno Valley

The Title VI notice and program information is also provided on City of Moreno Valley's website at https://moval.gov/city_hall/ada-title-vi.html

Title VI Complaint Procedures

As a recipient of federal dollars, City of Moreno Valley is required to comply with Title VI of the Civil Rights Act of 1964 and ensure that services and benefits are provided on a non-discriminatory basis. The City of Moreno Valley has in place a Title VI Complaint Procedure, which outlines a process for local disposition of Title VI complaints and is consistent with guidelines found in the Federal Transit Administration Circular 4702.1B, dated October 1, 2012.

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by City of Moreno Valley may file a Title VI complaint by completing

and submitting the agency's Title VI Complaint Form. The City of Moreno Valley investigates complaints received no more than 180 days after the alleged incident. The City of Moreno Valley will only process complaints that are complete.

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

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

The case can be administratively closed also if the complainant no longer wishes to pursue their case. After the investigator reviews the complaint, she/he will issue one of two letters to the complainant: a closure letter or a Letter of Finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. An LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member, or other action will occur. If the complainant wishes to appeal the decision, she/he has 10 business days after the date of the letter or the LOF to do so.

A person may also file a complaint directly with the Federal Transit Administration, at FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.

City of Moreno Valley Title VI Complaint Form - English

Section I: Please write leg	gibly		
1. Name:			
2. Address:			
3. Telephone:		3.a. Secondary Phone (Optional):	
4. Email Address:			
5. Accessible Format Requirements?	[] Large Print	[] Audio Tape	
	[] TDD	[] Other	
Section II:			

6. Are you filing this complaint or	your own behalf?	YES*	NO	
*If you answered "yes" to #6, go to Section III.				
7. If you answered "no" to #6, wh	at is the name of the person for wh	om you are filing	this complaint? Name:	
8. What is your relationship with	this individual:			
9. Please explain why you have t	iled for a third party:			
10. Please confirm that you have aggrieved party to file on their be		YES	NO	
Section III:			·	
11. I believe the discrimination I	experienced was based on (check a	all that apply):		
[] Race	[] Color] National Origin	
12. Date of alleged discrimination	n: (mm/dd/yyyy)			
were involved. Include the name	e what happened and why you belice and contact information of the pers of any witnesses. If more space is n	son(s) who discrir	ninated against you (if known), as	
Section IV:				
14. Have you previously filed a T	itle VI complaint with the City of Mo	oreno Valley?[]	Yes []No	
Section V:				
15. Have you filed this complaint	with any other Federal, State, or lo	cal agency, or w	th any Federal or State court? []	Yes []
If yes, check all that apply:				
[] Federal Agency [] State Agency [] Federal Court [] State Court [] Local Agency 16. If you answered "yes" to #15, provide information about a contact person at the agency/court where the complaint was filed.				
Name/Title:		-		
Agency: Address:				
Telephone/Email: Section VI:				
Section vi.				
Name of Transit Agency complai Contact Person:	nt is against:			
Telephone:				
You may attach any writte complaint.	en materials or other inform	nation that yo	u think is relevant to you	r
Signature and date are re	quired below to complete	the form:		
Signature			Date	

Please submit this form in person or mail this form to the address below: Moreno Valley City Hall, Title VI Coordinator 14177 Frederick Street Moreno Valley, CA 92553

Título VI Procedimiento de Queja

Como un beneficiario de fondos federales, la Ciudad de Moreno Valley. Está obligada a cumplir con el Título VI de la Ley de Derechos Civiles de 1964 y a garantizar que los servicios y beneficios se proporcionen de manera no discriminatoria. La Ciudad de Moreno Valley cuenta con un procedimiento para quejas bajo el Título VI, que establece un proceso para la resolución local de quejas relacionadas con el Título VI y conforme con las normas contenidas en la Circular 4702.1B de la Administración Federal de Transporte, con fecha del 1 de octubre de 2012.

Cualquier persona que cree que ha sido objeto de discriminación por motivos de raza, color, u origen nacional por la Ciudad de Moreno Valley puede presentar al Título VI su denuncia. La Ciudad de Moreno Valley investiga las quejas no más de 180 días después del incidente. La Ciudad de Moreno Valley solo tramitara las quejas que están completas.

Después de 10 días hábiles de haber recibido la demanda, la Ciudad de Moreno Valley la revisará para determinar si nuestra oficina tiene jurisdicción. El denunciante de la queja recibirá una carta informándole que será notificado por escrito si el caso de él/ella el será investigado por nuestra oficina. La Ciudad de Moreno Valley tiene 30 días para investigar la queja.

Si se necesita más información para resolver el caso, la Ciudad de Moreno Valley puede contactar al autor de la queja. El autor de la queja tiene 10 días hábiles a partir de la fecha que recibió la carta para solicitar un investigador que sea asignado al caso. Si el investigador no es contactado por el denunciante o no recibe la información adicional dentro de los 10 días hábiles, la Ciudad de Moreno Valley puede cerrar el caso de manera administrativa.

Un caso también puede cerrarse administrativamente si el denunciante ya no desea continuar con su caso. Después de que el investigador revise la queja, él o ella emitirá una de dos cartas al denunciante: una carta de cierre o una carta de conclusión (LOF). Una carta de cierre resume las alegaciones y establece que no hubo una violación del Título VI y que el caso será cerrado. Una carta de conclusión (LOF) resume las alegaciones y las entrevistas relacionadas con el incidente denunciado, y explica si se tomará alguna acción disciplinaria, capacitación adicional para el miembro del personal u otra medida. Si el denunciante desea apelar la decisión, tiene 10 días hábiles después de la fecha de la carta o del LOF para hacerlo.

Una persona también puede presentar una queja directamente ante la Administración Federal de Transporte, en la Oficina de Derechos Civiles de la FTA, ubicada en 1200 New Jersey Avenue SE, Washington, DC 20590.

Formulario de Quejas del Título VI de la Ciudad de Moreno Valley - Español

Formulatio de Quejas del Titulo VI de la Ciddad de Morello Valley - Español				
Sección I: Escribir en forma	legible			
1. Nombre:				
2. Dirección:				
3. Teléfono:		3.a. Teléfono sec	undario(opcional):	
4. Dirección de correo electrór	nico:			
5.Reuistos de forma	[] Impresión grande		[] Cinta de audio	
accesible?	[] TDD		[] Otros	
Sección II:				
6.Está presentando esta queja en su propio nombre?		re?	Si	No
*Si usted contesto "Si" a #6, va	aya a la Sección III.			
7. Si respondió "no" a la preg	unta 6, ¿cuál es el n	ombre de la persor	na en cuyo nombre prese	nta esta queja? Nombre:
8. ¿Cuál es su relación con es	ste individuo?			

9. Por favor explique por qué ha presentado la queja en nombre de u	ın tercero:			
10. Por favor, confirme que ha obtenido el permiso de la parte agraviada en el archivo en su nombre.	Si	No		
Sección III:				
11. Creo que la discriminación que he recibido fue basada en (marqu	ue todas las que correspor	ndan):		
[] Raza [] Color [] Origen nacio	onal			
12. Fecha de supuesta discriminación: (mm/dd/aaaa)				
13. Explique los mas claramente posible lo que ocurrió y por que ust Describa a todas las personas que hayan participado. Incluya el nom que usted considera que lo/la discrimino (si se conoce), así como no Si necesita mas espacio, por favor adjunte hojas adicionales.	bre e información de cont	acto de la(s) persona(s)		
0 1 11				
Seccion IV:	usida da Marra a Mallar O I	. 10: 1 1N-		
14. Ha presentado previamente una queka bajo el Titulo VI ante la C	uldad de Moreno Valley? [Si No		
Seccion V: 15. Ha presentado esta queja ante alguna otra agencia federal, estat		1.6.1		
[] Si [] No si la respuesta es si Marque todo lo que aplique [] Agencia Federal [] Agencia Estatal [] Federal Tribunal [] 16. Si respondió "si" a la pregunta 15, proporcione información sobre donde se presento la queja.				
Nombre/Titulo:				
Agencia: Direccion:				
Telefono/Correo electrónico:				
Seccion VI:				
Nombre de la agencia de transporte contrala que se presenta la que Persona de contacto: Telefono:	ia:			
Puede adjuntar cualquier material escrito u otra infor	mación que conside	ere relevante para su		
queja.	'	•		
Se requiere la firma y la fecha a continuación para co	ompletar el formular	io:		
Firma	Fecha			
Por favor entregue este formulario en persona o env	íelo por correo a la :	siguiente dirección:		
Moreno Valley City Hall, Title VI Coordinator 14177 Frederick Street Moreno Valley, CA 92553				



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

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

1. None		
2.		

Public Participation Plan

About the City of Moreno Valley

The City of Moreno Valley is a city in Riverside County, California, United States, and is part of the Riverside—San Bernardino—Ontario metropolitan area. It is the second-largest city in Riverside County by population and one of the Inland Empire's population centers. The city's population was 208,634 at the 2020 census. Moreno Valley is also part of the greater Los Angeles area.

Purposes of this Plan

Public participation is the process through which stakeholders can partake directly in agency decision-making, and express their concerns, desires, and values. It is the mission of this agency to "improve the lives of people with disabilities by creating opportunities to maximize their independence." At every opportunity through prescribed methods the agency will solicit input from stakeholders to best support persons served without creating disproportionately high and adverse human health or environmental effects on minority and/or low-income populations.

Summary of Outreach Efforts

The following is a summary of outreach efforts conducted by the City of Moreno Valley as they relate to Title VI requirements under the Public Participation Plan. Many of our activities are

conducted in partnership or ad hoc outreach with other service organizations and non-profit agencies within the community. This is in no way a complete list but rather documents the agency's outreach efforts as they relate specifically to minority and low-income populations.

- Physical Marketing Materials
- Online Marketing Materials
- Parks & Community Services' Soaring Guide Printed three times a year
- Senior Town Hall Meetings Occur every other month
- Senior Citizen's Commission Meetings Once a month

The agency also maintains an Outreach Manager that meets on a quarterly basis and sets annual marketing and outreach goals. The Outreach Manager conducts various comprehensive outreach activities throughout the year including public and website engagements, three yearly activity guides, social media campaigns, open houses and press releases. Additionally, on an annual basis the agency develops a comprehensive Strategic Marketing Plan that includes Public Relations, Employee and Consumer Relations, and Program Development.

Language Assistance Plan

Overview

The first section in this document describes the purpose of the Language Assistance Plan (LAP). The second section in this document provides the four-factor Limited English Proficient (LEP) analysis (as outlined by the Department of Transportation (DOT) used to identify LEP needs and assistance measures. The four-factor LEP analysis includes:

- Factor 1: The number or proportion of LEP persons in the service area who may be served or are likely to encounter the MoVal Wellness-on-Wheels (WoW) Program.
- Factor 2: The frequency with which LEP persons encounter the MoVal Wellness-on-Wheels (WoW) Program.
- **Factor 3:** The nature and importance of programs, activities or services provided MoVal Wellness-on-Wheels (WoW) Program to the LEP population.
- **Factor 4:** The resources available to the City of Moreno Valley and overall cost to provide LEP assistance.

The third and final section discusses the implementation of the Language Assistance Plan, which includes methodologies for identifying LEP individuals, providing services, establishing policies, monitoring the LAP, and recommendations for future LAP implementations.

Purpose of the Language Assistance Plan

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

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

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

The United States Department of Transportation (DOT) published guidance that directed its recipients to ensure meaningful access to the benefits, services, information, and other

important portions of their programs and activities for LEP customers. The City of Moreno Valley's language assistance plan (LAP) includes a four-factor analysis and implementation plan that complies with the requirements of DOT LEP guidance.

Four Factor Analysis

<u>Factor 1:</u> The number or proportion of LEP persons eligible to be served or likely to be encountered by City of Moreno Valley.

The City of Moreno Valley holds a unique position about meeting the Title VI requirements. As a sub-recipient of FTA 5310 Grant funding, the agency's focus is primarily to transport seniors and adults with disabilities where current public transit options are insufficient or do not exist. Eligible program participants or "riders" must be referred into the as such, the City of Moreno Valley does not offer transportation to the general public other than in situations involving a coordinated plan with other entities. Therefore, an analysis of public demographic data, Moreno Valley does not represent actual populations served by this program but is offered for comparison purposes only.

The source of data for the Four Factor Analysis comes from the 2023 American Community Survey (ACS) 5 Year Estimates. This Plan is updated every three years, with the most ACS data available.

American Community Survey

The City of Moreno Valley has a population of 197,052 as of the ACS 2023 5 Year Estimates. 43% of the population speaks Spanish. Of the Spanish-speaking population, 28% speak English "very well" and 15% speak English less than "very well." Two percentage (2%) of the City of Moreno Valley speak Tagalog.

	Moreno Valley, California	Percentage of Population
Total:	197,052	100%
Speak only English	100,628	51%
Spanish:	85,419	43%
Speak English "very well"	55,493	28%
Speak English less than "very well"	29,926	15%
Other Indo-European languages:	2,022	1%
Speak English "very well"	1,112	1%
Speak English less than "very well"	910	0%
Tagalog (incl. Filipino):	2,963	2%
Speak English "very well"	1,969	1%
Speak English less than "very well"	994	1%

Factor 2: The frequency with which LEP persons encounter the program.

The program has not begun, however the current program participants attending and participating in senior programming and are predominately Spanish speaking is approximately 20%. If you include those participants that are more comfortable speaking Spanish, the percentage is 40%. Based on those percentages, it is likely the program will encounter approximately 25% Spanish speaking participants.

<u>Factor 3:</u> The nature and importance of the program, activity, or service provided by the program to people's lives.

The primary purpose of the WoW program is to provide transportation for seniors for wellness related activities to promote physical, social and emotional well-being. The WoW program can enhance the quality of life for seniors and adults with disabilities.

<u>Factor 4:</u> The resources available to the recipient for LEP outreach, as well as the costs associated with that outreach.

The City of Moreno Valley operating budget does not have a specific line item for providing language access and outreach. Outreach expenses as they relate to LEP populations are split among several departments depending on which department is responsible for the outreach. Costs for translation of documents are minimal and have not been quantified.

The budget for WoW, which provides services through the FTA 5310 grant, is a small fraction of the agency's budget. The total annual expenditure for outreach activities is less than \$1,000. This includes advertising in the City's Souring Guide, social media spotlights, and printed

program flyers. Specific outreach to LEP populations has not been conducted as a reasonably significant number of LEP persons have not been served by this program, as indicated in Factor 1.

SUMMARY

The results of the Four Factor Analysis can be summarized with the following points:

As the City of Moreno Valley prepares to launch this new service, the Four-Factor Analysis serves as a preliminary evaluation to identify potential Limited English Proficient (LEP) populations and guide future language assistance planning. While actual ridership data is not yet available, the analysis above is informed by demographic projections and current participation in other city programs.

Language Assistance Implementation Plan

Methodologies

Identifying LEP Individuals

As evidenced by the Four Factor Analysis, the predominant minority language in the region is Spanish. The consumers that are primarily served by the WoW program have disabilities that affect language proficiency rather than language barrier alone.

Providing Services

While the agency does not currently have an on-going need for professional translation services, documents that are offered in Spanish include:

- Title VI Notice to the Public
- Title VI Complaint Form
- Title VI Complaint Procedures
- Agency website Title VI information

Other documents can be translated to Spanish orally as appropriate.

Communicating Availability of Language Assistance

Individuals who register for the WoW program and need language assistance, there are bilingual Spanish speaking staff available to assist with registering. Program information will be available to residents in Spanish.

Monitoring

Participants in the program will be periodically asked to complete satisfaction surveys to provide feedback on current wellness activities and to suggest additional activities that may better meet their needs. Surveys will be made available in both English and Spanish to ensure accessibility for all participants.

In addition, the Title VI Plan will be reviewed and updated at least once every three years to ensure continued compliance and responsiveness to community needs.

Employee Training

The City of Moreno Valley employees are trained on the translation services available to the community to ensure effective communication with individuals with limited English proficiency (LEP). Community members in need of translation assistance may submit a request, and the city will provide a qualified translator within 72 hours of the request.

Additionally, the city employs bilingual staff who receive bilingual pay and are available to assist residents requiring immediate translation services. This ensures timely and accessible communication for all community members.

Safe Harbor Provision

The Federal Transit Authority Circular 4702.1B states:

"DOT has adopted DOJ's Safe Harbor Provision, which outlines circumstances that can provide a "safe harbor" for recipients regarding translation of written materials for LEP populations. The Safe Harbor Provision

that, if a recipient provides written translation of vital documents for each eligible LEP language group that constitutes five percent (5%) or 1,000 persons, whichever is less, of the total population of persons eligible to be served or likely to be affected or encountered, then such action will be considered strong evidence of compliance with the recipient's written translation obligations. Translation of non-vital documents, if needed, can be provided orally. If there are fewer than 50 persons in a language group that reaches the five percent (5%) trigger, the recipient is not required to translate vital written materials but should provide written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost.

These safe harbor provisions apply to the translation of written documents only. They do not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language services are needed and are reasonable. A recipient may determine, based on the Four Factor Analysis, that even though a language group meets the threshold specified by the Safe Harbor Provision, written translation may not be an effective means to provide language assistance measures. For example, a recipient may

determine that a large number of persons in that language group have low literacy skills in their native language and therefore require oral interpretation. In such cases, background documentation regarding the determination shall be provided to FTA in the Title VI Program."

Membership of Non-Elected Committees and Councils

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

Title VI Equity Analysis

The City of Moreno Valley does not have transit-related facilities.

City Council Approval of City of Moreno Valley Title VI Program

A RESOLUTION OF THE City of Moreno Valley BOARD OF DIRECTORS AUTHORIZING THE TITLE VI COMPLIANCE PLAN FOR THE AGENCY.

WHEREAS, City of Moreno Valley desires 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 Requirement and Guidelines for Federal Transit Administration Recipients,"

WHEREAS, the Board of Directors wishes to authorize approval of the compliance plan developed by staff to comply with the necessary provisions of the Civil Rights Act,

NOW, THEREFORE BE IT RESOLVED, by the City Council of City of Moreno Valley as follows:

- 1. The City Manager is authorized to implement the components of the plan in order to meet Federal requirements.
- 2. The City Manager is authorized to implement policies that may be necessary to comply with subsequent revisions or interpretations to the Civil Rights Act.

PASSED AND ADOPTED by the City Council of City of Moreno Valley, State of California, on this 2^{nd} day of September.

