



**paratransit**  
creating independence through smart transit **inc.**

# **TITLE VI TRIENNIAL PROGRAM 2011-2014**

**PARATRANSIT, INC  
P.O. BOX 231100  
Sacramento, CA 95823**

**This page is intentionally blank.**

# ***Table of Contents***

|  |  |           |
|--|--|-----------|
| <b>1.</b>  | <b>Overview .....</b>                                | <b>5</b>  |
| <b>2.</b>  | <b>Description of Transit Service .....</b>          | <b>5</b>  |
| <b>3.</b>  | <b>General Reporting Requirements .....</b>          | <b>7</b>  |
| <b>3.1</b>   | <b>Annual Title VI Assurance .....</b>               | <b>7</b>  |
| <b>3.2</b>   | <b>Title VI Complaint Procedures .....</b>           | <b>8</b>  |
| <b>3.3</b>   | <b>Record of Title VI Investigations .....</b>       | <b>8</b>  |
| <b>3.4</b>   | <b>Language Access .....</b>                         | <b>8</b>  |
| <b>3.5</b>   | <b>Notifying Beneficiaries of Protections .....</b>  | <b>12</b> |
| <b>3.6</b>   | <b>Required Submission of Title VI Program .....</b> | <b>12</b> |
| <b>3.7</b>   | <b>Environmental Justice Analysis .....</b>          | <b>13</b> |
| <b>3.8</b>   | <b>Inclusive Public Involvement .....</b>            | <b>13</b> |
| <br><b>Appendix 1: FY 2011 Certifications &amp; Assurances Executed by Paratransit, Inc.</b>   |  |           |
| <b>Appendix 2: Paratransit, Inc. Policy Statement on Non-Discrimination and Title VI Civil Rights Protections</b>                    |  |           |
| <b>Appendix 3: Paratransit, Inc. Implementation Procedure for Policy on Non-Discrimination and Title VI Civil Rights Protections</b> |  |           |
| <b>Appendix 4: Paratransit, Inc. Languages Spoken at Home by Ability to Speak English for Populations 5+ Years</b>                   |  |           |

**This page is intentionally blank.**



## 1. Overview

Founded in 1978, Paratransit, Inc., is a private nonprofit corporation dedicated to providing transportation services to individuals with disabilities, the elderly, and related agencies throughout the Sacramento County area.

Since 1981, Paratransit, Inc. has served as the Consolidated Transportation Services Agency (CTSA) for the Sacramento area and is recognized as a national leader in coordinated transportation programs.

In 1979, using Paratransit, Inc. as a model, Assemblyman Walter Ingalls authored Assembly Bill (AB) 120, the Social Service Transportation Improvement Act. This landmark legislation included a provision calling for the designation of a Consolidated Transportation Service Agency (CTSA) in each California county. Paratransit, Inc. was the first such agency designated in California.

Since 1981, Paratransit, Inc. has served the Sacramento area as its Consolidated Transportation Services Agency (CTSA). As the designated CTSA in Sacramento, Paratransit works with social service agencies, such as United Cerebral Palsy, Asian Community Center, and Elk Grove Adult Community Training, to increase transportation options for seniors, individuals with disabilities, and persons with low incomes.

On July 21, 2010, Paratransit Inc. was designated by the Stanislaus County Council of Governments as the designated CTSA for Stanislaus County. The first steps will be to establish the infrastructure necessary to develop and implement a coordinated mobility management and travel training services for the residents in Stanislaus County.

Paratransit, in its role as the leader in coordinated transportation efforts in the region, has designed and implemented a variety of programs to assist human services agencies in delivering cost-efficient, client-focused transportation. For over 30 years, Paratransit has worked with a variety of local non-profit agencies to provide transportation services, vehicle maintenance, and travel training programs.

## 2. Description of Transit Service

Paratransit Inc., in collaboration with the Sacramento Regional Transit District (SRTD), provides SRTD's required ADA complementary paratransit service in SRTD's service area. In addition, Paratransit, Inc. funds and provides demand response service to individuals for trips taken outside the minimum ADA boundary for Age- and ADA eligible riders. Due to a recent fiscal emergency declared by SRTD, the parties are engaged in a facilitated mediation process to iron out policy and funding differences resulting from the fiscal emergency, reductions in the ADA service boundary, and the recertification of individuals age 75 or older to determine their ADA eligibility status. Paratransit Inc. has assisted RT in the funding of ADA service, but also uses its revenues to provide non ADA



paratransit service to elderly and disabled passengers. Because of the significant reductions in funding, the following changes were implemented by Paratransit Inc. effective July 1, 2010:

Service Boundary: First, there are two boundaries: ADA and non ADA. An ADA trip is one provided to ADA registered individuals where the trip origin and trip destination both fall inside a ¾ mile boundary of an active RT fixed route or inside a ¾ mile circumference of an RT light rail station. Now that RT is closing most service at 9 p.m. daily, trips that used to be ADA will be redefined as non ADA. Paratransit's revenues are insufficient to pay for all of the non ADA demand shifted as a result of RT's service cuts and modification to its ADA Service Plan, so there will be denials for non ADA trips. Passengers are advised at the time of their calls whether their trips are ADA or non ADA.

Paratransit does not get any revenues to serve Elk Grove. Therefore, effective July 1, 2010, Paratransit Inc. no longer goes into Elk Grove except to complement the ADA trips in the RT Route 65 corridor when it is in operation. Paratransit does, however, take passengers to transfer points to catch Elk Grove's "eVan" service to their desired Elk Grove destination if they wish. Again, there will be denials for non ADA trips.

Eligibility: RT's July 2009 ADA Plan Update eliminated eligibility for ADA service irrespective of the Service Boundary for all persons certified solely on the basis of age. This means that, unless individuals certified as Age-eligible opt to become ADA certified, their trips will no longer be ADA trips. This affects over 4,600 passengers in Sacramento County; however, only about 1,300 are active riders. These individuals are encouraged to contact RT's Accessible Services Paratransit Certification Office to request an ADA application (916-557-4685 or TDD 916-557-4686).

Fare Structure: RT establishes the fare policy for ADA trips; Paratransit does so for non ADA trips. With the exception of service to the airport, which will cost \$50 one-way, during FY 2011 all other non ADA trips will remain at \$5 per one-way trip. A significant change to note is that the ADA monthly pass may not be used to pay for non ADA trips. Paratransit Inc. accepts either cash or coupons for all non ADA trips. Passengers are advised at the time of their calls whether their trips are ADA or non ADA.

Days and Hours of Service: While most of RT's fixed route service closes daily at 9 p.m., for FY 2011 Paratransit Inc. plans no changes in the days and hours of service for non ADA service. Paratransit Inc. service closes shortly after midnight every night and will be open on weekends and holidays as usual. Because all trips requested when RT is not operating are non ADA, service will be limited, and there will be denials. Passengers are advised at the time of their calls whether their trips are ADA or non ADA.

Ride Negotiations Process: There was no change in the ADA ride negotiations process. However, for non ADA trips Paratransit Inc. explores more fully with passengers how much flexibility they have regarding their desired pick-up times. This helps make it possible to provide more rides to customers—especially if



Paratransit can fill unused “slack” time in drivers’ schedules more effectively. It will also help make the routes more productive and cost effective.

Trip Purpose Priorities: There was no change in the ADA or non ADA service regarding trip purpose priorities. Paratransit Inc. did not impose a priority system for non ADA trips in FY2011. However, there will be denials for non ADA trips. Passengers are advised at the time of their calls whether their trips are ADA or non ADA.

Trip Restrictions: There is no change in the ADA or non ADA service regarding trip restrictions. Paratransit Inc. did not restrict the number of trips a person may request for non ADA service in FY 2011. However, there will be denials for non ADA trips. Passengers are advised at the time of their calls whether their trips are ADA or non ADA.

Mobility Options: Paratransit offers training on how to ride RT’s fixed route service at no cost to the individual. Training includes help planning how to get to and from favorite destinations and one-on-one training riding with passengers on the bus until they can navigate independently on their own. Because there will be non ADA denials, Paratransit Inc. encourages anyone who wants to learn how to ride the bus to take this free training. Companions are also eligible to receive training along with Paratransit passengers.

### 3. General Reporting Requirements

Chapter IV of FTA Circular 4702.1A speaks to the general reporting requirements required of recipients of FTA funding and its subrecipients to ensure that their activities comply with the DOT Title VI regulations and/or the DOT Order on Environmental Justice and the DOT Guidance on Limited English Proficiency (LEP). Reporting requirements covering nine general areas are identified in this chapter. Summaries of these requirements and Paratransit Inc.’s efforts in meeting them are outlined below.

#### 3.1 Annual Title VI Assurance

Applicants shall submit their annual Title VI assurance as part of their annual Certification and Assurance submission to FTA. Recipients shall collect Title VI assurances from subrecipients prior to passing through FTA funds (these Title VI assurances can be submitted as part of a standard list of assurances provided by subrecipients to their direct recipient).

Paratransit Inc. annually submits its Certifications and Assurances to the California Department of Transportation (Caltrans), Division of Mass Transportation, as a subrecipient of Section 5310 funds. The Executive Director and Chief Legal Counsel sign the annual Certifications and Assurances document and submit it with Paratransit Inc.’s Section 5310 applications to Caltrans. Paratransit Inc.’s latest signed copy of the Certifications and Assurances are included in this document as Appendix 1.

### 3.2 Title VI Complaint Procedures

In order to comply with 49 CFR §21.9(b), recipients and subrecipients shall develop procedures for investigating and tracking Title VI complaints filed against them and make their procedures for filing a complaint available to members of the public upon request.

Paratransit Inc. has developed procedures for filing, tracking, and investigating Title VI complaints. The procedures, including a complaint form provided by Paratransit Inc., are shown in Appendix 3.

### 3.3 Record of Title VI Investigations

In order to comply with 49 CFR §21.9(b), recipients and subrecipients shall prepare and maintain a list of any active investigations conducted by entities other than FTA, lawsuits, or complaints naming the recipient and/or subrecipient that allege discrimination on the basis of race, color, or national origin.

Paratransit Inc. has not received any complaints of discrimination pursuant to Title VI.

### 3.4 Language Access

Title VI and its implementing regulations require that FTA recipients take responsible steps to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are Limited English Proficient (LEP).

According to FTA Circular 4702.1A:

*“Certain FTA recipients or subrecipients, such as those serving very few LEP persons or those with very limited resources may choose not to develop a written LEP plan. However, the absence of a written LEP plan does not obviate the underlying obligation to ensure meaningful access by LEP persons to a recipient’s program or activities. Recipients or subrecipients electing not to prepare a written language implementation plan should consider other ways to reasonably provide meaningful access.”*

Due to its limited and diminishing resources, Paratransit Inc. has chosen not to develop a written LEP plan. However, as documented below, Paratransit Inc. currently implements a number of measures to ensure that limited-English speaking clients and customers have meaningful input into its services and projects. Therefore, Paratransit Inc. staff believes that it meets the standard for providing methods for meaningful input and access for limited-English speaking customers.



### Four Factor Analysis

The U. S. Department of Transportation (DOT) issued its *Policy Guidance Concerning Recipient's Responsibilities to Limited English Proficient (LEP) Persons* [Federal Register: December 14, 2005 (Volume 70, Number 239)]. This policy states that DOT recipients are required to take reasonable steps to ensure meaningful access to programs by LEP persons. This coverage extends to the recipient's entire program. There are four factors for agencies to consider when assessing language needs and determining what steps they should take to ensure access for LEP persons, regardless of whether or not the agency chooses not to prepare a written LEP plan:

- 1) The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity or service of the recipient;
  - 2) The frequency with which LEP individuals come in contact with the program;
  - 3) The nature and importance of the program, activity or service provided by the recipient to people's lives; and
  - 4) The resources available to the recipient and costs. A brief description of the self-assessment undertaken in each of these areas follows.
- The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity or service.

People of Spanish or Asian descent are the primary LEP persons likely to be encountered by Paratransit, Inc. programs and transit services. For the Sacramento Urbanized Area, the American Community Survey of the U.S. Census Bureau (2006-2008 Three Year Estimates) shows that among the area's population, 73.5 percent spoke English as a first language or "very well" as a second language. For groups who spoke English "less than very well," 6.1 percent are Hispanic, 1 percent is of Chinese decent, and 2.7 percent are of other Asian descent, including Russian, Hmong, Vietnamese, and Laotian.

Appendix 3 contains a table that lists the languages spoke at home by the ability to speak English for the population within the Sacramento urbanized area five years and older.

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

Paratransit, Inc. has assessed the frequency at which staff has or could possibly have contact with LEP persons. This includes

examining census data, phone inquiries, requests for translated documents, and staff feedback. As discussed above, census data indicate that there is a fairly large percentage of the general population who are Spanish-speaking persons or those of Asian descent. As a demand-response transportation provider, it is necessary to recognize these segments of the general population. Phone inquiries and staff feedback also indicate that Spanish-speaking and Asian language speaking LEP persons have regular contact with the service or program.

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

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

Although detailed data is not available from the American Community Survey, aggregate data indicates that, of those who take public transportation to work in the Sacramento urbanized area, 15.6 percent are of Hispanic or Latino origin, and 11.5 percent are of Asian descent. In addition, of those within the urbanized area who take public transportation to work, 10.8 percent speak English "less than very well." Although these figures are generalized to "public transportation" and are not segregated into fixed-route vs. demand-response services, it is reasonable to assume that these data would indicate that Paratransit's services are important to these populations as a primary means to get to work and other destinations.

➤ The resources available to the recipient and costs.

Paratransit, Inc. assessed their available resources that are currently being used, and those that could be used, to provide language assistance. Notwithstanding the significant cuts in funding for public transportation service in the Sacramento urbanized area, and the resulting cuts in ADA-related transportation services, Paratransit Inc. provides a reasonable degree of services for limited English speaking persons.

After analyzing the four factors outlined in U. S. DOT policy guidance, Paratransit, Inc. has determined that a limited-English proficiency plan is not required, as the agency already employs a number of measures to ensure that limited-English proficient individuals have meaningful input and access to Paratransit's services, including all of the following:



#### Interaction with the Limited-English Proficiency Persons

- Paratransit's automated telephone answering system provides information in both English and Spanish, and calls are routed as appropriate to English or Spanish speaking call representatives.
- Paratransit ensures that staff in the Call Center is available to work with customers who speak Spanish, Vietnamese, Russian, Hmong, and Chinese.
- Paratransit, Inc. works with organizations such as the Asian Community Center and the Hmong Heritage Center to recruit translators as needed for public presentations and mobility training sessions.
- When Paratransit Inc. staff makes community presentations to groups whom they know in advance are limited-English speakers, Paratransit staff will hire an interpreter to translate information from the presentation to meeting attendees.
- When customers communicate with Paratransit Inc. and state a language preference, requested materials are provided in the requested language.
- Notices that are posted on Paratransit vehicles are provided in English and Spanish, as drivers most frequently come into contact with Spanish-speaking individuals. Paratransit Inc. provides these notices to other limited-English speaking customers upon request.

#### LEP Training and Implementation by Paratransit Inc. Staff

- When new hires start employment, Paratransit Inc. management distributes an Administrative Handbook that contains all Paratransit, Inc. policies and procedures. The Administrative Handbook will be updated to include Paratransit's policy on outreach to and communication with limited-English speaking persons.
- As new policies/procedures are developed, or existing policies/procedures are amended, these new documents are distributed to affected employees through various methods, including but not limited to paper distribution, electronic documents, postings in employee break rooms, and scheduled group or individual training sessions.
- Vehicle operators, who are the most direct point of contact for LEP persons, have several methods to respond to an LEP individual. In many instances, LEP individuals are accompanied by a companion

who speaks English and can translate for the customer. In addition, many vehicle operators are bilingual. If vehicle operators are not bilingual, they are instructed to ask for assistance from a bilingual passenger. In the few cases where there is no one on the bus who can offer language assistance, the vehicle operator contacts dispatch, and a supervisor is sent to the bus to assist.

### 3.5 Notifying Beneficiaries of Protection

In order to comply with 49 CFR §21.9(d), recipients and subrecipients shall provide information to beneficiaries regarding their Title VI obligations and appraising beneficiaries of the protections against discrimination afforded to them by Title VI.

Paratransit Inc. has established a Policy Statement, per Title VI, for those who are benefiting from services and/or contracts funded with federal assistance and has made that Policy Statement available to the public. This Policy Statement addresses Paratransit's commitment to avoiding discrimination on the basis of race, color, or national origin. In addition, Paratransit Inc. has developed an Implementation Procedure and Complaint Process that provides the following additional information:

- A description of Title VI and the civil rights protections it affords
- Instructions on how to file a Title VI complaint
- A description of the process for handling complaints and notifying the complainant
- A description of who can file complaints and where to file them.

Paratransit's "*Policy Statement on Non-Discrimination and Title VI Civil Rights Protections*," which includes a public notification of rights, is shown in Appendix 2. All of these documents can be translated into various languages upon request. In addition, Paratransit's Title VI Policy Statement and Implementation Procedure are included on Paratransit's web site at [www.paratransit.org](http://www.paratransit.org).

### 3.6 Required Submission of Title IV Program

To ensure compliance with 49 CFR Section 21.9(b), FTA requires that all recipients document their compliance by submitting a Title VI Program to FTA's regional civil rights officer once every three years. In addition, entities applying for FTA funding for the first time shall provide information regarding their Title VI compliance history if they have previously received funding from another Federal agency. This shall include a copy of any Title VI compliance review activities conducted in the last three years.



As a subrecipient of federal funding through the Caltrans Division of Mass Transportation, Paratransit Inc. annually executes and submits Certifications and Assurances to Caltrans that contains the following certification by Paratransit Inc.:

*"Pursuant to 12 CFR, Part 21, Title VI of the Civil Rights Act of 1964, the subrecipient assures that no person, on the grounds of race, color, creed, national origin, sex, age, or disability shall be excluded from participating in, or denied the benefits of, or be subject to discrimination under any project, program, or activity (particularly in the level and quality of transportation services and transportation-related benefits) for which the subrecipient receives Federal assistance funded by the Federal Transit Administration (FTA)."*

The latest set of certifications and assurances executed by Paratransit Inc. is shown in Appendix 1.

This Title VI Program is the first required to be completed by Paratransit Inc. as a result of becoming eligible to receive FTA assistance allocated to the Sacramento urbanized area. Paratransit Inc. has not been subject to any Title VI compliance reviews by Caltrans or other agencies.

This new program will be updated every three years as required by FTA Circular 4702.1A. Any changes to Paratransit's Policy Statement and/or Implementation Process and Complaint Procedures will be reported, as will any complaints file against Paratransit Inc. for alleged discrimination under Title VI.

### 3.7 Environmental Justice Analysis

In order to integrate, into environmental analyses, considerations expressed in the DOT Order on Environmental Justice, recipients and subrecipients should integrate an environmental justice analysis into their National Environmental Policy Act (NEPA) documentation of construction projects.

At this time, Paratransit Inc. does not have any major construction projects that would require NEPA documentation. Should Paratransit Inc. engage in such a project in the future, Paratransit will ensure that both NEPA environmental analysis and Title VI environmental justice requirements are incorporated into the scope of work for the project.

### 3.8 Inclusive Public Involvement

In order to comply with 49 CFR 21.5(b)(7), and to engage in community outreach consistent with the DOT Order on Environmental Justice, recipients and subrecipients shall seek out and consider the viewpoints of minority and low-income populations in the course of conducting public outreach and involvement activities. An agency's public participation strategy shall offer early and continuous opportunities for the public to be

involved in the identification of social, economic, and environmental impacts of proposed transportation decisions.

Paratransit staff actively reaches out to organized community groups (i.e., Asian Community Center, Hmong Heritage Center, senior facilities, public transportation providers, etc.) to conduct travel training classes. During these classes, informational packets are disseminated, and Mobility Trainers provide instruction to anyone needing assistance on how to use both fixed-route and demand-response services.

Also, Paratransit Inc. staff participates in several advisory committees, including the Transit Coordinating Committee of the Sacramento Area Council of Governments, and the Mobility Advisory Council of the Sacramento Regional Transit District. Through these advisory councils, Paratransit staff participates in public outreach efforts on community and regional transportation and transit service planning efforts.

## **Appendix 1**

### **FY 2011 Certifications and Assurances Executed by Paratransit Inc.**

**This page is intentionally blank.**



## General Certifications and Assurances

The original of the "General Certifications and Assurances" should be signed and dated in blue ink. Use the legal name of your agency exactly as it appears on your Status Inquiry form. If you are a public entity, attach an authorizing resolution, designating a person authorized to sign on behalf of the agency, as an Appendix to the application.

|   |                                   |                                 |
|---|-----------------------------------|---------------------------------|
| Name of Applicant:<br><b>Paratransit, Inc.</b>            |                                   |                                 |
| Address:<br><b>2501 Florin Road, Sacramento, CA 95822</b> |                                   |                                 |
| Contact Person:<br><b>Mary Steinert</b>                   | Work Phone<br><b>916-868-6216</b> | Work Fax<br><b>916-868-6238</b> |

- a. Pursuant to 49 CFR, Part 21, Title VI of the Civil Rights Act of 1964: The subrecipient assures that no person, on the grounds of race, color, creed, national origin, sex, age, or disability shall be excluded from participating in, or denied the benefits of, or be subject to discrimination under any project, program, or activity (particularly in the level and quality of transportation services and transportation-related benefits) for which the subrecipient receives Federal assistance funded by the Federal Transit Administration (FTA).
- b. Pursuant to 49 CFR, Part 21, Title VI of the Civil Rights Act of 1964: The subrecipient assures that it shall not discriminate against any employee or subrecipient for employment because of race, color, creed, national origin, sex, age or disability and that it shall take affirmative action to ensure that subrecipient are employed, and that employees are treated during employment, without regard to their race, color, creed, national origin, sex, or age.
- c. Pursuant to 49 CFR Part 27, "Nondiscrimination on the Basis of Handicap in Programs and Activities Receiving or Benefiting from Federal Financial Assistance" and the Americans with Disabilities Act of 1990, as amended, at 49 CFR Parts 27, 37, & 38: The subrecipient certifies that it will conduct any program or operate any facility that receives or benefits from Federal financial assistance administered by FTA in compliance with all applicable requirements.
- d. Pursuant to FTA Circular 9045.1 - "New Freedom Program Guidance and Application Instructions" (dated May 1, 2007) and FTA Circular 9050.1 - "The Job Access and Reverse Commute (JARC) Program Guidance and Application Instructions" (dated May 1, 2007): The subrecipient assures that it will comply with the Federal statutes, regulations, executive orders, and administrative requirements, which relate to applications made to and grants received from FTA. The subrecipient acknowledges receipt and awareness of the provided reference list of statutes, regulations, executive orders, and administrative requirements.
- e. Pursuant to FTA Circular 4220.1F, "Third Party Contracting Guidance" (dated November 1, 2008): The subrecipient certifies that its procurements and procurement system will comply with all applicable requirements imposed by Federal laws, executive orders, or regulations and the requirements of FTA Circular 4220.1F, "Third Party Contracting Requirements," and such other implementing requirements as FTA may issue. The subrecipient certifies that it will include in its contracts, financed in whole or in part with FTA assistance, all clauses required by Federal laws, executive orders, or regulations and will ensure that each sub recipient and each contractor will also include in its sub agreements and contracts financed in whole or in part with FTA assistance all applicable contract clauses required by Federal laws, executive orders, or regulations.
- f. The subrecipient certifies that it will comply with the requirements of 49 CFR parts 663, in the course of purchasing revenue rolling stock. Among other things, the recipient will conduct, or cause to be conducted, the prescribed **pre-award and post-delivery reviews** and will maintain on file the certifications required by 49 CFR part 663, subparts B, C, and D.
- g. Pursuant to Government Code 41 U.S.C.701 et seq., and 49 CFR, Part 32, The subrecipient certifies that it has established and implemented an **anti-drug and alcohol misuse prevention program** and has conducted employee training complying with the requirements of 49 CFR part 655, "Prevention of Alcohol Misuse and Prohibited Drug Use in Transit Operations".
- h. The subrecipient assures and certifies that it requires its subcontractors and sub-recipients to have established and implemented an **anti-drug and alcohol misuse prevention program**, to have conducted employee training complying with the requirements of 49 CFR part 655, "Prevention of Alcohol Misuse and Prohibited Drug Use in Transit Operations".
- i. The subrecipient agrees and assures that it will comply with U.S. DOT regulations, "**Participation by Disadvantaged Enterprises in Department of Transportation Financial Assistance Programs,**" 49 CFR part



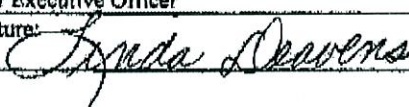
26. Among other provisions, this regulation requires recipients of DOT Federal financial assistance, namely State and local transportation agencies, to establish goals for the participation of disadvantaged entrepreneurs and certify the eligibility of DBE firms to participate in their DOT-assisted contracts. The recipient agrees and assures that it will comply with 49 CFR 26.49 which requires each transit vehicle manufacturer, as a condition of being authorized to bid or propose a FTA-assisted transit vehicle procurement (new vehicles only), certify that it complied with the requirements of the DBE program.
- j. The subrecipient assures and certifies that it will adhere to the **California State DBE Program Plan** as it applies to local agencies. The subrecipient must complete and submit to the Department a DBE Implementation Agreement. The subrecipient certifies that it must report twice annually on DBE participation in their contracting opportunities; their award/commitments and actual payments.
  - k. The subrecipient assures and certifies that **private for-profit transit operators** have been afforded a fair and timely opportunity to participate to the maximum extent feasible in the planning and provision of the proposed transportation services.
  - l. The subrecipient assures and certifies that the project complies with the **environmental impact** and related procedures of 23 CFR Part 771.
  - m. The subrecipient certifies that before expending any Federal assistance to acquire the first bus of any new **bus model or any bus model with a new major change in configuration or components** or before authorizing final acceptance of that bus (as described in 49 CFR part 665), that model of bus will have been tested at a bus testing facility approved by FTA and subrecipient and FTA will have received a copy of the test report prepared on that bus model.
  - n. The subrecipient assures and certifies that when procuring capital equipment acquired with Federal assistance it will comply with all **Buy America provisions, 49 CFR Part 661 and 49 USC 5323(j)(2)(c)**. This policy means that certain steel, iron, and manufactured products used in any capital equipment acquired with Federal assistance must be produced in the United States. Buy America requirements apply to all purchases, including materials and supplies funded as operating costs, if the purchase exceeds the threshold for small purchases (currently \$100,000).
  - o. The subrecipient certifies that it will comply with the **"FTA Annual List of Certifications and Assurances for Federal Transit Administration Grants and Cooperative Agreements"** and Appendix A Certifications and Assurances Checklist and Signature Page due March 31 of each year.
  - p. The subrecipient has provided documentation needed by the Department to assure FTA that it has properly and sufficiently delegated and executed authority, by Resolution, to the appropriate individual(s) to take official action on its behalf.
  - q. The subrecipient, providing **complementary paratransit service**, certifies that they have submitted to the Department an initial plan for compliance with the complementary paratransit service provision by January 26, 1992, as required by 49 CFR Part 37, Section 135[b] and have provided the Department annual updates to its plan on January 26 of each year, as required by 49 CFR Part 37, Section 139[c]. The subrecipient has provided the Department an initial plan signed and dated \_\_\_\_\_.
  - r. The subrecipient certifies that all **direct and indirect costs** billed are allowable per Title 2 Code of Federal Regulations, Part 225 (2 CFR 225) (formerly Office of Management and Budget (OMB) Circular A-87), the federal guidelines for allowable costs for subrecipients that are State, Local and Indian Tribal governments or 2 Code of Federal Regulations, Part 230 (2 CFR 230), (formerly, OMB Circular A-122) if the subrecipient is a non-profit organization. With regards to private for-profit organizations **48 CFR Part 3**.
  - s. The subrecipient certifies that all indirect costs billed are supported by an annual **indirect cost allocation plan** submitted in accordance with 2 CFR 225. The plan or subrecipients' cognizant agency approval of plan was submitted to the Department's Audits and Investigations and approved before subrecipient submits request for reimbursement of any indirect costs. Indirect costs prior to having a plan approved as evidenced by a letter from the Department's Audits and Investigations is not an allowable expense. If subrecipient does not bill for indirect cost then an indirect cost allocation plan is not required.
  - t. The subrecipient certifies that they understand that **Transit Employee Protection** is specified in Title 49 U.S.C. 5333(b). This Title requires that the interests of employees affected by assistance under most FTA programs shall be protected under arrangements the Secretary of Labor concludes are fair and equitable. Title 49 U.S.C. 5311(b) requires that the Department of Labor (DOL) use "a special warranty that provides a fair and equitable arrangements to protect the interests of employees" in order for the 5311(i) requirements to apply to Section 5311.
  - u. The subrecipient certifies that the recipient shall comply with 49 CFR Part 604 in the provision of any **charter service** provided with FTA funded equipment and facilities. The subrecipient certifies that in the provision of any charter service provided, subrecipient and its recipients will provide charter service that uses equipment or facilities acquired with Federal assistance authorized for 49 U.S.C. 5307, 5311, 5316 or 5317, only to the extent that there are



acquired with Federal assistance authorized for 49 U.S.C. 5307, 5311, 5316 or 5317, only to the extent that there are no private charter service operators willing and able to provide those charter services that it or its recipients desire to provide unless one or more of the exceptions in 49 CFR part 604-Subpart B applies. The subrecipient assures and certifies that the revenues generated by its incidental charter bus operations (if any) are, and shall remain, equal to or greater than the cost (including depreciation on federally assisted equipment) of providing the service. The subrecipient understands that the requirements of 49 CFR part 604 will apply to any charter service provided, the definitions in 49 CFR part 604 apply to this agreement, and any violation of this agreement may require corrective measures and the imposition of penalties, including debarment from the receipt of further Federal assistance for transportation.

- v. Pursuant to 49 CFR, Part 26, the subrecipient must prepare and maintain complaint procedures for investigating and tracking Title VI complaints filed against them. Such procedures include record of investigations, complaints, and/or lawsuits, and notice to public about rights containing instructions on how to file a discrimination complaint. Recipients of federal financial assistance are required to take reasonable steps to ensure meaningful access to their programs and activities by limited English proficient persons.
- w. As required by 49 U.S.C. 5323 (f) and FTA regulations, "School Bus Operations," at 49 CFR 605.14, the subrecipient agrees that it and all its recipients will: (1) engage in school transportation operations in competition with private school transportation operators only to the extent permitted by an exception provided by 49 U.S.C. 4323 (f) and implementing regulations, and (2) comply with requirements of 49 CFR part 605 before providing any school transportation using equipment or facilities acquired with Federal assistance awarded by FTA and authorized by 49 U.S.C. Chapter 53 or Title 23 U.S.C. for transportation projects. The subrecipient understands that the requirements of 49 CFR part 605 will apply to any school transportation it provides, that the definitions of 49 CFR part 605 apply to any school transportation agreement, and a violation of this agreement may require corrective measures and the imposition of penalties, including debarment from the receipt of further Federal assistance for transportation.
- x. To the best of my knowledge and belief, the data in this application are true and correct, and I am authorized to sign these assurances and to file this application on behalf of the subrecipient.

**Certifying Representative**

|   |                |
|---|----------------|
| Name (print):<br>Linda Deavens  |                |
| Title (print):<br>Chief Executive Officer   |                |
| Signature:<br> | Date<br>8/6/10 |

**This page is intentionally blank.**



## ***Appendix 2***

### ***Paratransit, Inc. Policy Statement on Non- Discrimination and Title VI Civil Rights Protections***

**This page is intentionally blank.**

## **Paratransit, Inc.**

### **Policy Statement on Non-Discrimination**

**Paratransit Inc. treats its customers with respect, integrity, and loyalty.**

The Board of Directors of Paratransit, Inc., takes this opportunity to express one of its highest priorities in the area of operating federally-funded programs (i.e., employment and training, community services, etc.). This priority is assuring that administration of Paratransit, Inc., and federally-funded programs administered by Paratransit, Inc., operate with the common goal of providing equal opportunity to federally-funded staff and participants.

Paratransit, Inc. operates its programs without regard to race, color, creed, national origin, religion, sex, sexual preference, marital status, age, medical condition, or disability in accordance with Title VI of the Civil Rights Act, California Civil Code section 51(b), or other applicable law. For more information, contact Paratransit, Inc.'s Administrative Office at (916) 429-2009 or email [paratransit@paratransit.org](mailto:paratransit@paratransit.org).

Paratransit, Inc., will take positive measures toward eliminating architectural barriers, artificial barriers and achieving equal opportunity through its continued implementation of its Affirmative Action Program.

Paratransit, Inc., will also take positive measures to accomplish its objectives of the program and to ensure that no person is discriminated against because of sex, age, race, creed, color, handicap, religion, national origin, political affiliation or belief, or heritage.

The Board of Directors specifically prohibits any form of sexual harassment within Paratransit, Inc, or any federally-funded program. Any federally-funded staff member, participant, or applicant to a federally funded program who feels he or she has been discriminated against, should contact Paratransit, Inc.'s, Equal Employment Opportunity Officer/ADA Coordinator by telephone at 429-2009 (TDD 429-2568; FAX 429-2409) or in writing at P.O. Box 231100, Sacramento, California, 95823-0401.

### **Policy Statement on Title VI Civil Rights Protections**

*The Civil Rights Act of 1964, Title VI, states 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 subjected to discrimination under any program or activity receiving Federal financial assistance."*

Paratransit, Inc. is committed to complying with the requirements of Title VI in all of its federally funded programs and activities.



## **Filing a Title VI Complaint**

Persons who believe they have been aggrieved by an unlawful discriminatory practice under Title VI may file a complaint with Paratransit, Inc. For information on filing a complaint, contact Paratransit, Inc.'s Administrative Office. Complaints must be in writing and must be filed within 180 days following the date of the alleged discriminatory occurrence.

Email: [paratransit@paratransit.org](mailto:paratransit@paratransit.org)

Phone: (916) 429-2009

Fax: (916) 429-2409

Mail: Paratransit, Inc.

Attention: Civil Rights Coordinator

P.O. Box 231100

Sacramento, CA 95823

**This page is intentionally blank.**

## ***Appendix 3***

***Paratransit, Inc.***

***Implementation Procedure for  
Policy on Nondiscrimination and  
Title VI Civil Rights Protection***

**This page is intentionally blank.**



**Paratransit, Inc.**  
**Implementation Procedure for Policy on Nondiscrimination**  
**and Title VI Civil Rights Protection**

Page | 1

## **1.0 Policy**

The Board of Directors of Paratransit, Inc., takes this opportunity to express one of its highest priorities in the area of operating federally-funded programs (i.e., employment and training, community services, etc.). This priority is assuring that administration of Paratransit, Inc., and federally-funded programs administered by Paratransit, Inc., operate with the common goal of providing equal opportunity to federally-funded staff and participants.

Paratransit, Inc., will take positive measures toward eliminating architectural barriers and achieving equal opportunity through its continued implementation of its Affirmative Action Program. Paratransit, Inc., will also take positive measures to accomplish its objectives of the program and to ensure that no person is discriminated against because of sex, age, race, creed, color, handicap, religion, national origin, sexual orientation, political affiliation or belief, or heritage, per the Civil Rights Act of 1964 (as outlined in Title VI of the Act). The Board of Directors also specifically prohibits any form of sexual harassment within Paratransit, Inc., or any federally-funded program.

## **2.0 Applicability**

This policy applies to any staff member of, participant in, or applicant to any federally-funded program operated or administered by Paratransit, Inc.

**2.1** The Paratransit, Inc., Civil Rights Coordinator is designated to coordinate and investigate allegations of noncompliance with the Policy on Nondiscrimination and Title VI Civil Rights Protections.

**2.2** Information regarding this policy may be obtained from the Civil Rights Coordinator via telephone: Voice: (916) 429-2009 Ext. 302; TDD: 429-2568; FAX: 429-2409.

**Paratransit, Inc.**  
**Implementation Procedure for Policy on Nondiscrimination**  
**and Title VI Civil Rights Protection**

Page | 2

**3.0 Grievance Procedure**

**3.1** Allegations of noncompliance with this policy shall be signed by the applicable person and mailed to the address below within 180 days of the date of the alleged discrimination. The written allegation must contain the following information:

- Your name, address, and how to contact you (i.e. phone number, email address, etc)
- How, when, where, and why you believe you were discriminated against. Include the location, names, and contact information of any witnesses.

This information should provide sufficient detail to help the designated investigator find a prompt and equitable resolution, and, if applicable, the specific remedy sought by the grievant.

The complaint may be filed through several methods:

In writing: Paratransit, Inc.  
Civil Rights Coordinator  
P.O. Box 231100  
Sacramento, California 95823-0401

Download and Complete a Printable Form: Online at [www.paratransit.org](http://www.paratransit.org) as a PDF document.

Email: [paratransit@paratransit.org](mailto:paratransit@paratransit.org)  
By Phone: (916) 429-2009  
By Fax: (916) 429-2409  
By TTD: (916) 429-2568

Complaint Assistance: Paratransit staff will assist in writing a complaint if the complainant is unable to do so.

Complainants may also file a Title VI 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 and an external entity simultaneously, the external complaint will supersede the City's complaint



**Paratransit, Inc.**  
**Implementation Procedure for Policy on Nondiscrimination**  
**and Title VI Civil Rights Protection**

Page | 3

and the City's complaint procedures will be suspended pending the external entity's findings.

The complainant also will be advised of his/her right to appeal the response to federal and state authorities as appropriate. The City 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.

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

U.S. Department of Transportation  
Federal Transit Administration  
Office of Civil Rights, Region IX  
201 Mission Street, Suite 1650  
San Francisco, California 94105-1839.

**3.2** The following definitions control the timelines of this grievance procedure:

**3.2.1** The day of receipt by Paratransit, Inc., of the allegation shall be the File Date of the allegation.

**3.2.2** A business day is a day when the Paratransit, Inc., administrative office is open, which is between 8:00 a.m. and 5:00 p.m. Monday through Friday, excluding holidays.

**3.3** If the allegation details are sufficient, the allegation shall be immediately investigated and a response shall be mailed to the grievant within thirty (30) business days after the File Date.

**3.4** If the allegation details are insufficient, the grievant shall be notified in writing within fifteen (15) business days after the File Date of the specific additional information needed to make it complete.

**3.4.1** If the grievant fails to provide the additional needed information within thirty (30) business days after the File Date, the grievance shall be closed.

**Paratransit, Inc.**  
**Implementation Procedure for Policy on Nondiscrimination**  
**and Title VI Civil Rights Protection**

Page | 4

**3.4.2** If the grievant provides the additional information needed to complete the allegation, it shall be immediately investigated and a response shall be mailed to the grievant no later than sixty (60) business days after the File Date.

**3.5** All written responses to allegations of discrimination shall undergo review by Paratransit, Inc., legal staff before being mailed to any grievant. Disciplinary actions administered to employees of Paratransit, Inc., resulting from this grievance procedure will not be divulged.

**4.0 Notice**

The Paratransit, Inc., Policy on Nondiscrimination and Title VI Civil Rights Protections shall be published in the Paratransit, Inc., ***Policies Related to Individual Users of Paratransit's Service*** as it may be amended from time to time. The Collective Bargaining Agreement Between Paratransit, Inc., and the Drivers' union contain a similar nondiscrimination policy applicable to both parties. This implementation procedure shall be provided upon request, in accessible formats as necessary, to applicable persons and other interested persons.

Attachment: Title VI Complaint Form

**Paratransit, Inc.  
Implementation Procedure for Policy on Nondiscrimination  
and Title VI Civil Rights Protection**

Page | 5

**Paratransit, Inc.  
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:

Paratransit, Inc.  
P.O. Box 231100  
Sacramento, CA 95823

ATTN: Civil Rights Coordinator

Or fax the form to (916) 429-2409. TTD customers can contact Paratransit, Inc. at (916) 429-2568.

1. Complainant's Name: \_\_\_\_\_

2. Address: \_\_\_\_\_

3. City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

4. Telephone Number (home): \_\_\_\_\_ (business): \_\_\_\_\_

5. Person discriminated against (if someone other than the complainant): \_\_\_\_\_

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

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

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

6. 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: \_\_\_\_\_

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



**Paratransit, Inc.**  
**Implementation Procedure for Policy on Nondiscrimination**  
**and Title VI Civil Rights Protection**

Page | 6

8. 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.

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

If yes, check each box that applies:

Federal agency: \_\_\_\_\_

Federal court: \_\_\_\_\_

State agency: \_\_\_\_\_

State court: \_\_\_\_\_

Local agency: \_\_\_\_\_

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

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

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

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

Telephone Number: \_\_\_\_\_

11. Please sign below. You may attach any written materials or other information that you think is relevant to your complaint.

\_\_\_\_\_  
Complainant's Signature

\_\_\_\_\_  
Date

If you have any questions or need assistance filling out this form, please contact the Civil Rights Coordinator at (916) 429-2009 or send an email message to [paratransit@paratransit.org](mailto:paratransit@paratransit.org).

## ***Appendix 4***

### ***Paratransit Inc. Languages Spoken at Home by Ability to Speak English for Population 5+ Years***

**This page is intentionally blank.**



**Appendix 4**  
**Paratransit Inc.**

**Languages Spoken at Home by Ability to Speak English for Population 5+ Years**

|                                     | Estimate  | Percentage of Total<br>Population > 5 Years Old |
|-------------------------------------|-----------|---|
| Total:                              | 1,383,714 |   |
| Speak only English                  | 1,016,401 |   |
| Spanish or Spanish Creole:          | 165,627   |   |
| Speak English "very well"           | 80,961    |   |
| Speak English less than "very well" | 84,666    | 6.12%   |
| French (incl. Patois, Cajun):       | 4,168     |   |
| Speak English "very well"           | 3,283     |   |
| Speak English less than "very well" | 885       | 0.06%   |
| French Creole:                      | 32        |   |
| Speak English "very well"           | 0         |   |
| Speak English less than "very well" | 32        | 0.00%   |
| Italian:                            | 2,277     |   |
| Speak English "very well"           | 1,745     |   |
| Speak English less than "very well" | 532       | 0.04%   |
| Portuguese or Portuguese Creole:    | 1,431     |   |
| Speak English "very well"           | 1,058     |   |
| Speak English less than "very well" | 373       | 0.03%   |
| German:                             | 4,681     |   |
| Speak English "very well"           | 4,025     |   |
| Speak English less than "very well" | 656       | 0.05%   |
| Yiddish:                            | 102       |   |
| Speak English "very well"           | 102       |   |
| Speak English less than "very well" | 0         | 0.00%   |
| Other West Germanic languages:      | 868       |   |
| Speak English "very well"           | 719       |   |
| Speak English less than "very well" | 149       | 0.01%   |
| Scandinavian languages:             | 556       |   |
| Speak English "very well"           | 522       |   |
| Speak English less than "very well" | 34        | 0.00%   |
| Greek:                              | 1,035     |   |
| Speak English "very well"           | 749       |   |
| Speak English less than "very well" | 286       | 0.02%   |
| Russian:                            | 19,869    |   |
| Speak English "very well"           | 8,697     |   |
| Speak English less than "very well" | 11,172    | 0.81%   |
| Polish:                             | 769       |   |
| Speak English "very well"           | 656       |   |
| Speak English less than "very well" | 113       | 0.01%   |
| Serbo-Croatian:                     | 1,466     |   |
| Speak English "very well"           | 1,074     |   |
| Speak English less than "very well" | 392       | 0.03%   |



**Appendix 4**  
**Paratransit Inc.**

**Languages Spoken at Home by Ability to Speak English for Population 5+ Years**

|                                     | Estimate | Percentage of Total<br>Population > 5 Years Old |
|-------------------------------------|----------|---|
| Other Slavic languages:             | 12,578   |   |
| Speak English "very well"           | 4,881    |   |
| Speak English less than "very well" | 7,697    | 0.56%   |
| Armenian:                           | 1,320    |   |
| Speak English "very well"           | 572      |   |
| Speak English less than "very well" | 748      | 0.05%   |
| Persian:                            | 6,377    |   |
| Speak English "very well"           | 3,998    |   |
| Speak English less than "very well" | 2,379    | 0.17%   |
| Gujarathi:                          | 1,346    |   |
| Speak English "very well"           | 1,011    |   |
| Speak English less than "very well" | 335      | 0.02%   |
| Hindi:                              | 9,576    |   |
| Speak English "very well"           | 6,458    |   |
| Speak English less than "very well" | 3,118    | 0.23%   |
| Urdu:                               | 1,420    |   |
| Speak English "very well"           | 685      |   |
| Speak English less than "very well" | 735      | 0.05%   |
| Other Indic languages:              | 10,289   |   |
| Speak English "very well"           | 5,756    |   |
| Speak English less than "very well" | 4,533    | 0.33%   |
| Other Indo-European languages:      | 5,353    |   |
| Speak English "very well"           | 2,683    |   |
| Speak English less than "very well" | 2,670    | 0.19%   |
| Chinese:                            | 24,705   |   |
| Speak English "very well"           | 10,250   |   |
| Speak English less than "very well" | 14,455   | 1.04%   |
| Japanese:                           | 4,328    |   |
| Speak English "very well"           | 2,491    |   |
| Speak English less than "very well" | 1,837    | 0.13%   |
| Korean:                             | 5,156    |   |
| Speak English "very well"           | 2,111    |   |
| Speak English less than "very well" | 3,045    | 0.22%   |
| Mon-Khmer, Cambodian:               | 1,849    |   |
| Speak English "very well"           | 1,275    |   |
| Speak English less than "very well" | 574      | 0.04%   |
| Hmong:                              | 17,768   |   |
| Speak English "very well"           | 8,114    |   |
| Speak English less than "very well" | 9,654    | 0.70%   |
| Thai:                               | 1,889    |   |
| Speak English "very well"           | 837      |   |
| Speak English less than "very well" | 1,052    | 0.08%   |



**Appendix 4**  
**Paratransit Inc.**

**Languages Spoken at Home by Ability to Speak English for Population 5+ Years**

|  | Estimate | Percentage of Total<br>Population > 5 Years Old |
|--|----------|---|
| Laotian:                               | 3,079    |   |
| Speak English "very well"              | 1,444    |   |
| Speak English less than "very well"    | 1,635    | 0.12%   |
| Vietnamese:                            | 14,363   |   |
| Speak English "very well"              | 5,490    |   |
| Speak English less than "very well"    | 8,873    | 0.64%   |
| Other Asian languages:                 | 8,740    |   |
| Speak English "very well"              | 4,646    |   |
| Speak English less than "very well"    | 4,094    | 0.30%   |
| Tagalog:                               | 20,108   |   |
| Speak English "very well"              | 13,357   |   |
| Speak English less than "very well"    | 6,751    | 0.49%   |
| Other Pacific Island languages:        | 5,195    |   |
| Speak English "very well"              | 3,843    |   |
| Speak English less than "very well"    | 1,352    | 0.10%   |
| Navajo:                                | 33       |   |
| Speak English "very well"              | 33       |   |
| Speak English less than "very well"    | 0        | 0.00%   |
| Other Native North American languages: | 251      |   |
| Speak English "very well"              | 233      |   |
| Speak English less than "very well"    | 18       | 0.00%   |
| Hungarian:                             | 479      |   |
| Speak English "very well"              | 296      |   |
| Speak English less than "very well"    | 183      | 0.01%   |
| Arabic:                                | 3,662    |   |
| Speak English "very well"              | 3,000    |   |
| Speak English less than "very well"    | 662      | 0.05%   |
| Hebrew:                                | 369      |   |
| Speak English "very well"              | 203      |   |
| Speak English less than "very well"    | 166      | 0.01%   |
| African languages:                     | 3,851    |   |
| Speak English "very well"              | 3,076    |   |
| Speak English less than "very well"    | 775      | 0.06%   |
| Other and unspecified languages:       | 348      |   |
| Speak English "very well"              | 184      |   |
| Speak English less than "very well"    | 164      | 0.01%   |

Source: U.S. Census Bureau, 2006-2008 American Community Survey

**This page is intentionally blank.**