**Title VI Program Update Approach**

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| **Title VI Program Section** | **Update Needed** | **Responsibility** |
| Title VI Notice to the Public | 1. Review Notice for correct contact information for Title VI Administrator, Title VI complaints, and language assistance. 2. Update as needed. |  |
| List of Locations Where Title VI Notice Is Posted | 1. Review list for correct locations and any new locations. 2. Update as needed |  |
| Title VI Complaint Procedures | 1. Review for accuracy 2. Discuss with Title VI administrator any complaints received, if any updates to the complaint procedures are advisable. 3. Update as needed. |  |
| Title VI Complaint Form | 1. Review for accuracy regarding contact information. 2. Update as needed. |  |
| List of Transit-Related Title VI Investigations, Complaints, and Lawsuits | 1. Update as needed following discussion with the Title VI Administrator. |  |
| Public Participation Plan | 1. Update Demographics Section 2. Review Outreach Requirements and Activities with Title VI Administrator and appropriate staff. 3. Update as needed |  |
| Summary of Outreach Efforts Made Since 2009 Title VI Submission | Update Summary to include outreach since 2012. |  |
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| 1. Introduction | Update as needed |  |
| 2. Results of Four Factor Analysis | Update appropriately |  |
| Factor 1 | Revise demographics based on recent census data and EL data; Language Line usage information. |  |
| Factor 2 | Update based on new staff survey results |  |
| Factor 3 | Update as needed |  |
| Factor 4 | Update as needed |  |
| 3. Implementation Plan |  |  |
| Responsibility for Implementation | Update as needed |  |
| Language Service Provision | Update as needed based on changing demographics, staff survey, and discussions with Title VI Administrator |  |
| Outreach/Notice of Availability of Language Assistance | Update as needed based on changing demographics, staff survey, and discussions with Title VI Administrator |  |
| 4. Monitoring, Evaluating, and Updating the LAP | Update as needed |  |
| 5. Staff Training | Update as needed |  |
| Table Depicting the Membership of Non-Elected Committees and Councils | Update as needed |  |
| Description of Subrecipient Monitoring and Schedule of Subrecipient Title VI Program Submissions | Update as needed |  |
| Title VI Equity Analysis | Update, as appropriate |  |
| Board of Directors Approval of Needles’s Title VI Program | Present updated Program to Board on\_\_\_\_. |  |
| Additional Information for Transit Providers that operate 50 or more fixed route vehicles in peak service and are located in an Urbanized Area (UZA) of 200,000: System-Wide Policies and Service Standards | Review Standards and Policies with Title VI Administrator for any concerns, issues, changes to fleet or service area. |  |
| Effective Practices to Fulfill the Service Standard Requirement | 1. Revise as needed 2. Update Service Availability Standards based on updated census data |  |
| Effective Practices to Fulfill the Service Policy Requirement | Revise as needed |  |