

Title VI Program UPDATE APPROACH

Title VI Program Section	Update Needed	Responsibility
Title VI Notice to the Public	<ol style="list-style-type: none"> Review Notice for correct contact information for Title VI Administrator, Title VI complaints, and language assistance. Update as needed. 	
List of Locations Where Title VI Notice Is Posted	<ol style="list-style-type: none"> Review list for correct locations and any new locations. Update as needed 	
Title VI Complaint Procedures	<ol style="list-style-type: none"> Review for accuracy Discuss with Title VI administrator any complaints received, if any updates to the complaint procedures are advisable. Update as needed. 	
Title VI Complaint Form	<ol style="list-style-type: none"> Review for accuracy regarding contact information. Update as needed. 	
List of Transit-Related Title VI Investigations, Complaints, and Lawsuits	<ol style="list-style-type: none"> Update as needed following discussion with the Title VI Administrator. 	
Public Participation Plan	<ol style="list-style-type: none"> Update Demographics Section Review Outreach Requirements and Activities with Title VI Administrator and appropriate staff. Update as needed 	
Summary of Outreach Efforts Made Since Last Title VI Submission	Update outreach summary	
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	

Title VI Program UPDATE APPROACH

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	<ol style="list-style-type: none"> 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	

Title VI QUICK REFERENCE SHEET

When to think about Title VI

Row	Activity/ Event	Title VI Implications	Resources
A	Public Outreach	<p>- Translation in Spanish (and/or other applicable languages)</p> <ul style="list-style-type: none"> • Posters and other promotional materials • If applicable or requested, survey, presentation or handouts <p>- Interpretation in Spanish (and/or other applicable languages), as appropriate</p>	<ul style="list-style-type: none"> • “AGENCY” Title VI Public Participation Plan, page __ • “AGENCY” Title VI Language Assistance Plan, page __ • FTA C. 4702 .1B, Chapter III-5-6
B	Construction / Determining a New Location	<p>Must conduct a Title VI Equity Analysis</p> <p>Key Notes:</p> <ul style="list-style-type: none"> • Purpose- to ensure location is selected without regard to race, color, or national origin. • Must be conducted DURING planning, i.e. BEFORE construction, purchase of site, etc. • Multiple alternatives must be considered • If site is found to create a disproportionate burden or disparate impacts, there are mitigations that can be considered. 	<ul style="list-style-type: none"> • “AGENCY” Title VI program, page__ • FTA C. 4702 .1B, Chapter III-11-12 • FTA Office of Civil Rights, (202) 366-4018
C	Fare or Fare Media Change	<ul style="list-style-type: none"> • Conduct Public Outreach DURING planning process consistent with Public Participation Plan- see Row A • Must conduct a Title VI Equity Analysis IF conditions in Row C Exists 	<ul style="list-style-type: none"> • Title VI Program page__ • “AGENCY” Title VI Public Participation Plan, page _ • “AGENCY” Title VI Language Assistance Plan, Page__ • FTA C. 4702 .1B, Chapter VI, pages IV-10—IV-21 • FTA Office of Civil Rights, (202) 366-4018
D	Major Service Change	<ul style="list-style-type: none"> • Must conduct a Title VI Equity Analysis IF conditions in Row C Exists • Undertake public outreach DURING planning process 	<ul style="list-style-type: none"> • FTA C. 4702 .1B, Chapter VI, pages IV-10—IV-21 • FTA Office of Civil Rights, (202) 366-4018

Title VI QUICK REFERENCE SHEET

When to think about Title VI

Row	Activity/ Event	Title VI Implications	Resources
D, Cont.		consistent with Public Participation Plan- see Row A	<ul style="list-style-type: none"> • “AGENCY” Title VI Public Participation Plan • “AGENCY” Title VI Language Assistance Plan
E	<p>AGENCY GROWTH: operate 50 or more Fixed-route vehicles in peak service hour AND POPULATION GROWTH: Agency is located in a UZA of 200,000 or more in population</p>	<p>- Must collect and report data:</p> <ul style="list-style-type: none"> • Demographic and service profile maps and charts • Survey data of customer demographic and travel patterns <p>- Monitor transit service</p>	<ul style="list-style-type: none"> • FTA C. 4702 .1B, Chapter VI, pages IV-7—IV-9 • FTA Office of Civil Rights, (202) 366-4018 • FTA C. 4702 .1B, Chapter VI, pages IV-9—IV-10

Title VI IMPLEMENTATION GUIDANCE

Sample To-Do List

To-do	Timeframe for Completion	Responsibility
Print Title VI Program and ensure and other materials are available at reception	Immediately	
Ensure Language Line information and instructions are available for all staff (office and operators that communicate with the members of the public)		
Place "I speak" flashcards at reception; on buses and available at public events		
Update all posted Title VI Notices to reflect current information.	Near-term	
Determine best alternative for website translation		
Translate Rider Brochures and Guides		
Develop staff training program and materials and implement		
Submit Title VI Program to appropriate board (Caltrans or FTA)		