

Embracing Your Title VI Program

Updating and Implementing your
Title VI Program for Transit Providers



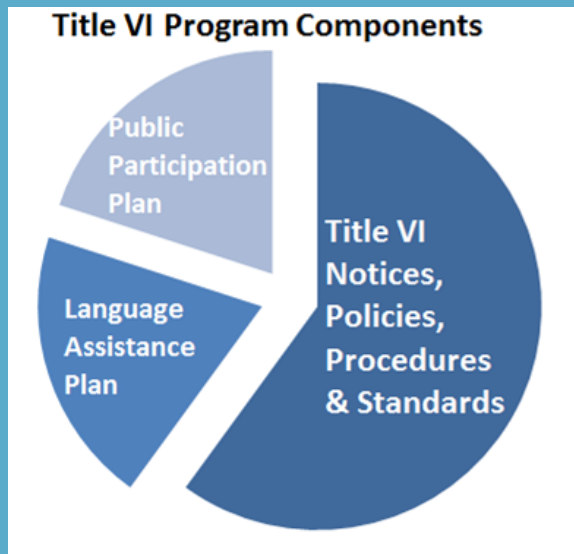
What Are We Talking About Today?

- Title VI Purposes and Authorization
- Updating Your Title VI Program
- Title VI Triggers
- Implementation Guidance
- Q&A



*Carrots and Sticks of
your Title VI Program!*

Title VI Authorization and Purposes



U.S. Department
of Transportation

Federal Transit
Administration

CIRCULAR

FTA C 4702.1B

October 1, 2012

Subject: TITLE VI REQUIREMENTS AND GUIDELINES FOR FEDERAL TRANSIT ADMINISTRATION RECIPIENTS

1. **PURPOSE.** The purpose of this Circular is to provide recipients of Federal Transit Administration (FTA) financial assistance with guidance and instructions necessary to carry out U.S. Department of Transportation ("DOT" or "the Department") Title VI regulations (49 CFR part 21) and to integrate into their programs and activities considerations expressed in the Department's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient ("LEP") Persons (70 FR 74087, December 14, 2005).
2. **CANCELLATION.** This Circular supersedes FTA Circular 4702.1A "Title VI and Title VI-Dependent Guidelines for Federal Transit Administration Recipients," dated May 13, 2007.
3. **AUTHORITY.**
 - a. Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d et seq.

Title VI vs. Environmental Justice

Title VI of the Civil Rights Act of 1964 - FTA C. 4702.1B

- Prohibits discrimination on the basis of **race, color or national origin**
- Broad in scope:
 - All activities
 - Requires remediation

Environmental Justice Executive Order - EO 12898

- Mission focused
- Identifying and addressing disproportionately high and adverse health and environmental impacts of policies, programs and activities on **low-income and minority populations**
- Narrow in Scope
 - Is Executive Branch policy
 - Not enforceable in courts
 - Does not create any rights or remediations

Title VI Protections

FTA Circular 4702.1B

DISPARATE IMPACT:

“facially neutral policy” or practice that disproportionately affects members of a group identified by race, color, or national origin.



Are we unfairly distributing transit resources throughout the community?

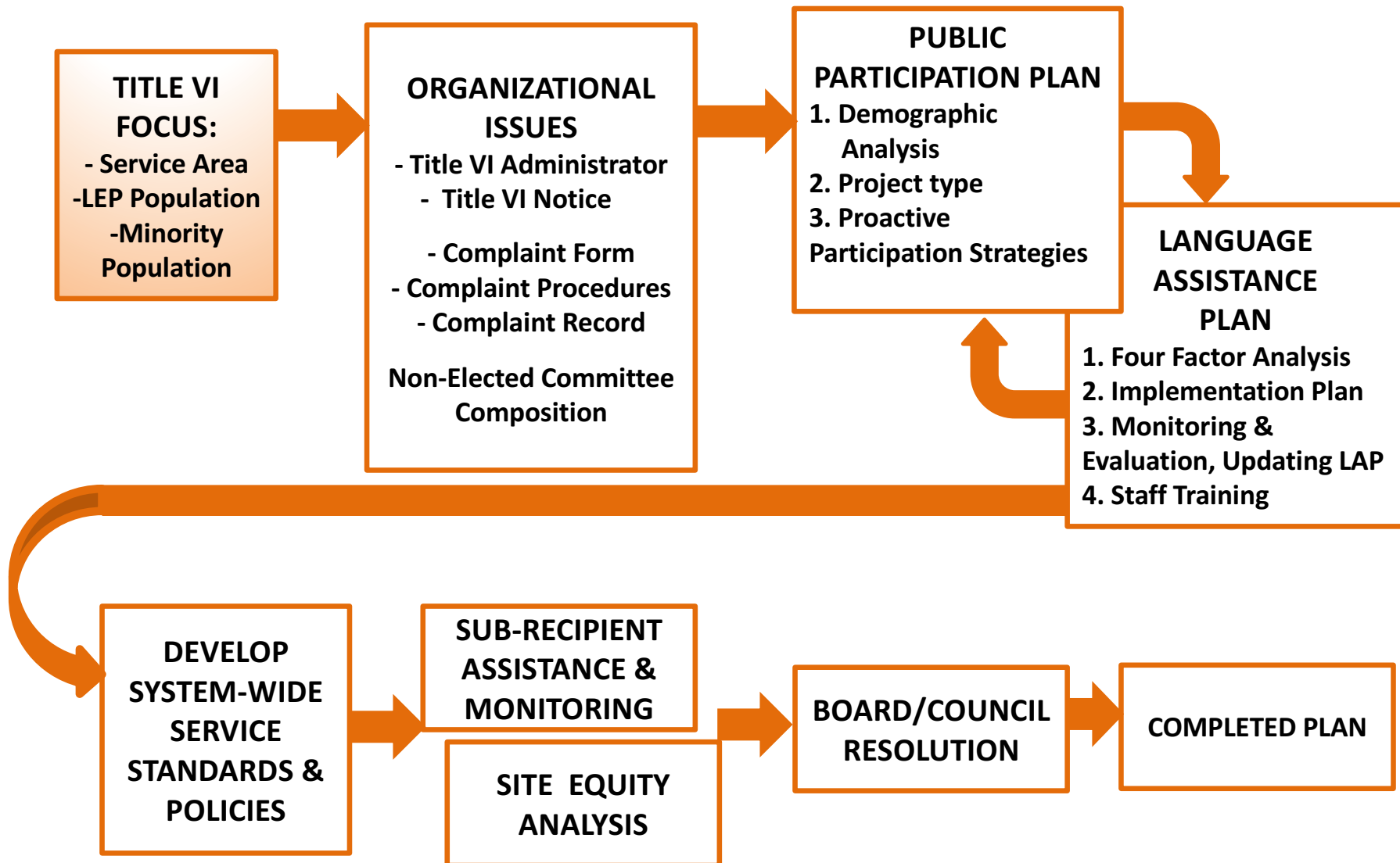
DISPROPORTIONATE BURDEN:

A neutral policy or practice that disproportionately affects low-income/minority populations more than other populations.

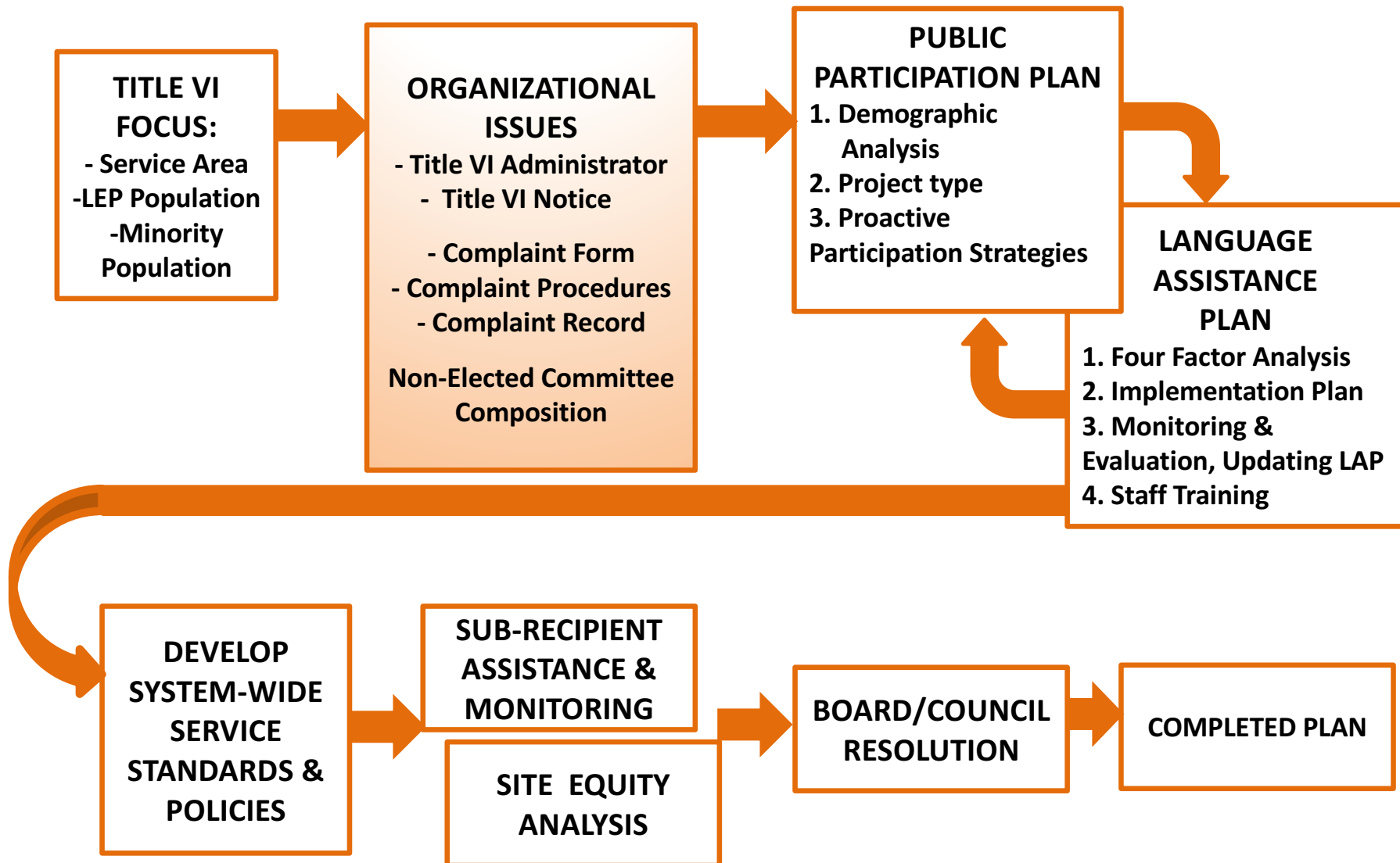


Are we unfairly burdening a minority/low-income community over others?

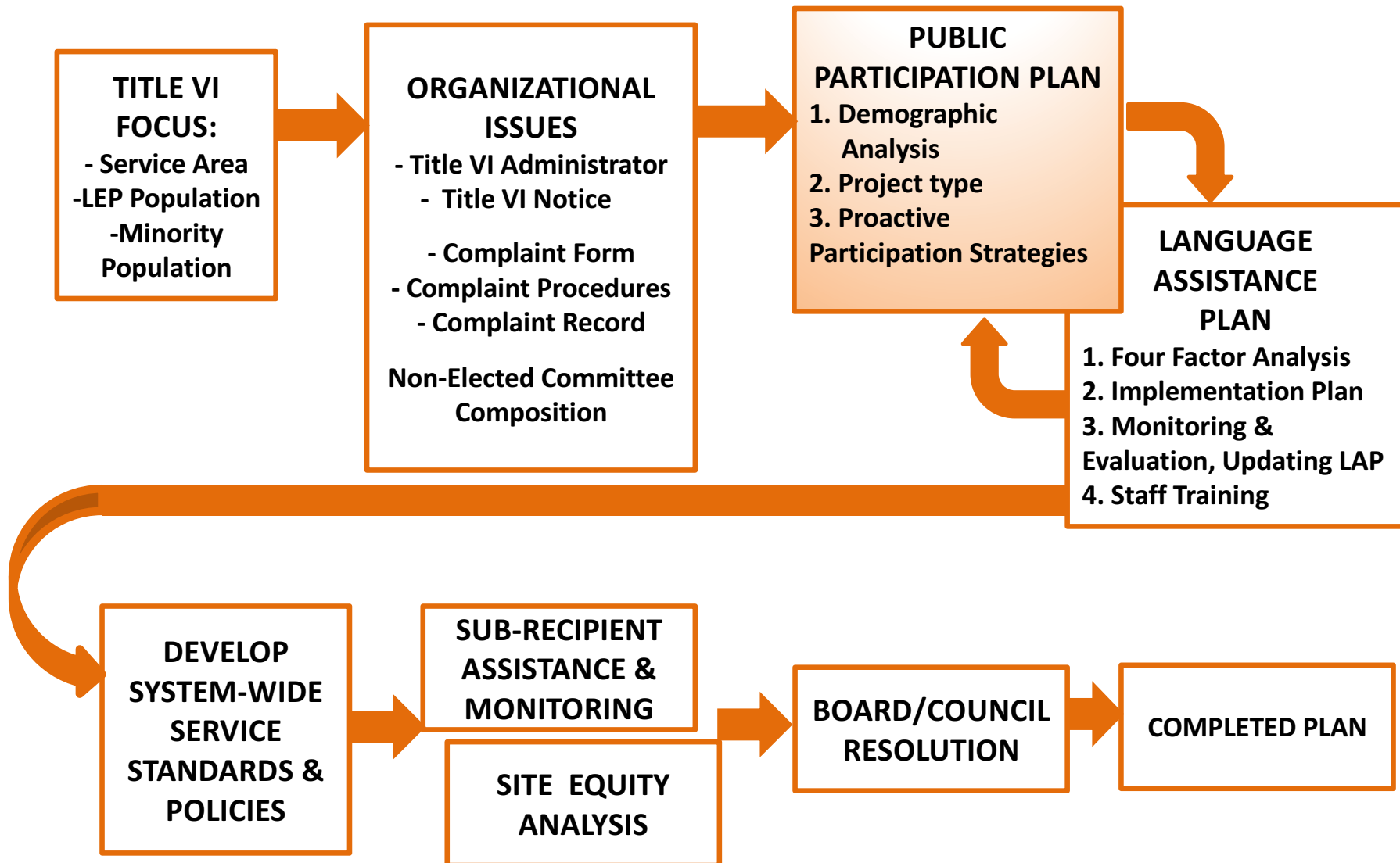
Title VI Program Components



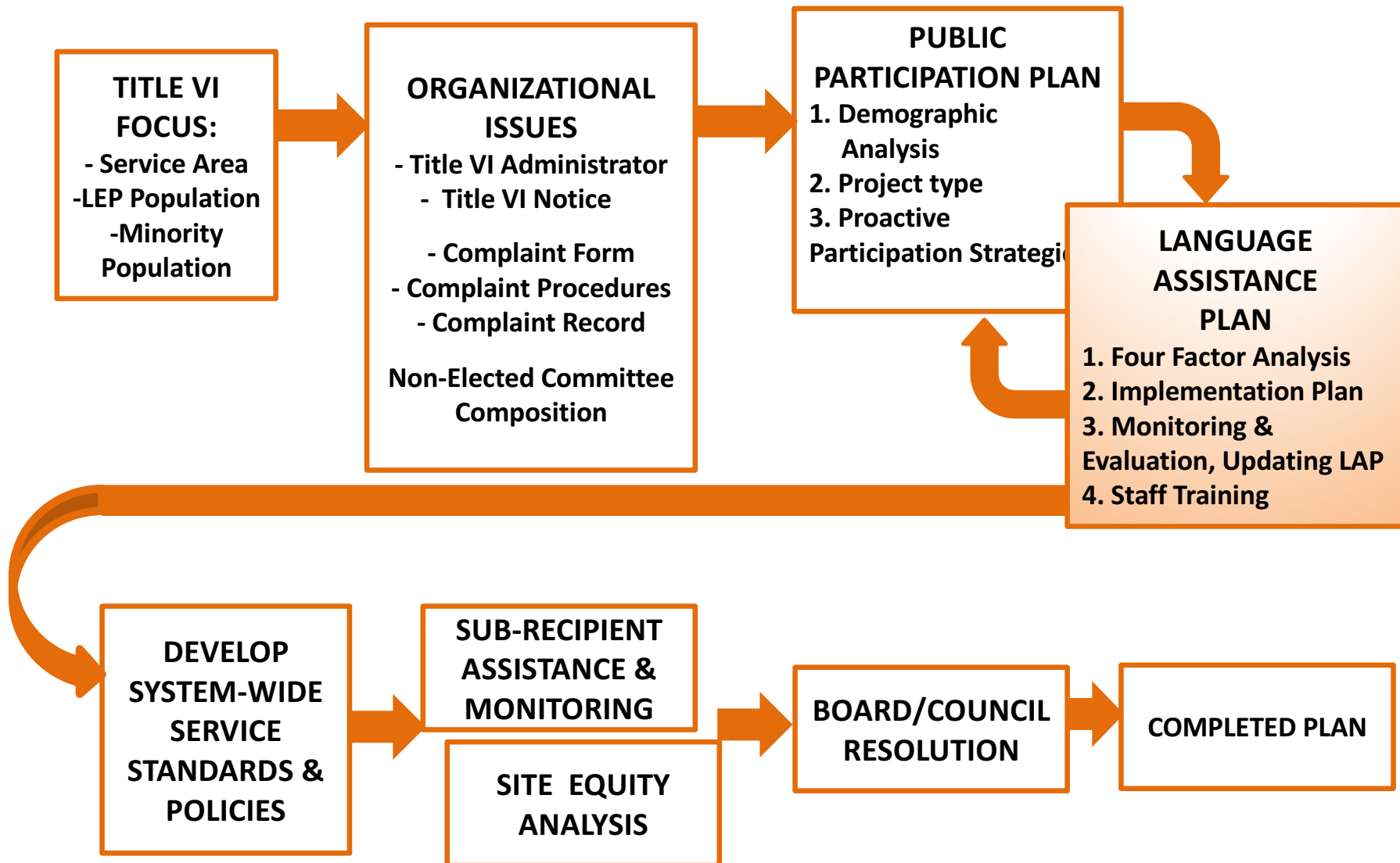
Title VI Program Components



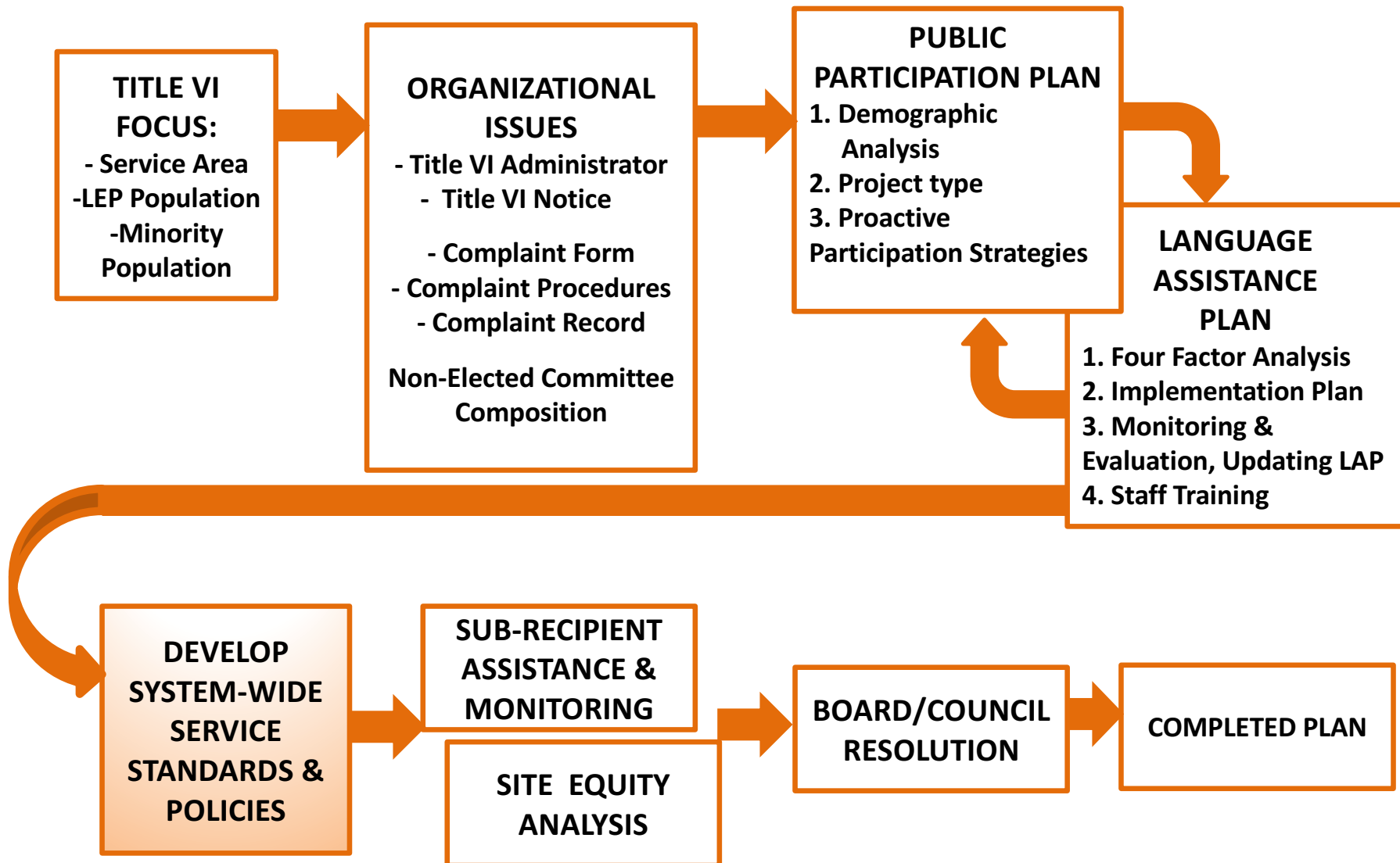
Title VI Program Components



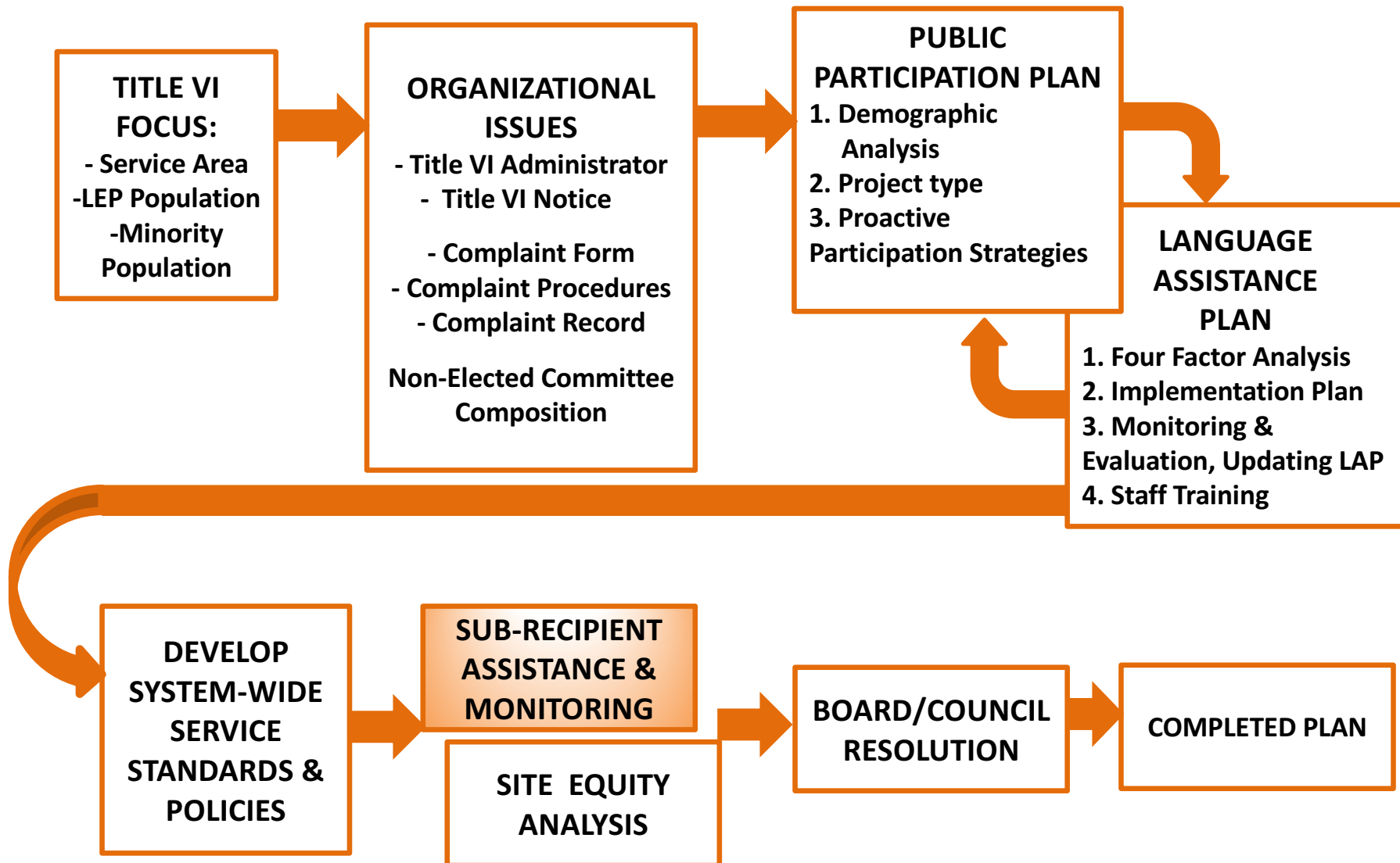
Title VI Program Components



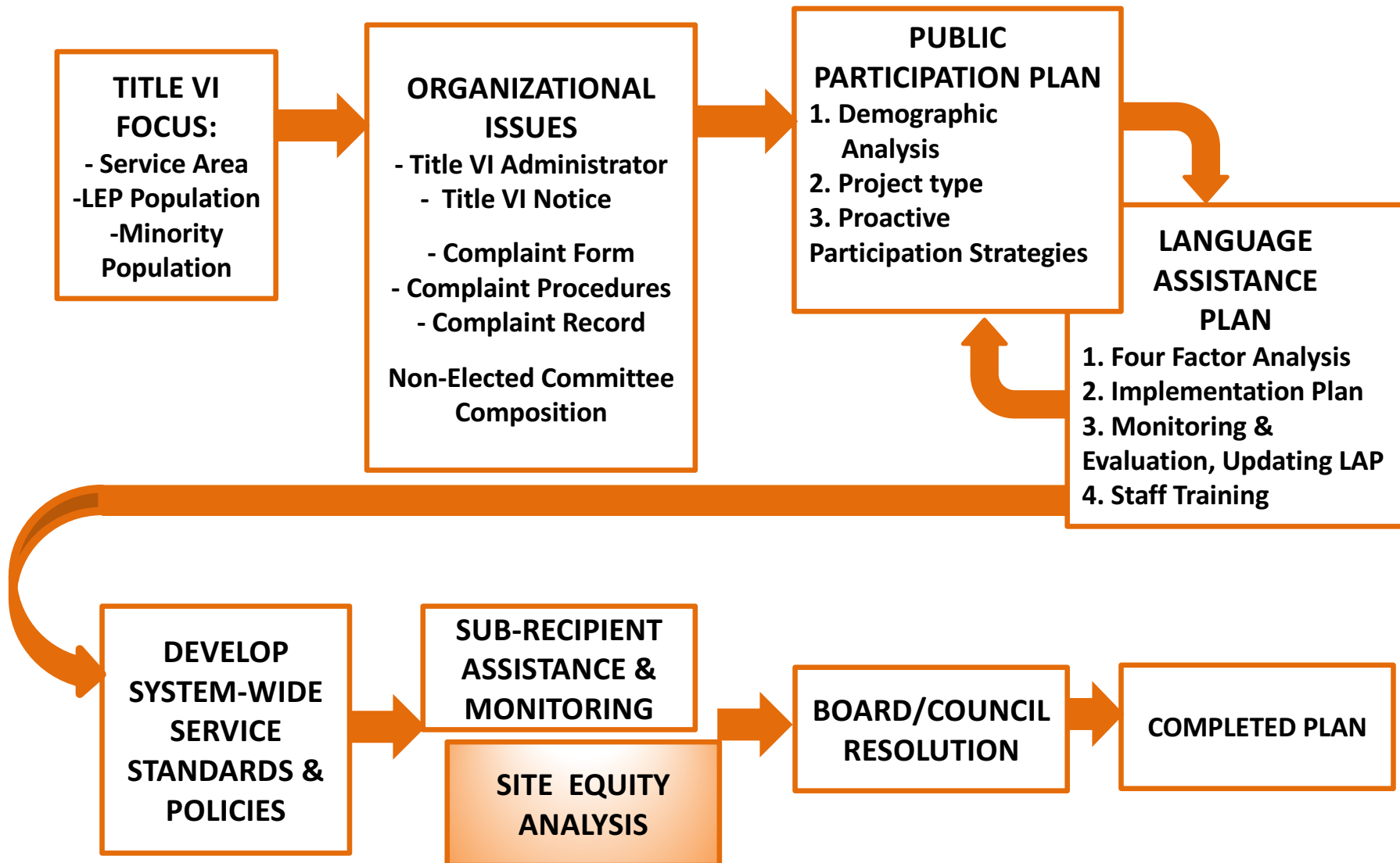
Title VI Program Components



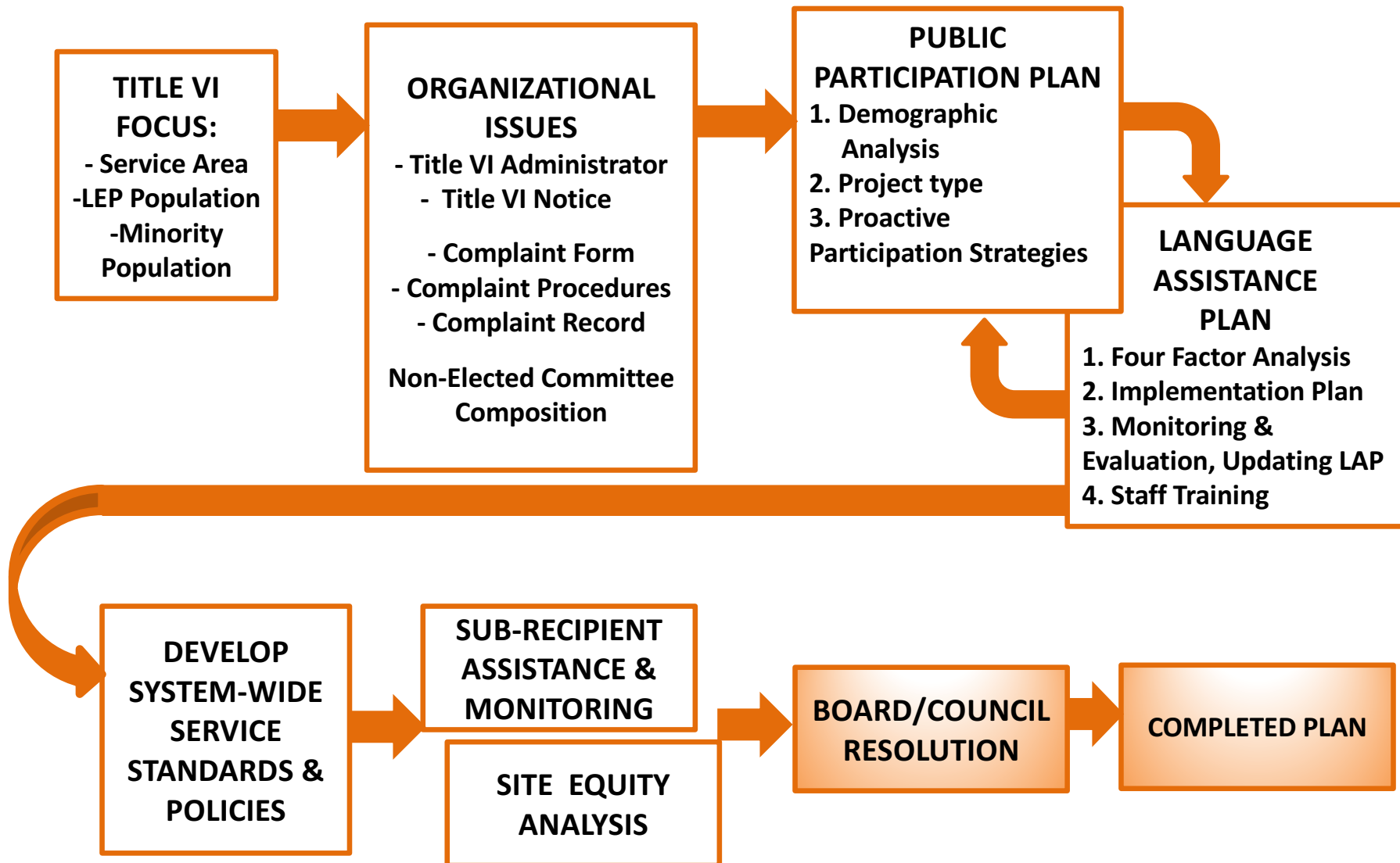
Title VI Program Components



Title VI Program Components



Title VI Program Components

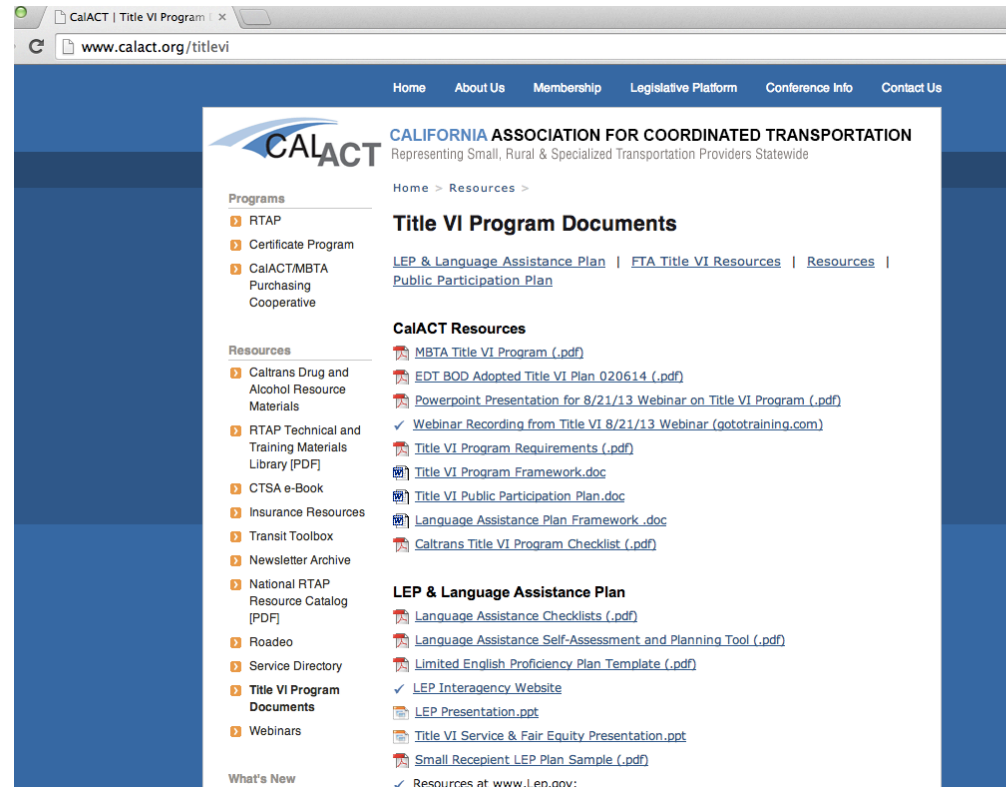


Title VI Resources

RESOURCES

www.calact.org/titlevi

- Sample Plans
- Title VI Program Template
- Language Assistance Plan development tool
- PowerPoints from past trainings, etc.



Reminder:

Requirements differ for fixed route providers with 50 or more vehicles & located in large UZA.

Updating Your Title VI Program

U.S. Department of Commerce
United States Census Bureau

AMERICAN FactFinder

MAIN COMMUNITY FACTS GUIDED SEARCH **ADVANCED SEARCH** DOWNLOAD CENTER

Search - Use the options on the left (topics, geographies, ...) to narrow your search results

Your Selections
Your Selections' is empty

Search using the options below:

Topics
(age, income, year, dataset, ...)

Geographies
(states, counties, places, ...)

Race and Ethnic Groups
(race, ancestry, tribe)

Industry Codes
(NAICS industry, ...)

EEO Occupation Codes
(executives, analysts, ...)

To search for tables and other files in American FactFinder:

- 1 Enter search terms and an optional geography and click **GO**

topic or table name state, county or place (optional)

B16001

GO ?

B16001: LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER

-- or --

Select from **Topics**, **Race and Ethnic Groups**, **Industry Codes**, **EEO Occupation Codes**.

- these are added to 'Your Selections'
- the Search Results are updated

- 2 Next, select **Geographies** (states, counties, cities, towns, etc.)

- these are added to 'Your Selections'
- the Search Results are updated

- 3 Select one or more Search Results and click **View**

Updating Your Title VI Program Approach

Guiding Questions

1. Who interacts with public?
2. Is Program being used?

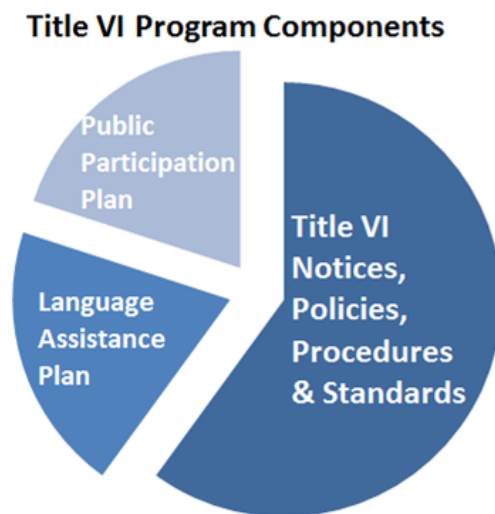
Responses

1. Consult staff (that interacts with public)
 - What is/isn't working
 - Has interaction with LEPs changed?
2. Change Program format/organization
 - PPP and LAP attached as separate documents
 - Quick Reference Sheet (handout) as first page

Updating Your Title VI Program

Handout: UPDATE APPROACH

- What needs to be updated
 1. Contact information, Notice locations, websites
 2. Demographics, especially LEP populations
 3. Public Participation Plan/Language Assistance Plan
 4. Service Standards & Policies



Updating Your Title VI Program

DISCUSSION/QUESTIONS:

- Comments about Update experiences?
- What have you CHANGED in your program?

An orange speech bubble with a tail pointing towards the bottom left.

*Use Update Approach
Handout to organize
your agency's update*

Title VI Triggers

2004 Census Test	United States Census 2010	LANGUAGE IDENTIFICATION FLASHCARD
<input type="checkbox"/>	ضع علامة في هذا المربع إذا كنت تقرأ أو تتحدث العربية.	1. Arabic
<input type="checkbox"/>	Խոսողո՞ւմ ե՞նք 'նշո՞ւմ' կատարե՞ք այս քառակուսում, եթե խոսում կամ կարգում եք հայերեն:	2. Armenian
<input type="checkbox"/>	যদি আপনি বাংলা পড়েন বা বলেন তা হলে এই বাক্সে দাগ দিন।	3. Bengali
<input type="checkbox"/>	ឈ្មួញក្នុងប្រអប់នេះ បើអ្នកអាន ឬនិយាយភាសា ខ្មែរ ។	4. Cambodian
<input type="checkbox"/>	Motka i kahhon ya yangin ûntûngnu' manaitai pat ûntûngnu' kumentos Chamorro.	5. Chamorro
<input type="checkbox"/>	如果你能读中文或讲中文，请选择此框。	6. Simplified Chinese
<input type="checkbox"/>	如果你能讀中文或講中文，請選擇此框。	7. Traditional Chinese

Title VI Guidance | FTA

Secure <https://www.transit.dot.gov/regulations-and-guidance/civil-rights-ada/title-vi-guidance>

Federal Transit Administration

About Funding Regulations & Guidance

Home » Regulations and Guidance » Civil Rights / ADA

Civil Rights / ADA

Americans with Disabilities Act (ADA)

Title VI of the Civil Rights Act of 1964

Overview

Regulations

Guidance

Compliance

Disadvantaged Business Enterprise (DBE)

Equal Employment Opportunity (EEO)

Training Materials

File a Complaint with FTA

FAQ

Title VI Guidance

Title VI Circular

- Title VI Circular 4702.1B, "Title VI Requirements and Guidelines for Federal Transit Administration Recipients"
- Federal Register Notice on Circular 4702.1B (77 FR 52116) August 28, 2012

Limited English Proficiency (LEP)

- DOT's LEP Guidance
- Executive Order 13166 of August 11, 2000: Limited English Proficiency
- Tips and Tools for Reaching LEP Communities in Emergency Preparedness

Other Resources

- Ensuring Equity in Service and Fare Changes
- Memo: Implementing Title VI Requirements in Metropolitan and Statewide Planning

Title VI Triggers

Specific Events with Title VI Implications

Handout: Title VI QUICK REFERENCE SHEET

- A. Public Outreach
- B. Determining new transit facility site
 - Equity analysis required
- C. Fare or Fare Media Change
 - Equity analysis required
 - If more than 50 vehicles/over 200,000 population
- D. Major Service Change
 - Equity analysis required
 - If more than 50 vehicles/over 200,000 population
- E. Agency/Population Growth
 - Additional data, reporting, and monitoring required

Title VI Triggers

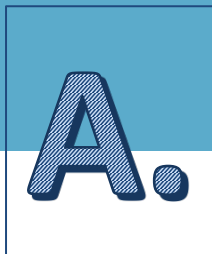
Specific Events with Title VI Implications

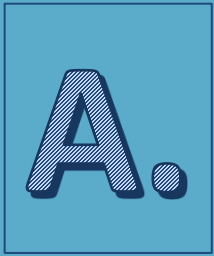
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- A. **Public Outreach**
- B. **Determining New Transit Facility Site**
 - Equity analysis required
- C. **Fare or Fare Media Change**
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 - If more than 50 vehicles/over 200,000 population
- D. **Major Service Change**
 - Equity analysis required
 - If more than 50 vehicles/over 200,000 population
- E. **Agency/Population Growth**
 - Additional data, reporting, and monitoring required

Title VI Triggers

PUBLIC OUTREACH





Public Outreach

Questions to Ask

- Staff trained
- Compliance with PPP
- Providing language assistance
- Proactive outreach strategies

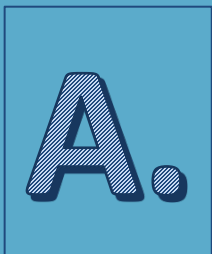
Ways to Integrate Title VI

Studies and Plans

- Short Range Transit Plan
- Major service changes
- Fare changes
- Coordinated Plan Update
- Special grant outreach

Operations

- Bilingual call takers
- Venues, times, format
- Mobility manager's outreach
- Ride Guide in Spanish



Public Outreach

DISCUSSION/QUESTIONS:

- Integrating public participation and Title VI: Recent successful events or formats?
- Any creative strategies for reaching LEP individuals?

Title VI Triggers

DETERMINING NEW TRANSIT FACILITY SITE

B.



Title VI Equity Analysis

Determining New Transit Facility Site

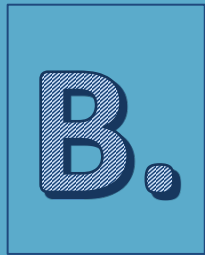
Who: ALL fixed route transit providers

When:

1. Determining site of a transit-related facility (storage or maintenance facilities, operations centers)
2. During the PLANNING process

Purpose: Ensure location is selected without regard to race, color, or national origin.

FTA C 4702.1B, Chapter III-11-12



Title VI Equity Analysis

Determining Site or Location

Requirements

1. Engage in outreach to persons potentially impacted
2. Compare equity impacts of sites
 - consider MULTIPLE ALTERNATIVES
3. Determine if cumulative adverse impacts might result due to similar facilities in area
4. Analysis at Census tract or block group
5. Occur BEFORE selection of preferred site

FTA C 4702.1B, Chapter III-11-12



Title VI Equity Analysis

Determining Site or Location

- What you're looking for:

DISPARATE IMPACT:

Facially neutral policy or practice that disproportionately affects members of a group identified by race, color, or national origin

- If disparate impact exists:

1. Analyze alternatives to determine which has less disparate impacts.
2. Implement least discriminatory alternative.

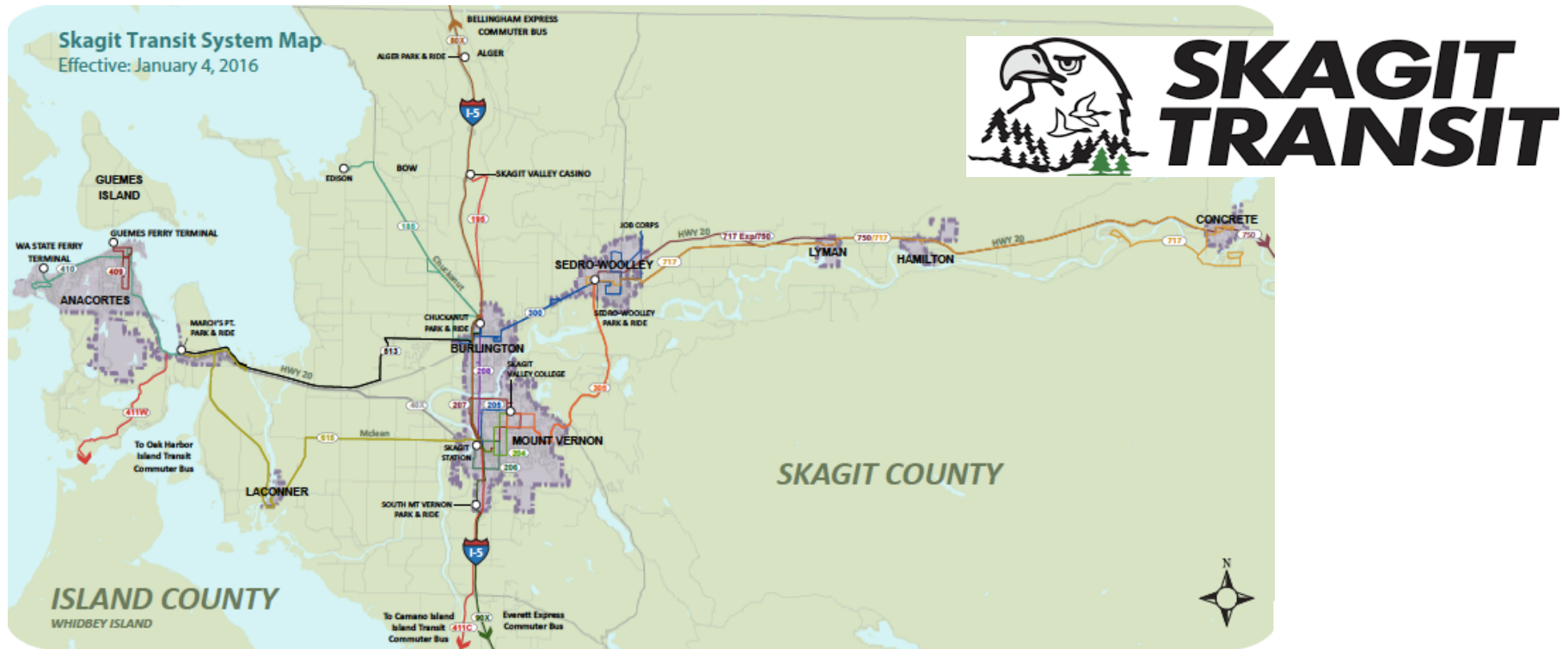
B.

Title VI Equity Analysis

Sample Approach

- Skagit Transit, Skagit County, WA
- Maintenance, Operations and Administration Base

[www.skagittransit.org/assets/1/7/Title VI Equity Analysis for MOA Siting.pdf](http://www.skagittransit.org/assets/1/7/Title_VI_Equity_Analysis_for_MOA_Siting.pdf)





Title VI Equity Analysis

Sample Approach

1. Public Comments on site alternatives (3)
2. Benefits and Burdens Analysis of Alternatives
3. Description of original site ranking process based on facially neutral criteria
4. Alternatives Equity Analysis
5. Cumulative Impacts
6. Conclusion (Interpreting Analyses)



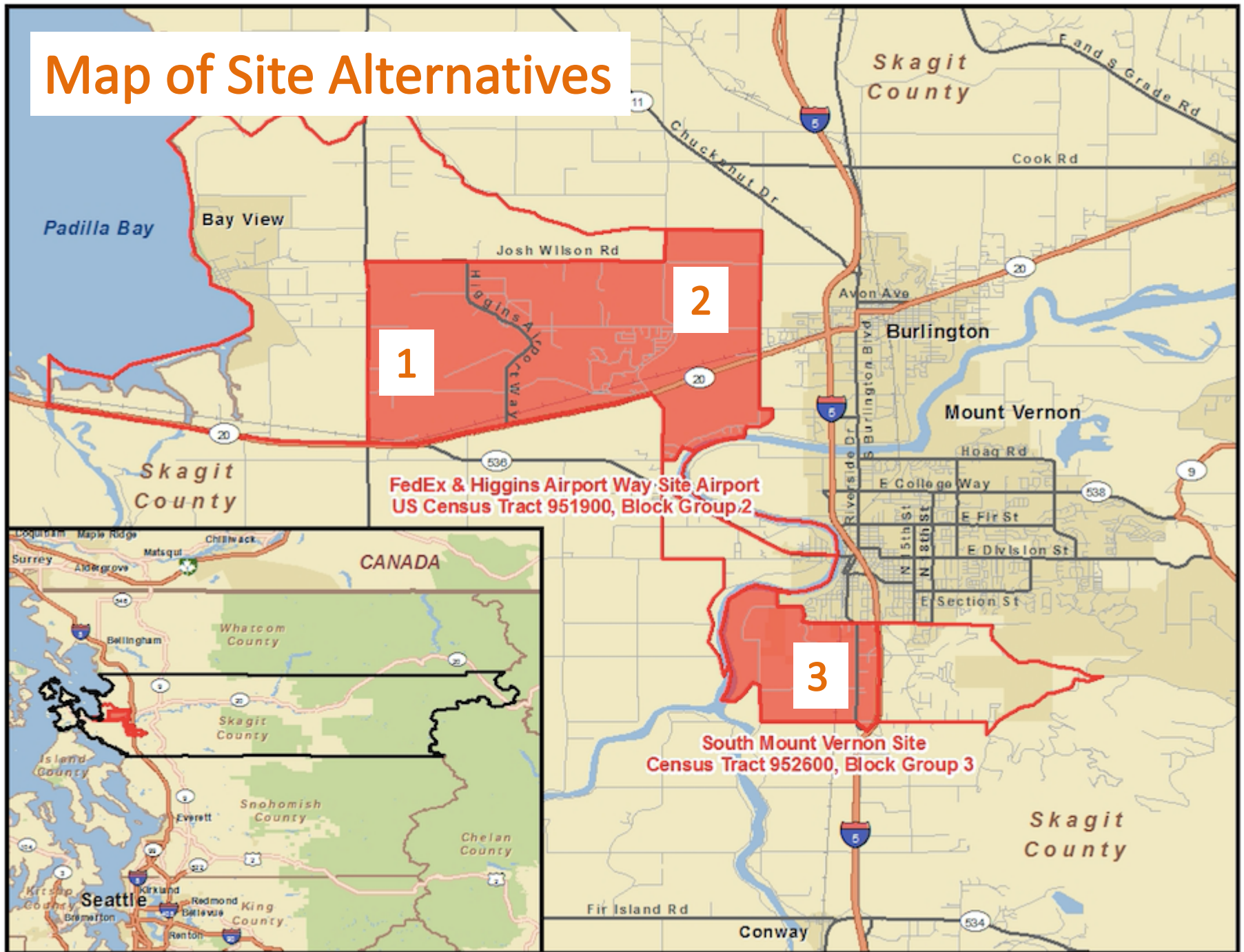


Title VI Equity Analysis

Sample Approach

1. Benefits and Burdens Analysis of each alternative
2. Equity Analysis of Alternatives
3. Cumulative Impacts Analysis

Map of Site Alternatives





Title VI Equity Analysis

Benefits & Burdens Analysis

1. Port of Skagit Properties

Potential Positive Community Impacts (Benefits)	Potential Adverse Community Impacts (Burdens)
1. Absence of residential properties means unlikely that adverse impacts of noise, light and traffic will have adverse impacts.	2. Difficult for public to access due to weak transit service to area and longer travel times.

2. FedEx Property

Potential Positive Community Impacts (Benefits)	Potential Adverse Community Impacts (Burdens)
1. Absence of residential properties means unlikely that adverse impacts of noise, light and traffic will have adverse impacts. 2. Repurposing of existing building will result in minimal environmental impacts.	2. Difficult for public to access due to weak transit service to area and longer travel times.

3. South Mount Vernon Site

Potential Positive Community Impacts (Benefits)	Potential Adverse Community Impacts (Burdens)
1. Increased bus service along Old Highway 99 in south Mount Vernon. 2. Comparable, if not increased, public access to the facility based on distance from population centers and transit availability. 3. Redevelopment of vacant commercial/industrial land to higher use	1. Increased traffic, noise, and light from the facility has the potential to impact residential neighbors – will require adequate mitigation



Title VI Equity Analysis

Benefits & Burdens Analysis

1. Port of Skagit Properties	
Potential Positive Community Impacts (Benefits)	Potential Adverse Community Impacts (Burdens)
1. Absence of residential properties means unlikely that adverse impacts of noise, light and traffic will have adverse impacts.	2. Difficult for public to access due to weak transit service to area and longer travel times. •
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3. South Mount Vernon Site	
Potential Positive Community Impacts (Benefits)	Potential Adverse Community Impacts (Burdens)
1. Increased bus service along Old Highway 99 in south Mount Vernon. 2. Comparable, if not increased, public access to the facility based on distance from population centers and transit availability. 3. Redevelopment of vacant commercial/industrial land to higher use	1. Increased traffic, noise, and light from the facility has the potential to impact residential neighbors – will require adequate mitigation • Additional detail on mitigations?

Enhance Analysis:

Add data

- Current transit levels
- Distances
- Future transit levels
- Some quantitative indicators (service, distances)
- Zoning differences



Title VI Equity Analysis

Alternatives Equity Analysis

Census analysis at Block Group Level
of minority, LEP, Poverty populations

Sites 1 & 2	FedEx and Higgins Airport Way Site Census Block Group
Total Population	2,644
White	2,445
Minority	199
Percent Minority	7.53%
Total in Poverty	178
Percent in Poverty	6.73%
Median Income	\$82,222
LEP (Spanish)	2.1% 54 Count

Site 3	South Mount Vernon Site Census Block Group
Total Population	726
White	561
Minority	165
Percent Minority	22.73%
Total in Poverty	10
Percent in Poverty	1.38%
Median Income	\$55,625
LEP (Spanish)	3.0% 21 Count

Enhance Analysis:

- Contrast with State and County
 - % in poverty
 - % minority
 - median household income
- Consider other variables
 - Residential density



Title VI Equity Analysis

Cumulative Impacts Analysis

	1 Higgins Airport Way	2 South Mt. Vernon	3 FedEx Site
Will selection require displacement of residents or businesses?	No, undeveloped greenfield	No, previously developed brownfield with vacant structures	No, FedEx is vacating site willingly to relocate to new facility in Burlington
List of similar facilities nearby	Uses including transportation and light industrial are located in project vicinity	Autobody, towing, freight transportation, and truck repair shops are in the project vicinity	Uses including transportation and light industrial are located in project vicinity

Enhance Analysis:

- List/quantify similar facilities
- Include distances



Title VI Equity Analysis

Determining Site or Location

DISCUSSION/QUESTIONS:

- Has anyone done a Title VI Equity Analysis for a facility location?
- Other approaches?

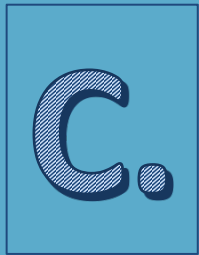
Considering new storage
or maintenance facility?

Conduct Equity Analysis
BEFORE land purchase?

Title VI Triggers

FARE OR FARE MEDIA CHANGE





Title VI Equity Analysis

Change to Fare/Fare Media

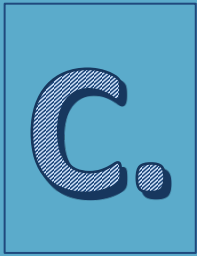
Who: If a transit provider of:

1. Operates 50 or more fixed route vehicles in peak service AND is located in an Urbanized Area (UZA) of 200,000 or more in population; or
2. Provider placed in this category at the discretion of the Director of Civil Rights.

When:

1. Prior to implementation
2. Increase or decrease in fares

Purpose: *To determine whether changes will have a disparate impact based on race, color, or national origin.*



Title VI Equity Analysis

Change to Fare/Fare Media

Requirements:

- Develop written policy/procedures for *measuring fare disparate impacts*
- Conduct Title VI Equity Analysis: *low-income vs. minority populations*
- Identify *alternatives* if disparate impacts identified
- Present to governing board
- Include *procedures, results, and documentation* of Title VI Program Board approval

C.

Title VI Equity Analysis Change to Fare/Fare Media

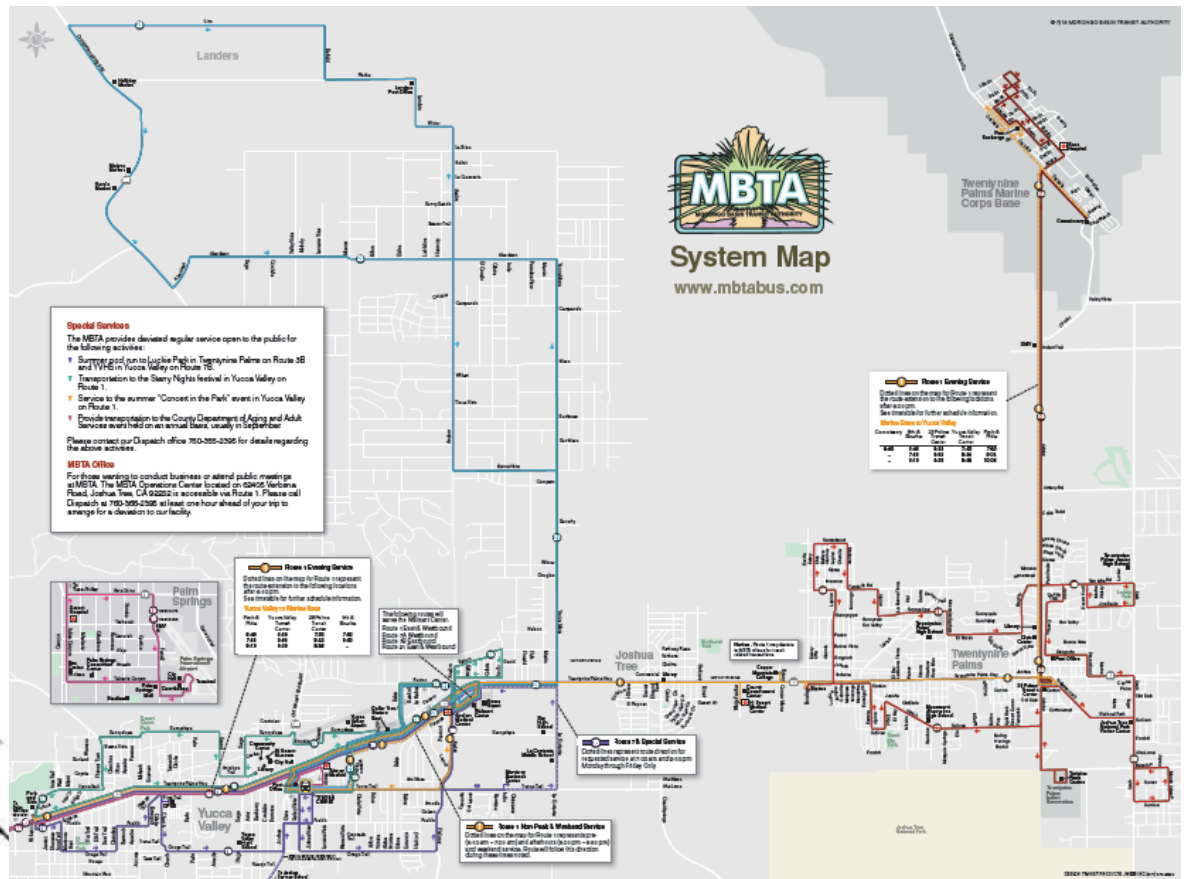
Purpose of Service/Fare

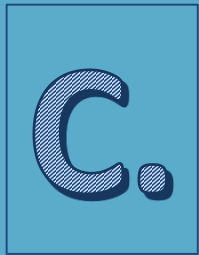
- Analyze how the proposed change will impact low-income & minority populations
- Identify whether there will be a disproportionate impact
- Identify methods to avoid, minimize, and mitigate disproportionate impacts

IMPACT is change defined as a statistical difference between low-income or minority populations and the general public.



- 





Title VI Equity Analysis

Changes to Fare/Fare Media

WHY:

1. Fare increase recommended
 - not analyzed by COA
2. Concern about EQUITY by fare type
 - fare increases may be unfairly distributed among

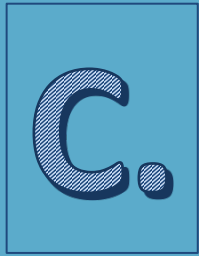
Note: Equity Analysis not required under Title VI for providers.

Will minority riders bear a
DISPROPORTIONATE IMPACT
of the change between the
existing fare and the
proposed fare?

EXPLORING EQUITY:

Answer guiding questions –

1. What was the average fare revenue per trip for...
2. What was the actual percentage discount between average fare and cash fare per trip?
3. What does actual utilization by fare type suggest regarding proposed fare increases and equity issues?



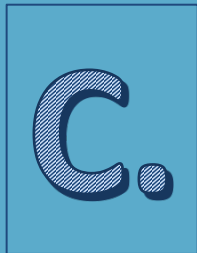
Title VI Equity Analysis

Changes to Fare/Fare Media

FINDINGS:

- Two instances of Equity Concerns:
 - Seniors/ Disabled 50% cash fare increase, twice the Adult/Student cash fare increase of 25%
 - Seniors/ Disabled 50% punch pass increase vs. ReadyRide general public base fare increase by 25%
- Monthly passes are undervalued
- Recommendations of new fare alternative:
Equitable distribution of fare increases, within fare categories and across fare types/groups





Title VI Equity Analysis

Changes to Fare/Fare Media

PUBLIC PARTICIPATION: A FAIR FARE

- Following analysis, **before implementation**
- Publicized proposed increases and invited input
- Comments invited by:
 - phone
 - Mail
 - Email
 - 4 open houses
 - 1 public hearing
- Events widely advertised in English and Spanish

A "Fair Fare" for MBTA

In July the Morongo Basin Transit Authority will raise its fares for the first time since 1999. MBTA works very hard to keep fares low, because we know how important economical transit service is to our riders. But to make sure the bus system stays affordable for all riders, we must increase fares to reflect our increased costs. Below is a comment on the proposed fares, please attend our

Un "precio justo" para MBTA

En el mes de julio, Morongo Basin Transit Authority (MBTA) subirá sus tarifas por primera vez desde 1999. En MBTA trabajamos muy duro para conservar tarifas bajas porque sabemos lo importante que es recibir un servicio de transporte económico para nuestros pasajeros. Sin embargo, para garantizar que el autobús estará ahí para usted hoy y en el futuro tenemos que aumentar las tarifas para reflejar nuestro incremento en los costos. A continuación se muestra una tabla con nuestro cambio de tarifa propuesto. Si desea formular observaciones sobre las tarifas propuestas, asista a nuestra audiencia pública, llame, escriba o visite nuestro sitio web mbtabus.com.

Tipo de tarifa	Tarifa actual	Tarifa propuesta (1 de julio de 2014)
Ruta 1 Intercity Highway		
Regular	\$2.00	\$2.50
Personas mayores/Discapacitados	\$1.00	\$1.25
Rutas en vecindarios (Rutas 3, 7 y 21)		
Regular	\$1.00	\$1.25
Personas mayores/Discapacitados	\$0.75	\$1.00
Pase de un día (Rutas 1, 3, 7 y 21)		
Regular	\$3.00	\$3.75
Estudiantes/Personas mayores/Discapacitados	Pase nuevo	\$3.00
Pase de 31 días (Rutas 1, 3, 7 y 21)		
Regular	\$30.00	\$40.00
Estudiantes/Personas mayores/Discapacitados	\$20.00	\$25.00
Pase de 7 días (Solo en la Ruta 12)		
Regular	\$35.00	\$42.00
Estudiantes de Cooper Mtn. College	\$25	\$50
Ready Ride		
Regular	\$4.00	\$5.00
Estudiantes/Personas mayores/Discapacitados	\$1.50	\$2.00
Ready Ride (Sénior Discapacitados)		
Pase para perforar (Punch Pass) de 10 viajes	\$10.00	\$15.00
Pase para perforar (Punch Pass) de 20 viajes	\$20.00	\$25.00

Proposed Fare (July 1, 2014)

\$2.50

\$1.25

\$1.25

\$1.00

\$3.75

\$3.00

\$40.00

\$25.00

\$42.00

\$5.00

\$2.00

\$15.00

\$25.00

fare change.

comments@mbtabus.com

?

Yucca Valley Transit Center
Friday, March 6th
11 to 12 noon and 1 PM to 3 PM



95 mbtabus.com

Envíe un comentario sobre el cambio de tarifa de MBTA.

Por teléfono: 760.366.2395

Por correo electrónico: comments@mbtabus.com

Por correo postal: MBTA, 62405 Verbena Rd, Joshua Tree, CA 92252

Hable personalmente con el personal de MBTA:

• Yucca Valley Transit Center
Miércoles, 5 de marzo
10 a.m. a 12 mediodía y de 1 p.m. a 3 p.m.

• Twenty-nine Palms Transit Center
Jueves 6 de marzo
10 a.m. a 12 mediodía y de 1 p.m. a 3 p.m.

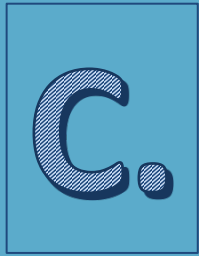
O asista a nuestra audiencia pública

Jueves 3 de abril - 5:00 p.m.

Joshua Tree Operations Center
62405 Verbena Road, Joshua Tree, CA 92252



760-366-2395 mbtabus.com



Title VI Equity Analysis

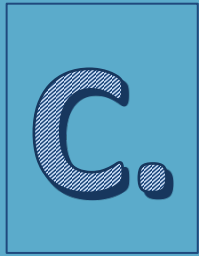
Changes to Fare Media

METROLINK FARE MEDIA ANALYSIS

Cashless Ticketing Device, Title VI Equity Analysis

- AMMA review of Metrolink Analysis for San Bernardino County Transportation Authority (SBCTA)
- Do cashless ticketing devices presented special difficulties for persons of low-income who are “unbanked”?
- Does this present a disparate impact to cash-based households?





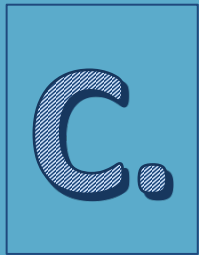
Title VI Equity Analysis

Changes to Fare Media

Cashless Ticketing Device

- Cash based:
 - 20% of collected fare revenue
 - 40% of fare transactions
 - Suggests shorter trips more likely cash-based
- Hypothesis:
 - Transit dependent riders take short trips to travel quickly between communities.
 - May have more limited use of debit or credit cards, with associated fees
- Support:
 - TRB 2017 study saw high correlation between taxi users who pay cash and “unbanked”, low-income households (King & Saldarriaga, 2016)





Title VI Equity Analysis

Changes to Fare Media

About the region

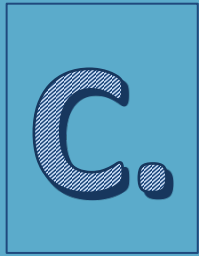
- San Bernardino line, 6 stations, heaviest use among all lines
- Both rail and transit ridership in region are from low-income households



About Metrolink's analysis

- Metrolink's outreach did not adequately reflect local demographics
 - Insufficient representation of low-income
 - No platform interviews in Spanish





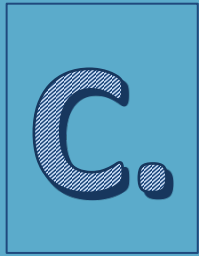
Title VI Equity Analysis

Changes to Fare Media

Conclusion

- AMMA questioned Metrolink conclusion: *“share of minority respondents adversely impacted are just 3.2% greater than the share of the non-minority respondents”*
- AMMA questioned Metrolink remediation of disparate impacts
- AMMA proposed securing retail outlets for Metrolink cash ticket purchase





Title VI Equity Analysis

DISCUSSION/QUESTIONS:

- Has anyone performed a Title VI fare equity analysis?
- Lessons learned?

BONUS BENEFIT –
effective outreach
upfront generates
acceptance of
subsequent fare
increases

Title VI Triggers

MAJOR SERVICE CHANGE

A stylized blue logo consisting of a large capital letter 'D' followed by a period, enclosed within a square frame that is split horizontally into blue (top) and white (bottom) sections.



Title VI Equity Analysis

Major Service Change

Who: If a transit provider

1. Operates 50 or more fixed route vehicles in peak service AND is located in an Urbanized Area (UZA) of 200,000 or more in population; or
2. Has been placed in this category at the discretion of the Director of Civil Rights.

When: PRIOR to implementation

Purpose: To determine whether changes will have a disparate impact based on race, color, or national origin.



Title VI Equity Analysis

Major Service Change

Requirements:

- Develop major service change policy
- Develop written procedures to evaluate all service changes that exceed your major service change threshold.
- Conduct Equity Analysis
 - Looking for **Disparate Impacts, Adverse Effects,** or **Disproportionate Burdens**
- Present to governing board
- Include procedures, results, and documentation of Board's approval/awareness in Title VI Program.

Title VI Equity Analysis

Major Service Change Policy

Major Service Change Policy

- Examples from Washington Metropolitan Area Transit Authority

Parameters	Metrobus Definitions	Public Hearing Required?
Span	Increase or decrease in span of service on a line of more than one hour in a single fiscal year.	Yes, if there is a reduction of more than one hour in span of service on a line.
Frequency	Increase or decrease in revenue miles on a line of more than 20% in a single fiscal year.	Yes, if there is a reduction of more than 20% in revenue miles.
Coverage/ Availability	Increase or decrease in route miles on a line of 15% in a single fiscal year.	Yes, if there is a reduction of 15% in route miles.
	Projected Increase or decrease of 10% of the riders on a line in a single fiscal year.	Yes, if there is a reduction of 10% of riders.



Title VI Equity Analysis

Major Service Change

- What is a “Major Service Change” for your agency?
 - BASELINE: What is the change from?
 - Policy based on approaching a threshold
 - Consider:
 - Hours of Service
 - Miles of Service
 - Frequency
 - Routes

“The threshold for analysis shall not be set so high so as to never require an analysis; rather, agencies shall select a threshold most likely to yield a meaningful result in light of the transit provider’s system characteristics.”
FTA C4702.1B

Developing Implementation Guidance

Implementation Guidance

Developing a Title VI To-Do List

Handout: IMPLEMENTATION GUIDANCE

Title VI Implementation Guidance

1. Print a Title VI Program and ensure and other materials are available at reception
 - Ensure Language Line information and instructions are available for all staff (office and operators that communicate with the members of the public).
 - Keep “I speak” flashcards at reception; on buses and available at public events
 - Download and print at: <https://www.lep.gov/ISpeakCards2004.pdf>
2. Update all posted Title VI Notices to reflect current information.
3. Determine best alternative for website translation and implement.
4. Develop staff training program and materials and implement.

Implementation Guidance

Developing a Title VI To-Do List

Handout: IMPLEMENTATION GUIDANCE

- What's missing?
 - Title VI Documents on website
 - Complaint forms at reception
 - Is Title VI Notice on buses/ in public buildings
- Who needs to know about Title VI?
 - Develop and Implement training
 - Supporting staff
 - Remembering Title VI Triggers
- Revisiting WHY?

Implementation Guidance

RESOURCES

- CalACT's website

<http://www.calact.org/titlevi>

- “I Speak Cards”

<https://www.lep.gov/ISpeakCards2004.pdf>

- Language Line Solutions

- FTA resources

<https://www.transit.dot.gov/regulations-and-guidance/civil-rights-ada/title-vi-civil-rights-act-1964>

Q&A and Discussion

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