Title VI Compliance Program 2013-2016

Board of Directors
October 5, 2016
PD&S Item 2

Presentation Overview

• Title VI Background & Program Deadlines
• Title VI Compliance Program 2016
• Next Steps
• Questions
Title VI of the Civil Rights Act of 1964:

“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.”

- FTA regulates and monitors transit agencies that receive federal funding in several areas, including Title VI
- SamTrans is required to submit program and receive FTA approval every 3 years
- FTA issued new requirements and guidelines Oct 1, 2012
- SamTrans Title VI program report due to FTA Oct 7, 2016
Title VI Submittal Requirements

• General Requirements
  – Title VI Notice to Public
  – Title VI Complaint Procedures
  – List of Investigations, Complaints, or Lawsuits
  – Public Participation Plan
  – Language Assistance Plan
  – Membership of Non-elected Committees
  – Subrecipient Monitoring
  – Board Resolution
  – Construction Projects
  – Additional Information upon Request

• Requirements of Transit Providers
  – Service Standards and Policies
  – Demographic and Service Profile
  – Demographic Ridership and Travel Patterns
  – Monitoring Program Results
  – Public Engagement for Policy Development
  – Title VI Equity Analyses
Title VI Submittal Requirements

• Title VI public notice posted
  – Headquarters
  – On all buses

• Complaint procedures followed
  – No pending lawsuits or complaints

• Non-elected committee membership diversity (Citizens Advisory Committee)

Title VI Submittal Requirements

• Subrecipient monitoring
  – Peninsula Jewish Community Center

• Construction Projects
  – SamTrans has none
Public Participation Plan

• SamTran’s second formal PPP submission
• Provides information about outreach methods to engage minority and LEP populations
• Outlines public participation process
• Provides summary of outreach efforts made since last program submission

Language Assistance Plan

• Outlines how language assistance will be provided to persons with LEP
• Identifies “Safe Harbor” languages in SamTrans service area
  – Determined through ACS census data
  – Speak English less than “very well” and constitute at least 1,000 persons in the county
• New training for frontline employees
  – I Speak card
Language Assistance Plan

• “Safe Harbor” languages
  – Spanish
  – Chinese
  – Tagalog
  – Japanese
  – Arabic
  – Vietnamese
  – Korean
  – Hindi

Service Standard and Policies

• Major Service Change Policy
• Disparate Impact Policy
• Disproportionate Burden Policy
• System-wide Service Standards
• System-wide Service Policies
• Board adopted in March 2013 following extensive public participation process
• Monitoring analysis and findings reveal service is being delivered with no disparate impact
Title VI Equity Analyses

- Fare Equity Analysis – SamTrans Codified Tariff Adjustments
  - October 2015 completed
  - November 2015 adopted
- Service Equity Analysis – Elimination of FLX San Carlos
  - June 2016 completed & adopted

Next Steps

- Requesting Board approval of SamTrans Title VI Program
- Approved Title VI Program will be submitted to FTA by Oct 7, 2016
- Staff will continue to monitor Title VI performance for compliance with the Title VI Program and for FTA reporting
- Any changes or modifications to any policies will be brought before the Board as necessary
Questions?