




Title VI Compliance Program 2013 Adoption

Board of Directors
November 7, 2013

The slide features a red background with a white and grey border. The Caltrain logo is in the top left. The main title is centered in white text. The date and meeting information are in the bottom right. A faint image of a train is visible in the background.



Presentation Overview

- Title VI Background & Program Deadlines
- New FTA Title VI Requirements & Guidelines
- Title VI Compliance Program 2013
- Next Steps
- Questions

2

The slide features a white background with a red and grey border. The Caltrain logo is in the top left. The title 'Presentation Overview' is in bold black text. Below it is a bulleted list of five items. The number '2' is in the bottom right corner. A faint image of a train is visible in the background.



Title VI Background

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.”


3



Title VI Background

- FTA regulates and monitors transit agencies that receive federal funding in several areas, including Title VI
- Caltrain has submitted triennial Title VI program reports for several cycles
- The FTA issued new requirements and guidelines on Oct. 1, 2012
- Caltrain’s triennial Title VI program report due to the FTA on Dec. 1, 2013


4



New FTA Title VI Requirements

- Requires Board approval of the overall Title VI Program prior to next program submission
- Required Board approval of specific policies within Title VI (Approved: April 2013)
 - Policy on major service changes
 - Policies on disparate impact and disproportionate burden for specific populations
 - System-wide service standards and policies

5



New FTA Title VI Guidelines

- Conduct updated demographic and travel pattern survey of passengers at least every 5 years (Caltrain conducts this every 3 years)
- Develop a formal Public Participation Plan
 - Informed by the Language Assistance Plan
- Report racial breakdown of membership of agency-appointed membership advisory committees; encourage and solicit minority participation

6



Title VI Process

- Developed over the course of the last 6 months
- Leveraged Title VI work performed in other counties
- Follows checklist approach identified by FTA circular
- Provides the basis for Title VI compliance and monitors performance against previously established standards

7



Title VI Submittal Requirements


GENERAL REQUIREMENTS

- a. Title VI Notice to Public
- b. Title VI Complaint Procedures & Form
- c. List of Investigations, Complaints, or Lawsuits
- d. Public Participation Plan
- e. Limited English Proficiency Language Assistance Plan
- f. Membership of Non-elected Committees
- g. Sub-recipient Monitoring
- h. Evidence of Board Approval
- i. Construction Projects

REQUIREMENTS OF TRANSIT PROVIDERS

- a. Service Standards and Policies
- b. Demographic and Service Profile
- c. Demographic Ridership and Travel Patterns
- d. Monitoring Program Results
- e. Public Engagement for Policy Development
- f. Title VI Equity Analyses


8



Title VI Submittal Requirements (cont.)

- Title VI public notice posted
 - Headquarters (3 locations)
 - At all stations
 - Caltrain website
- Complaint procedure established
 - No pending lawsuits or complaints
- Non-elected committee membership
 - Identify processes to encourage participation by minorities

9



Title VI Submittal Requirements (cont.)

- Subrecipient monitoring
 - JPB has no subrecipients
- Construction Projects
 - The JPB hasn't recently constructed any projects, such as a vehicle maintenance storage facility, maintenance facility, or operation center

10



Public Participation Plan

- Caltrain's first formal Public Participation Plan submission
- Discusses the strategies used to attain feedback for the Public Participation Plan
- Provides information about outreach methods to engage minority and limited English proficient populations, as well as summary of outreach efforts made since the last Title VI Program submission
- A toolbox for outreach

11



Limited English Proficiency & Language Assistance Plan

- Outlines how language assistance will be provided to persons with limited English proficiency
- Identifies clearly what languages predominate in the Caltrain service area
- Various data sources used to determine these languages (community based organizations and partner agencies)

12



LAP Languages

Three categories of languages identified

- **Primary Language:** Spanish predominates in the service area
- **Secondary Languages** (nine): Others that have a significant representation
- **"Safe Harbor" Languages** for vital document translation (22): 5% or more than 1,000 persons

13



Service Standards and Policies

- Board adopted in April 2013 following extensive public participation process
- Monitoring analysis and findings reveal service is being delivered with no disparate impact

14



Title VI Equity Analyses

- Two completed under old FTA Circular
- JPB Title VI Equity Evaluation Proposed Fare Change FY 2012 dated 5/11/2011
- JPB Title VI Equity Evaluation Proposed Fare Change FY 2013 dated 4/1/2012
- JPB did not consider any other major service changes during the review period that met the threshold defined by standards


15




Next Steps

- Requesting Board approval of the Caltrain Title VI Program
- Approved Title VI Program will be submitted to the FTA by Dec. 1, 2013
- Staff will continue to monitor Title VI performance compared with the Title VI Program
- Since the Title VI Program is a "Living Document," any changes or modifications to any of the policies will be brought before the Board as necessary

16



Questions?



17

The slide features a white background with a red border. The Caltrain logo is in the top left. The word "Questions?" is centered in bold black text. A faded image of a train is in the bottom left. The number "17" is in the bottom right.