



Title VI Compliance Program 2016 Adoption

Board of Directors
November 3, 2016
Agenda Item 13



Presentation Overview

- Title VI Background & Program Deadlines
- FTA Title VI Requirements & Guidelines
- Title VI Compliance Program 2016
- Next Steps
- Questions



FTA 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.”

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Title VI Background

- FTA regulates and monitors transit agencies that receive federal funding in several areas, including Title VI
- Caltrain is required to submit program and receive FTA approval every 3 years
- FTA issued new requirements and guidelines Title VI Circular (C4702.1B) – Oct. 1, 2012
- Caltrain 2016 Title VI program report due to the FTA on Dec. 1, 2016

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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 (PPP)
- e. Limited English Proficiency (LEP) Language Assistance Plan (LAP)
- f. Ethnicity of Members of Non-elected Committees
- g. Sub-recipient Monitoring (N/A for Caltrain)
- h. Evidence of Board Approval
- i. Construction Facilities Information

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

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Title VI Submittal Requirements

- Title VI public notice posted
 - Headquarters (Lobby/Auditorium),
Station Info. Boards, Caltrain Website
- Complaint procedures updated & followed
 - No pending lawsuits or complaints
- Non-elected committee membership diversity (CAC, BAC)
- Construction Facilities Information
 - In past 3 yrs. no Facility Equity Analyses required

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Title VI Program Changes from 2013

- Limited English Proficiency Language Assistance Plan (update)*
- Public Participation Plan (update)*
- Service Standards and Policies Monitoring
- Demographic Profile Maps (update)*
- Equity Analyses Performed

* Updated to reflect to new data sources

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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 based on *new data* (census data, Dept. of Education, consultation with frontline staff and Community Based Organizations)
- Updated "Vital" and "Non-Vital" Document List
- Included new training for Frontline Employees

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Language Assistance

- "I-Speak" card (Distributed: Aug. 2016)

Translations

Free Language Assistance

For translations, please call 1.800.660.4267

Free Language Assistance

Para traducciones, por favor llame al 1.800.660.4267

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LAP Languages

Three categories of languages identified:

- **Primary Language:** Spanish predominates in the service area
- **Tier One Languages:** Spanish and Chinese
- **Tier Two Languages:** Vietnamese, Tagalog, Korean, Russian, Japanese, Persian and Hindi.
- **Tier Three "Safe Harbor"*** Languages for vital document translation in addition to those listed above: Arabic, Portuguese, French, Mon-Khmer Cambodian, Thai, Italian, Urdu, Gujarati, German, Serbo-Croatian and Armenian.

* languages that constitute either 5% or 1,000 persons within service area, whichever is less



Public Participation Plan

- Refines the strategies used to attain customer and community feedback
- Provides information about outreach methods to engage minority, low-income and limited English proficient populations
- Includes a summary of outreach efforts made since the last Title VI Program submission
- Includes Community Based Organization (CBO) Survey (new 2016)

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Title VI Policies

- Major Service Change Policy
- Disparate Impact Policy
- Disproportionate Burden Policy
- Board adopted in April 2013 following extensive public participation process

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Service Standards and Policies

- System-wide Service Standards:
 - Vehicle Load, Vehicle Headways, On-Time Performance, Service Availability
- System-wide Service Policies:
 - Vehicle Assignment, Transit Amenities
- No change to Board adopted policies from April 2013
- Monitoring analysis and findings reveal service is being delivered with no disparate impact on minority populations and disproportionate burden on low-income populations.

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Title VI Equity Analyses

- Additional Regional Clipper Use Incentive & Change in Youth Age
 - Completed: June 2014
 - Adopted: July 2014
 - Effective: Oct. 5, 2014 & Jan. 1, 2015
- Fare Changes to the Caltrain Codified Tariff
 - Completed: November 2015
 - Adopted: December 2015
 - Effective: February 2016

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Next Steps

- Requesting Board approval of the Caltrain Title VI Program
- Approved Title VI Program will be submitted to the FTA by Dec. 1, 2016
- Staff will continue to monitor Title VI performance compared with the Title VI Program
- Continue to update & improve Title VI Training
- Title VI Program is a “Living Document,” and any changes or modifications to any of the policies will be brought before the Board as necessary.

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Questions?

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