



Item 8

DATE: February 8, 2018
MEMO TO: TRANSCOM
FROM: MARTIN R. ERICKSON, PUBLIC TRANSIT DIRECTOR
SUBJECT: DRAFT VCTC 2018 TITLE VI PROGRAM UPDATE

RECOMMENDATION:

- Review and Comment on the Draft VCTC 2018 Title VI Program Update

DISCUSSION:

The Federal Transit Administration (FTA) requires recipients of federal assistance to provide assessments of compliance with Title VI of the Civil Rights Act of 1964 as part of the grant approval process. An updated plan must be submitted by grantees every three years; VCTC will submit the attached report by July 31, 2018. Title VI regulations mandate that no person in the United States shall, on the ground of race, color and national origin, be excluded from participation in, or be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance from the FTA.

The Commission's commitment to ensuring that its services are delivered and implemented in accordance with Title VI is described in the Non-Discrimination notice and procedures that were adopted by the Commission on October 10, 2012. The existing practices conform to Caltrans' requirements for implementing Title VI and the Americans with Disabilities Act (ADA) regulations. However, as a recipient of FTA funds, requirements for implementing Title VI are more extensive and require the adoption of a Title VI program under the guidelines set forth in FTA Circular 4702.1B, *Title VI Requirements and Guidelines for Federal Transit Administration Recipients*.

The Circular has general requirements and guidelines for all recipients and additional requirements for fixed route transit providers. Below is a summary of the 2018 VCTC Title VI Program:

- **Title VI Notice to the Public** – Notice posted in public locations (website, buses, brochures, etc.)
- **Title VI Complaint Procedures**
- **Title VI Complaint Form**
- **List of transit-related Title VI investigations, complaints, or lawsuits** – FTA requires that a list of cases be held for five years.
- **Public Participation Plan** – VCTC's plan to promote inclusive public participation through the use of outreach events, bilingual material and the Unmet Needs process, etc.

- **Language Assistance Plan** – VCTC’s strategy to ensure meaningful access for persons who are limited-English proficient (LEP) through use of bilingual materials, bilingual customer service staff, interpretation services, etc.
- **Membership of non-elected committees and councils**
- **Monitoring procedures for subrecipients** – Primary recipients are responsible for establishing monitoring procedures for its subrecipients who are extended federal funds, unless the subrecipient is also a direct recipient of FTA funds.
- **Title VI equity analysis for the site and location of facilities** – For this current report this requirement is not applicable to VCTC.
- **Documentation that the governing board has reviewed and approved the Title VI program**
– A copy of meeting minutes or a resolution must be submitted with the Title VI Program Report.

After review by TRANSCOM on February 8, 2018, staff plans to bring the Title VI Program to the Commission for approval at the March 2, 2018 meeting. Upon approval of the Title VI Program by the Commission, staff will submit the report to FTA via the Transit Award Management System (TrAMS) system. Concurrence and approval of the report by the FTA Regional Civil Rights Office is anticipated within 30 days. The Title VI Program will be updated every three years, or as necessary, when guidelines are revised or as compliance reviews require.

Attachment: VCTC 2018 Title VI Program Report