

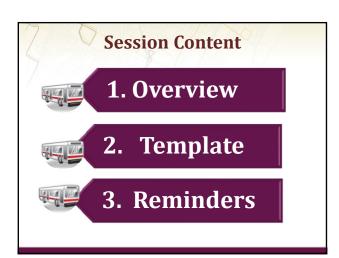
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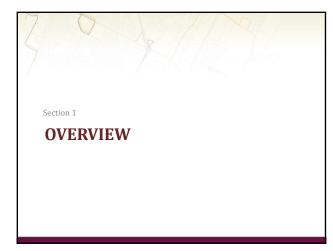
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Reminder

- Basic Principle of Title VI:
 - 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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Reminder

- Definition of Discrimination:
 - Any action or inaction, whether intentional or unintentional, in any program or activity of a Federal aid recipient, subrecipient, or contractor that results in disparate treatment, disparate impact, or perpetuating the effects of prior discrimination based on race, color, or national origin.

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Update Schedule

- Today-June 19:
 - o Update your policy and
 - Email Bethany at <u>brenner@rlsandassoc.com</u> to review and provide feedback
- June-July 14:
 - o You address comments, finalize Plan
 - $\circ\;$ receive local approval from board of directors of appropriate entity
 - Plan must be submitted to NHDOT with a copy of Board resolution, meeting minutes or similar evidence of approval
- July 17-21:
 - o NHDOT will issue Concurrence Letter

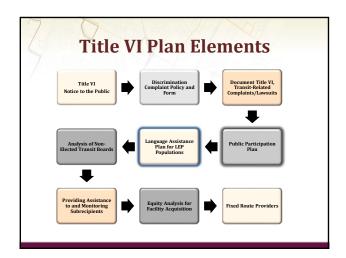
Section 2

TEMPLATE

Template Materials

- Template materials can be found on the NHRTAP website
- https://www.newhampshirertap.com/blank-page
 - $\circ \ \ Compliance\ page,\ Title\ VI\ section$

Active fields for you to enter information "Insert Agency Name" Use of comments to provide guidance Reviewer will use track changes when providing feedback



- Plan Approval & Compliance
 - Board Approval Signature, Copy of Meeting Minutes or Approval by Board of Directors, etc.
 - o Annual Certifications and Assurance
 - o Policy Statement

- Notice to the Public
 - o Complaint contacts
 - Posted in public areas and website
 - Update Plan to add locations where notice posted
 - Translate into languages as needed

Notifying the Public of Rights Under Title VI

- Insert Agency Name
 The Insert Agency Name operates its programs and services without rega
- believes she or he has been aggrieved by any unlawful discriminatory practice under VI may file a complaint with the **Insert Agency Name**.
- For transportation-related Title VI matters, a complaint may also be filed directly with the:

New Hampshire Department of Transportation, Attn: Shannon Alton, Title 1 Coordinator, PO Box 483, 7 Hazen Drive Concord, NH 03302-0483; 603-271-2467; TT 800-735-2645; titles@Bdct.nh.gov
Federal Transit Administration, Office of Civil Rights, Attention: Compolate Team, Ea

If information is peeded in another language contact YOY-YOY-YOY

Title VI Plan Elements

- Complaint Procedures
 - o Verify procedures and forms are current
 - o Have a designated Title VI liaison at your agency
 - $\circ\,$ Translate complaint procedure and form as needed
 - Include a link to your website to where complaint procedure and form can be found

Title VI Plan Elements Complaint Form





• Investigations, Complaints and Lawsuits

	Date (Month, Day, Year)	Summary (include basis of complaint: race, color, or national origin)	Status	Action(s) Taken
Investigations				
1.				
2.				
Lawsuits				
1.				
2.				
Complaints				
1.				
2.				

Title VI Plan Elements

- Public Participation Plan
 - Update any outreach activities completed in the past three years, think building off last submission's activities
 - Review your PPP to verify all members of the public are encouraged to participate, including
 - Minorities
 - Limited English Proficient (LEP) Populations
 - Low Literacy Populations

- Language Assistance Plan (LAP)
 - Reasonable steps to ensure meaningful access to benefits, services, information and other important portions of their programs and activities for individuals who are Limited English proficient (LEP).
 - People speaking English less than "very well" (American Community Survey, U.S. Census)

- Language Assistance Plan (LAP)
 - o Meaningful Access
 - Ability to access/call to ask questions or inquire for a ride
 - Options to talk in person to staff
 - Translation services are easily accessible and available to everyone
 - Posting signs and including translation statements in appropriate languages for vital documents

Title VI Plan Elements

- Language Assistance Plan (LAP)
 - o Results of the Four Factor Analysis
 - 1: **Number and proportion** of LEP persons in service area
 - 2: **Frequency** with which LEP persons come in contact with program
 - 3: Importance of Service to quality of life
 - 4: Resources available to LEP outreach

- Language Assistance Plan (LAP)
 - Number and proportion of LEP population assessed with data
 - Language Spoken at Home for the Population 5 Years and Over
 - American Community Survey, U.S. Census, https://data.census.gov/table?q=c16001&tid=ACSDT5Y2021.C16001
 - Safe Harbor Provision: Written translation of vital documents for each eligible LEP language group that constitutes 5% or 1,000 persons, whichever is less, persons eligible or likely to be served, affected, or encountered

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Language Spoken at Home for the Population 5 Years and Over	Stark Co	unty, Ohio
Label	Estimate	Percent of Population
Total:	353,806	
Speak only English	342,364	96.77%
Spanish:	4,118	1.16%
Speak English "very well"	2,555	0.72%
Speak English less than "very well"	1,563	0.44%
French, Haitian, or Cajun:	452	0.13%
Speak English "very well"	385	0.11%
Speak English less than "very well"	67	0.02%
German or other West Germanic languages:	1,724	0.49%
Speak English "very well"	1.226	
Speak English less than "very well"	498	0.149
Russian, Polish, or other Slavic languages:	748	0.21%
Speak English "very well"	567	0.16%
Speak English less than "very well"	181	0.059
Other Indo-European languages:	2.190	0.62%
Speak English "very well"	1,559	0.44%
Speak English less than "very well"	631	0.189
Korean:	86	0.02%
Speak English "very well"	36	0.019
Speak English less than "very well"	50	0.01%
Chinese (incl. Mandarin, Cantonese):	438	0.12%
Speak English "very well"	224	0.06%
Speak English less than "very well"	214	0.069
Vietnamese:	272	0.08%
Speak English "very well"	83	
Speak English less than "very well"	189	0.059
Tagalog (incl. Filipino):	324	
Speak English "very well"	293	
Speak English less than "very well"	31	0.01%
Other Asian and Pacific Island languages:	572	
Speak English "very well"	477	
Speak English less than "very well"	95	0.03%
Arabic:	259	
Speak English "very well"	144	
Speak English less than "very well"	115	
Other and unspecified languages:	259	
Speak English "very well"	158	
Speak English less than "very well"	101	

- Service Area
- Number of People
- Percent of Total Population
- Which language category meets the Safe Harbor Provision?

- Language Assistance Plan (LAP)
 - Required elements in conjunction with Four Factor Analysis
 - How do you provide language assistance services?
 - How do you provide notice to LEP persons?
 - How do you monitor, evaluate and update the LAP?
 - How do you train employees to provide timely and reasonable language assistance to LEP populations?

- Minority Representation Information
 - Updated information about members of your non-elected **transit** planning and advisory board, may be nonapplicable to your agency
 - Non-elected board make-up should reflect the racial composition of your community

Body	Caucasian	Hispanic	African American	Asian American	Native American	Two or More Races
[Insert Name of Committee/Board]	%	%	%	%	%	9

- Providing Assistance and Monitoring Subrecipients
 - $\,\circ\,$ Verify compliance from the subcontractor
 - Ensure the Complaint Process/Form and Title VI Notice to the Public is distributed
 - o Can be nonapplicable to your agency

Title VI Plan Elements

- Equity Analysis for Facility Acquisition
 - If you have not constructed a facility, this requirement does not apply

Title VI Plan Elements

 Fixed Route Transit Providers Service Standards and Policies

Requirement	Fixed Route Transit Providers that do not meet the threshold	Transit Providers with 50 or more fixed route vehicles in peak service, located in large UZA
Set system-wide standards and policies	Required	Required
Collect and report data	Not required	Required: Demographic and service profile maps and charts Survey data regarding customer demographic and travel patterns
Evaluate service and fare equity changes	Not required	Required
Monitor transit service	Not required	Required

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Reminders

- Read the Plan template closely and make it reflect what you do
- Update your website with at least the public notice, compliant process and form
- Keep minutes or a form signed with local approval of the Plan
- Keep your staff informed on policies such as Title VI and impacts related to language translation, etc.

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Presenter

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Compliance > Title VI