



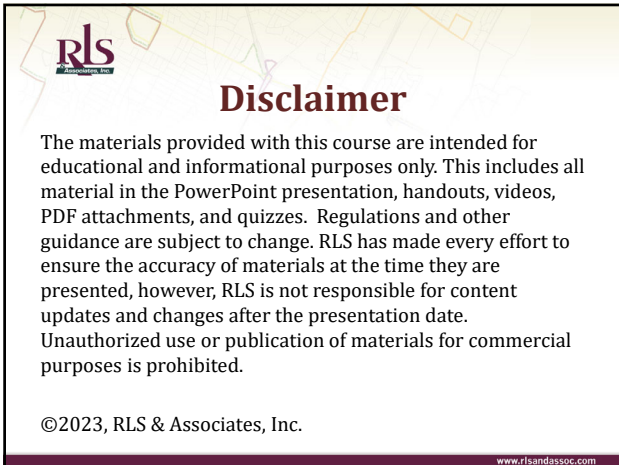
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Moving Public Transportation
Into the Future

Title VI Plan Update

Bethany Renner
May 18, 2023

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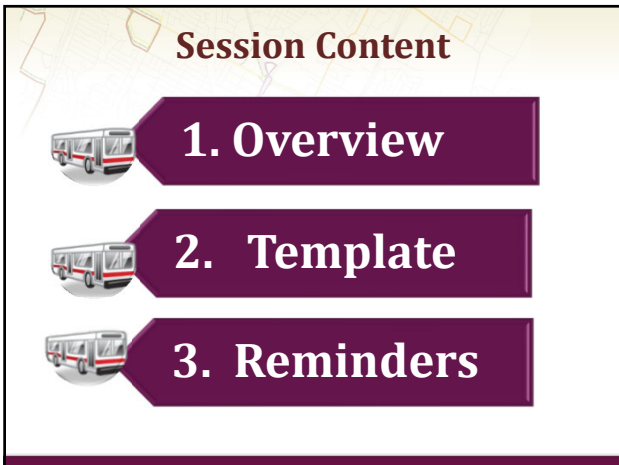
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Session Content

-  **1. Overview**
-  **2. Template**
-  **3. Reminders**

Section 1

OVERVIEW



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:**
 - Update your policy and
 - Email Bethany at brenner@rlsandassoc.com to review and provide feedback
- ◆ **June-July 14:**
 - You address comments, finalize Plan
 - 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:**
 - NHDOT will issue Concurrence Letter

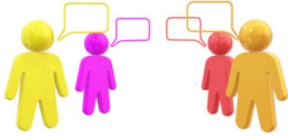
Section 2

TEMPLATE

Template Materials

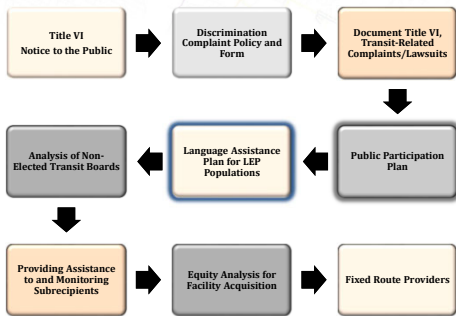
- ◆ Template materials can be found on the NHRTAP website
- ◆ <https://www.newhampshirertap.com/blank-page>
 - Compliance page, Title VI section

Template



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

Title VI Plan Elements



Title VI Plan Elements

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

Title VI Plan Elements

◆ 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

Title VI Plan Elements

◆ 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)

Title VI Plan Elements

- ◆ Language Assistance Plan (LAP)
 - 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)
 - 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

Title VI Plan Elements

- ◆ 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

Title VI Plan Elements

- ◆ Providing Assistance and Monitoring Subrecipients
 - Verify compliance from the subcontractor
 - Ensure the Complaint Process/Form and Title VI Notice to the Public is distributed
 - 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: <ul style="list-style-type: none"> • 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

Section 3

REMINDERS

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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Compliance > Title VI
