

TITLE VI TRANSIT PROVIDER COMPLIANCE REQUIREMENTS: PUBLIC PARTICIPATION, BOARD APPROVAL AND DUE DATES

**Based on FTA Circular 4702.1B (2012) (as corrected),
Notice of Availability of Final Circular (Federal Register Vol. 77,
No. 167, August 28, 2012, p. 52116 et seq.)**

Deliverable	Requires Public Participation?	Requires Board Approval?	Due Date
Posting of Notice of Rights, Complaint Form, Complaint Procedures	No	No	Now
Service standards (pp. IV-4-6, App. G)	Standard local rules for open meetings/public input	Yes	Should be in place prior to decisions on any fare or service changes; no requirement to load onto TEAM separately (as initially provided in Circular), but should be included in Title VI Program submittal. (Circular Correction page IV-1)
Service policies (pp. IV-4, 6-7, App. H)	Standard local rules for open meetings/public input	Yes	Should be in place prior to decisions on any fare or service changes; no requirement to load onto TEAM separately (as initially provided in Circular), but should be included in Title VI Program submittal. (Circular Correction page IV-1)
Disparate Impact Policy (pp. IV-10-21, App. K)	Yes	Yes	Not specified, but circular requires fare and service changes to be evaluated using this policy for all changes beginning 4/1/13
Disproportionate Burden Policy (pp. IV-10-21, App. K)	Yes	Yes	Not specified, but circular requires fare and service changes to be evaluated using this policy for all changes beginning 4/1/13

Deliverable	Requires Public Participation?	Requires Board Approval?	Due Date
Major Service Change Policy (pp. IV-10-21, App. K)	Yes	Yes	Not specified, but circular requires major service changes to be identified and evaluated for all changes beginning 4/1/13
Equity analysis related to location of new facility (vehicle storage facility, maintenance facility, operation center, etc.) (pp. III-11-12)	Yes	Likely to be included in environmental analysis, related approvals	To be done during planning stage
Major Service Change Equity Analyses (pp. IV-12-18, App. K)	If disparate impact or disproportionate burden identified: Yes, must engage in public participation on mitigation measures, less discriminatory alternatives; otherwise standard local rules for open meetings/public input	Yes	Standard: analysis complete in time for Board consideration of change If New Starts, Small Starts, or Fixed Guideway system: 6 months prior to launch of operations
Fare Change Equity Analyses (pp. IV-19-21, App. K)	If disparate impact or disproportionate burden identified: Yes, must engage in public participation on mitigation measures, less discriminatory alternatives; otherwise standard local rules for open meetings/public input	Yes	Standard: analysis complete in time for Board consideration of change If New Starts, Small Starts, or Fixed Guideway system: 6 months prior to launch of operations

Deliverable	Requires Public Participation?	Requires Board Approval?	Due Date
Service monitoring based on Service Standards and Policies	Standard local rules for open meetings/public input	Yes ; Board to confer on any needed adjustments if monitoring reveals problems	In time for Board input prior to submittal of Title VI Program; every 3 years
Demographic ridership and travel patterns, collected by surveys (pp. IV-8-9, App. I)	Standard local rules for open meetings/public input during presentation of Title VI Program	As part of Title VI Program	Within 5 years of last survey (and every 5 years thereafter); If no survey completed within last five years, first survey must be completed by 12/31/2013
Title VI Program	Standard local rules for open meetings/public input	Yes	60 days prior to expiration date of current program
List of transit-related Title VI investigations, complaints, and lawsuits	As part of T VI Program	As part of T VI Program	For inclusion in Title VI Program
Public Participation Plan, summary of outreach efforts (pp. III-5-6, EJ Circular)	As part of T VI Program	As part of T VI Program	For inclusion in Title VI Program (sooner is better)
LEP Language Assistance Plan (pp. III-6-9, App. M)	As part of T VI Program	As part of T VI Program	For inclusion in Title VI Program (sooner is better)
Table of agency-selected membership of non-elected committees and councils, measures taken to encourage participation of minorities (p. III-9, App. F)	As part of T VI Program	As part of T VI Program	For inclusion in Title VI Program (sooner is better)
Subrecipient monitoring plan, schedule, implementation (pp. III-10-12, App. L)	As part of T VI Program	As part of T VI Program	Monitoring results complete in time for inclusion in Title VI Program (plan and schedule sooner)
Demographic and service profile maps and charts (pp. IV-7-8, App. I)	As part of T VI Program	As part of T VI Program	For inclusion in Title VI Program

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