

An On-the-Ground Look at Transit Agency Title VI Compliance

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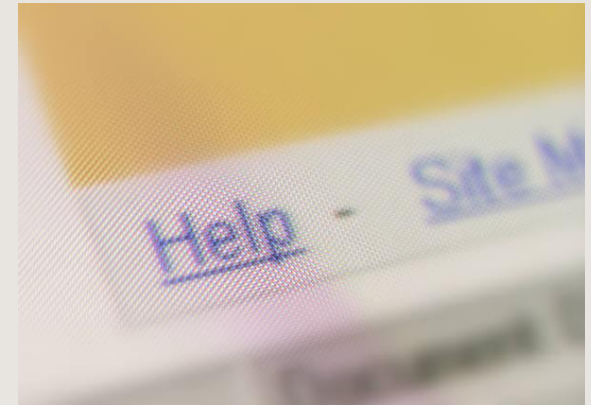


Now what??

- Step 1: Educate staff
- Step 2: Take stock
- Step 3: Make a plan
- Step 4: Pick low-hanging fruit
- Step 5: Adopt/update System-Wide Service Standards & Policies
- Step 6: Dig In

→ *Educate the Board*

→ *Assume some overlap*



Getting organized

- Step 1: Educate staff
 - Meet with Operations, Marketing, Planning, Civil Rights, Executive, Grants to discuss context, walk through Circular
 - Provide annotated version of Appendix A if not using full circular
 - See handout on Public/Board participation and deadlines
 - Provide information on FTA, other resources (Intranet, binder for key staff)
- Step 2: Take Stock
 - What are we doing now?
 - What needs updating versus creating?
- Step 3: Make a Plan
 - Identify compliance manager
 - Set priorities and deadlines, make assignments



First steps

- Step 4: Pick low-hanging fruit
 - e.g., post Notice of Rights and Complaint Form on web and in public areas; move forward with budgeted passenger survey
- Step 5: System-Wide Service Standards and Policies
 - Review existing standards/policies (e.g., prior Title VI program, SRTP)
 - Make policies meaningful, helpful for setting service improvement priorities
 - Seek Board action
 - Deadline issue (3/31/2013)



Dig In

- Notice on vehicles/at facilities
 - Short form option?
 - Where?
 - How much translation?
- Major Service Change, DI and DB Policies
 - Public participation, Board approval required!
 - May need to postpone imminent consideration of fare or service changes
 - Attracts senior level attention on issue



Dig In

- Subrecipient monitoring
 - Applicable?
 - Desirable (on both sides) to maintain relationships?
 - How much technical assistance?
 - Need to amend existing agreements?
 - Who should monitor?
- Complaints and Investigations
 - Test your data source
 - Run key term searches
 - Discuss real-life implementation with staff
 - Who should do investigations?
 - Different for staff versus contractor-operated?
 - Public officer protections?



Beware!



- Lack of leadership can be paralyzing
- Best to agree on role of Counsel
 - Extent of involvement depends on staff resources, structure
 - Need staff to include counsel at outset of fare/service change discussions, policy-making, etc.
- Concerns about cost
 - May not need everything to be gold-plated
 - Think about agency's size, community resources, overall budget
- Prepare to battle “These rules aren't meant for us”
 - Compare to handling of accessibility issues
 - California: State discrimination statutes, private right of action with \$\$ penalties
 - Majority-minority area?: rules still apply
 - Non-minority area?: rules still apply



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