TITLE VI PLAN

Introduction of COG's Updated Template

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Metropolitan Washington
Council of Governments

Welcome & Instructions

- Staff introductions

- Webinar instructions

Agenda

- Overview

- Why template changed

- Differences

- Walk through document

  - Four Factor Analysis Example

- Timeline for submission

Q & A

Title VI

FTA Circular C 4702.1B: Title VI Requirements and Guidelines for Federal Transit Administration Recipients - www.fta.dot.gov/documents/FTA_Title_VI_FINAL.pdf

- A Federal statute that says "no person shall, on the grounds 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."

- Prohibits recipients of Federal funds (e.g., grantees as subrecipients of COG) from discriminating on the basis of race, color, or national origin in their programs or activities

- FTA has to provide oversight of recipients (therefore COG of subrecipients), and their compliance with Title VI, to ensure that FTA funds are not being used to subsidize discrimination

  - Triennial Reviews

  - Site visits

Subrecipient Title VI Requirements

- Program – with all applicable components (at award and triennially thereafter)

- Complaint Status Report (as part of Program, and now with quarterly report)

- Template is a guide. Finalized documents needs to reflect your agency, not just be copied verbatim

- Resubmit - by end of 2017

New Template

Why the change?

- Missing requirements were deemed necessary

- Site visits determined that many agencies had the document but weren't doing what it said they were doing

Document should reflect what an agency actually is doing or plans on actually doing with regard to compliance.

Don't include it if you can't or won't do it

==Yellow Highlights== = instructions

Red Lettering = Information agency is to provide/sample documents

Table of Contents = all components (some specifically for Transit Providers only)

Differences

Old	New
Introduction	Introduction
	Overview of Services
Policy Statement & Authorities	Policy Statement & Authorities
Nondiscrimination Assurances	Nondiscrimination Assurances
	Plan Approval Document
	Organization & Title VI Program Responsibilities
	Notice to Public
Complaint Form & Procedures	Complaint Procedures
	Complaint Form
	Complaint Status Report
	Public Outreach & Involvement Activities
	Access for Limited English Proficient Persons
	Representation on Planning & Advisory Boards
	Requirements of Transit Providers
Complaint Status Report Language Assistance Plan	Appendices

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Template Walk through

Please refer to the template that was provided during this portion of the webinar

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Four Factor Analysis

Factor 1: Assessment of the Number and Proportion of LEP Persons Likely to be Served or Encountered in the Eligible Service Population

- **Step 1:** Define service area

- **Step 2:** Review census data (or other available data) to identify the different languages spoken in your service area by percentages.

- **Step 3**: Analyze data to determine if any language spoken in your service area comprise more than 5% of the population

- If Yes then you must move on to Factors 2-4

Four Factor Analysis

Factor 2: Assessment of Frequency LEP Individuals Come into Contact with the Transit Services or System (only if Factor 1 identifies any languages that meet the threshold)

Research the amount and type of contact you have had with the persons identified. Do they come into contact with your agency through:

- Vehicle operators

- Customer service representatives (phone line)

- In-person

- Website

- Meetings hosted by the agency

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Four Factor Analysis

Factor 3: Assessment of the Nature and Importance of the Transit Services to the LEP Population (only if Factor 1 identifies any languages that meet the threshold)

What services are of most importance to the persons identified? This can be determined through:

- Past experience

- Asking community agencies serving the persons identified

- Surveys

- Interviews/focus groups

Consider:

- Safety and Security instructions

- Eligibility determination

- Reduced fare application process

Four Factor Analysis

Factor 4: Assessment of the Resources Available to the Agency and Costs (only if Factor 1 identifies any languages that meet the threshold)

What resources are being made available to meet the needs and concerns of the persons identified? (based on factors 1-3).

- **Step 1:** Define service area

- **Step 2:** Review census data (or other available data) to identify the different languages spoken in your service area by percentages.

- **Step 3**: Analyze data to determine if any language spoken in your service area comprise more than 5% of the population

- If Yes then you must move on to Factors 2-4

Four Factor Analysis

RESULT of the Four Factor Analysis:

- LEP Implementation Plan based on the analysis

Demonstration:

[Languages in Prince William County, Virginia (County)](#)

[MontgomeryCountyMD.GOV - Limited English Proficiency (LEP)](#)

[languages spoken in Prince William County - google search](#)

[US Census Website - Prince William County, Virginia](#)

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Continuation of Template Walk through

Please refer to the template that was provided during this portion of the webinar

Next Steps

- Begin filling out template

- Submit document to Lynn Winchell-Mendy to confirm all components are covered

- Seek agency Board approval if necessary

- File a finalized version by 12/29/17

Q&A

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