

Title VI Summary

Citizen's Advisory Committee Meeting

July 17 2012

Civil Rights Act of 1964

- Landmark legislation signed into law by President Lyndon Johnson on July 2, 1964 intended to prohibit major forms of **discrimination** which included racial segregation.
- Eleven “Titles” (public laws) which prohibit discrimination, including:

Title I unequal application practices of voter registration requirements

Title IV desegregation in public school system

Title VII non-discrimination employment practices

Title VI

- **What is Title VI of the Civil Rights Act of 1964?**

“No person in the United States 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**.”

Title VI – What does it mean?

- OCTA is the recipient of **federal financial assistance** and as the provider of public transportation to the citizen's of Orange County, is Federally mandated by the Federal Transit Administration (FTA) to comply with Title VI guidelines and instructions to ensure all OCTA programs, services, and activities are integrated in a **non discriminatory** manner without regard to race, color, or national origin.

Regulatory Framework

- Three Key Documents:
 - **Federal Transit Administration Circular 4702.1A**
 - Seeks to reinforce the Civil Rights Act, two Executive Orders, and Department of Transportation guidance;
 - In September 2011, the FTA published proposed Circular 4702.1B ;
 - **Executive Order 12898** (signed into law by President William Clinton)
 - Seeks to address and identify actions taken by transit agencies that could have a disproportionately high and/or adverse effect on human health or an environmental effect on minority and low-income populations;
 - **Executive Order 13166** (signed into law by President William Clinton)
 - Agencies receiving Federal funding assistance must provide meaningful access to information regarding their services, programs, and activities.

Proposed FTA Title VI Circular

- Proposed FTA Title VI Circular 4702.1B
 - New Title VI guidance and regulations:
 - Collection of demographic information;
 - Updates to existing policies;
 - Clear and transparency measures;
 - Development of monitoring programs;
 - Development of Equity Analysis
 - Evaluate impact of changes on minorities and low-income

Title VI Plan Triennial Report

- The Title VI Plan document is submitted to the FTA Region XI office once every three years. The Plan must include all of the components stated in the various regulatory framework documents.
- The Title VI Plan document must demonstrate that OCTA has implemented all of its services, programs, and activities in a non-discriminatory manner without regard to race, color, and national origin.

Title VI Plan Triennial Report

General Requirements

Current Circular 4702.1A

- Complaint Procedure & Form
- List of Complaints, & Investigations
- Limited English Proficiency Plan
- Notification of Title VI Rights
- Public Involvement Plan

Proposed Circular 4702.1B

- Complaint Procedure & Form
- List of Complaints & Investigations
- Limited English Proficiency Plan
- Notification of Title VI Rights
- Public Involvement Plan
- Minority Representation of Decision-Making Boards/Committees**
 - Summary of Assistance to Sub-Recipients
 - Sub-Recipient Monitoring Plan
 - Resolution of Board review and approval of Title VI Plan

Title VI Plan Triennial Report

Requirements for Transit Providers

- System-wide Service Standards & Policies
- Collect & Report Demographic Data
- Service Monitoring Program Overview
- Method for Evaluating Service & Fare Changes

Consequences for Non-Compliance

- Federal funding can be cut or significantly reduce as a result of not complying with all Title VI requirements.

Contacts

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Questions?