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**Regional Transit**  
Title VI Program Update

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May 11, 2020

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# 1 Introduction

## 1.1 *SacRT Profile*

The Sacramento Regional Transit District (SacRT) began operation on April 1, 1973, with the acquisition of the Sacramento Transit Authority. In 1971, California legislation allocated sales tax money for local and statewide transit service, and created the organizational framework for SacRT pursuant to the Sacramento Regional Transit District Act.

An 11-member Board of Directors is responsible for governing SacRT. The Board is comprised of four members of the Sacramento City Council, three members of the Sacramento County Board of Supervisors, one member of the Rancho Cordova City Council, one member of the Citrus Heights City Council, one member of the Folsom City Council and one member of the Elk Grove City Council. The Board is responsible, among other things, for approving contracts, planning service and capital projects, passing ordinances, adopting the budget, appointing committees and hiring both SacRT's General Manager/Chief Executive Officer (GM/CEO) and Chief Counsel. SacRT's GM/CEO is responsible for carrying out the policies and ordinances of the Board, for overseeing SacRT's day-to-day operations, and for appointing the executive management of the various divisions.

SacRT provides bus and light rail service 365 days a year. Annual ridership has steadily increased on both the bus and light rail systems from 14 million passengers in 1987, when light rail operations began, to 21 million passengers in the fiscal year ended June 30, 2019. SacRT's entire bus and light rail system is accessible to the disabled community. Additionally, through a contract with Paratransit, Inc., SacRT provides origin-to-destination transportation service (in accordance with the Americans with Disabilities Act of 1990) for people that are unable to use fixed-route service.

## 1.2 *Requirements and Guidance*

As a condition of SacRT's grant agreement with the Federal Transit Administration (FTA) and SacRT's annual certifications and assurances made to the FTA, SacRT is required to submit evidence to the FTA on a triennial basis documenting SacRT's compliance with requirements set forth in FTA Circular 4702.1B on Title VI of the Civil Rights Act of 1964, which states, in Section 601:

*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.*

There are two Presidential Executive Orders that place further emphasis upon the Title VI protections of race and national origin.

Executive Order #12898 ("*Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*") directs federal agencies to develop strategies to

address disproportionately high and adverse human health or environmental effects of their programs on minority and low-income populations.

Executive Order # 13166 (“*Improving Access To Services For Persons With Limited English Proficiency*”) directs federal agencies to evaluate services provided and implement a system that ensures that persons with Limited English Proficiency are able to meaningfully access the services provided consistent with and without unduly burdening the fundamental mission of each federal agency. Additionally, each federal agency shall ensure that recipients of federal financial assistance provide meaningful access to their Limited-English-Proficiency applicants and beneficiaries.

Circular 4703.1 went into effect on August 15, 2012 to provide recipients of FTA financial assistance with guidance to incorporate environmental justice principles into plans, projects, and activities that receive funding from FTA.

Circular 4702.1B went into effect on October 1, 2012 to assist grantees in complying with Title VI of the Civil Rights Act of 1964. The purpose of this Circular is to provide recipients of FTA financial assistance with instructions and guidance necessary to carry out the U.S. Department of Transportation’s Title VI regulations (49 CFR part 21).

### 1.3 Checklist of Requirements

SacRT is required to submit the following information to FTA as part of the Title VI Program. SacRT subrecipients shall submit the information below to SacRT on a schedule to be determined by SacRT.

- Title VI Notice to the Public
- Title VI Complaint Procedure
- Title VI Complaint Form
- List of Transit-Related Title VI Investigations, complaints, and lawsuits
- Public Participation Plan
- Language Assistance Plan
- Table of Non-Elected Committees and Councils
- Subrecipient Monitoring
- Title VI Equity Analyses (Facilities, Service, and/or Fare)
- Board Resolution – Approving Title VI Program
- Service Standards
- Service Policies
- Demographic and Service Profile Maps/Charts
- Demographic Ridership & Travel Patterns (collected by surveys)
- Service Monitoring (including Board Approval)

## 2 General Requirements

### 2.1 Notice to the Public

*Requirement:* All recipients must provide a copy of the recipient's Title VI notice to the public that indicates the recipient complies with Title VI, and informing members of the public of the protections against discrimination afforded to them by Title VI, as well as a list of locations where the notice is posted.

*Response:* SacRT publicizes its Title VI notice in all buses and trains and online at [www.sacrt.com](http://www.sacrt.com). A copy of the Title VI notice has been provided in Appendix A. The notices are translated as outlined in the Language Assistance Plan in Appendix D.

### 2.2 Complaint Procedures and Form

*Requirement:* All recipients must provide a copy of instructions to the public regarding how to file a Title VI discrimination complaint, including a copy of the complaint form.

*Response:* A procedure for filing a formal Title VI discrimination complaint can be found online at [www.sacrt.com/aboutrt/rttitlevi.aspx](http://www.sacrt.com/aboutrt/rttitlevi.aspx) and may also be obtained by contacting SacRT's Customer Advocacy Department. All complaints of a Title VI nature made through SacRT's ordinary complaints process (through SacRT's Customer Advocacy Department by phone, mail, email, or web form) are also flagged as Title VI complaints.

Once a complaint is submitted, SacRT will acknowledge receipt of the complaint within seven days. A final, written determination of the outcome of the complaint will occur no later than 30 working days of receipt. If the complaint is not substantiated, the complainant is also advised of his or her right to appeal.

The complaint form and procedure are included in Appendix A. The complaint form and procedure are translated as outlined in the Language Assistance Plan in Appendix D.

### 2.3 Investigations, Complaints, and Lawsuits

*Requirement:* All recipients must provide a list of any public transportation-related Title VI investigations, complaints, or lawsuits filed with the recipient since the time of the last submission.

*Response:* SacRT flags any complaints made to SacRT's Customer Advocacy Department that may be related to Title VI, regardless of whether or not the complainant mentioned Title VI. At the time of preparation of this report, SacRT reviewed complaints filed during the past three-year period (2017 – 2020) and identified seven (7) Title VI-related complaints. All complaints were investigated and closed, as shown in Appendix B. No Title VI lawsuits were filed during the same period.

## ***2.4 Public Participation Plan***

*Requirement:* All recipients must provide a Public Participation Plan that includes an outreach strategy for public engagement, such as a description of activities requiring outreach, methods of communication, strategies for in-person engagement, and identification of fully-accessible venues, as well as a summary of outreach efforts made since the last Title VI program submission.

*Response:* SacRT's Public Participation Plan (PPP) has been included as Appendix C.

## ***2.5 Language Assistance Plan***

*Requirement:* All recipients are required to provide a Language Assistance Plan, which specifies policies and procedures for providing language assistance to Limited English Proficiency (LEP) populations, in accordance with U.S. Department of Transportation LEP Guidance.

*Response:* SacRT's Language Assistance Plan (LAP) has been included as Appendix D.

## ***2.6 Committee and Council Composition***

*Requirement:* Recipients that have transit-related, non-elected planning boards, advisory councils or committees, or similar bodies, the membership of which is selected by the recipient, must provide a table depicting the racial breakdown of the membership of those committees and a description of efforts made to encourage the participation of minorities on such committees or councils.

*Response:* SacRT has one applicable body, the Mobility Advisory Council (MAC), which was established in 2005. The MAC is made up of seventeen members. Nine seats are designated for affiliates or representatives of agencies or organizations providing services or advocacy for persons with disabilities and/or older adults; these members are nominated to MAC by the designated agency or organization and confirmed by the SacRT General Manager/CEO. Eight seats are designated for at-large members, of which four are designated for representatives of older adults and four are designated for representatives of persons with disabilities; these members are selected by an interview panel and confirmed by the SacRT GM/CEO.

## Advisory Body Composition

*Table 1. Mobility Advisory Committee Composition*

	White/ Caucasian	Hispanic/ Latino	Black/African American	Asian American/ Pacific Islander	Native American/ Alaska Native
SacRT's Service Area	48.9%	21.7%	10.2%	13.3%	0.6%
MAC Members	100%	0%	0%	0%	0%

As of the preparation of this report, there were three at-large vacancies and five organizational vacancies on the MAC. It has proved challenging in general to recruit viable members. SacRT does its best to ensure a diverse MAC, reflecting representation between seniors and those with varying types of disabilities, as well as minority representation. The MAC's 2020 Work Plan makes this recruitment effort a priority, and interest has been cultivated recently with several agencies and individuals to assist the MAC with this goal.

### 2.7 Subrecipient Monitoring

*Requirement:* Primary recipients shall include a description of how the agency monitors its subrecipients for compliance with Title VI, and a schedule of subrecipient Title VI Program submissions. When a subrecipient is also a direct recipient of FTA funds, then that entity reports directly to FTA and the primary recipient is not responsible for monitoring compliance of that subrecipient.

*Response:* SacRT passes through federal funds from FTA to 11 subrecipient agencies, five of which are also direct FTA recipients and therefore report federal compliance activities directly to FTA. In accordance with SacRT's annual certifications and assurances, SacRT monitors subrecipient compliance with applicable federal rules and regulations, including Title VI for all non-direct FTA recipients.

Subrecipient Title VI program status is as follows:

*Table 2. Subrecipient Monitoring Status*

Agency	Status	Comments
City of Sacramento	Expired	Expired 2019; awaiting submittal
City of Folsom	Pending	Expires 2020; awaiting submittal
City of Citrus Heights	Pending	Expires 2020; awaiting submittal
City of Placerville	Approved	Expires 2021
Paratransit, Inc.	Approved	Expires 2021
El Dorado Transit	Approved	Expires 2023

In order to ensure that SacRT and its subrecipients are in compliance with the Title VI requirements, SacRT has developed a Subrecipient Monitoring Plan to manage and direct proper monitoring efforts. The monitoring plan contains elements including, but not limited to:

- Monitoring Frequency and Type
- Documentation and Analysis
- Periodic Monitoring (Audits)
- Reporting Structure
- Templates and Checklists
- Tracking Records

## ***2.8 Construction Projects***

*Requirement:* If the recipient has chosen the location for a facility, such as a vehicle storage facility, maintenance facility, operation center, etc., the recipient shall include a copy of the Title VI equity analysis conducted during the planning stage with regard to the location of the facility.

*Response:* There have been no construction projects requiring a Title VI equity analysis during the three-year period of this analysis (2017 – 2020).

## ***2.9 Board Approval***

*Requirement:* A copy of board meeting minutes, resolution, or other appropriate documentation showing the Board of Directors reviewed and approved the Title VI program must be included.

*Response:* This Title VI Program update document will be made available for 30-day public review on April 1, 2020 and will be presented to the SacRT Board of Directors for review and approval on May 11, 2020. A copy of the resolution approving this document will be furnished to FTA, as required.

# **3 Requirements of Transit Providers**

The requirements in this section apply only to providers of fixed-route public transportation. FTA exempts small agencies from many of the transit-specific requirements; because SacRT operates 50 or more fixed-route vehicles in peak service and in an Urbanized Zone Area (UZA) of 200,000 or more in population, SacRT is subject to the full set of requirements in FTA Circular 4702.1B, Chapter IV, as follows.

## ***3.1 System-wide Service Standards and Service Policies***

*Requirement:* All fixed-route providers must submit system-wide service standards and system-wide service policies. FTA requires quantitative standards for all fixed-route modes of operation for each of six categories: (1) passenger loading, (2) vehicle headways, (3) on-time performance, (4) service availability, i.e., coverage, (5) vehicle assignment, and (6) stop/station amenities.

*Response:* SacRT's Service Standards were adopted by the SacRT Board on August 26, 2013, as Resolution 13-08-0124 after an extended public review process that began in February 2013. A complete copy of these Service Standards has been provided as Appendix I.

### **3.2 Demographic Maps and Charts**

*Requirement:* Transit providers that operate 50 or more fixed-route vehicles in peak service and are located in an UZA of 200,000 or more in population shall include a demographic analysis of the transit provider's service area. This shall include demographic maps and charts completed since submission of the last Title VI program that contains demographic information and service profiles.

*Response:* Demographic maps and charts meeting FTA specifications were incorporated into SacRT's Service Monitoring Report, found in Appendix G.

### **3.3 Demographic Ridership Data**

*Requirement:* Transit providers that operate 50 or more fixed-route vehicles in peak service and are located in an UZA of 200,000 or more in population shall include data regarding customer demographics and travel patterns collected from passenger surveys.

*Response:* In Winter 2020, SacRT began surveying its customers in order to provide the required information for the Title VI Program Update, as well as other planning and analysis processes which require rider information. The outbreak of coronavirus, also known as COVID-19, interrupted that process, and on-board surveys had to be delayed. Appendix F is included in this Title VI Program as a placeholder for the results. They will be submitted to FTA as an amendment once the surveying and analysis is completed.

### **3.4 Service Monitoring Report**

*Requirement:* Transit providers that operate 50 or more fixed-route vehicles in peak service and are located in an UZA of 200,000 or more in population shall include results of their program to monitor the performance of their transit system relative to their system-wide service standards and service policies not less than every three years, including evidence that the Board was aware of the results and approved the analysis.

*Response:* A Title VI Service Monitoring report, prepared in accordance with FTA Circular 4702.1B, is included in this report as Appendix G for review and approval by the SacRT Board.

### **3.5 Major Service Change Policy**

*Requirement:* Transit providers that operate 50 or more fixed-route vehicles in peak service and are located in an UZA of 200,000 or more in population shall include a description of the public engagement process for setting the major service change policy, disparate impact policy, and disproportionate burden policy, as well as a copy of Board meeting minutes or a resolution demonstrating the Board's consideration, awareness, and approval of the major service change policy and disparate impact policy.

*Response:* SacRT's Service and Fare Change Policies were revised and restated in 2013 to bring SacRT into full compliance with the guidance set forth in FTA Circular 4702.1B. SacRT's Service and Fare Change Policies were developed in conjunction with SacRT's Service Standards, so that public engagement efforts could be combined.

In 2015, SacRT updated and restated its Fare Change Policy as a standalone document, and, accordingly, restated its Service Change Policy as a standalone document; however, there were no changes to SacRT's Major Service Change, Disparate Impact, or Disproportionate Burden definitions, and there have been no changes since the last Title VI Program.

The Service Change Policy, which includes the Major Service Change, Disparate Impact, and Disproportionate Burden Policies, is found in Appendix J, and the Fare Change Policy is in Appendix K.

### 3.6 Service and Fare Equity Analyses

*Requirements:* Transit providers that operate 50 or more fixed-route vehicles in peak service and are located in an UZA of 200,000 or more in population shall include results of equity analyses for any major service changes and/or fare changes implemented since the last Title VI Program submission, as well as a copy of Board meeting minutes or a resolution demonstrating the Board's consideration, awareness, and approval of the equity analysis for any service or fare changes.

*Response:* Since SacRT's last Title VI program update, SacRT has undertaken seven equity analyses (see Appendix H):

*Table 3. Service and Fare Equity Analyses*

Project	Analysis Type
Title VI Fare Equity Analysis (November 2017)	Fare
Student Pass Fare Equity Analysis (June 2018)	Fare
SacRT Forward Service Equity Analysis (February 2019)	Service
Title VI Fare Equity Analysis (February 2019)	Fare
Title VI Fare Equity Analysis Student Pass Program (July 2019)	Fare
Title VI Service and Fare Equity Analysis for Causeway Connection (October 2019)	Fare/Service
Title VI Service Change Equity Analysis for April 2020 Service Changes (November 2019)	Service