SUBJECT: Approval of Staff Report & Resolution 23-07 to adopt a Title VI Program for the Inglewood Transit Connector Project

ACTION: Approve Recommendations

RECOMMENDATION

1. Approve the staff report and resolution to establish a Title VI Program for the Inglewood Transit Connector Project.
2. Delegate authority to the Chief Executive Officer, subject to approval as to form by Counsel, to make any minor, non-material revisions not impacting the substantive terms, conditions or intent of the Title VI Program.

BACKGROUND

The City of Inglewood (City) and the Los Angeles Metropolitan Transportation Authority (LA Metro) have entered into a Joint Powers Agreement (JPA) forming a single purpose governmental entity tasked with owning, managing, and overseeing the design, construction, financing, operation, and maintenance of the Inglewood Transit Connector (ITC) Project.

As an intended recipient of Federal financial assistance from the U.S. Department of Transportation (DOT) and as a condition of receiving such assistance, the JPA staff has developed a Title VI Program (Program) to comply with Title VI of the Civil Rights Act of 1964, including provisions set forth in the DOT’s FTA Circular 4702.1B “Title VI Requirements and Guidelines for Federal Transit Administration Recipients,” and Presidential Executive Order 13166—Improving Access to Services for Persons with Limited English Proficiency (LEP).

The JPA is firmly committed to its Title VI Program objectives, which are designed to ensure:
• Services are provided in a non-discriminatory, safe, reliable and equitable manner;
• Practices and methods of delivery prohibit discrimination on the basis of race, color or national origin;
• Meaningful access to transit-related programs and activities by persons with limited English proficiency; and
• The public is well-informed of its protections and rights under Title VI.

The JPA is committed to ensuring that full and fair participation will be afforded to all those that reside, work, travel and participate in the JPA’s contracts and procurement processes, related programs and services associated with the ITC.

The Program (Attachment 2) encompasses the policies, procedures, and requirements that will govern the JPA’s oversight and administration of the Program.

The Title VI Program Includes:

• **Introduction** with an overview of purpose, applicability, policies and objectives;
• **General Requirements and Guidelines** such as Notice to Public, Non-Discrimination Complaint Procedures and Complaint Form, Public Participation Plan, Limited English Proficiency and Language Access Plans, and a Major Service Change Policy;
• **Requirements for Fixed Route Transit Service Providers** such as system-wide service standards and policies, monitoring of transit service, and data collection and reporting;
• **Board of Directors Resolution Approving the Adoption of the Title VI Program**; and
• **Appendices** with relevant documents, including the JPA Non-Discrimination Policy in English and Spanish, as well as sample Non-Discrimination Complaint Procedure and Complaint Forms in English and Spanish, a Public Participation Engagement Survey, and a Limited English Proficiency (LEP) Report Form.

Within the Program, standard Title VI assurances include the ITC’s Non-Discrimination Policy Statement, Service Standards, Major Service Change Policy (including Disparate Impact Policy, Disproportionate Burden Policy), and an Annual Statement of Assurance and Certification of Nondiscrimination.

Other policies, processes, and analyses in the Program include:

• Staffing and Interim Title VI Officer;
• Staff training requirements for front-line, supervisors, and leadership;
• Process for collecting, analyzing and reporting data;
• Complaint procedures and complaint forms in English and Spanish;
• Community outreach and public notification procedures;
• Program compliance and enforcement procedures; and
• Identification of LEP populations and 4-factor analysis and application of the analysis

**Next Steps**

If approved by the JPA Board, staff will finalize the program documents, approved as to form by legal counsel, and formally submit to the FTA.

The JPA will continue to consult with the public regarding input they have on the Program and include relevant Program language and assurances in contract documents and agreements.
ATTACHMENTS

- **Attachment 1:** Resolution of the Board of Directors of the ITC JPA Approving the ITC Title VI Program
- **Attachment 2:** Title VI Program for the Inglewood Transit Connector Project