

# Civil Rights Corrective Action Plan

December 2011

Civil Rights Programs Compliance



**Metro**

# Background

- **FTA conducted review of Metro's compliance with Title VI Civil Rights regulations and guidance**
- **Purpose of the review was also to provide assistance to Metro in understanding requirements**
- **It was not an investigation of civil rights violations**
- **Findings were similar to those at other agencies**

# Title VI of Civil Rights Act

- **Civil Rights Act protects against discrimination based on: race, color, and national origin**
- **Title VI protects against disparate impact of transit service and fare decisions**
- **Disparate impact is discrimination resulting from policy that is racially neutral**
  - **Unintentional discrimination**

# The Issue

- **FTA Compliance Review found deficiencies in 5 of 12 areas:**
  - **Notice to Beneficiaries**
  - **Limited English Proficiency**
  - **Service Standards & Policies**
  - **Service & Fare Equity**
  - **Service Monitoring**
- **To comply we need to improve policies and procedures, not change service or fares**



**Metro**

# Notice to Beneficiaries

- **What is requirement?**
  - Post notices to public about their rights under Title VI
- **What deficiencies were identified?**
  - Notice must identify process to file complaints
  - Notice must be in alternative languages
- **When will it be rectified?**
  - New notice has been designed and will soon be posted

# Notice to Beneficiaries

- Temporary notice until December 2012 when final language requirements are finalized
- Where?
  - Vehicles, Stations



## Metro Notice of Civil Rights

Los Angeles County Metropolitan Transportation Authority (Metro) operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. In addition to Title VI, Metro also prohibits discrimination based on sex, age or disability. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice may file a complaint with Metro.

For more information on Metro's civil rights program, and the procedures to file a complaint:

- 213.922.4845
- California Relay 711
- [CustomerRelations@metro.net](mailto:CustomerRelations@metro.net)
- [metro.net/civilrights](http://metro.net/civilrights)
- Customer Relations Office  
One Gateway Plaza, PL-99-4  
Los Angeles, CA 90012-2952

To request information about civil rights in another language, contact 213.922.4845.

Քաղաքացիական իրավունքները մասին հայերեն լեզվով (Armenian) տեղեկություններ ստանալու համար զանգահարեք 213.922.4845 հեռախոսահամարով:

ដើម្បីស្នើសុំព័ត៌មាន អំពីសិទ្ធិស៊ីវិលជាភាសាខ្មែរ (Cambodian) សម្រាប់ព័ត៌មាន 213.922.4845 ។

若要取得關於公民權利的中文 (Chinese) 資訊，請聯絡 213.922.4845。

市民権について、日本語での (Japanese) 情報をお望みの方は213.922.4845へお電話ください。

민권에 관한 정보를 한국어 (Korean)로 신청하시려면, 213.922.4845으로 전화하시기 바랍니다.

Для получения информации о гражданских правах на русском языке (Russian), позвоните по телефону 213.922.4845.

Para solicitar información sobre los derechos civiles en español (Spanish), llame al 213.922.4845.

Upang humiling ng impormasyon tungkol sa mga karapatang sibil sa Tagalog (Tagalog), tumawag sa 213.922.4845.

หากต้องการข้อมูลเกี่ยวกับสิทธิมนุษยชนเป็นภาษาไทย (Thai) กรุณาติดต่อ 213.922.4845

Để yêu cầu cung cấp thông tin về dân quyền bằng tiếng Việt (Vietnamese), vui lòng liên lạc 213.922.4845.



C55976

Effective Date 12/11

# Limited English Proficiency

- **What is requirement?**
  - To provide language assistance to those who cannot speak English
- **What are the deficiencies?**
  - Need to prepare 4 Factor Analysis
  - Need to prepare Language Assistance Plan
  - Need to implement and monitor

# Limited English Proficiency

- **When will it be rectified?**
  - **4 Factor Analysis and Language Assistance Plan to be completed by December 2012**
- **Likely Impacts**
  - **More services and communications available in alternative languages**
  - **More use of pictograms on signs**
  - **Staff training**



# Service Standards and Policies

- **What is requirement?**
  - Board approved standards for all modes for five service areas and two policy areas
- **What deficiencies?**
  - Existing standards didn't apply to all modes and in some areas (e.g. amenities) there were no standards
  - No policy on vehicle assignment or security

# Service Standards and Policies

- **When will it be rectified?**
  - **Action today to create service standards and vehicle assignment policy**
  - **Security policy to codify existing practice in January**

# Service and Fare Equity

- **What are requirements?**
  - Board approved definition of major service change
  - Conduct analysis of major service changes and all fare changes
- **What were service change deficiencies?**
  - No major service change policy for Title VI
  - For 2011 service changes analysis methodology incomplete and Board did not make necessary findings

# Service and Fare Equity

- **Why were Dec 11 service changes suspended?**
  - Some changes met threshold for major service change and require an equity analysis to be done
- **What were fare change deficiencies?**
  - Analysis done 2007 does not match actual changes implemented in 2010
  - Analysis not done for more recent changes including day pass and Silver Line

# Service and Fare Equity

- **When will it be rectified?**
  - **Developing new major service change definition with public input for Board action in February**
  - **December major changes will have equity analysis ready for February Board**
  - **Revised service equity analyses for March Board meeting**
  - **Revised fare equity analyses for April Board meeting**

# Service Monitoring

- **What is requirement?**
  - To compare service in minority and non-minority areas
- **What is deficiency?**
  - Metro chose to use surveys to monitor service and found attitudes were different between minority and non-minority users
  - Metro did not identify means to address differences in attitudes

# Service Monitoring

- **When will it be rectified?**
  - In 2012 a communications campaign will be implemented to help riders to better understand services
  - A new quantitative monitoring program will be introduced by the 2<sup>nd</sup> Quarter of 2012

## Other Actions

- **Strengthen and clarify responsibilities for Civil Rights**
- **Increased training for staff and consultants**
- **Reviewing performance of staff and consultants involved in civil rights work**



# Relationship with FTA

- **Close cooperation**
- **Positive relationship**
- **Work closely with FTA for next 12 months**
  - **Operational planning activities closely monitored and civil rights reports require FTA approval before reaching Board**

# Questions?