

Civil Rights Progress Update

Executive Management Committee

May 17, 2012



Metro

The Issue

- **In July 2011 the FTA conducted a Civil Rights Compliance Review of Metro**
 - **It was not an investigation of a Civil Rights Complaint**
 - **It was a review of compliance with civil rights guidance**

FTA Letter of May 7

- **FTA now confirms that 3 of 5 areas of deficiency have been rectified:**
 - **Notice to Beneficiaries**
 - **Service Standards**
 - **Service Monitoring**
- **FTA approved definition of Major Service Change**
- **FTA confirmed that equity analysis of major guideway projects is not required until ready to open**



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Service Equity Deficiency

- **How minority/low income routes are treated compared to non-minority/non-low income routes**
- **Metro to submit final methodology by May 29**
- **What we are being asked to do is not specifically provided for in the existing guidance**

Cumulative Equity Analysis

- **60 days to complete cumulative service equity analysis after methodology approved by FTA**
 - To include all major service changes from 2009 to 2012
 - Equity analysis will review about 300,000 of 840,000 hours of changes during period
 - If any specific service change created a disparate impact the specific change must be restored or mitigated to eliminate disparity, following public outreach
 - If any specific service changes created a disproportionate high and adverse impact for low income populations some type of mitigation should be provided if possible



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Fare Equity Deficiency

- **How minority/low fares income are treated compared to non-minority/non-low income fares**
- **Methodology submitted to FTA as CAP in December, 2011 and updated February , 2012**
- **FTA to approve or provide comments by May 25th on methodology**
- **Schedule for completion to be provided after comments on methodology are received**

Limited English Proficiency (LEP)

- **Elements of LEP Corrective Action Plan**
 - Approved
- **Factor 1 – Language inventory**
 - Approved
- **Factors 2 & 3 – Frequency & importance of contacts**
 - Draft received from consultant
- **Factor 4 Resources & Vital Documents**
 - Scheduled to be submitted by September 15th

Limited English Proficiency *Continued...*

- **Language Assistance Plan**
 - Scheduled to be submitted by October 15th
 - When completed the Civil Rights Notice & Policy will be republished in appropriate languages – Submit by Oct 31st
- **Implement and monitor**
 - Continuous - Effective upon completion and acceptance of Language Assistance Plan, starting in January 2013

Training

- **Agreed with FTA to defer training until new guidance is published later this year**
- **Current equity analysis is being done under existing guidance**

Questions