



City of Arts & Innovation

City Council Memorandum

TO: HONORABLE MAYOR AND CITY COUNCIL DATE: JULY 20, 2021

FROM: PARKS, RECREATION AND COMMUNITY SERVICES DEPARTMENT WARDS: ALL

SUBJECT: THE 2021-2024 SPECIAL TRANSPORTATION TITLE VI PROGRAM;
REQUIREMENT UNDER THE FEDERAL TRANSIT ADMINISTRATION CIRCULAR
4702.B1

ISSUE:

Approve the 2021-2024 Special Transportation Title VI Program as required under the Federal Transit Administration Circular 4702.B1.

RECOMMENDATIONS:

That the City Council:

1. Approve the Special Transportation Title VI Program as required by the Federal Transit Administration as part of their requirements; and
2. Authorize the City Manager, or his designee, to execute all necessary documents to implement the approval of these documents, including making minor and non-substantive changes.

BACKGROUND/LEGISLATIVE HISTORY:

The Civil Rights Act of 1964 is a landmark piece of civil rights legislation in the United States that outlawed discrimination based on race, color, religion, sex, or national origin. It ended unequal application of voter registration requirements and racial segregation in schools, workplaces, and facilities that serve the general public.

On February 11, 1994, Executive Order (EO) 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations," was enacted by President Clinton. The Presidential memorandum accompanying EO 12898 identified Title VI of the Civil Rights Act of 1964 as one of several federal laws that should be applied "to prevent minority communities and low-income communities from being subject to disproportionately high and adverse environmental effects." Title VI prohibits discrimination by recipients of federal financial assistance on the basis of race, color, and national origin, including the denial of meaningful access for limited English Proficient Persons.

In 2012, the Federal Transit Administration modified the requirements for all Federal Transit Administration (FTA) funded recipients related to Title VI Civil Rights Act of 1964, requiring all recipients to document their compliance with DOT's Title VI regulations by submitting a comprehensive Title VI Program to their FTA regional civil rights officer once every three years or as otherwise directed by the FTA. Additionally, the Title VI Program required approval by the submitting agency's governing entity prior to submission.

On April 11, 2017, City Council approved Special Transportation's 2017-2020 Title VI Program after many years of submitting the required documents individually.

DISCUSSION:

The City of Riverside's Title VI Program includes the processes and procedures in place by Special Transportation under the Parks, Recreation and Community Services Department as well as the Title VI plan implemented for the City by the General Services Department in 2017. This includes the General Services Department's designation of a Title VI Coordinator, a Title VI brochure outlining the City's policy on Title VI, and complaint forms in English and Spanish, all of which are posted on the City's website. These important steps taken by the City not only ensure adherence to the FTA's Title VI Program, but also create an environment of inclusivity and transparency.

On June 5, 2018, the FTA provided the City of Riverside with a Triennial Title VI Program Update-Concur Letter. The letter identified items that required correction upon submittal of the next Triennial Title VI Program. Special Transportation has updated the plan to address the following deficiencies that were noted:

- Internal complaint procedures
- Revise complaint form
- Address English Proficient Persons populations in public outreach plan
- List public participation outreach
- Clarification of subrecipients

FISCAL IMPACT:

There is no fiscal impact related to this recommendation.

Prepared by:	Adolfo Cruz, Parks, Recreation and Community Services Director
Certified as to	
availability of funds:	Edward Enriquez, Chief Financial Officer / City Treasurer
Approved by:	Rafael Guzman, Assistant City Manager
Approved as to form:	Kristi J. Smith, Interim City Attorney

Attachment: 2021 – 2024 Special Transportation Title VI Program