



U.S. Department  
of Transportation  
**Federal Transit  
Administration**

REGION VIII  
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South Dakota,  
Utah and Wyoming

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**REGION 8 BULLETIN NO: FY-12-15**

Subject: Title VI Revised Circular (4702.1B)

Program Area: Civil Rights

Date: 12/5/2012

Dear Grantees,

You received the Region 8 Bulletin No. 12-7, dated October 1, 2012. This bulletin is a follow-up on the same subject.

Please be advised that all grantees are under a new Title VI Program Reporting Schedule, and Title VI Program due dates have been slightly adjusted to allow for an orderly and predictable submission cycle. The new reporting schedule and agency due dates were attached to Bulletin No. 12-7 and are available on FTA's website at: <http://www.fta.dot.gov/civilrights/12328.html>. Any programs that were submitted to FTA prior to October 1st were reviewed for compliance with the old Circular (4702.1A). After October 1<sup>st</sup>, all Title VI programs submitted to FTA are to comply with the revised Circular (4702.1B). Please consult the reporting schedule for your agency's revised due date. Updated Title VI program reports must be submitted by the due date, which is 60 days prior to the expiration date. Failure to submit your report within the expiration date could delay grant processing and/or result drawdown restrictions. In addition, the Office of Civil Rights is no longer issuing conditional approvals on programs. If there are any deficiencies identified in the submitted program, the Regional Civil Rights Officer will contact you via email to request a correction prior to the program expiration date.

The revised FTA Title VI Circular general requirements are in most part similar to the previous (old) circular. **Here are some highlights (not all inclusive) of the revised Circular:**

- Moves low-income to a new Environmental Justice Circular, with the exception of the service and fare equity analysis section
- Sets forth the requirements for all FTA recipients and provides specific requirements for all MPOs, States, and Transit Providers

**All FTA recipients must include the following requirements in their program plans:**

- A Title VI Notice to the Public, Complaint Procedure, and Complaint Form;
- A Limited English Proficiency Plan and a Public Participation Plan;
- A list of investigations, lawsuits and complaints;
- A table depicting racial composition of membership of non-elected planning bodies, and a description of efforts to engage the public on such committees or councils;
- Information regarding the siting (location) of fixed facilities (if applicable);
- A narrative describing sub-recipient monitoring (if applicable); and

- Approval by the recipient's Board of Directors or appropriate governing entity before submitting it to the Regional Civil Rights Officer.

In addition to the above general requirements, **providers of fixed route public transportation (referred to as "transit providers")** whether direct recipients, primary recipients or subrecipients are required to include in their Title VI program plan, system-wide standards and policies. For more information on this requirement, please read Chapter IV, Requirements and Guidelines for Fixed Route Transit Providers. **This is separate from the requirements for transit providers that operate 50 or more fixed route vehicles in peak service and are located in a UZA of 200,000 or more in population.**

The revised Title VI Circular has new requirements for **transit providers that operate 50 or more fixed route vehicles in peak service and are located in a UZA of 200,000 or more in population.** The list of transit providers meeting this threshold can be found on FTA's website at <http://www.fta.dot.gov/civilrights/12328.html>. In addition to the previous requirements, these providers must:

- Submit a system-wide service standards and policies;
- Collect and report data regarding demographics and travel patterns;
- Conduct Service and Fare Equity Analysis; and
- Monitor Transit Service based on service standards.

In addition to the general reporting requirements, the revised Title VI Circular has **specific reporting requirements for MPOs, State DOTs and its subrecipients.** They are as follows:

- State DOTs have an added requirement for demographic maps that overlay demographic data, and charts that analyze the impacts of the distribution of State and Federal public transportation funds;
- More definitive information on monitoring of sub recipients; and
- Subrecipients must submit a Title VI program to their primary recipient, i.e. State DOT on schedule as determined by the State DOT.

For questions, clarifications or concerns regarding the new Title VI program requirements, please contact Region VIII's Civil Rights Officer, Rebecca Tanrath at 720.963.3313 or email address at [Rebecca.Tanrath@dot.gov](mailto:Rebecca.Tanrath@dot.gov). Thank you very much for your continued cooperation and support of FTA's Civil Rights Programs.

Sincerely,



 Linda M. Gehrke  
Regional Administrator