

APPENDIX E

MTC Title VI Tracking Form

	Date Submitted:	Submitted By:	Basis for Complaint:	Review Officer:	Findings:	Date Response Issued :
1.	3/23/11	John Ocana	TIP not adequately addressing needs of Hispanic community	C. Alvarado	No evidence to support complaint.	May 6, 2011
2.	9/28/11	John Kennedy	Why does the Clipper Card website and Walgreen's insist on some type of payment in order to receive a Clipper card. Why are the procedures for obtaining a replacement Clipper Card (which is autoloading) so cumbersome and difficult when the intent behind the Clipper Card program was to make transit riding more customer friendly. There is no analysis regarding whether minority or low-income riders are more likely to use the payment media that would be subject to the card fee. Further, there is no analysis regarding what alternative fare payment media are available for people affected by this fare change. Finally, there is no discussion regarding mitigation measures, or other means to minimize or offset any adverse effects caused by the card fee on minority or low-income populations. The Title VI document provided isn't a final document. If the MTC Board of Directors or Executive Director have not approved a final report, under what authority can a Clipper card replacement card fee be imposed if the required Title VI analysis is not complete?	R. Victor	See memo saved at J:\PROJECT\Title VI Report\Complaints\Kennedy\Mr. Kennedy Title VI Complaint-11-8-11.docx	November 10, 2011

3.	2/20/14	Jennifer Denise Washington	See J:\PROJECT\Title VI Report\Complaints\Washington 2.21.14\Washington Title VI Complaint 2.21.14.pdf	N/A	See letter saved at: J:\PROJECT\Title VI Report\Complaints\Washington 2.21.14\Washington Response_final.docx	March 5, 2014
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In addition to Title VI complaints listed above, FTA conducted a comprehensive on-site compliance review of MTC, based in part of a complaint submitted to FTA by Public Advocates, Inc., challenging MTC's compliance with its Title VI monitoring responsibilities towards subrecipients. FTA closed the Public Advocates' complaint without findings in March 2011 and conducted the on-site compliance review on September 19-21, 2011. FTA examined 14 areas of compliance with Title VI General Reporting and Program-Specific requirements. In FTA's April 2012 report on its review, it identified two areas of deficiency for corrective action: language access for LEP populations and deficiencies in the Clipper® Program Fare Equity Analysis. Specifically: (1) the four-factor analysis required by FTA in connection with the Language Access Plan was found to be deficient; staff was found not to be properly trained on LEP phone access; and MTC lacked competency standards for contractors or staff providing language assistance; and (2) MTC was found to have inadequately mitigated disparate impacts identified in its Clipper program fare equity analysis. As requested by FTA, MTC reported on its corrective actions within thirty and sixty days, and continued to provide quarterly progress reports through March 2013. Sections III.D and VI.C of this Report (respectively) include additional information regarding the corrective actions taken by MTC with respect to its Language Assistance Plan and LEP analysis, and the Clipper® transition equity analysis.