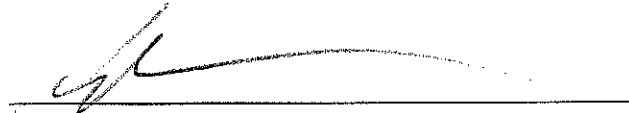


# **KINGS COUNTY AREA PUBLIC TRANSIT AGENCY**

## **TITLE VI PROGRAM**

## TITLE VI POLICY STATEMENT

The Kings County Area Public Transit Agency (KCAPTA) is committed to compliance with Title VI of the Civil Rights Act of 1964 and all related regulations and directives. KCAPTA assures that no person shall on the grounds of race, color, national origin, gender, age, or disability be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any KCAPTA service, program, or activity. The Agency also assures that every effort will be made to prevent discrimination through the impacts of its programs, policies, and activities on minority and low-income populations. In addition, the department will take reasonable steps to provide meaningful access to services for persons with Limited English Proficiency.

  
\_\_\_\_\_  
Angie Dow  
Executive Director

3/28/2016  
Date

TITLE VI  
NOTICE TO THE PUBLIC

KINGS COUNTY AREA PUBLIC TRANSIT AGENCY

- Kings County Area Public Transit Agency (KCAPTA) operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with KCAPTA.
- For more information on KCAPTA's civil rights program, and the procedures to file a complaint, contact (559) 852-2611; email [patricia.palmer@co.kings.ca.us](mailto:patricia.palmer@co.kings.ca.us); or visit our administrative office at 610 W 7<sup>th</sup> Street, Hanford CA, 93230. For more information, visit [www.mykartbus.com](http://www.mykartbus.com).
- A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5<sup>th</sup> Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 90590.
- If information is needed in another language, contact (559) 852-2611.

Notificar al Público de los Derechos Bajo el Título VI

KINGS COUNTY AREA PUBLIC TRANSIT AGENCY

- Kings County Public Area Transit Agency (KCAPTA) opera sus programas y servicios sin distinción de raza, color y origen nacional, de conformidad con el Título VI del Acta de Derechos Civiles. Cualquier persona que cree o que ha sido perjudicada por una práctica discriminatoria ilegal bajo el Título VI, puede presentar una queja ante KCAPTA.
- Para obtener más información sobre el programa de KCAPTA de los derechos humanos civiles, así como los procedimientos para presentar una queja, contacte a (559) 852-2611, correo electrónico [patricia.palmer@co.kings.ca.us](mailto:patricia.palmer@co.kings.ca.us), o visite nuestra oficina administrativa al 610 W 7th Street, Hanford CA, 93230. Para obtener más información, visite [www.mykartbus.com](http://www.mykartbus.com).
- Puede presentar una queja directamente con la Administración Federal de Tránsito mediante la presentación de una queja ante la Oficina de Derechos Civiles, Atención: Coordinador del Programa de Título VI, East Building, 5th Floor-TCR, 1200 New Jersey Ave, NW, Washington, DC. 90590.
- Si necesita información en otro idioma, póngase en contacto con (559) 852-2692.

## TITLE VI PROGRAM

*The Kings County Area Public Transit Agency (KCAPTA) is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services on the basis of race, color or national origin, as protected by Title VI of the Civil Rights Act of 1964. If you believe you have been subjected to discrimination under Title VI, you may file a written complaint with the Title VI Coordinator, Kings County Area Public Transit Agency, 610 W 7<sup>th</sup> Street, Hanford, CA 93230; at (559) 852-211; or by e-mail to [patricia.palmer@co.kings.ca.us](mailto:patricia.palmer@co.kings.ca.us).*

### I. TITLE VI PROGRAM MONITORING

The requirement to establish internal monitoring processes and methodologies is applicable to all recipients of Federal assistance. KCAPTA must monitor its service once per year, or when major service changes are proposed, using the procedures outlined in this section.

#### **a. Civil Rights Assurance**

The Assurances that are signed by KCAPTA's Executive Director and attested by KCAPTA's attorney, assure that the level and quality of transit service and related benefits are provided in a manner consistent with Title VI. Program monitoring is conducted to ensure that KCAPTA complies with this assurance.

#### **b. Incorporation of Corrective Actions into TIP**

If previous Title VI deficiencies have been found by KCAPTA or through an audit review, the corrective action to remedy these deficiencies must be incorporated into KCAG's TIP to assure compliance with Title VI.

#### **c. Monitoring Procedures**

KCAPTA must implement complaint procedures to monitor the level and quality of transit service provided to the minority community against overall system averages to determine compliance with Title VI. These comparisons will measure the actual realization of established service policies and standards.

### II. PUBLIC INFORMATION REQUIREMENTS

KCAPTA will disseminate Title VI Program information to KCAPTA employees, contractors, subcontractors, and beneficiaries as well as the general public. Public dissemination will include the posting of public statements, inclusion of Title VI language in contracts, and publishing annually the Title VI Policy Statement in newspapers having a general circulation in the vicinity of proposed projects.

- a. KCAPTA's Title VI Policy and any other related information will be available to the public upon request.
- b. More detailed information regarding complaint procedures and Title VI civil rights will be included in brochures and other materials distributed to the public by KCAPTA.
- c. Multilingual Requirements. Where a significant number or portion of the population eligible to be served by KCAPTA needs service information in a language other than English to participate in Federally funded programs, KCAPTA shall take every reasonable step to provide information in appropriate languages. In cases where KCAPTA posts signs warning the general public about dangerous situations information must be in other languages when a significant number of the population is non English speaking.

### **III. LIMITED ENGLISH PROFICIENCY (LEP) PLAN**

#### **Introduction**

Title VI of the Civil Rights Act of 1964 prohibits recipients of federal financial assistance from discriminating against or otherwise excluding individuals on the basis of race, color, or national origin in any of their activities. It has been recognized that one form of discrimination occurs through an inability to communicate due to a limited proficiency in the English language. Title VI of the Civil Rights Act of 1964, Executive Order 13166, and various directives from the US Department of Justice (DOJ) and the US Department of Transportation (DOT) require federal aid recipients to take reasonable steps to ensure meaningful access to programs, services, and activities by those who do not speak English proficiently.

To determine the extent to which LEP services are required and in which languages, the law requires the analysis of four factors:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by Kings County Area Public Transit Agency's programs, services, or activities.
2. The frequency with which LEP individuals come in contact with these programs, services or activities.
3. The nature and importance of the program, service, or activity to people's lives.
4. The resources available and the overall cost.

The goal of Kings County Area Public Transit Agency's (KCAPTA) Limited English Proficiency (LEP) Access Plan is to ensure that KCAPTA recognizes the needs of limited English proficient (LEP) members of the community and implements a plan to communicate effectively and ensure reasonable access to our processes, information, and decision-making.

#### **Kings County Area Public Transit Agency (KCAPTA) Factor Analysis**

To determine the extent to which LEP services are required and in which languages, the law requires the analysis of four factors. The following sections address each of these with respect to KCAPTA planning area.

##### **Factor 1: Review of LEP Populations**

Understanding the needs of the community begins with identifying the number of Limited English Proficiency (LEP) persons eligible to be served, likely to be served, or likely to be encountered by KCAPTA through its programs, services, or activities.

###### *Methodology for Data Sources:*

- To determine potential LEP needs in KCPATA planning area (Kings County), staff reviewed the latest data available through the US Census Bureau American Community Survey for the Period of 2010-2014.

Data collected for Kings County indicated that 18.4% of the total population 5 years and older speak English "less than very well". Further analysis shows that 16.6% of the same population speaks Spanish; 0.5% speaks an Indo-European language; 1.1% speaks and Asian or Pacific Islander language; and 0.3% speaks another language (see Table 1). This information led staff to review the Spanish speaking LEP group identify whether this population was concentrated into specific communities.

**Table 1: The Top Languages Spoken at Home in Kings County**

Population 5 years and older	No. of LEP Persons	% of LEP Persons	% of LEP Persons who speak Spanish	% of LEP Persons who speak Indo-Euro Languages	% of LEP Person who speak Asian or Pacific Islander Languages	% of LEP Persons who speak Other Languages
138,994	25,626	18.4%	16.6%	0.5%	1.1%	0.3%

Source: US Census Bureau's 2010-2014 American Community Survey

Spanish (89.8%) was reported to be the most prevalent language spoken by persons that speak English "less than very well." After reviewing the data in US Census Bureau American Community Survey, it appears that a high concentration of LEP persons live in the cities of Kettleman, Avenal, and Hanford.

**Factor 2: Assessing Frequency of Contact with LEP Persons.**

*Methodology:*

- Conduct survey of LEP persons
- Survey and collect data from drivers, route supervisors, and ticket agents to determine the frequency of contact with LEP persons, as well as the languages spoken.

The results of the surveys indicate that Spanish is the most prevalent language spoken by the LEP population in Kings County.

**Factor 3: Assessing the Importance of KCAPTA' Services.**

*Methodology:*

- Identify KCAPTA's critical services or activities

All of KCAPTA services are important; however, those related general route information, transit fares, safety, nondiscrimination, and public involvement are among the most important.

**Factor 4: Determining Available Resources.**

When planning any activity, it is imperative that an organization assess the resources available to conduct the activity in a way that is meaningful and balances those efforts with the overall cost to the organization.

*Methodology:*

- Create an inventory of language assistance measures currently provided, along with the associated cost.
- Determine what, if any, additional services are needed to provide meaningful access.
- Analyze KCAPTA's budget.

Given the size of the Spanish LEP population, KCAPTA will ensure that public notices and general information, such as the riders guide is written in Spanish and made available for viewing in places where individuals with limited English proficiency congregate such as the Transfer Facility. In addition, to improve meaningful access, transit fares have been written in Spanish and posted on the buses and at the Transfer Facility.

KCAPTA will also maintain a list of those staff members who speak a language other than English to provide a point of contact for persons needing information.

## **Language Assistance Plan**

Based on the four-factor analysis, Kings County Area Public Transit Agency (KCAPTA) recognizes the need to continue providing language services in our service area. A review of KCAPTA relevant programs, activities, and services that are being offered or will continue to be offered by KCAPTA include the following:

- Maintain a list of employees who competently speak Spanish and are willing to provide translation and/or interpretation services and distribute this list to staff that regularly have contact with the public.
- Vital documents are available in both English and Spanish.
- Public Notices are available in both English and Spanish.
- General Information, such as "Riders Guide" is available in both English and Spanish.
- Transit Fares are posted in both English and Spanish.
- Outreach meetings/forums are regularly conducted in the County to inform communities of the services offered by KCAPTA. In areas identified with a high concentration of LEP KCAPTA staff will work with other agency to insure bilingual staff is available to translate information.

KCAPTA will contact the community organizations that serve LEP persons, as well as LEP persons themselves, and perform a four-factor analysis every three years to identify what, if any additional information or activities might better improve KCAPTA services to assure non-discriminatory services to LEP persons. KCPATA will then evaluate the projected financial and personnel needed to provide the requested services and assess which of these can be provided cost-effectively.

## **IV. NOTIFICATION OF CONSTRUCTION PROJECT**

In the summer of 2016 KCAPTA plans to construct a "Transit Hub" in the City of Avenal. KCAPTA has budgeted state funds for the design and construction of the "Transit Hub". No federal funds have been program.

The proposed project site was determined by inventorying current property available which would have no impact or limited impact on the current route, population, or community. The proposed site for the construction of the "Transit Hub" provides adequate space for the "Transit Hub" and public parking. It also increases public transportation accessibility to the local community.

KCAPTA will integrate, into environmental analysis the following:

### **Environmental Justice**

The concept of environmental justice includes the identification and assessment of disproportionately high and adverse effects of programs, policies, or activities on minority and low-income population groups. Within the context of transportation planning, environmental justice considers the relative distribution of costs and benefits from transportation investment strategies and policies among different segments of society.

KCAPTA shall be responsible for evaluating and monitoring environmental justice compliance with Title VI. KCAPTA staff will:

- Ensure Title VI environmental justice compliance.
- Analyze and make findings regarding the population affected by the action.
- Analyze and make findings regarding the impacts of planned projects on protected Title VI groups, and determine if there will be a disproportionately high and adverse impact on these groups.

## **V. PUBLIC PARTICIPATION PLAN**

The Public Participation Plan outlines the strategies that KCAPTA will use to engage the public in the process of transportation decisions. This plan is utilized to cultivate relations with the community and encourage interaction with the minority and non-English speaking communities. Public Notices and general information will be provided in both English and Spanish.

### **a. OPPORTUNITIES FOR PUBLIC COMMENT:**

KCAPTA routinely provides opportunities for public comment, and continually strives to find new and innovative opportunities to solicit public comments and involve all segments of the population. Comments are accepted at any time by phone, fax, email, US mail, in person, or at any open meeting. Examples of these opportunities include:

- The public is notified of monthly KCAPTA Board meetings. The public is invited to attend these meetings. Meeting announcements are posted at KCAPTA office, at the meeting location, and at the Transfer Facility.
- KCAPTA and Kings County Association of Governments hold annual Public Hearings to learn about the needs of the residents of Kings County. The public is invited to attend and present comments or concerns about transit services. Notices are posted in the local newspaper, at the Transfer Facility, and on the buses.
- Annual Social Service Transportation Advisory Council Meetings are held. These meetings allow representative of user groups to comment and discuss concerns about transit services.
- Rider Surveys are conducted every three years. Riders are asked to comment about the transit system and make suggestions. These surveys take place at the Transfer Facility and on buses.

All public notices are in English and Spanish.

### **b. ENGAGING TITLE VI PROTECTED GROUPS**

KCAPTA realizes that there are large segments of the population from whom input is rarely, if ever received. In an effort to hear a truly representative voice of the public, KCAPTA will make all significant service-related planning and policy publications available in accessible formats for the elderly and persons with disabilities through the following steps:

Continue to be an active member of the Social Service Transportation Advisory Council. This council consists of the following members:

- Representative of potential transit users who are 65 years of age or older;
- Representative of potential transit users who are handicapped;
- Representative of local social service providers for seniors;
- Representative of local social service providers for the handicapped;
- Representative of local social service provider for persons of limited means;
- Representative from local consolidated transportation service agency;



**c. PUBLIC OUTREACH**

KCAPTA attends various community events and conducts presentations at various organizations, school systems, and senior organizations to assist in gathering information and see what services are most frequently sought by LEP population.

**d. STAFF ACCESSIBLE**

Staff is accessible in person, on the phone, by mail, by fax, or by email. Contact information is provided on the agency's website, Riders Guide, and public notices.

**e. PROVIDE SERVICE FOR THE DISABLED AND LEP**

Upon advance notice, special accommodations will be provided for public meetings. These services include translators, special assistance, and or transportation.

**f. PLANS WITH SPECIFIC PUBLIC PARTICIPATION REQUIREMENTS**

The Federal Transportation Improvement Program (FTIP) implements the policy and investment priorities expressed by the public and adopted by the Kings County Association of Governments (KCAG) in the Regional Transportation Plan (RTP). In this respect, public comments made as part of the RTP are reflected in the FTIP as well.

The FTIP covers a four-year timeframe, and all projects included in the FTIP must be consistent with the RTP. The FTIP is a comprehensive listing of Kings County transportation projects that:

- Receive federal funds, or are
- Subject to federally required action, or are
- Regionally significant, for federal air quality conformity purposes.

The FTIP is updated every two years with amendments occurring as needed and require the following public notification.

- Legally noticed 45 day public comment period;
- Legally noticed public meeting;
- Posting of information on KCAG website during the public comment period;
- Publishing amendment information as part of the following publicly available KCAG agendas: Technical Advisory Committee and Transportation Policy Committee;
- Consideration and response to public comments received during the comment period.

**VI. COMPLAINTS OF DISCRIMINATION PROCEDURE**

These procedures cover all complaints filed under Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, Civil Rights Restoration Act of 1987, and the Americans with Disabilities Act of 1990, relating to any program or activity administered by KCAPTA as to consultants, and contractors. Intimidation or retaliation of any kind is prohibited by law. The procedures do not deny the right of the complainant to file formal complaints with other state or federal agencies or to seek private counsel for complaints alleging discrimination. Every effort will be made to obtain early resolution of complaints at the lowest level possible. The option of informal mediation meeting(s) between the affected parties and the Title VI Coordinator may be utilized for resolution.

**Complaint Procedure**

1. Any individual, group of individuals or entity that believes they have been subjected to discrimination prohibited by nondiscrimination requirements may file a complaint with KCAPTA. The complaint form may be downloaded ([mykartbus.com](http://mykartbus.com)) or is available in hard

copy from Kings County Area Public Transit Agency (Appendix 1). A formal complaint must be filed within 180 days of the alleged occurrence.

2. In cases where the complainant is unable or incapable of providing a written statement, a verbal complaint may be made. The Title VI Coordinator will interview the complainant and if necessary assist the person in converting verbal complaints to writing. All complaints must, however, be signed by the complainant or his/her representative.
3. Complaints shall state, as fully as possible, the facts and circumstances surrounding the alleged discrimination.
4. KCAPTA will provide the complainant or his/her representative and any contractor (respondent) with a written acknowledgement that KCAPTA has received the complaint within five (5) working days of receipt.
5. A copy of the complaint will be forwarded to KCAPTA's legal council for review.
6. The Executive Director will assign an investigator to the complaint (this may be the Title VI Coordinator or other designated staff).
7. The Investigator will determine if the complaint has investigative merit:
  - a. It was received within 180 days of the alleged occurrence.
  - b. It does not appear to be frivolous or trivial.
  - c. It involves KCAPTA or KCAPTA contractors and not another entity.
  - d. A complaint against a contractor involves a KCAPTA Federally Funded contract.
8. The complainant and contractor or other party to the complaint will be notified of the status of the complaint within 10 days of receipt of the complaint, *by registered mail*;
  - a. That the complaint will not be investigated and the reasons why the complaint does not have investigative merit.
  - b. That the complaint will be investigated and a request for additional information needed to assist the investigator.
9. The complainant or contractor must submit the requested information within 60 working days from the date of the original request. Failure of the complainant to submit additional information within the designated timeframe may be considered good cause for a determination of no investigative merit. Failure of the contractor to submit additional information within the designated timeframe may be considered good cause for a determination of noncompliance under the contract.
10. The internal investigator and/or contractor must within 15 working days, supply the Executive Director with status report of their investigation and/or resolution of the complaint.
11. Within 60 working days of the receipt of the complaint, the investigator will prepare a written report for the Executive Director.

The report shall include:

  - a. A narrative description of the incident. Including persons or entities involved.
  - b. A statement of the issues raised by the complainant and the respondent's reply to each of the allegations.

- c. Citations of relevant Federal, State and local laws, KCAPTA policy etc.
  - d. Description of the investigation, including list of the persons contacted and a summary of the interviews conducted.
  - e. A statement of the investigator's finding and recommendations for disposition.
12. The investigative report and findings of the complaint will be sent to legal counsel for review.
13. The Executive Director shall, based on the information before him or her and in consult with legal counsel, make a determination on the disposition of the complaint. Determination shall be made within 10 days from Executive Director's receipt of the investigator's report.

Examples of disposition are as follows:

- a. Complainant is found to have been discriminated against. KCAPTA or Contractor is therefore in noncompliance with Title VI regulations. Reasons for the determination will be listed. Remedial actions that KCAPTA or the Contractor must take will be listed.
  - b. Complaint is found to be without merit. Reasons why will be listed.
14. Notice of the Executive Director's determination will be mailed to the complainant and contractor. Notice shall include information regarding appeal rights of complainant and instructions for initiating such an appeal.
- Example of a notice of appeal follows:
- a. KCAPTA will only reconsider this determination, if new facts, not previously considered.
  - b. If the complainant is dissatisfied with the determination and/or resolution set forth by KCAPTA, the same complaint may be submitted to the Federal Transit Administration (FTA) for investigation. For more information, please contact the Federal Transit Administration, Office of Civil Rights, 201 Mission Street, Suite 1650; San Francisco, CA 94105 / (415) 744-3133.
15. A copy of the complaint and KCAPTA's investigation report/letter of finding and Final Remedial Action Plan will be issued to FTA within 90 days of the receipt of the complaint.
16. After receiving FTA's comments, briefings may be scheduled with all relevant parties to the complaint.
17. A summary of the complaint and its resolution must be included in the annual report to the FTA.

## **VII. GENERAL REPORTING REQUIREMENTS**

Title VI of the Civil Rights Act of 1964 (Title VI), states the following: "No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal Financial assistance."

The Department of Justice and the Department of Transportation regulations implementing Title VI, require Federal agencies to collect data and other information to enforce Title VI. In this regard Kings County Area Public Transit Agency (KCAPTA), as an applicant and/or recipient receiving Federal funding, hereby provides to FTA the following information:

- There are NO active lawsuits or complaints naming Kings County Area Public Transit Agency nor were there any investigations, complaints, or lawsuits in the past three years, which allege discrimination on the basis of race, color, or national origin with respect to service or other transit benefits.
- There are currently no pending construction project which would negatively impact minority communities being performed by KCAPTA.

### **VIII. SERVICE STANDARDS AND POLICIES**

In order to insure compliance with the Title VI Program, Kings Count Area Public Transit Agency (KCAPTA) has implemented seven service indicators to maintain service consistency throughout Kings County to all participants of public transportation.

1. Vehicle Load or Load Factor- is a ratio of the number of seats on a vehicle to the number of passengers. KCAPTA's Paratransit System will not permit any passenger to stand. All seats are reserved by advance reservation assuring a seat for each passenger. KCAPTA's Fixed Route will not exceed the manufacturer's recommended seating and standing capacity per vehicle. A vehicle inventory list is attached indicating the seating and standing capacity per vehicle. If the fixed route exceeds the manufacturer's recommended seating and standing capacity on a recurring basis, plans must be made to decrease headway times during these peak times.
2. Vehicle Assignment – refers to the process by which transit vehicles are assigned to routes throughout the system due to variations among vehicles (age, type, size, amenities), type of service offered (express or local), timing of vehicle assignment (time of day, day of week) and other factors. Vehicles are distributed equally for each area by age, type, size, and amenities. The fixed route services uses 9 - 35' Ultra Low Floor CNG, 10-35' Low Floor CNG, and 2 – 24' Entourage.
3. Vehicle Headway- is a measurement of the time interval between two vehicles traveling in the same direction on the same route. Vehicle headways are determined according to the route length, passenger demand and the availability of funding. The driving force for decreasing headways on a fixed route is passenger demand. An evaluation is performed once a year to ascertain demand on fixed route and whether frequency of headways, at peak times or throughout the overall route needs to be adjusted.
4. On-Time Performance – is a measure of the percentage of runs that are completed as scheduled. The criterion first must define what is considered to be "on-time". The measurement of on-time performance for KCAPTA's Paratransit System will be plus or minus 15 minutes of appointment time and KCATPA's Fixed Route System is no later than 5 minutes at time points. On-time performance is achieved when 90% of all trips/runs are completed as scheduled.
5. Distribution of Transit Amenities- refers to items of comfort and convenience available to the general riding public such as benches and shelters. KCAPTA benchmarks were established as criteria for the consideration of benches and shelters. The criteria are as follows:
  - A stop served by a single route with 9 to 13 daily boarding will be considered for a bench
  - A stop served by a single route with 14-18 daily boarding will be considered for a shelter
  - Enough Public easement availability to meet ADA requirement
6. Service Availability – is a general measure of the distribution of routes within a transit district. Every five years a study of Kings County's transportation system is reviewed and

a Transit Development Plan (TDP) is written. Each year this plan is reviewed and updated accordingly. The TDP considers all aspects of Kings County including minority areas, transit dependent individuals, transit attractors, and recommendations of transit amenities. A major part of the process of the TDP is public involvement. KCPATA develops our system according to the TDP and funding availability.

When routes are developed, stops are placed within one mile of each other if feasible.

#### **IX. RECORD KEEPING REQUIREMENTS**

The Title VI Coordinator shall ensure that all records relating to KCAPTA's compliance to Title VI are maintained for a minimum of seven years.

Records must be available for compliance review audits.

Copies of the following material will be kept available by the Title VI Coordinator for dissemination to the public upon demand:

- KCAPTA's Title VI policy.
- Annual reports to FTA.
- Audit report findings and recommendations.
- Summaries of actions taken by KCAPTA to remedy audit findings.
- Complaints received and a summary of their disposition.
- Annual report to Executive Director regarding Title VI compliance.