

Title VI Implementation Plan

City of Cottonwood / Cottonwood Area Transit Public Participation Plan 2020



"Inspiring a Vibrant Community"



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Para Información en Español: Amber Richards, CAT Office Administrator

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Executive Summary

Cottonwood Area Transit (CAT) provides local transit services for Cottonwood, Clarkdale and Verde Villages. CAT operates four fixed routes plus complementary Paratransit services. CAT also operated the Verde Lynx commuter route that serves Cottonwood and Sedona. Cottonwood routes run Monday – Friday, 6:45 am to 6:45 pm. Verde Lynx routes run 7 days a week, 6:00 am – 7:15 pm Monday – Saturday, and 7:30 am – 6:00 pm on Sunday. CAT also provides complementary ADA paratransit service 5 days a week for CAT routes.

Cottonwood has had a transit system in place since the mid 1980's. It has grown from one purple bus to 10 active buses daily and over 160,000 passengers carried during the last fiscal year (ended 6/30/2020). Cottonwood Area Transit, in 2016, was awarded AzTA's 2016 Small Urban / Rural Transit System of the Year award. CAT works with other organizations to assist them in their transportation needs and is very active in coordinating transportation for the elderly, the disabled, and non-drivers of all ages.

What type of program fund(s) did you apply for?

- 5310
- 5311
- Other (please explain) _____

Type of Funding Requests? (Check all that apply)

- Vehicle Funds
- Operating Funds
- Other (please explain) Capital funding

Is your agency receiving direct funds from FTA?

- If yes, please attach a copy of your FTA letter of approval of Title VI Plan.
- No

Non Discrimination Policy Statement

The **City of Cottonwood / Cottonwood Area Transit** policy assures full compliance with Title VI of the Civil Rights act of 1964, the Restoration Act of 1987, section 504 of the Rehabilitation Act of 1973, the Americans with Disabilities Act of 1990 (ADA), and related statutes and regulations in all programs and activities. Title VI states that “no person shall on the grounds of race, color, national origin, or disability be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination” under any **City of Cottonwood / Cottonwood Area Transit** sponsored program or activity. There is no distinction between the sources of funding.

City of Cottonwood / Cottonwood Area Transit 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. Furthermore, **City of Cottonwood / Cottonwood Area Transit** will take reasonable steps to provide meaningful access to services for persons with limited English proficiency.

When **City of Cottonwood / Cottonwood Area Transit** distributes Federal-aid funds to another entity/person, **City of Cottonwood / Cottonwood Area Transit** will ensure all sub-recipients fully comply with **City of Cottonwood / Cottonwood Area Transit** Title VI Nondiscrimination Program requirements. The **Mayor of Cottonwood, Arizona** has delegated the authority to **Amanda Wilber, Human Resources/Risk Manager**, Title VI Program Coordinator, to oversee and implement FTA Title VI requirements.

Non Discrimination Notice to the Public

Notifying the Public of Rights Under Title VI and ADA City of Cottonwood / Cottonwood Area Transit Public Participation Plan

City of Cottonwood / Cottonwood Area Transit Public Participation Plan operates its programs and services without regard to race, color, national origin or disability in accordance with Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act of 1990 (ADA). Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the **City of Cottonwood / Cottonwood Area Transit Public Participation Plan**.

For more information on the **City of Cottonwood / Cottonwood Area Transit Public Participation Plan's** civil rights program, and the procedures to file a complaint, contact **Amanda Wilber, HR Manager, (928) 340-2713, (TTY 7-1-1); email awilber@cottonwoodaz.gov**; or visit our administrative office at **821 N. Main Street, Cottonwood, AZ 86326**. For more information, visit **www.ride-cat.com**.

Complaints may be filed directly with the Arizona Department of Transportation (**ADOT**) **Civil Rights Office**. ATTN: Title VI Program Coordinator 206 S. 17TH Ave MD 155A Phoenix, AZ RM: 183 Phoenix AZ, 85007 or with the Federal Transit Administration (**FTA**). ATTN: Title VI Program Coordinator, 1200 New Jersey Ave., SE Washington DC 20590

If information is needed in another language, contact **(928) 634-2287**. *Para información en Español llame: **Amber Richards, CAT Office Administrator**

The above notice is posted in the following locations: City and CAT offices, CAT buses, on schedules.

This notice is posted online at www.ride-cat.com

Non Discrimination Notice to the Public - Spanish

Aviso Público Sobre los Derechos Bajo el Título VI Y ADA City of Cottonwood / Cottonwood Area Transit Public Participation Plan

City of Cottonwood / Cottonwood Area Transit Public Participation Plan (y sus subcontratistas, si *cualquiera*) asegura cumplir con el Título VI de la Ley de los Derechos Civiles de 1964, Sección 504 de la Ley de Rehabilitación de 1973 y La Ley de ciudadanos Americanos con Discapacidades de 1990 (ADA). El nivel y la calidad de servicios de transporte serán proveídos sin consideración a su raza, color, país de origen, o discapacidad.

Para obtener más información sobre el programa de Derechos Civiles de **City of Cottonwood / Cottonwood Area Transit Public Participation Plan**, y los procedimientos para presentar una queja, contacte **Amanda Wilber, HR Manager (928) 340-2713, (TTY 7-1-1)**; o visite nuestra oficina administrativa en **821 N. Main Street, Cottonwood, AZ 86326**. Para obtener más información, visite **www.ride-cat.com**

Una queja puede ser presentada con la oficina de Derechos Civiles del Departamento de Transporte de Arizona (**ADOT**). Atención: Title VI Program Manager, 206 S. 17th Ave MD 155A Phoenix AZ, 85007 o con la Administración Federal de Transporte (**FTA**). Atención: Title VI Coordinator, 1200 New Jersey Ave., SE Washington DC 20590

If information is needed in another language or format, contact (928) 634-2287. Para información en Español llame: Amber Richards, CAT Office Administrator

The above notice is posted in the following locations: City and CAT offices, CAT Buses, on Schedules.

This notice is posted online at www.ride-cat.com

Non Discrimination ADA/Title VI Complaint Procedures

These procedures provide guidance for all complaints filed under Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act of 1990 (ADA) as they relate to any program or activity that is administered by **City of Cottonwood / Cottonwood Area Transit Public Participation Plan** including consultants, contractors and vendors. Intimidation or retaliation as a result of a complaint is prohibited by law. In addition to these procedures, complainants reserve the right to file a formal complaint with other State or Federal agencies or to seek private counsel for complaints alleging discrimination. Every effort will be made to resolve complaints at the lowest possible level.

- (1) Any person who believes he and/or she has been discriminated against on the basis of race, color, national origin, or disability may file a Discrimination complaint by completing and submitting the agency's Title VI Complaint Form.
- (2) Formal complaints must be filed within **180** calendar days of the last date of the alleged act of discrimination or the date when the alleged discrimination became known to the complainant(s), or where there has been a continuing course of conduct, the date on which the conduct was discontinued or the latest instance of the conduct.
- (3) Complaints must be in writing and signed by the complainant(s) and must include the complainant(s) name, address and phone number. The ADA/Title VI contact person will assist the complainant with documenting the issues if necessary.
- (4) Allegations received by fax or e-mail will be acknowledged and processed, once the identity of the complainant(s) and the intent to proceed with the complaint have been established. For this, the complainant is required to mail a signed, original copy of the fax or email transmittal for the complaint to be processed.
- (5) Allegations received by telephone will be reduced to writing and provided to the complainant for confirmation or revision before processing. A complaint form will be forwarded to the complainant for him/her to complete, sign and return for processing.
- (6) Once submitted **City of Cottonwood / Cottonwood Area Transit Public Participation Plan** will review the complaint form to determine jurisdiction. All complaints will receive an acknowledgement letter informing her/him whether the complaint will be investigated by the **City of Cottonwood / Cottonwood Area Transit Public Participation Plan** or submitted to the State or Federal authority for guidance.

- (7) **City of Cottonwood / Cottonwood Area Transit Public Participation Plan** will notify the ADOT Civil Rights Office of ALL Discrimination complaints within 72 hours via telephone at 602-712-8946; or email at civilrightsoffice@azdot.gov.
- (8) **City of Cottonwood / Cottonwood Area Transit Public Participation Plan** has **30** business days to investigate the complaint. If more information is needed to resolve the case, the Authority may contact the complainant. The complainant has **30** business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within **30** business days, the Authority can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.
- (9) After the investigator reviews the complaint, she/he will issue one of two letters to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Discrimination violation and that the case will be closed. An LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member or other action will occur.
- (10) A copy of either the closure letter or LOF must be also be submitted to ADOT within **72** hours of that decision. Letters may be submitted by hardcopy or email.
- (11) A complainant dissatisfied with **City of Cottonwood / Cottonwood Area Transit Public Participation Plan** decision may file a complaint with the Arizona Department of Transportation (**ADOT**) or the Federal Transit Administration (**FTA**) offices of Civil Rights: **ADOT**: ATTN ADA/Title VI Program Coordinator 206 S. 17TH Ave MD 155A RM: 183 Phoenix AZ, 85007 **FTA**: Attention Title VI Program Coordinator, East Building, 5th Floor-TCR 1200 New Jersey Ave., SE Washington DC 20590
- (12) A copy of these procedures can be found online at: www.ride-cat.com.

If information is needed in another language, contact **(928) 634-2287**. *Para información en Español llame: **Amber Richards, CAT Office Administrator**

Discrimination ADA/Title VI Complaint Form

Section I:		
Name:		
Address:		
Telephone (Home):	Telephone (Work):	
Electronic Mail Address:		
Accessible Format Requirements?	<input type="checkbox"/> Large Print	<input type="checkbox"/> Audio Tape
	<input type="checkbox"/> TDD	<input type="checkbox"/> Other
Section II:		
Are you filing this complaint on your own behalf?	<input type="checkbox"/> Yes*	<input type="checkbox"/> No
<i>*If you answered "yes" to this question, go to Section III.</i>		
If not, please supply the name and relationship of the person for whom you are complaining.		
Please explain why you have filed for a third party:		
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Section III:		
I believe the discrimination I experienced was based on (check all that apply):		
<input type="checkbox"/> Race	<input type="checkbox"/> Color	<input type="checkbox"/> National Origin
<input type="checkbox"/> Disability		
Date of Alleged Discrimination (Month, Day, Year): _____		
Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.		

Section VI:		
Have you previously filed a Discrimination Complaint with this agency?	<input type="checkbox"/> Yes	<input type="checkbox"/> No

If yes, please provide any reference information regarding your previous complaint.

Section V:

Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?

Yes No

If yes, check all that apply:

Federal Agency: _____

Federal Court: _____ State Agency: _____

State Court : _____ Local Agency: _____

Please provide information about a contact person at the agency/court where the complaint was filed.

Name:

Title:

Agency:

Address:

Telephone:

Section VI:

Name of agency complaint is against:

Name of person complaint is against:

Title:

Location:

Telephone Number (if available):

You may attach any written materials or other information that you think is relevant to your complaint. Your signature and date are **required** below:

Signature

Date

Please submit this form in person at the address below, or mail this form to:

City of Cottonwood / Cottonwood Area Transit Public Participation Plan

Amanda Wilber, HR Manager

821 N. Main Street, Cottonwood, AZ 86326

(928) 340-2713

awilber@cottonwoodaz.gov

If information is needed in another language, contact **(928) 634-2287**. *Para información en Español llame: **Amber Richards, CAT Office Administrator**

A copy of this form can be found online at **www.ride-cat.com**

Discrimination ADA/Title VI Investigations, Complaints, and Lawsuits

If no investigations, lawsuits, or complaints were filed select the option below.

City of Cottonwood / Cottonwood Area Transit Public Participation Plan has not had any ADA nor Title VI Discrimination complaints, investigations, or lawsuits in **2019-2020**.

Complainant	Date (Month, Day, Year)	Basis of Complaint (Race, Color, National Origin or Disability)	Summary of Allegation	Status	Action(s) Taken	Final Findings?
Investigations						
1)						
2)						
Lawsuits						
1)						
2)						
Complaints						
1)						
2)						

Public Participation Plan

City of Cottonwood / Cottonwood Area Transit Public Participation Plan 2020



"Inspiring a Vibrant Community"



(928) 340-2713

City of Cottonwood / Cottonwood Area Transit Public Participation Plan is engaging the public in its planning and decision-making processes, as well as its marketing and outreach activities. The public will be invited to participate in the process whether through public meetings or surveys.

As an agency receiving federal financial assistance, City of Cottonwood / Cottonwood Area Transit Public Participation Plan made the following community outreach efforts and activities to engage minority and Limited English Proficient populations since the last Title VI Plan submittal to ADOT CRO.

City of Cottonwood / Cottonwood Area Transit will make the following community outreach efforts for the **upcoming year**:

- Expand the distribution of agency brochures
- Advertise public announcements through newspapers, fliers, or radio
- Post the Nondiscrimination Public Notices to the following locations:
 - Within transportation vehicles
 - Pick up and drop off stations
 - Lobby of agency
- Partner with other local agencies to advertise services provided.
- Host public information meetings and or hearings.
- Add public interactive content to the agency's webpage for the public e.g. social media, to communicate schedule changes or activities.
- Host an information booth at a community event
- Update agency documents/publications to make them more user-friendly e.g. comment forms or agency brochures.
- List other _____

(1) Transit Advisory Meetings – Public meetings held every other month with the majority stakeholders to discuss transit operations and plans. Usually held in the large conference room at the Cottonwood Recreation Center.

(2) Transportation Manager has participated in numerous community events where transportation issues were the focus of the event such as roundtables, community action group events, special meetings at senior centers and senior community centers.

(3) City Council meetings when transit issues are being discussed as part of the agenda.

(4) Coordination meetings with NACOG and other transit providers every other month.

(5) Transportation Planning Organization meetings for Yavapai County every other month in the Yavapai County offices.

(6) Work with Chambers of Commerce, Catholic Charities, Goodwill, DES and others to provide transit passes for special events such as Job Fairs, employment events, job interviews, job training, and educational events.

(7) Ads appear in several relocation guides and on associated websites for people looking to move into the area.

(8) All meeting notices and special event notices appear in the local papers, are run as public service announcements on the local radio stations, are posted in city offices and primary pass purchasing offices, as well as on all the buses.

In the upcoming year, City of Cottonwood / Cottonwood Area Transit will make the following community outreach efforts:

(1) Transit Advisory Meetings – Public meetings held every other month with the majority stakeholders to discuss transit operations and plans. Usually held in the large conference room at the Cottonwood Recreation Center.

(2) Transportation Manager has participated in numerous community events where transportation issues were the focus of the event such as roundtables, community action group events, special meetings at senior centers and senior community centers.

(3) City Council meetings when transit issues are being discussed as part of the agenda.

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(8) All meeting notices and special event notices appear in the local papers, are run as public service announcements on the local radio stations, are posted in city offices and primary pass purchasing offices, as well as on all the buses.

Public Meetings:

(1) Public meetings are scheduled to increase the opportunity for attendance by stakeholders and the general public. This may require scheduling meetings during non-traditional business hours, holding more than one meeting at different times of the day or on different days, and checking other community activities to avoid conflicts.

(2) When a public meeting or public hearing is focused on a planning study or program related to a specific geographic area or jurisdiction within the region, the meeting or hearing is held within that geographic area or jurisdiction.

(3) Public meetings are held in locations accessible to people with disabilities and are located near a transit route when possible.

City of Cottonwood / Cottonwood Area Transit submits to the Arizona Department of Transportation annually an application for funding. Part of the annual application is a public notice, which includes a 30-

day public comment period.

***PLEASE ATTACH SAMPLE DOCUMENTS OF PUBLIC PARTICIPATION METHODS
HERE.**

Limited English Proficiency Plan

City of Cottonwood / Cottonwood Area Transit

Limited English Proficiency Plan



"Inspiring a Vibrant Community"



City of Cottonwood / Cottonwood Area Transit Public Participation Plan has developed the following Limited English Proficiency Plan (LEP) to help identify reasonable steps to provide language assistance for LEP persons seeking meaningful access to **City of Cottonwood / Cottonwood Area Transit Public Participation Plan** services as required by Executive Order 13166. A Limited English Proficiency person is one who does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English.

This plan details procedures on how to identify a person who may need language assistance, the ways in which assistance may be provided, training to staff, notification to LEP persons that assistance is available, and information for future plan updates. In developing the plan while determining the **City of Cottonwood / Cottonwood Area Transit Public Participation Plan**'s extent of obligation to provide LEP services, the **City of Cottonwood / Cottonwood Area Transit Public Participation Plan** undertook a U.S. Department of Transportation four-factor LEP analysis which considers the following:

- 1) The number or proportion of LEP persons eligible in the **City of Cottonwood / Cottonwood Area Transit Public Participation Plan** service area who may be served or likely to encounter by **City of Cottonwood / Cottonwood Area Transit Public Participation Plan** program, activities, or services;

Selected Social Characteristics in the CAT Service Area (City of Cottonwood)	Estimate	Margin of Error	Percent	Margin of Error
LANGUAGE SPOKEN AT HOME				
Population 5 years and older	10,994	+/- 170	10994	NA
English Only	8,481	+/-678	77.1%	+/-6.2
Language other than English	2,513	+/-694	22.9%	+/-6.2
Speak English less than "very well"	1,205	+/-624	11.0%	+/-5.7
Spanish	2,363	+/-694	21.5%	+/-6.2
Speak English less than "very well"	1,203	+/-624	10.9%	+/-5.7
Other Indo-European Languages	136	+/-68	1.2%	+/-0.6
Speak English less than "very well"	0	+/-101	0.0%	+/-0.4
Asian and Pacific Islander	0	+/-101	0.0%	+/-0.4
Speak English less than "very well"	0	+/-101	0.0%	+/-0.4
Other Languages	14	+/-23	0.1%	+/-0.2
Speak English less than "very well"	2	+/-5	0.0%	+/-0.1

(Based on 2010 Census Data)

- 2) The frequency with which LEP individuals come in contact with a **City of Cottonwood / Cottonwood Area Transit Public Participation Plan** services;

Ridership statistics across all Cottonwood Area Transit services from July 1, 2018 – June 30, 2019 indicated a monthly average ridership of 12,548, Saturday average of 610 and Sunday average of 466. **City of Cottonwood / Cottonwood Area Transit** averages 5 LEP contacts per year.

- 3) The nature and importance of the program, activities or services provided by the **City of Cottonwood / Cottonwood Area Transit Public Participation Plan** to the LEP population.

As an agency providing public transportation for Cottonwood, Clarkdale, Sedona, and Yavapai County, AZ, CAT participates heavily in public community outreach. CAT strives to meet the needs of its client base to make sure that all segments of the population, including LEP persons, have the opportunity to be provided public transit.

CAT has an organized advisory council that offers suggestions and/or observations about transit service. It is comprised of a former member of the Cottonwood City Council, Clarkdale City Manager, Clarkdale Council Member, Assistant City Manager for Sedona, Executive Director of Verde Valley Caregivers Coalition, representing the disabled, disadvantaged, and transportation challenged in Yavapai and Coconino Counties, representative of NACOG (Northern Arizona Council of Governments), and a Current City Council member for the City of Cottonwood.

Transit-related information is available in Spanish and posted on all buses. This information includes fares and policies and where to obtain CAT passes, punch cards, and CAT/LYNX schedules if drivers do not have any, and courtesy rules for riding the bus.

Denial or delay of access to services or information provided by CAT would not have life-threatening implications for a LEP individual. It is also believed that denial or delay of access to services or information provided by CAT would not have serious implications on an LEP individual, in comparison to services such as health, emergency transportation, water, sewer, fire protection, police protection and other emergency services provided by other local governments or organizations.

- 4) The resources available to **City of Cottonwood / Cottonwood Area Transit Public Participation Plan** and overall costs to provide LEP assistance. A brief description of these considerations is provided in the following section.

U.S. Department of Transportation Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons published in the Federal Register: December 14, 2005 (Volume 70, Number 239) states:

Certain DOT recipients, such as those serving very few LEP persons or those with very limited resources may choose not to develop a written LEP plan.

While CAT does serve few LEP persons and has very limited resources, the decision has been made to develop a written Limited English Proficiency Plan because of the requirement of ADOT to develop such a plan.

Funds available and persons available for LEP services, at the present time, are derived entirely from existing City of Cottonwood operating funds and personnel, and compete with other operational requirements of the City.

A statement in Spanish will be included in all public outreach notices. Every effort will be made to provide vital information to LEP individuals in the language requested.

City of Cottonwood / Cottonwood Area Transit provides a statement in Spanish and will for additional languages specific to the LEP community make up that will be included in all public outreach notices. Every effort will be made to provide vital information to LEP individuals in the language requested.

Safe Harbor Provision for written translations

City of Cottonwood / Cottonwood Area Transit Public Participation Plan complies with the Safe Harbor Provision, as evidenced by the number of documents available in the Spanish language. With respect to Title VI information, the following shall be made available in Spanish:

- (1) Non Discrimination Notice
- (2) Discrimination Complaint Procedures
- (3) Discrimination Complaint Form

In addition, we will conduct our marketing (including using translated materials) in a manner that reaches each LEP group. Vital documents include the following:

- (1) Notices of free language assistance for persons with LEP
- (2) Notice of Non-Discrimination and Reasonable Accommodation
- (3) Outreach Materials
- (4) Bus Schedules
- (5) Route Changes
- (6) Public Hearings

1) **City of Cottonwood / Cottonwood Area Transit** provides language assistance services through the below methods:

- X Staff is provided a list of what written and oral language assistance products and methods the agency has implemented and how agency staff can obtain those services.
 - X Instructions are provided to customer service staff and other **City of Cottonwood / Cottonwood Area Transit** staff who regularly take phone calls from the general public on how to respond to an LEP caller.
 - X Instructions are provided to customer service staff and others who regularly respond to written communication from the public on how to respond to written communication from an LEP person.
 - X Instructions are provided to vehicle operators, station managers, and others who regularly interact with the public on how to respond to an LEP customer.
 - X Use of "I Speak" cards.
 - X Bilingual or multilingual versions of:
 - X "How to ride" brochures
 - X System maps and timetables
 - X Safety and security announcements
 - X Service change announcements
 - List other
-

2) **City of Cottonwood / Cottonwood Area Transit** has a process to ensure the competency of interpreters and translation service through the following methods:

City of Cottonwood / Cottonwood Area Transit will ask the interpreter or translator to demonstrate that he or she can communicate or translate information accurately in both English and the other language. **City of Cottonwood / Cottonwood Area Transit** will train the interpreter or translator in specialized terms and concepts associated with the agency's policies and activities. **City of Cottonwood / Cottonwood Area Transit** will instruct the interpreter or translator that he or she should not deviate into a role as counselor, legal advisor, or any other role aside from interpreting or translator. **City of Cottonwood / Cottonwood Area Transit** will ask the interpreter or translator to attest that he or she does not have a conflict of interest on the issues that they would be providing interpretation services.

3) **City of Cottonwood / Cottonwood Area Transit** provides notice to LEP persons about the availability of language assistance through the following methods:

- Posting signs in intake areas and other points of entry
- Statements in outreach documents that language services are available from the agency.
- Working with community-based organizations and other stakeholders to inform LEP individuals of the Recipients' services, including the availability of language assistance services
- Announcements at community meetings
- Information tables at local events
- Signs and handouts available in vehicles and at stations
- Agency websites
- Customer service lines
- List other _____

4) **City of Cottonwood / Cottonwood Area Transit** monitors, evaluates and updates the LEP plan through the following process:

City of Cottonwood / Cottonwood Area Transit will monitor the LEP plan by conducting an annual Four-Factor analysis, establishing a process to obtain feedback from internal staff and members of the public and conducting internal evaluations to determine whether the language assistance measures are working for staff. **City of Cottonwood / Cottonwood Area Transit** will make changes to the language assistance plan based on feedback received. **City of Cottonwood / Cottonwood Area Transit** may take into account the cost of proposed changes and the resources available to them. Depending on the evaluation **City of Cottonwood / Cottonwood Area Transit** may choose to disseminate more widely those language assistance measures that are particularly effective or modify or eliminate those measures that have not been effective. **City of Cottonwood / Cottonwood Area Transit** will consider new language assistance needs when expanding transit service into areas with high concentrations of LEP persons will consider modifying their implementation plan to provide language assistance measures to areas not previously served by the agency.

5 **City of Cottonwood / Cottonwood Area Transit** trains employees to know their obligations to provide meaningful access to information and services for LEP persons and all employees in public contact positions will be properly trained to work effectively with in-person and telephone interpreters. **City of**

Cottonwood / Cottonwood Area Transit will implement processes for training of staff through the following procedures:

City of Cottonwood / Cottonwood Area Transit will identify staff that are likely to come into contact with LEP persons as well as management staff that have frequent contact with LEP persons in order to target training to the appropriate staff. **City of Cottonwood / Cottonwood Area Transit** will identify existing staff training opportunities, as it may be cost-effective to integrate training on their responsibilities to persons with limited English proficiency into agency training that occurs on an ongoing basis. **City of Cottonwood / Cottonwood Area Transit** will include this training as part of the orientation for new employees. Existing employees, especially managers and those who work with the public may periodically take part in re-training or new training sessions to keep up to date on their responsibilities to LEP persons. **City of Cottonwood / Cottonwood Area Transit** will implement LEP training to be provided for agency staff. **City of Cottonwood / Cottonwood Area Transit** staff training for LEP to include:

- A summary of the **City of Cottonwood / Cottonwood Area Transit** responsibilities under the DOT LEP Guidance;
- A summary of the **City of Cottonwood / Cottonwood Area Transit** language assistance plan;
- A summary of the number and proportion of LEP persons in the **TYPE City of Cottonwood / Cottonwood Area Transit** service area, the frequency of contact between the LEP population and the agency's programs and activities, and the importance of the programs and activities to the population;
- A description of the type of language assistance that the agency is currently providing and instructions on how agency staff can access these products and services; and
- A description of the **City of Cottonwood / Cottonwood Area Transit** cultural sensitivity policies and practices.

***PROVIDE SAMPLE DOCUMENTS YOUR AGENCY PROVIDES FOR LEP INDIVIDUALS**

Non-elected Committees Membership Table

Subrecipients who select the membership of transit-related, non-elected planning boards, advisory councils, or committees must provide a table depicting the membership of those organizations broken down by race. Subrecipients also must include a description of the efforts made to encourage participation of minorities on these boards, councils, and committees.

City of Cottonwood / Cottonwood Area Transit Public Participation Plan does not select the membership of any transit-related committees, planning boards, or advisory councils.

Monitoring for Subrecipient Title VI Compliance

City of Cottonwood / Cottonwood Area Transit Public Participation Plan does not monitor subrecipients for Title VI compliance as it does not have subrecipients,

Title VI Equity Analysis

A subrecipient planning to acquire land to construct certain types of facilities must not discriminate on the basis of race, color, or national origin, against persons who may, as a result of the construction, be displaced from their homes or businesses. “Facilities” in this context does not include transit stations or bus shelters, but instead refers to storage facilities, maintenance facilities, and operation centers.

There are many steps involved in the planning process prior to the actual construction of a facility. It is during these planning phases that attention needs to be paid to equity and non-discrimination through equity analysis. The Title VI Equity Analysis must be done before the selection of the preferred site.

Note: Even if facility construction is financed with non-FTA funds, if the subrecipient organization receives any FTA dollars, it must comply with this requirement.

City of Cottonwood / Cottonwood Area Transit Public Participation Plan has no current or anticipated plans to develop new transit facilities covered by these requirements. No facilities covered by these requirements have been developed since 2009.

Fixed Route Transit Provider Analysis

Fixed Route: Public transit service (other than by aircraft) provided on a repetitive, fixed-schedule basis along a specific route, with vehicles stopping to pick up passengers.

A subrecipient providing fixed route service, as defined above, must determine the distribution of transit amenities or the vehicle assignments for each mode in a non-discriminatory manner. The subrecipient must develop policies to ensure service is not distributed on the basis of race, color, or national origin.

Effective practices to fulfill the Service Standards requirements include developing written policies covering each of the following service indicators: (can be expressed in writing or in table format – see Circular Appendix G & H pp. 87-91)

1) *Vehicle Load for Each Mode*

- a. CAT, All Routes – 1:1, both peak and off peak. We generally have more seating than passengers. This is local fixed route service.
- b. Lynx - 1:1, both peak and off peak. While we occasionally will have a standee, this is rare and only happens when we have to substitute a smaller bus when one of the large buses is down for scheduled maintenance. This is our commuter service.

2) *Vehicle Headway for Each Mode*

- a. CAT, Local Service – 45 minutes, all times
- b. Lynx, Commuter Service – 45 minutes, peak; 90 minutes off-peak, weekends.

3) *On Time Performance for Each Mode*

- a. CAT, local service – 99% on-time, 0-5 minutes within scheduled time being “on time”
- b. LYNX, commuter service – 94% on-time, 0-5 minutes within scheduled being “on time”
- c. ADA Paratransit – 95% on time, 0-5 minutes with scheduled window for pickup and drop-off.

4) *Service Availability for Each Mode*

- a. CAT, ADA Local Service – Monday – Friday, 6:45am – 6:45pm
- b. LYNX, Commuter Service – Monday – Friday, 6:00am – 7:15pm, 2 buses
Saturday, 6:00am – 7:15pm, 1 bus
Sunday, 7:30am – 6:00pm, 1 bus
- c. All services run most holidays except Thanksgiving, Christmas, and New Years’ Day.

Effective qualitative practices to fulfill the Service Policy requirements include developing written policies covering each of the following service indicators:

5) *Transit amenities for each mode*

a. CAT – The following items are provided to riders:

- i. Shelters – Lighted shelters are located along the fixed routes in areas where there are two or more routes in close proximity or where two routes share a stop. They are usually at places where riders may transfer from one route to another. Trash receptacles are provided at the shelters and on all buses.
- ii. Signs – Designated stops have signs to let the public know where they are located. These stops are located so that the bulk of the riding public is no more than two or three blocks from a designated stop.
- iii. Schedules – All buses have schedules for all services operated by CAT and LYNX and also have schedules for the Yavapai Apache Nation Transit, which connects with CAT/Lynx in Cottonwood. Schedules contain time tables for the various stops and routes, as well as maps of the routes. Schedules may also be obtained at the Cottonwood City Hall, Human Resources/Finance Office, Library, Recreation Center, Chamber of Commerce Center, and most hotels/motels in the CAT service area.

b. LYNX – The following items are provided to riders:

- i. Shelters – Lynx uses the shelters at the Cottonwood Library and the Circle K stops in Cottonwood. The City of Sedona has provided several shelters along 89A in West Sedona and along 179 South toward the Village of Oak Creek. They plan to install more as funding is secured.
- ii. Signs – Designated stops have signs to let the public know where they are located. These stops are located along the main route through Sedona to the Uptown Municipal Parking Lot, a designated park and ride facility for the Lynx.
- iii. Schedules – All buses have schedules for all services operated by CAT and LYNX and also have schedules for the Yavapai Apache Nation Transit, which connects with CAT/Lynx in Cottonwood. Schedules contain time tables for the various stops and routes, as well as maps of the routes. Schedules may also be obtained at the Sedona City Hall, Library, Chamber of Commerce Center, and most hotels/motels in the LYNX service area.

6) *Vehicle assignments for each mode*

Generally, our buses are fairly well interchangeable on any service, with the exception of the two 33 passenger Navistar buses used exclusively on the LYNX service. The rest are 19 or 14 passenger cutaway vans that we use interchangeably on the routes to maximize the mileage for each bus. Additionally, we have MV-1 vehicles for use on our ADA service. These are similar to minivans, with a maximum of 5 passengers or 2 wheelchairs and 2 passengers.

Board Approval for the Title VI Plan

****(INSERT A COPY OF THE BOARD MEETING MINUTES AFTER
CONDITIONAL CRO APPROVAL. BOARD MINUTES MUST BE FOR THE
YEAR OF THE GRANT APPLICATION CYCLE)***