## **Title VI Implementation Plan**



## City of Douglas/Douglas Rides 2024

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### **Executive Summary**

The City of Douglas, incorporated in 1905, is a municipal government agency. The City provides essential public services to the community of Douglas. One of the public services provided by the City of Douglas is public transit, through Douglas Rides. Douglas Rides is operated under the Transit/Neighborhood Resources Department as can be seen by the attached organizational chart. The City of Douglas is a recipient of 5311 grant funds for transit operations and has been a grantee since 2012.

Douglas Rides, with service open to the general public, operates 7 routes with over 50 stops throughout the City of Douglas. All routes originate from a central transfer point located at 11th Street between "G" and "H" Avenues.

These routes include:

- Midtown
- Pirtleville Bay Acres Downtown
- Elfrida
- Dial-A-Ride
- Bisbee/Cochise College
- Cochise Connection

Service operates Monday through Saturday, 6 days a week between the hours of 8 a.m. and 5 p.m. The Cochise Connection route operates Monday through Friday from 6a.m. to 6p.m. and Saturdays from 8:00 a.m. to 4:04 p.m.

Douglas Rides provides transportation to elderly and disabled clients in a manner that goes above and beyond ADA requirements.

The deviated fixed route system goes up to ¾ mile from the established route to provide service to elderly and disabled clients who wish to use the fixed route system but cannot get to an established stop. This includes deviations necessary to deliver elderly and disabled riders to their destinations, as long as the deviations are scheduled in advance with the dispatcher and can be made in a safe and efficient manner that does not severely affect the schedule

In addition Douglas Rides provides the following services;

• Contracts with Southeastern Arizona Government Organization (SEAGO Area Agency

on Aging) to provide transportation to the elderly and the disabled in the following

#### communities:

o In the City of Douglas, Dial-A-Ride service is provided by the Douglas Rides

program, and requires a 24-hour advance notice.

o Inter-city service is provided to Elfrida one day a week, every other week. Elderly and disabled clients are brought to Douglas for grocery shopping, nutrition services, and medical appointments.

The Dial-A-Ride system offers door to door service to residents of Douglas, Pirtleville and Elfrida. These services are offered to those with disabilities regardless of age.

 Contracts with Cochise College to provide students free rides Monday through Thursdays four times a day. This route loops from Douglas, the College, Bisbee and back.

What t	ype of program fund(s)	did you apply for?
	5310 5311 Other (please explain)	
Type of	f Funding Requests? (Ch	eck all that apply)
	Vehicle Funds Operating Funds Other (please explain)	Capital Funds and Planning Funds
ls your	agency receiving direct	funds from FTA?
□If ye	s, please attach a copy o	f your FTA letter of approval of Title VI Plan.
⊠No		

### Non-Discrimination Notice to the Public

## Notifying the Public of Rights Under Title VI and ADA City of Douglas/Douglas Rides

City of Douglas/Douglas Rides 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 Douglas/Douglas Rides.

For more information on the City of Douglas/Douglas Rides's civil rights program, and the procedures to file a complaint, contact Humberto Rivera-Transit Manager, 520-417-7400, (TTY TYPE YOUR TTY NUMBER HERE); email Humberto.rivera@douglasaz.gov; or visit our administrative office at 1815 9th Street, Douglas AZ 85607. For more information, visit www.douglasaz.gov/283/Public-Transportation.

Complaints may be filed directly with the Arizona Department of Transportation (ADOT) Civil Rights Office. ATTN: Title VI Program Coordinator 206 S. 17<sup>TH</sup> Ave MD 155A 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 **(520) 417-7400**. \*Para información en Español llame: **Humberto Rivera – (520) 417-7400** 

## Non-Discrimination Notice to the Public - Spanish

### Aviso Público Sobre los Derechos Bajo el Título VI Y ADA City of Douglas/Douglas Rides

City of Douglas/Douglas Rides (y sus subcontratistas) 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 Douglas/Douglas Rides, y los procedimientos para presentar una queja, contacte Humberto Rivera-Transit Manager 520-417-7400, (TTY TYPE YOUR TTY NUMBER HERE); o visite nuestra oficina administrativa en 1815 9th Street, Douglas AZ 85607. Para obtener más información, visite www.douglasaz.gov/283/Public-Transportation

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

The above notice is posted in the following locations: Online and in the public areas of the agency's/transit provider's office(s), City Hall, Fire Department, and City Library. This notice is also posted at stations, stops and on transit vehicles.

This notice is posted online at www.douglasaz.gov/283/Public-Transportation

## 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 Douglas/Douglas Rides** 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 Douglas/Douglas Rides** 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 Douglas/Douglas Rides** or submitted to the State or Federal authority for guidance.
- (7) **City of Douglas/Douglas Rides** will notify the ADOT Civil Rights Office of ALL Discrimination complaints within 72 hours via telephone at 602-712-8946; or email at <a href="mailto:civilrightsoffice@azdot.gov">civilrightsoffice@azdot.gov</a>.
- (8) **City of Douglas/Douglas Rides** has **3(three)** business days to investigate the complaint. If more information is needed to resolve the case, the Authority may contact the complainant. The complainant has **3(three)** 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 **3(three)**

- 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 Douglas/Douglas Rides** decision may file a complaint with the Arizona Department of Transportation **(ADOT)** or the Federal Transit Administration **(FTA)** offices of Civil Rights: <u>ADOT</u>: ATTN ADA/Title VI Program Coordinator 206 S. 17<sup>TH</sup> Ave MD 155A RM: 183 Phoenix AZ, 85007 <u>FTA</u>: Attention Title VI Program Coordinator, East Building, 5<sup>th</sup> Floor-TCR 1200 New Jersey Ave., SE Washington DC 20590
- (12) A copy of these procedures can be found online at: www.douglasaz.gov/283/Public-Transportation.

If information is needed in another language, contact **(520) 417-7400**. \*Para información en Español llame: **Humberto Rivera – (520) 417-7400** 

## **Discrimination ADA/Title VI Complaint Form**

Section I:				
Name:				
Address:				
Telephone (Home):	Telephone (Wo	ork):		
Electronic Mail Address:				
Associate Format Base Succession	☐ Large Print		□ Au	dio Tape
Accessible Format Requirements?	☐ TDD		□ Ot	her
Section II:				
Are you filing this complaint on your own behalf	?	☐ Yes*		□ No
*If you answered "yes" to this question, go to <b>Se</b>	ction 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 par	ty:			
Please confirm that you have obtained the perm	ission of the	☐ Yes		□ No
aggrieved party if you are filing on behalf of a third party.				
Section III:				
I believe the discrimination I experienced was based on (check all that apply):				
☐ Race ☐ Color ☐ National Origin ☐ 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 Comp	laint with this	☐ Yes		□ No
agency?		ie:	•	□ INO

Section V:	
	y other Federal, State, or local agency, or with any Federal
or State court?	,
☐ Yes ☐ No	
If yes, check all that apply:	
☐ Federal Agency:	
	State Agency:
	Local Agency:
Please provide information about a co	ontact 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):	
•	ther information that you think is relevant to your complaint. Yo
and date are <b>required</b> below:	
Signature	Date
Please submit this form in person at the a	address helow or mail this form to

City of Douglas/Douglas Rides Humberto Rivera-Transit Manager 1815 9th Street, Douglas AZ 85607 520-417-7400 Humberto.rivera@douglasaz.gov

A copy of this form can be found online at www.douglasaz.gov/283/Public-Transportation

If information is needed in another language, contact (520) 417-7400. \*Para información en Español llame: Humberto Rivera – (520) 417-7400

## Formulario de Queja de Discriminación ADA/Título VI

Sección I:					
Nombre:				1	
Dirección:				2	
Teléfono (Casa)	Teléfono (Casa) Teléfono (Trabajo):				
Dirección de correo electrónico:					
: Paguisitas de formate assesible? ☐ Letra Grande ☐ Cinta de auc			nta de audio		
¿Requisitos de formato accesible?	☐ TDD		□ Ot	ros	
Sección II:					
¿Está presentando esta queja en su propio r	nombre?	□ Sí*		□ No	
*Si respondió "sí" a esta pregunta, vaya a la	Sección III.				
De lo contrario, proporcione el nombre y la					
relación de la persona por la que se queja.					
Por favor, explique por qué ha solicitado a u	n tercero:				
Confirme que ha obtenido el permiso de la p	Confirme que ha obtenido el permiso de la parte agraviada si				
está presentando una solicitud en nombre de un tercero.					
Sección III:					
Creo que la discriminación que experimenté se basó en (verifique todo lo que se aplica):					
☐ Raza ☐ Color ☐ Origen Nacional ☐ Discapacidad					
Fecha de la presunta discriminación (Mes, Día, Año)  Explique lo más claramente posible lo que sucedió y por qué cree que fue discriminado. Describa a todas las personas que estuvieron involucradas. Incluya el nombre y la información de contacto de la(s) persona(s) que lo discriminó (si se conoce), así como los nombres y la información de contacto de cualquier testigo. Si se necesita más espacio, utilice la parte posterior de este formulario.					
Sección IV:					
¿Ha presentado previamente una Queja por ante esta agencia?	Discriminación		Sí	□ No	

En caso afirmativo, proporcione cualquier informació	n de referencia con respecto a su queja anterior.
Sección V:	
¿Ha presentado esta queja ante alguna otra agen	cia federal, estatal o local, o ante algún
tribunal federal o estatal?	
□ Sí □ No	
En caso afirmativo, marque todo lo que correspoi	nda:
☐ Agencia Federal:	
☐ Tribunal Federal:	☐ Agencia Estatal:
☐ Tribunal Estatal :	
Proporcione información sobre una persona de co	ontacto en la agencia / tribunal donde se
presentó la queja.	
Nombre:	
Título:	
Agencia:	
Dirección:	
Teléfono:	
Sección VI:	
El nombre de la queja de la agencia es contra:	
El nombre de la persona que denuncia es en cont	ra:
Título:	
Ubicación:	
Número de teléfono (si está disponible):	
Puede adjuntar cualquier material escrito u otra inform	nación que considere relevante para su queja. Su
firma y fecha son requeridas a continuación:	
Firma	Fecha
- / . 6	

Envíe este formulario en persona a la dirección que aparece a continuación, o envíelo por correo a:

City of Douglas/Douglas Rides Humberto Rivera-Transit Manager 1815 9th Street, Douglas AZ 85607 520-417-7400 Humberto.rivera@douglasaz.gov

Una copia de este formulario se puede encontrar en línea en www.douglasaz.gov/283/Public-Transportation

## Discrimination ADA/Title VI Investigations, Complaints, and Lawsuits

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

☑ City of Douglas/Douglas Rides has not had any ADA nor Title VI Discrimination complaints, investigations, or lawsuits in 2023.

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 Douglas/Douglas Rides** 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 Douglas/Douglas Rides** 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.

Public hearing on February 14, 2024. Public Notice was published on 01/31/2024 and 02/07/2024 Letters were sent out on January 12, 2024 to local transportation providers regarding the City of Douglas / Douglas Rides intent to request 5311 transportation funding.

Transportation Authority Council (TAC) Quarterly Meetings were held JUNE 23, 2022, OCTOBER 11, 2022, MARCH 22, 2023, JULY 13, 2023, OCTOBER 26,2023.

In the upcoming year **City of Douglas / Douglas Rides** will make the following community outreach efforts:

Transportation Authority Council (TAC) Quarterly Meetings will be held **FEBRUARY 2024, MAY 2024, AUGUST 2024**.

Customer Survey was distributed and riders were asked for their participation on **OCTOBER 2023**. Comment Card is provided in all buses and in the Transit office year round. 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 Douglas/Douglas Rides submits to the Arizona Department of Transportation Bi-annually an Application for funding. Part of the annual application is a public notice, which includes a 30-day public comment period.

☑ Expanded the distribution of agency brochures
☑ Posted the Nondiscrimination Public Notices to the following locations:
☑ Within transportation vehicles
$\square$ Pick up and drop off stations
□ Lobby of agency
☑ Hosted public information meetings and or hearings (Please insert the dates these meetings occurred
below)
-Douglas days May 13, 2023- Veterans resource Fair October 10, 2023-TAC meetings, March 22, 2023-July

13, 2023-October 26, 2023.

communicate schedule changes or activities (Please provide a web link here-douglasaz.gov/283/Public Transportation)
$oxed{oxed}$ Updated agency documents/publications to make them more user-friendly e.g. comment forms of agency brochures
☐ List other

Douglas Rides 2023 Encuesta de Atención al cliente				
Pregunta # 1	Con que frecuencia utiliza el camión?			
🔘 1 - 2 veces por	1 - 2 veces por semana 3 - 4 veces por semana			
→ 5 - 6 veces por	r semana 🔘 diario 🦳 ocasionalmente			
Pregunta # 2	Usted se considera			
Adulto	Anciano/Discapacidad Física			
○ Niños(a)/Estud				
Question # 3	Que parada de autobus te gustaria agregar a la Conexion Cochise?			
○ Walmart	Food City			
<ul><li>Safeway</li></ul>	Otro:			
Question # 4	A que campus de Cochise tomas el autobus?			
<ul><li>Douglas</li></ul>	Both			
Sierra Vista	n/a			
Pregunta # 3	Cual es el propósito de usar el camión?			
El Centro	○ Empleo ○ Recreación ○ Educación			
<ul><li>Copper Queen</li></ul>	∪ Wal-Mart			
Question # 6	Siente usted que el servicio cumple con sus necesidades?			
○ Si	○ No			
Question # 7	Como calificaria el servicio al publico?			
	○ Aceptable ○ Bueno ○ Excellente			
Question #8	Adonde te gustaira ir que Douglas Rides no vaya?			
Tucson	Other			
Question # 9	Fue el autobús a tiempo?			
○ Si	○ No			
Question # 10	Estaba limpio el autobús?			
○ Yes	○ No			
Question #11	Fue el despachador servicial y cortés?			
○ Yes	○ No			
Pregunta # 12	¿Con que frequencia utiliza la ruta Cochise Connection?			
odiario diario	Nunca Que es Cochise Connection?			
Por favor proporci	one informacion como podemos mejorar nuestro servicio			
Gracias por to	Gracias por tomar el tiempo de contestar esta encuesta!			

Douglas Rides 2023			
Customer Service Survey			
Question # 1	How often do you ride the bus?		
1 - 2 times a we			
○ 5 - 6 times a we			
Question # 2	What type of rider are you?		
○ Adult	Senior/Disabled		
Child/Student	Student/Cochise College		
Question #3	What bus stops would you like to have added to Cochise Conn.		
○ Walmart	Oathern		
Safeway	Other:		
Question # 4	To which Cochise College campus do you ride the bus to?  Both		
O Douglas	○ n/a		
Sierra Vista	Purpose of trip when you use the bus		
Question # 5	Employment Recreation Education		
O Connor Oycen	Wal-Mart Other:		
Copper Queen Question # 6	Does the service meet your transportation needs?		
[			
Yes	No How would you rate our customer service?		
Question # 7	O Totallana		
O Poor	O Tan		
Question #8	Where do you need to go that Douglas Rides doesn't?		
O Tucson	Benson Other		
Question # 9	Was the bus on time?		
○ Yes	○ No		
Question # 10	Was the bus clean?		
○ Yes	○ No		
Question #11	Was the dispatcher helpful and courteous?		
○ Yes	○ No		
Question # 12	How many times do you use the Cochise Connection route?		
○ 1 - 2 times a w			
odaily	Never What is Cochise Connection?		
Please provide any comments on how we can improve our service			
-1	aking the time to fill out the survey!		
linank you for t	aking the thire to in our the survey.		









TRANSIT DEPARTMENT "DOUGLAS RIDES" PARTICIPATION AT DOUGLAS DAYS EVENT



# City of Douglas/Douglas Rides City of Bisbee/Bisbee Bus Cochise Connection

We will be closed for *Christmas Day/Navidad* a City Holiday on:

Monday (Lunes), December 25<sup>th</sup> (25 de Diciembre)

THE BUSES WILL NOT BE RUNNING ON THIS DAY.

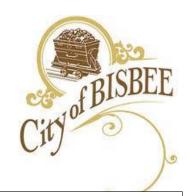
LOS AUTOBUSES <u>NO VAN A CORRER</u> EN ESTE DIA.

Office will be closed (La oficina estara cerrada)

\*\*Services will resume Tuesday, December 26, 2023\*\*

\*\*Los servicios se reanudarán el dia Martes, Diciembre 26, 2023\*\*





## City of Douglas/City of Bisbee Transit Department/Bisbee Bus

We will be observing the City Holiday's on:

Tuesday (Martes), July (Julio) 4th

THE BUSES WILL NOT BE RUNNING ON THESE DAYS.

LOS AUTOBUSES <u>NO VAN A CORRER</u> EN ESTOS DIAS.

Office will be closed (La Oficina estara cerrada):

Tuesday (Martes), July (Julio) 4<sup>th</sup>



## **NOTICE**

Due to Cochise College campus closures,

Douglas Rides and Cochise Connection will be suspending the

stops at the Douglas campus.

Cochise College Douglas campus stop is suspended

Sunday, December 23th, 2023 thru Sunday, January 7th, 2024

Routes will <u>resume</u> Monday, January 8th, 2024.

Debido a los cierres del campus de Cochise College, Douglas Rides y Cochise Connection suspenderán las paradas en el campus de Douglas.

La parada del campus de Cochise College Douglas se suspende de el **Domingo 23 de Diciembre de 2023 hasta el Domingo 7 de Enero de 2024.** 

Las rutas se reanudarán el Lunes 8 de Enero de 2024.

Douglas Rides/Cochise Connection City of Douglas 345 16<sup>TH</sup> Street Douglas, AZ 85607

Date 5/12/2023

It is our pleasure to announce that Douglas Rides-Cochise Connection is moving to a new office location.

### Our new location will be 1815 9<sup>TH</sup> Street, Douglas, AZ 85607.

Please update your records with our new address. We will be **moving on 6/12/2023 and 6/13/2023**. We will be **open for business at our new location on 6/14/2023**. Our phone numbers and email addresses will remain the same, as will our website address and social media accounts.

Our new facility offers us the opportunity to better serve our loyal customers and work with our valuable business partners. We look forward to continuing to serve your needs and work with you at our new location.

Feel free to contact us with any questions.

#### **City of Douglas Transit Department**

Es nuestro placer anunciar el cambio de ubicación de la oficina de Douglas Rides-Cochise Connection.

#### Nuestra nueva ubicación será 1815 Calle 9, Douglas, AZ 85607.

Por favor actualice sus registros con nuestra nueva dirección. Nos **mudaremos los días 12 y 13 de Junio, 2023**. Estaremos **abiertos al público en nuestra nueva ubicación a partir del 14 de Junio, 2023**. Nuestros números telefónicos y correos electrónicos permanecerán sin cambio, así como nuestra dirección web y nuestras cuentas de redes sociales.

Nuestra nueva instalación nos ofrece la oportunidad de proveer servicio a nuestros fieles clientes y colaborar con nuestros valiosos socios comerciales. Esperamos continuar sirviendo sus necesidades y trabajar con todos ustedes en nuestra nueva ubicación.

Por favor comuníquese con nosotros con cualquier pregunta.

#### Departamento de Tránsito, Ciudad de Douglas

## **Limited English Proficiency Plan**

City of Douglas/Douglas Rides 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 Douglas/Douglas Rides 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 Douglas/Douglas Rides**'s extent of obligation to provide LEP services, the **City of Douglas/Douglas Rides** undertook a U.S. Department of Transportation four-factor LEP analysis which considers the following:

 The number or proportion of LEP persons eligible in the City of Douglas/Douglas Rides service area who may be served or likely to encounter by City of Douglas/Douglas Rides program, activities, or service

Persons with Limited English Proficiency (LEP)	Estimate	% of Persons 5 Yrs. & Over	% of Persons 5 Yrs. & Over With LEP
Total Persons 5 years & Over	16,261	100.0%	
English Speaking Only	6,053	30.5%	
Limited English Proficiency	11,299	69.5%	100.0%
Spanish with LEP	10,809	66.5%	62%
Other Indo-European languages with LEP	38	1.2%	15%
Asian & Pacific Island languages with LEP	196	1.2%	15%
Other Languages with LEP	100	0.6%	8%

 The frequency with which LEP individuals come in contact with an City of Douglas/Douglas Rides services;

**City of Douglas/Douglas Rides**'s staff reviewed the frequency with which office staff, dispatchers and drivers have, or could have, contact with LEP persons for **2023**. **City of Douglas/Douglas Rides** averages 100contacts per day.

3) The nature and importance of the program, activities or services provided by the **City of Douglas/Douglas Rides** to the LEP population.

The majority of our ridership is Spanish LEP or prefer to speak Spanish. City of Douglas/Douglas Rides staff's ability to speak both English and Spanish provides the customer service to our riders and making them comfortable in riding the bus.

4) The resources available to **City of Douglas/Douglas Rides** and overall costs to provide LEP assistance. A brief description of these considerations is provided in the following section.

City of Douglas/Douglas Rides transit program provides the transit guide in English and Spanish, including all non-discrimination policies and procedures. The City of Douglas / Douglas Rides also has Spanish speaking drivers and staff available to assist passengers and others who may have limited English proficiency. Every effort will be made to provide vital information to LEP individuals in the language requested all this at no cost to City of Douglas Transit Department.

**City of Douglas/Douglas Rides** 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 Douglas/Douglas Rides** 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 Douglas/Douglas Rides provides language assistance services through the below methods:
  - ☑ Instructions are provided to customer service staff and other **City of Douglas/Douglas Rides** staff who regularly take phone calls from the general public on how to respond to an LEP caller.
  - ☐ 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.
  - ☑ Instructions are provided to vehicle operators, station managers, and others who regularly interact with the public on how to respond to an LEP customer.
  - ⊠ Bilingual or multilingual versions of:
    - □ Safety and security announcements
    - ⊠ Service change announcements
- 2) **City of Douglas/Douglas Rides** has a process to ensure the competency of interpreters and translation service through the following methods:

City of Douglas/Douglas Rides 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 Douglas/Douglas Rides will train the interpreter or translator in specialized terms and concepts associated with the agency's policies and activities. City of Douglas/Douglas Rides 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 Douglas/Douglas Rides 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 Douglas/Douglas Rides** 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.
  - ⋈ Announcements at community meetings
  - □ Information tables at local events
  - ⊠ Signs and handouts available in vehicles and at stations
  - ☑ Announcements in vehicles and at stations
  - □ Agency websites
- 4) City of Douglas/Douglas Rides monitors, evaluates and updates the LEP plan through the following process:

**City of Douglas/Douglas Rides** 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 Douglas/Douglas Rides** will make changes to the language assistance plan based on feedback received.

City of Douglas/Douglas Rides may take into account the cost of proposed changes and the resources available to them. Depending on the evaluation, City of Douglas/Douglas Rides 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 Douglas/Douglas Rides 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 Douglas/Douglas Rides** 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 Douglas/Douglas Rides** will implement processes for training of staff through the following procedures:

City of Douglas/Douglas Rides 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 Douglas/Douglas Rides 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 Douglas/Douglas Rides 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 Douglas/Douglas Rides** will implement LEP training to be provided for agency staff. **City of Douglas/Douglas Rides** staff training for LEP to include:

- A summary of the City of Douglas/Douglas Rides responsibilities under the DOT LEP Guidance;
- A summary of the City of Douglas/Douglas Rides language assistance plan;
- A summary of the number and proportion of LEP persons in the **City of Douglas/Douglas Rides** 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 Douglas/Douglas Rides cultural sensitivity policies and practices.

Sample Agency LEP Documents:

- Welcome Flyer
- Service Interruption due to Holiday Flyer

## 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.

\*Table Depicting Membership of Committees, Councils, Broken Down by Race

Body	Caucasian	Latino	African American	Asian American	Native American
16,976	13%	82%	3%	1%	1%
Transit Advisory Committee	50%	50%	0%	0%	0%

The Transit Advisory Committee is appointed by Mayor with the consent of the Council. The Transit Director/Manager shall be part of the committee membership that shall also include representation from the elderly and disabled community, local businesses, and the medical community. Along with publishing notices, notices for public meetings are posted on buses and by word of mouth the drivers notify riders of meetings and encourage them to participate. Members of all represented demographic groups are encouraged to express interest in being appointed to this committee by completing an interest card, which is available on our website and Transit office.

## Monitoring for Subrecipient Title VI Compliance

Describe how you monitor your subrecipients. This can be through site visits, submissions of Title VI Plans annually, or training and surveys.

☑ **City of Douglas/Douglas Rides** does <u>not</u> monitor subrecipients for Title VI compliance as it does not have any FTA 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 Douglas/Douglas Rides** has no current or anticipated plans to develop new transit facilities covered by these requirements

### **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)

- Vehicle Load for Each Mode Douglas Rides load standard is a maximum vehicle load factor of 1.00
- 2) Vehicle Headway for Each Mode

Fixed route is a single bus route, there are no other buses traveling the route.

3) On Time Performance for Each Mode

Douglas Rides defines a bus as late if it departs the "time point" five or more minutes later than the published time. Buses are considered early if they depart from a published time point at any time prior to the scheduled departure.

4) Service Availability for Each Mode

Douglas Rides will distribute transit service so that 90% of all residents in the service area are within a ¼ mile walk of bus service.

5) Transit amenities for each mode

Proposed Policy:

Transit amenities are distributed on a system-wide basis. Transit amenities include shelters and benches. All buses have the same level of amenities (i.e. air conditioning, wheelchair lift), The location of transit amenities is determined by factors such as ridership, individual requests, staff recommendations, and

6) Vehicle assignments for each mode

Buses are not assigned to specific routes within Douglas Rides service area on vehicle age, but rather to serve specific routes that call for vehicles of differing lengths.

## **Board Approval for the Title VI Plan**