

Title VI Implementation Plan



City of Douglas/Douglas Rides 2022

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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/ACT Connection
- 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 1mile 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.
- Contracts with Advanced Call Center Technologies, a Call Center in Douglas to provide rides to employees to and from work

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 Funds and Planning Funds

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 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 **345 16th 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. 17TH 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 **345 16th 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, City Housing 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 civilrightsoffice@azdot.gov.
- (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: **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.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 (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): _____			
<p>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.</p> <p>_____</p> <p>_____</p> <p>_____</p>			
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 Douglas/Douglas Rides
Humberto Rivera-Transit Manager
345 16th 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

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 **2021**.

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 9, 2022. Public Notice was published on 01/26/2022 and 02/02/2022 Letters were sent out on January 12, 2022 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 Nov. 17, 2020 Mar. 23, 2021 July 28, 2021 Feb. 2, 2022

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

Public hearing for yearly 5311 funding on May 2022

Transportation Authority Council (TAC) Quarterly Meetings will be held May 2022, Sept. 2022, January 2023 & May 2023.

Customer Survey will be distributed and riders will be asked for their participation throughout July 2022.

Comment Card will be found 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

☐ Pick up and drop off stations

☒ Lobby of agency

☒ Hosted public information meetings and or hearings (Please insert the dates these meetings occurred below)

-Transit Day, July 16, 2021-TAC meetings Nov. 17 2021, Mar. 23 2021, Jul. 28 2021, Feb. 2022.

- ☒ Added public interactive content to the agency's webpage for the public e.g. social media, to communicate schedule changes or activities (Please provide a web link here- douglasaz.gov/283/Public-Transportation)
- ☒ Updated agency documents/publications to make them more user-friendly e.g. comment forms or agency brochures
- ☐ List other _____

DOUGLAS TRANSIT DAY
July 16, 2021 | 9:00 AM-2:00 PM
Visitor Center | 345 16th Street

JUMP ON IT!
Learn how to ride the bus and leave the driving to us!

Support Rural Transit in Douglas

Get to know your local bus system
• Sign up/renew your bus pass
• Get to know our buses and staff
• Grab a hotdog and popcorn
• Free Swag!!!

New Bus pass and Renewals will be entered in a raffle to win a tablet!!!

BUSPASS DISTRIBUTION AND RENEWAL FOR ELDERLY (+60) AND DISABLED
MUST PRESENT PICTURE ID AND PROOF OF RESIDENCY



Bus Pass distribution and renewals will be available for Elderly (+60) and Disabled. Must bring picture ID and proof of residency.

Bus Pass renewal will begin July 16, 2021
Douglas Visitor Center | 345 16th Street Douglas AZ, 85607

Beginning July 1, 2021 fare collection will resume for Douglas Rides, Cochise Connection and Bisbee Bus

FARE REINSTATEMENT NOTICE

- Fares must be paid when boarding the bus.
- Exact fare is required to ride.
- Bus pass holders may ride with expired bus pass.
- * All expired bus passes must be renewed by August 16, 2021



FACE MASK REQUIRED.



Federal regulations requires proper wearing of face masks on bus and any transit office. Failure to comply could result in denial of boarding or removal, and may result in penalties.



NOTICE

Pirtleville/Bay Acres and Midtown Routes
have been suspended as of March 23, 2020
Riders may call the office, 520-417-7400 for a call for pick
up or to set up an appointment through our
Dial a Ride route.

Travel will be limited to ESSENTIAL trips


Saturday Midtown route is suspended as of March 28, 2020


Las rutas Pirtleville/Bay Acres y Midtown
han sido suspendidas a partir
del 23 de marzo de 2020

Los pasajeros pueden llamar a la oficina,
520-417-7400 para una llamada para recoger o para poner
una cita a través de nuestra ruta Dial a Ride.

Los viajes se limitarán a viajes ESENCIALES

La ruta Midtown en sabados
se suspende a partir del 28 de marzo de 2020

Douglas Rides Customer Service Survey JANUARY 2022 	
Question # 1	How often do you ride the bus? <input type="radio"/> 1 - 2 times a week <input type="radio"/> 3 - 4 times a week <input type="radio"/> 5 - 6 times a week <input type="radio"/> daily <input type="radio"/> occasionally
Question # 2	What type of rider are you? <input type="radio"/> Adult <input type="radio"/> Senior/Disabled <input type="radio"/> Child/Student <input type="radio"/> Student/Cochise College
Question # 3	Purpose of trip when you use the bus <input type="radio"/> Medical <input type="radio"/> Employment <input type="radio"/> Recreation <input type="radio"/> Education <input type="radio"/> Food City <input type="radio"/> Wal-Mart <input type="radio"/> Downtown <input type="radio"/> JC Penney
Question # 4	Does your service meet your transportation needs? <input type="radio"/> Yes <input type="radio"/> No
Question # 5	Was the driver helpful and courteous? <input type="radio"/> Yes <input type="radio"/> No
Question # 6	How would you rate our customer service? <input type="radio"/> Poor <input type="radio"/> Fair <input type="radio"/> Good <input type="radio"/> Excellent
Question # 7	Was the bus on time? <input type="radio"/> Yes <input type="radio"/> No
Question # 8	Was the bus clean? <input type="radio"/> Yes <input type="radio"/> No
Question #9	How has COVID affected you riding the bus (may choose more than one) <input type="radio"/> Not affected at all <input type="radio"/> I ride the bus less because of COVID <input type="radio"/> Initially I stopped riding the bus, I am now back riding
Question # 10	Where do you need to go that Douglas Rides doesn't? <input type="radio"/> Tucson <input type="radio"/> other :
Question # 11	How many times do you use the Cochise Connection route? <input type="radio"/> 1 - 2 times a week <input type="radio"/> 3 - 4 times a week <input type="radio"/> Occasionally <input type="radio"/> daily <input type="radio"/> Never <input type="radio"/> What is Cochise Connection?
Question # 12	What do you use the Cochise Connection for? <input type="radio"/> Medical <input type="radio"/> Employment <input type="radio"/> Recreation <input type="radio"/> Education
Question # 13	What is the primary route you use? <input type="radio"/> Dial-A-Ride <input type="radio"/> Midtown <input type="radio"/> Pirtleville <input type="radio"/> Cochise Connection <input type="radio"/> Cochise College/Bisbee <input type="radio"/> ACT
Please provide any comments on how we can improve our service	
Thank you for taking the time to fill out the survey!	

<p align="center">Douglas Rides</p> <p align="center">Encuesta de Atención al cliente </p> <p align="center">ENERO 2022</p>	
Pregunta # 1	Con que frecuencia utiliza el camión? <input type="radio"/> 1 - 2 veces por semana <input type="radio"/> 3 - 4 veces por semana <input type="radio"/> 5 - 6 veces por semana <input type="radio"/> diario <input type="radio"/> ocasionalmente
Pregunta # 2	Usted se considera <input type="radio"/> Adulto <input type="radio"/> Anciano/Discapacidad Física <input type="radio"/> Niños(a)/Estudiante <input type="radio"/> Estudiante/Cochise College
Pregunta # 3	Cual es el propósito de usar el camión? <input type="radio"/> Medico <input type="radio"/> Empleo <input type="radio"/> Recreación <input type="radio"/> Educación <input type="radio"/> Food City <input type="radio"/> Wal-Mart <input type="radio"/> El Centro <input type="radio"/> JC Penney
Pregunta # 4	Siente usted que el servicio cumple con sus necesidades? <input type="radio"/> Sí <input type="radio"/> No
Pregunta # 5	El conductor fue servicial y cortes? <input type="radio"/> Sí <input type="radio"/> No
Pregunta # 6	Como calificaria el servicio al publico? <input type="radio"/> Malo <input type="radio"/> Aceptable <input type="radio"/> Bueno <input type="radio"/> Excelente
Pregunta # 7	Estuvo a tiempo el camión? <input type="radio"/> Sí <input type="radio"/> No
Pregunta # 8	Esta limpio el camión? <input type="radio"/> Sí <input type="radio"/> No
Pregunta # 9	Cómo te ha afectado el COVID viajando en el autobús <input type="radio"/> No me afecta en absoluto <input type="radio"/> Me subo menos al autobús por COVID <input type="radio"/> Inicialmente dejé de usar el autobús, ahora estoy de vuelta usandolo
Pregunta # 10	A donde necesita ir que el servicio actual no lo lleva? <input type="radio"/> Tucson <input type="radio"/> Otra: <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/>
Pregunta # 11	¿Con que frecuencia utiliza la ruta Cochise Connection? <input type="radio"/> 1-2 veces por semana <input type="radio"/> 3-4 veces por semana <input type="radio"/> Ocasionalmente <input type="radio"/> diario <input type="radio"/> Nunca <input type="radio"/> Que es Cochise Connection?
Pregunta # 12	¿Cual es la razon que usa la ruta Cochise Connection? <input type="radio"/> Medico <input type="radio"/> Empleo <input type="radio"/> Recreación <input type="radio"/> Educación
Question # 13	Cual es la ruta principal que usted usa? <input type="radio"/> Dial-A-Ride <input type="radio"/> Midtown <input type="radio"/> Pirtleville <input type="radio"/> Cochise Connection <input type="radio"/> Cochise College/Bisbee <input type="radio"/> ACT
Por favor proporcione informacion como podemos mejorar nuestro servicio	
Gracias por tomar el tiempo de contestar esta encuesta!	

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:

- 1) 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%

- 2) 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 **2021**. **City of Douglas/Douglas Rides** averages 100 contacts 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
- COVID Service Change 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 not 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)

1) 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. The location of transit amenities is determined by factors such as ridership, individual requests, staff recommendations, and vendor preference (in the case of shelters which feature advertisements).

6) Vehicle assignments for each mode

All buses have the same level of amenities (i.e. air conditioning, wheelchair lift), available to riders. 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

Once ADOT Civil Rights review of Title VI is completed we will have council approve Title VI for City of Douglas and once approved will upload.