Yuma County Intergovernmental Public Transportation Authority

Title VI Implementation Plan



YCIPTA Executive Board Approved July, 24, 2017

Updated May 28, 2021

Executive Summary | Title VI Implementation Plan

1

Contents

Executive Summary	3
Title VI Policy Statement	4
Title VI Notice to the Public	5
Title VI Notice to the Public -Spanish	6
Discrimination ADA/Title VI Complaint Procedures	7
Discrimination ADA/Title VI Complaint Form	. 10
Discrimination ADA/Title VI Investigations, Complaints, and Lawsuits	. 12
Public Participation Plan	.13
Limited English Proficiency Plan	. 15
Non-elected Committees Membership Table	. 18
Monitoring for Subrecipient Title VI Compliance	. 19
Title VI Training	.20
Title VI Equity Analysis	.21
Fixed Route Transit Provider Analysis	.23
Board Approval for the Title VI Program	.26
Organizational Chart	.27

Executive Summary

The Yuma County Intergovernmental Public Transportation Authority (YCIPTA) formed on December 13, 2010 by the Yuma County Board of Supervisors to administer, plan, operate and maintain public transit services throughout Yuma County, including within the political jurisdictional boundaries of the Cities of Yuma, San Luis, Somerton, Town on Wellton and the unincorporated Yuma County areas.

Yuma County Area Transit (YCAT) is the marketing name for the YCIPTA and the fixed route transit system. YCAT OnCall, formerly known as Greater Yuma Area Dial-A-Ride is the marketing name for the demand responsive transit system. YCAT began in 2002 as a rebranded effort from what was previously known as Valley Transit. Greater Yuma Area Dial-A-Ride began in 1998 and was the county's first public transportation service.

The Yuma Metropolitan Planning Organization (YMPO) had been the administrator of public transit service in Yuma County since 1999 utilizing Federal Transit Administration (FTA) funding that has been available to the Yuma Urbanized Area since 1980 when the urbanized area exceeded 50,000 in population. As of July 2012, YCIPTA is now the administrator of YCAT.

YCAT operates eleven fixed routes, a vanpool program and a demand response service throughout the southwestern quadrant of Yuma County and portions of eastern Imperial County with limited service to El Centro. YCAT generally operates Monday-Friday from 5:50 am to approximately 7:30 pm with headways every 45 to 60 minutes and on Saturday from 9:15 am to 6:30 pm with headways every 60 to 120 minutes. There is no service on Sundays or major holidays at this time. These services are provided under an contractual arrangement with RATP Dev, USA.

National Express is also the contractor for YCAT OnCall beginning July 1, 2017 and Enterprise operating YCAT Vanpool. A total of 38,208 revenue vehicles service hours are operated, this consists of an allocation of 36,000 hours to YCAT and 2,208 hours to YCAT OnCall. YCIPTA is projecting 35 vanpools will operate in FY 2017-2018.

YCAT operates 28 buses. 18 buses are powered by diesel and used on YCAT fixed routes. Ten small buses are powered by gasoline and used on YCAT OnCall and neighborhood YCAT routes. All buses are owned by YCIPTA were purchased with FTA funding.

3

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

- 5310
- 5311
- Other (please explain)_____

Type of Funding Requests? (Select all that apply)

- □ Vehicle Funds
- Operating Funds
- Other (please explain)_____

Non Discrimination Policy Statement

The Yuma County Intergovernmental Public Transportation Authority 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 Yuma County Intergovernmental Public Transportation Authority sponsored program or activity. There is no distinction between the sources of funding.

Yuma County Intergovernmental Public Transportation Authority 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, Yuma County Intergovernmental Public Transportation Authority will take reasonable steps to provide meaningful access to services for persons with limited English proficiency.

When Yuma County Intergovernmental Public Transportation Authority distributes Federalaid funds to another entity/person, Yuma County Intergovernmental Public Transportation Authority will ensure all subrecipients fully comply Yuma County Intergovernmental Public Transportation Authority Title VI Nondiscrimination Program requirements. The YCIPTA Transit Director, Title VI Program Coordinator, will oversee and implement FTA Title VI requirements.

Churthan

Shelly Kreger, Transit Director

Non Discrimination Notice to the Public

Notifying the Public of Rights Under Title VI and ADA Yuma County Intergovernmental Public Transportation Authority

The Yuma County Intergovernmental Public Transportation Authority 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 Yuma County Intergovernmental Public Transportation Authority.

For more information on the Yuma County Intergovernmental Public Transportation Authority's civil rights program, and the procedures to file a complaint, contact Shelly Kreger, Transit Director at (928)539-7076 ext 101, email: or visit our administrative office at 2715 E. 14th St, Yuma, AZ 85365. For more information, visit <u>www.ycipta.org</u>.

A complainant may file a complaint directly with the Arizona Department of Transportation (ADOT) or the Federal Transit Administration (FTA) by filing a complaint directly with the corresponding offices of Civil Rights: <u>ADOT</u>: ATTN: Title VI Program Manager 206 S. 17TH Ave MD 155A RM: 183 Phoenix AZ, 85007 <u>FTA</u>: ATTN: Title VI Program Coordinator, East Building, 5th Floor-TCR 1200 New Jersey Ave., SE Washington DC 20590

If information is needed in another language, contact YCAT (928)539-7076. Para información en Español llame: YCAT (928)539-7076

Non Discrimination Notice to the Public - <u>Spanish</u>

Aviso Público Sobre los Derechos Bajo el Título VI Y ADA Yuma County Intergovernmental Public Transportation Authority

Yuma County Intergovernmental Public Transportation Authority (y sus subcontratistas, si cualquiera) asegura complir 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 provehidos sin consideración a su raza, color, o pais de origen.

Para obtener más información sobre la Yuma County Intergovernmental Public Transportation Authority programa de derechos civiles, y los procedimientos para presentar una queja, contacte **Shelly Kreger, Transit Director at (928)539-7076 ext 101**, (TTY **771**); o visite nuestra oficina administrativa en 2715 E. 14th St, Yuma, AZ 85365. Para obtener más información, visite www.ycipta.org.

El puede presentar una queja directamente con Arizona Department of Transportation (ADOT) o Federal Transit Administration (FTA) mediante la presentación de una queja directamente con las oficinas correspondientes de Civil Rights: ADOT: ATTN Title VI Program Manager 206 S. 17th Ave MD 155A Phoenix AZ, 85007 FTA: ATTN Title VI Program Coordinator, East Building, 5th Floor –TCR 1200 New Jersey Ave., SE Washington DC 20590

The above notice is posted in the following locations: YCAT Office, 2715 E. 14th St., Yuma, AZ, 85365 All vehicles in fleet YCAT/YCIPTA website <u>www.ycipta.org</u> or <u>www.ycat.org</u>.

At a minimum it must be posted online and in the public areas of the agency's/transit provider's office(s). This notice should also be posted at stations, stops, and on transit vehicles

This notice is posted online at <u>www.ycipta.org</u> or www.ycat.org.

⁶ Non Discrimination Notice to the Public -Spanish | **Title VI Implementation Plan**

Non Discrimination 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 Yuma County Intergovernmental Public Transportation Authority, 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 <u>submitted Yuma County Intergovernmental Public Transportation Authority</u> 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 Yuma County Intergovernmental Public Transportation Authority or submitted to the State or Federal authority for guidance.

- (7) Yuma County Intergovernmental Public Transportation Authority will notify the ADOT Civil Rights Office of ALL Discrimination complaints within 72 hours via telephone at 602-712-8946; or email at <u>civilrightsoffice@azdot.gov</u>.
- (8) Yuma County Intergovernmental Public Transportation Authority has 10 days to investigate the complaint. If more information is needed to resolve the case, the Authority may contact the complainant. The complainant has 10 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 10 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 Yuma County Intergovernmental Public Transportation Authority 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. 17TH Ave MD 155A RM: 183 Phoenix AZ, 85007 <u>FTA</u>: 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: <u>www.ycipta.org</u> or www.ycat.org.

If information is needed in another language, contact YCAT office at (928)539-7076. Para información en Español llame: YCAT office at (928)539-7076

Discrimination Complaint Form

Section I:					
Name:					
Address:					
Telephone (Home):	Telephone (Work):				
Electronic Mail Address:					
Accossible Format Paquirements?	□ Large Print		🗆 Audio Tape		
Accessible Format Requirements?	□ TDD		🗆 Other		
Section II:					
Are you filing this complaint on your own behal	?	□Yes*		□No	
*If you answered "yes" to this question, go to Se	ection III.				
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	tv:				
Please confirm that you have obtained the pern	-				
aggrieved party if you are filing on behalf of a th		□Yes		□No	
Section III:					
I believe the discrimination I experienced was based on (check all that apply):					
□ Race □ Color □ Nationa	Color 🛛 National Origin 🗌 Disability				
Date of Alleged Discrimination (Month, Day, Year):					
Explain as clearly as possible what happened an	d why you belie	ve vou we	ere disc	criminated	
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	plaint with this	□Ye	s	□No	
agency?				-	

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?				
\Box Yes \Box 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:
Shelly Kreger, Transit Director (Title VI Coordinator)	
Yuma County Intergovernmental Public Transportation Au	thority
2715 E. 14 th St.	
Yuma, AZ 85365	
(928)539-7076 Ext. 101	
skreger@ycipta.az.gov	

A copy of this form can be found online at <u>www.ycipta.org</u> or <u>www.ycat.org</u>.

11 Discrimination Complaint Form | **Title VI Implementation Plan**

Discrimination Investigations, Complaints, and Lawsuits

This form will be submitted annually. If no investigations, lawsuits, or complaints were filed, a blank form will be submitted.

Description/Name	Date (Month, Day, Year)	Summary (include basis of complaint: race, color, national origin or disability)	Status	Action(s) Taken (Final findings?)
Investigations				
1)				
2)				
Lawsuits				
1)				
2)				
Complaints				
1)				
2)				

☐ Yuma County Intergovernmental Public Transportation Authority has not had any ADA nor Title VI Discrimination complaints, investigations, or lawsuits in 2016.

Yuma County Intergovernmental Public Transportation Authority Public Participation Plan



INTRODUCTION

The Yuma County Intergovernmental Public Transportation Authority (YCIPTA) formed on December 13, 2010 by the Yuma County Board of Supervisors to administer, plan, operate and maintain public transit services throughout Yuma County, including within the political jurisdictional boundaries of the Cities of Yuma, San Luis, Somerton, Town on Wellton and the unincorporated Yuma County areas. Service is also provided on the Cocopah and Fort Yuma Indian Reservations as well as eastern Imperial County, including the unincorporated community of Winterhaven and El Centro, California. As part of this transportation planning process, YCIPTA desires and requests citizen input on the work, projects, and products proposed and created by YCIPTA.

YCIPTA recognizes the importance and necessity of the public participation process.

The following groups govern the activities of YCIPTA:

Within the YCIPTA Board of Directors, there are nine Board Members that consist of City, County, Town, Indian Tribe and educational institutional administrators from the member entities that set the overall policy for the transit system. Each member entity receives one vote on the Board of Directors. When financial contributions are discussed, the Board of Directors has opted towards a weighted voting structure to ensure that members that pay more into the system have fair representation. The Board of Directors meets on the 4th Monday of each month at 1:30 pm at Yuma County Development Services Building inside Aldrich Hall.

All meetings of YCIPTA Board of Directors are open to the public. Members of the public may request time on the agenda of the YCIPTA Board of Directors to comment on specific subjects of interest to the Board Members. A minimum of two weeks advance notice should be given for requested agenda time. Additional subcommittees and working groups may be appointed at any time by YCIPTA Chair to address specific transportation- related topics or areas of interest to YCIPTA.

GOALS AND OBJECTIVES

The public participation process required by 23 CFR 450 should "... provide complete information, timely public notice, full public access to key decisions, and support early and continuing participation of the public in developing plans and Transportation Improvement Programs..."

YCIPTA is committed to the availability of timely, complete information; to the notification of and public access to the decision-making process; and to ongoing public participation throughout the transportation planning process including, but not limited to, the development of the Program of Projects, the Five Year Short Range Transit Plan, the Transportation Improvement Program, review of transit services, fares and operating perimeters and Federal Transit Administration (FTA) civil rights issues such as Title VI, Disadvantage Business Enterprise (DBE), Equal

14 Public Participation Plan | **Title VI Implementation Plan**

Opportunity Program (EEO) and Americans With Disabilities Act (ADA) and the Public Participation Process. Through this Public Participation Process, YCIPTA aims to identify methods for obtaining public input and encouraging public participation in the transportation planning process.

STAKEHOLDERS AND PUBLIC GROUPS

YCIPTA has identified the following groups and individuals as those having potential interest in public input and participation opportunities:

- P Neighborhood organizations;
- Homeowner associations;
- Chamber of Commerce and other business groups;
- Groups representing travel modes transit, bicycle, pedestrian, freight;
- Advocacy groups for the disadvantaged and/or minority groups;
- Media newspapers, television, radio;
- I Governmental agencies;
- Educational Institutions (school districts, community colleges, private schools, State universities;

Organizations or individuals who have been notified of public hearings for major projects, or organizations and individuals who have submitted written comments relating to public hearings for major projects, service changes and plans. These individuals and organizations would remain on the mailing list as long as the major project is under development.

INFORMATION ACCESS

All planning and programming information of YCIPTA is available for public review. The information can be viewed at the YCIPTA Bus Facility, 2715 East 14th Street, Yuma, AZ 85365. Additional information will also be posted online at www.ycipta.az.gov.

OUTREACH TECHNIQUES

Information about all YCIPTA meetings will be added to the existing Public Meeting Calendar that is produced weekly and that is distributed to local newspapers (Yuma Sun, San Luis News, El Noticia and Imperial Valley Press, as well as local radio stations in Yuma and El Centro, and is placed on YCIPTA's website. In addition, the agenda for the meetings will be posted in YCIPTA Bus Facility, each member agency posting boards and on the website, www.ycipta.az.gov, a minimum of twenty-four hours prior to the meetings.

Meeting information will also be included in the YCIPTA's newsletter, Cat Tales, as appropriate. This newsletter is published quarterly and distributed to transit passengers. Regular meetings, as well as special activities related to transit planning, Title VI and project development would be included.

15 Public Participation Plan | **Title VI Implementation Plan**

Press releases to area newspapers, television stations, and radio stations will also be used to notify citizens of upcoming activities of YCIPTA.

YCIPTA maintains an active participation in the local government access cable channel. Programs describing the activities of YCIPTA will be included in the programming.

YCIPTA's website, www.ycipta.az.gov, will be used to provide information about YCIPTA activities including information about the development of the Program of Projects, the Five Year Short Range Transit Plan, the Transportation Improvement Program and Federal Transit Administration (FTA) civil rights documents such as Title VI and others. YCIPTA representatives will be listed along with contact information.

Formal notices for public input meetings are published in the Yuma Sun.

INPUT MECHANISMS

YCIPTA accepts input and comments from the public through a variety of means:

a) YCIPTA's website at www.ycat.az.gov or www.ycipta.az.gov.

- b) By mail to 2715 East 14th Street, Yuma, AZ 85365.
- c) By emailing to skreger@ycipta.az.gov.
- d) By faxing a request or letter to 928.783.0309.

Comment forms can also be obtained at www.ycat.az.gov or www.ycipta.az.gov, by calling 928.539.7076, ext 101 to have one mailed, by emailing a request to skreger@ycipta.az.gov or by faxing to 928.783.0309.

The public may submit comments to their respective YCIPTA Board of Directors members or direct to the Board itself. Comments on YCIPTA services, plans, reports, and programs may be made at public input meetings. YCIPTA ensures that all public input meeting locations are accessible in accordance with the Americans with Disabilities Act (ADA).

Members of the public, or a representative of a group, with expressed comments on a particular topic may request of YCIPTA Chairman an appointment to serve as a citizen representative on an appropriate subcommittee if one is activated.

Interested members of the public will be able to offer input to the committees at a public forum element of each agenda.

YCIPTA will consider and respond to all public input received during the planning and program development processes. If significant written of oral comments are received on transit services, FTA civil rights or plans, a summary, analysis, and report on the disposition of the comments will be made a part of the conclusion of the public participation process.

16 Public Participation Plan | **Title VI Implementation Plan**

SCHEDULE

Notification and announcement of all upcoming public input meetings are made approximately 30 days in advance of the scheduled meeting through the methods described in the Outreach Techniques section of this plan. Legal notice of a scheduled public input meeting is published in the Yuma Sun approximately 30 days prior to the meeting.

Regularly scheduled public input meetings occur on an as needed basis based on specific subject matter such as the development of the Program of Projects, the Five Year Short Range Transit Plan, the Transportation Improvement Program, review of transit services, fares and operating perimeters and Federal Transit Administration (FTA) civil rights issues such as Title VI, Disadvantage Business Enterprise (DBE), Equal Opportunity Program (EEO) and Americans With Disabilities Act (ADA). Other public input meetings are held throughout the year, as necessary.

Updates and revisions to YCIPTA's Public Participation Plan require a 45-day comment period. YCIPTA Board of Directors will approve this document following the completion of the public comment period.

EVALUATION

YCIPTA will review this Public Participation Plan periodically in order to monitor the effectiveness of the procedures outlined in this document. Following evaluation of the outputs and outcomes of the Public Participation Plan, YCIPTA may revise these methods to incorporate new and innovative ways to involve the public in the transportation decision-making process.

CONTACT INFORMATION

YCIPTA believes firmly in the essential role of the public in the transportation planning process, welcoming any and all comments from citizens or groups concerning transportation issues.

YCIPTA may be contacted at the following:

Yuma County Intergovernmental Public Transportation Authority 2715 East 14th Street

Yuma, AZ 85365 Phone: (928) 539-7076 Fax: (928) 783-0309 Website: http://www.ycipta.az.gov Yuma County Intergovernmental Public Transportation Authority 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, Yuma County Intergovernmental Public Transportation Authority made the following community outreach efforts:

YCIPTA Executive Board Meeting – 4th Thursday of each month.

Public Hearings held during board meeting regarding annual budget – yearly

Public Hearings held during board meetings regarding grant applications – yearly

Public Hearing notices in the Yuma Sun as needed as well as community outreach through interviews and PSA. – as needed.

Chamber of Commerce transportation committee meeting on a monthly basis

Public Hearings regarding Fare or Route changes as needed.

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.

Attendance at quarterly Mobility management meetings

City council meeting when transit issues are being discussed as part of the agenda.

Attend Yuma Metropolitan Planning Organization meetings

In the upcoming year Yuma County Intergovernmental Public Transportation Authority will make the following community outreach efforts:

YCIPTA Executive Board Meeting – 4th Thursday of each month.

Public Hearings held during board meeting regarding annual budget – yearly

Public Hearings held during board meetings regarding grant applications – yearly

Public Hearing notices in the Yuma Sun as needed as well as community outreach through interviews and PSA – as needed

Chamber of Commerce transportation committee meeting on a monthly basis

Public Hearings regarding Fare or Route changes as needed.

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.

Attendance at quarterly Mobility management meetings

City council meeting when transit issues are being discussed as part of the agenda.

Attend Yuma Metropolitan Planning Organization meetings

Yuma County Intergovernmental Public Transportation Authority

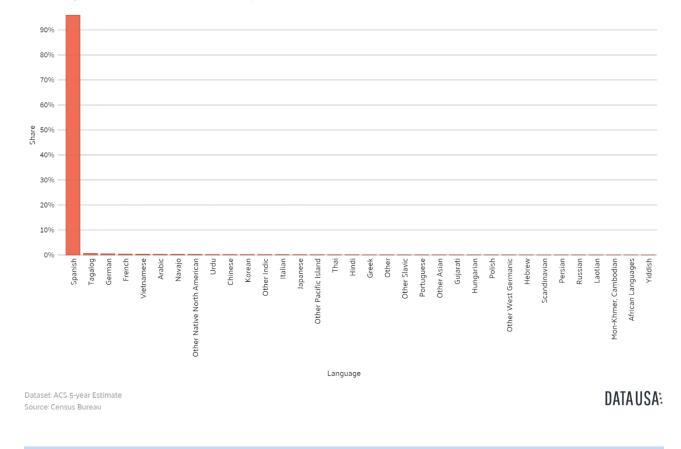
Limited English Proficiency Plan



Yuma County Intergovernmental Public Transportation Authority 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 Yuma County Intergovernmental Public Transportation Authority 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 Yuma County Intergovernmental Public Transportation Authority's extent of obligation to provide LEP services, the Yuma County Intergovernmental Public Transportation Authority 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 Yuma County Intergovernmental Public Transportation Authority service area who may be served or likely to encounter by Yuma County Intergovernmental Public Transportation Authority program, activities, or services;



Non-English Speakers in Yuma County, Az

16 Limited English Proficiency Plan | Title VI Implementation Plan

2) The frequency with which LEP individuals come in contact with a Yuma County Intergovernmental Public Transportation Authority services;

Ridership statistics across all Yuma County Area Transit services from July 1, 2016 – June 30, 2017 indicated a monthly average ridership of 35,243, Saturday average of 2,962.

3) The nature and importance of the program, activities or services provided by the Yuma County Intergovernmental Public Transportation Authority to the LEP population; and

As an agency providing public transportation for the City of Yuma, Somerton, San Luis, Ton of Wellton, Cocopah Indian Tribe, Quechan Indian Tribe, Yuma County, and El Centro, CA, Yuma County Intergovernmental Public Transportation Authority participates heavily in public community outreach and 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.

Transit-related information is available in Spanish and posted on all buses. This information includes fares and policies and where to obtain YCAT passes, Smartcards, and YCAT 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 YCAT would not have life-threatening implications for a LEP individual. It is also believed that denial or delay of access to services or information 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 Yuma County Intergovernmental Public Transportation Authority 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.

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.

Safe Harbor Provision

Yuma County Intergovernmental Public Transportation Authority 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) Title VI Notice
- (2) Complaint Procedures
- (3) 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

Non-elected Committees Membership Table

A subrecipient who selects 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
Population	TYPE %	TYPE %	TYPE %	TYPE %	TYPE %
	HERE%	HERE%	HERE%	HERE%	HERE%
TYPE THE					
NAME OF THE	TYPE %	TYPE %	TYPE %	TYPE %	TYPE %
COMMITTEE	HERE%	HERE%	HERE%	HERE%	HERE%
HERE					
TYPE THE					
NAME OF THE	TYPE %	TYPE %	TYPE %	TYPE %	TYPE %
COMMITTEE	HERE%	HERE%	HERE%	HERE%	HERE%
HERE					
TYPE THE					
NAME OF THE	TYPE %	TYPE %	TYPE %	TYPE %	TYPE %
COMMITTEE	HERE%	HERE%	HERE%	HERE%	HERE <mark>%</mark>
HERE					

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

X Yuma County Intergovernmental Public Transportation Authority does NOT select the membership of anytransit-related committees, planning boards, or advisory councils.

Monitoring for Subrecipient Title VI Compliance

X Yuma County Intergovernmental Public Transportation Authority does NOT monitor subrecipients for Title VI compliance.

Title VI Training

LEP Training and Implementation by YCIPTA Staff

When a new hire starts employment with YCIPTA or its contractor, the LEP policy adopted by the YCIPTA Board of Directors will be provided to the new employee to help understand of the importance to outreach to and communication with limited-English speaking persons.

As new policies/procedures are developed, or existing policies/procedures are amended, these new documents are distributed to affected employees through various methods, including but not limited to paper distribution, electronic documents, postings in employee break rooms, and scheduled group or individual training sessions.

Vehicle operators, who are the most direct point of contact for LEP persons, have several methods to respond to an LEP individual. In many instances, LEP individuals are accompanied by a companion who speaks English and can translate for the customer. In addition, some vehicle operators are bilingual. If vehicle operators are not bilingual, they are instructed to ask for assistance from a bilingual passenger. In the few cases where there is no one on the bus who can offer language assistance, the vehicle operator contacts a dispatcher. Most of YCIPTA dispatchers speak Spanish, and they are available to assist vehicle operators in translating for their customers

Title VI training has been done in several ways. The most common way is through ADOT sponsored training sessions that are given in conjunction with state conferences, such as AzTA Annual conference, or scheduled training that takes place in the various regions that have transit operations as subrecipients to FTA funds through ADOT. Additionally, the various COGs or MPO's will provide training, with ADOT, in their regions that complements the training provided by ADOT.

The most recent training was in February, 2017, in Phoenix, Arizona. Attending were the assistant to the Title VI coordinator and the Title VI coordinator. As a subrecipient of FTA 5311, this session was required for us to continue to receive those funds. During the session, the new template was introduced and new staff at the Civil Rights office for ADOT were also introduced.

All required training for Title VI and 5311 Grants will be attended by the following:

- 1) Title VI Coordinator or the Assistant to the Title VI Coordinator
- 2) Operations Manager
- 3) Additional staff as required.

Currently, we are not aware of any additional training that is upcoming. We will attend any training that is scheduled by ADOT or YMPO (Our regional planning organization) in regard to Title VI or 5311 Grant processes and procedures.

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.

Yuma County Intergovernmental Public Transportation Authority is anticipating plans to develop new transit facility covered by these requirements.

Board Approval for the Title VI Program

ATTACH A COPY OF THE BOARD MEETING MINUTES HERE

Organizational Chart

