
Title VI Implementation Plan

City of Bullhead City, Arizona

Public Transportation

Programs

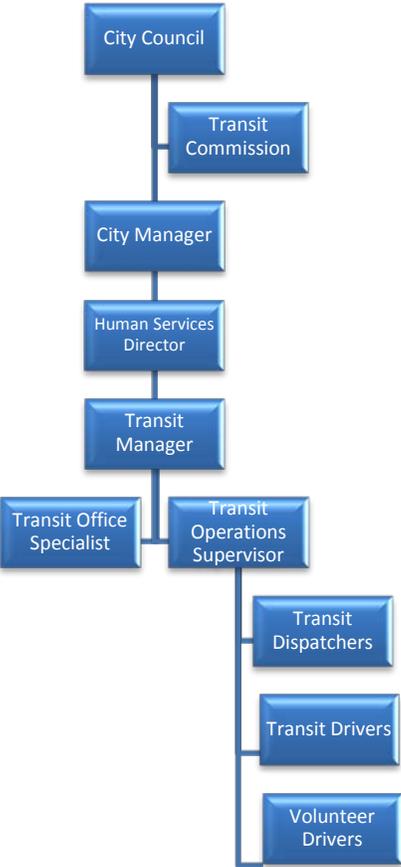
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Executive Summary

The Bullhead Area Transit System has provided services to the local community of Bullhead City, Arizona and surrounding area since 2000. The program is funded in combination by the City of Bullhead City, Federal Transit Administration 5311 grant funds, and local sponsorships. Bullhead Transit operates four fixed routes, a senior demand response service, and complimentary paratransit service Monday through Friday (except some holidays) and limited bus service on Saturdays. Bullhead Area Transit System maintains 72 bus stops in the community and provides hourly service to help our residents and guests travel safely to work, shopping, recreation and medical appointments. The Bullhead Area Transit System is a division of the City of Bullhead City as part of the Human Services Department. The system operates with the help of a Department Director, Transit Manager, Operations Supervisor, Office Specialist, four Dispatching staff, six full time Drivers, and ten part time Drivers.



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

The City 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, The City will take reasonable steps to provide meaningful access to services for persons with limited English proficiency.

When the City distributes Federal-aid funds to another entity/person, The City will ensure all subrecipients fully comply with City Title VI Nondiscrimination Program requirements. The City Manager has delegated the authority to the Transit Manager, Title VI Program Coordinator, to oversee and implement FTA Title VI requirements.



Polly Cotter, City Manager

Non Discrimination Notice to the Public

Notifying the Public of Rights Under Title VI and ADA City of Bullhead City/Public Transportation Programs

The City of Bullhead City/Public Transportation Programs 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 Bullhead City/Public Transportation Programs.

For more information on the City of Bullhead City/Public Transportation Programs' civil rights program, and the procedures to file a complaint, contact **Michael Peluso, Transit Manager at 928-704-2287**, (TTY **928-763-0143**); email transit3@bullheadcity.com; or visit our administrative office at **2355 Trane Road, Bullhead City, AZ 86442**. For more information, visit www.bullheadcity.com.

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: **ADOT**: ATTN: Title VI Program Manager 206 S. 17TH Ave MD 155A RM: 183 Phoenix AZ, 85007 **FTA**: 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 **928-704-2287**. Para información en Español llame: **Michael Peluso Transit Manager, 928-704-2287**

Non Discrimination Notice to the Public - Spanish

Aviso Público Sobre los Derechos Bajo el Título VI Y ADA The City of Bullhead City/Public Transportation Programs

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

Para obtener más información sobre la City of Bullhead City/Public Transportation Programs's programa de derechos civiles, y los procedimientos para presentar una queja, contacte **Michael Peluso, Transit Manager 928-704-2287 Office Phone**, (TTY 928-763-0143); o visite la oficina administrativa en **2355 Trane Road, Bullhead City, AZ 86442**. Para obtener más información, visite **transit3@bullheadcity.com**

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: City Website (www.bullheadcity.com), at the Transit office, and in Transit Vehicles.

This notice is posted online at www.bullheadcity.com

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 City of Bullhead City/Public Transportation Programs (City) 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 the City 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 or submitted to the State or Federal authority for guidance.

- (7) The City 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) The City has 90 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 the 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 a City 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.bullheadcity.com

If information is needed in another language, contact **928-704-2287**. Para información en Español llame: **Michael Peluso, Transit Manager at 928-704-2287**

Discrimination Complaint Form

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

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

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

Section V:

Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?
 Yes No
If yes, check all that apply:
 Federal Agency: _____
 Federal Court: _____ State Agency: _____
 State Court : _____ Local Agency: _____

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

Name: _____

Title: _____

Agency: _____

Address: _____

Telephone: _____

Section VI:

Name of agency complaint is against: _____

Name of person complaint is against: _____

Title: _____

Location: _____

Telephone Number (if available): _____

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

Signature

Date Please

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

City of Bullhead City/Public Transportation Programs
Transit Manager 2355 Trane Road
Bullhead City, Arizona 86442
(928)763-9400
transit3@bullheadcity.com

A copy of this form can be found online at www.bullheadcity.com

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?)
Complaints				
Michael Merritt	04/13/2017	Bullhead Transit was notified of a potential Title VI complaint by ADOT on behalf of FTA who had received two letters from Mr. Merritt regarding an incident that occurred on the bus back in January and alleging discrimination based on his disability. Mr. Merritt explained in his complaint that after the driver abruptly stopped to avoid a collision, he fell out of his mobility device and onto the floor of the bus. Mr. Merritt went on to say he sustained injuries and while on the floor, realized there was an additional seatbelt securement system available on the bus that was never offered to him. Mr. Merritt claims that he asked the driver to utilize that seatbelt system but the driver responded saying he was not trained to do so.	Investigated, Closed	After completing the investigation, it was concluded that at no point during the incident was the passenger discriminated against while using the Bullhead Area Transit System. There were no findings indicating that the driver had discriminated against this passenger or failed to follow proper procedures. Mr. Merritt was sent a letter of closure as this complaint is now considered closed.

Public Participation Plan

Public Participation Plan

City of Bullhead City, Arizona

Public Transportation Programs

The City of Bullhead City/Public Transportation Programs (City) 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, the City has made the following community outreach efforts:

Bullhead Area Transit Commission meets quarterly on the first Monday in February, May, August, and November at 5:30 p.m. in the Council Chambers, unless otherwise noted, and may hold additional work sessions and/or special meetings throughout the year as necessary. The City posts information on all of these meetings on its website including the meeting agendas and minutes. The City also broadcasts the information on its local cable broadcast channel TV4 and replays commission meetings on Saturdays from 11am until 1pm.

In the upcoming year, the City will make the following community outreach efforts:

Over the next year, commission meetings are scheduled to be held on February 5, 2018, and May 7, 2018, August 6, 2018, November 5, 2018. The City posts information on all of these meetings on its website and broadcasts information on its local cable broadcast channel TV4. The City also places document holders with transit bus schedules and route maps at various locations including City Hall, the local Chamber of Commerce, the public library, Laughlin Visitor Center, Mohave Community College, and Western Arizona Regional Medical Center. Any special meetings regarding transit business will have announcements posted inside of buses, and on the City's website. These efforts include information directed towards the local LEP population. Public notices for meetings and inside the vehicle materials all include LEP language and instructions on how to obtain additional information.

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.

The City submits to the Arizona Department of Transportation annually an application for funding. Part of the annual application is a public notice, which includes a 30-day public comment period.

Limited English Proficiency Plan

Limited English Proficiency Plan

City of Bullhead City, Arizona

Public Transportation Programs

The City of Bullhead City/Public Transportation Programs (City) 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 services as required by Executive Order 13166. A Limited English Proficiency person is one who does not speak English as that person’s primary language and who has a limited ability to read, speak, write, or understand English.

This plan details procedure 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, and while determining the City’s extent of obligation to provide LEP services, the City 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’s service area who may be served or likely to encounter the City program, activities, or services;

Subject	Bullhead City city, Arizona				
	Total		Percent of specified language speakers		
			Speak English "very well"		Speak English less than "very well"
	Estimate	Margin of Error	Estimate	Margin of Error	Estimate
Population 5 years and over	37,243	+/-327	92.9%	+/-1.4	7.1%
Speak only English	83.7%	+/-2.2	(X)	(X)	(X)
Speak a language other than English	16.3%	+/-2.2	56.6%	+/-5.4	43.4%
Spanish or Spanish Creole	14.0%	+/-2.0	55.7%	+/-6.4	44.3%
Other Indo-European languages	1.0%	+/-0.6	77.7%	+/-11.7	22.3%
Asian and Pacific Island languages	0.9%	+/-0.4	39.3%	+/-22.3	60.7%
Other languages	0.4%	+/-0.2	73.8%	+/-24.4	26.2%

- 2) The frequency with which LEP individuals come in contact with City services;

Frequency with LEP individuals is higher with driving and dispatching staff, but still relatively low with an average of about one interaction per month. Vital documents for the program, as well as public outreach documents, are made available in Spanish or include information on how LEP individuals can obtain further information.

- 3) The nature and importance of the program, activities or services provided by the City to the LEP population;

Public transportation is a vital asset to the community, including the LEP population. Services are coordinated to provide available transit service intending to meet the needs of the population, which were identified in our 2014 Short Range Transit Plan as transportation to and from shopping, work, social activities, and healthcare to enhance the quality of life and promote a sense of community to residents.

- 4) The resources available to the City and overall cost to provide LEP assistance. A brief description of these considerations is provided in the following section.

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. The City employs several bilingual Spanish-speaking employees that are available to translate or offer assistance. The City also has access to the services of the *Language Line*, which provides on-demand translation services. Notices regarding any service changes or announcements involving the Bullhead Area Transit System are posted in both English and Spanish language inside the transit buses.

Safe Harbor Provision

The City 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, the City will conduct transit 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	81.9%	23.7%	1.3%	1.4%	1.1%
Bullhead Area Transit System Commission	100%	0%	0%	0%	0%

The Bullhead Area Transit System Commission is comprised of five members appointed by the City Council for two-year staggered terms. Members elect a Chairperson and Vice Chairperson annually who shall serve a term of one year. Members shall serve without pay. Postings on the City’s website, on the City’s local cable broadcast channel TV4, and in the local newspaper advertise openings on the commission. Announcements are also made during televised commission meetings if there are any current vacancies on the commission.

City of Bullhead City Public Transportation Program does NOT select the membership of any transit-related committees, planning boards, or advisory councils.

FTA Section 5311 City of Bullhead City/Public Transportation Programs ADA Policies

It is the policy of the City of Bullhead City/Public Transportation Programs to abide by all provisions of the Americans with Disabilities Act (ADA) of 1990 and Section 504 of the Rehabilitation Act of 1973, as amended, including all programs, services, activities, operations and relationships with—and accommodations/modifications of—employees, client-customers, and the general public, including but not limited to those stated below.

The Americans with Disabilities Act of 1990 (ADA) requires that individuals with disabilities receive the same level of service as non-disabled individuals. Services that are “separate but equal” are not acceptable (i.e. all individuals using wheel chairs on one bus and everyone else on another bus). Section 504 prohibits discrimination on the basis of disability in any program or activity receiving Federal financial assistance.

All recipients must keep federally funded equipment and facilities in good operating condition. Recipients must have policies and procedures to maintain vehicles. Recipients must maintain, in operative condition, those features of facilities, vehicles, and other capital equipment that are required to make them accessible. ADA accessibility features must be repaired promptly if they are damaged or out of order. Recipients must establish a system of regular and frequent maintenance checks of lifts sufficient to determine if they are operative.

Specific transportation provisions of the Americans with Disabilities Act (ADA), and Section 504 of the Rehabilitation Act of 1973, as amended, include but are not limited to the following requirements:

Equivalent Service: As required by the Americans with Disabilities Act (ADA), City of Bullhead City/Public Transportation Programs has a sufficient number of, or access to, wheelchair accessible vehicles in our fleet to ensure that individuals needing an accessible vehicle have equivalent access to our transportation services as ambulatory individuals.

Maintenance of Accessible Features on Vehicles: As required by the ADA, the accessible features on our vehicles are maintained inoperative condition so that individuals needing these features receive equivalent service to individuals not needing those features. Accessibility features are repaired promptly if they are damaged or out of order. Drivers are required to report lift and ramp failures promptly.

Transporting and securing wheelchairs: A wheelchair is a mobility aid belonging to any class of three- or more-wheeled devices, usable indoors, designed or modified for, and used by individuals with mobility impairments, whether operated manually or powered. City of Bullhead City/Public Transportation Programs will transport passengers with wheelchairs, even in circumstances when

the wheelchair cannot be secured to the driver's satisfaction, unless the wheelchair exceeds the size or weight capacity of the wheelchair lift or ramp.

Adequate time for Vehicle Boarding and Disembarking: As required by the ADA, City of Bullhead City/Public Transportation Programs provides adequate time for boarding and disembarking our vehicles for individuals with disabilities.

Use of Portable Oxygen/Respirator Equipment: As required by the ADA, individuals using our transportation service may bring respirator, portable oxygen equipment, and/or other life support equipment on board our vehicles, as long as they do not violate the law or rules relating to the transportation of hazardous materials. All equipment must be small enough to fit into our vehicles safely and without obstructing the aisle and/or blocking emergency exits. Passengers must secure the equipment by means such as carrying the equipment using a shoulder strap or securing the equipment to a wheelchair or a seat.

Service Animals: As required by the ADA, any guide dog, signal dogs, or other animal individually trained to work or perform tasks for the benefit of an individual with a disability, including but not limited to, guiding individuals with impaired vision or alerting individuals with impaired hearing, have access to our vehicles. All service animals must be kept under the control of their owner at all times and abides by local animal safety regulations.

Training in Wheelchair Securement, Sensitivity to Passengers: As required by the ADA, City of Bullhead City/Public Transportation Programs trains its personnel to operate vehicles and equipment safely, assist passengers properly, and treat individuals with disabilities who use the service in a respectful and courteous way. A "Certified Trainer" in Passenger Assistance Safety and Security (P.A.S.S.) provides training to personnel prior to being released to drive for City of Bullhead City/Public Transportation Programs.

Driver use of, and assistance with, Accessibility Equipment: As required by the ADA, City of Bullhead City/Public Transportation Programs personnel make use of all available accessibility equipment when needed and provide a reasonable level of assistance to passengers as necessary and upon request with lifts, ramps, and securement devices.

ADA complaints: City of Bullhead City/Public Transportation Programs discrimination related customer service complaints, including those associated with ADA regulations, are reported to ADOT Civil Rights Office and complaint documentation is maintained on file for one year. ADA related service complaint logs are kept on file for five years, per USDOT regulations.

Contact Michael Peluso, Transit Manager, at (928) 704-2287 or at transit3@bullheadcity.com.

Monitoring for Subrecipient Title VI Compliance

X The City of Bullhead City/Public Transportation Programs does NOT monitor subrecipients for Title VI compliance.

Title VI Training

The City of Bullhead City/Public Transportation Programs coordinates training efforts through ADOT and WACOG. As trainings regarding Title VI are made available, all efforts are made for allowing staff to attend. Title VI training has been a component of the annual 5311 ADOT Workshop. For the past four years, The City of Bullhead City/Public Transportation Programs had several staff members including the Transit Manger, the Transit Operations Supervisor and Office Specialist attend these trainings for updates and training regarding Title VI compliance requirements.

Dispatching staff have been trained on recognizing and differentiating Title VI complaints and on the process required for individuals to lodge a complaint. All other transit staff members have been briefed on identifying a Title VI complaint and giving individuals information on how to lodge a complaint.

All staff have also received LEP training and given resources to assist with LEP interactions. Dispatchers, drivers, and administrative staff are trained to contact designated City staff that can assist in translating with LEP individuals. Staff is also trained in the use of the City's language line to assist LEP individuals. All staff are provided introductory LEP training upon hire and attend an annual refresher.

The City of Bullhead City/Public Transportation Programs intends to continue sending staff to the annual 5311 ADOT Workshop that is held in the fall for further Title VI training and to any other opportunities made available in the region.

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.

The City of Bullhead City/Public Transportation Programs (City) has no current or anticipated plans to develop new transit facilities covered by these requirements. No facilities covered by these requirements were developed.

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:

1) *Vehicle Load for Each Mode*

The average ratio of passengers to seats on fixed route service provided by City of Bullhead City/Public Transportation Programs is 3:5. The average ratio for each individual route is as follows:

Red Line – 4:5
Blue Line – 3:5
Green Line - 2:5
Orange Line – 3:5

2) *Vehicle Headway for Each Mode*

Vehicle headways for fixed route service provided by City of Bullhead City/Public Transportation Programs are one hour.

3) *On Time Performance for Each Mode*

The weighted system average of on-time performance for City of Bullhead City/Public Transportation Programs fixed route system is 82 percent which means that 82 percent of all observed departures on all lines departed within zero to five minutes of their scheduled departure time.

4) *Service Availability for Each Mode*

Red Line service hours: 6:00 AM – 7:00 PM

Orange Line service hours: 6:00 AM – 7:00 PM

Blue Line service hours: 6:00 AM – 7:00 PM

Green Line service hour: 6:00 AM – 7:00 PM

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

1) *Transit amenities for each mode*

Trash receptacles are available at most stops, Trash receptacles are on all transit vehicles. Shelters with bench seats are available at our most heavily used stops. Bus stop signs are located at all stops with posted information for those individual stops. Riders guide with route maps are available on all transit vehicles.

2) *Vehicle assignments for each mode*

Vehicles are assigned to routes based on several different factors. Primarily, vehicles are assigned on specific routes based on the replacement schedule for all vehicles so that appropriate mileage can be calculated for when a vehicle will need to be replaced. Vehicles are also assigned to routes in an effort to coordinate vehicle maintenance services making effective use of scheduled services brakes and route end times.

Board Approval for the Title VI Program

RESOLUTION NO. 2018R-27

A RESOLUTION OF THE BULLHEAD AREA TRANSIT SYSTEM COMMISSION OF THE CITY OF BULLHEAD CITY ADOPTING THAT CERTAIN DOCUMENT ENTITLED TITLE VI IMPLEMENTATION PLAN AND AUTHORIZING ITS USE FOR GUIDING THE DELIVERY OF PUBLIC TRANSPORTATION PROGRAMS.

WHEREAS, the Bullhead Area Transit System is a public transit agency that receives federal funds from the Federal Transit Administration (FTA) through the Arizona Department of Transportation (ADOT); and

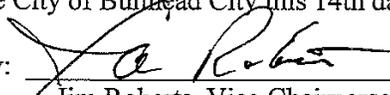
WHEREAS, transit agencies receiving federal funds are required to certify that a policy and complaint process have been established to assure compliance with Title VI of the Civil Rights Act of 1964, Civil Rights Restoration Act of 1987, section 504 of the Rehabilitation Act of 1973, the Americans with Disabilities Act of 1990 (ADA) and related statutes and regulations in all programs and activities; and

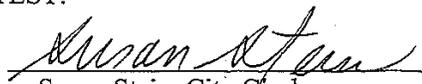
WHEREAS, Title VI requires that “no person shall on the grounds of race, color, national origin, or disability be excluded from the participation in, be denied the benefits of, or be otherwise subjected to discrimination” under City of Bullhead City/Public Transportation Programs or other activity for which ADOT and its sub-recipients receive federal financial assistance; and

WHEREAS, the Bullhead Area Transit System has formulated a Title VI Implementation Plan that provides an operational framework for the implementation of and compliance with Title VI of the Civil Rights Act of 1964, Civil Rights 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 in providing nondiscriminatory public transportation service;

NOW, THEREFORE, BE IT RESOLVED THAT, the Bullhead Area Transit System Commission hereby approves the attached “Title VI Implementation Plan City of Bullhead City, Arizona Public Transportation Programs Updated March 2018” and its use for guiding the delivery of public transportation service.

APPROVED AND AUTORIZED by the Bullhead Area Transit System Commission of the City of Bullhead City this 14th day of May, 2018.

By: 
Jim Roberts, Vice Chairperson

ATTEST:
By: 
Susan Stein, City Clerk
(SEAL)

APPROVED AS TO FORM:
By: 
Garret K. Emery, City Attorney

Organizational Chart

City of Bullhead City, Arizona

Bullhead Area Transit System



FFY 2018-2019