### **Title VI Plan Cover Page**

## City of Coolidge Transit Department 2024

Title VI Contact: Erik Heet (Transit Manager)
Title VI Contact Phone: 520-723-6085
Title VI Contact Email: eheet@coolidgeaz.com
TTY Number (If applicable): 711

Alternate Language Phone: 520-723-7195
Address: 395 W. Palo Verde Ave Coolidge, AZ 85128
Web Address: www.coolidgeaz.com/transit

Para Información en Español: Salvador Rios 520-723-7195

Last Updated: Feb-24

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#### **Executive Summary**

The City of Coolidge Transit Department provides two service routes with FTA 5311 funds. The Cotton Express is our deviated fixed route service within the City of Coolidge (Cotton Express) and Central Arizona Regional Transit (CART) provides regional fixed route intercity bus services (CART) connecting the Town of Florence, Pinal County, City of Coolidge, Central Arizona College (CAC) and the City of Casa Grande. The Cotton Express began operations in 1980 while CART began in 2010. We have been a grant recipient since 1980.

Cotton Express deviated flex route service is provided Monday through Friday from 7:00 am until 8:00 pm. We have two deviated flex routes which serve our central business core. The buses will deviate up to ¼ of a mile off the route so we can reach a large percentage of our residential population. For those individuals who want more assistance, the Cotton Express also offers a demand response service Monday through Friday from 7:00 am until 5:00 pm. The demand response service also provides the opportunity for individuals who live beyond the ¼ mile route deviation to receive services.

CART provides regional bus services to the neighboring communities for employment, education, medical and personal trips. CART is the intercity connector for this area. CART operates Monday through Friday from 5:00 am to 7:00pm. CART is an intercity fixed route.

What t	pe of program fund(s) did you apply for?
	5310 5311 Other (please explain)
Type of	Funding Requests? (Check all that apply)
	/ehicle Funds Operating Funds Other (please explain) <u>Administration</u>
ls your	gency receiving direct funds from FTA?
□If ye	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 Coolidge Transit Department

**City of Coolidge Transit Department** 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 Coolidge Transit Department**.

For more information on the City of Coolidge Transit Department's civil rights program, and the procedures to file a complaint, contact Erik Heet (Transit Manager), 520-723-6085, (TTY 711); email eheet@coolidgeaz.com; or visit our administrative office at 395 W. Palo Verde Ave Coolidge, AZ 85128. For more information, visit www.coolidgeaz.com/transit.

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

If information is needed in another language, contact **520-723-7195**. Para información en Español llame: **Salvador Rios 520-723-7195** 

## Non Discrimination Notice to the Public - Spanish

#### Aviso Público Sobre los Derechos Bajo el Título VI Y ADA City of Coolidge Transit Department

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

Para obtener más información sobre el programa de Derechos Civiles de City of Coolidge Transit Department, y los procedimientos para presentar una queja, contacte Erik Heet (Transit Manager) 520-723-6085, (TTY 711); email eheet@coolidgeaz.com o visite nuestra oficina administrativa en 395 W. Palo Verde Ave Coolidge, AZ 85128. Para obtener más información, visite www.coolidgeaz.com/transit

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: **Coolidge Transit Terminal's public areas, all transit vehicles and in public meeting locations.** 

This notice is posted online at www.coolidgeaz.com/transit

## 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 Coolidge Transit Department** 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 Coolidge Transit Department 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 Coolidge Transit Department or submitted to the State or Federal authority for guidance.

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

If information is needed in another language, contact **520-723-7195**.

Para información en Español llame: Salvador Rios 520-723-7195 ; Email: eheet@coolidgeaz.com

## Discrimination ADA/Title VI Complaint Form

Section I:							
Name:							
Address:							
Telephone (Home):	Telephone (W	ork):					
Electronic Mail Address:							
Accessible Format Requirements?	☐ Large Print		☐ Au	☐ Audio Tape			
Accessible Format Requirements:	☐ TDD		☐ Other				
Section II:							
Are you filing this complaint on your own behalf	?	☐ Yes*		□ No			
*If you answered "yes" to this question, go to <b>Se</b>	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	ty:						
Please confirm that you have obtained the perm	nission of the	☐ Yes		□ No			
aggrieved party if you are filing on behalf of a third party.							
Section III:							
I believe the discrimination I experienced was be	ased on (check a	all that ap	ply):				
☐ Race ☐ Color ☐ National Origin ☐ Disability							
Date of Alleged Discrimination (Month, Day, Yea	nr):		_				
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 IV:							
Have you previously filed a Discrimination Comp	laint with this						
agency?							

If yes, please provide any reference information	regarding your previous complaint.
Section V:	
Have you filed this complaint with any other Fed	eral, 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	on 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 inform	ation that you think is relevant to your complaint.
Your signature and date are <b>required</b> below:	
Signature	Date
Please submit this form in person at the address belo	w, or mail this form to:
City of Coolidge Transit Department	
Erik Heet (Transit Manager)	

City of Coolidge Transit Department Erik Heet (Transit Manager) 395 W. Palo Verde Ave Coolidge, AZ 85128 520-723-6085 eheet@coolidgeaz.com

A copy of this form can be found online at www.coolidgeaz.com/transit

### Formulario de Queja de Discriminación ADA/Título VI

Sección I:								
Nombre:								
Dirección:								
Teléfono (Casa)	Teléfono (Trab	ajo):						
Dirección de correo electrónico:								
: Doguisitos do formato accesiblo?	☐ Letra Grand	le	☐ Ci	☐ Cinta de audio				
¿Requisitos de formato accesible?	☐ TDD		☐ Otros					
Sección II:								
¿Está presentando esta queja en su propio nom	bre?	☐ Sí*		□ No				
*Si respondió "sí" a esta pregunta, vaya a la Sec	ción III.	l						
De lo contrario, proporcione el nombre y la								
relación de la persona por la que se queja.								
Por favor, explique por qué ha solicitado a un te	rcero:							
Confirme que ha obtenido el permiso de la part	e agraviada si	□ Sí		□ No				
está presentando una solicitud en nombre de un tercero.								
Sección III:								
Creo que la discriminación que experimenté se basó en (verifique todo lo que se aplica):								
□ Raza □ Color □ Origen I	Nacional	☐ Dise	canaci	dad				
- Naza - Color - Congent	vacional .		сараск	add				
   Fecha de la presunta discriminación (Mes, Día, A	۱ño)							
Explique lo más claramente posible lo que sucedió y	· ·	fue discri	— minado	o. Describa a todas				
las personas que estuvieron involucradas. Incluya el								
persona(s) que lo discriminó (si se conoce), así como								
cualquier testigo. Si se necesita más espacio, utilice la parte posterior de este formulario.								
Sección IV:								
¿Ha presentado previamente una Queja por Dis	criminación		,					
ante esta agencia?								

En caso afirmativo, proporcione cualquier infor	mación de referencia con respecto a su queja anterior.
Sección V:	
¿Ha presentado esta queja ante alguna otra	agencia federal, estatal o local, o ante algún
tribunal federal o estatal?	
☐ Sí ☐ No	
En caso afirmativo, marque todo lo que cor	responda:
☐ Agencia Federal:	
☐ Tribunal Federal:	Agencia Estata <u>l:</u>
☐ Tribunal Estatal :	🗆 Agencia Local:
	a de contacto en la agencia / tribunal donde se
presentó la queja.	
Nombre:	
Título:	
Agencia:	
Dirección:	
Teléfono:	
Sección VI:	
El nombre de la queja de la agencia es conti	ra:
El nombre de la persona que denuncia es er	n contra:
Título:	
Ubicación:	
Número de teléfono (si está disponible):	
	información que considere relevante para su queja. Su
firma y fecha son requeridas a continuación:	
Firma	Fecha

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

City of Coolidge Transit Department Erik Heet (Transit Manager) 395 W. Palo Verde Ave Coolidge, AZ 85128 520-723-6085 eheet@coolidgeaz.com

Una copia de este formulario se puede encontrar en línea en www.coolidgeaz.com/transit

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

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

☑ City of Coolidge Transit Department has not had any ADA nor Title VI Discrimination complaints, investigations, or lawsuits in 2023.

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

#### **Public Participation Plan**

**City of Coolidge Transit Department** 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 Coolidge Transit Department** 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.

- △ Advertised public announcements through newspapers, fliers, or radio
- ☑ Posted the Nondiscrimination Public Notices to the following locations:

  - □ Lobby of agency
- ☐ Partnered with other local agencies to advertise services provided
- ✓ Hosted an information booth at a community event
   Information Booth Coolidge Public Library (July 2023)
   City of Coolidge Halloween Carnival (October 31, 2023)
- ☐ Updated agency documents/publications to make them more user-friendly e.g. comment forms or agency brochures
- ☑ Uploaded transit routes and schedules to the General Transit Feed Specification (GTFS) system to increase accessibility to the transit system's information. (April 2020, Updated March 2023)

**City of Coolidge Transit Department** will make the following community outreach efforts for the **upcoming year**:

- ☑ Advertise public announcements through newspapers, fliers, or radio
- ☑ Post the Nondiscrimination Public Notices to the following locations:
- ☐ Partner with other local agencies to advertise services provided.
- ☐ Host public information meetings and or hearings.
- Add public interactive content to the agency's webpage for the public e.g. social media, to communicate schedule changes or activities.
- ☑ Update agency documents/publications to make them more user-friendly e.g. comment forms or agency brochures.



CART provides regional bus service between Coolidge, Casa Grande, Florence, and Central Arizona College. CART operates Monday - Friday. This guide includes everything you need to know to get where you need to go on CART.

The map in this guide shows the routing and bus stop locations for the CART bus route. Please note that the bus stops only at the designated stops shown in the map on the reverse side of this guide. Please be at the bus stop five minutes before the scheduled time.

#### **ACCESSIBILITY**

- CART's service is accessible to persons with disabilities:

  Drivers are trained to assist you.

  Drivers provide information on destinations served.

  Buses are accessible to persons in wheekchains.

  Drivers deploy rampol
- Buses have priority seating for seniors and persons with disabilities.
- » Drivers announce stops, including any stop you re-
- quest be announced.

  Persons using portable oxygen and respirators are welcome on buses.

Welcome aboard!

Cowntown Case Grands Fry's Pisza Case Grande Medical Center Central Arzona College Martin Valley Coolidge Transit Terminal

#### **CART FARES**

AGE	ONE- WAY FARE	DAILY FARE	MONTH FARE	CART DAILY	LOCAL & CART MONTH
Children 12 & Under or Students	\$1.00	\$2.00	\$30.00	\$3.00	\$60.00
Adult 13-54	\$2.00	\$4.00	\$60.00	\$6.00	\$90.00
Disabled/ Senior 55 & Up	\$2.00	\$4.00	\$60.00	\$6.00	\$90.00

Children under 5 must be accompanied by an adult.

Exact Fare Only on Buses - No Change will be given

We accept \$20, \$10, \$5, \$1, and quarters. No other

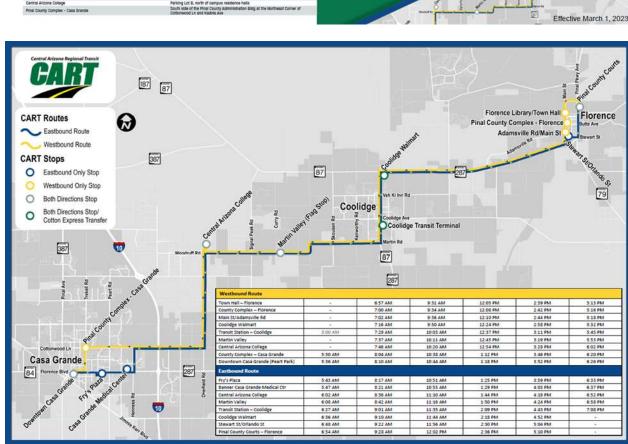
One-Way and Daily fares may be purchased on the bus.

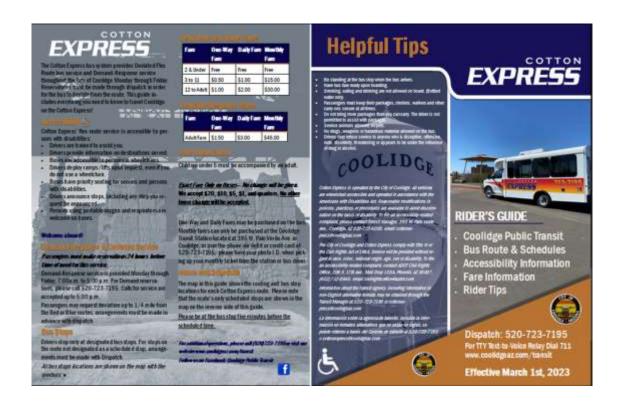
Monthly fares can only be purchased at the Coolidge Transit Station located at 395 W. Palo Verde Ave. in Coolidge: Forms of payment include: Cash, Check, Visa, MasterCard, and Discover.

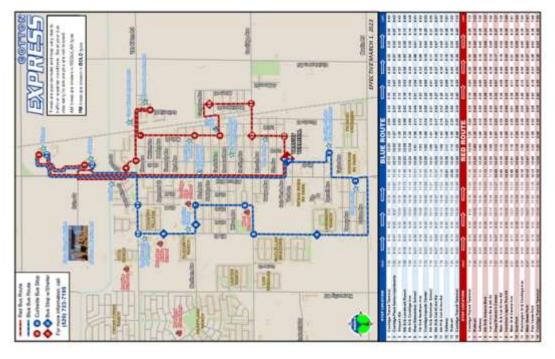
If you purchase a Daily or Monthly Local & CART fare you may use the Cotton Express services for as long as your bus ticket is valid. A CART bus ticket must be purchased to use the express services, no local Cotton Express bus tickets will be accepted on the CART Route.

5th Street and Drysses Street Ry's at Southwest Corner of Reviews Revi and Pottenbaum Rd Class Grance Mestal Center Front Chrisnice Parking Lot 8, morts of campus nestence halls Southwest Corner of You'd Rd and Curry Rd Southwest Corner of You'd Verlay Ave Incl. 4th 3th 3th









#### **Limited English Proficiency Plan**

City of Coolidge Transit Department 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 Coolidge Transit Department 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 Coolidge Transit Department**'s extent of obligation to provide LEP services, the **City of Coolidge Transit Department** 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 Coolidge Transit Department** service area who may be served or likely to encounter by **City of Coolidge Transit Department** program, activities, or services;

Title VI Implementation Plan- Limited English Proficiency Plan	Coolidge city, Arizona			
LANGUAGE SPOKEN AT HOME	Estimate	Percentage		
Total:	13,219	100%		
Speak only English	9,609	72.69%		
Spanish:	3,266	24.71%		
Speak English less than "very well"	822	6.22%		
French, Haitian, or Cajun:	2	0.02%		
Speak English less than "very well"	2	0.02%		
Russian, Polish, or other Slavic languages:	43	0.33%		
Speak English less than "very well"	0	0.00%		
Other Indo-European languages:	90	0.68%		
Speak English less than "very well"	0	0.00%		
Chinese (incl. Mandarin, Cantonese):	15	0.11%		
Speak English less than "very well"	0	0.00%		
Tagalog (incl. Filipino):	30	0.23%		
Speak English less than "very well"	0	0.00%		
Other and unspecified languages:	164	1.24%		
Speak English less than "very well"	0	0.00%		

Source: United States Census Bureau, 2022 American Community Survey Table C16001; https://data.census.gov/table/ACSDT5Y2022.C16001?q=c16001&g=160XX00US0415500

2) The frequency with which LEP individuals come in contact with an **City of Coolidge Transit Department** services;

**City of Coolidge Transit Department**'s staff reviewed the frequency with which office staff, dispatchers and drivers have, or could have, contact with LEP persons for **2023**. **City of Coolidge Transit Department** averages **one** contact per **week**.

- 3) The nature and importance of the program, activities or services provided by the City of Coolidge Transit Department to the LEP population. Transit services are extremely important in a small rural community. Transit services assist in maintaining individual independence. Inclusive community engagement on transit needs and issues ensures that the services we provide are of value to our entire population.
- 4) The resources available to **City of Coolidge Transit Department** and overall costs to provide LEP assistance. A brief description of these considerations is provided in the following section.

**City of Coolidge Transit Department** 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 Coolidge Transit Department** 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 Coolidge Transit Department provides language assistance services through the below methods:
  - ☑ Staff is provided a list of what written and oral language assistance products and methods the agency has implemented and how agency staff can obtain those services.
  - ☑ Instructions are provided to customer service staff and other **City of Coolidge Transit Department** 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
- 2) **City of Coolidge Transit Department** has a process to ensure the competency of interpreters and translation service through the following methods:

City of Coolidge Transit Department 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 Coolidge Transit Department will train the interpreter or translator in specialized terms and concepts associated with the agency's policies and activities. City of Coolidge Transit Department 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 Coolidge Transit Department 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 Coolidge Transit Department** provides notice to LEP persons about the availability of language assistance through the following methods:
  - ☑ Posting signs in intake areas and other points of entry
  - ☑ Statements in outreach documents that language services are available from the agency.
  - ☑ Working with community-based organizations and other stakeholders to inform LEP individuals of the Recipients' services, including the availability of language assistance services
  - □ Announcements at community meetings
  - $\boxtimes$  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 Coolidge Transit Department** monitors, evaluates and updates the LEP plan through the following process:

City of Coolidge Transit Department 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 Coolidge Transit Department will make changes to the language assistance plan based on feedback received. City of Coolidge Transit Department may take into account the cost of proposed changes including staff time, materials, or professional services, and the related resources available to them. Depending on the evaluation, City of Coolidge Transit Department 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 Coolidge Transit Department 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.

Currently, the City of Coolidge utilizes bilingual employees to assist with translation services at no additional cost.

5) **City of Coolidge Transit Department** 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 Coolidge Transit Department** will implement processes for training of staff through the following procedures:

City of Coolidge Transit Department 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 Coolidge Transit Department 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 Coolidge Transit Department 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 Coolidge Transit Department will implement LEP training to be provided for agency staff. City of Coolidge Transit Department staff training for LEP to include:

- A summary of the City of Coolidge Transit Department responsibilities under the DOT LEP Guidance;
- A summary of the City of Coolidge Transit Department language assistance plan;
- A summary of the number and proportion of LEP persons in the City of Coolidge Transit
   Department 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 Coolidge Transit Department cultural sensitivity policies and practices.

#### Non-elected Committees Membership Table

The Coolidge City Code states that "Each board or commission shall as nearly possible have an integrated or balanced membership with representatives of each race, sex and geographic area of the City". To achieve this, advertisements for board/commission positions are place in the local newspaper and distributed to organizations throughout the community. Transit staff posts the advertisement for TAC members on our buses and in our Transit Facility; notices will also be posted on the City of Coolidge website and Coolidge Transit social media platforms moving forward.

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

Body	African American/ Black	American Indian/Ala skan Native	Native Hawaiian/ Other Pacific Islander	Asian	Hispanic/ Latino	White
Population	8.9%	5.4%	0%	0%	44.6%	72.8%
Transit Advisory Committee	28.6%	0%	0%	0%	57.1%	28.6%

# 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 Coolidge Transit Department does <u>not</u> monitor subrecipients for Title VI compliance.

#### **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 Coolidge Transit Department 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

Off peak; 3-1 3 seats per 1 passenger, Peak times; 1-1, 1 seat per 1 passenger

2) Vehicle Headway for Each Mode

Due to variety in route timing, headways on the fixed route's stops range from as short as 16 minutes to as long as 166 minutes. Standard regional loops contain a headway of approximately 166 minutes; these headways decrease when the service's two commuter loops take place.

3) On Time Performance for Each Mode

There are a total of seven (7) complete fixed route runs per day, services consistently run on time (within 0-5 minutes of scheduled time points)

4) Service Availability for Each Mode

Service hours for this fixed route are from 5:00 am to 7:00 pm.

5) Transit amenities for each mode

Indoor seating, shelter, restrooms, signs, maps, schedules, waste receptacles available at Transit Terminal. Buses have schedules, overhead luggage compartments, waste receptacles, and lifts for the disabled. The Coolidge Transit Department's amenities are equally distributed to all of our riders.

6) Vehicle assignments for each mode

All transit buses are placed into service at the Transit Facility Center for all routes.

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

Coolidge's Title VI Plan was approved February 12<sup>th</sup>, 2024.

PLEASE SEE THE FOLLOWING PAGES: