



LAKE HAVASU CITY TRANSIT

TITLE VI PLAN AND IMPLEMENTATION PROGRAM

Amended September 11, 2023

Nondiscrimination in Federally Assisted Programs

Contents

Table of Contents

Introduction	4
Signed Policy Statement.....	5
Title VI Notice to the Public.....	5
Attachment A	6
Title VI Non-Discrimination Policy Statement	6
Attachment B	7
Title VI Notificación.....	7
Title VI / ADA Complaint Procedures	8
Non Discrimination Complaint Procedures	8
Title VI / ADA Complaint Form	8
Complaint Form.....	9
Spanish Complaint Form	11
Title VI / ADA Investigations, Complaints and Lawsuits	13
Discrimination Investigations, Complaints, and Lawsuits.....	13
Investigations	13
Public Participation Plan	15
Stakeholders and Public Groups	16
Information Access.....	16
Outreach Techniques	16
Input Mechanisms.....	17
Schedule	17
Evaluation.....	18
Contact Information	18
Limited English Proficiency Plan LEP	19
Laws and Policy.....	19
Program Responsibility	19
Non-Elected Committees – Commission Membership table (TBD).....	24
Title VI Training Opportunities	24
Title VI Equity Analysis	25
Fixed Route System Standards	27
Standards and Policies for Fixed Route System-wide Service.....	27
Vehicle Load	27
Vehicle Headways	27

On-Time Performance..... 28
Service Availability..... 28
Distribution of Transit Amenities..... 28
Vehicle Assignment 28
Attachment C..... **29**
 Resolution No. 22-3605 29
Attachment D **30**
 Title VI Notification..... 30

Introduction

In accordance with Title VI of the Civil Rights Act of 1964, this program reflects the Lake Havasu City Transit Division's commitment to ensuring that no person shall, on the ground of race, color or national origin be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity provided by Lake Havasu City Transit.

Lake Havasu City has provided services to the local community and surrounding area since 2005. Over the years, the transit programs have been funded by Lake Havasu City, Federal Transit Administration 5310, 5311, 5339, and 5307 grant funds, and local sponsorships. The Lake Havasu City Transit Division is a branch of Lake Havasu City, City Manager's Office

In accordance with the FTA Title VI Circular, Lake Havasu City Transit is required to submit a Title VI Program triennially. The Title VI Program is a compilation of documents, plans, maps, policies, and standards, etc. that demonstrate Lake Havasu City Transit's compliance with Title VI. Guidance provided by FTA, Title VI Circular 4702.1B requires approval of the Lake Havasu City Transit Commission which is the City Council.

Signed Policy Statement

A policy statement signed by the Transit Manager assuring Lake Havasu City Transit's compliance with Title VI of the Civil Rights Act of 1964 is attached as **Attachment A**.

Title VI Notice to the Public

The Lake Havasu City Transit's Title VI Notice to the Public shall be posted at the following locations:

Lake Havasu City Transit Office

Lake Havasu City Transit Meeting Room

On board vehicles operated by Lake Havasu City Transit

The Lake Havasu City website

A copy of the public notice is attached as **Attachment B**.

Attachment A

Title VI Non-Discrimination Policy Statement

Lake Havasu City Transit is committed to complying with the requirements of Title VI in all of its programs and activities. Questions policy assures full compliance with Title VI of the Civil Rights act of 1964 as well as 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. In accordance with Title VI and other civil rights statutes, no person shall on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any Lake Havasu City Transit sponsored program or activity. There is no distinction between the sources of funding.

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

As required in FTA C 4702.18, all sections of the Circular which pertain to FTA recipients from urbanized areas with a population of less than 200,000 are taken into consideration and applied as applicable to this assessment. Lake Havasu City Transit has no sub-recipient(s) and will be a direct recipient of 5307 FTA funds.

Patrick Cipres
Transit Manager-Lake Havasu City

Date

Attachment B

Title VI Notification

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that “no person in the United States shall, on the ground of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.” (42 U.S.C. Section 2000d)

Individuals or organizations who believe they have been denied the benefits of, excluded from participation in, or subject to discrimination on the grounds of race, color or national origin by a recipient of Federal Transit Administration funding can file an administrative complaint with the Federal Transit Administration’s Office of Civil Rights under Title VI of the Civil Rights Act of 1964. Complaints should be signed and include contact information and should be sent to:

Lake Havasu City Transit
900 London Bridge Road
Building B
Lake Havasu City, AZ 86404
Phone: (928) 453-7600

Title VI Notificación

Título VI de la ley de derechos civiles de 1964 prohíbe la discriminación sobre la base de raza, color u origen nacional en programas y actividades que reciban asistencia financiera Federal. Específicamente, título VI estipula que “ninguna persona en los Estados Unidos, por motivos de raza, color u origen nacional, se excluirán de la participación en, negar los beneficios de o ser objeto de discriminación bajo ningún programa o actividad que reciba asistencia financiera Federal.” (42 U.S.C. sección 2000d)

Individuos u organizaciones que creen que se les ha negado los beneficios de, excluido de la participación en, o sujetas a discriminación por motivos de raza, color u origen nacional por un beneficiario de la financiación de la Administración Federal de tránsito puede 7pplicabl una queja 7pplicable7ive con la Administración Federal de tránsito Office of Civil Rights en virtud del título VI de la ley de derechos civiles 1964. Quejas deben firmarse y incluyan información de contacto y deben enviarse a:

Lake Havasu City Transit
900 London Bridge Road
Building B
Lake Havasu City, AZ 86404
Phone: (928) 453-7600

Lake Havasu City Transit

Title VI / ADA Complaint Procedures

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 Lake Havasu City Transit, 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 Lake Havasu City Transit'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 Title VI / ADA administrator can 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 Lake Havasu City Transit Title VI Administrator 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 Lake Havasu City Transit or submitted to the State or Federal authority for guidance.

- (7) Lake Havasu City Transit 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) Lake Havasu City Transits Division has 10 business days to investigate the complaint. If more information is needed to resolve the case, Lake Havasu City Transit 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 Transit Division 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 also be submitted to ADOT within 72 hours of that decision. Letters may be submitted by hardcopy or email.
- (11) A complainant dissatisfied with Lake Havasu City Transit's 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

A copy of these procedures can be found online at: www.lhcaz.gov

Title VI / ADA Complaint Form

Lake Havasu City Transit is committed to ensuring that no person is excluded from participation in or denied the benefits of its services on the basis race, color, or national origin (including Limited English Proficiency), as provided by Title VI of the Civil Rights Act of 1964, as amended, or on the basis of age, sex/gender, ability, gender identity or expression, and sexual orientation as provided by other civil rights statutes. Complaints must be filed within 180 days from the date of the alleged discrimination

The following information is necessary to assist us in processing your complaint. If you require any assistance in completing this form, please call (928) 453-5479. The completed form must be returned to Lake Havasu City Transit, Attn: Title VI Administrator, 900 London Bridge Road, Bldg. B, Lake Havasu City, AZ. 86404 or email: transit@lhcav.gov

See next page for complaint form.

Complaint Form

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

Complaint Form

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? <input type="checkbox"/> Yes <input type="checkbox"/> No If yes, check all that apply: <input type="checkbox"/> Federal Agency: ____ <input type="checkbox"/> Federal Court:____ <input type="checkbox"/> State Agency: ____ <input type="checkbox"/> State Court : ____ <input type="checkbox"/> 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 email this form to: transit@lhcaz.gov

Lake Havasu City Transit, Attn: Title VI Administrator, 900 London Bridge Road, Bldg. B, Lake Havasu City, AZ. 86404

Spanish Complaint Form

Transporte de la Ciudad de Lake Havasu

Forma de Quejas Bajo el Título VI/ADA

Sección I:

Nombre:

Domicilio:

Teléfono (Hogar):

Teléfono (Trabajo):

Domicilio de Correo Electrónico:

¿Requerimientos de Formato Accesible?

Letra Grande

Cinta de Audio

TDD

Otro

Sección II:

¿Está usted llenando esta queja a su propio nombre?

Sí*

No

**Si 11pplica "sí" a esta pregunta, pase a la Sección III.*

Si 11pplica no, por favor provea el nombre y la relación de la persona por quien usted está registrando la queja.

Por favor explique por qué está registrando esta queja por un tercero:

Por favor confirme que usted ha obtenido el permiso de la parte agraviada si está registrando la queja a nombre de un tercero.

Sí

No

Sección III:

Yo creo que la discriminación por la que pasé fue basada en (marque todo lo que sea 11pplicable):

Raza Color Origen Nacional Discapacidad

Fecha de la Presunta Discriminación (Mes, Día, Año): _____

Explique con la mayor claridad 11pplicab lo que sucedió y por qué cree usted que se le discriminó. Describa a todas las personas involucradas. Incluya el nombre y la información de contacto de la/s persona/s que le discriminó/aron (si lo sabe), así como los nombres y la información de contacto de cualquier testigo. Si se necesita más espacio, por favor use la parte posterior de esta forma.

Spanish Complaint Form

Sección VI:		
¿Ha usted registrado previamente una queja de discriminación con esta agencia?	<input type="checkbox"/> Sí	<input type="checkbox"/> No
Si 12pplica "sí", por favor provea cualquier información de referencia con 12pplica a su queja previa.		
Sección V:		
¿Ha usted registrado esta queja con cualquier otra agencia federal, estatal, o local, o con cualquier corte federal o estatal?		
<input type="checkbox"/> Sí <input type="checkbox"/> No		
Si 12pplica "sí", marque todo lo que sea 12pplicable:		
<input type="checkbox"/> Agencia Federal: ____		
<input type="checkbox"/> Corte Federal: _____ <input type="checkbox"/> Agencia Estatal: _____		
<input type="checkbox"/> Corte Estatal : _____ <input type="checkbox"/> Agencia Local: _____		
Por favor provea información sobre la persona contacto en la agencia/corte en la que se registró la queja.		
Nombre:		
Título:		
Agencia:		
Domicilio:		
Teléfono:		
Sección VI:		
Nombre de la agencia contra la cual es la queja:		
Nombre de la persona contra la cual es la queja:		
Título:		
Ubicación:		
Teléfono (si está disponible):		

Usted puede adjuntar cualquier material por escrito o cualquier otra información que usted crea que es relevante para su queja.

A continuación, se requieren su firma y la fecha.

Firma

Fecha

Por favor presente esta forma en persona en el domicilio de abajo, o envíe esta forma por correo electrónico a: <mailto:transit@lhcaz>.

Lake Havasu City Transit, Attn: Title VI Administrator, 900 London Bridge Road, Bldg. B, Lake Havasu City, AZ. 86404

Title VI / ADA Investigations, Complaints and Lawsuits

Discrimination Investigations, Complaints, and Lawsuits

To comply with the requirements of 49 CFR Section 21.9(b), FTA requires all recipients to prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, or national origin: active investigations conducted by the entities other than FTA; lawsuits; and complaints naming the recipient. This list shall include the date that the investigation, lawsuit, or complaint was filed; summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by the recipient in response, or final findings related to, the investigation, lawsuit, or complaint.

Investigations:

- Within 10 business days of receipt of the formal complaint, the Title VI Administrator will notify the complainant and begin an investigation (unless the complaint is filed with an external entity first or simultaneously).
- The investigations will address complaints against the Lake Havasu City Transit Division. The investigation will be conducted in conjunction with and under the advice of the FTA Civil Rights Division.
- The investigation may include discussion(s) of the complaint with all affected parties to determine the problem. The complainant may be represented by an attorney or other representative of his/her own choosing and may bring witnesses and present testimony and evidence in the course of the investigation.
- The investigation will be conducted and completed within 60 calendar days of the receipt of the formal complaint.
- Based upon all the information received, an investigation report will be written by the Title VI Administrator and submitted to the City Attorney's office for review and guidance.
- The complainant will receive a letter stating that final decision by the end of the 60-day time limit. Most investigations are completed within 30 days.
- The complainant shall be notified of his/her right to appeal the decision. Appeals may be made to the Federal Transit Administration, the Arizona Department of Transportation, or the Equal Employment Opportunity Commission.

A copy of these procedures can be found online at: www.lhcaz.gov

The list of complaints and investigations if any since the submission of Lake Havasu City’s Title VI Program from 2010 through 2023 is shown on this table. 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)				

Lake Havasu City Transit

Public Participation Plan

The content and considerations of Title VI, the Executive Order on LEP, and the DOT LEP Guidance shall be integrated into each recipient's established public participation plan, which explicitly describes the proactive strategies, procedures, and desired outcomes that underpin the recipient's public participation activities. Efforts to involve minority and LEP populations in public participation activities can include both comprehensive measures, such as placing notices at all transit stations, stops, and vehicles, as well as targeted measures to address linguistic, institutional, cultural, economic, historical, or other barriers that may prevent minority and LEP persons from effectively participating in a recipient's decision-making process.

INTRODUCTION

Lake Havasu City has provided subsidized public transportation service to citizens in a variety of ways, including Dial-A-Ride in the early years, Curb-to-Curb service for the elderly and disabled, and a fixed route service that began in 2006 and modified as funding changed over the years until 2014. As part of this transportation planning process, Lake Havasu City Transit desires and requests citizen input on the planning, and proposed projects created as a result of the findings from the Lake Havasu City Transit study. Lake Havasu City Transit recognizes the importance and necessity of the public participation process.

At this time the following group and individuals govern the activities of Lake Havasu City Transit until the creation of the Technical Advisory Committee (TAC) and Transit Commission. The Lake Havasu City Council, the Mayor, City Manager, and City Attorney.

All City Council meetings are open to the public. Members of the public may request time on the agenda of the City Council to comment on specific subjects of interest to the City Council. A minimum of two weeks' advance notice should be given for requested agenda time.

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..."

Lake Havasu City Transit 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 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) and the Public Participation Process. Through this Public Participation Process, Lake Havasu City Transit aims to identify methods for obtaining public input and encouraging public participation in the transit planning process.

Stakeholders and Public Groups

Lake Havasu City Transit has identified the following groups and individuals as those having potential interest in public input and participation opportunities:

- Neighborhood organizations;
- Hospital and medical offices;
- 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;
- Governmental agencies; and
- Educational Institutions (school districts, community colleges, private schools, State universities).

Information Access

All planning information of Lake Havasu City Transit is available for public review. The information can be viewed at the Lake Havasu City Transit Dispatch Office, 900 London Bridge Road, B, Lake Havasu City, AZ. 86404. Additional information will also be posted online at www.lhcaz.gov transit page.

Outreach Techniques

Information about all Lake Havasu City Transit meetings will be added to the existing Public Meeting Calendar that is produced weekly and is located on the City’s website. In addition, the agendas for public meetings will be posted at all Lake Havasu City Transit facility buildings and stops.

Meeting information will also be included in the Lake Havasu City Transit newsletter, as appropriate. This newsletter is published quarterly and distributed to transit passengers and on social media. Regular meetings, as well as special activities related to transit planning, Title VI and project development would be included.

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

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

Lake Havasu City web site ww.lhcaz.gov will be used to provide information about Lake Havasu City Transit activities including information about the development of public transit, schedules, and special events. It will also list Federal Transit Administration (FTA) civil rights documents such as Title VI and others. Lake Havasu City Transit representatives will be listed along with contact information.

Formal notices for public input meetings are published on the City and transit website pages, social media and

local newspaper Today's News Herald.

Input Mechanisms

Lake Havasu City Transit accepts input and comments from the public through a variety of means:

- a) Lake Havasu City Transit website at www.lhcaz.gov
- b) By mail to 900 London Bridge Rd, Lake Havasu City, AZ. 86404
- c) By emailing to transit@lhcaz.gov
- d) By faxing a request or letter to 928.854.7702

Comment forms can also be obtained at www.lhcaz.gov or by calling 928.453.7600 to have one mailed, by emailing a request to transit@lhcaz.gov or by faxing to 928.854.7702

The public may submit comments to their respective Lake Havasu City Transit commission members. Comments on Lake Havasu City Transit services, plans, reports, and programs may be made at public input meetings. Lake Havasu City Transit 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 interest or expertise on a particular topic may request of the Lake Havasu City Transit Administrator 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 meeting.

Lake Havasu City Transit will consider and respond to all applicable public input received during the planning and program development processes. If significant written or 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.

Schedule

Notification and announcement of all upcoming Transit public 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 Transit public meeting is published in local newspaper Today's News Herald 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 Transit Study, review of transit services, fares and operating perimeters. Other public input meetings are held throughout the year, as necessary.

Updates and revisions to Lake Havasu City Transit Public Participation Plan require a 45-day comment period. Lake Havasu City Transit Commission will approve this document following the completion of the public comment period.

Evaluation

Lake Havasu City Transit 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, Lake Havasu City Transit may revise these methods to incorporate new and innovative ways to involve the public in the transportation decision-making process.

Contact Information

Lake Havasu City Transit 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.

Lake Havasu City Transit may be contacted at the following:

Lake Havasu City Transit
900 London Bridge Road Bldg. B
Lake Havasu City, AZ. 86404
Phone: (928) 453.5479
Fax: (928) 854.7702
www.lhcaz.gov

Lake Havasu City Transit

Limited English Proficiency Plan LEP

Limited English Proficiency (LEP) is a term used to describe individuals who are not proficient in the English language. Arizona's diverse population makes it critically important Lake Havasu City Transit be innovative and proactive in engaging individuals from different cultures, backgrounds and businesses in planning, project development and other program areas.

Laws and Policy

Executive Order (EO) 13166 – *Improving Access to Services for Persons with Limited English Proficiency* is directed at implementing the protections afforded by Title VI of the Civil Rights Act of 1964 and related regulations. Accordingly, it prohibits recipients of Federal financial assistance from discriminating based on national origin by failing to provide meaningful access to services to individuals who are LEP. This protection requires that LEP persons be provided an equal opportunity to benefit from or have access to services that are normally provided in English.

Program Responsibility

Executive Order (EO) 13166 directs recipients of Federal financial assistance to take reasonable steps to provide limited English proficient individuals with meaningful access to their programs, activities, and services.

Notify LEP customers of the availability of language assistance services LEP persons have the right to language assistance at no cost to them in their spoken language. Language identification cards or posting signs in public areas are methods that can be used to provide notice of the service.

Translation of vital documents in languages other than English

It is appropriate to have written materials that have been historically provided in English to applicants, customers and the general public translated into languages that are regularly encountered. The translation of vital documents into languages other than English is particularly important where a significant number or percentage of the customers served and/or eligible to be served have limited English proficiency. Written materials include electronic documents and websites. Lake Havasu City Transit will indicate on its web site and newspaper publications that translation can be provided, with appropriate notice.

Vital Documents are documents that convey information that critically affects the ability of the recipient/customer to make decisions about his/or her participation in the program or activity. Examples of vital documents include, but are not limited to applications, public notices, consent forms, letters containing important information.

Translating documents for LEP to a fourth (4th) grade literacy level ensures the targeted audience understands the information. Community based organizations or focus groups can assist with testing translations for language and literacy level appropriateness.

Section Five of the US Department of Transportation guidance on LEP requires a four-factor analysis to determine the need for translation services in order to ensure LEP populations are able to receive information about and can participate in the planning process in the language they best understand.

Demography:

According to the U.S. Census Bureau, 2010-2014, American Community Survey five-year estimates, 3.9% of Lake Havasu City Transits area population is considered to be Limited English Proficient. This equates to 2,028 individuals or 3.9% of the population five years of age or older who report speaking English less than “very well.” The predominate language spoken by these individuals is Spanish. Under the Department of Justice’s (DOJ) Safe Harbor provision, it is necessary to translate materials when five percent or 1,000 persons, whichever is less, speak English less than “very well.”

Frequency:

The Transit Division’s policy is to take reasonable steps to provide timely, meaningful access to LEP persons to the services and benefits of the various transportation programs provided to the general public. The intent of this guidance is to suggest a balance that ensures meaningful access by LEP persons to critical services while not imposing undue burdens on the Transit Division.

As the LEP demographic increases and new transit routes and transit related activities increase the Transit Division can provide free language assistance services to LEP individuals whom they encounter or whenever an LEP individual requests language assistance services.

Personnel will inform members of the public that language assistance services are available free of charge to LEP persons and that Lake Havasu City transit personnel will provide these services to them.

The steps taken are in consideration of Department of Transportation, Federal Transit Administrative guidance including, the frequency with which LEP individuals come in contact with the program:

- Information inquiries to the dispatch office through phone or in person. Phone calls into the dispatch office are the primary contact mechanism into the transit department.
- Drivers when on a fixed route weekly
- Complementary para-transit drivers weekly
- Demand response transportation weekly
- Public events or meetings
- Transit stops and kiosks

(2) The Frequency With Which LEP Individuals Come in Contact With the Program, Activity, or Service

Recipients should assess, as accurately as possible, the frequency with which they have or should have contact with LEP individuals from different language groups seeking assistance, as the more frequent the contact, the more likely enhanced language services will be needed. The steps that are reasonable for a recipient that serves an LEP person on a one-time basis will be very different than those expected from a recipient that serves LEP persons daily.

Recipients should also consider the frequency of different types of language contacts, as frequent contacts with Spanish-speaking people who are LEP may require certain assistance in Spanish, while less frequent contact with different language groups may suggest a different and/or less intensified solution. If an LEP individual accesses a program or service on a daily basis, a recipient has greater duties than if the same individual's program or activity contact is unpredictable or infrequent. However, even recipients that serve LEP persons on an unpredictable or infrequent basis should use this balancing analysis to determine what to do if an LEP individual seeks services under the program in question. This plan need not be intricate. It may be as simple as being prepared to use a commercial telephonic interpretation service to obtain immediate interpreter services. Additionally, in applying this standard, recipients should consider whether appropriate outreach to LEP persons could increase the frequency of contact with LEP language groups.

Importance:

Transportation planning is an important facet of the community and affects all residents. All residents are encouraged to participate in public meetings.

Resources:

Due to limited resources and small staff, interpretation and translation services are not available without advance notice; however, public notices are available in English and Spanish.

Based on the four-factor analysis, Lake Havasu City Transit will continue to provide public notices in English and Spanish. Translation and interpretation services will be provided through public online translation sites, bilingual community members and, if not cost prohibit and funds permit, through a language interpretation and translation service. The goal of Lake Havasu City Transit is to engage all community members in transit planning and delivery process.

The Department of Transportation Policy Guidelines give recipients of federal funds substantial flexibility in determining what language assistance is appropriate based upon a local assessment. Due to current financial constraints, translation of large plan documents and maps are considered not warranted at this time. Lake Havasu City Transit will provide translation services, if requested, with 10-days’ notice prior to when the services are needed.

PERSONS WITH LIMITED ENGLISH PROFICIENCY	ESTIMATE	% 5 YEARS & OVER
Total Persons	59,694	100.00%
Total Persons 5 years & Over	57,784	100.00%
English Speaking Only	52,917	91.60%
Speaks English Very Well	3531	6.12%
Persons with Limited English Proficiency LEP	1337	2.31%

Source: U.S. Census Bureau, 2020-2023 American Community Survey (ACS) 5-year estimates ACS data are based on a sample and are subject to sampling variability
 Limited English Proficient (LEP) persons refers to persons age 5 years and over for who English is not their primary language and who have a limited ability to read, write, speak, or understand English. It includes people who reported to the Census they speak English less than very well, not well, or not at all.

Program Areas

- Lake Havasu Transit Plan
- Public Involvement Plan
- Transportation Improvement Plan

These programs are in coordination with the LHMPO.

The Title VI Administrator provides oversight to the program areas through contract reviews and personal interaction to ensure their compliance with Title VI and other nondiscrimination related authorities.

Program Responsibility

Executive Order (EO) 13166 directs recipients of Federal financial assistance to take reasonable steps to provide limited English proficient individuals with meaningful access to their programs, activities, and services.

- *Notify LEP customers of the availability of language assistance services*

LEP persons have the right to language assistance at no cost to them in their spoken language. Language identification cards or posting signs in public areas are methods that can be used to provide notice of the service.

- *Translation of vital documents in languages other than English*

It is appropriate to have written materials that have been historically provided in English to applicants, customers and the general public translated into languages that are regularly encountered. The translation of vital documents into languages other than English is particularly important where a significant number or percentage of the customers served and/or eligible to be served have limited English proficiency. Written materials include electronic documents and websites. Lake Havasu City Transit will indicate on its website and newspaper publications that translation can be provided, with appropriate notice.

Safe Harbor Provision

Lake Havasu City Transit 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, Lake Havasu City Transit will conduct its marketing (including using translated materials) in a manner that reaches each LEP group. Vital Documents include the following:

- (1) Notice of Non-Discrimination and Reasonable Accommodation
- (2) Outreach Materials
- (3) Bus Schedules

- (4) Route Changes
- (5) Public Hearings

Non-Elected Committees – Commission Membership table (TBD)

At this time the Lake Havasu City Council will serve as the Transit Commission until the commission can be created.

BODY	CAUCASIAN	LATINO	AFRICAN AMERICAN	ASIAN AMERICAN	NATIVE AMERICAN
Population					
Committee Name					
Committee Name					
Committee Name					

Monitoring for Sub recipient Title VI Compliance

Lake Havasu City Transit does not have any sub-recipients therefore the Transit Division does not monitor sub recipients for Title VI compliance.

Title VI Training Opportunities

When a new hire starts employment with Lake Havasu City Transit, the LEP policy adopted by Lake Havasu City Transit will be provided to the new employee to help understand of the importance of outreach 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. 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.

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 to FTA funds through ADOT. Additionally, the various COGs or MPOs will provide training, with ADOT, in their regions that complements the training provided by ADOT.

The most recent training was held on site in the transit building in conjunction with PASS (Passenger Safety and Sensitivity) training. The transit manager is a certified trainer for safety, CPR, defensive driving, PASS. The Lake Havasu City Transit manager has facilitated 11 training sessions in FY 2022-2023 as well as attended multiple DOT, FTA, ADOT, and AzTA sponsored trainings.

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

- 1) Title VI Coordinator
- 2) Division 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 FTA or ADOT.

Title VI Equity Analysis

If a direct recipient of 5307 FTA allocations is 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.

Organizational Chart



Fixed Route System Standards

Standards and Policies for Fixed Route System-wide Service

The following describes the mode of service and how service is distributed across the transit system. Lake Havasu City Transit applies the same standards and policies for all its services and does not discriminate on the basis of race, color, or national origin. Lake Havasu City Transit is in the pilot phase of its fixed route THE BRIDGE.

Vehicle Load

The average of all loads during peak operating periods should not exceed vehicle capacity. Please see vehicle capacities below.

Vehicle Type	Average Passenger Capacities		
	Seated	Standing	Total
30' Low Floor Bus	14		14

Vehicle Headways

Lake Havasu City Transit operates Monday through Friday 9:00 am to 2:00 pm and does not operate on weekends. Lake Havasu City Transit operates only within the City limits. Lake Havasu City Transit maintains the same headways/frequency of service for the Hourly and Local service throughout the day.

Service	Headway/Frequency (minutes)			Days of Service	Hours of Service/Day
	Peak*	Off Peak	Evening* *		
<i>Weekday</i>					
Hourly	50 Min.	50 Min.	50 Min.	5	5

On-Time Performance

A vehicle is considered on time when it departs each bus stop no earlier than the scheduled time and no later than 5 minutes after the scheduled time. Lake Havasu City Transit's goal for on-time performance is 75 percent or greater. Lake Havasu City Transit uses an Automatic Vehicle Locator system (AVL) to continuously monitor on-time performance.

Service Availability

Lake Havasu City Transit provides transit service within the downtown corridor of the City, McCulloch Blvd-Mesquite Ave-London Bridge Road- southbound AZ Highway 95-Swanson Ave-Cypress Ave-Acoma Blvd. Within this service area Lake Havasu City Transit distributes transit service so that 75 percent of all residents are within ½ mile of fixed route bus service. Bus stops are evenly distributed along each bus route.

Distribution of Transit Amenities

Installation of benches, shelters, or other bus stop amenities are based on the number of passengers boarding a particular stop. Lake Havasu City Transit is currently in the pilot phase of the fixed route service and has nine locations for boarding and debarking. These locations were based on demographic data and historical data.

Vehicle Assignment

Lake Havasu City Transit does not assign vehicles to a particular route or type of service based on vehicle age or other factors. Vehicles are assigned to a particular route based on the vehicle capacity, ridership demand, and operating characteristics.

Attachment C
Resolution No. 22-3605

Attachment D

Title VI Notification

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that “no person in the United States shall, on the ground of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.” (42 U.S.C. Section 2000d)

Individuals or organizations who believe they have been denied the benefits of, excluded from participation in, or subject to discrimination on the grounds of race, color or national origin by a recipient of Federal Transit Administration funding can file an administrative complaint with the Federal Transit Administration’s Office of Civil Rights under Title VI of the Civil Rights Act of 1964. Complaints should be signed and include contact information and should be sent to:

Lake Havasu City Transit
900 London Bridge Road
Building B
Lake Havasu City, AZ 86404
Phone: (928) 453-7600

Transporte de la Ciudad de Lake Havasu

Notificación del Título VI

El Título VI del Decreto de Derechos Civiles de 1964 prohíbe la discriminación basada en raza, color u origen nacional en programas y actividades recibiendo asistencia financiera Federal. Específicamente, el Título VI estipula que “ninguna persona en los Estados Unidos deberá, por motivos de raza, color u origen nacional, ser excluida de la participación en, denegada de los beneficios de, o verse sujeta a la discriminación bajo cualquier programa o actividad recibiendo asistencia financiera Federal.” (Código 42 U.S.C. Sección 2000d)

Los individuos u organizaciones que crean que se les han denegado los beneficios de, excluido de la participación en, o se hayan visto sujetos a discriminación por motivos de raza, color u origen nacional por un receptor de fondos de la Administración Federal de Transporte puede registrar una queja administrativa con la Oficina de Derechos Civiles de la Administración Federal de Transporte bajo el Título VI del Decreto de los Derechos Civiles de 1964. Las quejas deben firmarse e incluir información de contacto y deben enviarse a:

Lake Havasu City Transit
900 London Bridge Road
Building B
Lake Havasu City, AZ 86404
Teléfono:(928) 453-7600