



NAIPTA
Title VI Program
and Implementation Plan

Effective July 1, 2015 thru June 30, 2018

Updated August 3, 2017



Title VI Program

Executive Summary

Northern Arizona Intergovernmental Public Transportation Authority (NAIPTA) is an independent special district that is responsible for providing public transportation services in Northern Arizona, specifically in the City of Flagstaff, on Northern Arizona University campus, and in parts of Coconino County. NAIPTA has been providing these programs since 2006. NAIPTA has been a grantee of federal funds since 2006 and uses a combination of various federal funds, including section 5304, 5307, 5310, 5311, and 5339, and matching funds from our partner agencies to provide services.

NAIPTA is led by our CEO – and General Manager who reports to our Board of Directors. Our Board of Directors is made up of appointed and elected officials from our partners as required by statutes that allowed for the creation of an Intergovernmental Public Transportation Authority. The CEO-General Manager carries out the directives of the Board and our Partners with a Deputy General Manager, Administrative Director, and Operations Director. The Deputy General Manager oversees the planning functions of the agency as well as information technology and facilities. The Administrative Director oversees finance, human resources, and federal compliance. The Operations Director oversees the operations division, including fixed route, paratransit, fleet, and training.

Title VI (codified at 42 U.S.C §2000d et seq.) was enacted as part of the landmark Civil Rights Act of 1964 signed by President Lyndon B. Johnson. It prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance.

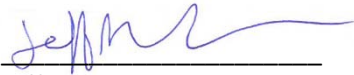
In accordance with the FTA Title VI Circular, NAIPTA is required to submit a Title VI Program triennially. The Title VI Program is a compilation of documents, plans, maps, policies and standards, etc. that demonstrate NAIPTA's compliance with Title VI. Guidance provided by FTA Title VI Circular 4702.1B requires approval of NAIPTA's Title VI Program by its Board of Directors.

Non-Discrimination Policy Statement

The NAIPTA 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 statues, no person shall on the grounds of age, sex/gender, ability, race, color, national origin, gender identify or expression, and sexual orientation be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any NAIPTA sponsored program or activity. There is no distinction between the sources of funding.

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

When NAIPTA distributes Federal-aid funds to another entity/person, NAIPTA will ensure all sub-recipients fully comply with NAIPTA Title VI Non-Discrimination Program requirements. The CEO-General Manager has delegated the authority to Administrative Director, Title VI Program Coordinator, to oversee and implement FTA Title VI requirements.



Jeff Meilbeck,
CEO-General Manager

The Table of Contents was created from FTA Title VI Circular 4702.1B, Appendix A-1: Title VI Program Checklist.

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I. General Requirements

Section 1: Title VI Notice to the Public, Including a List of Locations Where Posted

Title 49 CFR Section 21.9(d) requires recipients to provide information to the public regarding the recipient's obligations under DOT's Title VI regulations and apprise members of the public of the protections against discrimination afforded to them by Title VI. At a minimum, recipients shall disseminate this information to the public by posting a Title VI notice on the agency's website and in public areas of the agency's office(s), including the reception desk, meeting rooms, etc. Recipients should also post Title VI notices at stations, stops, and/or on transit vehicles. The notices shall be translated into languages other than English, as needed and consistent with the DOT LEP Guidance and the recipient's language assistance plan.

Title VI Notices and Locations



Non-Discrimination Notice to the Public

Know your Rights

Northern Arizona Intergovernmental Public Transportation Authority (NAIPTA) operates its programs and services without regard to age, sex/gender, ability, race, color, national origin, gender identify or expression, and sexual orientation in accordance with Title VI and other civil rights statutes. To request additional information on NAIPTA's Title VI and other anti-discrimination obligations or if information is needed in languages other than English, please contact NAIPTA Customer Service Center at:

phone (928) 679-8900

TTY (800) 367-8939

fax (928) 779-6868

email transportation@naipta.az.gov

Any person who believes that he or she has been subjected to discrimination under Title VI or other civil rights statutes may file a complaint with NAIPTA.

Complaints must be filed within 180 days of the alleged discriminatory act. Please call NAIPTA Administrative Director or submit your complaint in writing to the Civil Rights Division using the contact information below:

<http://mountainline.az.gov/naipta-information/customer-rights/>

NAIPTA Civil Rights Division
Attn: Administrative Director
3773 N Kaspar Dr
Flagstaff, AZ 86004

Ph: (928)679-8908
Email: hdalmolin@naipta.az.gov

Complaints may also be filed directly with the Federal Transit Administration at www.fta.dot.gov; the Arizona Department of Transportation Civil Rights Office at <http://azdot.gov/business/civil-rights/contact-us-new>; or Equal Employment Opportunity Commission at www.eeoc.gov. Please review information on the respective agency websites for details on filing Title VI complaints.

If information is needed in another language, please contact NAIPTA's Customer Service Center at (928) 679-8900.

Si necesita informacion en Espanol, por favor comuniquese con el Departamento de Servicio al Cliente de NAIPTA al (928) 679-8900.



Aviso de no discriminación al público

Conozca sus derechos

La Autoridad Intergubernamental de Transporte de Arizona del Norte (NAIPTA, por sus siglas en inglés) brinda sus programas y servicios sin tener en cuenta la edad, el sexo/género, la capacidad, la raza, el color, la nacionalidad, la expresión o la identificación de género ni la orientación sexual según el Título VI y otros estatutos de derechos civiles. Para pedir más información sobre el Título VI de NAIPTA y otras obligaciones antidiscriminación o en caso de que necesite esa información en otros idiomas distintos del inglés, contacte al Departamento de Servicio al Cliente de NAIPTA al:

Teléfono (928) 679-8900

TTY (800) 367-8939

Fax (928) 779-6868

Correo electrónico transportation@naipta.az.gov

Cualquier persona que crea que haya sido víctima de discriminación bajo el Título VI u otros estatutos de derechos civiles podrá presentar una queja a NAIPTA.

Las quejas deben presentarse dentro de los 180 días del acto de supuesta discriminación. Llame al Director Administrativo de NAIPTA o envíe su queja por escrito a la División de Derechos Civiles con la siguiente información de contacto:

<http://mountainline.az.gov/naipta-information/customer-rights/>

División de Derechos Civiles NAIPTA
Attn: Director Administrativo
3773 N Kaspar Dr
Flagstaff, AZ 86004

Tel.: (928)679-8908

Correo electrónico: hdalmolin@naipta.az.gov

Las quejas también se pueden presentar a la Administración Federal del Tránsito en www.fta.dot.gov; a la oficina del Departamento de Derechos Civiles en el Transporte en <http://azdot.gov/business/civil-rights/contact-us-new>; o a la Comisión de Igualdad de Oportunidades en www.eeoc.gov. Revise la información en las respectivas páginas web de las agencias para consultar los detalles de la presentación de quejas en el Título VI.

Si necesita información en otro idioma, contacte al Departamento de Servicio al Cliente de NAIPTA al (928) 679-8900.

Si necesita información en Español, por favor comuníquese con el Departamento de Servicio al Cliente de NAIPTA al (928) 679-8900.



Non-Discrimination Notice to the Public

List of Locations Where Posted

Transit Centers/Administrative Offices:

1. Mall Connection Center, Mall Way
2. Downtown Connection Center, Phoenix Ave
3. NAIPTA Main Office, Kaspar Drive

Section 2: Discrimination Complaint Procedure

In order to comply with the reporting requirements established in 49 CFR Section 21.9(b), all recipients shall develop procedures for investigating and tracking Title VI complaints filed against them and make their procedures for filing a complaint available to members of the public. FTA requires direct and primary recipients to report information regarding their complaint procedures in their Title VI Programs in order for FTA to determine compliance with DOT's Title VI regulations.

NAIPTA's complaint process and form are professionally translated into languages as recognized as vital to our services in our Limited English Proficiency Plan. NAIPTA used FMPO data, American Community Survey data and community outreach to identify the languages during the development of its Limited English Proficiency Plan.

Discrimination Complaint Process



Complaint Process

NAIPTA 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.

NAIPTA's objective is to:

- Ensure that the level and quality of transportation service is provided without regard to age, sex/gender, ability, race, color, national origin, gender identify or expression, and sexual orientation;
- Promote the full and fair participation of all affected populations in transportation decision making;
- Prevent the denial, reduction, or delay in benefits related to programs and activities that benefit minority populations or low-income populations;
- Ensure meaningful access to programs and activities by persons with limited English proficiency.

Northern Arizona Intergovernmental Public Transportation Authority (NAIPTA) grants all citizens equal access to all its transportation services. It is further the intent of NAIPTA, that all citizens are aware of their rights to such access. This information is to serve as an educational tool for citizens so that they may understand one of the civil rights laws that protect their benefit of NAIPTA programs and services, specifically, as it relates to Title VI of the Civil Rights Act of 1964.

What is Title VI

Title VI is a section of the Civil Rights Act of 1964 requiring that "No person in the United States shall on the grounds 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." Note that Title VI does not address age, ability, sex/gender, gender identity or expression, or sexual orientation discrimination. It only covers race, color and national origin. Other Civil Rights laws, including state and local regulations prohibit these forms of discrimination.

Who are Limited English Proficient Persons?

Persons who do not speak English as their primary language and who have limited ability to read, speak, write, or understand English can be limited English proficient, or "LEP." These individuals may be entitled to language assistance with respect to a particular type of service, benefit, or encounter.

Different treatment based on a person's inability to speak, read, write, or understand English may be a type of national origin discrimination.

For more information

To request additional information on NAIPTA's Title VI and other anti-discrimination obligations or if information is needed in languages other than English, please contact NAIPTA Civil Rights Division or NAIPTA's Administrative Director at:

- phone (928) 679-8900
- TTY (800) 367-8939
- fax (928) 779-6868
- email transportation@naipta.az.gov

How do I file a complaint?

If you believe that you have received discriminatory treatment by the NAIPTA on the basis of your age, sex, ability, race, color, national origin, gender identity/expression, and sexual orientation, you have the right to file a complaint with the NAIPTA Administrative Director in the Civil Rights Division. The complaint must be filed no later than 180 calendar days of the alleged discriminatory incident.

Methods of filing a Complaint

The preferred method is to file your complaint in writing using the Title VI Complaint Form, and sending it to:

NAIPTA Civil Rights Division
Attn: Administrative Director
3773 N Kaspar Dr
Flagstaff, AZ 86004

Or via email to hdalmolin@naipta.az.gov

Complaints must include the complainant(s) name, address, and phone number. The complaint must be signed by the complainant(s). For complaints submitted via email, the email address and complainant(s) name will be treated as the complainant(s) signature.

Verbal complaints will be accepted and transcribed by the Civil Rights Division. To make a verbal complaint, call (928) 679-8908. Complainant(s) will receive a copy of transcribe complaint for verification and the complainant(s) must return a signed copy to initiate an investigation.

All complaints will be acknowledged in writing within 3 business days of the receipt of the signed complaint and the acknowledgement will include whether the complaint is to be investigated by NAIPTA or referred to external entities.

Complaints may also be filed with external entities the Federal Transit Administration at www.fta.dot.gov; the Arizona Department of Transportation Civil Rights Office at <http://azdot.gov/business/civil-rights/contact-us-new>; or Equal Employment Opportunity Commission at www.eeoc.gov. Please review information on the respective agency websites for details on filing Title VI complaints.

Should a complaint be filed with NAIPTA and an external entity simultaneously, the external complaint shall supersede the NAIPTA complaint and the NAIPTA's complaint procedures will be suspended pending the external entity's findings.

Should NAIPTA receive a complaint related to NAIPTA's program provided through Arizona Department of Transportation Section 5310 or 5311 funding, specifically vanpools or taxi vouchers, NAIPTA will notify ADOT within 72 hours via telephone at 602.712.8946; or email at civilrightsoffice@azdot.gov.

Investigations

Within 10 working days of receipt of the formal complaint, the Administrative Director 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 any NAIPTA department(s). The investigation will be conducted in conjunction with and under the advice of the 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 days of the receipt of the formal complaint.

Based upon all the information received, an investigation report will be written by the Administrative Director for submittal to the CEO – General Manager.

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: <http://mountainline.az.gov/naipta-information/customer-rights/>.



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Updated: July 21, 2017

Policy: Process for Public Comment and Complaint

Goal: Establish a guideline and process for handling public comments and complaints, as well as mechanism for tracking and investigation.

Contact: Heather Dalmolin OR Alicia Becker
 928.679.8908 OR 928.679.8935
hdalmolin@naipta.az.gov OR abecker@naipta.az.gov

Receiving Comments or Complaints

NAIPTA receives various types of comments and complaints. This procedure recognizes each type and assigns related process by type.

General Comments and Complaints, including complaints regarding violations under Title VI (Discrimination complaints):

1. The public comment hotline will be provided 24 hours a day for citizens with questions, comments, or complaints. The hotline number is posted on all vehicles and made available to the public on printed schedules and on website.
2. Calls will be taken during regular business hours by Operations Supervisors in the dispatch office or Administrative Staff at the front desk.
3. An email address will be provided on NAIPTA website through both the Contact Us link and the Customer Rights page. Access to Customer Rights page will be provided through a link on every page within the NAIPTA website. The email address is also made available on vehicles and in NAIPTA facilities on the Customer Rights/Title VI notice.
4. Public Comment cards are available in the office and on the buses. The cards are removed from locked comment boxes at the end of each service day and submitted to Administrative Staff at the front desk.
5. All comments/complaints will be investigated by senior level staff with contact made to caller within 2 business days as applicable.
6. All comments/complaints will be recorded in the Comments and Complaints database. Detailed description of comment should be obtained with date, time and location of incident as well as caller's name/number if possible.
7. All investigation notes will be entered into the database, along with resolution of comment or complaint. Investigations and complaints are to be marked closed at resolution.
8. The Administrative Director will report to the management team all open comments & complaints as well as complaints closed within the period on a quarterly basis. Management may make recommendations on additional actions, including training to respective supervisors based on trends or reoccurring complaints.
9. All Title VI complaints will be handled as per the Title VI Policy, Section 2 Title VI Complaint Procedure. Title VI complaints are defined as complaints regarding denial of benefits, exclusions of participation, or subjection to discrimination on the grounds of race, color, or national origin. As per state and local regulations, Title VI discriminatory complaints include



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discrimination based on age, ability, sex/gender, gender identity or expression, or sexual orientation. As deemed necessary, Title VI complaints are subject to discussion with Board of Directors.

10. All documents regarding Title VI complaints, including print out of complaint from database and closing letter will be maintained in the Title VI file with the Administrative Director.
11. All complainants will be offered an opportunity to participate in public meetings conducted by the Board of Directors.

** All comments and complaints whether left on hotline, conveyed through email, or taken during business hours by staff will be handled as described above.

Fare and Service Change Comments, including those received during public comment period:

1. A public comment line will be enacted whenever NAIPTA is conducting a public comment period or has posted invitations for public comment regarding service changes. The public comment line will be provided 24 hours a day for citizens with questions, comments, or concerns.
2. Calls will be taken during regular business hours by Administrative Staff at the front desk.
3. An email address will be made available on posted signs at stops and on vehicles.
4. Any comments received via Public Comment cards available in the office and on the buses will be processed by Administrative Staff at the front desk.
5. All comments will be assigned to planning staff with contact made to caller within 2 business days as applicable.
6. All comments will be recorded in the Fare and Service Changes database. Detailed description of comment should be obtained with date, time, and route or stop information as well as caller's name and number if possible.
7. All investigation notes will be entered into the database, along with resolution of comment. Investigations and comments are to be marked closed at resolution.
8. The Transit Planner will report to the management team all open comments within the period at the close of the comment period. Management team may make recommendations or take additional action prior to information in summary form being reported to the Board as part of the comment period for fare and service changes.
9. All commenters will be offered an opportunity to participate in public meetings conducted by the Board of Directors.

** All comments whether left on hotline, conveyed through email, or taken during business hours by staff will be handled as described above.



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Section 3: Discrimination Complaint Form

In addition to developing complaint procedures, recipients must also develop a Title VI complaint form, and the form and procedure for filing a complaint shall be available on the recipient's website.

The Discrimination Complaint form is available on our website at <http://mountainline.az.gov/naipta-information/customer-rights/>

Discrimination Complaint Form
Northern Arizona Intergovernmental Public Transportation Authority (NAIPTA)
Civil Rights Division

NAIPTA 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 contact the Civil Rights Division by calling (928) 679-8908. The completed form must be returned to NAIPTA Civil Rights Division, Attn: Administrative Director, 3773 N Kaspar Dr, Flagstaff, AZ 86004 or via email: hdalmolin@naipta.az.gov.

Your Name:	Phone:
Street Address:	Alt Phone:
Person(s) discriminated against (if someone other than complainant):	
Name(s):	
Street Address, City, State & Zip Code:	

Date of Incident: _____

Which of the following best describes the reason for the alleged discrimination? (Circle All That Apply)

Title VI protections:

Race

Color

National Origin (LEP)

Other Civil Rights Statutes:

Age

Ability

Sex/Gender

Sexual Orientation

Gender Identity/Expression

Please describe the alleged discriminatory incident. Provide the names and titles of all NAIPTA employees involved, if available. Explained what happened and whom you believe was responsible. Please use the back of this form if additional space is required.

Discrimination Complaint Form

Northern Arizona Intergovernmental Public Transportation Authority (NAIPTA)
Civil Rights Division

Please describe the alleged discriminatory incident (continued) _____

Have you filed a complaint with any other federal, state or local agencies? (Circle one) Yes / No
If yes, list agency / agencies and contact information below:

Agency: _____ Contact Name: _____

Street Address, City, State & Zip Code: _____ Phone: _____

Agency: _____ Contact Name: _____

Street Address, City, State & Zip Code: _____ Phone: _____

I affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

Complainant's Signature: _____ Date: _____

Print or Type Name of Complainant

NAIPTA Office Use Only:

Date Received: _____

Received By: _____

Section 4: Discrimination Investigations, Complaints, and Lawsuits

In order 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.

The list of complaints and investigations since the submission of NAIPTA's Title VI Program in 2016 is shown on Table 1.

Table 1: Discrimination Complaints and Investigations

Discrimination Investigations, Complaints, and Lawsuits for 2011 thru 2016								
Date	Complaint	Summary of Allegation	Agency Handling	Investigator Assigned	Investigation Notes	Complaint (C) or Lawsuit (L)	Status	Action/Response Required

Section 5: 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.

NAIPTA Public Participation Plan (PPP) along with the Flagstaff Metropolitan Planning Organization (FMPO) for public planning of transit services are guides for NAIPTA's public participation activities. The purpose of the PPP is to promote the use of effective methods to inform and provide meaningful opportunities for input by all members of the public. In recognition of the importance of having an inclusive process, this plan has a special focus on reaching traditionally under-represented communities such as low-income, minority, and limited English proficient (LEP) populations. The FMPO PPP is attached as Exhibit 1.

Title VI Public Participation Plan



Invitation for Public Participation

Northern Arizona Intergovernmental Public Transportation Authority (NAIPTA) holds regular meetings of the Board of Directors and Transit Advisory Committee. These meetings are held at the NAIPTA Administrative Office in Flagstaff on the 3rd Wednesday and 1st Thursday, respectively. The public is invited to attend and participate in items on the agenda. A public comment period is available during every meeting and the public has 5 minutes to speak on any topic not on the agenda. The public comment period is at the beginning of every meeting.

Meetings are held in the VERA Conference Room at NAIPTA, 3773 N Kaspar Dr, Flagstaff, Arizona 86004.

Call our office @ (928) 679-8900 or TTY (800) 367-8939 for more information on meetings or to request meeting information in accessible formats.

Agendas are posted on our website at least 24 hours in advance of the meeting. Please visit our webpage <http://mountainline.az.gov/naipta-information/board-of-directors/> to view or print the

agenda.

Periodically, NAIPTA will hold public hearings related to service changes, fare changes, or implementation of transit facilities, including shelters and connection centers. Public hearings may also be conducted related to applications for federal funds.

The public is invited and encouraged to attend public hearings, whether to discuss concerns or speak in support of proposed services, improvements, or funding. During public hearings the Board, or NAIPTA staff, will accept comments and input of the public prior to taking action on related items.

Public hearings will also be held related to transit plans and public policies. Individuals interested in being notified about Public Hearing can contact our administrative offices at 928-679-8900 and ask to be placed on our mailing list. Notices about Public Hearing will be placed on our website at <http://mountainline.az.gov/news-events/> and will be advertised in the local newspaper.

If information is needed in another language, please contact NAIPTA's Customer Service Center at (928) 679-8900.

Si necesila informacion en Espanol, por favor comuniquese con el Departamento de Servicio al Clienle de NAIPTA al (928) 679-8900.





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Updated: July 21, 2017
Policy: Process for Public Participation
Goal: Establish a guideline for inviting public participation.
Contact: Rhonda Cashman, Clerk of the Board

Definitions:

- Fare is a one way single ride cash fare.
- Service area is the area within a ¼ mile of service, route, or stop.
- Public Meeting is a meeting conducted by Board of Directors or Transit Advisory Committee for purpose of providing direction to staff and hearing public input. All formal action will be taken at a public meeting.
- Open House is a meeting or event held by NAIPTA for purpose of sharing information and gathering input about proposed routes, services, etc.

Public Participation

1. Regular Public Meetings will be conducted by both the Board of Directors and Transit Advisory Committee at least once monthly, except for winter and summer breaks to be determined within annual calendar adopted by the Board.
2. Additional Public Meetings or Open Houses may be arranged by NAIPTA to provide additional opportunity for input.
3. Public Meetings and Open Houses will be held at NAIPTA offices or near areas most affected by service changes to provide easy access and encourage community participation.
4. Public meetings will be regularly announced and notices may be posted in the following media:
 - a. Newspaper
 - b. Radio or PSA
 - c. Notice of Meetings posted at the NAIPTA administrative offices
 - d. Notice of Meetings posted on NAIPTA website: <http://mountainline.az.gov/news-events/>
 - e. Notices placed inside transit vehicles
 - f. Direct mail flyers
 - g. Notices sent to community groups for posting and/or publication
5. A comment period of at least 30 days will be initiated by a Public Hearing or Public Meeting prior to any service changes as follows:
 - a. Increase service days or hours by 25% or more in a residential area (i.e. early or later service in residential neighborhood);
 - b. Reduce service days or hours by 25% or more to an area (e.g. eliminating Saturday service on only route that serves a neighborhood);



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- c. Increase service to frequency that is greater than 25% existing frequency (e.g. making 40-minute frequency a 20-minute frequency – doubling bus traffic in a corridor);
 - d. Reduce service to frequency less than 60 minutes to an area (e.g. frequency becomes 75 minutes);
 - e. Eliminates service to an area (e.g. removing service from a neighborhood so that no alternatives are available; 100% reduction of service);
 - f. Any fare increase.
6. Comment cards will be available at all Public Meetings and Open Houses.
 7. Final meetings will be held to review public comment, report on decisions and changes at least 30 days prior to effective date.



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Section 6: Limited English Proficiency Plan

Consistent with Title VI of the Civil Rights Act of 1964, DOT's implementing regulations, and Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency" (65 FR 50121, Aug. 11, 2000), recipients shall take reasonable steps to ensure meaningful access to benefits, services, information, and other important portions of their programs and activities for individuals who are limited English proficient (LEP). The recipient shall develop an assistance plan to address the identified needs of the LEP population(s) it services.

The four-factor analysis included in the LEP Plan identifies appropriate language assistance measures needed to improve access to Northern Arizona Intergovernmental Public Transportation Authority (NAIPTA) services and benefits by limited English proficient persons (LEP).

NAIPTA supports the goal of the DOT's LEP Guidance to provide meaningful access to its services by LEP persons. This Limited English Proficiency Plan reflects LEP compliance by NAIPTA and its continuous efforts to comply fully with the USDOT/FTA guidelines, ***"Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons; A Handbook for Public Transportation Providers" (April 13, 2007)***. The LEP Plan assesses language needs in the NAIPTA service area.

Limited English Proficiency Plan



NAIPTA LIMITED ENGLISH PROFICIENCY PLAN

Updated April 2015

I. PURPOSE:

The purpose of this policy is to establish effective guidelines, consistent with Title VI of the Civil Rights Act of 1964, for NAIPTA staff to follow when providing services to and interacting with, individuals who are limited English proficiency (LEP).

NAIPTA recognizes the importance of effective and accurate communication between personnel and the community that they serve as well as the importance of accessible information for our customers. Language barriers can impede effective and accurate communication in a variety of ways, including preventing individuals with limited English proficiency (LEP) from accessing and/or understanding information about programs, rights, and services, as well as preventing communication in difficult situations. Poor communication or lacking information with LEP community members can present NAIPTA with technical and ethical challenges. Ensuring maximum communication ability between staff and all segments of the service area serves the interests of both.

II. POLICY:

NAIPTA'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.

- ❖ All personnel shall 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 NAIPTA personnel will provide these services to them.
- ❖ Printed route guides and service information material will be printed in multiple formats as identified through meetings with community groups. At minimum, due to large Hispanic population, NAIPTA will provide Spanish versions of route guide and materials.

The steps taken are in consideration of Department of Transportation, Federal Transit Administrative guidance including:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the recipient or grantee. 'Excerpt of FMPO Title VI and Environmental Justice Plan' can be found on page 5.
2. The frequency with which LEP individuals come in contact with the program.
3. The nature and importance of the program, activity, or service provided by the recipient to people's lives.
4. The resources available to the recipient and costs.

III. DEFINITIONS:

- A. Primary Language: means an individual's native tongue or the language in which an individual most effectively communicates. Personnel should avoid assumptions about an individual's primary

language. For example, not all individuals from Central America speak Spanish fluently. Instead, some Central Americans may claim an indigenous language as their native tongue. Personnel should make every effort to ascertain an individual's primary language to ensure effective communication.

- B. Limited English Proficiency: designates individuals whose primary language is not English and who have a limited ability to read, write, speak, or understand English. LEP individuals may be competent in certain types of communication (*e.g.*, speaking or understanding), but still be LEP for other purposes (*e.g.*, reading or writing). Similarly, LEP designations are context-specific: an individual may possess sufficient English language skills to function in one setting, but these skills may be insufficient in other situations.
- C. Interpretation: is the act of listening to a communication in one language (source language) and orally converting it to another language (target language) while retaining the same meaning.
- D. Translation: is the replacement of written text from one language (source language) into an equivalent written text in another language (target language).
- E. Bilingual: refers to the ability to use two languages proficiently.
- F. NAIPTA Authorized Interpreter: (NAIPTA-AI) is a bilingual employee or contact who has been authorized to interpret for others in certain situations.
- G. NAIPTA-AI List: is an accounting of personnel or contacts who are bilingual and are authorized to act as volunteer interpreters. The Administrative Director will create and maintain the list.

IV. PROCEDURES FOR ACCESSING INTERPRETATION SERVICES:

A. NAIPTA Personnel requesting Interpretation Services:

1. Responding Personnel Responsibilities: Personnel in the field should anticipate the need of interpretation services (attempt to identify the potential for encountering LEP individual's and their primary language) and contact the Administrative Director for assistance in requesting training, assistance, or NAIPTA-AI.

Given an informal and non-controversial nature of need for interpretation services, personnel should first look to use of family, friends or bystanders for interpreting assistance. Personnel should use minor children to provide interpreter services only when no other non-minor is available.

Given a controversial or more personal matter, NAIPTA staff should be aware that using family, friends, or bystanders to interpret could result in a breach of Confidentiality, a conflict of interest, or an inadequate interpretation. In such cases, personnel are expected to follow the general procedures outlined in this plan; however exigent circumstances may require some deviations. In such situations, personnel are to use the most reliable, temporary interpreter available, such as bilingual personnel or citizens, including family, friends and bystanders. If no NAIPTA-AI is available, personnel should utilize such services available to obtain the LEP individual's contact information, general point of concern and follow up at such time as more appropriate services are available.

B. Contracted In-Person Interpretation Services:

Contracted in-person interpretation services shall be available to all personnel when interacting with LEP individuals. The Administrative Director will be the central conduit for connecting personnel in the field to an appropriate interpreter.

1. Accessing Contracted In-Person Interpreters: Personnel who believe they need this service will consult with the highest-ranking supervisor available. If the supervisor concurs, the personnel will contact the contracted in-person interpreter service, relay all information, and provide for appropriate scope of services and compensation.

NOTE: It is NAIPTA personnel's responsibility to develop and ask any questions. The interpreter's role is to serve as a neutral third party, taking care not to insert his or her perspective into the communication between the parties.

V. INTERVIEWS AND COMPLAINTS:

- A. Complaint Procedures for LEP Persons: Any LEP individual who wishes to file a complaint with NAIPTA regarding language access, or the discharge of NAIPTA's duties, shall be provided with complaint forms if possible. Complaints will be investigated by NAIPTA's Administrative Director with assistance from NAIPTA General Counsel.

VI. PROCEDURES FOR ACCESSING DOCUMENT TRANSLATION SERVICES:

- A. Translation services for documents such as key public involvement products and outreach materials for translation shall be coordinated through the Deputy General Manager or the Administrative Director.

VII. TRAINING: LANGUAGE ASSISTANCE POLICY AND INTERPRETER SKILLS:

- A. LEP Policies: NAIPTA will provide periodic training to personnel about NAIPTA's LEP policies, including how to access NAIPTA-authorized, telephonic and in-person interpreters. NAIPTA conducts such training for all new employees and provides ongoing employee training at least every two years.

VIII. MONITORING AND UPDATING LANGUAGE ASSISTANCE EFFORTS:

- A. Community Review: NAIPTA shall assess demographic data, review contracted language access services utilization data, and consult with community-based organizations during the tri-annual update of the Title VI report in order to determine if there are additional languages into which vital documents should be translated upon request.
- B. Tracking and Analysis of LEP Data: NAIPTA shall be responsible for assessing demographic data, reviewing contracted language access services utilization data, and consulting with community based organizations to ensure that NAIPTA is providing meaningful access to LEP persons to the services and benefits of the various transportation programs provided.

Excerpt of FMPO Title VI and Environmental Justice Plan:
LEP Population in and around Flagstaff

FMPO Limited English Proficiency				
	Households	Percent	Persons	Percent
Total	31228	100.00	86626	100.00
Spanish LEP	381	1.22	1057	1.22
Other Indo-European LEP	28	0.09	78	0.09
Asian-Pacific Islands LEP	120	0.38	333	0.38
Other languages LEP	95	0.30	264	0.30
Total LEP	624	2.00	1731	2.00

Source: 2010-2014 American Community Survey 5-Year Estimates

Population totals estimated using an average household size of 2.774 persons per household

A "limited English speaking household" is one in which no member 14 years old and over (1) speaks only English or (2) speaks a non-English language and speaks English "very well." In other words, all members 14 years old and over have at least some difficulty with English. By definition, English-only households cannot belong to this group.

Section 7: Minority Representation on Planning and Advisory Bodies

Title 49 CFR Section 21.5(b)(1)(vii) states that a recipient may not, on the grounds of race, color, or national origin, “deny a person the opportunity to participate as a member of a planning, advisory, or similar body which is an integral part of the program.” Recipients that have transit-related, non-elected planning boards, advisory councils or committees, or similar committees, the membership of which is selected by the recipient, must provide a table depicting the racial breakdown of the membership of those committees, and a description of efforts made to encourage the participation of minorities on such committees.

The Committee on Accessible Transit (CAT) is an advisory committee to NAIPTA staff that is comprised of non-elected members who are selected by NAIPTA. At this time, NAIPTA does not have any other committees where members are non-elected and selected by NAIPTA.

NAIPTA will, in future assignments to the CAT and other committees appointed by NAIPTA, utilize a short survey to query interested members about their racial identify and/or ethnicity to create a table depicting the racial breakdown of the committee(s), as well as document efforts to encourage participation of minorities on committee(s) as per the below.

Questionnaire

By self-identification, what is your ethnicity (cultural or national origin) and/or race? (You may choose to report more than one race to indicate racial mixture.)

- **Hispanic, Latino, or Spanish Origin**
A person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race.
- **White**
A person having origins in any of the original peoples of Europe, the Middle East or North Africa.
- **Black or African-American**
A person having origins in any of the black racial groups of Africa.
- **Native Hawaiian or other Pacific Islander**
A person having origins in any of the peoples of Hawaii, Guam, Samoa, or other Pacific Islands.
- **American Indian or Alaska Native**
A person having origins in any of the original people of the North and South American Continent (including Central America), and who maintain tribal affiliation or community attachment.
- **Asian**
A person having origins in any of the original people of the Far East, Southeast Asia, or the Indian Subcontinent, including for example, Cambodia, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand or Vietnam.

Table 2: Racial Breakdown of the Membership of Advisory Committees

	FMPO Region- Including City of Flagstaff and parts of Coconino County	Committee On Accessible Transit (CAT)
Approved Membership Positions		7
Filled Membership Positions		7
Members Completing Survey		0
Hispanic, Latino, or Spanish Origin		
White		
Black or African-American		
Native Hawaiian or other Pacific Islander		
American Indian or Alaska Native		
Asian		

Outreach Efforts to Encourage Participation

NAIPTA values the ethnic and cultural diversity of the public it serves within the NAIPTA region. Accordingly, NAIPTA actively seeks and encourages the participation of underrepresented groups on its non-elected committees when filling a vacancy.

NAIPTA makes concerted effort to provide the opportunity for qualified individuals from underrepresented ethnic groups to join its advisory committees I so that these bodies for accurately represent the ethnic, gender, and geographic diversity of the county.

NAIPTA utilizes a number of strategies to promote meaningful participation by underrepresented groups, including targeted outreach. Methods may include, but are not limited to, one or more of the following:

- Paid and free notices in the local media, especially those ethically/culturally-based for the targeted group we are trying to reach. This effort includes print, electronic and social media.
- Translating notices into the native language of any group underrepresented.
- Posting the vacancy on NAIPTA’s website and placing informational signs on NAIPTA buses and vans.
- Making presentations at existing meetings of civic, cultural or human service organizations frequented by the underrepresented group.
- Outreach to civic, cultural or human services organizations known to serve the underrepresented group informing them of the opportunity and need and enlisting their help.
- Notifying other public agencies of the vacancy and underrepresentation.
- Sending emails on the vacancy and underrepresentation to past attendees of NAIPTA public meetings and forums.

Section 8: Description of Sub-Recipient Monitoring

In accordance with 49 CFR 21.9(b), and to ensure that sub-recipients are complying with the DOT Title VI regulations, primary recipients must monitor their sub-recipients for compliance with the regulations. Importantly, if a sub-recipient is not in compliance with the Title VI requirements, then the primary recipient is not in compliance.

NAIPTA does not provide any federal funds to other recipients therefore has no sub recipients and no sub recipient monitoring policies

Section 9: Title VI Equity Analysis for the Construction of a Facility

The recipient shall complete a Title VI equity analysis during the planning stage with regard to where a project is located or sited to ensure the location is selected without regard to race, color, or national origin. Facilities include, but are not limited to, storage facilities, maintenance facilities, operations centers, etc. Facilities do not include bus shelters and transit stations, power substations, etc. are evaluated during project development of the NEPA process.

NAIPTA has no current or anticipated plans to develop new transit facilities covered by these requirements. No facilities covered by these requirements have been developed since 2012.

Section 10: Title VI Training

NAIPTA provides various levels of internal training and requires additional external training for the Title VI coordinator.

Operators: Operators in the field are trained annually by the Title VI coordinator on requirements of Title VI and other civil rights statutes. Operators receive guidance on expectation that all customers are to be treated fairly and respectfully. Operators are also trained on reasons for refusal of service if necessary due to violation of riders' rules of conduct.

Managers and Supervisors: Managers and Supervisors of field operators receive same training as operators plus training on taking complaints and routing Title VI Coordinator if required. Managers and Supervisors are trained to investigation all service refusals to ensure no customer is refused service other than for violation of riders' rules of conduct.

Fleet: Our fleet department receives same training as operators plus training regarding vehicle assignments to ensure that all neighborhoods or routes have equal opportunity to be served by varying fleet of hybrid-electric and diesel fleet.

Facilities: Our facilities department receives same training as operators plus training regarding stop amenities and stop maintenance to ensure that all neighborhoods or routes receive same quality of stops and maintenance.

Planning: Our planning department receives same training as operators plus training on public participation process and need for analysis for recommending routes changes, stop additions or removal, connection center locations, and facilities planning.

Administration: Our administrative department receives same training as operators plus training on receiving and responding to complaints to ensure the public is aware of policies and procedures and to ensure complaints are routed to the Title VI Coordinator.

External training, to include Title VI training provided by ADOT and FTA , is required by NAIPTA at least every three years for one or more of the following positions: CEO-General Manager, Administrative Director/Title VI Coordinator, Deputy General Manager, Operations Director, Facilities Manager, Transit Planner, and Mobility Planner.

Section 11: Approval of Title VI Program by Governing Entity

The recipient must provide a copy of board meeting minutes, resolutions, or other appropriate documentation showing the board of directors or appropriate governing entity or official(s) responsible for policy decisions reviewed and approved by the Title VI Program. The approval must occur prior to submission to the FTA.



Northern Arizona Intergovernmental Public Transportation Authority

3773 N. Kaspar Drive • Flagstaff, AZ 86004 • 928-679-8900 • FAX 928-779-6868 • www.naipta.az.gov

Title VI Program

Contact: Heather Dalmolin
Administrative Director
928.679.8908

Date effective: April 1, 2015

Policy Statement:

In accordance with NAIPTA Policies and Procedures, as approved by the Board of Directors, NAIPTA operates services without regard to age, sex/gender, ability, race, color, national origin, gender identify or expression, and sexual orientation. NAIPTA is committed to applying the principles of local regulations as well as state and federal anti-discrimination laws to give customers using public transit equal access, seating and treatment without regard to age, sex/gender, ability, race, color, national origin, gender identify or expression, and sexual orientation. These rights also apply to service frequency, vehicle age and quality, and bus stop quality (FTA Circular 4702.1).

NAIPTA provides a process for customer complaints, including assignment to investigator and steps for follow up. Customers are able to use comment cards on the vehicles, a 24-hour hotline, or contact us via email. Our statement of customer rights and contact information are provided in every vehicle as well as within our schedule and on our websites. Complaints of discrimination are immediately directed to the Administrative Director for prompt attention. Customers are availed of how to file complaints, up to and including filing complaints against NAIPTA with FTA.

NAIPTA recognizes the diversity of the communities served and serves individuals who are Limited English Proficient (LEP) with schedules and route information supplied in Spanish as well as English. NAIPTA has developed a Limited English Proficiency (LEP) Plan address needs for addressing these limitation of non-English speaking riders.

As Governing Body of NAIPTA, we hereby confirm that such policy exists and that the statements made above are part of that policy.

Richard Payne, Chair of NAIPTA Board of Directors
Updated: July 1, 2015



Getting you where you want to go

II. Requirements of Transit Providers

Section 12: System-wide Service Standards

This requirement applies to all fixed route providers of public transportation service. Appendix C to 49 CFR part 21 provides in Section (3)(iii) that “no person or group of persons shall be discriminated against with regard to the routing, scheduling, or quality of service of transportation service furnished as a part of the project on the basis of race, color, or national origin. Frequency of service, age, and quality of vehicles assigned to routes, quality of stations serving different routes, and location of routes may not be determined on the basis of race, color, or national origin.”

Service standards must include:


- *Vehicle load for each mode*
- *Vehicle headway for each mode*
- *On-time performance for each mode*
- *Service availability for each mode*

Section 13: System-wide Service Policies

FTA requires fixed route transit providers to develop a policy for each of the following service indicators. Transit providers may set policies for additional indicators as appropriate.

Policies must include:

- *Distribution of transit amenities for each mode*
- *Vehicle assignment for each mode*

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System-Wide Service Standards and Policies



NAIPTA System-Wide Service Standards and Policies

1.0 Purpose:

As outlined in Title VI Circular 4702.1B and Environmental Justice Circular 4703.1, the Federal Transit Administration (FTA) requires that all fixed route transit providers establish and monitor a set of service standards and policies that can be used to measure system performance and ensure that transit services are being provided in a fair and equitable manner. The purpose of this document is to establish the new Title VI standards and policies that will be used by Northern Arizona Intergovernmental Public Transportation Authority (NAIPTA) and submitted to the FTA as part of the triennial Title VI Program.

2.0 Scope:

These standards and policies apply to all NAIPTA transit service and passenger facilities.

3.0 Responsibilities:

General oversight for the following Title VI policies is performed by NAIPTA's Civil Rights Division in conjunction with the Deputy General Manager, the Operations Director, and the Facilities Manager. These divisions are responsible for the ongoing implementation and execution of these policies.

4.0 Policy:

In accordance with FTA Title VI requirements, NAIPTA will regularly monitor the performance of the fixed route bus as related to the system-wide service standards for the following indicators. Monitoring is designed to ensure that minority and non-minority routes are being operated in a fair and equitable manner.

- Vehicle Load;
- Vehicle Headways;
- On-Time Performance;
- Service Availability; and
- Ridership Productivity

Any significant service deficiencies identified through this process will be evaluated further to determine the extent to which minorities are affected. If the negative effect on minority persons is proportionally higher than the effect on non-minority persons, additional steps may be necessary to address the discrepancy.

NAIPTA shall also monitor its vehicle assignments and the distribution of transit amenities based on the policies outlined in this document to prevent discriminatory practices.

A. Route Categories

In order to develop appropriate standards for the different types of NAIPTA transit service, each route is classified as belonging to one of the two categories listed below. These classifications are used to identify service standards which are specific to each route category.

1. Core. Core bus routes provide high-frequency service with extended service spans to some of the busiest corridors in the community. The routes are generally longer and serve major trip generators such as

universities, regional shopping malls, and high-density housing and employment areas.

2. Local. Local bus service usually operates on medium-length corridors and offers slightly lower levels of service. These routes will often serve smaller trip generators such as schools, hospitals, small shopping centers, and medium-density housing and employment sites.

B. System-wide Service Standards

The following sections outline the five primary service indicators that will be used to monitor NAIPTA bus lines and draw comparisons between minority and non-minority routes. Each standard is set based on the two service categories listed above and the specified time periods. NAIPTA defines weekday peak periods as 6:00 to 9:00AM and 3:00 to 6:00PM.

The data used to compare route performance to these standards will be collected over a representative time period to ensure that they provide an accurate snapshot of each route. To ensure consistency, NAIPTA will use data from March, April, September or October, which represent the busiest months of the year in terms of ridership. These months also serve as good comparison points because schools are in session and few major holidays are observed. Data collection time periods may also fluctuate based on data availability.

Vehicle Loads

The FTA Title VI Circular describes vehicle loads as follows:

Vehicle load can be expressed as the ratio of passengers to the total number of seats on a vehicle. For example, on a 40-seat bus, a vehicle load of 1.3 means all seats are filled and there are approximately 12 standees. A vehicle load standard is generally expressed in terms of peak and off-peak times. Transit providers that operate multiple modes of transit must describe the specific vehicle load standards for peak and off-peak times for each mode of fixed route transit service (i.e., bus, express bus, bus rapid transit, light rail, heavy rail, commuter rail, passenger ferry, etc., as applicable), as the standard may differ by mode.

NAIPTA monitors load factor and capacity on all routes to ascertain overcrowding and to determine when additional service is necessary. The load factor for each route is calculated based on the average maximum load of each trip on a route during the peak and midday weekday periods. As load factors are not typically a major influence on weekend service, no weekend load data is included.

The following table outlines the vehicle load factor standards, which are based upon historical data, industry practices, and staff analyses. If a route exceeds its respective load factor standard, NAIPTA staff will review the service to determine if additional capacity should be provided.

Table 1 -Vehicle Load Factor Standards

	Seated	Peak		Midday	
		Load	Passengers	Load	Passengers
Core	37	1.2	44.4	1.0	37.0
Local	37	1.2	44.4	1.0	37.0

Vehicle Headways

The FTA Title VI Circular describes vehicle headways as follows:

Vehicle headway is the amount of time between two vehicles traveling in the same direction on a given line or combination of lines. A shorter headway corresponds to more frequent service. Vehicle headways are measured in minutes (e.g., every 15 minutes); service frequency is measured in vehicles per hour (e.g., 4 buses per hour). Headways and frequency of service are general indications of the level of service provided along a route. Vehicle headway is one component of the amount of travel time expended by a passenger to reach his/her destination. A vehicle headway standard is generally expressed for peak and off-peak service as an increment of time (e.g., peak: every 15 minutes; and off peak: every 30 minutes). Transit providers may set different vehicle headway standards for different modes of transit service. A vehicle headway standard might establish a minimum frequency of service by area based on population density. For example, service at 15- minute peak headways and 30-minute off-peak headways might be the standard for routes serving the most densely populated portions of the service area, whereas 30-minute peak headways and 45-minute off-peak headways might be the standard in less densely populated areas. Headway standards are also typically related to vehicle load. For example, a service standard might state that vehicle headways will be improved first on routes that exceed the load factor standard or on routes with the highest load factors.

Vehicle headways are largely determined by ridership demand and vary widely by route, time and day. Based on changes in ridership levels, headways may be adjusted during the quarterly schedule change process by agency staff.

Table 2 -Vehicle Headway Standards

Category	Peak	Off-Peak
Core	30	60
Local	60	60

NAIPTA calculates headways as the average length of time between the scheduled arrival times of subsequent vehicles on a specific route. The preceding table outlines the vehicle headway standards by route category and time of day. These standards represent typical headways for each route category; however, many routes operate with more frequent service based on ridership demand.

On-Time Performance

The FTA Title VI Circular describes on-time performance as follows:

On-time performance is a measure of runs completed as scheduled. This criterion first must define what is considered to be "on time." For example, a transit provider may consider it acceptable if a vehicle completes a scheduled run between zero and five minutes late in comparison to the established schedule. On-time performance can be measured against route origins and destinations only, or against origins and destinations as well as specified time points along the route. Some transit providers set an on-time performance standard that prohibits vehicles from running early (i.e., ahead of schedule) while others allow vehicles to run early within a specified window of time (e.g., up to five minutes ahead of schedule). An acceptable level of performance must be defined (expressed as a percentage). The percentage of runs completed system-wide or on a particular route or line within the standard must be calculated and measured against the level of performance for the system. For example, a transit provider might define on-time performance as 95 percent of all runs system-wide or on a particular route or line completed within the allowed "on-time" window.

NAIPTA regularly monitors on-time performance to increase service reliability and determine if running time changes are needed. As part of the quarterly schedule update process, running times on each route are reviewed and adjusted as warranted by changing traffic conditions.

NAIPTA has previously established an on-time performance goal of 95 percent for all modes. For bus routes, "on time" is defined as arriving no more than one minute before or three minutes after the scheduled arrival time. This 95 percent goal continues to apply as the weekday on-time performance standard for both route categories.

Table 3 -On-Time Performance Standards

Category	On-Time Perf
Core	95.0%
Local	95.0%

Service Availability

The FTA Title VI Circular describes service availability as follows:

Service availability is a general measure of the distribution of routes within a transit provider's service area. For example, a transit provider might set a service standard to distribute routes such that a specified percentage of all residents in the service area are within a one-quarter mile walk of bus service or a one-half mile walk of rail service. A standard might also indicate the maximum distance between stops or stations. These measures related to coverage and stop/station distances might also vary by population density. For example, in more densely populated areas, the standard for bus stop distance might be a shorter distance than it would be in less densely populated areas, and the percentage of the total population within a one-quarter mile walk of routes or lines might be higher in more densely populated areas than it would be in less densely populated areas. Commuter rail service or passenger ferry service availability standards might include a threshold of residents within a certain driving distance as well as within walking distance of the stations or access to the terminal.

The NAIPTA approach to service availability is shaped largely by the NAIPTA 5 and 10 Year Long Range Plan. This plan uses market-based approach in determining when and where transit service will be operated. More specifically, it provides a framework for the efficient and effective expenditure of transit funds, and for realizing the highest return on investment in terms of public good and ridership productivity. Therefore, instead of requiring NAIPTA to make service available to a larger geographic region, these guidelines enable NAIPTA to provide frequent, high-quality service to the areas with the highest ridership demand. This approach has proven to be particularly effective at fulfilling the transit needs of Flagstaff's minority and low income populations.

Table 4- Service Availability Standards

Category	Stop Spacing (mi)
Core	0.25
Local	0.25

Although NAIPTA utilizes this ridership-based approach to service availability, the agency has developed stop-spacing standards for each of the route categories. These standards are based on the current average distance between stops for all of the routes for each category. Distances between individual stops vary significantly based on nearby land uses, development densities, geographic characteristics, ridership demand and other local conditions.

Ridership Productivity

The NAIPTA 5 and Long Range Plan identifies a series of ridership-based standards that are used to monitor and evaluate route performance. Based on historical ridership and staff analyses, the primary standard for measuring service performance is boardings per revenue hour. For evaluation purposes, a specific standard is applied to each route category and day. This standard is recalibrated each quarter based on the average boardings per revenue hour for each route category with a minimum standard of 5 boardings per revenue hour. Bus routes that consistently operate below their respective thresholds and are unresponsive to marketing, restructuring, and operational refinements are subject to discontinuation.

A complete summary of the minimum ridership productivity standards by service category is shown below.

Table 5- Ridership Productivity Standards

Category	Weekday	Saturday	Sunday
Core	10	7	5
Local	7	5	5

C. System-wide Service Policies

These policies are intended to provide guidance and instruction to ensure that vehicle assignment and passenger amenity distribution practices do not result in discrimination on the basis of race, color or national origin.

Vehicle Assignment

The FTA Title VI Circular describes vehicle assignment as follows:

Vehicle assignment refers to the process by which transit vehicles are placed into service in depots and on routes throughout the transit provider's system. Policies for vehicle assignment may be based on the age of the vehicle, where age would be a proxy for condition. For example, a transit provider could set a policy to assign vehicles to depots so that the age of the vehicles at each depot does not exceed the system-wide average. The policy could also be based on the type of vehicle. For example, a transit provider may set a policy to assign vehicles with more capacity to routes with higher ridership and/or during peak periods. The policy could also be based on the type of service offered. For example, a transit provider may set a policy to assign specific types of vehicles to express or commuter service. Transit providers deploying vehicles equipped with technology designed to reduce emissions could choose to set a policy for how these vehicles will be deployed throughout the service area.

The NAIPTA bus fleet includes over 20 active vehicles and is made up of 3 vehicle types: 35-foot diesel buses, 35-foot electric-diesel hybrid buses, and one 60-foot articulated electric-diesel hybrid bus. As all buses are generally of the same size and capacity, the use of buses on routes is rotational with the exception of the articulated bus. The articulated bus is assigned to our highest demand route.

NAIPTA maintains extremely high safety standards and closely monitors the age and condition of its vehicles to determine when new buses are needed and to guarantee that buses are equitably distributed and used on routes.

Transit Amenities

The FTA Title VI Circular describes transit amenities as follows:

Transit amenities refer to items of comfort, convenience, and safety that are available to the general riding public. Fixed route transit providers must set a policy to ensure equitable distribution of transit amenities across the system. Transit providers may have different policies for the different modes of service that they provide. Policies in this area address how these amenities are distributed within a transit system, and the manner of their distribution determines whether transit users have equal access to these amenities. This... is not intended to impact funding decisions for transit amenities. Rather, this ... applies after a transit provider has decided to fund an amenity.

NAIPTA provides a wide array of transit amenities which include bus shelters, benches, trash cans, lighting, and posted stop-specific schedule information. These amenities are distributed throughout the service area based on ridership, staff analyses and customer requests.

General policies for the distribution of bus shelters, benches, trash cans, lighting fixtures and posted schedule information are outlined below. NAIPTA staff monitors the locations of all transit amenities to ensure that they are equitably distributed to minority and low income areas.

Bus Shelters and Benches

The installation of bus shelters is generally based upon ridership and staff input. Spatial constraints may also limit where bus shelters can and cannot be installed.

Stops located near medical and senior facilities are also furnished with benches as much as possible.

Trash Cans

The trash cans are distributed based on ridership, customer requests, maintenance considerations and staff input.

Lighting

As part of its focus on passenger safety, NAIPTA installs lighting at many of its bus stop locations. Additional solar-powered lights have been added to stops throughout the service area to promote safety and energy-efficiency. The distribution of lighting fixtures is primarily based upon ridership, customer requests, safety considerations, and staff recommendations.

Posted Schedule Information

NAIPTA currently features stop-specific "information signs" at majority of bus stops. These information signs provide scheduled departure times for all trips departing from the stop. The installation of information signs is generally based upon ridership, transfer activity, and staff input. Signs are typically also provided for stops with common interagency transfers.

5.0 Definitions:

Environmental Justice: The overarching objective of environmental justice is a fair distribution of the benefits or burdens associated with Federal programs, policies, and activities.

Low-income Population: Refers to any readily identifiable group of low-income persons who live in geographic proximity, and, if circumstances warrant, geographically dispersed/transient persons (such as migrant workers or Native Americans) who will be similarly affected by a proposed FTA program, policy, or activity.

Minority Population: Means a readily identifiable group of minority persons who live in geographic proximity and, if circumstances warrant, geographically dispersed/transient populations (such as migrant workers or Native Americans) who will be similarly affected by a proposed DOT program, policy, or activity.

Title VI: Title VI of the Civil Rights Act of 1964 provides that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participated in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

6.0 Summary of Changes:

Initial release of this policy was approved by the Board of Directors on March 19, 2015.

Exhibits



**FLAGSTAFF METROPOLITAN
PLANNING ORGANIZATION**
CITY OF FLAGSTAFF ♦ COCONINO COUNTY ♦ ARIZONA DOT
Office: 100 West Birch Avenue ♦ Flagstaff, Arizona 86001
Mail: 211 West Aspen Avenue ♦ Flagstaff, Arizona 86001
Phone: (928) 226-4849 ♦ Fax: (928) 213-4825
www.flagstaffmpo.org

Public Participation Plan

Flagstaff Metropolitan Planning Organization

Members

City of Flagstaff
Coconino County
Arizona Department of Transportation

Contact:

David Wessel, FMPO Manager
211 W. Aspen Avenue
Flagstaff, AZ 86001
Phone: 928/213-2650
Fax: 928/213-4825
Email: dwessel@flagstaffaz.gov
www.Flagstaffmpo.org

En español:

Para mas informacion, a esta interesado en partcipar en el planeamiento del proceso de transporte en su comunidad y necesita asisencia con idioma, por favor comuniquese:

Señor David Wessel
Teléfono: 928/213-2650
dwessel@flagstaffaz.gov

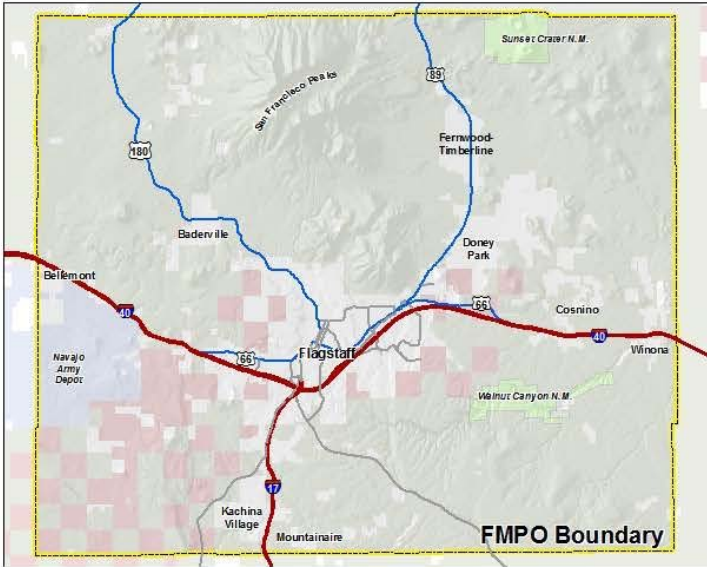
For Navajo: pending proper translation

Flagstaff Metropolitan Planning Organization (FMPO) Public Participation Plan

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FMPO Planning Boundary



Flagstaff Metropolitan Planning Organization Public Participation Plan
Amended September 24, 2014

Flagstaff Metropolitan Planning Organization Public Participation

Introduction

This document guides the public involvement activities conducted by the Flagstaff Metropolitan Planning Organization (FMPO). The purpose of public participation is to insure a proactive process affording the opportunity for the public to be involved in all phases of the multi-modal transportation planning process by providing complete information, timely public notice, sufficient periods for comment, full access to key decision points, and early and continuing engagement in developing transportation plans and programs. FMPO encourages active public participation in identifying and commenting on transportation issues, programs, and projects at every stage of the planning process.

Commencing with the Transportation Equity Act of the 21st Century (TEA-21), the need for public participation in all stages of the transportation planning process was emphasized by requiring metropolitan planning organizations (MPOs) to “include provisions to ensure early and continuing involvement of the public in the development of plans and Transportation Improvement Programs (TIPs)”. The successor, Safe Accountable Flexible Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU), continues the tradition of public participation. Interested parties might include, but not be limited to: *citizens, affected public agencies, representatives of public transportation employees, freight shippers, providers of freight transportation services, private providers of transportation, representatives of users of public transportation, representatives of users of pedestrian walkways and bicycle transportation facilities, and representatives of the disabled*, as noted in Title 23 United States Code (USC), Section 134 I (5).

Background

The United States Congress created the requirement for establishing Metropolitan Planning Organizations. FMPO was established in 1996 with responsibility for transportation planning within the regional area generally surrounding Flagstaff, Arizona and the state highway system within its boundaries. Federal regulations require that an MPO be designated to carry out a comprehensive, continuing, and coordinated transportation planning process for urbanized areas with a population of 50,000 or more. The City of Flagstaff is

the fiscal agent for FMPO. The region covered by FMPO is nearly 525 square miles and is shown on the preceding map.

Governance Structure

The FMPO Executive Board is the forum for cooperative decision-making on transportation related matters. This six-member board is comprised of principal elected officials from local government and a representative from the Arizona State Transportation Board.

FMPO Executive Board Representation

City of Flagstaff	3 votes
Coconino County	2 votes
Az State Transportation Board	1 vote

The Executive Board provides policy guidance and direction for the metropolitan transportation planning process.

The Technical Advisory Committee (TAC) is an advisory committee to the Executive Board. The eight-member committee is comprised of technical staff from the member agencies, as well as representatives from the Arizona Department of Transportation's Flagstaff District Engineering Office and Transportation Planning Division, and the Northern Arizona Intergovernmental Public Transportation Authority. In addition, there is an ex-officio non-voting member from Northern Arizona University.

FMPO Technical Advisory Committee Representation

1. Flagstaff Development Services Director
 2. Flagstaff Engineering Director
 3. Flagstaff Traffic Engineering Manager
 4. Coconino County Community Development Director
 5. Coconino County Public Works Director
 6. ADOT District Development Engineer
 7. NAIPTA Planning Manager
 8. ADOT Transportation Planning Division Reg. Planner
 9. (ex-officio) NAU V.P. of Facilities and Finance
-

Executive Board and Technical Advisory Committee

The Executive Board and TAC meetings shall be held in conformance with the Arizona Open Meetings Law (A.R.S. Sec. 38-431, et seq.). The meeting agenda will be prepared and then posted at the following locations:

A further 1994 Presidential directive dictates, "Each Federal agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations." Executive Order 12898

Groups impacted: low-income and minority populations, which may include sub-groups of elderly and disabled.

FMPO will make every effort to hold public meetings in facilities that are compliant with the Americans with Disabilities Act (ADA); and, arrange for reasonable accessibility and accommodation to persons with disabilities. Further, to provide equally effective communication, FMPO will make due preparation, when appropriate, for persons requiring assistance, such as the hearing or visually impaired, upon request.

FMPO will assist persons with limited English proficiency to participate in the transportation planning process. Staff will make every effort to provide Spanish translators and document translation, where feasible, upon request. Elderly persons or zero vehicle households who are not able to attend meetings may make a request for the information at FMPO offices for delivery of materials to their homes. FMPO staff, coordinating availability, is willing to go speak to groups in an effort to eliminate participation barriers and involve citizens in the transportation process.

Current federal financial assistance for FMPO is provided by the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) via an annual transportation planning allocation. No lawsuits or complaints alleging discrimination on the basis of race, color, or national origin have been filed regarding FMPO.

Master Distribution List

A master e-mail distribution list will be developed and maintained; interested persons may ask to be placed on or removed from the list by contacting FMPO offices. This continuously updated list will be used to notify interested parties of upcoming meetings and other opportunities for public involvement. Furthermore, this list will include news media, community groups, business and professional groups, special interest groups, elected and appointed officials, affected agencies and interested citizens.

Newsletter

A newsletter will be produced at least semi-annually, distributed to all parties on the master distribution list and included on the FMPO website. Each issue will contain staff contact information, meeting schedules, and information on current planning projects.

FMPO Website (www.Flagstaffmpo.org)

FMPO will develop and maintain an Internet website to provide the most current information available on various topics. The website contents are expected to include:

- Contact information
- Current Executive Board and Technical Advisory Committee information
- Meeting calendars and agendas
- Press releases
- Work products and publications
- Links to related agencies

Media Contact and Advertising

The media play a crucial role in getting information regarding significant transportation activities and issue to the public. FMPO will maintain ongoing communication with the media through various means, including press releases and interviews.

The Arizona Daily Sun will be utilized as the primary print medium for advertising transportation issues of interest to the general population. Public service announcement and interviews may be broadcast on local radio stations.

Meetings

Meetings are used to both inform the public of the planning process and solicit input, ideas, and feedback. The FMPO Executive Board and Technical Advisory Committee meetings each include time on the agenda for general public comment on transportation related items.

Meetings may include informal presentation at regional sites, open house, round tables, or other community forums, and formal presentations to various service clubs, civic, and professional groups.

Public Comment and Response to Comments

Written comments received through the public involvement process will be included along with responses as an appendix to the document under review, as appropriate, or will otherwise be summarized and presented to the board or other body for awareness purposes.

FMPO Work Products

The scope, depth, and duration of public involvement will vary depending on the FMPO work product (document). The following section identifies the MPO's minimum input, review, and comment opportunities that will be offered before adoption.

Regional Transportation Plan (RTP)

The Regional Transportation Plan, also known as the RTP, is a comprehensive plan of the transportation system that covers, at the minimum, a 20-year planning horizon. Federal law requires that major updates occur at least every five years after it is adopted. A specific RTP process will be developed for each major update, all major updates to the RTP would follow the same basic process, as follows:

- During the early stages of plan development, at least two formal public meeting (a.k.a. workshops) will be hosted to involve interested parties.
- Stakeholders will be identified and engaged early in the process.
- Efforts to engage and inform the general public of the process and process results will include media outreach, website information, and potential other methods.
- Continuing engagement during development of the plan will occur in stages for the public and elected/appointed officials.
- The Draft RTP will be presented to the FMPO Technical Advisory Committee and Executive Board for review and comment prior to the public comment period
- The comment period on the draft RTP will last for 30 days; copies of the plan will be placed in accessible facilities and locations will be published in the primary newspaper
- Comment will be collected and response provided, as appropriate.
- The Final Draft RTP, comment, and response will be presented to the FMPO Technical Advisory Committee for review prior to Executive Board recommendation.
- All written and appropriate public comments received will be made part of the final document
- The Final RTP will be presented to the FMPO Executive Board for adoption.

Metropolitan Transportation Improvement Program (MTIP)

The Metropolitan Transportation Improvement Program is a short-term listing of projects expected to be in the immediate future. The Transportation Improvement Program (TIP) includes Northern Arizona Intergovernmental Public

Transportation Authority final program of projects for section 5307 funding under the Federal Transit Administration, unless amended. Public notice procedures for the TIP also satisfy FTA public notice requirements for the final program of projects (POP). The MTIP is updated at least every two years, based on the following process:

- FMPO will announce a call for projects 30 days before Technical Advisory Committee review
- FMPO staff, in conjunction with the Technical Advisory Committee, will prepare a Draft MTIP, which will be recommended to the Executive Board for public review
- The public review period on the MTIP will last 30 days
- Comment will be collected and response provided, as appropriate
- The Final Draft MTIP, comment, and response will be presented to the FMPO Technical Advisory Committee prior to Executive Board recommendation
 - An ad giving notice will be placed in the local paper of record and state that the FMPO TIP process satisfies the NAIPTA program of projects notice process
- The Final MTIP will be presented to the FMPO Executive Board for adoption
 - An ad giving notice will be placed in the local paper of record and state that the FMPO TIP process satisfies the NAIPTA program of projects (POP) notice process

Public Participation Plan (PPP)

The Public Participation document will be updated as required, based on the following process:

- FMPO staff, in conjunction with the Technical Advisory Committee, will prepare a draft PPP and/or related amendments.
- Draft PPP will be presented to Executive Board prior to public review
- The comment period on the updated PPP will last 45 days
- The FMPO Technical Advisory Committee shall review all written public comments and prepare responses prior to recommendation to the Executive Board for adoption

Work Program Tasks

An explicitly public involvement plan (PIP) will be developed for each task in the annual Unified Planning Work Program and budget. Each PIP will be tailored to the complexity and impact of the task on the public.

Amendments to Adopted Documents

Amendments to the RTP and the MTIP are occasionally necessary after they have been adopted. With the exception of emergency or exempt projects, amendments will utilize the following process:

- FMPO will announce the proposed amendment via agenda posting
- Amendments will be reviewed by the TAC with a recommendation to the Executive Board for adoption
- Upon review by Executive Board, the amendment will either be approved or denied

Appendix A: Summary Table of FMPO Public Participation Procedures and Tools

Summary of FMPO Public Participation Procedures and Tools

Public Participation Component	Meetings	Public Comment Period	Typical Public Participation Techniques	Additional Comment
Adopted Documents, Plans, and Programs				
Regional Transportation Plan (RTP)	Initial and subsequent public meetings TAC Executive Board	30 days	Posted AZ Revised Statute Legal Notice News Release Website Comment Forms	Update every 4 years Comments received to be included in RTP
Metropolitan Transportation Improvement Program (MTIP)	TAC Executive Board	30 days	Posted AZ Revised Statute Legal Notice News Release Website Comment Forms	Update every 1-2 years Public comments provided to Executive Board
Public Participation Plan (PPP)	TAC Executive Board	45 days	Posted AZ Revised Statute Legal Notice News Release Website Comment Forms	Updated as required Public comments provided to Executive Board
Amendments to adopted documents	TAC Executive Board	N/A	Posted AZ Revised Statute Legal Notice News Release Website	Non-exempt amendments
Amendments Exempt from public participation	N/A	N/A	N/A	Emergency projects and minor revisions
Open Public Meetings				
Executive Board Meetings	Regularly scheduled meetings	N/A	Posted AZ Revised Statute Legal Notice Master distribution list Newsletter Website	Public comment accepted at meeting
TAC	Regularly scheduled meetings	N/A	Posted AZ Revised Statute Legal Notice Master distribution list Newsletter Website	Public comment accepted at meeting

Public Participation Component	Meetings	Public Comment Period	Typical Public Participation Techniques	Additional Comment
Outreach Components				
Title VI Environmental Justice	TAC Executive Board Public open houses	N/A	Mailings upon request News release Website Coordinate with school staff for information delivery as appropriate	Assist persons with limited English proficiency Speaking engagements coordinated at community, neighborhood, & faith based groups
Master Distribution List	N/A	N/A	Upon request and through comment forms, website, public meetings	Maintained and updated regularly
Newsletter	N/A	N/A	Sent to those on master distribution list and by request Website	Produced twice per year
FMPO Website	N/A	N/A	Web address supplied with news releases, on business cards and on other web links	Maintained and updated regularly
Staff Presentations	Government, community groups, business and professional groups	N/A	N/A	Upon request; subject to staff availability
News Release	N/A	N/A	Sent to news media	N/A

PASSED AND ADOPTED by the Executive Board of the Flagstaff Metropolitan Planning Organization.

Audra Merrick, Chairperson
Flagstaff Metropolitan Planning Organization

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