



**The City of Pocatello
Public Transit Department
Title VI**

Updated November 17, 2020
Pocatello City Council approved November 20, 2014
FTA reviewed

RECIPIENT INFORMATION

RECIPIENT: City of Pocatello, Public Transit Department
[\dba](#) **Pocatello Regional Transit**
Urban Transit Agency (population under 200,000)

SUBMITTAL DATE: **November 17, 2020**

EXPIRATION YEAR: 2024

CONTACT INFORMATION:

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Pocatello Regional Transit
PO Box 4169
911 North 7th
Pocatello, Idaho 83205
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Fax: 208-233-5149

Mayor: Mayor
City of Pocatello
PO Box 4169
911 North 7th
Pocatello, Idaho 83205
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I. PROVISION OF TITLE VI ASSURANCES

The City of Pocatello, hereinafter sometimes referred to as Pocatello Regional Transit (PRT) (a Department of the City of Pocatello), certifies that, as a condition of receiving Federal financial assistance under authorizing legislation under the Moving Ahead for Progress in the 21st Century (MAP-21), Public Law 112-141, signed into law on July 6, 2012, and effective October 1, 2012, will ensure that:

- a. Pocatello Regional Transit shall submit, on an annual basis, its Title VI Assurance, as part of the annual Certification and Assurance submission to the FTA.
- b. No person, on the basis of race, color, or national origin, will be subjected to discrimination in the level and quality of transportation services and transit-related benefits.
- c. Pocatello Regional Transit will compile, maintain, and submit in a timely manner, Title VI information required by FTA Circular 4702.1B and in compliance with the Department of Transportation's Title VI Regulation, 49 CFR, Part 21.7.
- d. Pocatello Regional Transit will make it known to the public that any person or persons alleging discrimination on the basis of race, color, or national origin as it relates to the provision of transportation services and transit-related benefits may file a complaint with the Federal Transit Administration and/or the U.S. Department of Transportation.
- e. Pocatello Regional Transit does not pass FTA funds through to a subrecipient, however, if PRT would pass through we would request a Title VI Plan from that recipient and monitor compliance of their plan.

II. TITLE VI COMPLIANCE HISTORY

- a. There are no outstanding lawsuits or complaints naming the City of Pocatello or Pocatello Regional Transit which allege discrimination on the basis of race, color or national origin with respect to service or other transit benefits.
- b. There are no pending applications for Federal financial assistance, and there is no Federal financial assistance currently being provided to Pocatello Regional Transit other than that being supplied by the Federal Transit Administration (FTA). Currently Pocatello Regional Transit is applying for Section 5307, 5311& 5339 funding through the FTA.
- c. During the course of the last three (3) years, there have not been any civil rights compliance review activities conducted with respect to Pocatello Regional Transit and, to the best of our knowledge, there are not presently any ongoing civil rights compliance review activities being conducted with respect to the City of Pocatello.
- d. There are currently no pending construction projects which would negatively impact minority communities being performed by Pocatello Regional Transit.

III. INCORPORATION OF THE PROGRAM

The City of Pocatello, (hereinafter sometimes referred to as “Pocatello Regional Transit” or “Recipient”) hereby agrees that, as a condition to receiving any Federal financial assistance from the Department of Transportation, it will comply with Title VI of the Civil Rights Act of 1964, 78 Stat. 252, 42 U.S.C. 2000d-42 U.S.C. 2000d-4 (hereinafter referred to as the “Act”), and all requirements imposed by or pursuant to Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination in Federally-Assisted Programs of the Department of Transportation - Effectuation of Title VI of the Civil Rights Act of 1964 (hereinafter referred to as the “Regulations”), and other pertinent directives.

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 otherwise subjected to discrimination under any program or activity for which the Recipient receives Federal financial assistance from the Department of Transportation, including the Federal Transit Administration, and HEREBY GIVES ASSURANCE THAT it will promptly take any measures necessary to effectuate this agreement. This assurance is required by subsection 21.7(a) of the Regulations.

More specifically, and without limiting the above general assurance, the Recipient hereby gives the following specific assurances with respect to its Federal Transit Administration program:

- a. That the Recipient agrees that each “program” and each “facility”, as defined in subsections 21.23(e) and 21.23(b) of the Regulations will be (with regard to a “program”) conducted, or will be (with regard to a “facility”) operated, in compliance with all requirements imposed by, or pursuant to, the Regulations.
- b. That the Recipient shall insert the following notification in all solicitations for bids for work or material subject to the Regulations and made in connection with all Federal Transit Administration programs and, in adapted form in all proposals or negotiated agreements:

The CITY OF POCATELLO (for Pocatello Regional Transit), in accordance with Title VI of the Civil Rights Act of 1964, 78 Stat. 252, 42 U.S.C. 2000d to 2000d-4 and Title 49, Code of Federal Regulations, Department of Transportation, Subtitle A, Office of the Secretary, Part 21, Nondiscrimination in Federally-Assisted Programs of the Department of Transportation issued pursuant to such Act, hereby notifies all bidders/proposers that it will affirmatively insure that in any contract entered into pursuant to this advertisement, minority business enterprises will be afforded full opportunity to submit bids in response to the invitation and will not be discriminated against on the grounds of race, color, or national origin in consideration for an award.

The persons whose signatures appears below, are authorized to sign these assurances on behalf of the grant applicant or recipient.

Date: 11/17/2020 Skyler Beebe
Skyler Beebe, Public Transit Director
City of Pocatello, Public Transit Department
\\dba Pocatello Regional Transit

Date: November 13, 2020 [Signature]
Brian Blad, Mayor
City of Pocatello

APPROVED BY LEGAL

Date 11/12/20 Atty Bybee

Comments _____

Admin: 11/13/2020

IV. GENERAL GUIDELINES/REQUIREMENTS

a. Annual Certification and Assurance

As stated in Section I, Pocatello Regional Transit shall submit annually, its Title VI assurance, as part of the annual Certification and Assurance submission to the FTA. The most recent submission for PRT was approved by the City of Pocatello; City Council on **November 7, 2019** and was executed and submitted to the FTA **March 20, 2020**.

b. Complaint Procedures

In compliance with 49 CFR Section 21.9(b), City of Pocatello has developed procedures for investigating and tracking Title VI complaints filed against them. Such procedures shall be made available to the public upon request. City of Pocatello complaint procedures and complaint form are contained herein as **APPENDIX C**.

c. Record of Title VI Activities

In compliance with 49 CFR Section 21.9(b), the City of Pocatello shall prepare and maintain a list of any active investigations conducted by entities other than the FTA, lawsuits, or complaints naming the City of Pocatello or Pocatello Regional Transit that allege discrimination on the basis of race, color, or national origin. Such list shall include:

- 1) Date the investigation, lawsuit, or complaint was filed;
- 2) Summary of the allegation(s);
- 3) The status of the investigation, lawsuit, or complaint; and
- 4) Actions taken by the City of Pocatello and/or Pocatello Regional Transit in response to the investigation, lawsuit or complaint.

d. Access for LEP Persons

Pocatello Regional Transit shall take steps to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are Limited English Proficient (LEP). PRT will assist persons with limited English proficiency to participate in the transportation planning process. Pocatello Regional Transit staff will make every effort to provide translators and document translation, where feasible, upon request. Pocatello Regional Transit's Limited English Proficiency (LEP) Plan is contained herein as **APPENDIX D**.

e. Public Notification

In compliance with 49 CFT Section 21.9(d), Pocatello Regional Transit shall provide information to the public regarding its Title VI obligations and apprise members of the public of the protections against discrimination afforded to them by the Title VI. City of Pocatello complaint procedures and public notification information are contained herein as **APPENDIX A**.

f. Additional Information

Pocatello Regional Transit acknowledges that, at the discretion of the FTA, information other than that which is required by FTA C 4702.1A, may be requested of PRT in writing, to investigate complaints of discrimination or to resolve concerns about possible noncompliance with Title VI.

g. Timely Submission

Pocatello Regional Transit acknowledges that its Title VI submissions and/or updates thereto, shall be supplied to the FTA Regional Office once every three (3) years. The submission shall include, but is not limited to:

- 1) A summary of public outreach and involvement activities undertaken since the last submission and a description of steps taken to ensure that minority and low-income people had meaningful access to these activities;
- 2) Pocatello Regional Transit's process for persons with limited English proficiency (LEP);
- 3) Title VI Complaint and Tracking procedures;
- 4) A list of any Title VI investigations, complaints or lawsuits filed since the last submission; and
- 5) A copy of Pocatello Regional Transit's public notice regarding Title VI compliance and public access and instructions to City of Pocatello Title VI complaint procedures.

Portions of the Plan which have not changed since the last submission will not be resubmitted; however, Pocatello Regional Transit shall include a statement to this effect in lieu of copies of the original documents in order to eliminate redundancy in resubmissions.

h. Environmental Analysis of Construction Projects

Pocatello Regional Transit shall integrate an environmental justice analysis into their National Environmental Policy Act (NEPA) documentation of construction projects which require such analysis. If a Categorical Exclusion (CE) is performed, PRT shall complete the FTA's standard CE check-list which includes a section on community disruption and environmental justice. While preparing an Environmental Assessment (EA) or Environmental Impact Statement (EIS), Pocatello Regional Transit shall integrate into its documents, the following:

- 1) A description of the low-income and minority population within the study area affected by the project, and a discussion of the method used to identify this population;
- 2) A discussion of all adverse effects that would affect the identified minority and low-income population;
- 3) A discussion of all positive effects that would affect the identified minority and low-income population;
- 4) A description of all mitigation and environmental enhancement actions incorporated into the project to address the adverse effects, including, but not limited to, any special features of the relocation program that go beyond the requirements of the Uniform Relocation Act and address adverse community effects such as separation or cohesion issues, and the replacement of the community resources destroyed by the project, if applicable;
- 5) A discussion of the remaining effects, if any, and why further mitigation is not proposed; and
- 6) For projects that traverse predominantly minority and low-income and predominantly non-minority and non-low-income areas, a comparison will be completed of mitigation and environmental enhancement actions between the two stated areas. If there is no basis for such a comparison, Pocatello Regional Transit shall describe why this is so.

i. Public Participation

Pocatello Regional Transit shall seek out and consider viewpoints of minority, low-income, and LEP populations in the course of conducting public outreach and involvement activities in regards to proposed transportation decisions. PRT shall make every effort to include the following practices:

- 1) Coordination with individuals, institutions, or organizations in implementing community-based public involvement strategies to reach out to members in the affected minority and/or low-income communities;
- 2) Provision of opportunities for public participation through means other than written communication, such as personal interviews or use of audio or video recording devices to capture oral comments;
- 3) Utilization of locations, facilities and meeting times that are convenient and accessible to low-income and minority communities;
- 4) Utilization of different meeting sizes or formats, or varying the type and number of news media used to announce public participation opportunities; and
- 5) Implementation of DOT's policy guidance regarding Pocatello Regional Transit's responsibilities to LEP persons.

The persons whose signatures appears below, are authorized to sign these assurances on behalf of the grant applicant or recipient.

Date: 11/17/2020 Skyler Beebe
 Skyler Beebe, Public Transit Director
 City of Pocatello, Public Transit Department
 \dba Pocatello Regional Transit

Date: November 13, 2020 [Signature]
 Brian Blad, Mayor
 City of Pocatello

APPROVED BY LEGAL

Date 11/12/20 Atty Bybee

Comments _____

Admin: 11/13/2020

APPENDIX A

This notice is posted in the Pocatello Regional Transit website, on all buses, at the PRT Transit Center and at bus shelters.



Notice of Title VI Compliance Pocatello Regional Transit

Pocatello Regional Transit (PRT) is committed to complying with Title VI of the Civil Rights Act requirements and protecting those accessing transit services from discrimination on the basis of race, color or national origin.

If you believe you have experienced discrimination on the basis of a protected class including your race, color or national origin, please let us know. Contact PRT for more information about its civil rights program, the procedures for registering a complaint, and/or to obtain information in another language:

- Phone: 208-232-5057
- Email: prt@pocatello.us
- PRT's Office: 5815 South 5th Avenue, Pocatello, ID 83204

A complaint may also be filed directly with the Federal Transit Administration (FTA):

Attention: Title VI Program Coordinator, East Building, 5th Floor – TCR, 1200 New Jersey Avenue, SE, Washington, DC 20590

Public Notice of Rights

Public Involvement Requirements

There are many federal and state requirements regarding public access to the planning process. These requirements are designed to ensure that the public is aware of the planning process, has adequate time to comment, and can obtain information on final plans, processes, and data. This section reviews the federal and state requirements.

Federal Requirements

The Federal Regulations require that PRT have a proactive public involvement process that provides complete information, timely public notices, public access to key decisions, and supports early and continued involvement of the public during the planning process. Specific requirements are listed in 23 CFR 450.316.

State Requirements

PRT follows Idaho's Open Meeting Law as outlined in Idaho Code section 67-2340 through 67-2347. The open meeting law requires that all meetings and decisions be open to the public. PRT meetings are held in conjunction with Pocatello City Council meetings and are conducted in rooms and buildings that meet ADA requirements.

Public Access

PRT strives to involve the public in the process and make them aware of the results of our planning process. Public access to not only the final document, but other information is vital in creating an environment of openness. PRT will make every effort to provide the public with information they need to stay current on the process and be a part of the planning process.

Reasonable Access to Technical and Policy Information

PRT staff is available during business hours to discuss technical and policy information. By prior arrangement, PRT staff is available to meet with outside groups after normal business hours. PRT maintains a library of past local and regional documents for review. Copies of most of these documents are free to the public or with minimal reproduction and postage charge. Most recent documents are also available on our web site.

Inspection of Proposed Documents

Proposed documents and amendments will be made available at the PRT offices. They will also be available for review at the following locations:

- City of Pocatello

APPENDIX B

Public Involvement Tools

Web Site

PRT maintains a web site that contains meeting times, agendas, special notices, and draft documents. The web site is growing in popularity but is still only a small part of the overall plan. Web sites tend to be for people looking for more information with specific interest in transportation.

Public Meetings

Public meetings will be advertised in local papers with a purchased advertisement. Notices to interested groups and individuals are also sent using mailing lists available from Bannock Transportation Planning Organization (BTPO, the MPO for PRT). The timing of the meeting is selected to have the largest possible turn out. Public meeting notices should be sent ten days prior to the meeting. In addition, as soon as a meeting is scheduled the meeting should be posted on websites.

Strategies for Outreach to Minority/Low Incomes, Disabled, or Limited English Proficient (LEP) Populations

With the assistance of BTPO, PRT always tries to reach as many people as possible when developing our plans and programs. The current strategies to ensure early and continued Involvement of minorities and low income populations include:

- Public advertisements for public meetings in the general circulation newspaper and regional Spanish speaking newspaper;
- Consider translating bureaucratic or technical documents into lay language and describe why minorities and other groups should be interested in participating;
- Develop a list of agencies who serve identified population to identify information needs and issues of concern, and to provide information on meetings and events to these organizations. This may require providing information to people with visual impairments, non-English and LEP speakers, or to persons without extensive formal schooling;
- Post public meeting notices on our website;
- Use Neighborhood Housing Services and local neighborhood association meetings as forums to distribute information;
- Develop a list of minority civic groups and distribute information through these groups; and
- Ensure public meetings are at convenient times and locations throughout the community if possible. For example, meetings held in minority areas in the evening encourage minority attendance at far higher levels than meetings in downtown offices during the day.

APPENDIX C

Complaint Procedures

Any person or persons who believe that they, individually, or as a member of any specific class of persons, have been subjected to discrimination on the basis of race, color, or national origin may file a written complaint with Pocatello Regional Transit. Complainants have the right to complain directly to the appropriate federal agency (addresses at end of section). Every effort will be made to obtain early resolution of complaints.

1. The complaint must meet the following requirements:
 - a. Complaint shall be in writing and signed by the complainant(s).
 - b. Include the date of the alleged act of discrimination, the date when the Complainant(s) became aware of the alleged act of discrimination, and the date on which that conduct was discontinued or the latest instance of conduct.
 - c. Include a detailed description of the issues, including names and pertinent information of those individuals perceived as parties in the complaint.
 - d. Complaints must be filed within 90 days.
2. Within 30 days of the receipt of a complaint, the Director of Pocatello Regional Transit will review and determine acceptability or need for additional information.
3. Within 30 days of the receipt of a complaint the complainant shall receive acknowledgement, via email or regular mail, either acceptance or rejection of complaint.
4. Complaint must meet the following criteria for acceptance:
 - a. Complaint must be filed within 90 days of the alleged occurrence.
 - b. Allegation must have a basis such as race, color, or national origin.
 - c. Allegation must involve PRT service, for which federal or state funding is involved.
5. Complaint may be dismissed for the following reasons:
 - a. Complainant requests the withdrawal of complaint.
 - b. Complainant fails to respond to request for additional information needed to process the complaint.
 - c. Complainant cannot be located after repeated attempts.
6. PRT Director and the Pocatello City EEO Officer, and when needed the Pocatello Legal Department, will make a determination within 90 days of the receipt of the complaint.
7. Notice of determination will be mailed to Complainant. Notice shall provide information regarding right to appeal and instructions for initiating an appeal, including:
 - a. Reconsideration of the determination when PRT is made aware of new facts.
 - b. Information with regard to the process for submitting same complaint to FTA for investigation.

8. A copy of the complaint and PRT's investigation, determination, and plan of action will be forwarded to FTA within 120 days of the receipt of complaint.
9. A summary of the complaint and the resolution will be included with the Title VI updates to FTA.
10. All complaints will be recorded in a database at PRT offices, and records will be retained for 3 years upon resolution of the complaint.

Idaho Transportation Department
Equal Employment Opportunity Office
Attention: EEO Manager
PO Box 7129, Boise, ID 83707
(208) 334-8852 TDD: (208) 334-4455

Regional Civil Rights Officer
FTA, Office of Civil Rights
915 Second Ave.
Seattle, WA 98174
Tel: 206-220-4462
Fax: 206-220-7959



POCATELLO REGIONAL TRANSIT
City of Pocatello – Public Transit Dept.

TITLE VI COMPLAINT FORM

Pocatello Regional Transit operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act of 1964. If you believe that you have been discriminated against, this form should be completed to register a formal complaint.

If you require any assistance or would like to obtain more information on the complaint process, please contact the PRT Director by calling 208-232-5057, email prt@pocatello.gov, visit pocatellotransit.com or PRT's Transit Center located at 5815 South 5th – Pocatello, ID 83204.

COMPLAINANT INFORMATION

First and Last Name: _____

Mailing Address: _____

City: _____ State: _____ Zip Code: _____

Email: _____

Phone Number (include area code): _____

Preferred Method of Contact (select one): Email Phone Mail

Alternate Format of Form (If none, skip to the next question)

Yes, I need the form in the following format: _____

Are You Filing this Complaint of Your Behalf? Yes No (If YES, please go to next section)

If NO, please provide the following information:

*Your name and relationship: _____

*Please explain why you have filed for a third party: _____

*Have you obtained permission of the aggrieved party if filling on behalf of a third party?

Yes No

OCCURRENCE INFORMATION

I believe the discrimination I experienced was based on (check all that apply):

Race Color National Origin

Date of Alleged Discrimination (Month, Day, Year): _____

Location of Incident: _____

Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include names and contact information of the person(s) who discriminated against you (if known) as well as the names and contact information of any witnesses:

Have you filed this complaint with any other Federal, State, or local agency, or with any State/Federal Court?

Yes No (If YES, check all that apply): Federal Agency Federal Court
 State Agency State Court Local Agency

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

Name of Agency/Court: _____

Mailing Address: _____

City: _____ State: _____ Zip Code: _____

Phone Number (include area code): _____

You may attach any written materials or other information that you think is relevant to the complaint.

Signature: _____ Date: _____

**Signature and Date Required*

Please submit this completed form by mail or email to:

Pocatello Regional Transit

Attn: PRT Director

PO Box 4169

Pocatello, ID 83204

prt@pocatello.us

APPENDIX D

Pocatello Regional Transit
Limited English Proficiency (LEP) Plan



A Department of City of Pocatello
5815 South 5th Avenue
Pocatello, ID 83204

I. INTRODUCTION

This *Limited English Proficiency Plan* has been prepared to address Pocatello Regional Transit's responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited English language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq, and its implementing regulations, which state that no person shall be subjected to discrimination on the basis of race, color or national origin.

Executive Order 13166, titled *Improving Access to Services for Persons with Limited English Proficiency*, indicates that differing treatment based upon a person's inability to speak, read, write or understand English is a type of national origin discrimination. It directs each agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discrimination does not take place. This order applies to all state and local agencies which receive federal funds.

• Plan Summary

Pocatello Regional Transit (PRT) has developed this *Limited English Proficiency Plan* to help identify reasonable steps for providing language assistance to persons with limited English proficiency [LEP] who wish to access services provided. As defined Executive Order 13166, LEP persons are those who do not speak English as their primary language and have limited ability to read, speak, write or understand English. This plan outlines how to identify a person who may need language assistance, the ways in which assistance may be provided, staff training that may be required, and how to notify LEP persons that assistance is available.

In order to prepare this plan, Pocatello Regional Transit used the four-factor LEP analysis, which considers the following factors:

1. The number or proportion of LEP persons in the service area who may be served by PRT.
2. The frequency with which LEP persons come in contact with PRT.
3. The nature and importance of services provided by PRT to the LEP population.
4. The interpretation services available to PRT and overall cost to provide LEP assistance.

A summary of the results of the four-factor analysis is in the following section.

II. MEANINGFUL ACCESS: FOUR-FACTOR ANALYSIS

1. The number or proportion of LEP persons in the service area who may be served or are likely to require Pocatello Regional Transit.

PRT staff reviewed the 2018 U.S. Census Report and determined that 6,037 persons in Bannock County, ID [7.7% of the population] speak a language other than English. Of those 6,037, persons 1,841 [30.5%] have limited English proficiency; that is, they speak English “not well” or “not at all”.

	Bannock County, ID	
	Estimate	
Total:	78,785	
English only	72,748	
Speak a language other than English	6,037	

Spanish:	2,912	3.7%
Limited English speaking household	798	27.4%
English speaking household	2,114	72.6%

Other Indo-European languages:	1,087	1.4%
Limited English speaking household	188	17.3%
English speaking household	899	82.7%

Asian and Pacific Island languages:	993	1.3%
Limited English speaking household	495	49.8%
English speaking household	498	50.2%

Other languages:	1,045	1.3%
Limited English speaking household	360	34.4%
English speaking household	685	65.6%

Source: U.S. Census Bureau, 2018 LANGUAGE SPOKEN AT HOME
 Survey/Program: American Community Survey
 TableID: S1601

2. The frequency with which LEP persons come in contact with Pocatello Regional Transit.

PRT staff reviewed the frequency with which drivers, office staff and maintenance staff have, or could have, contact with LEP persons. To date, PRT has had no requests for interpreters and no requests for translated program documents. PRT drivers, office staff and maintenance staff have had very little contact with LEP persons. PRT does have on staff employees that speak Spanish and Japanese (fluently). These two languages are the more prevalent in this area. We also have access to the Idaho State University for assistance if other needs arise.

3. The nature and importance of services provided by Pocatello Regional Transit to the LEP population.

Public Transit services for persons with limited English proficiency can be very important. There is no large geographic concentration of any type of LEP individuals in the service area for PRT. The overwhelming majority of the population, 92.3%, speak only English. As a result, there are few social service, professional and leadership organizations within the PRT service area that focus on outreach to LEP individuals. PRT and staff are most likely to encounter LEP individuals through office visits, phone conversations, notifications from maintenance staff of impacts on services. PRT does have employees fluent in the Spanish language that are available to assist with translating.

4. The resources available to Pocatello Regional Transit, and overall costs to provide LEP assistance.

PRT reviewed its available resources that could be used for providing LEP assistance, which of its documents would be most valuable to be translated and have created those items. Other language translation, if needed, would be provided through other PRT employees and Pocatello City employees. Idaho State University, located in Pocatello, has additional resources if and when such a need may arise.

III. LANGUAGE ASSISTANCE

A person who does not speak English as their primary language and who has a limited ability to read, write, speak or understand English may be a Limited English Proficient person and may be entitled to language assistance with respect to PRT services. Language assistance can include interpretation, which means oral or spoken transfer of a message from one language into another language and/or translation, which means the written transfer of a message from one language into another language.

How PRT staff may identify an LEP person who needs language assistance:

- Post notice of LEP Plan and the availability of interpretation or translation services free of charge in languages LEP persons would understand.
- All PRT staff will be informally surveyed periodically on their experience concerning any contacts with LEP persons during the previous year.
- When PRT sponsors an informational meeting or event, a staff person may greet participants as they arrive. By informally engaging participants in conversation it is possible to gauge each attendee's ability to speak and understand English. Although translation may not be able to be provided at the event it will help identify the need for future events.

A. Language Assistance Measures-Although there is a very low percentage of LEP individuals in PRT's service area-- that is, persons who speak English "not well" or "not at all-- PRT will strive to offer the following measures:

1. PRT staff will take reasonable steps to provide the opportunity for meaningful access to LEP clients who have difficulty communicating English.
2. The following resources will be available to accommodate LEP persons:
 - i. Volunteer interpreters for the Spanish language are available and will be provided within a reasonable time period.
 - ii. Language interpretation will be accessed for all other languages through a telephone interpretation service.

IV. STAFF TRAINING

The following training will be provided to all staff:

- Information on the Title VI Policy and LEP responsibilities.
- Description of language assistance services offered to the public.
- Documentation of language assistance requests.
- How to handle a potential Title VI/LEP complaint.

All contractors or subcontractors performing work for Pocatello Regional Transit will be required to follow the Title VI/LEP guidelines. PRT will assist all subrecipients with all aspects of Title VI. We will monitor this by reviewing documents and processes that a subrecipient has.

V. TRANSLATION OF DOCUMENTS

- PRT weighed the cost and benefits of translating documents for potential LEP groups. Considering the expense of translating the documents, the likelihood of frequent changes in documents and other relevant factors, at this time it is an unnecessary burden to have any documents translated.
- Due to the very small local LEP population, PRT does not have a formal outreach procedure in place, as of 2015. Translation resources have been identified and are limited in this region. However, when and if the need arises for LEP outreach, PRT will consider the following options:
- When staff prepares a document, or schedules a meeting, for which the target audience is expected to include LEP individuals, then documents, meeting notices, flyers, and agendas will be printed in an alternative language based on the known LEP population.

VI. MONITORING

Monitoring and Updating the LEP Plan- PRT will update the LEP Plan as required. At a minimum, the plan will be reviewed annually, and when we observe a higher concentration of LEP individuals are present in PRT service area. Updates will include the following:

- The number of documented LEP person contacts encountered annually.
- How the needs of LEP persons have been addressed.
- Determination of the current LEP population in the service area.
- Determination as to whether the need for translation services has changed.
- Determine whether local language assistance programs have been effective and sufficient to meet the need.
- Determine whether PRT financial resources are sufficient to fund language assistance resources needed.
- Determine whether PRT fully complies with the goals of this LEP Plan.
- Determine whether complaints have been received concerning the agency's failure to meet the needs of LEP individuals.

VII. DISSEMINATION OF POCATELLO REGIONAL TRANSIT LEP PLAN

- Post signs at PRT Center notifying LEP persons of the LEP Plan and how to access language services.
- State on agendas and public notices in the language that LEP persons would understand that documents are available in that language upon request at City Hall.

APPENDIX E

Pocatello Regional Transit
System-Wide Service Standards and Policies



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INTRODUCTION

It is the policy of the Pocatello Regional Transit (PRT) to provide quality service to all customers regardless of race, color, national origin, or income. This document establishes system-wide service standards and policies as required by the Federal Transit Administration (FTA) for all of PRT's fixed-route transit services. In addition to serving as a guide for staff and stakeholders, this document is intended to satisfy Title VI of the Civil Rights Act of 1964, Executive Order 12898, and related civil rights laws, which help to assure that PRT's services are provided in a non-discriminatory manner, specifically with regards to minority and low-income populations.

The FTA requires PRT to establish the following four service standards and two service policies:

1. Vehicle Loading Standards
2. Headway Standards
3. On-Time Performance Standards
4. Service Availability Standards
5. Vehicle Assignment Policy
6. Transit Amenity Distribution Policy

Title VI requires PRT to prepare a Service Monitoring Report that evaluates the fixed-route transit system against PRT's adopted service standards and policies on a route-by-route basis, broken down by minority and non-minority.

This document sets forth the guidelines for PRT's performance monitoring program.

SYSTEM-WIDE SERVICE STANDARDS AND POLICIES

1. Vehicle Loading Standards

PRT collects ridership data on fixed-route buses and strives to provide a seat to most passengers. During peak periods, it is expected that some passengers may have to stand, but the number of standing passengers will be kept to reasonable levels. Also, services will be designed so that when passengers do have to stand, they will not have to stand for long periods of time.

Two different techniques are used to keep passenger loads within acceptable levels. The first is to match vehicle type with ridership levels, and to use larger vehicles on higher ridership routes. The second method is to provide more frequent service, with service frequencies set to keep passenger loads within the limits as set forth below and following:

Maximum Passenger Loading (as a Percentage of Seating Capacity)

Time Period	Local Bus
Peak Periods	120%
Off-Peak Periods	100%
All Day	100%

Maximum Passenger Loads by Vehicle Type

Bus Type	Seats (Typical)	Maximum Load
35' Transit Bus	32	50
30' Transit Bus	28	42
27' Transit Bus	18	26
25' Transit Bus	16	24
Transit Van	10	10

2. Vehicle Headway Standards

PRT bases bus headways on both policy and productivity. The minimum service frequency guidelines define the minimum service frequencies at which each type of service should operate. Based on demand and budget, many services could operate more frequently, and in these cases, the service frequencies would be based on ridership and loading levels. PRT's headway standards are set forth below and following:

Minimum Service Frequencies (Minutes)

Time Period	Local Bus
Weekdays	
AM Peak	60
Midday (Base)	60
PM Peak	60
Evening / Night	60
Saturdays	
All Day	60

3. On-Time Performance Standards

On-time performance for PRT buses is measured at time points. A vehicle is considered on time if it leaves its time point exactly on time and up to 5 minutes late. For the last time point on each trip, the arrival time is used instead of the leave time. PRT's target is for the fixed-route bus system to be 80 percent on-time or better. For Title VI purposes, all routes are expected to be within 10 percent of the actual system-wide average or better.

Percentage of On-Time Trips by Route Classification

On-Time Trips	Local Bus
Percentage	80%

4. Service Availability Standard

PRT provides fixed-route bus transit service in the Cities of Pocatello and Chubbuck.

PRT has defined its service area based on the areas it provides service in as mentioned above and a three-quarters of a mile coverage area from its existing route structure. Three-quarters of a mile is the standard coverage used by both the Americans with Disabilities Act as well as FTA's National Transit Database to define a transit agency's service area. For the purposes of estimating likely transit riders, however, FTA suggests that transit agencies assume walk distances of a quarter mile for bus routes.

Based on this information, PRT has determined that its standard and definition of service availability for each mode will be as follows:

PRT will distribute its fixed-route bus transit service so that 75 percent of all residents within the service area are within a 1/2 mile walk of bus service.

5. Transit Amenity Distribution Policy

Installation of transit amenities along bus routes are based on the number of passenger boarding's and transfers at stops and stations along these routes. PRT's main transit amenity is bus benches and shelters. PRT's standard is that bus benches and shelters are located at bus stops which typically serve 50 or more average weekday boarding passengers or which serve concentrations of elderly or persons with disabilities. PRT strives to place benches at bus stops in areas with adequate space if there's a reasonable need and based on availability.

6. Vehicle Assignment Policy

Vehicle assignment refers to the process by which vehicles are placed into service at garages and routes throughout the system. It is PRT's policy to randomly assign buses to runs. Exceptions to this rule are required by other factors such as bus service span, fuel capacity, fulfilling ADA regulations, passenger capacity, or special bus length or turning radius (smaller buses).

TITLE VI SERVICE MONITORING

Requirements

At least once every three years, PRT is required to prepare a Title VI Service Monitoring report that evaluates the fixed-route transit system against PRT's service standards on a route-by-route basis, broken down by minority and non-minority routes. PRT is required to have a policy for identifying and correcting disparate impacts on minority populations and to submit to FTA a copy of the resolution verifying the PRT Board of Commissioners consideration, awareness, and approval of the report's findings. Although not a Title VI requirement, PRT addresses disproportionate burdens on low-income populations in this process as well.

Regular monitoring of PRT service may also prompt changes to PRT's service. However, Title VI and federal Environmental Justice law also require PRT to prepare an equity assessment prior to adopting any major service changes to service or to the fare structure.

Minority and Low-Income Definitions

FTA defines a minority person as anyone who is American Indian or Alaska Native, Asian, Black or African American, Hispanic or Latino, or Native Hawaiian or other Pacific Islander.

FTA defines a low-income person as a person whose household income is at or below the U.S. Department of Health and Human Services (HHS) poverty guidelines. The HHS definition varies by year and household size. FTA encourages transit agencies to use a locally-developed threshold for low-income status, provided that the threshold is at least as inclusive as the HHS poverty guidelines.

Data and Methodology

FTA defines a minority route as a route that has at least one-third of its total revenue mileage in a census block group with a percentage of minority population that exceeds the percentage of minority population in the transit service area. PRT uses demographic data from the U.S. Census Bureau's American Community Survey to make this determination, as well as passenger surveys that may be used instead for routes where the demographics of the actual ridership may not match the area that is travelled through.

FTA recommends a Title VI Service Monitoring analysis be conducted on a sample of routes, which must include minority and non-minority routes. Although no numerical requirement exists, FTA guidance notes that the greater the sample size, the more reliable the results. In accordance with these guidelines, PRT will usually include a majority of all regular routes, with the exception of demonstration projects, supplemental routes, contract service, special service, etc.