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# *Title VI Implementation Plan*

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## *City of Cottonwood / Cottonwood Area Transit*



*Getting you where you want to go!*

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# Title VI Policy Statement

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

City of Cottonwood / Cottonwood Area Transit also assures that every effort will be made to prevent discrimination through the impacts of its programs, policies and activities on minority and low-income populations. Furthermore, City of Cottonwood / Cottonwood Area Transit will take reasonable steps to provide meaningful access to services for persons with limited English proficiency.

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

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Diane Joens, Mayor

# Title VI Notice to the Public

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## Notifying the Public of Rights Under Title VI City of Cottonwood / Cottonwood Area Transit

The City of Cottonwood / Cottonwood Area Transit operates its programs and services without regard to race, color, national origin or disability in accordance with Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act of 1990 (ADA). Any person who believes she or he has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the City of Cottonwood / Cottonwood Area Transit.

For more information on the City of Cottonwood / Cottonwood Area Transit's civil rights program, and the procedures to file a complaint, contact Iris Dobler, Human Resources Manager, (928) 634-0060, (TTY 711); email [idobler@cottonwoodaz.gov](mailto:idobler@cottonwoodaz.gov) ; or visit our administrative office at 816 N. Main Street, Cottonwood, AZ. For more information, visit [cottonwoodaz.gov/cat.php](http://cottonwoodaz.gov/cat.php).

A complainant may file a complaint directly with the Arizona Department of Transportation (ADOT) or the Federal Transit Administration (FTA) by filing a complaint directly with the corresponding offices of Civil Rights: **ADOT**: ATTN: Title VI Program Manager 206 S. 17<sup>TH</sup> Ave MD 155A RM: 183 Phoenix AZ, 85007 **FTA**: ATTN: Title VI Program Coordinator, East Building, 5<sup>th</sup> Floor-TCR 1200 New Jersey Ave., SE Washington DC 20590

If information is needed in another language, contact (928) 634-2287. Para información en Español llame: Cherice Bishop, CAT Office Administrator.

# Title VI Notice to the Public -Spanish

## Aviso al Público Sobre los Derechos Bajo el Título VI City of Cottonwood / Cottonwood Area Transit

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

Para obtener más información sobre la City of Cottonwood / Cottonwood Area Transit's programa de derechos civiles, y los procedimientos para presentar una queja, contacte Iris Dobler, Human Resources Manager, (928) 634-0060, (TTY 711); o visite nuestra oficina administrativa en 816 N. Main Street, Cottonwood, AZ. Para obtener más información, visite [cottonwoodaz.gov/cat.php](http://cottonwoodaz.gov/cat.php).

El puede presentar una queja directamente con Arizona Department of Transportation (ADOT) o Federal Transit Administration (FTA) mediante la presentación de una queja directamente con las oficinas correspondientes de Civil Rights: ADOT: ATTN Title VI Program Manager 206 S. 17th Ave MD 155A Phoenix AZ, 85007 FTA: ATTN Title VI Program Coordinator, East Building, 5th Floor –TCR 1200 New Jersey Ave., SE Washington DC 20590

*The above notice is posted in the following locations: City and CAT offices, CAT Buses, on Schedules.*

*This notice is posted online at [cottonwoodaz.gov/cat.php](http://cottonwoodaz.gov/cat.php).*

# Title VI Complaint Procedures

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These procedures provide guidance for all complaints filed under Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act of 1990 (ADA) as they relate to any program or activity that is administered by City of Cottonwood / Cottonwood Area Transit including consultants, contractors and vendors. Intimidation or retaliation as a result of a complaint is prohibited by law. In addition to these procedures, complainants reserve the right to file a formal complaint with other State or Federal agencies or to seek private counsel for complaints alleging discrimination. Every effort will be made to resolve complaints at the lowest possible level.

- (1) Any person who believes he and/or she has been discriminated against on the basis of race, color, national origin, or disability may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form.
- (2) Formal complaints must be filed within 180 calendar days of the last date of the alleged act of discrimination or the date when the alleged discrimination became known to the complainant(s), or where there has been a continuing course of conduct, the date on which the conduct was discontinued or the latest instance of the conduct.
- (3) Complaints must be in writing and signed by the complainant(s) and must include the complainant(s) name, address and phone number. The Title VI contact person will assist the complainant with documenting the issues if necessary.
- (4) Allegations received by fax or e-mail will be acknowledged and processed, once the identity of the complainant(s) and the intent to proceed with the complaint have been established. For this, the complainant is required to mail a signed, original copy of the fax or email transmittal for the complaint to be processed.
- (5) Allegations received by telephone will be reduced to writing and provided to the complainant for confirmation or revision before processing. A complaint form will be forwarded to the complainant for him/her to complete, sign and return for processing.
- (6) Once submitted City of Cottonwood / Cottonwood Area Transit will review the complaint form to determine jurisdiction. All complaints will receive an acknowledgement letter informing her/him whether the complaint will be investigated by the City of Cottonwood / Cottonwood Area Transit or submitted to the State or Federal authority for guidance.
- (7) City of Cottonwood / Cottonwood Area Transit will notify the ADOT Civil Rights Office of ALL Title VI complaints within 72 hours via telephone at 602-712-8946; email at [civilrightsoffice@azdot.gov](mailto:civilrightsoffice@azdot.gov).

- (8) City of Cottonwood / Cottonwood Area Transit has 30 days to investigate the complaint. If more information is needed to resolve the case, the Authority may contact the complainant. The complainant has 30 business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within 30 business days, the Authority can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.
- (9) After the investigator reviews the complaint, she/he will issue one of two letters to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. An LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member or other action will occur. If the complainant wishes to appeal the decision, she/he has 30 days after the date of the letter or the LOF to do so.
- (10) A complainant dissatisfied with City of Cottonwood / Cottonwood Area Transit decision may file a complaint with the Arizona Department of Transportation (ADOT) or the Federal Transit Administration (FTA) offices of Civil Rights: **ADOT**: ATTN Title VI Program Manager 206 S. 17<sup>TH</sup> Ave MD 155A RM: 183 Phoenix AZ, 85007 **FTA**: Attention Title VI Program Coordinator, East Building, 5<sup>th</sup> Floor-TCR 1200 New Jersey Ave., SE Washington DC 20590
- (11) A copy of these procedures can be found online at: [cottonwoodaz.gov/cat.php](http://cottonwoodaz.gov/cat.php).

# Title VI Complaint Form

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

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

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**Section V:**

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

Yes       No

If yes, check all that apply:

Federal Agency: \_\_\_\_\_

Federal Court: \_\_\_\_\_  State Agency: \_\_\_\_\_

State Court : \_\_\_\_\_  Local Agency: \_\_\_\_\_

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

Name:

Title:

Agency:

Address:

Telephone:

**Section VI:**

Name of agency complaint is against:

Name of person complaint is against:

Title:

Location:

Telephone Number (if available):

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

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

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

City of Cottonwood / Cottonwood Area Transit Human Resources Manager

816 N Main St

Cottonwood, AZ, 86326

(928) 634-0060

idobler@cottonwoodaz.gov

A copy of this form can be found online at cottonwoodaz.gov

# Title VI Investigations, Complaints, and Lawsuits

This form will be submitted annually. If no investigations, lawsuits, or complaints were filed, a blank form will be submitted.

Description/Name	Date (Month, Day, Year)	Summary (include basis of complaint: race, color, national origin or disability)	Status	Action(s) Taken (Final findings?)
<b>Investigations</b>				
1)				
2)				
<b>Lawsuits</b>				
1)				
2)				
<b>Complaints</b>				
1)				
2)				

XX City of Cottonwood / Cottonwood Area Transit has not had any Title VI complaints, investigations, or lawsuits in 2014-2015.

*City of Cottonwood /  
Cottonwood Area  
Transit  
Public Participation  
Plan*

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City of Cottonwood / Cottonwood Area Transit is engaging the public in its planning and decision-making processes, as well as its marketing and outreach activities. The public will be invited to participate in the process whether through public meetings or surveys. As an agency receiving federal financial assistance, City of Cottonwood / Cottonwood Area Transit made the following community outreach efforts:

- (1) Transit Advisory Meetings – Public meetings held every other month with the majority stakeholders to discuss transit operations and plans. Usually held in the large conference room at the Cottonwood Recreation Center.
- (2) Transportation Manager has participated in numerous community events where transportation issues were the focus of the event such as roundtables, community action group events, special meetings at senior centers and senior community centers.
- (3) City Council meetings when transit issues are being discussed as part of the agenda.
- (4) Coordination meetings with NACOG and other transit providers every other month.
- (5) Transportation Planning Organization meetings for Yavapai County every other month in the Yavapai County offices.
- (6) Work with Chamber of Commerce, Catholic Charities, Goodwill, DES and others to provide transit passes for special events such as Job Fairs, employment events, job interviews, job training, and educational events.
- (7) Ads appear in several relocation guides and on associated websites for people looking to move into the area.
- (8) All meeting notices and special event notices appear in the local papers, are run as public service announcements on the local radio stations, are posted in city offices and primary pass purchasing offices, as well as on all the buses.

In the upcoming year, City of Cottonwood / Cottonwood Area Transit will make the following community outreach efforts:

- (1) Transit Advisory Meetings – Public meetings held every other month with the majority stakeholders to discuss transit operations and plans. Usually held in the large conference room at the Cottonwood Recreation Center.
- (2) Transportation Manager has participated in numerous community events where transportation issues were the focus of the event such as roundtables, community action group events, special meetings at senior centers and senior community centers.
- (3) City Council meetings when transit issues are being discussed as part of the agenda.
- (4) Coordination meetings with NACOG and other transit providers every other month.
- (5) Transportation Planning Organization meetings for Yavapai County every other month in the Yavapai County offices.

- (6) Work with Chamber of Commerce, Catholic Charities, Goodwill, DES and others to provide transit passes for special events such as Job Fairs, employment events, job interviews, job training, and educational events.
- (7) Ads appear in several relocation guides and on associated websites for people looking to move into the area.
- (8) All meeting notices and special event notices appear in the local papers, are run as public service announcements on the local radio stations, are posted in city offices and primary pass purchasing offices, as well as on all the buses.

**Public Meetings:**

- (1) Public meetings are scheduled to increase the opportunity for attendance by stakeholders and the general public. This may require scheduling meetings during non-traditional business hours, holding more than one meeting at different times of the day or on different days, and checking other community activities to avoid conflicts.
- (2) When a public meeting or public hearing is focused on a planning study or program related to a specific geographic area or jurisdiction within the region, the meeting or hearing is held within that geographic area or jurisdiction.
- (3) Public meetings are held in locations accessible to people with disabilities and are located near a transit route when possible.

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

# City of Cottonwood / Cottonwood Area Transit

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*Limited English Proficiency Plan*

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*Getting you where you want to go!*

City of Cottonwood / Cottonwood Area Transit has developed the following Limited English Proficiency Plan (LEP) to help identify reasonable steps to provide language assistance for LEP persons seeking meaningful access to City of Cottonwood / Cottonwood Area Transit services as required by Executive Order 13166. A Limited English Proficiency person is one who does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English.

This plan details procedures on how to identify a person who may need language assistance, the ways in which assistance may be provided, training to staff, notification to LEP persons that assistance is available, and information for future plan updates. In developing the plan while determining the City of Cottonwood / Cottonwood Area Transit's obligation to provide LEP services, the City of Cottonwood / Cottonwood Area Transit undertook a U.S. Department of Transportation four-factor LEP analysis which considers the following:

- 1) The number or proportion of LEP persons eligible in the City of Cottonwood / Cottonwood Area Transit service area who maybe served or likely to encounter by City of Cottonwood / Cottonwood Area Transit program, activities, or services;
- 2) The frequency with which LEP individuals come in contact with an City of Cottonwood / Cottonwood Area Transit services;
- 3) The nature and importance of the program, activities or services provided by the City of Cottonwood / Cottonwood Area Transit to the LEP population; and
- 4) The resources available to City of Cottonwood / Cottonwood Area Transit and overall costs to provide LEP assistance. A brief description of these considerations is provided in the following section.

A statement in Spanish will be included in all public outreach notices. Every effort will be made to provide vital information to LEP individuals in the language requested.

#### **Safe Harbor Provision**

City of Cottonwood / Cottonwood Area Transit complies with the Safe Harbor Provision, as evidenced by the number of documents available in the Spanish language. With respect to Title VI information, the following shall be made available in Spanish:

- (1) Title VI Notice
- (2) Complaint Procedures
- (3) Complaint Form

In addition, we will conduct our marketing (including using translated materials) in a manner that reaches each LEP group. Vital Documents include the following:

- (1) Notices of free language assistance for persons with LEP

- (2) Notice of Non-Discrimination and Reasonable Accommodation
- (3) Outreach Materials
- (4) Bus Schedules
- (5) Route Changes
- (6) Public Hearings**

# Non-elected Committees Membership Table

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A subrecipient who selects the membership of transit-related, non-elected planning boards, advisory councils, or committees must provide a table depicting the membership of those organizations broken down by race. Subrecipients also must include a description of the efforts made to encourage participation of minorities on these boards, councils, and committees.

X City of Cottonwood / Cottonwood Area Transit does NOT select the membership of any transit-related committees, planning boards, or advisory councils.

# Monitoring for Subrecipient Title VI Compliance

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X City of Cottonwood / Cottonwood Area Transit does NOT monitor subrecipients for Title VI compliance.

# Fixed Route Transit Provider Analysis

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**Fixed route:** Public transit service (other than by aircraft) provided on a repetitive, fixed-schedule basis along a specific route, with vehicles stopping to pick up passengers.

A sub-recipient providing fixed route service, as defined above, must determine the distribution of transit amenities or the vehicle assignments for each mode in a non-discriminatory manner. The sub-recipient must develop policies to ensure service is not distributed on the basis of race, color, or national origin.

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

1) *Vehicle Load for Each Mode*

- A) CAT, All Routes – 1:1, both peak and off peak. We generally have more seating than passengers. This is local fixed route service.
- B) Lynx – 1:1, both peak and off peak. While we occasionally will have a standee, this is rare and only happens when we have to substitute a smaller bus when the large bus is down for scheduled maintenance. This is our intercity service.

2) *Vehicle Headway for Each Mode*

- A) CAT, Local Service – 45 minutes, all times
- B) Lynx, Intercity Service – 45 minutes, peak; 90 minutes off-peak, weekends.

3) *On Time Performance for Each Mode*

- A) CAT, local service – 99% on-time, 0-5 minutes within scheduled time being “on time”
- B) LYNX, intercity service – 92% on-time, 0-5 minutes within scheduled being “on time”

4) *Service Availability for Each Mode*

- A) CAT, Local Service – Monday – Friday, 6:45am – 6:45pm
- B) LYNX, Intercity Service – Monday – Friday, 6:00am – 7:15pm, 2 buses  
Saturday, 6:00am – 7:15pm, 1 bus  
Sunday, 7:30am – 6:00pm, 1 bus
- C) All services run most holidays except Thanksgiving, Christmas, and New Years’ Day.

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

1) *Transit amenities for each mode*

A) CAT – The following items are provided to riders:

- a. Shelters – Lighted shelters are located along the fixed routes in areas where there are two or more routes in close proximity or where two routes share a stop. They are usually at places where riders may transfer from one route to another. Trash receptacles are provided at the shelters and on all buses.
- b. Signs – Designated stops have signs to let the public know where they are located. These stops are located so that the bulk of the riding public is no more than two or three blocks from a designated stop.
- c. Schedules – All buses have schedules for all services operated by CAT and LYNX and also have schedules for the Yavapai Apache Nation Transit, which connects with CAT/Lynx in Cottonwood. Schedules contain time tables for the various stops and routes, as well as maps of the routes. Schedules may also be obtained at the Cottonwood City Hall, Human Resources/Finance Office, Library, Recreation Center, Chamber of Commerce Center, and most hotels/motels in the CAT service area.

B) LYNX – The following items are provide to riders:

- a. Shelters – Lynx uses the shelters at the Cottonwood Library and the Circle K stops in Cottonwood. The City of Sedona has provided several shelters along 89A in West Sedona and along 179 South toward the Village of Oak Creek. They plan to install more as funding is secured.
- b. Signs – Designated stops have signs to let the public know where they are located. These stops are located along the main route through Sedona to the Uptown Municipal Parking Lot, a designated park and ride facility for the Lynx.
- c. Schedules – All buses have schedules for all services operated by CAT and LYNX and also have schedules for the Yavapai Apache Nation Transit, which connects with CAT/Lynx in Cottonwood. Schedules contain time tables for the various stops and routes, as well as maps of the routes. Schedules may also be obtained at the Sedona City Hall, Library, Chamber of Commerce Center, and most hotels/motels in the LYNX service area.

2) *Vehicle assignments for each mode*

Generally, our buses are fairly well interchangeable on any service, with the exception of the two 30 passenger Navistar buses used exclusively on the LYNX service. The rest are 19-passenger cutaway vans that we use interchangeably on the routes to maximize the mileage for each bus.

# Board Approval for the Title VI Program

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ATTACH A COPY OF THE BOARD MEETING MINUTES HERE