



**Title VI Program
for
Jump Around Carson
Federal Fiscal Year 2020-2022**



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1. TITLE VI PROGRAM OVERVIEW

1.1 PLAN STATEMENT AND OBJECTIVES

The Carson Area Metropolitan Planning Organization (CAMPO) provides funding for operation of the Jump Around Carson (JAC) transit system, which includes fixed route and paratransit services for the Carson City area. As a condition of receiving Federal Transit Administration (FTA) financial assistance from the U.S. Department of Transportation (USDOT) to operate these services, transit agencies must ensure their programs, policies, and activities comply with USDOT's Title VI regulations. The following program was developed to guide CAMPO in its administration and management of Title VI-related activities, and details how CAMPO and JAC meet the requirements under Title 49 CFR part 21. FTA Circular 4702.1B, was consulted to ensure compliance with USDOT's Title VI regulations.

Section 601 of Title VI of the Civil Rights Act of 1964 states the following:

“No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.”

1.2 POLICY

CAMPO is committed to ensuring no person on the basis of race, color, or national origin will be excluded from participation or subjected to discrimination in the level and quality of transit services or related benefits provided by CAMPO's employees, affiliates, or contractors.

1.3 OBJECTIVES

The Carson Area Metropolitan Planning Organization (CAMPO) intends to:

- Ensure the level and quality of transportation service is provided without regard to race, color or national origin;
- Identify and address, as appropriate, disproportionately high and adverse human health and environmental effects, including social and economic effects of programs and activities on minority populations and low-income populations;
- 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; and
- Ensure meaningful access to programs and activities by persons with limited English proficiency.

2. TITLE VI REQUIREMENTS & RESPONSES

2.1 GENERAL REPORTING REQUIREMENTS

Chapter III of FTA Circular 4702.1B provides guidance on the reporting requirements for recipients and subrecipients of FTA funding to ensure their activities comply with USDOT Title VI regulations. Below are summaries of each requirement and how the Carson Area Metropolitan Planning Organization's Title VI Program fulfills each requirement.

2.1.1 Requirement to provide Title VI assurances

Requirement: In accordance with Title 49 CFR Section 21.7(a), every application for financial assistance from FTA must be accompanied by an assurance that the applicant will carry out the program in compliance with USDOT's Title VI regulations. This requirement shall be fulfilled when the applicant/recipient submits its annual certifications and assurances to FTA.

Response: CAMPO shall continue to submit its annual Title VI assurance as part of its annual Certification and Assurance submission to the Federal Transit Administration (FTA) in TrAMS.

2.1.2 Requirement to prepare and submit a Title VI Program

Requirement: FTA requires all direct and primary recipients document their compliance with USDOT's Title VI regulations by submitting a Title VI Program to their FTA regional civil rights officer once every three (3) years or as otherwise directed by FTA. For all recipients (including subrecipients), the Title VI Program must be approved by the recipient's board of directors or appropriate governing entity or official(s) responsible for policy decisions prior to submission to FTA. Recipients shall submit a copy of the board resolution, meeting minutes, or similar documentation with the Title VI Program as evidence that the board of directors or appropriate governing entity or official(s) has approved the Title VI Program. FTA will review and concur or request the recipient provide additional information.

Response: CAMPO will continue to submit a Title VI Program to the FTA Region IX civil rights officer once every three (3) years.

2.1.3 Requirement to notify beneficiaries of protection under Title VI

Requirement: The Title VI Program shall include recipient's Title VI notice to the public that indicates the recipient complies with Title VI, and informs members of the public of the protections against discrimination afforded to them by Title VI. A list of locations where the notice is posted needs to be provided.

Response: CAMPO staff oversees the JAC public transportation system in the urbanized area of Carson City, and has included a notice of beneficiary rights under Title VI, per the guidelines in Appendix B of Circular 4702.1B. This notice is in English and Spanish and is posted on the CAMPO website (www.carsonareampo.com) and the JAC website (www.ridejac.com). A screen shot of the website is provided in Attachment A. In addition, a notice is publicly displayed in the JAC administrative office and on JAC route brochures (available on every transit vehicle and is distributed to more than 30 locations convenient to the public throughout Carson City).

2.1.4 Requirement of Title VI complaint procedures and complaint form

Requirement: All recipients shall develop and display procedures to the public for filing, investigating, and tracking Title VI complaints. Recipients must develop a Title VI complaint form, and the form and procedure for filing a complaint shall be available on the recipient's website.

Response: CAMPO has Title VI complaint procedures and complaint form available to the public (see Attachment B). The complaint procedures and form are available in English and Spanish on the JAC website, www.ridejac.com.

2.1.5 Requirement to record and report transit-related Title VI complaints, investigations, and lawsuits

Requirement: To comply with the reporting requirements of Title 49 CFR Section 21.9(b), FTA requires all recipients to prepare and maintain a list of alleged discrimination on the basis of race, color, or national origin; active investigations conducted by entities other than FTA; lawsuits; and complaints naming the recipient. This list shall include the date of when the investigation, lawsuit, or complaint was filed; a 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.

Response: CAMPO maintains a list of any active investigations conducted by entities other than FTA, lawsuits, or complaints naming CAMPO or JAC that allege discrimination on the basis of race, color or national origin (see Attachment B). This list is maintained according to the guidelines of Appendix E of the FTA Circular 4702.1B. CAMPO will maintain permanent records of all related documents. All complaints are directed to the Transportation Manager.

CAMPO has not received any Title VI complaints of discrimination and does not have any active investigations, complaints or lawsuits that allege discrimination on the basis of race, color or national origin to report at this time.

2.1.6 Requirement to promote inclusive public participation

Requirement: The content and considerations of Title VI, the Executive Order on Limited English Proficiency (LEP), and the USDOT LEP Guidance shall be integrated into each recipient's established public participation plan or process (i.e., the document that explicitly describes the proactive strategies, procedures, and desired outcomes that underpin the recipient's public participation activities). Recipients have wide latitude to determine how, when, and how often specific public participation activities take place, and which specific measures are most appropriate. FTA Circular 4703.1 includes many examples of effective strategies for engaging minority and low-income populations.

Response: CAMPO's Public Participation Plan, updated in August 2019, is provided for reference in Attachment C. The plan was developed in accordance with the guidelines under the Final Rule of 23 CFR §450.316 Metropolitan Transportation Planning and is in compliance with all federal laws and regulations, including adherence to Title VI of the Civil Rights Act of 1964 and the Americans with Disabilities Act of 1990. CAMPO ensures that minority, LEP, and low-income populations, as with all members of the public, are empowered to participate in decisions related to CAMPO and the JAC transit system.

Recently, JAC has relocated its operations building and has developed a JAC Transit Development and Coordinated Human Services Plan (TDCHSP). The TDCHSP serves three primary objectives: (1) a short-range (1-5 year) planning document; (2) a long-range (10-20 year) planning document; and (3) a coordinated public transit-human services planning document.

Below is a list of public outreach events regarding the relocation of the JAC building and the transit plan:

- May 5, 2017 New JAC building public notification mailers
- April – May 2019 JAC Online Survey
- April 29, 2019 JAC Stakeholder Workshop
- May 14, 2019 JAC Public Workshop

2.1.7 Requirement to provide meaningful access to LEP persons

Requirement: Consistent with Title VI of the Civil Rights Act of 1964, USDOT'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 considered limited-English proficient (LEP).

Response: CAMPO has updated its Language Assistance Plan (LAP) for JAC (see Attachment D) to include data from the *2017 American Community Survey (ACS) Block Group 5-Year Estimates*. The LAP applies the Four Factor Framework specified by the U.S. Department of Transportation (DOT), and includes an implementation plan consistent with DOT Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons.

2.1.8 Requirement to encourage minority representation on planning and advisory bodies

Requirement: 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.

Response: CAMPO does not have a transit-related, non-elected planning board, advisory council, or similar board, the membership of which is selected by CAMPO. It therefore does not have a racial breakdown of membership of those committees to depict. Any such body/ies that is/are created in the future will encourage the participation of minorities, and the relevant table will be created to show the racial composition of its/their members.

2.1.9 Requirement to provide assistance to subrecipients

Requirement: Title 49 CFR Section 21.9(b) states that if "a primary recipient extends Federal financial assistance to any other recipient, such other recipient shall also submit such compliance reports to the primary recipient as may be necessary to enable the primary recipient to carry out its obligations under this part." Primary recipients should assist their subrecipients in complying with USDOT's Title VI regulations, including the general reporting requirements. Assistance shall be provided to the subrecipient as necessary and appropriate by the primary recipient.

Response: CAMPO currently has no subrecipients, but will provide assistance as required should it extend Federal financial assistance to any other recipient.

2.1.10 Requirement to monitor subrecipients

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

Response: CAMPO currently has no subrecipients, but will monitor subrecipients for compliance as required should it extend Federal financial assistance to any other recipient.

2.1.11 Requirement relating to determination of site or location of facilities

Requirement: Title 49 CFR Section 21.9(b)(3) states, “In determining the site or location of facilities, a recipient or applicant may not make selections with the purpose or effect of excluding persons from, denying them the benefits of, or subjecting them to discrimination under any program to which this regulation applies, on the grounds of race, color, or national origin; or with the purpose or effect of defeating or substantially impairing the accomplishment of the objectives of the Act or this part.” Title 49 CFR part 21, Appendix C, Section (3)(iv) provides, “The location of projects requiring land acquisition and the displacement of persons from their residences and businesses may not be determined on the basis of race, color, or national origin.” For the purposes of this requirement, “facilities” does not include bus shelters, as these are transit amenities and are covered in Chapter IV, nor does it include transit stations, power substations, etc. as those are evaluated during project development and the National Environmental Policy Act (NEPA) process. Facilities included in this provision include, but are not limited to, storage facilities, maintenance facilities, operations centers, etc.

Response: CAMPO will ensure that both environmental analysis and Title VI environmental justice requirements are incorporated into the scope of work for all facilities projects requiring land acquisition and the displacement of persons from their residences and businesses:

1. CAMPO will 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. CAMPO will engage in outreach to persons potentially impacted by the siting of facilities. The Title VI equity analysis will compare the equity impacts of various siting alternatives, and the analysis will occur before selection of the preferred site.
2. When evaluating locations of facilities, CAMPO will give attention to other facilities with similar impacts in the area to determine if any cumulative adverse impacts might result. Analysis will be done at the Census tract or block group level where appropriate to ensure that proper perspective is given to localized impacts.

3. If CAMPO determines the location of the project will result in a disparate impact on the basis of race, color, or national origin, CAMPO will only locate the project in that location if there is a substantial legitimate justification for locating the project there, and where there are no alternative locations that would have a less disparate impact on the basis of race color or nation origin. CAMPO will show how both tests are met and will consider and analyze alternatives to determine whether those alternatives would have less of a disparate impact on the basis of race, color, or national origin, and then implement the least discriminatory alternative.

JAC has completed construction of a new operations building on October 10, 2019. The project repurposed an existing City facility to an administrative office and bus yard for the JAC transit system. The facility conversion primarily consisted of grading and paving land for transit buses and employee parking. The project included relatively minor modifications to the main building on the site to make it more suitable for transit administrative and operational purposes. The project exists entirely on a City-owned parcel across the street from the previous JAC facility within the same Census Block Group. The Census Block for the old and new parcel is nearest to the same residential/populated Census Block. The disturbance to the land was minor, and the project does not encroach on the surrounding environments. No land acquisition was required for this project and **no** displacement of persons from their residences and/or businesses took place as a result of this project.

As part of the Carson City permitting process, a Special Use Permit was required. As required by municipal code, the following findings are required to be found in the affirmative by the Carson City Planning Commission to approve a Special Use Permit:

- The project will not be detrimental to the use, peaceful enjoyment, economic value, or development of surrounding properties or the general neighborhood; and is compatible with and preserves the character and integrity of adjacent development and neighborhoods or includes improvements or modifications either on-site or within the public right-of-way to mitigate development related to adverse impacts such as noise, vibrations, fumes, odors, dust, glare or physical activity.
- The project will have little or no detrimental effect on vehicular or pedestrian traffic.
- The project will not overburden existing public services and facilities, including schools, police and fire protection, water, sanitary sewer, public roads, storm drainage, and other public improvements.
- The project will not be detrimental to the public health, safety, convenience and welfare.
- The project will not result in material damage or prejudice to other property in the vicinity, as a result of proposed mitigation measures.

2.1.12 Requirement to provide additional information upon request

Requirement: FTA may request, at its discretion, information other than that required by Circular 4702.1B from a recipient in order for FTA to investigate complaints of discrimination or to resolve concerns about possible noncompliance with USDOT's Title VI regulations.

Response: CAMPO will fully cooperate with any FTA investigation of discrimination complaints to the extent required by Title VI regulations.

2.2 REQUIREMENTS FOR FIXED ROUTE TRANSIT PROVIDERS

Chapter IV of FTA Circular 4702.1B discusses the additional reporting requirements for all recipients and subrecipients of FTA funding that operate fixed route transit service, to ensure that each agency complies with USDOT Title VI regulations. JAC does not currently meet the threshold for additional requirements applicable to transit providers that operate 50 or more fixed route vehicles in peak service and are located in a UZA of 200,000 or more in population.

Below is a summary of the requirements and how the Carson Area Metropolitan Planning Organization's Title VI Program fulfills each of those requirements.

2.2.1 Requirement to set system-wide service standards and policies

Requirement: Title 49 CFR Section 21.5 states the general prohibition of discrimination on the grounds of race, color, or national origin. Section 21.5(b)(2) specifies that a recipient shall not "utilize criteria or methods of administration which have the effect of subjecting persons to discrimination because of their race, color, or national origin, or have the effect of defeating or substantially impairing accomplishment of the objectives of the program with respect to individuals of a particular race, color, or national origin." Section 21.5(b)(7) requires recipients to "take affirmative action to assure that no person is excluded from participation in or denied the benefits of the program or activity on the grounds of race, color, or national origin." Finally, Appendix C of Title 49 CFR part 21 provides in Section (3)(iii) that "[n]o 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."

All fixed route transit providers shall set service standards and policies for each specific fixed route mode of service they provide. Fixed route modes of service include but are not limited to, local bus, express bus, commuter bus, bus rapid transit, light rail, subway, commuter rail, passenger ferry, etc. These standards and policies must address how service is distributed across the transit system, and must ensure that the manner of the distribution affords users access to these assets.

These system-wide service standards differ from any standards set by the American Public Transit Administration (APTA) Standards Development Program and other standards development organizations (SDOs), in that they will be set by individual transit providers and will apply agency-wide rather than industry-wide.

Providers of fixed route public transportation shall also adopt system-wide service policies to ensure service design and operations practices do not result in discrimination on the basis of race, color, or national origin. Service policies differ from service standards in that they are not necessarily based on a quantitative threshold.

Although the FTA requires establishment of a set of standards and policies for particular indicators, providers of fixed route service may set additional standards and policies for additional indicators as appropriate.

Response: JAC provides fixed route transit service and has a set of system-wide service standards and policies which are executed by JAC staff and overseen by CAMPO staff. The only fixed route mode provided by JAC is a local bus service, but should any other fixed route modes be implemented in the future, a separate set of standards and policies will be developed for that mode. Attachment E contains service standards and policies based on guidelines established in Circular 4702.1B.

For the set of system-wide service standards, CAMPO has established quantitative standards for the following indicators:

- Vehicle load
- Vehicle headways
- On-time performance
- Service availability

For the service policies, CAMPO has established qualitative policies for the following service indicators:

- Distribution of transit amenities
- Vehicle assignment


Attachment A - Website Documentation

Carson City Municipal Code
City Facts
City Services
Climate And Weather
Community Links
Services
Education Services Information Sources
Health Services Information Sources
JAC - Jump Around Carson
Routes & Schedules
Fares
Transfers
About JAC
FAQs
JAC Assist
Bus & Shelter Advertising
Contact Us
En Español
Nevada Rural Housing Authority
Relocation Services Information Sources
Social Services Information Sources
Utilities Services Information

Residents » Community Links » Services » JAC - Jump Around Carson »

About JAC

Font Size: + - + Share & Bookmark Feedback Print



About JAC

[Rider Alerts](#) / [Holiday Schedule](#) / [Community Events](#) / [Beneficiary Rights Under Title VI](#) / [ADA Policies and Procedures for Fixed Route Service](#)

JAC (Jump Around Carson) is Carson City, Nevada's public transit system serving the community with a fleet of bright green and purple buses that feature a sleek, hopping jackrabbit (a Northern Nevada icon). JAC began operating in October 2005 and is governed by the Carson City Regional Transportation Commission. The JAC system features the JAC fixed route system as well as JAC Assist, a curb-to-curb program that provides transportation for eligible persons with disabilities.

Ridership continues to grow as residents discover the convenience and value of the bus system for going to work, school, shopping, medical appointments and recreation facilities. Strategically placed stops throughout the community make it easy for passengers to conveniently visit a number of the city's most popular destinations. Fares are only \$1.00 per one-way trip for adults; and seniors, persons with disabilities and youth may ride for only \$0.50 per one-way trip.

Interested in finding out more about JAC? Click [here](#) for the JAC Fact Sheet.

Rider Alerts

Detour List

JAC makes every effort to operate as scheduled, but schedules may vary due to weather, traffic or other conditions, including construction. If construction or special events should affect any of JAC's routes, detours will be listed on the JAC Home page. Check back occasionally to see if any construction detours may affect your trip. Please understand the start and end times of the detours may change without notice due to construction or other delays.

Weather Alert

Since JAC operates at the base of the Sierra Nevada Mountains, the buses are equipped with chains to safely navigate snowy conditions. However, please be advised that bus service may be delayed without notice due to snow and/or icy conditions. We appreciate your understanding.

Holiday Schedule

JAC observes the following holidays and therefore, no service is available and the office is closed.

New Year's Day
Memorial Day
Independence Day
Labor Day
Thanksgiving
Christmas Day

Community Events

Throughout the year, JAC attends community events to give Carson City residents and visitors a chance to meet the bus drivers, check out the inside of the buses, and get more information on routes and schedules. If you are planning an upcoming event and would like JAC to attend, please contact the office staff at (775) 841-RIDE.

Beneficiary Rights Under Title VI

JAC is committed to ensuring that no person shall, on the basis 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 assistance, and that no discrimination takes place in any of the programs it and its subrecipients operate. To obtain more information on JAC's nondiscrimination obligations, send a written request to the address below. If anyone feels that he/she or others protected by Title VI have been discriminated against, a complaint may be filed. To file a complaint, send a written notice to Transportation Manager, 3505 Butti Way, Carson City, NV, 89701, RE: Title VI Complaint. A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.

ADA Policies and Procedures for Fixed Route Service

In addition to the requirements under the Dept. of Transportation (DOT) Americans with Disabilities Act (ADA) for the complementary paratransit service, JAC also follows DOT ADA requirements for its fixed route service. These are provided here so that our customers may have an even knowledge base with the employees serving them. [Click here](#) to view these policies and procedures.

Nevada 2-1-1

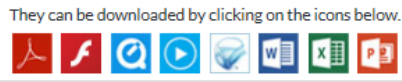
Seniors receive free rides on the JAC system through a grant provided by the State of Nevada Aging and Disability Services Division (ADSD). The ADSD has partnered with Nevada 2-1-1 in order to provide Nevada's most comprehensive resource directory for health and human services. For more information about this program and to access additional resources, please visit their website at www.nevada211.org.

Short Range Transit Development Plan

The Short Range Transit Development Plan (TDP) is a document that serves to evaluate the existing JAC transit system, and also as a short-term strategic guide for public transportation in the Carson City area. The TDP has been developed (and will be updated) to meet local priorities for Carson City's existing transportation services, including capital improvements, operating changes to the existing system, and how Carson City will fund existing program needs over a five year period. The TDP was developed with consideration of public comments that were obtained during the development of the document, and can be viewed [here](#).

[JAC Home](#) / [Routes & Schedules](#) / [Fares](#) / [Transfers](#) / [About JAC](#) / [FAQs](#) / [JAC Assist](#) / [Bus & Shelter Advertising](#) / [Contact Us](#) / [En Español](#)

Free viewers are required for some of the attached documents.
They can be downloaded by clicking on the icons below.



Attachment B
Complaint Procedures and Forms



**LIST OF TRANSIT-RELATED TITLE VI INVESTIGATIONS,
COMPLAINTS, AND LAWSUITS**

At this time, CAMPO has no active or closed Title VI investigations, complaints, or lawsuits.

CAMPO acknowledges per FTA Circular 4702.1B, “all recipients are required 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 FTA and entities other than FTA;
- Lawsuits; and
- Complaints naming the recipient

Below is the list used for tracking investigations, complaints, and lawsuits in the event such action is brought to CAMPO:

Investigations, Complaints, and Lawsuits

	Date (month, day, year)	Summary (include basis of complaint: race, color, or national origin)	Status	Action(s) taken
Investigations				
1.				
2.				
Complaints				
1.				
2.				
Lawsuits				
1.				
2.				



TITLE VI COMPLAINT PROCEDURES

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by CAMPO or the JAC transit system may file a Title VI complaint by completing and submitting CAMPO's Title VI Complaint Form. The complaint form may be downloaded from the CAMPO website (www.CarsonAreaMPO.com) or JAC website (www.RideJAC.com), or by contacting the Transportation Manager at 775-887-2355. Federal law requires complaints to be filed within one hundred eighty (180) calendar days of the last alleged incident. Complaints should be mailed to:

Attn: Transportation Manager
3505 Butti Way
Carson City, NV 89701
Fax: 775-887-2112

Title VI complaints received by CAMPO shall be documented by the representative receiving the complaint on a form provided for this purpose. Documentation shall include the name of the person filing the complaint, the time, date and place the alleged incident occurred, as well as any other information necessary to fully explain the situation. The complaint shall be dated and assigned a control number for tracking purposes.

All Title VI complaints shall be investigated and addressed with a formal written response within 90 days of the date the complaint is received. If more information is needed to resolve the case, CAMPO may contact the complainant. The complainant has 30 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 days, CAMPO can administratively close the case. A case can be administratively closed if the complainant no longer wishes to pursue their case.

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 there was not a Title VI violation and 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. If required, the LOF with corrective actions taken will be forwarded to the Federal Transit Administration.

A person may also file a complaint directly with the Federal Transit Administration, at FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590.

Subrecipients of CAMPO shall use the Title VI complaint investigation and tracking procedures developed by CAMPO.



TITLE VI COMPLAINT FORM

Staff Use Only

Date of Complaint Received: _____ Tracking No. _____

All Title VI complaints shall be investigated and addressed with a formal written response within **90 days** of the date the complaint is received. If more information is needed to resolve the case, CAMPO may contact the complainant. The complainant has 30 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 days, CAMPO can administratively close the case. A case can be administratively closed if the complainant no longer wishes to pursue their case.

---Additional Information available in Title VI Complaint Procedures---

Name of Complainant _____

Address _____ Phone No. _____

Email Address _____

Accessible Format Requirements? Large Print Audio Tape TDD Other _____

Person Discriminated Against (if other than Complainant) _____

Address _____ Phone No. _____

Email Address _____

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: Yes No

Date, Time & Place Incident Occurred _____

Nature of Complaint Race Color National Origin

Details of Complaint: please 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.

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

Signature

Date

Please submit this form in person, or mail to:

Carson Area Metropolitan Planning Organization
Transportation Manager
3505 Butti Way Carson City, NV 89701

Complaint Taken By _____

INVESTIGATION _____

ACTION RECOMMENDED _____

By _____

RECORD OF FINAL ACTION _____

By _____



TÍTULO VI PROCEDIMIENTOS DE QUEJA

Cualquier persona que crea que ha sido discriminada por motivos de raza, color o origen nacional por CAMPO o por el sistema de tránsito de JAC puede presentar una queja de Título VI completando y enviando el Formulario de quejas de Título VI de CAMPO. El formulario de queja puede ser descargado del sitio web de CAMPO (www.CarsonAreaMPO.com) o del sitio web de JAC (www.RideJAC.com), o comunicándose con el Coordinador de Tránsito al 775-283-7583. La ley federal exige que las quejas se presenten antes de los ciento ochenta (180) días de calendario después del presunto incidente. Las quejas deben enviarse por correo A:

Attn: Transportation Manager
3505 Butti Way
Carson City, NV 89701
Fax: 775-887-2112

Las quejas del Título VI recibidas por CAMPO deberán ser documentadas por el representante que recibe la queja en un formulario proveído para este propósito. La documentación debe incluir el nombre de la persona que presenta la queja, la hora, la fecha y el lugar donde ocurrió el presunto incidente, así como cualquier otra información necesaria para explicar completamente la situación. La queja se fechará y se le asignará un número de control para fines de seguimiento. El demandante recibirá una carta de reconocimiento informándole a él / ella si la queja será investigada por CAMPO.

Todas las quejas del Título VI se investigarán y se atenderán con una respuesta formal por escrito dentro de los 90 días de la fecha en que se recibió la queja. Si se necesita más información para resolver el caso, CAMPO puede contactar al demandante. El demandante tiene 30 días a partir de la fecha de la carta para enviar la información solicitada al investigador asignado al caso. Si el demandante no se pone en contacto con el investigador o no recibe la información adicional dentro de los 30 días, CAMPO puede cerrar administrativamente el caso. Un caso también puede ser cerrado administrativamente si el demandante ya no desea continuar con su caso.

Después de que el investigador revisa la queja, él / ella emitirá una de las siguientes dos cartas al demandante: una carta de terminación o una carta de seguimiento (LOF). Una carta de terminación resume las alegaciones y establece que no hubo una violación del Título VI y que el caso se cerrará. Un LOF resume las acusaciones y las entrevistas sobre el supuesto incidente y explica si se producirá alguna acción disciplinaria, capacitación adicional del miembro del personal o otra acción. Si el demandante desea apelar la decisión, tiene 30 días después de la fecha de la carta o LOF para hacerlo. Si es necesario, el LOF con las acciones correctivas tomadas se enviará a la Administración Federal de Tránsito.

Una persona también puede presentar una queja directamente con la Administración Federal de Tránsito, en la Oficina de Derechos Civiles del TLC, 1200 New Jersey Avenue SE, Washington, DC 20590.

Los subbeneficiarios de CAMPO utilizarán los procedimientos de investigación y seguimiento de reclamos del Título VI desarrollados por CAMPO.



TÍTULO VI FORMULARIO DE QUEJA

Staff Use Only

Date of Complaint Received: _____ Tracking No. _____

All Title VI complaints shall be investigated and addressed with a formal written response within **90 days** of the date the complaint is received. If more information is needed to resolve the case, CAMPO may contact the complainant. The complainant has 30 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 days, CAMPO can administratively close the case. A case can be administratively closed if the complainant no longer wishes to pursue their case.

---Additional Information available in Title VI Complaint Procedures---

Fecha en que se presentó la queja _____ Número de seguimiento de la queja _____

Nombre del demandante _____

Dirección _____ Número de Teléfono _____

Dirección de correo electrónico _____

Requisitos de formato accesible? Impresión grande _____ Cinta de Audio _____ TDD _____ Otro _____

Persona que fue discriminada (si no es el demandante)

Dirección _____ Número de Teléfono _____

Dirección de correo electrónico _____

Explique por qué ha solicitado una tercera persona:

Confirme que ha obtenido el permiso de la parte perjudicada si está presentando una demanda en nombre de un tercero: Sí _____ No _____

Fecha, hora y lugar en que ocurrió el incidente _____

Naturaleza de la queja Raza _____ Color _____ Origen nacional _____

Detalles de la queja: Por favor describa a todas las personas que estuvieron involucradas. Incluya el nombre y la información de contacto de la persona(s) que lo discriminó (si lo conoce), así como los nombres y la información de contacto de los testigos. Si necesita más espacio, utilice la parte de atrás de este formulario.

Puede adjuntar cualquier material escrito u otra información que considere relevante para su reclamo.

Firma y fecha son requeridas a continuación

Firma

Fecha

Someta este formulario en persona o envíelo por correo a:

Carson Area Metropolitan Planning Organization Transportation Manager
3505 Butti Way Carson City, NV 89701

Queja tomada por _____

INVESTIGACIÓN _____

ACCIÓN
RECOMENDADA _____

Hecha por _____

REGISTRÓ DE ACCIÓN FINAL

Hecha por _____

Attachment C
CAMPO's Public Participation Plan

CARSON AREA METROPOLITAN PLANNING ORGANIZATION



PUBLIC PARTICIPATION PLAN

Amended 5/12/10
Administrative Modification 7/3/12
Amended 7/14/19

This report was funded in part through grants from the Federal Highway Administration and Federal Transit Administration, U.S. Department of Transportation. The views and opinions of the Carson Area Metropolitan Planning Organization expressed herein do not necessarily state or reflect those of the U.S. Department of Transportation.

Carson Area Metropolitan Planning Organization
Serving Carson City, Northern Douglas County and Western Lyon County

Introduction

In 2002, the US Census Bureau announced the release of the Carson City Urbanized Area geography (according to the 2000 Census), with a population that had surpassed the threshold of 50,000. The urbanized area consists of Carson City, as well as the adjacent, relatively densely inhabited portions of Douglas and Lyon Counties. As a result of surpassing the population criteria of 50,000, the area was required to form a Metropolitan Planning Organization for its transportation planning and programming activities. The Nevada Governor, in accordance with Federal regulations, designated the Carson Area Metropolitan Planning Organization (CAMPO) as a newly formed MPO in the State of Nevada. In 2012, the Census Bureau updated the urbanized area boundaries based on data collected during the 2010 Census, though changes were minor.

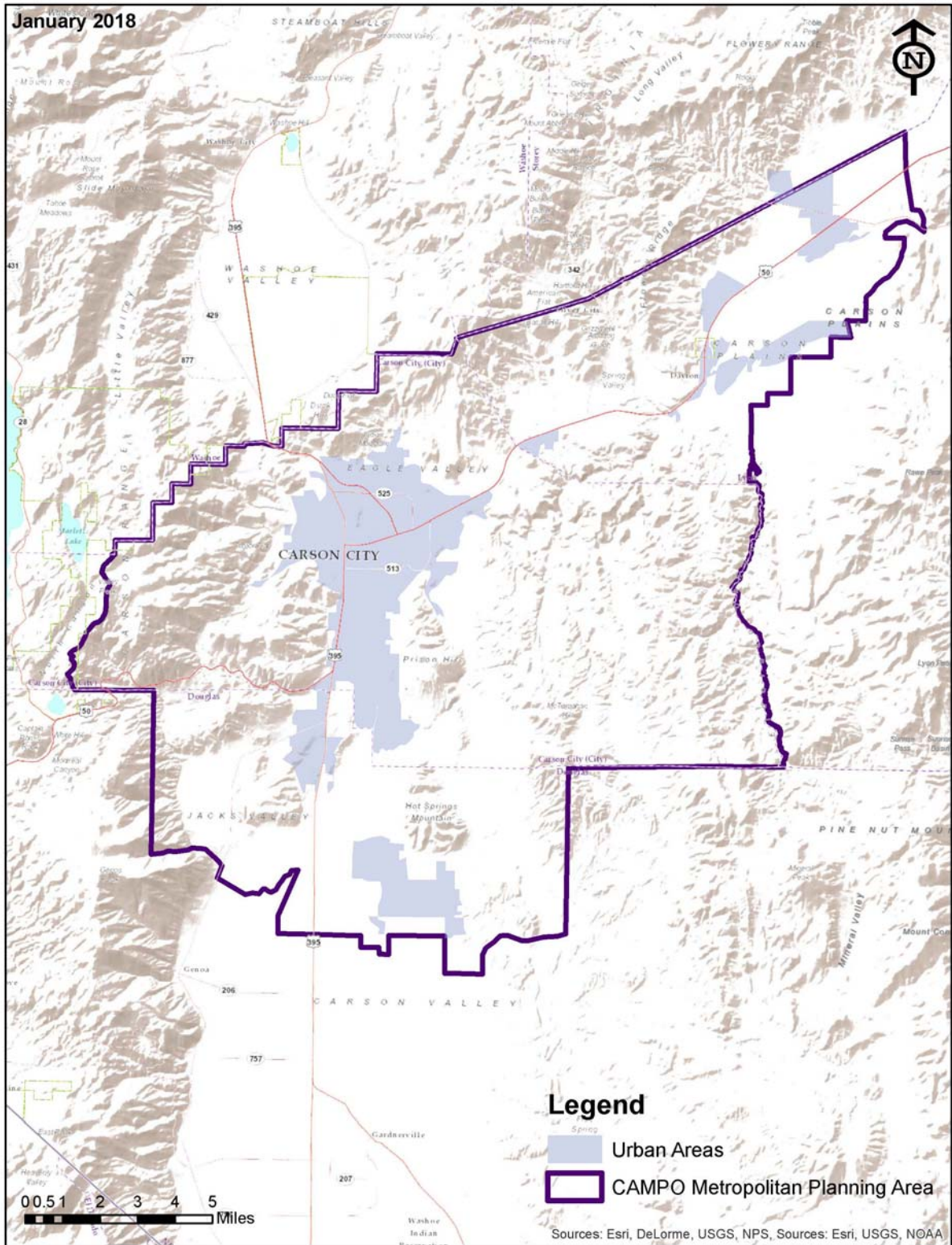
CAMPO carries out transportation planning activities within the Metropolitan Planning Area (MPA), shown in Figure 1. The MPA encompasses the urbanized area and a larger area that is likely to continue to urbanize within the next 20 years. Currently, there are two urban clusters, as defined by the US Census Bureau, within the MPA. They are the Johnson Lane area in Douglas County and Dayton in Lyon County.

CAMPO is governed by a seven-member Policy Board consisting of representatives of Carson City, Douglas County, and Lyon County. A representative of the Nevada Department of Transportation (NDOT) serves as an ex-officio, non-voting member. Carson City operates a transit system within the CAMPO planning area. The representation on the MPO Policy Board from Carson City also represents the interests of the transit system.

The primary responsibility of CAMPO is the continuous, cooperative, and comprehensive multimodal transportation planning process for the urbanized area. Among other state and federal requirements, this includes the development of a Regional Transportation Plan (RTP) with a minimum 20-year planning horizon and a Transportation Improvement Program (TIP) with a minimum of a four-year horizon.

On August 10, 2005, the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU) was signed into law. With guaranteed funding for highways, highway safety, and public transportation totaling \$244.1 billion nationwide, SAFETEA-LU represented the largest surface transportation investment in U.S. history. This document was created in accordance with the SAFETEA-LU requirements regarding public participation in the metropolitan transportation planning process. On October 1, 2012, Moving Ahead for Progress in the 21st Century (MAP-21) took effect, reaffirming the role of MPOs. On December 4, 2015, the Fixing America's Surface Transportation (FAST) Act was signed into law. The FAST Act confirms all the performance based planning requirements established under the previous transportation act, MAP-21, with no changes to the public participation processes. This Plan satisfies the requirements for public participation as outlined in current federal legislation. The following sections further describe the procedures, strategies, and desired outcomes of the public participation process as it pertains to citizen and interested party input in the CAMPO transportation planning process.

Figure 1



Objectives of the Public Participation Plan

The Public Participation Plan (PPP) has been drafted in accordance with the guidelines under the Final Rule of 23 CFR §450.316 Metropolitan Transportation Planning. CAMPO is committed to compliance with all federal laws and regulation throughout the public participation process including adherence to Title VI of the Civil Rights Act of 1964 and the Americans with Disabilities Act of 1990. The following is a list of objectives that CAMPO has committed to achieve through the Public Participation Plan.

1. Notification of the Public and Targeted Groups
2. Solicited Input
3. Demonstrated Consideration
4. Continued Evaluation

These four general objectives are further expanded upon in the corresponding sections below as strategies with their corresponding outcomes (bulleted).

1. Notify all citizens and interested parties of metropolitan planning issues and processes and provide access to information and public participation activities in a timely manner.
 - Except in an emergency, written notice of all meetings will be given at least three (3) working days before the meeting.
 - Agendas shall include the time and location of CAMPO meetings, will be posted in multiple locations, and will be made available upon request. This policy is in accordance with the Nevada open meetings laws (NRS: Chapter 241 – Meetings of State and Local Agencies).
 - All agendas/meeting notices and, to the extent possible, all other technical information will be made electronically available on the official CAMPO website at www.carsonareampo.com. All agenda materials will be written in a concise manner that can be easily understood by the general public.
 - CAMPO currently maintains a diverse mailing list of potential interested parties including various federal, state and local agencies, organizations, private providers, minority groups, tribes, and local media. Meeting agendas are physically or electronically mailed to every individual on the mailing list.
 - All meetings of the CAMPO board will be open and public and all persons shall be permitted to attend any meeting of the CAMPO board. Reasonable efforts will be made to assist and accommodate persons with physical disabilities desiring to attend.
 - All CAMPO meetings will be held at convenient and accessible locations in close proximity to public transportation with consideration and accommodation made for individuals covered under the Americans with Disabilities Act (ADA).
 - CAMPO Policy Board meetings are generally held on the second Wednesday of each month. With the exception of a scheduling conflict, meetings are typically held in the Sierra Room at the Community Center at 851 East

William Street in Carson City. The Community Center and Sierra Room are ADA accessible.

- All agendas are posted a minimum of three (3) working days prior to the meeting (as per NRS 241) at the following locations.
 - CARSON CITY CITY HALL, 201 North Carson Street
 - CARSON CITY LIBRARY, 900 North Roop Street
 - CARSON CITY COMMUNITY CENTER, 851 East William Street
 - CARSON CITY PUBLIC WORKS, 3505 Butti Way
 - CARSON CITY DEVELOPMENT SERVICES, PLANNING DIVISION, 108 E. Proctor Street
 - DOUGLAS COUNTY EXECUTIVE OFFICES, 1594 Esmeralda Avenue, Minden
 - LYON COUNTY MANAGER'S OFFICE, 27 South Main Street, Yerington
 - NEVADA DEPARTMENT OF TRANSPORTATION, 1263 S. Stewart Street, Carson City
 - CARSON CITY WEBSITE: www.carson.org/agendas
 - OFFICIAL STATE WEBSITE: <https://notice.nv.gov>
 - Every special meeting of the CAMPO Board or other project-specific public open house events will be publicly noticed using a 1/8th page display advertisement in the *Nevada Appeal*. CAMPO may also notice the event in multiple newspapers, may issue a press release summarizing the content of the event, and may post information on Carson City social media, other major publications or other websites. In addition, documentation will be prepared and distributed to all contacts on a CAMPO maintained list.
 - An effort will be made to meet requests for CAMPO documents made by Limited English Proficient (LEP) individuals and persons with visual impairments. CAMPO will seek the services of an interpreter/translator as needed.
2. Solicit the participation of citizens and interested parties in the transportation planning process and provide a reasonable opportunity to comment on proposed planning documents and projects.
- CAMPO Staff will create Advisory Workgroups specific to the development and adoption of transportation planning documents as required and other special studies as warranted. Advisory Workgroups will generally consist of representatives from federal, state, and local government agencies; tribes; private transportation providers; the freight industry; and local organizations with knowledge, expertise, and/or an interest in the subject matter of the planning document that is being developed or updated.
 - A period devoted to comment from the public and interested parties will be provided at all CAMPO meetings.

- Comments may be submitted at any time through the CAMPO website, by email to comments@carsonareampo.com, or through Carson City's virtual City Hall available online at Carson.org/Connect.
- CAMPO staff will participate in ongoing coordination and engagement with the Nevada Department of Transportation (NDOT), other Regional Transportation Commissions (RTCs), Federal Highway Administration (FHWA), Federal Transit Authority (FTA), the Washoe Tribe, local jurisdictions, and other interested transportation agencies and organizations.
- Significant updates to CAMPO documents, excluding administrative modifications, will be given a minimum 30-day public review and comment period; with the exception of the Transportation Improvement Program, which shall be given a minimum of 14 days for review and public comment, and this Public Participation Plan, which will be given a minimum of 45 days for review and public comment. All public comment and review periods will be adequately noticed prior to the official opening. Copies of the approved participation plan shall be provided to the FHWA and the FTA for informational purposes and shall be posted on the World Wide Web, to the maximum extent practicable.
 - An administrative modification, as defined in 23 CFR §450.104, is a minor revision to a long-range metropolitan transportation plan or Transportation Improvement Program (TIP) that includes minor changes to project/project phase costs, minor changes to funding sources of previously-included projects, and minor changes to project/project phase initiation dates. An administrative modification is a revision that does not require public review and comment or redemonstration of fiscal constraint.
- CAMPO will follow the same criteria for an administrative modification that the Nevada Department of Transportation has adopted, which has been approved by the Federal Highway Administration. An administrative modification, as it pertains to the Transportation Improvement Program (TIP), will be applied under the following situations.
 1. When there is a change in a public funding category with no change in the priority of a project in the TIP.
 2. When a project is moved from one year of the TIP to another year of the TIP, either forward or back.
 3. When a positive cost estimate change representing either less than \$5 Million or less than 20% of the total project cost is requested/anticipated.
 4. When a positive or negative change in the un-programmed balance forward is received.
 5. When a positive or negative change in the anticipated fund allocation is received.
 6. When a project is added to use Federal Funds for repayment of previously authorized work and all repayments will come from unallocated funds.
 7. When a new planning study is identified.
 8. When a project is Advance Constructed.

- In the event that the final draft of a document significantly differs than the preliminary draft at the close of a public comment period, an additional opportunity to review and comment will be provided following the completion of the revised draft.
- When applicable, and to the extent possible, CAMPO will employ visualization techniques in the form of maps, graphs and other techniques in an effort to best convey information being presented on transportation planning documents and related issues to citizens and interested parties. Information will be presented in a clear, concise manner and all technical terms will be defined.
- CAMPO will identify and consider the needs of those traditionally underserved by existing transportation systems and those that may face challenges in accessing employment and other services, as appropriate to specific planning activities.
- CAMPO will seek the services of an interpreter for public meetings when necessary or requested by any member of the public to the extent practicable.

CAMPO staff will produce and distribute information periodically across the following additional outlets:

- A 1/8th page display advertisement in the *Nevada Appeal*. CAMPO may also notice the event in multiple newspapers, may issue a press release summarizing the content of the event, and may post information on Carson City social media, other major publications or other websites.
- Electronic newsletters containing plan/project status reports, upcoming opportunities for public participation, and solicitations for contracts/services, etc.
- Social Media, including Carson City and Public Works Facebook pages.
- CAMPO staff may employ the use of public feedback surveys to be distributed to members of the public, known interested parties, made available on Carson City's website and posted to social media and/or other news outlets for the purposes of soliciting a broad range of public input for a targeted planning effort or project.

3. Demonstrate explicit consideration to public input received.

- CAMPO staff will address any questions or comments received in a timely and courteous manner.
- CAMPO will demonstrate explicit consideration to all public input received during the development of any transportation planning document. Staff will consider citizen and interested party comments before making a recommendation to the CAMPO Board.
- The extent to which any comments from the public or an interested party are considered will be documented and explained in the record of public comment.

Attachment D - Language Assistance Plan

Improving Access for Persons Identified as Limited English Proficient (LEP)

Four Factor Analysis

The Carson Area Metropolitan Planning Organization (CAMPO) has conducted this analysis to meet requirements under Title VI of the Civil Rights Act of 1964, which seeks to improve access to services for persons identified as Limited English Proficient (LEP). The purpose is to ensure that no person shall, on the basis 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.

CAMPO has conducted the following analysis for its the Jump Around Carson (JAC) public transportation system, using the four factors identified by the Department of Transportation's (DOT) Executive Order to take reasonable steps to ensure meaningful access to their programs and activities by LEP persons.

Factor One: The number and proportion of LEP persons served or encountered in the eligible service population.

Task 1, Step 1: Examine prior experiences with LEP individuals

JAC serves a largely English-speaking community; however, Carson City has experienced growth in the Hispanic population over recent years. JAC transit operators and customer service representatives were surveyed in January 2018 about their interactions with LEP persons, and reported common interaction with persons speaking Spanish as their primary language. 47 percent of transit employees surveyed indicated that language assistance was needed for the services JAC provides.

In discussions with the employees, LEP individuals primarily request information on bus routes, schedules, fares, and transfers. Much of this information is provided on the JAC website in Spanish and by request.

In discussions with the employees, bus routes 2A and 2B had a significant population of Spanish-speaking persons.

Task 1. Step 2: Become familiar with data from the U.S. Census.

As part of the FFY 2020-2022 Title VI update, the *2017 American Community Survey (ACS) Block Group 5-Year Estimates*, was used to obtain household language data for the Jump Around Carson Service Area. At the time of this report, the 2017 ACS was the most current population and housing data available.

Task 1. Step 2-A: Identify the geographic boundaries of the area that your agency serves.

The Jump Around Carson Service Area is defined as a ¾ mile buffer from JAC's four fixed routes; an area encompassing approximately 21 square miles. A map of JAC's Service Area is provided in Appendix A.

Task 1, Step 2-B: Obtain Census data on the LEP population in your service area.

Census data on the LEP population in the JAC Service Area is provided below:

Total Service Area Households	23,428	100%
English Only	18,696	79.8%
Language other than English	4,732	20.2%
Limited English Speaking	1,092	4.7%
Spanish	3,500	14.9%
-Speak English less than "very well"	877	3.7%
Other Indo-European languages	609	2.5%
-Speak English less than "very well"	141	0.6%
Asian and Pacific Islander languages	521	2.2%
-Speak English less than "very well"	52	0.2%
Other languages	102	0.4%
-Speak English less than "very well"	22	0.1%

**Source: 2017 American Community Survey Block Group 5-Year Estimates*

Task 1. Step 2C: Analyze the data you have collected.

Limited English Proficient (LEP) persons are described as those who speak English less than “very well.” Below are findings from the data.

- In the JAC Service Area, there are 23,428 households
- 20.2% (4,732) of the total households speak a language other than English
- After English, Spanish is the second most common language at 14.9% of the total households in the Service Area
- 4.7% (1,092) of the households in the Service Area are identified as LEP
- Of the 1,092 of LEP Households:
 - 877 households (3.7% of total households) are Spanish speaking
 - 141 households (0.6% of total households) are Indo-European
 - 52 households (0.2% of total households) are Asian & Pacific Islander
 - 22 households (0.1% of total households) are other languages

Task 1. Step 2D: Identify any concentrations of LEP persons within your Service Area.

A census block group map showing the distribution of LEP households in relation to the JAC bus routes is attached to this report (see Appendix B). Appendix B illustrates a concentration of LEP households in the northeastern area of the Service Area. The map also shows that all four routes service an area of LEP concentration to some extent. As a result, a continued effort to provide JAC material in Spanish is necessary.

Task 1. Step 3: Consult state and local sources of data.

CAMPO staff has consulted the *2017 Nevada Education Data Book*, which supports a conclusion that Spanish-speaking persons comprise the greatest number of LEP individuals in Carson City. As shown in a bar chart from the document (see Appendix C), the language spoken at home by the Nevada Early Childhood Education (ECE) Program parents and guardians ranges from 30-48% Spanish from 2008-2015. “Other” languages over this same span account for 5% of parents and guardians speaking a language other than English or Spanish.

In a review of Nevada’s statewide demographics, roughly 12% of residents, 5 years of age and older, are identified as LEP. This is compared to 4.6% in the JAC Service Area. Spanish-speaking LEP persons in Nevada comprise 72.4% of the total LEP population. This is compared to 80% of the total LEP population in the JAC Service Area.

Task 1. Step 4: Community organizations that serve LEP persons.

CAMPO has current and ongoing associations with State and local government, educational institutions, and community organizations that provide services for LEP persons.

Task 1. Step 4A: Identify community organizations.

The following organizations are the most involved in serving LEP (Spanish-speaking) persons locally:

- United Latino Community
- Carson City Health & Human Services
- Carson City School District
- Western Nevada College
- Latin American Chamber of Business
- Nevada Office of Minority Health

Task 1. Step 4B: Contact relevant community organizations.

In January 2018 each of these organizations were contacted with a request for information to help CAMPO improve language services provided. A sample of the survey is provided in Appendix D.

Task 1. Step 4C: Obtain information.

CAMPO received written responses from four of the six community organizations identified in Step 4A. These agencies were extremely pleased to be contacted by CAMPO, and eager to be a resource to assist in ensuring that transit services in Carson City were language accessible to those who speak limited English.

Factor 2: The frequency with which LEP individuals come into contact with your programs, activities, and services

Task 2, Step 1: Review the relevant programs, activities and services you provide.

As identified in Task 1, LEP individuals inquire about use, and are affected by the services that JAC provides on a daily basis. Inter action with LEP individuals commonly takes place during the operational time of JAC's fixed route and ADA complementary paratransit services, including by phone when individuals contact JAC's customer service line, and when using the JAC website to access information.

Task 2, Step 2: Review information obtained from community organizations.

The United Latino Community (ULC) interacts with Spanish-speaking clients several times per day, and it is relatively common for them to be asked about public transportation. The agency suggested JAC staff educate, Western Nevada College (WNC) and Latino grocery staff members on how to use the system and what special programs are available (i.e., free senior bus pass program). Most of its clients live in lower income areas, and all of the specific locations mentioned are within the JAC Service Area. Their clients have expressed the need for service to jobs, shopping, medical, and social service locations. JAC provides adequate coverage to these types of services, and there was nothing specifically mentioned that was not already served by JAC. Aside from their own agency, ULC staff suggested the following strategies for obtaining more input from the Latino population:

- Talk with community organizations that represent them
- Utilize Parent Advocates at schools to disseminate and gather information
- Talk with owners/employees of Latino grocery stores
- Make inquiries with WNC's Adult Education program coordinators about needs or obtaining input

The agency believed the Latino community would most trust churches and friends, word of mouth, or FaceBook to deliver language appropriate messages. They felt the best way to get people talking and spreading a message amongst friends and family was to start the dialogue with ULC staff or other social service agencies that the Spanish-speaking population would trust.

Carson City Health & Human Services reported that it interacts with LEP (Spanish-speaking) persons on a daily basis. The agency did not have strong feelings about where persons who speak limited English generally reside in Carson City, but suggested the “Woodside Drive area” and north end of Carson Street, two areas currently served. The agency believed the best way to obtain input from the LEP population was through brief surveys in their preferred language and through focus groups with interpretive services. In addition to social service agencies, the agency indicated the LEP community would be likely to trust churches in delivering language appropriate messages.

Latin American Chamber of Business has the general objective of representing and guiding the Latino business community in Nevada, to increase opportunities for all Nevada businesses. This organization is a valuable resource in the community for a particular segment of the Spanish speaking population and they conduct regular meetings and events popular amongst this community. No comment was received from this agency in response to email and phone inquiries. However, a response was received from this agency during the most recent Disadvantaged Business Enterprise Program Goal update, and a relationship does exist between the Latin American Chamber of Business and CAMPO. Continuous outreach efforts will be made and any information obtained on this topic will be incorporated into future document updates.

Carson City School District reported that it interacts daily with Spanish-speaking LEP students, who mainly reside in the Empire and Mark Twain Elementary School zones. This statement is consistent with comments from the City’s Health & Human Services Department. When asked about what locations Spanish-speaking persons needed to access, the school district identified all schools as important, noting that those within one mile of the school need access to transportation since no school bus is provided for those families. The school district believes that focus groups with interpretive services and Parent Liaisons (possibly through use of surveys) are a good way to obtain input from the Spanish-speaking community; and that the LEP population would most trust churches and schools for language appropriate messages. In their experience, most Spanish-speaking individuals are suspicious of government agencies, especially in today’s climate of a stronger focus on the enforcement of immigration laws. Most of the inquiries made by Spanish-speaking people about accessing public transportation had to do with transportation for Pre-K students (there is now transportation provided through the schools for this) or for those within the one mile school bus zone. Some attempted to use JAC for these purposes but found it difficult to make work due to varying schedules between the schools as compared to JAC.

The mission of the **Nevada Office on Minority Health** is to improve the quality of health care services for members of minority groups, to increase access to health care services for minority groups, to disseminate information, and to educate the public on matters of health care to minority groups. While the office is not as familiar with local issues in this regard, they are a good resource for the state's minority populations, and they do interact with individuals whose proficiency in English is limited several times per day. They were not aware of specific locations within Carson City that LEP persons reside or need access to, but they did state their office has received phone calls from constituents who have problems with obtaining transportation between Carson City and Reno for medical-related appointments.

It was noted, "LEP populations need access to facilities such as schools, state/local government offices, hospitals, public utilities, health and human services/non-profits, DMV, courts/legal services, housing services, and parks." The office felt the best way to obtain input from the LEP population is through community organizations that represent them, parent/teacher meetings, and media outlets sharing information in their primary language. They noted media outlets, schools attended by their children, social service agencies, and churches would be most trusted in delivering language appropriate messages. Finally, the office noted the need for public transportation services and how to access them is a statewide issue. In particular, LEP populations need to know about new routes, fare changes, discounted fares, and services for disabled individuals (specifically how to apply for and maintain these services).

Western Nevada College operates English as a Second Language (ESL) programs. They did not respond to email, phone, or in-person inquiries, however, they do provide an important service to the LEP community and were responsive during a previous update to this plan. Outreach efforts to appropriate WNC staff will continue to be made and any information obtained will be incorporated into future document updates.

Task 2, Step 3: Consult directly with LEP persons.

CAMPO conducted a survey of users of the JAC service in October/November 2017. Of the 295 survey responses, 11 were returned on a form translated into Spanish. While no language-specific questions were included on the survey, there were no requests for language assistance in the areas provided for open-ended comments. Those who completed a survey in Spanish were very complimentary of the transit service and indicated a desire for expanded service hours and area.

In future surveys, CAMPO will include questions to ask LEP persons if they are aware of the types of language assistance currently provided, which forms are most helpful, and if additional language assistance measures would be beneficial.

Factor 3: The importance to LEP persons of your program, activities and services

Task 3, Step 1: Identify your agency's most critical services.

Using public transportation is important to LEP persons as indicated from interactions with community organizations that represent them and the November 2017 survey results. The most critical services for LEP persons are the JAC fixed route service and the JAC Assist ADA complementary paratransit service. These services provide a high quality of life and mobility for LEP persons that may not have access to a vehicle.

If limited English is a barrier to using these services then the consequences for the individual can be significant, including the potential for limited access to health care, education, and employment. These barriers will further inhibit an LEP person's ability to be informed about or participate in the following:

- Route and schedule information
- Fare and payment information
- Fare media distribution system
- System rules, including information about how to ride
- Safety and security information
- Public service announcements
- Complaint and commendation procedures
- Communication related to transit planning

Task 3, Step 2: Review input from community organizations and LEP persons.

Of the total LEP population in Carson City, the Spanish-speaking community represents the most significant number and is the group with which JAC comes into contact on a daily basis. This is made evident by the responses received from bus drivers, community organizations, and the 2017 rider survey. According to all sources, no significant barriers exist that prevent the Spanish-speaking community from obtaining information about or using the services of the JAC transit system. However, JAC will continue to invest and conduct outreach to inform and understand the needs of LEP persons.

Factor 4: The resources available to the recipient and costs

Task 4, Step 1: Inventory language assistance measures currently being provided, along with associated costs.

Below is a list of language assistance measures, which are estimated to have a \$1,000 annual cost:

- JAC fixed route brochures with Spanish translation
- Critical information on JAC website translated into Spanish, with Google Translate feature provided throughout website
- Safety reminders and “how to ride” tips in bus translated into Spanish
- Application for Senior Bus Pass Program translated into Spanish
- Phone number to bilingual staff person at Health and Human Services for Spanish-speaking persons to obtain basic transit information

Task 4, Step 2: Determine what, if any, additional services are needed to provide meaningful access.

Based on the four factor analysis, JAC should continue to focus on providing information regarding the Jump Around Carson bus services in Spanish and when possible, translate more additional information into Spanish. Since no Title VI complaints have been filed, no significant barriers for the Spanish-speaking community were identified in the rider survey, and based on comments from local organizations; no additional services are urgently needed.

However, based on comments from the local organizations, efforts to translate more material for LEP persons should be an on-going process. As a result, efforts will be made to translate the following information into Spanish:

- Printed transit planning information
- Additional website information
- Safety and security related announcements, online and through JAC’s current mobile phone application
- JAC Assist paratransit information
- Transit material in shelters and vehicles
- Information regarding future use of new technology, such as real-time departure information, next-stop announcements, and electronic signage
- On-demand translation services by telephone should be implemented to assist LEP persons when calling the operations office.

Task 4, Step 3: Analyze your budget.

JAC's budget is limited as are staffing resources. However, printed material continues to be an affordable and effective option to provide translated material to the LEP community. Additionally, staff continues to take advantage of existing staff that speak and write Spanish.

Task 4, Step 4: Consider cost effective practices for providing language services.

CAMPO and JAC should collaborate with the community organizations identified in Task 1 to provide cost effective practices. Such partnerships could provide:

- Translation of printed and online information
- Distribution channels for printed information and surveys
- Delivery of language appropriate messages from a trusted source
- Translation assistance for LEP persons
- Educational and outreach opportunities to help improve access for LEP persons
- Spanish language instruction or classes

In addition, CAMPO should research and pursue language assistance products and translation services developed and paid for by local, regional or state government agencies.

Plan for Implementation

I. Identifying LEP individuals who need language assistance

Of the total number of households, 1,092 (4.7 percent) are persons with limited English proficiency. The largest non-English group is Spanish, which represents 80 percent of the LEP population. Research among bus operators and customer service staff indicates the frequency of contact with LEP persons speaking Spanish is daily or almost daily.

II. Language assistance measures

CAMPO and JAC always seek to expand language resources when possible. It is common to have employees with the ability to translate. Therefore, the first measure for language assistance is to use in-house resources. In addition to in-house resources, below are two organizations used to provide Spanish language assistance for both written and speaking services if assistance is not available in-house at the time of need:

- Health & Human Services
Irma Arellano, Office Specialist
900 E. Long St., Carson City, NV 89706
(775) 887-2190 / iarellano@carson.org
- United Latino Community
Yaraseth Anaya-Lugo
1711 N. Roop St., Carson City, NV 89706
(775) 885-1055 / Yaralugov@hotmail.com

Language assistance measures by medium and approach:

- Voice communication (over the phone or in person at the JAC Operations Office):
 - Utilize in-house resources if available
 - Contact one of the organizations noted above
 - If neither agency is available or in the case of languages other than Spanish, staff should use an identified governmental resource from Task 4, or enlist the services of a Language Line or a similar system
- Written communication to the JAC Operations Office:
 - When written communication from an LEP person is received it shall be forwarded to CAMPO staff, who will in turn forward it to an available in-house resource or one of the organizations noted above for assistance with the translation

- Assistance to a LEP person on a bus:
 - The bus operator will ask another passenger to interpret or the driver could provide the phone number for customer service (775-841-7433) for interpretation assistance.
 - The bus operator can also direct the passenger to translated information, such as printed brochures

It is important for CAMPO and JAC to ensure the competency of interpreters and translation services. CAMPO and JAC will continue to review competency as part of its triennial Title VI Program by undertaking these steps:

- Ask the interpreter or translator to demonstrate they can communicate or translate information accurately in English and the other language
- Train the interpreter or translator in specialized terms and concepts associated with JAC's policies and procedures
- Instruct the interpreter or translator that they shall not deviate into a role as counselor, legal advisor, or any other role aside from interpreting or translation
- Ask the interpreter or translator to attest that they do not have a conflict of interest on the issues for which interpretation services are provided

The competency of translation providers is continually assured. An in-house translator is currently available and has demonstrated the ability to provide accurate translation and is familiar with specialized terms and concepts associated with public transportation. The in-house translator understands that translation functions are limited to interpretation and translation only, and that an interpreter/translator shall not deviate into other roles. The in-house translator has attested that there is no conflict of interest.

III. Training staff

JAC operations staff interacts with LEP persons on a regular basis. This includes bus operators, dispatchers, street supervisors, customer service personnel, receptionists, and management. Training to serve LEP persons is implemented by the following means:

- New hire orientation and initial LEP training for new bus operators, as well as, ongoing LEP training is provided at least once per year
- CAMPO and JAC staff will continue to explore the following resources to improve training - videos, handouts, and presentations

IV. Providing notice to LEP persons

CAMPO incorporates a variety of methods to communicate with transit users and the public. These include printed schedule information, signs inside of vehicles and on passenger shelters, website, customer service phone line, mobile app, news releases, advertising, community meetings, and participation in local events. These methods are used to notify LEP persons of the availability of language assistance and the availability of other translated documents.

V. Monitoring and Updating the Language Assistance Plan

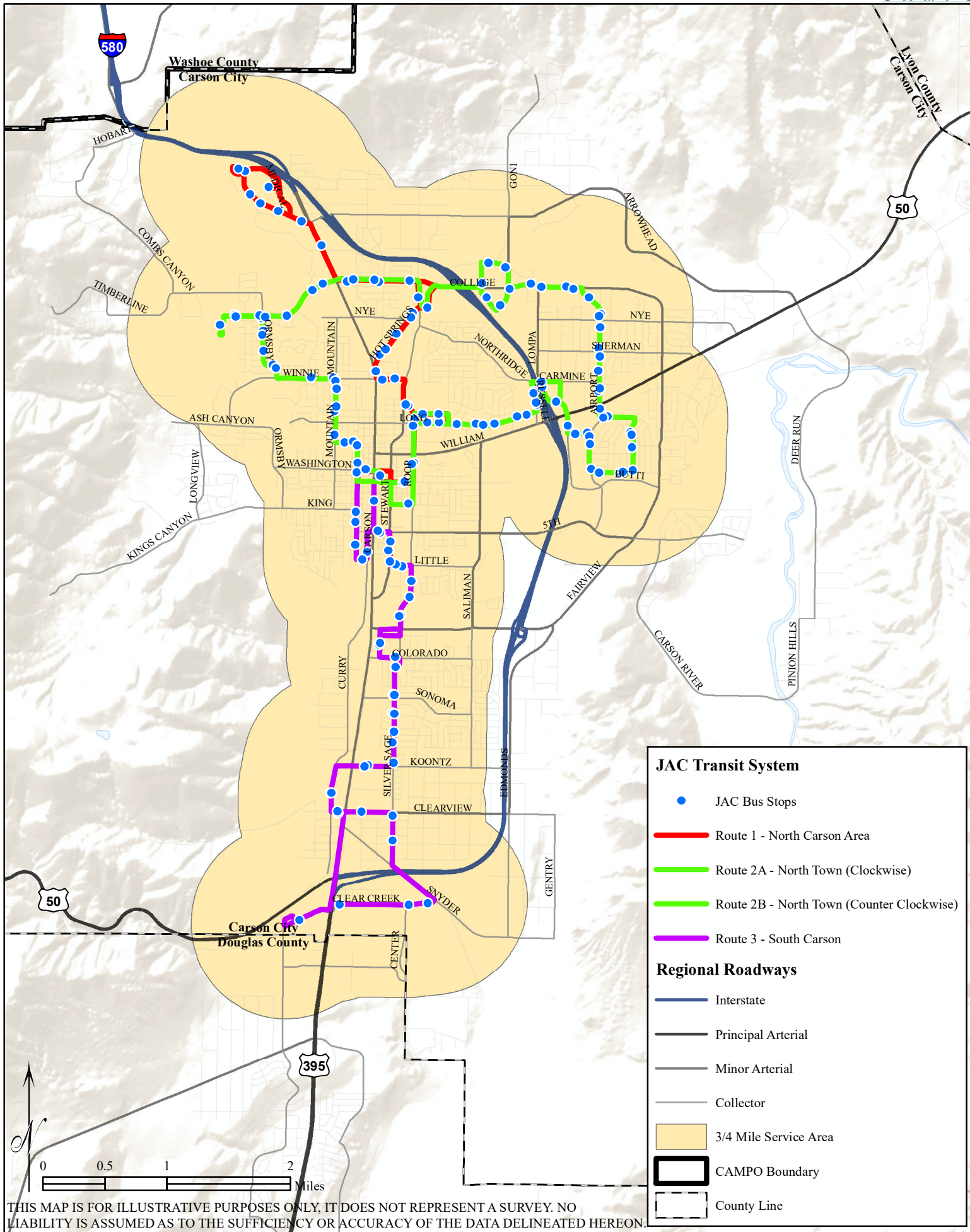
Ongoing outreach efforts will include a process to obtain feedback on JAC's language assistance measures. Specific tasks include contact with the two organizations mentioned above to measure results and discuss the needs of LEP persons. These efforts will reveal any changes to the implementation plan that may be necessary, including any noticeable changes in demographics of the LEP population or the availability of new resources.

The DOT guidance recommends internal monitoring by performing ride checks, in which LEP persons are engaged to ride and report on the experience. It should be noted that this activity is designed to collect information on LEP implementation, not to monitor the performance of any specific employees resulting in corrective or disciplinary action.

If service is expanded into areas with high concentrations of LEP persons, specialized outreach efforts based on measures from this plan will be needed to ensure LEP persons are notified and informed about the service expansion.

Appendix A – JAC Service Area

Appendix A - JAC Service Area

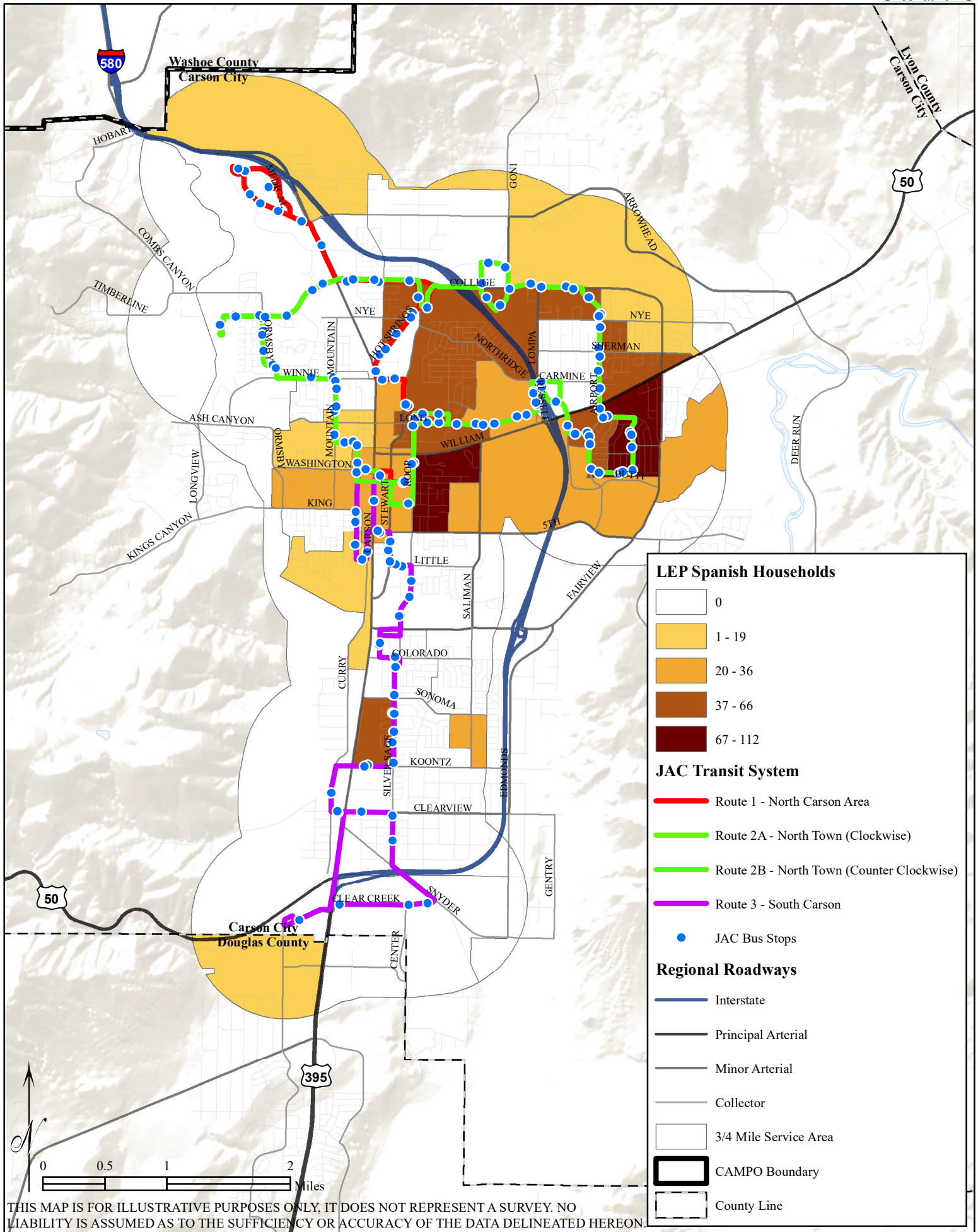


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Appendix B – Languages Other Than English by Census Tract Block Group

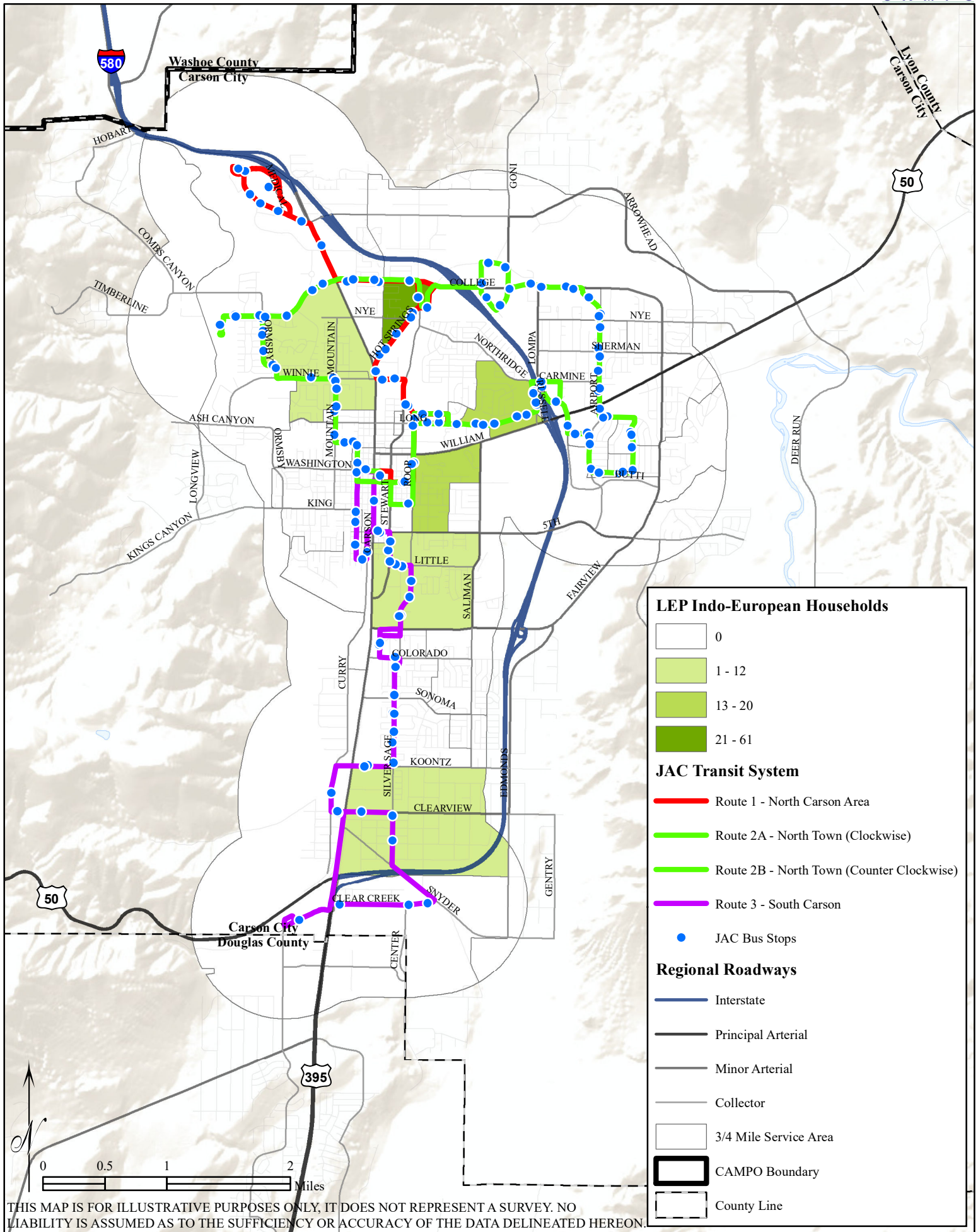
- **B-1 Spanish Limited English Proficiency**
- **B-2 Indo-European Limited English Proficiency**
- **B-3 Asian and Pacific Islander Limited English Proficiency**
- **B-4 Other Limited English Proficiency**

Appendix B-1 - Spanish Households with Limited English Proficiency (LEP)

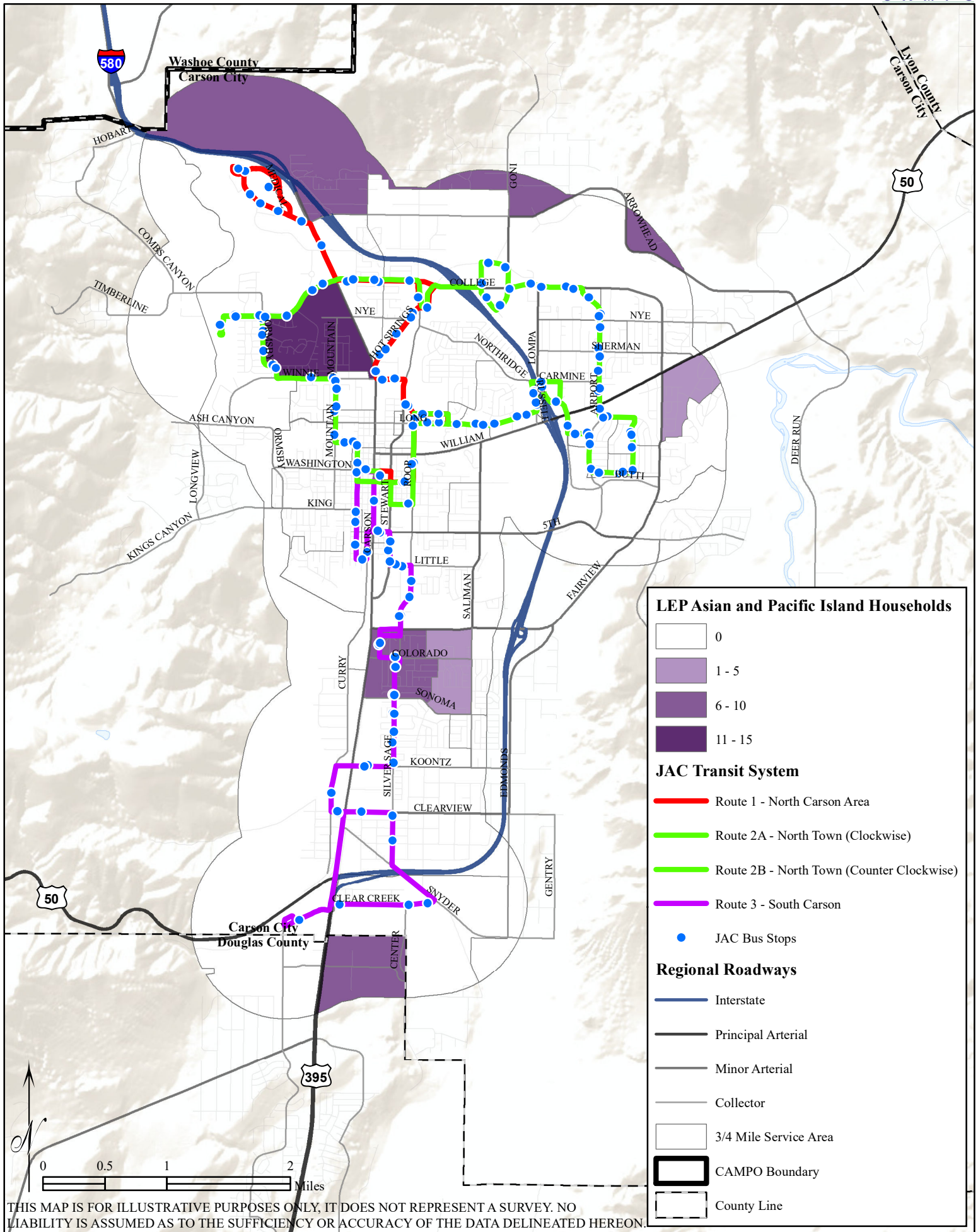


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Appendix B-2 - Indo-European Households with Limited English Proficiency (LEP)

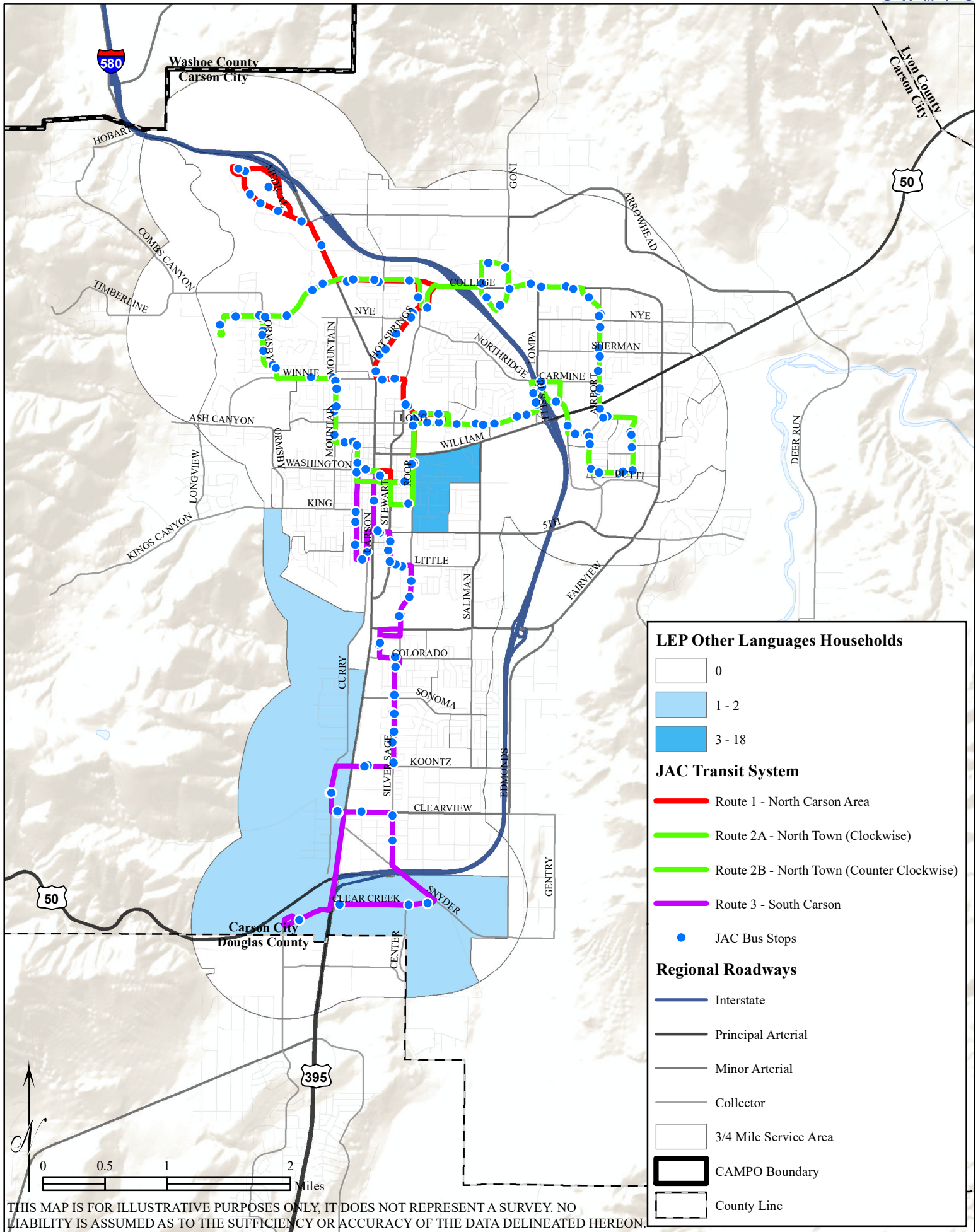


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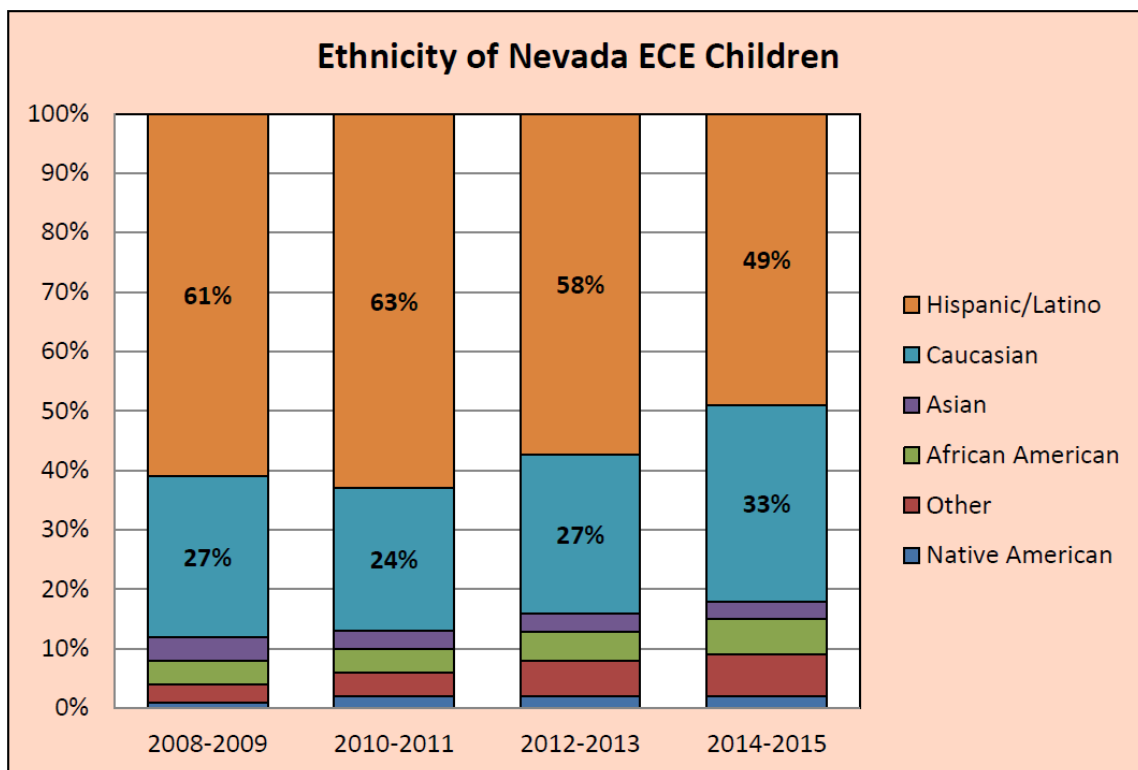
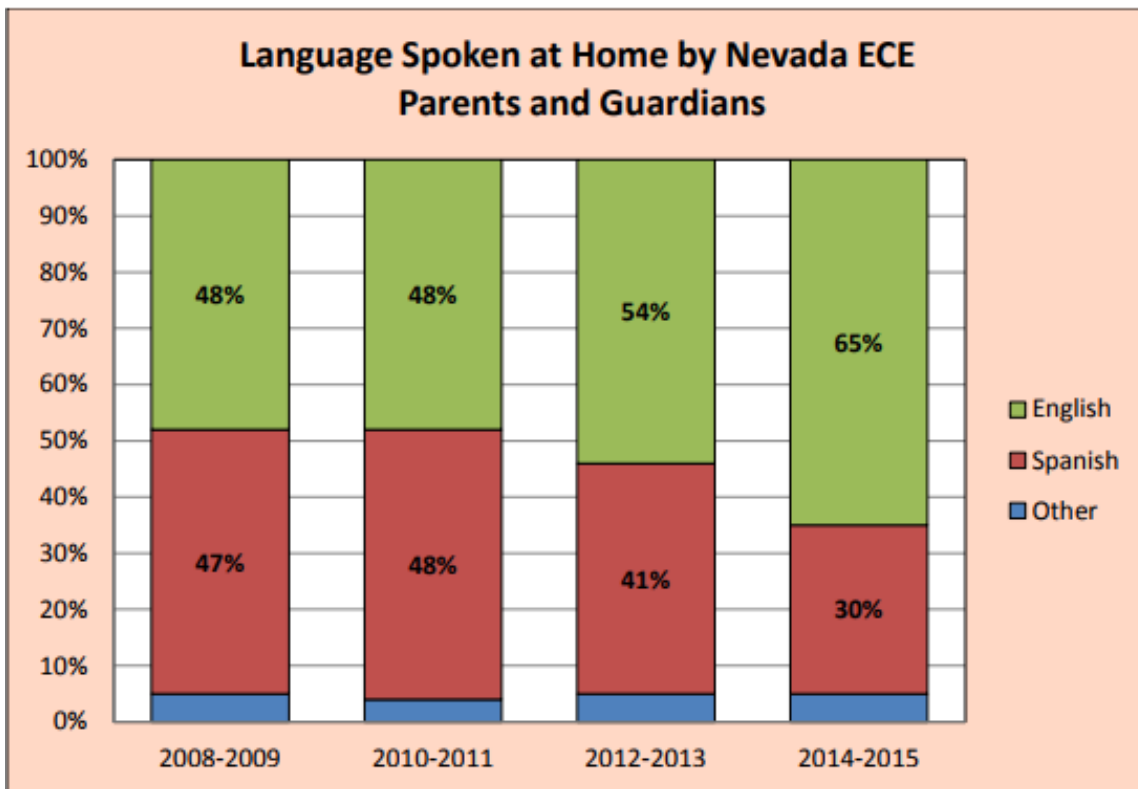
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Appendix B-4 - Other Languages with Limited English Proficiency (LEP)



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Appendix C – 2017 Nevada Education Data Handbook LEP Students in Carson City School District



Appendix D – Survey Provided to Community Organizations



LIMITED ENGLISH PROFICIENT (LEP) POPULATIONS: SURVEY OF COMMUNITY ORGANIZATIONS IN CARSON CITY

CAMPO is conducting a survey of community organizations that may provide services for Limited English Proficient (LEP) persons in Carson City. This information will be useful in the development of a language assistance plan for the Jump Around Carson (JAC) transit system. Specifically, we are working to ensure that our transit services are language accessible by those who speak limited English.

- 1. How often do you interact with an individual whose proficiency in English is limited?
 - a. Several times per day
 - b. Daily
 - c. About once per week
 - d. About once per month
 - e. Almost never

- 2. In your experience, is there a particular area of Carson City where significant numbers of LEP populations reside?
 Yes No
If yes, where? _____

- 3. In your experience, are there particular locations in Carson City that LEP populations need to access?
 Yes No
If yes, where? _____

- 4. What is the best way to obtain input from the LEP population?
 - Brief surveys in their preferred language
 - Focus groups with interpretive services
 - Community organizations that represent them
 - Other (describe) _____

- 5. Who would the LEP population trust most in delivering language appropriate messages?
 - Social service agency
 - Church
 - Local business
 - Other (describe) _____

- 6. Has the LEP population inquired about how to access public transportation or expressed a need for public transportation service? Please explain.

Attachment E
System-wide Service Standards
&
System-wide Service Policies



Jump Around Carson (JAC)

System-Wide Service Standards

&

System-Wide Service Policies



Purpose and Scope

Pursuant to requirements set forth in Federal Transit Administration regulations, fixed route public transit providers that receive Federal financial assistance must establish system-wide standards and policies for each specific fixed route mode of service it provides. These standards and policies must address how service is distributed across the transit system, and must ensure that the manner of the distribution affords users access to these assets.

The system-wide service standards are to be quantitative in nature, set by Jump Around Carson (JAC), and apply agency-wide rather than industry-wide. Providers of fixed route public transportation shall also adopt system-wide service policies to ensure service design and operations practices do not result in discrimination on the basis of race, color, or national origin. Service policies differ from service standards in that they are not necessarily based on a quantitative threshold.

These standards and policies apply to all JAC transit service and passenger facilities. The execution of these standards and policies is performed by JAC. Ongoing oversight and support of the following Title VI standards and policies is performed by CAMPO staff.

JAC System-Wide Service Standards

Service Indicator Adoption and Monitoring

In accordance with FTA Title VI requirements, the Carson Area Metropolitan Planning Organization (CAMPO) shall regularly monitor the performance of its fixed route system relative to system-wide service standards and policies for the indicators discussed below. This is done to ensure routes serving primarily minority and non-minority areas are operated in a fair and equitable manner. Any significant service deficiencies identified through this process must be evaluated further to determine the extent to which minorities are affected. If the negative effect on minority persons is disproportionately higher than the effect on non-minority, additional steps may be necessary to address the discrepancy.

System-Wide Service Standards

The FTA requires all fixed route transit providers of public transportation to develop quantitative standards for the following indicators:

1. Vehicle Load
2. Vehicle Headway
3. On-time Performance
4. Service Availability

The service standards developed by CAMPO for the indicators listed above and contained herein are used to develop and maintain efficient and effective fixed route transit service.

1. Vehicle Load

Vehicle load factor is described by the FTA, in Circular 4702.1B, 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.

Vehicle Load is calculated by dividing the average peak passenger load on each route by the number of seats on the type of bus typically assigned to that route. Vehicle load will be monitored to ensure customer comfort and to determine whether additional capacity should be added to specific trips or routes based on changing demand patterns. All fixed routes utilize buses with a capacity of 32 seated passengers. However, there are two distinct vehicle types in the fleet. A vehicle load factor for each type has been established for buses with either a front engine or rear engine. Vehicle load factor for the front engine buses has been set at 1.47, which means these buses would reach capacity once all 32 seats had been filled and there are 15 standees. Vehicle load factor for the rear engine buses has been set at 1.63, which means these buses would reach capacity once all 32 seats had been filled and there are 20 standees. The variance in standees is due to the differences in vehicle gross vehicle weight rating (GVWR).

2. Vehicle Headway

Vehicle headway is described by the FTA, in Circular 4702.1B, 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). 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.

The JAC fixed routes operate on one hour headways. Each route leaves the transfer plaza in downtown Carson City at half past the hour and returns approximately 54 minutes later. The routes repeat every hour and typically only one bus travels along each route per hour. There are sections of roadways or particular bus stops that are serviced by multiple bus routes. The current service levels of the JAC system are sufficient to meet demand during peak and off-peak hours.

3. On-Time Performance

On-time performance is described by the FTA, in Circular 4702.1B, as follows:

On-time performance is a measure of runs completed as scheduled. This criterion must first 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.

JAC buses are determined to be on-time if it departs a scheduled “time point” between zero or five minutes later than the published time. Buses are considered early if they depart from a published time point prior to the scheduled departure. It is JAC’s goal to be on-time at least 85 percent of the time. While JAC will continue to strive toward a 100 percent on-time rate, a more realistic goal has been established given the operating conditions and past experience. JAC supervisory staff regularly monitors on-time performance and counsels operators who consistently fail to meet on-time performance standards that are within their control. Discussions with bus operators are used to identify vehicle scheduling issues which may be corrected through service changes. Recent non-attainment of this goal has resulted in changes to bus routes, which has led to on-time rates consistently exceeding 95 percent.

4. Service Availability

Service availability is described by the FTA, in Circular 4702.1B, as follows:

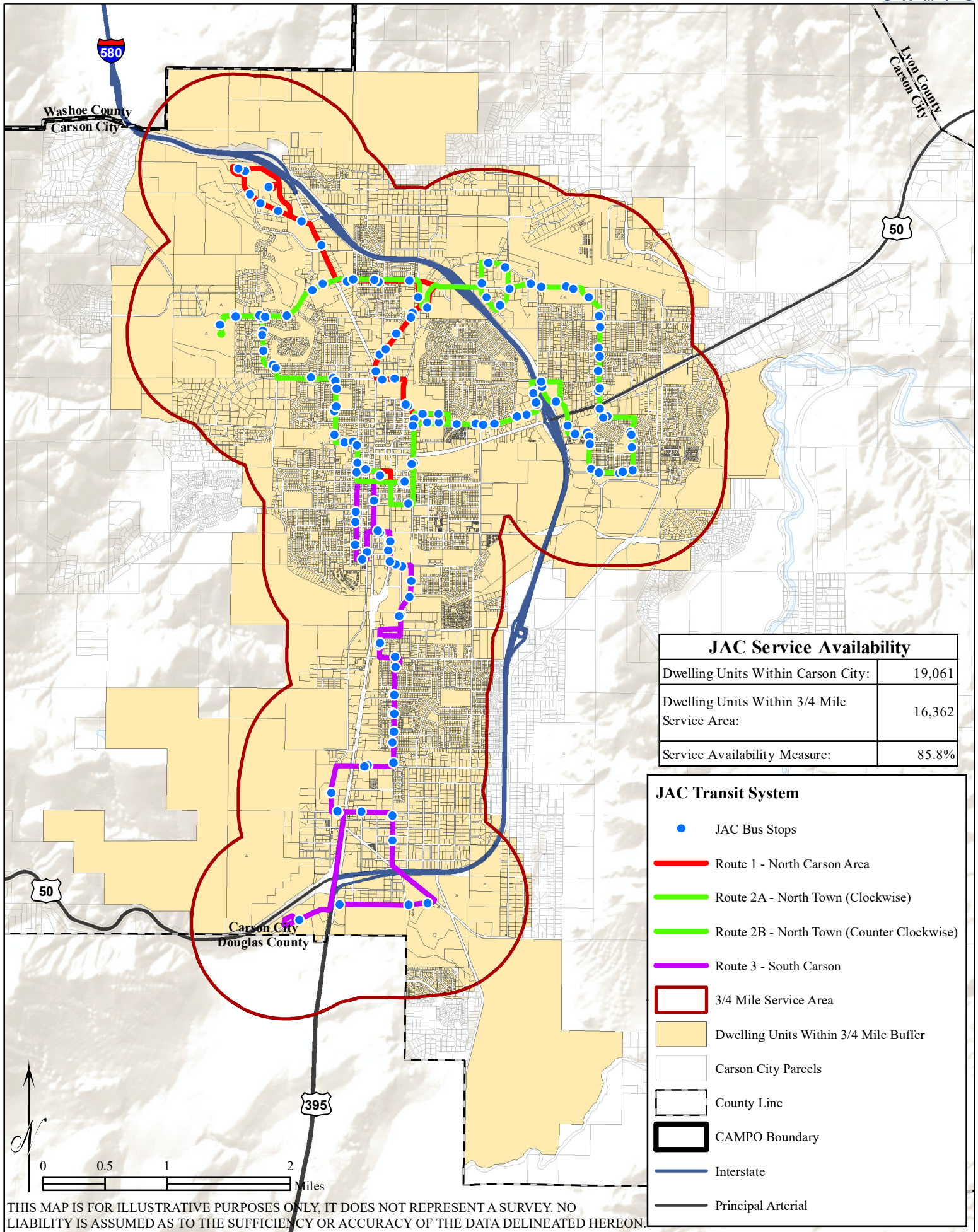
Service Availability is a general measure of the distribution of routes within a transit provider's service area. For example, a transit provider might set a service standard to distribute routes such that a specified percentage of all residents in the service area are within a one-quarter mile walk 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.

The goal for JAC's fixed route services is to provide bus service within three-quarter mile of 75 percent of the dwelling units within Carson City. This represents an increase from the original goal of 60 percent. The presence of JAC transit service is particularly strong in more densely populated low-income and minority parts of the Service Area.

Service Availability is determined by mapping a three-quarter mile buffer around all four of JAC's fixed routes and using assessor parcel information to determine the total number of dwelling units within or that touch the three-quarter mile buffer boundary. The Service Availability measure compares the total number of dwelling units City wide and the total number of dwelling units within the Service Area boundary. The total number of dwelling units City wide is divided by the total number of dwelling units within the three-quarter mile Service Area.

This Service Availability measure demonstrates that 85.8% of the dwelling units within Carson City are located within the three-quarter mile buffer. Figure 1 provides a graphical representation of the Service Availability measure for JAC.

Figure 1 - Jump Around Carson (JAC) Transit System 2020 Service Availability Measure



JAC Service Availability	
Dwelling Units Within Carson City:	19,061
Dwelling Units Within 3/4 Mile Service Area:	16,362
Service Availability Measure:	85.8%

- JAC Transit System**
- JAC Bus Stops
 - Route 1 - North Carson Area
 - Route 2A - North Town (Clockwise)
 - Route 2B - North Town (Counter Clockwise)
 - Route 3 - South Carson
 - 3/4 Mile Service Area
 - Dwelling Units Within 3/4 Mile Buffer
 - Carson City Parcels
 - County Line
 - CAMPO Boundary
 - Interstate
 - Principal Arterial



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JAC System-Wide Service Policies

The FTA requires fixed route transit providers to develop system-wide policies for given service indicators. Transit providers may also opt to set policies for additional indicators as appropriate. The following system-wide policies differ from service standards in that they are not necessarily based on meeting a quantitative threshold, but rather qualitative evaluation results:

1. Distribution of Transit Amenities
2. Vehicle Assignment

The service standards developed by CAMPO for the indicators listed above and contained herein are used to develop and maintain an equitable and effective fixed route transit system.

1. Distribution of Transit Amenities

Distribution of transit amenities is described by the FTA, in Circular 4702.1B, as follows:

Transit amenities refer to items of comfort, convenience, and safety that are available to the general 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.

Transit amenities are distributed along JAC fixed routes on a system-wide basis. Transit amenities include benches, shelters, waste receptacles, and solar lighting. The location of transit amenities is determined based on greatest need, factors of which include ridership, public input/requests, and staff recommendations. Printed information (route map/fares/schedules) is provided at the JAC Operations building as well as on all JAC buses and at all ticket outlets.

2. Vehicle Assignment

Vehicle assignment is described by the FTA, in Circular 4702.1B, 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.

There are two types of fixed route buses in the JAC system, and each type varies in model year. All buses have a capacity of 32 passengers, are ADA compliant (with wheelchair ramp and securement area), and are equipped with two-way radio communications, air conditioning, bike racks, and video surveillance. Any fixed route bus in the fleet may be dispatched to any route in the system on any given day.