

***Federal Transit Administration  
Title VI Program***

**Southern Teton Area Rapid Transit  
(START)**

**Plan Approved April 24, 2025**

(Plan expires 3 years from date approved by the board)



# Title VI Plan Table of Contents

The START Title VI plan includes the following elements:

## Table of Contents

Section 1: Title VI Plan Approval .....	3
Section 2: Title VI Policy Statement .....	4
Section 3: Title VI Notice to the Public .....	5
Section 4: Title VI Complaint Procedure .....	6
Section 5: Title VI Complaint Form .....	8
START Bus: Procedimiento de denuncia del Título VI.....	11
START Bus: Formulario de denuncia en virtud del Título VI .....	13
Section 6: List of Title VI Investigations, Complaints and Lawsuits .....	16
Section 7: Public Participation Plan .....	17
Section 8: Four Factor Analysis and LEP Data.....	22
Section 9: Language Assistance Plan .....	27
Section 10: Minority Representation Information .....	31
Section 11: Providing Assistance to and Monitoring Subrecipients .....	32
Section 12: Title VI Equity Analysis for Facility Acquisition .....	33
Section 13: Fixed Route Transit Providers Service Standards and Policies .....	34

## **Section 1: Title VI Plan Approval**

Title VI Plan Adopted on:

April 24, 2025

Adopted by:

START Board

Signature(s): Lyabutth A. R. C.

Approval:

## **Section 2: Title VI Policy Statement**

### **Policy Statement**

Southern Teton Area Rapid Transit (START), operating as a public transit provider, as a recipient of Federal Transit Administration (FTA) grant dollars either directly from FTA or through the Wyoming Department of Transportation (WYDOT), will comply with the Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), the U.S. Department of Transportation implementing regulations, FTA Circular 4702.1B, and WYDOT Public Transportation requirements as specified in Master Grant Agreement, and State Management Plan. START operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act.

## **Section 3: Title VI Notice to the Public**

### **Title VI Notice to the Public**

#### **START Bus Title VI Policy and Notice**

START Bus operates its program and services without regard to race, color, and national origin in accordance with Title VI of the 1964 Civil Rights Act.

To find out more about our nondiscrimination obligations, to file a complaint, or to request this information in another language, please contact us at:

Town of Jackson  
Attn: Equal Employment Opportunity Officer  
150 East Pearl Avenue, Jackson, WY 83001  
(307) 734-3481 or  
Email: [EEOOfficer@jacksonwy.gov](mailto:EEOOfficer@jacksonwy.gov)

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#### **Aviso y Política del Título VI de START Bus**

*En Español*

START Bus opera sus programas y servicios, sin distinción de raza, color y origen nacional, según el Título VI de la Ley de Derechos Civiles de 1964.

Para obtener más información sobre el programa de derechos civiles del START Bus o para obtener más información sobre los procedimientos para presentar una queja, llame al:

Town of Jackson  
Attn: Equal Employment Opportunity Officer  
150 East Pearl Avenue, Jackson, WY 83001  
(307) 734-3481 or  
Email: [EEOOfficer@jacksonwy.gov](mailto:EEOOfficer@jacksonwy.gov)

The **START** Notice to the Public is posted in the following locations:

1. START Buses (shown above)
2. START administrative offices

## **Section 4: Title VI Complaint Procedure**

Any individual, group of individuals or entity that believes they have been discriminated against on the basis of race, color, or national origin by START may file a Title VI complaint by completing and submitting the agency's Title VI Complaint Form.

If the complainant is unable to reduce the complaint to writing, please contact the Title VI Coordinator using the information below, and a staff member will help dictate the complaint or provide other necessary assistance.

Any individual having filed a complaint or participated in the investigation of a complaint shall not be subjected to any form of intimidation or retaliation. Individuals who have cause to think that they have been subjected to intimidation or retaliation can file a complaint of retaliation following the same procedure for filing a discrimination complaint.

A complaint must be filed with START no later than 180 days after the following:

1. The date of the alleged act of discrimination; or
2. The date when the person(s) became aware of the alleged discrimination; or
3. Where there has been a continuing course of conduct, the date on which that conduct was discontinued of the latest instance of the conduct.

Once the complaint is received, START will review it to determine if our office has jurisdiction. A copy of each Title VI complaint received will be forwarded to the agency's Title VI Coordinator. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by our office.

START has **45** days to investigate the complaint. If more information is needed to resolve the case, START may contact the complainant requesting further information. The complainant has **15** business days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within **15** business days, START can administratively close the case.

After the investigator reviews the complaint, the agency will issue one of two (2) letters to the complainant: a closure letter or a letter of finding (LOF).

- ✓ A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed.
- ✓ A letter of finding (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 it must direct the appeal back to the agency. The complainant has **30** days after receipt of the closure letter or the letter of finding to do so. The appeal will be investigated and decided by a separate party than the Title VI

Coordinator (or other official who issued the initial decision). The appeal process information will be included in the letter.

Written Title VI Complaints, or any questions regarding Title VI protections, should be forwarded to:

**Roxanne DeVries Robinson, Equal Employment Opportunity Officer**  
**307-734-3481, (TTY 7-1-1)**  
Email: [EEOOfficer@jacksonwy.gov](mailto:EEOOfficer@jacksonwy.gov)  
Or visit our administrative office at  
**150 E Pearl Ave, PO Box 1687, Jackson, WY 83001**

A person may also file a complaint directly with WYDOT's Office of Civil Rights at: Title VI Coordinator, 5300 Bishop Blvd., Cheyenne, WY 8200; via phone: 307-777-4457; or email: [DOT-civilrights@wyo.gov](mailto:DOT-civilrights@wyo.gov)

Or

Federal Transit Administration, Office of Civil Rights, Director  
East Building, 5<sup>th</sup> Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.

If information is needed in another language, contact **307-733-3932**.  
Si se necesita información en otro idioma, comuníquese con 307-733-3932.

## **Section 5: Title VI Complaint Form**

### **START**

### **Title VI Complaint Form**

<b>Section I:</b>			
Name:			
Address:			
Telephone (Home):		Telephone (Work):	
E-Mail Address:			
Accessible Format Requirements?	Large Print	Audio Tape	
	TDD	Other	
<b>Section II:</b>			
Are you filing this complaint on your own behalf?		Yes*	No
*If you answered "yes" to this question, go to Section III.			
If not, please supply the name and relationship of the person for whom you are complaining:			
Please explain why you have filed for a third party:			
Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.		Yes	No
<b>Section III:</b>			

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

**Title VI: [ ] Race      [ ] Color      [ ] National Origin**

**Other (specify):** \_\_\_\_\_

Date of Alleged Discrimination (Month, Day, Year): \_\_\_\_\_

Explain as clearly as possible what happened and why you believe you were discriminated against. Describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.

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**Section IV**

Have you previously filed a Civil Rights related complaint with this agency?	Yes	No
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**Section V**

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

[ ] Yes      [ ] No

If yes, check all that apply:

[ ] Federal Agency: \_\_\_\_\_

[ ] Federal Court \_\_\_\_\_ [ ] State Agency \_\_\_\_\_

[ ] State Court \_\_\_\_\_ [ ] Local Agency \_\_\_\_\_

If marked Yes in Section V, please provide information about a contact person at the agency/court where the complaint was filed.

Name: \_\_\_\_\_

Title: \_\_\_\_\_

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

Address:
Telephone:
<b>Section VI</b>
Name of agency complaint is against:
Contact person:
Title:
Telephone number:

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

**Signature and date required below**

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**Signature**

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**Date**

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

**START Bus/Town of Jackson  
Roxanne Robinson, Equal Employment Opportunity Officer  
PO Box 1687  
150 East Pearl Ave  
Jackson, WY 83001  
(307)734-3481  
EEOOfficer@jacksonwy.gov**

## **START Bus: Procedimiento de denuncia del Título VI**

Cualquier individuo, grupo de individuos o entidad que cree que han sido discriminados por motivos de raza, color u origen nacional por START puede presentar una queja del Título VI completando y enviando el Formulario de Quejas del Título VI de la agencia.

Si el denunciante no puede reducir la denuncia por escrito, póngase en contacto con el Coordinador del Título VI utilizando la información que figura a continuación, y un miembro del personal le ayudará a dictar la denuncia o le prestará cualquier otro tipo de asistencia necesaria.

Toda persona que haya presentado una denuncia o participado en la investigación de una denuncia no será objeto de ninguna forma de intimidación o represalia. Las personas que tengan motivos para pensar que han sido objeto de intimidación o represalias pueden presentar una denuncia por represalias siguiendo el mismo procedimiento para presentar una denuncia por discriminación.

La denuncia debe presentarse ante el START a más tardar 180 días después de lo siguiente

1. La fecha del presunto acto de discriminación; o
2. La fecha en que la(s) persona(s) tuvo(n) conocimiento de la presunta discriminación.
3. En caso de conducta continuada, la fecha en la que se puso fin a dicha conducta en el último caso.

Una vez recibida la queja START la revisará para determinar si nuestra oficina tiene jurisdicción. Una copia de cada queja del Título VI recibida será remitida al Coordinador del Título VI de la agencia. El denunciante recibirá una carta de acuse de recibo informándole si la queja será investigada por nuestra oficina.

START dispone de **45** días para investigar la denuncia. Si se necesita más información para resolver el caso, START puede ponerse en contacto con el denunciante solicitando más información. El denunciante dispone de **15** días hábiles a partir de la fecha de la carta para enviar la información solicitada al investigador asignado al caso. Si el denunciante no se pone en contacto con el investigador o no recibe la información adicional en el plazo de **15** días hábiles, START puede cerrar administrativamente el caso.

Después de que el investigador revise la denuncia, la agencia enviará una de las dos cartas siguientes al denunciante: una carta de cierre o una carta de conclusiones.

- ✓ En una carta de clausura se resumen las alegaciones y se declara que no se ha infringido el Título VI y que el caso queda cerrado.

- ✓ En una carta de conclusiones (LOF) se resumen las alegaciones y las entrevistas relativas al presunto incidente, y se explica si se adoptará alguna medida disciplinaria, formación adicional del miembro del personal u otra acción.

Si el denunciante desea recurrir la decisión, debe dirigir el recurso a la agencia. El denunciante dispone de **30** días a partir de la recepción de la carta de clausura o de la carta de constatación para hacerlo. La apelación será investigada y decidida por una parte distinta del Coordinador del Título VI (u otro funcionario que haya emitido la decisión inicial). La información sobre el proceso de apelación se incluirá en la carta.

Las quejas por escrito relacionadas con el Título VI, o cualquier pregunta relativa a las protecciones del Título VI, deben remitirse a:

**Roxanne DeVries Robinson, Responsable de Igualdad de Oportunidades en el Empleo  
307-734-3481, (TTY 7-1-1)**

Correo electrónico: [EEOOfficer@jacksonwy.gov](mailto:EEOOfficer@jacksonwy.gov)

O visite nuestra oficina administrativa en

**150 E Pearl Ave, PO Box 1687, Jackson, WY 83001**

Una persona también puede presentar una queja directamente a la Oficina de Derechos Civiles de WYDOT en:

Title VI Coordinator, 5300 Bishop Blvd., Cheyenne, WY 8200; por teléfono 307-777-4457 o por correo electrónico: [DOT-civilrights@wyo.gov](mailto:DOT-civilrights@wyo.gov)

Administración Federal de Tránsito, Oficina de Derechos Civiles, Director East Building, 5<sup>th</sup> Floor-TCR, 1200 New Jersey Ave., SE Washington, DC, 20590.

Si necesita información en otro idioma, póngase en contacto con el **307-733-3932**.

## **START Bus: Formulario de denuncia en virtud del Título VI**

<b>Sección I:</b>				
Nombre:				
Dirección:				
Teléfono (Casa):		Teléfono (Trabajo):		
<b>Dirección de correo electrónico:</b>				
¿Requerimientos de formato accesible?	Letra grande		Cinta de audio	
	TDD		Otros	
<b>Sección II:</b>				
¿Presenta esta denuncia en su propio nombre?		Sí*	No	
*Si ha respondido "sí" a esta pregunta, pase a la sección III.				
En caso contrario, indique el nombre y el parentesco de la persona en cuyo nombre presenta la queja:				
Explique por qué presenta la demanda en nombre de un tercero:				
Confirme que ha obtenido la autorización de la parte perjudicada si presenta la demanda en nombre de un tercero.		Sí	No	

### Sección III:

**Creo que la discriminación que sufrí se basó en (marque todo lo que corresponda): Title VI: [ ] Raza [ ]**  
Color [ ] Origen nacional

**Other (specify):** \_\_\_\_\_

Fecha de la supuesta discriminación (mes, día, año): \_\_\_\_\_

Explique lo más claramente posible lo sucedido y por qué cree que ha sido discriminado. Describa a todas las personas implicadas. Incluya el nombre y los datos de contacto de la persona o personas que le discriminaron (si los conoce), así como los nombres y datos de contacto de los testigos. Si necesita más espacio, utilice el reverso de este formulario.

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### Sección IV

¿Ha presentado anteriormente alguna queja relacionada con los derechos civiles ante este organismo?

Sí

No

### Sección V

¿Ha presentado esta queja ante algún otro organismo federal, estatal o local, o ante algún tribunal federal o estatal?

[ ] Sí [ ] No

En caso afirmativo, marque todo lo que proceda:

[ ] Agencia Federal

[ ] Tribunal federal [ ] Agencia estatal

[ ] Tribunal estatal [ ] Agencia local

Si ha marcado Sí en la sección V, facilite información sobre una persona de contacto en el organismo/tribunal donde se presentó la denuncia.

**Nombre:**

**Título:**

**Agencia:**

**Dirección:**

**Teléfono:**

**Section VI**

Nombre de la agencia contra la que se presenta la queja:

Persona de contacto:

Título:

Número de teléfono:

Puede adjuntar cualquier material escrito u otra información que considere pertinente para su queja.  
Firma y fecha requeridas a continuación

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Firma

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Fecha

Sírvase presentar este formulario en persona en la dirección que figura a continuación, o enviarlo por correo a

START Bus/Town of Jackson  
Roxanne Robinson, Equal Employment Opportunity Officer  
PO Box 1687  
150 East Pearl Ave  
Jackson, WY 83001  
(307)734-3481  
[EEOfficer@jacksonwy.gov](mailto:EEOfficer@jacksonwy.gov)

## **Section 6: List of Title VI Investigations, Complaints and Lawsuits**

**START** maintains a list or log of all Title VI investigations, complaints and lawsuits, pertaining to its transit-related activities.

### **Check One:**

There have been no investigations, complaint and/or lawsuits filed against us since the last plan submission.

There have been investigations, complaints and/or lawsuits filed against us.  
See list below. Attach additional information as needed.

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

## **Section 7: Public Participation Plan**

### ***START's Public Involvement Philosophy***

START welcomes and values public involvement. WYDOT and its recipients believe that well-designed, proactive public involvement improves its planning and policy efforts and ultimately leads to better decisions, better projects, and maximized, long-term public benefits. Creating long-term, sustainable systems requires our agency to embrace outside skills and knowledge, including input from the public. Advantages of enhanced public involvement include:

- Increased public collaboration. Citizen collaboration on projects benefits our agency's processes and outcomes, promoting public participation and respectful, productive dialogue.
- Decisions that better reflect diverse interests. Consulting with all identifiable interests helps START better understand and reflect the full range of community values and livability standards.
- Efficient transportation decision implementation. Early public involvement fosters better decision making and reduces costly project plan revisions and change orders.
- Enhanced agency credibility. Increased public involvement results in more meaningful and better interactions between Department personnel and customers. This interaction aids everyone. The agency better understands public concerns, and customers gain an appreciation of the agency and its responsibilities.
- START proactively involves the public in addressing transportation issues. The agency communicates its mission and goals to the widest audience possible and considers feedback received from transportation stakeholders and the public.

The agency embraces several specific goals:

- Provide for open and continuous communication to incorporate public input into decision-making and inform the public of planning, program functions, project activities, designs, and construction.

- Implement a public involvement strategy to identify and use agency resources to inform the public of our activities and receive public input. The strategy will establish levels (based on the nature and complexity of the activity) for communicating with transportation stakeholders and the public.
- Consult with local governments in identifying transportation needs, coordinating projects, and selecting viable solutions.
- Respond quickly and transparently to concerns expressed about agency activities and educate the public about transportation programs and issues.
- Review and update the public involvement strategy and process as needed, continuously evaluate public outreach activity effectiveness, and use the results to improve the program.
- Ensure minorities and low-income populations have opportunities to participate in the public involvement process.
- Foster internal communication and training to promote public involvement process understanding and implementation.

## **Strategies and Desired Outcomes**

To promote inclusive public participation, START will employ the following strategies, as appropriate:

- ✓ Provide for early, frequent and continuous engagement by the public
- ✓ Select accessible meeting locations and times
- ✓ Employ different meeting sizes and formats
- ✓ Use radio, television or newspaper ads on stations and in publications that serve LEP populations. Outreach to LEP populations may also include audio programming available on podcasts.
- ✓ Expand traditional outreach methods by visiting ethnic stores/markets and restaurants, community centers, libraries, faith-based institutions, local festivals, etc.

In addition to these general strategies, START has also employed these specific strategies or activities:

- Staff attends employee orientation events hosted by large employers

- Staff brings vehicles to community events such as Touch-a-Truck and Trunk-or-Treat
- Staff attends events hosted by the Chamber of Commerce to familiarize J1 and seasonal employees with town services
- Staff attended the Regional Transportation Expo along with other stakeholders to provide information to the public about services and projects in our area
- START routinely distributes communications in both English and Spanish

## Public Outreach Activities

The public outreach and involvement activities conducted by START in the past year are summarized in the table below.

Specific Public Participation activities are listed in the table below:

Event Date	START Staffer(s) or Department	Activity	Communication Method (Public notice, posters, social media)	Notes
Annual, first Saturday in June	Director, Ops Manager, Transit Coordinator, Transit Operator	Touch-a-Truck hosted by Children's Museum	Bus, custom coloring books, Tri-fold About Us, candy	Well attended community event that brings together interesting heavy vehicles
Twice a year (Summer and Winter)	Director, Ops Manager, Coordinator	Chamber of Commerce Seasonal Employee welcome	Information table, system maps, Tri-Fold About Us, verbal communication	Event to introduce seasonal employees to services and amenities available in town.
Annual on Halloween	Transit operator, Transit Coordinator, Supervisor/Dispatcher	Trunk-or-Treat	Bus decorated for Halloween, custom coloring books, Tri-Folds, candy, glow necklaces	Well attended community event
Winter, when invited	Transit Director, Transit Coordinator	Jackson Hole Mountain Resort employee orientation	Information table, Tri-folds, START Bus stress buses, Transit App info,	Large employer event for new employees to introduce

			system maps, verbal communication	them to local services
On going		Title VI & ADA	Policy notices in English and Spanish in all buses and office	
On going, as needed	Transit Director	Local news outlets, both print and radio	Transit director makes himself available to local reporters to explain significant events related to transit service	
On going	All staff	Bus fare media	Digital fare platform is available in English and Spanish. Continue to provide physical passes and tickets for passengers who don't have mobile devices or prefer cash payment	
As needed		Customer Surveys	All surveys are provided in both English and Spanish	
February 2024 and February 2025	Director, Ops Manager, Transit Coordinator	Regional Transportation Expo	Information table, Tri-folds, START Bus stress buses, Transit App info, system maps, verbal communication	Event gathering local government and non-profit organizations with projects effecting regional transportation and land use

Fourth Thursday of the month	Director, Ops Manager, Coordinator, Service Planner START Board members	START Board monthly meeting	An opportunity for Public Comment is included on the agenda. Meetings are open to the public in-person and virtual	
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## **Section 8: Four Factor Analysis and LEP Data**

### **What does it mean to be Limited English Proficient (LEP)?**

LEP individuals do not speak English as their primary language and therefore have a limited ability to read, write, speak, or understand English. Many LEP persons are in the process of learning English and may read, write, speak, and/or understand some English, but not proficiently. LEP status may be context-specific – an individual may have sufficient English language skills to communicate basic information (name, address etc.) but may not have sufficient skills to communicate detailed information in English.

### **Background**

Federal law prohibits discrimination based on national origin. National origin discrimination includes discrimination based on a person's inability to speak, read, write or understand English. Recipients of Federal funds must provide meaningful access to LEP individuals.

On August 11, 2000, Executive Order 13166, titled, "Improving Access to Services by Persons with Limited English Proficiency," was issued. Executive Order 13166 requires Federal agencies to assess and address the needs of otherwise eligible persons seeking access to federally conducted programs and activities who, due to LEP cannot fully and equally participate in or benefit from those programs and activities. Section 2 of the Executive Order 13166 directs each Federal department or agency "to prepare a plan to improve access to...Federally conducted programs and activities by eligible LEP persons...."

### **Framework for Deciding when Language Services are Needed**

START will take the following steps to ensure meaningful access to its programs, services, and activities for LEP individuals in a manner that balances the following four factors.

## FOUR-FACTOR ANALYSIS

The Four Factor Analysis is a local assessment that considers:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by the agency;
2. The frequency with which LEP persons come into contact with the agency's services and programs;
3. The nature and importance of the agency's services and programs in people's lives; and
4. The resources available to the agency for LEP outreach, as well as the costs associated with that outreach.

### **Factor One: The number or proportion of LEP persons eligible to be serviced or likely to be encountered by START**

The first step in determining the appropriate components of a Language Assistance Plan is understanding the proportion of LEP persons who may encounter our agency's services, their literacy skills in English and their native language, the location of their communities and neighborhoods and, more importantly, if any are underserved as a result of a language barrier.

To do this, the agency evaluated the level of English proficiency and to what degree people in its service area speak a language other than English and what those languages are. Data for this review is derived from the United States Census and the American Community Survey. The most recent data available for the state were the ACS 2017-2021 five-year estimates.

#### *Service Area Overview*

START service area encompasses the Town of Jackson, Teton County, WY, and parts of Star Valley, WY and Teton Valley, ID. Teton County encompasses 119 square miles. The Town of Jackson is 3 square miles. Approximately 3% of START's service area is privately held, developable land. The majority of the land is publicly held in the form of National Parks, National Forest, etc. The service area's population of 33,410 speaks 10 different language

groups. However, the overall numbers of residents who speak English 'less than very well' are very low. Of the total service area population of 33,410, 2,098, or 6% of residents, report speaking English less than very well. A breakdown of the language groups, and those speaking English less than very well, are shown below.

	Teton County, Idaho	Teton County, Wyoming		
Label	Estimate	Estimate	Total in Service Area	
Total:	11,026	22,384	33,410	
Speak only English	9,556	18,017	27,573	82.53%
Speak Spanish, and English less than "very well"	506	1,545	2,051	6.14%
Speak Indo-European, and English less than "very well"	0	9	9	0.03%
Speak Chinese, and English less than "very well"	0	10	10	0.03%
Speak Asian and Pacific Island, and English less than "very well"	0	28	28	0.08%

<https://data.census.gov/cedsci/> Table C16001

#### *The Safe Harbor Provision*

The U.S. Department of Transportation (U.S. DOT) has adopted the U.S. Department of Justice's Safe Harbor Provision. This provision outlines circumstances that can provide a "safe harbor" for U.S. DOT recipients (and sub-recipients) regarding translation of vital documents. Specifically, if a recipient provides written translation of vital documents for each LEP group that constitutes the lesser of 1,000 persons or five percent (5%) of the total population eligible to be served or likely to be affected or encountered, such action is considered strong evidence of compliance with the recipient's written translation obligations.

The Safe Harbor Provision only applies to the translation of written documents. It does not affect the agency's requirement to provide meaningful access to LEP individuals through oral language services.

A vital document is any document that is critical for ensuring meaningful access to the recipients' major activities and programs by beneficiaries generally and LEP persons specifically. Whether or not a document (or the information it solicits) is "vital" may depend upon the importance of the program, information, encounter, or service involved, and the consequence to the LEP person if the information in question is not provided accurately or in a timely manner.

The data above shows that just one language meets the Safe Harbor threshold—Spanish. Teton County is home to 2,051 people (6.14% of the population) who speak Spanish, and speak English less than very well. Although there are some residents who speak Indo-European languages, Chinese, or Asian and Pacific Island languages, they make up less than 5% of the population. The number of people who speak other languages and English less than very well all comprise under 0.1% of the population each.

#### *Designation of Vital Documents*

Based on the population of Spanish speakers who also speak English less than very well, START designates the following as Vital Documents which have been translated to LANGUAGE(S): Spanish. Title VI Notice to the Public, Title VI Complaint Form, Title VI Complaint Procedures, ADA Notice to the Public, and Baby Stroller Policy. Additionally, in-bus announcements are in both English and Spanish.

#### **Factor Two: The frequency with which LEP persons come into contact with Agency services and programs.**

Across all staff, START personnel interact with people with Limited English Proficiency four to six times per month. These interactions include: bus drivers assisting passengers with fares; supervisor/dispatchers assisting riders over-the-phone with route information, and in-person ticket or pass sales in our administrative offices.

Three people on staff speak Spanish to help with translation. If they are not available, the Town has a special, internal phone number that will ring all Spanish speaking staff for assistance. Online translation systems (Google Translate) have also been utilized.

### **Factor Three: The Importance of the Agency's Service to People's Lives**

START services likely affect every community member in some way. Our transit services are used daily by people who do not have access to their own transportation. Our services allow riders access to grocery stores, medical appointments, work, social service agencies, social activities, and a variety of other essential destinations. Some LEP persons are immigrants with no driver's license at this time. Others are seasonal workers on J1 Visas who don't have access to their own cars. START service is also very popular with the large number of tourists who visit Jackson Hole.

Finally, START's planning process relies on input from the public. The agency's services are therefore important to LEP person's lives, and must be accessible to everyone, regardless of ability to speak English.

### **Factor Four: Resources and Costs for LEP Outreach**

Given that START has a very limited number of LEP citizens, we can meet the needs of its LEP population through relatively simple means. First, START staff members who speak Spanish or any other foreign languages can be consulted or utilized for translation or interpretation in informal or emergency situations. In the event assistance in a rare language is needed, START can reach out to town staff to find staff who are proficient and may be willing to assist. Other free resources include the use of Google Translate or other technology-based translation services. Our agency can utilize Google Translate to interpret simple comments or messages left on our social media or in real time if necessary to communicate without advance warning when an interpreter is needed.

START recognizes there will be times when professional interpretation or translation services are needed. In those cases where a citizen needs to communicate with us in another language, the Town of Jackson has an internal "hotline" that rings to staff members who are fluent in Spanish, which is our largest LEP population.

Finally, START will pay for document translation services when needed, which generally costs about \$25-\$35 per page. For example, the Spanish translation of vital documents included in this Program were completed by town staff who are fluent in Spanish.

These resources give our agency the ability to perform outreach with the LEP population at a reasonable cost.

## **Section 9: Language Assistance Plan**

As a recipient of federal US DOT funding, START is required to take reasonable steps to ensure meaningful access to our programs and activities by limited-English proficient (LEP) persons.

Limited English Proficient (LEP) refers to persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. This includes those who have reported to the U.S. Census that they speak English less than very well, not well, or not at all.

**START's** Language Assistance Plan includes the following elements:

1. The results of the *Four Factor Analysis*, including a description of the LEP population(s), served.
2. A description of how language assistance services are provided by language
3. A description of how LEP persons are informed of the availability of language assistance service
4. A description of how the language assistance plan is monitored and updated
5. A description of how employees are trained to provide language assistance to LEP persons

### ***Four Factor Analysis Results: LEP Populations Served***

#### **Item #1 – Four Factor Analysis Results: LEP Populations Served**

The data above shows that just one language meets the Safe Harbor threshold—Spanish. Teton County is home to 2,051 people (6.14% of the population) who speak Spanish, and speak English less than very well. Although there are some residents who speak Indo-European languages, Chinese, or Asian and Pacific Island languages, they make up less than 5% of the population. The number of people who speak other languages and English less than very well all comprise under 0.1% of the population each.

#### **Item # 2 – Description of how Language Assistance Services are Provided, by Language**

START has identified, developed, and uses the following:

- a) START designates the following as Vital Documents which have been translated to LANGUAGE(S): Spanish. Title VI Notice to the Public, Title VI Complaint Form, Title VI Complaint Procedures, and ADA Notice to the Public.
- b) In-bus stop announcements are in both English and Spanish.

- c) Individuals who have contact with the public are directed to use Google Translate on a desktop or mobile device to communicate.
- d) START has developed partnerships with local agencies, organizations, law enforcement, and social service agencies that are available to assist with its LEP responsibilities.
- e) Any other need for translated documents or interpretation services will be provided on an as-needed basis. That is, anyone requesting specific information in a non-English language will be provided it upon request. The agency will use its internal resources to meet this need, when available. Otherwise, the agency will reach out to the network of resources it has developed, or hire a translator or interpreter as needed.
- f) The Town of Jackson website, which hosts START information, employs a Google Translate widget to convert to Spanish. There is a prominent link at the top of the page.

<b>Item #3 – Description of how LEP Persons are Informed of the Availability of Language Assistance Service</b>
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In order to ensure that LEP individuals are aware of START's language assistance measures, START provides the following:

- Title VI Program including the Language Assistance Plan is made available on website, hard copy in administrative office, and notices on vehicles.
- Drivers and Dispatchers are directed to use Google Translate on a computer or mobile device to provide assistance.

<b>Item #4 – Description of how the Language Assistance Plan is Monitored and Updated</b>
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START will continue to update the LEP plan as required by U.S. DOT. At a minimum, the Title VI Plan will continue to be reviewed and updated every three (3) years in conjunction with the Title VI submission and use data from the U.S. Decennial Census or the American Community Survey as available, or when it is clear that the concentrations of LEP individuals are present in the START service area.

Updates will continue to include the following:

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

- Determine whether complaints have been received concerning START's failure to meet the needs of LEP individuals

Item #5 – Description of how Employees are Trained to Provide Language Assistance to LEP Persons
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The following training will be provided to START staff:

- Information on the START Title VI Procedures and LEP responsibilities.
- Description of language assistance services offered to the public.
- Use of Google Translate to provide real-time assistance.
- Documentation of language assistance requests.
- Use of town provided, over-the-phone translation.
- How to handle a potential Title VI / LEP complaint.

# Log of LEP Encounters

## **Section 10: Minority Representation Information**

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.

**A.** While START has a Board of Directors, the members are not appointed by the recipient. Board members are appointed jointly by the Town of Jackson and Teton County. This section is not applicable.

## **Section 11: Providing Assistance to and Monitoring Subrecipients**

1. Does agency provide funding to subrecipients?

No, the agency does not have subrecipients.

## **Section 12: Title VI Equity Analysis for Facility Acquisition**

Title 49 CFR, Appendix C, Section (3)(iv) requires “the location of projects requiring land acquisition and the displacement of persons from their residences and business may not be determined on the basis of race, color, or national origin.” For purposes of this requirement, “facilities” does not include bus shelters, as they are considered transit amenities. It also does not include transit stations, power substations, or any other project evaluated by the National Environmental Policy Act (NEPA) process. Facilities included in the provision include, but are not limited to, storage facilities, maintenance facilities, operations centers, etc. Has the agency built a facility? (check a response below)

- No, the agency has not built a facility.
- Yes, the agency has built a facility and completed a Title VI equity analysis to compare the equity impacts of various siting alternatives, and the analysis must occur before the selection of the preferred site. (Include at the end of the Title VI plan a copy of the Title VI equity analysis.)

## **Section 13: Fixed Route Transit Providers Service Standards and Policies**

*FTA Circular 4702.1B, Chapter III, Paragraph 10: All fixed route transit providers shall set service standards and policies for each specific fixed route mode of service they provide.*

START:

- is a fixed route transit provider
- is **not** a fixed route transit provider

*All Fixed Route Transit Providers must submit:*

- All requirements set out in Chapter III (General Requirements)
  - Service standards
    - Vehicle load for each mode
    - Vehicle headway for each mode
    - On time performance for each mode
    - Service availability for each mode
  - Service policies
    - Transit Amenities for each mode
    - Vehicle Assignment for each mode

START has adopted the following system-wide standards and 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.

### **Service Standards**

FTA requires that all fixed route transit providers develop quantitative standards for all fixed route modes of operation for the following indicators. START has prepared standards for all modes it operates including **Insert modes of transportation**.

- a. Vehicle Load

Vehicle Type	Average Passenger Capacities			
	Seated	Standing	Total	Maximum Load Factor
15' Mini-Bus (2)	12	2	30	
30' Low Floor Bus	27	10	37	
40' Low Floor Bus (27)	39	12	51	

45' Motor Coach Bus	55	12	67	
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b. Vehicle Headway

<b>POLICY HEADWAYS AND PERIODS OF OPERATION</b>				
<b><u>WEEKDAY</u></b>	<b><u>Peak</u></b>	<b><u>Base</u></b>	<b><u>Evening</u></b>	<b><u>Night</u></b>
Town Shuttle	15	15	15	15
Teton Local (Winter)	40	40	40	40
Teton Local (Other Seasons)	60	60	60	60
Teton Express (Winter)	20	40	20	40
Village South (Winter Only)	90	90	90	90
Commuter Service	30	--	30	--

*\* Peak: 5:00 - 8:30am and 4:30-7:30 pm; Base 9am - 4pm; Evening: 6-9:30 pm;  
Night: 9:30pm-11:30pm;  
"--" means no service is provided during that time period.*

c. On-Time Performance

A vehicle is considered on time if it departs a scheduled time point no more than five (5) minutes late. The START on-time performance objective is 82% or greater. START continuously monitors on-time performance and system results are published and posted as part of quarterly performance reports covering all aspects of operations.

d. Service Availability

Due to the rural nature of Teton County, START will distribute transit service so that 70% of all residents in the service area are within  $\frac{1}{2}$  mile of bus service. START will provide service within the Town of Jackson so that 90% of all residents are within  $\frac{1}{4}$  mile of transit service.

## Service Policies

FTA requires fixed route transit providers to develop a policy for service indicators. START has prepared the following policies for its transit system.

a. Distribution of Transit Amenities

Installation of transit amenities along bus routes are based on the number of passengers boarding at stops and stations along those routes.

b. Vehicle Assignment

All Spring, Summer, and Fall non-commuter services are provided using 2023 Gillig low-floor buses. These buses are either 30' or 40' in length. 45' 2023 model year MCI buses are dedicated to the commuter routes. Backup vehicles are 15 to 17 year old MCI buses. 30' Low-Floor buses are assigned to in-town shuttle routes operation on narrow streets with tight turning radii. All buses are equipped with automated stop announcement systems that provide information in both Spanish and English.

Bus assignments take into account the operating characteristics of buses of various lengths, which are matched to the operating characteristics of the route. Local routes with lower ridership may be assigned 30-foot buses rather than the 40-foot buses. Some routes requiring tight turns on narrow streets are operated with 30-foot rather than 40-foot buses.

During the winter season, START services are enhanced to provide service to Teton Village and the Jackson Hole Mountain Resort ski area. These services are provided using 40' coaches with higher capacities. These coaches range in age from 2 years to 1 years (2009 through 2023 models).