PARK CITY MUNICIPAL CORPORATION
TRANSPORTATION DEPARTMENT
TITLE VI GENERAL REPORTING REQUIREMENTS

2019
Title VI Program Plan

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A. TITLE VI NOTICE TO THE PUBLIC

Notice to the Public of Rights Under Title VI

Park City Transit (PCT) is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services or programs on the basis of race, color, national origin, or other protected class as afforded by Title VI of the Civil Rights Act of 1964. PCT operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act.

Any person who believes she or he has, individually, or as a member of any specific class of persons, been subjected to discrimination on the basis of race, color, national origin, or other protected class may file a complaint with PCT.

For more information on PCT’s civil rights program, and the procedures to file a complaint, contact our Title VI Program Administrator at 435-615-5371 or by e-mail at vinny.nguyen@parkcity.org; visit our website: www.parkcitytransit.org; or visit our administrative offices at 1053 Iron Horse Drive, Park City, Utah 84060.

A complainant may also file a complaint directly with the Federal Transit Administration, Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave. SE, Washington, DC 20590.
B. Posted Locations of the Title VI Notice

PCT's Title VI notice to the public is posted at the following locations:

- PCT's website: http://www.parkcitytransit.org
- PCT's Administrative Offices, 1053 Iron Horse Drive, Park City, Utah 84060
- PCT's Rider's Guide
- Transit Buses

C. Procedures for Filing a Title VI Complaint

Any person who believes that he or she, individually, or as a member of any specific class of persons, has been subjected to discrimination on the basis of race, color, national origin, or other protected-class interests may file a written complaint with PCT, the Federal Transit Administration (FTA), the U.S. Department of Transportation (USDOT), or the U.S. Department of Justice (USDOJ). Further, PCT prohibits intimidation, coercion, or engagement in other discriminatory conduct against anyone because he or she has filed a complaint to secure their rights as protected by Title VI.

Policy

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

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

To ensure compliance with this requirement, it is the policy of Park City Municipal Corporation to ensure that all federally funded transit services and related benefits are provided without discrimination in a manner consistent with Title VI.

Purpose

The purpose of this procedure is to provide the right of a fair hearing without fear of prejudice to any persons who feel they have been subjected to discrimination on the basis of race, color, or national origin with respect to transportation service or other transit benefit. The goal of the procedures as defined is to provide an avenue for speedy solutions and remedies to problems associated with issues of discrimination in the event they arise. Any individual needing assistance with the Complaint Grievance procedure may ask the Park City Attorney’s Office for such assistance, as necessary.
Definitions

a. Discrimination Appeals Board: The City Manager or his/her designee, an attorney for the City Attorney’s Office, and a Manager other than the Transportation Manager.

b. Complaint: A Complaint shall be defined as a written assertion that any person, individually or as a member of a specific class of persons, has been subject to discrimination on the basis of race, color, or national origin by the Park City Municipal Transit System or its contractors, employees, or agents.

c. Title VI Officer: An employee of Park City designated by the City Manager to process Complaints according to procedure specified in this policy.

d. Transportation Manager: The Transportation Manager within the Park City Transportation and Parking Fund.

Complaint Procedure

1. Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by Park City Transit Department (hereinafter referred to as "the Department") may file a Title VI complaint by completing and submitting the Department's Title VI Complaint Form to the Park City Municipal Corporation City Attorney’s Office. The City Attorney’s Office investigates complaints received no more than thirty (30) days after the alleged incident. The Attorney Office will process complaints that are complete. Any individual needing assistance with writing the complaint may ask the City Attorney’s Office for such assistance.

2. Once the complaint is received, the City Attorney’s Office will review it to determine if Park City has jurisdiction. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by the City. The Complaint shall be forwarded to the Title VI Officer. The Officer shall investigate the Complaint and prepare a written response, including any remedial or enforcement action, within thirty (30) calendar days and forward the response to the Complainant and Transportation Manager. 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.

3. Board Appeal Level
In all cases where the Complainant or Transportation Manager disagrees with a decision of the Title VI Officer, the Complainant or Transportation Manager may appeal the decision of the Title VI Officer to the Discrimination Appeals Board. The appeal shall be taken by filing written notice of the appeal with the City Recorder within ten (10) calendar days after the decision of the Title VI Officer. Upon the filing of the appeal, the Discrimination Appeals Board shall commence its investigation, take and receive evidence, and fully hear and determine the matter. The Complainant and Transportation Manager shall be entitled to appear in person and to be represented by counsel, to have a hearing, to confront the witness whose testimony is to be considered, and to examine the evidence to be considered by the Appeals Board. The Discrimination Appeals Board’s decision shall be made to the Complainant and the Transportation Manager in writing.
State and Federal Appeal Process

In the event the Discrimination Appeals Board upholds the Title VI Officer’s decision, the Complainant or Transportation Manager may file the Complaint with the Utah Department of Transportation, the Federal Department of Transportation, or the Federal Transit Administration as follows:

Selection and Evaluation Committee
Utah Department of Transportation
Attn. Title VI Coordinator
4501 South 2700 West, P.O. Box 141265
Salt Lake City, Utah 84114-1265

FTA Office of Civil Rights
1200 New Jersey Avenue SE
Washington, DC 20590

The Complainant or Transportation Director should contact the relevant agency to determine the applicable requirements and the deadlines for filing a Complaint with that agency. UDOT, DOT, and FTA Complaints must generally be filed within one hundred eighty (180) calendar days of the alleged discrimination.

Effective Date November 15, 2019

Alfred Knotts, Transportation Manager

Approved as to Form:

Mark Harrington, City Attorney
D. TITLE VI COMPLAINT FORM

The complainant will use the following complaint form:

Title VI Complaint Form

Title VI of the 1964 Civil Rights Act requires that "No person in the United States shall, on the ground of race, color, national origin, or other protected class be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance."

The following information is necessary to assist us in processing your complaint. Should you require any assistance in completing this form, please let us know.

Complete and return this form to Park City Transit P.O. Box 1480, Park City, Utah 84060 or 1053 Iron Horse Drive, Park City, Utah 84060.

1. Complainant's Name: ________________________________

2. Mailing Address: ________________________________

3. City/State/Zip Code: ________________________________

4. Telephone: ________________________________

5. Person discriminated against (if other than complainant):

Name: ________________________________

Address: ________________________________

City/State/Zip Code: ________________________________

6. Which of the following best describes the reason you believe the discrimination took place? Was it because of:

a. Race: □

b. Color: □

c. National Origin: □

d. Other □
7. What date did the alleged discrimination take place? ____________________________

8. In your own words, describe the alleged discrimination. Explain what happened and whom you believe to be responsible. Please use additional sheets of paper if necessary.

__________________________________________________________________________

__________________________________________________________________________

__________________________________________________________________________

__________________________________________________________________________

__________________________________________________________________________

9. List any others who may have knowledge of this event:

<table>
<thead>
<tr>
<th>Name</th>
<th>Address</th>
<th>City/State/Zip Code</th>
</tr>
</thead>
</table>

10. 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 each box that applies:

Federal Agency ☐ Federal Court ☐ State Agency ☐ State Court ☐ Local Agency ☐

11. Please provide a contact name at the agency/court where the complaint was filed:

__________________________________________________________________________

Please sign below:

Complainant's Signature: ___________________________ Date: ________________

You may attach any written materials or other information that may be relevant to your complaint.
Título VI Denuncia Forma

Título VI de la ley de derechos civiles de 1964 requiere que "ninguna persona en los Estados Unidos, por motivos de raza, color y origen nacional, se excluirá de la participación en, negar los beneficios de o ser objeto de discriminación en cualquier programa o actividad que reciba asistencia financiera federal."

La siguiente información es necesaria para que nos ayuden en el procesamiento de su queja. Si necesita cualquier ayuda para completar este formulario, háganoslo saber. Completar y devolver este formulario a Park City Transit P.O. Box 1480, Park City, Utah 84060 or 1053 Iron Horse Drive, Park City, Utah 84060.

1. Su Nombre: ____________________________________________

2. Domicilio: ____________________________________________

3. Ciudad/Estado/Código Postal: ______________________________

4. Teléfono: _____________________________________________

5. Persona discriminaciónada:
   Nombre: ________________________________________________
   Domicilio: ______________________________________________
   Ciudad/Estado/Código Postal: ______________________________

6. ¿Cuál de los siguientes mejor describe la razón por la que creo la discriminación tuvo lugar? ¿Puede ser porque?
   a. Raza: □
   b. Color: □
   c. Origen Nacional: □
   d. Otra: □

7. ¿Qué fecha la presunta discriminación llevaron a cabo? ____________________
8. En sus propias palabras, describir la presunta discriminación. Explicar lo que ocurrió y a quién considera responsable. Utilice hojas adicionales si es necesario. 

9. Lista de los usuarios que pueden tener conocimiento de este evento.

<table>
<thead>
<tr>
<th>Nombre</th>
<th>Domicilio</th>
<th>Ciudad/Estado/Código Postal</th>
</tr>
</thead>
</table>

10. ¿Han presentado esta queja con cualquier otro federal, Estado o agencia local; o con cualquier tribunal federal o estatal? Sí: ☐ No: ☐

En caso afirmativo, comprobar cada cuadro que se aplica.

Federal ☐ Federal Tribunal ☐ Estado Agencia ☐

Estado Tribunal ☐ Agencia Local ☐

11. Proporcione un nombre de contacto en la Agencia donde se presentó la denuncia.

__________________________________________

Por favor su firma: __________________________ Fecha: ________________

Puede adjuntar cualquier materiales escrito u otra información que puede ser pertinente a su queja.
E. RECORD OF INVESTIGATIONS, COMPLAINTS, LAWSUITS

Over the past three years, there were no complaints, investigations or lawsuits filed against PCT alleging discrimination on the basis of race, color, national origin, or other protected class.

F. PUBLIC PARTICIPATION PLAN-PROMOTING INCLUSIVE PUBLIC PARTICIPATION

Public involvement is fundamental and essential in achieving an equitable program, services and activities. Public participation provides for public involvement of all persons, including Native American Tribal Governments, minorities and low-income persons, affected public agencies, employees, the general public, transportation service providers, public transit users and other interested parties of the community effected by transit and transportation plans, programs and projects.
In order to integrate the considerations expressed in the USDOT Order on Environmental Justice and the USDOT LEP Guidance into community outreach activities, PCT will seek out and consider the viewpoints of minority, low-income, and LEP populations in the course of conducting public outreach and involvement activities. PCT's public participation strategy shall strive to offer early and continuous opportunities for the public to be involved in the identification of social, economic, and environmental impacts of proposed transit and transportation decisions.

G. SUMMARY OF OUTREACH EFFORTS

Public meetings and hearings are held in accessible locations for disabilities. PCT also encourages all members of the community to participate in hearings/meetings by advertising them in local media. PCT provides a variety of public meetings at various locations and times which are designed to be accessible to all members of the community. Meeting times and locations are posted in local papers, at local community organizations, and through radio announcements. For all of PCT's public meetings an advertisement is posted in the newspaper asking the public whether they have special needs so that PCT can accommodate them.

E.g.

Pursuant to the Americans with Disabilities Act, individuals needing special accommodations during the meeting should notify the City Recorder at 435-615-5007 at least 24 hours prior to the meeting.

The Park City Transit Department has a relatively large percentage of Spanish speaking drivers. Spanish speaking drivers have been asked to work with Spanish speaking riders in order to assess what services are working and should be improved to better serve the transportation needs of the Hispanic community in Park City.

PCT hired a Transit Marketing and Community Outreach Administrator in 2019 in addition to outreach efforts conducted by Park City Municipal Corporation’s (PCMC) Community Engagement Department. In order to capture unmet transit needs in the PCT service area, an onboard survey was conducted during winter of 2019 and summer of 2019.
The on board surveys were translated into Spanish. Several brochures developed by the Transit Marketing and Community Outreach Administrator have been translated into Spanish.

H. LIMITED ENGLISH PROFICIENCY (LEP) PLAN

Limited English Proficiency (LEP) individuals are those who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English. PCT provides language assistance to ensure that LEP individuals have meaningful access to its services, including route information, telephone-based customer service, printed materials including public meeting notices, and other customer based services.

PCT is in the process of applying the Four-Factor Framework needs assessment in Section V of the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficiency Persons and preparing a comprehensive LEP Plan supplementing the Title VI Plan (Appendix A.)

At minimum, PCT will:

- Provide translation services into Spanish at public meetings, as needed
- Translate customer service related transit schedules into Spanish
- Continue to translate program brochures into Spanish, as needed
- Provide training to PCT employees on how to service LEP persons
- Identify a PCT employee and or volunteer to provide Spanish translation services for customer public counter service and telephone calls to PCT
- Collaborate with minority organizations to ensure LEP persons are aware and have access to PCT services

The LEP Plan reflects the overall goal of improving and maintaining language access for PCT customers as transit riders and project recipients. The intent is to achieve a balance that ensures meaningful access to programs and services while avoiding undue burdens on PCT resources.

I. MEMBERSHIP OF NON-ELECTED COMMITTEES AND COUNCILS

PCT encourages participation on the non-elected Joint Transit Advisory Board (JTAB) of representatives involved with non-profit agencies, community groups, and health and social service agencies. Membership on JTAB is dictated by the 2009 Interlocal Agreement, as amended, between Park City and Summit County which requires that two (2) members of each respective Council sit on JTAB and are therefore not arbitrarily selected by the recipient. Currently, these seats are occupied by the following Councilmember:

- Andy Beerman, Park City Mayor
- Tim Henney, Park City Councilman
- Doug Clyde, Summit County Council
- Kim Carson, Summit County Council
J. EFFORTS TO ENSURE SUBRECIPIENT COMPLIANCE

PCT does not have any subrecipients at this time. In the event PCT does begin to pass-through funds to a subrecipient, overall monitoring and compliance reviews will be performed on PCT's subrecipients to ensure compliance with Title VI responsibilities.

K. TITLE VI EQUITY ANALYSIS

Any federally funded transit facilities and service modifications will undergo an equity analysis. Park City Transit completed the Kimball Junction Transit Center (KJTC) in Autumn 2016. During the planning stage of this project an equity analysis was not performed for the location of this facility as the facility was a transit center. However, Summit County went through the NEPA process for this project in 2011.

L. SYSTEM-WIDE SERVICE STANDARDS

Fixed-Route Effectiveness Standard – Maintain the following annual productivity levels by route:
- Park City Local Regular Route Services – 24 one-way passenger-trips per vehicle service hour.
- County Kimball Junction Routes – 20 one-way passenger-trips per vehicle service hour.
- Other County Routes – 10 one-way passenger-trips per vehicle service hour.
If route productivity figures fall below these standards, staff should conduct route segment analyses to determine what revisions (if any) could be implemented to boost ridership.

On-Time Performance Standard – 95 percent of all fixed-route trips should be operated “on time.” On-time is defined as not early and not more than five minutes late.

Park City Mobility Denial Standard – No pattern of ADA-eligible trip denials (as defined in the Americans with Disabilities Act of 1990) due to capacity constraints. Passengers whose trip request resulted in a denial will be put on a “stand-by list” maintained by the scheduler; all attempts will be made to accommodate that trip should trip cancellations occur. Regardless of whether the trip can be accommodated, the scheduler will discuss the status of the standby request with the passenger at least two hours before the requested trip time. Call backs will occur only during normal office hours. If a denial can be accommodated within the two-hour window by adding capacity, operating staff should do so in the smallest increment possible (no more than a two hour block).

Passenger Amenity Standard – Shelter should be considered at all bus stops serving 30 or more passenger boardings per day. Seating should be considered at all bus stops serving 15 or more passenger boardings per day. Benches and shelters will only be installed on existing UDOT, Park City or Summit County right-of-way, except where written confirmation from the property owner can be obtained to install a bench or shelter on private property. On an annual basis, the Transit/Transportation Manager will identify potential sites and prepare an installation priority list.

After review of the priority list by other public works staff, the Transit/Transportation Manager will contact adjacent property owners by telephone (with follow-up correspondence) to notify them of intentions to install a passenger amenity. Adjacent property owners include all owners of parcels within a 50-foot radius of placement of the bus stop sign. If an adjacent property owner protests installation at the site, Park City Transit will not immediately install it until a protest proceeding is completed. However, if passenger boardings at that bus stop exceed 20 passengers per day for a bench or 60 passengers per day for a shelter, Park City Transit will begin proceedings to install the amenity while the protest is being processed.
The protest proceedings will begin with a written notice to adjacent property owners (return receipt delivery) explaining Park City Transit’s intent to install the passenger amenity, with a copy to either the City Manager or Summit County Manager (as appropriate). This notice will detail the action being taken, projected milestones, and protest procedures available to the complainant.

**Passenger Load Standard** – For passenger safety and comfort, vehicles should be sized and the transit service operated to require standees on no more than 20 percent of the runs for any route, and to avoid any recurring loads of more than 150 percent of the seated capacity.

**Accident Standard** – Maintain a minimum of 50,000 miles traveled between preventable collision accidents, and 25,000 miles between all types of non-collision preventable accidents (i.e., employee injuries).

**Maintenance Standard** – Maintain a minimum of 20,000 miles between road calls. Road calls are defined as any time passenger service is interrupted more than five minutes due to a mechanical failure (except for flat tires).

**Vehicle Cleanliness Standard** – The exterior of each vehicle used in service will be washed daily in winter, and as needed during the summer (consistent with the City Water Conservation Program). Vehicle interiors will be swept daily and detailed at least weekly. Vehicle detailing includes mopping the floor, washing the windows, and removing any minor stains that may have accumulated on the passenger seats. A vehicle that experiences a major stain will be removed from service as soon as possible and cleaned/repaired before re-entering service.

**Vehicle Headway Standard** – Provide regularly-scheduled service with a maximum headway of 30 minutes. Express route services operate from 10 minute increments daily. Specifically, Summit County and Park City will strive to attain the following service frequency standards (in minutes):

<table>
<thead>
<tr>
<th>Service Corridor</th>
<th>Winter</th>
<th>Non-Winter</th>
</tr>
</thead>
<tbody>
<tr>
<td>Prospector Square/Deer Valley</td>
<td>20</td>
<td>20</td>
</tr>
<tr>
<td>Park Meadows/Deer Valley</td>
<td>20</td>
<td>20</td>
</tr>
<tr>
<td>Thayne’s Canyon/Deer Valley</td>
<td>20</td>
<td>20</td>
</tr>
<tr>
<td>Silver Lake/Empire Pass</td>
<td>30</td>
<td>30</td>
</tr>
<tr>
<td>Prospector Express</td>
<td>20</td>
<td>N/A</td>
</tr>
<tr>
<td>Kimball Junction – Park City</td>
<td>10</td>
<td>10</td>
</tr>
<tr>
<td>Kimball Junction – Silver Summit</td>
<td>30</td>
<td>30</td>
</tr>
<tr>
<td>Kimball Junction – Pinebrook</td>
<td>30</td>
<td>30</td>
</tr>
<tr>
<td>Ecker Hill Route</td>
<td>15</td>
<td>30</td>
</tr>
</tbody>
</table>

**Service Area Standard** – Maximize the area provided with transit service while maintaining minimum service efficiency standards. Summit County and Park City will strive to provide service within ¼ mile of all major employment, medical, shopping, and institutional centers, and of all residential areas with four or more dwellings per acre. Major employment centers are defined as an industrial or commercial zone that employs 200 or more non-agricultural, non-construction employees.

**Vehicle Accessibility Standard** – Maintain a fully accessible transit fleet (as defined by the Americans with Disabilities Act of 1990).
**Vehicle Spare Ratio Standard** – Maintain sufficient fleet spare ratios to ensure adequate capacity for regularly-scheduled and tripper services. At a minimum, a 20 percent spare ratio should be maintained for each type of vehicle in each respective service category.

**Vehicle Load Standards** - The average vehicle load standard for local routes shall not exceed the manufacturer set passengers per seat based on vehicle type and capacity. The average vehicle load standard for the express routes shall not exceed manufacturer set passengers per seat based on vehicle type and capacity.

**Fare Standard** – Maintain free fixed-route service within the Park City and Snyderville Basin areas.

**M. SERVICE POLICIES**

- **Vehicle Assignment Policy**

  PCT operates 35 foot buses throughout the system.

- **Transit Amenities Policy**

  Installation of transit amenities along bus routes include but not limited to the following criteria:

  - Number of passenger boardings
  - Safety
  - Adjacent land use
LIMITED ENGLISH PROFICIENCY PLAN

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I. INTRODUCTION AND POLICY STATEMENT

A. PURPOSE OF THIS LEP PLAN

Park City Transit (PCT) is a recipient and subrecipient of federal financial assistance and grants from Federal Transit Administration (FTA) and Federal Highway Administration (FHWA). As such, PCT must comply with Executive Order 13166-- Limited English Proficiency (LEP).

This LEP Plan is designed to assist management and staff to understand their roles and responsibilities with respect to overcoming barriers for LEP individuals. This LEP Plan will provide guidance to staff on translation, interpretation, and outreach services for LEP individuals seeking access to PCT programs and services. This LEP Plan supplements PCT’s Title VI Program Plan and the Public Participation Plan.

B. POLICY STATEMENT

PCT, under Title VI of the Civil Rights Act of 1964, ensures that no person shall, on the basis of race, color or national origin, or other protected class be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity it administers.

As clarified by Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency and resulting agency guidance, national origin discrimination includes discrimination on the basis of limited English proficiency. It is the policy of PCT to provide timely, reasonable, effective and meaningful access for LEP persons to all its programs and activities. All staff shall provide free language assistance services to LEP individuals with whom they encounter or whenever an LEP person requests language assistance services. All staff shall ensure the public is treated with dignity and respect, identify the language needs of PCT customers, and utilize available bilingual resources to assist customers, when needed.

PCT will ensure the provisions of this LEP Plan will apply and be incorporated into agreements with subgrantees and contractors as subrecipients of federal financial assistance.

II. SELF ASSESSMENT USING THE FOUR-FACTOR ANALYSIS

Park City Transit is a public entity that delivers transportation projects in Summit County, including transit services and capital improvement projects. This section sets forth the Four-Factor analysis used to determine the appropriate, reasonable, resource effective and meaningful access for LEP persons. In determining “reasonable,” there are four factors to be considered:

Factor 1 - The Number and Proportion of LEP Persons Served or Encountered in the PCT Service Area

The first step of the four factor study includes an analysis of the 2017 Park City/Summit County census data. One of the census areas is categorized as “Park City CCD, Summit
County, Utah.” This area includes Park City and areas of Summit County typically referred to as the Park City Area. This area correlates directly with the Park City/Summit County transit service area; “Within Park City limits” has a service population of approximately 7,777. The Kamas Community has a population 6,308. The Summit Park Community has a population of 7,534, over the age of 5. Of The Park City/Summit County permanent transit area (referred to hereafter as the PCPTP) has an estimated population of 22,548 over the age of 5.

**Statistical Language Breakdown**

**Source: Census 2011 - 2017**

Of the PCPTP community, census figures estimate that 14.4% of the population speaks a language other than English. Of that, 9.9% speak Spanish. Of the 9.9% Spanish speakers, 46.3% indicated that they speak English “less than very well”. Of the remaining 7.7% who speak a language other than English, 3.0% speak an, Other Indo-European” language and 0.9% speaks an Asian and Pacific Islander language. Of these two categories the amount that indicated they speak English “less than very well” is 7.6% and 44.2% respectively. This therefore equates to an estimated 4.5% of the PCPTP that speak English “less than very well” and that the percentage of Spanish speakers in the PCPTP who report the ability to speak English “less than very well” is estimated at 46.3%. (Information was obtained from the U.S. Census Park City CCD, Summit County, Utah – *Language Spoken at Home, 2013-2017 American Community Survey 5-Year Estimates* on 09/04/19 – Attached)

Of the Summit Park Community, (SPC) census figures estimate that 13.6% of the population speaks a language other than English. Of that, 7.5% speak Spanish. Of the 7.5% Spanish speakers, 43.4% indicated that they speak English “less than very well”. Of the remaining 6.1% who speak a language other than English, 4.2% speak an, Other Indo-European” language and 1.9% speaks an Asian and Pacific Islander language. Of these two categories the amount that indicated they speak English “less than very well” is 96.8% and 47.9% respectively. This therefore equates to an estimated 4.4% of SPC that speak English “less than very well” and that the percentage of Spanish speakers in the SPC who report the ability to speak English “less than very well” is estimated at 43.4%. (Information was obtained from the U.S. Census Park City CDP, Summit County, Utah – *Language Spoken at Home, 2013-2017 American Community Survey 5-Year Estimates* on 10/25/19 – Attached)

Of the Kamas Community, (KC) census figures estimate that 10.7% of the population speaks a language other than English. Of that, 2.5% speak Spanish. Of the 10.7% Spanish speakers, 55.8% indicated that they speak English “less than very well”. Of the remaining 2.5% who speak a language other than English, 0.4% speaks an, Other Indo-European” language. Of these two categories the amount that indicated they speak English “less than very well” is 100% and 55.8% respectively. This therefore equates to an estimated 2.9% of KC that speak English “less than very well” and that the percentage of Spanish speakers in the KC who report the ability to speak English “less than very well” is estimated at 55.8%. (Information was obtained from the U.S. Census Park City CDP, Summit County, Utah – *Language Spoken at Home, 2011-2017 American Community Survey 5-Year Estimates* on 11/04/19 – Attached).
In addition to 2017 census data, the analysis included efforts to reach the non-English speaking population. These efforts included talking with the directors of the Park City Community Outreach non-profit (Park City Community Outreach is not for profit organization established as an effort to coordinate services available, including transit services, to the Hispanic community in Park City) and the director of the local Park City High School Adult ESL program. The result of these conversations indicated that the local non-English speaking population currently feel that efforts to make transit information available in Spanish is adequate in understanding the transit schedules, routes and procedures/policies.

**Factor 2 - The Frequency with Which LEP Individuals Come into Contact with PCT Services**

In order to determine the frequency with which LEP individuals come in contact with transit programs, activities, and services, we look at results of the 2019 Winter and Summer Park City Transit Onboard Passenger Survey. The survey was administered in both English and Spanish (Survey questions are attached).

The goal of the survey is to aid in the development of the short range transit plan as explained in the introduction of the survey study:

An important element of providing a successful public service is to clearly understand the “customers” – those persons using the service. To gain this understanding, PCT retained AJM & Associates to conduct onboard passenger surveys of the transit services provided by Park City both within the city limits and in nearby areas of unincorporated Summit County. Winter surveys on all fixed routes were conducted, March 21 through 24, 2019.

AJM & Associates was hired to conduct the on-board transit surveys. Approximately 1,100 unique surveys were recorded. Data collected from the on-board transit surveys will help Park City Transit improve service and quantify needs of riders. It will also help dictate the direction of projects, programs, and policies for Park City’s Long Range Transportation Plan (LRTP) update efforts that are currently underway.

Surveyors obtained completed surveys that were equal to 10% of riders for a typical day. All passengers boarding buses with surveyors during the survey period were asked to complete a one page questionnaire. The survey forms consisted of a single sheet with questions in English on one side and Spanish on the other.

The summer service survey was conducted in an identical method on July 18 through 21, 2019. Results indicted on a broad basis that Winter Service accommodated an estimated 11.9% of riders which could be considered Spanish speaking LEP individuals. Of the Summer Service the survey indicated an estimated 12.9% of riders which could be considered Spanish speaking LEP individuals. (Source: Park City Transit Summer 2019 Onboard Passenger Survey, AJM & Associates, & Park City Transit Winter 2019 Onboard Passenger Survey, AJM & Associates.)
These results indicate that the amount of LEP ridership is slightly greater than the ratio indicated in census data of the PCPTP. This information is consistent with data obtained from local not for profit organizations who indicated that the Hispanic population often utilizes the Park City transit system as a source of transportation for reasons other than recreation.

**Factor 3 - Nature and Importance of the Services Provided**

Through the Winter and Summer Onboard Passenger Surveys and information provided by not for profit organizations serving the LEP population, it has been determined that while primarily a resort oriented transit system, the Park City Transit System also significantly services local population, including an LEP population in ways related to employment, education, and health services.

**Factor 4 - Resources Available to PCT to Ensure Meaningful Access to Services by LEP Individuals**

Park City Transit does not provide transit service to a population of over 200,000. The total estimated permanent transit population within the boundaries of the transit system is less than 25,000. The Park City Transit Department operates as an Enterprise Fund within the overall government of Park City Municipal Corporation. The system is managed as efficiently as possible within the structure of the available City and Transit Department resources. The Transit system operating budget is significantly small compared to large transit agencies. However, the transit system does serve a significant Hispanic ridership.

III. **LEP PLAN**

The LEP Plan reflects the overall goal of improving and maintaining language access for PCT customers as transit riders and project recipients. The intent is to achieve a balance that ensures meaningful access to programs and services while avoiding undue burdens on PCT resources. It is important to inform LEP individuals that services are available in Spanish and they are free of charge. PCT will continue to use existing resources to meet the requirements of Executive Order 13166. The most widely used LEP services will be translating verbal and written communications.

A. **Identifying LEP Individuals Needing Language Assistance**

PCT may examine customer service records to look for previous language assistance and to determine if language assistance might be needed at future events.

Have language identification cards available for individuals to identify the language they speak.

B. **Language Assistance Measures**

Language assistance will be provided to LEP individuals through the translation of vital documents, as well as through verbal language interpretation when necessary and possible.
LEP individuals are not obligated to provide their own interpreter, although many do so. Interpreters will be provided at public meetings when necessary.

In-coming calls by Spanish speaking individuals will be transferred or conferenced with PCT’s Spanish speaking dispatchers.

Vital notices will be published in local Spanish newspapers, as needed.

C. Training Staff

Staff will be trained on the following:

• PCT’s Title VI policy and LEP responsibilities
• Documentation of language assistance requests
• How to handle a potential Title VI/LEP complaint

D. Providing Notice to LEP Individuals

• Add an option to main phone recording for assistance in Spanish
• Provide a statement affirming PCT will make reasonable accommodations to provide an interpreter at public meetings and hearings with advance notice
• Continue to provide vital documents, such as Title VI complaint form and various brochures in Spanish
• Include in notifications that there is no charge for language assistance

IV. MONITORING AND UPDATING THE LEP PLAN

PCT’s Title VI Coordinator shall monitor implementation of the LEP Plan, making revisions to the plan, as may be required periodically. In monitoring compliance, an assessment will be made whether the plan allows LEP individuals to overcome language barriers and participate in a meaningful way in the program activities and services.

Monitoring shall consider information from the following sources and criteria, as well as other factors as may be appropriate:

• Changes in demographics, including new language groups, types of services and other activities
• Frequency of encounters with LEP persons
• Whether existing LEP language services are adequate
• Availability of new resources, including technology

Full review of the LEP Plan will occur with each triennial Title VI program submission.