

Notifying the Public of Rights Under Title VI

## **Reno County Public Transportation Department**

- The Reno County Public Transportation Department 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 been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with the Reno County Public Transportation Department.
- For more information on the Reno County Public Transportation Department's civil rights program, and the procedures to file a complaint, contact 1-888-458-2911, email [Barbara.lilyhorn@renogov.org](mailto:Barbara.lilyhorn@renogov.org); or visit our administrative office at 120 West Ave B, Reno County Public Transportation Department, Hutchinson, Kansas 67501. For more information, visit [www.renogov.org/rcat](http://www.renogov.org/rcat)
- 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
- If information is needed in another language, contact 1-888-458-2911

This notice is posted in the transfer station lobby at the ticket window, in the public conference rooms and on the Reno County website at [http:// www.renogov.org/rcat](http://www.renogov.org/rcat)

## Reno County Public Transportation Department Transit Public Participation Plan Outline

### 1. Brief description of provider's activities and services

Reno County Government provides service to citizens through the Reno County Public Transportation Department, which operates Reno County Area Transportation "Reno County Area Transportation". The service is financed through a combination of funds provided by the Kansas Department of Transportation U.S.C.49-5311 grant monies, Reno County tax General fund and the Reno County Elderly Mill Levy tax. Reno County Area Transportation is a community asset, which serves the public on a first come first served basis. Forms of service include Fixed Route and Specialized Transportation Services: Five Fixed Route busses provide hourly transportation throughout the cities of Hutchinson and South Hutchinson. Complimentary Para transit busses provide service to eligible passengers under the Americans with Disabilities Act (ADA) in the cities of Hutchinson and South Hutchinson within a 6-mile radius of 17th and Plum in Hutchinson. The three general criteria for Para transit eligibility established by the ADA are:

- **Can't navigate the transit system independently**
- **Needs an accessible vehicle**
- **Obstacles prevent reaching the bus**

County Route on Demand vans provides both Para transit service as well as service to able citizens who live in the county outside the defined Fixed Route and Para transit service area. Rcat also provides connection service to Wichita via the Sedgwick County Department on Aging and Wichita Transit.

### 2. Brief description of activities that would warrant public participation (i.e. fare changes, changes to service hours, route adjustments, service area changes).

The Reno County Public Transportation Department would make every reasonable effort to engage the public when making changes in fares, hours of service, route revision and service areas.

### 3. Brief description of the proactive public participation strategies would be used.

Public notification and engagement opportunities would include but not be limited to:

Social media notices – currently Facebook & Twitter, community e-mail group list serves including the Hutchinson Community Foundation, Council on Aging, Reno County Public Transportation Commission, Email notification to a database of Reno County Area Transportation stakeholders which includes TECH, Hutchinson Correctional Facility, Schools, Hutchinson Community College and Workforce Development, business owners, local elected officials, local government staff, transit staff, local media etc.

Posters in local low-income housing units and grocery stores

Public hearings/ meetings held at convenient time and in accessible locations

Advertising through local print media (The Hutchinson News, The Bee, The Rural Messenger) the Community Calendar, and local radio stations KWBW and KSKU

Rider surveys administered to a convenience sample

4. Brief description of outreach methods to engage minority and Limited English Proficiency (LEP) individuals (i.e. translation of public meeting materials, providing translation services if requested, targeted media messages in low income neighborhoods of service area, Work with existing neighborhood, advocacy organizations and faith communities).

Reno County Public Transportation Department would provide translation services (if requested) and sign language interpretation at public meetings. Notices would be sent to low income housing units and low-income neighborhood churches, schools which have high enrollment of LEP students/parents, the local office of the Kansas State Department of Children and Families, Salvation Army, HUD local office, New Beginnings housing administration etc.

5. Brief description of the desired outcomes of the agency's public participation efforts.

- The Reno County Public Transportation Department desires to have actively engaged transit riders, stakeholders and members of the general public in transit decision-making processes.
- The Reno County Public Transportation Department strives to have given adequate public notice of public participation activities and allowed proper time for public review and comment at key decision points.
- The Reno County Public Transportation Department desires to provide timely information about transportation issues and processes to transit riders, stakeholders and members of the general public
- The Reno County Public Transportation Department will provide responses to all public input as appropriate.
- The Reno County Public Transportation Department will have facilitated effective communication among a diverse group of stakeholders.
- The Reno County Public Transportation Department will have established a timetable for review of the Public Participation Process to ensure it provides full and open access to all.
- The Reno County Public Transportation Department desires to have the community at large view public transportation as community asset enriching the lives of all.

6. Brief summary of recent outreach efforts over the past three years.

- Utilized a variety of advertising platforms (i.e. newspaper, notices on board vehicles, radio ads)
- Participated in Community Events by displaying a stationary bus for the public to view and board
- Developed a database of contacts which includes: members of the public, elected officials, local government staff, Public Transit staff and drivers, local media, Senior and low income housing administration, school administrators, Hutchinson Community College Representatives and Workforce Development Director, Hutchinson Hospital and Hutchinson Clinic Representatives, Local Business owners, Hutchinson Convention and Visitor's Bureau, Downtown Hutchinson Association, City of Hutchinson Superintendent of Streets, Director of Planning and Zoning, Hutchinson Community Foundation, Municipal Airport, First Call for Help Director, Department of Children and Families Director, Horizons Mental Health Center, New Beginnings, The Volunteer Center, Prairie Star Health Clinic
- When feasible, electronically send and/or mail meeting announcements (invitations) to groups likely to be interested in the agency's activities as well as those included in the database
- Employ visualization techniques when possible to depict the agency's activities/materials to the public (i.e. charts, graphs, photo interpretation, maps,)

- Bring Rcat vehicle to speaking engagements for civic groups.
- Post relevant information and “How to ride Rcat” & How to Buy Tickets” video clips on agency website including where public comments may be submitted if necessary
- Reno County Public Transportation Commission meetings posted on county web page
- Display ads, brochures
- Local newspaper articles, advertisements, and public notices
- Avoidance of technical jargon in presentations and information displayed

### **Additional Public Participation Resources**

- Transit Cooperative Research Program, Public Participation Strategies for Transit  
[http://onlinepubs.trb.org/onlinepubs/tcrp/tcrp\\_syn\\_89.pdf](http://onlinepubs.trb.org/onlinepubs/tcrp/tcrp_syn_89.pdf)
- National Resource Directory  
<https://nrd.gov/nrdLandingPage?Categories=Transportation-Travel,Transportation-Travel/Transportation-Assistance-Public-Transportation>
- National Aging & Disability Transportation Center  
<https://www.nadtc.org/>
- Public Involvement Process from FTA  
<https://www.transit.dot.gov/regulations-and-guidance/environmental-programs/public-involvement>

**A copy of FTA’s Circular 4702.1B may be found at:**

[http://www.fta.dot.gov/documents/FTA\\_Title\\_VI\\_FINAL.pdf](http://www.fta.dot.gov/documents/FTA_Title_VI_FINAL.pdf)

## **Limited English Proficiency (LEP) Plan**

### **Four Factor Analysis**

**(1) Identify number of or proportion of LEP individuals that can utilize the service provided by Reno County Area Transportation**

According to the most current published (2017) American Community Survey data, the combined populations in the cities of Hutchinson and South Hutchinson have one language group (Spanish) that represent more than 5% of the composite population (5.127%) and more than 50 persons who speak English less than very well. Both cities have a significant number of bilingual (Spanish or German/Swiss) individuals due to descendent populations of Hispanic (prior to WWII), and Mennonite/ Amish who settled in the county during the European immigration period.

**(2) Identify the frequency in which LEP individuals encounter the service:**

Reno County Area Transportation serves non-English speaking individuals approximately 3-4 times yearly and family members or friends have provided translation.

**(3) Identify the importance of the service to the LEP community:**

Reno County Area Transportation fills a critical need within the community by providing transportation for employment, educational, social, shopping, medical, and business needs for residents of all ages. Reno County Area Transportation is the only method of transportation for many individuals.

**(4) Identify the resources available and the respective costs of these resources:**

Although not formally trained as translators, the many bilingual individuals within the community are a readily available resource whom non-English speaking individuals have utilized through their own choice, at no cost. On-Demand Phone Interpretation service costs \$1.50 per minute.

## **Limited English Proficiency Plan**

Utilizing the information gathered from the Four Factor Analysis, the following plan is developed in order to provide the necessary assistance to LEP persons.

### **Identified LEP individuals**

According to the 2017 American Community Survey data, the combined population in the cities of Hutchinson and South Hutchinson have one language group, Spanish, that represent more than 5% of the population and more than 50 persons who speak English less than very well.

### **Language Assistance Measures**

When needed Reno County Area Transportation would utilize online translation tools, local school district document translation services, Braille services available through the Prairie Independent Living Center and sign language interpretation services when critically necessary. Reno County Area Transportation has I Speak Cards on file and has access to On-Demand Phone Interpretation service for 100 different languages.

### Training Staff

Reno County Area Transportation Director, Assistant Director, and Dispatch staff will have an awareness of online translation tools as a result of self-teaching.

Awareness of Telephone Translation Services, local school district document translation services, and Braille services available through the Prairie Independent Living Center as well as sign language interpretation services when critically necessary will be included during new hire orientation and training. Periodic updates and refreshers regarding these services will be included during regular and ongoing departmental staff training.

All staff will be made aware of the I Speak Cards.

### Providing Notice

The Reno County Area Transportation LEP plan will be posted on the Reno County website [www.renogov.org/rcat](http://www.renogov.org/rcat). The Reno County Area Transportation LEP plan will be provided to any person or agency requesting a copy. The contact person for the Reno County Area Transportation LEP plan is Barbara Lilyhorn. She can be reached via phone at 620-694-2910.

LEP individuals who wish to file a complaint will be directed to utilize the Title VI Complaint Procedures.

### Monitoring and Updating LEP Plan

Reno County Area Transportation will update the LEP plan according to the Title VI update schedule which is every three years. Reno County Area Transportation will provide ongoing monitoring of changes in local demographic by reading yearly reports i.e. Kansas Kids Count and through local media. The plan will also be updated anytime changes in the demographics of the agencies service area are deemed significant regarding LEP persons.

## Title VI Complaint Procedure

### Title VI Complaint Procedures

The following pertains only to Title VI complaints regarding the services of the Reno County Public Transportation Department

Title VI, 42 U.S.C. §2000d et seq., was enacted as part of the Civil Rights Act of 1964. At the heart of the regulation is the statement that:

*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.*

The Reno County Public Transportation Department has in place a Title VI Complaint Procedure, which outlines a process for local disposition of Title VI complaints and is consistent with guidelines found in Chapter III of the Federal Transit Administration Circular 4702.1B, dated October 1, 2012. If you believe that the Reno County Public Transportation Departments federally funded programs have discriminated your civil rights based on race, color, or national origin you may file a written complaint by following the procedure outlined below:

#### 1. Submission of Complaint.

Any person who feels that he or she, individually or as a member of any class of persons, on the basis of race, color, or national origin has been excluded from or denied the benefits of, or subjected to discrimination caused by the Reno County Public Transportation Department, may file a written complaint with the Reno County Public Transportation Department's Director. A sample complaint form is available for download at [www.renogov.org/rcat](http://www.renogov.org/rcat) and is available in hard copy at the offices of Reno County Public Transportation Department. Upon request, the Reno County Public Transportation Department will mail the complaint form. **Such complaints must be filed within 180 calendar days after the date the discrimination occurred.**

**Assistance in the preparation of any complaints will be provided to a person or persons upon request and as appropriate. If information is needed in another language, then contact Barbara Lilyhorn, (620)694-2910**

Complaints should be mailed to or submitted by hand to:

120 West Ave B  
Hutchinson, Kansas 67501  
ATTN: Director

#### 2. Referral to Review Officer

Upon receipt of the complaint, the Reno County Public Transportation Director shall appoint one or more staff review officers, as appropriate, to evaluate and investigate the complaint. If necessary, the Complainant shall meet with the staff review officer(s) to further explain his or her complaint. The staff review officer(s) shall complete their review no later than 45 calendar days after the date the agency received the complaint. If more time is required, the Reno County Public Transportation Director shall notify the Complainant of the estimated timeframe for completing the review. Upon completion of the review, the staff review officer(s) shall make a recommendation regarding the merit of the complaint and whether remedial actions are available to provide redress. Additionally, the staff review officer(s) may recommend improvements to the Reno County Public Transportation Department's processes

relative to Title VI, as appropriate. The staff review officer(s) shall forward their recommendations to the, Reno County Public Transportation Director for concurrence. If the Reno County Public Transportation Director concurs, he or she shall issue the Reno County Public Transportation Department's written response to the Complainant. This final report should include a summary of the investigation, all findings with recommendations, corrective measures where appropriate.

**Note: Upon receipt of a complaint, the Reno County Public Transportation Department shall forward a copy of this complaint and the resulting written response to the appropriate KDOT and FTA-Region 7 contacts.**

### **3. Request for Reconsideration**

If the Complainant disagrees with the Reno County Public Transportation Director's response, he or she may request reconsideration by submitting the request, in writing, to the Reno County Public Transportation Director within 10 calendar days after receipt of the Reno County Public Transportation Director response. The request for reconsideration shall be sufficiently detailed to contain any items the Complainant feels were not fully understood. The Reno County Public Transportation Director will notify the Complainant of his or her decision in writing either to accept or reject the request for reconsideration within 10 calendar days. In cases where the Reno County Public Transportation Director agrees to reconsider, the matter shall be returned to the staff review officer(s) to re-evaluate in accordance with Paragraph 2 above.

### **4. Appeal**

If the request for reconsideration is denied, the Complainant may appeal the Reno County Public Transportation Director's response by submitting a written appeal to Reno County Public Transportation Commission no later than 10 calendar days after receipt of the Reno County Public Transportation Director 's written decision rejecting reconsideration. The Reno County Public Transportation Commission will then determine to either request re-evaluation by the staff review officer(s) or forward the complaint to KDOT for further investigation.

### **5. Submission of Complaint to the State of Kansas Department of Transportation.**

If the Complainant is dissatisfied with the Reno County Public Transportation Department's resolution of the complaint, he or she may also submit a written complaint within 180 days after the alleged date of discrimination to the State of Kansas Department of Transportation for further investigation.

Kansas Department of Transportation  
Office of Civil Rights Compliance  
700 SW Harrison, 3rd Floor West  
Topeka, Kansas 66603-3754  
Phone: 785-296-7940 Fax: 785-296-0723  
KDOT.CivilRights@ks.gov

## Reno County Public Transportation Department Title VI Complaint Form

The purpose of this form is to assist you in filing a complaint with the Reno County Public Transportation Department. You are not required to use this form; a letter containing the same information will be enough.

<b>Section I:</b>			
Name:			
Address:			
Telephone (Home):		Telephone (Work):	
Electronic 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>			

<b>Section IV</b>		
Have you previously filed a Title VI complaint with this agency?	Yes	No
<b>Section V</b>		

Have you filed this complaint with any other Federal, State, or local agency, or with any Federal or State court?  
 Yes                       No

If yes, check all that apply:

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

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

Name: \_\_\_\_\_  
Title: \_\_\_\_\_  
Agency: \_\_\_\_\_  
Address: \_\_\_\_\_  
Telephone: \_\_\_\_\_

**Section VI**

Name of agency complaint is against: \_\_\_\_\_  
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:

Signature \_\_\_\_\_ Date \_\_\_\_\_

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

Reno County Public Transportation Department  
120 West Ave B  
Hutchinson, Kansas  
ATTN: Director

**List of Title VI Investigations, Lawsuits and Complaints**

	Date Submitted/Filed (Month, Day Year)	Summary of allegation (include basis of complaint: race, color or national origin)	Status	Resolution/Action Taken

Investigations				
1				
2				
Lawsuits				
1				
2				
Complaints				
1				
2				

**Table Depicting Membership of Reno County Public Transportation Department Committees, Councils, Broken Down by Race**

<b>Body</b>	<b>Caucasian</b>	<b>Latino</b>	<b>African American</b>	<b>Asian American</b>	<b>Native American</b>	<b>Other</b>
<b>Reno County Population within service area</b>	90.1%	11.6%	3.8%	0.72%	0.91%	1.4%
<b>Board of County Commissioners</b>	100%	0%	0%	0%	0%	0%
<b>Reno County Public Transportation Commission Advisory Council</b>	90%	10%	0%	0%	0%	0%

The Reno County Public Transportation Commission (RCPTC) was established by resolution 99-44 by the Reno County Board of Commissioners. The RCPTC is subordinate to the Reno County Board of Commissioners (BOC) and members are appointed by the BOC. Representatives from the following areas or concerns shall be given consideration for appointment to the commission: City of Hutchinson, small towns, persons involved with public and private education and the business community, disabled persons and senior citizens. Minorities are encouraged to seek membership through active promotion of vacancies by current members, at public meetings/events and to users of public transportation.

## **Reno County Public Transportation Department Fixed Route Service Standards and Policies**

### **Vehicle Load**

15 Passenger Route bus

- 12 Ambulatory + 1 Wheelchair + driver =14 passengers

Load Factor

- $1 \rightarrow (14 \times 0.07) + 14 = 15$  (Rounded up from .98) – One standee permitted

### **Policy:**

**The average of all loads during the peak operating period should not exceed the vehicles' maximum operating capacity. The maximum operating capacity for the 15-passenger fixed route vehicle with 12 ambulatory seats and 1 wheelchair seat plus the driver is 15 passengers. This is associated with a maximum load factor of 1.**

### **Headway**

**Reno County Public Transportation Department Policy:**

**The maximum headway for any fixed route in the Reno County Public Transportation Department transit system is 60 minutes. 60-minute headways allow for the most efficient operation of our current fixed route system.**

### **On-Time Performance**

**Reno County Public Transportation Department Policy:**

**90% of all fixed route transit vehicles will arrive at the designated stops on-time. A vehicle is considered on-time if it arrives at the stop less than 5 minutes early and no more than 5 minutes late.**

### **Service Availability**

**Reno County Public Transportation Department Policy:**

**35% of the population in our fixed route service area will be within ¼ mile of a walk and ride fixed route. Fixed route busses will provide hourly service from 6 a.m. until 7 p.m. weekdays and from 7 a.m. until 6 p.m. on Saturdays.**

### **Vehicle Assignment**

**Reno County Public Transportation Department Policy:**

Fixed route transit vehicles should be operated in a manner that will equalize the mileage of each vehicle over the service life of the unit. Vehicles should be rotated based on the mileage of the route and the mileage of the vehicle so that not one vehicle will continually operate more miles than another within a reasonable variation and taking into consideration extended downtime for repair.

**Transit Amenities**

**Reno County Public Transportation Department Policy:**

New transit amenities installed by the Reno County Public Transportation Department will be constructed in a manner that the number of passenger boarding's at a location will determine the order of construction. The location with the highest number of boarding's will be the first with added amenities.