

Title VI Program  
for  
Jump Around Carson (JAC)



Federal Fiscal Year 2026 - 2028

Approved date: 9/10/2025





**Table of Contents**

1.0 Title VI Program Overview ..... 2

1.1 Non-Discrimination Policy Statement..... 2

1.2 Title VI/Non-Discrimination Assurances ..... 2

2.0 TITLE VI REQUIREMENTS & RESPONSES ..... 4

2.1 GENERAL REPORTING REQUIREMENTS ..... 4

2.1.1 Requirement to provide Title VI assurances ..... 4

2.1.2 Requirement to prepare and submit a Title VI Program ..... 4

2.1.3 Requirement to notify beneficiaries of protection under Title VI ..... 4

2.1.4 Requirement of Title VI complaint procedures and complaint form ..... 5

2.1.5 Requirement to record and report transit-related Title VI complaints, investigations,  
and lawsuits ..... 5

2.1.6 Requirement to promote inclusive public participation ..... 5

2.1.7 Requirement to provide meaningful access to LEP persons..... 6

2.1.8 Requirement to encourage minority representation on planning and advisory bodies 6

2.1.9 Requirement to provide assistance to subrecipients..... 7

2.1.10 Requirement to monitor subrecipients..... 7

2.1.11 Requirement relating to determination of site or location of facilities ..... 7

2.1.12 Requirement to provide additional information upon request ..... 8

2.2 REQUIREMENTS FOR FIXED ROUTE TRANSIT PROVIDERS..... 8

2.2.1 Requirements to set system-wide service standards and policies ..... 9

ATTACHMENTS

A – Physical & Website Documentation

B – Complaint List, Procedures & Forms (English & Spanish

C – Language Assistance Plan

D – System-Wide Service Standards & Policies

E – Subrecipient Compliance Assessment Tool



## 1.0 Title VI Program Overview

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

### 1.1 Non-Discrimination Policy Statement

It is the policy of CAMPO and JAC that no person shall on the grounds of race, color, sex or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination in any transit related activity as provided by Title VI of the Civil Rights Act of 1964 and related statutes such as The Civil Rights Restoration Act of 1987.

This policy applies to all operations of CAMPO and/or JAC, including its contractors and anyone who acts on their behalf. This policy also applies to the operations of any department or agency to which the CAMPO extends federal financial assistance.

Prohibited discrimination may be intentional or unintentional. Seemingly neutral acts that have disparate impacts on individuals of a protected group and lack a substantial legitimate justification are a form of prohibited discrimination. Harassment and retaliation are also prohibited forms of discrimination.

Examples of prohibited types of discrimination based on race, color, or national origin include: Denial to an individual of any service, financial aid, or other benefit; Distinctions in the quality, quantity, or manner in which a benefit is provided; Segregation or separate treatment; Restriction in the enjoyment of any advantages, privileges, or other benefits provided; Discrimination in any activities related to highway and infrastructure or facility built or repaired; and Discrimination in employment.

### 1.2 Title VI/Non-Discrimination Assurances

Per federal regulations, CAMPO, as a recipient of federal funds is required to sign assurances that pledge:

Title VI of the Civil Rights Act of 1964 states:

*"No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance."* CAMPO is committed





to ensuring no person on the basis of race, color, or national origin will be excluded from participation or subjected to discrimination in the level and quality of transit services or related benefits provided by CAMPO's employees, affiliates, or contractors as is outlined in Title VI of the Civil Rights Act of 1964.

**Making a Title VI Complaint:**

Any person who believes that they have been subject to unlawful discriminatory practice under Title VI may file a complaint with CAMPO and/or JAC. Any such complaint must be in writing and filed within 180 days following the date of the alleged discriminatory occurrence. For information on how to file a complaint, see Attachment B

FTA Circular 4702.1B Chapter 4.3 requires the appropriate governing board(s) to approve the transit agencies Title VI plan. This Title VI plan has been presented to the Carson Area Metropolitan Planning Organization for approval.

**CAMPO APPROVAL:**



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Greg Novak, Chair

Carson Area Metropolitan Planning Organization

9-16-2025

Date





## 2.0 TITLE VI REQUIREMENTS & RESPONSES

### 2.1 GENERAL REPORTING REQUIREMENTS

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

#### 2.1.1 Requirement to provide Title VI assurances

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

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

#### 2.1.2 Requirement to prepare and submit a Title VI Program

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

**Response:** CAMPO will continue to submit a Title VI Program to the FTA Region IX Civil Rights Officer once every three (3) years. The last plan was submitted on January 13, 2023.

#### 2.1.3 Requirement to notify beneficiaries of protection under Title VI

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

**Response:** CAMPO staff oversees the JAC public transportation system in the urbanized area of Carson City and has included a notice of beneficiary rights under Title VI, per the guidelines in Appendix B of Circular 4702.1B. This notice is in English and Spanish and is posted on the CAMPO website ([www.carsonareampo.com](http://www.carsonareampo.com)) and the JAC website ([www.ridejac.com](http://www.ridejac.com)). In addition, a notice is publicly displayed in the Carson City Public Works



office, JAC administrative office and on JAC fixed route and paratransit brochures which are available on every transit vehicle and distributed throughout Carson City. A screenshot of the website and a picture of the notice posted in the JAC Administrative Office are available in Attachment A.

#### 2.1.4 Requirement of Title VI complaint procedures and complaint form

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

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

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

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

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

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

#### 2.1.6 Requirement to promote inclusive public participation

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

**Response:** CAMPO's Public Participation Plan (PPP), approved in July 2023, identifies the goals, strategies, and tools to be used to encourage public participation. The plan was developed in accordance with the guidelines under the Final Rule of 23 CFR §450.316 Metropolitan Transportation Planning and is in compliance with all federal laws and regulations, including adherence to Title VI of the Civil Rights Act of 1964 and the Americans with Disabilities Act of 1990. CAMPO ensures that minority, LEP, and low-income populations, as with all members of the public, are empowered to participate in decisions related to CAMPO and the JAC transit system. This Public Participation Plan can be found online at: <https://www.carson.org/home/showpublisheddocument/86399/638248596043770000>

JAC developed a Transit Development and Coordinated Human Services Plan (TDCHSP) in October 2019 and is in the process of updating the plan for FY 2026-2028. The TDCHSP serves three primary objectives: (1) a short-range (1-5 year) planning document; (2) a long-range (10-20 year) planning document; and (3) a coordinated public transit-human services planning document. The development of the Plan consisted of several public outreach events, including an online survey and two public workshops.

### 2.1.7 Requirement to provide meaningful access to LEP persons

**Requirement:** Consistent with Title VI of the Civil Rights Act of 1964, USDOT's implementing regulations, recipients shall take reasonable steps to ensure meaningful access to benefits, services, information, and other important portions of their programs and activities for individuals who are considered limited-English proficient (LEP).

**Response:** CAMPO has updated its Language Assistance Plan (LAP) for JAC (see Attachment C) to include data from the *2019 American Community Survey (ACS) Block Group 5-Year Estimates*. The LAP applies the Four Factor Framework specified by the U.S. Department of Transportation (DOT), and includes an implementation plan consistent with DOT Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons.

### 2.1.8 Requirement to encourage minority representation on planning and advisory bodies

**Requirement:** Title 49 CFR Section 21.5(b)(1)(vii) states that a recipient may not, on the grounds of race, color, or national origin, "deny a person the opportunity to participate as a member of a planning, advisory, or similar body which is an integral part of the program." Recipients that have transit-related, non-elected planning boards, advisory councils or committees, or similar committees, the membership of which is selected by the recipient, must provide a table depicting the racial breakdown of the membership of those committees, and a description of efforts made to encourage the participation of minorities on such committees.

**Response:** CAMPO does not have a transit-related, non-elected planning board, advisory council, or similar board where the membership is selected by CAMPO. It therefore does not have a racial breakdown of membership of those committees to depict. Any such

body/ies that is/are created in the future will encourage the participation of minorities, and the relevant table will be created to show the racial composition of its/their members.

### 2.1.9 Requirement to provide assistance to subrecipients

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

**Response:** CAMPO currently has one subrecipient and is committed to providing assistance to ensure compliance with USDOT’s Title VI regulations, including the general reporting requirements. CAMPO will perform an initial review of its subrecipients Title VI program to ensure compliance and will use a compliance assessment tool thereafter to monitor continued compliance. Title VI program updates will be due from the subrecipient by January 30<sup>th</sup> annually. A copy of the Compliance Assessment Tool can be found in Attachment E.

### 2.1.10 Requirement to monitor subrecipients

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

**Response:** CAMPO currently has one subrecipient, who will be monitored for compliance as required. CAMPO understands that if its Subrecipient is not in compliance with Title VI requirements, the primary recipient, CAMPO, is also not in compliance. CAMPO will perform an initial review of its subrecipients Title VI program to ensure compliance and will use a compliance assessment tool thereafter to monitor continued compliance. Title VI program updates will be due from the subrecipient by January 30<sup>th</sup> annually. A copy of the Compliance Assessment Tool can be found in Attachment E.

### 2.1.11 Requirement relating to determination of site or location of facilities

**Requirement:** Title 49 CFR Section 21.9(b)(3) states, “In determining the site or location of facilities, a recipient or applicant may not make selections with the purpose or effect of excluding persons from, denying them the benefits of, or subjecting them to discrimination under any program to which this regulation applies, on the grounds of race, color, or national origin; or with the purpose or effect of defeating or substantially impairing the accomplishment of the objectives of the Act or this part. “Title 49 CFR part 21, Appendix C, Section (3)(iv) provides, “The location of projects requiring land acquisition and the



displacement of persons from their residences and businesses may not be determined on the basis of race, color, or national origin.” For the purposes of this requirement, “facilities” does not include bus shelters, as these are transit amenities and are covered in Chapter IV, nor does it include transit stations, power substations, etc. as those are evaluated during project development and the National Environmental Policy Act (NEPA) process. Facilities included in this provision include, but are not limited to, storage facilities, maintenance facilities, operations centers, etc.

**Response:** CAMPO will ensure that environmental analysis, including NEPA requirements, are incorporated into the scope of work for all facilities projects requiring land acquisition and the displacement of persons from their residences and businesses:

1. CAMPO will complete a Title VI Analysis during the planning stage with regard to where a project (such as a new transit center) is located or sited to ensure the location is selected without regard to race, color, or national origin. CAMPO will engage in outreach to persons potentially impacted by the siting of facilities. The Title VI Analysis will compare the equity impacts of various siting alternatives, and the analysis will occur before selection of the preferred site.
2. When evaluating locations of facilities, CAMPO will give attention to other facilities with similar impacts in the area to determine if any cumulative adverse impacts might result. Analysis will be done at the Census tract or block group level where appropriate to ensure that proper perspective is given to localized impacts.
3. If CAMPO determines the location of the project will result in a disparate impact on the basis of race, color, or national origin, CAMPO will only locate the project in that location if there is a substantial legitimate justification for locating the project there, and where there are no alternative locations that would have a less disparate impact on the basis of race color or nation origin. CAMPO will show how both tests are met and will consider and analyze alternatives to determine whether those alternatives would have less of a disparate impact on the basis of race, color, or national origin, and then implement the least discriminatory alternative.

### 2.1.12 Requirement to provide additional information upon request

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

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

## 2.2 REQUIREMENTS FOR FIXED ROUTE TRANSIT PROVIDERS

Chapter IV of FTA Circular 4702.1B discusses the additional reporting requirements for all recipients and subrecipients of FTA funding that operate fixed route transit service, to ensure

that each agency complies with USDOT Title VI regulations. JAC does not currently meet the threshold for additional requirements applicable to transit providers that operate 50 or more fixed route vehicles in peak service and are located in a UZA of 200,000 or more in population.

Below is a summary of the requirements and how CAMPO's Title VI Program fulfills each of those requirements.

### 2.2.1 Requirements to set system-wide service standards and policies

**Requirement:** Title 49 CFR Section 21.5 states the general prohibition of discrimination on the grounds of race, color, or national origin. Section 21.5(b)(2) specifies that a recipient shall not "utilize criteria or methods of administration which have the effect of subjecting persons to discrimination because of their race, color, or national origin, or have the effect of defeating or substantially impairing accomplishment of the objectives of the program with respect to individuals of a particular race, color, or national origin." Section 21.5(b)(7) requires recipients to "take affirmative action to assure that no person is excluded from participation in or denied the benefits of the program or activity on the grounds of race, color, or national origin." Finally, Appendix C of Title 49 CFR part 21 provides in Section (3)(iii) that "[n]o person or group of persons shall be discriminated against with regard to the routing, scheduling, or quality of service of transportation service furnished as a part of the project on the basis of race, color, or national origin. Frequency of service, age and quality of vehicles assigned to routes, quality of stations serving different routes, and location of routes may not be determined on the basis of race, color, or national origin"

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

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

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

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

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

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

- Vehicle Load
- Vehicle Headways
- On-time performance
- Service availability

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

- Distribution of transit amenities
- Vehicle assignment

## ATTACHMENTS

- A – Physical & Website Documentation
- B – Complaint List, Procedures & Forms (English & Spanish)
- C – Language Assistance Plan
- D – System-Wide Service Standards & Policies
- E – Subrecipient Compliance Assessment Tool






# Attachment A


## Physical & Website Documentation



<https://www.carson.org/government/departments-g-z/public-works/transportation/jac-jump-around-carson>

**CARSON CITY**  
NEVADA

SERVICESOUR CITYGOVERNMENTBUSINESSSERVICE FINDERQ



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

Ridership continues to grow as residents discover the convenience and value of the bus system for going to work, school, shopping, medical appointments and recreation facilities. Strategically placed stops throughout the community make it easy for passengers to conveniently visit a number of the city's most popular destinations. Fares are only \$1.50 per one-way trip for adults; and seniors, persons with disabilities and youth may ride for only \$0.75 per one-way trip.

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

[Fiscal Year 2021 Transit Monitoring Report](#)

[2019 JAC Transit Development and Coordinated Human Services Plan](#)

[Title VI Program FFY 2023-25](#)

[Disadvantaged Business Enterprise \(DBE\) Program Goal FFY 2023-2025](#)





[Public Transportation Agency Safety Plan Federal Fiscal Year 2024](#)

[General Transfer Feed Specification \(GTFS\) Download](#)

[CAMPO Zero Emission Transition Plan](#)

[Carson City JAC Transit Center Study 2023](#)

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



**Beneficiary Rights Under Title VI**

JAC is committed to ensuring that no person shall, on the basis of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal assistance, and that no discrimination takes place in any of the programs it and its subrecipients operate. To obtain more information on JAC's nondiscrimination obligations, send a written request to the address below or click [here](#). If anyone feels that he/she or others protected by Title VI have been discriminated against, a complaint may be filed. To file a complaint, complete the form at the link below and send to Transportation Manager, 3505 Butti Way, Carson City, NV, 89701, RE: Title VI Complaint. A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.

[Title VI Complaint Form](#)

## Beneficiary Rights Under Title VI (as posted publicly in JAC Administrative Offices)

### DERECHOS DEL BENEFICIARIO BAJO EL TÍTULO VI

El sistema de tránsito (JAC) opera sus programas y servicios sin distinción de raza, color y origen nacional de acuerdo con el Título VI de la Ley de Derechos Civiles. Cualquier persona que crea que ha sido perjudicada por alguna práctica discriminatoria ilegal bajo el Título VI puede presentar una queja ante JAC.

Para obtener más información sobre las obligaciones de discriminación de JAC, llame al (775) 283-7583; e-mail a [JAC@carson.org](mailto:JAC@carson.org); visite [www.ridejac.com](http://www.ridejac.com); o visite nuestra oficina de operaciones de JAC, 3770 Butti Way, Carson City, NV 89701.

El demandante puede presentar una queja directamente con la Administración Federal de Tránsito presentando una queja ante la Oficina de Derechos Civiles, Atención: Coordinador del Programa Título VI, East Building, 5th Floor -TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.

Si necesita información en otro idioma, llame al 775-283-7583.

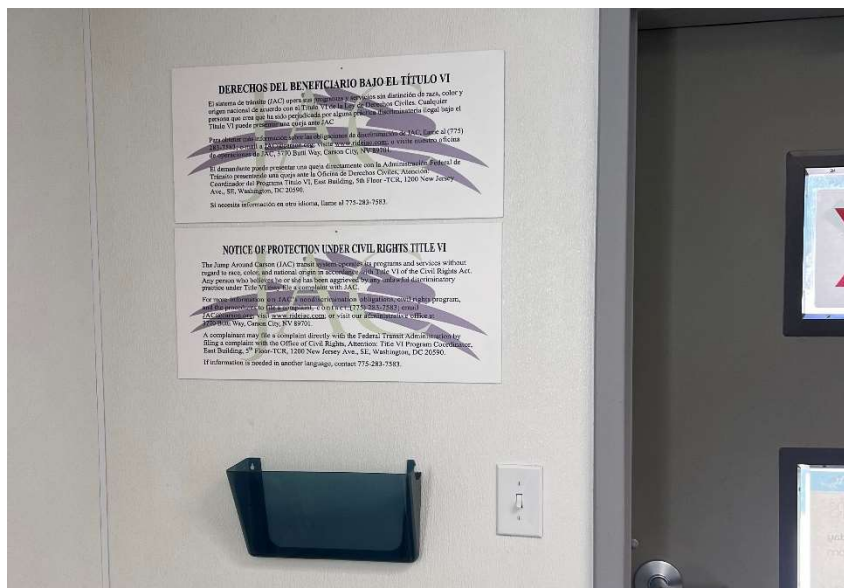
### NOTICE OF PROTECTION UNDER CIVIL RIGHTS TITLE VI

The Jump Around Carson (JAC) transit system 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 he or she has been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with JAC.

For more information on JAC's nondiscrimination obligations, civil rights program, and the procedures to file a complaint, contact (775) 283-7583; email [JAC@carson.org](mailto:JAC@carson.org); visit [www.ridejac.com](http://www.ridejac.com); or visit our administrative office at 3770 Butti Way, Carson City, NV 89701.

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, 5<sup>th</sup> Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.

If information is needed in another language, contact 775-283-7583.





# Attachment B

## Complaint List, Procedures & Forms (English & Spanish)





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

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

CAMPO acknowledges per FTA Circular 4702.1B, “all recipients are required to prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, or national origin”:

- Active investigations conducted by FTA and entities other than FTA;
- Lawsuits; and
- Complaints naming the recipient

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

### Investigations, Complaints, and Lawsuits

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





## **TITLE VI COMPLAINT PROCEDURES**

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

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

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

All Title VI complaints shall be investigated and addressed with a formal written response within 90 days of the date the complaint is received. If more information is needed to resolve the case, CAMPO may contact the complainant. The complainant has 30 days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within 30 days, CAMPO can administratively close the case. A case can be administratively closed if the complainant no longer wishes to pursue their case.

After the investigator reviews the complaint, she/he will issue one of two letters to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states there was not a Title VI violation and the case will be closed. An LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member, or other action will occur. If the complainant wishes to appeal the decision, she/he has 30 days after the date of the letter or the LOF to do so. If required, the LOF with corrective actions taken will be forwarded to the Federal Transit Administration.

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

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



## TITLE VI COMPLAINT FORM

### Staff Use Only

Date of Complaint Received: \_\_\_\_\_

Tracking No. \_\_\_\_\_

All Title VI complaints shall be investigated and addressed with a formal written response within **90 days** of the date the complaint is received. If more information is needed to resolve the case, CAMPO may contact the complainant. The complainant has 30 days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within 30 days, CAMPO can administratively close the case. A case can be administratively closed if the complainant no longer wishes to pursue their case.

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

Name of Complainant: \_\_\_\_\_

Address: \_\_\_\_\_ City/State: \_\_\_\_\_

Email Address: \_\_\_\_\_ Phone Number: \_\_\_\_\_

Accessible Format Requirements? Large Print ☐ Audio Tape ☐ TDD ☐ Other ☐ \_\_\_\_\_

Person Discriminated Against (if other than Complainant): \_\_\_\_\_

Address: \_\_\_\_\_ Phone Number: \_\_\_\_\_

Email Address: \_\_\_\_\_

Please explain why you have filed for a third party: \_\_\_\_\_

Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party: Yes ☐ No ☐

Date, Time & Place Incident Occurred: \_\_\_\_\_

Nature of Complaint:

☐ Race ☐ Color ☐ National Origin ☐ Sex ☐ Age ☐ Disability ☐ LEP

Other: \_\_\_\_\_



Details of Complaint: please describe all persons who were involved. Include the name and contact information of the person(s) who discriminated against you (if known) as well as names and contact information of any witnesses. If more space is needed, please use the back of this form.

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Date & Time Discrimination Occurred: \_\_\_\_\_

Place Incident Discrimination Occurred: \_\_\_\_\_

Were there any other witnesses to the discrimination?

Name	Organization/Title	Telephone

How would you like to see this situation resolved?

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Have you filed your complaint, grievance, or lawsuit with any other agency or court?

Who \_\_\_\_\_

When \_\_\_\_\_

Status (pending, resolved, etc.) \_\_\_\_\_

Result, if known \_\_\_\_\_

Complaint number, if known \_\_\_\_\_

Have you filed a lawsuit regarding this complaint? Yes \_\_\_\_\_ No \_\_\_\_\_

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

Signature and date required below

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

Please submit this form in person, or mail to:

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

Complaint Taken By \_\_\_\_\_

INVESTIGATION \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

ACTION RECOMMENDED \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

By \_\_\_\_\_

RECORD OF FINAL ACTION \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

By \_\_\_\_\_



## **TÍTULO VI PROCEDIMIENTOS DE QUEJA**

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

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

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

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

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

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

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



## TITULO VI FORMULARIO DE QUEJA

### Solo Para Uso de Empleados

Date of Complaint Received: \_\_\_\_\_

Tracking No. \_\_\_\_\_

All Title VI complaints shall be investigated and addressed with a formal written response within **90 days** of the date the complaint is received. If more information is needed to resolve the case, CAMPO may contact the complainant. The complainant has 30 days from the date of the letter to send requested information to the investigator assigned to the case. If the investigator is not contacted by the complainant or does not receive the additional information within 30 days, CAMPO can administratively close the case. A case can be administratively closed if the complainant no longer wishes to pursue their case.

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

Nombre del Reclamante: \_\_\_\_\_

Dirección: \_\_\_\_\_ Ciudad/Estado: \_\_\_\_\_

Correo Electrónico: \_\_\_\_\_ Número de Teléfono: \_\_\_\_\_

¿Requisitos de formato accesible? Impresión en letra grande ☐ Cinta de audio ☐ TDD ☐  
Otro ☐ \_\_\_\_\_

Persona Discriminada (si no es quien presenta la queja): \_\_\_\_\_

Dirección: \_\_\_\_\_ Número de Teléfono: \_\_\_\_\_

Correo Electrónico: \_\_\_\_\_

Por favor explique por qué presento la queja en representación de otra persona: \_\_\_\_\_

Por favor confirme que obtuvo el permiso de la persona afectada si está presentando en nombre de otra persona: Sí ☐ No ☐

Día, hora y lugar del Incidente: \_\_\_\_\_

Naturaleza de la queja:

☐ Raza ☐ Color ☐ Origen nacional ☐ Sexo ☐ Edad ☐ Discapacidad

☐ Habilidad limitada en inglés

Otro: \_\_\_\_\_

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

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Fecha y hora en que ocurrió la discriminación: \_\_\_\_\_

Lugar donde ocurrió la discriminación: \_\_\_\_\_

¿Hubo otros testigos de la discriminación?

Nombre	Organización/Cargo	Teléfono

¿Como le gustaría ver que se resuelva esta situación?

---

---

---

¿Ha presentado su queja, reclamación o demanda ante alguna otra agencia o tribunal?

¿Quien? \_\_\_\_\_

¿Cuándo? \_\_\_\_\_

Estado (pendiente, resuelto, etc.) \_\_\_\_\_

Resultado, si se conoce \_\_\_\_\_

Número de la queja, si se conoce \_\_\_\_\_

¿Ha presentado una demanda relacionada con esta queja? Sí \_\_\_\_\_ No \_\_\_\_\_

Puede adjuntar cualquier material escrito y otra información que considere relevante para su queja. Se requiere firma y fecha a continuación.

\_\_\_\_\_  
Firma

\_\_\_\_\_  
Fecha

Por favor presente este formulario en persona o envíelo por correo a:

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

Queja recibida por: \_\_\_\_\_

INVESTIGACIÓN \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

ACCIÓN RECOMENDADA \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Hecha por \_\_\_\_\_

REGISTRÓ DE ACCIÓN FINAL \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Hecha por \_\_\_\_\_



# Attachment C

## Language Assistance Plan





# Language Assistance Plan For Jump Around Carson (JAC)





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

## **Four Factor Analysis**

The Carson Area Metropolitan Planning Organization (CAMPO) has conducted this analysis to meet requirements under Title VI of the Civil Rights Act of 1964, which seeks to improve access to services for persons identified as Limited English Proficient (LEP). The purpose is to ensure that no person shall, on the basis of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

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

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

### **Factor 1, Step 1: Examine prior experiences with LEP individuals**

JAC serves a largely English-speaking community; however, Carson City has experienced growth in the Hispanic population over recent years. JAC transit operators and customer service representatives were surveyed in October 2022 about their interactions with LEP persons, and several respondents reported common interaction with persons speaking Spanish as their primary language. Operators also noted a few destinations frequented by LEP individuals.

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

### **Factor 1, Step 2: Become familiar with data from the U.S. Census**

As part of the FFY 2026 - 2028 Title VI update, the *2023 American Community Survey (ACS) Block Group 5-Year Estimates*, was used to obtain household language data for the Jump Around Carson Service Area. At the time of this report, the 2023 ACS was the most accurate population and housing data available.



## Factor 1, Step 2-A: Identify the geographic boundaries of the area that your agency serves

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

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

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

**Table 1.0 – Number of Households and Percent of Limited English Speaking Households within the JAC Service Area**

Total Service Area Households	23,652	100%
English Only	18,433	77.93%
Language other than English	5,219	22.07%
Limited English Speaking	526	2.22%
Spanish	4,159	17.58%
-Speak English less than "very well"	350	1.48%
Other Indo-European languages	435	1.84%
-Speak English less than "very well"	78	0.33%
Asian and Pacific Islander languages	514	2.17%
-Speak English less than "very well"	98	0.41%
Other languages	111	0.47%
-Speak English less than "very well"	0	0.00%

*\*Source: 2023 American Community Survey Block Group 5-Year Estimates*

## Factor 1, Step 2C: Analyze the data you have collected

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

- In the JAC Service Area, there are 23,652 households.
- 22.07% (5,219) of the total households speak a language other than English.
- After English, Spanish is the second most common language at 17.58% of the total households in the Service Area.
- 2.22% (526) of the households in the Service Area are identified as LEP



- Of the 526 of LEP Households:
  - 350 households (1.48% of total households) are Spanish speaking
  - 78 households (0.33% of total households) are Indo-European
  - 98 households (0.41% of total households) are Asian & Pacific Islander
  - 0 households (0.00% of total households) are other languages

### **Factor 1, Step 2D: Identify any concentrations of LEP persons within your Service Area**

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

### **Factor 1, Step 3: Consult state and local sources of data**

According to the Nevada Department of Education, during the 2024 – 2025 School year approximately 14% of public-school students in Nevada are considered English Learners (EL). Within Carson City, this measure is roughly 12% comprising approximately 1,000 students per year. The district reports that in addition to Spanish, Afrikaans, Arabic, Cambodian, Chinese, Czech, Farsi/Persian/Dari, Hindi, Korean, Malay, Polish, Punjabi, Russian, Tagalog/Filipino, Thai, Urdu and Vietnamese are all present within schools.

In a review of Nevada's statewide demographics, roughly 11% of residents, 5 years of age and older, are identified as LEP. This is compared to 21% in Carson City. Spanish-speaking LEP persons in Nevada comprise 62% of the total LEP population. This is compared to 82% of the total LEP population in Carson City.

### **Factor 1, Step 4: Identify, contact, and survey community organizations that serve LEP persons**

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

### **Factor 1, Step 4A: Identify community organizations**

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

- Carson City Health & Human Services
- Carson City School District
- Eagle Valley Middle School
- Empire Elementary School

- Friends In Service Helping (FISH)
- Neighborhood International Grocery Stores
- Mark Twain Elementary School
- Nevada Office of Minority Health
- Partnership Carson City
- Western Nevada College

### **Factor 1, Step 4B: Contact relevant community organizations**

In September 2022 each of these organizations were contacted with a request for information to help CAMPO improve language services provided. A sample of the survey is provided in Appendix C.

### **Factor 1, Step 4C: Analyze information**

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

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

### **Factor 2, Step 1: Review the relevant programs, activities, and services you provide**

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

### **Factor 2, Step 2: Review information obtained from community organizations**

**Partnership Carson City** interacts with LEP clients several times per day, and it is relatively common for them to be asked about public transportation. Two specific comments shared were 1) folks did not know how to use JAC, and 2) people felt nervous about trying JAC as non-residents. Partnership identified the Hot Springs Drive, Woodside Drive, and Nye Lane neighborhoods as key LEP communities. The agency staff recommended outreach at international grocery stores, smaller markets, churches, and elementary schools. They also

communicated that “boots on the ground” door to door outreach has proven effective. Specific recommendations included:

- Attend an ESL class at the Partnership office in order to speak with the LEP community in person.
- Attend elementary school events and speak with administrators and teachers.
- Meet with Partnership’s Hispanic Services Coordinator.

**Friends in Service Helping (FISH)** provides social services to low-income populations. FISH staff reported that they interact at least once daily with LEP individuals. They shared that although they do not receive many inquiries about JAC Transit specifically, their most effective outreach strategies include newsletters, social media posts, informational posts in English and Spanish in their office, as well as several annual fundraiser/meet and greet events.

**Carson City Health & Human Services** reported that it interacts with LEP (Spanish-speaking) folks on a daily basis. The agency suggested that many LEP folks reside in the Woodside Drive area. The agency believed the best way to obtain input from the LEP population was through brief surveys in their preferred language and through focus groups with interpretive services. In addition to social service agencies, the agency indicated the LEP community would be likely to trust churches in delivering language appropriate messages.

**Western Nevada College** is the local community college and home to the ACCEL College and Career Readiness Program and interacts with LEP individuals several times per day as such. They noted that LEP populations exist around Empire Elementary School, near the courthouse in Downtown, and in the neighboring town of Mound House. WNC staff advised that sharing information directly with community members is effective since knowledge sharing through word of mouth is prevalent within the different LEP communities. Additionally, placement of informational materials at international grocery stores and Walmart was suggested. WNC shared that they frequently have LEP students express transportation issues related to getting to/from class, and that their team shares maps and other resources to help students and families access transit.

### **Factor 2, Step 3: Consult directly with LEP persons**

CAMPO conducted a survey of LEP community members in November of 2022. Of the 10 survey responses received, 5 indicated that they were familiar with JAC fixed-route and/or paratransit service. Half of the respondents also indicated that they know how to find information on topics such as routes and schedule updates. The respondents who were familiar with the system were complimentary of it, and several suggestions were made as to how to communicate better with LEP people. Those included through email in Spanish, translated brochures and schedules, and phone calls with JAC updates. CAMPO will examine current procedures with consideration of this feedback.



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

### **Factor 3, Step 1: Identify your agency's most critical services**

Access to effective public transportation is important to LEP persons as indicated by interactions with community organizations that represent them and the November 2022 survey results. The most critical services for LEP persons are the JAC fixed route service and the JAC Assist ADA complementary paratransit service. These services provide a higher quality of life and mobility for LEP persons that may not have access to a vehicle.

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

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

### **Factor 3, Step 2: Review input from community organizations and LEP persons**

As demonstrated by the surveys of bus operators, community organizations, and LEP individuals, Spanish is the primary language of the majority of LEP people in Carson City. According to all sources, no significant barriers exist that prevent the Spanish-speaking community from obtaining information about or using the services of the JAC transit system. However, JAC will continue to invest and conduct outreach to inform and understand the needs of LEP persons.





## **Factor 4: The resources available to the recipient and costs**

### **Factor 4, Step 1: Inventory language assistance measures currently being provided, along with associated costs**

- Below is a list of language assistance measures, which are estimated to have a \$1,000 annual cost:
- JAC fixed route brochures with Spanish translation
- Critical information on JAC website translated into Spanish, with Google Translate feature provided throughout website
- Safety reminders and “how to ride” tips in bus translated into Spanish
- Application for Senior Bus Pass Program translated into Spanish
- Bilingual staff support at both the JAC Headquarters and Health and Human Services for Spanish-speaking persons to obtain basic transit information

### **Factor 4, Step 2: Determine what, if any, additional services are needed to provide meaningful access**

Based on the four-factor analysis, JAC should continue to focus on providing information regarding the Jump Around Carson bus services in Spanish and when possible, translate more additional information into Spanish. Since no Title VI complaints have been filed and no significant barriers for the Spanish-speaking community were identified through the rider survey nor the local organizations, no additional services are urgently needed.

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

- Printed transit planning information
- Additional website information
- Safety and security related announcements, online and through JAC’s current mobile phone application
- JAC Assist paratransit information
- Transit material in shelters and vehicles
- Information regarding future use of new technology, such as real-time departure information, next-stop announcements, and electronic signage

- On-demand translation services by telephone should be implemented to assist LEP persons when calling the operations office.

### **Factor 4, Step 3: Analyze your budget**

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

### **Factor 4, Step 4: Consider cost effective practices for providing language services**

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

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

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

## **Plan for Implementation**

### **Identifying LEP individuals who need language assistance**

Of the total number of households, 526 (2.2%) are persons with limited English proficiency. The largest non-English group is Spanish, which represents about 82% of the LEP population. Research among bus operators and customer service staff indicates the frequency of contact with LEP persons speaking Spanish is daily or almost daily.

### **Language assistance measures**

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

- Partnership Carson City

Hannah McDonald

1925 N. Carson Street, Carson City, NV 89706



Language assistance measures by medium and approach:

- Voice communication (over the phone or in person at the JAC Operations Office):
  - Utilize in-house resources if available.
  - Contact the organization noted above.
  - If the agency is not available or in the case of languages other than Spanish, staff should use an identified governmental resource from Factor 4 or enlist the services of a Language Line or a similar system.
- Written communication to the JAC Operations Office:
  - When written communication from an LEP person is received it shall be forwarded to CAMPO staff, who will in turn forward it to an available in-house resource or the organization noted above for assistance with the translation
- Assistance to a LEP person on a bus:
  - The bus operator will ask another passenger to interpret, or the driver could provide the phone number for customer service (775-841-7433) for interpretation assistance.
  - The bus operator can also direct the passenger to translated information, such as printed brochures

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

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

The competency of translation providers is continually assured. An in-house translator is currently available and has demonstrated the ability to provide accurate translation and is familiar with specialized terms and concepts associated with public transportation. The in-house translator understands that translation functions are limited to interpretation and

translation only, and that an interpreter/translator shall not deviate into other roles. The in-house translator has attested that there is no conflict of interest.

### **Training staff**

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

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

### **Providing notice to LEP persons**

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

### **Monitoring and Updating the Language Assistance Plan**

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

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

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

### **Appendices**

Appendix A – JAC Service Area

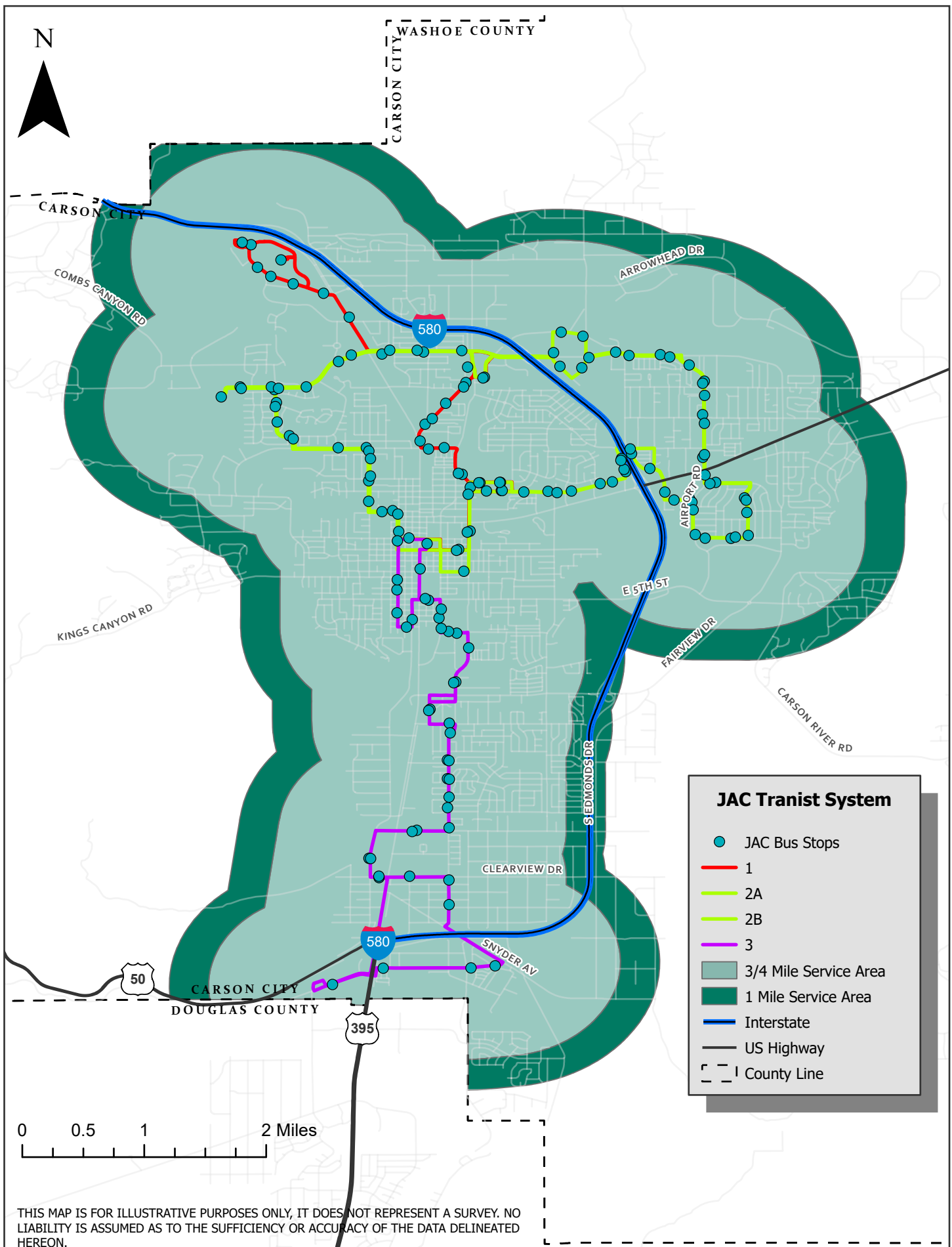


Appendix B (1-4) – Households with Limited English Proficiency by Language

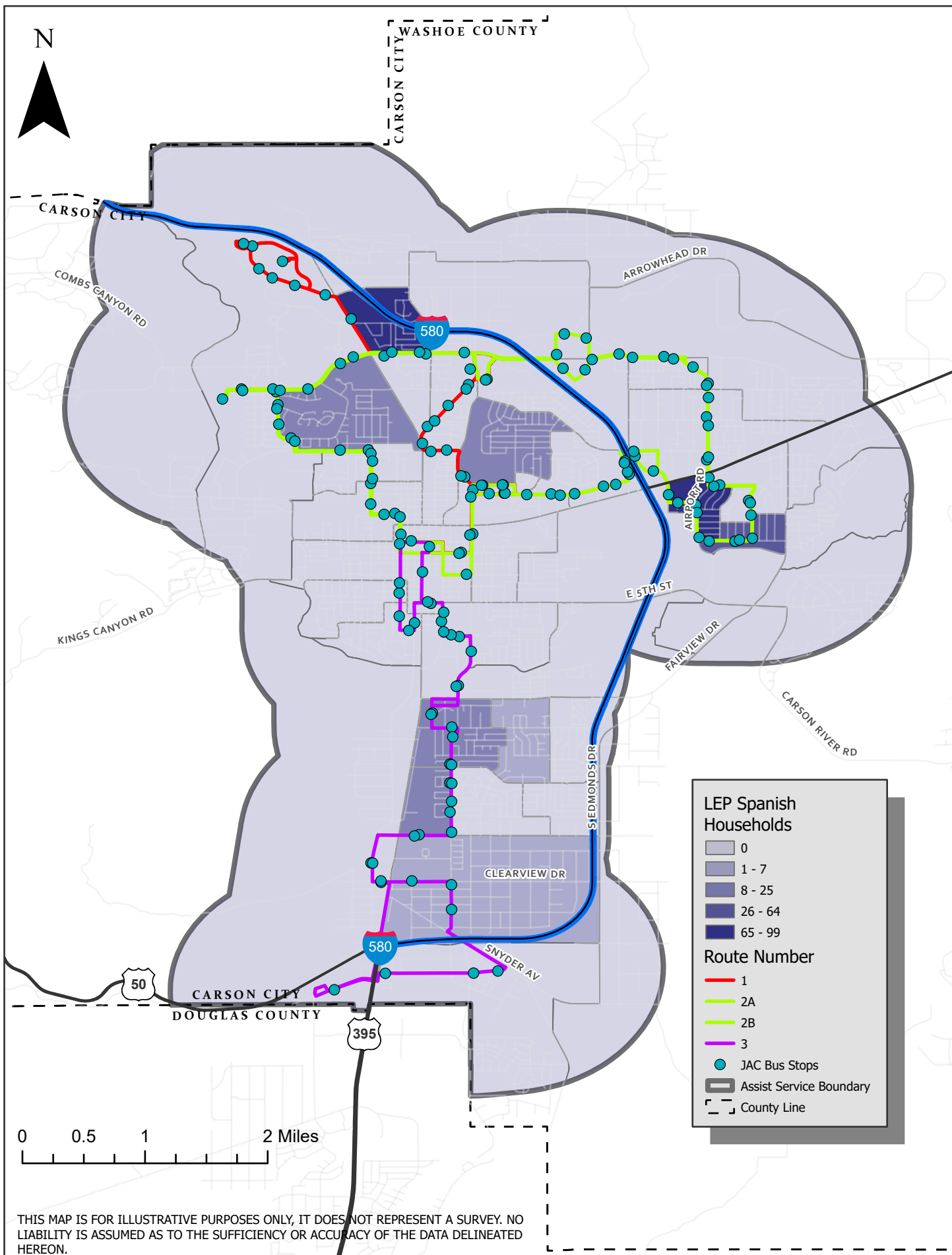
Appendix C – Survey of Community Organizations in Carson City



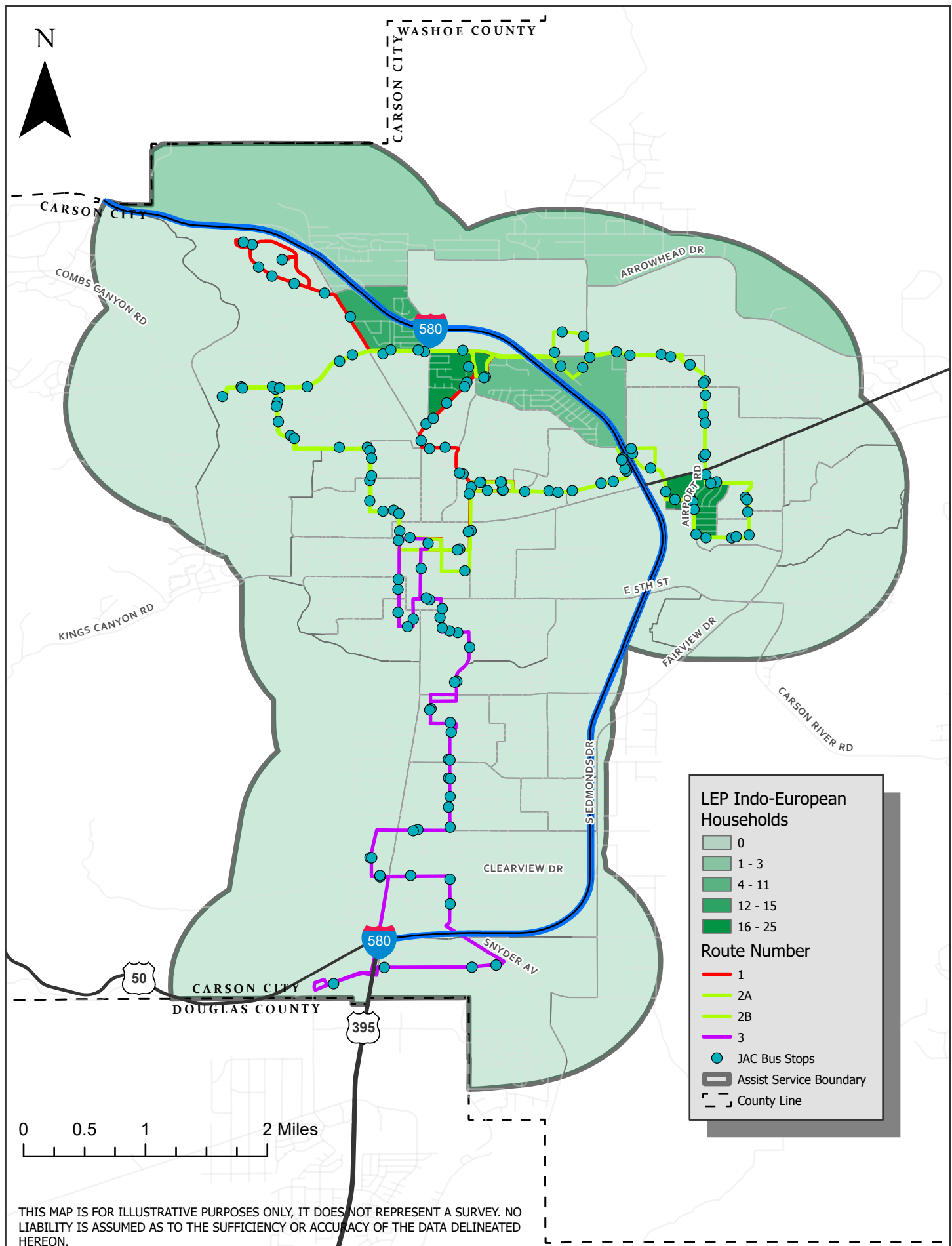
# Appendix A - JAC Service Area



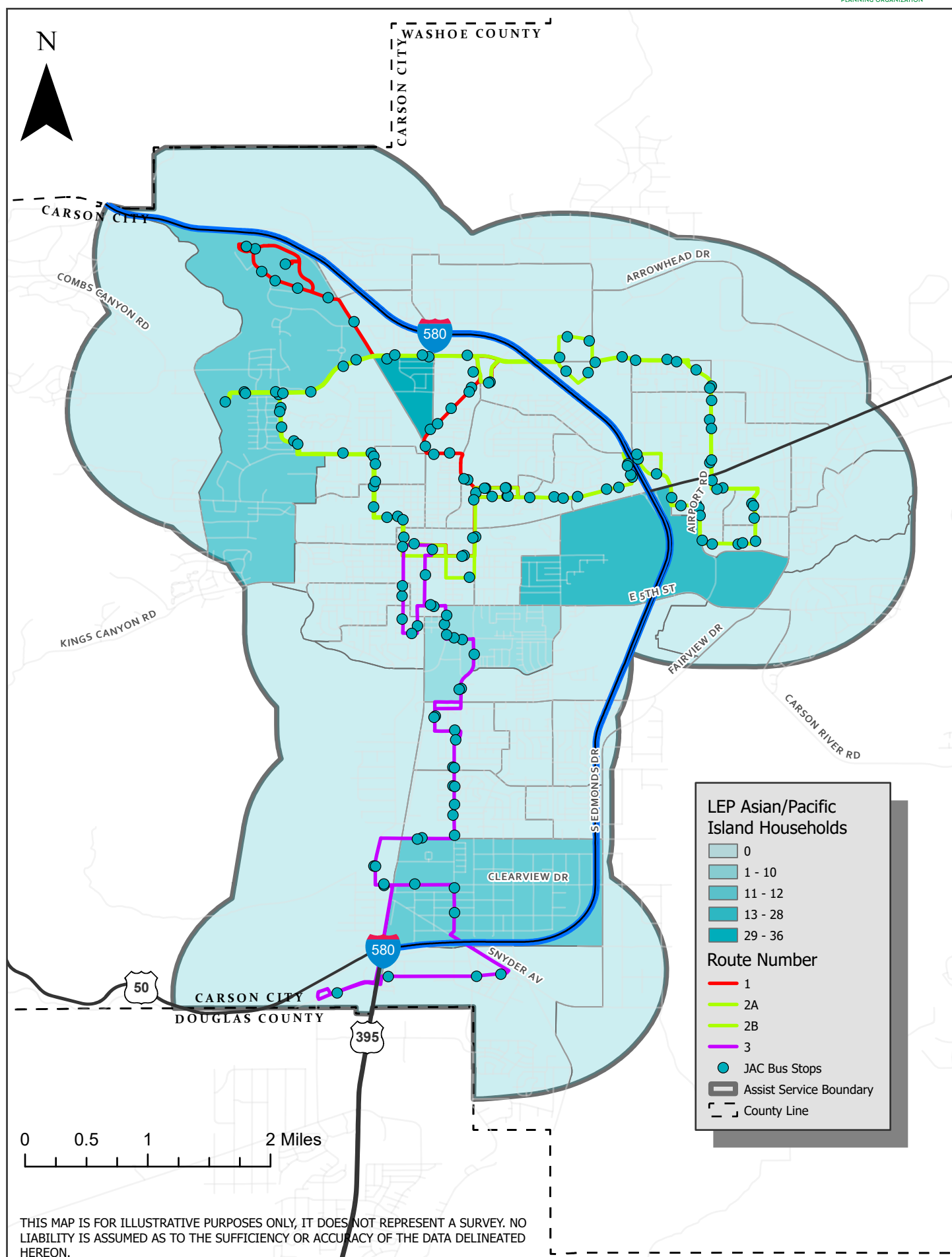
Appendix B-1: Spanish Households with Limited English Proficiency (LEP)

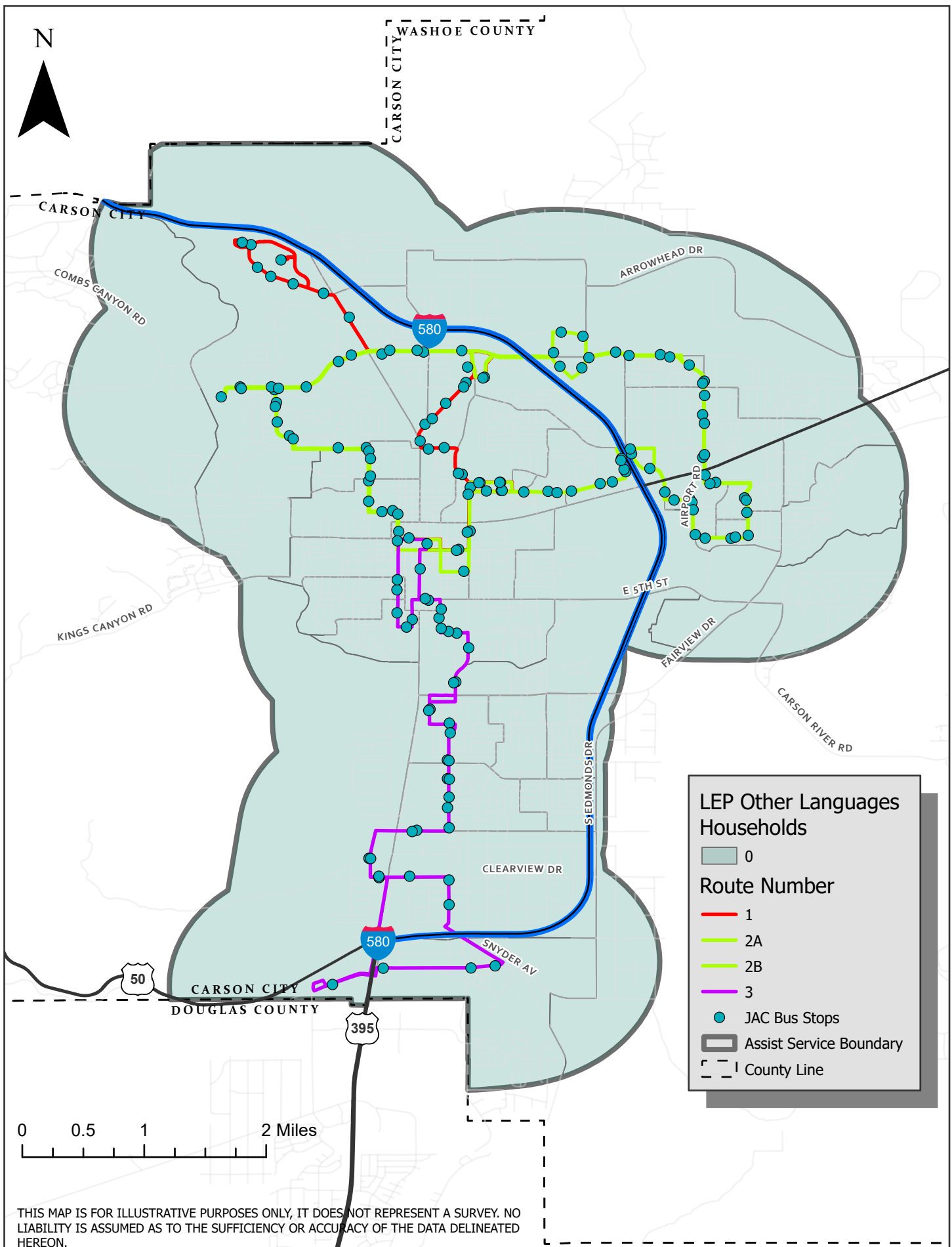


# Appendix B-2: Indo-European Households with Limited English Proficiency (LEP)











## Appendix C

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

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

1. What is the name of your organization?

---

2. As a part of your work, how often do you interact with individuals whose proficiency in English is limited?

- ☐ Several times per day  
☐ Once daily  
☐ Once per week

- ☐ Once per month  
☐ Rarely or never

3. In your experience, is there a particular area of Carson City where significant numbers of LEP populations reside?

- ☐ Yes ☐ No

If yes, where? 

---

4. In your experience, are there particular locations specific to LEP populations in Carson City that could be served by JAC Transit?

- ☐ Yes ☐ No

If yes, where? 

---

5. What is the best way to gather input from the LEP population on transit-related topics such as route adjustments, fare options, and other general announcements?

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6. What outreach strategies have worked well for you in effectively communicating your organization's message?

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7. Has the LEP population inquired about how to access public transportation or expressed a need for public transportation service?

- ☐ Yes ☐ No

If yes, please explain.

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8. Would your organization be interested in partnering with JAC Transit to help keep the community informed of updates regarding transit service?

- ☐ Yes ☐ No

If yes, please leave a contact name, along with a good phone number or email address.

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# Attachment D

## System-Wide Services, Standards & Policies





**Jump Around Carson (JAC)**

**System-Wide Service Standards**

**&**

**System-Wide Service Policies**



## **Purpose and Scope**

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

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

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

## **JAC System-Wide Service Standards**

### **Service Indicator Adoption and Monitoring**

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

### **System-Wide Service Standards**

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

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

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

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## 1. Vehicle Load

Vehicle load factor is described by the FTA, in Circular 4702.1B, as follows:

**Vehicle load can be expressed as the ratio of passengers to the total number of seats on a vehicle. For example, on a 40-seat bus, a vehicle load of 1.3 means all seats are filled and there are approximately 12 standees. A vehicle load standard is generally expressed in terms of peak and off-peak times.**

Vehicle Load is calculated by dividing the average peak passenger load on each route by the number of seats on the type of bus typically assigned to that route. JAC fixed routes utilize various bus sizes. JAC operates 35-foot ‘pusher’ style buses with a capacity of 32 seated passengers, 24-foot ‘cutaway’ style buses with a capacity of 17 seated passengers, and 28-foot ‘cutaway’ style buses with a capacity of 18 seated passengers. A vehicle load factor for each type has been established for buses dependent on vehicle length. Vehicle load factor for the ‘pusher’ buses has been set at 1.63, which means these buses would reach capacity once all 32 seats had been filled and there are 20 standees. Vehicle load factor for 24-foot ‘cutaway’ buses is set at 1.65 (17 seated passengers, 11 standees). Vehicle load for the 28-foot ‘cutaway’ buses has been set at 1.55 (18 seated passengers, 10 standees). The variance in standees is due to the differences in vehicle gross vehicle weight rating (GVWR).

For both peak and off-peak times, JAC will be aiming for reduced vehicle load factors on all bus types due to both safety concerns and rider comfort. Therefore, JAC’s goal vehicle load factors will be 1.31 for the 35-foot buses (32 seated passengers and 10 standees), 1.29 for the 24-foot cutaways (17 seated passengers and 5 standees), and 1.28 for the 28-foot cutaways (18 seated passengers and 5 standees).

## 2. Vehicle Headway

Vehicle headway is described by the FTA, in Circular 4702.1B, as follows:

**Vehicle headway is the amount of time between two vehicles traveling in the same direction on a given line or combination of lines. A shorter headway corresponds to more frequent service. Vehicle headways are measured in minutes (e.g., every 15 minutes). Headways and frequency of service are general indications of the level of service provided along a route. Vehicle headway is one component of the amount of travel time expended by a passenger to reach his/her destination. A vehicle headway standard is generally expressed for peak and off-peak service as an increment of time (e.g., peak: every 15 minutes; and off peak: every 30 minutes).**

The JAC fixed routes operate on one-hour headways. The routes repeat every hour and typically only one bus travels along each route per hour, although there are sections of roadways or particular bus stops that are serviced by multiple bus routes. The current service levels of the JAC system are sufficient to meet demand during peak and off-peak hours.

### 3. On-Time Performance

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

**On-time performance is a measure of runs completed as scheduled. This criterion must first define what is considered to be “on time.” For example, a transit provider may consider it acceptable if a vehicle completes a scheduled run between zero and five minutes late in comparison to the established schedule. On-time performance can be measured against route origins and destinations only, or against origins and destinations as well as specified time points along the route. Some transit providers set an on-time performance standard that prohibits vehicles from running early (i.e., ahead of schedule) while others allow vehicles to run early within a specified window of time (e.g., up to five minutes ahead of schedule). An acceptable level of performance must be defined (expressed as a percentage). The percentage of runs completed system-wide or on a particular route or line within the standard must be calculated and measured against the level of performance for the system. For example, a transit provider might define on-time performance as 95 percent of all runs system-wide or on a particular route or line completed within the allowed “on-time” window.**

JAC buses are determined to be on-time if it departs a scheduled “time point” between zero to five minutes later than the published time. Buses are considered early if they depart from a published time point prior to the scheduled departure. It is JAC’s goal to be on-time at least 85 percent of the time. JAC staff regularly monitors on-time performance and discussions with bus operators are used to identify vehicle scheduling issues which may be corrected through service changes.

#### 4. Service Availability

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

**Service Availability is a general measure of the distribution of routes within a transit provider's service area. For example, a transit provider might set a service standard to distribute routes such that a specified percentage of all residents in the service area are within a one-quarter mile walk of bus service or a one-half mile walk of rail service. A standard might also indicate the maximum distance between stops or stations. These measures related to coverage and stop/station distances might also vary by population density.**

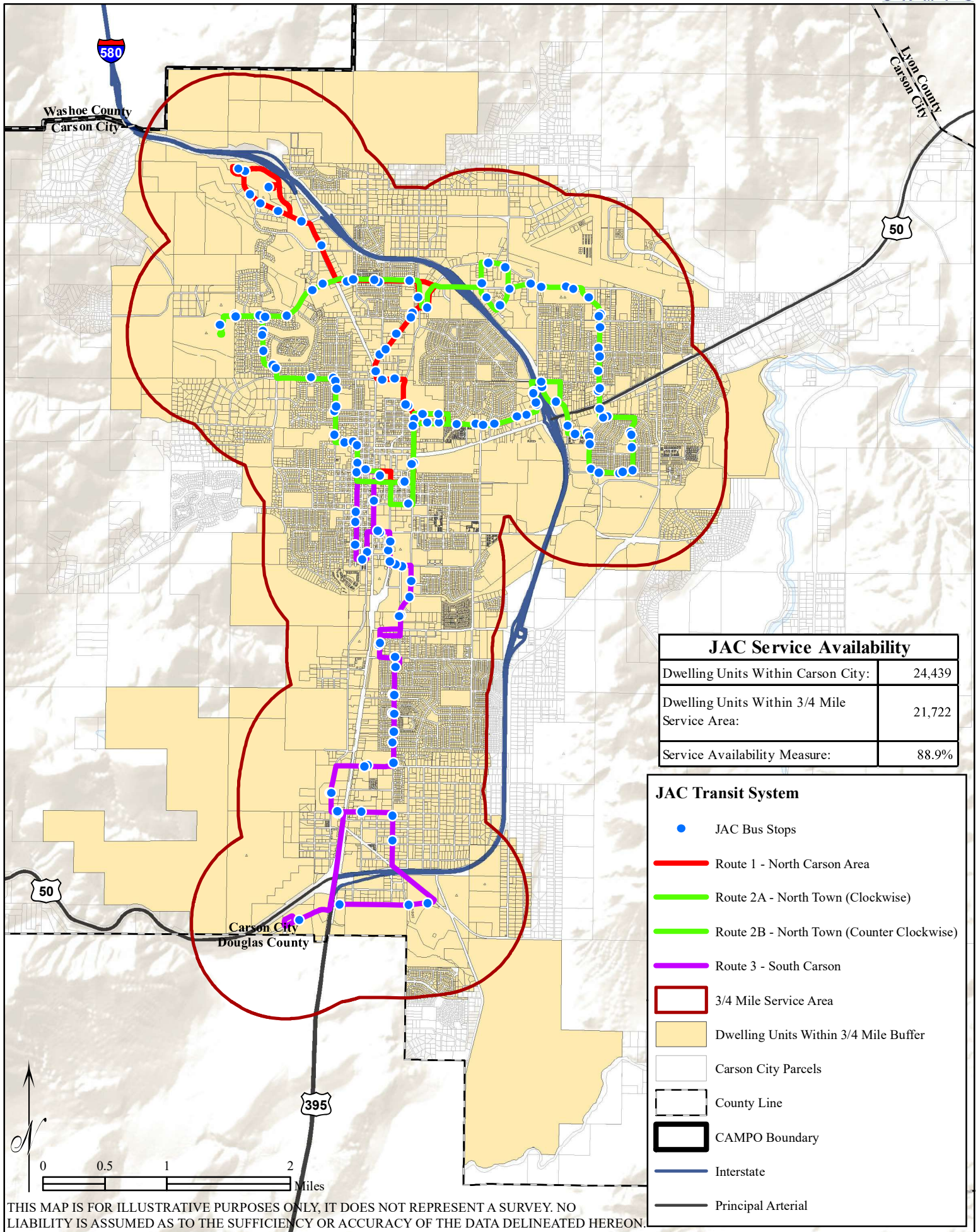
The goal for JAC's fixed route services is to provide bus service within three-quarter mile of 75 percent of the dwelling units within Carson City. The presence of JAC transit service is particularly strong in more densely populated low-income and minority parts of the Service Area.

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

This Service Availability measure demonstrates that 88.88% of the dwelling units within Carson City are located within the three-quarter mile buffer. Figure 1 provides a graphical representation of the Service Availability measure for JAC.



Figure 1 - Jump Around Carson (JAC) Transit System 2023 Service Availability Measure



## **JAC System-Wide Service Policies**

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

1. Distribution of Transit Amenities
2. Vehicle Assignment

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

### **1. Distribution of Transit Amenities**

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

**Transit amenities refer to items of comfort, convenience, and safety that are available to the general public. Fixed route transit providers must set a policy to ensure equitable distribution of transit amenities across the system. Transit providers may have different policies for the different modes of service that they provide. Policies in this area address how these amenities are distributed within a transit system, and the manner of their distribution determines whether transit users have equal access to these amenities. This...is not intended to impact funding decisions for transit amenities. Rather, this...applies after a transit provider has decided to fund an amenity.**

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

## 2. Vehicle Assignment

Vehicle assignment is described by the FTA, in Circular 4702.1B, as follows:

**Vehicle assignment refers to the process by which transit vehicles are placed into service in depots and on routes throughout the transit provider's system.**

There are two types of fixed route buses in the JAC system; pusher and cutaway. Pusher style buses have a capacity of 32 passengers, 24-foot cutaway buses have a capacity of 17 passengers and 28-foot cutaway buses have a capacity of 18 passengers. All buses are ADA compliant (with wheelchair ramp and securement area), and are equipped with two-way radio communications, air conditioning, bike racks, and video surveillance. Any fixed route bus in the fleet may be dispatched to any route in the system on any given day.



# Attachment E

## Subrecipient Compliance Assessment Tool



# Sub-Recipient Title VI



## Compliance Assessment Tool

In accordance with 49 CFR 21.9(b), and to ensure that subrecipients are complying with the USDOT Title VI regulations, primary recipients must monitor their subrecipients for compliance with the regulations. Importantly, if a subrecipient is not in compliance, with Title VI requirements, then the primary recipient is also not in compliance. Title VI of the Civil Rights Act of 1964 states that “no person in the United States shall be excluded from participation, denied the benefits of, or be subject to discrimination in any federally funded program, policy, or activity on the basis of race, color or national origin.”

CAMPO has developed this assessment tool as a means of determining sub-recipient compliance as well as to help sub-recipients understand their Title VI responsibilities.

This assessment acts as CAMPO’s sub-recipient monitoring system and has been designed to take only a few minutes of your time. Please email this completed form and attachments to Marcus Myers, Transit Coordinator at [mmyers@carson.org](mailto:mmyers@carson.org) no later than 10/1/2025, annually.

Questions or concerns may be e-mailed to [mmyers@carson.org](mailto:mmyers@carson.org) or you may reach out to Mr. Myers by phone at (775)283-7583.

### **Baseline Questionnaire**

1. What is the name of your Agency?
2. Please provide the Name, Title, and contact information for the person who completed this baseline assessment.
3. Who is the Title VI contact person for your agency? Does this person accept complaints from the public? If not, who does? Please include title, email and telephone number for each person listed.
4. In the past three years, has your agency been names in a discrimination complaint or lawsuit? If so, when and what was the nature of the complaint or lawsuit and the outcome?



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5. Does your agency have a written discrimination complaint policy? If so, please provide as an attachment.
  6. Has your agency made the public aware of the right to file a complaint? If so, by what mechanism? Please, provide as an attachment.
  7. Does your agency provide free translation services for persons with Limited English Proficiency? If so, please provide as an attachment.
  8. In the past twelve months, what has your agency done to receive and consider input from all citizen groups, especially minority, low income, disabled and transit-dependent? If so, please attach proof.
  9. Does your agency have a method to collect racial and ethnic data on citizens impacted by your projects? If so, please describe.
  10. Has your agency provided written Title VI assurances to the FTA? If so, please attach a copy.
  11. Does your agency include the required DBE assurance language at 49 CFR 26.13 (a) and (b) verbatim in all financial agreements, contracts and subcontracts? (Please see DBE assurance language on the next page)
  12. Do you have any questions regarding this assessment or Title VI?

**Thank you!**



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**§ 26.13 What assurances must recipients and contractors make?**

(a) Each financial assistance agreement you sign with a DOT operating administration (or a primary recipient) must include the following assurance:

The recipient shall not discriminate on the basis of race, color, national origin, or sex in the award and performance of any DOT-assisted contract or in the administration of its DBE program or the requirements of 49 CFR part 26. The recipient shall take all necessary and reasonable steps under 49 CFR part 26 to ensure nondiscrimination in the award and administration of DOT-assisted contracts. The recipient's DBE program, as required by 49 CFR part 26 and as approved by DOT, is incorporated by reference in this agreement. Implementation of this program is a legal obligation and failure to carry out its terms shall be treated as a violation of this agreement. Upon notification to the recipient of its failure to carry out its approved program, the Department may impose sanctions as provided for under part 26 and may, in appropriate cases, refer the matter for enforcement under 18 U.S.C. 1001 and/or the Program Fraud Civil Remedies Act of 1986 (31 U.S.C. 3801 *et seq.*).

(b) Each contract you sign with a contractor (and each subcontract the prime contractor signs with a subcontractor) must include the following assurance:

The contractor, sub recipient or subcontractor shall not discriminate on the basis of race, color, national origin, or sex in the performance of this contract. The contractor shall carry out applicable requirements of 49 CFR part 26 in the award and administration of DOT-assisted contracts. Failure by the contractor to carry out these requirements is a material breach of this contract, which may result in the termination of this contract or such other remedy as the recipient deems appropriate.

