



DIVERSIFIED SERVICES, INC

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

Diversified Services, Inc.

February 21st, 2024

(Plan expires February 21st, 2027)



Title VI Plan Table of Contents

Diversified Services, Inc.'s Title VI plan includes the following elements:

Table of Contents

Section 1: Title VI Plan Approval.....	3
Section 2: Title VI Policy Statement.....	4
Section 3: Title VI Notice to the Public	5
Section 4: Title VI Complaint Procedure.....	6
Section 5: Title VI Complaint Form	8
Section 6: List of Title VI Investigations, Complaints and Lawsuits	11
Section 7: Public Participation Plan	12
Section 8: Four Factor Analysis and LEP Data.....	15
Section 9: Language Assistance Plan	21
Section 10: Minority Representation Information	26
Section 11: Providing Assistance to and Monitoring Subrecipients.....	27
Section 12: Title VI Equity Analysis for Facility Acquisition	28
Section 13: Fixed Route Transit Providers Service Standards and Policies	29

Section 1: Title VI Plan Approval

Title VI Plan Adopted on: February 21st, 2024

Adopted by: Diversified Services, Inc. Board of
Governors

Signature(s):  2/21/2024

Approval:

Section 2: Title VI Policy Statement

Policy Statement

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

Section 3: Title VI Notice to the Public

Title VI Notice to the Public

Notifying the Public of Rights Under Title VI

Diversified Services, Inc.

- [Diversified Services, Inc.](#) 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 [Diversified Services, Inc.](#)
- For more information on Diversified Services, Inc., civil rights program or Title VI obligations, the procedures for, or to file a complaint, please contact:

Laurie Smith, Health & Safety/Training Manager (Title VI Coordinator)
307-532-5911 ext. 108

Email: laurie.smith@dsiwy.org;

Or visit our administrative office at

1138 West C Street, Torrington, WY 82240

For more information, visit www.dsiwy.org

- For transportation-related Title VI matters, a complaint may also be filed directly with WYDOT's Office of Civil Rights to: Title VI Coordinator, 5300 Bishop Blvd., Cheyenne, WY 8200; via phone: 307-777-4457; or email: DOT-civilrights@wyo.gov

or to

- Federal Transit Administration, Office of Civil Rights, Director
East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC, 20590.
 - If information is needed in another language, contact **307-532-5911**.
 - Si se necesita información en otro idioma, comuníquese con 307-532-5911.

Diversified Service Inc.'s, Notice to the Public is posted in the following locations:

1. In all our public transit vans
2. In our Administration Office Building
3. On our T&S Center Building Bulletin board.

Section 4: Title VI Complaint Procedure

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

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

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

A complaint must be filed with the [Diversified Services, Inc.](#) no later than 180 days after the following:

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

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

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

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

- ✓ A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed.
- ✓ A letter of finding (LOF) summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member, or other action will occur.

If the complainant wishes to appeal the decision it must direct the appeal back to the agency. The complainant has 45 days after receipt of the closure letter or the letter of finding to do

so. The appeal will be investigated and decided by a separate party than the Title VI Coordinator (or other official who issued the initial decision). The appeal process information can be initiated by writing a formal letter with complaint.

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

Laurie Smith, Health & Safety/Training Manager (Title VI Coordinator)
307-532-5911 ext. 108

Email: laurie.smith@dsiwy.org;
Or visit our administrative office at
1138 West C Street, Torrington, WY 82240

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

Or

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

If information is needed in another language, please contact **307-532-5911**
Si necesita información en otro idioma, por favor llame (307) 532-5911.

Section 5: Title VI Complaint Form

**Insert Agency Name
Title VI Complaint Form**

Section I:				
Name:				
Address:				
Telephone (Home):			Telephone (Work):	
E-Mail Address:				
Accessible Format Requirements?	Large Print		Audio Tape	
	TDD		Other	
Section II:				
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

Section III:

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

Title VI: Race Color National Origin

Other (specify): _____

Date of Alleged Discrimination (Month, Day, Year): _____

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

Section IV

Have you previously filed a Civil Rights related complaint with this agency?

Yes

No

Section V

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

Yes No

If yes, check all that apply:

Federal Agency: _____

Federal Court _____

State Court _____

State Agency _____

Local Agency _____

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

Name:

Title:

Agency:
Address:
Telephone:
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:

**Diversified Services, Inc.
Laurie Smith, Health & Safety Training Manger (Title VI Coordinator)
PO Box 1078 * 1138 West C Street
Torrington, WY 82240
307-532-5911 ext. 108
laurie.smith@dsiwy.org**

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

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

Check One:

- There have been no investigations, complaint and/or lawsuits filed against us since the last plan submission.
- There have been investigations, complaints and/or lawsuits filed against us. *See list below. Attach additional information as needed.*

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

Section 7: Public Participation Plan

Diversified Services, Inc.'s *Public Involvement Philosophy*

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

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

Diversified Services, Inc. embraces several specific goals:

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

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

Strategies and Desired Outcomes

To promote inclusive public participation, Diversified Services, Inc. will employ the following strategies, as appropriate (make these determinations based on a demographic analysis of the population(s) affected, type of plan, program and/or service under consideration, and the resources available):

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

In addition to these general strategies, Diversified Services, Inc. will employ these specific strategies or activities:

- Advertise Transportation on DSI’s Website
- Advertise Transportation on DSI’s Facebook
- Advertise Transportation in Spanish
- Post Flyers around Town in Spanish about Transportation

Public Outreach Activities

The public outreach and involvement activities conducted by Diversified Services, Inc. since the last Title VI Program submission are summarized in the table below.

Specific Public Participation activities are listed in the table below:

Event Date	Diversified Services, Inc. Staffer(s) or Department	Activity	Communication Method (Public notice, posters, social media)	Notes
1/24/2024	Julene Cook, CEO	Post	www.dsiwy.org	
1/24/2024	Julene Cook, CEO	Advertisement	flyer	

Section 8: Four Factor Analysis and LEP Data

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

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

Background

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

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

Framework for Deciding when Language Services are Needed

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

FOUR-FACTOR ANALYSIS

The Four Factor Analysis is a local assessment that considers:

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

Factor One: The number or proportion of LEP persons eligible to be serviced or likely to be encountered by Diversified Services, Inc.

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

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

Service Area Overview

Diversified Services, Inc. service area encompasses the City of Torrington located in Goshen County Home to 5,811 of 2022 population of service area people spread over 4.62 of square miles of all service areas totaled square miles, the service area's population speaks 4 of language groups in census data including Spanish and Russian, Polish or other Slavic languages. However, the overall numbers of residents who speak Spanish 'less than very

well' are very low at 0.53% of the population. A breakdown of the language groups, and those speaking English less than very well, are shown below.

Language Spoken at Home for the Population 5 Years and Over		
Torrington city, Wyoming		
Label	Estimate	Percent of Population
Total Population	5,811	100.00%
Speak only English	5,151	88.64%
Speak Spanish and English less than "very well"	31	0.53%
Speak French, Haitian, or Cajun and English less than "very well"	0	0.00%
Speak Germanic or other West Germanic languages and English less than "very well"	0	0.00%
Speak Russian, Polish or other Slavic languages and English less than "very well"	2	0.03%
Speak Other Indo-European and English less than "very well"	0	0.00%
Speak Korean and English less than "very well"	0	0.00%
Speak Chinese (incl. Mandarin, Cantonese) and English less than "very well"	0	0.00%
Speak Vietnamese and English less than "very well"	0	0.00%
Speak Tagalog (incl. Filipino) and English less than "very well"	0	0.00%
Speak Other Asian and Pacific Island languages and English less than "very well"	0	0.00%
Speak Arabic and English less than "very well"	0	0.00%
Speak Other and unspecified languages and English less than "very well"	0	0.00%

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

<https://api.census.gov/data/2022/acs/acs5>

The Safe Harbor Provision

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

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

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

The data above shows that just no language categories meets the Safe Harbor threshold. Torrington is home to 5,811 people and 0.57% of the total population speak English less than very well. The number of people who speak other languages and English less than very well include Spanish and Russian, Polish or other Slavic languages.

Designation of Vital Documents

Based on the limited population of Spanish speakers who also speak English less than very well, no languages meet the Safe Harbor Threshold in our service area. The agency is

therefore not designating any vital documents at this time. However, any unmet language needs will still be met as described in the Language Access Plan, below.

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

Diversified Services, Inc. recognizes the importance of taking measures to gauge LEP needs, but in the spirit of transparency, admits it has done less than planned in the past few years to fortify the Title VI Program. In this situation, our agency is doing all it can to move forward in a positive direction. This includes a plan to collect data on the frequency in which LEP persons come into contact with the agency's various departments and programs. The Title VI Coordinator will create an annual survey to be sent to each department. ("Departments" includes drivers, dispatch, central office, and administration office. Departments will collect data on their contacts with people who need language assistance, and the Title VI Coordinator will review and analyze this data each year. Departments will also be asked to log their use of any type of Language Line or any other translation or interpretation services. Thus, by the time this Program is due for an update, Diversified Services, Inc. will have concrete data on language access needs to help direct future efforts and planning.

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

Diversified Services, Inc. services likely affect every community member in some way. Our transit services are used daily by people who do not have access to their own transportation. Our services allow riders access to grocery stores, medical appointments, work, social service agencies, social activities, and a variety of other essential destinations. Some LEP persons are immigrants with no legal way to access a driver's license at this time.

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

Factor Four: Resources and Costs for LEP Outreach

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

Diversified Services, Inc. recognizes there will be times when professional interpretation or translation services are needed. In those cases, where a citizen needs to communicate with us in another language.

Finally, Diversified Services, Inc. will pay for document translation services when needed, which generally costs about \$25-\$35 per page.

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

Section 9: Language Assistance Plan

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

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

Diversified Services, Inc.'s Language Assistance Plan includes the following elements:

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

Four Factor Analysis Results: LEP Populations Served

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

Copy and paste your LEP description from the Four Factor Analysis, just before *Designation of Vital Documents* (the example part highlighted blue).

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

Diversified Services, Inc. has identified, developed, and uses the following:

- a) Diversified Services, Inc. has developed partnerships with local agencies, organizations, law enforcement, colleges/universities, local school districts and social service agencies that are available to assist with it LEP responsibilities.
- b) Any other need for translated documents or interpretation services will be provided on an as-needed basis. That is, anyone requesting specific information in a non-English language will be provided it upon request. The agency will use its internal resources to meet this need, when available. Otherwise, the agency will reach out to the network of resources it has developed, or hire a translator or interpreter as needed.

Item #3 – Description of how LEP Persons are Informed of the Availability of Language Assistance Service

In order to ensure that LEP individuals are aware of Diversified Services, Inc.'s language assistance measures, Diversified Services, Inc. provides the following:

- Title VI Program including the Language Assistance Plan is made available on website, if applicable, and hard copy in central office and administration office.
- Diversified Services, Inc. website includes language stating, "If you need assistance or information in another language, please contact (307) 532-5911." This message is provided in every language identified as meeting the safe harbor threshold, as well as all languages identified as representing at least 1% of the service area.

Item #4 – Description of how the Language Assistance Plan is Monitored and Updated

Diversified Services, Inc. will continue to update the LEP plan as required by U.S. DOT. At a minimum, the Title VI Plan will continue to be reviewed and updated every three (3) years in conjunction with the Title VI submission and use data from the U.S. Decennial Census or the American Community Survey as available, or when it is clear that the concentrations of LEP individuals are present in the Insert Agency Name service area.

Updates will continue to include the following:

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

Item #5 – Description of how Employees are Trained to Provide Language Assistance to LEP Persons

The following training will be provided to Insert Agency Name staff:

- Information on Diversified Services, Inc. Title VI Procedures and LEP responsibilities.

- Description of language assistance services offered to the public.
- Use of “I Speak” language cards (used to identify language preference).
- Documentation of language assistance requests.
- How to handle a potential Title VI / LEP complaint.

"I Speak" Language Identification Card

Note: For additional languages visit the US Census Bureau website

Mark this Box if you speak...	Language Identification Chart	Language
	Mark this box if you read or speak English	English
	Marque esta casilla si lee o habla español	Spanish
	Kos lub voj no yog koj paub twm thiab hais lus Hmoob	Hmong
	如果说中国在方框内打勾	Chinese
	Xin ñaùnh daáu vaø oâ naøy neáu quyù vò bieát ñoïc vaø noui ñoïc Vieät Ngöõ.	Vietnamese
	당신이한국어말할경우이 상자를표시	Korean
	Markahan itong kuwadrado kung kayo ay marunong magbasa o magsalita ng Tagalog.	Tagalog
	Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen	German
	Отметить этот флажок, если вы говорите по-русски	Russian
	Означите ову кућицу ако говорите српски	Serbian
	आप हिंदी बोलते हैं तो इस बक्से को चिह्नित करें	Hindi
	پر نشان لگائیں تو اس باکس بولتے ہیں اردو اگر آپ	Urdu

<http://www.lep.gov/ISpeakCards2004.pdf>

Log of LEP Encounters

Date	Time	Language Spoken By Individual <i>(if available)</i>	Name and Phone Number of Individual <i>(if available)</i>	Service Requested	Follow Up Required	Staff Member Providing Assistance	Notes

Section 10: Minority Representation Information

Recipients that have transit-related, non-elected planning boards, advisory councils or committees, or similar committees, *the membership of which is selected by the recipient*, must provide a table depicting the racial breakdown of the membership of those committees, and a description of efforts made to encourage the participation of minorities on such committees.

A. Diversified Services, Inc. does not have any transit-related, non-elected planning boards, advisory councils or committees, or similar committees, the membership of which is selected by the recipient. This section is inapplicable.

Section 11: Providing Assistance to and Monitoring Subrecipients

1. Does agency provide funding to subrecipients?

No, the agency does not have subrecipients.

Section 12: Title VI Equity Analysis for Facility Acquisition

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

- No, the agency has not built a facility.

- Yes, the agency has built a facility and completed a Title VI equity analysis to compare the equity impacts of various siting alternatives, and the analysis must occur before the selection of the preferred site. (Include at the end of the Title VI plan a copy of the Title VI equity analysis.)

Section 13: Fixed Route Transit Providers Service Standards and Policies

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

Diversified Services, Inc.:

is a fixed route transit provider

is **not** a fixed route transit provider

All Fixed Route Transit Providers must submit:

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

Transit Providers that operate 50 or more fixed route vehicles in peak service and are located in an Urbanized Area (UZA) of 200,000 or more people must submit:

1) Does the plan contain a demographic profile of the metropolitan area that includes identification of the locations of minority populations in the aggregate?	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N
2) A description of the procedures by which the mobility needs of minority populations are identified and considered within the planning process?	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N
3) Demographic maps that overlay the percent minority and non-minority populations as identified by Census or American Community Survey (ACS) data, at the Census tract or block group level, and charts that analyze the impacts of the distribution of State and Federal funds in the aggregate for public transportation purposes, including federal funds managed by the MPO as a designated recipient?	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N
4) Analysis of disparate impacts on the basis of race, color, or national origin, and, if so, determines whether there is a substantial legitimate justification for the policy that resulted in the disparate impacts, and	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N

<p>if there are alternatives that could be employed that would have a less discriminatory impact.</p>	
---	--

Diversified Services, Inc. has adopted the following system-wide standards and policies to ensure service design and operations practices do not result in discrimination on the basis of race, color, or national origin. Service policies differ from service standards in that they are not necessarily based on a quantitative threshold.

Service Standards

FTA requires that all fixed route transit providers develop quantitative standards for all fixed route modes of operation for the following indicators. Diversified Services, Inc. has prepared standards for all modes it operates including vans and buses.

a. Vehicle Load

Vehicle Type	Average Passenger Capacities			
	Seated	Standing	Total	Maximum Load Factor
Passenger Vans/Buses	12	0	12	1
Minivans	8	0	8	1
Regular Sized Vehicles	4	0	4	0

b. Vehicle Headway

POLICY HEADWAYS AND PERIODS OF OPERATION				
WEEKDAY	Peak	Base	Evening	Night
Cross-Town	15	15	--	--
<p><i>* Peak: 8:30 am-3:30 pm; Base 8:30 am-3:30 pm.; No transportation to public during nights or weekends.</i></p> <p><i>"--" means no service is provided during that time period.</i></p>				

c. On-Time Performance

A vehicle is considered on time if it departs a scheduled time point no more than one (1) minute early and no more than five (5) minutes late. Diversified Services, Inc. on-time performance objective is 90% or greater. Diversified Services, Inc. continuously monitors on-time performance and system results are published and posted as part of monthly performance reports covering all aspects of operations.

d. Service Availability

Diversified Services, Inc. will distribute transit service so that 90% of all residents in the service area are within a ¼ mile of our facility if we are available too and not transporting our own participants at our facility. We do NOT offer transportation on evenings or weekends. We ONLY provide transportation within the city limits of Torrington, Goshen County, Wyoming.

Service Policies

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

a. Vehicle Assignment

Vehicles will be assigned to our facility age of the fleet does not exceed "10" years. Our first priority is to transport the participants of our facility; public transportation is only provided if we are available too.