



University of Wyoming- Transportation Services

Title VI Program



Adoption Signature: Peke

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Date: 6/2/23

WYDOT LGC Office Review and Acceptance:

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Date: 6/5/23

TITLE VI PROGRAM QUESTIONNAIRE

The Federal Transit Administration (FTA) requires all grantees of FTA financial assistance to develop a Title VI Program. In the past, the Wyoming Department of Transportation (WYDOT) – Transit Division Title VI Program covered the State and its grantees. Now, each grantee must have its own program; this requirement applies to both Section 5310 and 5311 grantees.

To help the grantee develop a Title VI Program, WYDOT has developed this questionnaire, which will, once reviewed and accepted by WYDOT, become the agency's Title VI Program. Once accepted by WYDOT, submit the completed questionnaire to the agency's Board or council for approval and then provide evidence of the approval to WYDOT.

NOTICE TO THE PUBLIC

FTA requires that each grantee notify the public of its rights under Title VI and include the notice and where it is posted in the Title VI Program. The notice must include the following:

- A statement that the agency operates programs without regard to race, color, and national origin
- A description of the procedures that members of the public should follow in order to request additional information on the grantee's nondiscrimination obligations
- A description of the procedures that members of the public should follow in order to file a discrimination complaint against the grantee
- A statement that the agency's Title VI obligations and complaint procedures will be translated into other languages as needed

The notice can be a separate document, such as a posted sign, a statement that is in another document, or a stand-alone document, such as a Title VI brochure.

Attachment A presents two notices developed by WYDOT, a longer "stand-alone" statement and a shorter statement that can be included in another document, such as a bus schedule or as a placard in the bus. Both are provided in English and Spanish. Grantee can use these notices or develop its own. If grantee has developed its own notice, it must include the four items discussed above and be approved by WYDOT prior to posting.

At a minimum, a grantee must post a Title VI notice on its website and in the reception area and public meeting spaces of its offices, as well as all vehicles used for public transit. FTA recommends that each agency place the notice in other locations, such as on bus shelters, on schedules or other printed materials, and at stations.

WYDOT recommends placing the longer notice on the agency's website and in the required office areas in an inexpensive frame.

1. Is the grantee using either of WYDOT's notice(s) in Attachment A? If yes, which one(s)? If no, please provide a copy of your Title VI notice(s).

The University does not use the WYDOT notice(s) but the following modified version is posted on transportation vehicles and the reception area. A photo of the notice is attached as Appendix A. :

Notifying the Public of Rights under Title VI

WYDOT operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the 1964 Civil Rights Act. To find out more about our nondiscrimination obligations, to file a complaint, or to request this information in another language, please contact us at University of Wyoming, Office of Diversity and Employment Practices, Dept. 4307, 1000 E. University Ave., Laramie, WY 82072 (307) 766-3459.

Additionally, the University posts the following notice on the University of Wyoming Transit and Parking Services Website, <https://www.uwyo.edu/tps/transit/index.html>, a copy of which is attached as Appendix B. (*Please note that our website is currently in the middle of a software migration, so this url may change in the near future.)

The University is committed to equal opportunity for all persons in all facets of the University's operations and is an Equal Opportunity/Affirmative Action Employer. The University will provide all applicants for admissions, employment and all University employees with equal opportunity without regard to race, gender, religion, color, national origin, disability, age, protected veteran status, sexual orientation, gender identity, genetic information, creed, ancestry, political belief, or any other applicable protected category or participation in any protected activity. The University ensures non-discriminatory practices in all matters relating to its education programs and activities and extends the same non-discriminatory practices to recruiting, hiring, training, compensation, benefits, promotions, demotions, transfers, and all other terms and conditions of employment.

To obtain more information on the University of Wyoming's non-discrimination obligations or file a complaint, contact University of Wyoming, Office of Diversity and Employment Practices, Dept. 4307, 1000 E. University Ave., Laramie, WY 82072 (307) 766-3459. You may file a complaint no later than 180 calendar days after the date of the alleged discrimination.

2. Where are the notices posted?

In addition to the postings referenced in Question 1 above, University of Wyoming Regulations 4-1 and 4-2 encompass Title VI. (See University of Wyoming Regulation 4-1 and 4-2 attached as Appendix C.) These UW Regulations are posted in numerous physical and digital locations and University materials.

3. At a minimum, has the agency posted a Title VI notice on the agency's website, in the reception area of your office, and in the public meeting spaces of agency's office?

The Title VI notices are posted on the transportation vehicles, the University of Wyoming Transit and Parking Services Website, and the reception areas and public meeting spaces of UW TPS's office.

COMPLAINT INSTRUCTIONS AND FORM

FTA requires each grantee to have instructions for the public to follow and a form for the public to use for filing a Title VI complaint. Attachment B presents a form and instructions for filing a Title VI complaint in English and Spanish developed by WYDOT. Grantee can use the WYDOT form and instructions or use your own.

4. Has the grantee adopted the WYDOT-developed form and instructions for filing a Title VI complaint? If no, please attach a copy of the form and instructions that is used.

No, the University of Wyoming has its own procedure and process for filing a Title VI complaint. The process is detailed in the Standard Administrative Policy and Procedure, "Equal Opportunity, Harassment, and Nondiscrimination." This policy is comprehensive and covers all protected class harassment and discrimination. This policy is attached as Appendix D. Excerpts of the policy relevant to Title VI are attached as Appendix E.

The University of Wyoming form and instructions for filing a complaint is located at <http://www.uwyo.edu/reportit/index.html> and the Report It form is attached as Appendix F. The University also accepts a variety of reporting options, including receiving reports of discrimination and harassment verbally, via email, and the form, mentioned above, located in the reporting platform on the Equal Opportunity Report and Response website.

TITLE VI COMPLAINTS, INVESTIGATIONS AND LAWSUITS

FTA requires that the Title VI Program include a list of transit-related Title VI complaints, investigations, and lawsuits. WYDOT must be informed whenever there is a Title VI complaint. Please note that Equal Employment Opportunity (EEO) and Americans with Disabilities Act (ADA) complaints are not Title VI complaints so do not list them. If the agency is a part of a city, county, or human service agency, only list Title VI complaints, investigations, or lawsuits related to transit service.

5. Since submitting the last grant application to WYDOT, has the agency had any Title VI complaints, investigations, or lawsuits related to your Transit Program? If yes, please complete the following table.

Type	Date	Summary	Status	Action(s) Taken
Complaints	2/12/21	Interaction between two passengers about national origin which, based on the complaint, included microaggressions and insensitive questions.	Closed; no finding of a violation of UW policy	Internal assessment completed 4/21/21. Additional training for the department related to harassment and discrimination.
Investigations		None		
Lawsuits		None		

PUBLIC PARTICIPATION ELEMENT

FTA requires that the Title VI Program include a public participation plan that includes an outreach plan to engage minority and Limited English Proficient (LEP) populations. The plan may include other constituencies that are traditionally underserved, such as people with disabilities, low-income populations, and others. Applicants to WYDOT for FTA assistance are required to comply with several requirements that help meet this Title VI requirement. These requirements include the published notice of intent to apply to WYDOT for FTA assistance and participation in the public transit-human services transportation coordinated plan development. Other public participation methods include open Board/ council meetings, council meetings of cities and counties that provide local funding, transit/client advisory committees, public involvement efforts for Transit Development Plans (TDPs), passenger surveys, marketing efforts, such as booths at fairs, and presentations to service and other organizations.

The University of Wyoming has posted its intent to apply to WYDOT for FTA assistance on its website on June 5, 2023. This notice will be posted for at least 30 days (July 5, 2023).

6. Are Board/council meetings open to the public?

The University does not have a separate Board or Council for the University Transit and Parking Services department.

For this reason, Questions 7 through 11 are not applicable.

12. Does grantee rely on any counties or cities for funding? If yes, please describe how interested parties can comment on your budget and services at city and town council meetings.

No.

13. Discuss any other outreach efforts, including transit advisory committees, procedures for soliciting comments for fare increases and service changes, passenger surveys, public involvement for transit development plans, presentations, etc.

As an educational institution, public participation is a priority for the University of Wyoming's Transportation and Parking Services (UW TPS). The following is a selected list of public participation activities and strategies as informed by the Federal Transportation Administration (FTA) Circulars 4702.1B and 4703.1:

- Social media profiles including Facebook, Snapchat, and Twitter
- Robust website presence with informative materials, maps, updates on access and closures, and contact information (<https://www.uwyo.edu/tps/index.html>)
- Board of Trustees Meetings with Public Sessions, which are broadcast via WyoCast and YouTube (<http://www.uwyo.edu/trustees/2023-meeting-agendas-materials-and-minutes/>)
- Strategic Plan meetings with public response periods, surveys, and town halls. Town hall meetings were advertised in advance, broadcast via WyoCloud, and offered anonymous surveys and accommodations. There were town halls held in the past year on ADA and the Transportation Plan specifically. (<https://www.uwyo.edu/uw/news/2022/05/uw-transportation-services-announces-new-parking-plan-effective-this-fall.html>)
- Numerous offices around campus advertise and provide brochure materials on paratransit, transportation and parking services, and SafeRide (SafeRide is an on-call public transportation service that operates late nights and weekends to offer safe rides anywhere in Laramie city limits. Rides are fare-free and open to the public.) (<https://www.uwyo.edu/tps/transit/saferide.html>)
- UWYO SafeRide App
- UWYO Roundup TransLoc Bus Tracker App
- 2018 Transit and Parking Study (<http://www.uwyo.edu/tps/transit-and-parking-study/>) Passenger surveys were conducted and several public meetings were held in 2018 as part of this study.
- UW Paratransit Services (<https://www.uwyo.edu/tps/transit/paratransit.html#PT>) UW TPS has solicited feedback for major service changes and held public forums as required by ADA regulations involving changes with ADA Paratransit.

LIMITED ENGLISH PROFICIENCY (LEP) ELEMENT

FTA requires that the Title VI Program include a plan for providing language assistance to LEP persons. An LEP person is someone “who speaks English less than very well,” as per US Census Bureau designation. To document what languages are spoken by LEP persons and to help determine what language assistance efforts the grantee should undertake, FTA requires that the grantee analyze the following four factors:

- the number and proportion of LEP persons served or encountered in your service area
- the frequency with which LEP individuals come into contact with your transit service
- the nature and importance of your transit service
- the language assistance resources potentially available to assist LEP persons

By completing this questionnaire, the grantee will have completed the required four-factor analysis.

The primary source data on LEP populations is the U.S. Census. We have provided a table for each grantee to fill with Census data.

Table 1 2010 Census Numbers for LEP Persons Residing within the Service Area			
Population 5 Years and Over by Language Spoken at Home and Ability to Speak English	Albany County, WY	Total	Percentage of Population 5 Years and Older
Language other than English			
Speak English less than “very well”	10,279	10,279	1.9%
Spanish			
Speak English less than “very well”	7,924	7,924	1.5%
Other Indo-European			
Speak English less than “very well”	874	874	0.2%
Asian and Pacific Island			
Speak English less than “very well”	1,283	1,283	0.2%
All Other			
Speak English less than “very well”	198	198	0.0%

Survey staff members, including bus drivers, reservationists/dispatchers, customer service agents, and office personnel, to determine the frequency of contact with LEP persons, what languages are spoken by these persons, and the languages they speak and/or understand. Attachment C presents a sample survey form. After conducting the survey, please complete the following table. (All 5311 providers need to complete the survey. 5310 providers not conducting the survey should not complete the table and answer question 14.)

Table 2 Frequency of Contact with LEP Persons	
Frequency	Languages Spoken by LEP Persons
Daily	
Weekly	
Monthly	Each transportation driver has approximately 6 encounters each month with LEP passengers. With ten drivers out at a time during the academic year, this is approximately 60 interactions a month. The languages reported by drivers are (in order of frequency): Chinese, Arabic, Hindi, Somali, Japanese, Korean, Pashtun, and German.
Less frequently than monthly	
<p>* UW TPS has not received any request for non-English language accommodations or resources. ** The LEP plan discussed below, in Question 14, will include surveys regarding non-English language needs within UW's transportation systems and programs.</p>	

14. If grantee has not completed Table 2, discuss the frequency of contact with LEP persons and the languages spoken by these persons. (5310 only)

The University of Wyoming is currently in the process of drafting a new institution wide LEP plan. This plan includes a four-factor assessment and surveys, notice and plan distribution, and implementation of key LEP services. This plan is scheduled to be drafted by mid-August 2023; UW will provide WYDOT with a copy of the finalized draft. (For additional questions regarding the LEP Plan, please contact Vice

President of Diversity, Equity, and Inclusion: Office of Diversity, Equity, and Inclusion Old Main 408 Laramie, WY 82071, Phone: 307-766-6672, Email: diversity@uwyo.edu)

The University of Wyoming's LEP surveys will aim to assess limited English proficiency needs throughout the institution, but they will also inform implementation of LEP resources for the transportation, parking, SafeRide, and Paratransit systems.

15. Provide a description of your service (type, days and hours) and list the major activity centers served (communities, employers, park and ride lots, government and human service agencies, medical facilities, shopping centers, and recreational facilities).

The University of Wyoming currently offers three different fixed route shuttles (UWYO Roundup) utilizing ten buses. Two routes are Express Park and Ride services that offer service to and from the east and south ends of campus Monday-Friday 6:30am – 6:30pm every 10 minutes. The Link route offers frequent circulator service to major classroom hubs, on-campus housing and off-campus shopping and community destinations. The Link operates Monday-Friday 6:30am – 6:30pm every 20 minutes during the academic year (every 30 minutes during summer). The Link stops at several major activity centers including Wal-Mart, Downtown Laramie, the University of Wyoming, Laramie County Community College, UW Plaza, and housing centers.

The University of Wyoming operates three full-time Paratransit demand response vehicles that serve the entire city limits of Laramie. All vehicles are ADA accessible, and all drivers are TSI certified. UW offers premium service for passengers outside of ¼ mile radius as well as same-day add-on rides.

The University of Wyoming offers SafeRide service seven days a week during the academic year and runs three days a week during the summer. SafeRide starts running at 10:00pm and runs until 2:00am. SafeRide operates within Laramie city limits and is open to the general public.

16. Discuss trip purpose from passenger surveys or transit development plans, if conducted.

N/A

Questions 17 through 26 will be covered by LEP plan surveys and implementation. Please refer to Question 14 for more information.

PLANNING AND ADVISORY BOARDS

FTA requires that the Title VI Program present the racial make-up of all transit-related, non-elected planning boards, advisory councils or committees, or similar committees, the membership of which is selected by the recipient, and a description of the efforts to encourage the participation of minorities on such committees.

27. List all transit-related advisory boards and committees and the purpose of each.

UW TPS does not have any separate advisory boards or committees.

For this reason, Questions 28 through 30 are not applicable.

SUBGRANTEES

FTA requires the Title VI Program to include procedures for monitoring subgrantees for compliance with Title VI.

31. Does grantee provide any FTA funds to any other transit-related agency? If yes, this is a subgrantee. Please list them. How does the agency monitor subgrantees for compliance with Title VI?

No, UW TPS does not have any subgrantees.

FACILITY LOCATION EQUITY ANALYSIS

FTA requires the Title VI Program to include procedures for ensuring an equity analysis of facility locations is conducted during the planning for a construction of a new facility. The WYDOT Transit Division ensures compliance with this requirement when providing FTA funding for a new facility.

Construction on the current UW Transit Maintenance and Storage Facility was completed in 2022. This facility was constructed in compliance with Title VI and National Environmental Policy Act (NEPA) requirements, including components of an equity analysis to ensure that the construction of the facility, and the facility itself, did not adversely impact minority communities and low-income communities through discriminatory or environmental effects.

An EPA Environmental Justice Screening in 2020 found that in the .15 mile radius around the facility, there are 36 residents. 23% of the residents are minorities and 43% are considered low-income. According to data for Laramie, WY 18% of the population are minorities and 42% are considered low-income. Any environmental effects, which are limited to minor noise and construction impacts, would not have a disparate impact on minority or lower-income populations. The 2020 Environmental Justice reports are attached in Appendices G, H, and I.

FIXED-ROUTE SYSTEMWIDE SERVICE STANDARDS

The remaining questions only apply to operators of fixed-route service. Grantees that only provide demand-response service can stop here. Please note that all 5310-provided service and route deviation service are considered demand-response service for the purposes of Title VI.

FTA requires operators of fixed-route service to set system wide service standards for each fixed-route mode of service provided and include the standards in the Title VI Program. The service standards must address vehicle loads, headways, on-time performance, and service availability.

31. What types of fixed-route bus service does grantee provide (local, express, commuter)?

Express and Commuter

Vehicle Load (Capacity) Standards

32. Has grantee adopted vehicle capacity standards? If yes, what are they?

Safe capacity limits are decided on by individual vehicle to ensure safe seating and standing room areas. Capacity is marked by the door on all buses.

33. Does grantee allow standees on buses for each type of service provided? If no, please explain.

Yes, standees are allowed on buses provided there is a safe aisle with adequate room equipped with hand pulls

34. Does grantee allow standees on buses for at all times of the day (peak and off-peak)?

Yes, allowed at all times.

35. Has grantee adopted the manufacturers' capacity standards for seated and standing passengers?

Yes.

36. Does grantee regularly have standees on buses? If yes, does grantee have plans to increase the amount of service to reduce the number of standees?

There are several times a day when the University of Wyoming has standing-room only on the Express route. These peak times have been identified and "overflow" buses are scheduled to run during these times to supplement the increased demand. Running additional buses during peak times has reduced the number of standing passengers.

Vehicle Headway Standards

37. Has grantee adopted vehicle headway standards? If yes, what are they?

University of Wyoming's headway standards are fairly simple, headways are simply kept to less than 30 minutes.

38. What are the headways for each type of fixed-route service?

Express headway is 10 minutes. Link headway is 20 minutes.

39. Are the headways the same for peak and off-peak hours? If no, discuss the differences.

Yes, headways remain the same during off-peak and peak. The difference during peak is that overflow buses will follow in right behind a bus that is full.

40. What are the headways for evening service?

Evening route service has 10-minute headways.

41. What are the headways for Saturday and Sunday service?

No fixed route service on weekends.

42. How has grantee set the headways?

Headways have been set to accommodate acceptable service levels at the University of Wyoming and the City of Laramie. Headways are also set to fit within the annual budget.

On-time Performance Standards

43. What is the on-time performance standard(s)?

95% on-time performance

44. Has grantee set a system wide goal for on-time performance? If yes, what is the goal?

Goal of 95% on-time performance

45. Does grantee have problems with on-time performance?

Typically, no. During adverse weather events, on-time performance will decrease.

Service Availability Standards

46. What criteria are used to decide where to locate local fixed-route service?

The criteria used to decide fixed-route services include components of an equity analysis to ensure no discriminatory or disparate impact results from the designated locations. The University also considers factors such as access to sidewalks, crosswalks, demand, sufficient queuing space and waiting areas, bus shelters, and ADA accessibility (including landing pads and curb height). These criteria are used in conjunction with the high traffic areas of the University of Wyoming including Student Union, Classroom Building, student apartments, the large parking lots suitable for park-and-ride operations, and popular shopping and commerce destinations throughout the Grand Avenue corridor.

47. Does grantee provide general public demand responsive service in areas service by fixed routes? If no, how far from the fixed-routes does grantee provide general public demand-response service?

Yes, ADA demand-response services complement fixed route operations and other demand-response services run outside of fixed-route hours throughout the City of Laramie limits.

48. Discuss spacing of bus stops, if used.

As discussed in Question 46, the fixed-route services are based on a variety of criteria to balance demand, accessibility, equity, and safety. The spacing of bus stops within each fixed-route is based on efficient utilization of transportation resources, reasonable duration headway, accessibility to campus facilities and local businesses, and local traffic and road infrastructure. Discuss grantee policy regarding activity centers served (employers, shopping centers, hospitals, clinics, senior housing centers, Rail Runner stations, city halls, etc.)

UW TPS local stops, those outside of the UW campus system, are designed to serve the UW community by providing safe transportation to important local resources including grocery stores, community colleges, apartment complexes, daycare facilities, and historic downtown. Each of these locations have stops with consideration for safety, local traffic, and community support.

FIXED-ROUTE SYSTEM-WIDE POLICIES

FTA requires operators of fixed-route service to set system wide policies for each fixed-route mode of service provided and include the policies in the Title VI Program. The policies must address distribution of service amenities, such as passenger shelters, and the assignment of buses to garages and routes.

49. Describe the passenger amenities, such as passenger shelters, benches, and waste receptacles and where are they located?

10 of 11 bus stops on the Express route have shelters, benches, and waste receptacles. 4 of the 12 bus stops on the Link route have shelters, benches, and waste receptacles. Other stops are typically in close proximity to a building or local business.

50. How does grantee determine where to place each type of passenger amenity?

Passenger amenities are typically chosen according to ridership at that particular stop and financial feasibility.

51. How does grantee distribute route and schedule information?

Route and schedule information is available on a website. An app is also available that has schedules, maps, and live bus locations. Paper schedules are available at several places on campus and other locations where buses stop. Schedules are also available at the Chamber of Commerce.

52. What kind of route and schedule information, if any, is provided at bus stops?

Typically, maps are provided at bus stops on routes with headways of 10 minutes or less. With routes that have greater than 10 minute headways, schedules will be posted at bus stops and online.

53. Discuss implementation or plans for electronic/passenger information for bus departures and arrivals, if any.

Electronic passenger information has been deployed on two different apps. TransLoc Rider (by TransLoc) for fixed-route and UWYO SafeRide (by VIA Mobility) for demand-response operations.

54. Discuss the number of bus garages/storage locations, how buses are allocated to the different locations? If only one location, respond "N/A".

N/A; UW only has one location.

55. How are buses assigned to routes?

Buses are assigned to routes according to equipment capacity and route demand. (I.e., larger buses are assigned to routes with high ridership, and smaller buses are assigned to routes such as Link where ridership is lower.)