

Montezuma County Public Transportation

ADA Demand Response Compliance Plan

Submitted By: MCDSS
109 West Main St, Ste 170
Cortez, CO 81321

Adopted by Montezuma County Board of County Commissioners

Chair: _____

Date: _____

Approved by: Colorado Department of Transportation
4201 East Arkansas Avenue
Denver, CO

By: _____

Date: _____

Table of Contents

1. General Contact Information.....	1
2. General Public Service Information.....	2
Service Area	
Scheduling	
Fares	
Reservation Process	
Fleet Inventory and Accessibility	
3. Reservation Process.....	3
4. Passenger Responsibilities	3
5. Fleet Inventory and Accessibility	3
6. General Service.....	4
7. Service Animal Policy	4
8. Personal Care Attendant Policy	4
9. Complaint Process	5
10. Driver Training	6
11. Driver Responsibilities	6
12. Transporting of Wheelchairs	6
13. Wheelchair Securement	7
14. Maintenance Training	7
15. Paratransit Service	7
16. Eligibility Process for Paratransit	8
17. Reasonable Modification Policy	8
18. Customer Information Availability & Accessibility	9
19. Public Participation/LEP Plan.....	9

1. General Contact Information

Agency Name:

Montezuma County Public Transportation

Mailing Address:

1700 North Dolores Rd., Cortez, CO 81321

Physical address:

1680 North Dolores Rd., Cortez, CO 81321

Telephone:

970-564-2773

Fax:

970-565-0443

Website:

montezumacounty.org

ADA Coordinator:

Kelli Hargraves

2. General Public Service Information

Montezuma County Public Transportation (MOCO) provides Demand Response for Montezuma County and surrounding area.

Service Area

Our Service Area is Montezuma County which includes Cortez, Dolores, Mancos, Towaoc and surrounding areas.

Scheduling

Service will be provided five days a week, Monday through Friday, from 8:00 am to 5:00 pm and for pre-scheduled requests. We ask that the rider call 24 hours in advance of their desired trip for a reservation.

Fares

Fares are collected on a cash basis and exact change is preferred. The table below reflects the fares charged for our general public service.

	Fare
Local Miles	
1-2 miles	\$3.00
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6-7 Miles	\$5.00
8-12 Miles	\$6.00
13-17 Miles	\$10.00
18-22 Miles	\$15.00
23-27 Miles	\$20.00
Round Trips:	
Cortez or Durango	\$100.00
Cortez to Farmington	\$200.00
Cortez to Dove Creek	\$75.00

For seniors (those 60 and older) transportation is provided through a suggested donation policy. Suggested donations are equivalent to the public fare schedule. Services for seniors will not be denied due to a rider's inability or unwillingness to contribute toward the cost of the service.

MOCO is also a Medicaid approved provider. Customers on Medicaid and those approved for medical of Home Community Based Services ride for free and we bill Medicaid for those rides.

3. Reservation Process

Our normal hours of operation are 8:00 AM to 5:00 PM, Monday through Friday and pre-scheduled rides. Telephone reservations are accepted 8:00 AM to 4:00 PM, Monday through Friday. Reservations are to be made at least 24 hours in advance of the trip. We strongly discourage same-day requests as accommodation of trip may not be possible; however, we will do our best to accommodate same-day transportation.

4. Passenger Responsibilities

All passengers must be able to sit in a bus seat or wheelchair in order to be transported.

All passengers on the vehicle are required to wear seat belts to include lap and shoulder belts. Therefore, persons in wheelchairs will also be required to be secured. Persons who, for medical reasons, are unable to wear a safety belt may request exemptions. To apply for this exemption a written verification from their physician attesting to the need for the exemption will be required.

MOCO will deny service to any individual who engages in violent, illegal conduct.

If a passenger's physical condition or conduct is hazardous, or whose behavior is seriously disruptive and/or a direct threat to others, service will be denied.

The passenger will be notified of his/her right to appeal the denial of service and MOCO Director will hear the appeal as soon as reasonably possible.

5. Fleet Inventory and Accessibility

MOCO operates wheelchair accessible buses.

Transportation will be provided in the most integrated setting appropriate to the needs of the individual with disabilities and will be equivalent to the service provided other individuals with respect to:

Comparable response time; Fares; Geographic area of service; Hours and days of service; Service Area; and Trip Constraints when accessible vehicles are required

6. General Service

MOCO provides demand response rural public transportation and provides equivalent service to individuals with disabilities, which is consistent with DOT ADA 49 CFR Part 37.77. In addition, MOCO ensures that all transportation personnel are trained to proficiency, as appropriate to their duties, so that they operate vehicles and equipment safely and properly assist and treat individuals with disabilities who use the service.

7. Service Animal Policy

MOCO shall permit service animals to accompany individuals with disabilities in vehicles and facilities. Under the Americans with Disabilities Act of 1990, a service animal is defined as “any guide dog, signal dog, or other animal that is individually trained to do work or perform tasks for an individual with a disability, including, but not limited to, alerting individuals with impaired hearing to intruders or sounds, providing minimal protection or rescue work, pulling a wheelchair, or fetching dropped items. 49CFR37.3

Control of the service animal is the responsibility of the animals’ partner. Any animal out of control will not be transported. If an animal’s behavior creates a hazard or direct threat, the accountability for damages or injuries shall remain with the person responsible for the animal.

Service animals should sit or lie on the floor. Animals should not occupy a passenger seat, and should not block the passenger aisle.

8. Personal Care Attendant Policy

Personal Care Attendants (PCA’s) are not required. If a PCA accompanies a passenger, the PCA will ride free of charge.

A companion (e.g., friend or family member) is not considered a personal care attendant unless the eligible individual regularly makes use of a personal care attendant and the companion is actually acting in that capacity.

During the reservation process, an individual must indicate whether he/she will be traveling with a personal care attendant. If someone does not indicate the use of an attendant, then any individual accompanying him/her would be regarded as a companion.

9. Complaint Process

In compliance with the U.S. Department of Transportation Americans with Disabilities Act (ADA) of 1990 (49 CFR Parts 27, 37, 38 and 39), and Section 504 of the Rehabilitation Act of 1973, as amended, MOCO ensures its services, vehicles, and facilities are accessible to and usable by individuals with disabilities. Anyone who believes he or she has been discriminated against on the basis of disability, including those denied a Reasonable Modification request, may file an ADA complaint.

Complaints may be submitted by filing an ADA Complaint Form, which can be found on our website at montezumacounty.org or by calling 970-564-4105.

If the complainant is unable to write a complaint, a representative may file on his or her behalf, or MOCO staff will provide assistance. Complaints must be filed within 180 calendar days of the alleged incident.

The ADA Coordinator or other qualified staff will contact the complainant within 15 business days of receipt of complaint. Any requested information must be received within 10 days of the request. If the Complainant does not respond to the request for information, the Complaint may be administratively closed.

MOCO will begin the investigation within 15 business days of receipt of complaint.

An investigation into the complaint will be conducted and documented to determine whether MOCO failed to comply with ADA regulations.

MOCO will complete the investigation within 60 calendar days of receipt of complaint. If additional time is needed for the investigation, the complainant will be notified.

MOCO will promptly communicate its response to the complainant, including its reasons for the response. The complainant will have 30 days from receipt of MOCO response to file an appeal. If no appeal is filed, the complaint will be closed.

Any appeal will be heard by a separate person or committee than who made the original decision. An appeal may be filed in written form and submitted by mail to MOCO, 109 W Main St, Ste. 170 Cortez, CO 81321, in person at the same location or by calling the ADA Coordinator at 970-564-4105.

10. Driver Training

MOCO shall ensure that personnel are trained to proficiency, as appropriate to their duties, so that they operate vehicles and equipment safely and properly assist and treat individuals with disabilities who use the service in a respectful and courteous way, with appropriate attention to the differences among individuals with disabilities.

Training will include a Passenger Assistance Safety & Sensitivity (PASS) Driver Certification Program which ensures that drivers have current expertise in passenger assistance techniques and sensitivity skills appropriate for serving persons with disabilities.

11. Driver Responsibilities

Drivers are responsible for loading and unloading passengers.

Drivers are not permitted to maneuver a wheelchair up or down more than one step. This rule is provided for the safety of the passenger and the driver.

Drivers are not permitted to lift passengers.

Drivers will help passengers take lightweight items off the vehicle and set them on the curb. If additional assistance is required, this assistance may be rendered on a case-by-case basis.

12. Transporting of Wheelchairs

MOCO will accommodate mobility devices. Two or more wheeled devices, usable indoors, designed or modified for and used by individuals with mobility impairments, whether operated manually or powered, will be accommodated as long as the lift can accommodate the size and weight of the wheelchair and its user and there is space for the wheelchair on the vehicle. Mobility devices will not be transported if they are inconsistent with legitimate safety requirements.

13. Wheelchair Securement

Section 38.23(d) of the DOT's ADA regulation requires all ADA compliant vehicles to have a two-part securement system: One to secure the mobility device and a seatbelt and shoulder harness for the wheelchair user (such seat belts and shoulder harnesses shall not be used in lieu of a device which secures the wheelchair or mobility aid itself).

The securement system shall limit the movement of an occupied wheelchair or mobility aid to no more than 2 inches in any direction under normal vehicle operating conditions. 49CFR 38(d)(5). It is recommended that power chairs and scooters be turned to the "OFF" position once on the lift platform and while the lift is in operation.

All wheelchairs must be secured to the floor of the vehicle using the securement equipment.

Passengers will be permitted to use a lift or ramp to board or disembark from a vehicle at any designated stop, unless the lift or ramp cannot be deployed, the lift or ramp will be damaged if it is deployed, or temporary conditions preclude the safe use of the stop by all passengers. Standees should stand in the center of the platform facing the direction of travel. If capable, the passenger should hold both handrails when on the platform.

14. Maintenance Training

MOCO will maintain in operative condition those features of vehicles that are required to make the vehicles readily accessible to and usable by individuals with disabilities. These features include, but are not limited to, lifts and other means of access to vehicles, securement devices, signage and systems to facilitate communications with persons with impaired vision or hearing.

Accessibility features shall be repaired promptly if they are damaged or out of order. When an accessibility feature is out of order, MOCO shall take reasonable steps to accommodate individuals with disabilities who would otherwise use the feature.

The vehicles are maintained by The Montezuma County Road & Bridge Maintenance Department according to the Montezuma County Fleet Policy.

15. Paratransit Service

MOCO does not provide Fixed Route Service and is not responsible to provide Paratransit Service.

16. Eligibility Process for Paratransit

MOCO does not provide Fixed Route Service with responsibility to provide Paratransit Service.

17. REASONABLE MODIFICATION POLICY

No individual with a disability shall, by reason of such disability, be excluded from participation in or be denied the benefits of the services, programs, or activities of MOCO, or be subject to discrimination by MOCO.

A reasonable modification is a change or exception to a policy, practice, or procedure that allows persons with disabilities to have equal access to programs, services, and activities. MOCO will make reasonable modifications to policies, practices, and procedures when necessary to ensure access to transit services for individuals with disabilities, unless:

- ◆ Making the accommodation would fundamentally alter the nature of the public transportation service.
- ◆ Making the accommodation would create a direct threat to the health or safety of other passengers.
- ◆ The individual with a disability is able to fully use MOCO's service without the accommodation being made.
- ◆ Making the accommodation creates an undue financial burden on the transit system.

ELIGIBILITY CRITERIA

An individual is eligible to be considered to receive a reasonable modification if that individual has:

- ◆ A physical or mental impairment that substantially limits one or more of the major life activities of such individual
- ◆ A record of such impairment
- ◆ Or has been regarded as having such impairment.

REQUESTS FOR REASONABLE MODIFICATION

MOCO shall follow these procedures in taking requests:

- a. Individuals requesting modifications shall describe the modification to service needed in order to use the service.
- b. Individuals requesting modifications are not required to use the term "reasonable modification" when making a request. Personnel at MOCO will determine if the request represents a reasonable modification and proceed in accommodating the request accordingly.
- c. Whenever feasible, MOCO requests that individuals make such requests for modifications before MOCO is expected to provide the modified service.

- d. Where a request for modification cannot practicably be made and determined in advance (e.g., because of a condition or barrier at the destination of a paratransit, demand response, or fixed route trip of which the individual with a disability was unaware until arriving), operating personnel shall make a determination of whether the modification should be provided at the time of the request. Operating personnel may consult with MOCO's management before making a determination to grant or deny the request.

Requests for accommodation may be made either orally or in writing. The reasonable accommodation process begins as soon as the request for accommodation is made. The request can be submitted in any written format. Alternative means of filing a request, such as personal interviews, phone calls, or taped requests, will be made available for persons with disabilities if unable to communicate their request in writing or upon request.

INTERACTIVE PROCESS

When a request for accommodation is made, MOCO and the individual requesting an accommodation must engage in a good faith interactive process to determine what, if any accommodation shall be provided. The individual and MOCO must communicate with each other about the request, the process for determining whether an accommodation will be provided, and the potential accommodations. Communication is a priority throughout the entire process.

TIME FRAME FOR PROCESSING REQUESTS TO PROVIDE REASONABLE MODIFICATION

MOCO will process requests for reasonable accommodation and then provide accommodations, where appropriate, in as short a time frame as reasonably possible. MOCO recognizes, however, that the time necessary to process a request will depend on the nature of the accommodation(s) requested and whether it is necessary to obtain supporting information.

GRANTING A REASONABLE MODIFICATION REQUEST

As soon as MOCO determines that a reasonable accommodation will be provided, that decision shall be immediately communicated to the individual. This notice must be in writing in order to maintain the required information for reporting purposes. Upon request, alternative means of response will be provided.

In choosing among alternatives for meeting nondiscrimination and accessibility requirements with respect to new, altered, or existing facilities, or designated or specified transportation services, MOCO shall give priority to those methods that offer services, programs, and activities to qualified individuals with disabilities in the most integrated setting appropriate to the needs of individuals with disabilities.

DENIAL OF REASONABLE MODIFICATION REQUEST

As soon as MOCO determines that a request for reasonable accommodation will be denied, MOCO will communicate the basis for the decision in writing to the

individual requesting the modification. The explanation for the denial will clearly state:

- ◆ The specific reasons for the denial;
- ◆ Any alternative accommodation that may create the same access to transit services as requested by the individual; and
- ◆ The opportunity to file a complaint relative to MOCO's decision on the request.

18. Customer Information Availability & Accessibility

MOCO will provide information needed to access its programs in ADA Accessible Formats upon request. Examples include Large Print, Audio, Braille, etc. To make a request for information in an ADA Accessible Format, please contact the ADA Coordinator, Kelli Hargraves, 970-564-4105, khargraves@co.montezuma.co.us. You may also contact MOCO by calling 970-564-2773.

19. Public Participation/ LEP

MOCO will provide on-going mechanisms in accessible formats to involve the public in decisions regarding its accessible services, proposed service changes, proposed fare increases, policies and procedures, and other similar topics. In Addition, the LEP plan is outlined in the following pages.

Montezuma County Public Transit (MOCO) Limited English Proficiency (LEP) Plan

Adopted: [Insert Date]

Responsible Department: Montezuma County Public Transit

Title VI Coordinator: Kelli Hargraves, Director

Contact: 970-564-4105, khargraves@co.montezuma.co.us

I. Purpose

Montezuma County Public Transit (MOCO) is committed to ensuring meaningful access to transit services for individuals with Limited English Proficiency (LEP) in accordance with:

- Title VI of the Civil Rights Act of 1964
- Executive Order 13166

- U.S. Department of Transportation guidance
- FTA Circular 4702.1B

This plan outlines how MOCO identifies language needs and provides language assistance services free of charge.

II. Four-Factor Analysis

MOCO conducted a Four-Factor Analysis to determine the appropriate level of language assistance.

Factor 1: Number or Proportion of LEP Persons Served

Based on U.S. Census and American Community Survey data for Montezuma County:

- The majority of LEP individuals speak **Spanish**
- Smaller populations may speak Navajo and other languages
- Spanish is the only language that approaches Safe Harbor thresholds. MOCO will continue to monitor demographic changes annually.

Factor 2: Frequency of Contact with LEP Individuals

MOCO interacts with LEP individuals through:

- Ride reservations
- Dispatch calls
- In-person interactions with drivers
- Public meetings and outreach

Because MOCO provides demand-response and public transit services, contact with Spanish-speaking LEP riders occurs rarely, and when it does occur its at reservations and trip scheduling.

Factor 3: Nature and Importance of the Program

Public transportation is a critical, life-sustaining service that provides access to:

- Medical care
- Employment
- Education
- Nutrition services
- Social services

Because denial or delay of transit access can significantly impact quality of life, MOCO places high importance on language access.

Factor 4: Resources Available and Cost

As a rural transit provider, MOCO must balance meaningful access with available resources. However, many language services are low-cost and high-impact.

MOCO currently has the capacity to provide:

- Telephonic interpretation
- Bilingual staff (when available)

III. Language Assistance Measures

MOCO provides the following language assistance services free of charge:

Oral Interpretation

- Telephonic interpretation services available upon request
- Use of bilingual staff when available
- Drivers and dispatch may access interpretation support

Written Translation

MOCO will translate vital documents into Spanish when Safe Harbor thresholds are met, including:

- Title VI Notice
- Complaint Form
- ADA eligibility materials (if applicable)
- Service brochures
- Rider guides (as needed)

Non-vital documents will be translated upon reasonable request.

Website and Digital Access

MOCO will:

- Include a language assistance notice on its website
- Use plain language formatting for accessibility

In-Person Assistance

When interacting with LEP individuals, staff will:

- Access interpretation services
- Avoid using minor children as interpreters
- Document language assistance when required, and language requested

IV. Staff Training

MOCO will ensure staff are trained on:

- Title VI and LEP requirements
- How to access interpretation services
- Working effectively with interpreters
- Cultural sensitivity and respectful communication

Training will occur:

- At new employee orientation
- Periodically thereafter
- When procedures change

V. Monitoring and Updating the LEP Plan

MOCO will review this LEP Plan at least every three years or sooner if:

- Demographics significantly change
- New services are added
- Complaints or concerns indicate a need
- FTA guidance is updated

The review will include:

- Updated Census data
- Ridership feedback

- Complaint review
- Effectiveness of language services

VI. LEP Complaint Process

Individuals who believe they have been denied meaningful language access may file a Title VI complaint.

Complaints may be submitted to:

Montezuma County Public Transit (MOCO)

Attn: Title VI Coordinator

109 W. Main St. Ste 170, Cortez, CO 81321

970-564-4105

khargraves@co.montezuma.co.us

Complaints may be filed in English or Spanish.

VII. Public Notice of Language Assistance

MOCO will provide public notice that language assistance is available by:

- Posting notices in vehicles
- Posting at transit facilities
- Including notice on the website
- Including notice in rider materials

Sample Notice:

Montezuma County Public Transit provides free language assistance services.

If you need help in another language, please call 970-564-2773.

Spanish:

Montezuma County Public Transit ofrece servicios gratuitos de asistencia lingüística.

Si necesita ayuda en otro idioma, llame al 970-564-2773.

VIII. Approval

Approved by: _____

Title: _____

Date: _____

Montezuma County Public Transportation

ADA Demand Response Compliance Plan

Submitted By: MCDSS
109 West Main St, Ste 170
Cortez, CO 81321

Adopted by Montezuma County Board of County Commissioners

Chair: *Jim McElaine*

Date: 3/7/26

Approved by: Colorado Department of Transportation
4201 East Arkansas Avenue
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Table of Contents

1. General Contact Information.....	1
2. General Public Service Information.....	2
Service Area	
Scheduling	
Fares	
Reservation Process	
Fleet Inventory and Accessibility	
3. Reservation Process.....	3
4. Passenger Responsibilities	3
5. Fleet Inventory and Accessibility	3
6. General Service.....	4
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8. Personal Care Attendant Policy	4
9. Complaint Process	5
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11. Driver Responsibilities	6
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MOCO does not provide Fixed Route Service and is not responsible to provide Paratransit Service.

16. Eligibility Process for Paratransit

MOCO does not provide Fixed Route Service with responsibility to provide Paratransit Service.

17. REASONABLE MODIFICATION POLICY

No individual with a disability shall, by reason of such disability, be excluded from participation in or be denied the benefits of the services, programs, or activities of MOCO, or be subject to discrimination by MOCO.

A reasonable modification is a change or exception to a policy, practice, or procedure that allows persons with disabilities to have equal access to programs, services, and activities. MOCO will make reasonable modifications to policies, practices, and procedures when necessary to ensure access to transit services for individuals with disabilities, unless:

- ◆ Making the accommodation would fundamentally alter the nature of the public transportation service.
- ◆ Making the accommodation would create a direct threat to the health or safety of other passengers.
- ◆ The individual with a disability is able to fully use MOCO's service without the accommodation being made.
- ◆ Making the accommodation creates an undue financial burden on the transit system.

ELIGIBILITY CRITERIA

An individual is eligible to be considered to receive a reasonable modification if that individual has:

- ◆ A physical or mental impairment that substantially limits one or more of the major life activities of such individual
- ◆ A record of such impairment
- ◆ Or has been regarded as having such impairment.

REQUESTS FOR REASONABLE MODIFICATION

MOCO shall follow these procedures in taking requests:

- a. Individuals requesting modifications shall describe the modification to service needed in order to use the service.
- b. Individuals requesting modifications are not required to use the term "reasonable modification" when making a request. Personnel at MOCO will determine if the request represents a reasonable modification and proceed in accommodating the request accordingly.
- c. Whenever feasible, MOCO requests that individuals make such requests for modifications before MOCO is expected to provide the modified service.

- d. Where a request for modification cannot practicably be made and determined in advance (e.g., because of a condition or barrier at the destination of a paratransit, demand response, or fixed route trip of which the individual with a disability was unaware until arriving), operating personnel shall make a determination of whether the modification should be provided at the time of the request. Operating personnel may consult with MOCO's management before making a determination to grant or deny the request.

Requests for accommodation may be made either orally or in writing. The reasonable accommodation process begins as soon as the request for accommodation is made. The request can be submitted in any written format. Alternative means of filing a request, such as personal interviews, phone calls, or taped requests, will be made available for persons with disabilities if unable to communicate their request in writing or upon request.

INTERACTIVE PROCESS

When a request for accommodation is made, MOCO and the individual requesting an accommodation must engage in a good faith interactive process to determine what, if any accommodation shall be provided. The individual and MOCO must communicate with each other about the request, the process for determining whether an accommodation will be provided, and the potential accommodations. Communication is a priority throughout the entire process.

TIME FRAME FOR PROCESSING REQUESTS TO PROVIDE REASONABLE MODIFICATION

MOCO will process requests for reasonable accommodation and then provide accommodations, where appropriate, in as short a time frame as reasonably possible. MOCO recognizes, however, that the time necessary to process a request will depend on the nature of the accommodation(s) requested and whether it is necessary to obtain supporting information.

GRANTING A REASONABLE MODIFICATION REQUEST

As soon as MOCO determines that a reasonable accommodation will be provided, that decision shall be immediately communicated to the individual. This notice must be in writing in order to maintain the required information for reporting purposes. Upon request, alternative means of response will be provided.

In choosing among alternatives for meeting nondiscrimination and accessibility requirements with respect to new, altered, or existing facilities, or designated or specified transportation services, MOCO shall give priority to those methods that offer services, programs, and activities to qualified individuals with disabilities in the most integrated setting appropriate to the needs of individuals with disabilities.

DENIAL OF REASONABLE MODIFICATION REQUEST

As soon as MOCO determines that a request for reasonable accommodation will be denied, MOCO will communicate the basis for the decision in writing to the

individual requesting the modification. The explanation for the denial will clearly state:

- ◆ The specific reasons for the denial;
- ◆ Any alternative accommodation that may create the same access to transit services as requested by the individual; and
- ◆ The opportunity to file a complaint relative to MOCO's decision on the request.

18. Customer Information Availability & Accessibility

MOCO will provide information needed to access its programs in ADA Accessible Formats upon request. Examples include Large Print, Audio, Braille, etc. To make a request for information in an ADA Accessible Format, please contact the ADA Coordinator, Kelli Hargraves, 970-564-4105, khargraves@co.montezuma.co.us. You may also contact MOCO by calling 970-564-2773.

19. Public Participation/ LEP

MOCO will provide on-going mechanisms in accessible formats to involve the public in decisions regarding its accessible services, proposed service changes, proposed fare increases, policies and procedures, and other similar topics. In Addition, the LEP plan is outlined in the following pages.

Montezuma County Public Transit (MOCO)

Limited English Proficiency (LEP) Plan

Adopted: [Insert Date]

Responsible Department: Montezuma County Public Transit

Title VI Coordinator: Kelli Hargraves, Director

Contact: 970-564-4105, khargraves@co.montezuma.co.us

I. Purpose

Montezuma County Public Transit (MOCO) is committed to ensuring meaningful access to transit services for individuals with Limited English Proficiency (LEP) in accordance with:

- Title VI of the Civil Rights Act of 1964
- Executive Order 13166

- U.S. Department of Transportation guidance
- FTA Circular 4702.1B

This plan outlines how MOCO identifies language needs and provides language assistance services free of charge.

II. Four-Factor Analysis

MOCO conducted a Four-Factor Analysis to determine the appropriate level of language assistance.

Factor 1: Number or Proportion of LEP Persons Served

Based on U.S. Census and American Community Survey data for Montezuma County:

- The majority of LEP individuals speak **Spanish**
- Smaller populations may speak Navajo and other languages
- Spanish is the only language that approaches Safe Harbor thresholds. MOCO will continue to monitor demographic changes annually.

Factor 2: Frequency of Contact with LEP Individuals

MOCO interacts with LEP individuals through:

- Ride reservations
- Dispatch calls
- In-person interactions with drivers
- Public meetings and outreach

Because MOCO provides demand-response and public transit services, contact with Spanish-speaking LEP riders occurs rarely, and when it does occur its at reservations and trip scheduling.

Factor 3: Nature and Importance of the Program

Public transportation is a critical, life-sustaining service that provides access to:

- Medical care
- Employment
- Education
- Nutrition services
- Social services

Because denial or delay of transit access can significantly impact quality of life, MOCO places high importance on language access.

Factor 4: Resources Available and Cost

As a rural transit provider, MOCO must balance meaningful access with available resources. However, many language services are low-cost and high-impact.

MOCO currently has the capacity to provide:

- Telephonic interpretation
- Bilingual staff (when available)

III. Language Assistance Measures

MOCO provides the following language assistance services free of charge:

Oral Interpretation

- Telephonic interpretation services available upon request
- Use of bilingual staff when available
- Drivers and dispatch may access interpretation support

Written Translation

MOCO will translate vital documents into Spanish when Safe Harbor thresholds are met, including:

- Title VI Notice
- Complaint Form
- ADA eligibility materials (if applicable)
- Service brochures
- Rider guides (as needed)

Non-vital documents will be translated upon reasonable request.

Website and Digital Access

MOCO will:

- Include a language assistance notice on its website
- Use plain language formatting for accessibility

In-Person Assistance

When interacting with LEP individuals, staff will:

- Access interpretation services
- Avoid using minor children as interpreters
- Document language assistance when required, and language requested

IV. Staff Training

MOCO will ensure staff are trained on:

- Title VI and LEP requirements
- How to access interpretation services
- Working effectively with interpreters
- Cultural sensitivity and respectful communication

Training will occur:

- At new employee orientation
- Periodically thereafter
- When procedures change

V. Monitoring and Updating the LEP Plan

MOCO will review this LEP Plan at least every three years or sooner if:

- Demographics significantly change
- New services are added
- Complaints or concerns indicate a need
- FTA guidance is updated

The review will include:

- Updated Census data
- Ridership feedback

- Complaint review
- Effectiveness of language services

VI. LEP Complaint Process

Individuals who believe they have been denied meaningful language access may file a Title VI complaint.

Complaints may be submitted to:

Montezuma County Public Transit (MOCO)

Attn: Title VI Coordinator

109 W. Main St. Ste 170, Cortez, CO 81321

970-564-4105

khargraves@co.montezuma.co.us

Complaints may be filed in English or Spanish.

VII. Public Notice of Language Assistance

MOCO will provide public notice that language assistance is available by:

- Posting notices in vehicles
- Posting at transit facilities
- Including notice on the website
- Including notice in rider materials

Sample Notice:

Montezuma County Public Transit provides free language assistance services.

If you need help in another language, please call 970-564-2773.

Spanish:

Montezuma County Public Transit ofrece servicios gratuitos de asistencia lingüística.

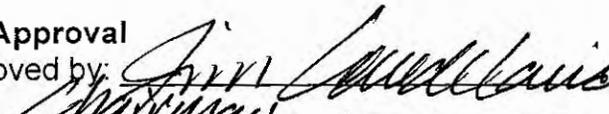
Si necesita ayuda en otro idioma, llame al 970-564-2773.

VIII. Approval

Approved by:

Title:

Date:


3/2/26