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Yellow Cab Drivers Association/Ute Cab Company Inc Civil Rights Act of 1964 and Title VI Plan Policy and Procedures 7/1/2023

Introduction and Purpose

Title VI was enacted as part of the landmark Civil Rights Act of 1964. It prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance. All recipients and subrecipients of Federal Transit Administration (FTA) funds must ensure that programs, policies, and activities comply with FTA Title VI regulations. Because Yellow Cab/Ute Cab supports the Civil Rights Act of 1964, and are sub-recipients of FTA grants, we support and document Federal Law, and rules and regulations supporting equal rights.

Yellow Cab Drivers Association Inc and Ute Cab Company Affirms:

1. Title VI of the Civil Rights Act of 1964 prohibits discrimination in federally assisted programs. Title VI was amended by the Civil Rights Restoration Act of 1987 (P.L. 100-259), effective March 22, 1988, which added Section 606, expanding the definition of the terms "programs or activities" to include all of the operations of an educational institution, governmental entity, or private employer that receives federal funds.
2. Yellow Cab/Ute Cab are privately held corporations contracted to transport the elderly, homeless, poor communities seeking medical assistance, and refugees for the city county state and other firms. It is the policy of Yellow Cab Utah and Ute Cab Company to ensure compliance with Title VI of the Civil Rights Act of 1964 and all related statutes or regulations in all programs and activities so administered.
3. The Yellow Cab/Ute Cab Title VI Coordinator is granted the authority to administer and monitor the Title VI Plan as promulgated under Title VI of the Civil Rights Act of 1964 and any subsequent legislation. The Title VI Coordinator will provide assistance as needed.
4. Yellow Cab/Ute Cab will take all steps to ensure that no person shall, on the grounds of race, color, or national origin, be excluded from participation in, or be denied the benefits of, or be subjected to discrimination under any program or activity of the Companies.
5. Yellow Cab/Ute Cab recognizes the need for annual Title VI training for Agency personnel.

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Owner Yellow Cab/Ute Cab

Date

Policy Statement and Notice to the Public

It is the policy of **Yellow Cab/Ute Cab** to assure nondiscrimination in compliance with Title VI and related nondiscrimination statutes in the delivery of our services. Yellow Cab/Ute Cab participates in on-site reviews and cooperates with FTA/UTA Compliance Staff throughout the review process. This participation with Title VI compliance ensures Yellow Cab/Ute Cab will explain and demonstrate internal support for public information, public access to complaint procedures, and the step by step process for the public. Yellow Cab/Ute Cab has in place:

1. Posters with the required information spelled out below, are clearly displayed in all office and workspaces in Yellow Cab/Ute Cab's operations system. Title VI information is also available in all taxis and includes links and scan codes to access online information such as:
 - Description of Title VI
 - Explanation of how to obtain Title VI information
 - Yellow Cab/Ute Cab Title VI Policy
 - Explanation of how to file a complaint
 - Available complaint forms
2. A current file containing complaints.
3. UTA can conduct periodic on-site monitor assessments to determine if Yellow Cab/Ute Cab remains compliant with the FTA Title VI regulations. These reviews include service measurements, location of transit service and facilities, participation opportunities in the transit planning and decision-making processes, and communication needs of persons with limited English proficiency (LEP).

Yellow Cab/Ute Cab participates in staff and driver training that includes Title VI and its requirements. The UTA Compliance Officer supports our efforts to comply with Title VI regulations with information, training assistance, and complaint procedures that comply with FTA rules. This support includes, but is not limited to:

1. Reviews Title VI and its requirements for compliance.
 - Provides information regarding outreach opportunities to minority populations and demographic information.
2. Provides sample Title VI posters (including required signatures and contact information).
 - Reviews required poster locations.
3. Reviews LEP (Limited English Proficiency) and provides sample UTA LEP tools.
4. Discusses Title VI complaint forms.
5. Provides examples of the Title VI complaint forms.
6. Reviews the required maintenance of a Title VI file readily available for inspection.
7. Reviews the reporting requirements and the annual Certification and Assurances.
 - Discusses the required Title VI verification, including a description of lawsuits and complaints for the past year.

In addition to new subrecipients, training by the UTA Compliance Officer and UTA Civil Rights staff is also conducted as requested and as changes in the law occur, as needed. Both the UTA Compliance Officer and the Civil Rights staff are available any time as a technical

resource for questions or concerns regarding the FTA and Title VI requirements. Yellow Cab/Ute Cab will be available at any time to include new information in our Title VI Plan.

Certification and Assurance Submissions

Yellow Cab/Ute Cab submits an annual Title VI assurance to UTA as part of the annual Certification and Assurance submission process.

Title VI Complaint Procedure

Yellow Cab/Ute Cab accepts that UTA will investigate, and track Title VI complaints filed with UTA against subrecipients.

Procedure for Investigations Complaints and Lawsuits

UTA has developed and maintains a list of any active investigations conducted by entities other than FTA, lawsuits, or complaints naming the recipient and/or subrecipients that allege discrimination on the basis of race, color, or national origin. This list includes the dates of any investigations, lawsuits, or complaints filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by the recipient or subrecipient in response to the investigation.

Title VI Complaint Procedure and Investigation Guidelines

Yellow Cab/Ute Cab has developed procedures for investigating and tracking Title VI complaints filed against them and has made those procedures for filing a complaint available to the public. Yellow Cab/Ute Cab's complaint procedure is outlined below:

Procedures for filing a Title VI Complaint

Any person who believes she or he has been discriminated against on the basis of race, color, or national origin by Yellow Cab/Ute Cab may file a Title VI complaint by completing and submitting a Yellow Cab/Ute Cab Title VI Complaint Form. Yellow Cab/Ute Cab investigates complaints received no more than 180 calendar days after the alleged incident. Yellow Cab/Ute Cab will process complaints that have completed all elements of the complaint form process.

Complaint Review and Acknowledgement

Once the complaint is received, Yellow Cab/Ute Cab will review it to determine if Yellow Cab/Ute Cab has jurisdiction. The complainant will receive an acknowledgment letter informing them whether the complaint will be investigated by Yellow Cab/Ute Cab.

Complaint Investigation

Yellow Cab/Ute Cab has 20 business days to investigate any complaint. If more information is needed to resolve the case, Yellow Cab/Ute Cab may contact the complainant. The complainant will have 10 business days from the date of the letter to send the requested information to the investigator assigned to the case. If Yellow Cab/Ute Cab is not contacted by the complainant or does not receive the additional information within 10 calendar days, the investigator can administratively close the case. A case can also be administratively closed if the complainant no longer wishes to pursue the case.

Complaint Review and Findings

After the assigned company investigator reviews the complaint, Yellow Cab/Ute Cab will issue one of two letters to the complainant:

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

Complaint Appeal Process

If the complainant wishes to appeal the decision, they have 10 calendar days after the date of the closure letter or the LOF to do so. If an appeal has been submitted, Yellow Cab/Ute Cab will forward appeals to the UTA Civil Rights Title VI Compliance Officer within 10 days.

Complaints From Other State and Federal Agencies

When a complaint has been directly filed with another state or federal agency, Yellow Cab/Ute Cab will inform UTA's Title VI Compliance Officer where the complaint has been filed and coordinate any action needed by UTA to resolve the complaint.

Filing Complaints With the FTA

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

Title VI Informal Complaint Policy

Title VI complaints may be resolved by informal means. When informal means are utilized, the complainant is informed of their right to file a formal written complaint. Such informal attempts and their results will be summarized by Yellow Cab/Ute Cab's identified Title VI Coordinator. The coordinator will log the complaint in the required complaint log (see Appendix for a sample). If the complaint cannot be resolved informally, Yellow Cab/Ute Cab's identified Title VI Coordinator must inform the complainant of the formal process outlined above and instruct the complainant on how to proceed.

Title VI Log of Complaints/Lawsuits, etc.

Yellow Cab/Ute Cab maintains a list of any alleged discrimination on the basis of race, color, or national origin, including any active investigations conducted by entities other than FTA, lawsuits, and complaints naming Yellow/Ute Cab. The list will include the date that the investigation lawsuit or complaint was filed; a summary of the allegation(s) and date resolved.

Title VI Public Notices & Participation Plan

Yellow Cab/Ute Cab provides information to the public regarding Yellow Cab/Ute Cab's obligations under FTA's Title VI regulations. The public is informed of the protection against discrimination afforded to them by Title VI. Yellow Cab/Ute Cab disseminates this information to the public by posting instructions on its website and supplying posters in every vehicle and company facility.

Yellow Cab/Ute Cab is committed to compliance with Title VI of the Civil Rights Act of 1964 and all related regulations and relevant guidance. Yellow Cab/Ute Cab assures that no person employed by or being served will be discriminated against on the grounds of race, color, or nation origin. No person will be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity of Yellow Cab/Ute Cab regardless of federal grant policies.

Yellow Cab/Ute Cab's Complaint Procedure online: yellowcabutah.com/about.html.

To request additional information on Yellow Cab/Ute Cab's Title VI policy, or to file a discrimination complaint, please contact Yellow Cab at 801-521-1856.

Limited English Proficiency Assistance Plan

Limited English Proficiency Requirements:

Yellow Cab/Ute Cab is a for profit company. We acknowledge the 4 factor analysis process designed for large, fixed route systems to improve communications with underserved populations in our community living with language barriers. Because of our business design, the LEP community targeted by the 4 factor analysis is an external community attempting to communicate the needs for transportation. However, we communicate across many languages due to the nature of our global fleet and their developed customer bases.

Internally Yellow Cab/Ute Cab's driver pool is approximately 30% local and 70% originating from other countries. Each taxi driver serves his own community in part, and drivers can share clients in a number of languages and dialects. When those clients can't be served, they contact our dispatch office for transportation. When a client's language barriers require translation assistance it's a common practice to group a driver speaking the same languages onto the call for translation.

Yellow Cab/Ute Cab's online assets can be translated into most global languages. To make language barrier communications clearer for all parties we incorporate a translation chat that includes a 'disqus' community post and translation process. When a non-English speaking customer messages the online chat at yellowcabutah.com/chat.html we can translate their message into English immediately.

LEP Service Analysis:

Yellow Cab/Ute Cab is committed to ensuring LEP clients can be identified and assisted when they're seeking our services.

1. Indicating the number or proportion of LEP persons eligible to be served or likely to be encountered by our customer service using the reservation portal, calling our dispatch line, completing an online reservation form, or emailing our company directly.
 - Average daily calls and reservations: Inbound: 450≈, Total calls 870≈
 - Number of daily calls with language barriers requiring translation: <5
 - Number of daily calls with language barriers needing to access ADA transportation: <1 call per day.

Yellow Cab/Ute Cab is contracted with Salt Lake City, Salt Lake County, the state of Utah, and many private organizations and companies to transport the elderly and clients with ADA vehicle requirements. Because the majority of these clients that may have LEP concerns are communicated with during the approval and scheduling process, barriers in communications have already been identified and mitigated.

- Average monthly reservations for all city, county, state, and private reservations (including aging services and ADA requirements): 1750≈
 - Average Monthly ADA reservations system wide: 55≈
 - Average Monthly LEP aging and ADA clients needing communication assistance not already provided by their program provider: <1%.
2. Yellow Cab/Ute Cab's LEP assistance Plan serves a very small subset of clients who can access our transportation services by:
 - Translating our website into the language of choice using Google translation tools. English & Spanish text can be found at yellowcabutah.com/about.html
 - Written text can be offered and translated using our translation chat at yellowcabutah.com/chat.html
 - Culturally sensitive translations can also be done by drivers identified by the client, or by driver volunteers who can translate for us over a conference call any number of global languages.
 - All Title VI, ADA, Equal opportunity information is written in English and Spanish, or can be translated using Google translation tools.
 3. Yellow Cab/Ute Cab continues to evaluate translation and communication issues system wide and will develop communications tools for our transportation customers and driver customers as both groups grow and change within our system. We give information updates and train new drivers and operations staff as our system changes with new processes.