

**ARK-TEX COUNCIL OF GOVERNMENTS
RURAL TRANSIT DISTRICT
TITLE VI PLAN**



4808 Elizabeth Street, Texarkana, TX 75503
903.255.3553 www.atcog.org



TABLE OF CONTENTS

Description of Service.....	3-4
Notice to the Public.....	5
Complaint Procedures & Forms.....	6-13
Transit-Related Title VI Investigations, Complaints & Lawsuits	14
Public Participation Plan.....	15-24
Language Assistance Plan.....	25-37
Membership of Non-Elected Committees & Councils.....	38



Description of Service

Ark-Tex Council of Governments' Rural Transit District (TRAX) provides low-cost transportation services (demand response) for residents in Bowie, Cass, Delta, Franklin, Hopkins, Lamar, Morris, Red River, and Titus counties. Transportation is provided to key locations including but not limited to, medical appointments, shopping, social activities, work, etc. Services are provided to the public with special emphasis on transportation for seniors, individuals with disabilities, and low-income families and individuals. Curb-to-curb services are available to all passengers. Fares are charged for non-subsidized trips and 24 hour advance notice is required in order to schedule a trip.

TRAX supervises the demand-response schedules and oversees the operation of the transit system to assure compliance with non-discriminatory provisions pursuant to Title VI of the Civil Rights Act of 1964, as amended.

Of all 47 transit employees (administration, operations and maintenance) 38% are members of minority groups. The following is a comparison of all transit agency personnel and the general population of the 9-county region:

	<u>Personnel</u>	<u>Service Area</u>
White	62%	71%
African-American	36%	15%
Hispanic	0%	11%
Native American	2%	1%
Asian	0%	.63%
Other	0%	1.8%

Women are not shown as a minority group in the above percentages. However, women comprise 8% of all transit employees at TRAX. According to demographic information released in the 2010 Census, 32% of the entire population of the rural transit district is composed of members of minority groups. The population of the Rural Transit District was reported as 316,598 in the 2010 Census. The Rural Transit District consists of Bowie, Cass, Delta, Franklin, Hopkins, Lamar, Morris, Red River and Titus Counties. The TRAX Fleet is listed below:

TRAX Fleet

<u>Capacity</u> (Ambulatory/WC)	<u>Type</u>	<u>Year</u>	<u>Load</u>	<u>No. of Vehicles</u>
5/1	Chevrolet	07-08	1.0	6
5/2	Dodge	15	1.0	4
8/2	Ford/Chevy	00-09	1.0	5
12/2	Ford	98-09	1.0	1
10/2	Dodge	16	1.0	1



10/2	Chevrolet	09-13	1.0	30
10/3	Chevrolet	11	1.0	2
29/2	Freightliner	99	1.0	1

All vehicles are ADA accessible with wheelchair lifts and/or ramps. All drivers are trained in Passenger Sensitivity, and have CPR-First Aid Certification.

Description of Services (cont.)

TRAX utilizes a 30 minute to one hour time window before the scheduled time of pickup. Scheduling and dispatch software monitors the on-time performance of drivers in the nine county area which can generate reports for review as needed. The software helps to route the buses in a timely manner and helps drivers remain cost effective fuel levels. Our dispatchers are trained in skillful communication with various population groups, including those who need language-assistance to schedule a ride.

TRAX services are based on strong public participation utilizing public meetings, rider surveys, local health and human services agencies and input from our local governments throughout the region to develop services that would meet the needs of the residents in the nine county region that target low-income, minority, transit generators (i.e., deeply populated census blocks), and transit attractors (i.e., businesses, work sites, health and human service agencies).

The Transportation Manager oversees the Transit System and reports directly to the Executive Director. Listed below is the contact information for the Title VI Coordinator:

Emily Green, Transportation Operations Specialist
4808 Elizabeth Street
Texarkana, TX 75503
903.255.3542/egreen@atcog.org

Notice to the Public



Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that, “no person in the United States shall, on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance”. ATCOG’s Rural Transit District’s (TRAX) Title VI Civil Rights Program adheres to the requirements in Chapter IV, “General Requirements and Guidelines” of the Federal Transit Administration’s Circular C 4702.1B.

Ark-Tex Council of Governments has posted the Title VI notification on the ATCOG website (www.atcog.org), at the lobby entrance/receptionist desk of the TRAX Transportation building located at 4808 Elizabeth Street, Texarkana, TX 75503, at the entrance of the TRAX Maintenance Facility located at 105 East 5th Street, Mt. Pleasant, TX 75455, in public meeting rooms at all TRAX facilities and on posters in the transit vehicles.

Title VI Information Dissemination

How information will be provided to the public:

ATCOG’s Rural Transit District operates programs without regard to race, color and national origin and public notices clarify that our Title VI program provides procedures for the public to follow to request additional information on our nondiscrimination obligations.

TRAX will utilize the ATCOG website (www.atcog.org/transportation) to publish the program’s approved Title VI plan. TRAX will also include Title VI language in informational brochures distributed to various social service agencies, to the public during community events, to regular and potential passengers and other opportunities as they arise. Brochures are also available in Spanish.

How information will be provided to TRAX employees:

During New Employee Orientation, new employees shall be informed of the provisions of Title VI and ATCOG’s expectations that employees will perform their duties accordingly. All employees shall be provided a copy of the approved Title VI plan and are required to sign the Acknowledgement of Receipt. Ongoing reminders of anti-discriminatory behavior and actions will be conducted periodically at the supervisory level during regularly scheduled staff meetings.

Title VI Complaint Procedures



This section outlines the Title VI Complaint Procedures related to providing programs, services and benefits. However, it does not deny the complainant the right to file formal complaints with the Equal Employment Opportunity Commission, Federal Transit Administration (FTA), and the Texas Department of Transportation (TxDOT), or seek private counsel for complaints alleging discrimination, intimidation or retaliation of any kind that is prohibited by law.

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color or national origin in programs receiving federal financial assistance.

Any person who believes he or she, individually or as a member of any specific class of persons, has been subjected to discrimination on the basis of race, color, or national origin as noted below may file a written complaint with the Ark-Tex Council of Governments Transportation Program Title VI Coordinator at 4808 Elizabeth Street, Texarkana, TX 75503. Complainants have the right to complain directly to the appropriate federal agency. Every effort will be made to obtain early resolution of complaints. The option of informal meeting(s) between the affected parties and the Title VI Coordinator may be utilized for resolutions. The Title VI Coordinator will notify the Transportation Manager and Executive Director of all Title VI related complaints as well as all resolutions. TRAX will notify the PTC of any Title VI complaints received no later than 10 business days of the receipt of the complaint.

Procedures

1. The complaint must meet the following requirements:
 - a. Complaint must be in writing and signed by the complainant(s). In cases where the Complainant is unable or incapable of providing a written statement, a verbal complaint may be made. The Title VI Coordinator will interview the Complainant and assist the person in converting verbal complaints to writing. All complaints must, however, be signed by the Complainant or his/her representative.
 - b. Include the date of the alleged act of discrimination, date when the complainants became aware of the alleged act of discrimination, the date on which that conduct was discontinued or the latest instance of conduct.
 - c. Present a detailed description of the issues, including names and job titles of those individuals perceived as parties in the complaint.
 - d. Federal and state law requires complaints be filed within 180 calendar days of the alleged incident.
2. Upon receipt of the complaint, the Title VI Coordinator will determine need for additional information, and will investigate the merit of the complaint.
3. The Complainant will be provided with a written acknowledgement that ATCOG has either accepted or rejected the complaint.
4. A complaint must meet the following criteria for acceptance:
 - a. The Complaint must be filed within 180 days of the alleged occurrence.
 - b. The allegation must involve a covered basis such as race, color or national origin



- c. The allegation must involve ATCOG Transportation Services of one of its Federal-Aid subcontractor, or contractor.
5. A complaint may be dismissed for the following reason:
 - a. The Complainant requests the withdrawal of the complaint.
 - b. The Complainant fails to respond to repeated requests for additional information needed to process the complaint.
 - c. The Complainant cannot be located after reasonable attempts.
6. Once ATCOG's Title VI Coordinator decides to accept the complaint for investigation, the Complainant will be notified in writing of such determination. The complaint will receive a case number and will be tracked on a log that will identify the complainants name, basis, alleged harm, race, color and national origin of the Complainant.
7. Once ATCOG's Title VI Coordinator completes the investigation a report will be submitted to the Executive Director within 90 calendar days from the date of the acceptance of the complaint. The report will include a narrative description of the incident, identification of persons interviewed, findings and recommendations for disposition.
8. The report and its findings will be reviewed by the Title VI Coordinator and the Executive Director and in some cases may be reviewed by ATCOG's Legal Counsel. The report will be modified as needed.
9. The Executive Director will make a determination on the disposition of the complaint. Dispositions will be stated as follows:
 - a. In the event ATCOG is in non-compliance with Title VI regulations remedial actions will be listed.
10. Notice of the Executive Director's determination will be mailed to the Complainant. Notice shall include information regarding appeal rights of Complainant and instructions for initiating such an appeal. Notice of appeals are as follows:
 - a. ATCOG will reconsider this determination, if new facts come to light. If Complainant is dissatisfied with the determination and/or resolution set forth by ATCOG, the same complaint may be submitted to the Federal Transit Administrator (FTA) for investigation. Complainant will be advised to contact the Title VI Program Coordinator, Federal Transit Administration Office of Civil Rights, East Building, 5th Floor-TCR, 1200 New Jersey Ave. SE, Washington, DC 20590.
11. A copy of the complaint and ATCOG's investigation report/letter of finding and Final Remedial Action Plan, if appropriate will be issued to FTA within 120 days of the receipt of the complaint.
12. A summary of the complaint and its resolution will be included as part of the Title VI updates to the FTA.

If the complainant is not satisfied with ATCOG resolutions, complaint forms (also available in Spanish) can be obtained from the Ark-Tex Council of Governments Rural Transit District, located at 4808 Elizabeth Street, Texarkana, TX 75503 or on the ATCOG website at www.atcog.org/transportation. TRAX will notify TxDOT within 10



working days of any complaints filed with them. If information is needed in another language, please contact 903.255.3542.

Complaints can also be directly filed with the following agencies:

Texas Department of Transportation
Attn: TxDOT-PTN
125 East Street
Austin, TX 78701-2483

Federal Transit Administration Region 6 Office
819 Taylor Street, Room 8A36
Fort Worth, TX 76102

U.S. Department of Transportation Office of Civil Rights
1200 New Jersey Ave., SE
Washington, DC 20590

Record Keeping Requirements

The Title VI Coordinator will ensure that all records relating to ATCOG's Title VI Complaint Process are maintained with transportation department records. Records will be available for compliance review audits. As a result of the investigation, the Title VI Coordinator will issue one of two letters to the Complainant: a Closure Letter (unsubstantiated) or a Letter of Finding (LOF) (substantiated). A Closure Letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed. An LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff members, or other action will occur. If the complainant wishes to appeal the decision, he/she has 10 business days after the date of the letter or the LOF to do so.

Appeals Process

Appeal to the ATCOG Executive Director must be in writing, filed within 30 business days of the mailing of findings to the Complainant, and must include the name, address, telephone number of the complainant and must state the basis why the Complainant believes the resolution of the complaint was not correct. The Executive Director will set a mutually agreed upon time and place for review and consideration of the appeal with the Complainant. The Executive Director will issue a written determination of the appeal within 15 business days of the date of the review meeting.



Appeals to the Federal Transit Administration may be submitted to Federal Transit Administration, Office of Civil Rights, Attn: Title VI Coordinator, East Building, 5th Floor, TCR, 1200 New Jersey Avenue SE, Washington, DC 20590.

Implementation of Remedial Actions

If, at any time, a policy violation is found to exist, the appropriate remedial steps will be taken immediately and documented accordingly.

Recordkeeping/Reporting Requirements

The Title VI Coordinator is responsible for all recordkeeping and reporting requirements of appeals under this policy and procedure.

Rural Transit District
Title VI Compliance Plan



Have you filed a complaint with any other federal, state or local agencies? (Circle one) Yes No

Agency: _____ Contact Name: _____

Address: _____

City, State & Zip: _____ Phone: _____

Agency: _____ Contact Name: _____

Address: _____

City, State % Zip: _____ Phone: _____

I affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

Print Name: _____ Date: _____

Signature: _____

Date Received: _____
Received By: _____

Título VI queja **forma**
Ark-Tex Consejo de Gobiernos--Distrito de Tránsito Rural

Rural Transit District
 Title VI Compliance Plan



TRAX se compromete a garantizar que ninguna persona es excluida de la participación en o negada los beneficios de sus servicios sobre la base de raza, color u origen nacional, conforme a lo dispuesto por el título VI de la ley de derechos civiles de 1964, enmendada. Quejas de título VI deben ser presentadas dentro de 180 días desde la fecha de la supuesta discriminación. La siguiente información es necesaria para ayudarnos a procesar su queja. Si necesita ayuda para completar este formulario, póngase en contacto con el Coordinador del título VI llamando al 903.255.3529. El formulario debe enviarse a la TRAX Coordinador título VI 4808 Elizabeth Street, Texarkana, TX 75503.

Su nombre:	Telefono:
	Telefono alternativo:
	Cuidad, Estado y Codigo Postal:
Persona(s) objeto de discriminacion (si alguien que no sea acusador):	
Nombre(s):	
Direccion, Cuidad, Estado y Codigo Postal	

¿Cuál de los siguientes describe mejor la razón de la discriminación alegada ocurrió? (Circule uno) Fecha del incidente: _____

Raza Color Origen Nacional (Dominio Limitado del Ingles)

Por favor describa el incidente discriminatorio. Proporcionar los nombres y títulos de todos los empleados TRAX involucrados, si está disponible. Explicar lo que sucedió y que crees era responsable. Utilice la página siguiente de esta forma si se requiere espacio adicional.

Rural Transit District
Title VI Compliance Plan



¿Se han presentado una denuncia con otras agencias federales, estatales o locales? (Circule uno) Sí No

Agencia: _____ Nombre de contacto: _____

Direccion: _____

Cuidad, Estado y Codigo Postal: _____

Telefono: _____

Agencia: _____ Nombre de Contacto: _____

Direccion: _____

Cuidad, Estado y Codigo Postal: _____

Telefono: _____

Afirmo que he leído la carga arriba y que es fiel a lo mayor de mi conocimiento, la informacion y la creencia.

Denunciates Firma: _____ Fecha: _____

Imprima o Escriba el nombre del Demandante: _____

Fecha de recepcion: _____
Recibido por: _____

**List of Lawsuits
Complaints Alleging Discrimination
Summary of Civil Rights Review Activities**

or

Rural Transit District
Title VI Compliance Plan



As of June 1, 2017, there are no active lawsuits or complaints naming ATCOG Rural Transit District that allege discrimination on the basis of race, color or national origin.

The person/persons whose signature(s) appear below is/are authorized to sign this assurance on behalf of the grant applicant or recipient.

Chris Brown
Executive Director

Date

**Ark-Tex Council of Governments Rural Transit District
Public Participation Plan**



The purpose of this plan is to establish procedures that allow for, encourage, and monitor participation of all citizens in the Ark-Tex Council of Governments Rural Transit District service area, including, but not limited to, low income and minority individuals, and those with limited English proficiency. While traditional public involvement may not reach such individuals, or might not allow for meaningful avenues of input, the intent of this effort is to take reasonable actions throughout the planning process to provide opportunities for historically under-served populations to participate.

This plan outlines procedures to provide opportunities for all area citizens to participate in the development of ATCOG's Rural Transportation programs. ATCOG's Rural Transit District (TRAX) is comprised of the following counties in Texas: Bowie, Cass, Delta, Franklin, Hopkins, Lamar, Morris, Red River and Titus. ATCOG coordinates with and is a member of the Texarkana Metropolitan Planning Organization (MPO). The MPO is the agency charged with transportation planning for cities and counties in the ATCOG region and the development of plans such as the Metropolitan Transportation Plan and the Transportation Improvement Plan. A locally developed comprehensive service plan is currently in place that addresses the current transportation service infrastructure and the future transportation needs of our region. A steering committee made up of stakeholders throughout the service area meets regularly to discuss the transportation needs and issues of our region.

Dissemination of Plan:

A notice will be posted in the local newspaper noting the existence of this public participation plan and a copy of the Public Participation Plan will be sent, at a minimum to the Steering Committee Stakeholders identified in Appendix A.

Goals and Objectives for the Public Participation Plan:

The goal of the Public Participation Plan is to offer opportunities for the engagement of all citizens of the TRAX service area to participate in the development of TRAX transportation program.

Objectives:

1. To determine what non-English languages and other cultural barriers exist to public participation.
2. To provide a general notification of a date and time of meetings particularly forums for public input, in a manner that is understandable to all populations in the nine county area
3. To hold meetings in locations such as senior centers, local government buildings, and other entities which are accessible and reasonably welcoming to all area residents including, but not limited to, low-income and minority members of the public.
4. To provide avenues for two way flow of information and input from populations which are not likely to attend meetings.
5. To provide a framework of actions appropriate to various types of plans and programs, as well as amendments or alterations to any such plan or program.



6. To use various illustrative visualization techniques to convey the information including but not limited to charts, graphs, maps and the internet.

Identification of Stakeholders:

Stakeholders are those who are either directly or indirectly affected by a plan or the recommendations of that plan. Those who may be adversely affected or who may be denied benefit of a plan's recommendation(s) are of particular interest in the identification of specific stakeholders. Stakeholders are broken down into several groups: general citizens, minority and low-income persons, public agencies, and private organizations and businesses. TRAX has a stakeholders group in place—Health & Human Services Coordination Steering Committee which is made up of regional stakeholders with a vested interest in public transportation services. TRAX has made extensive efforts to include representatives from as many health & human service organizations, educational institutions, city and county planning, senior services, workforce, and state government.

Strategies to utilize in order to engage target populations and increase outreach efforts:

- Public Notices in local newspapers (including Spanish versions)
- Public “open house” format meetings
- Public surveys for both current and potential passengers
- Use of local news media
- Focus groups for the purpose of gaining input from a particularly defined portion of the community
- Advocacy groups to disseminate or gather information for minority and low-English proficiency populations
- Presentations to professional, citizen, and student organizations
- Articles in community newsletters
- Press releases in local newspapers and media outlets
- Presentations by experts on various transit-related subjects
- The use of various illustrative visualizations techniques to convey the information including, but not limited to, charts, graphs, photos, maps and social media.

General Population:

There are 316,598 resident in the nine county TRAX service region (2010 Census). 80% of the population consider themselves to be a solely white race. In the region 83% of households speak English only and 10% speak a language other than English; of that 10%, .05% do not speak English well.

Minority Population:

Minority populations make up approximately 32% of the population in the TRAX service region. African-Americans make up the largest minority with 17% of the total minority population. Hispanic and Asian persons account for 12% and .01% of the population respectively. There is



also a small number of American Indians which represents .01% of the population. We also have .02% who identify themselves as “other”. (2010 Census)

Low Income Population:

18% of the population within the TRAX service area are below poverty level (2010 Census). The low-income population should be given every reasonable opportunity to provide input on transportation plans and programs to avoid disproportionate harm or lack of benefit of transportation programs and projects. While low-income individuals may have access to all of the traditional means of public involvement, as discussed below they may be less likely to become involved or offer input.

Public Agencies, Private Organizations & Businesses:

Public agencies can provide valuable input to the planning process, in addition to assisting in gaining participation from traditionally under-represented populations. Pertinent public agencies include those that have clients who fall into under-represented populations, including but not limited to, minorities, low-income individuals, and limited English proficiency households. These agencies have great insight into the transportation needs of their clients and are useful partners in overcoming difficult barriers that may not be understood by professionals dealing with the provisions of transportation services.

Community Outreach:

Hispanic Radio Stations
KIMP LA Super K
1798 W. US Hwy. 67
Mt. Pleasant, TX 75455

Hispanic Newspaper
La Presnsa Hispana
110 East 2nd Street
Mt. Pleasant, TX 75455

Hispanic Banks
Red River Credit Union
Beside Vero’s Latino Store
2106 New Boston Rd.
Texarkana, TX 75501

Hispanic Education
Texas High School
Attn: Mindy McAfee, Coord. Multilingual Ed.
3413 Summerhill Rd.
Texarkana, TX 75503

Hispanic Church
Iglesia De Dios-Septimo Dia
1305 East 1st Street
Mt. Pleasant, TX 75455

Super Plaza
1210 West Ferguson
Mt. Pleasant, TX 75455

Mt. Pleasant Public Library
601 North Madison
Mt. Pleasant, TX 75455

Private Organizations and Businesses:

Private organizations and businesses offer a number of perspectives that are valuable to the planning process. Often, transportation for employees is of critical concern to private sector employers.



Public Participation Plan:

This plan will serve as the Public Participation Plan for the Ark-Tex Council of Governments TRAX Transportation Program. Availability of the policy for review will be advertised in a manner reasonably expected to reach the general public, as well as minority populations, low-income persons, and other traditionally under-served populations. People can obtain information about the process or submit info to:

Rural Transit District (TRAX)
4808 Elizabeth Street
Texarkana, TX 75503
903.255.3553; nhoehn@atcog.org
Contact: Nancy Hoehn, Transportation Manager

Availability of Planning Documents:

During the planning process TRAX will make documents available for review on our website at www.atcog.org/transportation or at our office located at 4808 Elizabeth Street, Texarkana, TX 75503. If materials are requested in alternative formats, TRAX will make a reasonable attempt to accommodate those needs.

Methods of Addressing Comments:

Comments will be documented, presented to decision-making bodies, modified in the contents of the document as necessary, and will be included in the appendices of planning documents after they are approved and published. Comments after studies and other planning documents are completed and approved will be documented and referenced when amending or updating the planning products in the future.

Response to Information Requests and Comments:

Information can be requested from staff in person and by phone, fax, email, and postal mail.

Community Outreach and Public Participation:

As an agency receiving federal financial assistance, TRAX has made the following community outreach efforts:

- TRAX staff participates in area community events to promote transit and mobility options such as health fairs conducted with the Area Agency on Aging.
- ATCOG and TRAX advertise in newspapers, on the ATCOG website, and at regional planning meetings where the public is invited to attend.
- TRAX partners with Greyhound Bus and publishes available routes and times on the ATCOG website (Transportation page) and at Greyhound stops.
- ATCOG partners with the Texarkana Metropolitan Planning Organization (MPO) by providing input on public transportation issues by serving on both the MPO Technical and Planning Committees.



- TRAX Mobility Management program provides travel training and various other outreach efforts to directly engage the public and other agencies using transportation services.

Planning efforts for 2017-2018 and beyond:

Ark-Tex Council of Governments Rural Transit District has recently launched the “Paris Metro” Fixed-Route and accompanying Paratransit service in Paris, TX. Planning will continue to improve/expand that service. A similar project is underway in Mt. Pleasant, TX where the



current deviated fixed-route service is being evaluated for possible conversion to fixed-route/paratransit service. That project has started in 2017 and will continue into 2018. In 2018 service in Sulphur Springs will be further evaluated for the possibility of a fixed-route/paratransit system.

At the same time planning is taking place for cross-jurisdictional transportation in cooperation with East Texas Council of Governments. A demonstration planning grant has been applied for to move this process forward. Another topic of great interest to TRAX is meeting the transportation needs of veterans. This is a recognized need throughout the service area and measures are being taken to try and close those gaps.

The goal of the Transit District is to provide safe, efficient and affordable transportation for the residents of the 9 Counties in NE Texas. Through dedicated planning efforts this goal becomes more achievable.

Regional Coordination Steering Committee FY16

Public Transit Agencies:

Nancy Hoehn, Chairperson

Pam Durham



Public Transportation Manager
ATCOG, T Line Urban District
nhoehn@atcog.org
903.255.3553

Eric Elmore
Administrative Coordinator
Texarkana Urban Transit District
eelmore@atcog.org
903.794.0746

ReaDonna Jones
Executive Director
Texarkana MPO
txkmpo@txkusa.org
903.798.3927

Health & Human Services:

Shelia Reece
Associate Vice President
Student Access & Success
Paris Junior College
sreece@parisjc.edu
903.785.7661

Jack Pappas
Chief Probation Officer
Bowie County Adult Probation
pappasj@txkusa.org
903.798.3051

Robert Morris (Tiffani Arnold-Sub)
Project Manager
Department of Assistive & Rehab Services
Tiffani.arnold@dars.state.tx.us
903.255.3211 903.255.3223 (tiffani)

Amy Smith
Legal Director
Domestic Violence Prevention, Inc.
amy@dvptxk.org
903.794.4000

Mobility Specialist
ATCOG
pdurham@atcog.org
903.255.3503

Myra Jones
Transportation Director
Opportunities, Inc.
mjones@oppinc.org
903.791.2295

Emily Neely
Coor. of Community Health Svcs.
Paris/Lamar Co. Health District
emilyn@suddenlinkmail.com
903.784.7548

April Carl
Executive Director
United Way of Lamar County
april.carl@lamarcountyuw.org
903.784.6642

Sharon Reynerson
Litigation Director
NE Region Lone Star Legal Aid
sreynerson@lonestarlegalaid.org
903.785.8700

Eden Leach
Executive Director
Senior Citizens Services of Txk
scstxk@cableone.net
903.831.7696



Sharon Davis
Workforce Solutions
Sharon.davis@networks.org
903.794.9490 x 103

Tarisha Duson
Self Sufficiency Specialist
Housing Authority of Texarkana
tdunson@texarkanaha.org
903.838.8548 x106

Johnie Smith
Director of Research & Development
Bowie County Adult Probation
jsmith@txkusa.org
903.824.0240

Gay Ballew
Executive Director
New Hope Women's Shelter
newhopegay@suddenlinkmail.com
903.783.0353

Ken Kunkel
VA Service Representative
Bowie County Courthouse
vso@txkusa.org
903.628.6816

Government:

Robbin Bass
Regional Representative
Congressman John Ratcliffe (TX-04)
Robbin.bass@mail.house.gov
903.832.3173

Committee Vice Chairperson:

Jennifer Laurent
Executive Director
Randy Sams Outreach Shelter
jenniferlaurent@cableone.net
903.792.7024

Disabled Citizen:

Jackie Alsobrook
903.785.3770

William Conder
903.784.7399

Ex-Officio Member:

Sonya Hudson
PTC-Atlanta District
TX Dept. of Transportation

General Public:

Rev. R.C. Slaughter
Lamar Co. Christian Minister
rdnyslaughter@yahoo.com



Sonya.hudson@txdot.gov
903.799.1310

**TITLE VI PUBLIC PARTICIPATION SURVEY
RURAL TRANSIT DISTRICT**



**ARK-TEX RURAL TRANSIT DISTRICT
TITLE VI COMPLIANCE:
LIMITED ENGLISH PROFICIENCY
ANALYSIS AND ASSISTANCE PLAN**

MAY 2017



Background:

The U.S. Department of Transportation (DOT) requires that DOT recipients take responsible steps to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for individuals who are Limited English Proficient (LEP). DOT recommends that recipients use the DOT LEP Guidance to determine how best to comply with statutory and regulatory obligations to provide meaningful access to the benefits, services, information and other important portions of their programs and activities for individuals who are LEP. Executive Order 13166, "Improving Access to Services for Person with Limited English Proficiency," reprinted at 65 FR 50121 (August 16, 2000), directs each Federal agency to examine the services it provides and develop and implement a system by which LEP persons can meaningfully access those services. The Executive Order states that recipients must take reasonable steps to ensure meaningful access to their programs and activities by LEP persons.

Public transit is a key means of achieving mobility for many LEP persons. According to the 2010 Census, more than 11% of LEP persons aged 16 years and over reported use of public transit as their primary means of transportation to work, compared with about 4% of English speakers. Recent immigrants to the United States (including those persons who may not be LEP) use public transportation at higher rates than native-born adults. Agencies that provide language assistance to persons with limited English proficiency in a competent and effective manner will help ensure that their services are safe, reliable, convenient, and accessible to those persons. These efforts may attract riders who would otherwise be excluded from participating in the service because of language barriers. Catering to LEP persons may also help increase and retain ridership among the agency's broader immigrant communities in two important ways: (1.) agencies that reach out to recent immigrant populations in order to prepare a language implementation plan send a positive message to these persons that their business is valued; and (2.) community outreach designed to identify appropriate language assistance measures can also assist the agency in identifying the transportation needs of immigrant populations.

Legal basis for language assistance requirements:

Title VI of the Civil Rights Act of 1964, 42 U.S.C 2000d et seq., and its implementing regulations provide that no person in the United States shall, on the grounds of race, color or national origin be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity that receives federal financial assistance. The Supreme Court, in *Lau v. Nichols*, 414 U.S. 563 (1974), interpreted Title VI regulations to hold that Title VI prohibits conduct that has a disproportionate effect on LEP persons because such conduct constitutes national origin discrimination. Executive Order 13166, "Improving Access to Services with Limited English Proficiency" reprinted at 65 FR 50121 (August 16, 2000), directs each Federal agency to examine the services it provides and develop and implement a system by which LEP persons can meaningfully access those services. The Executive Order states that recipients must take reasonable steps to ensure meaningful access to their programs and activities by LEP persons.



The Four Factor Analysis:

Recipients are required to take reasonable steps to ensure meaningful access to their programs and activities by LEP persons. While designed to be a flexible and fact-dependent standard, the starting point is an individualized assessment that balances the following four factors: (1.) The number of proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the recipient or grantee; (2.) the frequency with which LEP individuals come in contact with the program; (3.) the nature and importance of the program, activity, or service provided by the recipient to the people’s lives; and (4.) the resources available to the recipient and costs.

Factor 1: The Number and Proportion of LEP Persons Served/Encountered in Eligible Service Populations

In the Ark-Tex Rural Transit District there is a small population of people with Limited English Proficiency (LEP). The Ark-Tex Rural Transit District serves a nine county rural area made up of the Texas counties Bowie, Cass, Delta, Franklin, Hopkins, Lamar, Morris, Red River and Titus Counties. As indicated by Tables 1-A through 1-I, the primary demographic that represents the Ark-Tex Rural Transit District LEP population are primarily English speaking people. The Ark-Tex Rural Transit District, with 4,858 Spanish speakers who speak English “not well” or “not at all” makes up only 1.92% of all Spanish speakers.

Rural Transit District
Title VI Compliance Plan



Table 1-A

Population 5 Years & Older By Language Spoken at Home and Ability to Speak English	Bowie County (Number)	Bowie County (Percent)
5 years and older	83,487	100%
Speak only English	78,919	94.5%
Language other than English	4,568	5.5%
Spanish	3,524	100%
Speaks English "very well"	2,614	74.2%
Speaks English "well"	488	13.8
Speaks English "not well"	353	10%
Speaks English "not at all"	69	2%
Other Indo-European	621	100%
Speaks English "very well"	430	69%
Speaks English "well"	89	14%
Speaks English "not well"	102	16%
Speaks English "not at all"	0	0%
Asian & Pacific Island	347	100%
Speaks English "very well"	268	77%
Speaks English "well"	45	13%
Speaks English "not well"	34	9.8%
Speaks English "not at all"	0	0%
All Other Languages	76	100%
Speaks English "very well"	35	46%
Speaks English "well"	41	53.9%
Speaks English "not well"	0	0%
Speaks English "not at all"	0	0%
Ability to Speak English		
5 Years and older	83,487	100%
Other than English	4,568	5.5%
5 to 17 years	610	0.7%
18 to 64 years	3,680	4.4%
65 and over	278	0.3%
English less than "very well"	1,221	1.5%
5 to 17 years	252	0.3%
18 to 64 years	847	1%
65 years & over	122	0.1%
Speak English in Household		
Linguistically isolated household (1)	196	(X)
5 Years and Older	76,663	100%
Linguistically isolated household (1)	476	0.6%
5 to 17 years	122	0.2%
18 to 64 years	314	0.4%
65 and over	40	0.1%

Rural Transit District
Title VI Compliance Plan



Table 1-B

Population 5 Years & Older By Language Spoken at Home and Ability to Speak English	Cass County (Number)	Cass County (Percent)
5 years and older	28,613	100%
Speak only English	27,702	96.8%
Language other than English	911	3.2%
Spanish	717	100%
Speaks English "very well"	423	59%
Speaks English "well"	145	20.2%
Speaks English "not well"	139	19.4%
Speaks English "not at all"	10	1.4%
Other Indo-European	127	100%
Speaks English "very well"	103	81%
Speaks English "well"	15	11.8%
Speaks English "not well"	9	7.1%
Speaks English "not at all"	0	0%
Asian & Pacific Island	52	100%
Speaks English "very well"	36	69%
Speaks English "well"	8	15.4%
Speaks English "not well"	8	15.4%
Speaks English "not at all"	0	0%
All Other Languages	15	100%
Speaks English "very well"	15	100%
Speaks English "well"	0	0%
Speaks English "not well"	0	0%
Speaks English "not at all"	0	0%
Ability to Speak English		
5 Years and older	28,613	100%
Other than English	911	3.2%
5 to 17 years	209	0.7%
18 to 64 years	644	2.3%
65 and over	58	0.2%
English less than "very well"	334	1.2%
5 to 17 years	98	0.3%
18 to 64 years	213	0.7%
65 years & over	23	0.1%
Speak English in Household		
Linguistically isolated household (1)	57	(X)
5 Years and Older	28,139	100%
Linguistically isolated household (1)	143	0.5%
5 to 17 years	58	0.2%
18 to 64 years	82	0.3%
65 and over	0	0%

Rural Transit District
Title VI Compliance Plan



Table 1-C

Population 5 Years & Older By Language Spoken at Home and Ability to Speak English	Delta County (Number)	Delta County (Percent)
5 years and older	5,048	100%
Speak only English	4,936	97.8%
Language other than English	112	2.2%
Spanish	74	100%
Speaks English "very well"	60	81.1%
Speaks English "well"	5	6.8%
Speaks English "not well"	9	12.2%
Speaks English "not at all"	0	0%
Other Indo-European	6	100%
Speaks English "very well"	6	100%
Speaks English "well"	0	0%
Speaks English "not well"	0	0%
Speaks English "not at all"	0	0%
Asian & Pacific Island	32	100%
Speaks English "very well"	18	56.3%
Speaks English "well"	14	43.8%
Speaks English "not well"	0	0%
Speaks English "not at all"	0	0%
All Other Languages	0	0%
Speaks English "very well"	0	0%
Speaks English "well"	0	0%
Speaks English "not well"	0	0%
Speaks English "not at all"	0	0%
Ability to Speak English		
5 Years and older	5,048	100%
Other than English	112	2.2%
5 to 17 years	28	0.6%
18 to 64 years	69	1.4%
65 and over	15	0.3%
English less than "very well"	28	0.6%
5 to 17 years	0	0%
18 to 64 years	15	0.3%
65 years & over	13	0.3%
Speak English in Household		
Linguistically isolated household (1)	0	(X)
5 Years and Older	4,929	100%
Linguistically isolated household (1)	0	0%
5 to 17 years	0	0%
18 to 64 years	0	0%
65 and over	0	0%

Rural Transit District
Title VI Compliance Plan



Table 1-D

Population 5 Years & Older By Language Spoken at Home and Ability to Speak English	Franklin County (Number)	Franklin County (Percent)
5 years and older	8,897	100%
Speak only English	7,999	89.9%
Language other than English	898	10%
Spanish	764	100%
Speaks English "very well"	385	50.4%
Speaks English "well"	163	21.3%
Speaks English "not well"	151	19.8%
Speaks English "not at all"	65	8.5%
Other Indo-European	107	100%
Speaks English "very well"	89	83.2%
Speaks English "well"	16	15%
Speaks English "not well"	2	1.9%
Speaks English "not at all"	0	0%
Asian & Pacific Island	9	100%
Speaks English "very well"	8	88.9%
Speaks English "well"	1	11%
Speaks English "not well"	0	0%
Speaks English "not at all"	0	0%
All Other Languages	18	100%
Speaks English "very well"	18	100%
Speaks English "well"	0	0%
Speaks English "not well"	0	0%
Speaks English "not at all"	0	0%
Ability to Speak English		
5 Years and older	8,897	100%
Other than English	898	10%
5 to 17 years	240	2.7%
18 to 64 years	609	6.8%
65 and over	49	0.6%
English less than "very well"	398	4.5%
5 to 17 years	79	0%
18 to 64 years	298	3.3%
65 years & over	21	0.2%
Speak English in Household		
Linguistically isolated household (1)	64	(X)
5 Years and Older	8,735	100%
Linguistically isolated household (1)	182	2.1%
5 to 17 years	53	0%
18 to 64 years	122	1.4%
65 and over	7	0%

Rural Transit District
Title VI Compliance Plan



Table 1-E

Population 5 Years & Older By Language Spoken at Home and Ability to Speak English	Hopkins County (Number)	Hopkins County (Percent)
5 years and older	29,908	100%
Speak only English	26,964	90%
Language other than English	2,944	9.8%
Spanish	2,608	100%
Speaks English "very well"	1,336	51.2%
Speaks English "well"	570	21.9%
Speaks English "not well"	418	16%
Speaks English "not at all"	284	10.9%
Other Indo-European	200	100%
Speaks English "very well"	156	78%
Speaks English "well"	29	14.5%
Speaks English "not well"	15	7.5%
Speaks English "not at all"	0	0%
Asian & Pacific Island	111	100%
Speaks English "very well"	57	51.4%
Speaks English "well"	54	48.6%
Speaks English "not well"	0	0%
Speaks English "not at all"	0	0%
All Other Languages	25	100%
Speaks English "very well"	25	100%
Speaks English "well"	0	0%
Speaks English "not well"	0	0%
Speaks English "not at all"	0	0%
Ability to Speak English		
5 Years and older	29,908	100%
Other than English	2,944	9.8%
5 to 17 years	820	2.7%
18 to 64 years	2,084	7.0%
65 and over	40	0.1%
English less than "very well"	1,370	4.6%
5 to 17 years	222	0%
18 to 64 years	1,138	3.8%
65 years & over	10	0%
Speak English in Household		
Linguistically isolated household (1)	285	(X)
5 Years and Older	29,435	100%
Linguistically isolated household (1)	847	2.9%
5 to 17 years	216	0.7%
18 to 64 years	628	2
65 and over	7	0%



Table 1-F

Population 5 Years & Older By Language Spoken at Home and Ability to Speak English	Lamar County (Number)	Lamar County (Percent)
5 years and older	45,106	100%
Speak only English	42,989	95.3%
Language other than English	2,117	4.7%
Spanish	1,517	100%
Speaks English "very well"	923	60.8%
Speaks English "well"	299	19.7%
Speaks English "not well"	238	15.7%
Speaks English "not at all"	57	3.8%
Other Indo-European	414	100%
Speaks English "very well"	265	64%
Speaks English "well"	69	16.7%
Speaks English "not well"	66	15.9%
Speaks English "not at all"	14	3.4%
Asian & Pacific Island	169	100%
Speaks English "very well"	135	79.9%
Speaks English "well"	22	13%
Speaks English "not well"	12	7%
Speaks English "not at all"	0	0%
All Other Languages	17	100%
Speaks English "very well"	11	64.7%
Speaks English "well"	0	0%
Speaks English "not well"	6	35%
Speaks English "not at all"	0	0%
Ability to Speak English		
5 Years and older	45,106	100%
Other than English	2,117	4.7%
5 to 17 years	462	1%
18 to 64 years	1,541	3.4%
65 and over	114	0.3%
English less than "very well"	783	1.7%
5 to 17 years	132	0.3%
18 to 64 years	616	1.4%
65 years & over	35	0.1%
Speak English in Household		
Linguistically isolated household (1)	161	(X)
5 Years and Older	43,997	100%
Linguistically isolated household (1)	517	1.2%
5 to 17 years	136	0.3%
18 to 64 years	369	0.8%
65 and over	369	0.8%

Rural Transit District
Title VI Compliance Plan



Table 1-G

Population 5 Years & Older By Language Spoken at Home and Ability to Speak English	Morris County (Number)	Morris County (Percent)
5 years and older	12,302	100%
Speak only English	11,817	96%
Language other than English	485	3.9%
Spanish	445	100%
Speaks English "very well"	248	55.7%
Speaks English "well"	121	27.2%
Speaks English "not well"	58	13%
Speaks English "not at all"	18	4%
Other Indo-European	13	100%
Speaks English "very well"	7	53%
Speaks English "well"	4	30%
Speaks English "not well"	2	15.4%
Speaks English "not at all"	0	0%
Asian & Pacific Island	23	100%
Speaks English "very well"	15	65%
Speaks English "well"	8	34.8%
Speaks English "not well"	0	0%
Speaks English "not at all"	0	0%
All Other Languages	4	100%
Speaks English "very well"	0	0%
Speaks English "well"	0	0%
Speaks English "not well"	4	100%
Speaks English "not at all"	0	0%
Ability to Speak English		
5 Years and older	12,302	100%
Other than English	485	3.9%
5 to 17 years	149	1.2%
18 to 64 years	308	2.5%
65 and over	28	0.2%
English less than "very well"	215	1.7%
5 to 17 years	60	0.5%
18 to 64 years	144	1.2%
65 years & over	11	0.1%
Speak English in Household		
Linguistically isolated household (1)	43	(X)
5 Years and Older	12,138	100%
Linguistically isolated household (1)	123	1%
5 to 17 years	36	0.3%
18 to 64 years	83	0.7%
65 and over	4	0%

Rural Transit District
Title VI Compliance Plan



Table 1-H

Population 5 Years & Older By Language Spoken at Home and Ability to Speak English	Red River County (Number)	Red River County (Percent)
5 years and older	13,492	100%
Speak only English	12,708	94.2%
Language other than English	784	5.8%
Spanish	701	100%
Speaks English "very well"	383	54.6%
Speaks English "well"	139	19.8%
Speaks English "not well"	101	14.4%
Speaks English "not at all"	78	11.1%
Other Indo-European	62	100%
Speaks English "very well"	55	88%
Speaks English "well"	4	6.5%
Speaks English "not well"	3	4.8%
Speaks English "not at all"	0	0%
Asian & Pacific Island	2	100%
Speaks English "very well"	0	0%
Speaks English "well"	0	0%
Speaks English "not well"	2	100%
Speaks English "not at all"	0	0%
All Other Languages	19	100%
Speaks English "very well"	4	21%
Speaks English "well"	2	10.5%
Speaks English "not well"	13	68.4%
Speaks English "not at all"	0	0%
Ability to Speak English		
5 Years and older	13,492	100%
Other than English	784	5.8%
5 to 17 years	228	1.7%
18 to 64 years	516	3.8%
65 and over	40	0.3%
English less than "very well"	342	2.5%
5 to 17 years	103	0.8%
18 to 64 years	230	1.7%
65 years & over	9	0.1%
Speak English in Household		
Linguistically isolated household (1)	64	(X)
5 Years and Older	13,218	100%
Linguistically isolated household (1)	192	1.5%
5 to 17 years	66	0.5%
18 to 64 years	119	0.9%
65 and over	7	0.1%

Rural Transit District
Title VI Compliance Plan



Table 1-I

Population 5 Years & Older By Language Spoken at Home and Ability to Speak English	Titus County (Number)	Titus County (Percent)
5 years and older	25,659	100%
Speak only English	18,746	73%
Language other than English	6,913	26.9%
Spanish	6,796	100%
Speaks English "very well"	2,354	34.6%
Speaks English "well"	1,632	24%
Speaks English "not well"	1,927	28.4%
Speaks English "not at all"	883	13%
Other Indo-European	67	100%
Speaks English "very well"	48	71.6%
Speaks English "well"	8	11.9%
Speaks English "not well"	11	16.4%
Speaks English "not at all"	0	0%
Asian & Pacific Island	50	100%
Speaks English "very well"	23	46%
Speaks English "well"	12	24%
Speaks English "not well"	15	30%
Speaks English "not at all"	0	0%
All Other Languages	0	0%
Speaks English "very well"	0	0%
Speaks English "well"	0	0%
Speaks English "not well"	0	0%
Speaks English "not at all"	0	0%
Ability to Speak English		
5 Years and older	25,659	100%
Other than English	6,913	26.9%
5 to 17 years	2,151	8.4%
18 to 64 years	4,568	17.8%
65 and over	194	0.8%
English less than "very well"	4,488	17.5%
5 to 17 years	1,213	4.7%
18 to 64 years	3,215	12.5%
65 years & over	60	0.2%
Speak English in Household		
Linguistically isolated household (1)	827	(X)
5 Years and Older	25,047	100%
Linguistically isolated household (1)	3,092	12.2%
5 to 17 years	994	4%
18 to 64 years	2,037	8.1%
65 and over	31	0.1%



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

TRAX has three primary types of transportation services that we provide to the general public—demand response, paratransit, and fixed route. All of these services are accessible by LEP persons and the areas we predict they originate. Although these services are accessible by LEP populations we would like to grow the number of LEP riders by making materials, training and outreach that would help serve this population better. As part of our LEP plan we would like to adopt such policies and programs to meet the needs of LEP populations.

To determine Ark-Tex Rural Transit District's current interactions with LEP populations, in July 2011 TUTD administered an internal survey of Ark-Tex Rural Transit District employees' experiences with LEP populations. The findings of the survey painted a picture of relatively low levels of TUTD employee interactions with LEP populations. Only 8% of employees said they came into contact with LEP populations in a month, and 5% indicated they came into contact with people from this demographic three or more times per month. The languages they listed as most prevalently spoken amongst this population was English.

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

Demand Response and Paratransit services provide transportation for critical needs that transcend all rider types. These rides provide critical access to medical appointments, nutrition, health and human service organizations, employment, pharmacies, childcare and education. Additionally, Demand Response services provide transportation to places that improve the quality of life including friends, relatives, entertainment, and the arts. The Deviated Fixed Route in Mt. Pleasant (Titus County) provides critical transportation services for all rider types including LEP persons.

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

The Ark-Tex Rural Transit District has adequately met the transportation needs of persons with limited English proficiency. TRAX has reviewed its available resources that can be used for providing LEP assistance. TRAX has bi-lingual coordinators and dispatch staff to translate documents in a Spanish translation when needed. ATCOG has weighed the cost and benefits of translating documents for potential LEP groups. Due to the high number of LEP individuals that speak Spanish, ATCOG has determined that various documents including, but not limited to, program applications, brochures, schedules and complaint procedures will be translated into Spanish by ATCOG bi-lingual staff. For oral communication, bi-lingual staff will be utilized to provide interpretation at no additional cost to the transportation program.



LEP Program Action Plan

Within the next three years the Ark-Tex Rural Transit District will work at completing the following activities to further enhance its LEP Program as it relates to the provisions of transportation services and transit-related benefits:

1. Identify language concentrations by census tract and fixed routes.
2. Post notices of the LEP plan and the availability of interpretation or translation services free of charge in languages LEP persons would understand.
3. Establish relations with more agencies and organizations serving LEP persons.
4. Get feedback from agencies regarding key languages being used in the service area and language services needed.
5. Identify the resources agencies may have to assist TRAX with LEP persons as it related to provisions of transportation services or transit-related benefits.
6. Develop contracts or service relationships for language services.
7. Identify key documents requiring translation and translate materials into alternate languages. Although translation may not be able to be provided for all interactions with LEP persons it will help identify the need for additional resources in the future.
8. Identify sources and methods for responding to LEP correspondence.
9. TRAX will place a "Notice of Right to Language Assistance" on the ATCOG website, Transportation page (www.atcog.org/transportation).
10. Develop training for drivers including how to respond to LEP individuals and awareness of services available in dealing with LEP individuals.
11. Develop training for administrative and dispatch/scheduling staff including awareness of services available, how to respond to LEP individuals in person and over the phone, and to other types of LEP correspondence.
12. Survey TRAX staff annually on their experience concerning any contacts with LEP persons.

Rural Transit District
Title VI Compliance Plan



BODY	CAUCASIAN	LATINO	AFRICAN AMERICAN	ASIAN AMERICAN	NATIVE AMERICAN
Health & Human Services Coordination Steering Committee	76%	0%	24%	0%	0%